

	Instruction for GLOBALGAP Remote Audit	Doc Nr	TI 75
		Date	14.07.2020
		Rev Nr	00
		Page	1/11

1. Purpose

This instruction to be followed for verifying compliance due to the Coronavirus Pandemic. ETKO will develop case related measures to inform its personnel and the clients.

2. Scope

This instruction covers the measures to be taken against the **CORONA – COVID – 19** Pandemic and also initial certification, re-certification, certificate scope extension, transfer, etc. based on fully remote inspections/audits. This instruction will be applied for the GLOBALG.A.P. private standard.

3. Responsibilities

This procedure is prepared and implemented by the Management and QMR which the other department responsible will be involved according to the decision of the management.

ETKO updates this procedure according to current information depending on the developments with regard to COVID-19 and shares with the personnel which dealing with GLOBALG.A.P certification.

ETKO staff members who is dealing with GLOBALG.A.P certification process to read and understand this instruction to implement appropriately.

4. Application

Due to movement/travel restrictions within some regions imposed as a result of the coronavirus, GLOBALG.A.P. inspections/audits that become due will be postponed. Unless otherwise specified in this procedure, the respective rules of the given standard and/or add-on apply.

This procedure is to be implemented for all control points, similar to an on-site inspection/audit.

This procedure does not address certification for new and existing clients based on remote inspections/audits.

Initial certifications based only on this procedure does not be considered certified until the first on-site follow-up inspection/audit has been successfully completed.

This procedure also applies to GRASP which is an GLOBALG.A.P. add-on as approval by the add-on owner. In case an GRASP inspection/audit was conducted based on this procedure, this is added as a product attribute into the GLOBALG.A.P. database.

Whenever this procedure has been used to issue a certificate or to extend the scope of an existing one, this is clearly indicated to inform all market participants or the public, that the certificate or the extension is based on remote inspections/audits.

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	Instruction for GLOBALGAP Remote Audit	Doc Nr	TI 75
		Date	14.07.2020
		Rev Nr	00
		Page	2/11

4.1. General Information

This instruction applies only when official travel restrictions are in place in the country or region (where the inspection shall take place) or of the producer that is based on an official or reputable source.

This instruction includes:

1. **A Review of Documents and Records:** The Review of Documents and Records similar to the off-site module as defined in the GLOBALG.A.P. general regulations v5.2 Part I, 5.1.2.1, 5.2.2.1, and Part III, 5.2, 5.4.1.1, which can be performed offline or online.
2. **A Virtual Meeting:** The Virtual Meeting to check all requirements that would normally need to be reviewed on-site and could not be answered during “The Review of Documents and Records”. Both “The Review of Documents and Records” and “The Virtual Meeting” are conducted remotely and may be performed at once or in two (or more) separate parts, as decided by ETKO using information and communication technology (ICT).

The Document Review and Virtual Meeting don’t be performed more than 4 weeks apart. These 4 weeks are also including the planning and testing of the ICT used for the remote inspection.

During the registration process, ETKO does collect information and verify that the producer has the necessary infrastructure to support the use of the ICT proposed for remote inspection. Records are kept.

The use of this instruction is identified in the GLOBALG.A.P. Database and on the producer’s paper certificate. This instruction is established as a product attribute on the certificate. The paper certificate is also indicating the risk level together with the Remote attribute (e.g., Apple-Remote-Low risk).

This instruction may result in a negative decision for certification; not only by the relevant provisions described in the general regulations, but also if the integrity of the remote inspection is jeopardized.

In the case of re-certification, if the certificate has not been extended yet, the registered products is accepted by ETKO in the GLOBALG.A.P. Database for the new cycle.

If the producer has already asked for a certificate extension and The CB has accepted the certificate extension and the new cycle, the producer is not allowed to change the CB unless the outgoing CB allows the transfer.

ETKO classify the producers according to the risk of issuing a certificate based on this instruction by using the risk categories listed below:

- a. **Not eligible:** This instruction does not conduct for producers where more than 10 non-conformances (Major Must control points or QMS) were identified during each of the last two on-site inspections (i.e., including announced, unannounced, and surveillance inspections) on the date of the inspection. These producers are only be certified based on an on-site inspection.
- b. **High Risk:** New producers (those never certified before for GLOBALG.A.P. or whose certificate expired more than 12 months ago), and companies taking physical possession of bulk products bought directly or via a subcontractor.

