

GFSI Assessment Report



Application information

Assessment team and date

Certification programme / Standard* Name(s)	ASIAGAP (Asia Good Agricultural Practice)/ <ul style="list-style-type: none"> Control Points and Compliance Criteria for Fruits and Vegetables 2.3; Control Points and Compliance Criteria for Grains Ver.2.3; Control Points and Compliance Criteria for Tea Ver.2.3
Certification programme / Standard* owner name and address	Japan GAP Foundation Building 4F, 3-29 Kioicho, Chiyoda-ku, Tokyo (Japan)
Certification programme / Standard* owner name, email, contact number	Hiroshi Ogino, Executive Managing Director 荻野 宏 ogino@jgap.jp +81-3-5215-1112
Date of previous application if application	N/A
Benchmark Leader name and contact details	Moreno Giordani mgiordani@blu.it
GFSI Technical Manager name	Marie-Claude Quentin
Observers name	N/A
Interpreter's name (if applicable)	Kay Mioshi
Date of this office assessment	16, 17, and 18th June 2021
Language (e.g. English or other)	English (Japanese with Translator)

* Cross as appropriate

Scopes including in this application

GFSI Scopes		Scopes applied For
AI	Farming of Animals for Meat/ Milk/ Eggs/ Honey	
AIL	Farming of Fish and Seafood	
BI	Farming of Plants (other than grains and pulses)	X

BII	Farming of Grains and Pulses	X
BIII	Pre-process Handling of plant products	X
C0	Animal Conversion	
CI	Processing of perishable animal products	
CII	Processing of Plant Perishable Products	
CIII	Processing of Animal and Plant Perishable Products (Mixed Products)	
CIV	Processing of Ambient Stable Products	
D	Production of Feed	
E	Catering	
FI	Retail / Wholesale	
FII	Food Broker / Agent	
H	Provision of Food Safety Services	
G	Provision of Storage and Distribution Services	
I	Production of Food Packaging	
JI	Hygienic Design of Food Buildings and Processing Equipment (for building constructors and equipment manufacturers)	
JII	Hygienic Design of Food Buildings and Processing Equipment (for building and equipment users)	
K	Production of (Bio) Chemicals (Additives, Vitamins, Minerals, Bio-cultures, Flavourings, Enzymes and Processing aids)	

EXECUTIVE SUMMARY AND RECOMMENDATION TO THE BOARD

Executive summary

The purpose of the GFSI assessment was to evaluate the ASIAGAP programme (ASIAGAP General Regulation, Version 2.3 and ASIAGAP Control Points and Compliance Criteria for Fruits and Vegetables, Tea and Grains, Version 2.3), issued in October 2020, is in compliance with the GFSI Benchmarking Requirements 2020.1 version.

The assessment was made up of a preliminary Desk Review, completed remotely by the BL (Benchmark Leader) under the supervision of the GFSI STM (Senior Technical Manager) in April 2021, and was based on the review of the evidence provided by the certification programme owner in the self-assessment excel files for GFSI part II and III to cover the scope of recognition applied.

All findings raised, concerning the request of additional information and disagreements with the self-assessment of CPO, have been communicated in writing and discussed with the CPO during the review call in May 2021.

Despite several findings being highlighted, no critical findings or other impeding factors were raised at this step and the office assessment was scheduled by a specific agenda (Office Assessment Plan).

The office assessment was carried out in remote on 16, 17, and 18th June 2021 by the GFSI BL and achieved the main purpose of the remote visit which was to check the implementation of the new

requirements and the development of the certification programme owner's Integrity Programme through sample record reviews.

The findings emerged during the overall assessment have been discussed and summed up in a report (List of findings) approved by the Certification Programme Owner and the Benchmark Leader.

The CPO sent a corrective action plan on 2nd July 2021, some integration and evidence in August 2021.

The corrective actions proposed, the acceptance and the state of implementation are reported on the following pages (see table "List of issues raised").

Recommendation to the GFSI Board

(To be completed after public consultation)

RESULTS OF ASSESSMENT AND OFFICE VISIT

Time and location details

	Location	People present GFSI, consultant, CPO. Names and roles	Date and time
Self-assessment review		Moreno Giordani	2,5 days (Completed on 5 th May 2021)
Review calls		<ul style="list-style-type: none"> • Moreno Giordani • Marie-Claude Quentin • Hiroshi OGINO (Executive Managing Director) • Ryu IYODA (GM, OPERATION) • Hiroyuki MORITA (INTEGRITY) • Hitoshi SATO (BUSINESS PROMOTION) • Chieri IENAGA (BUSINESS PROMOTION) • Yumi AOYAGI (DEVELOPMENT) • Taro YOKOMIZO / Kumi NAKANISHI (INTEGRITY/DEVELOPMENT/DATABASE) • Kay Mioshi (Translator) 	10 th and 17 th May 2021 (1 day)
Office visit		<ul style="list-style-type: none"> • Moreno Giordani • Elisa Carlucci • Hiroshi OGINO (Executive Managing Director) • Ryu IYODA (GM, OPERATION) • Hitoshi SATO (BUSINESS PROMOTION) • Chieri IENAGA (BUSINESS PROMOTION) • Yumi AOYAGI (DEVELOPMENT) • Taro YOKOMIZO / Kumi NAKANISHI (INTEGRITY/DEVELOPMENT/DATABASE) • Kay Mioshi (Translator) 	16, 17, and 18 th June 2021 (2 days)

Overview

Japan GAP Foundation is a CPO providing a range of standards for the agricultural sector in Japan (JGAP and ASIAGAP) and overseas (ASIAGAP) for plants and animal products certification. The certification programme assessed for the GFSI Benchmarking is limited to the ASIAGAP certification scheme for sites producing and handling fresh fruits and vegetables, tea and grains. The Japan GAP Foundation (JGF), which originally was founded as a nonprofit organization in 2006, was incorporated on 5th January 2015. Its purpose is to develop Good Agricultural Practice (GAP) as a farm management norm for producing agricultural products needed by consumers, and to contribute to the establishment of sustainable agriculture and society with consideration of food safety, environmental conservation, occupational safety, etc.

