	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	29 / 14
		Revision Number :	00
		Revision Date :	

1. INTRODUCTION

This document describes the basic and generic rules for any party seeking verification against the GRASP Add-on.

The GRASP Tools were developed in a public private partnership project between 2005 and 2010, involving various field trials and stakeholder consultations worldwide. The GRASP Module is mostly based on document checks and is applied to assess social risks in primary production. It helps producers to address important social issues and build awareness at farm level.

The GRASP Add-on rules provide a framework where a producer can comply with a set of requirements in addition to the compliance with the GLOBALG.A.P. Standard. The GRASP General Rules define the specific requirements of GRASP – for all requirements that are not described here in this document, the valid version of the GLOBALG.A.P. General Regulations shall apply. Furthermore, the General Add-on Rules document (available in the GLOBALG.A.P. Document Center) describes the Add-on concept and the generic rules for every Add-on.

Based on the fact that the GRASP Control Points and Compliance Criteria are voluntary requirements, verification against them is not covered under the GLOBALG.A.P. accreditation. The GRASP Add-on consists of 13 control points and compliance criteria: 11 control points for single producers and producer groups, 1 extra control point for the producer groups' Quality Management Systems (QMS) and 1 control point for recommended social practices.


GRASP can be assessed in combination with the GLOBALG.A.P. primary production standards or equivalent benchmarked schemes/AMC. Furthermore, GRASP can be assessed in every country – even where a GLOBALG.A.P. approved GRASP National Interpretation Guideline does not exist. In cases where a country does not have a GRASP Interpretation Guideline, the applicants (e.g. supplier, retailer, Certification Body) that are asking for the GRASP assessments need to hand in a project plan for the development of such an interpretation guideline to the Secretariat. This plan shall also include evidence of the qualification of the auditors and inspectors, who conduct the assessments in the respective country without the National Interpretation Guideline.

2. NORMATIVE DOCUMENTS

The GRASP normative documents are based on the relevant parts of the International Labor Organization (ILO) conventions. The GRASP documents provide information for the implementation and assessment of basic social criteria at companies where the GLOBALG.A.P. primary production standard or an equivalent benchmarked scheme/AMC has already been implemented. The following normative documents (and any other documents released as normative) are relevant:

- a) GRASP General Rules (this document): The General Rules describe the basic steps and considerations relevant for the applicant producer to implement the GRASP Module, how the assessment process works, as well as the roles of and relationships between the producers, GLOBALG.A.P. and the Certification Bodies (CBs)/auditing companies/GRASP assessors. Furthermore, it describes the tasks of the CBs/auditing companies/GRASP assessors as well as information on the application and the assessment procedure.
- b) The GRASP Add-on Module, i.e. the Control Points and Compliance Criteria (CPCC): This document sets the compliance requirements that shall be followed by the producer. As the GRASP Module is a voluntary module, there is no passing or failing the module – only the level of compliance per control point and the overall compliance level are indicated in the GRASP Checklist.
- c) The GRASP Add-on Checklists: These checklists for Option 1/Option 1 multisite with or without QMS and for Option 2 producer groups are based on the CPCC and must be used for external assessments,

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	30 / 14
		Revision Number :	00
		Revision Date :	

internal group assessments and self-assessments. The GRASP assessment becomes valid only if, after the external GRASP assessment, the completed GRASP Checklist has been uploaded to the GLOBALG.A.P. Database and if the producer has a valid GLOBALG.A.P. primary production or equivalent benchmarked scheme/AMC certificate.

- d) During the assessment the control points and compliance criteria serve as a headline. The assessment procedure follows the sub-control points listed in the GRASP Checklist.
- e) GRASP National Interpretation Guidelines (NIG): The GRASP National Interpretation Guidelines provide guidance to producers and assessors on the respective legal framework of the country and in certain cases the regions. The development of GRASP NIG should be backed by local stakeholder consultation and other existing local structures such as the GLOBALG.A.P. National Technical Working Groups (NTWGs), in order to ensure transparency, its proper elaboration (and/or adaptation if necessary) and correct interpretation of the respective national legislation. It is important that the group developing the guidelines should represent the main local stakeholders concerned, such as producer organizations, NGOs, trade unions, public sector representatives, etc. The GRASP Technical Committee reviews and the GLOBALG.A.P. Secretariat finalizes and publishes the NIG. The GRASP NIGs must be reviewed at least once a year by the GLOBALG.A.P. NTWG or by the responsible group of main local stakeholders. More details on the process of the development of GRASP NIGs are provided in Annex I.


2.1 Supporting Documents

- a) GRASP Implementation Guideline/Frequently Asked Questions (FAQs): The GRASP Implementation Guideline/FAQs (whichever is available) provides guidance for producers and producer group managers. Neither the Implementation Guideline, nor the FAQs are normative documents. They are supportive documents with examples and ideas on how to implement the GRASP Module. They explain how a social management system to address social issues can be established according to the GRASP Module and give examples and recommendations on implementation steps. Available template documents will likely have to be adjusted according to the specific situation at the company and the legal requirements of the country.

3. REFERENCE DOCUMENTS

- a) TS EN ISO/IEC 17000:2020 Conformity assessment - Vocabulary and general principles
- b) ISO/IEC 17007:2009 Conformity assessment - Guidance for drafting normative documents suitable for use for conformity assessment
- c) ISO/IEC 17011:2018 Conformity assessment - Requirements for accreditation bodies accrediting conformity assessment bodies
- d) ISO/IEC 17020:2012: Conformity assessment - Requirements for the operation of various types of bodies performing inspection
- e) ISO/IEC 17021-1:2015: Conformity assessment - Requirements for bodies providing audit and certification of management systems- Part 1: Requirements
- f) ISO/IEC 17021-2:2016: Conformity assessment — Requirements for bodies providing audit and certification of management systems — Part 2: Competence requirements for auditing and certification of environmental management systems
- g) ISO/IEC 17021-3:2017: Conformity assessment — Requirements for bodies providing audit and certification of management systems — Part 3: Competence requirements for auditing and certification of quality management systems
- h) ISO/IEC 17025:2017: General requirements for the competence of testing and calibration laboratories
- i) ISO/IEC TR 17026:2015: Conformity assessment — Example of a certification scheme for tangible products
- j) ISO/IEC 17030:2003: Conformity assessment — General requirements for third-party marks of conformity
- k) ISO/IEC 17040:2005: Conformity assessment — General requirements for peer assessment of conformity assessment bodies and accreditation bodies

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	31 / 14
		Revision Number :	00
		Revision Date :	

- l) ISO/IEC 17050-1:2010: Conformity assessment — Supplier's declaration of conformity — Part 1: General requirements
- m) ISO/IEC 17050-2:2005: Conformity assessment — Supplier's declaration of conformity — Part 2: Supporting documentation
- n) ISO/IEC 17065:2012: Conformity Assessment – Requirements for bodies certifying products, processes and services
- o) ISO/IEC 17067:2013: Conformity assessment — Fundamentals of product certification and guidelines for product certification schemes
- p) TS EN ISO/IEC 17067: Conformity assessment — Fundamentals of product certification and guidelines for product certification schemes
- q) ISO 19011:2018: Guidelines for auditing management systems
- r) ISO Guide 23 1982 Methods of indicating conformity with standards for third party certification systems
- s) TS ISO Guide 27 Guidelines for the corrective action to be taken by a certification body in the event of misuse of its mark of conformity

4. DOCUMENT CONTROL

- a) The latest version of the GRASP Add-on documents can be downloaded free of charge from the GLOBALG.A.P. website.
- b) Language: Original documents are in English. The GRASP documents are translated into relevant languages. In case of discrepancy between translations, the English version shall prevail.
- c) Changes to the documents:
 - (i) Normative documents are identified with a unique document code and a version number and date.
 - (ii) The date in the version name indicates the date of publication of the document.
 - (iii) Version number: A change in the first digit (e.g. change from 1.x to 2.0) indicates a version change. A change in the second digit indicates updates of the same version.
 - (iv) Updates can be made independently in the General Rules and Control Points and Compliance Criteria documents, but a version change has an effect on all normative documents.
 - (v) The updates are sent to all GRASP Observers and finally approved certification bodies as official communications. It is the responsibility of the observers to inform their clients of such updates. See more information about the GRASP Observers in 4.2.1 b) and Annex II in this document.


5. CERTIFICATION OPTIONS

Any producer (see definition of this term in point 9.2 in this document) of primary agricultural products, whose production processes are certified against a GLOBALG.A.P. primary production standard or an equivalent benchmarked scheme/AMC may apply for a GRASP assessment through a GLOBALG.A.P. finally approved Certification Body (CB). GRASP cannot be a stand-alone module, as it relies on and complements the Workers Health, Safety and Welfare chapter of GLOBALG.A.P. primary production standards or an equivalent benchmarked scheme/AMC.

Applicants can apply for an assessment under one of two options (individual producer or producer group). The options are based on the constitution of the applicant's legal entity. The assessment process for each of these options is described below.

GRASP control points are not applicable if the producer does not employ any employees (e.g. a family run business with core family members, no employees at any time of the year). See 5. for assessment procedures. Chapter 9.2 defines the core family members.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	32 / 14
		Revision Number :	00
		Revision Date :	

In the master data of the GRASP Checklist, the field “Company description” shall contain qualitative information about the company, for example explaining

- the organizational structure, including specific employment conditions or structure
- location of the sites, units and (head/human resource) offices and, if applicable
- the different seasons of activities or intervals of hiring labor/fluctuation as well as
- whether producer group members belong to several producer groups or
- whether producers/producer groups have any production that is covered by IFA but cannot be registered in the GLOBALG.A.P. Database.

Any additional information which completes the assessment is relevant and shall be mentioned in the Company description.

5.1 Option 1 – Individual Producer

An individual producer is a person (individual) or a business as defined in the current version of the GLOBALG.A.P. General Regulations. The producer is a registered legal entity owning the production, relevant to the scope of GRASP (certified in accordance with a GLOBALG.A.P. Standard), who has the legal responsibility for the products sold by that farming business.

- a) An individual producer applies for assessment.
- b) The individual producer receives Proof of Assessment.

(i) Option 1 – Multisite without Implementation of a QMS

An individual producer or one organization owns several production locations or production units that do not function as separate legal entities and there is no implementation of a central Quality Management System (QMS).

During the CB assessment of individual producers with multisites that do not implement a QMS, the Option 1 GRASP Checklist shall be used. The inspection shall cover:

- All accepted IFA products and production processes
- All registered production sites
- Each registered product handling unit, where relevant, the administrative sites

(ii) Adding sites – Multisite without Implementation of a QMS

If, during the 12 months of the most recent assessment’s validity, a new site where at least one new employee is hired is added under GRASP, a GRASP assessment of that site shall be conducted, and the GRASP Checklist shall be updated in the GLOBALG.A.P. Database.


(iii) Option 1 – Multisite with Implementation of a QMS

An individual producer or one organization owns several production locations or production units that do not function as separate legal entities, but where a QMS has been implemented. During the CB assessment of individual producers with multisites that implement a QMS, the Option 2 GRASP Checklist shall be used. The inspection shall cover the square root of the registered production sites and the audit of the QMS.

(iv) Adding sites – Multisite with Implementation of a QMS

If, during the 12 months of the most recent assessment’s validity, a new site where at least one new employee is hired, a GRASP assessment of that site shall be conducted, and the re-audit of the QMS is required. The GRASP Checklist shall be updated in the GLOBALG.A.P. Database.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	33 / 14
		Revision Number :	00
		Revision Date :	

5.2 Option 2 – Producer Group

A producer group is a group of producers as defined in the current version of the GLOBALG.A.P. General Regulations. A group must have a QMS implemented and comply with rules similar to the rules set out in the QMS Rules of the current GLOBALG.A.P. General Regulations version. All members of this producer group must be included in the internal QMS of the group. The group must have a legal structure, a management representative with ultimate responsibility, contracts with each producer stating entry and exit requirements, stipulated suspensions, and agreement to comply with GRASP requirements for registered members. A list of all members of the producer group with the relevant registration status must be available.

- a) A producer group applies for assessment.
- b) The group, as a legal entity, receives Proof of Assessment.

5.3 Product Handling

Where product handling is included in the scope of the GLOBALG.A.P. or equivalent benchmarked scheme/AMC certificate, GRASP also covers the product handling unit. During the external assessment performed by the CB, the product handling unit is assessed in addition to the individual producer/the producer group members. It is not required to use and file a separate GRASP Checklist for the product handling unit (PHU). More assessment details are explained in Chapter 5.2.2.

5.4 Subcontractors

Subcontractor of any tier: Based on the definition of “subcontractor” provided in the GLOBALG.A.P. General Regulations v5.2 and v5.3-GFS Part I, Annex I.4 Definitions, GRASP subcontractors are those entities furnishing labor, equipment, and/or materials to perform specific farm operation(s) under contract with the producer, directly or indirectly related to the Integrated Farm Assurance (IFA) standard. Examples of directly related activities might be spraying and picking of fruit, while indirectly related activities might be kitchen staff cooking meals for the workers.

In the master data of the GRASP Checklist, assessors shall note which activity is subcontracted and make use of remarks to explain any specific or non-compliant scenario.

