FLOWERS AND ORNAMENTALS

Management – Traceability

DOCUMENT FOR READING REFERENCE

V0.6-2 DRAFT FOR PUBLIC CONSULTATION

CONSULTATION PERIOD:

30 NOVEMBER 2020 TO 31 JANUARY 2021

Use this document as reading reference. For feedback, use online questionnaire or offline excel file.

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MANAGEMENT

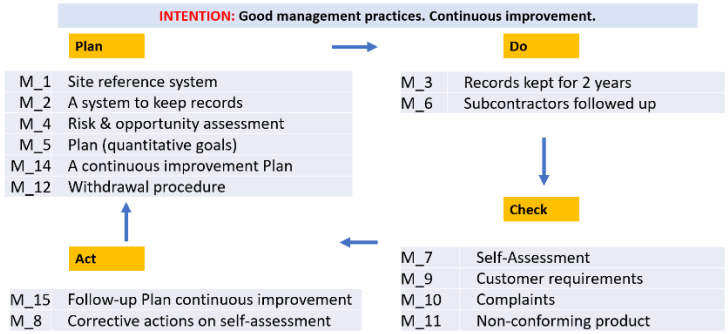
INTENTION:

- The goal is to support good management practices and continuous improvement.

MAIN CHANGES:

- Control points from 3 previous modules (AF, CB and FO) into one chapter with a logic closer to Plan-do-check-act cycle.
- Site risk management focused on environmental impact and not on risks of the environment towards product (food safety).
- Merge several customer requirements into one.
- Non-conforming product and Withdrawal as Minors. Relevance is not as high as in food safety. No recall of product required.
- Introducing continuous improvement plan and follow-up.

Plan-do-check-act cycle



Summary table showing changes in level of requirement

MANAGEMENT (M)				
	Site History			
M_1	Reference system of fields/greenhouses	AF 1.1.1	Major Must	Major Must
M_2	Recording system	AF 1.1.2	Major Must	Major Must
M_3	Records kept for 2 years	AF 2.1	Major Must	Major Must
	Site Management			
M_4	Risk assessment (env impact)	AF 1.2.1	Major Must	Major Must
M_5	Action Plan (and quantitative goals)	AF 1.2.2	Major Must	Major Must
	Self-Assessment – Checklist			
M_6	Subcontractors meet control points	AF 5.1	Major Must	Major Must
M_7	Self-assessment once a year	AF 2.2	Major Must	Major Must
M_8	Corrective actions based on self-assessment	AF 2.3	Major Must	Major Must
	Listening to External Clients			
M_9	Customer expectations	FO 1.1.1 + FO 5.2.5 + FO 5.2.6	Minor Must	Minor Must
M_10	Complaints	AF 8.1	Major Must	Major Must
M_11	Non-conforming product	AF 17.1	Major Must	**Minor Must**
M_12	~~Recall /~~ Withdrawal	AF 9.1	Major Must	**Minor Must**
	Adjusting Direction			
M_13	~~Annual evaluation~~	New		**Delete**
M_14	Continuous improvement Plan	New		**Major Must**
M_15	Follow-up on continuous improvement plan	New		**Minor Must**

Color code for table below: text in black font: original (v5.2); **Red**/strikethrough: deleted. **Blue**: proposed in Draft 1. **Green**: proposed in Draft 2.

		Control Points	Compliance Criteria	Level
M		**MANAGEMENT**		
		INTENTION: *One of the key features of sustainable farming is the continuous integration of site-specific knowledge and practical experience into future management planning and practices.* *This section is intended to ensure proper site management based on planning and monitoring own practices and product, including listening to external clients to enhance learnings and improvement ~~ensure that the land, buildings, and other facilities which constitute the fabric of the farm, are properly managed to ensure the safe production of food and protection of the environment~~.*		
		Site History		
M_1	AF 1.1.1	~~Is there a map and a reference system for each field, orchard, greenhouse, yard, plot, livestock building/pen, and/or other area/location used in production?~~ Is there a reference system for each site used in production, and identification of water sources?	~~Compliance shall include visual identification in the form of:~~ ~~• A physical sign at each field/greenhouse or other farm area/location~~ AND ~~• A farm map, which also identifies the location of watercourses, ponds, reservoirs, storage/handling facilities, unproductive areas, and that could be cross-referenced to the identification system. Examples of unproductive areas are low-lying wet areas, woodlands, headland strips, or areas of impoverished soil. No N/A.~~ Growers may have: • A physical sign at each field~~/orchard, vineyard~~, greenhouse/~~yard/~~ building, or other farm area/location and/or • A farm map, which also identifies the location of water sources, ponds, reservoirs, storage/handling facilities, unproductive areas, others, and that could be cross-referenced to the identification system. Examples of unproductive areas are low-lying wet areas, woodlands, headland strips, or areas of impoverished soil. No N/A.	Major Must

