

Section 1 - Hazards and Risk Management System Requirements

Name of Certification Programme:

ASIAGAP 2.3

GFSI Benchmarking Requirements version 2020			CPO self assessment			Benchmark leader assessment	
element number	element name	requirement	Compliant Yes/No	supportive evidence reference	supportive evidence description	Compliant Yes/no	Benchmark leader's comment
HACCP 1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	yes	CPCC1.3.1(2)/4.1/4.2/5.1/5.2/5.3/5.4/5.5/5.5.1/5.6/5.7/5.8/5.9/5.10	ASIAGAP Control Points and Compliance Criteria (for Farms) Ver. 2.3(hereinafter called "CPCC") (1.3.1(2)) stipulates that as part of the farm management system, food safety management system that includes compliance with food safety legislation shall be developed, implemented, maintained, and continuously improved and based on the food safety risks of agricultural products. ASIAGAP CPCC for Fruits and Vegetables and ASIAGAP CPCC for Tea are the normative documents corresponds to the GFSI sector B I and B III. ASIAGAP CPCC for Grains corresponds to the GFSI sector B II. CPCC 4.1 through 5.10 stipulate that a HACCP system or HACCP-based system shall be in place that includes the 7 steps and 12 principles of HACCP and the prerequisites based on relevant law, CPCC 5.2 is stipulated based on procedure 1, CPCC 5.3 based on procedure 2 and 3, CPCC 5.4 based on procedure 4 and 5, CPCC 5.5, and 5.6 based on procedure 6, CPCC 5.7 based on procedure 7,8,9, CPCC 5.8 based on procedure 10, CPCC5.9 based on procedure 11, and CPCC 5.10 based on procedure 12. All the above make the system systematic. In addition, it is mentioned in CPCC 5.1 that the HACCP system shall be established including the measures against allergens.	yes	
HACCP 1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	yes	CPCC5.1 CPCC5.1	As specified in CPCC 5.1, ASIAGAP Ver 2.3 requires top management to implement a HACCP system or HACCP-based system that includes 7 principles and 12 procedures of HACCP and a prerequisite program based on relevant laws. and CCP5.1 also requires that the HACCP system shall be implemented in accordance with the Codex Alimentarius Commission's HACCP formulation methodology. As Codex HACCP we are referring to was updated from 2003 version to 2020 version, Both of the text of CPCC 5.1 and the reference written at the end of CPCC are revised as well.	yes	The reference to CODEX CXC 1-1969 rev.2003 should be updated to 2020 revision. Clarified
HACCP 1.2	Hazard and Risk management system	The scope of the Hazard and Risk Management System shall be defined per product / product category and / or per process or production step.	yes	CPCC1.1(2)/5.3/5.4/5.5/5.5.1	ASIAGAP CPCC, which stipulates GAP requirements including Hazard and Risk Management System is provided for three (3) agricultural categories, namely Fruits and vegetables (including sprouts, mushrooms.), Grains, and Tea as each of them has its distinguished features. ASIAGAP CPCC for Fruits and Vegetables and ASIAGAP CPCC for Tea are the normative documents corresponds to the GFSI sector B I and B III. ASIAGAP CPCC for Grains corresponds to the GFSI sector B II. The requirements are stipulated per process or production step. CPCC 1.1 (2) requires the specification of the product, and CPCC 5.3 requires the documentation of specifications for each product or product group. (1) Product name or product group name (2)Inputs of adequate quality for the intended use (soil, water, seed and seedlings, materials, etc.) (3) Cultivation trimming, and shipping method (4) Intended food safety uses and users (5) Acceptable levels of food safety hazards in agricultural products (agrochemicals, radioactive materials, heavy metals, microorganisms, foreign objects, etc., if official standards and criteria are clear) (6) Storage conditions, shelf life, and delivery conditions (7) Contents of labelling CPCC 5.5 requires that the predicted food safety hazards for each production process be extracted and listed according to the flow diagram of the production process required in CPCC5.4. CPCC5.5.1 make it farmers' duty to specify the produce-specific food safety hazard, its specific samples are described in line with the type of agricultural produce.	yes	

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HACCP 1.3	Hazard and Risk management system	The Hazard and Risk Management System shall be applicable to the site's scope of certification.	yes	CPCC1.1/1.3.1	CPCC 1.1 stipulates that the farm management system shall cover the following 7 items, and it can be identified that the scope of the system covers the entire farm site. (1) Farm (farm name, address, contact information) (2) Product (agricultural product, item (being grown or to be grown)) (3) Sector (4) Site (field name, etc., location, area, products grown) (5) Storage (name of warehouse, location, stored items (materials such as agricultural chemicals and fertilizers, fuel, machinery, etc.)) (6) Agricultural produce handling facilities (identification of facility name, etc., location, items handled) (7) Subcontractors (name, outsourcing process, location, contact information) CPCC 1.3.1 stipulates that a food safety management system including eight items shall be developed, implemented, maintained, and continuously improved based on the safety risks of agricultural products. The farm management system shall be identified as being inclusive of the food safety management system.	yes	
HACCP 1.4	Hazard and Risk management system	The Hazard and Risk Management System shall be reviewed regularly, and in case of any change that impacts food safety.	yes	CPCC5.10(1)/5.10(2)/2.4.4	CPCC 5.10(1) specifies that the risk management for food safety in CPCC 5.2 through 5.9 shall be reviewed and updated by the HACCP team at least annually or whenever changes occur that could affect the food safety of the product, such as process changes. In addition, CPCC5.10(2) stipulates that the results of the review in CPCC5.10(1) shall be recorded and used as input to the review of the HACCP-based system in the lines of requirement by CPCC 2.4.4	yes	