The agricultural producer members of the Foundation on May 14th, 2021 are 277. The Foundation established a Technical Committee involved in the development of documents related to the management and operation of the ASIAGAP and JGAP certification programs. The technical committee chairman and technical committee members are appointed by the board of directors. The committee members were re-elected in 2020, and currently consist of three subcommittees: the Certification Program Subcommittee, the Agricultural Products Subcommittee, and the Livestock Products Subcommittee (only for JGAP).

The standards submitted to the benchmarking process is on version 2.3 (October 2020) which has been implemented since 1st November 2020.

The certification programme is designed to operate under product/process certification according to ISO 17065 accreditation and involves third party audit and certification of single and multisite farms and firms (group certification).

The evaluation activity is based on the audit of the effective practices/processes of the organisation by review of the procedural documentation, records and site inspections at the time of the audit.

The audit may be announced or unannounced according to the CB programme (unannounced minimum 10% of the certified organization per year).

The CPO is currently working with six Japanese Certification Bodies accredited by the national Accreditation Body (JAB), International Accreditation Forum (IAF) member and signatory of the Multilateral Recognition Arrangement (MLA).

The ASIAGAP standard is followed by over 495 certified organisations (on April 30th 2021) involving about 2408 farms, mainly in Japan (2 certificates issued in Thailand).

On April 2021, 13 organizations have been certified according to the new certification programme 2.3 (covering the following GFSI categories: 11 BI, 2 BII, and 12 BIII).

General compliance, strengths and weaknesses

The documental review was carried out by the Benchmark Leader during the months of April and May 2021. All the documental concerns have been discussed and clarified before the office visit on 16th-18th June 2021.

During the remote office visit, carried out using Zoom platform, the Benchmark Leader interviewed the JGF director and certification programme managers. The Benchmark Leader also reviewed documents, performance data and other management data.

Specifically, the Benchmark Leader examined the CPO management processes in relation to the main requirements described in GFSI Benchmarking Requirements Part II. Also, five certification files against the new version 2.3 have been reviewed off-line (asynchronous mode) and discussed during the remote office assessment.

To ensure stakeholder consultation, Japan GAP Foundation has implemented specific technical committees. The main stakeholders are represented by farmers, food factories, retailers and fruit and vegetable marketing associations.

Members are appointed by the Board of Directors to ensure representation (see list on the JGF web site).

The programme documents were submitted for 15 days public consultation from August 17 to 31st August 2020.

Subsequent meetings to answer the public consultation comments were carried out on -
September 7th, 2020 Certification Programme Subcommittee

- September 9th, 2020 Agricultural Products Subcommittee:

The Programme documents have been reviewed by the Board of Directors on 29/09/2020 and approved by the JGF President on September 30th, 2020.

The standards and regulation are available on the web site as a free download.

A total of fifteen “partial” findings and seven “No” findings against part II and a further three partial findings against part III were raised during the whole assessment.

The main findings regard the better definition and writing of the personnel qualification criteria and monitoring rules, the audit report writing, NCs closure, and several on multi-sites sampling criteria. Furthermore, two “no” findings were issued, during the remote office visit, regarding the implementation of the CPO Integrity programme

The main points of strength on the management of the Certification Programme are:

- adequate resources and a well-structured organisation;
- a long experience in the management of some national agricultural certification programmes;
- good communication with certification bodies, accreditation body, stakeholders and interested parties.

The main point of weakness concerns the implementation, only partial, of the Integrity Programme.

Changes made to the certification programme / Standard* following the GFSI assessment

The CPO, following the GFSI assessment, issued new draft versions of the General Rules and Standards.

The draft versions include all the revised requirements as discussed during the documental review and office visit.

The CPO following the GFSI Assessment, restarted the IP activities by office visit according to a new programme for the year 2021 in June.

A revision of the Integrity Programme procedure has been carried out to complete the modalities (e.g., monitoring of the audit reports).

A desktop IP assessment of the CB will be recorded, and the results will be communicated by the end of October 2021 (the evidence of communication of the IP results to the CBs will be presented within October 2021).

A thorough rewriting of the group certification requirements and a supplement to ASIAGAP General Regulations (Ver.2.3) req. 8.2(5)b) has been implemented (risk criteria for sampling, eligibility of the commodities etc.).

Revision of the standards requirements (ASIAGAP Control Points and Compliance Criteria) have been implemented (e.g., Food Safety Culture, Pest Monitoring).

The first corrective action plan was received on July 2nd, 2021 and, upon request of clarification, the final on August 3rd, 2021. The final CA plan is believed to be adequate to address the findings and present the corrective actions of the CPO with regard to the benchmark requirements.

