

GLOBALG.A.P. Risk Assessment on Social Practice (GRASP)

General Rules

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1 APPLICATION OF GRASP GENERAL RULES AND GLOBALG.A.P. GENERAL REGULATIONS

This document describes specific rules applying to the GRASP add-on. These rules shall be applied within the parameters and in addition to the GLOBALG.A.P. general regulations. Therefore, for all requirements that are not described in this document, the valid version of the GLOBALG.A.P. general regulations and the GLOBALG.A.P. general add-on rules shall apply. At all times, the GLOBALG.A.P. general regulations shall be understood and applied with a view to protecting the integrity, nature, and good application of the GRASP assessment. The GLOBALG.A.P. general regulations shall therefore be applied to these rules accordingly, interpreting the wording in line with the nature and subjects of GRASP. If there is a conflict between the GLOBALG.A.P. general regulations and this document, the rule that allows a better safeguarding of the GRASP assessment's integrity shall be applied.

GRASP principles and criteria (P&Cs) are voluntary requirements. Compliance with them is not covered under GLOBALG.A.P. Integrated Farm Assurance (IFA) certification.

2 GRASP NORMATIVE DOCUMENTS

Normative documents for GRASP are the latest GLOBALG.A.P. general regulations, the GLOBALG.A.P. general add-on rules, and any document defined by the GLOBALG.A.P. Secretariat as a normative document for GRASP.

The current list of GRASP normative and supporting documents can always be found on the GLOBALG.A.P. website.

3 GRASP APPLICATION OPTIONS

GRASP is applicable to a corresponding scope of IFA or a benchmarked scheme/AMC that is equivalent in terms of product and production sites. It shall follow the processes and rules described in the GLOBALG.A.P. general regulations and the normative documents.

GRASP shall be applied only to a producer with a valid certification according to a GLOBALG.A.P. primary production standard or an equivalent benchmarked scheme/AMC. A list of valid certification options can be found on the GLOBALG.A.P. website.

In addition, for any GRASP application, evidence shall be submitted of the verification of criteria on workers' health, safety, and welfare. A full compliance result in this category is required to obtain the letter of conformance.

GRASP is not applicable if the producer did not employ any type of labor during the certification cycle or year before the assessment. However:

- GRASP is applicable to family farms without hired labor during the certification cycle or year before the assessment. If the family farm achieves the required level of conformance and evidence on workers' health, safety, and welfare criteria with full compliance, a letter of conformance will be issued.
 - Family farms shall be assessed on lack of hired labor and selected P&Cs from the GRASP checklist.
- Non-labor-employing sites of multisite producers (Options 1 and 3 – Multisite with QMS) as well as producer group members (Options 2 and 4 – Group certification) will be considered in the internal and external GRASP QMS audits and visited by the auditor to assess on the lack of hired labor. These producers shall also provide evidence on workers' health, safety, and welfare criteria with full compliance.

3.1 GRASP application to product handling unit (PHU)

It is not possible to assess only PHUs or the producer group’s own production sites. GRASP is applicable to PHUs only if product handling is included in the scope of GLOBALG.A.P. or equivalent benchmarked scheme certification.

In such a case, the PHU(s) and/or the producer group’s own production site(s) shall be included as another member/site in the GRASP assessment and shall be assessed in addition to the producer group members/production sites. PHUs shall also provide evidence on workers’ well-being criteria with a full compliance. The “GLOBALG.A.P. general regulations – Rules for producer groups and multisite producers with QMS” shall apply.

3.2 GRASP application to labor subcontractors, other subcontractors, and visitors

GRASP is applicable to any subcontractor that provides farm labor (including farm labor and equipment, farm labor and material, or some combination of farm labor, material, and equipment) for the main farming activities of agricultural production on the premises of the PHU or production site. These workers/types of farm labor shall be included in the GRASP assessment. The phrase “main farming activities” refers to those activities directly related to the production of the product (e.g., including pruning of the fruit trees, but excluding construction of a farm barn).

During the registration with the CB, the producer shall inform the CB about the subcontracted labor activities. The producer shall ensure that the labor subcontractor or employment agency follows the GRASP requirements.

Other subcontractors may not be included in the GRASP assessment unless the auditor detects the risk of a GRASP integrity issue.

For visitors/outsourced activities that require the presence of staff of the subcontractor at the farm, the CB shall check that the producer, during subcontractors’ staff presence on the farm, has communicated a zero-tolerance policy with regards to non-compliances with human rights and local laws (GRASP human rights policy).

4 INDIVIDUAL PRODUCER AND PRODUCER GROUP REQUIREMENTS

Any GRASP applicant shall follow the GLOBALG.A.P. general regulations on individual and producer group requirements.

5 GRASP REGISTRATION PROCESS

Any GRASP registration topic shall follow the GLOBALG.A.P. general regulations and the GLOBALG.A.P. general add-on rules. The following GRASP-specific rules shall also apply:

	Permitted	Prohibited
Registering the same product with more than one CB		x
Registering the same product under more than one Option (as individual producer and producer group member)		x
Registering production sites in different countries (exceptions granted by the GLOBALG.A.P. Secretariat only on a case-by-case basis)		x

The applicant shall register for GRASP with the same CB as for the primary production standard.

The applicant shall include information on the number of workers during the year prior to registration and on the type of workers hired (permanent, seasonal, etc.) during the previous assessment period by gender.