Section 2 - Food Safety Management System Requirements

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ASIAGAP 2.3

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FSM 1	Management responsibility	A clear organisational structure identifying the job functions and responsibilities of at least those employees whose activities affect food safety shall be established, implemented and maintained.	yes	CPCC2.1/2.1(2)	CPCC 2.1 requires development of an organizational chart that identifies the management, the person responsible for product management, the person responsible for the management of the facility handling the agricultural products, the person responsible for fertilizer management, the person responsible for agrochemical management, the person responsible for occupational safety, and the person responsible for labour management. The person responsible for food safety should also be included and clearly identified in the organization chart. In addition, CPCC 2.1(2) requires that farm management grants authority to each person responsible and clearly identifies which control point in this standard they are responsible for.	yes	
FSM 2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	yes	CPCC1.3.1/2.4.2/2.4 CPCC2.4.2	CPCC1.3.1 stipulates the general requirements for food safety management system and its establishment, implementation, maintain and continuous improvement. In order to develop a food safety culture throughout the organization in CPCC 2.4.2, it is specified that top management shall communicate with workers, conduct education and training for workers, monitor the implementation status of procedures related to food safety, and conduct a review the result of internal audit by top management as specified in CPCC 2.4. CPCC2.4.2 stipulates that the senior management can acquire the feedback from workers by the method of communication with workers. The measurement of each worker performance also becomes possible by grasping the situation on how the state of implementation of process concerning food safety is complied with.	partly	Food Safety Culture elements concerning feedback from employees and performance measurement are not clearly provided. The standard does not clearly refer to all of the minimum elements of food safety culture (e.g. feedback from employees and performance measurements)
FSM 3	Management review	The senior management shall review all elements of the Food Safety Management System, including the Hazard and Risk Management System HACCP plan or HACCP-based plans regularly, and in case of any change that impacts food safety, to ensure their continuing suitability and effectiveness.	yes	CPCC2.4.4	CPCC 2.4.4 requires top management to review the HACCP-based system at least annually to ensure the continued suitability, adequacy, and effectiveness of the HACCP-based system stipulated in CPCC 5.1. When it occurs any changes that affects food safety, HACCP-based system and food safety management procedures, including prerequisite programs, required to be reviewed. It stipulates that the review shall include consideration of amendments to the farm management manual, including the food safety management system.	yes	
FSM 4.1	Food safety legislation	Procedures shall be established, implemented and maintained to ensure compliance with applicable legislation (both countries of production and intended sale).	yes	CPCC1.3.1/2.2 CPCC3.3(3) CPCC8.2.1(2) CPCC10.1.1.1 CPCC11.8 CPCC15.1(1) CPCC16.1.2 CPCC18.2 CPCC23.3 CPCC24.1.2(2) CPCC24.1.2(3) CPCC25.1.3	CPCC 1.3.1 requires that the farm has a food safety management system that is based on the safety risks for the agricultural produce and it is developed, implemented, maintained, and continuously improved that is required the farm itself to examine and make efforts to comply with its own relevant laws and regulations. CPCC 2.2 requires that top management shall document and disseminate a food safety policy in the farm and a policy for farm operations that includes compliance with laws and regulations and continuous improvement of farm management, and requires top management to take the lead in ensuring that compliance with laws and regulations is disseminated throughout the farm through continuous improvement. The list of legislation of the production and intended sale countries are as follows. CPCC3.3(3) Maintenance of documents and records : Required if the storage period shall excess more than 2 years by the law. CPCC8.2.1(2) Reaction to nuclear disaster : Required if there exist the administrative regulation on crop cultivation and product shipment. CPCC10.1.1.1 Appropriate labeling : To label with an indication in accordance with the food regulation in the country of destination to be shipped. CPCC11.8 Possession of official qualification : To hold an official qualification or completion of a training course regulated by the law. CPCC15.1(1) Notification or designation for the safety of the soil by the government CPCC16.1.2 The water used in the handling process : The drinkable water approved by the government shall apply to the edible fresh product. CPCC18.2 Analytical equipments : To implement the calibration to be verified by the domestic or international standard or method CPCC23.3 Genetically modified crop : Cultivation in conformity with the governmental instruction, Varieties approved by the government, Sales and labeling in conformity with the governmental instruction. CPCC24.1.2(2) Selection of agrochemicals: The usage plan complying with the regulations on use of agrochemicals in the country of production CPCC24.1.2(3) In case of exporting the produce, banning the use of agrochemicals which are prohibited to be used by the government restriction in the export country CPCC25.1.3 Safety of fertilizers : Required to confirm the safety, excepting for the fertilizers passed the official standard of the government.	yes	Please, mention some other requirements concerning the compliance with the legislation of the production and intended sale countries. Mentioned
FSM 5	Food Safety Management system	The elements of the Food Safety Management System shall be established, implemented, maintained and continuously improved and shall have a scope appropriate to the range of business activities to be covered.	yes	CPCC1.1/1.3.1/2.4.3	In line with CPCC1.1, the scope of the farm management system, the entire business activities of the farm can be grasped by area. CPCC 1.3.1 requires to designate a food safety management system including the following 8 items, and it is established, implemented, maintained, and continuously improved based on the safety risks for the produce in the farm management system. As a result, the elements of the food safety management system are established, and the system is designed to be implemented, maintained, and continuously improved. (1) Identification of the applicable scope of the food safety management system (2) Compliance with laws and regulations related to food safety (3) Identification of the processes required for the food safety management system (4) Determine the sequence and interaction of processes (5) Determine the criteria and methods to ensure effective operation and control of the processes (6) Securing the resources and information necessary to support the operation and monitoring of the process (7) Evaluating, monitoring, and analysing the actions needed to achieve planned results and continuous improvement (8) Implementing procedures to validate the food safety management system to ensure that the system remains effective. And CPCC 2.4.3 requires top management to determine and provide the necessary and appropriate resources at the appropriate timing to implement, maintain, and improve the farm management manual, including the food safety management system, and it also requires active management support.	yes	
FSM 6	Food safety policy and objectives	A clear, concise and documented food safety policy statement shall be in place, as well as measurable objectives specifying the extent of the organisation's commitment to meet the food safety needs.	yes	CPCC2.2/2.2.1	CPCC 2.2 clearly requires top management's commitment to develop and document, "a food safety policy" and "a policy for farm management" that includes compliance with laws and regulations and continuous improvement rule and to disseminate this policy throughout the farm. CPCC 2.2.1 requires that management shall establish "measurable food safety objectives" with respect to "the food safety policy" which is required in CPCC2.2.	yes	
FSM 7.1	Food defence	A food defence threat assessment procedure shall be established, implemented and maintained to identify potential threats and prioritise food defence measures.	yes	CPCC6.1 (1)	CPCC 6.1(1) requires that the organization shall have a food defence plan which is documented, implemented, and recorded assessment procedures to identify and prioritize responses to threats to food.	yes	
FSM 7.2	Food defence	A documented food defence plan shall be in place specifying the measures implemented to mitigate the public health risks from any identified food defence threats.	yes	CPCC6.1 (2)	CPCC 6.1(2) requires a documented plan that specifies measures to mitigate the identified threats in CPCC 6.1(1).	yes	
FSM 7.3	Food defence	This food defence plan shall be supported by the Food Safety Management System.	yes	CPCC6.1 (3)	CPCC 6.1(3) requires that food defence plan shall be incorporated into the food safety management system and is being implemented.	yes	

