1. General

This procedure explains the procedure to be followed by ETKO and the activities to be carried out by the certified party in order to carry out the GLOBALGAP evaluation and certification of the production areas and processes of the certified party and GLOBALG.A.P. It does not contain requirements more stringent than its regulations. The producer/producer organization/entrepreneur who successfully obtains certification in accordance with this procedure is approved for its production areas and processes and is allowed to use the relevant ETKO logo in its commercial activities.

To obtain and maintain certification, the applicant must comply with the requirements set out in this procedure and other ETKO documents, as well as relevant legal and legal documents, and must maintain all records regarding production & processes in a satisfactory condition.

The scope of the ETKO certification process is limited only to directly controlled products and processes. The certification process does not cover systems where the products are not produced by the entrepreneur's/manufacturer's/producer organization's own system and the processes are not managed and supervised by the customer's own system.

Entrepreneurs/producers/producer organizations:

- Will comply with all applicable standards and requirements.
- The manufacturer to be certified by GLOBALBAP carries out an annual self-assessment or internal audit;
- Allow on-site inspections with full access to the production or processing operation, including non-certified production and processing areas, structures and offices;
- Will pay wages on time
- It will immediately notify ETKO in the following cases:
    - In any area, production unit, field, facility or product that is part of an operation, residue is detected at a level that exceeds MRL limits, and
    - Changes made in production sites or any section subject to certification that may affect compliance with regulations.

The document showing the fee structures is published on the ETKO website, and upon request for certification, all applicants will receive an application package containing a copy of the regulation for the relevant scope, the necessary documents considered to be relevant to the certification and other information.

2. Application for certification and contract

The offer/estimated cost to be submitted to the applicant is prepared using the Application Form (GP 23 F 01/ GP 23 F 02) and based on the information provided by the applicant. The applicant will fill out the application form according to the procedure and submit the copy to ETKO. The applicant company is given a unique license number.

In line with the information collected through the Application Form, a proposal/estimated cost will be prepared containing all the necessary details regarding the services to be provided by ETKO.

If the offer/estimated cost is accepted by the applicant, the applicant's authorized personnel will sign the necessary pages of the offer/estimated cost and submit the offer/estimated cost back to ETKO's office. The applicant will also submit an official document proving that the authority of the personnel who signed the quote/estimated cost is valid. This quote/estimated cost signed by the applicant's authorized personnel will be valid as a contract between ETKO and the applicant and will be considered an instruction to begin the certification process. GLOBALG.A.P. Payment of the control/audit and certification fee does not guarantee the issuance of the certificate.

After reviewing the documents, ETKO will determine the schedule for activities to be followed.
The first control date will be mutually determined by ETKO and the applicant. Periods and dates for surveillance visits

will be determined by ETKO to ensure system suitability and maintenance of certification. Visit dates will be notified to the applicant by ETKO at least two weeks before the control.

3. Integrated Farm Assurance Certification Process

3.1 Manufacturer's GLOBALGAP Database Record (Registration Process)

GLOBALG.A.P. Convention (GP 21 F 02) and GLOBALG.A.P. With the Sub-License and Certification Agreement (GP 23 F 04), certification rules, responsibilities of the producer/producer group and ETKO, certification processes, products of the producer, addresses and fee structure are clarified and signed between ETKO and the producer/producer group. (GP 21 F 02 and GP 23 F 04)

The applicant is always responsible for compliance with certification requirements, transmission of data updates to ETKO and compliance with GLOBALG.A.P. and GLOBALG.A.P. undertakes to comply with the payment of applicable fees determined by ETKO. After signing the Sublicense and Certification Agreement (GP 23 F 04), the existing or GLOBALG.A.P. a unique GLOBALG.A.P. identified in the database. All production sites that will be certified with the number (GGN) are GLOBALG.A.P. It is recorded in the database. GG_GR_Rules_for_CBs 6.1.a

ETKO is the party responsible for registering the applicant in GLOBALGAP Data systems, updating the data and collecting the fees.

The certified company shall confirm its registration and the relevant proposed scopes with ETKO each year before the expiry date of the certificate. Otherwise, the status will be changed from "certified" to "not approved".

During registration, the manufacturer defines the scope of the certification and completes the preparations for the audit in accordance with the scope. GG_GR_Rules_for_CBs 7.1

For GLOBALG.A.P certification, only producer groups or individual producers can apply to register their production processes. GG_GR_Rules_for_CBs 6.1.c

Product scope is linked to the location where that product is produced. Produce grown in an unregistered location will not be certified, and likewise uncertified produce grown in a registered location will not be certified. GG_GR_Rules_for_CBs 6.1.b

The registered producer is granted certificates and sublicenses for the production sites where the products are produced (and where they are packaged or processed) and for the declared products. GG_GR_Rules_for_CBs 6.1.d

Only the legal certificate holder (i.e. the legal entity specified in the certificate) can market products with reference to the GLOBALG.A.P certificate. Producer group members do not have legal certification. For this reason, the producer cannot market products on their own behalf based on the group certificate. All products sold, regardless of certification, will be recorded in the producer group mass balance system. GG_GR_Rules_for_CBs 6.1.e

ETKO and the producer agree to the terms of "notification", which includes ETKO's commitment to confirm receipt of the official application for (initial) registration within 28 calendar days. ETKO approval, GLOBALG.A.P. It contains a unique GLOBALG.A.P identification number (e.g. GGN, CoC Number) created by ETKO in its database systems. GG_GR_Rules_for_CBs 6.2.a

ETKO will create and disclose its detailed fee structure to potential customers and indicate the relevant GLOBALG.A.P system participation fee that ETKO pays to the GLOBALG.A.P Secretariat for each customer. GG_GR_Rules_for_CBs 6.2.b

ETKO asks whether a manufacturer has previously had a GLOBALG.A.P identification number and verifies the manufacturer's compliance with the transfer procedure between certification bodies. GG_GR_Rules_for_CBs 6.2.e

If a manufacturer wants to be transferred to ETKO from another certification body, ETKO must first check the status of this producer with GLOBALG.A.P. Verifies from the database system. GG_GR_Rules_for_CBs 6.2.f

If a manufacturer also receives services from a certification body other than ETKO, ETKO carries out its audits independently of the other certification body: GG_GR_Rules_for_CBs 6.2.g

* In case ETKO imposes a sanction on this manufacturer, it communicates with all certification bodies working with that manufacturer regarding the sanction and, when necessary, details of the actions to be taken in all certification bodies.
* Although it is the obligation of the manufacturer to forward a sanction to all certification bodies working with that

manufacturer, it can also be carried out by the GLOBALG.A.P Secretariat.
Producers will provide ETKO with data such as production location or product area information and inclusion/exclusion of members from a producer group during the application and for each change. GG_GR_Rules_for_CBs 6.2.h
ETKO records all information requested in the "GLOBALG.A.P data recording requirements" during database registration. GG_GR_Rules_for_CBs 6.2.1.a
ETKO ensures that all producer group members approved by the producer group QMS and included in the producer group internal registry are GLOBALG.A.P. It ensures that information is recorded individually in the database system in accordance with "GLOBALG.A.P data recording requirements" and that this information is always kept up to date. GG_GR_Rules_for_CBs 6.2.1.b
ETKO, GLOBALG.A.P. Database system, GLOBALG.A.P. It keeps the database system updated as described on its page (wiki.globalgap.org). GG_GR_Rules_for_CBs 6.2.1.c

• Confidentiality, data use, and data release:
(i) During registration, the applicant gives written permission to FoodPLUS GmbH and the CB to use their registration data for internal processes and sanctioning procedures.
(ii) All data in the GLOBALG.A.P. IT systems is available to the GLOBALG.A.P. Secretariat and the CB the applicant is working with. That data can be used for internal processes and sanctioning procedures.
(iii) The minimum and obligatory data release level, along with additional information on confidentiality and data use, is defined in the GLOBALG.A.P. data access rules.
(iv) If the applicant does not agree to the minimum data release level, the applicant is not complying with the GLOBALG.A.P. sublicense and certification agreement and can neither be certified nor belong to a producer group seeking certification.
(v) No data other than indicated in the GLOBALG.A.P. data access rules can be released by the GLOBALG.A.P. Secretariat or CBs to any other party without written consent of the applicant.

- The service contract between the CB and the applicant may be valid for up to four years, with subsequent renewal for periods of up to four years.
- Registration- An applicant may or may not:

Register the same product with more than one CB, Register the same product under more than one option (as individual producer and member of a producer group), Register production sites in different countries* (exceptions granted by the GLOBALG.A.P. Secretariat only on a case-by- case basis), operations cannot be performed.

* Cross-border (international) certification (i.e., where one certificate covers production in more than one country) is generally not allowed. Exceptions may apply. Where the certified legal entity is located in country #1 but has sites in country #2 (owned or rented), and country #2 allows this without creating a legal entity in/for country #2, these sites can be certified under the legal entity in country #1.

Register the same or different products under different standards, Choose to register only a subgroup of the producer group members producing the same product for certification**PO, Choose to register only parts of the production for certification**PO, operations can be performed.

Where legislation indicates a minimum/maximum distance of the sites from the country border, this distance shall be complied with. For the sites in country #2, the legislation of country #2 applies (e.g., regarding PPP registration, PPP application).
Sites in different countries shall always be registered as at least one different site per country, even if it is in reality only one production site. In this case (and cross-border certification generally) is considered a producer with multisites.
This rule also applies to producer groups where members have rented land in neighboring countries without having a legal entity in that country.

This rule does not apply for producer groups where some members are located in neighboring countries with separate legal entities.

**Any applicant who produces or owns products originating from GLOBALG.A.P. certified and non-GLOBALG.A.P. certified production processes (of the same product) at the same time shall register for parallel ownership (PO). Registration requirements are as follows; (GG_GR_Rules_for_QMS_v6_0-5.2.1.f-h)
Any applicant owning certified and noncertified products (of the same product) at any time shall register for PO. In addition to the requirements in "GLOBALG.A.P. registration data requirements," PO shall be declared for each product to which it applies.

If an applicant wants to register for PO at the beginning of the season because they are not sure whether they will buy or produce noncertified products as well (and they didn't have PO in the previous season), ETKO assess whether the traceability and segregation procedures are in place and ready for implementation. Once the purchase or harvest of noncertified products begins, the individual producer/producer group shall immediately inform ETKO, and ETKO require evidence of implementation of traceability and segregation procedures (by documentation or by on-site ETKO audit). (230620_GG_GR_Rules_for_PO_v6_0_Sep22_2)

3.2 Documents required by ETKO for Application Package Review
Following the conclusion of the contract, the applicant will prepare an "Application Package" for the production systems and processes and submit it to ETKO within two weeks.

Unless these documents and the copy of the contract are submitted to the ETKO office, it is not possible to make control planning.

The application package review includes the information provided in the Application Form and other documents submitted by the applicant. The purpose of this review is to determine the current status of the applicant's system and its level of compliance with the requirements and to estimate whether field checks will result in a certification at this stage.

At this stage, ETKO may request additional information for missing points or to clarify the data already submitted by the applicant. Following the examination, a report is prepared by ETKO and sent to the applicant. Prior to the site inspection, the applicant is expected to take corrective measures.

3.3 Content of the Application Package
• Latest internal audit reports and documents
• Name of the person filling out the application; the applicant's business name, address, and telephone number, and, if the applicant is an organization, the name, address, and telephone number of the person authorized to act on the applicant's behalf
• Names of all certification bodies to which applications have been made before; years of application, the outcome of the applications, a copy of any notice of non-compliance or denial of certification issued to the applicant (EX: Cancellation), to be included when available, and a description of the actions taken by the applicant to correct the non-conformances and evidence of such correction
• Other information necessary to determine compliance with regulations (e.g. geographical coordinates).
• The Applicant must have documented policies and procedures to exclude agricultural products from sale if, according to the analysis results, residues higher than MRL limits or unlicensed product residues are detected in the product.
It must prepare the quality management system and production planning based on the criteria listed below and submit it to ETKO. According to these criteria, the manufacturer must conduct an internal audit on an annual basis and the results must be forwarded to ETKO.

All Farms Base

- Record keeping and internal control,
- Land management,
- Worker health, safety and welfare
- Waste and pollution management recycling and reuse
- Environmental Protection
- Complaints and Traceability

Product Base:

- Traceability
- Production Materials
- Site history and land management
- Soil management
- Fertilizer use
- Irrigation, aqueous fertilization
- Integrated combat
- Plant protection agents

Herbal Production Bases

- Production materials,
- Soil and substrate management
- Irrigation, Aqueous fertilization
- Harvest
- Processing of the product

Group Certification

- Group definition
- Management and structure
- Management and organization
- Personnel qualification and training
- Quality Handbook
- Document Control
- Records
- Evaluation of complaints
- Internal controls
- Product traceability and discrimination
- Sanctions and non-compliances
- Recall of certified product
- Subcontractors
- Internal controller and auditor

3.3.1 Review of the Application

The applicant's preliminary audit is carried out by reviewing the application documents and/or previous audit documents before the agreed upon audit date. During the review of the application package, ETKO evaluates the application documents and information obtained and ensures the following; 17065-7.3.1

a) the information about the producer/producer group and the product is sufficient for the conduct of the certification process;
b) any known difference in understanding between ETKO and the producer/producer group is resolved, including agreement regarding standards or other normative documents;
c) the scope of certification sought is defined;
d) the means are available to perform all audit activities;
e) In order to ensure that ETKO has the necessary competence and opportunity to carry out the certification activity, the review of the information and documents in the application package is completed and if corrective action is required, it is reported to the producer/producer group.

When the certification request of the manufacturer/producer group includes a product type, a normative document or a certification scheme that ETKO has no previous experience with, ETKO identifies and evaluates these issues and informs the applicant appropriately. 17065-7.3.2

Products can be considered to be of the same type when the knowledge of the requirements, characteristics and technology related to one product is sufficient to understand the requirements, characteristics and technology of another product. 17065-7.3.2

3.3.2 Organization of the Producer/Producer Group for Audit
Before the audit, the producer/producer group must have prepared all the infrastructure related to production and completed its production, traceability records, production processes, internal control results and, when necessary, the quality management system in compliance with the applicable regulations/standards. 17065-4.1.2.2

3.3.2.1 Producer group members of producer groups
a) There shall be written contracts in force between each producer group member and the legal entity. The contracts shall include the following elements:
- Producer group name and legal identification
- Name and legal identification of the producer group member
- Producer group member's contact address
- Details of the individual production sites, including products originating from certified and noncertified production processes (contract may refer to the producer group's internal register for this information)
- Details of area (plants) or tonnage (aquaculture) (contract may refer to the producer group's internal register for this information)
- Producer group member's commitment to comply with the requirements of the relevant GLOBALG.A.P. standard
- Producer group member's agreement to comply with the producer group's documented procedures, policies, and, where provided, technical advice
- Sanctions that may be applied if GLOBALG.A.P. requirements or any other internal requirements are not being met
- Signatures of producer group members and producer group representatives

b) The registered producer group members shall be legally responsible for their respective production sites, although they remain subject to the common QMS of the producer group.
c) Producer group members are not legal certificate holders. Thus, they shall not market any products under their name with reference to the producer group certificate. All products that are sold without reference to the certificate shall be recorded in the producer group mass balance system.

3.3.2.2 Production sites of multisite producers with QMS

a) All production sites shall be owned or rented and under the direct control of the legal entity.

b) For production sites that are not owned by the legal entity, there shall be a signed document which includes a clear indication that the site owner does not have any responsibility and input or decision-making capacity for the production operations at the rented-out site. There shall also be written contracts in force between each production site owner and the legal entity that include the following elements:

- Certificate holder name and legal identification
- Name and legal identification of the production site owner
- Production site owner's contact address
- Details of the individual production sites
- Signature of both parties' representatives

c) All the product handling units (PHUs) shall be identified and registered. (230620_GG_GR_Rules_for_QMS_v6_0_Sep22_4.1.1.1 ve 4.1.1.2)

3.3.2.3 Qualification and training of personnel

a) Authorization requirements, training and qualifications for key personnel (mentioned below but also other identified personnel) should be determined and documented. These qualification requirements also apply to external consultants.

b) Management must ensure that all personnel responsible for compliance with the relevant GLOBALGAP standard receive adequate training and fulfill the established authorization requirements.

(i) In-house QMS auditor(s) and in-house farm auditors must be independent from the members/facilities.

(ii) The competence of in-house QMS auditor(s), in-house farm auditor(s) and QMS manager(s) shall be checked by management and evaluated by ETKO within the minimum qualification requirements for Key Staff of Multi-Site Producers and Producer Groups with QMS.

(iii) Members/facilities' technical advisors must meet the requirements described in the applicable G&Cs of the relevant GLOBALGAP standard according to the advice provided (e.g. plant protection product advisors, veterinary services).

c) Records of qualifications and training should be kept for all key personnel (managers, in-house auditors, etc.) involved in compliance with GLOBALGAP requirements to demonstrate competence.

d) If there is more than one in-house QMS auditor or in-house farm auditor, they should be trained and evaluated (e.g. through documented in-house witnessed audits) to ensure consistency (calibration) in their handling and interpretation of the relevant GLOBALGAP standard.

e) Systems should be in place to demonstrate that key personnel are knowledgeable and aware of developments and legislative changes regarding compliance with the relevant GLOBALGAP standard. Evidence of annual refresher training and induction should be available, including regulatory compliance where applicable, for key personnel as identified above.

3.3.2.3.1 Minimum qualification requirements for Key Staff of Multi-Site Producers and Producer Groups with QMS

3.3.2.3.1.1 Key tasks

3.3.2.3.1.1.1 QMS manager

a) The QMS manager shall manage the organization's QMS in order to ensure compliance by all registered members/sites and PHUs. This includes, for example, development and control of QMS documentation, management of an internal register, receiving the QMS audits (both internal and by the CB), and implementing the necessary corrective actions.

b) The QMS manager may conduct internal farm audits (at members/sites) to assess compliance with the certification requirements.

c) The QMS manager shall produce timely and accurate reports on such internal farm audits.

d) However, the QMS manager shall not perform internal QMS audits.

e) If the QMS manager does not perform the internal farm audits, they can approve the members/sites based on the audit reports of the internal farm auditor(s).

3.3.2.3.1.1.2 Internal QMS auditors

a) The internal QMS auditor audits the QMS and central PHUs of the producer group/multisite producer with QMS to assess compliance with the certification requirements.

b) The QMS auditor shall produce timely and accurate reports on such audits.

c) The QMS auditor may approve the members/sites based on the audit reports of the internal farm auditor(s). If internal QMS auditors conduct the farm audits, they shall not approve those audit reports.

3.3.2.3.1.1.3 Internal farm auditors

a) The internal farm auditor conducts farm audits at members/sites and their PHUs (of producer group members) to assess compliance with the certification requirements.

b) The internal farm auditor shall produce timely and accurate reports on such audits.

c) The internal farm auditor shall not perform internal QMS auditor tasks.

3.3.2.3.1.2 Qualification requirements

3.3.2.3.1.2.1 Formal qualifications for internal QMS and farm auditors

3.3.2.3.1.2.1.1 Internal QMS auditors

A post-high school diploma in a discipline related to the scope of certification (plants and/or aquaculture); or an agricultural high school qualification with two years of experience in the relevant scope after qualification; or any other high school qualification with two years of experience in QMS and three years of experience in the relevant scope after qualification.

3.3.2.3.1.2.1.2 Internal farm auditors

A post-high school diploma in a discipline related to the scope of certification (plants and/or aquaculture); or an agricultural high school qualification with two years of experience in the relevant scope after qualification; or any other high school qualification with three years of sector- specific experience (e.g., farm management, including own operations in the relevant product; commercial consultant in the relevant product; field experience relevant to specific products) and participation in educational opportunities relevant to the scope of certification.

3.3.2.3.1.2.2 Technical skills and qualifications

3.3.2.3.1.2.2.1 QMS manager

Completion of internal QMS auditor training related to QMS and training related to the relevant GLOBALG.A.P. standard (total minimum duration of 16 hours)

3.3.2.3.1.2.2.2 Internal QMS auditors

a) Practical knowledge of QMS

b) Completion of internal QMS auditor training related to QMS (minimum duration 16 hours)

3.3.2.3.1.2.2.3 Internal farm auditors

Sign-off of internal farm auditors shall only occur as a result of:

a) One-day practical audit training setting out basic principles of auditing

b) Observing two CB or internal GLOBALG.A.P. farm audits (or other) by an already qualified auditor, and one successful witness audit by the internal QMS auditor, by a qualified internal farm auditor, or by the CB

3.3.2.3.1.2.2.4 Training in food safety and good agricultural practices for internal QMS and farm auditors

a) Training in the HACCP system either as part of formal qualifications or by the successful completion of formal training based on the principles of the Codex Alimentarius or training in food safety management standards (e.g., ISO 22000, BRCGS, IFS, PHA)

b) Food hygiene training either as part of formal qualifications or by the successful completion of formal training

c) For plants scope: plant protection, fertilizer, and integrated pest management training, either as part of formal qualifications or through the successful completion of formal training; all formal trainings by specialists on these topics

d) For aquaculture scope: basic veterinary medicine, including animal health and welfare issues

e) In all cases internal auditors shall have practical knowledge about the products they are auditing. Experience may be complemented by trainings on **product** characteristics and handling operations. These trainings can be done internally.

3.3.2.3.1.2.3 Communication skills

a) QMS manager and internal auditor(s) shall have “working language” skills in the corresponding native/working language. This shall include locally used specialist terminology in the respective working language.

b) Exceptions to this rule shall be clarified beforehand with the CB before the internal audit.

3.3.2.3.1.2.4 Independence and confidentiality

a) Internal auditors are not allowed to audit their own work. Independence of key staff shall be controlled and ensured by the QMS (i.e., an internal QMS auditor cannot evaluate their own operations or a producer they have also consulted in the last two years, the QMS manager cannot perform QMS audits, etc.).

b) Key staff shall strictly observe the producer group’s/multisite producer’s procedures for maintaining the confidentiality of information and records.

