



GLOBALG.A.P. Risk Assessment on Social Practice (GRASP)

General Rules

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1 APPLICATION OF GRASP GENERAL RULES AND GLOBALG.A.P. GENERAL REGULATIONS

This document describes specific rules applying to the GRASP add-on and creates the framework within which a producer or producer group shall comply with the principles and criteria (P&Cs) of this add-on in addition to those of the base standard. The results of the add-on audit do not affect the audit result of the base standard.

The basis for this document is the latest GLOBALG.A.P. general regulations, which should be consulted while reading these general regulations specifications.

For all requirements that are not described in this document, the valid version of the GLOBALG.A.P. general regulations shall apply.

At all times, the GLOBALG.A.P. general regulations shall be understood and applied with a view to protecting the integrity, nature, and good application of the GRASP assessment. The GLOBALG.A.P. general regulations shall therefore be applied to these rules accordingly, interpreting the wording in line with the nature and subjects of GRASP. If there is a conflict between the GLOBALG.A.P. general regulations and this document, the rule that allows a better safeguarding of the GRASP assessment's integrity shall be applied.

GRASP P&Cs are voluntary requirements.

2 GRASP NORMATIVE DOCUMENTS

Normative documents for GRASP are the latest GLOBALG.A.P. general regulations, the GRASP general rules, GRASP P&Cs, GRASP country risk classification concept interview rules, and any document defined by Agraya GmbH as a normative document for GRASP.

The current list of GRASP normative and supporting documents can always be found on the GLOBALG.A.P. website.

3 GRASP APPLICATION OPTIONS

GRASP is applicable to the same scope of Integrated Farm Assurance (IFA)/Crops for Processing (CfP) or a benchmarked scheme. In other words, when applicants register for GRASP, they shall include all production processes covered by the primary production standard.

GRASP applies only to producers with a valid certification according to a GLOBALG.A.P. primary production standard or an equivalent benchmarked scheme.

In addition, for any GRASP application, evidence shall be submitted of the verification of P&Cs on workers' health, safety, and welfare. A full compliance result in this category is required to obtain the letter of conformance.

GRASP is **not** applicable if the producer did not employ any type of labor during the current certification period.

GRASP does not apply to:

Option 1 individual producers, or Option 1 multisite producers with or without QMS if they are not a family farm and employed neither workers nor subcontracted labor during the current certification period.

However:



- GRASP is applicable to family farms (Option 1 or Option 2 producer group members) without hired labor during the current certification period. If the family farm achieves the required level of conformance and evidence on workers' health, safety, and welfare P&Cs with full compliance, a letter of conformance will be issued.
 - Family farms shall be assessed on lack of hired labor and selected P&Cs from the GRASP checklist.
 - Non-labor-employing sites of multisite producers (Options 1 and 3 – multisite with QMS) as well as producer group members (Options 2 and 4 – group certification) will be considered in the internal and external GRASP QMS audits and visited by the auditor to assess on the lack of hired labor. These producers shall also provide evidence on workers' health, safety, and welfare P&Cs with full compliance.

3.1 GRASP application to product handling units

It is not possible to assess only product handling units (PHUs) or the producer group's own production sites. GRASP is applicable to PHUs only if product handling is included in the scope of the GLOBALG.A.P. standard or of the equivalent benchmarked scheme certification.

In such a case, the PHU(s) and/or the producer group's own production site(s) shall be included as **another** producer group member/production site in the GRASP assessment and shall be assessed **in addition** to the producer group members/production sites. PHUs shall also provide evidence on workers' well-being P&Cs with a full compliance. The "GLOBALG.A.P. general regulations – Rules for producer groups and multisite producers with QMS" shall apply.

3.2 GRASP application to labor subcontractors, other subcontractors, and visitors

GRASP is applicable to the activities of any subcontractor hired by the producer to provide farm labor (including farm labor and equipment, farm labor and material, or some combination of farm labor, material, and equipment) for the main farming activities of agricultural production on the premises of the PHU or production site. These workers/types of farm labor shall be included in the GRASP assessment. The phrase "main farming activities" refers to those activities directly related to the production of the product (including, e.g., pruning of the fruit trees, but excluding construction of a farm barn).

Subcontractors providing services or activities other than supplying workers/labor for the main farming activities are excluded from the GRASP assessment unless the assessor detects the risk of a GRASP integrity issue.

Also excluded from the GRASP assessment are subcontractors that provide only (machinery) services (e.g., ploughing, sowing), where machinery is handled by the subcontractor themselves – with the subcontractor working on their own account – as an independent subcontractor or operated by the subcontractor's workers.

Harvest crews or harvest services are not excluded even if they use machinery. They shall be included in the GRASP assessment if their activities are in the scope of the producer's IFA certificate.

For visitors or subcontractors providing services or outsourced activities that require the presence of subcontractor staff on the farm, the certification body (CB) shall check that the producer has communicated a zero-tolerance policy with regard to non-compliances with human rights and local laws during the subcontractor staff's presence on the farm (GRASP human rights policy).



During the registration with the CB, the producer shall inform the CB about the subcontracted labor activities. The producer shall ensure that the labor subcontractor or employment agency follows the GRASP requirements.

4 INDIVIDUAL PRODUCER AND PRODUCER GROUP REQUIREMENTS

Any GRASP applicant shall follow the GLOBALG.A.P. general regulations on individual and producer group requirements in addition to the GRASP general rules.