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- c. Medium Risk:** Re-certification of producers with non-conformances identified during the last on-site inspection on the date of the inspection, producers that change CBs (If the new CB cannot verify that during each of the last two on-site inspections no more than 10 non-conformances (Major Must control points or QMS) were identified, the producer is classified as "not eligible" for this instruction) and producers whose certificate expired less than 12 months ago. For GRASP, producers with any overall assessment result other than "fully compliant".
- d. Low Risk:** Re-certification of producers with no non-conformances identified during the last on-site inspection. For GRASP, producers with previous overall assessment result "fully compliant".

For this instruction, the full final inspection report, including the checklist, is made available to GLOBALG.A.P. Producers is agreeing that the full inspection report is made available to GLOBALG.A.P. Any information relating to an identified or identifiable natural person such as names or data clearly linkable to responsible persons or any other employees does not be entered in the "Remarks/Comments" filed of the full inspection report.

The checklist is always uploaded through GLOBALG.A.P. Audit Online within 28 days after the closure of any outstanding non-conformances.

For GRASP the regular upload procedure in the GLOBALG.A.P. database is applied.

All requirements related to inspection timing defined in the GLOBALG.A.P. General Regulations apply without change, unless indicated otherwise in this document.

The overall duration for remote inspections does not less than the usual on-site inspection performed by the ETKO and the duration defined in the respective normative documents, if applicable. Common practice indicates that remote inspections require additional time.

ETKO justify and record if no additional time was required for the remote inspection.

In cases of subsequent inspection (except in the case of a transfer between CBs) and scope extensions, ETKO use the same inspector for the remote inspection who also performed the previous inspection.

The document review and the virtual meeting of Remote Inspection is performed by the same inspector(s).

If the Produce Handling Unit(PHU) is subcontracted and does not have a valid GLOBALG.A.P. IFA (or Remote Inspection) certificate, a remote inspection of the PHU is performed as well.

For maintenance of inspector competency, exceptions to requirements for the annual minimum number of inspections and internal witnessing is granted on a case-by-case basis.

For the rotation of inspectors, exceptions is granted on a case-by-case basis.

Remote Inspections is not applied for unannounced inspections. For compliance with the 10% unannounced inspections and 10% unannounced QMS audits, exceptions is granted on a case-by-case basis.

PREPARED BY	APPROVED BY
QMS RESPONSIBLE	MANAGING DIRECTOR

	Instruction for GLOBALGAP Remote Audit	Doc Nr	TI 75
		Date	14.07.2020
		Rev Nr	00
		Page	4/11

4.2. Rules for Planning and Scheduling of Remote Inspection

4.2.1. Security and Confidentiality

4.2.1.1. The use of Information and Communication Technology (ICT) for inspection purposes is mutually agreed upon by the auditee and ETKO performing the inspection in accordance with information security and data protection measures and regulations before ICT is used. Video and/or audio recording, screenshots, and storage of evidence is also mutually agreed. ETKO keeps records of the agreement.

4.2.1.2. In case of no agreement or non-fulfilment of this information, security and data protection measures, and the use of ICT for inspection, Remote Inspection does not perform.

4.2.2. Planning and Scheduling of Remote Inspection

4.2.2.1. The feasibility of the inspection is determined to provide confidence that the inspection objectives is achieved. This takes into consideration factors such as:

- a) Sufficient and appropriate information for planning and conducting the inspection
- b) Adequate cooperation from the producer
- c) Adequate time and resources for conducting the inspection

4.2.2.2. ETKO defines eligibility criteria for determining when it is appropriate to perform an inspection remotely, such as:

- a) The acceptable period for performing a remote inspection
- b) The producer's ability to designate one or more representatives or contact persons who are capable of communicating in the same language as the inspector and using the agreed platform
- c) ETKO's capability and aptitude to conduct the remote inspection in the chosen medium/forum of the remote inspection
- d) The availability of a list of activities, areas, information, and personnel to be involved in the remote inspection

4.2.3. Planning of Technology and Equipment

4.2.3.1. Before the remote inspection takes place, ETKO is:

- a) Determine the platform (e.g., virtual meeting app, wearable technology, telephone/video call, messaging app, drones, or other platforms, etc.) for hosting the inspection. This platform is agreed upon between ETKO and the producer.
- b) Explain to the producer which documents, activities, facilities are expected to be inspected via video streaming (real time) and which will be evaluated based on records/recorded information, and additionally, if applicable, which people need to be interviewed.
- c) Test the ICT platform compatibility between ETKO and the producer prior to inspection. A trial meeting using the same media platforms agreed upon is conducted to ensure the scheduled inspection is performed as planned.
- d) Encourage and consider the use of webcams, cameras, etc. when physical evaluation of an event is desired or necessary.

