GLOBALG.A.P. (EUREPGAP)

Integrated Farm Assurance Chain of Custody Control Points and Compliance Criteria

English Version Version 2.0-May08

Valid from 5th May 2008

The completion of the CoC Checklist is mandatory for GLOBALGAP Aquaculture certification. The CoC is in non-accredited status till further notice.



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INTRODUCTION

Principles

GLOBALGAP (EUREPGAP) offers several benefits to producers:

- 1. Reducing Food Safety risks in Global Primary Production
 - Clear risk assessed HACCP based reference standard serving the consumer and farmer
 - Commitment to continuous improvement and transparency through consultation and adoption of technical communication platforms across the entire food chain

2. Reducing Cost

- Avoiding the proliferation of buyer requirements, committed GLOBALGAP(EUREPGAP) Retailer and Food Service Members will shift their supply to GLOBALGAP(EUREPGAP) approved sources over time
- Avoid excess regulatory burden by pro-active adoption by industry
- Achieving global harmonisation leading to a more level playing field
- Farmers choose from certification bodies strictly regulated by GLOBALGAP(EUREPGAP)
- 3. Increasing the Integrity of Farm Assurance Schemes worldwide by
 - Defining and enforcing a common level of auditor competence
 - Defining and enforcing a common level of verification status report
 - Defining and enforcing a common level of action on non-compliances
 - Harmonising interpretation of compliance criteria

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INTRODUCTION (continued)

Independent Verification:

Farmers receive their GLOBALGAP(EUREPGAP) approval through independent verification from a verification body that is approved by GLOBALGAP(EUREPGAP).

The Scheme documents are:

- 1. GLOBALGAP(EUREPGAP) General Regulations which sets out the rules by which the standard will be administered.
- 2. GLOBALGAP(EUREPGAP) Control Points and Compliance Criteria (CPCC) is the standard with which the farmer must comply, and which gives specific details on how the farmer complies with each of the scheme requirements.
- 3. GLOBALGAP(EUREPGAP) Checklist which forms the basis of the farmer external audit and which the farmer must use to fulfil the annual internal audit requirement.
- 4. GLOBALGAP(EUREPGAP) Chain of Custody (CoC) to ensure that any product bearing an GLOBALGAP(EUREPGAP) label or sold as GLOBALGAP(EUREPGAP)-certified is produced from material that originates from certified GLOBALGAP(EUREPGAP) farms.
- 5. GLOBALGAP(EUREPGAP) Chain of Custody Checklist which forms the basis of the external audit and must be used to fulfil the annual internal audit requirement.

As described in GLOBALGAP(EUREPGAP) General Regulations, this scheme is divided into Major Musts, Minor Musts and Recommendations.

All control points must be audited. The possible answers are: compliance (yes), non-compliance (no) or Not Applicable (N/A). The N/A verdict cannot be given to those control points where the Compliance Criteria specify No N/A.

No matter what the required level of compliance is in GLOBALGAP(EUREPGAP), applicable legislation must be complied with in the country where the certified farmer is operating. Effectively legislation overrides GLOBALGAP(EUREPGAP) where legislation is more demanding. The compliance level is a "Major Must" in both events. Where there is no legislation(or legislation is not so strict), GLOBALGAP(EUREPGAP) provides a minimum acceptable level of compliance.

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Registration:

Please refer to the GLOBALGAP General Regulations Part I and Part I - Annex 3, for instructions on Registration and Certification process.

Definitions:

For clarification on the definition of terms used within this document, please refer to Part I - Annex 1 of the General Regulations.



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CHAIN OF CUSTODY

Guidance:

A traceability system is referred to the totality of data and operations that is capable of maintaining desired information about a product and its components through all or part of its production and utilization chain. Within the GLOBALGAP(EUREPGAP) Chain of Custody scope of compliance, all GLOBALGAP(EUREPGAP) certified products that changes legal ownership and/or is processed and/or is subject of outsourced processing, and are sold with the GLOBALGAP(EUREPGAP) claim, must be subject of compliance against the GLOBALGAP(EUREPGAP) Chain of Custody requirements.