Subcontractors are employees hired by an agency, a payroll company or the producer, subcontracted producers or companies that are subcontracted for any activity included in the scope of the GLOBALG.A.P. Certificate. In every case the responsibility for the certified produce is still with the company and it owns the product under certified process.

Tasks performed by subcontractors and covered by the GLOBALG.A.P. or equivalent benchmarked scheme/AMC certificate shall also be included in the GRASP assessment. During the registration with the CB the producer shall inform the CB about the subcontracted activities. The producer is responsible for the compliance with the control points applicable to the tasks performed by the subcontractor for each task and season contracted. The producer shall ensure that the subcontractor follows the GRASP requirements. Evidence of this compliance has to be provided by the producer, e.g. submitting payslips or other relevant documents. The subcontractor must accept that GLOBALG.A.P. approved certifiers are allowed to verify the assessments through a physical inspection where there is doubt.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	34 / 14
		Revision Number :	00
		Revision Date :	

5.5 GRASP with Chain of Custody (COC)

The GRASP Add-On is based on the GLOBALG.A.P. primary production standard that – unlike Chain of Custody – includes control points of the workers’ health, safety and welfare. The scope for GRASP remains on primary production, which is why GRASP is not applicable with CoC certification.

6 REGISTRATION PROCESS

6.1 Individual Producers/Producer Groups

- a) The applicant shall register with a GLOBALG.A.P. finally approved CB specific to the relevant scope combinable with GRASP, e.g. Crops, Flowers, Livestock, Aquaculture, etc.
- b) Information on finally approved CBs is published on the GLOBALG.A.P. website.

6.2 Registration

Registration for a GLOBALG.A.P. or a equivalent benchmarked scheme/AMC is a pre-requisite. The corresponding GLOBALG.A.P. Number (GGN) or Global Location Number (GLN) must be shared with the CB during registration.

6.2.1 General

- a) The application must cover at least the information detailed in the Registration Data Requirements of the valid GLOBALG.A.P. General Regulations.

By registering, the applicant commits to comply with the following:

- (i) Payment of the applicable fees established.
 - (ii) Communication of data updates to the CB.
 - (iii) The update of the terms and conditions of the Sub-License and Certification Agreement (with the CB).
- b) Confidentiality, data use and data release:
- (i) During registration applicants give written permission to GLOBALG.A.P. and the CB to use the registration data for internal processes and sanctioning procedures if applicable.
 - (ii) All data in the GLOBALG.A.P. Database is available to GLOBALG.A.P. and the CB which the producer or producer group is working with and can be used for internal processes.
 - (iii) CBs may not release any data to other third parties without the written consent of the applicant.
 - (iv) The results of the GRASP assessment are only visible to database users who agreed to the terms and conditions for GRASP Observers here and have the assigned user rights (GRASP Observer). The following data is available to the GRASP Observers: Company name and address, GGN/GLN, CB registration no. if available, GRASP version, option, CB, GRASP status and compliance level, number of producers (in case of Option 2), number of employees and the GRASP Checklist with the external assessment results.
- c) The duration of the service contract is set between the CB and the producer.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	35 / 14
		Revision Number :	00
		Revision Date :	

d) An applicant:

- (i) May not register production units or group members in different countries.
- (ii) May register for the GRASP assessment with a different CB from the one that granted the primary production certification.

6.2.2 Registration with a new CB

If a producer who has already been registered, changes CB or applies to a new CB for assessment, the producer must communicate any relevant GLN/GGN to the new CB. If the applicant fails to do so and the CB double-registers the applicant, a EURO 100 administration fee for an Option 1 producer group and EURO 500 administration fee for an Option 2 producer group shall apply.

6.3 Acceptance

For the registration to be accepted, applicants must satisfy all the following conditions:

- a) Submit to the CB the relevant application, which shall include all the necessary information. Applicants shall have formally committed to comply with the obligations indicated above.
- b) Sign acceptance of the Sub-License and Certification Agreement with the CB, or applicants shall explicitly acknowledge the receipt and the inclusion of these agreements with their signature on the service contract/agreement with the CB and the CB must hand over a copy to the producer.
- c) Pay the registration fee for GRASP as set out in the current GLOBALG.A.P. fee table.
- d) The registration and acceptance process must be finalized before assessment can take place.


6.4 Certification Body Registration Rules for the GRASP Add-on

- a) In cases where a GLOBALG.A.P. finally approved CB uses inspectors/auditors who are already qualified for GLOBALG.A.P. primary production, those auditors/inspectors will be authorized to carry out GRASP assessments for the respective sub-scope if they comply with the additional qualification requirements. A list of GRASP assessors for the GRASP Add-on module shall be registered in the GLOBALG.A.P. Database.
- b) In case the inspectors/auditors are not qualified for GLOBALG.A.P. primary production, but are social auditors as specified in Chapter 6.2.2 who accompany GLOBALG.A.P. auditors in countries without a GRASP NIG, the CB shall keep the evidence (training records, certificates, etc.).

6.4.1 GLOBALG.A.P. Finally Approved CBs Shall Proceed as Follows:

- a) They shall apply for the GRASP Add-on.
- b) They shall pay an annual registration fee according to the GLOBALG.A.P. fee table that will allow the CBs to assess against the GRASP Add-on program.
- c) They shall follow the database wiki instructions for the assessor registration, producer registration and checklist upload.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	36 / 14
		Revision Number :	00
		Revision Date :	

6.4.2 CB Approval Process

To become a provisionally approved CB for GRASP, all of the following requirements shall be complied with:

- a) The CB shall be finally approved for any scope within GLOBALG.A.P.
- b) A staff member shall have attended the face-to-face GRASP in-house trainer course or one inspector/auditor shall have passed the GRASP online test.
- c) The GRASP scope extension fee, according to the GLOBALG.A.P. fee table, shall have been paid.

Full approval shall be granted when all of the following are true:

- a) A staff member has passed the GRASP online test.
- b) A staff member has attended the face-to-face GRASP in-house trainer course.
- c) The CB is accredited for any scope within the GLOBALG.A.P. primary production standards.

6.4.3 Additional Requirements for GRASP in Countries without a National Interpretation Guideline (NIG)

Certification Bodies can apply to perform GRASP assessments in countries without an NIG (no-NIG countries).

If there is no other stakeholder group working on a NIG, the CB applying to conduct assessments shall send, along with its application to the GLOBALG.A.P. Secretariat, a plan for the development of a NIG for GRASP. In addition, the inspectors/auditors who wish to perform the GRASP assessments shall have to prove that they comply with the GRASP qualification requirements.

The GLOBALG.A.P. Secretariat recommends contacting the National Technical Working Group (NTWG) of the relevant country, where possible. If that NTWG does not intend to develop a NIG, the CB can work independently. See also Annex I for Terms of reference for the development of GRASP National Interpretation Guidelines.


CBs are allowed to issue a maximum of 20 GRASP assessments in a no-NIG country. The 20 assessments are counted not per CB but as the sum of all assessments by approved CBs in a respective country from the publication date of the Technical News, Issue 03/2020 – GRASP Edition.

The GLOBALG.A.P. Secretariat monitors the number of assessments in no-NIG countries on a regular basis and informs the CBs that are active in those countries.

From the publication date of the Technical News, Issue 03/2020 – GRASP Edition, if in a new no-NIG country of assessment more than 20 GRASP assessment license holders are assessed by GLOBALG.A.P. approved GRASP assessors, the GLOBALG.A.P. Secretariat will

- close that country in the GLOBALG.A.P. Database for further GRASP assessments,
- contact the CBs to develop a GRASP National Interpretation Guideline, and
- open the country again for GRASP assessments as soon as the GRASP National Interpretation Guideline is approved and published.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	37 / 14
		Revision Number :	00
		Revision Date :	

7 ASSESSMENT PROCEDURES

7.1 Self-assessments

- a) For Option 1 producers, the GRASP self-assessment before the CB assessment is obligatory. During the CB GRASP assessment, the GRASP assessors shall check whether the self- assessment has been conducted. This shall support the producer in preparing for the external GRASP assessment and help the GRASP assessor find indicators for further investigations, especially if there are deviations between the self-assessment and the CB assessment. Option 1 single producers without QMS shall use the Option 1 GRASP Checklist and follow the rules indicated in the valid version of the IFA General Regulations Part I. If the self-assessment has not been conducted, the CB assessment cannot take place and shall be rescheduled. Option 1 producers where a QMS is implemented, shall use the Option 2 GRASP Checklist.
- b) For producer groups under Option 2, GRASP requires a minimum of one internal inspection per annum of each GRASP registered producer within the producer group. A GRASP self- assessment by each member of the group is only required if it is an internal requirement by the group, but it is not a GLOBALG.A.P. requirement.

Option 2 producer groups can use the Option 1 single GRASP Checklist for every producer group member and produce/product handling unit. The results shall be summarized at the end. Option 2 producer groups can also use the GRASP internal checklist provided on the GLOBALG.A.P. website.


7.2 Third Party Assessment

- a) GRASP requires a third-party assessment conducted by an independent, finally approved CB. The GRASP assessment should be conducted together with the GLOBALG.A.P. primary production inspection/audit.
- b) The inspections shall be carried out by inspectors/auditors who meet the requirements as defined in Chapter 6.
- c) The CB shall always inspect the complete checklist of the GRASP Add-on module.
- d) The aim of remarks and comments in the GRASP Checklist is to make the assessment trail transparent and to provide a better classification of the information collected during the assessment. Remarks and comments shall be given in all cases (Yes/No/Not Applicable) for every control point assessed in all internal and external assessments. Remarks and comments (e.g. which document(s) were sampled) shall be site-specific and included in the checklist, showing that all the control points have been properly assessed.

In cases where a control point is not applicable, a clear written justification must be given under "Remarks/Comments" (e.g. for CPCC 9 when no children of employees are living on the site). Examples: Remarks can be details related to the way of finding (or not finding!) evidence: sample size increased due to ...; interviews not possible with ...; or to relevant circumstances: interpreter is/engaged by ...; documents not available, because ...

- e) Names and personal data of responsible persons or other employees shall not be entered in the "Remarks/Comments" field of the GRASP Checklist. Instead, initials/other abbreviations shall be used. Alternatively, the position of the employee or internal codes/numbers assigned by the producer/company may be used. Other personal data of employees (e.g. contract, time records, pay-sheets) that have to be accessible for the assessor have to 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 employees, the employer shall forward this to the employees.
- f) After the upload of the checklist to the GLOBALG.A.P. Database, the CB issues a Proof of Assessment to the producer/producer group. This Proof of Assessment is generated through the GLOBALG.A.P.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	38 / 14
		Revision Number :	00
		Revision Date :	

Database. If the CB issues a Proof of Assessment that is not generated through the GLOBALG.A.P. Database, it must conform completely to the template in Annex V. The paper Proof of Assessment may only be issued based on the information available at that time in the GLOBALG.A.P. Database for that unique GLOBALG.A.P. Number (GGN/GLN). In case of Option 2, this proof of assessment also lists all participating (internally GRASP assessed) members of the producer group.

7.2.1 Subcontractors

Good social practices shall be implemented across all business functions and relations (due diligence), thus subcontractors and service providers shall likewise express their commitment and responsibility to following the GRASP requirements. At minimum, subcontractors and service providers shall set up and sign a GRASP self-declaration on good social practices. further evidence for compliance with the GRASP requirements shall be provided:

- directly by the subcontractor/at the subcontractor's office/sites to the respective control points: The CB assesses the subcontractor as part of the producer audit;
- by the producer (requiring, e.g. copies of records, documents, proofs from the subcontractor regarding the specific control points, to be provided to the assessor): The producer assesses the subcontractor during self-assessment and gets all the needed evidence as to be able to answer and to show evidence for all applicable requirements during his assessment; or
- the subcontractor holds a valid proof of social auditing/certificate of social compliance for the same scope under GLOBALG.A.P. certification that includes the service they provide to the producer who applied for GRASP.


If national legislation or data protection rules do not allow subcontractors to share certain documentation with the CB (e.g. individual records of employees), the GRASP assessors shall put a remark on the applicable control point in the GRASP Checklist. Instead of evaluating documents and records of the subcontracted employees, the subcontractors shall prove compliance by preparing, and then sharing with the GRASP assessor, other assessment evidence (e.g. declaration prepared by the subcontractor and checked by the producer, proof by authorities or national certification schemes) outlining the system that is implemented and instruments and measures that are applied in order to fulfill GRASP requirements.

In cases of doubt, the CB's assessor is still allowed to choose an office/site visit at the subcontractor's premises if in compliance with the data protection rules of the country. Ultimately, the GLOBALG.A.P. producer will be held accountable for non-compliances.

- a) Subcontractors must agree that GLOBALG.A.P. finally approved CBs are allowed to verify the assessments through a physical inspection where there is a doubt. See also 3.4.
- b) In countries where subcontractors are inspected against another scheme by an external party (not GLOBALG.A.P. finally approved CB), the subcontractor shall receive either of the following:
 - A letter of conformance from the CB that is not GLOBALG.A.P. finally approved, with the following information: 1) date of assessment, 2) name of the CB, 3) assessor's name, 4) details of the subcontractor, and 5) comments and justification for the control points that are not assessed.
 - A comparable standard certificate recognized by the industry as mentioned in the National Interpretation Guideline of the country if available.