The findings proposed corrective actions, acceptance and state of implementation are reported in table ‘List of Issues Raised’.

List of findings

Element reference	Non-conformity	Partly / no	Corrective action	Recommendation from Benchmark leader	Decision from GFSI technical manager
1.19	The documented complaint procedure (or its extract) is not available in the CPO website.	partly	A flow chart regarding the complaint procedure will be published on JGF HP in English and Japanese versions (By July 31, 2021).	The proposed action is adequate, and it will address the issue. 2021/08/03: evidence provided. "Statement of Complaint" (flow chart). published on the website. The corrective action is completed. Closed.	Corrective action appropriate and complete
3.10	No recent integrity programme risk-based activity carried out concerning the auditor witness assessment and office visit according to the Integrity Programme Procedure (Annex No.SA-E1) (e.g. last WA evidence on 2019-04-17).	No	We will conduct the office audit and witness audit for auditor assessment in accordance with the integrity program plan as per attached. (Annex No. ROV-1) The office audit for JMAQA on June 23 rd , 2021 has already been carried out as scheduled. We will submit the office audit report for JMAQA conducted on June 23 rd , 2021 by early October,2021	The proposed action is adequate, and it will address the issue. Evidence: "JGF Integrity operation plan 2021" on 2021/07/02 has been supplied. 2021/08/23: Evidence of the IP office audit carried out on June 23 rd , 2021, has been supplied <u>Evidence of further IP activities according to the plan 2021 will be verified within October 2021.</u>	Corrective action plan appropriate, implementation to verify

3.11	The results of the integrity programme are not communicated to and reviewed with the Certification Bodies at least once a year	No	The audit information reported by the CBs will be monthly put into the database we created, and those aggregated results of the audit information will be reported to each CB in this October in order to discuss its improvement (By Oct. 30 th 2021).	The proposed action is adequate, and it will address the issue. Evidence of communication and review with the CBs is required to close the finding. <u>Evidence will be reviewed within October 2021.</u>	Corrective action plan appropriate, implementation to verify
3.12	The desktop review programme does not include the assessment of the audit report records	partly	Sampling and evaluating the audit reports on a risk basis from the analysis results of the aforementioned aggregated results of audit information are implemented. Reporting the evaluation results to the CBs will be conducted in this October at the same time as reporting the aggregated results of the audit information (By Oct. 30 th 2021). We will submit “the revised integrity program procedure” by early October, 2021	The modalities about the sampling and evaluation for the “audit report” review is not defined. 2021/08/23: the IP draft procedure have been supplied and includes reference to the report review. The proposed action is adequate, and it will address the issue. <u>Evidence of implementation will be reviewed within October 2021.</u>	Corrective action plan appropriate, implementation to verify
4.5	The competence requirement of the personnel that carry out the technical review is not	partly	We will amend the GR 13.2(3)e) in the English version and clearly define the competence requirements of the TR (By July 31, 2021). We will send GR	The corrective action is acceptable. Evidence of the GR <u>final version</u> is required to close.	Corrective action plan appropriate, implementation to verify (publication of GR)

	clearly defined in the GR English version.		(draft version) including other items, altogether after August 2021.	2021/08/12: GR revised draft version supplied GR 13.2(3)e: the same competence of a senior auditor is required)	
4.6	The witness audit process to confirm acceptable auditor performance is not specified by the CPO.	partly	<p>We will propose to the Technical Committee for approval that the provisions of GR13.2(9) will be amended as follows.</p> <p>GR13.2(9) A certification body shall have a system in place to ensure that the contracted auditors shall conduct themselves in a professional manner. This system shall periodically evaluate the auditor into five grades from the personal attributes and behaviours, and not include the lowest ranking evaluation as its result. (And continue the provision until clause of a) to j)) (Schedule of normative amendment : Around late September, 2021)</p> <p>After the proposal to the Technical Committee for approval of the provisions of GR13.2(9) , we will amend as follows.</p> <p>GR13.2(9)</p>	<p>The evaluation wording "periodically" is too generic. A minimum frequency of the auditor <u>witness</u> evaluation shall be defined.</p> <p>2021/08/12: GR revised draft version supplied. GR 13.2.(9): WA to be carried out at least each 5 years.</p> <p>The corrective action is acceptable. Evidence of the GR <u>final version</u> is required to close.</p>	Corrective action plan appropriate, implementation to verify (publication of GR)

			<p>A certification body shall maintain a system to carry out the witness audit and evaluate for the auditors at least once in 5 years to ensure that the contracted auditors shall conduct themselves in a professional manner.</p> <p>This system shall require the record for advantageous points and points that need to be improved as the auditor from the viewpoint of evaluating the comprehension of ASIAGAP and the following personal attributes and behaviours.</p> <p>Regarding the points that need to be improved as the auditor, sufficient education or training shall be taken.....</p> <p>(And continue the provision until clause of a) to j))</p> <p>We will send GR (draft version) including other items, altogether after August 2021.</p>		
4.10	The requirement GR 13.2 does not explicitly ask for that at least one witness audit is carried out for the initial auditor qualification.	no	<p>We will amend the GR13.2(7) in the English version to clearly stipulate that the initial Auditor Qualification Requirements shall be conducted at least 3 witness audits evaluated by an ASIAGAP auditor or ASIAGAP</p>	<p>The corrective action is acceptable. Evidence of the <u>GR final version</u> is required to close.</p>	<p>Corrective action plan appropriate, implementation to verify (publication of GR)</p>