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FSM 8.1	Food fraud	A food fraud vulnerability assessment procedure shall be established, implemented and maintained to identify potential vulnerability and prioritise food fraud mitigation measures.	yes	CPCC6.2 (1)	CPCC 6.2(1) requires that the farm shall implement procedures of assessment which shall be documented, implemented, and recorded to identify and prioritize potential vulnerabilities to food fraud, including falsification of records and labelling and intentional contamination of produce.	yes	
FSM 8.2	Food fraud	A documented food fraud plan shall be in place specifying the measures implemented to mitigate the public health risks from the identified food fraud vulnerabilities.	yes	CPCC6.2 (2)	CPCC 6.2(2) requires that the farm shall implement the food fraud plan to be documented that specifies measures to reduce food safety risks which was identified as food fraud vulnerabilities stipulated in CPCC 6.2(1).	yes	
FSM 8.3	Food fraud	This food fraud mitigation plan shall be supported by the organisation's Food Safety Management System.	yes	CPCC6.2 (3)	CPCC 6.2(3) requires that the farm shall implement food fraud mitigation plan to incorporated into the farmer's food safety management system and is being implemented.	yes	
FSM 9.1	Documentation requirements	A procedure shall be established, implemented and maintained for the management and control of documented information required to demonstrate the effective operation and control of processes and the Food Safety Management System.	yes	CPCC1.3/1.3.1/1.4/1.5/1.6/3.3	CPCC 1.3 requires that the farm shall establish a farm management system and implement it as a farm management manual for ASIAGAP requirements, and requires the establishment of documented procedures that meet all the requirements of the ASIAGAP program. CPCC 1.3.1 requires the farm to establish a food safety management system, and it shall be implemented, maintained, and continuously improved based on the safety risk assessment of the produce in the farm management system, thereby creating a system in which the elements of the food safety management system are established, implemented, maintained, and continuously improved. CPCC 1.4 requires the indispensable conditions for the designation or revision of the farm management manual, and CPCC 1.5 requires that the person in charge of the farm review the farm management manual, and that the top management support the improvement of the farm management manual and record the contents. CPCC 1.6 requires that the revised version be able to be identified as old or new, and that the revised version be explained to workers so that they understand it. CPCC 3.3 requires the organization to designate the management procedures for keeping documents and records necessary for demonstrating conformity to ASIAGAP certification program.	yes	
FSM 9.2.1	Documentation requirements	All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the shelf-life of the food if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.	yes	CPCC3.3(3)/3.3(4)	CPCC3.3(3) stipulates the farm shall keep the records, when a law or customer requires any record to be kept for more than two years, or agricultural produce to be on the shelf at the retail exceeding two years. CPCC3.3(4) stipulates the farm shall maintain an appropriate management of documents and records, and further requires that they shall be maintained in a state where they can be used promptly as needed.	yes	
FSM 10.1	Specified requirements / Specifications	Specified requirements or specifications shall be established, implemented and maintained for all inputs to the process, including services that are purchased or provided and have an effect on food safety.	yes	CPCC7.2.3	CPCC 7.2.3 requires that the documented specifications of purchasing and provided services are maintained and that risk assessment, and the selection are in place to find there is no problem on food safety. It also requires that risk assessment and the selection are conducted when there is alteration in purchasing and provided services.	yes	
FSM 10.2	Specified requirements / Specifications	A review process of the specified requirements or specifications shall be in place.	yes	CPCC7.2.3 (2) /(3)	CPCC 7.2.3 (2) and (3) require that the farm shall conduct the risk assessment and the selection to find there is no problem on food safety from the purchasing and provided services. Such is also required to be done when there is an alteration.	yes	
FSM 11	Procedures	Effective procedures and instructions shall be established, implemented and maintained for all processes and operations having an effect on food safety.	yes	CPCC1.3/1.3.1	CPCC1.3 requires that a farm management system has been established and documented in a farm management manual which stipulates how to implement the farm management required by ASIAGAP. CPCC 1.3.1 requires that a farm management manual (including a food safety management system) is developed, or revised according the following procedures. (1) Identify the scope of application of the food safety management system (2) Comply with laws and regulations related to food safety (3) Identify the processes required for the food safety management system (4) Determine the sequence and interaction of processes (5) Determine the criteria and methods to ensure effective operation and control of the processes (6) Securing the resources and information necessary to support the operation and monitoring of the process (7) Evaluating, monitoring, and analysing the actions needed to achieve planned results and continuous improvement (8) Implement food safety management system verification procedures to ensure the system remains effective	yes	
