

# **GLOBALG.A.P. REMOTE**

**INTERIM FINAL ENGLISH VERSION 1.3** 

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# GLOBALG.A.P. EMERGENCY PROCEDURE FOR REMOTE INSPECTIONS DUE TO THE CORONAVIRUS PANDEMIC (GLOBALG.A.P. REMOTE)

#### **SUMMARY**

- GLOBALG.A.P. is continuing to monitor and assess risks and recommendations in the face of the outbreak and rapid spread of coronavirus disease 2019 (COVID-19). Recent global developments have led to significant health and safety concerns, as well as to travel/movement restrictions in numerous countries and territories.
- 2. Due to movement/travel restrictions within some regions imposed as a result of the coronavirus, GLOBALG.A.P. inspections that become due may be postponed.
- 3. The emergency procedure published by GLOBALG.A.P. on 26 March 2020 is in line with the requirements of the Global Food Safety Initiative (GFSI) but **does not address** certification for new and existing clients based on remote inspections.
- 4. GLOBALG.A.P. Remote covers initial certification, re-certification, certificate scope extension, transfer, etc. based on fully remote inspections. GLOBALG.A.P. Remote is applicable to all GLOBALG.A.P. standards, including localg.a.p./Primary Farm Assurance for each scope and subscope, except the GFSI-recognized standards: Integrated Farm Assurance (IFA) v5.3-GFS, IFA v5.4-GFS, Harmonized Produce Safety Assurance (HPSS) and Produce Handling Assurance (PHA). Also included is the CBL Chain of Custody standard version 3. Initial certifications based only on GLOBALG.A.P. Remote shall not be considered accredited until the first on-site follow-up inspection has been successfully completed (see chapter 4.4).
- 5. Unless otherwise specified in this procedure, the respective rules of the given standard and/or add-on apply.
- 6. Whenever GLOBALG.A.P. Remote has been used to issue a certificate or to extend the scope of an existing one, this shall be clearly indicated to inform all market participants or the public, whichever is applicable according to the relevant Data Access Rights, that the certificate or the extension is based on remote inspections (see chapter 1.5).
- 7. GLOBALG.A.P. Remote also applies to all GLOBALG.A.P. add-ons as per approval by the add-on owner. See Annex I for the list of applicable add-ons. GLOBALG.A.P. will continuously update this list in case additional add-on owners decide to join the GLOBALG.A.P. Remote procedure. In case an add-on inspection was conducted based on the GLOBALG.A.P. Remote procedure, this is added as a product attribute into the GLOBALG.A.P. database and is visible to GLOBALG.A.P., the CB, and the respective add-on observers.
- 8. GLOBALG.A.P. Remote is to be implemented for all control points, similar to an on-site inspection.
- 9. This emergency procedure is valid during the COVID-19 pandemic until further notice. Depending on the developments with regard to COVID-19, GLOBALG.A.P. reserves the right to terminate its validity with appropriate notification.



### **GLOBALG.A.P. REMOTE PROCEDURE**

#### 1 <u>GENERAL</u>

In this document, whenever the term "inspector" is used, it shall refer to inspector, auditor, or assessor depending on the relevant option for certification – standard or add-on.

In this document, whenever the term "inspection" is used, it shall refer to inspection, audit, or assessment depending on the relevant option for certification – standard or add-on.

In this document, whenever the term "certificate" is used, it shall refer to certificate, proof of assessment, letter of conformance, or letter of attestation.

Within the context of this document, the term "producer(s)" refers to persons (individuals) or businesses (company, individual producer, or producer group) that are legally responsible for the production processes and the products of the respective scope, sold by those persons or businesses. It also refers to Chain of Custody companies.

In this document, whenever the term "general regulations" is used, it shall refer to the GLOBALG.A.P. general regulations and/or the add-on general rules. Whenever specific rules are referred to, they are identified by including the name of the particular standard or add-on.

Within the context of this document, "auditee" is the producer or producer's personnel being inspected.