Traceability systems contribute to the search for the cause of nonconformity and the ability to withdraw and/or recall products if necessary. The objective of these requirements is to ensure that any product sold as GLOBALGAP(EUREPGAP)-certified is produced from material that originates from certified GLOBALGAP(EUREPGAP) farms.

Chain of Custody controls must therefore be implemented at all critical control points in the process under assessment. Critical control points are those where there is a significant risk of certified materials becoming mixed with uncertified materials, under either normal or abnormal operating conditions.

Unless otherwise stated in the specific section below, Chain of Custody controls always consist of an APPROPRIATE COMBINATION of segregation and identification, to ensure that certified and uncertified materials are not mixed.

The choice of a traceability system is influenced by regulations, product characteristics and and customer expectations. A traceability system on ist own is insuficient to achieve food safety. Therefore, compliance of control point 3.2 of the Control Points and Compliance Criteria section is a Major Must, no N/A.

Chain of Custody audits and internal-assessments must be done when processing and relevant activities expected for GLOBALGAP(EUREPGAP) certified products take place.



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	Control Point	Compliance Criteria	Level
	Chain of Custody	•	•
1	Record Keeping and Internal Self Assessment		
1 . 1	Are all records requested during the inspection accessible and kept for a minimum period of time of two years unless longer requirement stated in specific control points?	Organizations keep up to date records for a minimum of two years, unless legally required to do so for a longer period. Retrospective records are not requested prior to application for GLOBALGAP(EUREPGAP) registration. New applicants must have full records for at least three months prior to the date of inspection. No N/A.	Major Must
1 . 2	Does the organization undertake a minimum of one self-assessment per year against the GLOBALGAP(EUREPGAP) Chain of Custody Standard?	Documentary evidence that the GLOBALGAP Chain of Custody internal self-assessment has been carried out annually at all sites must be available on each site handling products of GLOBALGAP(EUREPGAP) farms. No N/A.	Major Must
1 . 3	Has the internal self-assessment been documented and recorded?	The completed and documented GLOBALGAP(EUREPGAP) Chain of Custody inspection list must be available on the site handling products from GLOBALGAP(EUREPGAP) farms. No N/A.	Major Must
1 . 4	Are effective corrective actions taken as a result of internal self-assessment?	Effective corrective actions are documented and have been implemented. No N/A	Major Must
1 . 5	Have any minor must non-compliances that were detected externally in the previous inspection been addressed through the application of a corrective action plan designed to correct them?	The organization must show evidence that a plan has been designed and implemented for addressing the issues that led to the non-compliance being raised in the previous inspection and an improvement in the compliance of the respective points has resulted. Where the cause of the non-compliance is external to the organization, evidence of continued efforts to find a solution is available. No N/A unless this is the first inspection.	Major Must
2	Complaint Form		
2 . 1	Is there a complaint form available relating to issues of compliance with GLOBALGAP(EUREPGAP) Chain of Custody standard?	A clearly identifiable document for complaints relating to issues of compliance with GLOBALGAP(EUREPGAP) Chain of Custody standard is available on request. No N/A.	Major Must
2 . 2	Does the complaints procedure ensure that complaints are adequately recorded, studied and followed up including a record of actions taken?	There are documents of the actions taken with respect to complaints regarding GLOBALGAP(EUREPGAP) Chain of Custody standard deficiencies found in products or services. No N/A.	Major Must
3	Documented Control System		
	The organization is expected to show the assessor documentary evidence of compliance with all controls relevant to the chain of custody and legal food safety requirements. This must include written Chain of Custody procedures.		
3 . 1	Does the organization control all critical actions where mixture of GLOBALGAP(EUREPGAP) and non-GLOBALGAP(EUREPGAP) products could occur?	There are procedures, documented where necessary, and work instructions for all critical activities. All records are maintained relating to purchase, shipment, delivery, receipt, processing, waste, sales and invoicing for certified products. No N/A.	Major Must
3 . 2	Has the organization a working food safety system in place?	There are procedures, documented where necessary, and work instructions for all critical activities related to food safety. A HACCP Plan is operational and implemented effectively. No N/A.	