FSM 12	Resource management	The resources needed to establish, implement, maintain, review and improve the Food Safety Management System shall be identified and assigned.	yes	CPCC2.4.3	CPCC 2.4.3 requires top management to determine and provide, in a timely manner, the qualified resources (including suitably qualified personnel) that are necessary to implement, and improve the farm management manual, which includes the food safety management system.	yes	
FSM 13.1.1	Purchasing and supplier performance	Purchasing processes shall be controlled to ensure all inputs to the process, including externally purchased materials and services which have an effect on food safety, conform to specified requirements or specifications as well as food safety and regulatory requirements.	yes	CPCC7.2/7.2.2/7.2.3	CPCC 7.2 stipulates the management of suppliers and service providers. CPCC 7.2.2 requires the procedures for credibility assessment, selection, and monitoring of the suppliers and service providers, which have an impact on the safety of produce. This includes emergency procurements. When resuming business with certain suppliers, such suppliers are reassessed and selected, and the result of the reassessment the selection are recorded. CPCC 7.2.3 requires the maintenance of documented specifications for all purchasing and provided services which have effect on food safety, and seeks to ensure the adequacy of the purchasing process by verifying that specifications are conformity.	yes	
FSM 13.2.1	Purchasing and supplier performance	A procedure for the evaluation, approval and continued monitoring of suppliers which have an effect on food safety shall be established, implemented and maintained. The procedure shall address procurement in emergency situations to ensure that food still conforms to the documented specified requirements or specifications, and the supplier has been evaluated. The results of evaluations, investigations and follow up actions shall be recorded.	yes	CPCC7.2.2	CPCC 7.2.2 requires documented procedures for credibility assessment, selection, and monitoring of the suppliers and service providers which have an impact on the safety of produce. This includes emergency procurement. The results of the assessment, selection, and monitoring shall be recorded. When resuming business with certain suppliers, such suppliers are reassessed and selected, and the result of the reassessment the selection shall be recorded.	yes	
FSM 13.3	Purchasing and supplier performance	Outsourced processes that may have an effect on food safety shall be identified and controlled. Such controls shall be documented in the Food Safety Management System.	yes	CPCC7.1/7.1.1/7.1.2	CPCC 7.1 stipulates the management for the subcontractors. CPCC 7.1.1 requires farms to have a contract between the farm and the subcontractors. The contract document includes the following 6 provisions, and CPCC 7.1.2 requires the farm verifies the subcontractor's compliance with the rules established in the contract at least once a year, and the result is recorded.	yes	
FSM 14.1.1	Traceability	Procedures shall be established, implemented and maintained to ensure product identification from the supplier (minimum one step back) through any processes undertaken to the recipient of the food (minimum one step forward).	yes	CPCC10.1.2/10.1.3/10.2/TeaCPCC10.1.2/TeaCPCC10.1.3/TeaCPCC10.1.4/TeaCPCC10.1.5	As for the vegetables, CPCC10.1.3 requires harvesting records with their harvesting process, CPCC 10.1.2 requires a shipping record which has detectable harvesting lot, or detectable storage lot connecting with the harvesting lot which connect the shipment of a product (unrefined tea) with its manufacturing process. Therefore, a series of continuous traceability is ensured from the field to shipment. As for the tea, TeaCPCC 10.1.5 requires harvesting record which the fresh leaves are picked up, and TeaCPCC10.1.4 requires unrefined tea's manufacturing records which has detectable harvesting lot(picking up the fresh leaves). TeaCPCC10.1.2 requires unrefined tea's shipping record which has detectable unrefined tea's manufacturing lot. Therefore, a series of continuous traceability is ensured from the field to shipment. In case of fresh leave's shipment, not unrefined tea, TeaCPCC10.1.3 requires fresh leave's shipment record which has detectable harvesting lot(picking up the fresh leaves). The traceability for fresh leaves are ensured under TeaCPCC10.1.3. As for the vegetables and tea, CPCC10.2 requires identification control and measures for cross contamination. This requirement also ensures the traceability.	yes	
FSM 14.2	Traceability	Documented tests of the traceability system shall be undertaken to ensure this is operating effectively.	yes	CPCC10.5	CPCC 10.5 requires that, at least once a year, information on shipment of products shall be traced back to the field, and material purchase which was used in the field and their suppliers be identified, and that the test results and the effectiveness of the traceability function shall be verified and recorded.	yes	

