

Comparison GTP Rules of Certification 1.3 and EFISC-GTP Rules of Certification V4.0 – 02.05.2017

GTP RoC	Subject and text	EFISC-GTP RoC	Subject and text
1	<p>Audit scope of the GTP Code</p> <p>The GTP Code is property of COCERAL and applies to companies complying with the following definition: An operator whose activity consists of collecting, storage, trading and transport of namely cereals, oilseeds, protein crops and other plant products as well as by-products resulting from them intended for food and/or feed, destined to professional users (farmers or stock breeders), manufacturers of primary processing (maltsters, millers, feed compounders...) or other traders. Road and/or water transport as unique activity cannot be certified according to this scope where, collecting, storage or trade of the listed products, are pre-requisite. The Code applies to all operators collecting, storing, trading and transporting in or with Europe.</p>	1.1 1.2	<p>General Introduction</p> <p>EFISC-GTP is a voluntary feed/food safety assurance scheme developed by Starch Europe (European starch industry), FEDIOL (European oil seed and protein meal industry), COCERAL (European association representing the trade in cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agro supply), EBB (European biodiesel industry) and Euromalt (European malt industry) in order to establish a certifiable European Code to good practice for the collection, transport, storage, trading and industrial manufacturing of safe feed/food ingredients. The EFISC-GTP Code, Rules of Certification and sector documents are managed by the EFISC-GTP Aisbl secretariat. EFISC-GTP Aisbl provides the standards and framework for independent, approved third party certification of feed/food safety management systems based on ISO/IEC 17021-1:2015 and ISO/TS 22003:2013. EFISC-GTP is a feed/food ingredients operator standard. The objective of EFISC-GTP certification is to form part of the verification of Good Practices along the whole production chain. EFISC-GTP is a business-to-business tool and is therefore not directly visible to the final feed/food products. The EFISC-GTP logo and trademark have restricted use. Participation is voluntary and based on objective criteria. EFISC-GTP Aisbl is not discriminatory to certification bodies and/or feed/food ingredients operators. The terms 'EFISC-GTP and 'EFISC-GTP Aisbl' are used interchangeably in this document.</p> <p>EFISC-GTP Terms of Reference</p> <ul style="list-style-type: none"> ■ To respond to consumer concerns on feed/food safety in order to restore confidence. ■ Encouraging adoption of commercially viable HACCP-based feed/food safety management schemes, which promote the safe production of feed/food ingredients within Europe and worldwide. ■ Promoting the best use of sector specific knowledge and experience in PRP and HACCP implementation. ■ Providing guidance for continuous improvement by corrective measures. ■ Establish a harmonised, single, recognised framework for independent third party verification. ■ Communication and consulting openly with all actor groups. <p>EFISC-GTP, the European Feed/food Ingredients Safety Certification, is a set of normative documents, setting out the requirements for applicants participating in the EFISC-GTP certification. The EFISC-GTP Aisbl certification program is one mean of providing assurance that an operator has implemented EFISC-GTP in line with its policy and in a uniform way. The only valid versions of EFISC-GTP and its certification rules are the English versions, published on the EFISC-GTP Aisbl web site (www.EFISC-GTP.eu). The English language edition of this and other normative EFISC-GTP documents are the original editions. EFISC-GTP documents might be translated into other languages and published on the EFISC-GTP Aisbl website. Once published, these official EFISC-GTP documents will be the only ones that may be used for EFISC-GTP certification in that language. Translated documents will be identified as having normative status after a thorough translation review. Until the translations reach the normative status, the sentence "please refer to the English version in case of doubt" will be written on each sheet of the translated documents, in the respective language. Accreditation may be sought and obtained by certification bodies in other languages only against documents with normative status recognised in this way.</p>
2	<p>General requirements</p> <p>The Certification Body must be able to prove by all means that it informed the candidates to Certification that the implementation of the requirements of the GTP Code can in no way substitute the compliance with any regulation in force, neither national nor European. The Certification Bodies must ascertain that GTP auditors are approved by and comply with the requirements for auditors laid down further below in section 6. The Certification Body must undertake to take part at least once a year in the meetings of the GTP Harmonisation Committee established by COCERAL. The Certification Body must have a written agreement with each operator to be audited and certified.</p>		

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<p>3</p>	<p>Rules and responsibilities of COCERAL</p> <p>Through its secretariat, COCERAL is in charge of:</p> <ul style="list-style-type: none"> ➤ Maintaining a public register with an updated list of the approved certification bodies. The only valid register is available on the GTP Code website at: http://www.gtpcode.eu; ➤ Maintaining a public register with an updated list of the certified operators. The only valid register is available on the GTP Code website at: http://www.gtpcode.eu; ➤ Any periodic modifications to the certification rules made by COCERAL will be notified to the licensed Certification Bodies and included in the GTP homepage information. As an aid to users, each revision of these documents will be published with the areas of significant change highlighted. ➤ A reasonable transition period for the implementation of changes to the GTP Code and certification rules will be decided by COCERAL on a case-by-case basis. Such a reasonable transition period shall not exceed 12 months. The reference language versions of the GTP Code and certification rules are the English versions, published on the GTP Code website at: http://www.gtpcode.eu. ➤ Assessing and approving Certification Bodies according to section 4. ➤ Training, managing and coordinating Certification Bodies according to section 5. 	<p>SECTION 2</p>	<p>EFISC-GTP Aisbl RULES AND RESPONSIBILITIES</p> <p>Through its secretariat, EFISC-GTP Aisbl will be in charge of:</p> <ul style="list-style-type: none"> ■ Maintaining a public register with an updated list of the approved certification bodies. The only valid register is available on the EFISC-GTP Aisbl website: www.EFISC-GTP.eu ■ Maintaining a public register with an updated list of the certified operators, with indication of the scope of certification. The only valid register is available on the EFISC-GTP Aisbl website. ■ Updating periodically the EFISC-GTP Code and the Rules of Certification. All modifications will be notified to the licensed certification bodies and included in the EFISC-GTP Aisbl homepage information. As an aid to users, each revision of these documents will be published with the areas of significant change highlighted. A reasonable transition period for the implementation of changes to the EFISC-GTP Code and EFISC-GTP Rules of Certification will be decided by EFISC-GTP Aisbl on a case-by-case basis. The reference language versions of the EFISC-GTP Code and Certification Rules are the English versions, published on the EFISC-GTP Aisbl web site. ■ Assessment and approval of Certification Bodies (See §2.1). ■ Verification and registration of the auditors (See §2.2 & §3.1.2). ■ Training, managing and coordinating Certification Bodies (See §2.2). ■ Verification of audit reports and certificates (See §2.4). ■ Implementation of the surveillance program (See §2.5). ■ Dealing with complaints (See§2.6).
<p>4</p>	<p>Assessment and approval of Certification Bodies</p> <p>COCERAL is responsible for granting, maintaining, suspending and withdrawing the authorization of certification bodies to issue GTP certificates. COCERAL is also responsible for the training and coordination of certification bodies.</p> <p>No certification body is allowed to grant a GTP certificate without license from COCERAL. Only GTP certificates issued by contracted certification bodies will be valid.</p> <p>Certification of companies against GTP is open to any appropriately accredited certification body established on the basis that the body is a legal entity and will be confined to declared scopes, activities and locations.</p> <p>COCERAL will engage certification bodies by contractual agreement on payment of the fees of certification to COCERAL, on the supervision by COCERAL, on the right to monitor audit activities and on the right to have access to detailed reporting by the auditors and full acceptance of the certification rules as they are issued by COCERAL.</p>	<p>2.1</p>	<p>Assessment and approval of Certification Bodies</p> <p>EFISC-GTP Aisbl is responsible for granting, maintaining, suspending and withdrawing the allowance of certification bodies to issue EFISC-GTP certificates.</p> <p>No certification body is allowed to grant an EFISC-GTP certificate without licence from EFISC-GTP Aisbl. Only EFISC-GTP certificates issued by contracted certification bodies will be valid.</p> <p>Certification of companies against EFISC-GTP is open to any appropriately accredited certification body (see 3.1.1) established on the basis that the body is a legal entity and will be confined to declared scopes, activities and locations.</p> <p>Certification bodies wishing to obtain the licence to carry out EFISC-GTP certification shall apply to the EFISC-GTP Aisbl Board for the relevant scope, providing details for eligibility according to established selection criteria. The application form is available in Annex 3. The certification body applies, submitting required enclosures:</p> <ul style="list-style-type: none"> ■ Accreditation certificate ISO/IEC 17021-1:2015 (supplemented by ISO/TS 22003:2013) ■ Fields of work in feed/food (reference document with the experience in feed/food) ■ List of auditors, their qualification(s) and contact details (see §3.1.2) ■ Certification procedure for EFISC-GTP <p>Apart from this, the certification body has to commit to include EFISC-GTP in the coverage of its ISO/IEC 17021-1:2015 (supplemented by ISO/TS 22003:2013) accreditation within one year. This commitment shall be formalised by means of a letter addressed to the EFISC-GTP Aisbl Board. The certification body shall ensure that the accreditation body selected for the assessment will fulfil the requirements as described in chapter 4. The Board makes a (n) approval/non-approval decision within 4 months, further to recommendation by the Expert Panel. Decision is without appeal. All information obtained before, during or after assessment, including the fact that a particular certification body has applied for approval, or that an application has been</p>