- 1.1 GLOBALG.A.P. Remote applies only when official travel or gathering restrictions are in place in the country or region (where the inspection shall take place) or there is a company policy of the certification body (CB) or of the producer that is based on an official or reputable source (e.g., the company restricts travel to/from regions identified as high-risk by the national ministry of foreign affairs or the World Health Organization or governmental "requests for citizen cooperation"). The CB shall keep evidence of the emergency status to justify the use of this procedure.
- 1.2 GLOBALG.A.P. Remote includes: **1**) a review of documents and records similar to the off-site module as defined in the GLOBALG.A.P. general regulations v5.2 Part I, 5.1.2.1, 5.2.2.1, and Part III, 5.2, 5.4.1.1, which can be performed offline or online; and **2**) a virtual meeting to check all requirements that would normally need to be reviewed on-site and could not be answered during 1) and also to verify the consistency of records reviewed in 1). Both 1) and 2) are conducted remotely and may be performed at once or in two (or more) separate parts, as decided by the CB using information and communication technology (ICT).
- 1.3 The document review and virtual meeting shall not be performed more than 4 weeks apart. These 4 weeks shall also include the planning and testing of the ICT used for the remote inspection.
- 1.4 During the application (registration) process, the CB shall collect information and verify that the producer has the necessary infrastructure to support the use of the ICT proposed for remote inspection. Records shall be kept.
- 1.5 The use of GLOBALG.A.P. Remote is identified clearly in the database and on the producer's paper certificate. GLOBALG.A.P. Remote is established as a product attribute on the certificate.
  - 1.5.1 The paper certificate shall also indicate the risk level (refer to 1.9) together with the Remote attribute (e.g., Apple Remote Low risk).
- 1.6 GLOBALG.A.P. Remote may result in a negative decision for certification; not only by the relevant provisions described in the general regulations, but also if the credibility (integrity) of the remote inspection is jeopardized (see points 2 and 3).
- 1.7 In the case of re-certification, if the certificate has not been extended yet, the registered products shall be accepted by the CB in the GLOBALG.A.P. database for the new cycle.
- 1.8 If the producer has already asked for a certificate extension and the CB has accepted the certificate extension and the new cycle, the producer is not allowed to change the CB unless the outgoing CB allows the transfer.



- 1.9 The CB shall classify the producers participating in GLOBALG.A.P. Remote according to the risk of issuing a certificate based on this procedure:
  - 1.9.1 Not eligible:
    - GLOBALG.A.P. Remote inspections shall not be conducted for certificate holders where more than 10 non-conformances (Major Must control points or QMS) were identified during the last two consecutive inspections (including announced, unannounced, surveillance, and remote inspections) on the date of the inspection. In the case of an Option 2 or Option 1 multisite with QMS, the non-conformances shall be calculated as follows:
      - QMS level: more than 10 non-conformances (QMS)
        - OR
      - Producer group member/site level: if any of the producer group members selected during the CB sampling had more than 10 non-conformances.
    - Producers classified as "high-risk" who were already certified using GLOBALG.A.P. Remote in the previous cycle and where the follow-up on-site inspection has not been conducted. (I.e., a producer cannot be certified for a subsequent cycle only based on GLOBALG.A.P. Remote without an on-site follow-up inspection.)

Producers in the cases described above are "not eligible" and shall only be certified based on an onsite inspection.

- 1.9.2 High risk:
  - New producers (those never certified before for GLOBALG.A.P. or whose certificate expired more than 12 months ago);
  - When the GRASP add-on is evaluated together with IFA or an equivalent standard classified as high-risk, GRASP shall also be classified "high-risk";
  - Chain of Custody companies that pack/repack and label/relabel products directly or via a subcontractor, and companies taking physical possession of bulk products bought directly or via a subcontractor (see chapter 4); and
  - Producers certified using GLOBALG.A.P. Remote in the previous cycle and classified as "medium-risk" for the previous cycle.
- 1.9.3 Medium risk:
  - Re-certification of producers with non-conformances identified during the last on-site inspection (including for the add-ons) on the date of the inspection;
  - Producers that change CBs (If the new CB cannot verify that during each of the last two on-site inspections no more than 10 non-conformances (Major Must control points or QMS) were identified (per certificate holder), the producer shall be classified as "not eligible" for GLOBALG.A.P. Remote.);
  - Producers with only one previous inspection performed on-site;
  - Producers whose certificate expired less than 12 months ago;
  - Producers certified against IFA or an equivalent scheme, which is classified as medium risk, for which producer GRASP is added during the certificate validity of an on-going certificate for a first time;
  - GRASP producers with any overall assessment result other than "fully compliant";
  - Chain of Custody companies that take physical possession of packed and labeled products directly or via a subcontractor (see chapter 5); and
  - Producers certified using GLOBALG.A.P. Remote in the previous cycle and classified as "low risk" for the previous cycle.



- 1.9.4 Low risk:
  - Re-certification of producers with no non-conformances identified during the last on-site inspection;
  - GRASP producers with previous overall assessment result "fully compliant";
  - Chain of Custody traders/brokers without physical possession of the certified products (see chapter 6).
- 1.9.5 Add-ons that need to be added during the certificate validity of an ongoing certificate will follow the risk classification of the main certificate, excluding the GRASP-specific risk classification defined above.
- 1.9.6 When GRASP assessment is performed using the GLOBALG.A.P. Remote procedure, Annex VI: GLOBALG.A.P. COVID-19 INTERVIEW PROTOCOL of the GRASP general rules in its current version shall be used together with this procedure.
- 1.10 For GLOBALG.A.P. Remote, the full final inspection report, including the checklist, shall be made available to GLOBALG.A.P. Producers shall agree that the full inspection report is made available to GLOBALG.A.P. Any information relating to an identified or identifiable natural person such as names or data clearly linkable to responsible persons or any other employees shall not be entered in the "Remarks/Comments" field of the full inspection report.
  - 1.10.1 For IFA v5.2, FSMA PSR, and the Nurture Module, the checklist shall always be uploaded through the GLOBALG.A.P. Audit Online Hub within 28 days after the closure of any outstanding non-conformances or on the day of positive or negative certification decision, whichever comes first.