Remarks shall explain the applicable subcontracting scenario.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	39 / 14
		Revision Number :	00
		Revision Date :	

7.2.2 Option 1 – Individual Producer (with/without a QMS)

- a) The producer receives an annual assessment.
- b) In order to ensure the one-stop-shop principle of GLOBALG.A.P. Certification, the GRASP assessment should be conducted together with the GLOBALG.A.P. primary production inspection/audit.
- c) Multisite operations with QMS shall implement GRASP on all sites and in the PHU. Internally, each site shall be assessed. Externally, the CB assesses a sample (square root) of the sites and the central PHU. It is not required to use and file a separate GRASP Checklist for the PHU. The final GRASP report combines the results and the assessment notes of all visited sites and the PHU, indicating any differing condition between the sites. See more information in 5.2.4.
- d) Producers that have no employees have to state in a self-declaration that all GRASP control points are not applicable. A physical external assessment by the CB is not required. However, the GRASP Checklist still has to be filled in with all non-applicable points and uploaded in the GLOBALG.A.P. Database.

7.2.3 Option 2 – Producer Group

Only GLOBALG.A.P. Option 2 certified producer groups can be assessed for GRASP as a group. The producer group is assessed according to the Option 2 GRASP Checklist.

- a) A minimum of one internal inspection per annum of each registered producer within the producer group must be carried out by qualified internal producer group inspectors or subcontracted to an external verification body, different from the CB responsible for the external inspections of the group. During the internal inspection, the internal inspector shall follow the basic principles for inspection following the ISO 65 requirements (i.e. sampling of records to achieve evidence of compliance). The results of the internal assessments shall be kept and summarized in the GRASP Internal Checklist for Producer Groups. In the GLOBALG.A.P. Database every internally assessed producer group member (Option 2) has to be accepted.
- b) The annual external assessment carried out by a CB checks how the QMS functions (i.e. have all group members been internally assessed?) and conducts an external assessment with a sample (square root) of producer members registered for GRASP. The auditor/inspector shall assess the level of the implementation of the internal quality management system as described in the QMS control point in the GRASP CPCCs and check the plausibility of the internal inspection results.
- c) The CB does not inspect all producers of a producer group, but the square root. It is not the responsibility of the CB to determine the compliance of each producer (this responsibility rests with the applicant). The CB must assess whether the applicant's internal controls are appropriate.


Example: Producer group with 25 members applies for GRASP, the CB assesses 5 producer group members externally (square root 25).

- d) It is not possible to assess only product handling units or the producer group's own production. If the assessment of the group's own production is required (meaning for the same products as cultivated by the producer group members), this shall be included in the group's assessment.

Example:

A producer group is certified for melons: The producer group members grow melons, and the certificate holder has melons on its own fields, as well. The melons of both are subject to the Option 2 GRASP assessment.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	40 / 14
		Revision Number :	00
		Revision Date :	

A producer group is certified for melons: Producer group members grow melons (only). On its own fields, the certificate holder grows courgettes under Option 1. The melons of the members are assessed under Option 2, the courgettes under Option 1.

- e) If new producer group members apply for GRASP during the 12 months of the assessment validity, the following principle applies: an audit of the QMS is required if
- the new members (who also have employees) are more than 10% of the members who are already GRASP assessed, and/or
 - more than 10% of the existing GRASP producers (who had no employees before) contract employees .
- f) Producers without employees that form part of a producer group must be included in the internal quality management system of the group to ensure that in case the producer employs someone, GRASP is implemented. Farms without employees (GRASP N/A) shall form part of the sample during assessments of Option 2 producers. The composition of the sample shall reflect the percentage of family farms in the group. Example: A producer group has 100 members that register for GRASP. Twenty farms have no employees. The CB takes the square root sample of 10 producers; two producers must be without employees.
- g) If the external assessment of the sample of producer group members reveals major differences between the results of the internal and external inspection, this must be mentioned in the Remarks/Comments of the GRASP Checklist per relevant control point. Major differences could indicate that there is a serious fault in the internal inspection results.

Example:

The internal assessment results of a producer for Question 1 state that the producer is fully compliant whilst the external inspection shows that the producer is not compliant. In this case the producer group needs to be re-assessed after a time frame of three months and it shall be noted in the checklist if corrective actions have been taken.

In the GRASP Checklist only the externally assessed members' results are uploaded by the CB.


- h) All producer group members, sites and units under IFA certification shall be registered for GRASP and considered for the sampling in the GRASP assessment. This means that the CB assessment will include the QMS, the square root of the number of PHUs in the case of FV and all PHUs in case of AQ and the minimum square root sample of all accepted producer group members. The sample shall be the same as the one selected for the IFA inspection. The transition period from the current rule (which does not require including each producer group member) to the new rule (which requires including all producer group members) is one year from the "valid to" date of the current GRASP assessment.

GRASP can be applied only to the entire production of the GLOBALG.A.P. registered company, including the producer group's own production. The group's own production cannot be assessed separately, but shall be counted as an additional member in the sample of the Option 2 producer group members 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.

After initial assessment, during subsequent assessment, the sample size may be divided between the IFA surveillance and IFA recertification inspections. In order to facilitate worker interviews, the

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	41 / 14
		Revision Number :	00
		Revision Date :	

timing of the assessment (and the distribution between surveillance and recertification visits) shall take into account the availability of the employees.

	<p>1. Internal assessment:</p> <ul style="list-style-type: none"> Use the GRASP Internal Checklist for Producer Groups to internally inspect all producer group members registered for GRASP. Keep the records of these inspections. The results of the internal inspections are aggregated in the GRASP Internal Checklist for Producer Groups. This checklist can be downloaded from the GLOBALG.A.P. website.
	<p>2. External assessment:</p> <ul style="list-style-type: none"> Use the GRASP Checklist to assess the square root sample of the producer group members registered for GRASP. Compare the results of the sample external assessments with the results of the internal assessments. If the results of the internal and external assessments match, complete the control point QMS on the efficiency of the group's quality management system. If there are major differences between the external and the internal assessment results, use the Remarks/Comments field to note the deviation.
	<p>3. Upload of the results to the GLOBALG.A.P. Database:</p> <p>Upload the completed GRASP Option 2 checklist with the external assessment results to the GLOBALG.A.P. Database.</p>

7.2.4 Product Handling Unit (PHU)

In internal assessments, all PHUs shall be assessed.

PHUs that are run by a producer group shall also be included in the sample of the external assessment. If there is only one central PHU, it shall be inspected every year. If there is more than one central PHU, the square root of the total number of central PHUs registered shall be inspected. For aquaculture, every PHU shall always be inspected annually.


If handling does not take place centrally, but on the production sites of each producer group member, this factor shall be taken into account, when determining the sample of producer group members to be inspected. If selected, the CB shall inspect the selected producer group members and its PHU together.

After initial assessment, during subsequent assessment, the sample size may be divided between the IFA surveillance and IFA recertification inspections. 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 employees.

In the production and the product handling unit different employees can be employed under different conditions, and the assessment results can also differ. The production unit can be fully compliant, whilst the assessment of the PHU shows non-compliances. The overall compliance shows one result for both the production and the product handling units. In such cases remarks shall explain the specific situation.

The following assessment rule applies: In every case, especially in Option 1 CB assessments, comments shall explain the various potential differences in employment conditions (production site vs. handling unit). Assessors shall describe which site(s) and unit(s) were assessed, as well as what was found and where (evidence and location of evidence, e.g. on site, office, subcontractor's office, etc.). Any non-compliances, no

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	42 / 14
		Revision Number :	00
		Revision Date :	

matter where found (field or PHU, subcontractor), shall be recorded in the “Remarks” field of the GRASP Checklist with reference to either the production site or the PHU and to the corrective actions, if applied.

(i) Subcontracted PHU(s)

If one CB has, in a product cycle, already assessed a subcontracted PHU, the other CB may accept the assessment result and does not need to reassess the PHU.

8 GRASP ASSESSORS QUALIFICATION REQUIREMENTS

GLOBALG.A.P. GRASP assessors are able to assess producers/producer groups once the CB in-house trainer (IHT) has verified factual evidence of their qualification and experience in social assessments or audits.

8.1 Formal Qualifications

For assessments of Options 1 and 3 multisites without a QMS, assessors must be approved GLOBALG.A.P. IFA inspectors.

For assessments of Options 1 and 3 multisites with a QMS, and for assessments of Options 2 and 4 producer groups with a QMS, the GLOBALG.A.P. IFA auditor qualification is required. The site and producer group member inspections can still be conducted by a GLOBALG.A.P. IFA inspector.

8.2 Technical Skills and Qualifications


8.2.1 In Countries Where GRASP NIGs Exist

- a) All inspectors who are set to assess GRASP must be registered as GLOBALG.A.P. Online Trainees and pass the GRASP online test in the GLOBALG.A.P. Database.
- b) Furthermore, the IHT has to provide GRASP in-house formal training(s) of at least 8 hours’ duration to new assessors for sign-off, including all the relevant criteria and supporting regulation outlined in the GRASP National Interpretation Guideline(s) (NIG) of the countries in which the CB performs GRASP assessments and demonstrate how the NIGs are included in the training program (documented with agenda, list of participants, certificate).
- c) Audit skills of the GRASP assessors shall also be verified through a witnessed audit by the IHT:
 - i. The GRASP assessor shall assess at least one Option 1 producer or Option 2 producer group member and one Option 2 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.

- d) The technical qualification requirements shall include the training of the local labor regulations related to the control points, and the ILO conventions ratified in the country in which the assessor will perform assessment. Training can be either as part of formal qualifications or through the successful completion of a formal course (the formal course may be an internal training by the in- house CB trainer). The training duration shall be a minimum of 8 hours. Duration and content shall be indicated on the evidence provided for this requirement (course certificate, evidence of training included in formal qualifications, etc.). This evidence shall be renewed every 3 years.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	43 / 14
		Revision Number :	00
		Revision Date :	

8.2.2 In Countries without GRASP National Interpretation Guidelines (no-NIG countries)

a) GRASP may be assessed by a GLOBALG.A.P. approved IFA auditor/inspector proving additional qualifications as detailed below

i. A training of the local labor regulations of the country without a NIG related to the control points, and the ILO conventions ratified in the country in which the assessor will perform assessment (including development, issues and legislative changes relevant to the compliance with GRASP in the countries in which the assessment shall be carried out). The training can be conducted either as part of formal qualification or through the successful completion of a formal course*.

or

ii. A minimum of 2 audits conducted in the country of application without a NIG as the lead auditor against a standard that includes a labor component.

and both for i. and ii.

- Provide a document with legislative reference to the GRASP requirements that are checked by the assessor during the GRASP assessment. This document shall be reviewed and approved by the IHT.
- This document shall be submitted with the application for GRASP assessments in a no-NIG country.
- Working language skills in the corresponding native/working language that is used for trainings and work instructions to the employees.

*A formal course can be:

a) part of the formal qualifications (degree/diploma) or certification that was awarded to the assessor. The assessor shall present the proof. If it was part of the degree/diploma, it shall be included in the syllabus. Alternatively, if it was acquired separately, there shall be a separate certificate of examination showing a course covering these issues.

b) an internal training by the IHT. The assessor shall present the proof of this training. If it was part of an internal training, the complete syllabus of the course shall be provided including the GRASP requirements, and exam and the certification of examination.


In both a) or b), the training or course duration shall account for a minimum of 8 hours for sign-off of new GRASP assessors. Duration and content shall be indicated on the evidence provided for this requirement.

b) GLOBALG.A.P. approved auditors and inspectors without the abovementioned qualifications may conduct the GRASP assessment with the support of a social auditor who is not an GLOBALG.A.P. approved inspector/auditor.

The social auditors need to provide proof of their qualifications to the GLOBALG.A.P. approved CB. These shall include all the following:

- A minimum of 2 social audits as lead auditor on labor issues in the country where the assessment will be conducted
- Provide a document with legislative reference to the GRASP requirements that are checked by the assessor during the GRASP assessment. This document shall be reviewed and approved by the IHT.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	44 / 14
		Revision Number :	00
		Revision Date :	

- “Working language” skills in the corresponding native/working language that is used for trainings and work instructions to the employees.

Registration in the GLOBALG.A.P. Database, CB in-house training on GRASP and the GRASP online training and test are still not required for these social auditors.

In case the CB submits applications for multiple countries without a NIG, the evidence shall be provided for each application.

8.3 Maintenance of Competency

The CB shall have a procedure in place to maintain knowledge and competency of the GLOBALG.A.P. auditors and inspectors.

a) Records

- i. Records of qualifications and trainings shall be maintained for all GRASP assessors.
- ii. Records of completed trainings, online trainings and passed exams offered by GLOBALG.A.P. shall be maintained.

b) Training by the in-house trainer

- i. The assessors shall undergo trainings and evaluation to ensure consistency in the approach and the interpretation of the GRASP Control Points.

c) Complete GRASP Online Training updates (as soon as available).

- d) The CB shall carry out a GRASP witness inspection or re-inspection for each of its GRASP assessors at least once every 4 years to verify competence.

