



# **GLOBALG.A.P. Certification Body Sanction Catalog**

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## 1 INTRODUCTION

This document describes those certification body (CB) non-conformances that are not detected during CIPRO assessments but during CB administration processes, customer support questions, CB approvals, etc. This catalog applies to all GLOBALG.A.P. standards, add-ons, and benchmarked checklists but does not apply to benchmarked schemes unless the benchmarked scheme/checklist owner authorizes the GLOBALG.A.P. Secretariat to apply this catalog.

In case of a well-founded objection that results in a dispute, the case will be forwarded to the Integrity Surveillance Committee (ISC) for review and final decision.

## 2 TERMINOLOGY

For the sake of simplicity, in this document:

- Whenever the term “CB auditor” is used, it shall refer to a CB farm auditor, CB QMS auditor, or CB assessor depending on the relevant Option for certification, standard, or add-on.
- Whenever the term “CB audit” is used, it shall refer to a CB farm audit, CB QMS audit, or assessment depending on the relevant Option for certification, standard, or add-on.
- Whenever the term “certificate” is used, it shall refer to a certificate, proof of assessment, letter of conformance.
- Whenever the term “producer(s)” is used, it shall refer to persons (individuals) or businesses (companies, individual producers, or producer groups) that are legally responsible for the production processes and the products of the respective scope, sold by those persons or businesses, as well as to Chain of Custody or Compound Feed Manufacturing companies.
- Whenever the term “general regulations” is used, it shall refer to the GLOBALG.A.P. general regulations and/or the relevant add-on’s general rules. Whenever specific rules are referred to, they are identified by including the name of the particular standard or add-on.

## 3 LIST OF NON-CONFORMANCES

Non-conformance	Example(s)	Sanction	KPI
Misleading or false communication about GLOBALG.A.P. certification and/or logo use by a CB	CB issues a CB audit confirmation letter with the promise to issue a certificate soon; using a GLOBALG.A.P. Community Member logo when the CB is not a member CB; the CB advertises an activity the CB is not approved for or not covered by GLOBALG.A.P. (e.g., certifying the production process of	The GLOBALG.A.P. Secretariat notifies the CB of the detected case. After the misuse is confirmed, the fine (€100) is imposed and the corrective actions shall be completed within five working days. If the corrective actions are not completed in time, a €500 fine is imposed and the correction must occur within the next five working days. If this deadline is missed, a temporary	Response speed and effectiveness measured under “Complaint Management”

Non-conformance	Example(s)	Sanction	KPI
	recreational marijuana or chocolate to the Integrated Farm Assurance)	suspension applies (blocked database access and Red Card is issued); lifting of the temporary suspension is only possible after the €500 fine is paid and the corrective actions are sufficient.  The accreditation body (AB) is informed at each step of the process.	
Refusal to sign any obligatory contract with the GLOBALG.A.P. Secretariat and/or any necessary of its amendments	GLOBALG.A.P. license and certification agreement (LCA) not signed, GLOBALG.A.P. sublicense agreement amendment not signed within a period set by the GLOBALG.A.P. Secretariat	A suspension applies after a deadline set in the second reminder.  This refers to the contract updates (e.g., a new version of the LCA) only.  The AB is informed of the suspension.	N/A
Neglecting to pay any of the GLOBALG.A.P. fees	CB license fee, training fee, certification license fee, and/or producer registration fee not paid	Any outstanding payment of invoices accepted by the CB is subject to a first reminder after four weeks of issuance. If the payment has not been received six weeks after the issuance of the pending invoice, a second reminder is sent. Eight weeks (56 days) after the issuance a warning letter is sent.  In the event that the CB/VB fails to pay amounts invoiced within 56 days of receipt of the invoice, FoodPLUS GmbH shall be entitled to charge the CB/VB interest on such overdue sum at the rate of nine (9) percentage points above the basic rate of interest (per annum as calculated and announced by the German	Administrative Management  See the latest version of document "CB KPI Specification GLOBALG.A.P."