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			<p>deferred or rejected, will be treated in strictest confidence by EFISC-GTP Aisbl. As an integral part of their contractual agreement with EFISC-GTP Aisbl, licensed certification bodies will pay an annual license fee to EFISC-GTP Aisbl. Fees between operators and certification bodies are at the discretion of both parties. See Annex 1 for more information. Upon approval, the applicant certification body shall agree to contractual provisions (co-ordination, reporting and fee obligations) and shall attend a full EFISC-GTP training session provided by EFISC-GTP Aisbl. Fully licensed status is achieved following endorsement of the contract by the certification body and EFISC-GTP Aisbl. Only licensed certification bodies are entitled to certify operators according to EFISC-GTP. Once approved, the name and details of the approved Certification Bodies are gathered by EFISC-GTP Aisbl in a public register, available via the EFISC-GTP Aisbl homepage. Approval of a Certification Body and inclusion in the register is subject to the respect of the contractual agreement between the Certification Body and EFISC-GTP Aisbl. Certification Bodies agree to publication of its name and contact details on the official list of approved Certification Bodies on the EFISC-GTP Aisbl web site. It is understood that the only official register of EFISC-GTP Certification Bodies and certified operators is the one managed by EFISC-GTP Aisbl. The certification body must notify EFISC-GTP Aisbl of any change to information given in the application or any change in circumstances relevant to requirements for certification bodies (set out below) within 8 weeks of the change having taken place. In case of non-respect of contractual agreement, EFISC-GTP Aisbl may decide to withdraw or suspend the approval from the Certification Body, following written notification.</p>
<p>4.1</p>	<p>Requirements for Certification Bodies</p> <p>The certification Body will demonstrably comply with the following requirements by providing documentation at application.</p> <p>Applicant certification bodies should be able to demonstrate:</p> <ul style="list-style-type: none"> ➤ Accreditation according to EN 45011 including coverage for GTP. Only applications from certification bodies which are accredited by a member of the IAF Multilateral Agreement (MLA) for a certification system with a relevant area of operations in feed and/or food industry will be taken into consideration. Within 1 year after the initial acceptance by GTP or within one year after GTP is recognised as an accredited standard, the Certification Body must be accredited according to EN 45011 having GTP included in the scope. This commitment shall be formalised by means of a letter addressed to COCERAL ➤ Commitment to training and co-ordination obligations established by GTP ➤ Commitment to selection of competent and suitably trained auditors, and the ongoing training of auditors. Materials for the training and examination of auditors shall be available through COCERAL ➤ Commitment to monitor the quality of reports compiled by each auditor and take suitable action when reports do not meet the scheme requirement. Where deemed appropriate, COCERAL is entitled to carry out parallel audits by appointing an independent person of its choice to monitor GTP audit. <p>The Certification Body must not, within a period of two years prior to the audit, have undertaken any consultancy and/or dedicated training activities with the operator's site to be audited, and should demonstrably confirm this independence.</p>	<p>3.1.1</p>	<p>Requirements for Certification Bodies</p> <p>The certification body must demonstrably comply with the following requirements by providing documentation at application (see annex 3). Applicant certification bodies should be able to demonstrate:</p> <ul style="list-style-type: none"> ■ Formal demonstration of their competence to carry out specific conformity assessments tasks by a third party accreditation to provide certification to the EFISC-GTP code. The third party is an accreditation body that is signatory to the Multilateral Recognition Arrangement (MLA) of the European Accreditation Body (EA), and the International Accreditation Forum (IAF). ■ Proven commitment to EA and/or IAF Mandatory Documents applicable for ISO/ IEC 17021-1:2015 and ISO/TS 22003:2013. ■ Proven experience in the feed/food industry (already conducting HACCP based audits in the feed/food business, for example EFISC-GTP recognised schemes or official inspection of feed/food business operators. ■ Within 1 year after the initial acceptance by EFISC-GTP Aisbl or within one year after EFISC-GTP is recognised as an accredited standard, the certification body must be accredited according to ISO/ IEC 17021-1:2015 (supplemented by ISO/TS 22003:2013) having EFISC-GTP included in the scope. ■ Commitment to training and co-ordination obligations established by EFISC-GTP Aisbl (See § 2.2). ■ Commitment to selection of competent and suitably trained auditors, and the ongoing training of auditors. Materials for the training of auditors shall be available through EFISC-GTP Aisbl. ■ Commitment to monitor the quality of reports compiled by each auditor and take suitable action when reports do not meet the scheme requirement. ■ The certification body may not, within a period of two years prior to the audit, have undertaken any consultancy and/or dedicated training activities with the operator's site to be audited, and should demonstrably confirm this independence.

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<p>4.2</p>	<p>Approval of Certification Bodies</p> <p>Organisations wishing to obtain approval to carry out GTP certification shall apply to COCERAL, providing details for eligibility.</p> <p>The application will be taken into consideration once:</p> <ol style="list-style-type: none"> a. The application form has been fully completed and is handed over to COCERAL together with a statement of intent to provide the requested enclosures; b. The application fee to COCERAL is paid. <p>The approval/non-approval decision is made by COCERAL within maximum 4 weeks once that all conditions are fulfilled. Decision is without appeal. All information obtained before, during or after assessment will be treated in strictest confidence by COCERAL.</p> <p>Upon approval, the applicant Certification Body must agree to contractual provisions (co-ordination, reporting and fee obligations) and must attend the training meetings provided by COCERAL. Full approval status is achieved following endorsement of the contract agreement between the Certification Body and COCERAL.</p> <p>The certification body must notify COCERAL of any change to information given in the application or any change in circumstances relevant to requirements for certification bodies within 4 weeks of the change having taken place.</p> <p>In case of non-respect of contractual agreement, COCERAL may decide to withdraw the approval from the Certification Body, following written notification.</p> <p>In that case, the concerned certified operators shall ensure that a new contract is signed with another Certification Body licensed by COCERAL. GTP certificates delivered by the withdrawn Certification Body will remain valid on the condition that the concerned certified companies comply with all GTP requirements. On a case by case basis, the need for re-certification of certified companies will be assessed by the GTP Harmonisation Committee.</p>	<p>3.1.2</p>	<p>Requirements for the certification body quality management system</p> <p>The certification body shall operate an effective and documented quality management system, containing all necessary procedures for compliance, available and used by all relevant staff of the certification body. As a minimum it shall contain:</p> <ul style="list-style-type: none"> ■ The legal status of the certification. ■ The quality policy statement. ■ The organisational structure and a description of the related jobs and responsibilities. ■ A list of the relevant personnel, their qualifications, training received and job description. ■ The description of the audit, evaluation and certification process. ■ The management review and policy procedures. ■ Procedures in relation to documentation control. ■ A list of all subcontractors and the procedure for their assessment and management. ■ Procedures for actions related to non-conformities and the evaluation of the corrective actions. ■ Procedures for conducting internal audits, their evaluation and corrective actions following.
<p>5</p>	<p>Training, management and coordination of Certification Bodies</p> <p>COCERAL will assure the co-ordination and general training of the recognised certification bodies through at least annual meetings. The training of auditors remains the responsibility of certification bodies. COCERAL may however decide, on a case by case basis, to carry out training sessions for auditors, where deemed appropriate. Each certification body is required to ensure that every auditor undergoes at least 2 days of ongoing relevant technical training/development per year in order to sustain professional development and knowledge of developments in quality assurance and legal obligations relating to the GTP code.</p> <p>As an integral part of their contractual agreement with COCERAL, the Certification Bodies shall:</p> <ul style="list-style-type: none"> ➤ Participate in the annual meeting at COCERAL ➤ Report to COCERAL regarding implemented auditor training programs 10 working Days before the above mentioned annual meeting ➤ Provide (under confidentiality) a copy of each audit summary report in English ➤ Provide bi-annual statistical report of audits carried out, auditors performing the audit and certifications granted ➤ Report immediately to COCERAL any non-conformity identified in periodical auditing that leads to withdrawal of certification <p>Report to COCERAL about interpretation and implementation issues identified in carrying out the</p>	<p>3.1.3.2</p>	<p>Annual training, audit experience and evaluation</p> <ul style="list-style-type: none"> ■ In order to maintain the approval the auditor shall be regularly trained by the certification body on the EFISC-GTP feed/food safety assurance scheme. A special focus will be given to the different sector documents and their risk assessments. (At least 2 days ongoing relevant technical training/development per year). The training program shall sustain professional development and knowledge of developments in quality assurance and legal obligations relating to the feed/food ingredient sector. The auditor shall keep up to date with GMP, GHP, GTP, HACCP, PRP, feed/food safety and technological developments and have access to and be able to apply relevant laws and regulations, related ISO documents and the Codex Alimentarius. ■ The annual training of each auditor will incorporate a periodic examination, prepared by the certification body in cooperation with EFISC-GTP, of his knowledge and skills and the ability to apply these. Each product category will be included in the examination. The exam will be followed by a sign off of the satisfactory completion of the training programme by the appointed competent supervisor. The outcome will be documented. If an auditor does not pass the examination (score below 59 %), he or she is obliged to a re- examination within six months. If an auditor passes the exam with a score between 60-79% the approval is valid for a two year period. If an auditor passes the exam with a score between 80- 100% the approval is valid for a 3 year period.