		Control Points	Compliance Criteria	Level
M_2	AF 1.1.2	A recording system is established for each unit of production to provide a record of the agronomic activities undertaken.	Current records shall provide a history of GLOBALG.A.P. production of all production areas. No N/A.	Major Must
M_ 3	AF 2.1	All records requested during external inspection are accessible and kept for a minimum period of 2 years, unless a longer requirement is stated in specific control points or required by local legislation?	~~Producers shall keep up-to-date records for a minimum of 2 years.~~ Electronic records are valid and when they are used, producers are responsible for maintaining back-ups of the information. For the initial inspections, producers shall keep records from at least 3 months prior to the date of the external inspection or from the day of registration, whichever is longer. New applicants shall have full records that reference each area covered by the registration with all of the agronomic activities related to GLOBALG.A.P. documentation required for this area. ~~For livestock, these records shall be available for the current livestock cycle before the initial inspection.~~ This refers to the principle of record keeping. When an individual record is missing, the respective control point dealing with those records is not compliant. No N/A.	Major Must

		Control Points	Compliance Criteria	Level
		Site Management		
M_4	AF 1.2.1	Is there a risk assessment available for all sites registered for certification (this includes rented land, structures, and equipment) and does this risk assessment ~~that the site in question is suitable for production, with regards to food safety, the environment, and health and welfare of animals in the scope of the livestock and aquaculture certification where applicable?~~ identify the potential impacts of the farm operations to the environment and of the environment to the operation? Opportunities to enhance the environment are identified, if applicable.	A written risk assessment ~~to determine whether the sites are appropriate for production~~ identifying the impact to the environment of existing and proposed activities, shall be available for all sites. It shall be ready for the initial inspection and maintained updated and reviewed when new sites enter in production and when risks for existing ones have changed~~, or at least annually, whichever is shorter.~~ The risk assessment may be based on a generic one but shall be customized to the farm situation. Risk assessments shall take into account: • Production processes taking place • Potential physical, chemical ~~(including allergens),~~ and biological hazards • Site history (for sites that are new to agricultural production, history of 5 years is advised and a minimum of one year shall be known). • Impact of existing or proposed activities on adjacent sites and environment. Impact of proposed enterprises on adjacent stock/crops/environment.~~, and the health and safety of animals in the scope of the livestock and aquaculture certification~~ • Opportunities in the production site to enhance / improve the environment in line with existing local ecosystems, land planning guidelines, conservation areas, for example enhancing biodiversity in unproductive areas. Examples of unproductive areas are low-lying wet areas, woodlands, headland strips, or areas of impoverished soil, etc. (See Annex AF 1 and Annex AF 2 for guidance on risk assessments. ~~Annex FV 1 includes guidance regarding flooding~~)	Major Must

		Control Points	Compliance Criteria	Level
M_5	AF 1.2.2	Has a management plan that establishes strategies to minimize the risks and make use of the opportunities identified in the risk assessment (AF 1.2.1) been developed and implemented? Does it include quantitative goals for input consumption?	~~A management plan addresses the risks~~ and opportunities ~~identified in AF 1.2.1 and describes the actions to address them. the hazard control procedures that justify that the site in question is suitable for production.~~ The plan includes quantitative goals in the efficient and optimal use of the following inputs: plant protection products, fertilizers, water, and energy. ~~A written management policy adequate to the producer conditions expresses the sustainability intentions that the grower has. The sustainability policy is communicated to all workers and relevant stakeholders.~~ This plan shall be appropriate to the farm operations, and there shall be evidence of its implementation and effectiveness. ~~NOTE: Environmental risks do not need to be part of this plan and are covered under AF 7.1.1.~~	Major Must