- e) Systems shall be in place to demonstrate that the GRASP assessors are informed and aware of developments (e.g. NIGs), issues and legislative changes relevant to the risk assessment on social practice.

8.4 In-house Trainer

Before assessing GRASP, CBs need a GRASP in-house trainer responsible for qualification and maintenance of competency of all GRASP assessors.


- a) CBs already working with GRASP shall name a GRASP assessor to the GLOBALG.A.P. Secretariat who has fulfilled the GRASP assessor requirements in the past. CBs just starting with GRASP assessments shall name a person who then shall participate in the one-day in-house trainer training. This is an additional training for in-house trainers, they must also fulfill all other points for GRASP assessors as defined in point 6 above.

- b) The CB’s first in-house trainer is approved by the GLOBALG.A.P. Secretariat.

8.4.1 Key Tasks

- a) Set up a system to demonstrate that key staff is informed and aware of development, issues and legislative changes relevant to the compliance to the GRASP General Rules.
- b) To ensure qualification updates of the GRASP assessors as soon as Online Training updates and/or updates of the normative documents, GRASP NIGs, legislative changes are available.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	45 / 14
		Revision Number :	00
		Revision Date :	

- c) To witness at least one GRASP Option 1 producer or Option 2 producer group member and 1 Option 2 QMS audit before a GRASP assessor can be signed-off.

8.5 Internal Producer Group Inspector Qualifications

- a) Inspectors will be able to inspect GRASP once factual evidence (as described below) of their qualifications and experience has been verified by the producer group. The GLOBALG.A.P. CB shall audit compliance with the requirements as set out below during the external QMS audit.
- b) The relevant CB shall have a complete and current list of all the producer group's internal inspectors. The qualification of the internal inspectors shall be approved by the CBs during the external inspections.

8.5.1 Skills and Qualifications for Internal Producer Group Inspectors

- a) One-day practical inspection course setting out basic principles of inspections.
- b) Knowledge about and/or access to legal labor regulations.
- c) Knowledge of the GRASP NIG (as soon as available) of the respective country.
- d) "Working language" skills in the corresponding native/working language.

9 GRASP COMPLIANCE SYSTEM

9.1 Database Registration of the GRASP Add-on


- a) The first step in the GLOBALG.A.P. Database is the registration of the GRASP Add-on. This includes the selection of the currently valid GRASP Add-on scheme, the registration and the acceptance of the GRASP "product" under this scheme and the registration of the number of employees contracted by the applicant company. This procedure shall be completed in the GLOBALG.A.P. Database for Option 1 single producers, for Option 2 producer groups and for each participating Option 2 producer group member. For all relevant specifications please see 3. Application Options and 9.2. Definitions.

9.2 GRASP Assessment Results

The GRASP Add-on consists of different compliance levels based on a scoring system. The compliance level of each control point is calculated from the answers of the corresponding sub-control points in the GRASP Checklist. Compliance with one sub-control point means 100%, non-compliance means 0%. The overall compliance level is then calculated from the assessment results of each control point – taking into account all the applicable control points. The overall assessment result shows the GRASP compliance level of the producer/producer group.

- a) The results of the GRASP Assessment are only displayed in the GLOBALG.A.P. Database if a valid GLOBALG.A.P. primary production or equivalent benchmarked scheme/AMC certificate is at hand.
- b) There is an overall 5-level rating for compliance for each control point and the overall compliance level of the GRASP assessment:
- Fully compliant
 - Improvements needed
 - Not compliant, but some steps taken
 - Not compliant
 - Not applicable

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	46 / 14
		Revision Number :	00
		Revision Date :	

The compliance levels are calculated based on the table below:

Assessment result		Compliance Level
from	to	
> 99%	100%	Fully compliant
> 66%	≤99%	Improvements needed
> 32%	≤66%	Not compliant, but some steps taken
0%	≤32%	Not compliant

The overall compliance level of the GRASP assessment “Fully compliant” can be reached only if all applicable control points have been marked “Fully compliant”.

The overall compliance level “Improvements needed” can be reached only if no control point was marked as “Not compliant, but some steps taken” or “Not compliant”. If one or more control points are “Not compliant, but some steps taken” or “Not compliant”, the assessment result “Improvements needed” will be automatically downgraded to “Not compliant, but some steps taken”.

The GRASP result of the producer group is calculated automatically from the summary of the results from the external assessment and the result of the QMS Control Point on the effectiveness of the quality management system.

The last checklist question in the Option 2 checklist, the QMS question, can only be “Fully compliant” or “Not compliant”. In case of “Not compliant” for the QMS question the overall compliance level will be downgraded to “Not compliant”.

10.3 Corrective actions

The assessment results can also be uploaded to the GLOBALG.A.P. Database before the corrective actions have been taken – this depends on the producers’ decisions and/or on the GRASP Observers’ requirements. The final assessment result can then again be uploaded after the evidence of the corrective actions has been submitted.


Furthermore, there can be non-compliances that cannot be corrected in the same production period, but only for the following GRASP assessment. In this case the GRASP assessment result is uploaded with the non-compliances and the relevant comments explaining the scenario.

If corrective actions are required and the corrective action can be carried out, the same time period is set as in the GLOBALG.A.P. General Regulations – as detailed below. The assessment report shall be uploaded after the time for corrective actions has expired, regardless of whether the corrective actions have been taken.

10.3.1 Initial GRASP Assessment

In case of non-compliances, the producer has three months (or less, as agreed by the producer and CB) from the date of assessment to undertake corrective actions to rectify the situation before the final assessment results are uploaded to the GLOBALG.A.P. Database. The CB shall upload the GRASP Checklist within a maximum of 28 calendar days after closure of any outstanding non-compliances.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	47 / 14
		Revision Number :	00
		Revision Date :	

10.3.2 Subsequent GRASP Assessment

In case of non-compliances, the producer has 28 days (or less, as agreed by the producer and CB) from the date of assessment to undertake corrective actions to rectify the situation before the final assessment results are uploaded to the GLOBALG.A.P. Database.

Once the non-compliances are corrected, the corrected GRASP Checklist shall be uploaded to the GLOBALG.A.P. Database. The CB shall upload the GRASP Checklist within a maximum of 28 calendar days after closure of any outstanding non-compliances.

If the non-compliances are not corrected, the GRASP Checklist with all non-compliances, outstanding corrective actions and respective remarks shall be uploaded to the GLOBALG.A.P. Database. This is then the final assessment report, which is also issued by the CB to the producer/producer group as the Proof of Assessment.

10.3.3 Unannounced Surveillance Inspections

The GRASP Add-on program does not require that producers receive unannounced surveillance inspections.

10.4 Cancellation Regarding the Conformance with GRASP

a) A cancellation of the contract GRASP shall be issued if:

- i. The CB finds evidence of fraud and/or lack of trust to comply with the GRASP requirements, or
- ii. There is a contractual non-conformance.

The CB may report findings of serious fraud or breaches of legal requirements/crimes detected to the responsible local/national authorities.

b) A cancellation of the contract will result in the total prohibition (all products, all sites) of the use of the GRASP Proof of Assessment and any device or document that may be linked to the GRASP Add-on.

c) A producer who has received a cancellation shall not be accepted for the GRASP Add-on assessment for the period of 12 months after the date of cancellation.

d) In this case, the basic GLOBALG.A.P. primary production audit may also be affected, depending on the reason of the suspension.

10.5 Notification and Appeals

The producer shall either resolve the non-conformances communicated or appeal to the CB in writing against the non-conformances, explaining the reasons for the appeal.


10.6 Sanctioning of Certification Bodies

GLOBALG.A.P. reserves the right to sanction CBs based on evidence of not following procedures or clauses of the Certification and License Agreement signed between GLOBALG.A.P. and the CB.

10.6.1 GRASP Report Not Uploaded

The GRASP General Rules require the upload of the report within a maximum of 28 days after the time period for corrective actions has expired (within 3 months after initial assessment or 28 days after subsequent

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	48 / 14
		Revision Number :	00
		Revision Date :	

assessment). If a CB does not follow this rule (i.e. uploads the GRASP Checklist after this time frame), the GLOBALG.A.P. Secretariat shall impose a fine of EURO 150 per GGN on the CB. This non-conformance is also included in the CB's KPI.

10.6.2 GRASP Assessment Conducted Without Prior Approval - with Reference to 6.2.2

If a GRASP assessor has conducted a GRASP assessment in a no-NIG country without having been approved via the formal application procedure, the following sanctions apply:

- That GRASP assessment is invalid and canceled.
- The GLOBALG.A.P. Secretariat imposes a fine of EURO 500 on the CB.
- The CB shall submit the regular application form for GRASP assessments without a NIG according to the GRASP General Rules v1.3-1-i, Chapter 6.2.2.
- The company shall be re-assessed, and the database updated accordingly.
- The case is included in the CB KPI.

10.7 Proof of Assessment and Inspection Cycle

- a) The Proof of Assessment may only be issued if the producer has a valid certificate for a GLOBALG.A.P. or for an equivalent benchmarked scheme/AMC.
- b) A Proof of Assessment is not transferable from one legal entity to another.
- c) The inspection approval cycle is 12 months subject to any sanctions and extensions in accordance with the scope described.

10.7.1 Proof of Assessment Information

- a) The Proof of Assessment issued by the CB must conform to the available template.
- b) Date of Assessment: The date when the CB has assessed the producer. The same date is also entered if non-conformances have been detected.
- c) Valid from:
 - i. Initial Inspection: The initial date of validity is the date of assessment.
 - ii. Subsequent Inspections: The valid from date is linked to the GLOBALG.A.P. Standard or equivalent benchmarked scheme/AMC certificate cycle as soon as it is implemented.
- d) Valid to:
 - i. This date is always linked to the GLOBALG.A.P. Standard or equivalent benchmarked scheme/AMC certificate cycle as soon as it is implemented.

10.7.2 Maintenance of the Proof of Assessment

The registration of the producer with the GRASP Add-on must be re-confirmed with the CB annually before the expiry date.

PREPARED BY	APPROVED BY



Document Name: GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Document Number :	RH 03
	Publish Date :	03.03.2021
	Page Number :	49 / 14
	Revision Number :	00
	Revision Date :	

10.8 Certification Integrity Program (CIPRO)

From 2015 GRASP is included in the GLOBALG.A.P. Integrity Program (IPRO). The Certification Integrity Program (CIPRO) is risk-based and consists of two kinds of assessments:

- i. Office assessments to check CB certification performance
- ii. Producer assessments or witness CB assessments to check CB assessment performance

10.8.1 Integrity Program

For the GRASP Integrity Program the same rules apply as set for the Integrity Program in the current valid GLOBALG.A.P. General Regulations.

11 DECISION MAKING/GOVERNANCE

Any decision on GRASP is under the final responsibility of the GLOBALG.A.P. Board. An elected GRASP Technical Committee is responsible for all technical issues concerning the GRASP CPCCs, the NIGs and all other GRASP Tools. For further details see the Terms of Reference of the GRASP Technical Committee.


12 ABBREVIATIONS & DEFINITION OF TERMS

12.1 Abbreviations

These abbreviations apply to this and all other GRASP-related documents:

GRASP	GLOBLAG.A.P. Risk Assessment on Social Practice
AMC	Approved Modified Checklist
CB	Certification Body
CC	Compliance Criteria
CL	Checklist
CoC	Chain of Custody
CP	Control Point
CPCC	Control Points and Compliance Criteria
FAQs	Frequently Asked Questions
GLN	Global Location Number
GGN	GLOBALG.A.P. Number
GR	General Regulations; in GRASP General Rules
IHT	In-house Trainer
ILO	International Labor Organization
NIG	National Interpretation Guideline
NTWG	National Technical Working Group
PHU	Product Handling Unit
QMS	Quality Management System
SHC	Stakeholder Committee

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	50 / 14
		Revision Number :	00
		Revision Date :	

9.2 Definitions

For the application of the GRASP Module, the terms below are defined as follows. These definitions apply to this and all other GRASP-related documents:

Core Family Members: Core family members are defined as those relatives who are related in direct line to the producer (this does not apply for employed managers) and live in the same household as the producer. It may include parents, spouses, brothers/sisters and children, but does not include aunts/uncles, cousins or other relatives.

Employee: Employees are remunerated for the agricultural production services and/or production-related services (e.g. staff preparing meals for employees) they provide to a producer. This includes permanent, casual and seasonal workers as well as apprentices and subcontractors (hired labor) that are handling the product. It may exclude the core family members of the producer. In case producers have no employees during any time of the year, they have to provide an according self-declaration and GRASP becomes not applicable.

Employees' Representative: An employees' representation facilitates the dialogue among the employees, but also between the employees and the management. Problems on the farm can easily be addressed, discussed and solved. Furthermore, the employees' council or representative(s) can act as mediator in case of conflicts. Agreements with the employees' representative will generally be well accepted within the workforce, as the representative(s) of the employees have negotiated the terms. Employees' representatives have to be part of the workforce – if they are part of the management team, the control point is not compliant.

Certification Bodies may distribute it to their auditors, employees and clients and it is free to download on the GLOBALG.A.P. website and in the CB extranet.


