Casalecchio di Reno, 12/06/2019

Standard GLOBALG.A.P. IFA – RINA SERVICES S.P.A. – TECHNICAL NEWS 01/2019

On February 1st 2019, the GlobalGap secretariat informed the Control Bodies about the publication of the update of the GlobalGap IFA Standard. In fact, version 5.2 of the standard becomes effective and mandatory starting from 1 August 2019 and replaces the previous version 5.1. Therefore all Producer / Producer Groups, even those who own a GlobalGap IFA certificate with expiration after 1 August 2019, will have to comply with the requirements of version 5.2; in this case, even if the re-certification audit will be conducted before the 1st of August, it must be in accordance with version 5.2; in this case, even if the re-certification audit will be conducted before the 1st of August, it has to be in accordance to the version 5.2.

The standard has not undergone substantial changes; however, in all the normative documents of the same, various corrections of the terminology and some important technical updates have been made.

The changes made to the standard are available on the website www.globalgap.org ; however Check-lists version 5.2 in Italian should be available only from August 2019.

With this note RINA SERVICES S.P.A. intends to summarize the technical updates in question and the modality of transposition by the undersigned Odc.

REVISION ON INTERNA DOCUMENTS

The regulatory changes introduced by version 5.2 have led to a review of the following operative instructions of RINA SERVICES S.P.A.

IS-CERTI-GLO-00

IS-CERTI-PRD_FOOD-01

The information questionnaire for the GlobalGap standard was also reviewed and renamed as follows: **QUAREGLO 07-2019;** the same comes into effect starting from 1st July 2019, replacing the previous version.

CHANGES IN CONTROL POINTS AND COMPLIANCE CRITERIA

All Farm Base Module(AF)

New Major Must Control Point AF 17.1 about non-conforming products.

It requires a documented procedure specifying that all non-conforming products shall be clearly identified and quarantined as appropriate. These products shall be handled or disposed of according to the nature of the problem and/or specific customer requirements.

Crops Base Module (CB)

Minor must control point CB 5.3.4 – clarification: The laboratory accredited against ISO 17025 or by competent national/local authorities for testing water (added: local).

Clarification of Annex CB 5 GLOBALG.A.P. Guideline B): 'Mandatory Minimum Criteria of a Residue Monitoring System (RMS)'.

The types of sampling are defined: first, second and third. In this regard it should be noted that the first part sampling is not considered acceptable for the purposes of a Residual Monitoring System (RMS).

The CB will enter into the merits of the evaluation of the RMS verifying that:

- It lists the minimum data the CB shall publish about their evaluated RMS, which the certification body itself will have to publish following the evaluation;

- In the basic requirements section, it requires that the producer register shall include identification code or GGN where available and that the records are detailed with respect to the manufacturer and product

- In the risk assessment section are taking in consideration, among the most relevant factors are the restrictions on commercial formulas registered in countries where phytosanitary treatment is carried out and the restrictions on MRLs (maximum permitted residues) in the countries of destination;

- When choosing the analysis methods are taken in consideration:

- *plant protection products that could potentially be distributed on the crop,*
- *plant protection products actually distributed on the crop,*
- *any other contaminants (eg persistent environmental pollutants);*

In the action plan section, it adds that the RMS shall inform the producer and the CB in case of an exceedance of the legal limit. This shall not lead to an automatic sanctioning of the producer; however, the CB shall investigate each case.

In this regard a specific check-list for the evaluation of the RMS will be implemented.

Fruit and Vegetables Module (FV)

Minor must control point FV 4.1.4 – clarification - (added: local).

The Laboratory which is responsible for carrying out the microbiological analysis of the water must be accredited ISO 17025 or by the competent national / local authorities.

Major must control point FV 5.1.1 – The hygiene risk assessment shall include pre and post farm gate transport, allergens, and transport vehicles

Major must control point FV 5.2.6 – Modification of CPCC: The vehicles to be checked are not limited for pre-farm gate transport and for harvested product only. It includes now pre- and post-farm gate transport and also packed products.

Major must control point FV 5.7.2 – CC: It adds that the point is applicable when no further washing takes place by the producer before the product is sold

Major must control point FV 5.9.1 Labelling of the finished product

Where the assessment indicates the risk of cross-contamination of potential food allergens, the product must be labeled in accordance with the current legislation on food allergens in the country of production and in the country (s) of destination.

The risk of cross-contamination (potential and intentional) must be considered when food allergens have been, for example, packaged on the same production line or using the same equipment. Devices used during the collection and packaging of the product as well as personal protective equipment (cross-reference with AF 1.2.1, AF, 1.2.2, enclosure AF 2 and FV 5.1.1) must also be taken into consideration.