		Control Points	Compliance Criteria	Level
		Self-Assessment – Checklist		
M_6	AF 5.1	When the producer makes use of subcontractors, do they oversee their activities in order to ensure that those activities relevant to GLOBALG.A.P. CPCC comply with the corresponding requirements?	A subcontractor is the entity furnishing labor, equipment and/or materials to perform specific farm operation(s) under contract with the producer (e.g. custom grain harvesting, fruit spraying and picking). The producer is responsible for observing the control points applicable to the tasks performed by the subcontractors, by checking and signing the assessment of the subcontractor for each task and season contracted.Evidence of compliance with the applicable control points shall be available on the farm during the external inspection. i) The producer can perform the assessment and shall keep the evidence of compliance of the control points assessed. The subcontractor shall agree that GLOBALG.A.P. approved certifiers are allowed to verify the assessments through a physical inspection or ii) A third-party certification body, which is GLOBALG.A.P. approved, can inspect the subcontractor. The subcontractor shall receive a letter of conformance from the certification body with the following info: 1) Date of assessment 2) Name of the certification body 3) Inspector name 4) Details of the subcontractor 5) List of the inspected control points and compliance criteria. Certificates issued to subcontractors against standards that are not officially approved by GLOBALG.A.P. are not valid evidence of compliance with GLOBALG.A.P."	Major Must

		Control Points	Compliance Criteria	Level
M_7	AF 2.2	Does the producer take responsibility to conduct a minimum of one internal self-assessment per year against the GLOBALG.A.P. Standard?	There is documented evidence that in Option 1 an internal self-assessment has been completed under the responsibility of the producer (this may be carried out by a person different from the producer). Self-assessments shall include all applicable control points, even when a subcontracted company carries them out. The self-assessment checklist shall contain comments of the evidence observed for all non-applicable and non-compliant control points. This has to be done before the CB inspection (see GLOBALG.A.P. General Regulations Part I, section 5.). No N/A, except for multisite operations with QMS and producer groups, for which the QMS checklist covers internal inspections.	Major Must
M_8	AF 2.3	Have effective corrective actions been taken as a result of non-conformances detected during the internal self-assessment or internal producer group inspections?	Necessary corrective actions are documented and have been implemented. N/A only in the case where ~~no~~ zero non-conformances are detected during internal self-assessments or internal producer group inspections.	Major Must
		Listening to External Clients		
M_9	Merge FO 1.1.1 + FO 1.1.3 (variety) + FO 5.2.5 + FO 5.2.6	Is the producer or packer aware of the customer requirements, commercial restrictions and import country restrictions?	Written correspondence exists between the customer and the producer or packer demonstrating mutual agreement on specifications including: • variety and quality specifications, • ~~commercial~~ customer restrictions on specific chemicals ~~or PPP residue testing~~, ~~• restrictions on specific chemicals in individual countries.~~ The producer shall prove that these are adhered to. When producers do not know their client yet, they shall define own quality specifications for the intended market. ~~No N/A.~~	Minor Must

		Control Points	Compliance Criteria	Level
M_10	AF 8.1	~~Is there a complaint procedure available relating to both internal and external issues covered by the GLOBALG.A.P. Standard and does this procedure ensure that complaints are adequately recorded, studied, and followed up, including a record of actions taken?~~ Are complaints used as a means to continuously improve and resolved according to procedure?	A documented complaint procedure is available to facilitate the recording and follow-up of all received complaints relating to issues covered by GLOBALG.A.P. actions taken with respect to such complaints~~.~~ In the case of producer groups, the members do not need the complete complaint procedure, but only the parts that are relevant to them. The ~~complaint~~ procedure shall include the notification of GLOBALG.A.P. Secretariat via the certification body in the case that the producer is informed by a competent or local authority that they are under investigation and/or has received a sanction in the scope of the certificate.Records of how feedback or complaints resulted in improvements to practices are documented. ~~In the case of producers certified to an Equivalent Benchmarked scheme, these should notify their scheme manager via the certification body~~. No N/A.	Major Must
M_11	AF 17.1	~~Does the producer have a documented procedure for non-conforming products and has it been implemented?~~ Is there a documented procedure for management of non-conforming products?	Non-conforming product refers to product not meeting requirements defined by the customer, a regulation (e.g. phytosanitary) or by the company itself. Non-conforming products shall be: • clearly identified and quarantined as appropriate, • handled or disposed of according to the nature of the problem and/or specific customer requirements. ~~A documented procedure is in place specifying that all non-conforming products shall be clearly identified and quarantined as appropriate. These products shall be handled or disposed of according to the nature of the problem and/or specific customer requirements.~~	~~Major Must~~ Minor Must
M_12	AF 9.1	Does the producer have documented procedures on how to manage~~/initiate~~ the withdrawal~~/recall~~ of certified products from the marketplace and are these procedures tested annually?	The procedure identifies the type of event that may result in a withdrawal~~/recall~~, the people responsible for making the decision on the possible product withdrawal~~/recall~~, the mechanism for notifying the next step in the supply chain ~~and the GLOBALG.A.P. approved certification body,~~ and the methods of reconciling stock. ~~The procedures shall be tested annually to ensure that they are effective. This test shall be recorded (e.g. by picking a recently sold batch, identifying the quantity and whereabouts of the product, and verifying whether the next step involved with this batch and the CB can be contacted. Actual communications of the mock recall to the clients are not necessary~~. A list of phone numbers and emails is sufficient). No N/A.	~~Major Must~~ Minor Must