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QMS RESPONSIBLE	MANAGING DIRECTOR

- e) If the remote inspection is impossible due to technical restraints, (e.g., no phone or internet connection on the farm, etc.) Remote Inspection is not used as option for inspection.

4.2.4. Performing the Remote Inspection

4.2.4.1. The remote inspection is facilitated in quiet environments whenever possible to avoid interference and background noise (e.g., through speakerphones).

4.2.4.2. Both parties make their best effort to confirm what was heard, stated and read throughout the inspection.

4.2.4.3. All remote inspections is are concluded in the same way as the on-site inspections according to the GLOBALG.A.P. General Regulation (e.g., closing meeting, clarification of findings, non-conformances, etc.).

4.2.4.4. The start time, the end time, and the participants of the remote inspection is recorded. Evidence of opening and closing meetings is kept even if there were multiple sessions. Electronic acknowledgement of receipt is equivalent to “signature”.

4.2.4.5. The time frame for follow-up actions (closure of non-compliances) begins with the end of the remote inspection, i.e., the closing meeting when the findings are communicated.

4.2.4.6. The fact that the inspection was conducted remotely, as well as the software and any technical problems during the inspection, is noted in the inspection report.

4.2.4.7. If it is not possible to maintain satisfactory connections or conditions during the scheduled time of the remote inspection, ETKO inspector may terminate the inspection before the scheduled time. This is recorded in the inspection report.

4.2.4.8. The inspection may continue later only if ETKO and the producer both agree on this. The continuation of the remote inspection follow the planning as described above. This is confirmed during the opening meeting.

4.3. Rules for Planning and Scheduling of Remote Inspection

4.3.1. Security and Confidentiality

4.3.1.1. The use of ICT for inspection purposes is mutually agreed upon by the auditee and ETKO performing the inspection in accordance with information security and data protection measures and regulations before ICT is used. Video and/or audio recording, screenshots, and storage of evidence is also mutually agreed. ETKO keep records of the agreement.

4.3.1.2. In case of no agreement or non-fulfilment of this information, security and data protection measures, and the use of ICT for inspection, Remote Inspection is not performed.

4.3.2. Planning and Scheduling of Remote Inspection

4.3.2.1. The feasibility of the inspection is determined to provide confidence that the inspection objectives is achieved. This take into consideration factors such as:

- a) Sufficient and appropriate information for planning and conducting the inspection
- b) Adequate cooperation from the producer
- c) Adequate time and resources for conducting the inspection

4.3.2.2. ETKO defines eligibility criteria for determining when it is appropriate to perform an inspection remotely, such as:

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- a) Acceptable period for performing a remote inspection
- b) The producer’s ability to designate one or more representatives or contact persons who are capable of communicating in the same language as the inspector and using the agreed platform.
- c) ETKO capability and aptitude to conduct the remote inspection in the chosen medium/forum of the remote inspection
- d) The availability of a list of activities, areas, information, and personnel to be involved in the remote inspection

4.3.3. Planning of Technology and Equipment

4.3.3.1. Before the remote inspection takes place, ETKO:

- a) Determine the platform (e.g., virtual meeting app, wearable technology, telephone/video call, messaging app, drones, or other platforms, etc.) for hosting the inspection. This platform needs to be agreed upon between ETKO and the producer.
- b) Explain to the producer which documents, activities, facilities are expected to be inspected via video streaming (real time) and which will be evaluated based on records/recorded information, and additionally, if applicable, which people need to be interviewed.
- c) Test the ICT platform compatibility between ETKO and the producer prior to inspection. A trial meeting using the same media platforms agreed upon is conducted to ensure the scheduled inspection can be performed as planned.
- d) Encourage and consider the use of webcams, cameras, etc. when physical evaluation of an event is desired or necessary.
- e) If the remote inspection is impossible due to technical restraints, (e.g., no phone or internet connection on the farm, etc.) Remote Inspection is not used as option for inspection.