		<p>senior auditor (by July 31, 2021) We will send GR (draft version) including other items, altogether after August 2021.</p> <p>"We will amend the GR13.2(7) in the English version to clearly stipulate that the initial Auditor Qualification Requirements shall be conducted at least 3 witness audits evaluated by an ASIAGAP auditor or ASIAGAP senior auditor (by July 31, 2021)</p> <p>We have a misunderstanding between us. The corresponding GR for BR 4.10 is GR11.1.3(2) but GR13.2(7). When we submitted the Self-assessment form for the first time, we mentioned different parts as GR13.2(7). Thus, we modified GR11.1.3 (2) is the corresponding to BR 4.10 and update it to the GR as the below.</p> <p>GR11.1.3(2)</p> <p>The person must have audit records for at least three individual farm audits in the sector for which he or she is applying for registration.</p>	<p>2021/08/16: Clarification supplied on GR11.1.3(2):</p> <p>3 WA required for the initial auditor qualification.</p>	
--	--	---	---	--

			These audits shall be carried out based on the standard audit plan. Until completion of the registration of auditors, it is mandatory to hold the records, which are verified as sufficient for the evaluations for 3 witness audits assessed by the person who is qualified as an auditor or senior auditor, and to keep the records recognized as good."		
4.10.2	No requirement defined for how to carry out the witness audit as part of the CB's initial auditor qualification (e.g., following the standard audit plan etc.). Information provided only for the auditor qualification in case of ICT use.	partly	<p>We will amend the GR13.2(7) in the English version to clearly stipulate that the initial Auditor Qualification Requirements shall be conducted at least 3 witness audits evaluated by an ASIAGAP auditor or ASIAGAP senior auditor. (by July 31, 2021)</p> <p>We will amend GR11.1.3(2) as the follows after the proposal to the Technical Committee.</p> <p>GR11.1.3 (2) The person must have audit records for at least three individual farm audits in the sector for which he or she is applying for registration. These audits shall be carried out</p>	<p>Specific requirement on how the WA shall be carried out is not completely defined.</p> <p>2021/08/20: GR revised draft version supplied. GR11.1.3(2): 3 WA based on the standard audit plan required for the initial auditor qualification</p> <p>The corrective action is acceptable. Evidence of the GR <u>final version</u> is required to close.</p>	Corrective action plan appropriate, implementation to verify (publication of GR)

			<p>based on the standard audit plan. The record must be kept that the person has been assessed by assessor, who is the responsible auditor in charge till the completion of auditor registration, for three audits attended and assessed by auditor or senior auditor and recognized as performing well. (*) An audit out of three may be substituted by two or more site audits for different group certification.</p> <p>We will send GR (draft version) including other items, altogether after August 2021.</p>		
5.6	<p>The CPO rules allow notifications to the farm/group, which is chosen for the unannounced audit, within 48 hours prior to the audit. This notification is a short notice audit instead of an unannounced audit.</p>	partly	<p>We will propose to the Technical Committee for approval to delete the provisions of GR 8.10 (3) regarding the Unannounced Audit. (Schedule of normative amendment: Around late September 2021)</p> <p>We will send GR (draft version) including other items, altogether after August 2021.</p>	<p>The corrective action is acceptable. Evidence of the GR <u>final version</u> is required to close.</p> <p>2021/08/12: GR revised draft version supplied. GR 8.10.2: deleted the wording relative to “48 hours” short notice.</p>	<p>Corrective action plan appropriate, implementation to verify (publication of GR)</p>

5.12	It is not clear how the CPO ensures that rules for the appointment of auditors regarding impartiality, including rotation, are effectively defined and applied by the CBs.	partly	<p>We will propose to the Technical Committee to amend the provisions of GR 8.2 (1) for planning an audit and sampling as follows: GR8.2 (1) The CBs shall assign an auditor who meets the criteria in these regulations. The CBs shall establish the regulations regarding the assignment of auditors, including the rotation of auditors, in order to secure that the same auditor shall avoid conducting the same farm/group audit for four consecutive years to ensure fairness. (Schedule of normative amendment : Around late September, 2021)</p> <p>After the proposal to the Technical Committee to amend the provisions of GR 8.2 (1) for planning an audit and sampling, we will amend it as follows: GR8.2 (1) The CBs shall assign an auditor who meets the criteria in these regulations. The CBs shall establish the regulations regarding the assignment of auditors, including the rotation of auditors, in order to</p>	<p>The corrective action is acceptable. Evidence of the GR <u>final version</u> is required to close.</p> <p>2021/08/12: GR revised draft version supplied. GR 8.1.1: same auditor team to be no more than 4 consecutive years.</p>	Corrective action plan appropriate, implementation to verify (publication of GR)
------	--	--------	--	--	--

			<p>secure that the same auditor team (*1) shall avoid conducting the same farm/group audit for four consecutive years to ensure fairness. (*1) Even in the case of one person as auditor, we call it as auditor team.</p> <p>We will send GR (draft version) including other items, altogether after August 2021.</p>		
5.13	The timeline for the provision of the audit report is not defined	partly	<p>We will propose to the Technical Committee for approval that the following provisions shall be added to the provisions of GR8.3(3):GR8.3 Conducting an audit and receiving a corrective action report(3) The auditor shall record the audit result and make the audit report. The auditor shall report the audit results after the audit completion to the farm/group and shall request corrective actions to them for nonconformities after clearly and precisely written down on the audit report. The Certification Body shall develop the procedure for making the audit report taking into consideration that it might be translated to other languages. The auditor shall submit a list of</p>	<p>The corrective action is acceptable. Evidence of the <u>GR final version</u> is required to close.</p> <p>2021/08/12: GR revised draft version supplied. GR 8.3 (3): report to be provided within 10 business days from completion of the audit.</p>	Corrective action plan appropriate, implementation to verify (publication of GR)