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	certification.		<ul style="list-style-type: none"> ■ In order to maintain the audit experience the auditor shall perform at least 5 external audits at different organisations of the EFISC-GTP scheme or EFISC-GTP recognised feed schemes annually.
6	<p>Selection and mission of auditors</p> <p>Requirements for auditors</p> <p>Certification Bodies shall ensure that all auditors, including contractors:</p> <ul style="list-style-type: none"> ➤ Are approved before they are allowed to carry out GTP audits without supervision. In order to gain approval, auditors must meet all of the requirements shown below. The Certification Body shall provide evidence to COCERAL that the requirements of the appointed auditors are met. Name, details and qualifications of the auditors are provided to COCERAL as part of the contractual agreement with the Certification Body. An overview of the auditors performing GTP audit activities and the scope will be included in the CB's bi- annual report ➤ Qualify according to EN 45011 and ISO 19011:2002 ➤ Have a higher education in Agriculture or Food Technology ➤ Are experienced in the feed and/or food sector (at least 3 years) ➤ Have audit individual experience or by witness audits (with a minimum of 10 complete and satisfactory food and/or feed industry audits over the last two years) against relevant schemes as listed in reference 2 of the GTP Code. ➤ Have successfully completed Lead Assessor training and recognised training in HACCP; ➤ Understand the GTP Code and have knowledge of the feed and/or food sector related risks ➤ Are specifically and regularly trained by the Certification Body or exceptionally by COCERAL, where deemed appropriate, on the GTP code (at least 2 days ongoing relevant technical training/development per year in order to sustain professional development and knowledge of developments in quality assurance and legal obligations relating to the sector) ➤ Have not, within a period of two years prior to the audit, undertaken any consultancy and/or training activities with the operator's site to be audited. They shall demonstrably confirm this independence ➤ Undersign non-disclosure forms regarding all information obtained, willing or unwilling during audits or related to audits ➤ The Certification Body must undertake that any auditor will not audit the same operator for more than 4 consecutive years. An auditor should have a break of at least 2 years before being allowed to start another cycle of 4 consecutive audits. 	3.1.3.1	<p>Initial approval of the auditor</p> <p>Certification bodies shall ensure that all auditors, including contractors:</p> <ul style="list-style-type: none"> ■ Are approved by the certification body before they are allowed to carry out EFISC-GTP audits without supervision. In order to gain approval, auditors will follow an initial training program, covering the requirements below, followed by an examination, prepared by the certification body in cooperation with EFISC-GTP, and a documented sign off by the supervisor. ■ The certification body shall provide the name, details and qualifications of the auditors and evidence that the requirements are met. ■ The auditor will be registered in the EFISC-GTP auditor database. ■ The auditor shall: <ul style="list-style-type: none"> ■ Qualify according to ISO/ IEC 17021-1:2015 and ISO/TS 22003:2013 ■ Are experienced in the feed/food sector (at least 5 years of full time work experience in the areas of processing, technology, raw materials and/or products of which 2 years in quality assurance with feed/food safety management systems or equivalent). ■ Post- secondary, field related education including food microbiology, feed/food processing fundamentals and chemistry including food analysis. ■ Be able to apply relevant feed/food legislation. ■ Demonstrate competence and understanding in the implementation of management systems, HACCP and PRP programmes. ■ New auditors shall for a first qualification be assessed on their performance in a combination of minimum 10 audit days or 5 on site audits at different organisations (complete and satisfactory feed/food industry audits in the last year) against EFISC-GTP or relevant feed/food scheme's recognised by EFISC-GTP (see Annex 3 EFISC-GTP Code) under the leadership of a qualified auditor. ● Have successfully completed training on: <ul style="list-style-type: none"> ■ Lead Assessor training based on ISO 19011:2011 and ISO/IEC 17021-1:2015 supplemented by ISO/TS 22003:2013 (minimum 5 day training) ■ Food safety management principles (e.g. ISO 22000:2005, prerequisite programmes (ISO/TS 22003:2013-2&6) ■ By the industry recognized HACCP training (minimum 2 day training) ■ European and National legislation applicable to feed/food safety ■ EFISC-GTP Code ■ EFISC-GTP Rules of Certification ■ The EFISC-GTP sector reference documents and have knowledge of the specific feed/food sector related risks (hazards, hazard assessment, hazard analysis, operational pre-requisite program

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			(OPRP's), critical control points (CCP's), monitoring and risk management).																		
7	<p>Audit preparation</p> <p>All GTP related documents in force (last version of the code, audit check-list, pre-audit documentation, etc.) are available on the GTP Code website.</p>	7.1.7	Evaluation of compliance with EFISC GTP																		
8	<p>Evaluation of compliance with GTP</p> <p>In evaluating operators for compliance with GTP, auditors should use an audit plan which includes:</p> <ul style="list-style-type: none"> ➤ Review of the implementation of corrective actions for previous non-conformities and their effectiveness ➤ Review of any organisational changes ➤ Evaluation of process descriptions/documentated procedures for conformity with the requirements of the GTP Code. <p>Any non-conformity established is to be discussed with senior management and/or the management representative present during the audit. The same applies to the agreement on the corrective action(s).</p> <p>Documents and other positive evidence consulted for audit purposes, including interviews, should be identified in the audit record. Clearly identified document samples and any additional remarks are recorded to serve as a basis for evaluation of the operator by the auditor following the interviews. Only one audit record is needed when the audit is performed jointly by two or more auditors in a team. Where auditors operate separately during an audit, each auditor shall keep their own audit record. Evaluation is undertaken on completion of separate stages or, where non-conformities are established, immediately after the assessment of the management element concerned by both auditors jointly. At the end of the assessment, the lead auditor receives the sections of the audit record completed by the co-auditor/s. There is ultimately only one audit record for each assessment.</p> <p>The information obtained during the audit and recorded in the audit report will remain strictly confidential and will be made available only to representatives of the certification body, the operator and COCERAL. Any information used for statistical evaluation shall be formulated without any relation to the operator involved.</p> <p>Non-conformities</p> <p>Prior to completion of the audit record and in preparation to the feedback to the operator, the observations of the auditor are to be evaluated. In the course of this evaluation, non-conformities encountered are to be classified as follows:</p> <table border="1" data-bbox="197 1332 878 1481"> <thead> <tr> <th>Classification</th> <th>Cause</th> </tr> </thead> <tbody> <tr> <td>Critical</td> <td>A regulatory violation, food or feed safety failure resulting in unsafe food or feed, total loss of traceability such that recall of unsafe goods would be impossible,</td> </tr> </tbody> </table>	Classification	Cause	Critical	A regulatory violation, food or feed safety failure resulting in unsafe food or feed, total loss of traceability such that recall of unsafe goods would be impossible,	7.1.8	<p>Nonconformities</p> <p>Prior to completion of the audit record and in preparation to the feedback to the operator, the observations of the auditor are to be evaluated. 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	and/or complete unwillingness to cooperate in the audit.
Major	A complete failure to implement a requirement of GTP or a failure that may result in unsafe food or feed. A minor non-conformity of a previous audit that has been not addressed.
Minor	A partial failure to implement a requirement of GTP or poor evidence to demonstrate implementation.

Non-conformities, their direct consequences and correction

Non-conformity	Initial audit	Surveillance or Re-certification audit
Critical	Certification cannot be granted until the non-conformities have been closed out.	<p>The auditor shall request (in writing): to the operator:</p> <p>Interruption of trading activities covered by the GTP certificate scope.</p> <ul style="list-style-type: none"> ● Blocking and/or recall of involved products. ● The operator to report the incident to the relevant authorities, as required by EU Regulation 178/2002. <p>to the Certification Body:</p> <ul style="list-style-type: none"> ● Immediate suspension of the operators certificate ● Inform COCERAL of the suspension of the certificate <p>In case the non-conformities are not resolved within the maximum suspension period</p>

Minor	Closed by the acceptance of the action plan by the auditor.
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A readable copy of any non-conformity form shall be discussed with the operator and handed over to him.