The applicant shall indicate whether subcontracted labor was hired and if so, the number of workers under this condition during the year prior to registration.

The applicant shall indicate whether the farm is run as family farm (run as core family business) and indicate the number of family members working and the family relation of the group.

Applicants with a QMS shall indicate the total number of producer group members/production sites and how many of these are with workers and without workers.

5.1 Registration of a CB for the GRASP add-on

- a) In cases where a GLOBALG.A.P. finally approved CB uses auditors who are *already qualified* for GLOBALG.A.P. primary production audits, those auditors will be authorized to carry out GRASP assessments if they comply with the additional qualification requirements indicated in this document. A list of GRASP assessors for the GRASP add-on shall be registered in the GLOBALG.A.P. IT systems.
- b) Approved CBs may use auditors who are not qualified for GLOBALG.A.P. primary production audits, but are certified social auditors, to accompany GLOBALG.A.P. auditors during GRASP assessments. These social auditors shall comply with the formal skills indicated in this document.

5.2 CB approval process

As a condition for CB approval, the applicant CB shall have at least one approved GRASP auditor (to perform the audits) and one approved GRASP auditor (for the CB decision-making committee) who have both completed all applicable qualification requirements. The CB shall nominate an in-house trainer (IHT) and complete or at least register for the GRASP IHT training.

Approval shall be granted if all of the following apply:

- a) A staff member has attended the GRASP in-house training of the approved CB IHT and has passed the GRASP test when available.
- b) A staff member approved as a CB IHT has attended the GRASP IHT training and passed the GRASP IHT test when available.
- c) The CB is accredited for any scope within the GLOBALG.A.P. primary production standards.

5.3 Special registration of assessors in countries without a NIG

CBs assessing GRASP in countries with no national interpretation guideline (NIG) shall undergo a special registration process.

The CB may apply for special registration in countries where no NIG exists by filling in the online application form on the GLOBALG.A.P. website or contacting the GLOBALG.A.P. Secretariat.

Requirements for conducting a GRASP assessment in a no-NIG country:

The assessor shall demonstrate that their qualifications and technical skills refer to the country where the assessment will be conducted as indicated in this document.

- The CB shall provide a draft document of the GRASP NIGs, including explanation of how GRASP requirements correspond to local legislation. This document shall be reviewed and approved by the IHT.

- This document shall be submitted together with the application for GRASP assessments in a no-NIG country.

For information on the process of how to contribute to a NIG, please see the GRASP normative and supporting documents “Guideline for the development of GRASP NIGs and assessments in no-NIG countries” on the GLOBALG.A.P. website.

6 AUDIT PROCESS

In addition to the latest GLOBALG.A.P. general regulations and the GLOBALG.A.P. general add-on rules, the following GRASP-specific rules and instructions provided in the supporting documents applicable to GRASP shall apply (a list of these documents can be found on the GLOBALG.A.P. website):

6.1 Self-assessments/Internal farm audits

- For all producers, the GRASP self-assessment, or internal farm audit respectively as indicated in the GLOBALG.A.P. general regulations, is obligatory. The self-assessment/internal farm audit includes PHUs. In both cases, verification of full compliance with criteria on workers’ health, safety, and welfare shall be included in the report.
- The self-assessment or internal farm audit must each be carried out as indicated in the GLOBALG.A.P. general regulations.
- To ensure that all P&Cs have been properly audited for all applicable sites/producers, the self-assessment/internal farm audit shall be conducted during a time when the number of workers present is representative of the labor hired during the year/production cycle (especially subcontracted and seasonal labor) and agricultural activities are taking place (e.g., during peak season or harvesting), as indicated in the GLOBALG.A.P. general regulations.
- The country risk level shall be checked and shall be adhered to in order to determine the required methods of evidence to be used in the internal farm audit. Interviews (where applicable) shall be conducted and cross-checked through document review. Information on this matter shall be included in the summary reports. This rule does not apply to self-assessments under Option 1 and Option 1 multisite without QMS.
- For every P&C assessed in all GRASP self-assessments/internal farm audits, remarks and comments shall be given in all non-compliant Major Must and Minor Must P&C. The summary reports shall provide objective evidence (e.g., interviews where applicable) and information on how the producer complies with the GRASP requirements, and shall list any non-compliances and/or non-conformances identified. Comments and evidence, such as which document(s) were sampled, which workers were interviewed, etc., shall be site- and product-specific and included in the checklist to ensure that all the P&Cs have been properly audited for all applicable production sites and products.

6.2 Third-party assessments

- GRASP requires a third-party assessment conducted by an independent, finally approved CB. This third-party assessment shall be carried out by auditors who meet the requirements as defined in the GLOBALG.A.P. general regulations and in this document.
- The GRASP assessment shall be conducted together with the GLOBALG.A.P. primary production audit and the CB QMS audit.
- The GRASP assessment shall be carried out by the same CB conducting the GLOBALG.A.P. primary production audit and the CB QMS audit.