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FSM 16.1	Allergen management	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, implemented controls to reduce or eliminate that risk, and labelling of the food in compliance with the allergen labelling legislation in the country of intended sale.	yes	CPCC17.9/10.1.1(2)	CPCC17.9 stipulates that an allergen management plan shall be developed at all agricultural produce handling facilities. This also stipulates risk assessments of cross-contacts with allergens and the procedures and the management methods to reduce or eliminate the cross-contact. CPCC10.1.1(2) requires all the products to be shipped that intentionally or potentially include allergic substances shall be confirmed to be labelled in accordance with the labelling regulations for allergens of the country of destination.	yes	
FSM 17.1	Control of measuring and monitoring equipment / devices	The equipment / devices used to measure parameters critical to ensure food safety shall be identified.	yes	CPCC18.2(2)/8.1(3)	CPCC18.2 (2)requires the development of a list of equipment and devices required for measuring the items which are judged to be necessary to keep food safety under CPCC5.3 and 5.7. The devices that require calibration are regularly calibrated in under the verifiable domestic or international standard method with a consistent and reliable manner. CPCC 8.1(3) requires the specification of equipment that is necessary for the inspection to ensure analysis of inputs that effect on food safety.	yes	
FSM 17.2	Control of measuring and monitoring equipment / devices	The identified equipment / devices shall be regularly calibrated; calibration shall be traceable to a national or international standard or method.	yes	CPCC18.2	CPCC 18.2 requires that equipment shall be regularly checked to be ensured they can test, measure, or sort accurately for ensuring food safety. And the devices that required for calibration are regularly calibrated in under the verifiable domestic or international standard method for the equipment/device required for measuring the items which are judged to be necessary to keep food safety under CPCC 5.3, and CPCC5.7.	yes	
FSM 18.1.1	Product labelling and product information	Finished product shall be labelled to ensure safe use of food, in compliance with the applicable food safety legislation in the country of intended sale.	yes	CPCC10.1.1.1	CPCC10.1.1.1 requires an appropriate labelling on the product conducted by the farm, and the farm shall confirm the product to be shipped is labelled in accordance with the food regulations of the country of destination.	yes	
FSM 19.1	Testing	A procedure shall be established, implemented and maintained to ensure that analyses of food parameters critical to food safety are undertaken by competent laboratories and using appropriate sampling and testing methods and that such analyses are performed in accordance with the applicable requirements of ISO/IEC 17025.	yes	CPCC7.2.1	CPCC 7.2.1 requires that the farm shall confirm that the laboratory that conduct food safety analysis of agrochemical residue, water quality, heavy metals, microorganisms, and radioactive substances, performs in alignment with the requirements applicable to ISO17025.	yes	
FSM 19.2	Environmental monitoring	A risk-based approach shall be in place to define the microbiological environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.	yes	CPCC17.12/17.6	CPCC17.12 requires environmental motoring of produce handling facilities and a documented environmental monitoring plan which includes details of verification methods and the frequency of their implementation. This plan requires to be incorporated into the food safety management system. With regard to prevention of contamination and cross-contamination and mixing of foreign matters at the produce handling facility stipulated in CPCC17.6, those targets are agricultural produce, packaging materials, machinery, equipment, transportation vehicles, containers, and tools and so on. Implementation of a whole part of the above control points mitigate the risk of food contamination.	yes	
FSM 20	Internal audit	An internal audit procedure shall be established, implemented and maintained; it shall cover all elements of the Food Safety Management System.	yes	CPCC2.3	CPCC2.3 requires that internal audit is scheduled and conducted accordingly at least once a year, and the results shall be recorded. It also requires that Internal audit shall be conducted by a person who sufficiently understand ASIAGAP and that the implementation of corrective actions against non-conformity pointed out is recorded.	yes	
FSM 21	Complaint handling	A procedure for the management of complaints and complaint data shall be established, implemented and maintained to ensure that complaints are assessed and corrective actions implemented, when necessary.	yes	CPCC9.1.1/9.1.2	CPCC9.1.1, requires that a written effective incident management procedures shall be established for handling the cases of complaints and abnormalities of products. Product abnormalities include serious accident or incident, which might provoke serious accident, related to the safety of harvested produce, agricultural products under preparation, or shipments. The procedures shall include the measures how to identify the situation, its impact, investigation of causes, and to take corrective actions. Therefore, the farm, following the procedure is able to assess the compliant. It also stipulates that plan for practice run for product recall to confirm the effectiveness of control procedure. In addition, CPCC 9.1.2 requires that a record show that the farm handled complaints abnormalities of products according to the procedures established in CPCC9.1.1.	yes	
FSM 22	Serious incident management	An incident management procedure, including product recall and withdrawal, shall be established, implemented and maintained. The recall procedure shall be regularly tested for effectiveness.	yes	CPCC9.1.3/9.1.1	CPCC9.1.3 requires that the farm shall conduct a practice run for product recall based on CPCC 9.1.1(8) assuming occurrence of product complaint or abnormality at least once a year and records the result. It also requires the farm shall review the procedures for handling complaints and abnormalities of products which is established in CPCC 9.1.1. Product abnormalities include serious accident and incident, related to the safety of harvested produce, agricultural products under preparation, or shipments. All 8 provisions under 9.1.1 are required to be included in the procedures. If the farm follows all elements of the procedures, it will enable the completion of the complaint/abnormality action.	yes	
FSM 23	Product release	A product release procedure shall be established, implemented and maintained.	yes	CPCC8.3 (1)	CPCC 8.3(1) requires that the farm shall develop a documented procedures to sort and identify agricultural produce that meets the product specifications from agricultural produce that does not.	yes	
FSM 24.1	Control of non-conformity	A procedure shall be established, implemented and maintained to ensure that any non-conformity impacting food safety and any non-conforming products are clearly identified and controlled to prevent unintended use or delivery.	yes	CPCC8.3(1)(2)/9.1.1/9.1.2	CPCC 8.3(2) requires that the farm shall sort the conformity produce and non-conformity produce for the agricultural produce specification and control non-conformity product to the procedure stipulated in CPCC 8.3(1). Furthermore, if the non-conformity product could be a significant impact to the food safety and quality control, the farm shall take a next action according to the procedures under CPCC9.1.1 and 9.1.2.	yes	
FSM 25	Corrective actions	A procedure shall be established, implemented and maintained for the determination and implementation of corrective actions in the event of any significant non-conformity relating to food safety.	yes	CPCC9.1.1/9.1.2	CPCC9.1.1 and 9.1.2 stipulates that there exists the procedure to manage against complaints and abnormalities and that 8 provisions mentioned in CPCC 9.1.1 are clear in the document. CPCC9.1.1(6) stipulates that written procedure includes the reporting to the Foundation, and CB in case the illegalities are found. Furthermore, CPCC 9.1.2 requires that records shall be identified that the farm handled complaints and abnormalities of products according to the procedures required in CPCC 9.1.1.	yes	