			<p>nonconformities to the farm/group (auditee) at the end of the audit. The auditor shall submit the audit reports and checklists to the farm/group (auditee) within 10 business days of completion of the audit.(Schedule of normative amendment: Around late September, 2021). After the proposal to the Technical Committee for approval of the following provisions GR8.3(3), we will amend it as follows:GR8.3 Conducting an audit and receiving a corrective action report(3) The auditor shall record the audit result and make the audit report. The auditor shall report the audit results after the audit completion to the farm/group and shall request corrective actions to them for nonconformities after clearly and precisely written down on the audit report. The Certification Body shall develop the procedure for making the audit report taking into consideration that it might be translated to other languages. The auditor shall submit a list of nonconformities to the farm/group (auditee) at the end of the audit. The auditor shall submit the audit</p>		
--	--	--	--	--	--

			reports and checklists (*) to the farm/group (auditee) within 10 business days of completion of the audit. (*) Checklists means a list which the evidence of judgement of conformity or nonconformity and objective evidence are described. We will send GR (draft version) including other items, altogether after August 2021.		
5.15	The audit report does not incorporate a summary of each main section of the standard requirements.	partly	<p>As mentioned above BR5.13, we will propose to the Technical Committee to add the above provision to the General Regulations 8.3(3) for the purpose of approval. By the reason of a fact that the audit report and the checklist will be submitted to the farm/group (auditee), this enables us to provide evidence that all requirements in relation to main sectors have been evaluated by the checklist. (Schedule of normative amendment: Around late September 2021)</p> <p>We will send GR (draft version) including other items, altogether after August 2021.</p>	<p>The corrective action is acceptable. Evidence of the <u>GR final version</u> is required to close.</p> <p>2021/08/12: GR revised draft version supplied. GR 8.3 (3): report and checklist to be written within 10 business days from completion of the audit. Detailed Checklist is part of the report.</p>	Corrective action plan appropriate, implementation to verify (publication of GR)

5.17	It is not clear how the audit report gives evidence that all the requirements have been evaluated considering that the checklist is not part of the report. The audit report does not clearly express where the site complies. The number of NCs and % of compliance are not sufficient information by themselves.	no	<p>As mentioned above, we will propose to the Technical Committee to add the above provision to the General Regulations 8.3(3) for obtaining its approval. By the reason of a definitive fact that the audit report shall contain the checklist, this enables us to provide evidence that all requirements have been evaluated. (Schedule of normative amendment: Around late September 2021)</p> <p>We will send GR (draft version) including other items, altogether after August 2021.</p>	<p>The corrective action is acceptable. Evidence of the <u>GR final version</u> is required to close.</p> <p>2021/08/16: Clarification supplied. GR 8.3 (3): report and checklist supplied within 10 business days from completion of the audit.</p>	Corrective action plan appropriate, implementation to verify (publication of GR)
5.23	The requirements GR8.3 and 11.4 do not clarify that the person who carries out the verification of the correction/corrective action implementation (evaluation task) must not be involved in the technical review.	no	<p>We will propose to the Technical Committee to amend the provisions of GR8.4(1) and GR11.4 as follows: GR8.4 Review of Audit result, Certification decision, and issuance of the certificate (1) The CB shall review the audit report and judge the audit result. Audit reports shall be evaluated correctly to validate enough evidence for conformity of ASIAGAP. Those who have a conflict of independence and impartiality, including those who have audited farms/groups, shall not audit results</p>	<p>The corrective action is acceptable. Evidence of the <u>GR final version</u> is required to close.</p> <p>2021/08/16: Clarification supplied.</p> <p>GR 8.4 and 11.4: TR and DM must be different person from who conducted assessment activities.</p>	Corrective action plan appropriate, implementation to verify (publication of GR)

		<p>nor make a certification decision. In addition, those who review the audit report and make a certification decision shall not perform any activities that affect its independence and fairness. In particular, they cannot conduct consulting(*Note) nor sales activities such as selling goods to the audited farm/group, within three years before and after the date of review and certification decision. Those who review the audit report and make a certification decision shall not be identical with such a person who conducted its audit.</p> <p>GR11.4 Technical Reviewer The technical reviewer shall be a person who reviews audit results and has the competence to understand ASIAGAP standard documents, the audit reports, and requirements on completion of checklists, and evaluate the contents of the audit reports fairly and accurately.</p> <p>The technical reviewer shall not be identical with such person who conducted its audit.</p> <p>(Schedule of normative amendment: Around late</p>	<p>GR8.3(6), evidence of NC closure verified by "the person who conducted the audit."</p>	
--	--	---	---	--