5 GRASP REGISTRATION PROCESS

Any GRASP registration topic shall follow the GLOBALG.A.P. general regulations and the following GRASP-specific rules:

	Permitted	Prohibited
Registering the same product with more than one CB		x
Registering the same product under more than one Option (as individual producer and producer group member)		x
Registering production sites in different countries (exceptions granted by Agraya GmbH only on a case-by-case basis)		x

The applicant shall register for GRASP with the same CB as for the primary production standard. The applicant shall include information on the number of workers during the year and on the type of workers hired (permanent, seasonal, national, foreign migrant) disaggregated by **gender** (male/female/other).

The applicant shall indicate whether subcontracted labor is hired and if so, the number of workers under this condition during the current certification period.

The applicant shall indicate whether the farm is run as family farm (run as core family business) and indicate the number of family members working and the family relation of the group.

Applicants with a QMS shall indicate the total number of producer group members/production sites and how many of these are with workers and without workers.

5.1 Registration of a CB for the GRASP add-on

- In cases where an Agraya GmbH finally approved CB uses auditors who are *already qualified* for GLOBALG.A.P. primary production audits, those auditors will be authorized to carry out GRASP assessments if they comply with the additional qualification requirements indicated in this document.
- Approved CBs may use auditors who are not qualified for GLOBALG.A.P. primary production audits, but are certified social auditors, to accompany GLOBALG.A.P. primary production auditors during GRASP assessments. These social auditors shall comply with the formal skills indicated in this document.



5.2 CB approval process

As a condition for CB approval, the applicant CB shall have at least one approved GRASP assessor (to perform the assessment) and one approved GRASP assessor (for the CB decision-making committee) who have both completed all applicable qualification requirements. The CB shall nominate an in-house trainer (IHT) and complete or at least register for the GRASP IHT training.

Approval shall be granted if all of the following apply:

- a) A staff member has attended the GRASP in-house training of the approved CB IHT and has passed the GRASP assessor online test when available in their working language.
- b) A staff member approved as the CB IHT has attended the GRASP IHT training offered by Agraya GmbH and passed the GRASP IHT test.
- c) The CB is accredited for any scope within the GLOBALG.A.P. primary production standards.

5.3 Special registration of assessors in countries without a NIG

CBs assessing GRASP in countries with no national interpretation guideline (NIG) shall undergo a special registration process.

The CB may apply for special registration in countries where no NIG exists by contacting Agraya GmbH.

Requirements for conducting a GRASP assessment in a no-NIG country:

The assessor shall demonstrate that their qualifications and technical skills refer to the country where the assessment will be conducted as indicated in this document.

- The CB shall provide a draft document of the GRASP NIGs, including explanation of how GRASP requirements correspond to local legislation. This document shall be reviewed and approved by the IHT.
- This document shall be submitted together with the application for GRASP assessments in a no-NIG country.

For information on the process of how to contribute to a NIG, please see the GRASP normative and supporting documents on the GLOBALG.A.P. website.

6 AUDIT PROCESS

In addition to the latest GLOBALG.A.P. general regulations, the following GRASP-specific rules and instructions provided in the supporting documents applicable to GRASP shall apply:

6.1 Self-assessments/Internal farm assessments

- a) For all producers, the GRASP self-assessment or internal farm assessment is obligatory. The self-assessment/internal farm assessment includes PHUs. In both cases, verification of full compliance with P&Cs on workers' health, safety, and welfare shall be included in the report.
- b) The self-assessment or internal farm assessment must each be carried out as indicated in the GLOBALG.A.P. general regulations.



- c) To ensure that all P&Cs have been properly assessed for all applicable sites/producers, the self-assessment/internal farm assessment shall be conducted during a time when the number of workers present is representative of the labor hired during the year/production period (especially subcontracted and seasonal labor) and agricultural activities are taking place (e.g., during peak season or harvesting). For family farms, the self-assessment/internal farm assessment shall have been completed before the CB external assessment and during the time with the highest presence of core family members working on the farm.
- d) The country risk level shall be checked and shall be adhered to in order to determine the required methods of evidence to be used in the internal farm audit. Interviews (where applicable) shall be conducted and cross-checked through document review. Information on this matter shall be included in the summary reports. **This rule does not apply to self-assessments under Option 1, Option 1 multisite without QMS, and family farms.**
- e) For every P&C assessed in all GRASP self-assessments/internal farm assessments, remarks and comments shall be given in all non-compliant Major Must and Minor Must P&Cs. The summary reports shall provide objective evidence (e.g., interviews where applicable) and information on how the producer complies with the GRASP requirements, and shall list any non-compliances and/or non-conformances identified. Comments and evidence, such as which document(s) were sampled or which workers were interviewed, shall be site- and product-specific and included in the full checklist with all P&Cs, ensuring that all applicable P&Cs have been properly assessed for all relevant production sites and products.

6.2 Third-party assessments

- a) GRASP requires a third-party assessment conducted by an independent, finally approved CB. This third-party assessment shall be carried out by assessors who meet the requirements as defined in this document.
- b) The GRASP assessment shall be conducted together with the primary production audit.
- c) The GRASP assessment shall be carried out by the same CB conducting the primary production audit.
- d) The GRASP assessment may be carried out, but a letter of conformance shall not be provided until **after** verification of the producer's full compliance with P&Cs on workers' health, safety, and welfare.
- e) The assessor shall use the GRASP checklist for Option 1, Option 2, and family farms, accordingly. All are available in the GLOBALG.A.P. IT platform.
- f) Before conducting the assessment, the assessor shall check the country risk level and determine the required methods of evidence. In addition, the assessor shall check and register (by employment, migratory status, and gender) the number of workers present on the farm visited **on the day of assessment**. The assessor shall apply the correct sample sizes for document review and where applicable the sample size for interviews. The rules can be found in the normative documents on the GLOBALG.A.P. website.
- g) Due to the social nature of GRASP, remarks and comments shall be given in all cases (Yes/No) for every P&C assessed in all external assessments. Remarks and comments (e.g., which document was/which documents were sampled) shall be site-specific and included in the checklist, showing that all the P&Cs have been properly assessed. Responsibility for a lack of included remarks rests with the CB.