		Control Points	Compliance Criteria	Level
		Adjusting Direction		
M_13	New	~~An annual evaluation is carried out by management to improve its performance by addressing complaints, changes in customer requirements, identified corrective actions and action plan to address risks.~~	~~There is documented evidence that management evaluates complaints (procedure, records and action), customer requirements (any changes in quality specifications, commercial or import country restrictions), self-assessment and corrective actions, risks and action plan, quantitative goals in input consumption, non-conforming product (procedure, records and action). There is documented evidence of any corrective action and action plan to implement it, in case these are identified.~~	~~Recom~~ Delete
M_14	New	Actions to improve are planned and documented.	Continuous improvements based on self-assessments and site inspections shall be planed and documented. Planned actions for improvement are defined by the producer. The plan sets goals and milestones and can include opportunities to: - enhance the environment (see M_5 or AF 1.2.2), - improve the production produces, including optimization of quantitative goals in input consumption, - improve worker's health & safety and welfare.	Major Must
M_15	New	Planned actions for improvement are monitored and documented.	Goals and milestones are followed-up and results documented. In case goals or milestones are not achieved there is a reasonable explanation for it.	Minor Must

TRACEABILITY & MASS BALANCE

INTENTION:
Traceability allows to:

- distinguish between certified and non-certified product, supporting the credibility of the certificate,
- reconcile practices with products, improve quality and production process,
- enables, if needed, to withdrawal of non-conforming product.

MAIN CHANGES:

- delete the need to segregate certified product from non-certified. Traceability is based on a (stricter) mass balance system.

KEY CONSULTATION QUESTION:

- Would you favor that in Flowers and Ornamentals, the traceability system be based on mass balance, without the need to require segregation of certified and non-certified product?
  Note: in case there is demand from stakeholders in this direction, GLOBALG.A.P. will draft additional rules to minimize risks.

		Control Points	Compliance Criteria	Level
TR		**TRACEABILITY ~~AND SEGRAGATION~~**		
		Traceability allows to distinguish between certified and non-certified product, supporting the credibility of the certificate. It also allows producers to reconcile practices with products and quality and improve its production process and quality. It allows the ~~recall~~/withdrawal of ~~foods and~~ flowers and ornamentals when needed, and enables customers to be provided with targeted and accurate information concerning implicated products.		
TR_1	CB 1.1	Is a GLOBALG.A.P. registered product traceable back to and trackable from the registered farm (and other relevant registered areas) where it has been produced and, if applicable, handled?	There is a documented identification and traceability system that allows GLOBALG.A.P. registered products to be traced back to the registered farm or, in a producer group, to the registered farms of the group, and tracked forward to the immediate customer (one step up, one step down). Harvest information shall link a batch to the production records or the farms of specific producers (refer to General Regulations Part II for information on segregation in Option 2). Produce handling shall also be covered, if applicable. No N/A.	Major Must

		Control Points	Compliance Criteria	Level
		Section 13 is applicable to all producers who need to register for parallel production/ownership and to those who buy from other producers (certified or not), the same products they also certify. It is not applicable to producers who certify 100 % of the product in their GLOBALG.A.P. scope and do not buy of those products from other producers (certified or not).		
TR_2	AF 13.1	Is there an effective system in place to identify ~~and segragate~~ all GLOBALG.A.P. certified and non-certified products?	A system shall be in place to be able to identify at any moment ~~and mixing~~ certified and non-certified products. This can be done via physical identification or product handling procedures, including the relevant records.	Major Must
TR_3	AF 13.2	In the case of producers registered for parallel production/ownership (where certified and non-certified products are produced and/or owned by one legal entity), is there a system to ensure that all final products originating from a certified production process are correctly identified?	In the case the producer is registered for parallel production/ownership (where certified and non-certified products are produced and/or owned by one legal entity), there is evidence that an effective mass balance system is in place that can tell the amounts of certified and non-certified product at all times. ~~all product packed in final consumer packaging (either from farm level or after product handling) shall be identified with a GGN where the product originates from a certified process.~~ ~~It can be the GGN of the (Option 2) group, the GGN of the group member, both GGNs, or the GGN of the individual (Option 1) producer.~~ ~~The GGN shall not be used to label non-certified products.~~ N/A only when the producer only owns GLOBALG.A.P. products (no PP/PO), or when there is a written agreement available between the producer and the client not to use the GGN, GLN, or sub-GLN on the ready to be sold product. This can also be the client's own label specifications where the GGN is not included. Or N/A when there is evidence that an effective mass balance system is in place.	Major Must
TR_4	AF 13.3	Is there a final check to ensure the correct product dispatch of certified and non-certified products?	The check shall be documented to show that the certified and non-certified products are dispatched correctly.	Major Must