		<p>September 2021)</p> <p>After the proposal to the Technical Committee for approval of the following provisions GR8.4 (1) and GR11.4, we will amend them as follows:</p> <p>GR8.4 Review of Audit result, Certification decision, and issuance of the certificate</p> <p>(1) The CB shall review the audit result and judge the audit result. Audit result shall be evaluated correctly to validate enough evidence for conformity of ASIAGAP. Those who have a conflict of independence and impartiality, including those who have audited farms/groups, shall not audit results nor make a certification decision. In addition, those who review the audit result and make a certification decision shall not perform any activities that affect its independence and fairness. In particular, they cannot conduct consulting(*Note) nor sales activities such as selling goods to the audited farm/group, within three years before and after the date of review and certification</p>		
--	--	--	--	--

			<p>decision. Technical reviewer, those who review the audit result and make a certification decision shall not be identical with such a person who conducted its audit.</p> <p>GR11.4 Technical Reviewer The technical reviewer shall be a person who reviews audit results and has the competence to understand ASIAGAP standard documents, the audit reports, and requirements on completion of checklists, and evaluate the contents of the audit reports fairly and accurately. The technical reviewer shall not be identical with such person who conducted its audit. (Schedule of normative amendment :Around late September, 2021)</p>		
5.24	No detail has been defined about the valid way to close the NCs in case the on-site follow-up audit is not carried out for the closure (e.g., submission of documental evidence of correction).	partly	<p>We will propose to the Technical Committee to amend the provisions of GR 8.3(6) as follows.</p> <p>GR 8.3 Conducting an audit and receiving a corrective action report (6) As a result of the audit, the farm/group shall conduct corrective actions against the non-conformity findings through the audit and shall submit the corrective action plan</p>	<p>The corrective action is acceptable. Evidence of the <u>GR final version</u> is required to close.</p> <p>2021/08/16: Clarification supplied</p> <p>GR8.3(6), evidence of NC closure (documents, photos etc.) to be</p>	Corrective action plan appropriate, implementation to verify (publication of GR)

		<p>and report to the CB. The CB shall verify the corrective action plan and the results of corrective action. The verification can be conducted in various ways, including the submission of documents and photographs and the use of ICT and so on, however, they should be reviewed by the reviewer appropriately and validly.... In the following cases, some cases can be acceptable to verify the contents of corrective action by the auditor on site: (Schedule of normative amendment :Around late September, 2021)</p> <p>We will amend GR8.3(6) as follows. (6) As a result of the audit, the farm/group shall conduct corrective actions against the non-conformity findings through the audit and shall submit the corrective action plan and report to the CB. The CB shall verify the corrective action plan and the results of corrective action. The verification can be conducted in various ways, including the submission of documents and photographs and the use of ICT and so on, however, they should be reviewed by the technical reviewer</p>	<p>verified by "the person who conducted the audit."</p>	
--	--	--	--	--

		<p>appropriately and validly.... In the following cases, some cases can be acceptable to verify the contents of corrective action by the auditor on site:</p> <p>We will send GR (draft version) including other items, altogether after August 2021.</p> <p>We modified the corresponding part of GR8.3(6), and we deleted the explanation as "the technical reviewer." and changed it to "the person who conducted the audit."</p> <p>GR8.3(6)</p> <p>After the audit, the farm/group shall conduct corrective actions against the nonconformities</p> <p>found through the audit and submit the corrective action plan and report to the certification body. The certification body shall verify the corrective action plan and the result of corrective action. Verification can be conducted in various ways, including the submission of documents, photographs, and the use of ICT, and so on, but they shall be reviewed by the person who</p>		
--	--	--	--	--

			conducted the audit appropriately and validly. In case of the following, the corrective action report shall be verified by the auditor on site:		
5.27	The requirement GR 8.8.1 consider only switch from certification body and does not consider the switch from certification programme (e.g., audit history, last unannounced audit etc.).	partly	<p>We will propose to the Technical Committee to amend the GR such as adding the provisions of b) to GR 8.8(1) Changing Certification Body.</p> <p>GR8.8 (1) When a farm/group wishes to change Certification Body b) When a certified farm/group transition the certification within GFSI approved certification programs, the CBs shall conduct an audit, taking into account at least former the audit history of the certified farm/group and the assessment of the previous unannounced audit. (Schedule of normative amendment :Around late September, 2021) We will send GR (draft version) including other items, altogether after August 2021.</p>	<p>The corrective action is acceptable. Evidence of the <u>GR final version</u> is required to close.</p> <p>2021/08/20: GR revised draft version supplied.</p> <p>GR8.8: reference to the organisation audit history in case of CP switch has been included.</p>	Corrective action plan appropriate, implementation to verify (publication of GR)

6.7	The requirement 8.2 does not report that only a small number of the sample sites may be audited prior to the central function.	partly	We will propose to the Technical Committee to amend the provisions of GR 8.2(5)a as follows. GR8.2(5)a Audit of the group administration The CBs shall conduct an audit of the group administration before conducting audits of farms and agricultural products handling facilities. However, it is possible for a CB that it could conduct the audit for the small numbers of sampling site before the group administration audit if it is necessary. (Schedule of normative amendment: Around late September 2021) We will send GR (draft version) including other items, altogether after August 2021.	<p>The corrective action is acceptable. Evidence of the <u>GR final version</u> is required to close.</p> <p>2021/08/12: GR revised draft version supplied.</p> <p>GR8.2 (5)a, admitted only a small number of audited farms before the central function.</p>	Corrective action plan appropriate, implementation to verify (publication of GR)
6.23	The risk category criteria for the site audit sampling are not clearly defined by a mandatory requirement.	partly	We will produce the supplemental document regarding GR8.2(5)b). (Draft is attached. Annex No. ROV-2) We will propose to the Technical Committee to add such the supplemental document in General Regulations, clearly stipulating classification of the risk categories, and amend the provision for which a sample of square roots enable to be calculated for each risk category. (Schedule of normative amendment :Around late September, 2021) After the proposal to the Technical	<p>The corrective action is acceptable.</p> <p>Evidence of the document final version is required to close.</p> <p>Evidence: Seen the section 1 of "Supplement to ASIAGAP General Regulations Ver.2.3 8.2(5)b) (Draft on July 2nd, 2021)</p>	Corrective action plan appropriate, implementation to verify (publication of GR)