- h) A full written summary of the assessment activity undertaken shall be given by the CB. This shall provide objective evidence and information on how the producer complies with the GRASP requirements, and, where applicable, shall list any non-compliances and/or non-conformances identified. Comments and evidence, such as which document(s) were sampled, which workers were interviewed, etc., shall be site- and product-specific and included in the checklist to ensure that all the P&Cs have been properly audited for all applicable production sites, PHUs and products.
- i) In the audit report, CB assessors shall provide qualitative information about the company (i.e., the organizational structure; location of the production sites, PHU(s), and (head/human resource) office; and, if applicable, the different seasons of activities or intervals of hiring labor/fluctuation, etc.).
- j) During the external GRASP QMS audit, the GRASP QMS checklist shall be used. Comments on GRASP compliance (Yes/No) shall always be included for each applicable P&C. If a P&C is considered not applicable to GRASP, complete reasoning for the inapplicability shall be included. Responsibility for a lack of reasoning rests with the CB.
- k) Names and personal data of responsible persons or other workers shall not be entered in any remark or comment of the GRASP checklist. Instead, initials/other abbreviations shall be used. Alternatively, the position of the worker or internal codes/numbers assigned by the producer/company may be used.
- l) Other personal data of workers (e.g., contract, time records, pay slips) must be accessible to the assessor and must be provided by the employer. To ensure proper provision of data and transparency, producers and CBs must have signed license agreements and contracts aligned with the GLOBALG.A.P. general regulations and the national data protection laws of the countries of operation.
- m) In countries where a GRASP NIG exists, the CB shall use it applying the rule that provides more protection to the workers. If GRASP provides more protection, then it overrides the local law, and in case the local law provides more protection, it will override the GRASP P&Cs. A regulation in the NIG cannot provide compliance without verification. Omission of a topic in the NIG shall be always corrected applying the GRASP P&Cs. However, inclusion of a topic in the NIG does not allow for a modification or change of the GRASP P&Cs. This will be applied by CBs and reviewed by the GRASP integrity program.

6.2.1 Assessment procedure for labor subcontractors

- a) The CB assesses the subcontracted labor compliance with GRASP P&Cs as part of the producer's responsibility and duty of care during the GRASP assessment of the producer.
- b) The producer is responsible for providing the CB with evidence of labor subcontractors GRASP compliance. If the CB is not able to verify compliance due to a lack of necessary evidence of the subcontractor (e.g., lack of documents or no access to evidence), a non-conformance shall be raised for the respective P&C. To ensure proper provision of data and transparency, producers and certification bodies shall have signed license agreements and contracts aligned with GLOBALG.A.P. general regulations and the national data protection laws of the countries of operation.
- c) The CB can choose to visit an office/production site at the labor subcontractor's premises. Labor subcontractors shall agree (in their commercial agreement with the producer) that finally approved CBs for GRASP are allowed to verify GRASP assessments through a physical CB audit where there is doubt. Inclusion of this clause is the responsibility of the producer.



- d) Any non-compliance raised during the assessment of the subcontracted labor activities shall be recorded as non-compliance of the producer. These non-compliances are subject to corrective actions following the GLOBALG.A.P. general regulations. The producer shall provide evidence to the assessor that the non-compliance was corrected. If corrections were not implemented by the subcontractor, the producer shall have evidence that a warning has been issued and/or termination of the commercial relationship after lack of response by the subcontractor has occurred.
- e) The CB shall raise an additional non-compliance for the relevant P&Cs assessment if the internal QMS assessment or self-assessment recorded the subcontractor's non-compliance and no correction was sought. "Seeking correction" is defined as submitting a written request for correction. The producer is also considered non-compliant if the requested corrections were not followed up on until proof of correction is provided.
- f) If the labor subcontractor holds a valid, official, and current proof of social auditing/compliance for the same scope under the base standard – including GRASP P&Cs and the base standard's P&Cs on workers' health, safety, and welfare – the assessor may consider the labor subcontractor's compliance to be verified. The proof shall be the same service they provide to the producer. The subcontractor's proof of auditing/compliance can be provided at group level with verification, at each producer group member included in the external assessment, or as part of the commercial contract signed by the producer group.
- g) In all cases of subcontracted labor assessments, the assessor shall include the remarks in each P&C (yes/no) of the checklist.

6.2.2 Duty of communication to subcontractors or other visitors in the farm.

- a) Visitors and subcontractors other than labor subcontractors are not under the scope of GRASP and they shall not be assessed.
- b) The producer is responsible for communicating to visitors and visiting subcontractors that enter the premises of the producer registered for GRASP that there is no tolerance of non-compliances related to the producer's human rights policy.
- c) The producer shall present evidence to the CB of both of the following points:
 - (i) The producer has communicated to any visitor and subcontractors visiting about the producer's zero-tolerance policy regarding violations of human rights and local laws.
 - (ii) If violations were detected on the farm, the producer has requested an immediate end of the activity on the premises of the producer.
- d) Lack of evidence of communication or of the request to immediately stop the activity shall be raised in the GRASP checklist as non-compliance with the duty to communicate the human rights policy to subcontractors.