Note: The qualification of internal auditors shall be evaluated annually by the CBs (GG_GR_Rules_for_QMS_v6_0-PartB)

3.3.2.4 Document control

a) All documentation relevant to the operation of the QMS for GLOBALG.A.P. compliance shall be adequately controlled. This documentation shall include, but is not limited to:

(i) The quality manual

(ii) GLOBALG.A.P. operating procedures

(iii) Work instructions and policies

(iv) Recording forms

(v) Relevant external standards (e.g., the current GLOBALG.A.P. normative documents)

b) Documentation shall be sufficiently detailed to demonstrate compliance with the requirements of the relevant GLOBALG.A.P. standard.

c) Relevant documentation shall be available to assigned staff and registered producer group members.

d) The contents of the quality manual shall be reviewed periodically to ensure that it continues to meet the requirements of the relevant GLOBALG.A.P. standard and those internal requirements defined by the QMS. Any relevant modifications of the applicable GLOBALG.A.P. standard or published normative and obligatory documents that come into force shall be incorporated into the quality manual within the period given by the GLOBALG.A.P. Secretariat.

3.3.2.4.1 Document control requirements

a) There shall be a written procedure defining the control of documents.

b) All documentation shall be reviewed and approved by authorized staff before issue and distribution.

c) All controlled documents shall be identified with an issue number, issue/review date, and appropriate page numbers.

d) Any changes in these documents shall be reviewed and approved by authorized staff prior to their distribution. Wherever possible, an explanation of the reason and nature of the changes shall be given.

e) A copy of all relevant documentation shall be available at any location where the QMS is being controlled.

f) There shall be a system in place to ensure that documentation is reviewed and obsolete documents are effectively rescinded after new documents have been issued.

3.3.2.4.2 Records

a) There shall be records to demonstrate effective control and implementation of the QMS (including requirements, policies, and procedures of the quality manual and other relevant QMS documentation) and compliance with the requirements of the relevant GLOBALG.A.P. standard.

b) Records shall be kept for a minimum of two years.

c) Records shall be genuine, legible, stored appropriately, and maintained in suitable condition and shall be accessible for audits as required.

d) Records that are kept online or electronically are valid. If a signature is required, this can be a password or electronic signature that ensures the unique reference and authorization of the person signing. If a signature of the responsible person is needed, then this shall be present. The electronic records shall be available during the audits. Backups shall be available at all times.

3.3.2.5 Complaint handling

a) The applicant shall have a system for effectively managing customer complaints and the relevant part of the complaint system shall be available to the producer group members.

b) There shall be a documented procedure that describes how complaints are received, registered, identified, investigated, followed up, and reviewed.

c) The procedure shall be available to customers as required.

d) The procedure shall cover both complaints against the certificate holder and complaints against individual members/sites.

e) If the certificate holder or a producer group member is facing a complaint regarding food safety (i.e., potentially involved in a foodborne outbreak), workers' well-being, environmental protection, or animal welfare, or is involved in a court trial or has been found by a court of law to have infringed a national or international law, and these actions can endanger the reputation and credibility of FoodPLUS GmbH and/or the GLOBALG.A.P. standard, the certificate holder shall inform ETKO within 24 hours.

(230620_GG_GR_Rules_for_QMS_v6_0_Sep22_4.3-4.4)

3.4 Field Control

Before the field control, the control plan prepared by the controller and approved by the control department manager will be sent to the applicant.

If the applicant objects to any of the appointed controllers, ETKO will formally notify its management with valid and objective evidence. If ETKO management finds the objection appropriate, the assigned controller will be replaced.

During the field check the applicant will:

• It will provide controllers with sufficient information proving that production processes comply with the relevant requirements.

• Provide access to facilities, records, personnel to enable controllers to verify that production systems and processes are maintained.

• Will collaboratively resolve nonconformance and initiate corrective action.

The operator/producer/producer organization will keep the updated documentation regarding the certification and send it to the controller during the inspection.

Initial site control will be carried out in accordance with ETKO procedures and will cover the following:
• An opening meeting with authorized personnel or management of the entrepreneur/producer/producer organization. Scope will be confirmed, reporting method and how to deal with nonconformities will be discussed. Responsible personnel of the entrepreneur/producer/producer organization will be present at the opening meeting. A site visit should be made after the meeting.
• All nonconformities and observations will be discussed with the entrepreneur/producer/producer organization.
• All findings will be reported to the entrepreneur/producer/producer organization at the closing meeting.
• A control report will be prepared and submitted to the entrepreneur/producer/producer organization.
• There may be producer organization projects in which producers with small production areas are members or partners. In this case, an internal control system is needed that conducts internal audits of manufacturers to prepare them for certification. The internal audit mechanism will also be audited within the framework of the relevant regulation.

3.4.1 Additional GLOBALGAP Requirements

ETKO audit is carried out annually. CB control covers: GG_GR_Rules_for_CBs 7.1
• All registered products and production processes
• All registered production facilities
• All registered product processing units
• Administrative areas where relevant
ETKO audit content for both Option 2 and Option 1 scope is organized on a three-year cycle: GG_GR_Rules_for_CBs 7.1
• First CB audit (for version 6): all requirements included in valid checklists (for QMS and farm audits)
• Subsequent UK audit (2nd year): operational elements identified in applicable checklists (for QMS and farm audits)
• Subsequent UK audit (3rd year): operational elements identified in applicable checklists (for QMS and farm audits)
• Re-certification audit: All requirements in the applicable checklists (for QMS and farm audits) in the same way as the first UK audit
Additionally, ETKO may conduct additional announced or unannounced inspections or on-site visits to investigate complaints. GG_GR_Rules_for_CBs 7.1
The usual ETKO farm (for Option 1 individual producer without QMS) audit time for the GLOBALG.A.P IFA standard is between three and eight hours on site. GR – Rules for plants scope 3.3.b
The minimum period of three hours applies to the simplest situations (a production facility, one or several products, simple machinery, a small number of workers, no product processing, subsequent ETKO farm inspection, well-organized documentation, etc.). This minimum period does not include preparation, travel and GRASP assessment. GR – Rules for plants scope 3.3.c
ETKO farm inspection duration is a minimum of two hours per producer group member/production facility of the Option 2 producer group with QMS or the Multi-Field Option 1 Producer with QMS in simple cases. However, depending on the complexity of the farming situation, it may be determined to be shorter under certain circumstances. GR – Rules for plants scope 3.3.d
Factors that will increase ETKO farm inspection time (for production facilities of both Option 2 producer group members and Option 1 individual producers) beyond a minimum of three hours include the following: GR – Rules for plants scope 3.3.e
* First farm inspection
* Addition of new products during subsequent farm inspections
* Addition of new locations during subsequent farm inspections
* Having storage
* Product transportation
* Having different product types
* Having different harvest types (harvest methods)

* Having multiple areas and locations
* Use of subcontractors

3.4.1.1 Single Field Producer and Multiple Field Producer Controls without QMS (Option 1): GG_GR_Rules_for_Individual Producers 6 & GG_GR_Rules_for_CBs 7.2

Before the audit, the manufacturer completes its self-assessment and submits its evidence to ETKO, and ETKO audits are carried out as follows:

	First and Later Years in Certification
Producer Self-Assessment	1. Self-assessment of the entire scope (all registered products, sites and Product Processing Units) is carried out annually
CB Audit	1. First CB Audit: the entire scope (all registered products, sites and Product Processing Units) is inspected with notice. 2. Subsequent CB Audit: full scope (all registered products, sites and Product Processing Units); It is inspected annually with notice. However, depending on the risk situation, 10% can be inspected without notice.

3.4.1.1.1 Producer Self-Assessment

Self assessment;

• It will cover all registered production sites, products and processes within the scope of certification in order to verify compliance with the requirements defined in the applicable Principles and Criteria.

• It will be carried out by the manufacturer or under the responsibility of the manufacturer.

• It will be carried out annually and before ETKO audit.

Completed Self-Assessment checklist;

• It will be kept on site at all times, ready for inspection.

• Will include comments on observed evidence for all non-applicable and non-compliant Major Must and Minor Must Principles and Criteria. There is no need to comment on the recommendations, regardless of whether they are feasible or not.

3.4.1.1.2 ETKO Audit

These inspections (announced and unannounced) are performed by an ETKO auditor approved for the specific scope.

ETKO auditor performs the audit using the full checklist of the applicable scope(s).

ETKO audit covers all registered products and all production processes, all registered production sites, all registered product processing units and, where relevant, administrative facilities.

It is also checked that the checklist used by the manufacturer for self-assessment/internal audit is correct according to the scope of certification defined during the manufacturer's registration in the GLOBALGAP database. GG_GR_Rules_for_CBs 7.1

3.4.1.1.2.1 Informed ETKO Inspection

The first CB audit of each producer and the subsequent CB audits carried out annually in the following years are carried out with notice.

3.4.1.1.2.2 Unannounced ETKO Inspection

A producer has a 10% chance of receiving an unannounced follow-up audit within the ETKO audit scope.

During registration, the producer may specify a maximum of 15 days for which he/she is not available for an unannounced ETKO inspection.

For unannounced inspection, ETKO informs the producer at most 48 hours (two business days) in advance. In the exceptional case where it is not possible for the producer to accept the proposed date (for medical or other justified

reasons), the producer is given another chance to be informed about an unannounced ETKO inspection. Objective evidence of justification is maintained (e.g. medical documentation). If there is no justified reason, the manufacturer accepts the unannounced ETKO inspection or will be suspended. If the first proposed date is not accepted, a written warning will be given to the manufacturer, regardless of whether the rejection is justified or not. The producer receives another 48-hour notice for a new unannounced ETKO inspection. If this inspection cannot be carried out, all products will be suspended (i.e. the certificate will be suspended). The suspension is lifted following the unannounced ETKO inspection.

3.4.1.1.2.3 Off-site and on-site stages of ETKO Audit

ETKO may divide announced ETKO audits (both initial and subsequent audits) into two phases to be performed by the same ETKO auditor:

• Off-site phase: This phase includes the documents sent by the manufacturer to the ETKO auditor before the ETKO audit, such as self-assessment, risk assessments, necessary procedures regarding the Principles and Criteria, analysis program (frequency, parameters, locations), analysis reports, licenses, list of drugs used. (if applicable), list of plant protection products used (if applicable), evidence of laboratory accreditation, certificates or evaluation reports, subcontracting activities, plant protection product/fertilizer/medicine application records (if applicable), including animal health plan, etc. It consists of examining documents at a desk.

• The off-site phase is carried out a maximum of four weeks (28 days) before the on-site phase. Documentation; It can be supported by interviews and remote inspection of the site and facilities.

ETKO offers the Off-Site Audit Phase as an option to its customers. And the Off-Site Inspection Stage method is used only if mutual agreement is reached with the relevant manufacturer on the use of this stage. In this case, the ETKO Auditor determines a deadline for the producer to submit the documents that will be evaluated during the off-site audit phase and informs the producer. Using the Off-Site Audit Phase method does not cause a reduction in the overall duration of the ETKO audit, but allows more efficient use of on-site time. The duration of the on-field phase is never less than two hours.

The off-site phase is recorded in the audit checklist with adequate comments for specific principles and criteria. Comments are provided for all possible Major Musts and all non-compliant and non-applicable Minor Must policies and criteria.

The date, time and duration of each off-site inspection phase are recorded by the ETKO inspector and signed by the manufacturer or specifically confirmed by email.

The manufacturer has the right not to send certain requested documents to ETKO if they are considered confidential. In this case, the information will be available at the field stage.

The on-site phase is carried out after the off-site phase and consists of on-site inspection of the remaining content of the checklist, the production process, registered facilities/Product Processing Units and verification of previously reviewed information. The on-site phase includes, at a minimum, an audit of good agricultural practices and food safety requirements to determine compliance.

3.4.1.1.3 Initial and Subsequent CB Inspections

3.4.1.1.3.1 First CB Audit

This section;

- For manufacturers who want to obtain GLOBALG.A.P certification for the first time,
- For manufacturers who want to add a new product to the existing GLOBALG.A.P certification, and
- Applies to producers who change their status from producer group member to individual producer.

When a manufacturer switches from another certification body to ETKO, this is not considered an initial CB audit, but a subsequent audit.

Initial CB audits fulfill the following requirements:

- ETKO audit is carried out after ETKO accepts the manufacturer's registration.
- Before the certificate is issued, the harvest activities of each product to be included in the certification within the scope of the certification and also the product handling activities, if included, are inspected. Field work other than this can be inspected at a different time if possible, but this is not mandatory. GG_GR_Rules_for_plants 3.1.1
- A product is included in the certification after all applicable Principles and Criteria have been inspected during the production process (i.e. it is not possible to certify a future production process). GG_GR_Rules_for_plants 3.1.1
- If the inspection is carried out before harvest, it will not be possible to inspect some Principles and Criteria. In this case, a follow-up audit is carried out and the certificate is not issued until all Principles and Criteria applicable to the manufacturer have been audited and all non-conformities have been closed. GG_GR_Rules_for_plants 3.1.1
- If the audit takes place after harvest, the producer must retain evidence of compliance with the Principles and Criteria for that harvest, otherwise it will not be possible to audit these Principles and Criteria and certification of those products cannot be made until the next harvest. GG_GR_Rules_for_plants 3.1.1
- In cases where harvest is excluded, the inspection is carried out at a time when the relevant agricultural activities are carried out. GG_GR_Rules_for_plants 3.1.1
- If the manufacturer requests certification for more than one product and not all of the products have the same seasonal timing, although all the requirements specified in this section are valid for the relevant products, the ETKO auditor must review all the Principles applicable to each product in these groupings before the product(s) can be added to the certificate. and Criteria, and harvesting and product processing processes are inspected on-site for at least one product in each product group. GG_GR_Rules_for_plants 3.1.1
- The producer will have records that will be verified during the audit process from the date of registration or at least three months before the first CB audit takes place, whichever is longer.
- Products harvested/processed before registration are not included in the certificate.
- Records regarding harvest or product processing prior to registration are not valid.

3.4.1.1.3.2 Subsequent CB Inspections

The entire certification scope is audited annually by ETKO before the certificate is issued.

If product handling is included in the scope of certification, product handling at the site(s)/facility(s) is inspected annually. This inspection is performed while the product processing process is running. A product processing audit is carried out every two years only if a risk assessment by ETKO is available which clearly shows that the risk is low. The risk assessment will take into account GLOBALG.A.P's relevant instructions for examining the product(s) processed and specific criteria, as well as any known food safety incidents related to the relevant product(s). ETKO records the justification for the selected ETKO audit schedule. This exception only applies to Option 1 individual producers without a QMS. GG_GR_Rules_for_plants 3.1.2

If product handling is excluded from the scope of certification, the inspection is carried out every two years during the harvest season. At least one registered product per product group in the relevant year is inspected on-site during the harvest season. Product groupings are made based on similarities in production and harvesting processes and their risks. ETKO keeps in writing the justification for the selected audit timing and product groupings used. GG_GR_Rules_for_plants 3.1.2

Product groupings are based on the following process descriptions:GG_GR_Rules_for_plants 3.1.2

- Mechanical harvest (In cases where this is the only harvesting method, there is no obligation to make observations during harvest. Only the records regarding the operation of the machine and the harvester are checked before or after harvest.)
- Manual harvesting of products not classified as high risk in the GLOBALG.A.P product list
- Manual harvesting of products classified as high risk in the GLOBALG.A.P product list
- Packaging on site

If the producer does not undertake to continue the certification for the next cycle, ETKO ensures that a certificate does not cover more than one harvest and cultivation cycle of the same product harvested annually, for example by using the method of shortening the validity of the certificate. ETKO may determine the deadline for reconfirmation according to the harvest period of the product. GG_GR_Rules_for_plants 3.1.2

In cases where there is more than one product following each other, during the inspection, interviews with the producers and workers, examination of documents and records, etc. The production process of all products included in the scope of certification, including The manufacturer will maintain evidence of compliance with the applicable Principles and Criteria for all registered products. In years where the inspection does not need to be carried out during the harvest season and when the products do not have the same seasonal timing, ETKO selects a date when the relevant agricultural activities can be observed on site at least one of the products. If the difference between harvest seasons of registered products is longer than four months or cannot be met during the extension of the certificate validity period, additional inspection is carried out for harvest-specific requirements. GG_GR_Rules_for_plants 3.1.2

Subsequent CB Audit management is also applied to manufacturers who switch to ETKO from another certification body.

For the 10% of certified individual producers without a QMS, subsequent UK audits are carried out unannounced.

Subsequent UK audits must be carried out four months before the original expiry date of the certificate and the validity period of the certificate within GLOBALG.A.P. In case of extension in the database system, it is carried out at any time when the relevant agricultural activities and/or processing (but not only storage) are carried out within the period up to four months after the original expiry date of the certificate. GG_GR_Rules_for_plants 3.1.2

The timing of the audit is determined as a period during which it can be ensured that all registered products are used in accordance with the certification requirements, even if they are not available at the time of the audit. Whenever possible, inspections are not carried out out of season or when farming activities are at a minimum. GG_GR_Rules_for_plants 3.1.2

A gap of at least six months is allowed between two subsequent inspections.

Subsequent UK audit ensures that the manufacturer complies with GLOBALG.A.P. It is performed after updating the record in the database system. The registration renewal process is completed before the date of the subsequent CB audit.

3.4.1.2 Option 2 producer groups and Multi-site Option 1 Producer Audits with QMS: GG_GR_Rules_for_CBs 7.3

3.4.1.2.1 Internal audits

a) The applicant shall undertake an internal QMS audit and internal farm audits of all members/sites and PHUs, covering all products and processes under the certification scope, to verify and ensure compliance with the certification requirements.

b) The internal audits (QMS, PHUs, and members/sites) shall be carried out by the internal auditor(s) before the first CB audit and thereafter once per annum.

3.4.1.2.1.1 Internal QMS audits

a) The GLOBALG.A.P. QMS requirements shall be audited at least annually.

b) Internal QMS auditors shall comply with the requirements set in section **4.2.3.1 Minimum qualification requirements for Key Staff of Multi-Site Producers and Producer Groups with QMS.**

c) Where the internal QMS auditor does not have the necessary training in food safety and/or good agricultural practices (G.A.P.) but only QMS training/experience, another person with these qualifications (and identified in the QMS) shall form part of the internal audit team to perform the internal PHU audits and the approval of the internal farm audits. Persons without food safety and G.A.P. qualifications cannot perform internal farm audits.

d) Internal QMS auditors shall be independent of the area being audited.

e) The same person who initially develops the QMS may undertake the required internal QMS audits. However, the person responsible for the day-to-day ongoing management of the QMS is not allowed to conduct the internal QMS audits.

f) Records of the internal QMS audit, internal audit findings, and follow-up of corrective actions resulting from the internal QMS audit(s) shall be maintained and available.

g) The completed QMS checklist (including central PHU requirements, where applicable) shall include comments for every QMS requirement and shall be available on-site for review by the CB auditor during the CB audit.

h) The QMS checklist shall include the name and signature of the audited QMS representative, as well as the name and signature of the internal QMS auditor.

i) Where the internal QMS audit is not performed in 1 day but continuously over a 12-month period, a predefined schedule shall be in place.

j) The internal QMS audit shall be based on the GLOBALG.A.P. QMS requirements.

3.4.1.2.1.2 Internal members/sites audits

a) Internal farm audits against all relevant GLOBALG.A.P. P&Cs shall be carried out at each registered member/site (including corresponding production sites and PHUs) at least once per year. Farm/Site production-related records (e.g., medicine/plant protection product (PPP) application records) shall be present and audited on-farm to cross-check them with the farm situation (e.g., products, interviews, stores).

b) Internal farm audit timing shall follow the rules defined in the GLOBALG.A.P. GR and scope-specific rules.

c) Internal farm auditors shall comply with the requirements set in section 8, Minimum qualification requirements for key staff.

d) Internal farm auditors shall be independent of the area being audited and therefore be assigned via the QMS. Internal farm auditors cannot audit their own daily work.

e) New members/sites shall always be internally audited and approved prior to being entered in the QMS internal register (see section 4.2).

f) The original internal farm audit reports and notes shall be maintained and available for the CB audit.

g) The internal farm audit report shall contain the following information:

(i) Identification of registered member(s)/site(s)

(ii) Signature of the registered member and/or person responsible for the production site

(iii) Date

(iv) Internal farm auditor name and signature

(v) Registered products

(vi) Internal farm audit result against each of the GLOBALG.A.P. P&Cs.

(vii) Comments on P&Cs. Unless the GLOBALG.A.P. Secretariat issues a separate document predetermining which P&Cs shall be commented on, the checklist shall include details in the comments section for the Major Must P&Cs that are found to be compliant, Major Must and Minor Must P&Cs that are found to be non-compliant, and/or not applicable. This is necessary so that the audit trail can be reviewed after the event. Recommendations do not require comments.

(viii) Details of any non-compliances identified and period for implementation of corrective actions

(ix) Internal farm audit results with calculation of compliance

(x) Duration of the internal farm audit (record of start and end time)

(xi) Name of internal QMS auditor who approved the audit report. Any other evidence of review and approval is also possible.

h) The internal QMS auditor (or internal audit team; see section **5.1.2.1.1.**c) shall review and make the decision on whether the member/site is compliant with the GLOBALG.A.P. requirements based on the internal farm audit reports presented.

i) If there is only one internal QMS auditor who also performs the internal farm audits, the QMS manager shall approve the internal farm audits.

j) Where the internal audits take place continuously over a 12-month period, a predefined schedule shall be in place. This is not applicable for initial certification audits.

3.4.1.2.1.3 Non-compliances, corrective actions, and sanctions

a) There shall be a documented procedure for handling the non-compliances and corrective actions which may result from internal or ETKO audits, customer complaints, or failure of the QMS. This procedure shall describe how to identify and evaluate non-conformances and non-compliances detected at the QMS, PHU, and member/site levels.

b) Corrective actions following non-compliances shall be evaluated and a timescale defined for action.

c) Responsibility for implementing and resolving corrective actions shall be clearly defined.

d) A system of sanctions that meets the requirements defined in section 14 shall apply to all members/sites. All internal sanctions shall be decided by the QMS.

e) A product cannot be partially suspended for a member/site (i.e., the entire product shall be suspended).

f) Mechanisms shall be in place to immediately notify the GLOBALG.A.P. approved CB about suspensions or cancellations of registered members/sites.

g) Records shall be maintained of all sanctions, including evidence of subsequent corrective actions and decision-making processes.

h) Producer group members cannot change producer groups until the non-conformance that led to the respective sanction is satisfactorily closed.

i) Producer groups can lift product suspensions and self-suspensions issued by themselves on their accepted producer group members.

