

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

## GRASP General Rules

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English Version



# GRASP General Rules

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## 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. See further information in the Chapters 2.1.e, 4.4.3 and in the Annex I. in this document.

## 2. DOCUMENTS

### 2.1 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, 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.

## 2.2 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.

## 2.3 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.

## 3. APPLICATION 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.

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.

### 3.1 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.

### 3.2 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.

### 3.3 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.

### 3.4 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.

### 3.5 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.

## 4. REGISTRATION PROCESS

### 4.1 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.

### 4.2 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.

#### 4.2.1 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 assessment checklist with the external assessment results.
  - c) The duration of the service contract is set between the CB and the producer.
  - 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.

#### 4.2.2 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.



### 4.3 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.

### 4.4 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.).

#### 4.4.1 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.

#### 4.4.2 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.

#### 4.4.3 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.

## 5. ASSESSMENT PROCEDURES

### 5.1 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.

### 5.2 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 assessment 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. 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.

### 5.2.1 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 either:

- directly by the subcontractor/at the subcontractor’s office/sites to the respective control points or
- 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) or
- via declaration or contract between the subcontractor and the GLOBALG.A.P. producer, including that the subcontractor knows and follows the GRASP requirements. The subcontractor can be informed and trained by the producer about the GRASP General Rules and CPCCs.

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.

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

- The producer receives an annual assessment.
- 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.
- Multisite operations with QMS shall implement GRASP on all sites and in the central Product Handling Unit (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 product handling unit (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.
- 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.

### 5.2.3 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 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.
- 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.
- 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).
- 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.

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:
- 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. and in Option 2 producer group assessments an audit of the QMS is required.
- 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.


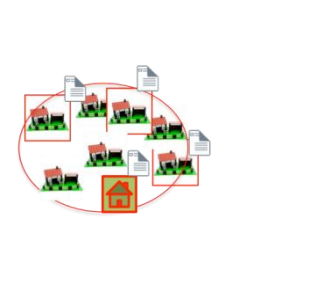
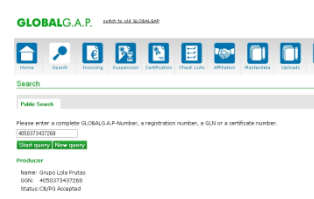
*In the GRASP Checklist only the externally assessed members' results are uploaded by the CB.*

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

	<p><b>1. Internal assessment:</b></p> <ul style="list-style-type: none"> <li>Use the GRASP Internal Checklist for Producer Groups to internally inspect all producer group members registered for GRASP. Keep the records of these inspections.</li> <li>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.</li> </ul>
	<p><b>2. External assessment:</b></p> <ul style="list-style-type: none"> <li>Use the GRASP Checklist to assess the square root sample of the producer group members registered for GRASP.</li> <li>Compare the results of the sample external assessments with the results of the internal assessments.</li> <li>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.</li> <li>If there are major differences between the external and the internal assessment results, use the Remarks/Comments field to note the deviation.</li> </ul>
	<p><b>3. Upload of the results to the GLOBALG.A.P. Database:</b></p> <p>Upload the completed GRASP Option 2 checklist with the external assessment results to the GLOBALG.A.P. Database.</p>

## 5.2.4 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 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.

## 6. 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.

### 6.1 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.

### 6.2 Technical Skills and Qualifications

#### 6.2.1 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 CB in-house trainer (IHT) has to provide GRASP in-house formal training(s) of at least 8 hours' duration, including all the relevant criteria and supporting regulation outlined in the GRASP National Interpretation Guideline(s) (NIG) of the countries in which the certification body 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.
- 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.

#### 6.2.2 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. 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.
- “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.



### 6.3 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.

### 6.4 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.

#### 6.4.1 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.
- 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.

### 6.5 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.

#### 6.5.1 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.

## 7. GRASP COMPLIANCE SYSTEM

### 7.1 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*.
- b) The registration is completed by generating a checklist via a mobile application, which has to be used during the GRASP assessment. This checklist is an individual checklist for an Option 1 single producer or an Option 2 producer group and it is generated for one valid assessment cycle (1 year).