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		of 72 calendar days, certification will be withdrawn.		
Major	Certification cannot be granted until the non-conformities have been closed out.	Certification continues. The action plan shall be presented to the certification body the latest 14 calendar days after the audit date. Evidence that non-conformities have been closed out will be checked 28 calendar days after the presentation of the action plan the latest. In case non-conformity is not resolved and closed-out by then, it becomes a critical non-conformity.		
Minor	Certification cannot be granted until the non-conformities have been closed out. An agreement on the action plan shall be taken between the certification body and the operator; deadline for this agreement is 28 calendar days after the initial audit. Evidence that non-conformities have been closed out must be provided to the certification body within 56 calendar days of the initial audit.	Certification continues. An agreement on the action plan shall be taken between the certification body and the operator; deadline for this agreement is 28 calendar days after the surveillance or re-certification audit. Evidence that non-conformities have been closed out must be provided to the certification body within 56 calendar days. In case non-conformity is not resolved and closed-out by then, it becomes a major non-conformity.		
<p>Recommendations</p> <p>In addition to non-conformities, recommendations may be made by an auditor based on observations, with a view to fostering the continuous improvement of the operator's food and/or feed safety management system.</p>				

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	<p>For making recommendations, the following points should be considered:</p> <ul style="list-style-type: none"> ➤ The general presentation of the assessed area or operator ➤ Implemented HACCP principles for ongoing improvement of food and/or feed safety ➤ The motivation of the management and employees ➤ Elimination of former nonconformities ➤ Understanding of the system within the different corporate levels ➤ Behavior of operators (open-mindedness, honesty, etc.). 		
9	<p>Final discussion and conclusion</p> <p>The result of assessment may be the conclusion that the management system:</p> <ol style="list-style-type: none"> a. fulfils the requirements of GTP; or b. has one or more nonconformities. <p>The management representative is entitled to comment on the results of the audit. The goal is to reach agreement about the weaknesses and strengths of the implemented quality management system and if there are any non-conformities, their scale and the corrective actions to be taken. The aim should be to document corrective actions directly following the audit.</p> <p>Non-conformities and corrective actions to be taken are documented in the action plan, and must be signed by the lead auditor and the management representative. The management representative receives the original copy of the action plan and makes a copy for the auditor. This also serves as the basis for determining the work involved in the next assessment. Where deemed necessary, checks to verify the implementation of corrective actions for previous non-conformities within the permitted timescale can be carried out prior to the follow-up audit. The result shall be agreed with senior management during the final discussion and the details of the agreement reached shall be recorded in the report.</p> <p>The lead auditor prepares the presentation for the final discussion in line with the observations and agreements reached. The following points should be considered:</p> <ul style="list-style-type: none"> ➤ Complete record of operators present ➤ Presentation of the assessment results. Indication that the Certification Board of the certification Body takes the final decision on the award of the certificate ➤ Explanation of weaknesses and strengths ➤ Explanation of further steps (follow-up assessment, if applicable) ➤ Fixing a date for next assessment ➤ Closing remarks by the co-auditor, if desired ➤ Closing remarks by the management representative ➤ Exchange of views, if desired 	7.1.9	<p>Final discussion and conclusion</p> <p>The result of assessment may be the conclusion that the management system:</p> <ol style="list-style-type: none"> a) Fulfils the requirements of EFISC-GTP; or b) Has one or more nonconformities. <p>The auditor will present the list of non-conformities, if any. The management representative is entitled to comment on the results of the audit. The goal is to reach agreement about the weaknesses and strengths of the implemented safety management system and if there are any nonconformities, their scale and the corrective actions to be taken.</p> <p>The list of nonconformities must be signed by the lead auditor and the management representative. The management representative receives the original copy of the list and makes a copy for the auditor. This also serves as the basis for determining the work involved in the next assessment. The result shall be agreed with senior management during the final discussion and the details of the agreement reached shall be recorded in the report. The lead auditor prepares the presentation for the final discussion in line with the observations and agreements reached. The following points should be considered:</p> <ul style="list-style-type: none"> ■ Complete record of participants present. ■ Presentation of the assessment results. Indication that the certification bodies Certification Board takes the final decision on the award of the certificate. ■ Explanation of weaknesses and strengths. ■ Explanation of further steps (follow-up assessment, if applicable). ■ Fixing a date for next assessment. ■ Closing remarks by the co-auditor, if desired. ■ Closing remarks by the management representative. ■ Exchange of views, if desired. <p>The lead auditor should use the audit report form to indicate those elements of EFISC-GTP which were applicable and audited. In the case of non-conformities the management shall prepare an action plan, analyse the cause and describe the specific correction and corrective actions to be taken to eliminate detected non conformities, within a defined time (See table 6.1.6) and communicate the action plan to the certification body. The certification body shall review the action plan to see if this is acceptable. The certification body will verify the effectiveness of any correction and corrective actions taken. The evidence obtained to support the resolution of non-conformities shall be recorded.</p>
10	<p>Requirements in terms of assessment – Duration and frequency of audits</p> <p>Audit durations are established according to the time grid below in Annex 3 of these</p>	7.1.3	<p>Determination of audit time</p> <p>Audit duration is dependent on the number of parallel processes to be audited at the same location within</p>