4.3.4. Performing the Remote Inspection

4.3.4.1. The remote inspection is facilitated in quiet environments whenever possible to avoid interference and background noise (e.g., through speakerphones).

4.3.4.2. Both parties make their best effort to confirm what was heard, stated, and read throughout the inspection.

4.3.4.3. All remote inspections is concluded in the same way as the on-site inspections according to the GLOBALG.A.P. General Regulations (e.g., closing meeting, clarification of findings, non-conformances, etc.).

4.3.4.4. The start time, the end time, and the participants of the remote inspection is recorded. Evidence of opening and closing meetings is kept even if there were multiple sessions. Electronic acknowledgement of receipt is equivalent to “signature”.

4.3.4.5. The time frame for follow-up actions (closure of non-compliances) begins with the end of the remote inspection, i.e., the closing meeting when the findings are communicated.

4.3.4.6. The fact that the inspection was conducted remotely, as well as the software and any technical problems during the inspection, is noted in the inspection report.

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4.3.4.7. If it is not possible to maintain satisfactory connections or conditions during the scheduled time of the remote inspection, ETKO may terminate the inspection before the scheduled time. This is recorded in the inspection report.

4.3.4.8. The inspection may continue later only if ETKO and the producer both agree on this. The continuation of the remote inspection follow the planning as described above. This is confirmed during the opening meeting.

4.4. Rules for Conducting Remote Inspection

4.4.1. The inspector is aware of the ICT's risk and opportunities and the impacts that they may have on the credibility and objectivity of the information gathered. It is the responsibility of ETKO to train the inspector accordingly, including on the contents of this instruction and GLOBALG.A.P. training material, when available. No additional sign-off on the part of GLOBALG.A.P. is necessary.

4.4.2. The means of verifications that may be used for the virtual meeting part of Remote Inspection is:

- a) Interview with the auditee. Worker interviews may be conducted by phone or video call interviews. For GRASP this may be used for all needed interviews.
- b) Video call in which the auditee shows records.
- c) Video call in which the auditee streams video of the site/facility to the inspector. However, all the observed evidence is recorded in the checklist. Video streaming of the site/facility may be done by the producer or by an assigned person ETKO chooses, who need not necessarily be an inspector.
- d) Sending pictures/videos instantly during the interviews. The files include information on the time and geo-reference for the location, or this information is available by other means.

4.4.3. The inspection report contains details about the different means used during the remote inspection in order to demonstrate the proper implementation of this procedure.

4.4.4. ETKO informs the producer when, how, why, and of what to make recordings, pictures, or video footage and which will be saved as evidence, why, and for how long will they be stored. The producer agrees and, if applicable, give consent and send/submit/transmit the evidence to ETKO within the agreed timeframe.

4.4.5. The following guidelines apply and are mandatory when inspecting different requirements. For the IFA standard for Fruit and Vegetables, the use of the Inspection Guideline and Methodology is mandatory. For GRASP, the use of the GRASP Remote Assessment Guideline Checklist is mandatory.

4.4.5.1. The following 5 inspection methods is used:

- a) V- Visual assessment
- b) I- Interview with personnel
- c) D- Records or document review
- d) X- Cross-checking data and information, verifying data, linking records with each other and confirming their accuracy
- e) C- Challenging the content and plausibility of the information (e.g., when checking the risk assessments)

4.4.5.2. Control Points and Compliance Criteria(CPCC) and GRASP control points requiring V-Visual assessment. Remote inspection includes live video streaming (telephone camera, tablet camera, etc.).

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If online video streaming is not possible, pictures (with indicated date and time) or videos (traceable to the time and date of the video shooting) may be acceptable. Those offline visuals are taken at the date of the remote inspection and at the request of the inspector. Inspection report contains detailed justification/comments what was shown and how it was shown. The inspector is obliged to challenge critical areas in order to obtain as much as possible visual information to justify compliance with the checked control points.

4.4.5.3. CPCC and GRASP control points requiring I-Interview. Before the interview can begin, the inspector and the auditee confirm their identity. The best way is to perform the interview via an audio and video communication channel, which will establish the identity of the producer and the person interviewed and their knowledge (for example, familiarization with procedures and rules and not reading a text to answer the questions). If possible, telephone calls without video is avoided. During interviews, the auditee ensures a quiet environment. If workers on the farm are interviewed and those workers do not speak the language of the inspector (e.g., seasonal foreign workers, GRASP assessments), translations are ensured by a representative of the auditee to the inspector in the same way as is usually done during on-site inspections.