Section 3 - Good Industry Practices Requirements

Name of Certification Programme:

ASIAGAP 2.3

GFSI Benchmarking Requirements version 2020			CPO self assessment			Benchmark leader assessment	
element number	element name	requirement	Compliant Yes/No	supportive evidence reference	supportive evidence description	Compliant Yes/no	Benchmark leader's comment
GMP 1	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination.	yes	CPCC17.6(1)	CPCC17.6(1) stipulates the farm shall implement risk assessments of contamination, cross-contamination and mixing of foreign matters at the produce handling facility, and it also requires countermeasures as a result of risk assessment which enable to manufacture the product preventing from contamination and minimizing the risk of food safety.	yes	
GMP 2	Local environment	All grounds within the site shall be maintained to prevent contamination and enable the production of safe products.	yes	CPCC16.3(1)/16.3(2)/17.6(1)	CPCC16.3(1) requires that the farm shall be equipped with the proper drainage facilities at the produce facilities. CPCC16.3(2) requires that the farm shall manage the polluted water(wastewater) from the sites and the produce handling facility and remove the plant residue and the wastes contained in the wastewater, to maintain the quality of water used in the cultivation process. CPCC17.6(1) stipulates the farm shall implement risk assessments of contamination, cross-contamination and mixing of foreign matters at the produce handling facility, and it also requires countermeasures as a result of risk assessment which enable to manufacture the product preventing from contamination and minimizing the risk of food safety.	yes	
GMP 3	Site design, construction, layout and flow of operations	The site, both the exterior and the interior, shall be designed, constructed and maintained to minimise food safety risks. The layout and flow of operations shall be suitable for the intended purpose and designed to minimise food safety risks.	yes	CPCC17.6(1)/17.8/TeaCPCC 17.6.1	CPCC17.6(1) stipulates the farm shall implement risk assessments of contamination, cross-contamination and mixing of foreign matters at the produce handling facilities. CPCC17.8 stipulates that designing, executing construction and scheduled maintenance shall be conducted for the food safety related facilities and their adjacent area, taking followings into consideration. (1)Satisfactory maintenance of hygiene control including protection against cross contamination between and during operations. (2)Proper cleaning and pest control. The proper layout of machinery, facility, appliance in a building shall be considered. Tea CPCC17.6.1 stipulates at the entrance to the manufacturing area, a sign indicating that captive foot wear is required, because no one may enter the area where refined tea is manufactured with the one's shoes on.	yes	
GMP 4.1	Product contamination risk and segregation	Procedures shall be established, implemented and maintained to prevent or minimise risk of contamination and cross-contamination of purchased materials, work in progress, rework, packaging and finished product covering all aspects of food safety.	yes	CPCC4.1 CPCC17.4 CPCC17.5 CPCC17.6	CPCC4.1 requires that a prerequisite program shall be established, implemented and maintained. Conditions of sites, facilities, machinery, infrastructure and equipment shall be confirmed and inspected to be suitable to secure and maintain food safety. CPCC17.4 requires that a risk assessment for contamination shall be implemented at least once a year, and its relevant procedures shall be determined, documented and implemented to reduce the risk of physical, chemical and biological product contamination. According to the procedures, agricultural products shall be properly maintained, stored in designated areas, handled in an appropriate condition with the following points, and all such the results of risk assessment shall be eventually recorded. i) CPCC17.5 requires that the farm shall be prevented from contamination and cross-contamination in the sites and storage places ii) CPCC17.6 requires that the farm shall be prevented from contamination and cross-contamination in the produce handling facilities.	yes	Please, also mention other requirements regarding the prevention of contamination and cross-contamination. Mentioned
GMP 5	Employee facilities	Employee facilities including hand washing and toilet facilities, and public facilities where applicable, shall be provided, designed and operated to minimise food safety risks.	yes	CPCC13.3.1/13.3.2/17.3	CPCC13.3.1 requires that hand-washing facilities shall be located near toilet and the produce handling facilities. They shall be kept hygienic and shall equipped with hygienic water and shall supply for soaps, towels, and disinfectants. As for the toilets, CPCC 13.3.2 requires that they shall be regularly cleaned and maintained in a hygienic manner. Filth and sewage from the toilets shall be disposed appropriately and do not contaminate the sites, facilities, or water canals of the farm. For employee facilities, CPCC 17.3 requires that the farm shall designs, provides, and operates the facilities(including the ones for public) such as the changing room and a place for the workers to keep their valuables to minimize the risk of food safety.	yes	