Non-conformance	Example(s)	Sanction	KPI
		<p>Bundesbank in accordance with the specifications of the European Central Bank). Furthermore, in the event the CB/VB fails to pay amounts invoiced within 56 days of receipt of the invoice, the CB/VB undertakes to pay FoodPLUS GmbH a contractual penalty amounting of €50, unless the CB/VB can prove that the nonpayment was not culpable, or that the actual amount of damage incurred by FoodPLUS GmbH is lower than the contractual penalty. Further claims of FoodPLUS GmbH remain unaffected. Any interest for late payment (or any other compensation for damages resulting therefrom) paid by the CB/VB to FoodPLUS GmbH shall be offset against the contractual penalty.</p> <p>If the invoice has not been settled within three months of the written warning by the GLOBALG.A.P. Secretariat, the CB's approval status will be set to "suspended" (Red Card). If the suspension due to unpaid invoices exceeds six months, the contract with the CB will be canceled ("GLOBALG.A.P. general regulations – Rules for certification bodies," section 11.3.5).</p> <p>The AB is informed of the Red Card and temporary suspension and cancelation (whichever applies).</p>	

Non-conformance	Example(s)	Sanction	KPI
Confirmed fraud	Faking the CB audit report content: entering another CB auditor for the certification who did not conduct the CB audit, entering a wrong audit date, not reporting the actual audit date and duration, issuing certificates without auditing the registered scope, falsifying training certificates, etc.	<p>Refer to “GLOBALG.A.P. general regulations – Rules for certification bodies,” section 11.2 (cf. the classification description).</p> <p>Further CB audit(s) may be planned to investigate whether it was an isolated incident or a general way of working, but one single CB audit may also result in classification #1.</p> <p>The ISC is immediately notified of the case. The CB shall implement corrections/corrective actions on the farm and CB levels immediately.</p> <p>If it is shown that it is not an isolated incident but a systematic problem (e.g., there is evidence in more than one report), the GLOBALG.A.P. Secretariat will automatically – without ISC evaluation – issue a Red Card.</p> <p>The ISC escalates the suspension into contract cancellation.</p> <p>The CB reports its immediate remedial action to the GLOBALG.A.P. Secretariat and, where applicable, to the benchmarked scheme/checklist owner.</p> <p>The AB is informed.</p>	CIPRO

Non-conformance	Example(s)	Sanction	KPI
Not participating in annual compulsory CB trainings	Scheme manager update (SMU) training, in-house trainer (IHT) update training	<p>A CB is obliged to pay the SMU training participation fee and receives no reimbursement of accommodation costs in the following year; for the IHT training or any other compulsory training, please refer to “GLOBALG.A.P. general regulations – Rules for certification bodies,” section 5.2.</p> <p>If a CB does not attend an obligatory training for two years in a row, this CB receives a Red Card; the AB is informed.</p>	CB Staff Qualification
Not following the qualification and/or training requirements	A CB auditor conducts a CB audit without passing the relevant obligatory online tests, provided that the tests are available in their working language; a CB auditor has not followed a mandatory online training.	<p>The respective CB auditor is blocked in the GLOBALG.A.P. IT systems; the CB audit does not count if conducted before the online training and/or test(s) were passed. The CB audit that was conducted prior to the completed online training/test is invalid and the CB shall repeat the same CB audit again. No backdating of the test date in the database will take place.</p> <p>If a CB auditor completed the online training/test with another CB or passed the corresponding test during a “face to face” training and failed to register it in time with the corresponding CB (because of, e.g., a version change), the GLOBALG.A.P. Secretariat will backdate the approval in the GLOBALG.A.P. IT systems (the date when a CB auditor passed the online training/test the first</p>	CB Staff Qualification

Non-conformance	Example(s)	Sanction	KPI
		<p>time) so that a certificate can be entered online. However, this case will be recorded for the KPI rating calculation under “Database Management.”</p> <p>(If the CB actively asked the GLOBALG.A.P. Secretariat for the recognition of CB auditor’s competences before the CB audit took place, the case is not recorded on KPI.)</p>	
<p>Insufficient cooperation during complaint management</p>	<p>No response to GLOBALG.A.P. official communications and/or complaints</p>	<p>The CBs shall follow the given deadlines, defined in the specific formal requests from the GLOBALG.A.P. Secretariat (e.g., emails from Complaint Management Officer).</p> <p>Please refer to “GLOBALG.A.P. general regulations – Rules for certification bodies,” section 11.3, where the sanction steps are described in detail.</p>	<p>Complaint management</p>
<p>Missing liability insurance</p>		<p>A notification via email shall be sent to inform the CB about the deadline of 10 working days to submit the missing evidence.</p> <ol style="list-style-type: none"> <li>1. If a CB has not responded in 10 days, the first reminder is sent out. The deadline given to the CB is another 10 working days.</li> <li>2. Should no proof of insurance arrive within this deadline, the second reminder with another 10 working days deadline is sent, along with the information on the</li> </ol>	<p>N/A</p>