Regarding the use of the GLOBALG.A.P. Audit Online Hub, various options are available:

- a) Complete the inspection checklist within the GLOBALG.A.P. Audit Online Hub
- b) Utilize the Excel upload opportunity within the GLOBALG.A.P. Audit Online Hub
- c) Connect the individual CB software solution and send the required data via application programming interface (API)
- d) Utilize third-party software compatible with the GLOBALG.A.P. Audit Online Hub; see <u>https://www.globalgap.org/uk\_en/what-we-do/the-gg-system/GLOBALG.A.P.-Audit-Online-Hub/</u>

For GRASP, the regular upload procedure in the GLOBALG.A.P. database shall be applied.

- 1.10.2 For all other standards and add-ons, the inspection report shall be uploaded in the GLOBALG.A.P. database within 28 days after the closure of any outstanding nonconformances or on the day of the (positive or negative) certification decision, whichever comes first.
- 1.11 All requirements related to inspection timing defined in the general regulations apply without change, unless indicated otherwise in this document.
- 1.12 The overall duration for remote inspections may not be less than the usual on-site inspection performed by the CB and the duration defined in the respective normative documents, if applicable. Common practice indicates that remote inspections require additional time.
- 1.13 The CB shall justify and record if no additional time was required for the remote inspection.
- 1.14 GLOBALG.A.P. Remote inspections shall be performed only by finally approved CBs and not by provisionally approved CBs. The CB inspectors shall be approved for the relevant standard, scope, sub-scope, and add-on. It is not possible to approve a CB and/or inspector only for GLOBALG.A.P. Remote inspections.



- 1.15 In cases of subsequent inspection (except in the case of a transfer between CBs) and scope extensions, the CB shall use the same inspector for the remote inspection who also performed the previous inspection. Exceptions from these rules are allowed on a case-by-case basis by the GLOBALG.A.P. Secretariat. Contact <u>standard\_support@globalgap.org</u>. Resource constraints are not a valid reason to grant an exception to this rule.
- 1.16 The document review and the virtual meeting of GLOBALG.A.P. Remote shall be performed by the same inspector(s).
- 1.17 For IFA Crops rules:
  - 1.17.1 Crops rules 2.5 e): If the produce handling unit (PHU) already has a post-farm gate food safety certification recognized by the GFSI for scope D (www.mygfsi.com), the CB inspector shall inspect segregation and traceability (i.e., IFA AF 11, AF 13, CB 1.1, HPSS 10, 12) as well as post-harvest treatments (IFA FV 5.8.1-10, HPSS 5) using GLOBALG.A.P. Remote for this PHU.
  - 1.17.2 If the PHU is subcontracted and does not have a valid GLOBALG.A.P. IFA (or GLOBALG.A.P. Remote) certificate, a remote inspection of the PHU shall be performed as well.
- 1.18 GLOBALG.A.P. Remote may be used, as general exception, for witnessing inspectors remotely (for initial sign-off, for transfer of inspectors between CBs, and for maintenance of inspector competency). In the case of initial sign-off and transfer of inspectors between CBs, the CB shall conduct a follow-up physical on-site witness inspection to the inspector within next 12 months or the inspector shall lose their approval until a physical on-site witness inspection can be conducted. In the case of maintenance of inspector competency, the CB shall conduct a follow-up physical on-site witness inspection to the inspector shall lose their approval until a physical on-site witness or the inspector shall lose their approval until a physical on-site witness or the inspector shall lose their approval until a physical on-site witness or the inspector shall lose their approval until a physical on-site witness or the inspector shall lose their approval until a physical on-site witness or the inspector shall lose their approval until a physical on-site witness or the inspector shall lose their approval until a physical on-site witness inspection can be conducted. The inspector being witnessed may be present on-site or remotely for the remote witness inspection.
- 1.19 For initial sign-off of inspectors, GLOBALG.A.P. Remote may be used, as general exception, for the mandatory observation of inspections prior to the witness inspection. The observing inspector may be present on-site or remotely for the remote witness inspection.
- 1.20 When the witnessing inspector is witnessing the inspection remotely (i.e., by using GLOBALG.A.P. Remote), the inspection report including the checklist shall be uploaded to the GLOBALG.A.P. Audit Online Hub or in the GLOBALG.A.P. database, according to the requirements described in 1.10.
- 1.21 Exceptions for maintenance of inspector competency or for the requirements for the annual minimum number of inspections may be granted on a case-by-case basis. Contact <u>standard\_support@globalgap.org</u>.
- 1.22 For the rotation of inspectors, exceptions may be granted on a case-by-case basis. Contact <a href="mailto:standard\_support@globalgap.org">standard\_support@globalgap.org</a>. Resource constraints are not a valid reason to grant an exception to this rule.
- 1.23 GLOBALG.A.P. Remote may be used for unannounced inspections for compliance with the 10% unannounced inspections and 10% unannounced QMS audits.