6.2.3 Assessment under Option 1 individual producer without QMS

- a) The results/corrections of the self-assessments are verified during the external assessment. Internally, each production site shall be assessed.
- b) The CB shall follow the GLOBALG.A.P. general regulations for audit processes for initial and recertification assessments. In order to facilitate worker interviews, the timing of the assessment shall take into account the availability of workers on the day of the assessment and the presence/accessibility of the worker representation on the day of the assessment. **Only if workers are not present at all, shall the assessment be rescheduled.**

	Initial and subsequent years
Producer self-assessment	1. Entire scope (all registered products, production sites, and PHUs as registered for IFA/CfP or equivalent standard) annually
CB audit	1. Initial: entire scope (all registered products, production sites, and PHUs as registered for IFA/CfP or equivalent standard) – announced 2. Recertification: entire scope (all registered products, production sites, and PHUs as registered for IFA/CfP or equivalent standard) annually – announced, but 10% chance of being unannounced

6.2.4 Assessment under Option 1 multisite with QMS and Option 2 group certification (producer group members, PHUs, and producer group's own production site)

- a) The results of the internal QMS audit shall be kept and summarized in the GRASP internal checklist for producer groups and Option 1 multisites with QMS.
- b) The annual external assessment carried out by a GRASP approved CB uses the GRASP QMS checklist to determine how the QMS functions with respect to the GRASP P&Cs. It evaluates and checks the applicability of the QMS procedures and systems to the scope of GRASP (e.g., all producer group members/production sites have been internally assessed). The GRASP v2 QMS assessment shall be conducted before the CB GRASP farm assessment of the producer group members/production sites, similarly to the QMS audit against the base standard.
- c) CB GRASP assessors shall include comments for all GRASP P&Cs in the checklist. In addition, the assessors shall review whether the internal QMS audit was conducted and what its results were.
- d) All producer group members, production sites, and PHUs with primary production base standard certification shall be registered for GRASP and considered for the sampling in the GRASP assessment. When sampling producer group members, production sites, and PHUs, the CB assessment will follow the GLOBALG.A.P. general regulations. The sample shall always be the same as the one selected for the audit against the base standard.
- e) The CB does not assess all producers of a producer group for GRASP but samples the square root of the number of producers and follows the sample rules of the GLOBALG.A.P. general regulations, complemented by the rules of this document. It is not the responsibility of the CB to determine each producer's compliance (this responsibility rests with the



applicant). The CB shall assess whether the applicant's internal controls are appropriate, and this is done during the CB QMS audit.

- f) The GRASP assessment of the central PHUs shall be conducted while they are in operation, any time before/during/after the CB farm audits.
- g) In initial, monitoring, and recertification assessments, the CB shall follow the GLOBALG.A.P. general regulations regarding audit processes (see table 2 below for a summary). In order to facilitate worker interviews, the timing of the assessment (and the distribution between monitoring and recertification visits) shall take into account the availability of the workers and the presence/accessibility of worker representation at the producer group members' production site on the day of the assessment. If the resulting sample contains producer group members at whose production site neither labor nor worker representation is present, the following applies:
 - The assessor shall verify the reasons for the absence of the workers and the worker representation.
 - In the report indicating that those producer group members were not assessed according to GRASP, the assessor shall include the notes on their verification of the reasons for the workers' absence. Considering the best interest of the assessment continuation and integrity, the CB may use the visit to conduct document review (if low-risk country sampling rules apply).
 - The assessor shall verify whether P&Cs on workers' health, safety, and welfare were fully complied with, whether workers were present during the audit, and how the situation (of labor present) is different for the GRASP assessment. Notes and explanations on this verification shall be included in the report.
 - In the next closest assessment or monitoring/recertification assessment, the CB shall include the producer group members with labor not present, requiring them to have workers present.
- h) For Option 2 producer groups, the complete absence of workers in the farm sample shall be considered a lack of necessary controls in the GRASP QMS activities and shall result in a non-compliance with the respective P&Cs in the checklist.

Table 2 Overview of GRASP assessments

	Initial assessment	Recertification assessment
Internally by the producer group/multisite producer with QMS		
Internal GRASP QMS assessment	Complete QMS	Complete QMS
Internal farm assessment	Entire scope (all registered producer group members/production sites and PHUs as registered for the base standard)	Entire scope (all registered producer group members/production sites and PHUs as registered for the base standard)



	Initial assessment	Recertification assessment
Externally by the CB		
CB GRASP QMS assessment	Certification assessment Complete QMS + square root of the total number of registered central PHUs while in operation; before CB farm assessments. (For aquaculture all the PHUs)	Recertification assessment Complete QMS + square root of the total number of registered central PHUs while in operation; annually, before CB farm assessments. (For aquaculture all the PHUs)
Unannounced CB GRASP QMS assessment	-	Recertification assessment Minimum of 10% of all producer groups/multisite producers with QMS
CB farm assessments	Certification assessment (Minimum) square root of the total number of registered producer group members/production sites	Recertification assessment a) If non-conformances detected during previous CB monitoring assessment: (minimum) square root of actual number of registered producer group members/production sites or b) If no non-conformances detected during previous CB monitoring assessment: (minimum) 80% of square root of actual number of registered producer group members/production sites
	CB monitoring assessment during certificate validity (Minimum) 20% of the square root of the actual number of certified producer group members/production sites	CB monitoring assessment during certificate validity The rest of the square root of the actual number of certified producer group members/production sites (That is, the square root minus the sample audited during the previous recertification audit. The minimum sample cannot be less than one producer group member/production site.)



- i) It is not possible to assess only the producer group's own production site. The producer group's own production site shall be counted as an additional producer group member in the sample of the Option 2 producer group member assessment.

Example: The number of producer group members with GRASP is 100, but the product that is supplied by the producer group members is cultivated by the group itself on its own field(s) as well. Thus, the number of producers that the CB assesses is the square root of 101, which is 11 and shall include the own field production.