(Company) Management: The term “management” is used to describe the person or persons operationally responsible for the production and employees. The producer might employ the management – in that case the person or persons will also be treated as normal employees.

Producer: A person (individual) or business (individual or producer group) with a registered legal entity owning the production, relevant to the scope of GRASP (certified to a GLOBALG.A.P. Standard), who has the legal responsibility for the products sold by that farming business. A GLOBALG.A.P. Number (GGN), as specified in the valid GLOBALG.A.P. General Regulations identifies each producer. A producer can apply for GRASP together with the GLOBALG.A.P. primary production audit following the application procedure set in the valid GLOBALG.A.P. General Regulations and these GRASP General Rules.

Subcontractors: Subcontractor of any tier: Based on the definition of “subcontractor” provided in the GLOBALG.A.P. General Regulations v5.2 and v5.3-GFS Part I, Annex I.4 Definitions, GRASP subcontractors are those entities furnishing labor, equipment, and/or materials to perform specific farm operation(s) under contract with the producer, directly or indirectly related to the Integrated Farm Assurance (IFA) standard. Examples of directly related activities might be spraying and picking of fruit, while indirectly related activities might be kitchen staff cooking meals for the workers.

Further clarifications on assessing the Control Points can be found in the GRASP FAQs.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	51 / 14
		Revision Number :	00
		Revision Date :	

Annex I: Terms of Reference for the Development of GRASP National Interpretation Guidelines

The purpose of these Terms of Reference is to assure the responsibility for the development and the regular update of the GRASP National Interpretation Guidelines and make the procedure transparent. This document shall be sent to the GLOBALG.A.P. Secretariat.

1. Preamble

- a) GRASP can be used in every country where a GLOBALG.A.P. primary production or equivalent benchmarked scheme/AMC certificate can be issued.
- b) GRASP National Interpretation Guidelines (NIGs) are a requirement.
- c) There are additional requirements for using GRASP in countries without NIGs, which have to be evaluated by the GLOBALG.A.P. Secretariat and followed by the Certification Bodies. These requirements are explained in the GRASP General Rules in Chapters 4.4.3 and 6.2.2.
- d) Where NIGs are being developed:
 - The GRASP NIGs provide guidance to implementers and assessors on the respective legal framework.
 - GRASP NIGs shall be discussed and backed up by a group of interested and knowledgeable local stakeholders.
 - This group shall be active and take ownership of the NIGs.
 - The group or a knowledgeable person (e.g. National Technical Working Group (NTWG), a GLOBALG.A.P. member) identified and assigned by the group will review the NIGs.

2. Responsibilities

In countries where there is a GLOBALG.A.P. NTWG, this working group should be responsible for developing the GRASP NIGs. In countries where there is no GLOBALG.A.P. NTWG or where the NTWG does not plan to develop the GRASP NIGs, the responsibility of the development and the regular update of the National Interpretation Guidelines must be with a GLOBALG.A.P. member company that signs up to be responsible for the development process (e.g. a GLOBALG.A.P. finally approved CB, a supplier). GLOBALG.A.P. reserves the right to change, update or withdraw the National Interpretation Guidelines at any time, if necessary.


The development and approval of the guidelines have to follow the defined minimum procedure (see point 3). The main goal of this procedure is to involve relevant local stakeholders and to ensure transparency of the development process. The GLOBALG.A.P. Secretariat will, together with the GRASP SHC, assess whether the development of the GRASP National Interpretation Guidelines follow this procedure. After a subsequent public consultation by the GRASP Observers as well as the GRASP SHC, and finalization by the NTWG or responsible group, the GLOBALG.A.P. Secretariat will publish the document on the GLOBALG.A.P. website.

3. Approval Procedure of GRASP National Interpretation Guidelines

3.1 Information of GLOBALG.A.P. Secretariat and Project Planning

The GLOBALG.A.P. Secretariat must be informed about the plan to develop GRASP NIGs. The applicant must provide GLOBALG.A.P. with a project plan outlining the planned development process. The GLOBALG.A.P.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	52 / 14
		Revision Number :	00
		Revision Date :	

Secretariat has to agree to the proposed process and reserves the right to adapt it. The GLOBALG.A.P. Secretariat informs the GRASP SHC about all plans for developing NIGs.

3.2 Preparation of Draft Version of the National Interpretation Guidelines

A local labor law expert (or group of experts) shall draft a first version of the interpretation guidelines, providing local interpretations for each of the 13 control points, where necessary. These interpretations shall not give examples for implementation – but rather compile and explain applicable regulations or collective bargaining agreements (e.g. minimum wage, links to resources). The DRAFT NIGs must be shared with the GLOBALG.A.P. Secretariat before discussing them in the local stakeholder workshop.

3.3 Stakeholder Consultation

These DRAFT NIGs shall then be presented to and discussed by a representative group of local stakeholders. The stakeholders shall include, if possible, representatives from the following interest groups:

- Civil society: e.g. consumer organizations, non-governmental organizations
- Relevant labor unions (local, regional, different sectors)
- (Local) government representatives/public sector
- Producers, producer organizations, export organizations
- GLOBALG.A.P. Retail and Food Service members
- Others

The goal of the stakeholder consultation is to reach consensus and approval of the document by the stakeholders. The stakeholder consultation should take place in a facilitated one-day workshop. The workshop and its results shall be documented in a report and shared with all workshop participants.

If a physical stakeholder round table is not feasible, due to justifiable reasons (evidence must be provided to the GLOBALG.A.P. Secretariat) consultation by written correspondence is possible. In this case the initiator of the process shall ensure transparency of the process to all the relevant stakeholders. All comments received must be filed and made available on request. The main interest groups named above shall be asked to provide their feedback on the National Interpretation Guidelines.


3.4 Publication of the GRASP National Interpretation Guidelines

The revised GRASP NIGs shall be forwarded to the GLOBALG.A.P. Secretariat. The documentation of steps one to three shall be made available. The interpretation shall be translated into English. The GLOBALG.A.P. Secretariat shall forward the developed NIGs to the GRASP Stakeholder Committee for feedback and to all GRASP Observers for public consultation. After the consultation period of three weeks, the GLOBALG.A.P. Secretariat shall send all comments received to the developing stakeholder group/responsible person. After any corrections/modifications of the document, the GLOBALG.A.P. Secretariat shall finalize and publish it on the GLOBALG.A.P. website. All members and CBs are then informed that the GRASP Module can from then on be assessed with NIGs in the respective country.

3.5 Validity/Update of the Document

The GRASP NIGs have a maximum validity of 4 years. They must be reviewed by the developing stakeholder group (e.g. NTWG or another responsible organization) at least once a year. The revision of the NIGs must follow a certain procedure ensuring that local stakeholders have been informed and involved. If NIGs have been found to challenge the global integrity of the standard, GLOBALG.A.P. reserves the right to withdraw or revise the NIGs in consultation with the developing stakeholder group.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	53 / 14
		Revision Number :	00
		Revision Date :	

We hereby declare our agreement to the above-mentioned Terms of Reference for developing the GRASP National Interpretation Guidelines:


For the country

Group responsible

Date/place

Signature

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	54 / 14
		Revision Number :	00
		Revision Date :	

Annex II: Data Use

The CB shall record the following data and the GLOBALG.A.P. Database shall be updated accordingly (as required in the current database manual):

- Company and location information
- Responsible person(s) of the company data
- Product information (i.e. number of employees)

This information shall be updated regularly whenever there is a change. It shall be updated at the latest with the re-acceptance of GRASP as a product for the next certificate cycle and/or the re-certification.


Unless indicated to the contrary by the producer or producer group, level a) is automatically chosen:

- a) The GGN/GLN, registration no., scheme, version, option, CB, products and status, product handling/processing declaration, number of producers (in Option 2), country of production and destination are made available to the public.
- b) GLOBALG.A.P. members and other industry market participants with authorized database access (the GRASP Observers) are allowed to see producer or producer group's organization name, city and postal code and the proof of assessment including the following information:
 - The GGN
 - CB Registration no.
 - Version of GRASP Module
 - Certification option
 - Certification Body
 - Upload date
 - Status: "GRASP assessed"
 - Product handling declaration
 - Number of producers covered by GRASP per product (in Option 2)
 - Option 1/2: GRASP Compliance Level (overall and per control point)
 - Assessment results per Control Point with remarks as in Annex I
 - For Option 2: As in Annex II: GGNs of the producers.
- c) GLOBALG.A.P. and the CB the producer or producer group is working with, can use all data in the GLOBALG.A.P. Database for internal purposes and sanctioning procedures.

The level of data visibility must be fixed and signed during registration with the CB. The producer or producer group is the data owner and is responsible for determining and granting the level of rights for data access. The data owner, however, can transfer the responsibility to other users (e.g. the CB, producer group as described in the current GLOBALG.A.P. General Regulations).

Therefore, a CB or producer group can perform the database registration, if the producer or producer group has assigned them the according rights in writing.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	55 / 14
		Revision Number :	00
		Revision Date :	

Annex III: Rules for the Use of the GRASP Logo and the GRASP Assessment Results

1. GRASP Logo

GLOBALG.A.P. is the owner of the GRASP logo, the “hand” in blue and in all colors.


The CB is expected to verify the correct use of the GRASP logo at the companies/on all sites at all times. Infringement of these rules could lead to sanctions.

- i. GRASP assessed producers and producer groups may use the GRASP logo in business-to- business communication.
- ii. GLOBALG.A.P. Retailer, Supplier and Associate Members can use the GRASP logo in promotional print-outs, flyers, hardware and electronic displays and in business-to-business communication.
- iii. GLOBALG.A.P. finally approved Certification Bodies can use the GRASP logo in promotional material directly linked to their GRASP activities in business-to-business communication and on the GRASP Proof of Assessments they issue.
- iv. The GRASP logo shall never appear on pallets, the product, consumer packaging of products intended for human consumption, nor at the point of sale where in direct connection with single products.
- v. The GRASP logo shall never be used on promotional items, apparel items or accessories of any kind, bags of any kind or personal care items, or in connection with retail store services.
- vi. The GRASP logo shall always be obtained from the GLOBALG.A.P. Secretariat.

2. GRASP Assessment Results

- i. The GRASP assessment conducted and the Proof of Assessment issued by the GLOBALG.A.P. and GRASP approved CB entitles the producer/company to use the GRASP assessment status (“assessed” or “GRASP assessed”), to communicate the compliance level or to distribute the Proof of Assessment including the completed GRASP Checklist for marketing purposes in promotional print-outs, flyers and the own website.
- ii. The GRASP assessed producer shall not alter, modify, or distort the GRASP Proof of Assessment.
- iii. GRASP Observers requiring GRASP assessment must always verify the GRASP assessment results in the GLOBALG.A.P. Database. The Proof of Assessment is only valid if the database contains the same assessment data and checklist details (in combination with a valid GLOBALG.A.P. or an equivalent benchmarked scheme/AMC certificate).
- iv. Any communication that producers wish to publish in relation to their GRASP assessment shall be sent beforehand to the GLOBALG.A.P. Secretariat for review and approval.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	56 / 14
		Revision Number :	00
		Revision Date :	

Annex IV: GLOBALG.A.P. Risk Assessment on Social Practice – Proof of Assessment



GGN: xxxxxxxxxxxxxxxxxxxxxx
 Registration number of producer/
 producer group (from CB) xxxxxx

**GLOBALG.A.P. RISK ASSESSMENT ON SOCIAL PRACTICE
(GRASP)**

**PROOF OF ASSESSMENT
According to
GRASP General Rules V1.3 July 2015**

Option X¹

Issued to
 Producer Group “Pimiento del Sur”
 Street, Place, Country

The Annex contains details of the GRASP results (and the covered producer group members.²)

The Certification Body [Company Name] declares that the producer group mentioned on this proof has been assessed according to the GLOBALG.A.P. Risk Assessment on Social Practice Version 1.3 July 2015. GLOBALG.A.P.-certified products covered by GRASP³

Products ³	Assessment number ⁴	Product handling	Remote assessment	Employee interview	No. of GRASP internally assessed producers ⁵	Total number of producers
Product 1	00012-ABCDE-0003	Yes	No	Yes	10	10
Product 2	00034-FGHIJ-0003	Yes	No	Yes	15	20
Total:					20	25

- Remote assessment⁹:
- Employee interview⁹:
- Overall compliance level:
- QMS result⁶:
- Assessment result in detail:

The actual status of this proof is constantly displayed at: <https://database.globalgap.org>

Date of Assessment: xx.xx.2015
 Date of Upload: xx.xx.2015
 Validity Date: xx.xx.2016 (depending on GLOBALG.A.P. certificate validity)

- Control Point 1: Fully compliant.*
- Control Point 2: Fully compliant.*
- Control Point 3: Improvements needed.*
- Control Point 4: Fully compliant.*

PREPARED BY	APPROVED BY



GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Document Name:	Document Number :	RH 03
	Publish Date :	03.03.2021	
	Page Number :	57 / 14	
	Revision Number :	00	
	Revision Date :		

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

**ANNEX 1 for GGN xxxxxxxxxxxxxxxx
Checklist⁷**

**ANNEX 2 for GGN xxxxxxxxxxxxxxxx
Producer Group Members⁸:**


Product(s) ³	GLOBALG.A.P. Number (GGN)	Company/producer name and address
Product a	xxxxxxxxxxxxxxxxxx	Producer 1
Product n	xxxxxxxxxxxxxxxxxx	Producer n

Notes

The proof of assessment shall be in English. You may add a second language in the proof.