Inspection Guideline FV 5.9.1 e FV 5.9.2

1.The product labelling is done according to the applicable food regulations of the country of the intended sale;

1.1 Inspection method

- Visual assesment – Check applied on-product label
- Document and record check
- Cross-check informations

1.2 Explanation of the inspection method

This point is not applicable when the final packaging (in the field or in the plant) does not take place under the ownership of the GlobalGap certificate holder. The expected country of sale must be identified or by demonstrating communication with customers that confirm the market (s) envisaged, or by selecting the status (or group of states) in which the products are to be marketed and presenting evidence of compliance with label requirements that meet current applicable food regulations of the state for which the sale is intended. Where the marketing is aimed at a group of states, the content of the product label must satisfy the most restrictive food regulations in force within the group. If the planned sales phase is not known and the product is also sold on the domestic market, the labeling must follow the applicable regulations regarding food in the country of production. This is the case where the manufacturer sells locally directly to consumers, to the local retailer or when the first buyer does not provide information to the manufacturer after a written request on the intended country of sale (destination country);

1.3 Comment Guideline (auditor / inspector only)

Record at this point the list of sales countries envisaged for at least one product / crop per group of homogeneous crops (group defined on the basis of risks for food safety during collection / handling activities);

2. Product labeling according to customer specifications

2.1 Inspection method:

- Visual assessment: Check applied on-product labels
- Document and record check
- Cross-check information

2.2 Inspection method explanation

This point is not applicable when the final packaging (in the field or in the plant) does not take place under the ownership of the GlobalGap certificate holder. The manufacturer must demonstrate that the customer's specifications, if present, have been implemented in the product labeling. There will be written evidence of communication between the manufacturer and the first purchaser regarding the customer's specifications regarding product labeling;

2.3 Guideline for commenting (auditor / inspector only)

Record in this point the list of customers for at least one product / one crop per group of homogeneous crops (group defined on the basis of food safety risks during harvesting / handling activities);

3. Food Allergen Labeling

3.1 Inspection method

- Visual assessment – Check applied on-product labels
- Document and record check
- Cross-check information

3.2 Inspection method explanation

The control point is not applicable where the written risk assessment about food allergens indicates no potential cross-contamination. Where the risk assessment's section about food allergens indicates potential cross-contamination the product shall be labeled with food allergens.

If the risk assessment indicates potential cross-contamination; this requirement is applicable even if there is no packing, product labeling, packaging in final consumer package, or final product labeling. When identified in the risk assessment, the allergen notification must be physically indicated on-product, even if there is no usual/common (e.g.: etiquette, sticker on the box) product label as the product may go for further processing, be re-packed, or may be mixed or packed with other product, therefore the recipient must know the potential allergens crosscontamination.

Labeling also applies to bulk product (e.g. potato ''big bag'' shall be affixed with a label indicating 'may contain peanuts'' where the risk assessment identified that the previous crops residue may be present).

The allergen labeling shall consider the list of allergens in the country of destination, when it is known.

When the destination country is not known the country of production legislation concerning allergen labeling applies.

The compliance criteria say: "Cross-contamination risk (potential and intentional) shall be considered where food allergens have […]". The 'intentional' means that it is known that food allergen have handled, e.g.: the producer grows and packs celery in the same facility that is used for other crops as well.

The risk assessment for potential food allergen cross-contamination shall consider substances applied during the production to the crop, for example some fertilizers may contain chitosan extracted from crustaceans which is a food allergen.

Food allergens in the EU

All foods have the potential to cause a food allergy, however there are groups of foods that are responsible for causing the majority of food allergies. In the EU, for example, 14 main allergens which are subject to labelling legislation have been identified: Celery, cereals containing gluten, eggs, fish, lupin (a kind of legume of the Fabaceae family), milk, molluscs, mustard, peanuts, sesame seeds, shellfish, soya, sulphur dioxide (used as an antioxidant and preservative, e.g. in dried fruits), and tree nuts. (EU Regulation No 1169/2011 https://eurlex.europa.eu/eli/reg/2011/1169/oj/eng)

Food allergens in the USA

The USA law identifies the eight most common allergenic foods. These foods account for 90 percent of food allergic reactions and are the food sources from which many other ingredients are derived. The eight foods identified by the law are: Milk, eggs, fish (e.g., bass, flounder, cod), Crustacean shellfish (e.g., crab, lobster, shrimp), tree nuts (e.g., almonds, walnuts, pecans), peanuts, wheat, soybeans. These eight foods, and any ingredient that contains protein derived from one or more of them, are designated as 'major food allergens'. (https://www.fda.gov/food/ingredientspackaginglabeling/foodallergens/def ault.htm)

3.3 Justification guideline (minimum comment in the CB report)

- Risk Assessment document identification (name or code + date/edition, etc.)
- Describe risk, when identified
- Annex FV 1, 5.1.1 (above decision tree) – text added to indicate that it is mandatory

Plant Propagation Material Module (PPM)

Minor must control point PPM 3.2.2 – clarification of transition period
Records of the supplier of the propagating material and identification of the lot number, which demonstrate traceability, must be kept.

The propagation material must be grown under the ownership of the certified multiplier / nursery at least 3 months before being sold as a certificate. In the event that the propagation cycle is less than 3 months, at least two thirds of the cycle must be carried out by the multiplier / nursery.

Other Changes – QMS Check-list (QMS)

- General Information – In the Check-list cover new questions, starting and ending times have been added;
- QM 1.2.1 (iii) – updated according to General Regulations Part II. N/A when Flexible Distribution is approved;
- QM1.3(ii) new control point introduced following the possibility of release by the Producers Group of a declaration of membership of the producer to option 2 certified according to the specifications provided by the General Rules Annex II.3;
- In the Product Handling section (postharvest manipulation) reported the above specifications for points:
- V FV 5.1.1, FV 5.2.6, FV 5.7.2, FV 5.9.1, FV 5.9.2.

For further details and / or any subsequent specifications / changes from what is reported in this technical note, always refer to the official documentation on the website: www.globalgap.org .

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