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<p>certification rules.</p> <p>Sampling rules about the number of silos to be visited in the framework of audits are presented in Annex 1 of these certification rules.</p> <p>The audits must be performed following the traditional diagram representing a first assessment and then two surveillances, one every 12 months. Should the audit conclusions underline the need for a complementary audit, it could be decided by the Certification Board of the Certification Body.</p> <p>The Certification Body undertakes that it would only use the audit check-list published by COCERAL as such, without revising or amending it. The translation of the check-list is only allowed into the national language, provided that COCERAL gives its technical validation.</p> <p>COCERAL reserves the right to mandate an independent person of its choice to monitor the GTP audit.</p>	<p>the scope of the FSMS to be certified. One audit day is 8 hours. Auditor time stated does not include reporting. Reporting time is to be agreed between the operator and the CB. Typically reporting time is 0.5 day per site but can vary depending of the size, complexity and audit combinations. Initial certification, re-certification, surveillance audits and unannounced audits may be combined with audits of other management systems. The defined audit time will ensure the effectiveness and depth of the assessment of the FSMS, GMP, GHP, HACCP and PRP in compliance with the requirements in the EFISC-GTP Code and the relevant sector document. Depending of the complexity of the products and or processes and the number of FTE (full time equivalents)/ employees involved in feed/food ingredient related activities as well as the possible previous audit results the certification body defines the audit time together with the operator. When an organisation deploys workers in shifts and the products and/or processes are similar, the FTE number will be calculated based on employees on the main shift (including seasonal workers) plus feed/food safety related office workers. When properly documented and justified, a reduction can be made for a less complex organisation measured by number of employees, size of the organisation and/or product volume or within categories having a basic audit time of less than 1.5 day audit time. A HACCP study corresponds to a hazard analysis for a family of products /services with similar hazards and similar production technology and, where relevant, similar storage technology. If the scope of one specific operator covers more than one category, the audit time calculation shall be taken from the highest recommended basic audit time. Additional time is required for each HACCP study.</p> <p>Initial audit:</p> <p>An initial audit takes place at the location of an applicant seeking certification against the EFISC-GTP Code. It should be carried out by checking the whole sections of the EFISC-GTP Code.</p> <p>See table §7.1.4 Minimum initial audit and re-certification audit time for the relevant scope and time calculation</p> <p>Surveillance audit:</p> <p>A surveillance audit is a periodical audit performed to ensure that an organization still meets EFISC-GTP requirements. Depending on the previous audit results as well as the complexity of the products and or processes the CB defines the audit time together with the operator. The auditor ensures to address all EFISC-GTP requirements during the total of the two surveillance audits.</p> <p>Typical audit time for surveillance visits is set on 75 % of the initial audit time with a minimum of 1 audit day</p> <p>See table §7.1.4 Minimum initial audit and re-certification audit time for the relevant scope and time calculation</p> <p>Re- certification audit:</p> <p>A re- certification audit takes place at the end of a certification period. The audit must be planned in due time in order to avoid expiration of the certificate. It should be carried out by checking all sections of the EFISC-GTP Code. Audit time for renewal of the certificate is identical to an initial audit.</p> <p>See table §7.1.4 Minimum initial audit and re-certification audit time for the relevant scope and time calculation</p> <p>Special audits:</p> <p>It may be necessary that an audit is conducted by the certification body at short notice, in the following cases:</p> <ol style="list-style-type: none"> 1. If the operator is involved in an feed/food safety incident 2. Follow up of the audit which is listed on the EFISC-GTP website under review <p>It is the responsibility of the Certifying Body to increase the audit time if the complexity of processes or the auditee's organisation calls for this.</p> <p>Unannounced audits</p> <p>Typical audit duration for an unannounced audit is 4 hours, including reporting. The operator can indicate up to 15 days in the year that the audit cannot take place. The days should be used when the site is not in production. The unannounced audit will take place during week days.</p>
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<p>11</p>	<p>Requirements in terms of audit report</p> <p>A draft of the audit report should be discussed with the operator and the final audit report sent to the operator within 4 weeks of the audit. To enable COCERAL to monitor audits and to ensure consistency, audit results shall be supplied to COCERAL in a standard format, to include the number of non-conformities per section (critical, major, etc.) and a summary of observations and conclusions. The report of findings provided to COCERAL shall be of sufficient detail to enable an understanding of the basis for the certification decision and should include the areas covered by the assessment, the positive and negative observations made and a summary of non-conformities. COCERAL reserves the right to assess the audit reports on a random sample check. In case any uncertainty regarding the quality of audit and corresponding certification exists, COCERAL is entitled to initiate independent parallel audits.</p> <p>A format of audit report is enclosed to this document (see <i>Annex 2</i>). Certification Bodies shall use the standard format provided by COCERAL.</p> <p>Audit reports provided to operators in the local language (not English) shall include a statement advising the operator that a summary report in English will be sent to COCERAL and to the operator, and that the report will be treated in strictest confidence. The contract between the certification body and the operator should include a clause specifying that this summary report is sent confidentially to COCERAL. This is the responsibility of the certification body. The responsibility for determining whether an operator is to be certified or not, remains entirely with the Certification Body.</p> <p>The information obtained during the audit and recorded in the audit report will remain strictly confidential and will be made available only to representatives of the Certification Body and COCERAL. Any information used for statistical evaluation shall be formulated without any relation to the operator involved.</p> <p>In case of any unresolved disagreement between an operator and a recognised Certification Body, circumstances should be reported in writing by the operator to COCERAL for consideration by the Certification Board.</p> <p>The Certification Body must commit to keep the audit check-list filled in by the auditor (in particular for the non-conformity items) in the file of the audited operator during the certificate validity period.</p>	<p>7.1.11</p>	<p>Audit report</p> <p>The final audit report will be sent to the operator within 6 weeks after the audit. To enable EFISC-GTP Aisbl to monitor audits and to ensure consistency, audit results must be supplied to EFISC-GTP Aisbl in a standard format in line with the reporting form (Annex4), to include the number of nonconformities per section (critical, major, etc.) of the previous and actual audit and a summary of observations and conclusions, including any unresolved issues, if identified,. The report of findings provided to EFISC-GTP Aisbl shall be of sufficient detail to enable an understanding of the basis for the certification decision and should include the areas covered by the assessment, the positive and negative observations made and a summary of nonconformities. In case any uncertainty exists regarding the quality of audit and corresponding certification, EFISC-GTP Aisbl is entitled to initiate independent parallel audits. A format of audit report is enclosed to this document (see Annex 4). Audit reports provided to operators must include a statement advising the operator that a summary report in English will be sent to EFISC-GTP Aisbl, and that the report will be treated in strictest confidence. The contract between the certification body and the operator should include a clause specifying that this summary report is sent confidentially to EFISC-GTP Aisbl. This is the responsibility of the certification body. The responsibility for determining whether an operator is to be certified or not remains entirely to the certification body. The information obtained during the audit and recorded in the audit report will remain strictly confidential and will be made available only to representatives of the certification body, the operator and EFISC-GTP Aisbl. Any information used for statistical evaluation shall be formulated without any relation to the operator involved. In case of any dispute between an operator and an approved certification body, circumstances should be reported in writing by the operator to EFISC-GTP Aisbl for consideration, parallel to addressing the standard procedures of the certification body regarding complaints and/or appeals.</p>
<p>12</p>	<p>Decision requirements</p> <p>12.1 Certification Board</p> <p>The decision as regard the certification is taken by a Certification Board, based on the audit report, the recommendation of audit team, on procedures inherent to the certification body, and on all relevant information (public information, comments, by participants, on the report, etc.). If it concerns a renewal of the certification, the certification body must base its decision on:</p> <ul style="list-style-type: none"> - Conclusions of the renewal audit; - Results of the review relating to the corresponding system of the cycle certification; and - Complaints received from the certification users. <p>During the deliberation, a person having technical knowledge relating to the applied system, must be present. The certification body must determine, the minimum technical knowledge required and demonstrate compliance to it.</p> <p>The decisions regarding certification and renewal, must be taken by persons, other than those who conducted the audits.</p>	<p>SECTION 2</p>	<p>EFISC-GTP Aisbl RULES AND RESPONSIBILITY</p> <p>Through its secretariat, EFISC-GTP Aisbl will be in charge of:</p> <ul style="list-style-type: none"> ■ Maintaining a public register with an updated list of the approved certification bodies. The only valid register is available on the EFISC-GTP Aisbl website: www.EFISC-GTP.eu ■ Maintaining a public register with an updated list of the certified operators, with indication of the scope of certification. The only valid register is available on the EFISC-GTP Aisbl website. ■ Updating periodically the EFISC-GTP Code and the Rules of Certification. All modifications will be notified to the licensed certification bodies and included in the EFISC-GTP Aisbl homepage information. As an aid to users, each revision of these documents will be published with the areas of significant change highlighted. A reasonable transition period for the implementation of changes to the EFISC-GTP Code and EFISC-GTP Rules of Certification will be decided by EFISC-GTP Aisbl on a case-by-case basis. The reference language versions of the EFISC-GTP Code and Certification Rules are the English versions,

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			<p>published on the EFISC-GTP Aisbl web site.</p> <ul style="list-style-type: none"> ■ Assessment and approval of Certification Bodies (See §2.1). ■ Verification and registration of the auditors (See §2.2 & §3.1.2). ■ Training, managing and coordinating Certification Bodies (See §2.2). ■ Verification of audit reports and certificates (See §2.4). ■ Implementation of the surveillance program (See §2.5). ■ Dealing with complaints (See§2.6).
12.2	<p>Certificate</p> <p>The certificate is valid for 3 years and surveillance audits have to be performed every year in-between. If the surveillance audit is not received on time, the operator will be withdrawn from the public list.</p> <p>The Certification Body must forward to the COCERAL Secretariat the information needed for the publication or the update of the certification on public lists within 1 month following the granting of the certificate. This information must hold:</p> <ul style="list-style-type: none"> ➤ Name of the audited operator ➤ Opinion and date of decision of the Certification Board ➤ Copy of the certificate under pdf format or notification of the successful surveillance audit ➤ Legal representative ➤ Contact point ➤ Crisis commissioner ➤ Phone and fax number, if available ➤ Email address <p>In case of suspension or withdrawal of the certificate, the Certification Body will immediately inform COCERAL Secretariat so that necessary measures can be taken.</p>	SECTION 9	<p>Certificate</p> <p>Certification shall only take place where sufficient evidence to demonstrate compliance with EFISC-GTP exists. A certificate is valid for a period of 3 years.</p> <p>A certification body may issue certificates on the basis of an assessment carried out by another body provided that the agreement with the subcontracted body or personnel requires it to comply with all the relevant requirements.</p> <p>The decision on certification, continuation of certification and/or application of sanctions is taken by the CB's Certification Board, based on the findings and recommendation of the auditor. The certification body shall ensure that the Certification Board that make the certification or recertification decisions are different from those who carried out the audits. The Certification Board consist of technical reviewer and the certification manager. The technical reviewer is a designated, competent officer within the certification body different from the one(s) who carried out the evaluation. This officer shall comply with the requirements as auditor. The certificate has to be issued according to the template provided in annex 6.</p> <p>The names and addresses of certified companies and the valid certificate are gathered by EFISC-GTP Aisbl in a public register, available via the EFISC-GTP Aisbl homepage.</p>
13	Requirements in terms of Certificate	Section 9	Certificate
13.1	<p>Certificates</p> <p>The certificates must contain the following information, in English, and if required by customers, in the national language of the Member State of the audited operator:</p> <ul style="list-style-type: none"> ➤ Heading ➤ Indication of the certified scope (including all product groups and services provided to customers and encompassed in the certificate) ➤ Indication of the version of the GTP code which has been used for the audit of the operator ➤ Date of certification ➤ Date of expiry of the Certificate ➤ Name and address of the audited operator 	SECTION 9	<p>Certificate</p> <p>Certification shall only take place where sufficient evidence to demonstrate compliance with EFISC-GTP exists. A certificate is valid for a period of 3 years.</p> <p>A certification body may issue certificates on the basis of an assessment carried out by another body provided that the agreement with the subcontracted body or personnel requires it to comply with all the relevant requirements.</p> <p>The decision on certification, continuation of certification and/or application of sanctions is taken by the CB's Certification Board, based on the findings and recommendation of the auditor. The certification body shall ensure that the Certification Board that make the certification or recertification decisions are different from those who carried out the audits. The Certification Board consist of technical reviewer and the certification manager. The technical reviewer is a designated, competent officer within the certification body different from the one(s) who carried out the evaluation. This officer shall comply with the requirements as auditor. The certificate has to be issued according to the template provided in annex 6.</p>