- ¹ Option (1-2) must always appear on the proof of assessment.
- ² Second part “and the producer group members covered by GRASP” only applicable for producer groups.
- ³ Listing of products only applicable in case of Option 2 (producer group). In case of Option 1 the proof is not product specific.
- ⁴ Assessment Number is a number equivalent to the Certification Number. The Assessment Number shall be printed on the paper certificate. It is a reference code to the certificate in the GLOBALG.A.P. Database per product and certificate cycle. The GLOBALG.A.P. Certificate Number is generated automatically in the system and consists of 5 digits, 5 letters and a suffix (#####-ABCDE-#####). All changes to the certificate in a given certificate cycle are reflected in the suffix.
- ⁵ All internally assessed producer group members have to be accepted in the GLOBALG.A.P. Database. The total number of accepted members shall be printed here.
- ⁶ Applicable only for option 2 producer groups and Option 1 multisite with QMS.
- ⁷ The completed GRASP Checklist shall be available in the Annex 1.
- ⁸ The list of producer group members shall be included in the Annex 2. In Option 1 multisite there will be a list of sites.
- ⁹ Only visible in Option 1 assessments.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	58 / 14
		Revision Number :	00
		Revision Date :	

Annex V: GRASP Country Risk Classification Concept

The GLOBALG.A.P. Secretariat has decided to include the concept of country risk levels as a core system of the application of GRASP.

Explanatory Preface

To date, there exists no reference point in the form of a single national score, index or ranking directly related to levels of agricultural labor risks by country. Therefore, GLOBALG.A.P. has decided to classify country risk levels using the Worldwide Governance Indicators (WGIs) developed and maintained by the World Bank.

1. The World Bank's Worldwide Governance Indicators

For over 200 countries, the WGI project reports governance indicators, produced by the analysis of publicly available data sources, NGOs, international organizations, survey institutes and private-sector firms. It takes this data and transforms it into quantitative variables, aggregates those variables, and provides analysis on a country-by-country basis. In this context, the indicators provide information about the institutions and authority within a country, its stability, citizen participation and the prevalence of corruption. GLOBALG.A.P. will use the final ranking report, which lists countries with a final overall ranking from 1 to 100.

For more details in the calculation of the index, the ranking report, and changes in the methodology, please refer to <https://info.worldbank.org/governance/wgi/>.

2. Definition of the GLOBALG.A.P. Risk Levels

Depending on a country's overall ranking, GLOBALG.A.P. has grouped countries into three different levels: low-risk, medium-risk and high-risk countries.

To calculate the range for each level of risk, the following mathematical method was applied: Under the assumption that the WGI are statistically normally distributed, the mean of all the indicators was calculated.

As a result, an overall ranking of 50 was found. It is assumed that countries with a ranking between 0 and 50 were riskier than those with a ranking between 50 and 100. (Since lower rankings mean less governance as defined by the WGI). The mean ranking of less risky countries (i.e. countries with rankings between 60 and 100) was calculated. As a result, an overall ranking of 80 was found.

Based on these means, each level of risk was assigned a range in the ranking: rankings between 0 and 49 are considered high-risk, rankings between 50 and 79 medium-risk, and rankings between 80 and 100 low-risk. Therefore, countries in each range are assigned the corresponding level of risk.


The current list of countries with the level of risk is available on the GLOBALG.A.P. GRASP [website](#).

3. General

The GRASP Country Risk Classification (GRASP CRC) will serve as the main reference document for current and upcoming changes in the GRASP concept. Reference will always be made to this document.

- a) The GRASP Country Risk Classification will be based on the latest Worldwide Governance Indicators (WGIs) developed by the World Bank (see Explanatory Preface and section 1 at the beginning of this document).
- b) Due to the limited scope of some topics in the WGIs, the GLOBALG.A.P. Secretariat will be advised by the GRASP Technical Committee to use other sources of information to complement the GRASP CRC.
- c) The use of the GRASP CRC is mandatory for the CBs and assessors assessing GRASP worldwide.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	59 / 14
		Revision Number :	00
		Revision Date :	

3.1 Application

The GRASP CRC will classify countries in three different categories:

- a) High-risk countries: Countries with a WGI rating between 0 and 49
- b) Medium-risk countries: Countries with a WGI rating between 50 and 79
- c) Low-risk countries: Countries with a WGI rating between 80 and 100

3.2 Publication

- a) The GRASP CRC will be reviewed every year by the GLOBALG.A.P. Secretariat based on the most recent WGI publication.
- b) After revision, the GRASP CRC will be communicated in a timely manner to all CBs by the GLOBALG.A.P. Secretariat.
- c) The application of the rules derived from the GRASP CRC to a specific farm, geographic region or country can be modified by the GLOBALG.A.P. Secretariat through the advice of the GRASP Technical Committee.

4. Assessment Methodology

GRASP assessors shall use the following assessment methods for collecting evidence of compliance: interviews, document review and visual inspection during the GRASP assessments. Interviews shall be conducted with the management or its representative(s), employees' representative(s), trade union representative(s) if working at the farm and present during assessment, and a sample of the employees present during the assessment.

4.1 Assessment Methodology and Presence of Employees by Country Risk Classification

The method of collecting evidence shall follow the rules indicated in this document. Any non-conformance to these rules shall result in sanctions as indicated in the current GLOBALG.A.P. General Regulations v5.2 Part III, 8 "Certification Body Sanctions".

The application of the country risk profile rules requires the presence of employees on the day of the GRASP assessment in following cases:

- **Low-risk country:** Requires the presence of employees at farms only if interviews are requested by producer
- **Medium-risk country:** Requires the presence of employees at the farms
- **High-risk country:** Requires the presence of employees at the farms


The list of countries assigned to the three categories is available on the GLOBALG.A.P. website and will be updated regularly – following the revision periods of the World Bank.

CBs shall inform, in advance, producers and producer groups seeking GRASP assessment about which case applies, i.e. whether employees need to be present at the farm.

In Option 1 and 3, the absence of employees where employee interviews are required or requested and this requirement is communicated, shall result in an immediate GRASP assessment rescheduling. The producer shall bear the responsibility and cost arising from such rescheduling. This also applies for Options 1 and 3 multisite with QMS.

In Option 2 and Option 4 producer groups, the absence of employees in the farm sample shall be considered a lack of necessary controls in the QMS functions (5.2.3 b). This shall not apply to producer group members indicated in 5.2.3 f (producer without employees) or if employees are shared among producer group members or the PHU. If employees are shared in any operation, evidence of the various conditions of employment shall be checked.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	60 / 14
		Revision Number :	00
		Revision Date :	

4.2 Guidance for Application of Methods by Country Risk Classification

4.2.1 Low-Risk Countries

In low-risk countries the GRASP assessors shall conduct:


- a) Interview with the management (or its representative(s)) and the person responsible for GRASP implementation on the farm
- b) Interview with the GRASP employees' representative(s) of the farm
- c) Interview with the trade union representative(s), if working at the assessed farm and present during the assessment. If this situation applies, please include this in the field "EMPLOYEES' REPRESENTATIVE" in section 3 of the master data "Presence During the Assessment" in the GRASP Checklist.
- d) Group interview(s) with a sample of employees of the farm only if
 - i. requested by the producer (producer shall have arranged prior to the assessment that employees are present and available for interviews) or
 - ii. the assessor considers it necessary to keep the credibility of the assessment and employees other than the employees' representative(s) are present on the farm during the assessment.
- e) Document review of the employees who were interviewed and who are considered for document sampling based on the rules in this document
- f) Document review related to farm operations (as indicated in the checklist)

4.2.2 Medium-Risk Countries

In medium-risk countries the GRASP assessors shall conduct:

- a) Interview with the management (or its representative(s)) and the person who is responsible for GRASP implementation on the farm
- b) Interview with the GRASP employees' representative(s) of the farm
- c) Interview with the trade union representative(s), if working at the assessed farm and present during the assessment. If this situation applies, please include this in the field "EMPLOYEES' REPRESENTATIVE" in section 3 of the master data "Presence During the Assessment" in the GRASP Checklist.
- d) Group interview(s) with a sample of employees of the farm
 - Individual employee interviews shall be conducted whenever group interviews are not appropriate (due to specific conditions, e.g. related to culture, gender, religion). This shall be indicated in the remarks of the respective control point in which interviews are required.
- e) Document review of the employees who were interviewed and who are considered for document sampling based on the rules in this document.
- f) Document review related to farm operations (as indicated in the checklist)

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	61 / 14
		Revision Number :	00
		Revision Date :	

4.2.3 High-Risk Countries

In high-risk countries the GRASP assessors shall conduct:

- a) Interview with the management (or its representative(s)) and the person who is responsible for GRASP implementation on the farm
- b) Interview with the GRASP employees' representative(s) of the farm
- c) Interview with the trade union representative(s), if working at the assessed farm and present during the assessment. If this scenario applies, please include this in the field "EMPLOYEES' REPRESENTATIVE" in section 3 of the master data "Presence During the Assessment" in the GRASP Checklist.
- d) A combination of individual and group interview(s) with a sample of employees of the farm
- e) Document review of the employees who were interviewed and who are considered for document sampling based on the rules in this document
- f) Document review related to farm operations (as indicated in the checklist)

5. Sample Size Calculation

5.1 Sample Size for Employee Interviews in Option 1 and 3 (without QMS)

The sample size for employee interviews shall be


- a) For producers in low-risk countries with interviews: **50% of the square root of the number of employees present** on the farm during the assessment
- b) For producers in medium-risk countries: **the square root of the number of employees present** on the farm during the assessment
- c) For producers in high-risk countries: **the square root of the number of employees who are present** on the farm during the assessment

5.2 Sample Size for Employee Interviews in Option 2 and 4/Option 1 and 3 with the implementation of a QMS

The sample size for employee interviews shall be

- a) For producer groups or multisite operations with QMS in low-risk countries who request interviews: **50% of the square root of the number of employees present** on the farm during the assessment, out of all producer group members/sites who were included in the external assessment.
- b) For producer groups or multisite operations with QMS in medium-risk countries: **the square root of the number of employees present** on the farm during the assessment, out of all producer group members/sites who were included in the external assessment.
- c) For producer groups or multisite operations with QMS in high-risk countries: **the square root of the number of employees who are present** on the farm during the assessment, out of all producer group members/sites who were included in the external assessment.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	62 / 14
		Revision Number :	00
		Revision Date :	

5.2.1 Sampling Cascade

The sampling follows a **cascade**:

The group has 100 producer group members with 1,500 employees.

- a) For the external GRASP assessment, the assessor selects the square root of the members:
10 producers are included with 150 employees.
- b) The assessment focus is on these 150 employees.
- c) As a last step, for the interview and document sampling, the assessor checks **how many of these 150 will be/are present on the day of the assessment.**

In case product handling is included in the IFA certification scope, subcontracted product handling shall be covered by GRASP. The sample of the PHU employees is calculated the same way: by creating the square root from all PHUs together.

5.2.2 Sampling


The 8 producer group members have registered 73 employees in total: 17 permanent (10 national, 7 foreign nationals), 56 temporary (43 foreign nationals, 13 national), and no subcontracted employees.

The producer group has 2 central PHUs: one own PHU with 10 permanent (all national) and 64 temporary employees (25 national and 39 foreign nationals), 74 in total; and one subcontracted PHU with 11 permanent employees (all national) and 75 temporary employees (27 national, 48 foreign national), 86 in total.

On the day of the GRASP assessment, employees in the following categories are present:

- a) On the 8 farms: 12 permanent (8 national, 4 foreign national), 30 temporary (all foreign national), 42 in total.
- b) In the central PHU: 10 permanent (all national) and 60 temporary (40 national, 20 foreign national), 70 in total.
- c) In the subcontracted PHU: 7 permanent (all national) and 53 temporary (17 national, 36 foreign national), 60 in total.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	63 / 14
		Revision Number :	00
		Revision Date :	

5.2.3 Interview Sample Size (Medium- and High-Risk Countries)

- a) Count the employees who are present during assessment
- i. Summary of field employees of all 8 producer members: 42, square root is 7.
 - ii. Employees in the own central PHU plus employees in the subcontracted PHU (present on the day of the GRASP assessment): sample can be calculated by creating the square root from both PHUs together. In this case, CB shall consider for employee interviews employees from the PHUs in the sample (in this case, 2): 130, square root is 12.
- b) Classification of employees for a. and b.