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	Control Point	Compliance Criteria	Level
3 . 3	Are procedures in place that describe how goods are returned and or rejected?	There are procedures, documented where necessary, and work instructions for products returned and/or rejected by clients. No N/A.	Minor Must
3 . 4	Is there a management representative who, irrespective of other responsibilities, has defined responsibility and authority for ensuring that the chain-of-custody is both implemented and maintained?	There is a management representative who, irrespective of other responsibilities, has defined responsibility and authority for ensuring that the chain-of-custody is both implemented and maintained. No N/A.	Major Must
3 . 5	Do all staff know and understand their specific responsibilities in relation to maintaining the chain of custody?	All staff know and understand their specific responsibilities in relation to maintaining the chain of custody. Written evidence is available as proof of staff training. No N/A.	Major Must
3 . 6	Are all personnel qualified to carry out their assigned tasks on the basis of: appropriate education, training and experience?	All personnel are qualified to carry out their assigned tasks on the basis of: appropriate education, training and experience.	Minor Must
3 . 7	Are training and experience records maintained, appropriate to the scale of the operation?	Training and experience records are maintained, appropriate to the scale of the operation.	Minor Must
4	Confirmation of Inputs		
	The organization assessed shall ensure that all products considered as GLOBALG sources, independant of product status, wheather they are purchased or subject of		
4 . 1	Do documents contain adequate information clearly describing the incoming product?	Documents contain adequate information clearly describing the incoming product, including: - A requirement that the product is GLOBALGAP(EUREPGAP) certified. - Product description, including packaging and condition requirements during transport and reception. - Product code, name or other positive identification. - Quantities input/output, for both processed and not processed product. No N/A.	Major Must
4 . 2	Are there documents and records to show that the selection of suppliers and purchasing activities are controlled?	Appropriate documentation is maintained to control the selection of suppliers and purchasing activities when product is purchased.	Major Must
4 . 3	Is there a purchasing and/or reception of product subject of outsourced processing procedure defined and implemented for GLOBALGAP(EUREPGAP) certified product to preserve the GLOBALGAP(EUREPGAP) identification?	The organisation being assessed has clearly defined purchasing and/or reception of product subject of outsourced processing procedures, appropriate to the scale of the operation, which ensure that when GLOBALGAP(EUREPGAP) certified product is being purchased or processed: - it is covered (or in process to be covered, e.g. coffee and tea processing units) by an GLOBALGAP(EUREPGAP) -endorsed certificate. - the certificate is valid. - the scope of the certificate covers the product being purchased. - if there is doubt about the validity of the certificate, contact the GLOBALGAP(EUREPGAP) organization.	Major Must
5	Separation and/or Demarcation of Certified and non-Certified Inputs		
	For each of the critical control points identified for the process, the organization being assessed shall ensure that there is an adequate combination of identification, segregation and documentation of certified and non-certified product to prevent uncontrolled mixing.		
5 . 1	Documentation		I
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	Control Point	Compliance Criteria	Level
5 . 1 . 1	Are appropriate identification procedures in place for identifying incoming products from different sources?	Procedures shall be established and maintained, appropriate to the scale of the operation, for identifying incoming products from different sources. No N/A.	Major Must
5 . 1 . 2	Are records kept of all incoming GLOBALGAP(EUREPGAP) certified products?	Records shall be maintained of all incoming GLOBALGAP(EUREPGAP) certified product including information on volumes or weight. No N/A.	Major Must
5 . 1 . 3	Are written procedures and work instructions in place for all critical control points?	Written procedures and work instructions, appropriate to the scale of the operation, shall be prepared and implemented which cover activities at all critical control points. No N/A.	Major Must
5 . 1 . 4	Are accurate production records kept to identify the source and quantity of the process input/output?	Accurate production records shall be kept from which it is possible to identify source and quantity of product input/output in the process. No N/A.	Major Must
5 . 2 .	Identification		
5 . 2 . 1	Are all product or containers with products originating from GLOBALGAP (EUREPGAP) certified farms clearly marked as such?	All product or containers with products originating from GLOBALGAP(EUREPGAP) certified farms are clearly marked as such. No N/A.	Major Must
5 . 2 . 2	Have, if appropriate, all raw materials, work in progress and finished goods a unique traceable identification number or mark?	Where appropriate, raw materials, work in progress and finished goods shall carry a unique identification number or mark. From this mark it is possible to trace the material to an GLOBALGAP(EUREPGAP)-endorsed source. No N/A.	Major Must
5 . 3	Segregation		
5 . 3 . 1	Is GLOBALGAP(EUREPGAP) certified product separately stored?	GLOBALGAP(EUREPGAP) Certified product is stored separately from non-certified material. No N/A.	Minor Must
5 . 3 . 2	Are production runs of certified and/or non-certified products segregated?	Production runs of certified and/or non-certified products are segregated physically or in time. No N/A.	Major Must
6	Secure Product Labelling		
6 . 1	Are labels, carrying the GLOBALGAP(EUREPGAP) name or logo, according the GLOBALGAP(EUREPGAP) rules and approved by the responsible certification body?	Labels carrying the GLOBALGAP(EUREPGAP) name or logo shall be designed in accordance with the rules laid down by GLOBALGAP(EUREPGAP), and submitted to the responsible certification body (CB) for approval before use. No N/A.	Major Must
6 . 2	When the GLOBALGAP(EUREPGAP) trademark or name is used, is this followed by the Chain of Custody certificate registration number of the user?	If the GLOBALGAP(EUREPGAP) trademark or name is used for marking of products which will be further processed under a subsequent GLOBALGAP(EUREPGAP) endorsed chain-of-custody certificate, the responsible CB chain-of-custody certificate registration number shall be included. No N/A.	Major Must