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	<ul style="list-style-type: none"> ➤ If the audited operator has various sites, on the back of the page, the name and address of each certified site and its scope of certification ➤ The name, address and the logo of the Certification Body ➤ The GTP Code version logo <p>The reference language versions of the GTP Code and Certification Rules are the English versions, published on the GTP Code website.</p>		The names and addresses of certified companies and the valid certificate are gathered by EFISC-GTP Aisbl in a public register, available via the EFISC-GTP Aisbl homepage.
13.2	<p>Withdrawal of Certificates</p> <p>The withdrawal of the certificates remains the responsibility of the certification body. Any certified operator who is in breach of any provisions of the GTP Code may have their certification against the GTP scheme withdrawn with immediate effect by written notice by a recognised Certification Body (more details below in section 15.2). This notice will inform the certified operator of the reason for withdrawal and will also provide details of the Appeal Procedure (see section 15.3). Once withdrawal is confirmed, the name of the operator will be removed from the GTP register on the website (www.gtpcode.eu) upon information to COCERAL.</p>	9.1	<p>Withdrawal of Certificates</p> <p>The withdrawal of the certificate remains the responsibility of the certification body. Once withdrawal is confirmed, the name of the company will be removed from the EFISC-GTP Aisbl register on the website (www.EFISC-GTP.eu).</p>
13.3	<p>Expiring Certificates</p> <p>When the validity date of the certificates has expired, the name of the operator will still remain on the GTP register on the website (www.gtpcode.eu) for a further period of one month but marked as such. If, after this period, a renewed certificate has not been submitted to COCERAL, the name of the operator will be removed from the GTP register on the website.</p>	9.2	<p>Expiring Certificates</p> <p>When the validity date of the certificate has expired, the name of the company will still remain on the EFISC-GTP register on the website (www.EFISC-GTP.eu) for a further period of one month. If, after this period, a renewed certificate has not been submitted to EFISC-GTP Aisbl, the name of the company will be removed from the EFISC-GTP register on the website.</p>
13.4	<p>Exclusion of certificates</p> <p>It is the obligation of the GTP certified operator not to mislead stakeholders and authorities regarding the scope of their certification.</p>	9.3	<p>Exclusion of certificates</p> <p>It is the obligation of the EFISC-GTP certified operator not to mislead stakeholders and authorities regarding the scope of their certification.</p>
13.5	<p>Use of GTP Logo</p> <p>GTP name and logo may only be used by operators that have obtained certification from a Certification Body approved by COCERAL. The right to use the GTP logo and/or name is exclusively granted by COCERAL and can be withdrawn at any moment in the event of non-compliance with certification requirements.</p> <p>Certified operators may display the GTP logo for the period of validity of their certificate. Use or display of the GTP logo does not constitute proof that the operator is certified.</p> <p>The GTP logo is available upon request made to COCERAL and/or to the relevant Certification Body. It may be used only in its original colours and proportions.</p> <p>The GTP name and logo shall not be used on products, packaging, labels, means of transport, but may be used on certificates, advertisements and brochures.</p> <p>Press releases with GTP name and/or logo need to be approved by COCERAL before publication.</p>	9.4	<p>Use of EFISC-GTP Logo</p> <p>EFISC-GTP certified operators might display the EFISC-GTP logo on the finished product specification for the period of validity of their certificate. EFISC-GTP name and logo may only be used by operators that have obtained certification from a certification body approved by EFISC-GTP Aisbl. The right to use the EFISC-GTP logo and/or name is exclusively granted by EFISC-GTP Aisbl, and can be withdrawn at any moment in the event of non-compliance with certification requirements. The use or display of the EFISC-GTP logo does not constitute proof that the operator is certified. For the validity of the certificate check the certification database on the EFISC-GTP website. The EFISC-GTP name and logo shall not be used for promotion activities on products, packaging, labels, means of transport, but can be used for advertisements and brochures. Press releases with “EFISC-GTP name and/or logo need to be approved by EFISC-GTP Aisbl before publication. The EFISC-GTP logo is available upon request made to EFISC-GTP Aisbl. It may be used only in its original colours and proportions.</p>
14	<p>Publication of the certification decision</p>	7.1.11	<p>Audit report</p>

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	<p>The first certificate and confirmations of surveillance audits must be sent to COCERAL latest six weeks from the date of audit. COCERAL must grant a personal identification number and a GTP logo to the audited operator so that it could use them for future correspondence with the audited operator.</p> <p>COCERAL must register the name of the audited operator and the expiry date of the certificate under the link “certified companies” of the menu “Code of Good Trading Practice” on the public list available on the GTP register on the website (www.gtpcode.eu)</p> <p>COCERAL is allowed to forward the information regarding the GTP certification to any official body representing national or European public authorities or to any professional or inter professional organisation, in order to reference the audited companies on appropriate public lists.</p> <p>As soon as they are informed by the Certification Body, COCERAL delete the registration of an audited operator on the public list in case of suspension or withdrawal of the certificate.</p>		<p>The final audit report will be sent to the operator within 6 weeks after the audit. To enable EFISC-GTP Aisbl to monitor audits and to ensure consistency, audit results must be supplied to EFISC-GTP Aisbl in a standard format in line with the reporting form (Annex4), to include the number of nonconformities per section (critical, major, etc.) of the previous and actual audit and a summary of observations and conclusions, including any unresolved issues, if identified,. The report of findings provided to EFISC-GTP Aisbl shall be of sufficient detail to enable an understanding of the basis for the certification decision and should include the areas covered by the assessment, the positive and negative observations made and a summary of nonconformities. In case any uncertainty exists regarding the quality of audit and corresponding certification, EFISC-GTP Aisbl is entitled to initiate independent parallel audits. A format of audit report is enclosed to this document (see Annex 4). Audit reports provided to operators must include a statement advising the operator that a summary report in English will be sent to EFISC-GTP Aisbl, and that the report will be treated in strictest confidence. The contract between the certification body and the operator should include a clause specifying that this summary report is sent confidentially to EFISC-GTP Aisbl. This is the responsibility of the certification body. The responsibility for determining whether an operator is to be certified or not remains entirely to the certification body. The information obtained during the audit and recorded in the audit report will remain strictly confidential and will be made available only to representatives of the certification body, the operator and EFISC-GTP Aisbl. Any information used for statistical evaluation shall be formulated without any relation to the operator involved. In case of any dispute between an operator and an approved certification body, circumstances should be reported in writing by the operator to EFISC-GTP Aisbl for consideration, parallel to addressing the standard procedures of the certification body regarding complaints and/or appeals.</p>														
15	Rules of Sanction Procedure																
15.1	<p>General</p> <p>Where an operator violates the scheme agreement and the requirements of the GTP code, they can be penalised with sanctions, such as suspension from the scheme, within the scope of a sanction procedure. COCERAL and the Certification Body are responsible establishing the level of sanctions imposed and these are viewed on a case by case basis. The Certification Body must keep informed COCERAL of all potential suspensions as soon as they become aware of them.</p>																
15.2	<p>Certificate Suspension and withdrawn</p> <p>The Certification body, in conjunction with COCERAL, may suspend or withdraw an operator’s certificate of conformity when the operator falls into the following situations:</p> <ul style="list-style-type: none"> ➤ Non-conformities that are not resolved within the required time limits. ➤ Serious non-compliances that have, or are likely to have, an adverse effect on product safety or legality. ➤ Suspended operators must demonstrate to the Certification Body that the non-conformities have been resolved in order to have certification re-instated. A follow up assessment by the scheme verifier to confirm this shall take place. ➤ Operators that do not demonstrate to the Certification Body that non-conformities have been resolved within 1 month of suspension will have their certificates of conformity withdrawn. ➤ Operators that have their certification withdrawn would need to apply as new operators if they wish to regain certification. ➤ The Certification Body will inform COCERAL who will then automatically update the register on the GTP website with details of an operator’s changed certification status. 	<p>9.1</p> <p>7.1.10</p>	<p>Withdrawal of Certificates</p> <p>The withdrawal of the certificate remains the responsibility of the certification body. Once withdrawal is confirmed, the name of the company will be removed from the EFISC-GTP Aisbl register on the website (www.EFISC-GTP.eu).</p> <p>The consequences of nonconformities are outlined below:</p> <table border="1" data-bbox="1223 1182 2181 1469"> <thead> <tr> <th rowspan="2">Non-conformity</th> <th colspan="2">Initial or renewal audit</th> <th colspan="2">Surveillance audit</th> </tr> <tr> <th>Consequence</th> <th>Close-out*</th> <th>Consequence</th> <th>Close-out *</th> </tr> </thead> <tbody> <tr> <td>Critical</td> <td>Certification denied until the non- conformities have been closed</td> <td>Action plan < 14 days Verification < 72 days</td> <td>Certificate suspended and cannot be re-instated until the non- conformities have been closed. In case the non-conformities are not resolved within the</td> <td>Action plan < 14 days Verification < 72 days</td> </tr> </tbody> </table>	Non-conformity	Initial or renewal audit		Surveillance audit		Consequence	Close-out*	Consequence	Close-out *	Critical	Certification denied until the non- conformities have been closed	Action plan < 14 days Verification < 72 days	Certificate suspended and cannot be re-instated until the non- conformities have been closed. In case the non-conformities are not resolved within the	Action plan < 14 days Verification < 72 days
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	<p>➤ Suspended or withdrawn operators may not claim to be GTP-approved, nor undertake contracts that specify GTP registration without advising the client.</p> <p>Where a GTP operator has their certification suspended or withdrawn, the Certification Body will be entitled to provide an explanation of the reasons for suspension or withdrawal, on request, to other GTP operators who have a contract with the suspended or withdrawn operator at the time of the suspension or withdrawal.</p>		<table border="1"> <tr> <td data-bbox="1220 193 1370 284"></td> <td data-bbox="1370 193 1572 284"></td> <td data-bbox="1572 193 1744 284"></td> <td data-bbox="1744 193 2024 284">maximum suspension period of 72 calendar days, the certificate will be withdrawn</td> <td data-bbox="2024 193 2181 284"></td> </tr> <tr> <td data-bbox="1220 284 1370 552">Major</td> <td data-bbox="1370 284 1572 552">Certification denied until the non- conformities have been closed</td> <td data-bbox="1572 284 1744 552">Action plan < 42 days Verification < 72 days</td> <td data-bbox="1744 284 2024 552">Certification continues. Evidence that non-conformities have been closed will be checked within 72 days. In case a non- conformity is not resolved and closed by then, it becomes a critical non-conformity</td> <td data-bbox="2024 284 2181 552">Action plan < 42 days Verification < 72 days</td> </tr> <tr> <td data-bbox="1220 552 1370 1072">Minor</td> <td data-bbox="1370 552 1572 1072">Certification granted when less than 10 minors. When 10 or more minor non-conformities verification are found the rules for a major non-conformity apply.</td> <td data-bbox="1572 552 1744 1072">Action plan < 42 days When less than 10 minors verification at the next visit.</td> <td data-bbox="1744 552 2024 1072">Certification continues when less than 10 minors. An agreement on the action plan must be taken between the operator and the CB. Evidence that non-conformities have been closed will be checked by the auditor during the next visit at the latest. In case a non-conformity is not resolved and closed by then it becomes a major non-conformity. When 10 or more minor non-conformities are found the rules for a major non-conformity apply.</td> <td data-bbox="2024 552 2181 1072">Action plan < 42 days after receipt list non-conformities Verification: next visit</td> </tr> </table> <p>-* after receipt list non- conformities (final audit day).</p> <p>The suspension will be published in the register of certificates under “suspended” on the EFISC-GTP website and in the “news” section.</p>				maximum suspension period of 72 calendar days, the certificate will be withdrawn		Major	Certification denied until the non- conformities have been closed	Action plan < 42 days Verification < 72 days	Certification continues. Evidence that non-conformities have been closed will be checked within 72 days. In case a non- conformity is not resolved and closed by then, it becomes a critical non-conformity	Action plan < 42 days Verification < 72 days	Minor	Certification granted when less than 10 minors. When 10 or more minor non-conformities verification are found the rules for a major non-conformity apply.	Action plan < 42 days When less than 10 minors verification at the next visit.	Certification continues when less than 10 minors. An agreement on the action plan must be taken between the operator and the CB. Evidence that non-conformities have been closed will be checked by the auditor during the next visit at the latest. In case a non-conformity is not resolved and closed by then it becomes a major non-conformity. When 10 or more minor non-conformities are found the rules for a major non-conformity apply.	Action plan < 42 days after receipt list non-conformities Verification: next visit
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15.3	<p>Appeals</p> <p>A GTP operator has the right of appeal against decisions made by the Certification Body and COCERAL. During the appeal, the operator will remain approved until the final decision of the appeal is made. However, this will be viewed on a case by case basis depending on the severity of the non-conformities.</p> <p>Appeals shall be made in writing to the Certification Body within 14 days of being advised of a decision that is the subject of appeal.</p> <p>The Certification Body acknowledges appeals and an initial investigation is made by the Certification Body’s scheme manager. COCERAL shall be informed at all times by the Certification Body.</p>																	