	No. of employees on day of assessment		Distribution		Sample	
	National	Foreign national	National	Foreign national	National	Foreign national
Production						
Permanent	8	4	19%	10%	2 (1)	1
Temporary		30		72%		4 (5)
Subcontracted						

	No. of employees on day of assessment		Distribution		Sample	
	National	Foreign national	National	Foreign national	National	Foreign national
Handling						
Permanent	10		8%		1	
Temporary	40	20	31%	16%	4	2
Subcontracted	24	36	19%	28%	2	3

PREPARED BY	APPROVED BY



Document Name: GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Document Number :	RH 03
	Publish Date :	03.03.2021
	Page Number :	64 / 14
	Revision Number :	00
	Revision Date :	

5.2.4 Registration in the GRASP Assessment Checklist

Following the total number of employees reported by the producer for the whole production year (see point 5.2.2. "Sampling," there are 233 employees with 86 employees of the subcontracted PHU. These employees are registered under "Agency." CBs fill in the table of employment in the GRASP Checklist as follows:

2. STRUCTURE OF EMPLOYMENT										
Month(s) of peak season (if applicable):										% of employees living in accommodation provided by the company (if applicable):
Nationalities of employees										
Total number of employees	Local			Cross-Border Migrants			National Migrants			Total
	Perma nent	Tempo rary	Agency	Perma nent	Tempo rary	Agency	Perma nent	Tempo rary	Agency	
in agricultural production	10	13		7	43					73
in product handling facility(ies)	10	25	38		39	48				160
Total	20	38	38	7	82	48				233

5.3 Sample Size for the Document Review of the Employees

The assessors shall review the documents of the employees included in the interview sample with the following variations:

- a) In high-, medium- and low-risk countries where interviews are conducted: At least 50% of those interviewed (i.e. 50% of the employees' documents who have been interviewed).
- b) In low-risk countries without interviews: At least 50% of the square root of the total number of employees registered in the field "Total" in section 2 of the master data "Structure of Employment" in the GRASP Checklist (requires regular updates as per GRASP General Rules Annex II: Data Use)


5.4 Composition of the Sample

5.4.1 General

In every sample the proportion in percentages shall be calculated: a percent is equal to an equivalent ratio.

The categories that shall be considered for the sampling are the type of employment and the migratory status. The type of employment includes permanent employees with a contract without termination, temporary

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	65 / 14
		Revision Number :	00
		Revision Date :	

employees with a contract for a defined period of time and subcontracted employees contracted via an agency/labor supplier.

The migratory status (i.e. legal status in the country) differentiates national vs. foreign national employees.

The definition of “national” includes employees with permanent residency for the country and household (plus family) and a permanent work permit, meaning that these employees do not migrate to work. Foreign national employees are those without permanent residency and household including family in that country, who migrate to work into another country.

- a) In each case, the samples shall include every type of employment (considering also the definitions in the GRASP General Rules Chapter 9) and migratory status (temporary/permanent/subcontracted and national/foreign national) that is present on the farm during the assessment.
- b) In any sample, the different types of employment present during the assessment shall be proportionally represented, considering also the above definitions and the migratory status of those employees who are present during the assessment.
- c) In low-risk countries without interviews, the sample shall proportionally represent (in percentages) the types of employment and migratory status of those employees who are registered in section 2 of the master data “Structure of Employment” in the GRASP Checklist.
- d) In high-, medium- and low-risk countries with interviews, the sample shall also consider interviewed producers in document reviews, allowing cross-checking evidence for the same topics with different methods.
- e) If subcontracted employees are present during assessment, they shall be available for the interviews, and be considered in the sampling. This shall be reported in the comments section of the GRASP Checklist.
- f) To cover all types of employment and the migratory status, the sample size shall be increased or amended as needed. Example: 4 employees are present, the sample size contains 2. However, if the 4 employees have 4 different kinds of contract and migratory status, the sample shall be extended to include all 4.

5.4.2 Employee Documents to be Reviewed


- a) The producer shall provide access to the documents of the employees who have been interviewed for assessment purposes.
- b) The following documents of the individual employees shall be reviewed:
 - i. Employees’ contracts (control point 5)
 - ii. Employees’ pay slips/pay register (control point 6)
 - Document(s) for the verification of the wages paid to employee (control point 7)
 - iii. Employees’ time record (control point 10)
 - In the report, the verification of hours and breaks of the employee (control point 11)

5.5 Examples

A farm has 102 subcontracted workers for harvest, 64 temporary workers and 19 permanent workers. Total number of employees is 185.

The assessor needs to check what proportion of employees are made up of national and foreign national employees.

PREPARED BY	APPROVED BY

	Document Name:		Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE		Publish Date :	03.03.2021
			Page Number :	66 / 14
			Revision Number :	00
			Revision Date :	

The assessor then calculates the percentage of all types of employment and the migratory status that results in the following matrix (with 0.5 or higher rounded up):

Type of employment	Employee distribution		Total	Percentage	
	Foreign national	National		Foreign national	National
Subcontracted	102		102	55%	
Temporary	40	24	64	22%	13%
Permanent		19	19		10%
Total employees (100%)	142	43	185	77%	23%

During the assessment, 160 employees are present, so the sample is the square root of 160 = 13 employees who are going to be interviewed. According to the percentages in the company, the following matrix shows the necessary sample:


Type of employment	Percentage in the company		Total sample	Sample distribution	
	Foreign national	National		Foreign national	National
Subcontracted	55%			7	
Temporary	22%	13%		3	2
Permanent		10%			1
Total sample			13	10	3

The sample distribution for the foreign national temporary employees shall include at least 3 interviewees – to ensure that the employees are represented in correct proportions. The assessor shall interview 10 foreign national employees – 7 subcontracted and 3 temporary employees – as well as 3 national employees – 2 with temporary contracts and 1 with a permanent one.

The assessor shall review the documents of 50% of this sample. In this example, half of the square root is 7:

Type of employment	Percentage rate		Total	Sample distribution	
	Foreign national	National		Foreign national	National
Subcontracted	55%			3	
Temporary	22%	13%		2	1
Permanent		10%			1
Total sample			7	5	2

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	67 / 14
		Revision Number :	00
		Revision Date :	

In the calculations of the sample, the assessor shall amend the sample in order to proportionally represent the percentages of the types of employment and migratory status. Thus, in this case, the larger sample of subcontracted foreign nationals was reduced in order to keep 1 permanent national and 1 temporary national employee in the sample.

6. Time Management

6.1 Expected Minimum Duration of Individual Interviews

Each individual interview shall last at least 15 minutes per person. Individual interviews shall be conducted with the management (or its representative(s)), with the person who is responsible for the implementation of GRASP, with the employees' representative(s), and with the trade union representative(s) – if the last is working at the farm and is present during the assessment.

If requested by the producer, the interview with the management (or its representative(s)) and the person who is responsible for the implementation of GRASP can be conducted as a group interview, provided:

- both are available at the same time for the interview
- the responsible person for the implementation of GRASP is part of management, not of the hired workforce.

If employees' representation consists of a council or a group of representatives, assessors shall apply the group interview methodology.

6.2 Expected Minimum Duration of Group Interviews

The minimum duration of group interviews depends on the number of people included in the sample, and certainly on the group dynamics.


(Employees) Sample size	Minimum duration of group interviews in minutes
1	15
2	20
3	40
4	
5	
6	
7	60
8	
9	
10	
10+	Divide the sample into groups and apply the minimum duration (limit group size to 10 people)

If there are more than 10 employees in a sample for group interviews, then the sample shall be divided, so that one interview session includes 10 employees and all others are grouped in subsequent sessions or so that all groups have fewer than 10 employees.

For example, the sample exists of 12 employees. The assessor can divide the sample into a session of 10 employees for 60 minutes and another session with 2 employees for 20 minutes. Alternatively, it can be divided into two sessions with 6 employees for 40 minutes.

In group interviews, the minimum duration of 60 minutes applies to the whole range of sample size, whether there are 7 or 10 employees in the group being interviewed.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	68 / 14
		Revision Number :	00
		Revision Date :	

6.3 Combination of Individual and Group Interviews (Applies Only in High-Risk Countries)

If interviews are conducted in a high-risk country on a farm with 42 or fewer employees ($\sqrt{42}=7$), the assessor shall always conduct individual interviews with the employees in the sample. Up to a sample size with 7 employees, individual interviews shall be conducted with each of the employees.

If the sample consists of more than 6+1 employees, group interview(s) shall be conducted with the rest of the sample, following the minimum duration as indicated below.

(Employees) Sample Size	Minimum interview duration in minutes
1	15
2	30
3	45
4	60
5	75
6	90
(Employees) Sample Size	Minimum interview duration in minutes
	Farms with 43 or more employees: assessor shall continue sampling using group interviews duration and methods
7	(6 individual) 90 minutes + (1 person) 15 minutes
8	(6 individual) 90 minutes + (2 people group) 20 minutes
9	(6 individual) 90 minutes + (3 people group) 40 minutes
10	(6 individual) 90 minutes + (4 people group) 40 minutes
10+	7 people in 90 minutes (15 each) + Divide the sample into groups and apply the minimum duration (limit group size to 10 people)


Example:

A company in a high-risk country has 60 employees. The sample size is 8 people. The assessor shall conduct 6 individual interviews (90 minutes) and a group interview session of 20 minutes with two employees.

Matrix of the minimum interview duration by country risk profile:

	Low-risk countries	Medium-risk countries	High-risk countries
Management/person responsible for GRASP	15 minutes for each or 20 minutes for 2	15 minutes for each or 20 minutes for 2	15 minutes for each or 20 minutes for 2
Employees' Representative	15 minutes for an individual; otherwise group interview	15 minutes for an individual; otherwise group interview	15 minutes for an individual; otherwise group interview
Trade Union representative if present and employed	15 minutes	15 minutes	15 minutes
Employees	<u>If requested:</u> group interview	Group interview	Up to 6 people 15 minutes each, above this group interview

PREPARED BY	APPROVED BY


	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	69 / 14
		Revision Number :	00
		Revision Date :	

6.4 Basic Conditions for Interviews with Employees

- a) During the opening meeting, assessors shall request a list of all employees present at the farm that day, including employees in all types of employment and every migratory status (i.e. nationals and foreign nationals).
- b) The sample shall always be selected by the assessor and never by the management (or its representative).
- c) Although the assessor's selection is random, the sample shall include employees in all types of employment and both migratory statuses – of the employees who are present at the moment of the assessment.
- d) Interviews shall be conducted without the presence of company management, supervisors or any other person that could interfere with the process.
- e) The company management shall provide appropriate facilities for the interviews:
 - The place shall be away from the place of work to avoid food safety and hygiene contamination risks.
 - It shall be a place that provides protection (visual and acoustic) to the employees and is not associated by employees with a place of disciplinary hearings or management operations.
- f) Interviews shall be conducted by the assessors in the language in which work instructions are given and commonly understood by the employee(s).
- g) It is the responsibility of management to provide facilities, resources and means for the assessor to bridge language limitations. Any third party that is called in shall be objective (i.e. when calling in a facilitator, translator or interpreter, they shall be independent from the company management).
- h) During the assessment, the assessors can take notes of names, initials or internal staff/register numbers of the employees interviewed in their audit logs, which are kept confidential.
- i) Employees shall be protected from retaliation for participating in interviews.
 - The management shall sign a statement recognizing this and allowing the CB to follow up on this in the next assessment.

This is a declaration or confirmation signed by the manager (or their representative) – in any form that suits the internal processes of the company (e.g. an addition, annex, a single letter provided to the assessor for the document review, etc.).
 - If during the subsequent assessment the CB finds evidence of retaliation due to the interviews conducted, the assessor shall initiate a procedure as described in the GRASP General Rules v1.3-1-i, Chapter 7.4.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	70 / 14
		Revision Number :	00
		Revision Date :	

6.5 Expected Duration of the Assessment

The total assessment duration depends on the size of the company and the number of employees, as well as the level of risk. The assessment shall last at least:

Activity	Minimum expected duration	
1. Opening meeting with management (or its representative(s)), producer if present, and the employees' representative	10–15 minutes	
2. Interview with the person responsible for GRASP and the management (or its representative)	15 minutes (one) or 20 minutes (if group interview)	
3. Interview with the employees' representative(s) If group interview	15 minutes Follow group interview rules	
4. Interview with trade union representative, if present	15 minutes	
5. Interviews with employees Sample size = Square root of the total employees present at the farm (includes all types of employment and migratory status, except those of management)	Medium-risk and low-risk requesting interviews	High-risk
	Based on group sample 2 persons = 20 minutes 3–6 persons = 40 minutes 7–10 persons = 60 minutes 10+ Divide in groups, e.g. 12 employees = two sessions of 6 people for 40 minutes each or one of 60 minutes with 10 persons and one of 20 minutes with 2.	Based on sample Individual 1 person = 15 minutes 2 persons = 30 minutes 3 persons = 45 minutes 4 persons = 60 minutes 5 persons = 75 minutes 6 persons = 90 minutes <u>From here group interviews</u> In samples of more than 6 employees continue with group interviews.
6. Site inspection for GRASP	20–30 minutes	
7. Document review Sample size = 50% of sample of employees interviewed	(depends on sample size)	
8. Closing meeting with management and employee representative	10–15 minutes	


Annex VI: GLOBALG.A.P. COVID-19 INTERVIEW PROTOCOL

1. Introduction

This protocol provides a procedure of safety in the global health emergency and shall be followed by certification bodies and producers

- when conducting GRASP interviews on site or remotely according to version 1.3-1-i and
- any time authorities at a local and/or national level declare a COVID-19-related state of emergency (verifiable evidence of public announcement (declaring and/or lifting) shall be provided by the CB).