4.4.5.4. CPCC and GRAPS control points requiring D-Records or document check. Documents and records may be checked during the document review and/or the virtual meeting parts. The check can include emailing photos or scans, sending copies by e-mail, and/or faxing. As currently stated in GLOBALG.A.P. General Regulation, the off-site inspection "...consists of a desk review of documentation sent by the producer to ETKO before the inspection, including the self-assessment, risk assessments, procedures required in several CPCC, veterinary health plan (where applicable), analysis program (frequency, parameters, locations), analysis reports, licenses, list of medicines used, list of plant protection products used, proof of lab accreditation, certificates or inspection reports of subcontracted activities, plant protection products/fertilizers/medicines application records, etc." It may also include: harvesting records, mass balance records, training records with latest amendments related to COVID-19, calibration records, documentary proof of PPE; allowance for medical checks (not the results), stock list for both plant protection products and fertilizer, cleaning records for toilets, PPPL, GRASP Declaration, complaint procedures, working contracts, etc.

During the virtual meeting: sampling of other records/documents are made available in real time, the records are sent immediately by e-mail, photo, etc. This applies also to those records which were already inspected during the document review. ETKO takes all possible measures to mitigate the risk of receiving fraudulent records during the inspection.

4.4.5.5. CPCC and GRASP control points requiring X-Cross-checking data and information, verifying data, linking records with each other and confirming their accuracy. The remote inspection provides means to cross-check data and information in real time or with a minimal delay (if sending the information is required for the review by the inspector). A blended approach with audio/video or only audio is possible, provided that the requested documents are sent

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without delay, which will eliminate the risk that documents (or records) are corrected based on the inspector questions. Screen sharing may be a good option. The goal is to ensure that the information is consistent.

- 4.4.5.6. CPCC and GRASP control points requiring C-Challenging the content of the information. The content of the information (instructions, procedures, risk assessments) can be checked during the document review or during the virtual meeting. The goal is to ensure that the information is plausible.

4.5. Remote Inspection Procedure for High-Risk Classification

- 4.5.1.** Initial applications/certifications are considered high-risk for Remote Inspection according to risk classification and require special attention, vigilance, and integrity from all involved CBs.
- 4.5.2.** During the registration process, ETKO does collect information and verify that the producer has the necessary infrastructure to support the use of the ICT proposed for remote inspection. Records are kept.
- 4.5.3.** Follow-up on-site inspection:
- 4.5.3.1. ETKO performs a follow-up on-site inspection of 100% of the high-risk producers during the validity of the certificate. In the case of new producers, the follow-up on-site inspections are performed within 6 weeks after the travel restrictions are lifted.
- 4.5.3.2. This may be an announced or an unannounced inspection.
- 4.5.3.3. For all follow-up on-site inspections, the full checklist is used.
- 4.5.3.4. Unannounced follow-up on-site inspection may be counted towards the 10% unannounced inspections.
- 4.5.3.5. It is likely that the harvest and/or the handling period is already over during the inspection, but some relevant agronomic activities are ongoing on the farm when the follow-up on-site inspection takes places.
- 4.5.3.6. The information already verified during the remote inspection may also be used for the follow-up on-site inspection.
- 4.5.3.7. If no travel restrictions apply and the follow-up on-site inspection has not been performed within the deadlines defined in 4.5.3.1, the certificate is suspended and cancelled. (Producers that have received a cancellation is not accepted for GLOBALG.A.P. certification within 12 months of the date of cancellation).
- 4.5.3.8. A successful follow-up on-site inspection will allow the remote attribute on the certificate to be removed.
- 4.5.4.** Initial certifications based on Remote Inspection is not considered accredited certificates until the follow-up on-site inspection has been completed, in the standards where accreditation is applicable. Where the scheme itself is accredited, the certificate for initial inspection based on Remote Inspection is not display the accreditation body logo. Once the follow-up on-site inspection is successfully completed, a new certificate may be issued with the accreditation body logo.
- #### 4.6. Remote Inspection Procedure for Medium-Risk Classification
- 4.6.1.** If the certificate has already been extended, GLOBALG.A.P. will process transfer requests coming only from the outgoing CB which extended the certificate validity. The transfer is finalized only when the incoming CB has completed the

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remote inspection and the outgoing CB explicitly asks for the termination of the extension and authorizes GLOBALG.A.P. to transfer the producer to the new CB.