Non-conformance	Example(s)	Sanction	KPI
		<p>contractual obligation according to the LCA, which obliges a CB to have a valid insurance policy as long as it is GLOBALG.A.P. approved. The following warning procedure will start if no proof of insurance is provided.</p> <p>3. After the end of the second reminder's deadline, a warning procedure (5 working days) is started as defined in "GLOBALG.A.P. general regulations – Rules for certification bodies," section 11.3.</p> <p>4. If after the second warning (another 5 working days) no valid proof of insurance is received from the CB, this is followed by a temporary suspension (Red Card) until the CB provides the GLOBALG.A.P. Secretariat with valid proof of insurance.</p> <p>The AB is informed of the Red Card and temporary suspension.</p>	
Missing CB approval	CB audits performed without CB approval for relevant scope/standard/product category/add-on	The conducted CB audit is invalid. The CB without official approval for the scope/product category and/or standard/add-on is fined €500; only an approved CB is allowed to repeat the CB audit.	Administrative Management

Non-conformance	Example(s)	Sanction	KPI
GRASP CB audit conducted in a country without a national interpretation guideline (NIG) without the prior approval of the GLOBALG.A.P. Secretariat	A GRASP CB audit has been conducted in a country without an NIG.	The conducted GRASP CB audit is invalid. The CB without official approval for the add-on is fined €500; only an CB auditor who is approved to conduct CB audits in the country without an NIG for the CB is allowed to repeat the GRASP CB audit.	Administrative Management
Incomplete or late upload of the certification data	Certificates not updated within 28 days; issuance of paper certificates without a prior database registration; sanctions not entered into the database in time; wrong product/incorrect quantity/incorrect certification scope certified in database; etc.	If the percentage of such cases exceeds 5% of the total number of certificate holders for that CB, then the sanction applies following “GLOBALG.A.P. general regulations – Rules for certification bodies,” sections 11.3.1 b) (iii), 11.3.2 b) (iii), 11.3.3 d) (iv), and 11.3.4 e) (iv), along with a €100 fine for every reached sanction level.  (If the correction requires the assistance of the customer support team, an additional administrative fee applies.)	Database Management for missing items  CB Audit Processing Time (Compliance with timelines) for late/delayed actions.
Incomplete or late upload of CB audit report and the checklist for GRASP	Late upload of the checklists, aquaculture license holders without GRASP, etc.	The GRASP general rules require the upload of the report within 28 days at the latest after the time period for corrective actions has expired (within 3 months of the initial or 28 days of the subsequent CB audit). If a CB does not follow this rule and uploads the GRASP CB audit checklist after this time frame, the GLOBALG.A.P. Secretariat imposes a fine of €150 on the CB. Payment of this fine will not extinguish the damages liability of the CB derived from the omission.	Database Management for missing items  CB Audit Processing Time (Compliance with timelines) for late/delayed actions.

<b>Non-conformance</b>	<b>Example(s)</b>	<b>Sanction</b>	<b>KPI</b>
Not implementing producer sanctions	A CB purposely does not sanction a producer.	The specific case may be detected via a CIPRO assessment and will be classified accordingly.  It can also be detected by receiving a complaint from a third party. In this case an investigation is necessary.	CIPRO, Complaint Management
Impartiality breach	CB provides consultancy services to producers.	The GLOBALG.A.P. Secretariat forwards those cases to the ISC and to the relevant AB immediately. This generally results in a Yellow Card or Red Card, but it also depends on the AB's resolution process.	N/A
CB and/or producers refusing CIPRO assessment on the planned days/week	Asking to change the week or to postpone the CIPRO assessment without clear important justification; not accepting another date suggestion for the same week	If the CIPRO assessment has to be rescheduled, it will no longer be considered a random monitoring assessment but a follow-up assessment. Therefore, the CB or producer (depending on the case) may be charged for the assessment days and the travel costs. The case will be forwarded to the ISC for not cooperating with GLOBALG.A.P.'s Integrity Program.  Any date change and justification must be supported with evidence.  The CIPRO assessment will not be scheduled during national holidays of the visited countries.	N/A

Note: Key Performance Indicators (KPI) are defined in "Certification Bodies Key Performance Indicators" in its current version.

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