- d) The GRASP assessment may be carried out, but a letter of conformance shall be provided after verification of the producer's full compliance with the P&Cs relating to workers' health, safety, and welfare.
- e) The auditor shall use the GRASP checklist for Option 1, Option 2, and family farms, accordingly. All are available in the GLOBALG.A.P. IT systems.
- f) Before conducting the assessment, the auditor shall check the country risk level and determine the required methods of evidence. In addition, the auditor shall check and register (by employment, migratory status, and gender) the number of workers present at the farm visited on the day of assessment. The auditor shall apply the correct sample sizes for document review and where applicable the sample size for interviews. The rules can be found in the normative documents on the GLOBALG.A.P. website.
- g) Due to the social nature of GRASP, remarks and comments shall be given in all cases (Yes/No) for every P&C assessed in all external assessments. Remarks and comments (e.g., which document was/which documents were sampled) shall be site-specific and included in the checklist, showing that all the P&Cs have been properly assessed. Responsibility for a lack of included remarks rests with the CB.
- h) A full written summary of the assessment activity undertaken shall be given by the CB. This shall provide objective evidence and information on how the producer complies with the GRASP requirements, and, where applicable, shall list any non-compliances and/or non-conformances identified. Comments and evidence, such as which document(s) were sampled, which workers were interviewed, etc., shall be site- and product-specific and included in the checklist to ensure that all the P&Cs have been properly audited for all applicable production sites, PHUs and products.
- i) In the Audit Online Hub, "Company description" shall contain qualitative information about the company (i.e., the organizational structure; location of the production sites, PHU(s), and (head/human resource) office; and, if applicable, the different seasons of activities or intervals of hiring labor/fluctuation, etc.).
- j) During the external GRASP QMS audit, the IFA QMS checklist shall be used. Comments on GRASP compliance (Yes/No) shall always be included for each applicable P&C. If a P&C is considered not applicable to GRASP, complete reasoning for the inapplicability shall be included. Responsibility for a lack of reasoning rests with the CB.
- k) Names and personal data of responsible persons or other workers shall not be entered in any remark or comment of the GRASP checklist. Instead, initials/other abbreviations shall be used. Alternatively, the position of the worker or internal codes/numbers assigned by the producer/company may be used.
- l) Other personal data of workers (e.g., contract, time records, paychecks) must be accessible to the auditor and must be provided by the employer. To ensure proper provision of data and transparency, a document for the protection of personal data has been drawn up that can be used by the employers. If needed and demanded by the workers, the employer shall forward this to them.
- m) In countries where a GRASP NIG exist, the CB shall use it applying the rule that provides more protection to the workers. If GRASP provides more protection, then it overrides the local law, and in case the local law provides more protection, it will override the GRASP P&Cs. A regulation in the NIG cannot provide compliance without verification. Omission of a topic in the NIG shall be always corrected applying the GRASP P&Cs. However, inclusion of a topic in the NIG, does not allow for a modification or change of the GRASP P&Cs.

6.2.1 Assessment procedure for labor subcontractors

- a) The CB assesses the subcontracted labor compliance with GRASP P&Cs as part of the producer's responsibility and duty of care during the GRASP assessment of the producer.
- b) The producer is responsible for providing the CB with evidence of labor subcontractors GRASP compliance. If the CB is not able to verify compliance due to a lack of necessary evidence of the subcontractor (e.g., lack of documents or no access to evidence), a non-conformance shall be raised for the respective P&C.
- c) The CB can choose to visit an office/production site at the labor subcontractor's premises. Labor subcontractors shall agree (in their commercial agreement with the producer) that GLOBALG.A.P. finally approved CBs are allowed to verify GRASP assessments through a physical CB audit where there is doubt. Inclusion of this clause is the responsibility of the producer.
- d) Any non-compliance raised during the assessment of the subcontracted labor activities shall be recorded as non-compliance of the producer. These non-compliances are subject to corrective actions following the GLOBALG.A.P. general regulations. The producer shall provide evidence to the auditor that the non-compliance was corrected. If corrections were not implemented by the subcontractor, the producer shall have evidence that a warning has been issued and/or termination of the commercial relationship after lack of response by the subcontractor has occurred.
- e) The CB shall raise an additional non-compliance in the criteria related to the self-assessment/internal QMS audit if the internal QMS audit or self-assessment recorded the subcontractor's non-compliance and no correction was sought. Seeking correction is defined as a written request for correction. The producer is also considered non-compliant if the requested corrections were not followed up on until receiving proof of correction.
- f) If the labor subcontractor holds a valid, official, and current proof of social auditing/compliance for the same scope under GLOBALG.A.P. certification (including GRASP P&Cs and IFA P&Cs on workers' health, safety, and welfare), the assessor may consider the labor subcontractor's compliance to be verified. The proof shall be the same service they provide to the producer. The subcontractor's proof of auditing/compliance can be provided at group level with verification, at each producer group member included in the external assessment, or as part of the commercial contract signed by the producer group.
- g) In all cases of subcontracted labor assessments, the assessor shall include the remarks in each P&C (yes/no) of the checklist.

6.2.2 Duty of communication to subcontractors or other visitors in the farm.

- a) Visitors and subcontractors other than labor subcontractors are not under the scope of GRASP and they shall not be assessed.
- b) The producer is responsible for communicating to visitors and visiting subcontractors that enter the premises of the producer registered for GRASP that there is no tolerance of non-compliances related to the producer's human rights policy.
- c) The producer shall present evidence to the CB of both of the following points:
 - i. The producer has communicated to any visitor and subcontractors visiting about the producer's zero-tolerance policy regarding violations of human rights and local laws.
 - ii. If violations were detected at the farm, the producer has requested an immediate end of the activity on the premises of the producer.

- d) Lack of evidence of communication or of the request to immediately stop the activity shall be raised in the GRASP checklist as non-compliance with the duty to communicate the human rights policy to subcontractors.