- 4.6.2.** ETKO performs follow-up on-site inspections of 5% of the total number of the medium-risk producers during the validity of the certificate. The 5% are calculated per certificate holder and not per standard or add-on. The 5% is rounded up to the nearest whole number. The successful on-site inspection will allow the remote attribute on the certificate to be removed.
- 4.6.3.** Follow-up on-site inspection may be announced or unannounced.
- 4.6.4.** For all follow-up on-site inspections, the full checklist is used.
- 4.6.5.** Unannounced follow-up on-site inspections may be counted towards the 10% unannounced inspections.
- 4.6.6.** Producers who have not received follow-up on-site inspections have the right to ask for on-site inspection, whenever the conditions allow. A successful on-site inspection will allow the remote attribute on the certificate to be removed. The producer acknowledges that this may result in additional certification costs.
- 4.7. Remote Inspection Procedure for Low-Risk Classification**
- 4.7.1.** The producer has the right to ask for an on-site inspection whenever the conditions allow. A successful on-site inspection will allow the remote attribute on the certificate to be removed. The producer acknowledges that this may result in additional certification costs.
- 4.7.2.** ETKO is not required to perform follow-up on-site inspections during the validity of the certificate for producers with low-risk classification.
- 4.8. Remote Inspection Procedure for Certificate Scope Extension**
- 4.8.1.** The “GLOBALG.A.P. Emergency Procedure for Certificate Extension due to the Coronavirus Pandemic” (26 March 2020) allows scope extension (adding a new crop) only if the new crop belongs to the same crop grouping (in terms of harvest and handling) as already certified. This instruction provides possibilities for scope extensions (adding new product(s)) to the existing certificates even if the new product(s) are not in the same crop grouping. If the producer is a holder of a valid certificate, is classified in an eligible risk rating, and requests scope extension for adding new product, this instruction can be used, following the rules described for low-risk classification. Additionally:
 - 4.8.1.1.** Before product extension, a full checklist and report for this new product(s) is completed and uploaded.
 - 4.8.1.2.** The new product is added to the existing GLOBALG.A.P. certificate, indicating the remote attribute. The “valid to” date of the original certificate remains unchanged.
- 4.8.2.** In the case of adding a new production site to an Option 1 producer (multi-site without QMS), the new site(s) is inspected remotely before adding them to the certificate.
- 4.8.3.** If, on a certificate with QMS (Option 1 or Option 2), more than 10% of producers/sites and/or area are added or changed, the square root of the new number of producers/sites are inspected remotely before adding them to the certificate.
- 4.8.4.** If the producer refuses the remote inspection, The certificate’s scope cannot be extended.

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4.9. Additional Clarification for Option 2 and Option 1 Multisite with QMS Remote Inspection

- 4.9.1.** The QMS announced inspection may be performed using Remote Inspection Instruction. This may also include those procedures centrally managed by the QMS, but applicable at member level.
- 4.9.2.** The rules described in this instruction for high-, medium-, and low-risk producers apply.
- 4.9.3.** The sample size for the producer group members is not reduced as defined by GLOBALG.A.P. General Regulation v5.2 Part I, 5.2.3 and Part III, 5.4.2. It remains the square root (or 50% of the square root) of the number of members.
- 4.9.4.** At member level, the on-site inspection maybe replaced by this instruction.
- 4.9.5.** The surveillance inspection (of 50% of the square root of the number of sites/producers) may also be performed remotely. The need for a follow-up on-site surveillance inspection depends on the certificate holder risk level.
- 4.9.6.** If the re-certification QMS audit and the producer member inspections were performed remotely for high-risk certificate holder(s) and where the medium-risk certificate holder(s) were selected for a follow-up inspection, the follow-up on-site inspection and follow-up on-site QMS audit may be combined with the on-site surveillance inspection.
- 4.9.7.** If no on-site follow-up inspections (in the case of medium- and low-risk classification) were done during Remote Inspection certificate validity, the re-certification audit includes the full square root of the current number of the members/sites.
- 4.9.8.** Internal inspections is not performed using Remote Inspection.

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