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	Control Point	Compliance Criteria	Level
7	Identification of Certified Outputs	·	
	The organization shall ensure that all certified products sold or leaving the processing outsourced are clearly identifiable as such.		
7 . 1	Are certified raw materials or products marked or labelled as such?	Certified products shall be marked or labelled in a way which clearly identifies them as certified. This is obligatory if consignments containing a mixture of similar certified and uncertified products are sold or leaving the processing outsourced. No N/A	Major Must
7 . 2	Are certified products segregated from similar uncertified products prior to dispatch?	Certified product shall be segregated from similar uncertified products prior to dispatch. No N/A	Major Must
7 . 3	Are procedures and work instructions in place to ensure that only certified products are dispatched to fill orders for certified products?	Procedures and work instructions shall be developed and implemented to ensure that only certified products are dispatched to fill orders for certified products. No N/A	Major Must
7 . 4	Do all sales documents include the chain of custody certificate number?	Sales invoices and, where appropriate, other documentation related to sales of certified material shall include the chain-of-custody certificate number. No N/A	Major Must
8	Records and Data		
8 . 1	Data Maintenance		
	The organization shall ensure that all records relevant to maintaining secure chain o	f custody are adequately prepared, used and maintained.	
8 . 1 . 1	Does the organisation establish and maintain the necessary procedures?	The organization shall establish and maintain procedures for the identification, collection, indexing, filing, storage, maintenance and disposition of all records relevant to chain-of-custody, appropriate to the size and complexity of the operation. As a minimum this shall include information on which records are stored, and for how long. No N/A	Major Must
8 . 1 . 2	Is the appropriate retention time for the records maintained?	Retention times for records relevant to chain-of-custody is defined to be at least 3 years. NA when just started.	Major Must
8 . 1 . 3	Are all records legible and systematic?	All records shall be legible. No N/A	Major Must
8 . 1 . 4	Do all records include the appropriate information?	Records shall include, as appropriate: - Purchase records including purchase orders, contracts, invoices and list of approved suppliers goods inwards notes and records of receipt inspections - Stock records of raw materials and finished product, including where appropriate annual stock taken results - Production records - Sales orders received and invoices issued by the organization being assessed. No N/A	Major Must
8 . 2	Input-output balance		
	The organization shall collect sufficient process information to demonstrate that the quantity of the output of GLOBALGAP(EUREPGAP) certified product (or in process of certification, e.g. coffee and tea processing units) is consistent with the quantity and processing yield of GLOBALGAP(EUREPGAP) certified product entering the process.		
8 . 2 . 1	Are all details of certified incoming product recorded?	Quantities of certified incoming, outgoing and stored product must be recorded and a summary produced on a regular basis so as to facilitate the auditing process. No N/A	Major Must