- j) If they form part of a producer group, producers/production sites without workers and family farms without hired workers must also be included in the internal GRASP QMS assessment of the group to ensure that GRASP QMS procedures are implemented.
- k) If, during the certification period, workers are hired by producers/production sites (including family-run businesses) that form part of a producer/producer group and normally do not hire workers, GRASP shall likewise be implemented and a new internal GRASP QMS assessment and farm assessment against all the GRASP P&Cs shall be performed. This GRASP assessment shall include verification of full compliance with P&Cs on workers' health, safety, and welfare. This shall be done during the time that workers are present.
- l) If, during a certification period, workers are hired by producers/production sites (including family farms) that form part of a producer/producer group and normally do not hire workers, the QMS manager shall point those producer group members/production sites out to the CB. Those producer group members/production sites shall then be included in the next closest external GRASP assessment.
- If this is not feasible or workers will not be present, then the GRASP assessment shall be conducted on that production site after the notification provided by the QMS manager of the producer group.
 - If the specific GRASP assessment results in non-compliances that are not corrected, the CB shall immediately communicate this matter to Agraya GmbH to modify the letter of conformance of the group.
- m) Producer group members/Production sites without workers shall form part of the external sample during GRASP assessments with QMS. The composition of the sample shall reflect the percentage of family farms and producer group members without workers in the producer group. A physical external assessment by the CB is required.
- Example: A producer group has 100 members that register for GRASP. Of these members, 20 have no workers. The CB takes the square root sample of 10 producers; two producers must be without workers.
- n) Workerless producer group members/production sites included in the sample will be externally assessed to verify both the lack of hired labor during the year/year before the assessment and their full compliance with P&Cs on workers' health and safety. Among other steps, the CB shall conduct interviews with the management; cross-check information on workers' health and safety training, personal protective equipment, and other well-being aspects of the primary production certification checklist; consider the conditions of the farm; check official self-employment declarations of the producer; and review production and cross-check documentation with harvest yield data of IFA audits.
- o) Family farms included in the sample shall be assessed on the above circumstances (lack of hired labor) and selected P&Cs from the GRASP checklist. The respective P&C shall be given a compliance level and comments (any yes/no) and cannot be marked "not applicable".



- p) If a producer/producer group requests to add new producer group members/production sites (without workers), during the 12 months of the assessment validity, the GLOBALG.A.P. general regulations on registration of additional producer group members/production sites to the certificate shall apply, along with the following rules:
- Before being added, the new producer group members/production sites shall demonstrate full compliance with P&Cs on workers' health, safety, and welfare.
 - The producer group shall conduct an internal GRASP assessment of every new producer group member.
 - The CB shall ask for these new producer group members' internal assessments before adding the producer group members to the GRASP letter of conformance.
- q) If a producer/producer group requests to add new producer group members/production sites (family-run businesses or producer group members/production sites with workers) during the 12 months of the assessment validity, the GLOBALG.A.P. general regulations on registration of additional producer group members/production sites to the certificate shall apply, along with the following rules:

If the new producer group members/production sites added increase the total number of approved producer group members/production sites by up to 10% of the producer group members/production sites who are already GRASP assessed, the following applies:

- The producer group shall internally verify evidence of full compliance with IFA P&Cs on workers' health, safety, and welfare.
 - The producer group shall conduct an internal GRASP assessment of these new producer group members before approving them.
 - The CB shall request the internal GRASP assessment of these members and the internal GRASP QMS assessment, including evidence of full compliance with the base standard's P&Cs on workers' health, safety, and welfare.
- r) If the new producer group members/production sites added increase the total number of approved producer group members/production sites by more than 10%, or if the production area increases by more than 10% due to the new producer group members/production sites, the following applies.
- The CB shall require evidence of the new members' full compliance with the IFA P&Cs on workers' health, safety, and welfare and follow the GLOBALG.A.P. general regulations for this situation.
- s) If the external GRASP CB assessment of the sample of producer group members/production sites or PHUs reveals major differences between the results of the internal and external assessments, these differences shall be recorded in the GRASP checklist for each relevant P&C (under "Justification"). The same applies to the internal GRASP QMS assessment and any corrective action taken before the external assessment. Major differences could indicate that there is a serious fault in the internal assessment results, and the assessor shall proceed as indicated in the GLOBALG.A.P. general regulations.
- t) Any non-compliances, no matter where they are found (field, PHU, or subcontractor), shall be recorded in the GRASP checklist under "Justification" with reference to the production site, PHU, or labor subcontractor and to the corrective actions, if applied.



- u) The final GRASP assessment report shall include all findings and the final results for the entire producer/producer group/multisite producer and shall be presented during the closing meeting. The GRASP assessment report shall include the same information as described in the GLOBALG.A.P. general regulations. Where available, the CB shall use the assessment report template issued by the GLOBALG.A.P. IT platform .
- v) For every GRASP assessment, CBs shall complete the following documents:
 - One GRASP QMS assessment report for Option 2 producer groups or for Option 1 multisite producers with QMS, as well as the GRASP assessment reports for every sampled producer group member/production site/product handling unit (PHU)
 - One GRASP CB assessment report for Option 1 single site producers or Option 1 multisite producers without QMS (including any PHU, where applicable).

This applies to all types of CB assessments conducted against the GRASP add-on (i.e., initial, monitoring, unannounced, and recertification assessments).

6.3 Assessment procedure for subcontracted PHUs or other outsourced service

In addition to the latest GLOBALG.A.P. general regulations, the following GRASP-specific rules shall apply:

If one Agraya GmbH approved CB has, in a production period, already performed a GRASP assessment on a subcontracted PHU/other outsourced service under the scope of GRASP, another CB may accept the assessment result without reassessing the PHU/other outsourced service.