#### 2 <u>RULES FOR PLANNING AND SCHEDULING OF GLOBALG.A.P. REMOTE (USING ICT,</u> <u>BASED ON IAF ID 12:2015 AND IAF MD 4:2018)</u>

- 2.1 Security and confidentiality
  - 2.1.1 The use of ICT for inspection purposes shall be mutually agreed upon by the auditee and the CB performing the inspection in accordance with information security and data protection measures and regulations before ICT is used. Video and/or audio recording, screenshots, and storage of evidence shall also be mutually agreed. The CB shall keep records of the agreement.
  - 2.1.2 In case of no agreement or non-fulfilment of this information, security and data protection measures, and the use of ICT for inspection, GLOBALG.A.P. Remote cannot be performed.
- 2.2 Planning and scheduling of GLOBALG.A.P. Remote
  - 2.2.1 The feasibility of the inspection should be determined to provide confidence that the inspection objectives can be achieved. This should take into consideration factors such as:
    - a) Sufficient and appropriate information for planning and conducting the inspection
    - b) Adequate cooperation from the producer
    - c) Adequate time and resources for conducting the inspection

For guidance see Annex II.

- 2.2.2 The CB shall define eligibility criteria for determining when it is appropriate to perform an inspection remotely (refer to 1.5), such as:
  - a) The acceptable period for performing a remote inspection
  - b) The producer's ability to designate one or more representatives or contact persons who are capable of communicating in the same language as the inspector and using the agreed platform
  - c) The CB's capability and aptitude to conduct the remote inspection in the chosen medium/forum of the remote inspection
  - d) The availability of a list of activities, areas, information, and personnel to be involved in the remote inspection

For guidance see Annex II.

- 2.3 Planning of technology and equipment
  - 2.3.1 Before the remote inspection takes place, the CB shall:
    - a) Determine the platform (e.g., virtual meeting app, wearable technology, telephone/video call, messaging app, drones, or other platforms, etc.) for hosting the inspection. This platform needs to be agreed upon between the CB and the producer.
    - b) Explain to the producer which documents, activities, facilities are expected to be inspected via video streaming (real time) and which will be evaluated based on records/recorded information, and additionally, if applicable, which people need to be interviewed.
    - c) Test the ICT platform compatibility between the CB and the producer prior to inspection. A trial meeting using the same media platforms agreed upon shall be conducted to ensure the scheduled inspection can be performed as planned.
    - d) Encourage and consider the use of webcams, cameras, etc. when physical evaluation of an event is desired or necessary.



- e) If the remote inspection is impossible due to technical restraints, (e.g., no phone or internet connection on the farm, etc.) GLOBALG.A.P. Remote cannot be used as option for inspection.
- 2.4 Performing the remote inspection
  - 2.4.1 The remote inspection shall be facilitated in quiet environments whenever possible to avoid interference and background noise (e.g., through speakerphones).
  - 2.4.2 Both parties shall make their best effort to confirm what was heard, stated, and read throughout the inspection.
  - 2.4.3 All remote inspections shall be concluded in the same way as the on-site inspections according to the general regulations (e.g., closing meeting, clarification of findings, non-conformances, etc.).
  - 2.4.4 The start time, the end time, and the participants of the remote inspection shall be recorded. Evidence of opening and closing meetings shall be kept even if there were multiple sessions. Electronic acknowledgement of receipt is equivalent to "signature", as indicated in the general regulations Part III, 6.1 e). This applies for all standards and add-ons.
  - 2.4.5 The time frame for follow-up actions (closure of non-compliances) begins with the end of the remote inspection, i.e., the closing meeting when the findings are communicated.
  - 2.4.6 The fact that the inspection was conducted remotely, as well as the software and any technical problems during the inspection, shall be noted in the inspection report.
  - 2.4.7 If it is not possible to maintain satisfactory connections or conditions during the scheduled time of the remote inspection, the CB inspector may terminate the inspection before the scheduled time. This shall be recorded in the inspection report.
  - 2.4.8 The inspection may continue later only if the CB and the producer both agree on this. The continuation of the remote inspection shall follow the planning as described above. This shall be confirmed during the opening meeting.