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GMP 6.1	Personal hygiene, protective clothing and medical screening	Documented personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.	yes	CPCC13.1/13.2/17.6.2	CPCC 13.1 requires that the farm shall have and implement a procedure to check the health condition, including the one affects food safety of workers and visitors, It also stipulates the procedure disease or its symptom shall be promptly reported to farm manager in line with the legal restrictions of a nation or region.CPCC13.2 stipulates that the rules of entering or working in the site. These 2 CPCCs define hygiene regulations for workers and visitors. As for sprout, CPCC17.6.2 stipulates implementation of the produce handling process of sprouts complies with the follows. (1) Stool analysis (including Salmonella and enterohemorrhagic E. coli) is conducted for workers at least once a year. (2) There is a disinfection tank for feet at the entrance of the produce handling facility, and the disinfectant in the tank is kept at an effective concentration. (3) Microbial analysis of the produce is conducted at least once a month. If E. coli is detected, the analysis of E. coli needs to be conducted at least once a week, and Salmonella group bacteria and enterohemorrhagic E. coli also need to be included in the analysis. The farm must revise and improve its hygiene procedures, and analysis must be continued weekly until the negative result of above-mentioned bacteria can be confirmed on a consistent basis and the improved hygiene procedures are properly implemented. (4) The workers can change shoes and wash hands at the doorway of the toilets. There is a countermeasure to prevent contamination from the urine drainage outlet.	yes	
GMP 6.2	Personal hygiene, protective clothing and medical screening	Suitable protective clothing shall be provided to minimise food safety risks.	yes	CPCC13.2	CPCC 13.2 requires that the farm shall stipulate the documented rules on hygiene management to minimize the food safety risks. The rules request the farm, as mandatory requirement for, providing, fitting and cleaning of working clothes, caps, masks, shoes, and gloves and personal belongings.	yes	
GMP 6.3	Personal hygiene, protective clothing and medical screening	A medical screening procedure shall be established, implemented and maintained to identify conditions impacting food safety and that any person affected shall immediately report illness or symptoms to management, subject to legal restrictions in the country of operation.	yes	CPCC13.1(1)(2)	CPCC 13.1 (1) requires that farm shall have a procedure to check the health condition, including the one affects food safety, of workers and visitors and such is implemented. CPCC13.1.1 (2) stipulates that the farm manager, following the above (1), prohibits the persons who are suffering from or understood or suspected to be carriers of the disease which are might be contagious by agricultural produce prohibits entering into or work at the area of producing , harvesting, and food handling facilities.	yes	
GMP 6.4	Personal hygiene, protective clothing and medical screening	The requirements 6.1, 6.2, and 6.3 shall apply to employees, contractors and visitors commensurate to their impact on food safety.	yes	CPCC11.9/13.1/13.2	CPCC11.9 requires that the farm shall stipulate the rules on workers safety, food safety and environment etc. for visitors to respect. CPCC13.1 and CPCC13.2 in order to secure food safety, requires the farm to stipulate 1)the procedure to confirm health condition and counter measures against disease for workers and visitors, 2) the rules for the entry to the production area.	yes	
GMP 7	Training	Procedure shall be established, implemented and maintained to ensure that all employees are trained, and retrained as necessary to have an understanding in food safety, commensurate with their activity.	yes	CPCC11.1/11.2/11.3/11.4/1.5/11.6/11.7/2.4.2	CPCC11.1,11.2,11.3,11.4,11.5, and 11.6 require that each responsible person for product management, fertilizer management, agrochemical management, and worker safety, and labour management study ASIAGAP CPCC and become capable to explain it. Those persons are required to improve their knowledge by obtaining qualifications on training from qualified persons. CPCC11.7 requires the implementing of training to the workers. CPCC2.4.2 requires that the top management shall conduct communication and training with and for the worker, in order to cultivate awareness towards food safety throughout the organization.	yes	
GMP 8.1.1	Housekeeping, cleaning and disinfection	Procedure of housekeeping, cleaning and disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a food safety risk.	yes	CPCC20.3	CPCC20.3 requires that 1) the farm shall have procedures to keep its sites, storage and produce facilities and their area kept tidy, in order, swept, cleansed and sterilized. 2) It shall check the implementation of procedure, verify an record the effectiveness for reduction and elimination of food safety risks. 3) Furthermore the farm let such cleansing operation avoid food safety risks to be brought. The series of requirement and procedures mentioned above one stipulated as a housekeeping cleaning and disinfection program.	yes	
GMP 8.2	Housekeeping, cleaning and disinfection	Cleaning facilities, equipment and chemical materials shall be suitable for their intended use and shall be stored and used appropriately.	yes	CPCC18.4/18.4 (4)	CPCC18.4 requires that the farm shall stipulate a documented procedure to reduce the contamination risk of the produce. It requires that there one stipulation for cleaning tools -separate storage to clean the goods used in the harvesting process and produce handling process. -regular check and in placement -appropriate storage in hygienic manner. -Appropriate management of the cleaning agents and disinfects is also required to be stipulated. CPCC18.4(4) requires that the cleaning agents and disinfectants shall not pose any risk to food safety, shall be suitable for purpose of usage, used before their effective expiry("use-by") date, and stored safely in a designated place.	yes	