6.2.3 Assessment under Option 1 individual producer without QMS

- a) The results/corrections of the self-assessments are verified during the external assessment. Internally, each production site shall be assessed.
- b) The CB shall follow the GLOBALG.A.P. general regulations for audit processes for initial and subsequent assessments. In order to facilitate worker interviews, the timing of the assessment shall take into account the availability of workers on the day of the assessment and the presence/accessibility of the worker representation on the day of the assessment. Only if workers are not present at all, shall the assessment be rescheduled.

	Initial and subsequent years
Producer self-assessment	1. Entire scope (all registered products, production sites, and PHUs as registered for IFA or equivalent standard) annually
CB Audit	1. Initial: entire scope (all registered products, production sites, and PHUs as registered for IFA or equivalent standard) – announced 2. Subsequent: entire scope (all registered products, production sites, and PHUs as registered for IFA or equivalent standard) annually – announced, but 10% chance of being unannounced

- c) Externally, the CB shall assess the GRASP checklist from a sample (square root of the total number) of the production sites and the central PHU following the sample rules of the GLOBALG.A.P. general regulations. The final GRASP report combines the results and the assessment notes for all visited production sites and the PHU, indicating any differing condition between the sites.
- d) Producer group members/production sites without workers included in the sample will be externally assessed to verify the lack of hired labor during the year/production cycle before the assessment and full compliance with P&Cs on workers' health, safety, and welfare. The CB shall conduct among other, interviews with the management, cross-check information on training for workers' health and safety, personal protective equipment, and other well-being aspects of the primary production certification checklist, consider the conditions of the farm, check official self-declarations of the producer, review production, and cross-check with harvest yield data of the IFA audit.

6.2.4 Assessment under Option 1 multisite with QMS and Option 2 group certification (producer group members, PHUs, and producer group's own production site)

- a) The results of the internal QMS audit shall be kept and summarized in the GRASP internal checklist for producer groups and Option 1 multisites with QMS.
- b) The annual external assessment carried out by a GRASP approved CB uses the IFA QMS checklist to determine how the QMS functions with respect to the GRASP P&Cs. It evaluates and checks the applicability of the QMS procedures and systems to the scope of GRASP (e.g., all producer group members/production sites have been internally assessed).

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- c) When the auditor assesses the level of the implementation of the GRASP QMS using the IFA QMS checklist, they shall copy the overall result into the QMS P&C in the GRASP P&Cs based on the internal audit results and the CB QMS audit. They shall also include the comments in the GRASP P&Cs. In addition, the assessor shall review whether the internal QMS audit was conducted and what its results were.
- d) All producer group members, production sites, and units with IFA certification shall be registered for GRASP and considered for the sampling in the GRASP assessment. When sampling producer group members, production sites, and PHUs, the CB assessment will follow the GLOBALG.A.P. general regulations. The sample shall always be the same as the one selected for the IFA audit.
- e) The CB does not assess all producers of a producer group for GRASP but samples the square root of the number of producers and follows the sample rules of the GLOBALG.A.P. general regulations, complemented by the rules of this document. It is not the responsibility of the CB to determine each producer's compliance (this responsibility rests with the applicant). The CB shall assess whether the applicant's internal controls are appropriate, and this is done during the CB QMS audit.
- f) In initial, surveillance, and subsequent assessments, the CB shall follow the GLOBALG.A.P. general regulations regarding audit processes (see table 2 for a summary). In order to facilitate worker interviews, the timing of the assessment (and the distribution between surveillance and recertification visits) shall take into account the availability of the workers and the presence/accessibility of worker representation at the producer group members' production site on the day of the assessment. If the resulting sample contains producer group members at whose production site neither labor nor worker representation is present, the following applies:
 - The auditor shall verify the reasons for the absence of the workers and the worker representation.
 - In the report indicating that those producer group members were not assessed according to GRASP, the auditor shall include the notes on their verification of the reasons for the workers' absence. Considering the best interest of the assessment continuation and integrity, the CB may use the visit to conduct document review (if low-risk country sampling rules apply).
 - The auditor shall verify whether P&Cs on workers' health, safety, and welfare were fully complied with, whether workers were present during the audit, and how the situation (of labor present) is different for the GRASP assessment. Notes and explanations on this verification shall be included in the report.
 - In the next closest assessment or surveillance/subsequent assessment, the CB shall include the producer group members with labor not present, requiring them to have workers present.

Table 2 Overview of audits in IFA v6 Smart

	Initial audit	Subsequent audit
Internally by the producer group/multisite producer with QMS		
Internal QMS audit	Complete QMS	Complete QMS

	Initial audit	Subsequent audit
Internal farm audit	Entire scope (all registered producer group members/production sites and PHUs as registered for IFA or equivalent standard)	Entire scope (all registered producer group members/production sites and PHUs as registered for IFA or equivalent standard)
Externally by the CB		
CB QMS audit	Certification audit Complete QMS + square root of the total number of registered central PHUs while in operation; before CB farm audits. (For aquaculture all the PHUs)	Recertification audit Complete QMS + square root of the total number of registered central PHUs while in operation; annually, before CB farm audits. (For aquaculture all the PHUs)
Unannounced CB QMS audit	-	Recertification audit Minimum of 10% of all producer groups/multisite producers with QMS
CB farm audits	Certification audit (Minimum) square root of the total number of registered producer group members/production sites	Recertification audit a) If non-conformances detected during previous CB surveillance audit: (minimum) square root of actual number of registered producer group members/production sites or b) If no non-conformances detected during previous CB surveillance audit: (minimum) square root of actual number of registered producer group members/production sites <i>minus</i> the number of producer group members/production sites audited during the previous CB surveillance audit
	CB surveillance audit during certificate validity (Minimum) 50% of the square root of the actual number of certified producer group members/production sites	CB surveillance audit during certificate validity (Minimum) 50% of the square root of the actual number of certified producer group members/production sites

- g) It is not possible to assess only the producer group's own production site. The producer group's own production site shall be counted as an additional producer group member in the sample of the Option 2 producer group member assessment.

