

GLOBALG.A.P. Maximum Residue Limit (MRL) Complaints Procedure

All GLOBALG.A.P. stakeholders are invited to submit any suspicious cases, actual, and/or potential non-compliances in regard to GLOBALG.A.P. certification to the GLOBALG.A.P. Secretariat. The notifications are then followed up and the complainant receives a final report including the conclusion of the investigation. Notification can be a case of an MRL exceedance linked to a producer using GLOBALG.A.P. certified production processes and based on a residue analysis by a laboratory.

Such cases can be submitted to the GLOBALG.A.P. Secretariat by e-mail to mrl@globalgap.org or fax to +49 (0) 2 21-57776 -1999.

Any incoming case shall include this information:

Laboratory analysis:

- ✓ Reference indicating that the examining laboratory is accredited to ISO/IEC 17025
- ✓ Date sample was taken
- ✓ Date analysis was completed
- ✓ List of analyzed active ingredients
- ✓ Quantification of the amount in exceedance (ppm)

Traceability:

- ✓ Clear and legible identification of the origin of the sample (please see Annex I)
- ✓ Photos with product packaging label and any relevant traceability information

It is important that there is clear traceability to the lot involved, so before starting an investigation, the GLOBALG.A.P. Secretariat will classify the cases according to Annex II.

The certification body and the GLOBALG.A.P. Secretariat investigate the MRL cases according to the process shown in the chart below. Besides a review of the inspection report, an unannounced (or announced) inspection may be carried out to check the producer's pesticide documentation and the traceability system on site.

Based on the result and the producer's actions, a report is forwarded to the GLOBALG.A.P. Secretariat.

The Secretariat monitors the process and in the case of a systematic failure, the Secretariat files the case with the Certification Integrity Program (CIPRO). A final report is then sent to the complainant.

ANNEX I

Requirements on traceability information, photos, and analysis report:

All key information included in the label (punnet/bag and/or box and/or pallet) of the analyzed sample should be included in the photo analysis report or in the information supplied by the complainant:

- Traceability information: i.e., barcode, traceability code, lot number, batch number, etc.
- Producer's GGN
- Identification of the packer
- All documentation relevant for proving traceability of this product back to the producer (invoice, delivery notes, etc.) for the relevant batch, including the names and addresses of the traders/suppliers involved in the supply chain between the producer and the point of sampling.

Note: Please consider that if transaction documents do not include a GGN/CoC Number and a declaration regarding GLOBALG.A.P. certified status, the product cannot be sold with a claim of GLOBALG.A.P. certification.

Packer identification:

- If the packer's identification is printed on the label, please include this information (e.g., as a photo of the label).
- If the packer's identification is not printed on the label, please communicate packer name, address, and country. If the packing process is GLOBALG.A.P. certified, please include GGN/CoC Number of the packing company.
- Please include all documentation (traceability information, transaction documents, delivery notes, etc.) that proves that the company has packed the product.

Producer identification:

- If GGN/CoC Number is printed on the label, please include this information (e.g., photo of the label).
- If GGN/CoC Number is not printed on the label, please include information about GGN, GLOBALG.A.P. certification status and producer company name.

Please see examples of labels below:



1: Traceability information and identification of the packer missing



2: Producer's GGN and identification of the packer missing



3: All information included



4: Identification of the packer missing and label almost illegible



5: No information available linking this sample with a producer with GLOBALG.A.P. certified production processes

ANNEX II

Cases classification

Scenario	Scenario description	Category
1	No analysis	Red
2	With analysis – No product label	Red
3	With analysis – With product label – Not legible	Red
4	With analysis – With product label – Legible – Without GGN	Red
5	With analysis – With product label – Legible – With GGN – Packed by the producer	Green
6	With analysis – With product label – Legible – With GGN – Repacked – No traceability	Red
7	With analysis – With product label – Legible – With GGN – Repacked – With traceability – CoC	Green
8	With analysis – With product label – Legible – With GGN – Repacked – With traceability – No CoC	Yellow

1. The GLOBALG.A.P. Secretariat receives a complaint without laboratory analysis. In these cases, the Secretariat will require the complainant to procure a laboratory analysis. If the Secretariat does not receive the laboratory analysis within two weeks, the complaint will be rejected.
2. The GLOBALG.A.P. Secretariat receives a complaint including laboratory analysis, but without the product label. In these cases, the Secretariat will require the complainant to provide the product label. If the Secretariat does not receive the product label within two weeks, the complaint will be rejected.
3. The GLOBALG.A.P. Secretariat receives a complaint including laboratory analysis and an illegible product label. In these cases, the Secretariat will require the complainant to provide a clearer photo of the product label. If the Secretariat does not receive a legible product label within two weeks, the complaint will be rejected.

4. The GLOBALG.A.P. Secretariat receives a complaint including laboratory analysis and a product label without GGN/CoC Number. In these cases, the Secretariat will require the complainant to provide evidence that this product was sold under GLOBALG.A.P. certification (invoice, delivery note, etc. with GGN/CoC Number and statement regarding GLOBALG.A.P. certified status). If the Secretariat does not receive the evidence within two weeks, the complaint will be rejected.
5. The GLOBALG.A.P. Secretariat receives a complaint including laboratory analysis, a legible product label with GGN, and the product is packed by the producer. The information received is sufficient. The case will be investigated.
6. The GLOBALG.A.P. Secretariat receives a complaint including laboratory analysis, a legible product label with GGN, but the product is repacked. The Secretariat will ask the retailer or its first supplier for the traceability information in order to trace the product back to the producer (producer invoice, producer lot, producer delivery note, etc.). If within two weeks the Secretariat does not receive the traceability information to trace the product back to the producer, the complaint will be rejected.
7. The GLOBALG.A.P. Secretariat receives a complaint including laboratory analysis, a legible product label with a GGN, and the product is repacked by a CoC-certified company. The information received is sufficient. The case will be investigated.
8. The GLOBALG.A.P. Secretariat receives a complaint including laboratory analysis, a legible product label with GGN, and the product is repacked by a not CoC-certified company. If the traceability information (invoices, delivery notes, etc.) to trace the product back to the producer is clear, the case will be investigated by the Secretariat (for cases received until 31 December 2021).

Categories:

Green: The information received is sufficient. The case will be investigated.

Yellow: The GLOBALG.A.P. Secretariat will investigate these cases if received before 1 January 2022.

Red: The GLOBALG.A.P. Secretariat will ask the retailer or retailer's first supplier for more information before starting an investigation. If the Secretariat does not receive the needed information, the complaint will be rejected.