The second CB may accept a non-GLOBALG.A.P. audit/certificate of social compliance for a subcontracted PHU/other outsourced service if all of the following apply:

1. The subcontracted PHU/other outsourced service holds a valid proof of social auditing/certificate of social compliance.
2. The scope of the subcontracted PHU audit/certificate is the same scope as the GLOBALG.A.P. certification and GRASP.
3. The audit/certification includes the service of the subcontracted PHU/outsource activity provided to the producer who applied for GRASP.

7 GRASP ASSESSORS' QUALIFICATION REQUIREMENTS

In addition to the latest GLOBALG.A.P. general regulations, the following GRASP-specific rules shall apply:

7.1 Formal qualifications

For any GRASP external assessments, the GLOBALG.A.P. auditor qualification is required along with all the requirements below.

CB GRASP assessors conducting GRASP QMS assessments of Option 2 producer groups or Option 1 multisite producers with QMS shall comply with the CB QMS auditor qualifications.

CB GRASP assessors that conduct GRASP assessments of Option 1 single-site producers or Option 1 multisite producers without QMS or producer group members or production sites of multisite producers with QMS shall comply with the CB farm auditor qualifications.



Qualification requirements for auditors/assessors performing self-assessments and internal assessments follow the GLOBALG.A.P. general regulations on auditor/assessor qualifications and those included in this document.

7.2 Technical skills, training, and qualifications

- a) All assessors who are set to assess GRASP shall pass the GRASP assessor online test (when available in their working language) in the GLOBALG.A.P. IT platform.
- b) The IHT shall provide the required CB IHT training to all GRASP assessors.
- c) The IHT training shall include as social training topics: The GRASP P&Cs, the ILO conventions ratified in the country/countries in which the assessor will perform assessments (including development, issues, and legislative changes relevant to GRASP compliance in the country/countries in which the assessment shall be carried out), human rights concepts, and issues of forced labor and child labor in the countries in which the CB will perform GRASP assessments. Where a GRASP NIG is available, the relevant criteria and supporting regulations can follow what is outlined in the NIGs of the countries in which the CB performs GRASP assessments. (All shall be documented with agenda, list of participants, and certificates.) It is responsibility of the IHT to include in the training any information that may be missing in the NIG.
- d) The IHT training shall include interview and document review techniques applicable to the labor and social scope. These techniques shall reflect the customs and culture of the countries in which the CB will perform GRASP assessments.
- e) The training shall amount to (at least) a total of 12 effective hours (not less than 8 hours for social topics and 4 hours for interviews and document review). These hours can be reached by totaling several different trainings on the topics. Duration and content shall be indicated in the evidence provided for this requirement (course certificate(s), evidence of training(s) included in formal qualifications, etc.). This evidence shall be renewed every 3 years indicating any new courses and topics covered.
- f) If the assessor's personal qualification includes a formal qualification (academic degree) or the successful completion of a formal course (certified training by a third party), the IHT shall cover the missing topics and/or focus on the relevant changes and developments since the time when the assessor took the course or obtained the academic degree.
- g) All assessors shall have previous experience in assessments/audits in the country of application of GRASP, including similar criteria to the scope of GRASP and similar P&Cs on workers' health, safety, and welfare as in the base standard. This shall include at least: A minimum of two audits conducted, as auditor, in the country of application of GRASP (scheme or norm audited shall include similar criteria to the scope of GRASP and similar P&Cs on workers' well-being as in the base standard). This requirement may also be fulfilled when the GRASP assessor participates as an observer in such audits (audits against schemes that include criteria comparable to the scope of GRASP and to the base standard's P&Cs on workers' well-being).
- h) The assessor shall have "working language" skills in the corresponding native/working language that is used for trainings and work instructions to the workers in the country where the assessment will be conducted. This shall include locally used specialist terminology in the respective working language. The use of a translator may be approved to support the assessment. Any exceptions to this rule shall be discussed with and confirmed in writing by Agraya GmbH prior to the GRASP CB assessment.



- i) Assessment skills of the GRASP assessor shall also be verified through the following:
 - a. Witnessing one Option 1 individual producer or Option 2 producer group member and Option 2 GRASP QMS assessment conducted by an authorized GRASP assessor (evidence shall be documented by the authorized GRASP assessor.)
 - b. Conducting the following assessment/audit witnessed by the IHT:

The GRASP assessor shall assess at least one Option 1 individual producer or Option 2 producer group member and one Option 2 GRASP QMS assessment and shall be witnessed during this assessment by the IHT. The witness assessment can also be conducted by an already approved GRASP assessor of the same CB appointed by the IHT. The IHT will be responsible and accountable for this decision.

Both verifications (witnessing a GRASP assessment and conducting a witnessed assessment) can occur in a country different from the country where the assessment will be applied.

Observing and being witnessed while conducting an Option 2 GRASP QMS assessment is not mandatory for GRASP assessors who only conduct assessments of Option 1 single site producers or Option 1 multisite producers without QMS.
- j) A CB approved for GRASP may use a GLOBALG.A.P. auditor with some but not all of the skills required for GRASP if that auditor accompanies assessors who are not qualified for GLOBALG.A.P. primary production but are certified social auditors. The CB shall provide evidence on the social qualifications of the auditor(s) and of the points c), d), e), f), g), and h) above (accordingly even when not provided by the CB IHT). The CB is responsible for supporting the social auditor regarding the GRASP general rules on assessment procedure and the applicable GLOBALG.A.P. general regulations.
- k) These qualifications shall be verified by the CB prior to submitting any assessor approval to Agraya GmbH. CBs shall provide Agraya GmbH with a written statement confirming this, signed by the IHT.