# 3 RULES FOR CONDUCTING GLOBALG.A.P. REMOTE (BASED ON IAF MD 4:2018)

- 3.1 The inspector shall be aware of the ICT's risks and opportunities and the impacts that they may have on the credibility and objectivity of the information gathered. It is the responsibility of the CB to train the inspector accordingly, including on the contents of the GLOBALG.A.P. Remote procedure and GLOBALG.A.P. training material, when available. No additional sign-off on the part of GLOBALG.A.P. is necessary.
- 3.2 The means (tools) of verifications that may be used for the virtual meeting part of GLOBALG.A.P. Remote are:
  - a) Interview with the auditee. Worker interviews may be conducted by phone or video call interviews. For GRASP this may be used for all needed interviews.
  - b) Video call in which the auditee shows records.
  - c) Video call in which the auditee streams video of the site/facility to the inspector. However, all the observed evidence shall be recorded in the checklist. Video streaming of the site/facility may be done by the producer or by an assigned person the CB chooses, who need not necessarily be an inspector.
  - d) Sending pictures/videos instantly during the interviews. The files shall include information on the time and geo-reference for the location, or this information shall be available by other means.
- 3.3 The inspection report shall contain details about the different means (tools) used during the remote inspection in order to demonstrate the proper implementation of this procedure.



- 3.4 The CB shall inform the producer when, how, why, and of what to make recordings, pictures, or video footage and which will be saved as evidence, why, and for how long will they be stored. The producer shall agree and, if applicable, give consent and send/submit/transmit the evidence to the CB within the agreed timeframe.
- 3.5 The following guidelines apply and are mandatory when inspecting different requirements. For the IFA standard for Fruit and Vegetables, the use of the Inspection Guideline and Methodology is mandatory. For GRASP, the use of the GRASP Remote Assessment Guideline Checklist (available at <a href="https://www.globalgap.org/uk">https://www.globalgap.org/uk</a> en/documents/) is mandatory.
  - 3.5.1 The following 5 inspection methods shall be used:
    - 3.5.1.1 V Visual assessment
    - 3.5.1.2 I Interview with personnel
    - 3.5.1.3 D Records or document review
    - 3.5.1.4 X Cross-checking data and information, verifying data, linking records with each other and confirming their accuracy
    - 3.5.1.5 C Challenging the content and plausibility of the information (e.g., when checking the risk assessments)
  - 3.5.2 CPCC and add-on-specific points requiring V Visual assessment. Remote inspection shall include live video streaming (telephone camera, tablet camera, etc.).

If online video streaming is not possible, pictures (with indicated date and time) or videos (traceable to the time and date of the video shooting) may be acceptable. Those offline visuals shall be taken at the date of the remote inspection and at the request of the inspector. Inspection report shall contain detailed justification/comments what was shown and how it was shown. The inspector is obliged to challenge critical areas in order to obtain as much as possible visual information to justify compliance with the checked control points.

- 3.5.3 CPCC and add-on-specific points requiring I Interview. Before the interview can begin, the inspector and the auditee shall confirm their identity. The best way is to perform the interview via an audio and video communication channel, which will establish the identity of the producer and the person interviewed and their knowledge (for example, familiarization with procedures and rules and not reading a text to answer the questions). If possible, telephone calls without video shall be avoided. During interviews, the auditee shall ensure a quiet environment. If workers on the farm are interviewed and those workers do not speak the language of the inspector (e.g., seasonal foreign workers, GRASP assessments), translations shall be ensured by a representative of the auditee to the inspector in the same way as is usually done during on-site inspections.
- 3.5.4 CPCC and add-on-specific points requiring D Records or document check. Documents and records may be checked during the document review and/or the virtual meeting parts. The check can include emailing photos or scans, sending copies by e-mail, and/or faxing. As currently stated in the general regulations, the off-site inspection "... consists of a desk review of documentation sent by the producer to the CB before the inspection, including the self-assessment, risk assessments, procedures required in several CPCC, veterinary health plan (where applicable), analysis program (frequency, parameters, locations), analysis reports, licenses, list of medicines used, list of plant protection products used, proof of lab accreditation, certificates or inspection reports of subcontracted activities, plant protection products/fertilizers/medicines application records, etc." It may also include: harvesting records, mass balance records, training records with latest amendments related to COVID-19, calibration records, documentary proof of PPE; allowance for medical checks (not the results), stock list for both plant protection products and fertilizer, cleaning records for toilets, PPPL, GRASP Declaration, complaint procedures, working contracts, etc.



During the virtual meeting: sampling of other records/documents shall be made available in real time, the records shall be sent immediately by e-mail, photo, etc. This applies also to those records which were already inspected during the document review. The CB shall take all possible measures to mitigate the risk of receiving fraudulent records during the inspection.