3.4.1.2.1.4 Product traceability and segregation

a) For requirements on parallel ownership, including product labeling, please see “GLOBALG.A.P. general regulations – Rules for parallel ownership.”

b) There shall be a documented procedure for identifying registered products and ensuring traceability of all products (conforming and non-conforming) to their members/sites.

c) A mass balance exercise shall be carried out at least annually for each registered product to demonstrate compliance within the certificate holder’s legal entity.

d) Products meeting the requirements of the relevant GLOBALG.A.P. standard and marketed as such shall be handled in a manner that prevents their being mixed with products not meeting the requirements of the GLOBALG.A.P. standard. An effective system shall be in place to ensure segregation of products originating from certified and noncertified production processes. This can be done via physical identification or product handling procedures, including the relevant records.

e) Effective systems and procedures shall be in place to prevent any mislabeling of products originating from GLOBALG.A.P. certified and noncertified production processes. Conforming products entering the PHU(s) (either from members/sites or from external sources) shall be immediately identified with a GLOBALG.A.P. identification number (e.g., GGN) or any other reference that is clearly explained in the QMS procedures and provides a unique reference to their certification status in order to ensure proper segregation during handling processes. This reference shall be used on the smallest individually identified unit.

g) There shall be a final document check to ensure correct product dispatch of products originating from certified and noncertified production processes.

h) All transaction documentation (sales invoices, other sales-related documents, dispatch documentation, etc.) related to sales of products coming from a certified production process shall include the GLOBALG.A.P. identification number of the certificate holder and shall contain a reference to the GLOBALG.A.P. certification status. This is not obligatory in internal documentation. Positive identification is enough (e.g., “GGN_GLOBALG.A.P. certified <product name>”). Indication of the certification status is obligatory regardless of whether the certified product (i.e., product coming from a certified production process) is sold as certified or not. This, however, cannot be checked during the initial CB audit because the producer group/multisite producer is not yet certified and cannot refer to the GLOBALG.A.P. certification status before the first positive certification decision.

i) Appropriately to the scale of the operation, procedures shall be established, documented, and maintained for identifying incoming products originating from certified and noncertified production processes from members/sites or purchased from different sources (i.e., other producers or traders). Records shall include:

(i) Product description

(ii) GLOBALG.A.P. certification status

(iii) Quantities of incoming/purchased product(s)

(iv) List of approved suppliers and supplier details

(v) Copy of the GLOBALG.A.P. certificates, in case of products originating from certified production processes

(vi) Traceability data/codes related to the incoming/purchased products

(vii) Purchase orders/invoices received by the certificate holder

j) Sales details of products originating from certified and noncertified production processes shall be recorded, with particular attention to quantities delivered/sold as originating from certified production processes.

k) Quantities (including information on volumes or weight) of incoming, outgoing, and stored products (including the certification status, whether originating from certified or noncertified production processes) shall be recorded and a summary maintained so as to facilitate the mass balance verification process. The documents shall demonstrate the consistent balance between certified and noncertified input and the output. The frequency of the mass balance verification shall be defined and appropriate to the scale of the operation, but the verification shall be done at least annually for each product. Documents for demonstrating mass balance shall be clearly identified. During initial CB audits, the system shall be ready, but there are still no records available, as the processes have not yet been certified.

l) The PHUs included in the certification scope shall operate procedures that enable registered products to be identifiable and traceable from receipt through handling, storage, and dispatch.

m) Conversion ratios shall be calculated and available for each relevant handling process. All generated product waste quantities shall be recorded. Losses due to handling, sorting, grading, and other shall be calculated and records of the losses shall be available for each handling process where loss occurs. The losses can be estimated but shall be justifiable and supported by records. A valid estimated record of the quantity or volume of harvested/slaughtered/processed product shall be compared with the records of the amount of product sold.

n) This section shall be audited both internally and by ETKO also at PHU level while PHUs are in operation.

3.4.1.2.1.5 Product withdrawal

a) Documented procedures shall be in place to effectively manage the withdrawal of registered products.

b) Procedures shall identify the types of events that may result in a withdrawal, persons responsible for taking decisions on the possible product withdrawal, the mechanism for notifying customers and the GLOBALG.A.P. approved CB, and methods of reconciling stock.

c) The procedure shall be capable of being operated at any time.

d) The procedure shall be tested in an appropriate manner at least annually to ensure that it is effective and records of the test retained. If a real withdrawal occurred during the last 12 months, it can be counted as the annual test.

3.4.1.2.1.6 Outsourced activities

a) Where any activities are outsourced to third parties, procedures shall exist to ensure that these activities are carried out in accordance with the requirements of the relevant GLOBALG.A.P. standard.

b) Records shall be maintained to demonstrate that the competency of any subcontractor is assessed and meets the requirements of the relevant GLOBALG.A.P. standard.

c) Subcontractors shall work in accordance with the QMS-relevant procedures and this shall be specified in service level agreements or contracts. (230620_GG_GR_Rules_for_QMS_v6_0_Sep22_4.5- 4.8)

3.4.1.2.2 Notified UK QMS audits GG_GR_Rules_for_CBs 7.3.1

The informed UK QMS audit follows the three-year cycle described in the “Annual Audit Plan” section of this procedure. ETKO QMS audit includes a sampling of components (e.g. producer group members, production facilities, Product Processing Units, documents, records) to check compliance with the relevant standard and enable certification. All documentation, sites, personnel and operations declared by the producer group/multi-site producer to be relevant to the installation and management of the QMS as described in the "GLOBALG.A.P general regulations - Rules for multi-site producers and producer groups with a QMS" are audited.
The purpose of the ETKO QMS audit is to evaluate whether the implemented QMS ensures that all components of the system comply with the certification requirements defined by the applicable scope(s).
ETKO QMS audit consists of the QMS audit (including central Product Processing Units, if any) and the audit of a sample of registered producer group members/productions/processing facilities.
ETKO sends the audit plan to the QMS representative before the UK QMS audit.
ETKO QMS audit is carried out at the head office/administrative center of the producer group/multi-field producer and central Product Processing Units.
The ETKO QMS audit takes at least six to eight hours depending on the size of the producer group/multi-site producer and includes:

- Opening meeting with management
- Review of all relevant documents
- Evaluation of records
- Assessment of qualifications of internal QMS auditors and internal farm auditors
- Review of internal QMS audits and internal farm audits
- Review of traceability and mass balance requirements
- Interviews with relevant personnel
- Closing meeting, including explanation of nonconformities identified at the QMS level

As part of the ETKO QMS audit, the results of external and internal audits are compared to evaluate whether the applicant's internal controls are appropriate.
The closing meeting of the entire ETKO QMS audit is held only after the QMS, Product Processing Units and minimum member/field sample are audited. The entire QMS audit (including the audit of central Product processing Units and the audit of member/field samples) is completed within a maximum of one month. The final ETKO audit report includes all findings and final conclusions for the entire producer group/multi-site producer and is presented during the closing meeting. The QMS representative signs the report or confirms its content specifically by email. 28 days to close the detected non-conformities start from the date the report is approved.
The closing meeting date is the audit report date and GLOBALG.A.P. It is recorded in database systems as ETKO audit date. ETKO QMS auditor is present at the closing meeting.

3.4.1.2.3 ETKO QMS audit off-site and on-site stages GG_GR_Rules_for_CBs 7.3.2

ETKO can divide the announced QMS audit into two stages: off-site phase and on-site phase. Both stages are carried out by the same ETKO QMS auditor.
The off-site phase occurs up to four weeks (28 days) before the on-site phase. The off-site phase consists of a desk-based review of the documents sent to ETKO by the QMS before the on-site phase. The ETKO Auditor sets a deadline for the QMS to submit documents to be audited off-site, which will trigger a 4-week period for the on-site phase to be carried out. This date will trigger the 4-week period to carry out the off-site phase.
Documents evaluated by ETKO at the off-site stage; for example, internal QMS audit and internal farm audit reports, internal register of approved members/premises, risk assessments, procedures, residue monitoring system documentation (frequency, parameters, sampling schedule), residue analysis reports, licenses, list of drugs used, plant

protection used It includes a list of its products, evidence of laboratory accreditation, certifications and internal reports on subcontracting activities. Documentation; It can be supported by interviews and remote inspection of the sites.
The off-site phase is recorded in the QMS checklist with adequate comments on the evidence examined.
The date, time and duration of the off-site and on-site phases of each ETKO QMS audit are recorded by the ETKO QMS auditor and signed by the manufacturer or specifically confirmed by e-mail.
The on-site phase is carried out after the off-site phase (within 4 weeks at most) and consists of an on-site audit of the remaining content of the QMS checklist, as well as the information reviewed during the off-site phase and the way the QMS operates (e.g. internal audits, traceability, separation and mass balance, centralized Product Processing Units) during the on-site phase. consists of verification. (230620_GG_GR_Rules_for_QMS_v6-6.1.1.1)
If nonconformities are detected during the ETKO audit process, the countdown to the deadline for closing them begins with the last closing meeting of the on-site phase, where the audit result is signed or specifically approved by the manufacturer by e-mail.
Using the off-site phase does not shorten the overall ETKO inspection time, but it does allow for more efficient use of on-site time. The duration of the on-field phase is never less than three hours.

3.4.1.2.4 ETKO inspection of members/sites and Product Processing Units GG_GR_Rules_for_CBs 7.3.3

3.4.1.2.4.1 Annual Initial Certification/Subsequent certification audits GG_GR_Rules_for_CBs 7.3.3.2

Members/field sampling and/or selection is done as stated in the table below:

	First Certification Audit	Subsequent Audits
Audits performed internally by multi-site producer/producer group with QMS		
Internal QMS Audit	Full QMS Audit	Full QMS Audit
Internal Farm Audit	Full coverage (all registered members/sites and product processing units)	Full coverage (all registered members/sites and product processing units)
ETKO Audit		
ETKO QMS Audit	Initial Certification Audit: (Full QMS Audit + Square Root of Registered Central Product Processing Units in Producer/Producer Group)(Performed before Farm Audit)	Recertification Audit: (Full QMS Audit + Square Root of Registered Central Product Processing Units in the Producer/Producer Group) (Performed annually and before the Farm Audit)
ETKO Unannounced QMS Audit	-	Recertification Audit: QMS audit is carried out unannounced to at least 10% of all multi-field producers/producer groups with QMS
ETKO Farm Inspection	Initial Certification Audit: Farm inspection is carried out on at least the square root of the total registered members/fields.	Recertification Audit: a) If there are non-conformities detected during the previous audit: the square root of the minimum number of registered current members/sites, b) If no non-conformities were detected during the previous inspection: the square root of the current registered members/sites minus the number of

		members/sites inspected in the previous surveillance inspection.
	ETKO surveillance audit during certificate validity: 50% of the square root of currently certified members/sites	ETKO surveillance audit during certificate validity: 50% of the square root of currently certified members/sites

Note: If the certificate has taken more than 12 months to expire, ETKO applies the initial certification audit rules.

- ETKO is conduct a QMS audit annually.

For the plants scope, if there is only one central PHU (i.e., the PHU is used by more than one producer group member), it shall be audited every year while in operation. When there is more than one central PHU, the square root of the total number of PHUs registered shall be audited while in operation.

Where product handling does not take place centrally but on the farms of the producer group members, this factor shall be taken into account when determining the sample of producer group members to be audited. The PHU is then audited within the specific producer group member on whose farm it is.

As part of ETKO audit, the CB shall audit a sample of all registered members/sites annually according to the table in section 5.1.2.3.1. (GG_GR_Rules_for_QMS_v6-6.1)

The purpose of the ETKO QMS audit is to evaluate whether the implemented QMS ensures that all components of the system comply with the certification requirements as defined by the applicable scope(s).
ETKO QMS Audit consists of two stages as follows:

a) QMS Audit (including central product processing units, if any)

b) Audit of registered producer group members/production/processing sites sampled as described in the table in this section

ETKO sends the audit plan to the QMS representative before the ETKO QMS audit.

3.4.1.2.4.1.1 CB audits of members/sites (including individual PHUs on farm)

a) ETKO auditor is audit the entire checklist of the applicable scope(s) during all ETKO audits.

b) ETKO audit per selected member/site is cover all accepted products, production processes, administrative sites, and, where applicable, the PHUs.

c) ETKO audits is carried out at each registered production site and their corresponding PHUs. Site production-related records (e.g., medicine/PPP application records) shall be present and audited on-site to cross-check them with the farm situation (products, interviews, stores, etc.).

3.4.1.2.4.1.1.1 Sampling of members/sites

a) At least the square root (or next whole number rounded up if there are any decimals) of the total number of the members/sites in the certification scope shall be audited before a certificate can be issued. For details on the difference in sampling between initial and subsequent ETKO audits, consult section 5.6.6.3.1.

b) Where sampling is applicable, ETKO farm audits shall be split into two separate visits during the certification cycle, with the aim of increasing the reliability of the system:

- Certification/Recertification audit (QMS, PHU(s), and members/sites)
- ETKO surveillance audit during validity of the certificate (members/sites)

c) The sample size of the following recertification audit by ETKO may be reduced to the square root of the actual number of the members/sites minus the number of members/sites audited during the previous ETKO surveillance audit as long as the following prerequisites are met:

- There are no non-conformances detected on the day of the previous member/site ETKO surveillance audit.
- The result of the QMS audit does not raise doubts about the robustness of the system.

d) The sample size may be increased by ETKO, for example if non-conformances are found during ETKO farm audits, to ensure adequate confidence in the QMS' conformance.

e) Selection of members/sites shall be based on the risk assessment carried out by the ETKO.

f) ETKO notification to the QMS representatives of specific names of members/sites to be sampled shall not exceed 48 hours (2 working days) before the member/site audit. . (GG_GR_Rules_for_QMS_v6-6.1.2)

ETKO QMS audit is carried out at the head office/administrative center and central product processing units of the multi-field producer/producer group with QMS.

The ETKO QMS audit takes at least six to eight hours, depending on the size of the multi-site producer/producer group with a QMS, and includes the following:

- Opening meeting with management
- Review of all relevant documents
- Evaluation of records
- Assessment of qualifications of internal QMS auditors and internal farm auditors
- Review of internal QMS audits and internal farm audits
- Review of traceability and mass balance requirements
- Interview with relevant personnel
- Closing meeting including the explanation of nonconformities detected at the QMS level

As part of the ETKO QMS audit, the results of external and internal audits are compared to evaluate whether the applicant's internal controls are appropriate.

The closing meeting of the entire ETKO QMS audit is held only after the QMS, Product Processing Units and producer group members/sites are audited. The entire QMS audit (including the audit of central product processing units and the audit of producer group members/sites) is completed within a maximum of one month. The final ETKO audit report includes all findings and final conclusions for all multi-site producers/producer groups with QMS and is presented during the closing meeting. The QMS representative signs the report or confirms its contents with an e-mail. 28 days are counted from this date to close the detected nonconformities.

The closing meeting date is the audit report date and is recorded in GLOBALG.A.P IT systems as the ETKO audit date. ETKO QMS auditor is present at the closing meeting.

The selection of members/sites to be audited is carried out by ETKO during the ETKO QMS audit (in-field audit) using criteria defined in a risk-based sampling procedure based on the structure of the multi-field producer/producer group with QMS and notified to the QMS representative.

The members/fields selected to be audited are notified to the QMS representative 48 hours (two business days) before the audit of the relevant member/field.

ETKO may increase the total number of registered members/sites sampled when necessary. The multi-site producer/producer group with a QMS has the right to appeal such a decision. Justifiable reasons for the increase will be any of the following:

- Failure to comply with significant QMS and/or product handling requirements affecting compliance of members/sites.
- Customer complaints, for example detection of pesticide residue above the legal limit
- Significant inconsistencies between internal audit reports and ETKO audit findings
- Possible need to determine whether findings at the farm level are structural.

- Number of products
- Types of activities in the field

Producers for plants according to the production type within the relevant scope; They are classified as greenhouse, open field production or perennial plants.
The minimum sample size is determined as the square root of the number of registered producers for each scope and production type. If there is a decimal place, the square root is rounded to the next whole number. During the ETKO audit of each of the selected members/sites, all registered products are inspected.
Audit of members/fields selected by sampling; It includes all scopes in which members/sites are registered, all production types, and all registered products produced by members/sites.
ETKO inspections of members/sites with more than one production type or scope are counted as one ETKO inspection for each scope or production type.
Risk factors, new manufacturers and random selection method are taken into account in the selection. Factors to be included in sampling for initial or subsequent audits include high operating risk, specific situation of the producer group member, number of products, previous certification body audit results, multi-site manufacturers with QMS, complaint records, differences in facility size, differences in shift patterns, final certification changes since inspection, environmental issues or variability, differences in language or cultural practices at sites, and geographic distribution. Producers who move from one producer group to another are more likely to be included in the sample of producer group members selected by ETKO.
If a producer group member operates a multi-site facility with a QMS, this will be merged with the producer group's central QMS, as there will be only one QMS for the producer group. In this case, the member of the producer group (legal entity) with multiple sites is taken into account when calculating the sample size, not the number of sites. If a producer group member is selected as part of the sampling, ETKO audits the square root of that member's field count during the ETKO audit. However, during the internal farm audit, all fields of the producer group member will be inspected.

3.4.1.2.4.1.2 Initial Inspection

This section applies to:

- Producer groups/Multisite producers where a QMS is implemented seeking GLOBALG.A.P. certification for the first time
- Producer groups/Multisite producers whit QMS who want to add a new product to an already existing GLOBALG.A.P. certificate.

When a producer group/multisite 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 CB audit, but a subsequent CB audit. In initial CB audits, the following requirements shall be fulfilled:

a) No CB audit can take place until the CB has accepted the applicant's registration.
b) The entire scope of certification shall be audited prior to issuing the certificate.
c) The producer group/multisite producer shall have records from the registration date onward or for at least three months before the initial CB audit takes place, whichever is longer.
d) Products that are already harvested/slaughtered/processed before registration with the CB cannot be included in the certificate.
e) Records that relate to harvest or product handling before the producer has registered with the CB are not valid.
(GG_GR_Rules_for_QMS_v6_0-6.2.1)

Before the certificate is issued, the entire scope of certification, the harvesting activities of each product to be included in the certification, as well as the product handling activities, if included, are inspected. Field work other than this can be inspected at a different time if possible, but this is not mandatory. GG_GR_Rules_for_plants 3.1.1

A product is included in the certification after all applicable Principles and Criteria have been inspected during the production process (i.e. it is not possible to certify a future production process). GG_GR_Rules_for_plants 3.1.1
If the inspection is carried out before harvest, it will not be possible to inspect some Principles and Criteria. In this case, a follow-up audit is carried out and the certificate is not issued until all Principles and Criteria applicable to the manufacturer have been audited and all non-conformities have been closed. GG_GR_Rules_for_plants 3.1.1
If the audit takes place after harvest, the producer must retain evidence of compliance with the Principles and Criteria for that harvest, otherwise it will not be possible to audit these Principles and Criteria and certification of those products cannot be made until the next harvest. GG_GR_Rules_for_plants 3.1.1
In cases where harvest is excluded, the inspection is carried out at a time when the relevant agricultural activities are carried out. GG_GR_Rules_for_plants 3.1.1
If the manufacturer requests certification for more than one product and not all of the products have the same seasonal timing, although all the requirements specified in this section are valid for the relevant products, the ETKO auditor must review all Principles and Principles applicable to each product in these groupings before the product(s) can be added to the certificate. It inspects the criteria and harvesting and product processing processes are inspected on-site for at least one product in each product group. GG_GR_Rules_for_plants 3.1.1

3.4.1.2.4.1.3 Subsequent Inspection

The entire scope of certification is audited annually by the ETKO prior to issuing the certificate.
In the case of producer groups/multisite producers with QMS that change CBs, the sample size shall not be reduced by the number of members/sites audited during the last surveillance CB audit by the outgoing CB.
Subsequent CB QMS audits (including central PHUs where applicable) of 10% of certified producer groups/multisite producers with QMS shall be done unannounced.
There shall be a minimum period of six months between two recertification audits.
No CB audit can take place until the CB has reregistered the producer group/multisite producer in the GLOBALG.A.P. IT systems. Reregistration shall be finalized before the date of the subsequent CB audit. .(GG_GR_Rules_for_QMS_v6_0-6.2.2)

If product handling is excluded from the scope of certification, the inspection is carried out every two years during the harvest season. At least one registered product per product group in the relevant year is inspected on-site during the harvest season. Product groupings are made based on similarities in production and harvesting processes and their risks. ETKO keeps in writing the justification for the selected audit timing and product groupings used. GG_GR_Rules_for_plants 3.1.2

Product groupings are based on the following process descriptions: GG_GR_Rules_for_plants 3.1.2

- Mechanical harvest (In cases where this is the only harvesting method, there is no obligation to make observations during harvest. Only the records regarding the operation of the machine and the harvester are checked before or after harvest.)
- Manual harvesting of products not classified as high risk in the GLOBALG.A.P product list
- Manual harvesting of products classified as high risk in the GLOBALG.A.P product list
- Packaging on site

If the producer does not undertake to continue the certification for the next cycle, ETKO ensures that a certificate does not cover more than one harvest and cultivation cycle of the same product harvested annually, for example by using the method of shortening the validity of the certificate. ETKO may determine the deadline for reconfirmation according to the harvest period of the product. GG_GR_Rules_for_plants 3.1.2
In cases where there is more than one product following each other, during the inspection, interviews with the producers and workers, examination of documents and records, etc. The production process of all products included in the scope of certification, including The manufacturer will maintain evidence of compliance with the applicable Principles and Criteria for all registered products. In years where the inspection does not need to be carried out during the harvest season and when the products do not have the same seasonal timing, ETKO selects a date when the relevant agricultural activities can be observed on site at least one of the products. If the difference between harvest seasons of

registered products is longer than four months or cannot be met during the extension of the certificate validity period, additional inspection is carried out for harvest-specific requirements. GG_GR_Rules_for_plants 3.1.2

Subsequent UK audits must be carried out four months before the original expiry date of the certificate and the validity period of the certificate within GLOBALG.A.P. In case of extension in the database system, it is carried out at any time when the relevant agricultural activities and/or processing (but not only storage) are carried out within the period up to four months after the original expiry date of the certificate. GG_GR_Rules_for_plants 3.1.2

The timing of the audit is determined as a period during which it can be ensured that all registered products are used in accordance with the certification requirements, even if they are not available at the time of the audit. Whenever possible, inspections are not carried out out of season or when farming activities are at a minimum. GG_GR_Rules_for_plants 3.1.2

3.4.1.2.4.2 ETKO surveillance audit during the Certificate Validity Process GG_GR_Rules_for_CBs 7.3.3.3

Certification/Recertification audits and ETKO surveillance audits are carried out in two separate visits, at least 30 days apart from each other.