			<p>Committee for approval of the supplemental document regarding GR8.2(5)b, we will amend the supplemental document regarding GR8.2(5)b① and GR8.2(5)b① as follows.</p> <p>GR8.2 (5) b) Audit of member sites 1) Sampling plan for the site The certification body shall make a sampling plan for the audit of the group's member farms based on the supplemental document regarding ASIAGAP GR Ver.2.3 8.2(5)b (Guideline) and the followings for the audit of the member sites • • •</p> <p>Viii The site to be selected is determined by the results of the internal audit of the organization and the risk analysis of the site.</p> <p>We will send GR (draft version) including other items, altogether after August 2021.</p>	<p>2021/08/16: supplied and <u>clarified</u> the document "Supplement to ASIAGAP General Regulations Ver.2.3 - 8.2(5)b" August 3rd, 2021, categorized such as guideline, but it is considered a mandatory document, according to the definition on GR 5.1(4).</p> <p>2021/08/12: GR revised draft version supplied.</p>	
6.24	The requirement 8.2.(5)b does not define that the selected sites are identified on the bases of the organization internal audit	partly	<p>We will propose to the Technical Committee to add the following provision (viii) to provision GR 8.2(5)b) for obtaining an approval: GR8.2(5) b) Audit of member sites</p>	<p>The corrective action is acceptable. Evidence of the <u>GR final version</u> is required to close.</p>	<p>Corrective action plan appropriate, implementation to verify (publication of GR)</p>

	findings and the site risk profile.		<p>1) Sampling plan for the member sites</p> <p>The CB shall make a sampling plan from the member sites which consist of the group for member site audits in the group audit based on the following. . . .</p> <p>(Viii) The site to be selected is determined by the results of the internal audit of the organization and the risk analysis of the site.</p> <p>(Schedule of normative amendment: Around late September, 2021)</p> <p>We will send GR (draft version) including other items, altogether after August 2021.</p>	2021/08/12: GR revised draft version supplied.	
6.28	No clear requirements about the eligibility of commodities (e.g., which are deemed high risk crops or activities). The Technical letter 21JGF118 is not clear about the eligibility and it is not defined as a requirement.	no	<p>We will produce the supplemental document regarding GR8.2(5)b) and will propose to the Technical Committee to approve the definition of high-risk crops and high-risk activities in the supplemental document. (Draft is attached. Annex No. ROV-2)</p> <p>(Schedule of normative amendment: Around late September 2021)</p> <p>We proposed to the Technical Committee to define the high-risk</p>	<p>The list of non-eligible high-risk products is limited to sprouts and does not include some other crops normally recognized as high risk (for e.g., the crops reported in the JGF Technical letter 21JGF118 for poisoning/pathogens risk).</p> <p>2021/08/16: supplied and <u>clarified</u> the document “Supplement to ASIAGAP General Regulations Ver.2.3 - 8.2(5)b)”</p>	Corrective action plan appropriate, implementation to verify (publication of GR)

			<p>crops. As the result of various opinions from its members, we reached at two conclusions for the supplementary document on GR8.2(5)b(Guideline)</p> <p>1.</p> <p>2(1) We decided to delete the Bean Sprouts and Pea Sprouts by the following reasons:1) They have no food poisoning incidences in the past. 2) They are the food materials to be eaten after cooked.</p> <p>2.</p> <p>2(2) The item's features and the activities which are considered as high risk</p> <p>Only the item itself doesn't have possess a high risk. Some of the item's features and some of production activities are considered to be high risk. Therefore, we have defined them as high-risk crops when both of the item's features and the production activities are combined. (We will send GR (draft version) including other items, altogether after August 2021.)</p>	<p>August 3rd, 2021, categorized such as guideline, but it is considered a mandatory document, according to the definition on GR 5.1(4).</p> <p>The document details commodities and processes to be considered high risk (Sprout, melons, leafy vegetables etc.).</p> <p>The corrective action is acceptable.</p> <p>Evidence of the document final version is required to close.</p>	
6.29	The programme does not define rules to audit all members in a defined	no	<p>We will produce the supplemental document regarding GR8.2(5)b) which stipulates the sampling audit against all necessary member sites</p>	<p>The corrective action is acceptable. Evidence of the GR final version is required to close.</p>	Corrective action plan appropriate,