- 3.5.5 CPCC and add-on-specific points requiring X Cross-checking data and information, verifying data, linking records with each other and confirming their accuracy. The remote inspection shall provide means to cross-check data and information in real time or with a minimal delay (if sending the information is required for the review by the inspector). A blended approach with audio/video or only audio is possible, provided that the requested documents are sent without delay, which will eliminate the risk that documents (or records) are corrected based on the inspector questions. Screen sharing may be a good option. The goal is to ensure that the information is consistent.
- 3.5.6 CPCC and add-on-specific points requiring C Challenging the content of the information. The content of the information (instructions, procedures, risk assessments) can be checked during the document review or during the virtual meeting. The goal is to ensure that the information is plausible.

# 4 PROCEDURE GLOBALG.A.P. REMOTE FOR HIGH-RISK CLASSIFICATION

- 4.1 Initial applications/certifications are considered high-risk for GLOBALG.A.P. Remote according to risk classification and shall require special attention, vigilance, and integrity from all involved CBs.
- 4.2 During the registration process, the CB shall pay specific attention to addressing the provisions of 1.4.
- 4.3 Follow-up on-site inspection
  - 4.3.1 The CB shall perform a follow-up on-site inspection of 100% of the high-risk producers during the validity of the certificate. In the case of new producers, the follow-up on-site inspection shall be performed within 6 weeks after the travel restrictions are lifted.
  - 4.3.2 This may be an announced or an unannounced inspection.
  - 4.3.3 For all follow-up on-site inspections, the full checklist shall be completed. The CB may (re-) use certain checklist data from the previous remote inspection with the objective of focusing on and auditing those points requiring on-site and/or visual inspection and/or interview. This may reduce inspection duration on-site.
  - 4.3.4 Unannounced follow-up on-site inspections may be counted towards the 10% unannounced inspections.
  - 4.3.5 It is likely that the harvest and/or the handling period is already over during the inspection, but some relevant agronomic activities shall be ongoing on the farm when the follow-up onsite inspection takes place.
  - 4.3.6 The information already verified during the remote inspection may also be used for the followup on-site inspection.
  - 4.3.7 If no travel restrictions apply and the follow-up on-site inspection has not been performed within the deadlines defined in 4.3.1, the certificate shall be suspended and cancelled. (Producers that have received a cancellation shall not be accepted for GLOBALG.A.P. certification within 12 months of the date of cancellation).
  - 4.3.8 A successful follow-up on-site inspection will allow the remote attribute on the certificate to be removed.
  - 4.3.9 Certificates issued to producers classified as high-risk may be extended as per the currently valid certificate extension rules to allow the CB to conduct the follow-up on-site inspection.



4.4 Initial certifications based on GLOBALG.A.P. Remote shall not be considered accredited certificates until the follow-up on-site inspection has been completed, in the standards where accreditation is applicable. Where the scheme itself is accredited, the certificate for initial inspection based on GLOBALG.A.P. Remote shall not display the accreditation body logo. Once the follow-up on-site inspection is successfully completed, a new certificate may be issued with the accreditation body logo.

#### 5 PROCEDURE GLOBALG.A.P. REMOTE FOR MEDIUM-RISK CLASSIFICATION

- 5.1 If the certificate has already been extended, GLOBALG.A.P. will process transfer requests coming only from the outgoing CB which extended the certificate validity. The transfer shall be finalized only when the incoming CB has completed the remote inspection and the outgoing CB explicitly asks for the termination of the extension and authorizes GLOBALG.A.P. to transfer the producer to the new CB.
- 5.2 The CB shall perform follow-up on-site inspections of 5% of the total number of the medium-risk producers during the validity of the certificate. The 5% are calculated per certificate holder and not per standard or add-on. The 5% shall be rounded up to the nearest whole number. The CB shall conduct at least 1 follow-up on-site inspection of a producer classified as medium-risk. The successful on-site inspection will allow the remote attribute on the certificate to be removed.
- 5.3 Follow-up on-site inspection may be announced or unannounced.
- 5.4 For all follow-up on-site inspections, the full checklist shall be completed. The CB may (re-)use certain checklist data from the previous remote inspection with the objective of focusing on and auditing those points requiring on-site and/or visual inspection and/or interview. This may reduce inspection duration on-site.
- 5.5 Unannounced follow-up on-site inspections may be counted towards the 10% unannounced inspections. Producers who have not received follow-up on-site inspections have the right to ask for on-site inspection, whenever the conditions allow. A successful on-site inspection will allow the remote attribute on the certificate to be removed. The producer acknowledges that this may result in additional certification costs.

# 6 PROCEDURE GLOBALG.A.P. REMOTE FOR LOW-RISK CLASSIFICATION

- 6.1 The producer has the right to ask for an on-site inspection, whenever the conditions allow. A successful on-site inspection will allow the remote attribute on the certificate to be removed. The producer acknowledges that this may result in additional certification costs.
- 6.2 The CB is not required to perform follow-up on-site inspections during the validity of the certificate for producers with low-risk classification.