Example: The number of producer group members with GRASP is 100, but the product that is supplied by the producer group members is cultivated by the group itself on its own field(s) as well. Thus, the number of producers that the CB assesses is the square root of 101, which is 11 and shall include the own field production.

- h) If they form part of a producer group, producers/production sites without workers and family farms without hired workers must also be included in the internal GRASP QMS audit of the group to ensure that GRASP QMS procedures are implemented.
- i) If, during the certification cycle, workers are hired by producers/production sites (including family-run businesses) that form part of a producer/producer group and normally do not hire workers, GRASP shall likewise be implemented and a new internal GRASP QMS audit and farm audit (including all the GRASP P&Cs) shall be performed. This GRASP QMS audit shall include verification of full compliance with P&Cs on workers' health, safety, and welfare. This shall be done during the time that workers are present.
- j) If, during a certification cycle, workers are hired by producers/production sites (including family farms) that form part of a producer/producer group and normally do not hire workers, the QMS manager shall point those producer group members/production sites out to the CB. Those producer group members/production sites shall then be included in the next closest external GRASP assessment.

- If this is not feasible or workers will not be present, then the GRASP assessment shall be conducted on that production site after the notification provided by the QMS manager of the producer group.
- If the specific GRASP assessment results in non-compliances that are not corrected, the CB shall immediately communicate this matter to the GLOBALG.A.P. Secretariat to modify the proof of assessment of the group.

- k) Producer group members/Production sites without workers shall form part of the external sample during GRASP assessments with QMS. The composition of the sample shall reflect the percentage of family farms and producer group members without workers in the producer group. A physical external assessment by the CB is required.

Example: A producer group has 100 members that register for GRASP. Of these members, 20 have no workers. The CB takes the square root sample of 10 producers; two producers must be without workers.

- l) Workerless producer group members/production sites included in the sample will be externally assessed to verify both the lack of hired labor during the year/production cycle before the assessment and their full compliance with P&Cs on workers' health and safety. Among other steps, the CB shall conduct interviews with the management; cross-check information on workers' health and safety training, personal protective equipment, and other well-being aspects of the primary production certification checklist; consider the conditions of the farm; check official self-employment declarations of the producer; and review production and cross-check documentation with harvest yield data of IFA audits.
- m) Family farms included in the sample shall be assessed on the above circumstances (lack of hired labor) and selected P&Cs from the GRASP checklist. The respective P&C shall be given a compliance level and comments (any yes/no) and cannot be marked "not applicable".
- n) If a producer/producer group requests to add new producer group members/production sites (without workers), during the 12 months of the assessment validity, the GLOBALG.A.P. general regulations on registration of additional producer group members/production sites to the certificate shall apply, along with the following rules:

- Before being added, the new producer group members/production sites shall demonstrate full compliance with P&Cs on workers' health, safety, and welfare.
 - The producer group shall conduct an internal GRASP audit of every new producer group member.
 - The CB shall ask for these new producer group members' internal assessments before adding the producer group members to the GRASP letter of conformance.
- o) If a producer/producer group requests to add new producer group members/production sites (family-run businesses or producer group members/production sites with workers) during the 12 months of the assessment validity, the GLOBALG.A.P. general regulations on registration of additional producer group members/production sites to the certificate shall apply, along with the following rules:

If the new producer group members/production sites added increase the total number of approved producer group members/production sites by up to 10% of the producer group members/production sites who are already GRASP assessed, the following applies:

- The producer group shall internally verify evidence of full compliance with IFA P&Cs on workers' health, safety, and welfare.
 - The producer group shall conduct an internal GRASP audit of these new producer group members before approving them.
 - The CB shall request the internal GRASP assessment of these members and the internal QMS P&Cs, including evidence of full compliance with IFA P&Cs on workers' health, safety, and welfare.
- p) If the new producer group members/production sites added increase the total number of approved producer group members/production sites by more than 10%, or if the production area increases by more than 10% due to the new members/site, the following applies.

The CB shall require evidence of the new members' full compliance with the IFA P&Cs on workers' health, safety, and welfare and follow the GLOBALG.A.P. general regulations for this situation.

- q) If the external assessment of the sample of producer group members/production sites or PHUs reveals major differences between the results of the internal and external assessments, this difference must be mentioned in the "Remarks/Comments" field of the GRASP checklist for each relevant P&C. The same applies to the internal QMS assessment and any corrective action taken before the external assessment. Major differences could indicate that there is a serious fault in the internal assessment results, and the assessor shall proceed as indicated in the GLOBALG.A.P. general regulations.
- r) Any non-compliances, no matter where they are found (field, PHU, or subcontractor), shall be recorded in the "Remarks" field of the GRASP checklist with reference to the production site, PHU, or labor subcontractor and to the corrective actions, if applied.
- s) The final GRASP assessment report shall include all findings and the final results for the entire producer/producer group/multisite producer and shall be presented during the closing meeting. The GRASP assessment report shall include the same information as described in the GLOBALG.A.P. general regulations. Where available, the CB shall use the assessment report template issued by the GLOBALG.A.P. IT systems.