ETKO surveillance audits are carried out at least half the square root of the actual number of certified members/sites.

In all cases, the members/sites selected for auditing are notified to the QMS representative 48 hours (two business days) before the audit of the relevant member/site.

3.4.1.2.5 ETKO inspection of Product Processing Units (producer group / multi-site producer with QMS) GG_GR_Rules_for_CBs 7.3.4

ETKO audits centralized product processing units (i.e. where multiple members/sites use the same product processing unit) using the combined QMS and product processing checklist provided by GLOBALG.A.P.

At least the square root of the number of central product processing units in the period in which production is carried out is inspected annually.

In cases where product processing is carried out not centrally but at the production sites of each producer group member, this factor is taken into account when determining the sample of the producer group members to be inspected. In this case, ETKO uses the farm inspection checklist, including product handling requirements applicable to each member of the producer group being inspected.

During internal audits, each product processing unit will be inspected.

3.4.1.3 Unannounced ETKO Audit GG_GR_Rules_for_CBs 7.4

During subsequent ETKO audits, at least 10% of all certificate holders certified by ETKO are audited unannounced.

The choice of the 10% rate will not only take into account total numbers, but also geography, legislation (where several jurisdictions are covered by ETKO), crop type, compliance history etc. It will also be based on possible risks and factors such as.

The 10% rate is calculated over a 12-month period. The number of unannounced ETKO audits per 12-month period reflects 10% of the total certificates issued, with and without QMS.

All countries within the scope of ETKO's certification are included in the selection of the 10% rate.

At least one unannounced ETKO audit is conducted per year per scope and option (with and without QMS).

In case of having only one Option 2/Option 1 manufacturer with QMS; An unannounced ETKO QMS audit is carried out at least every two years.

Notification of an unannounced ETKO inspection does not exceed 48 hours (two business days). In the exceptional case where it is not possible for the certificate holder to accept the proposed date (for medical or other justified reasons), the certificate holder is given another chance to be informed about an unannounced ETKO audit. Objective evidence of the justification is maintained in the file (for example, a medical document).

In cases where there is no evidence showing justification, the producer will be suspended if he does not accept the unannounced ETKO inspection. If the first proposed date is not accepted, a written warning will be given to the manufacturer, regardless of whether the rejection is justified or not. The producer receives another 48-hour notice for

a new unannounced ETKO inspection. If this inspection cannot be carried out, all products (i.e. the certificate) will be suspended. The hanger is removed when an unannounced ETKO inspection is carried out.
During registration, the certificate holder may indicate a 15-day period during which he/she will not be available for an unannounced ETKO audit.

3.4.1.4 Harvest Exclusion GG_GR_Rules_for_plants 2.2

If the product is sold in the field before harvest and the buyer is responsible for the harvest, the principles and criteria regarding the harvest are excluded from the scope of certification.
In all cases where the product belongs to the producer, whether the harvest is carried out by the producer or by outsourcing, all principles and criteria regarding harvest are included in the scope of ETKO audit and certification.
"Harvest exclusion" applies when the product no longer belongs to the producer before the start of harvest and the producer has no control over the harvesting process. This exception does not apply if the harvest is outsourced to another legal entity by the producer.
The producer will apply for harvest exemption per product with detailed justification during registration.
ETKO excludes the harvesting process only if there is a contract between the producer and the buyer stating that the legal entity/buyer undertaking the harvest will do all of the following:

- Taking ownership of the product before harvest
- Assuming responsibility for ensuring that harvesting occurs only after the pre-harvest interval is observed.
- Processing of the product after harvest (not only during harvest)
- Purchasing the entire product (If the producer harvests a certain part of the product and sells another part before harvest, "harvest exclusion" is not possible)

If the producer does not recognize the recipient at the time of registration with GLOBALG.A.P, the following shall be provided:

- Declaration of the producer to inform the legal entity/buyer who will carry out the harvest of the pre-harvest interval
- Signing the contract specified in this section with the buyer as soon as the legal entity/buyer that will carry out the harvest is determined.

If harvesting is excluded for a product, product processing is also excluded for that product.

3.4.1.5 Post-Harvest Product Handling Exclusion GG_GR_Rules_for_plants 2.3

Product processing includes any post-harvest handling of products such as storage, chemical treatment, pruning, washing, or other operations in which the harvested product may be in physical contact with other materials or substances. Details of specific processes for each product are included in the checklist notes.
If the product is waiting to be collected at the collection point on the farm during the day, this is not considered storage.
If the product is stored overnight or longer, this is considered storage and the relevant requirements apply.
If product processing does not take place on the property of the manufacturer, this is declared per product during registration and indicated in the certificate.
When harvest is excluded, the post-harvest product processing part is not automatically excluded.
The post-harvest product handling portion is also included in the harvest exclusion if the product was owned by the producer at the time of processing, unless there is written evidence that the producer had no control over packaging/handling/storage/labeling, the product was not returned to the producer, and the producer is no longer responsible for the product.
If the product processing unit already has a post-farm food safety certificate recognized by GFSI (www.mygfsi.com) for the scope of BII "Agriculture of grains and legumes" and/or BIII "Pre-processing operations of plant products", the ETKO auditor will, if possible, carry out post-harvest operations as well as The sequence controls separation and traceability as a minimum. If the Product Processing Unit is covered by a PHA certification (e.g. subcontracted Product Processing

Unit), the IFA Principles and Criteria for product processing are considered covered. The Product Processing Unit is included in the IFA certification annex without further monitoring of traceability or post-harvest handling requirements. If a producer processes products not on the farm but in the product processing unit of another producer with GLOBALG.A.P certification, ETKO accepts the certificate issued by the other certification body.

ETKO audit report includes the following:

- All data fields marked as required in the GLOBALGAP Online Audit Hub (previous audit notes)
- Scope of audit: Company, field, product processing unit and product information according to GLOBALG.A.P registration data requirements
- Calculation of the total applicable Major Must, Minor Must and Recommendation Principles and Criteria and the percentage of compliance achieved for each level
- List of non-compliances, non-conformities and follow-up actions agreed with the manufacturer (including relevant Principles and Criteria, details of findings based on objective evidence, deadline for corrective action, reference to objective evidence for the implementation of corrective action, evaluation results of corrective action (open/closed) and (contains relevant dates of activities and a description of the corrective action agreed with the manufacturer)
- Conclusion on whether the manufacturer is compliant or not

Whenever possible, GLOBALG.A.P. It will use the audit report template published by database systems.
The audit report forms the basis for the decision on issuing a certificate.
A fully completed audit checklist includes all applicable Principles and Criteria, required comments, findings, and objective evidence of the implementation of corrections and/or corrective actions.
All production facilities of the Option 1 multi-site manufacturer without QMS, where its registered products are produced, are inspected before the certificate is issued. In this case, even if a separate checklist is used for each manufacturer, it includes all registered facilities and the results are combined and reported in a single checklist that summarizes the result for all legal entities (manufacturers).
If Option 1 with QMS is for a multi-site producer or producer group, a checklist is completed for the QMS and per sampled member/site/product handling unit and the result is not summarized but reported separately for each member/site, product handling unit and QMS. The result for each member/field is approved by the member/field/product processing unit manager by signing the checklist or a report containing the date and duration.
In both cases, upon complete completion of the ETKO audit process, a full written ETKO report is prepared, summarizing the audit activity undertaken, providing objective evidence and information on how the manufacturer complies with the requirements of the standard, and listing any identified non-compliances and/or non-conformities, if any.
The individual producer or producer group representative signs or approves the report during the closing meeting, which includes the ETKO audit result, the name of the ETKO auditor, the scope of the ETKO audit, the inspected sites, the producer group members, facilities, the percentage of compliance for different Principles and Criteria levels, and the findings. Documentary or electronic confirmation from the manufacturer is considered equivalent to the manufacturer's signature. In case of a digital signature, it will be a real and valid signature. (i.e. .JPG images are not considered valid signatures).
Additionally, if requested by the manufacturer, ETKO will submit the complete inspection report, including the completed inspection checklist, within five business days after the certification decision, after ETKO's internal technical review. Externally distributed reports (e.g., audit report, corrective action report) and completed audit checklist are set to be write-protected or otherwise protected prior to distribution to prevent unauthorized modification or tampering.
GLOBALG.A.P. automatically generated audit report (including checklist) This report is used when it can be obtained from database systems.
When required by the GLOBALG.A.P Secretariat, ETKO audit report and completed audit checklist are available at GLOBALG.A.P. It is uploaded to database systems.

Complaints or objections can be made in accordance with the complaint procedure shared by ETKO on its website. If ETKO does not address the complaint or objection and/or does not take the necessary actions regarding the issue, the complaint can be forwarded to the GLOBALG.A.P Secretariat using the GLOBALG.A.P incident/complaint form available on the GLOBALG.A.P website (www.globalgap.org).

4. SUPPLY CHAIN CERTIFICATION PROCESS CoC GR v6.1

The Supply Chain standard principles are as follows:

1. A management structure is prepared that addresses the supply chain standard requirements, including documented procedures, processes, systems and personnel training appropriate to the size, type and complexity of the activities. Self-assessment and mass balance calculation are carried out at least once a year. Records of suppliers, subcontractors, purchasing, storage and sales are kept.
2. Input and output verification of the certification status of direct suppliers (one step back) in GLOBALG.A.P. IT systems is carried out. Verification includes matching the quantities of certified products received with the quantities stated in the delivery documents and purchase orders and filing a complaint with the GLOBALG.A.P. Secretariat each time a supplier fails the GLOBALG.A.P. certification verification for the supply chain.
3. The traceability system based on the warehouse management system developed by each company in its own way aims to ensure the traceability of the final product to one (identity protection method) or more than one (separation method) certified producer.
4. Identification and labeling of outgoing shipments (e.g. shipping documents) and logistic units (e.g. pallets), as well as outgoing commercial products (boxes, cases, etc.) and retail consumer products (containers, bags, nets, stretch film, etc.) are carried out. Bulk, loose or itemized (detailed) retail consumer products with visual elements of the GGN label are identified on the store counter.

The basic concept of the supply chain standard is illustrated in the following supply chain example:

<table>
<tr><th>IFA</th><th colspan="5">Tedarik Zinciri</th></tr>
<tr><td colspan="6"> 
</td></tr>
<tr><td>In case of parallel ownership: the product is labeled with the manufacturer's GGN Labeling on the product is mandatory.</td><td>CoC Company Number # 1
+
Traceability code*
and/or
Manufacturer's GGN</td><td rowspan="2">Broker (Medium) does not label (label does not change)</td><td>CoC Company Number # 3
+
Traceability code*
and/or
Manufacturer's GGN</td><td rowspan="2">Broker (Medium) does not label (label does not change)</td><td>GGN label logo displayed with bulk product
+
CoC Company #3 Number and/or GGN of manufacturers</td></tr>
<tr><td>The product is labeled with the manufacturer's GGN.
Labeling on the product is voluntary</td><td>CoC Company Number # 1
and/or
Manufacturer's GGN</td><td>CoC Company Number # 3
and/or
Manufacturer's GGN</td><td>N/A</td></tr>
</table>

Certificate holder's GGN + "xx kg GLOBALG.A.P certified apples" Mandatory in transaction documents (e.g. sales invoices)	CoC Company Number # 1 + "xx kg GLOBALG.A.P certified apples"	CoC Company Number # 2 + "xx kg GLOBALG.A.P certified apples"	CoC Company Number # 3 + "xx kg GLOBALG.A.P certified apples"	CoC Company Number # 3 + "xx kg GLOBALG.A.P certified apples"	N/A (product sold to end consumer)

*The traceability code identifies the GGN of the individual producer or the GGN of the producer group for each batch.

The scope of GLOBALG.A.P. Supply Chain certification includes the following:
According to the CoC standard, the applicant can apply for certification under a single option, namely individual certification with three sub-options. Note: Group certification (Option 2) is not allowed. However, a producer group with an IFA certificate can obtain GLOBALG.A.P Supply Chain certification. In this case, the Option 2 certificate holder obtains the GLOBALG.A.P Supply Chain certification as a single legal entity. A member of the producer group cannot apply for Supply Chain certification within its own producer group. Within a producer group, the quality management system (QMS) must ensure traceability and segregation.

- Option 1 – Individual Certification:
  - An individual producer/company applies for Supply Chain certification.
  - Once certified, the individual producer/company becomes a certificate holder.

- Option 1 – Single Site
  - An individual producer/company with a single processing, handling, storage and end-consumer sales or administrative site is certified as a single legal entity with a single Supply Chain Number.

- Option 1 – Multi-Site
  - A manufacturer/company has multiple processing, handling, storage, end-user sales or administrative sites that do not function as separate legal entities.
  - In the case of multi-site certification, all sites where certified products are sold, processed, handled, stored or managed are considered internal and are audited and certified by a CB. This also applies to subcontractors and broker administrative sites that do not touch the product.
  - Sampling of sites is not permitted during internal and CB audits, except for Retail stores and restaurants which are audited in accordance with the Table below.
  - All sites are registered as a single legal entity with a single Supply Chain Number.

- Option 1 – Multi-Site for Franchise Retail Stores and Restaurant Chains
  - An individual firm owns a franchise network of retail stores or restaurants. The individual retail stores and restaurants (sites) operate as separate legal entities.
  - In the case of multi-site certification, all sites where certified products are sold, processed, handled, stored or administratively managed are audited internally. This applies equally to all subcontractors of such sites.
  - Sampling of sites for UK audits is permitted for stores, distribution centers and restaurants in accordance with the table below.
  - The selection process will include randomly selected sites and ensure that the overall sample selected is representative of the multiple sites being assessed and covers the widest possible range in terms of:

- Geographic distribution
- Size of participating sites (number of employees)
- Number of activities and/or products

- ETKO will avoid visiting the same participating sites in consecutive audits unless there are clear and justified reasons to do so (for example, if deemed necessary to assess corrective action requests or complaints received against the organization).
- In addition to the selected participating sites, the head office will be audited by ETKO during each audit.
  - At least 10% of the sites audited will be audited as an unannounced CB audit.
  - At least one traceability check will be conducted per site.
- If more than three Major Must non-conformances are identified during the ETKO audit, the unannounced sample size will be increased to 50% and two traceability tests will be conducted per site during the next ETKO audit to maintain the effectiveness of the implemented corrective actions.
- All sites are registered as a single legal entity with a single Supply Chain Number.

Total Site Count	Number of sites to be visited during a CB audit	
	Initial CB Audit	Subsequent CB Audit
1 - 3	1	1
4 – 6	2	1
7 – 9	3	2
10 – 16	3	2
17 – 25	4	2
26 – 36	4	2
37 – 49	4	2
50 – 64	5	3
65 – 84	5	3
85 – 100	5	3
101 – 121	6	4
122 – 144	6	4
145 – 169	7	5
170 – 196	7	5
197 – 225	8	5
226 – 256	8	5
257 – 289	9	6
290 – 324	9	6
325 – 361	10	6
362 – 400	10	6
401 – 441	11	6
442 – 484	11	6
485 – 529	12	7

530 – 576	12	7
577 – 625	13	7
626 – 676	13	7
677 – 729	14	8
730 – 784	14	8
785 – 841	15	8
842 – 900	15	8
901 – 961	16	8
962 – 1024	16	8
1024'den fazla	Multiply the square root by 0.5 and round up.	Multiply the square root by 0.25 and round up.

4.1 Application and Registration Process

4.1.1 Company Registration

ETKO shall establish and explain its detailed fee structure to its potential customers and shall indicate the relevant GLOBALG.A.P system participation fee paid by ETKO to the GLOBALG.A.P Secretariat for each customer. GG_GR_Rules_for_CBs 6.2.b

The GLOBALG.A.P. Agreement (GP 21 F 02) and the GLOBALG.A.P. Sub-License and Certification Agreement (GP 23 F 04) clarify the certification rules, responsibilities of the producer/producer group and ETKO, certification processes, products belonging to the producer, addresses and fee structure, including the system participation fee paid to the GLOBALG.A.P. Secretariat, and are signed between ETKO and the producer/producer group. (GP 21 F 02 and GP 23 F 04)

The applicant undertakes to comply with the certification requirements at all times, to submit data updates to ETKO and to pay the applicable fees determined by GLOBALG.A.P. and ETKO, after signing the GLOBALG.A.P. Sub-License and Certification Agreement (GP 23 F 04), the applicant undertakes to comply with the certification requirements, to submit data updates to ETKO and to pay the applicable fees determined by GLOBALG.A.P. and ETKO. All sites to be certified with a unique Supply Chain Number determined in the database shall be registered in the GLOBALG.A.P. Database. GG_GR_Rules_for_CBs 6.1.a

The Supply Chain Number consists of the prefix “CoC” and a 13-digit number excluding GLOBALG.A.P logos/trademarks. It is unique for each company/other legal entity in the GLOBALG.A.P system (GLOBALG.A.P IT systems). If a company already has an IFA and/or Compound Feed Manufacturing (CFM) certificate and therefore an assigned GGN, the 13-digit Supply Chain Number will be the same as the GGN. The company will use the prefix “CoC” when referring to products not covered by GLOBALG.A.P certificates for IFA and/or CFM. The Supply Chain Number identifies a registered or certified Supply Chain company that processes, handles, stores, sells or trades the certified product after the farm.

ETKO shall ensure that the applicant is a member of the GLOBALG.A.P. It is the party responsible for recording data in systems, updating data, and collecting fees.

During registration, the producer defines the scope of the certification and completes the preparations for the audit in accordance with the scope. GG_GR_Rules_for_CBs 7.1

Only individual producers can apply to register their site for GLOBALG.A.P certification. GG_GR_Rules_for_CBs 6.1.c

The scope of the product is linked to the location where the product is produced. Products produced in an unregistered location are not certified, and similarly, uncertified products processed in a registered location are not certified.GG_GR_Rules_for_CBs 6.1.b

A registered producer is granted a certificate and sublicense for the production locations where the products are produced (and packaged or processed, if applicable) and the declared products.GG_GR_Rules_for_CBs 6.1.d

Only the legal certificate holder (i.e. the legal entity specified in the certificate) can market products by referring to the GLOBALG.A.P certificate. Members of the producer group are not legal certificate holders. Therefore, they cannot market products on their own behalf based on the producer group certificate. All products sold, regardless of the certificate, will be registered in the mass balance system.GG_GR_Rules_for_CBs 6.1.e

ETKO and the producer agree to the terms of the "notification notification", which includes ETKO's commitment to confirm receipt of the official application for (initial) registration within 28 calendar days. ETKO's approval includes a unique Supply Chain Number generated by ETKO in the GLOBALG.A.P. Database systems. GG_GR_Rules_for_CBs 6.2.a

ETKO asks whether a producer has previously held a GLOBALG.A.P identification number and verifies that the producer complies with the transfer procedure between certification bodies.GG_GR_Rules_for_CBs 6.2.e

In case a producer wants to transfer from another certification body to ETKO, ETKO first verifies the status of this producer in the GLOBALG.A.P. Database system. GG_GR_Rules_for_CBs 6.2.f

In case a producer also receives services from a certification body other than ETKO, ETKO conducts its audits independently of the other certification body:GG_GR_Rules_for_CBs 6.2.g

* In case ETKO imposes a sanction on this producer, it communicates with all certification bodies working with that producer regarding the sanction and, if necessary, the details of the actions to be taken by all certification bodies.

* While the producer is responsible for communicating a sanction to all certification bodies working with that producer, it can also be carried out by the GLOBALG.A.P Secretariat.

Producers shall provide this data to ETKO during the application and in case of any changes.GG_GR_Rules_for_CBs 6.2.h

ETKO records all information requested in the "GLOBALG.A.P data recording requirements" during database registration. GG_GR_Rules_for_CBs 6.2.1.a

ETKO keeps the GLOBALG.A.P. Database system up-to-date as described on the GLOBALG.A.P. Database system page (wiki.globalgap.org).GG_GR_Rules_for_CBs 6.2.1.c

Privacy, data usage and data publication:

(i) At the time of registration, applicants give written permission to the GLOBALG.A.P Secretariat/FoodPLUS GmbH and the CBs to use the registration data for internal processes and enforcement procedures.

(ii) All data in the GLOBALG.A.P IT systems may be used by the GLOBALG.A.P Secretariat and ETKO. These data may be used for internal processes and enforcement procedures.

(iii) The minimum and mandatory data publication level is defined in the GLOBALG.A.P data access rules available at www.globalgap.org. The following data are included at a minimum level and are publicly available: GGN, Supply Chain Number, GLOBALG.A.P certificate number, program, version, option, CB, accreditation body (EU), scope, products and certification status, scope-related attributes (e.g. completion of labeling), certificate holder company name and address, site addresses and certificate validity.

(iv) If an applicant does not agree to the minimum data publication level, the applicant is not in agreement with the sublicense and certification agreement and cannot be certified.

h) The duration of the service agreement between ETKO and the producer/company is determined in the sublicense and certification agreement.

i) The applicant producer/company:

(i) Is not allowed to register products within a scope (plants, livestock or aquaculture) with different CBs, but may use different CBs for different scopes (e.g., apples/plants with one CB and salmon/aquaculture with another CB or both products with the same CB). Consequently, the applicant is not allowed to register the same scope (product) with different CBs.

(ii) Is not allowed to register a site more than once for the same scope.
(iii) Is not allowed to register a site with different companies at the same time (i.e., a site owned or owned by a company cannot be re-registered as a separate and independent company).
(iv) It is not permitted to register sites in different countries within any one UK. The GLOBALG.A.P Secretariat may grant exceptions on a case-by-case basis or within NIGs (if applicable).

Registration with a New CB:
In the event that a previously registered applicant changes CB or applies to a new CB for certification under a different scope, the applicant shall notify the new CB of the existing GGN or Supply Chain Number assigned by the GLOBALG.A.P Secretariat. Failure to do so will result in an additional service fee of €100 per applicant in addition to the registration fee.

Sanctioned certificate holders may not change their CB until the preceding CB closes the relevant non-compliance or the sanction penalty period expires.