	period, according to the risk of the commodity.		<p>within a defined period according to the classification of risk categories. We will propose to the Technical Committee to approve such the supplemental document. (Draft is attached. Annex No. ROV-2) (Schedule of normative amendment: Around late September 2021)</p> <p>We will send GR (draft version) including other items, altogether after August 2021.</p>	2021/08/05: supplied the document "Supplement to ASIAGAP General Regulations Ver.2.3 - 8.2(5)b)" August 3rd, 2021. All members must be audited within 5-10 years.	implementation to verify (publication of GR)
6.30	It is not clear how the unannounced audit sample size is determined by the risk of the commodity.	partly	<p>We will produce the supplemental document regarding GR8.2(5)b and will propose to the Technical Committee to determine the sampling size of the unannounced audit based on the supplemental document. (Draft is attached. Annex No. ROV-2)</p> <p>(Schedule of normative amendment: Around late September 2021)</p> <p>We will send GR (draft version) including other items, altogether after August 2021.</p>	<p>The corrective action is acceptable. Evidence of the GR final version is required to close.</p> <p>2021/08/05: supplied the document "Supplement to ASIAGAP General Regulations Ver.2.3 - 8.2(5)b)" August 3rd, 2021. The group unannounced audit must be within 20-25% according to the risk.</p>	Corrective action plan appropriate, implementation to verify (publication of GR)
BI, BII, BIII FSM 2	The standard does not clearly refer to all of the minimum elements of food	partly	We will propose to the Technical Committee to amend CPCC2.4.2 as follows.	The corrective action is acceptable. Evidence of the	Corrective action plan appropriate,

	safety culture (e.g., feedback from employees and performance measurements). Furthermore, the reviewed checklists/audit records do not supply exhaustive evidence of the compliance.		<p>CPCC2.4.2 "Top management shall conduct the following activities regarding the food safety culture for establishing, implementing and continuously improving the food safety management.</p> <p>(1) Education and training for the workers</p> <p>(2) Records of communication with the workers, workers' opinions and impressions.</p> <p>(3) Effect of efforts (Records of how workers made an effort for food safety.)</p> <p>(Schedule of normative amendment :Around late September, 2021)</p> <p>We will amend CPCC 2.4.2 (3) as follows.</p> <p>(3)Effect of efforts (Records of depth in understanding and complying with work procedure)</p> <p>We will send CPCC (draft version) including other items, altogether after August 2021.</p>	<p>Standards (Fruits and Vegetables, Grains and Tea) final version is required to close.</p> <p>2021/08/12: Fruit and vegetables, tea and grains CPCC (standards) revised draft version supplied.</p> <p>CPCC 2.4.2 details the minimum elements of the food safety culture.</p>	implementation to verify (publication of standards)
BI, BII GAP4.4.1	Some requirements of the CPCC chapter 25 are classified minor must. All the standard requirements related to GFSI	partly	<p>We will propose to the Technical Committee to amend the followings for obtaining its approval.</p> <p>Regarding the chapter 25, only sections</p>	<p>The corrective action is acceptable. Evidence of the Standards (Fruits and Vegetables,</p>	Corrective action plan appropriate, implementation to verify (publication of standards)

	requirements are not defined major must according to the CPO definition.		<p>CPCC25.1.2, 25.1.3, 25.2.1, 25.3.1 and 25.3.2 correspond to GFSI benchmark requirements, and thus, the level of CPCC25.3.2 will be modified from "Minor Must" to "Major Must".</p> <p>(Schedule of normative amendment :Around late September, 2021)</p> <p>We will send CPCC (draft version) including other items, altogether after August 2021.</p>	<p>Grains and Tea) final version is required to close.</p> <p>2021/08/12: Fruit and vegetables, tea and grains CPCC (standards) revised draft version supplied.</p> <p>CPCC 25.3.2 recategorized from "Minor Must" to "Major Must."</p>	
BIII GMP13	<p>The requirement CPCC 17.1 does not explicitly require the monitoring of the pest control measure.</p> <p>Furthermore, in one reviewed certification file the CB auditor consider compliant the no activation of the pest monitoring (n. Axxxxxxx6).</p>	partly	<p>We will propose to the Technical Committee to amend CPCC 17.1 as follows.</p> <p>(1) The farm shall conduct the food safety risk assessment including the monitoring the facilities against the entry or proliferation of pests (small animals, insects, and wildlife) at all sites and produce handling facilities that affect food safety and shall take the countermeasures. Risk assessment results and countermeasures taken shall also be recorded.</p> <p>(2) In the case of extermination, it shall be carried out in such a manner as that it does not affect food safety.</p> <p>(Schedule of normative</p>	<p>The records of the pest control monitoring are not explicitly required. 2021/08/12: Fruit and vegetables, tea and grains CPCC (standards) revised draft version supplied.</p> <p>CPCC 17.1 (1) now requires pest monitoring records.</p> <p>The corrective action is acceptable.</p> <p>Evidence of the Standards (Fruits and Vegetables, Grains and Tea) final version is required to close.</p>	<p>Corrective action plan appropriate, implementation to verify (publication of standards)</p>

		<p>amendment :Around late September, 2021)</p> <p>We will amend CPCC17.1(1) as follows.</p> <p>GR17.1(1) The farm shall conduct the food safety risk assessment including the monitoring the facilities against the entry or proliferation of pests (small animals, insects, and wildlife) at all sites and produce handling facilities that affect food safety, and shall take the countermeasures. Risk assessment results, countermeasures taken, and the results of the pest occurred shall also be recorded.</p> <p>We will send CPCC (draft version) including other items, altogether after August 2021.</p>		
--	--	---	--	--

RESULTS OF THE PUBLIC STAKEHOLDER CONSULTATION

(To be completed after public consultation)

List of findings – public stakeholder consultation

			Answer	Recommendation from Benchmark leader	Decision from GFSI technical manager