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	Control Point	Compliance Criteria	Level
8 . 2 . 2	Are conversion ratios (input-output calculations of a given production process) calculated and controlled?	Conversion ratios shall be calculated for each process. No N/A	Major Must
8 . 2 . 3	Are all sales details of certified products recorded?	Sales details of certified products shall be recorded, with particular attention to quantities sold and descriptions provided.	Major Must
9	Slaughter Operation (Section 9 is intended for aquaculture prod	ucts, when applicable)	
9 . 1	Stunning Method and Efficiency		
9 . 1 . 1	Are operatives trained in fish stunning practices? Are fish rendered into a state of unconsciousness that persists until death has occurred?	Visual inspection of harvest procedures and witness of harvests.	Minor Must
9 . 2	Bleeding Conditions		
9 . 2 . 1	Is the cause of death for the fish exsanguinations by bleeding? Is there in place a protocol for ensuring this monitoring?	The protocol to ensure that the cause of death for the fish will be exsanguinations by bleeding must be available for inspection. Staff must be able to demonstrate awareness at interview and where possible this is verified during the harvesting process by the auditor.	Major Must
9.3	Escapes and Indigenous Species		
9 . 3 . 1	Are effective measures in place to ensure there is no escape of farmed stock into the local watercourse, or ingress of indigenous species into the fish holding areas?	The Contingency Plans and records of all escaped fish for the previous twelve months and confirmation that they have all been reported to the authorities for all sites must be assessed.	
9.4	Mortality of livestock on the slaughterhouse facilities prior to slaughterhouse	er	
9 . 4 . 1	Does the organisation have a plan to monitor and record trends in mortality?	Site plans and records must be assessed.	Minor Must
9 . 4 . 2	For the legal disposal of large scale mortalities, is there a contingency /action plan in place in the event of a severe disease episode or mass mortality?	The Contingency/Action Plan must be assessed, and must comply with legal requirements where these exist. Staff must be able to demonstrate awareness at interview.	Minor Must
9 . 4 . 3	Are all mortalities recorded on removal from the fish holding area and reasons for death recorded, where known?	Records for cause of death must be assessed.	Minor Must
9.5	Fish welfare in pre-harvest holding facilities		
	Minimising stress of the fish immediately prior to slaughter is necessary to prevent w	relfare problems and to maintain product quality.	
9 . 5 . 1	Do all staff responsible for the reception of fish for harvest have appropriate training in fish welfare and the operation of live holding systems?	Staff must be able to demonstrate competence at interview. Training records and certificates, for each member of staff with allocated functions or jobs must be assessed.	Major Must
9 . 5 . 2	Is the condition of the fish monitored regularly prior to transfer to the point of harvest? Does unnecessary stress of the fish is avoided?	Records of monitoring must be assessed.	Major Must
9 5 3	Is the oxygen level of the holding areas controlled and recorded?	Document and records are on the site the control the oxygen level.	Minor Must
9 . 5 . 4	Are fish holding facilities NOT contaminated by blood water or factory effluent?	Fish holding facilities must NOT be contaminated by blood water or factory effluent. The records of waste disposal and collection facilities for wastes must be assessed.	Major Must