4.1.2 Acceptance of Company Registration
In order for registration to be accepted, the applicant must meet all the following conditions:
(i) The applicant must submit the relevant application to ETKO, including all required information.
(ii) The applicant must formally undertake to comply with the obligations set out above.
(iii) The applicant must accept (sign) the sublicense and certification agreement with ETKO; or the applicant must clearly confirm receipt and inclusion of the sublicense and certification agreement by signature in the service contract/agreement with ETKO and ETKO must deliver a copy of the sublicense and certification agreement to the company/manufacturer.
(iv) If the GGN label is used, the applicant must sign the GGN label license agreement.
(v) The applicant must be assigned a Supply Chain Number.
(vi) The applicant must pay the GLOBALG.A.P registration fee as described in the current GLOBALG.A.P fee schedule (available on the GLOBALG.A.P website).

The registration and acceptance process must be completed prior to the CB audit.

For initial registration: ETKO will approve or reject the acceptance of the application and provide the applicant with the Supply Chain Number within 28 calendar days of receiving the completed application.4.1.3 Belgelendirme Kapsamı ve Sınırlamalar

4.1.3.1 Scope of Certification
The scope of the Supply Chain certification product includes the IFA scopes. All products specified in the GLOBALG.A.P product list published on the GLOBALG.A.P website can be included in the scope of the Supply Chain certification.
The scope of the Supply Chain certification can include a product that is not grown/produced on the farm (i.e. purchased from outside) and where the producer acts as a trader or service provider. For example, it is possible to certify a producer group's cultivation and packaging of apples under the IFA standard and the packaging of purchased pears under the Supply Chain standard.
For fruits and vegetables and compostable products, the scope of the Supply Chain certification can include products processed by methods such as cutting, slicing, dicing, freezing and/or quick freezing (IQF) to the extent that the original product remains visibly recognizable. For example, sliced mushrooms, diced pumpkin, cut melon, frozen peas, etc. can be certified; orange juice, applesauce, vegetable soups, etc. cannot be certified. In the case of salad mix or other mixed products (in the fruit and vegetable product category), all products included shall be GLOBALG.A.P certified.

All sites where products originating from certified production of fruits and vegetables are processed (cut, sliced, diced and/or frozen) must be certified according to a GFSI recognized food safety program, an accredited Codex Alimentarius based HACCP certification system (third party certification) or a GLOBALG.A.P recognized food safety standard in order to certify the product and process for the Supply Chain during the ETKO audit. Only the GFSI recognized food safety certificate is displayed on the GLOBALG.A.P Supply Chain certificate.

4.1.3.2 Manufacturers/Companies in Scope

Any party in the supply chain that has legal title and/or physical control over a certified product is within the scope of this standard.

(i) Companies are considered legal owners if they issue invoices for the sale of certified products and collect payment for the sale of certified products or if they can demonstrate financial ownership of certified materials based on other documentation (such as internal transfer slips, contracts or deeds).
(ii) Physical control occurs whether the company legally owns the product but physically takes possession of it (acting as a subcontractor) at any point in the supply chain.

All parties in the supply chain who have legal title to certified products and perform at least one of the following activities are certified against this standard:
(i) Selling or trading IFA/Supply Chain certified products that have a GLOBALG.A.P claim on their sales documents
(ii) Packaging and/or labeling products with a GGN, Supply Chain Number or visual elements of the GGN label
(iii) Changing the composition of products sold with a GLOBALG.A.P claim (e.g. processing, cutting, packaging in different batches and mixing products from different manufacturers) or assigning them a new identity (repackaging, relabelling, etc.)
(iv) Selling bulk products with visual elements of the GGN label (such parties include retail stores and restaurants that commercialize bulk products with visual elements of the GGN label)

It is recommended that subcontracting companies to perform the above activities without legal title to the product at any stage (only physical control of the product) be certified against the Supply Chain standard. In order for ETKO to schedule audits at all relevant facilities (subcontracted storage, labeling, processing facilities, etc.), subcontracted activities covered by the Supply Chain certificate must be declared at registration or when a subcontractor or subcontracted activity is added. Subcontractors must be audited by ETKO to avoid the risk of misidentification, substitution or dilution of certified products with non-certified products. Non-ownership contractors may choose to be certified if they wish; however, they should not describe products as certified unless the legal owner of the products holds the Supply Chain certificate.

Traders or intermediaries who trade (purchase and sell) certified products, including producers acting as traders for certified products purchased externally and not grown on farms, are certified according to this standard. This includes retail store distribution centres when selling products with a GLOBALG.A.P claim to other companies outside the retail store network.
(i) Traders' and intermediaries' sites are classified by ETKO according to the risk of misidentification, substitution or dilution of certified products with non-certified products.
(ii) Traders and intermediaries who operate directly or through subcontractors in the (re)processing, (re)packaging and/or (re)labelling of certified products, directly or through subcontractors in the storage and handling of bulk products (unpackaged, unsealed or unlabelled) or directly or through subcontractors in the storage and handling of packaged but unlabelled products are classified as high risk.
(iii) Traders and intermediaries operating directly or through subcontractors in the cross-docking, storage and/or handling of consumer-ready, packaged and tamper-evident products are classified as low risk.

(iv) Traders and intermediaries who legally possess certified products but do not physically handle them are classified as low risk.
(v) All traders and intermediaries shall be certified. Those classified as low risk (i.e. intermediaries, traders and exporters who do not store, handle or re-label the product and do not have physical contact with the product) are entitled to an administrative audit that can be carried out remotely.

In general, all manufacturers/companies trading in unlabelled products and/or labelling/re-labelling the product with the GGN and/or CoC Number and/or visual elements of the GGN label shall be certified according to this standard.

4.1.3.3 Manufacturers/Companies Not Included
The following are not subject to Supply Chain audits and certification:
IFA certified production processes are outside the scope of this standard. For example, it is not possible for a producer to be certified to grow and pack apples under both IFA and Supply Chain standards. For producers who engage in parallel ownership or parallel production of both certified and non-certified products, traceability and separation requirements are already included in the scope of IFA certification.

Companies that trade or process products originating from certified companies or producers, but never identify or sell these products with a certified or GLOBALG.A.P claim, do not require Supply Chain certification. In this case, the chain of custody ends.

Retailers who purchase, process and sell certified products only in consumer-ready, break-resistant packaging to end consumers do not require Supply Chain certification. Note: This includes wholesale self-service stores' own distribution sites (e.g. wholesale cash and carry); does not include a firm acting as a merchant in the distribution center supply chain, i.e., a firm that sells products to other firms outside the retailer network.

Freight forwarding agents (including sea or air freight) that do not have certified products are outside the scope of this standard. Examples include firms responsible for preparing shipping and export documents, booking cargo space, negotiating freight rates, consolidating freight, insurance of cargo, customs clearance, and/or filing insurance claims.

4.1.3.4 Burden of Proof
If the GLOBALG.A.P Secretariat receives information from a GLOBALG.A.P certified entity that has a potential impact on the GLOBALG.A.P claim (such as false labelling, false claims, exceeded maximum residue limit, microbial contamination, etc.), the certified entity has the responsibility to refute the information by verifying compliance with the Supply Chain standard and providing evidence.

In such cases, one of the following applies:
(i) If the ETKO conducts an investigation, the findings and actions taken will be reported to the GLOBALG.A.P Secretariat.
(ii) If the retailer or owner of the product conducts its own investigation, it will report the findings back to the GLOBALG.A.P Secretariat, which will then inform ETKO to take appropriate action.

GLOBALG.A.P will give the certified entity a specified period within which to do so. If ETKO deems the evidence provided by the legal entity insufficient, ETKO will impose a sanction and follow the normal sanction procedures described in the ETKO Non-Compliance Rating Guide.

Certified entities must have full traceability, including mass balance, separation and other records required to verify and control the case. If the evidence includes laboratory analysis, accredited laboratories (ISO/IEC 17025) and independent sampling will be used.

4.2 Review of Application

Application documents and/or previous audit documents are reviewed prior to the agreed audit date and a preliminary audit of the applicant is conducted. During the review of the application package, ETKO evaluates the application documents and information obtained and ensures the following;17065-7.3.1

a) The information regarding the manufacturer/producer group and the product is sufficient to perform the certification processes,
b) Any known differences of understanding between ETKO and the manufacturer/producer group, including agreement on relevant standards or other official documents, are resolved,
c) The requested certification scope is defined,
d) The tools are available to perform all audit activities,
e) In order to ensure that ETKO has the necessary competence and means to perform the certification activity, the review of the information and documents in the application package is completed and if corrective action is required, it is reported to the manufacturer/producer group.

When the producer/producer group's certification request includes a product type or a normative document or a certification scope for which ETKO has no prior experience, ETKO identifies and evaluates these issues and informs the applicant accordingly. 17065-7.3.2 If the information on the conditions, characteristics and technology of a product is sufficient to understand the conditions, characteristics and technology of another product, the products may be considered as the same type. 17065-7.3.2

4.3 Audit Process

4.3.1 Option 1 – Audit Process for Single Site and Multi-Site Producers

To obtain certification, a registered company first self-assesses and then is audited by ETKO.

This section applies to applicants with a single legal entity (individual producer, producer group or firm) and a single site or multiple sites that are not separate legal entities and all centrally managed by the applicant.

The audits conducted before the GLOBALG.A.P Supply Chain certificate is issued (initial CB audit) and annually thereafter (subsequent CB audit) are as follows:

Üretici/firma tarafından Öz-Değerlendirme	All scope (all registered sites)
BK Denetimi	Announced UK Audit of all scope for all registered sites. Note: For Option 1 Multiple Sites for Retail Stores and Restaurant Chains and Option 1 Multiple Sites for Retail Stores and Restaurant Chains, sampling of sites is applied as indicated in the previous table.
	Unannounced UK Audit of at least 10% of all certified manufacturers/companies (GLOBALG.A.P Supply Chain certificate holders).

4.3.1.1 Self-Assessment

Self-assessment;
(i) Covers all sites, products and processes within the scope of certification and is carried out in accordance with the requirements set out at the applicable control points.
(ii) Is carried out under the responsibility of the applicant/certified company.

(iii) Is carried out against the full checklist of all relevant scope(s) and registered sites prior to the initial CB audit and at least annually prior to any subsequent CB audits as announced thereafter, and the completed checklist is always available on site for review.
(iv) Includes recording of comments, evidence, corrective actions and positive findings for each control point during the self-assessment.

4.3.1.2 CB Audit
CB audit (Informed or Uninformed) is conducted by an ETKO auditor.
ETKO audits the full checklist (Major Musts, Minor Musts and Recommendations) of the applicable scope(s).

In all CB audits, comments, evidence, corrective actions and positive findings arising for each control point are recorded.

4.3.1.2.1 Announced CB Audit
Each company shall undergo an announced BK audit and then an annual BK audit.
The BK audit covers:
(i) All GLOBALG.A.P certified products
(ii) All manufacturing processes and sites that handle or process certified products
Note: For Option 1 Retail Stores and Restaurant Chains and Option 1 Franchise Retail Stores and Restaurant Chains, sampling of sites shall be applied as indicated in the previous table.

4.3.1.2.2 Unannounced CB Inspection
ETKO conducts additional unannounced inspections annually on at least 10% of all manufacturers/companies it certifies per scope.
ETKO inspects all applicable control points. Any findings (e.g. non-compliance) are treated in the same way as those found during an announced BK inspection.
ETKO informs the company 48 hours (two working days) before the intended inspection. In the exceptional case where it is impossible for the company to accept the proposed date (for medical or other justified reasons), the company has another chance to be informed about an unannounced BK inspection. If the first proposed date is not accepted, the company receives a written warning. The company receives another 48-hour notice for another visit. If the unannounced BK inspection cannot be carried out for unjustified reasons, a suspension sanction is applied.
The GLOBALG.A.P Secretariat may request that ETKO include in the inspection targeted traceability checks on products labeled with the visual elements of the GGN label in the 10% unannounced BK inspections.
In case an Option 1 Franchise Retail Stores and Restaurant Chain is selected to conduct an unannounced audit, the number of sites to be audited shall apply as specified in the “Subsequent UK audit” column of the previous table.

4.3.1.3 Audit Timing
The Self-Assessment and CB Audit shall be conducted at a time when handling, processing, storage and/or other relevant activities are underway. Audit timing shall be determined to ensure that ETKO has assurance that all products are being processed in accordance with the certification requirements, even if they are not present at the time of the audit. CB audits shall be avoided during off-season or when activity is minimal.

4.3.1.3.1 Initial CB Audit
The Initial Audit applies to all applicants seeking GLOBALG.A.P certification for the first time, organizations that are already certified but are transferring to ETKO from another CB, and organizations that are already certified that wish to add new process types to their GLOBALG.A.P Supply Chain certification.
No CB audit shall be conducted until ETKO has accepted the applicant’s registration.
In the first CB audit, each process for products to be sold as certified is fully audited (all applicable control points are

verified) before the GLOBALG.A.P Supply Chain certificate is issued.

If the applicant has not yet started trading with certified products, the system is demonstrated with samples, trial tests, etc.

The applicant must have records from the date of registration or at least three months before the first CB audits are carried out, and ETKO audits these records.

4.3.1.3.2 Subsequent CB Audit

GLOBALG.A.P certified products and/or related operational records shall be available at the time of the CB audit. GLOBALG.A.P certified products and/or product processing facilities shall be inspected by ETKO while in operation at least once every three years.

Subsequent CB audits may be conducted at any time during an "audit window" spanning an eight-month period: four months prior to the original expiration date of the GLOBALG.A.P Supply Chain certificate, and (only if ETKO extends the validity of the certificate in the GLOBALG.A.P IT systems) up to four months after the original expiration date of the GLOBALG.A.P Supply Chain certificate.

Example: initial certificate date: 14 February 2023 (expiration date: 13 February 2024). The second CB audit can be conducted at any time between October 14, 2023 and June 13, 2024 if the certificate validity is being extended. There must be a minimum of six months between two CB audits for recertification.

4.3.1.4 Extension of Scope of Certification

The scope of the GLOBALG.A.P Supply Chain certificate (i.e. the processes and products included) may be changed during the validity of the certificate.

The certified company shall inform ETKO of any changes that affect the scope of the GLOBALG.A.P Supply Chain certificate. This may include the addition or removal of processes, products, scopes and locations/sites.

The certified company shall conduct a self-assessment covering the changes.

ETKO shall assess the changes and decide whether a new on-site CB audit is required. ETKO shall record the changes and, if necessary, update the GLOBALG.A.P IT systems and reissue the GLOBALG.A.P Supply Chain certificate.

4.3.1.5 Remote CB Audit

A remote BK audit is conducted via video conference and follows the same basic structure as a regular BK audit (i.e. opening meeting, interview and closing meeting).

The ETKO auditor confirms the identity of the auditee. Remote BK audits via email exchanges are not permitted. Two-way verbal communication is established between the ETKO auditor and the auditee.

A qualified ETKO auditor conducts a remote BK audit using the same checklist as for on-site BK audits and submits an audit plan prior to the audit.

A remote BK audit can be divided into several sessions. At the end of the session, the auditor sends a report summarizing all findings to the auditee for written approval and confirmation, and documents receipt of the report.

General confidentiality rules apply to all information/evidence used in a BK audit.

4.3.1.6 Subcontractors

A subcontractor is defined as a person or firm that performs an activity on behalf of another person or firm and that person or firm continues to be responsible for the product. The firm may outsource the activities within the scope of its certificate to subcontractors with and/or without Supply Chain certification.

The activities subject to outsourcing contracts are those activities within the scope of the firm's GLOBALG.A.P Supply

Chain certification, such as purchasing, processing, packaging, warehousing, labeling and invoicing of products.

4.3.1.6.1 Subcontractors with a valid GLOBALG.A.P. certificate for CoC, PHA or IFA

If a subcontractor of a GLOBALG.A.P certificate holder for CoC also holds its own GLOBALG.A.P certificate for CoC, PHA or IFA for the same product included in the activity for which it is undertaking, the main firm shall ensure that the GLOBALG.A.P certificate for CoC, PHA or IFA of the subcontractor is valid and covers all relevant scope and activities.
In this case, ETKO is not required to inspect each subcontractor site and shall accept the existing CoC, PHA or IFA certificate of the subcontractor and verify its scope and validity.

4.3.1.6.2 Subcontractors who do not hold a valid GLOBALG.A.P. certificate for CoC, PHA or IFA

Subcontractors are included in the certificate holder's GLOBALG.A.P Supply Chain certificate.
The Supply Chain certificate holder is responsible for monitoring the control points applicable to the subcontractor activities covered in the Supply Chain standard, checking and signing off the subcontractor's assessment for each task and contracted process/activity.
As part of the self-assessment, the Supply Chain certificate holder assesses its subcontractors and maintains records/evidence of compliance with the applicable control points. This evidence is kept on site during CB audits. Subcontractor assessments may be conducted through an internal on-site or off-site assessment, depending on the risk defined in the section below.
Subcontractor(s) shall agree that verification of assessments through on-site audits by their approved CBs within the scope of Supply Chain is permitted.

4.3.1.6.3 Subcontractor CB audit – CB Rules for subcontractors

Subcontractors are audited by ETKO for the risk of incorrect identification, substitution or dilution of certified products by non-certified products.

(i) Subcontractors involved in (re)processing, (re)packaging and/or (re)labelling of certified products, storage and handling of bulk products (unpackaged, unsealed or unlabelled) or storage and handling of directly packaged but unlabelled products are classified as high risk (processing or packaging activity, labelling, a warehouse where unpackaged or unlabelled products are stored, etc.).

(ii) Subcontractors involved in storage and handling of packaged, sealed and labelled products where the risk of product mix-ups or change of identity is minimised are classified as low risk (cross-docking activities, loading and unloading of packaged and labelled products, a warehouse where only packaged and labelled products are stored, etc.).

If subcontractors have not undergone a CB audit under their own GLOBALG.A.P certification for CoC, PHA or IFA, ETKO will conduct risk-based sampling audits (on-site CB audits) of subcontractors. Subcontractors with high-risk processes related to the Supply Chain scope ((re)packaging, (re)labelling, (re)processing, etc.) will undergo any type of CB Audit every year. The contractor's CB providing Supply Chain certification may arrange for a CB in the subcontractor's country/region and a local auditor to conduct the CB audit of the subcontractor. Note: This does not apply to units, locations or sites that are owned by a Supply Chain certified company (i.e. sites that are part of the same legal entity as the Supply Chain certified company). These units are audited by the CB and do not receive their own Supply Chain certification.

Subcontractors with low risk processes (related to the Supply Chain scope) do not need to be audited by the CB every year. The certified company maintains a continuously updated list of subcontractors classified as low risk and immediately reports any changes to this list to ETKO. ETKO checks the list of approved subcontractors during the annual CB audit and if there are any doubts, ETKO may decide to verify the subcontractor through on-site CB audits. The

GLOBALG.A.P Integrity Program and ETKO reserve the right to randomly audit and inspect these units.

4.3.1.6.4 Subcontracted Transportation

Subcontractors who transport products that are legally owned by the certificate holder are registered under the certificate holder's subcontracting parties, together with evidence that no changes have been made at the product and packaging level. Transportation subcontractors are not required to implement Supply Chain requirements. A statement from the transportation subcontractor(s) that the product being transported has never been altered is maintained with the relevant subcontractor records.

Note: Storage areas may be included in the transportation exemption if they provide stopping points as part of transportation or logistics activities. However, if an organization contracts with a service provider to store products that have not yet been sold to a customer, this is considered an extension of the organization's storage area and therefore subject to subcontractor risk classification.

5. Laboratory Analysis

During the control, the controller may take samples to be sent to a laboratory accredited according to the ISO 17025 standard for analysis in cases where he suspects that production techniques or inputs that do not comply with the provisions of the regulation are used.

6. Review of the Audit File

After the field control, a control report is prepared. If additional information and documents regarding the control obtained from the entrepreneur/producer/producer organization have been made separately, the audit file is prepared together with the analysis results and delivered to the certifier for review.

The audit file is reviewed by the certifier.

Certificate:

-Retrieves the control file from the controller

-Checks the content of the file and detects any deficiencies and requests them from the relevant controller

-Fills out the Certification Decision Form, and a certification decision is taken after completing the deficiencies specified here.

7. Corrective Actions

The maximum time allowed to take and verify corrective actions for major and minor nonconformities is 28 days and this must be verified by ETKO.

In GLOBALGAP, if corrective actions are not delivered to ETKO within 28 days from the audit date for new applications, an "open non-conformity" situation is determined in the database and if the cause of the open non-conformity is not resolved within three (3) months, a full audit is carried out before the document is issued. If the corrective actions are not delivered to ETKO within 28 days as of the audit date of the certified entrepreneur/producer/producer organization, the certificate is suspended, and if the cause of the non-conformity is not resolved within 12 months as of the suspension date, the certificate is cancelled.

Nonconformity detected in GLOBALGAP; This period can be shortened if it is critical for worker, environmental and consumer safety. Where a serious threat to food safety, employee safety, the environment, consumers and/or product integrity exists (e.g. the sale of non-certified products as certified), certification will be suspended immediately and this will be communicated with a formal warning letter.

In cases where corrective action plans are approved by ETKO, their implementation is verified at the next control visit.

In case of renewal of certification, costs will be charged based on the control fees valid at that time.