6.3 Assessment procedure for subcontracted PHUs or other outsource service

In addition to the latest GLOBALG.A.P. general regulations and the GLOBALG.A.P. general add-on rules, the following GRASP-specific rules shall apply:

If one GLOBALG.A.P. approved CB has, in a production cycle, already performed a GRASP assessment on a subcontracted PHU/other outsource service under the scope of GRASP, another CB may accept the assessment result without reassessing the PHU/other outsourced service.

The second CB may accept a non-GLOBALG.A.P. audit/certificate of social compliance for a subcontracted PHU/other outsourced service if all of the following apply:

1. The subcontracted PHU/other outsourced service holds a valid proof of social auditing/certificate of social compliance.
2. The scope of the subcontracted PHU audit/certificate is the same scope as the GLOBALG.A.P. certification and GRASP.
3. The audit/certification includes the service of the subcontracted PHU/outsource activity provided to the producer who applied for GRASP.

7 GRASP ASSESSORS' QUALIFICATION REQUIREMENTS

In addition to the latest GLOBALG.A.P. general regulations and the GLOBALG.A.P. general add-on rules, the following GRASP-specific rules shall apply:

7.1 Formal qualifications

For any GRASP external assessments, the GLOBALG.A.P. IFA auditor qualification is required along with all the requirements below.

Qualification requirements for auditors performing self-assessments and internal audits follow the GLOBALG.A.P. general regulations on auditor qualifications and those included in this document.

7.2 Technical skills, training, and qualifications

- a) All assessors who are set to assess GRASP shall pass the GRASP test (when available) in the GLOBALG.A.P. IT systems.
- b) The IHT shall provide the required CB IHT training to all GRASP assessors.
- c) The IHT training shall include as social training topics: The GRASP P&Cs, the ILO conventions ratified in the country/countries in which the assessor will perform assessments (including development, issues, and legislative changes relevant to GRASP compliance in the country/countries in which the assessment shall be carried out), human rights concepts, and issues of forced labor and child labor in the countries in which the CB will perform GRASP assessments. Where a GRASP NIG is available, the relevant criteria and supporting regulations can follow what is outlined in the NIGs of the countries in which the CB performs GRASP assessments. (All shall be documented with agenda, list of participants, and certificates.) It is responsibility of the IHT to include in the training any information that may be missing in the NIG.
- d) The IHT training shall include interview and document review techniques applicable to the labor and social scope. These techniques shall reflect the customs and culture of the countries in which the CB will perform GRASP assessments.

- e) The training shall amount to (at least) a total of 12 effective hours (not less than 8 hours for social topics and 4 hours for interviews and document review). These hours can be reached by totaling several different trainings on the topics. Duration and content shall be indicated in the evidence provided for this requirement (course certificate(s), evidence of training(s) included in formal qualifications, etc.). This evidence shall be renewed every 3 years indicating any new courses and topics covered.
- f) If the assessor's personal qualification includes a formal qualification (academic degree) or the successful completion of a formal course (certified training by a third party, as per GLOBALG.A.P. general regulations), the IHT shall cover the missing topics and/or focus on the relevant changes and developments since the time when the assessor took the course or obtained the academic degree.
- g) All assessors shall have previous experience in assessments/audits in the country of application of GRASP, including similar criteria to the scope of GRASP and similar P&C on workers' health and safety and welfare as in IFA. This shall include at least: A minimum of two audits conducted, as auditor, in the country of application of GRASP (scheme or norm audited shall include similar criteria to the scope of GRASP and similar P&Cs on workers' well-being as in IFA).
- h) The assessor shall have "working language" skills in the corresponding native/working language that is used for trainings and work instructions to the workers in the country where the assessment will be conducted. This shall include locally used specialist terminology in the respective working language. The use of an interpreter may be approved to support the assessor's interviews with workers, but the interpreter shall be used for the interviews only, and the GLOBALG.A.P. Secretariat shall be notified of their use. The interpreter's qualification and requirements will follow the GLOBALG.A.P. general regulations.
- i) Assessment skills of the GRASP assessor shall also be verified through the following:
 - a. Witnessing one Option 1 individual producer or Option 2 producer group member and Option 2 GRASP QMS audit conducted by an authorized GRASP assessor (evidence shall be documented by the authorized GRASP assessor.)
 - b. Conducting the following assessment/audit witnessed by the IHT:
 The GRASP assessor shall assess at least one Option 1 individual producer or Option 2 producer group member and one Option 2 GRASP QMS audit and shall be witnessed during this assessment by the IHT. The witness assessment can also be conducted by an already approved GRASP assessor of the same CB appointed by the IHT. The IHT will be responsible and accountable for this decision.