7.3 Maintenance of competency

The CB shall have a procedure in place to maintain the knowledge and competency of the GRASP assessor.

- a) Training by the IHT shall be provided whenever there are changes in legislation. Equivalent external training may also be provided instead.
- b) GRASP assessors shall complete all new GRASP trainings once these are made available by Agraya GmbH.
- c) The CB shall carry out a GRASP witness assessment or reassessment for each of its GRASP assessors at least once every 4 years to verify competence.
- d) The CB shall ensure that every GRASP assessor conducts at least two assessments annually, at a number of different producers, to maintain competence.
- e) Systems shall be in place within the CB structure to have the GRASP assessors informed and aware of developments (e.g., NIGs), issues, and legislative changes relevant to GRASP in the country where they apply GRASP. Lack of knowledge of labor laws and regulations, or missing, contradictory, or unexplained/unaddressed labor information in the NIG, will not excuse non-compliance within the Agraya Integrity Program.



7.4 IHT qualifications

Before assessing GRASP, CBs must have a GRASP IHT responsible for training, qualification, and maintenance of competency of all GRASP assessors. This IHT shall comply with all the requirements indicated in the GLOBALG.A.P. general regulations and all of the following:

The selected GRASP IHT shall

1. Fulfill the GRASP assessor requirements indicated in this document and the GLOBALG.A.P. auditor requirements
2. Take the GRASP IHT training offered by Agraya GmbH and pass the GRASP IHT test
3. Take any GRASP IHT update training once available

7.4.1 Main activities of the IHT

- a) Setting up a system to demonstrate that key staff is informed and aware of developments, issues, and legislative changes relevant to compliance with the GRASP general rules (this document)
- b) Ensuring qualification updates of the GRASP assessors as soon as online training updates, legislative changes, and/or updates to the normative documents or GRASP NIGs are available
- c) Witnessing at least one GRASP Option 1 individual producer or Option 2 producer group member and one Option 2 GRASP QMS audit by a GRASP assessor before that assessor can be signed off
- d) Checking and assuming responsibility for any information submitted by the auditors to Agraya GmbH
- e) Informing Agraya GmbH within 24 hours of changes that affect the competency of any approved GRASP assessor

7.5 Formal qualifications for internal QMS and farm auditors in GRASP

Both must provide evidence of compliance with the qualification requirements in the GLOBALG.A.P. general regulations, along with the following:

- a) Knowledge of the GRASP general rules on evidence, country risk, and interviews
- b) Knowledge about and/or access to legal labor regulations, human rights issues, and ILO labor conventions
- c) Knowledge of the GRASP NIG (as soon as available) of the respective country
- d) Working language skills in the corresponding native/working language where the assessments will take place

8 GRASP COMPLIANCE SYSTEM

In addition to the latest GLOBALG.A.P. general regulations, the following GRASP-specific rules shall apply:

8.1 GRASP assessment results

The GRASP compliance level conformance is based on a scoring system result. The GRASP checklist consists of two levels of P&Cs: Major Musts and Minor Musts.



Compliance level requirements

- **Major Musts: 100% compliance** with all applicable Major Must P&Cs is compulsory in **all** the assessments.
- **Minor Musts: 70% compliance** with all Minor Must P&Cs is compulsory in the **initial** year assessments.
- **Minor Musts: 75% compliance** with all Minor Must P&Cs is compulsory in all the subsequent years' recertification and monitoring assessments.

Compliance rules only for **family farms without workers**:

- **Major Musts: 100% compliance** with all applicable Major Must P&Cs is compulsory in **all** the assessments.
- **Minor Musts:** any non-compliance of Minor Must P&Cs is accepted in the initial year assessments.
- **Minor Musts: 100%** compliance with all Minor Must P&Cs is compulsory in all *following subsequent years' recertifications and/or monitoring assessments*.

Minor Must calculations

For initial assessment

The minimum required Minor Must compliance in the initial assessment is calculated using the following formula:

$$\left\{ \begin{array}{c} \text{(Total number of} \\ \text{Minor Must P\&Cs:)} 25 \end{array} \right\} \times 70\% = \begin{array}{c} \text{(Minimum total} \\ \text{Minor Must P\&Cs} \\ \text{compliance} \\ \text{required)} \end{array}$$

That is, 25 Minor Must P&Cs $\times 0.7 = 25 \times 0.7 = 17.5$, which is rounded up to 18 Minor Must P&Cs to comply with, at minimum.

The maximum number of non-compliances to Minor Must P&Cs allowed is 7 (25 total – 18). Therefore, a producer must have at least 18 Minor Must P&Cs that are compliant and may have no more than 7 that are non-compliant.

If a producer has 17 compliant Minor Must P&Cs, this gives a compliance level of 68%, which would **not conform to the minimum compliance level of GRASP**.

Note: A score of 69.8%, for example, *cannot* be rounded up to 70% (the passing percentage).

For monitoring and recertification assessment

The minimum required Minor Must compliance is calculated using the following formula:

$$\left\{ \begin{array}{c} \text{(Total number of} \\ \text{Minor Must P\&Cs:)} 25 \end{array} \right\} \times 75\% = \begin{array}{c} \text{(Total Minor Must} \\ \text{P\&Cs compliance} \\ \text{required)} \end{array}$$

That is, 25 Minor Must P&Cs $\times 0.75 = 25 \times 0.75 = 18.75$, which is rounded up to 19 Minor Must P&Cs to comply with, at minimum.



8.2 Letter of conformance decision

The decision to provide the letter of conformance shall be made by an already qualified GRASP assessor different from the person who conducted the GRASP assessment and following the GLOBALG.A.P. general regulations and the rules in this document.