### 7.2 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

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”.

### 7.3 Corrective actions

The assessment results can also be uploaded to the GLOBLAG.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.

#### 7.3.1 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.

#### 7.3.2 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.

#### 7.3.3 Unannounced Surveillance Inspections

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

### 7.4 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.

## 7.5 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.

## 7.6 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.

### 7.6.1 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 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.

### 7.6.2 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.

## 7.7 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.

### 7.7.1 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.

### 7.7.2 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.

## 7.8 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

### 7.8.1 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.

## 8. 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.

## 9. ABBREVIATIONS & DEFINITION OF TERMS

### 9.1 Abbreviations

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

GRASP	GLOBALG.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

## 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.

## 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. 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.

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

<b>For the country</b>	<b>Group responsible</b>
<b>Date/place</b>	<b>Signature</b>



## 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.

## 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 assessment 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.

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



**GN: 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 X<sup>1</sup>**

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

**The Annex contains details of the GRASP results (and the covered producer group members.<sup>2</sup>)**

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 GRASP<sup>3</sup>

Products <sup>3</sup>	Assessment number <sup>4</sup>	Product handling	No. of GRASP internally assessed producers <sup>5</sup>	Total number of producers
Product 1	00012-ABCDE-0003	Yes	10	10
Product 2	00034-FGHIJ-0003	Yes	15	20
<b>Total:</b>			<b>20</b>	<b>25</b>

**Overall compliance level:**

**QMS result<sup>6</sup>:**

**Assessment result in detail:**

*Control Point 1: Fully compliant.*

*Control Point 2: Fully compliant.*

*Control Point 3: Improvements needed.*

*Control Point 4: Fully compliant.*

...

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

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

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

### ANNEX 1 for GGN xxxxxxxxxxxxxxxx Checklist<sup>7</sup>

### ANNEX 2 for GGN xxxxxxxxxxxxxxxx Producer Group Members<sup>8</sup>:

Product(s) <sup>3</sup>	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.
- 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.

## EDITION UPDATE REGISTER

New document	Replaced document	Date of publication	Description of Modifications
150701_GRASP_Add-on-GR_V1-3_en	131201_GG_GRASP_GR_V1_2_Dec13_en	1 July 2015	New Version 1.3
190429_GRASP_Add-on-GR_V1-3-1_en	150701_GRASP_Add-on-GR_V1-3_en	29 April 2019	Annex III 'Terms of Reference for the Authorized Access to the GRASP Results' deleted
200602_GRASP_Add-on-GR_V1-3-i_en	190429_GRASP_Add-on-GR_V1-3-1_en	02 June 2020	<p>New edition 1.3-1-i</p> <p>Modifications in:</p> <ul style="list-style-type: none"> <li>3. Application options – Company details</li> <li>3.1 Option 1 Individual Producer</li> <li>3.3 Product Handling</li> <li>5.2.2 Option 1 – Individual Producer (with/without a QMS)</li> <li>3.4 Subcontractors</li> <li>3.4 &amp; 5.2.1 Subcontractors</li> <li>5.1 Self-assessments</li> <li>5.2.e Third party assessments/Comment quality (5.2.d deleted; 5.2.e becomes 5.2.d)</li> <li>5.2.3.d) Option 2 Producer Group</li> <li>5.2.3.h) Option 2 Producer Group</li> <li>5.2.4 Product Handling Unit</li> <li>6.1 Formal Qualifications</li> <li>6.2.1 (Technical Skills) In Countries Where GRASP NIGs Exist</li> <li>6.2.2 (GRASP assessments) In Countries without GRASP National Interpretation Guidelines (NONIG countries)</li> <li>7.3 Corrective Actions</li> <li>7.6 Sanctioning of Certification Bodies</li> <li>9.2 Definitions</li> </ul>

If you want to receive more information on the modifications in this document, please contact the GLOBALG.A.P. Secretariat at [translation\\_support@globalgap.org](mailto:translation_support@globalgap.org).