 Both verifications (witnessing a GRASP assessment and conducting a witnessed assessment) can occur in a country different from the country where the assessment will be applied.
- j) A CB approved for GRASP may use a GLOBALG.A.P. auditor with some but not all of the skills required for GRASP if that auditor accompanies assessors who are not qualified for GLOBALG.A.P. primary production but are certified social auditors. The CB shall provide evidence on the social qualifications of the auditor(s) and of the points c), d), e), f), g), and h) above (accordingly even when not provided by the CB IHT). The CB is responsible for supporting the social auditor regarding the GRASP general rules on assessment procedure and the applicable GLOBALG.A.P. general regulations.
- k) These qualifications shall be verified by the CB prior to submitting any assessor approval to GLOBALG.A.P. CBs shall provide GLOBALG.A.P. with a written statement confirming this signed by the IHT.

7.3 Maintenance of competency

The CB shall have a procedure in place to maintain the knowledge and competency of the GRASP assessor.

- a) Training by the IHT shall be provided whenever there are changes in legislation. Equivalent external training may also be provided instead.
- b) GRASP assessors shall complete all new GRASP IHT trainings (whenever new trainings become available).
- c) The CB shall carry out a GRASP witness assessment or reassessment for each of its GRASP assessors at least once every 4 years to verify competence.
- d) The CB shall ensure that every GRASP assessor conducts at least two assessments annually, at a number of different producers to maintain competence.
- e) Systems shall be in place within the CB structure to have the GRASP assessors informed and aware of developments (e.g., NIGs), issues, and legislative changes relevant to GRASP in the country where they apply GRASP. Lack of knowledge of labor laws and regulations, or missing, contradictory, or unexplained/unaddressed labor information in the NIG, will not excuse non-compliance within the Certification Integrity Program (CIPRO).

7.4 IHT qualifications

Before assessing GRASP, CBs must have a GRASP IHT responsible for training, qualification, and maintenance of competency of all GRASP assessors. This IHT shall comply with all the requirements indicated in the GLOBALG.A.P. general regulations and all of the following:

The selected GRASP IHT shall

1. Fulfill the GRASP assessor requirements indicated in this document and the GLOBALG.A.P. auditor requirements
2. Take the GRASP IHT training and pass the GRASP IHT test
3. Take any GRASP IHT updates training when available

7.4.1 Main activities of the IHT

- a) Setting up a system to demonstrate that key staff is informed and aware of developments, issues, and legislative changes relevant to compliance with the GRASP general rules (this document)
- b) Ensuring qualification updates of the GRASP assessors as soon as online training updates, legislative changes, and/or updates to the normative documents or GRASP NIGs are available
- c) Witnessing at least one GRASP Option 1 individual producer or Option 2 producer group member and one Option 2 GRASP QMS audit by a GRASP assessor before that assessor can be signed-off
- d) Checking and assuming responsibility for any information submitted by the auditors to the GLOBALG.A.P. Secretariat
- e) Informing GLOBALG.A.P. within 24 hours of changes that affect the competency of any approved GRASP assessor

7.5 Formal qualifications for internal QMS and farm auditors in GRASP

Both must provide evidence of compliance with the qualification requirements in the GLOBALG.A.P. general regulations, along with the following:

- a) Knowledge of the GRASP general rules on evidence, country risk, and interviews
- b) Knowledge about and/or access to legal labor regulations, human rights issues, and ILO labor conventions
- c) Knowledge of the GRASP NIG (as soon as available) of the respective country
- d) Working language skills in the corresponding native/working language where the assessments will take place

8 GRASP COMPLIANCE SYSTEM

In addition to the latest GLOBALG.A.P. general regulations, the following GRASP-specific rules shall apply:

8.1 GRASP assessment results

The GRASP compliance level conformance is based on a scoring system result. The GRASP checklist consists of two levels of P&Cs: Major Musts and Minor Musts.

8.1.1 Compliance level requirements

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

Compliance rules only for **family farms without workers**:

- **Major Musts: 100% compliance** with all applicable Major Must criteria is compulsory in **all** the assessments.
- **Minor Musts:** any non-compliance of Minor Must criteria is accepted in the initial assessment of this GRASP version.
- **Minor Musts: 100%** compliance with all Minor Must criteria is compulsory in all *following subsequent and/or surveillance assessments* of this GRASP version.

The producer shall comply with the GLOBALG.A.P. general regulations in their current version in reference to compliance level requirements.

8.1.2 Minor Must calculations

For initial assessment

The minimum required Minor Must compliance in the initial assessment is calculated using the following formula:

$$\left\{ \begin{array}{l} \text{(Total number} \\ \text{of} \\ \text{Minor Must} \\ \text{criteria:)} 25 \end{array} \right\} \times 70\% = \begin{array}{l} \text{(Minimum total} \\ \text{Minor Must criteria} \\ \text{compliance required)} \end{array}$$

That is, 25 Minor Must criteria × 0.7 = 25 × 0.7 =17.5, which is rounded up to 18 Minor Must criteria to comply with, at minimum.

The maximum number of Minor Must criteria non-compliances allowed is 7 (25 total – 18). Therefore, a producer must have at least 18 Minor Must criteria that are compliant and may have no more than 7 that are non-compliant.

If a producer has 17 compliant Minor Must criteria, this gives a compliance level of 68%, which would **not conform to the minimum compliance level of GRASP**.

Note: A score of 69.8%, for example, *cannot* be rounded up to 70% (the passing percentage).