8. Certification Decision

The responsibility for and authority over decisions regarding certification belong to ETKO and cannot be transferred to any institution or organization. 7.6.1

The certificate is not transferable from one legal entity to another. If a company changes its legal entity (i.e. merges, is acquired, franchised, split or otherwise reorganizes), a new CB audit is required. The term “certification cycle” is defined as the period during which the certificate is valid and the certificate is to be renewed. The default certification cycle is 12 months, subject to any sanctions and extensions in accordance with the scope described.
a) In the case of an Option 1 multi-site company, all production sites where the products registered for certification are processed are audited by ETKO before the certificate is issued. In this case, even if ETKO uses a checklist per site, the result is combined into a single checklist covering all registered sites and summarizing the result for the entire legal entity.
b) Upon completion of the full CB audit process, a full written report is prepared summarizing the audit activity performed, providing objective evidence and information on how the company complies with the requirements of the standard and, where applicable, listing any non-conformances and/or non-compliances identified.
c) The representative of the audited company signs or approves the ETKO audit result during the closing meeting (including at least the date and duration of the audit (start and end time), the name of the ETKO auditor, the scope of the audit, the sites visited, the list of results and findings as a % of compliance for the different control point levels). A documented or electronic approval by the company is considered equivalent to the signature of the audited person. In the case of a digital signature, it must be a genuine and valid signature (i.e. JPG images are not considered valid signatures). d) Compliance is indicated with "Yes" (for compliant), "No" (for not compliant) and "Not applicable" (for not applicable). Control points and compliance criteria indicated as "No 'Not applicable'" are not answered as "not applicable". In the exceptions where the control points are not applicable, the answer is given as "Yes" with a clear justification. e) Comments are recorded to ensure that the audit trail is reviewed after the fact, in accordance with the audit methodology manual. Comments include details of the evidence checked during the ETKO audit. If there is no published audit methodology manual for a specific scope or standard, comments are necessarily provided for all compliant, non-compliant and non-applicable Major Must control points and all non-compliant and non-applicable Minor Must control points. This applies to CB audits and self-assessments. In the case of self-assessments, comments shall be provided for at least all non-compliant and non-applicable Major Musts and Minor Musts. Comments and evidence, such as which document(s) were sampled, which workers were interviewed, etc., shall be site and product specific and shall be included in the checklist to ensure that all control points are properly inspected for all applicable sites and products. f) The ETKO audit report includes:
(i) All data fields marked as required in the GLOBALG.A.P IT systems (Audit Online Hub checklist) when available for the Supply Chain
(ii) Scope of the CB audit according to the GLOBALG.A.P registration data requirements
(iii) Calculation of the total applicable Major Must, Minor Must and Recommendation control points and the percentage of compliance achieved for each level
(iv) List of non-compliances, non-conformances and follow-up actions agreed with the company (includes relevant control points, details of findings based on objective evidence, deadline for corrective action, description of the corrective action agreed with the manufacturer, a reference to objective evidence of implementation of the corrective action, assessment results of the corrective action (open/closed) and relevant dates of these actions)
(v) Conclusion on whether the company is compliant
(vi) Name of the reviewer(s) (also in ETKO procedures or ETKO certification management software)
(vii) Stage of the ETKO audit report, i.e. preliminary or final (ETKO may further define different audit report stages)
g) The ETKO audit report forms the basis on which a decision can be made to grant a certificate.

h) The person making the certification decision or at least one member of the CB decision-making committee shall meet the CB auditor qualifications.
i) The date of the certification decision may be recorded elsewhere/in ETKO's system, although not in the audit report, but must be recorded in the GLOBALG.A.P IT systems.
j) Copies of the audit report, objective evidence of the implementation of corrective actions and/or a fully completed audit checklist shall be provided to the regulatory authorities upon request, in accordance with applicable national legislation. They shall also be provided to the GLOBALG.A.P Secretariat by default and to the accreditation body upon request. No additional version shall be provided unless the company grants access by written authorization.
k) Externally distributed ETKO reports (audit report, corrective action report, etc.) and completed audit checklists are write-protected or otherwise controlled to prevent unauthorized modification or tampering prior to distribution.
l) The fully completed audit checklist includes all applicable checkpoints, requested comments, findings and objective evidence of implementation of corrections and/or corrective action. ETKO shall provide the final audit report including the completed audit checklist to the company no later than the time the certification decision is made when the target country (as recorded in GLOBALG.A.P IT systems) includes the United States and/or Canada. In addition, if any manufacturer requests it, ETKO shall provide the full audit report including the completed audit checklist within five business days of its completion. ETKO is not required to submit a report prior to undergoing internal technical review. If the automatically generated audit report (including the checklist) is available from GLOBALG.A.P IT systems, this report shall be used.
m) Once made available to the Supply Chain, the audit report and the completed audit checklist shall be uploaded/transferred to GLOBALG.A.P IT systems.
n) ETKO has processes in place to handle situations where translations of reports are requested.
o) The paper certificate issued by ETKO is prepared in accordance with the GLOBALG.A.P certificate template for the Supply Chain (Annex I.3). The format may differ, but at least it contains the same information.
p) The paper certificate matches the information in the GLOBALG.A.P IT systems only for the unique certified company in question.
q) The paper certificate issued by ETKO is prepared in English. Additional language(s) may be added.
r) "Certificate date": The date on which ETKO makes the certification decision after all non-compliances have been closed (e.g. February 14, 2023)
s) "Validity date":
(i) For initial CB audits: The initial validity date is the date on which ETKO issued its final certification decision (e.g. 14 February 2023). (ii) For subsequent CB audits: The "validity start" date for subsequent issued certificates shall be one year from the "validity start" date of the original certificate (14 February 2023, 14 February 2024, etc.), unless the certification decision was issued after the expiration of the previous certificate. In this case, the "validity start" date coincides with the date of the new certification decision.
However, the "validity end" date remains the old expiration date with the year adjusted (e.g. "validity end" date of the previous certificate: 13 February 2023; date of the new certification decision: 25 February 2023; new "validity start" date: 25 February 2023; new "validity end" date: 13 February 2024).
t) "Validity to":
(i) For initial CB audits: calculated as the "validity to" date plus one year minus one day. ETKO may shorten the certification cycle and validity period, but not extend it.
(ii) For subsequent CB audits: The validity date of subsequent issued certificates is always calculated from the "validity date" on the original certificate (February 13, 2023, February 13, 2024, etc.).
u) Where possible, ETKO uses the audit report template published by GLOBALG.A.P IT systems.

The certification process is carried out annually.

The certification decision is made by the QMS Auditor who is appointed by ETKO, has signed a mutual contract and is

employed by ETKO (not involved in the audit process of the relevant file) and is authorized for the relevant GLOBALGAP scope (IFA, CoC).7.6.3

ETKO is not an organization affiliated with any organization, it is a single-partner limited company and acts independently.7.6.4

All ETKO personnel work directly affiliated to ETKO under contract and are not involved in any organization other than ETKO.7.6.5

Following the field audit, all information and documents obtained from the company/producer/producer group and related to the audit, if any, are prepared together with the analysis results and submitted to the GLOBALGAP QMS Auditor who will perform the certification. The review and certification decision process is completed by the said auditor. The auditor is not involved in the audit process of the file in which he/she is involved in the review and certification decision process. 7.6.2

For IFA Scope;
ETKO shall make its decision on certification within twenty-eight days at the latest after the completion of corrective actions for all Major non-conformities (100%) and 95% of Minor non-conformities and if the producer complies with the current GLOBALGAP General Regulation articles including the GLOBALGAP Sublicense Agreement and the ETKO Producer-Producer Group/Multi-site producer Agreement articles and if the Option 1 Multi-Site Producer with QMS and Group Producers fully comply with the QMS Requirements (this situation includes the completion of corrective actions regarding the non-conformities determined at each member/site level for the Option 1 Multi-Site Producers/Producer Group with QMS). (GG_GR_Rules_for_IP_v6_0-7.1.1)

For the scope of Supply Chain certification;
After the completion of corrective actions for all major non-conformances (100%) and in case the producer/company complies with the current GLOBALGAP General Regulation articles including the GLOBALGAP Sublicense Agreement and ETKO GLOBALG.A.P. Producer-Producer Group Agreement articles, it shall make its decision regarding certification within twenty-eight days at the latest.
Note: The current Supply Chain Control Points and Compliance Criteria have only two Minor Must control points (applicable to aquaculture). In order to be certified, the company must pass at least one Minor Must control point (provided that all Major Musts are complied with).
In a multi-site operation, the level of compliance is calculated in a single checklist for the entire operation. Valid control points common to all sites (for example, a packaging facility) are taken into account for all facilities.

If there are recommendations, no minimum compliance percentage is required for the certification decision to be taken.

If no non-conformity or non-conformity is detected during the audit, this means that ETKO must make a decision within 28 days at the latest after the audit. In other words, if no non-conformity and/or non-conformity is detected during the audit, the certification decision is made within 28 days at the latest after the audit. The certification decision is recorded, including the date the certification decision was made. In addition, the certification decision date is recorded in the GLOBALG.A.P. Database system. The “GP 05 Procedure for Objections, Complaints and Disputes” explaining how to submit any complaint or objection to ETKO can be accessed from the ETKO web page and the “GP 05 F 03 Dispute & Objection and Complaint Application Form” can also be accessed from the ETKO web page in order to submit the complaint in writing to ETKO. In addition, unresolved complaints can be submitted to GLOBALG.A.P. can be forwarded to the GLOBALG.A.P. Secretariat using the 'GLOBALG.A.P. Incident/Complaint Form' available on the website (www.globalgap.org).

The validity period of the certificate is 12 months from the date of issue, unless there is a sanction or extension.

ETKO notifies the producer/producer group in writing of its decision not to grant certification to any company/producer/producer group, together with the reasons. If the company/producer/producer group declares its request to continue the certification process, ETKO restarts the audit process as described in this procedure. 7.6.6

The Impartiality Committee is authorized to monitor the certification process and ensure that the certification activities continue to comply with the "TS EN ISO/IEC 17065: December 2012 Standard" and ETKO QMS requirements.

Once certification under IFA has been achieved, the producer group may issue a declaration for its producer group members to demonstrate that they are indeed producer group members. Producer group members must be listed in the certificate annex in order to receive this declaration. The declaration does not replace the certificate and should not be used in trade or to claim certification. For the minimum requirements applicable to issuing this declaration, see Annex I of the "GLOBALG.A.P General Regulations – Rules for Producer Groups and Multi-Site Producers with QMS". (230620_GG_GR_Rules_for_QMS_v6_0_Sep22_4.1.2)

8.1 GLOBALGAP Certificate Validity Extension GG_GR_Rules_for_CBs 8.4

The validity period of the certificate can only be extended for a maximum of 4 months beyond the usual 12 months if there is a valid reason. There is no extension of validity for certificates whose validity period has expired.
Before the extension is granted, ETKO will have a signed, complete application form and a signed certification agreement for subsequent certification.
Note: If ETKO or the manufacturer wishes to extend the validity of a certificate, ETKO obtains confirmation from the manufacturer of the request for extension and a clear written statement that this action cannot be changed in the BK during this certification process.
After the extension begins, the entire GLOBALG.A.P system participation fee for the next certificate will be paid to ETKO by the producer.
In case of certificate extension, the full GLOBALG.A.P system participation fee will be paid for the next certificate. During the extension period, the producer/ producer groups/ multisite producers is inspected again. The producer / producer groups/ multisite producers cannot switch to another certification body during the certification process following the certificate for which the extension is granted.

a) The default certification cycle of 12 months may be extended by a maximum of 4 months only under the following conditions:
(i) The product is re-accepted for a full next cycle in GLOBALG.A.P IT systems within the original validity period of the certificate.
(ii) The full registration fee for the next cycle is paid.
(iii) The certified company is re-audited by ETKO within this extension period.
b) If a certificate expires without an extension or re-acceptance and the next CB audit (to be conducted by the same CB) occurs less than 12 months after the expiration date, a valid reason for the expiration of the certificate is given and a new certification cycle begins. ETKO may restart the old certification cycle by specifying the same "validity date" referring to the old certification cycle. If the certificate has been extended and a product was re-accepted during the old certification cycle, the cycle is not changed.
c) If the certificate has expired by more than 12 months, ETKO applies the rules for the first (first) CB audit.

9. Logo ve Sertifika Kullanımı

ETKO Logo can be used on certified products, the use of the GLOBALGAP logo is subject to the rules specified in the general regulation section I ANNEX I.1.

A guidance document defining the rules to be followed in the use of the certificate and logo is published on the ETKO website. The entrepreneur/producer/producer organization will send their logo samples to ETKO for approval before use. Additionally, ETKO will control how the logo is used at its own discretion and during surveillance visits.
In case of incorrect use of the logo, non-conformity is brought to the agenda and the entrepreneur/manufacturer/producer organization is requested to take corrective actions. Such non-compliance may result in suspension or withdrawal of certification.

10. Maintaining Certification Approval

ETKO carries out periodic follow-up inspections to see and verify that the products within the scope of certification continue to comply with the relevant regulations, mandatory and legal requirements. In these subsequent audits, corrective action plans and implemented actions are carried out, if possible, by the ETKO auditor who performed the previous audit, and if not possible, by another ETKO auditor who is qualified for the scope of the relevant audit. (GG_GR_Rules_for_CBs_v6-8.2.d)
Following the surveillance process; The review and certification decision processes are carried out in accordance with the relevant conditions specified in this procedure. 7.9.2

Additionally, if the ETKO Logo is used on products, periodic subsequent inspections are carried out to ensure compliance with the regulations. 7.9.3

Regarding the maintenance of certification of the products included in the certificate, the information in the application form, including the products recommended and all information requested for the relevant scope in the GLOBALGAP registration data requirements, is confirmed with the manufacturer / producer group / multi-site producer every year before the expiry date of the certificate(GG_GR_Rules_for_IP_v6_0-7.4.a) and the records of the relevant products are updated in the GLOBALGAP Database.
And for products for which confirmation has been received regarding maintenance of certification, the auditor completes all relevant checklists and verification processes annually.

a) New sites and members may be added to a valid certificate (provided internal approval procedures are met). It is the responsibility of the certificate holder to immediately update ETKO on any addition or withdrawal of members/sites to/from the list of approved members/sites.

b) Up to 10% of new members/sites in one year can be added to the approved list by registering the members or sites without necessarily resorting to further verification by ETKO.

c) If the number of approved members/sites increases by more than 10% in one year, further ETKO farm audits of the newly added members/sites and an audit of at least the relevant part of the QMS will be required before additional members/sites can be added to the certificate. The relevant part of the QMS is the internal approval procedure: internal farm audit, review of the internal farm audit report, inclusion of the new member/site in the QMS internal register with status “approved.”

d) Regardless of the percentage by which the number of approved members/sites increases in one year, should the newly registered farms increase the production area or quantity produced (in the case of aquaculture) of previously registered products by more than 10% in one year, or a change in members/sites exceeds 10%, further ETKO audits of the newly added members/sites and a ETKO audit of at least the relevant part of the QMS is required before additional members/sites can be added to the certificate.

e) In c) and d) the minimum sample of members/sites to be audited by a ETKO is the square root of the number of new members/sites.

f) Regardless of the number of members/sites and the increase in quantity, if a new product is to be added to the certificate between surveillance CB audits and certification audits, a ETKO audit shall be carried out to the square root of the members/sites growing the new product. (230620_GG_GR_Rules_for_QMS_v6_0_Sep22-4.9)

11. GRASP GRASP_general_rules

11.1 GRASP Application Options

GRASP only applies to producers with a valid certificate according to the Integrated Farm Assurance for fruit and vegetables.

Additionally, for any GRASP application, evidence is provided that the criteria for the health, safety and welfare of employees have been verified.

In order to receive a letter of compliance, a full compliance result must be obtained in this category.

GRASP does not apply if the producer does not employ any type of workers during the certification cycle or during the year before the assessment. But:

- GRASP is valid for family farms with no workers hired during the certification cycle or during the year before the assessment. A letter of compliance is issued if the family farm achieves the required level of compliance and evidence of full compliance with the health, safety and welfare of employees criteria.
    - Family farms are evaluated for the availability of hired labor and selected Principles and Criteria from the GRASP checklist.
- Facilities of multi-site producers (Option 1) and producer group members (Option 2) that do not employ workers are considered in internal and external GRASP QMS audits and are visited by the auditor to assess the shortage of hired labor. These manufacturers will also provide evidence of full compliance with workers' health, safety and welfare criteria.

11.1.1 GRASP for product handling units

It is not possible to evaluate only the product processing units or the producer group's own production areas. GRASP applies to product processing units only if the product processing is covered by GLOBALG.A.P.

In such a case, Product Processing Units and/or the producer group's own production facilities/sites are included in the GRASP assessment as another member/facility and are evaluated in addition to the producer group members/production sites. Product Processing Units will also provide evidence of full compliance with workers' welfare criteria.

11.1.2 GRASP Application to labor subcontractors, other subcontractors and visitors

GRASP applies to all subcontractors who provide farm labor (including farm labor and equipment, farm labor and material, or some combination of farm labor, material, and equipment) for primary farm activities of agricultural production at produce processing units or production sites. These workers/agricultural workers are included in the GRASP assessment. The term “primary farm activities” refers to activities directly related to the production of the product (for example, including pruning of fruit trees but excluding farm barn construction).

The producer will inform ETKO about subcontracted labor activities during registration. The producer shall ensure that the labor subcontractor or employment agency complies with GRASP requirements.

Other subcontractors may not be included in the GRASP evaluation unless the auditor identifies a risk of GRASP integrity issues.

For outsourced activities that require the presence of visitors or subcontracted personnel on the farm, ETKO checks whether the producer declares a zero tolerance policy for non-compliance with human rights and local laws (GRASP human rights policy) during the presence of subcontracted personnel on the farm.

11.2 GRASP Requirements of Individual Producers and Producer Groups

Any GRASP applicant shall comply with GLOBALG.A.P general regulations regarding individual/producer group requirements.

11.3 GRASP Registration Process

The GRASP registration process will comply with the GLOBALG.A.P general regulations and additional rules. Moreover; It will be ensured that the product to be registered for certification by ETKO is not registered under another certification body;

- Ensure that the same product is not registered under more than one Option (as an individual producer and producer group member)
- Ensure that production facilities in different countries are not registered (unless an exception is granted by the GLOBALG.A.P Secretariat for the relevant case)

The applicant will register for GRASP on the same CB as the primary production standard.

GRASP only applies to producers with a valid certificate according to Integrated Farm Assurance for fruit and vegetables. If the applicant is registered with ETKO for Integrated Farm Assurance certification for fruits and vegetables, he/she will also be registered for GRASP certification.

The applicant shall provide information by gender on the number of workers in the year prior to registration and the type of workers (permanent, seasonal, etc.) recruited in the previous evaluation period.

The applicant shall state whether the subcontracted worker has been employed and, if so, the number of workers employed in this condition in the year preceding registration.

The applicant shall indicate whether the farm is operated as a family farm (operated as a nuclear family business) and indicate the number of family members working and the family relationships of the group.

A multi-site producer/producer group applicant with a QMS shall indicate the total number of producer group members/production facilities and how many of them are with and without workers.

11.4 GRASP Audit Process

In addition to the latest GLOBALG.A.P general regulations and GLOBALG.A.P general plug-in rules, the GRASP-specific rules and instructions set out in this section provided in the applicable supporting documentation for GRASP apply.

11.4.1 GRASP Self-assessments/Internal Farm Audits

For all producers, GRASP self-assessment or internal farm audit, respectively covering product processing units, is mandatory as specified in the GLOBALG.A.P general regulations. In both cases, verification of full compliance with the criteria for the health, safety and welfare of employees will be noted in the report.

Each self-assessment or internal farm audit will be carried out as specified in the GLOBALG.A.P general regulations.

To ensure appropriate auditing of all Principles and Criteria for all applicable sites/producers, self-assessment/internal farm auditing is carried out where the number of workers available is representative of the workforce hired during the year/production cycle (particularly subcontracted and seasonal labour) and where agricultural activities take place (e.g. It will be carried out during a period (peak period or harvest period).

Country risk level will be checked and adhered to to determine the necessary evidence methods to be used in internal farm auditing. Interviews will be conducted (where necessary) and cross-checked through document review. Information on this subject will be included in the summary reports. This rule does not apply to self-assessments under Option 1 and Option 1 multi-site generator without QMS.

For each Principle and Criteria assessed in all GRASP self-assessments/internal farm audits, clarifications and comments on all non-compliant Major Musts and Minor Musts will be provided. Summary reports will provide objective evidence (e.g., worker interviews where appropriate) and information regarding how the manufacturer complies with GRASP requirements and list any non-compliances and/or nonconformances identified. Which document(s) were sampled, which workers were interviewed, etc. Comments and evidence such as these will be site and product specific and will be included in the checklist.

11.4.2 ETKO GRASP Audit

ETKO GRASP Audit is carried out by personnel who meet the requirements defined in the GLOBALG.A.P general regulations and this document and are authorized by ETKO as GRASP Assessors.

The GRASP assessment is carried out in conjunction with the Integrated Farm Assurance audit and QMS audit for fruit and vegetables.

GRASP assessment is carried out by ETKO only for producers whose Integrated Farm Assurance audit and QMS audit for fruits and vegetables are carried out by ETKO.

GRASP compliance letter is issued only after the manufacturer provides the necessary information and documents regarding the findings as a result of the GRASP evaluation, showing full compliance with all Principles and Criteria regarding the health, safety and welfare of workers, and after their verification by ETKO.

ETKO GRASP Assessor uses the GRASP checklist for Option 1, Option 2 and family farms, available in GLOBALG.A.P IT systems.

ETKO GRASP Assessor checks the country risk level and determines the necessary evidence methods before making the assessment. Additionally, the ETKO GRASP Assessor checks and records the number of workers (by employment, immigration status and gender) present on the farm visited on the day of the assessment. The ETKO GRASP Assessor applies the correct sample size for document review and, where appropriate, the sample size for interviews.

Due to the social nature of GRASP, explanations and comments are provided in all cases (Yes/No) for each Principle and Criteria evaluated in all ETKO audits. Clarifications and comments (e.g. which document is/is sampled) are added to the checklist to be site specific and demonstrate that all Principles and Criteria have been appropriately assessed.

A full written summary of the evaluation activity performed is provided by ETKO. This provides objective evidence and information on how the manufacturer complies with GRASP requirements and, where applicable, lists any non-compliances and/or non-conformities identified. Comments and evidence, such as which document(s) were sampled, which workers were interviewed, are site and product specific and are included in the checklist to ensure that all Principles and Criteria are appropriately audited for all applicable production facilities, product processing units and products.

"Company description" in Audit Online Hub provides information about the company, its organizational structure; location of production facilities, product processing units and office (main office/human resources); and different operating seasons or recruiting activity/surge windows, etc., where applicable. It will contain qualitative information.

Ent Farm Assurance QMS Checklist is used during ETKO GRASP QMS audit. Comments (Yes/No) regarding GRASP compliance are always included for each applicable Policy and Criteria. If any Principles & Criteria are deemed not to apply to GRASP, the full justification for the inapplicability will be stated.

The names and personal data of responsible persons or other employees are not specified in any comments on the GRASP checklist. Instead, initials/other abbreviations or internal codes/numbers determined by the worker's position or the manufacturer/company are used.

Other personal data of employees (e.g. contract, time records, paychecks) will be accessible to the ETKO GRASP Assessor and will be provided by the employer. The document prepared on the protection of personal data can be used by the employer in order to provide appropriate data and ensure transparency. If the workers need and request, the employer will communicate this to the workers.