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	71 / 14
		Revision Number :	00
		Revision Date :	


- a) This protocol provides exceptions to certain sections of Annex V “GRASP Country Risk Classification Concept”. These specific exceptions shall be applied only if:
- i. local and/or national authorities have established public health restrictions due to COVID-19 that limit the gathering of people, holding meetings, or face-to-face interaction (verifiable evidence of public announcement shall be provided by the CB).
 - ii. GLOBALG.A.P. Remote is used as result of movement or travel restrictions imposed by local and/or national authorities due to COVID-19.
- b) This protocol provides a procedure of safety for interviews also in the GRASP version 1.3 in situations as described in 1. a) i. and 1. a) ii. above: This protocol shall be applied when interviews with employees’ representative(s) are conducted on site or remotely according to version 1.3 (see 5, 6.ii, 8 in this Annex VI).

2. Procedure for Planning and Conducting Interviews

When public health restrictions of travel and/or gatherings are in place due to COVID-19, interviews will not be conducted face to face. Any interview shall occur using social distancing and wearing protective gear as indicated in the local and/or national public health regulation(s) or official recommendations. Assessors shall follow the procedure indicated below:

- a) This procedure applies to any interview included in Annex V. Producers shall provide a list of the employees and employees’ representative(s), including their ID numbers, before the start of the assessment to the assessor.
- b) Assessors shall document the applicable scenario with the restrictions in place in the GRASP Checklist (e.g. in the company description of the GRASP Master Data, including comments for example “no gatherings of more than 10 allowed”, “travel restriction”, etc.).
- c) If assessors are using information and communications technology (ICT), they shall follow the applicable rules indicated in the GLOBALG.A.P. Remote procedure (see section 2 “RULES FOR PLANNING AND SCHEDULING OF GLOBALG.A.P. REMOTE (USING ICT, BASED ON IAF ID 12:2015 AND IAF MD 4:2018)” and section 3 “RULES FOR CONDUCTING GLOBALG.A.P. REMOTE (BASED ON IAF MD 4:2018),” GLOBALG.A.P. Remote v1.2, English version).
- d) Recording the interview is not allowed. Assessors shall consult the local laws and regulations on privacy data protection, and follow their limitations accordingly in obtaining, sharing, or keeping employee information online when using video-capable (mobile) devices during the procedures.
- e) Addition to section 4.1 “Assessment Methodology by Country Risk Classification” in Annex V: The producer shall inform the employees and employees’ representative(s) about the date(s) of the GRASP assessment at least 5 working days in advance (e.g. a post or sign in the main languages spoken by the workers).
 - i. Notification shall include: information about the technical tools that may be used for conducting the interviews (e.g. meeting app or conference tool); the contact information of the employee representative indicating availability to received comments, questions or request from employees that will be provided to the assessor on the assessment day; and a note that the information shared through any tool used for the assessment will be treated confidentially by the assessor.
 - ii. The communication shall be documented by the producer and provided to the assessor at the beginning of the assessment (failing to document will result in non-compliance with GRASP control point 1.6).
- f) In any GRASP assessment in which this protocol is applied (including virtual assessments), the employees’ representative(s) shall be present or (virtually) available. This applies to the employee interviews as well: The employees’ representative(s) shall be present at the beginning to help the assessor to cross-check the identity of the employee who is interviewed.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	72 / 14
		Revision Number :	00
		Revision Date :	

- i. In addition to any other identity procedure included in this document, before starting any interview, the assessor shall cross-check the employees' representative(s)'s identity with the documentation mentioned in control point 1 of GRASP.
- ii. If the employees' representative(s) is/are not present or available, the GRASP assessment shall be re-scheduled until presence or availability is guaranteed.

3. Referring to Section 4.1 “Assessment Methodology by Country Risk Classification,” Annex V

3.1. Exception: If, on the day of the assessment, employees are not present at the farm being assessed:

a) In Option 1 and 3, the assessment can still be conducted if all of the following two conditions

apply:

- i. The employees' representative(s) is/are available and can participate in the assessment – both as interviewee(s) and supporting the employee interviews.
- ii. The absence of employees is due to travel and/or gathering restrictions (evidence provided).

OR

b) In Option 1 and 3, the assessment can still be conducted if all of the following three conditions apply:

- i. The GRASP assessment scope does not include produce handling with reference to IFA V5.4-GFS Crops Rules 4.1.2. iv).
- ii. The absence of employees is due to the situation considered in b) i. above.
- iii. The employees' representative(s) is/are available and can participate in the assessment – both as interviewee(s) and supporting. In this case, interviews become mandatory on the farm within the following year of this assessment as a condition of subsequent assessment. The assessor shall indicate this requirement in the comments following section 2.b of this annex.

c) In Option 2 and 4 (and in Option 1 or 3 multisite with QMS), assessment can still be conducted if all of the following three conditions apply:

- i. The employees' representative(s) of each producer member in the sample is available and can participate in the assessment – both as interviewee(s) and supporting the employee interviews.
- ii. The absence of employees is due to travel and/or gathering restrictions (evidence provided).
- iii. On the day of the assessment, instead of the producer group members without employees other producer group members with employees can be sampled.

3.2. Addition: When employees sampled by the assessor are not available at the farm on the day of the assessment, but are available and willing to be interviewed later, as an alternative to suspending or re-scheduling the assessment, the assessor can consider completing those interviews

- a) at another time or day at the farm or
- b) under GLOBALG.A.P. Remote rules at another time and place for the assessor. In any case,
- c) the time for completing the interviews shall not exceed 72 hours from the day of the assessment;
- d) the producer shall agree to and facilitate completing the interviews at another time;
- e) the employees' representative(s) shall be present or available to support the assessor during delayed interviews; and
- f) the assessor shall document the process, decision, and integrity steps followed. Mention of the change in interviews shall be indicated in the report in the section on duration of the assessment.

PREPARED BY	APPROVED BY



Document Name: GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Document Number :	RH 03
	Publish Date :	03.03.2021
	Page Number :	73 / 14
	Revision Number :	00
	Revision Date :	

4. Referring to Section 5 “Sample Size Calculation,” Annex V

4.1 Modification to 5.1 “Sample Size for Employee Interviews,” Annex V

- a) In low-risk countries: No change.
- b) In medium-risk countries: 60% of the square root of employees present on the day of the assessment. In the case of Option 2 producer groups, the employees counted for this sampling are the ones present out of all producer group members who were included in the external assessment.
- c) In high-risk countries: 70% of the square root of employees present on the day of the assessment. In the case of Option 2 producer groups, the employees counted for this sampling are the ones present out of all producer group members who were included in the external assessment.

4.2 Modification to 5.2. “Group Interviews”, Annex V

- a) Where group interviews are required, individual interviews with modified sample size shall be conducted instead (following section 5.1, Annex V.).
- b) Maximum time per individual interview shall not exceed 15 minutes.

5. Referring to Section 6 “Time Management,” Annex V

Addition to section 6.4. “Basic Conditions for Interviews with Employees,” Annex V:


5.1 Setting of the interview: When assessor and employees are in the same place on the same farm

- a) The conditions of the interview setting at the farm:
 - i. The interview can take place indoors or outdoors. (Outdoors is preferable to indoors, but the assessor shall decide considering employees’ safety.)
 - ii. The setting shall be private, away from, and out of sight of management and/or its representatives.
 - iii. It must be possible to be undisturbed in order to ensure a comfortable interview setting.
 - iv. If indoors, the setting shall permit good ventilation.
- b) Sanitary practices in the interview setting
 - i. Employees waiting to be interviewed must not be crowded into a small space or area (employees preferable are called individually to interview setting).
 - ii. Social distancing shall be guaranteed and practiced at all times.
 - iii. Protective gear shall be provided to and worn by both the assessor and the employee(s).
 - iv. It is preferred that the interviewee have access to water and soap hygiene stations before and after the interview. If this is not feasible, hand sanitizer and disinfectant for tables and chairs shall be used at the beginning and the end of the interview.
 - v. Employees’ representative role: The employees’ representative(s) shall be available and ready to support in scenarios as described in section 8.
 - vi. Subject to approval by the assessor, the employee can request to be accompanied by a person to help as interpreter. If in the same room or place, the assessor shall check that social distancing, protective gear, and good ventilation in the room are still guaranteed.
 - vii. Communication and technology support recommendations:
 - A transparent plastic shield can help provide an extra layer of protection if the distance between assessor and employee cannot be maintained.
 - If masks and distance interfere with communication, two telephones can complement the interaction.

5.2 Setting of the interview: When assessor and employees are in different places on the same farm

- a) The conditions of the interview setting at the farm:
 - i. Two places must be found.
 - ii. The interview places can be indoors or outdoors, at the discretion of the assessor.
 - iii. The interview places can be in proximity of each other or not.
 - iv. The place for the employees shall be private, away from, and out of sight of management and/or its representatives.
 - v. It must be possible to be undisturbed in order to ensure a comfortable interview setting.

PREPARED BY	APPROVED BY

	Document Name:	Document Number :	RH 03
	GLOBALG.A.P. ADD-ON (GRASP) CERTIFICATION GUIDE	Publish Date :	03.03.2021
		Page Number :	74 / 14
		Revision Number :	00
		Revision Date :	

- b) Sanitary practices in the interview setting
- i. Disinfectant for hands and tables shall be used at the beginning and the end of the interview.
 - ii. Employees' representative role: The employees' representative(s) shall be available and ready to support in scenarios as described in section 8.
 - iii. Subject to approval by the assessor, the employee can request to be accompanied by a person to help as interpreter. If in the same room or place, the assessor shall check that social distancing, protective gear, and good ventilation in the room are still guaranteed.
 - iv. Communication and technology support:
 - Two video-capable (mobile) devices shall be prepared in both places (rooms) and shall enable communication between the persons in the two rooms.
 - The (mobile) devices shall be set up and ready to use so that no actions (e.g. turning on or off) by the employees are needed and no manipulation (e.g. stopping or restarting the application) by any party is possible.
 - The employee or assessor must not record the interviews.

5.3 Setting of the interview: When assessor and employees are in different places and assessor is not on farm (i.e., remote assessment following GLOBALG.A.P. Remote)

- a) The conditions of the interview setting for the employee at the farm:
- i. The interview can take place indoors or outdoors (assessor shall check conditions remotely, supported by the employees' representative).
 - ii. The setting shall be private, away from, and out of sight of management and/or its representatives.
 - iii. It must be possible to be undisturbed in order to ensure a comfortable interview setting.
- b) Sanitary practices in the interview setting
- i. Disinfectant for hands and tables shall be used at the beginning and the end of the interview.
 - ii. Employees' representative role: As determined by the assessor, the employees' representative(s) shall be available and ready to support in case they are needed.
 - iii. Subject to approval by the assessor, the employee can request to be accompanied by a person to help as interpreter. If in the same room or place, the assessor shall check that social distancing, protective gear, and good ventilation in the room are still guaranteed.
 - iv. Communication and technology support requirements:
 - Two (mobile) devices shall be prepared in both rooms and shall enable communication between the persons in the two rooms. (preferred video capable devices over simple telephones).
 - The (mobile) devices shall be set up and ready to use so that no actions (e.g. turning on or off) by the employees are needed and no manipulation (e.g. stopping or restarting the application) by any party is possible.
 - The employee or assessor must not record the interviews.


If prior to or during the assessment the assessor realizes that any of the conditions above is not guaranteeing the privacy, safety, or integrity of the interview, postponement shall be considered.

6. Role of the Employees' Representative(s) Before, During, and at the End of the Interview Procedure

The employees' representative(s) shall

- a) be available and ready to support remotely at any time during the assessment (ideally through a (mobile) communication device provided by management (i.e., ready for a short call on telephone, via computer, tablet, etc.);
- b) Inform the assessor of the assessment notification given to employees and of any employee comment, questions or request of interview received.
- c) guide the employees to the place where the interview will take place in the farm; and
- d) support the assessor in verifying the identity of the employee when possible.

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7. Procedure to Cross-Check ID of the Employees and Employees' Representative(s)

- a) Producers shall provide a list of the employees and employees' representative(s), including their ID numbers, before the start of the assessment. The assessor shall cross check ID of employees and employees' representative before starting interviews.
- b) Using video-capable (mobile) devices,
 - i. employees and employees' representative(s) shall be asked to hold their ID close to their face to verify their identity.
 - ii. employees and employees' representative(s) shall also pan the device across the room to prove that they are alone during the interview;
 - iii. the assessor can invite the employees' representative(s) to the video or phone call for a few minutes at the beginning to confirm the identity of the worker.
- c) If using a communication device without video,
 - i. the assessor shall have copies of contracts, pay slips, and other documentation with data from employee and employees' representative(s).
 - ii. the assessor shall ask quick questions – date of birth, year of work, date of signing contract – to verify identity.
 - iii. the assessor can invite the employees' representative(s) to the phone call for a few minutes at the beginning to confirm the identity of the worker.

If there are doubts or problems in the identity verification, the interview shall be postponed until identities are verified. The time of postponement will be decided by the assessor but may not extend beyond 72 hours from the assessment date.

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