		Control Points	Compliance Criteria	Level
TR_5	AF 13.4	Are appropriate identification procedures in place and records for identifying products purchased from different sources available for all registered products?	Procedures shall be established, documented and maintained, appropriately to the scale of the operation, for identifying certified and, when applicable, non-certified quantities purchased **and/or aggregated** from different sources (i.e. other producers or traders) for all registered products. Records shall include: • Product description • GLOBALG.A.P. scheme certified status • Quantities of product(s) purchased • Supplier details • Copy of the GLOBALG.A.P. certificates where applicable • Traceability data/codes related to the purchased products • Purchase orders/invoices received by the organization being assessed • List of approved suppliers	Major Must
		Mass Balance		
TR_6	AF 14.1	Are sales records available for all quantities sold and all registered products?	Sales details of certified and, when applicable, non-certified quantities shall be recorded for all registered products, with particular attention to quantities sold and descriptions provided. The documents shall demonstrate the consistent balance between the certified and non-certified input and the output. No N/A.	Major Must
TR_7	AF 14.2	Are quantities (produced, stored and/or purchased) recorded and summarized for all products?	Quantities (including information on volumes or weight) of certified, and when applicable non-certified, incoming (including purchased products), outgoing and stored products shall be recorded, and a summary maintained for all registered products, so as to facilitate the mass balance verification process. The frequency of the mass balance verification shall be defined and be appropriate to the scale of the operation, but It shall be done at least **quarterly** ~~annually~~ per product. Documents to demonstrate mass balance shall be clearly identified. This control point applies to all GLOBALG.A.P. producers. No N/A.	Major Must
TR_8	AF 14.3	Are conversion ratios and/or loss (input-output calculations of a given production	Conversion ratios shall be calculated and available for each relevant handling process. All generated product waste quantities shall be estimated and/or recorded. No N/A.	Major Must

		Control Points	Compliance Criteria	Level
		process) during handling calculated and controlled?		
		GLOBALG.A.P. Status		
TR_9	AF 11.1	Does all transaction documentation include reference to the GLOBALG.A.P. status and the GGN?	Sales invoices and, where appropriate, other documentation related to sales of certified material/products shall include the GGN of the certificate holder and a reference to the GLOBALG.A.P. certified status. This is not obligatory in internal documentation. Where producers own a GLN, this shall replace the GGN issued by GLOBALG.A.P. during the registration process. Positive identification of the certified status is enough on transaction documentation (e.g.: ''GLOBALG.A.P. certified <product name>''). Non-certified products ~~do not need~~ needs ~~to~~ to be identified as "non-certified". Indication of the certified status is obligatory regardless of whether the certified product was sold as certified or not. This cannot be checked during the initial (first ever) inspection, because the producer is not certified yet and the producer cannot reference to the GLOBALG.A.P. certified status before the first positive certification decision. N/A only when there is a written agreement available between the producer and the client not to identify the GLOBALG.A.P. status of the product and/or the GGN on the transaction documents.	Major Must

		Control Points	Compliance Criteria	Level
		Logo Use		
TR_10	AF 12.1	Is the GLOBALG.A.P. word, trademark, GLOBALG.A.P. QR code or logo and the GGN (GLOBALG.A.P. Number) used according to the GLOBALG.A.P. General Regulations and according to the 'Sublicense and Certification Agreement'?	The producer/producer group shall use the GLOBALG.A.P. word, trademark, GLOBALG.A.P. QR code or logo and the GGN , GLN or sub-GLN according to the General Regulations Part I, Annex 1 and according to the 'Sublicense and Certification Agreement'. The GLOBALG.A.P. word, trademark, or logo shall never appear on the final product, on the consumer packaging, or at the point of sale. However, the certificate holder can use any and/or all in business-to-business communications. N/A only when there is a written agreement available between the producer and the client not to identify the GLOBALG.A.P. status of the product and/or the GGN on the transaction documents. N/A for CFM, PPM, GLOBALG.A.P. Aquaculture ova or seedlings, and Livestock, when the certified products are input products, not intended for sale to final consumers and will definitely not appear at the point of sale to final consumers.	Major Must