# 7 PROCEDURE GLOBALG.A.P. REMOTE FOR CERTIFICATE SCOPE EXTENSION

- 7.1 The "GLOBALG.A.P. Emergency Procedure for Certificate Extension due to the Coronavirus Pandemic" (26 March 2020) allows scope extension (adding a new crop) only if the new crop belongs to the same crop grouping (in terms of harvest and handling) as already certified. GLOBALG.A.P. Remote provides possibilities for scope extensions (adding new product(s)) to the existing certificates even if the new product(s) are not in the same crop grouping. If the producer is a holder of a valid certificate, is classified in an eligible risk rating (ref. 1.9.1), and requests scope extension for adding new product, GLOBALG.A.P. Remote can be used, following the rules described for low-risk classification. Additionally:
  - 7.1.1 Before product extension, a full checklist and report for this new product(s) shall be completed and uploaded.



- 7.1.2 The new product shall be added to the existing GLOBALG.A.P. certificate, indicating the remote attribute. The "valid to" date of the original certificate remains unchanged.
- 7.2 In the case of adding a new production site to an Option 1 producer (multi-site without QMS), the new site(s) shall be inspected remotely before adding them to the certificate.
- 7.3 If, on a certificate with QMS (option 1 or Option 2), more than 10% of producers/sites and/or area are added or changed (see general regulations Part II, 11 c) and d)), the square root of the new number of producers/sites shall be inspected remotely before adding them to the certificate.
- 7.4 If the producer refuses the remote inspection, the certificate's scope cannot be extended.
- 7.5 Changes in the scope of activity for Chain of Custody companies may result in a change of the overall risk classification of the producer (e.g., a low-risk trading company that starts labeling products becomes high-risk).

#### 8 ADDITIONAL CLARIFICATION FOR OPTION 2 AND OPTION 1 MULTISITE WITH QMS GLOBALG.A.P. REMOTE

- 8.1 The QMS announced inspection may be performed using GLOBALG.A.P. Remote. This may also include those procedures centrally managed by the QMS, but applicable at member level.
- 8.2 The rules described in GLOBALG.A.P. Remote for high-, medium-, and low-risk producers apply.
- 8.3 The sample size for the producer group members shall not be reduced as defined by the general regulations v5.2 Part I, 5.2.3 and Part III, 5.4.2. It remains the square root (or 50% of the square root) of the number of members.
- 8.4 At member level, the on-site inspection may be replaced by GLOBALG.A.P. Remote.
- 8.5 The surveillance inspection (of 50% of the square root of the number of sites/producers) may also be performed remotely. The need for a follow-up on-site surveillance inspections depends on the certificate holder risk level (cf. chapters 4, 5, and 6).
- 8.6 If the re-certification QMS audit and the producer member inspections were performed remotely for high-risk certificate holder(s) (cf. chapter 4) and where the medium-risk certificate holder(s) (cf. chapter 5) were selected for a follow-up inspection, the follow-up on-site inspection and follow-up on-site QMS audit may be combined with the on-site surveillance inspection.
- 8.7 If no on-site follow-up inspections (in the case of medium- and low-risk classification cf. chapters 5 and 6) were done during the GLOBALG.A.P. Remote certificate validity, the re-certification audit shall include the full square root of the current number of the members/sites.
- 8.8 Internal inspections cannot be performed using GLOBALG.A.P. Remote.

#### 9 CIPRO AND GLOBALG.A.P. REMOTE

9.1 Correct implementation of this procedure will be checked in the framework of the GLOBALG.A.P. Certification Integrity Program. CIPRO assessors will closely monitor the incoming reports of remote inspections.



# ANNEX I. APPLICABLE ADD-ONS FOR GLOBALG.A.P. REMOTE

The following add-ons can be inspected using GLOBALG.A.P. Remote.

Add-on name	Database Scheme-ID
AH-DLL GROW v3.0	284
Albert Heijn Protocol for Residues Version 2	109
Food Safety Modernization Act Produce Safety Rule Add-on Version 1.1	258
Food Safety Modernization Act Produce Safety Rule Add-on Version 1.2	267
GLOBALG.A.P. Farm Sustainability Assessment (GG FSA) 2.1	225
GLOBALG.A.P. NON-GM/Ohne Gentechnik Add-on Version 1.0	240
GLOBALG.A.P. Risk Assessment on Social Practice (GRASP) v1.3_July15	180
Nurture Module Version 11.2	250
Sustainable Program for Irrigation and Groundwater Use (SPRING) Add-on Version 1.1	191
Sustainable Meat Initiative for Dutch CBL V1.0 Modules 1, 2, and 3	140
TR 4 Biosecurity Add-on for Bananas v1.0	206



#### ANNEX II. FEASIBILITY AND RISK ANALYSIS FOR REMOTE AUDITS

This annex provides a generic identification of potential risks and opportunities (R&O) by type of communication technology and it can be used as starting point to the determination of R&O for the decisionmaking process. In any case the determination should be made or revised for each situation. It is also important to remember that the intent is not to design a complex, formal, and quantified approach to risk and opportunity determination. The intent is to have the ability to identify the opportunities and the risks, and to determine if the risks can be mitigated or accepted and in order to take a substantiated decision whether to proceed with the application of remote methods or not.