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	<p>If the Certification Body's scheme manager does not support the decision against which the appeal is based then the Certification Body will correct the erroneous decision.</p> <p>If the scheme manager supports the decision on which the appeal is based then an independent panel, which will include a COCERAL representative, is convened to handle the appeal. The Certification Body, COCERAL and the operator are entitled to attend the appeals panel and present information to the panel. The panel is appointed by the Certification Body and COCERAL as an independent, neutral committee. The members of the panel should not be employed by the operator, the shareholders or any other operator active in the market stages. Resolutions and decisions of the sanction board are delivered in the name of the panel by the chairperson or his/her deputy. The members of the panel are obliged to observe strict confidentiality with regard to all matters of which they acquire knowledge in this capacity. The independent appeals panel makes a ruling based on information supplied during the hearing. The ruling of the appeals panel is binding and final on the Certification Body and operator. The appeals panel will be convened within 30 days of receipt of the appeal.</p>																								
16	<p>Financial conditions</p> <p>The certified operator which is registered on the public list must pay to the recognised Certification Body the following GTP fees which vary according to the number of sites included into the scope of the GTP certification.</p> <table border="1"> <thead> <tr> <th>Number of sites</th> <th>1</th> <th>2-20</th> <th>21-49</th> <th>50-99</th> <th>100-199</th> <th>> 200</th> </tr> </thead> <tbody> <tr> <td>GTP certification fees</td> <td>€ 350</td> <td>€ 400</td> <td>€ 450</td> <td>€ 500</td> <td>€ 550</td> <td>€ 600</td> </tr> </tbody> </table>	Number of sites	1	2-20	21-49	50-99	100-199	> 200	GTP certification fees	€ 350	€ 400	€ 450	€ 500	€ 550	€ 600	ANNEX 1	<p>Fee system</p> <p>Certification Body As an integral part of their agreement with EFISC-GTP Aisbl the certification body will pay to EFISC-GTP an annual license fee for each of the relevant scopes For the year 2017- 2020 the license fee is fixed as follows</p> <table border="1"> <tbody> <tr> <td>Scope D</td> <td>2500 EUR</td> </tr> <tr> <td>Scope G and F</td> <td>2000 EUR</td> </tr> </tbody> </table> <p>Operator The operator will pay for each location and sector scope an annual fee to EFISC-GTP Aisbl of</p> <table border="1"> <tbody> <tr> <td>Scope D</td> <td>400</td> </tr> <tr> <td>Scope G and F</td> <td>350</td> </tr> </tbody> </table>	Scope D	2500 EUR	Scope G and F	2000 EUR	Scope D	400	Scope G and F	350
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Annex 1	<p>Multisite certification</p> <p>Introduction The following rules are meant to cover the certification of management systems in organisations with a network of sites spread out in a vast geographical area. They aim at ensuring that the audit provides adequate confidence that the operator complies with the scheme requirements while taking into account practical and economic considerations related to the specificities of certain operators such as collectors and storekeepers with numerous sites.</p> <p>Scope and boundaries These rules apply to operators holding a multisite organisation, being a unique legal entity or not, where all sites shall have a legal or contractual link with the central office of the operator and be subject to a common management system which is laid down, established and subject to surveillance and internal audits by the central office. Trading companies where no physical</p>	7.1.1	<p>Multi-site certification</p> <p>Multi-site certification is not permitted under the scope D (Animal Feed production) Multi-site certification is permitted under the scope F (Distribution) and G (Provision of transport and storage services). See reference ISO/TS 22003:2013 Table A.1</p> <p>7.1.1.1 Requirements for multi-site certification under the scope F and G The following requirements are meant to cover the certification of management systems in organisations with a network of sites spread out in a vast geographical area. They aim at ensuring that the audit provides adequate confidence that the operator complies with the scheme requirements while taking into account practical and economic considerations related to the specificities of certain operators such as collectors and storekeepers with numerous sites. EFISC-GTP considers the EU internal market as one geographical area.</p> <p>7.1.1.2 Scope and boundaries These requirements apply to operators holding a multisite organisation, being a unique legal entity or not,</p>																						