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element number	element name	requirement	Compliant Yes/No	supportive evidence reference	supportive evidence description	Compliant Yes/no	Benchmark leader's comment
GMP 10	Site inspections / checks	A programme of site inspections / checks shall be established, implemented and maintained to ensure the site environment and processing equipment are maintained in a suitable condition to ensure food safety, as applicable to the activity of the site.	yes	CPCC4.1	CPCC4.1 requires that the farm has established, implemented, and maintained a prerequisite program for the sites, machinery, infrastructure and equipment which are confirmed and inspected to be suitable to secure and maintain the food safety.	yes	
GMP 11	Air and water quality	Air, compressed gases, and water (including ice and steam) in any form which could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	yes	CPCC16.1.2/16.1.3/16.1.5/17.6(4)/TEACPCC16.1.3	CPCC16.1.2 requires that the farm shall conduct hygiene management of the water used in the produce handling facilities, and conduct the water analysis once a year, and confirm that there is not detectable for E. coli in the water. CPCC 16.1.3 stipulates the preclusions for stored water and recycled water. CPCC16.1.5 requires that any measures are taken to prevent the tank, container, or reservoir from becoming a source of contamination of water or agricultural produce when stored water is used in the reduction process. CPCC17.6(4) stipulates that air and compressed gas which might affect food safety have to be periodically checked and properly controlled and handled in order to minimize the risk on food safety. As for the tea, TEACPCC16.1.3 stipulates that fresh leaves must not be contaminated by the washing water, if they are washed.	yes	
GMP 12.1	Waste management	A procedure shall be established, implemented and maintained for the collection, storage and disposal of waste material, including waste water and drainage.	yes	CPCC20.1/16.3	CPCC20.1 requires that the farm shall be aware of the wastes from the field and the produce handling facility, and the storage and disposal methods of the wastes shall be documented. CPCC16.3 requires that the farm shall be equipped the proper drainage facilities at sites and the produce facilities. It also requires that the farm shall manage the polluted water(wastewater) from the sites and the produce handling facility and remove the plant residue and the wastes contained in the wastewater, to maintain the quality of water used in the cultivation process.	yes	
GMP 13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	yes	CPCC17.1/TeaCPCC17.1.1	CPCC17.1 requires that the farm shall conduct the food safety risk assessment against pests (small animals, insects, and birds), countermeasures, and keep the records of such risk assessment and countermeasures. As for the tea, TeaCPCC17.1.1 requires that the farm shall take measures to prevent insects attracted by the light from getting into the manufacturing facilities at night. CPCC17.1 requires that such the management for all the sites and produce handling facilities at which affect food safety shall be implemented.	partly	The pest monitoring is not explicitly required for the site premises. The monitoring of the pest control measure is not explicitly required. (Note: the new GFSI requirement for BIII is more detailed than BI and BII).
GMP 15	Transport	All containers and vehicles used for transportation in a way that could impact food safety shall be designed, constructed and maintained to minimise food safety risks. They shall be suitable for the intended purpose	yes	CPCC18.1.1	CPCC18.1.1 requires that all containers and vehicles, including subcontracted vehicles, used for transporting harvests (including packaging materials) and shipments are suitable for the purpose of transporting agricultural products and are kept clean to prevent cross-contamination to minimize the food safety risks.	yes	
GMP 16.1	Storage	Food shall be held or stored in designated areas and handled under controlled conditions to minimise food safety risks.	yes	CPCC17.4	CPCC 17.4 stipulates that a risk assessment for contamination shall be implemented at least once a year, and procedures shall be determined, documented and implemented to reduce the risk of physical, chemical and biological product contamination. It also stipulates that agricultural products shall be maintained and stored in designated areas, handled in an appropriate condition such the results of risk assessment shall be recorded. This control point varies by the type of agricultural produce, and it stipulates the different requirements complying with vegetables and fruits, tea, grains.	yes	
GMP 17	Stock management	A procedure shall be established, implemented and maintained to ensure that purchased materials, work in progress and finished products are used in the correct order, and within the allocated shelf life when applicable.	yes	CPCC17.4(4)	CPCC 17.4 (4) stipulates that consideration for storable duration of produce is made and standard operation procedure to define appropriate order for handling shall be prepared and conducted accordingly.	yes	
GMP 18	Equipment	Equipment shall be suitable for the intended purpose. Equipment shall be designed, constructed, maintained, used and stored to minimise food safety risks.	yes	CPCC17.8	CPCC 17.8 stipulates that designing, executing, construction and scheduled maintenance are conducted for the food safety related facilities and their adjacent area are taken the followings into consideration. (1) Satisfactory maintenance of hygiene control including protection against cross contamination between and during operations. (2) Proper cleaning and pest control. The proper layout of machinery, facility, appliance in a building shall be considered. Maintenance operations shall also be conducted to minimize the food safety risks.	yes	
GMP 19	Maintenance	Effective planned maintenance shall be in place for the site and equipment to minimise food safety risks. Maintenance activities shall not represent food safety risks.	yes	CPCC17.8/18.1(2)/18.1(3)	CPCC17.8 requires that maintenance operation shall be conducted to minimize the food safety risks. CPCC18.1 (2) stipulates that the machinery, equipment, and vehicles shall be checked, maintained, cleaned, washed, and maintenance record shall be made and kept. CPCC18.1(3) stipulates that the machinery, equipment, and vehicles shall be stored so that they do not affect food safety.	yes	