For surveillance and subsequent assessment

The minimum required Minor Must compliance in subsequent assessments is calculated using the following formula:

$$\left\{ \begin{array}{l} \text{(Total number} \\ \text{of} \\ \text{Minor Must} \\ \text{criteria:)} 25 \end{array} \right\} \times 75\% = \text{(Total Minor Must} \\ \text{criteria compliance} \\ \text{required)}$$

That is, 25 Minor Must criteria × 0.75 = 25 × 0.75 =18.75, which is rounded up to 19 Minor Must criteria to comply with, at minimum.

8.2 Letter of conformance decision

The decision to provide the letter of conformance shall be made by an already qualified GRASP assessor different from the person who conducted the GRASP assessment and following the GLOBALG.A.P. general regulations and the rules in this document.

Confidentiality, data use, and data release

The detailed results of the GRASP assessment are visible solely to users of the GLOBALG.A.P. IT systems according to the terms and conditions in the data access rules.

The letter of conformance and results of the GRASP assessment are displayed in the GLOBALG.A.P. IT systems if and only if:

- a) The required levels of compliances are documented in the scoring system.
- b) A valid GLOBALG.A.P. primary production or equivalent benchmarked scheme/AMC certificate is at hand and there is evidence that P&Cs on workers' well-being were verified and fully compliant.

If the required levels are not reached due to non-compliances, and the non-compliances are *not* corrected as per the GLOBALG.A.P. general regulations, the GRASP checklist with all non-compliances, outstanding corrective actions, and respective remarks shall be uploaded to the GLOBALG.A.P. IT systems. This is then the final assessment report, and the CB decision committee will issue a suspension and/or other sanctions following the GLOBALG.A.P. general regulations for producer non-conformances. This information will be available solely to users of the GLOBALG.A.P. IT systems according to the terms and conditions in the data access rules.

The overall result will reflect an open non-conformance or suspension.

For Option 1 without QMS that requires a declaration that GRASP is not applicable, there will be a final assessment report indicating the verification of the assessor of the workerless situation during the year prior to the assessment.

8.3 Unannounced primary production recertification audit combined with GRASP assessment

The GRASP add-on program does not require that producers receive unannounced surveillance audits. However, GRASP shall be assessed during a producer/producer group unannounced primary production audit when required to follow the GLOBALG.A.P. general regulations for audit processes for initial, surveillance, and subsequent assessments. In this case, the producer/producer group may be notified of the GRASP assessment as soon as the CB auditor is able to begin the primary production unannounced audit.

8.4 Non-compliance and non-conformance in GRASP

The CB shall apply the latest GLOBALG.A.P. general regulations related to producers, producer groups, or multisite producers with QMS and shall also apply any specific indication included in this document, with respect to:

- a) The handling of non-conformances detected during the CB audit
- b) The application of sanctions (warning, suspension, or cancelation)

A suspension or cancelation will result in the total prohibition (all products, all sites) of the use of the GRASP letter of conformance and any device or document that may be linked to the GRASP add-on.

A producer who has received a cancelation shall not be accepted for a new GRASP assessment for the period indicated in the GLOBALG.A.P. general regulations.

Non-compliances and non-conformances of producers without letter of conformance will be recorded in the GLOBALG.A.P. IT systems and accessible based on the data access rules of GLOBALG.A.P.

8.5 Letter of conformance and assessment cycle

In addition to the latest GLOBALG.A.P. general regulations about certification process and the GLOBALG.A.P. general add-on rules, the following GRASP-specific rules shall apply:

- a) The GRASP letter of conformance shall be issued if and only if a valid GLOBALG.A.P. primary production or equivalent benchmarked scheme/AMC certificate is at hand and there is evidence that P&Cs on workers' well-being were verified and fully compliant.
- b) The GRASP letter of conformance shall be issued if and only if the required Major Must and Minor Must levels have been achieved and are documented in the GLOBALG.A.P. IT systems.
- c) The GRASP letter of conformance shall be issued to the same legal entity (i.e., producer group/multisite producer) holding the valid GLOBALG.A.P. primary production or equivalent benchmarked scheme/AMC certificate.
- d) The assessment approval cycle is 12 months, subject to any sanctions and extensions in accordance with the scope described.

8.6 Letter of conformance information

The letter of conformance will be issued by the GLOBALG.A.P. IT system, following the latest GLOBALG.A.P. general regulations and the GLOBALG.A.P. general add-on rules.

8.7 Integrity program

For the GRASP integrity program, the same rules apply as set for the integrity program in the currently valid GLOBALG.A.P. general regulations.

9 DECISION-MAKING/GOVERNANCE

Any decision on GRASP is under the final responsibility of the GLOBALG.A.P. Advisory Board. An elected GRASP Technical Committee is responsible for all technical issues concerning the GRASP P&Cs, the NIGs, and all other GRASP normative and supporting documents.

10 ABBREVIATIONS AND DEFINITIONS OF TERMS

10.1 Abbreviations

The following acronyms apply to this and all other GRASP-related documents:

AMC	Approved modified checklist
CB	Certification body
FAQs	Frequently asked questions
GRASP	GLOBLG.A.P. Risk Assessment on Social Practice
IHT	In-house trainer
ILO	International Labour Organization
NIG	National interpretation guideline
P&C(s)	Principle(s) and criteria
PHU	Product handling unit
QMS	Quality management system
TC	Technical committee

10.2 Definitions/Glossary

Please refer to the GRASP glossary for a list of all definitions related to the GRASP add-on.

You can find the GRASP normative and supporting documents on the GLOBALG.A.P. website.

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