Where the GRASP National Interpretation Guide for Turkey is available, ETKO uses it by applying the rule that provides greater protection to workers. If GRASP provides greater protection, it overrides local law, and if local law provides greater protection, it overrides the GRASP Principles and Criteria. The inclusion of a topic in the National Interpretation Guide does not enable changes to the GRASP Principles and Criteria.

11.4.2.1 ETKO Inspection of Labor Subcontractors

ETKO evaluates the subcontracted worker's compliance with the GRASP Principles and Criteria as part of the manufacturer's responsibility and liability during the GRASP evaluation of the manufacturer.

The manufacturer is responsible for providing ETKO with evidence of GRASP compliance of its labor subcontractors. ETKO reports a non-compliance for the relevant Principle and Criterion if compliance cannot be verified due to the subcontractor's lack of necessary evidence (e.g. lack of documentation or lack of access to evidence).
ETKO may visit an office/production site at the labor subcontractor's facilities if deemed necessary. Labor subcontractors, through their commercial agreement with the manufacturer, will accept that GLOBALG.A.P approved certification bodies allow a physical certification body audit within the scope of GRASP in case of doubt. It is the manufacturer's responsibility to add this clause to the agreement signed with labor subcontractors.
Any non-compliance revealed during the evaluation of subcontracted labor activities is recorded as non-conformance of the manufacturer. These non-conformities are subject to corrective actions in accordance with GLOBALG.A.P general regulations. The manufacturer will provide evidence to the ETKO GRASP Assessor that the nonconformity has been corrected. If corrections have not been made by the subcontractor, the manufacturer will have evidence that a warning was given and/or the commercial relationship was terminated after the subcontractor did not respond.
ETKO will notify you of an additional non-compliance with the criteria related to the self-assessment/internal QMS audit if the subcontractor's non-compliance is noted in the internal QMS audit or self-assessment, but no correction is requested. Any request for correction of a subcontractor's non-compliance in an internal QMS audit or self-assessment shall be made in writing, and if the requested corrections are not followed up until evidence of correction is received, the manufacturer will also be deemed non-compliant.
If the labor subcontractor has official and up-to-date social audit/compliance evidence valid for the same scope of GLOBALG.A.P certification, including the service they provided to the manufacturer, the ETKO GRASP Assessor may consider the labor subcontractor's compliance to be verified. Evidence of subcontractor audit/compliance may be provided in the form of group level verification to each producer group member included in the external evaluation or to group members who have signed a commercial contract with the producer group.
In all agency work evaluations, the assessor will include explanations in each Principle and Criteria of the checklist.

11.4.2.2 Duty to communicate with subcontractors or other visitors on the farm

Visitors and subcontractors other than labor subcontractors are not within the scope of GRASP and are not evaluated.
The manufacturer is responsible for informing visitors entering and visiting subcontractors of a GRASP-registered manufacturer's premises that non-compliance with the manufacturer's human rights policy will not be tolerated.
The producer shall provide ETKO with evidence of both of the following:

- Evidence that all visiting visitors and subcontractors have been informed by the manufacturer about the manufacturer's zero tolerance policy regarding human rights and local law violations;
- Evidence that if violations are detected on the farm, the producer requests the immediate cessation of activity at its facilities.

Lack of evidence of communication or evidence of a request for immediate cessation of activity is noted in the GRASP checklist as failure to comply with the duty to communicate the human rights policy to subcontractors.

11.4.2.3 Option 1 Evaluation of Individual Producers Without QMS

The results of self-assessments/corrections are verified during the ETKO GRASP Assessment. Internally, each production site will be evaluated.
ETKO follows the GLOBALG.A.P general regulations regarding audit processes for initial and subsequent evaluations, which are also defined in this procedure. In order to facilitate worker interviews, the timing of the evaluation is determined taking into account the availability of workers on the day of the evaluation and the availability/accessibility of the workers' representative on the day of the evaluation. Only if none of the workers are present will the evaluation be rescheduled.

	Early and Subsequent Years

Producer self-assessment	The entire scope (all registered products, production facilities and product processing units registered under the Integrated Farm Assurance for fruits and vegetables) is assessed annually
ETKO GRASP Evaluation	Initial Assessment: Informed evaluation of the entire scope (all registered products, production facilities and product processing units registered under the Integrated Farm Assurance for fruits and vegetables)
	Subsequent Evaluation: Annually announced evaluation including the entire scope (all registered products, production facilities and product processing units registered within the scope of Integrated Farm Assurance for fruits and vegetables) and 10% unannounced evaluation probability (Producer ETKO's 10% of GLOBALGAP customers may be selected within the scope of the unannounced GRAPS Evaluation.)

ETKO carries out GRASP evaluation of production sites and sampled central product processing units (square root of the total number) by following the sampling rules of GLOBALG.A.P general regulations specified in this procedure. The final GRASP report combines results and evaluation notes for all production sites and product processing units visited, showing any differences between sites.
ETKO also interviews management, cross-checks information on worker health and safety training, personal protective equipment and other topics of the primary production certification checklist, considers farm conditions, checks official self-inspections, examines producer declarations, inspects production and fruit and cross-checks with harvest yield data from the Integrated Farm Assurance audit for vegetables.

11.4.2.4 Option 1 Multi-Field Producer and Producer Group GRASP Assessment with QMS

The results of the internal QMS audit will be summarized and maintained in the GRASP internal checklist for producer groups and Option 1 multi-site producers with a QMS.
The annual ETKO assessment uses the Integrated Farm Assurance_QMS Checklist to determine how the QMS is performing against the GRASP Principles and Criteria. Evaluates and checks the applicability of QMS procedures and systems within the scope of GRASP.
When the ETKO GRAPS Assessor evaluates the level of implementation of the GRASP QMS using the Integrated Farm Assurance_QMS Checklist, he also states the overall conclusion in the QMS Principles and Criteria in the GRASP Principles and Criteria based on the internal audit results and the ETKO QMS audit. It also includes comments on the GRASP Principles and Criteria. Additionally, the ETKO GRAPS Assessor examines whether the internal QMS audit has been carried out and what the results were.
All producer group members, production facilities and units with Integrated Farm Assurance certification are registered in GRASP and are considered for sampling in the GRASP assessment. GLOBALG.A.P general regulations specified in this procedure are applied in the ETKO GRASP evaluation of the sampled producer group members, production sites and product processing units. The sample will always be the same sample selected for the Integrated Farm Assurance audit.
Instead of evaluating all producers of a producer group within the scope of GRASP, ETKO performs a GRASP Assessment for the square root of the number of producers and the sampling rules for the Integrated Farm Assurance and GRASP scopes specified in this procedure are applied. It is not ETKO's responsibility to determine the suitability of each manufacturer (this responsibility lies with the applicant). ETKO evaluates whether the applicant's internal controls are appropriate and this is done during the ETKO QMS audit.
In initial, surveillance and subsequent evaluations, ETKO applies the GLOBALG.A.P general regulations regarding audit processes, which are stated in the table below.
In order to facilitate worker interviews, when determining the time for the assessment (and the distribution between surveillance and recertification visits), the presence of workers on the day of the assessment and the presence/accessibility of worker representation at the production site of the producer group members are taken into

account. If the resulting sample includes workers at the production site or members of the producer group without workers' representation, the following applies:

- ETKO GRASP Assessor verifies the reasons for the absence of workers and workers' representatives.
- When producer group members cannot be evaluated according to GRASP, the ETKO GRASP Assessor includes notes in the report confirming the reasons for workers' absence and devotes this visit to document review (if low-risk country sampling rules apply).
- The ETKO GRASP Assessor verifies whether the Principles and Criteria regarding the health, safety and welfare of workers are fully complied with, whether workers are present at the time of the inspection and how many people are missing from the existing workforce. Notes and explanations regarding this verification are included in the report.
- In the next closest evaluation or surveillance/subsequent evaluation, ETKO includes the producer group members who do not have workers and requests them to have workers.

	Initial Evaluation	Subsequent Evaluation
Internal Evaluation of Multi-Domain Producer/Producer Group with QMS		
Internal QMS Audit	Fully comprehensive QMS Audit	Fully comprehensive QMS Audit
Internal Farm Audit	Full coverage (all registered producer group members/production sites and product processing units registered under Integrated Farm Assurance)	Full coverage (all registered producer group members/production sites and product processing units registered under Integrated Farm Assurance)
ETKO Audit		
ETKO QMS Audit	Certification Audit:	
	Initial Certification Audit: (Full QMS Audit + Square Root Audit of the total registered Central Product Processing Units whose production process had started before the ETKO Farm Audit)	Recertification Audit: (Full QMS Audit + annual audit of the Square Root of the total registered Central Product Processing Units whose production process was started before the ETKO Farm Audit)
Unannounced ETKO QMS Audit	-	Recertification Audit: QMS audit is carried out unannounced to at least 10% of all multi-field producers/producer groups with QMS
ETKO Farm Inspection	Initial Certification Audit: Farm inspection is carried out on at least the square root of the total registered members/production areas.	Recertification Audit: a) If there are non-conformities detected during the previous audit: the square root of the minimum number of registered existing members/production sites, b) If no non-conformities were detected during the previous inspection: the square root of the current registered members/sites minus the number of members/sites inspected in the previous surveillance inspection.

	ETKO surveillance audit during certificate validity: At least 50% of the square root of existing certified producer group members/production sites	ETKO surveillance audit during certificate validity: At least 50% of the square root of existing certified producer group members/production sites

Only the producer group's own production location is not evaluated. The producer group's own production facility is counted as an additional producer group member in the Option 2 producer group member evaluation sampling.
If they are part of a producer group, producers/production facilities without workers and family farms without hired workers will also be included in the group's internal GRASP QMS audit to ensure that GRASP QMS procedures are implemented.
If during the certification cycle the worker is hired by producers/production facilities that form part of a producer/producer group and do not normally recruit workers, a new internal GRASP QMS audit and farm audit will be carried out. This GRASP QMS audit will include verification of full compliance with the Principles and Criteria regarding the health, safety and welfare of workers. This will be done for the duration of the workers' presence.
In case of recruitment of workers by producers/production facilities that form part of a producer/producer group that does not normally recruit workers, the QMS manager will direct these producer group members/production facilities to ETKO. These producer group members/production facilities are then included in the next closest ETKO GRASP assessment.

- If this is not possible or workers cannot be present at the nearest ETKO Inspection, ETKO carries out a GRASP assessment at that production site after the notification of the QMS manager of the producer group.
- If a non-compliance identified in the GRASP assessment cannot be corrected, ETKO immediately escalates the matter to the GLOBALG.A.P Secretariat to amend the group's assessment evidence.

Producer group members/production facilities with no workers form part of the sampling for ETKO Audit during GRASP assessments with QMS. The composition of the sample reflects the percentage of family farms and producer group members in the producer group that do not have workers. In other words, a physical ETKO RASP assessment is applied to producer group members/production facilities where there are no workers.
Producer group members/production facilities that do not employ workers included in the sample are subjected to the ETKO GRASP Assessment to verify both the shortage of hired labor during the year/production cycle preceding the assessment and their full compliance with the Principles and Criteria on worker health and safety. Among other steps, ETKO holds discussions with management; Cross-checks information on worker health and safety training, personal protective equipment and other welfare aspects of the primary production certification checklist; considers the conditions of the farm; checks the manufacturer's official self-employment declarations; and examines production, cross-checking documentation with harvest yield data from Integrated Farm Assurance audits.
Family farms included in the sample are evaluated taking into account the above conditions (lack of hired labor) and the Principles and Criteria selected from the GRASP checklist. A level of compliance and interpretation (any yes/no) to the relevant Principles and Criteria are indicated and are not marked as "not applicable".
If a producer/producer group requests to add new producer group members/production sites, GLOBALG.A.P general regulations regarding the registration of additional producer group members/production sites in the certificate shall apply, including the following, for 12 months after the validity of the assessment:

- New producer group members/production facilities must demonstrate full compliance with the Principles and Criteria on the health, safety and welfare of workers before being added.
- The producer group will conduct an internal GRASP audit for each new producer group member.
- ETKO obtains internal evaluations of these new producer group members before adding them to the GRASP compliance letter.

If a producer/producer group requests to add new producer group members/production sites within 12 months of the assessment validity, GLOBALG.A.P general regulations regarding the registration of additional producer group members/production sites in the certificate apply, including:
If the new producer group members/production facilities added increase the total number of approved producer group members/production facilities by 10% of the producer group members/production facilities that have already been GRASP assessed, the following applies:
• The producer group will internally verify evidence of full compliance with the Integrated Farm Assurance Principles and Criteria regarding the health, safety and welfare of workers.
• The producer group will conduct an internal GRASP audit of these new producer group members before approving them.
• ETKO obtains evaluation of these members and internal GRASP QMS, including evidence of full compliance with the Integrated Farm Assurance Principles and Criteria regarding the health, safety and welfare of workers.

If the new producer group members/production facilities added increase the total number of approved producer group members/production facilities by more than 10% or the production area increases by more than 10% due to the new members/facility; ETKO requires evidence that new members fully comply with the Integrated Farm Assurance Principles and Criteria regarding the health, safety and welfare of workers and applies the GLOBALG.A.P general regulations for this situation.
If the ETKO (external) evaluation of a sampling of producer group members/production facilities or product processing units reveals major differences between the internal and external evaluation results, this difference is noted in the "Comments/Comments" field of the GRASP checklist for each relevant Principle and Criterion. . The same applies to the internal QMS evaluation and any corrective actions taken before the ETKO evaluation. Large differences may indicate a serious error in the internal evaluation results, in which case the ETKO GRASP evaluator applies the GLOBALG.A.P general regulations.
All non-compliances, wherever located (on site, in the product processing unit or subcontractor), are recorded in the "Remarks" field of the GRASP checklist, with reference to the production site, product processing unit or labor subcontractor, and corrective action is requested.
The final GRASP evaluation report includes all findings and final conclusions for the entire producer/producer group/multi-site producer and is presented at the closing meeting. The GRASP assessment report contains the same information as described in the GLOBALG.A.P general regulations. Whenever possible, ETKO uses the evaluation report template published by GLOBALG.A.P Information Technology systems.

11.4.3 ETKO GRASP Evaluation Procedure for Subcontracted Product Processing Units or other outsourcing services
In addition to the current GLOBALG.A.P general regulations and GLOBALG.A.P general add-on rules, the following GRASP-specific rules will apply:
If another certification body has carried out a GRASP assessment for an organization that provides a product processing unit/other outsourcing service subcontracted within the scope of GRASP in a production cycle, ETKO shall review the GRASP assessment that this certification body has completed for the product processing unit/other outsourcing service. accepts the result.
ETKO may accept a non-GLOBALG.A.P audit/social compliance certificate for a subcontracted product processing unit/other outsourced service provider if all of the following apply:
1. The subcontracted product processing unit/other outsourcing organization has a valid social audit evidence/social compliance certificate.
2. The scope of the subcontracted product processing unit audit/certification is the same as GLOBALG.A.P certification and GRASP.

3. Audit/certification includes the organization providing the subcontracted product processing unit/outsourcing activity service provided to the producer applying for GRASP.

11.5 GRASP Compliance System

The GRASP rules specified in this section apply in addition to the GLOBALGAP General Regulations also specified in this procedure.

11.5.1 GRASP Evaluation Results

GRASP compliance level compliance is based on a scoring system result. The GRASP checklist consists of two levels of Principles and Criteria: Major Musts and Minor Musts.

11.5.1.1 Compliance Level Requirements

- Major Musts: 100% compliance with all applicable Major Must criteria is mandatory for all evaluations.
- Minor Musts: 70% compliance with all Minor Must criteria is mandatory in the initial assessment of this GRASP version.
- Minor Musts: 75% compliance with all Minor Must criteria is mandatory in all surveillance and/or subsequent assessments of this GRASP release.

Eligibility rules for family farms with no workers:

- Major Musts: 100% compliance with all applicable Major Must criteria is mandatory for all evaluations.
- Minor Musts: Any non-compliance with Minor Must criteria is considered in the initial assessment of this version of GRASP.
- Minor Musts: 100% compliance with all Minor Must criteria is mandatory in all subsequent and/or surveillance assessments of this GRASP release.

The manufacturer shall comply with the current version of the GLOBALG.A.P general regulations regarding conformity level requirements.
So, 25 Minor Must criteria × 0.7 = 25 × 0.7 =17.5, which rounds up to at least 18 Minor Must criteria that must be met. The maximum number of Minor Must criterion non-compliances allowed is 7 (25 – 18 total). Therefore, a manufacturer must have at least 18 Minor Must criteria that are compliant and cannot have more than 7 criteria that are not compliant. If a manufacturer has 17 compliant Minor Must criteria, this gives a compliance level of 68%, which does not comply with GRASP's minimum compliance level. Note: For example, a score of 69.8% cannot be rounded to 70% (pass percentage).

11.5.2 GRASP Letter of Compliance Decision

The decision to issue the letter of conformity is made by a currently qualified GRASP assessor, other than the person conducting the GRASP assessment, and in accordance with the GLOBALG.A.P general regulations and the rules in this document.

Privacy, data use and data release

The detailed results of the GRASP assessment are shared only with GLOBALG.A.P Information Operations system users in accordance with the terms and conditions in the data access rules.
The compliance letter and results of the GRASP assessment are published in GLOBALG.A.P Information Systems systems only in the following cases:
a) Documenting the required compliance levels in the scoring system;
b) GLOBALG.A.P Integrated Farm Assurance certification is available and there is evidence of verification and full compliance with the Principles and Criteria on workers' welfare.

In case the required levels cannot be reached due to non-compliances and the non-compliances cannot be corrected in accordance with GLOBALG.A.P general regulations, the GRASP checklist containing all non-compliances and remaining open corrective actions and relevant explanations are uploaded to GLOBALG.A.P Information Operations systems.
The overall outcome will reflect clear non-compliance or suspension.
For Option 1 without QMS, which requires a declaration that GRASP does not apply, there will be a final assessment report showing that the assessor has verified unemployment during the year prior to the assessment.
The general consequence includes clear non-compliance or suspension.
For the Option 1 Multi-Domain Manufacturer without QMS, which requires a declaration that GRASP does not apply, the unemployment status during the year prior to the assessment is verified by the ETKO GRASP Assessor and evidence of this is noted in the report.

11.5.3 Unannounced recertification audit of primary production sites combined with GRASP assessment

The GRASP program does not require producers to receive unannounced surveillance inspections. However, GRASP requires following GLOBALG.A.P general regulations on audit processes for initial, surveillance and subsequent assessments and is evaluated during the primary production unannounced audit of a producer/producer group. In this case, the producer/producer group is informed of the GRASP assessment as soon as the ETKO GRASP Assessor is able to start the primary production unannounced audit.

11.5.4 Non-Compliance and Nonconformity in GRASP

ETKO applies the current GLOBALG.A.P general regulations specified in this procedure regarding producers, producer groups or multi-site producers with a QMS, and also applies the GRAPS rules contained in this procedure in relation to:
a) Addressing nonconformities detected during ETKO audit
b) Implementation of sanctions (warning, suspension or cancellation)
A suspension or revocation will result in a complete ban on the use of the GRASP compliance letter and any device or documentation associated with GRASP coverage (all products, all sites).
A producer who has received a cancellation will not be accepted for a new GRASP assessment for the period specified in the GLOBALG.A.P general regulations.
Non-compliances and non-conformities of manufacturers without a letter of conformity are recorded in GLOBALG.A.P Information Systems systems and made accessible in accordance with GLOBALG.A.P.'s data access rules.

11.5.5 GRASP Letter of Compliance and Evaluation Cycle

In addition to the current GLOBALG.A.P general regulations and GLOBALG.A.P general add-on rules regarding the certification process, the following GRASP-specific rules apply:
a) A GRASP compliance letter will be issued if and only if a valid GLOBALG.A.P Integrated Farm Assurance certificate is available and there is evidence of verification and full compliance with the Principles and Criteria on worker welfare.
b) GRASP compliance letter is issued only after the required Major Must and Minor Must levels are reached and documented in GLOBALG.A.P Information Operations systems.
c) The GRASP compliance letter is issued for the same legal entity (i.e. producer group/multi-site producer) that holds the valid GLOBALG.A.P Integrated Farm Assurance certificate.
d) The evaluation approval cycle is 12 months, subject to any sanctions and extensions in accordance with the described scope.

11.5.6 GRASP Letter of Compliance

The letter of conformity is published through the GLOBALG.A.P Information Processing system in accordance with the current GLOBALG.A.P general regulations and GLOBALG.A.P general add-on rules.

12. SPRING_Sustainability Programme for Irrigation and Groundwater Use GLOBALG.A.P General Regulations Specifications for the Sustainable Program for Irrigation and Groundwater Use (SPRING)

12.1 Certification Options

SPRING audits are carried out for the following options:

- Option 1 – Individual Producers
- Option 1 – Individual Multi-Site Producers with QMS
- Option 2 – Producer Groups

12.2 Registration Process with the CB

The company whose Main Standard, i.e. Integrated Farm Assurance audit is carried out by ETKO, is registered for the SPRING audit.
It is not necessary to upload documents determining the volume of water used in cubic meters per hectare per year. (This information is not for public use.)
The duration of the service contract is agreed between ETKO and the producer. The contract between ETKO and the producer is independent of the contract between FoodPLUS GmbH and the owner of the add-on (SPRING).
ETKO includes the SPRING scope as part of the GLOBALG.A.P sublicense and certification agreement signed between ETKO and the producer.
Parallel Ownership is possible. However; Parallel Ownership is not allowed in the case of Option 1 individual producers (single site and multi site). However, Parallel Ownership is allowed in the case of Option 2 producer groups and only in relation to producer group members and not to products.

12.3 Inspection Process

12.3.1 Inspection Process – Option 1 Individual Producers

12.3.1.1 Producer Self-Assessment

It is expected that self-assessments will be carried out and all rules will be followed according to all principles and criteria specified in the GLOBALG.A.P general regulations and the Integrated Farm Assurance section of this procedure.

12.3.1.2 CB Audits

Annual announced CB audits are carried out. And SPRING unannounced CB audits are carried out together with the audit conducted against the Integrated Farm Assurance standard according to the GLOBALG.A.P general regulations.
In accordance with the GLOBALG.A.P general regulations, the CB audit can be divided into off-site and on-site stages.
The BK inspection can be carried out remotely together with the Integrated Farm Assurance standard audit according to the GLOBALG.A.P Full Remote audit procedure.
The duration of the audit varies depending on the size of the farm and the complexity of the production activities, and in the simplest case it will be around two hours.