When analyzing feasibility, the digital quality of the data to be reviewed should also be considered. This is more relevant when the organization still retains information on paper that needs to be scanned for remote review.

1	Confidentiality, Security and Data Protection (CSDP)					
Ensure agreement between auditor and auditee about CSDP issues.						
	Document any arrangements to ensure them.					
2	2 Use of ICT					
	There is a stable connection with good online connection quality. The ICT allows access to relevant documented information including software, databases, records, etc. It is possible to make the authentication/identification of interviewed people preferably with image.					
	If observation of facilities, processes, activities, etc., is relevant to achieve audit objectives, it is possible to access them by video.					
3	People in the organization					
	It is possible to access and interview people relevant for the QMS.					
4	Operations					
	If the organization is not operating regularly due to contingency situations, the processes/activities being performed are representative and allow fulfilment of the audit objectives.					
5	Complexity of the organization and Audit Type					
	In case of complex organizations, processes, or products and services and where the objectives of the audit type require full assessment of the standard and wider sampling (e.g., initial assessment or reassessment) a careful analysis of feasibility of remote audits to fully evaluate the organization conformity to all requirements should be performed.					
6	Conclusions					
	The audit objectives can be attained with the remote audit – proceed to remote audit.					
	The audit objectives can be achieved partially – a remote audit may be done partially and later complemented with an on-site audit.					
	The audit objectives cannot be attained via remote audit.					
7	Validate risk analysis with audit program manager					

Source: ISO 9001 Auditing Practices Group Guidance on: REMOTE AUDITS by ISO & IAF 2020 Edition 1., Date: 2020-04-16.



# **EDITION UPDATE REGISTER**

New document	Replaced document	Date of publication	Description of Modifications
	200515_GLOBALG.A.P	5 June 2020	1.9.1 Minor wording change
Remote_interim- final_v1.1_en	Remote_interim-final_en		1.9.3 Additional requirement for medium- risk category added
			3.5 Added reference to obligatory GRASP Remote guideline
			4.3.1, 4.3.5, 4.3.7 Added requirement for the timing of follow-up on-site inspections to high-risk producers
			Annex I Albert Heijn Protocol for Residues Version 2 added
201022_GLOBALG.A.P Remote_interim-	200605_GLOBALG.A.P Remote interim-	22.10.2020	Summary, Point 4 Clarification on applicable standards
final_v1.2_en	final_v1.1_en		1.1 Official gathering restrictions also accepted
			1.9.1 New way to calculate eligibility of producers
			1.9.3 Additional type of producers added to the category
			1.10.1 & 1.10.3 Upload timing requirement updated
			1.15 and 1.20 Limitation on exceptions added
			New point 1.18 Procedure for remote witnessing and sign-off of inspectors added
			1.19 Wording adapted because of new point 1.18
			1.21 GLOBALG.A.P. Remote now may be used for unannounced inspections
			2.2 Reference to Annex II added
			4.3.3 & 5.4 Included checklist use guidance on follow-up on-site inspections
			Annex I AH-DLL GROW v3.0 add-on added
			New Annex II added
210401_GLOBALG.A.P Remote_interim- final_v1.3_en	201022_GLOBALG.A.P Remote_interim- final_v1.2_en		Summary, Point 4 Included CBL Chain of Custody standard
			1.9.1 Minor wording changes and included rules for risk classification when re- certifying producers previously certified with GLOBALG.A.P. Remote
			1.9.2 Included rules for risk classification when re-certifying producers previously certified with GLOBALG.A.P. Remote and clarification on GRASP risk classification
			1.9.3 Included rules for risk classification when re-certifying producers previously certified with GLOBALG.A.P. Remote and clarification on GRASP risk classification
			1.9.6 Included applicability of GRASP general rules Annex VI

210401\_GLOBALG.A.P.\_Remote\_interim-final\_v1\_3\_final\_en



1.10.1 Nurture Module checklist upload now required in AOH
1.10.2 Nurture Module checklist upload no longer possible in the database
1.18 GLOBALG.A.P. Remote may now be used for observing inspections by inspectors in training
1.19 Added requirement for upload of checklists of witness and observation inspections
4.3.9 Added clarification for extensions of certificates
5.2 Added clarification for minimal requirement of follow-up on-site inspections
Annex I. Added SMI CBL add-on