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<p>be audited</p> <p>B. Internal audits All sites, including the central office, must be internally audited every year by a competent staff member of the operator (e.g. quality manager, site manager or other company representative). The planning for internal audits as well as the results of such audits must be documented. The internal audit reporting must be drawn up in such a way that the Certification Body can make use of this information when auditing the central office.</p> <p><u>Additional requirements</u> If a new location joins a company or a group of companies then a verification of the relevant subjects must take place at the central office and the new location should be audited according to the principles referred to above and along the following rules:</p> <p><u>Case 1: Merger/Acquisition of company (A acquires B)</u></p> <ul style="list-style-type: none"> ➤ A is certified whereas B is not: if A wishes, it may incorporate some or all sites of B. In this case, company A will define its new scope of certification. The multisite certification (and sampling) rules will apply on all sites of the new scope of certification. ➤ A is not certified whereas B is: possibility to transfer the certificate from B to A as long as the scope and conditions for obtaining a certificate (including actual quality procedures) remain unchanged. In this case, company A defines its scope of certification. The multi-site certification (and sampling) rules will apply on all sites included in its scope of certification. ➤ Both A and B are certified: <ul style="list-style-type: none"> - Follow the cycle of A. In this case, company A will define its new scope of certification. The multisite certification (and sampling) rules will apply on all sites of the new scope of certification. <p>Or</p> <ul style="list-style-type: none"> - Keep 2 certificates corresponding to the scopes of both merging companies, for a limited period of 12 months from the date of merger, leaving enough flexibility to put common procedures into practice, then a single certificate. <p><u>Case 2: Creation of company C (C acquires both A and B)</u></p> <ul style="list-style-type: none"> ➤ New certificate for C (initial audit) <p>In this case, company C will define its scope of certification. The multisite certification (and sampling) rules will apply on all sites that company C has included in its scope of certification.</p> <p>Or</p> <p>Keep 2 certificates corresponding to the scopes of both merging companies, for a limited period of 12 months from the date of merger, leaving enough flexibility to put common procedures into practice, then a new certificate (initial audit).</p> <p>Irrespective of the scenario of the merger between two or more companies, the time frame of the certification coverage cannot exceed the 12 months period initially foreseen (this applies even if one of the incorporate sites will thus have to undergo an audit within less than 12 months compared to the previous one).</p>		<table border="1"> <tr> <td>Number of sites above 20</td> <td>0</td><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td> </tr> <tr> <td>Additional number of sites to audit</td> <td>0</td><td>1</td><td>1</td><td>1</td><td>1</td><td>1</td><td>2</td><td>2</td><td>2</td><td>2</td><td>2</td><td>3</td> </tr> <tr> <td>Number of sites to be audited</td> <td>2-20</td><td>21</td><td>21</td><td>21</td><td>21</td><td>21</td><td>22</td><td>22</td><td>22</td><td>22</td><td>22</td><td>23</td> </tr> </table>	Number of sites above 20	0	1	2	3	4	5	6	7	8	9	10	11	Additional number of sites to audit	0	1	1	1	1	1	2	2	2	2	2	3	Number of sites to be audited	2-20	21	21	21	21	21	22	22	22	22	22	23
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<p>Annex 2</p> <p>AUDIT REPORT FORMAT</p>	<p>Annex 4</p>	<p>MODEL OF AUDIT REPORT</p>																																							

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<p>Annex 3</p>	<p>Audit duration formula</p> <p>Calculation criteria</p> <p>The criteria for the calculation of the average audit duration which must be taken into account:</p> <ul style="list-style-type: none"> • The number of major silos that were sampled such as the registered office, the dryer or main storage long duration (A) • The number of secondary* silos that were sampled (B) • The average time for visiting a major silo (C) • The average duration of a documentary audit according to the average staff of the operator (D) • The already existing certifications (as referred to in Appendix 6 of the GTP code) that were taken into account (E) <p>*A silo is considered secondary when it has no permanent staff and has restricted opening period.</p> <p>The number of sampled silos is calculated in compliance with the sampling rules laid down in Annex 1.</p> <p>Indicative elements for calculation</p> <table border="1" data-bbox="197 715 902 1070"> <tr> <td>Average time for visiting a major site (C)</td> <td>0,5 day</td> </tr> <tr> <td>Average duration of documentary audit according to the staff (D)</td> <td></td> </tr> <tr> <td>1 to 30 persons</td> <td>0,25 day</td> </tr> <tr> <td>more than 30 persons</td> <td>0,5 day</td> </tr> <tr> <td>Reduction percentage in case of already existing equivalent/recognised certifications (E) of quality management as referred to in Appendix 6 of the GTP code</td> <td>25%</td> </tr> <tr> <td>Reduction percentage in case of already verified items of food and feed safety standards in full compliance with the items of the GTP audit checklist</td> <td>At least 80% item by item in conformity with GTP</td> </tr> </table> <ul style="list-style-type: none"> • Calculation formula for the average audit duration Average duration = [(A + B/2) * C + D] * (1 – E) The result is expressed in days of audit, rounded up to the nearest half day. 	Average time for visiting a major site (C)	0,5 day	Average duration of documentary audit according to the staff (D)		1 to 30 persons	0,25 day	more than 30 persons	0,5 day	Reduction percentage in case of already existing equivalent/recognised certifications (E) of quality management as referred to in Appendix 6 of the GTP code	25%	Reduction percentage in case of already verified items of food and feed safety standards in full compliance with the items of the GTP audit checklist	At least 80% item by item in conformity with GTP	<p>7.1.3</p>	<p>Determination of audit time</p> <p>Audit duration is dependent on the number of parallel processes to be audited at the same location within the scope of the FSMS to be certified. One audit day is 8 hours. Auditor time stated does not include reporting. Reporting time is to be agreed between the operator and the CB. Typically reporting time is 0.5 day per site but can vary depending of the size, complexity and audit combinations. Initial certification, re-certification, surveillance audits and unannounced audits may be combined with audits of other management systems. The defined audit time will ensure the effectiveness and depth of the assessment of the FSMS, GMP, GHP, HACCP and PRP in compliance with the requirements in the EFISC-GTP Code and the relevant sector document. Depending of the complexity of the products and or processes and the number of FTE (full time equivalents)/ employees involved in feed/food ingredient related activities as well as the possible previous audit results the certification body defines the audit time together with the operator. When an organisation deploys workers in shifts and the products and/or processes are similar, the FTE number will be calculated based on employees on the main shift (including seasonal workers) plus feed/food safety related office workers. When properly documented and justified, a reduction can be made for a less complex organisation measured by number of employees, size of the organisation and/or product volume or within categories having a basic audit time of less than 1.5 day audit time. A HACCP study corresponds to a hazard analysis for a family of products /services with similar hazards and similar production technology and, where relevant, similar storage technology. If the scope of one specific operator covers more than one category, the audit time calculation shall be taken from the highest recommended basic audit time. Additional time is required for each HACCP study.</p> <p>Initial audit:</p> <p>An initial audit takes place at the location of an applicant seeking certification against the EFISC-GTP Code. It should be carried out by checking the whole sections of the EFISC-GTP Code. See table §7.1.4 Minimum initial audit and re-certification audit time for the relevant scope and time calculation</p> <p>Surveillance audit:</p> <p>A surveillance audit is a periodical audit performed to ensure that an organization still meets EFISC-GTP requirements. Depending on the previous audit results as well as the complexity of the products and or processes the CB defines the audit time together with the operator. The auditor ensures to address all EFISC-GTP requirements during the total of the two surveillance audits. Typical audit time for surveillance visits is set on 75 % of the initial audit time with a minimum of 1 audit day. See table §7.1.4 Minimum initial audit and re-certification audit time for the relevant scope and time calculation</p> <p>Re- certification audit:</p> <p>A re- certification audit takes place at the end of a certification period. The audit must be planned in due time in order to avoid expiration of the certificate. It should be carried out by checking all sections of the EFISC-GTP Code. Audit time for renewal of the certificate is identical to an initial audit. See table §7.1.4 Minimum initial audit and re-certification audit time for the relevant scope and time calculation</p> <p>Special audits:</p> <p>It may be necessary that an audit is conducted by the certification body at short notice, in the following cases:</p> <ol style="list-style-type: none"> 1. If the operator is involved in an feed/food safety incident 2. Follow up of the audit which is listed on the EFISC-GTP website under review <p>It is the responsibility of the Certifying Body to increase the audit time if the complexity of processes or the auditee’s organisation calls for this.</p> <p>Unannounced audits</p> <p>Typical audit duration for an unannounced audit is 4 hours, including reporting. The operator can indicate up</p>
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			to 15 days in the year that the audit cannot take place. The days should be used when the site is not in production. The unannounced audit will take place during week days.
Annex 4	<p>Examples of impartiality statement</p> <p>To the Certification Board</p> <p><i>I (We) hereby confirm that all work conducted on behalf of the certification company will be carried out with impartiality. Any financial, commercial, technical or other association with clients or producer groups that could affect impartiality will be declared to the certification company. Typically these may involve:</i></p> <ul style="list-style-type: none"> • <i>Advising a client how to meet Scheme Requirements</i> • <i>Receiving payment or reward directly from a client</i> • <i>Owning client operator shares (refer to Technical Director)</i> • <i>Designing or supplying products of the same type as those offered by clients</i> • <i>Close personal relationships (including family) with client employees</i> • <i>Offering consultancy, services or advice to the client in any aspect of their business operations</i> • <i>Receiving presents or hospitality from a client (other than typical marketing gifts and sustenance).</i> <p><i>If these or other circumstances arise that may cause an actual or perceived loss of impartiality, I give my assurance that I will advise the Technical Director.</i></p>		
Annex 5	<p>Assessment form for operators</p> <p>COCERAL have a policy of review and continuous improvement for the GTP Code. By completing this form, you will be contributing to future updates of the Scheme, ensuring that GTP continues to fulfil the needs of your business and provide assurance to your customers.</p> <p>All audited companies must have the opportunity to give their opinion on the auditor, on the Certification Body and on the GTP Code. The appropriate assessment form must be returned to COCERAL.</p>		

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