Confidentiality, data use, and data release

The detailed results of the GRASP assessment are visible solely to users of the GLOBALG.A.P. IT platform according to the terms and conditions in the data access rules.

The letter of conformance and results of the GRASP assessment are displayed in the GLOBALG.A.P. IT platform if and only if:

- a) The required levels of compliance are documented in the scoring system.
- b) A valid GLOBALG.A.P. primary production or equivalent benchmarked scheme certificate is at hand and there is evidence that P&Cs on workers' well-being were verified and fully compliant.

If the required levels are not reached due to non-compliances, and the non-compliances are *not* resolved, the GRASP checklist with all non-compliances, outstanding corrective actions, and respective remarks shall be available in the GLOBALG.A.P. IT platform. This is then the final assessment report, and the CB decision committee will issue a suspension and/or other sanctions following the GLOBALG.A.P. general regulations for producer non-conformances. This information will be available solely to users of the GLOBALG.A.P. IT platform according to the GRASP data access rules.

For Option 1 without QMS that requires a declaration that GRASP is not applicable, CBs may create a final assessment report indicating the verification of the CB assessor of the workerless situation during the current period.

8.3 Unannounced primary production recertification audit combined with GRASP assessment

The GRASP add-on does not require that producers receive unannounced monitoring assessments. However, GRASP shall be assessed together with the producer's/producer group's unannounced primary production audit when planned, following the GLOBALG.A.P. general regulations. In this case, the producer/producer group may be notified of the GRASP assessment as soon as the CB auditor is able to begin the unannounced primary production audit.

8.4 Non-compliance and non-conformance in GRASP

The CB shall apply the latest GLOBALG.A.P. general regulations related to producers, producer groups, or multisite producers with QMS and shall also apply any specific indication included in this document, with respect to:

- a) The handling of non-conformances detected during the CB audit
- b) The application of sanctions (warning, suspension, or cancelation)

A suspension or cancelation will result in the total prohibition (all products, all sites) of the use of the GRASP letter of conformance and any document that may be linked to the GRASP add-on.

A producer who has received a cancelation shall not be accepted for a new GRASP assessment for the period indicated in the GLOBALG.A.P. general regulations.



Non-compliances and non-conformances of producers/producer groups are recorded in the GLOBALG.A.P. IT platform and accessible based on the data access rules for this add-on.

8.5 Letter of conformance and assessment period

In addition to the latest GLOBALG.A.P. general regulations about the certification process, the following GRASP-specific rules shall apply:

- The GRASP letter of conformance shall be issued if and only if a valid GLOBALG.A.P. primary production or equivalent benchmarked scheme certificate is at hand and there is evidence that P&Cs on workers' well-being were verified and fully complied with.
- The GRASP letter of conformance shall be issued if and only if the required Major Must and Minor Must levels have been achieved and are documented in the GLOBALG.A.P. IT platform.
- The GRASP letter of conformance shall be issued to the same legal entity (i.e., producer group/multisite producer) holding the valid GLOBALG.A.P. primary production or equivalent benchmarked scheme certificate.
- The assessment approval period is 12 months, subject to any sanctions and extensions in accordance with the scope described.

8.6 Letter of conformance information

The letter of conformance will be issued by the GLOBALG.A.P. IT platform, following the latest GLOBALG.A.P. general regulations.

8.7 Integrity program

For the GRASP integrity program, the same rules apply as set for the integrity program in the currently valid GLOBALG.A.P. general regulations.

9 DECISION-MAKING/GOVERNANCE

Any decision on GRASP is under the final responsibility of the Agraya GmbH. An elected GRASP Technical Committee is responsible for all technical issues concerning the GRASP P&Cs, the NIGs, and all other GRASP normative and supporting documents.

10 ABBREVIATIONS AND DEFINITIONS OF TERMS

10.1 Abbreviations

The following acronyms apply to this and all other GRASP-related documents:

CB	Certification body
FAQs	Frequently asked questions
GRASP	GLOBALG.A.P. Risk Assessment on Social Practice
IHT	In-house trainer
ILO	International Labour Organization



NIG	National interpretation guideline
P&C(s)	Principle(s) and criteria
PHU	Product handling unit
QMS	Quality management system

10.2 Definitions/Glossary

Please refer to the GRASP glossary for a list of all definitions related to the GRASP add-on.



VERSION/EDITION UPDATE REGISTER

New document	Replaced document	Date of publication	Description of modifications
260901_GRASP_general_rules_interim_final_v2_1_Sep26_en	220929_GRASP_general_rules_v2_0_Sep22_en	1 September 2026	Entire document - Terminological changes related to company name change to "Agraya GmbH" - Term "subsequent audit/assessment" replaced with "recertification assessment" - Term "surveillance audit/assessment" replaced with "monitoring assessment" - Term "GLOBALG.A.P. IT systems" replaced with "GLOBALG.A.P. IT platform" - Deleted reference to the GLOBALG.A.P. general add-on rules - Corrected distinction between "audit" and "assessment" - Deleted references to AMC - Term "certification cycle" replaced with "certification period" 1 – rewording 1 – added reference to the GRASP country risk classification concept interview rules 3 – added clarifications about certification options 3.2 – added text 6.2.4 – adapted text 6.2.4 f) – added new point 6.2.4 h) – added new point 6.2.4 v) – added new point 8.1 – added clarification



If you want to receive more information on the modifications in this document, please contact Agraya GmbH at standard_support@agraya.com.

If the changes do not introduce new requirements to the standard, the version will remain “5.0” and an edition update shall be indicated with “5.0-x”. If the changes do affect compliance with the standard, the version name will change to “5.x”. A new version, e.g., v6.0, v7.0, etc., will always affect the accreditation of the standard.

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