The timing of the CB audit is set to coincide with the Integrated Farm Assurance standard audit in accordance with the GLOBALG.A.P general regulations.

The Initial and Subsequent CB Audits are carried out as specified in the GLOBALG.A.P general regulations and in the Integrated Farm Assurance section of this procedure. Note: The initial SPRING audit may be carried out at a different time from the Integrated Farm Assurance audit. However, all subsequent BK audits are carried out at the same time as the Integrated Farm audit.

12.3.2 Audit Process – Option 2 Producer Groups or Option 1 Multi-Site Producers with QMS

12.3.2.1 Internal Audits

Internal audits are expected to be carried out in accordance with all principles and criteria in the GLOBALG.A.P general regulations and to comply with all rules. Internal auditors who will carry out the internal audit of the QMS department and the farm are expected to have the qualifications specified in the GLOBALG.A.P general regulations.

12.3.2.2 CB Audits

Announced QMS audits are carried out annually and together with the Integrated Farm Assurance standard audit, in accordance with the GLOBALG.A.P general regulations.

Unannounced QMS audits are carried out together with the recertification audit of the Integrated Farm Assurance standard, in accordance with the GLOBALG.A.P general regulations.

CB Farm audits are carried out together with the Integrated Farm Assurance standard audit, in accordance with the GLOBALG.A.P general regulations.

CB QMS audits can be divided into off-site and on-site stages in accordance with the GLOBALG.A.P general regulations. It is possible to conduct CB audits together with the Integrated Farm Assurance standard audit according to the GLOBALG.A.P Full Remote Audit procedure.

CB farm and QMS audit durations depend on the size of the farm and the complexity of the production activities, and in the simplest case, they are carried out in the range of approximately one hour for members of the Option 2 producer group and for multi-site producers with Option 1 QMS.

The timing of the CB audit is set to occur at the same time as the Integrated Farm Assurance standard audit according to the GLOBALG.A.P general regulations.

Initial and Subsequent CB Audits are carried out as specified in the GLOBALG.A.P general regulations and in the Integrated Farm Assurance section of this procedure.

12.4 Certification Process

In order to be entitled to certification, 100% compliance with Major Obligations in CB Farm audit, 75% compliance with Minor Obligations and 100% compliance in QMS audit are required. In case of compliance with these conditions, a certification decision is taken and a letter of conformity (instead of a certificate) to be created via GLOBALG.A.P IT systems is given to the individual producer or producer group.

Extension of the validity period of the letter of conformity is carried out simultaneously with the Integrated Farm Assurance standard according to GLOBALG.A.P general regulations.

For corrective activities after the first CB audit; the rules regarding the closure of non-conformities specified in GLOBALG.A.P general regulations and in the Integrated Farm Assurance section of this procedure are applied.

For corrective activities after the subsequent CB audit; it is expected that the non-conformities are closed within 28 calendar days in accordance with GLOBALG.A.P general regulations.

Since the SPRING plugin logo is not available, the use of the logo is not possible.

13. Changes in the entrepreneur/producer/producer organization System

The entrepreneur/producer/producer organization will inform ETKO officially in writing in a timely manner in case of any changes, including changes in the production system and processes (such as location changes, additional areas, changes in name, shareholders, scope, etc.). ETKO will evaluate the impact of the changes on certification and whether an additional surveillance control is required. If it is determined that a surveillance control is necessary, the use of the ETKO logo or label by the entrepreneur/producer/producer organization is not allowed until this control is carried out. In this case, the entrepreneur/producer/producer organization will be informed by ETKO. The planning of this control will be done by the ETKO control department manager and the controller, and after the control, the fee will be collected from the entrepreneur.

If there are changes that are limited to the production system and do not affect the certification, or if there are changes in the documentation, these changes will be reviewed by the controller at the next control visit.
NOTE: All changes in production and documentation will be recorded and kept by the entrepreneur/manufacturer/producer organization for the controller.

14. Suspension, Withdrawal and Cancellation of Certificate.

If non-conformity is detected; Warning, suspension or cancellation sanctions may be imposed.
If a clear link is established between a manufacturer and a public health outbreak, certification will be suspended while the manufacturer's certification is reviewed.
When the sanction can only be lifted by ETKO; Producer/producer groups and multisite producers cannot switch to another certification body until the non-conformity causing the relevant sanction is closed.

- • A warning is issued for any detected non-conformance (i.e. non-compliance with CPCC or contractual requirements).
- • If a nonconformity is detected during the audit, a warning is given to the producer/ to the certificate holder at the end of the audit. This is a temporary report that may be overridden by the certifier.

WARNING:

- In the first inspections; If an individual operator or producer or producer organization does not comply with the 100% Major Must and 95% Minor Must control points for the IFA Scope and 100% of the Major Must and/or more than one Minor Must control point for the Supply Chain scope within 28 days of the initial inspection, a status of “clear non-compliance” will be determined in the GLOBALG.A.P Database. And if the cause of the alert is not resolved within three (3) months, a full audit will be conducted before the certificate is issued.
- In surveillance audits; In the event of non-compliance with Contracts, General Requirements or Major Must or there is an extraordinary incompatibility such as more than one Minor obligation incompatibility, the certificate will be suspended if the non-compliance cannot be closed within 28 days.This period may be shortened depending on the criticality of the nonconformity in terms of worker, environmental and consumer safety. In cases where there is a serious threat to food safety, employee safety, the environment, consumers and/or product integrity (for example, the sale of non-certified products as certified), the certification is immediately suspended. This is communicated with a formal warning letter.

SUSPENSION:

- If the appropriate corrective actions for the nonconformities detected in the audit (surveillance audit) are not communicated to ETKO within 28 days, an immediate suspension is applied.
- Only CBs can lift the suspensions they impose on certificate holders.
- Suspension may be applied to one, several or all of the products within the scope of the certificate. A product cannot be partially suspended for a single producer (single or multi-site), meaning the entire product is suspended. If the appropriate corrective action for the nonconformity that is the reason for the suspension is not communicated to ETKO within 12 months, cancellation will be applied.
- During the suspension period, the manufacturer is prohibited from using the GLOBALG.A.P logo/trademark, license/certificate or any other form of documentation that is in any way linked to GLOBALG.A.P in relation to the suspended product.
- Producer; If appropriate corrective action for the relevant non-conformity is forwarded to ETKO within 12 months following the suspension of the certificate, this evidence may be examined and the relevant sanction may be removed. This review can be performed in the field or at a desk. In case the examination is carried out through on-site examination; The review may be conducted with or without

notice, as a full review, or as an evaluation of only the evidence presented.

- The suspension remains effective unless ETKO remove it or imposes a revocation sanction.

Supply Chain Scope Specific Suspension Requirements:

- a) A suspension may apply to one, several or all of the scopes covered by the GLOBALG.A.P Supply Chain certification.
- b) A scope cannot be partially suspended for a single company, i.e. the entire scope is suspended.
- c) During the suspension period, the company is not allowed to use the GLOBALG.A.P claim, including logos/trademarks, licenses/certifications and/or any other type of documentation in any way related to GLOBALG.A.P in relation to the suspended scope.
- d) If the company notifies ETKO that the non-compliance has been resolved before the specified time, the relevant sanction will be lifted, subject to satisfactory evidence and closure.
- e) The suspension will not delay the renewal date or allow the company to evade payment of registration and/or other applicable fees.
- f) If the reason for the suspension is not resolved within the specified time period, coverage cancellation will be applied.
- g) There are two types of suspension situations as explained below.

Suspension of Supply Chain Certification by Manufacturer Request::

- a) A certified manufacturer/company may voluntarily request the relevant ETKO to suspend one, several or all of the scopes covered by the GLOBALG.A.P Supply Chain certificate (if ETKO has not imposed a sanction beforehand). This may happen if the company has difficulty complying with the standard and needs time to close any non-conformances.
- b) The company's status is changed to "self-declared suspension" at the scope level.
- c) The deadline for closing the non-conformance(s) is determined by the declaring company. The deadline is agreed upon with ETKO and ETKO ensures that the non-conformance(s) are closed before lifting the suspension.

Suspension of a Company by ETKO:

- a) ETKO may decide to suspend and lift the suspension decision for a company it has certified.
- b) ETKO will decide to suspend when the manufacturer/company cannot show evidence that effective corrective actions have been implemented after a warning has been given.
- c) ETKO may decide to suspend a specific scope, several scopes or all scopes of a company it has certified.
- d) After the suspension is applied, ETKO determines the period allowed for correction.

SUSPENSION DUE TO MANUFACTURER'S REQUEST:

- An entrepreneur or producer or producer organization may voluntarily request the suspension of one, some or all of the non-sanctioned products within the scope of the certificate. This may occur if the manufacturer has difficulty complying with the standard and needs time to close any non-conformances.
- This suspension will not delay the renewal date and will not allow the producer to avoid paying registration and other applicable fees.
- The deadline for closing the non-conformity is determined by ETKO and the entrepreneur/producer/producer organization.
- The same applies for members of a producer group, who may voluntarily ask the respective producer group to temporarily suspend their product(s). Here too, the deadline for rectifying non-

conformances is set by the declaring producer group member and shall be set in agreement with the respective QMS. GG_GR_Rules_for_QMS_v6_0-7.4.3.3.d)

- The product status in the GLOBALG.A.P Database for the relevant products is set to “self-declared suspension”.

CANCEL:

- If there is evidence that may cause fraud and/or insecurity, ETKO obtains objective evidence showing that the certificate holder is abusing the GLOBALGAP claim (Any abuse is forwarded to GLOBALGAP Community Members) or if the appropriate corrective action for the nonconformity that is the reason for suspension is not communicated to ETKO within 12 months, cancellation will be applied. (GG_GR_Rules_for_QMS_v6_0-7.4.3.4.ii)
- The entrepreneur/producer/producer organization whose contract has been cancelled; The use of the GLOBALG.A.P logo/trademark, certification or any other document that may be associated with GLOBALG.A.P is strictly prohibited.
- GLOBALG.A.P certification applications of canceled manufacturers will not be accepted within 12 months from the date of cancellation.

15. Objections and Complaints

If the Entrepreneur/Producer/producer organization wishes to object to any decision of ETKO regarding certification, it will apply in writing to info@etko.com.tr by filling out the "Dispute & Objection and Complaint Application Form" on the ETKO website.

16. Privacy

Except for cases required by national laws or accreditation bodies, ETKO will keep confidential the information obtained during the contract and certification process about the entrepreneur/producer/producer organization and will not disclose it to third parties, unless the entrepreneur/producer/producer organization gives written permission for this. The entrepreneur/producer/producer organization is informed that information will only be shared when required by law and that no information will be shared without the consent of the entrepreneur/producer/producer organization. The entrepreneur/producer/producer organization accepts the verification and control activities of accreditation bodies by signing a contract with ETKO for certification services at the application stage. If it does not sign, it is not included in the certification process.

In addition, GLOBALG.A.P and ETKO can see all the data in the database in GLOBALG.A.P and can be used for the certification process and sanction procedures. And the certification history of manufacturers included in the database is available to market participants. Minimum and mandatory data publication and other information regarding privacy and data use are specified in the 'GLOBALG.A.P Data Access Rules' on the ETKO website.

17. Postponement and Cancellation

If the payment is not made two weeks before the determined control date, ETKO may cancel the control. In cases where controls are canceled by ETKO or the entrepreneur/producer/producer organization, the following fees are charged:

- If the cancellation of the control is notified more than two weeks from the control day, 15% of the determined total fee and the total expenses incurred (such as flight tickets, visa costs, etc.).
- If the control is canceled within two weeks or less; 50% of the determined total fee and total expenses incurred must be paid to ETKO**.**

18. Legal Aspects

In case of any dispute that may arise, the courts at the place of production are authorized for individual producers, and the courts at the location of the legal entity (institution) to which it is affiliated are located for group producers.

19. Information Exchange

In case there is an entrepreneur/manufacturer/producer organization working within the same scope with another certification body at the same time, ETKO will exchange information with the other certification body. This is to prevent documentation from being abused.

When necessary, ETKO may also exchange information with competent authorities such as the Ministry, GLOBALGAP, Accreditation body and other certification bodies.

If the entrepreneur/producer/producer organization changes the certification body, the documents and information regarding this change will be notified to the competent authorities by ETKO without delay. ETKO forwards the files, audit reports and nonconformities containing valid information about the entrepreneur/producer/producer organization in question to the new certification body.

Producers, producer organizations and entrepreneurs; Notifies ETKO of any changes made in their legal structures, agricultural activities or production areas within one month at the latest.

Informing ETKO without delay about legal, commercial, structural status or ownership, organization, management, product or production method, Contact address and production locations, significant changes in the quality management system that may affect the adequacy of compliance with the certification conditions.

ETKO checks that the nonconformities specified in the reports of the previous authorized organization of the entrepreneur who transferred to ETKO from another authorized organization have been or are being eliminated by the entrepreneur.

If it detects a discrepancy or violation that will affect the status of the certified product, ETKO immediately notifies the relevant competent authorities.

The competent authorities in question may, at their discretion, request other information regarding the non-compliance and/or violations.

ETKO publishes the current lists of the good agricultural activities of the entrepreneurs in its control system on its website.

20. GLOBALGAP Information Sharing GG_GR_Rules_for_CBs_v6_0 5.3 & 6.2.2

ETKO, GLOBALG.A.P. Keeps the following information updated in the Information Technology System in accordance with GLOBALG.A.P registration data requirements and GLOBALG.A.P data access rules: GG_GR_Rules_for_CBs_v6_0 5.3

- Current status and status history
- Products
- Areas/volumes for each unique producer (legal entity) across all standards and Options (per product), with centralized verification of certificates and letters of conformity by market participants
- Audit and compliance details uploaded to the Audit Online Platform (AOH) in accordance with the Audit Online Platform (AOH) upload rules

When ETKO receives a positive certification decision, the product status is GLOBALG.A.P. It ensures that the certificate is published after it is updated to "certified" in the database systems. GG_GR_Rules_for_CBs_v6_0 5.3

ETKO ensures that as soon as a sanction is issued, the producer's situation is reviewed by GLOBALG.A.P. Ensures that database systems are updated to reflect the current status (ensuring that the time between the issuance of sanctions and the status update in GLOBALG.A.P. Database systems is not more than one business day) GG_GR_Rules_for_CBs_v6_0 5.3

ETKO, GLOBALG.A.P. Ensures that the status of all manufacturers in the database systems is up to date. GG_GR_Rules_for_CBs_v6_0 5.3
ETKO ensures that information on all audit details (including announced, unannounced and surveillance audits) as well as details for each certificate is instantly accessible. GG_GR_Rules_for_CBs_v6_0 5.3
FoodPLUS GmbH and/or GLOBALG may be subject to this, such as if the certificate holder is facing a complaint regarding food safety, employee welfare (i.e. potentially involved in a foodborne outbreak) or environmental protection, is being tried in a court of law, or has been found by a court to have violated a national or international law. .When a situation that may endanger the reputation and reliability of the A.P standard is detected, the GLOBALG.A.P Secretariat is notified within 24 hours GG_GR_Rules_for_CBs_v6_0 5.3
ETKO shares the current "GLOBALG.A.P data access rules" on its website and informs the manufacturer by publishing news and email notifications in every update. GG_GR_Rules_for_CBs_v6_0 6.2.2.a & b
Data access rules will be defined and signed by the manufacturer during registration with ETKO. The data owner is responsible for ensuring data access and determining its level. However, the data subject may delegate responsibility to other users (e.g. UK). GG_GR_Rules_for_CBs_v6_0 6.2.2.c
The manufacturer may provide personal data to trading partners previously authorized by the manufacturer, or the manufacturer may instruct a third party to provide this data. This authorization can be canceled online at any time. Any other access to the manufacturer's personal data is illegal. GG_GR_Rules_for_CBs_v6_0 6.2.2.d

21. GLOBALG.A.P. Changing the Certification Body (CB) of the Producer/Producer Group Certified Under GG_GR_Rules_for_CBs 9

21.1 General Rules GG_GR_Rules_for_CBs 9.1

This procedure is GLOBALG.A.P. In any case, including if its regulations contain more stringent conditions than ETKO's regulations, ETKO does not unduly or unfairly restrict the producer/producer group's freedom to choose another Certification Body.
GLOBALG.A.P. GLOBALG.A.P. to ensure that the integrity of the certification is maintained and to ensure that the producer/producer group's certification history is addressed during the review process when the producer/producer group signs a contract with a CB. The process to be followed when the producers/producer groups in the database move from another UK to ETKO or from ETKO to another UK is as follows:

- Producer/Producer Group GLOBALG.A.P. Must be registered in the database
- Existing sanctions, if any, must be lifted before the Producer/Producer Group's transition to the new UK. As an exception, in cases where there are existing sanctions and the certification cycle has ended, the previous CB may lift the unresolved sanction in order to ensure the transition of the producer/producer group to the other CB, provided that the reason for the non-conformity is properly explained to the CB where the transition will be made.
- The existing GGN of the producer or producer group is not changed. Dual registration is not allowed (i.e. a producer or producer group can only have one GGN, even if the same producer or producer group is affiliated with more than one GGN).

  If a producer/ producer groups/multisite producers who has already been registered changes CBs or applies to a new CB for certification of a different product, the producer/ producer groups/multisite producers shall communicate the previously assigned unique GLOBALG.A.P. identification number to the new CB. Failure to do so will result in a surcharge fee of €200 to the producer and an additional fee of €700 for the producer group.
  Individual producer group members of a producer group are not allowed to leave the group and register with another group (for the same products already registered) if there is any pending sanction on the producer group member issued by the producer group or there are any issues relevant to the producer group member raised by the CB that have not been closed. (230620_GG_GR_Rules_for_IP_v6_0_Sep22_5.2.3, 230620_GG_GR_Rules_for_QMS_v6_0-5.2.3)

- Before the transition of the producer/producer group is accepted, a sublicense and certification agreement is signed with the producer/producer group and the registration process is completed. The transfer of

producers/producer groups to another CB may occur when the current certificate of the producer or producer group expires and there is no binding service contract between the producer/producer group and the previous CB. And the producer/producer group can apply for certification in another CB for the next certification cycle. If the producer/producer group wants to move to another CB before the certificate validity period expires, the validity period of the producer/producer group's current certificate may be shortened by the previous CB, but it will always be in agreement with the producer and in coordination with the accepting CB to prevent gaps in the certification.

• If the signing date of the 'GLOBALG.AP Sublicense and Certification Agreement' and the "Audit Date" are after the expiry of the validity period of the certificate issued by the previous CB, there will be a period when the producer/producer group does not have a valid certificate. However, if the signing date of the 'GLOBALG.AP Sublicense and Certification Agreement' and the "Audit Date" are before the expiry of the validity period of the certificate issued by the previous CB, the certification decision can be taken as soon as the current certificate expires. In this case, there will be no gap in the certification cycle of the producer/producer group. If the certification decision is made after the certificate issued by the previous CB expires, there will be a gap in the certification process of the producer/producer group, even if the signing date of the 'GLOBALG.AP Sublicense and Certification Agreement and the "Audit Date" are before the expiry date of the certificate. The previous CB remains responsible until its certificate expires. During the validity of the certificate issued by the previous CB, the new CB informs the previous CB so that it can carry out appropriate follow-up regarding the non-conformities it detects.

• The producer/producer group can sign a 'GLOBALG.A.P Sublicense and Certification Agreement' with the new CB while under contract with the previous CB. The 'GLOBALG.A.P Sublicense and Certification Agreement' signed by the new BK, however, is based on the fact that the previous BK has transferred the GGN of the producer/producer group to GLOBALG.A.P. It becomes binding after transferring it to the new BK in the database.

• During the process of changing the CB, the registration of the products to the Database may not be completed before the audit and the certification decision may not be taken within 28 days after the audit/closing of non-conformities.

21.2 Transition to Another Certification Body during the extension of certificate validity GG_GR_Rules_for_CBs 9.2

If an extension of validity is available, the manufacturer cannot change the certification body for 12 months after the original certificate validity date.

If the certification body to which the transition is intended to be made does not request termination from the previous certification body before the audit is accepted, the manufacturer's transition to the new certification body will not be possible and the original certificate will be certified by this previous certification body for 12 months after the validity date (CB cannot make changes). The exception to this issue applies only if the previous certification body explicitly requests the termination of the extension and notifies the GLOBALGAP Secretariat to transfer the unique GLOBALGAP Number to the certification body to which the transition is intended. The GLOBALGAP Secretariat only processes transfer requests from the previous certification body. The authority to release a customer with a valid contract belongs entirely to the certification body with which the valid contract in question has been signed.

If the transfer is accepted, the validity period of the certificate issued by the new certification body to which the transfer is made is calculated by subtracting the validity period of the certificate issued by the previous certification body from 12 months.

22. GLOBALGAP Burden of Proof GG_GR_Rules_for_Individual Producers 7.1 & GG_GR_Rules_for_Producer Groups and Multisite Producers with QMS 7.1

In the event of information about a GLOBALG.A.P certificate holder that may have a potential impact on certification status communicated to the GLOBALG.A.P Secretariat, it is the responsibility of the certificate holder and ETKO to verify the claim and provide evidence of compliance with the relevant GLOBALG.A.P standards.

ETKO may conduct additional announced or unannounced CB inspections or on-site visits to investigate complaints.
ETKO reports the relevant findings and measures taken to the GLOBALG.A.P Secretariat within the specified period.
If the certificate holder and ETKO fail to provide the required proof of compliance within the period defined by the GLOBALG.A.P Secretariat, they will be subject to sanctions according to the sanction procedures described in the GLOBALG.A.P General Regulations.
If the evidence includes laboratory analysis, accredited laboratories (ISO/IEC 17025) and independent sampling (according to the rules set out in the relevant Principles and criteria) will be involved.
The certificate holder is facing a complaint or has been prosecuted in a court of law, or has been found by a court to have violated a national or international law, relating to food safety, employee welfare, or environmental protection, and these actions are in violation of FoodPLUS GmbH and/or the GLOBALG.A.P standard. If there is a risk of jeopardizing its reputation and reliability, the certificate holder will inform ETKO within 24 hours.