

CSA – GTP

*Audit and certification
rules*

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The certification rules of the CSA-GTP code allow:

- An objective verification of compliance with the auditing standards by the operators,
- Improved readability of the audit and certification system,
- Improved credibility of the certification obtained.

The owners of the CSA-GTP certification are Coop de France Métiers du grain, FNA and Synacomex.

1 - PURPOSE

This document describes the audit and certification system of the CSA-GTP code, based on the guide to good hygiene practices for the collection, storage, marketing and transport of cereals, oilseeds and protein crops, of the Guide to Good Hygiene Practices for Animal Nutrition (GBPNA) and the "GMO module". The regulation is applicable from 20/07/2020.

2. SCOPE

This document applies to all CSA-GTP audit certification contracts signed between a referenced Certification Body (CB) and an operator beneficiary of this certification.

3 - FIELD OF CERTIFICATION

CSA GTP certification is granted provided that the beneficiary operator is up to date with its annual CSA-GTP membership (with the Syndicat de Paris).

The owners of the CSA GTP reserve the right to suspend or withdraw the certification CSA-GTP and/or non GMO module of an operator, in case of:

- Major non-compliance made known to the owners by a customer of the company. A major non-conformity corresponds to the non-satisfaction of a requirement accompanied by an asterisk (*) in the CSA GTP code (i.e. critical deviations).
- Unfavourable behaviour calling into question the credibility of the guidelines or the maintenance of the acquired recognitions

3.1 Activities covered

1. The certification covers the activities of **collecting, storing, simple mechanical operations, marketing, transporting and direct farm dispatch *** of cereals, oilseeds and protein crops.

As soon as one of these activities (collection, storage, marketing, transport and direct farm delivery*) is carried out by the audited company, it **must** be included in the scope of certification.

*For direct farm delivery, the requirements apply to operators shipping directly from a farmer's facilities to a customer of the operator requesting CSA-GTP certification or equivalent. The list of farmers involved in direct farm shipments will not be attached to the certificate, nor posted on the website www.incograin.com, nor communicated by a third party other than the operator. Paragraph No. 8 relating to farm direct delivery will apply from 1 July 2018.

A few definitions:

- **Collection** corresponds to supplies from farmers;
- **Storage** includes self-storage or as service provision;
- **Marketing** refers to supplies from non-farm operators and marketing to customers;
- **Farm direct delivery** means the direct delivery of goods from a farmer's premises to a customer of the operator requesting CSA-GTP certification or equivalent (the shipment is on behalf of the said CSA-GTP certified operator). This is not the case of a farmer's service provision;
- **Transport / shipping** is an activity to be coupled with at least one other activity (collection, storage and / or marketing)

Similarly, all cereals, oilseeds and protein crops treated by the audited company **must** be included in the scope of certification.

In addition, an operator carrying out only a transport activity, without carrying out operations, collection, storage or marketing cannot claim CSA-GTP certification.

2. Middlings

The inclusion in the scope of certification of middlings¹ remains at the discretion of the audited company. If included in the scope of certification, the "middlings" must be clearly indicated as part of the scope certified on the certificate.

3. **Simple mechanical operations on cereals, oil-protein seeds and "products"** (entry into force on January 1, 2020)

The integration of these operations into the scope can only be done under the following conditions:

¹The term "middlings" (formerly known as "cereal issues") should be considered as the residue of screening of cereal grains (see Regulation 68/2013)

- This is a related activity, the main activity of the operator remaining the collection, storage and marketing of grain;
- These operations are only carried out on cereals, oilseeds, protein crops and "products";
- These operations are carried out only on a single raw material listed above (cereals, oil-protein seeds and "products")
- Certification can only be done on the operations listed below (in accordance with regulation 2017/1017):
 - Crushing: Reduction of particle size using a crusher
 - Decortication: Complete or partial removal of outer layers from grains, seeds, fruits, nuts and others
 - Dehulling/dehusking: Removal of the outer skins of beans, grains and seeds usually by physical means
 - Granulation: Treatment of feed materials to obtain a specific particle size and consistency
 - Rolling: Reduction of particle size by passing the material, e.g. grains, between pairs of roller
 - Extrusion: Thermal process during which the product's internal water content is rapidly evaporated leading to the breaking-down of the product, combined with specific shaping of the product by passing through a defined orifice.

4. Optionally, the activities of purchasing, storing and marketing raw materials and agricultural products that have undergone simple mechanical operations for human consumption and / or the activities of purchasing, storage and marketing. raw materials and compound feed for animal feed (entry into force on July 1, 2020)

As soon as this option is selected, no exclusion of the activities concerned is possible.

The integration of these operations into the scope can only be done if it is a related operation, the main activity of the operator remaining the collection, storage and marketing of grain.

3.2 Covered sites

The scope of certification must cover all of the operator's sites.

The certification scope of the "GMO module" covers only the sites and products previously declared by the operator to its certification body.

4 - TECHNICAL CERTIFICATION COMMITTEE

A technical committee for certification is established.

4.1 Missions

The main tasks of the technical committee are:

- The proposal of developments of the code and the certification rules.
- The request for any recourse of an operator or a certification body on an interpretation of the code

- The establishment of technical positions facilitating the interpretation of the code

4.2 Composition

The technical committee is made up of the 3 federations that own the CSA-GTP and in particular:

- A representative of Coop de France - Métiers du grain
- A representative of FNA
- A representative of SYNACOMEX
- AND members of these three federations

It meets at least once a year.

5 - CERTIFICATION STEERING COMMITTEE

A steering committee for certification is set up.

5.1 Missions

The main tasks of the steering committee are:

- Validation of developments of the code, proposed by the technical committee,
- Validation of technical interpretations.

5.2 Composition

The steering committee is composed of:

- 1 representative of the Syndicat de Paris,
- 1 representative of Coop de France - Métiers du grain,
- 1 representative of the FNA,
- 1 representative of SYNACOMEX,
- 6 representatives of the collection operators (2 CDF members - Métiers du grain, 2 FNA members, 2 SYNACOMEX members),
- 1 representative of the millers,
- 1 representative of corn semolina millers,
- 1 representative of malters,
- 1 representative of the starch producers,
- 1 representative of feed manufacturers,
- 1 representative of crushers.

The appointment of members is made for a period of 3 years by the professional organisations concerned.

In case of unavailability, the members of the steering committee have the option to be replaced by a substitute named in the same conditions.

The steering committee may be open to other structures as a guest depending on the topics of discussion.

5.3 Periodicity of meetings

The steering committee meets at least once a year. In case of validation of a technical interpretation of the code, it will be published on the Incograin website.

5.4 Impartiality and confidentiality

The members of the steering committee are subject to an obligation of impartiality and confidentiality. In order to comply with the clauses, a "**commitment of impartiality and confidentiality**"; is signed by each of them (taking at least the elements of Appendix 1).

When the steering committee examines the report concerning one of its members representing an operator, the latter must withdraw from the meeting during the period of consideration of the report and the deliberation.

6 - REFERENCING OF CERTIFICATION BODIES

Any certification body (CB) operating under ISO 17021-1 or ISO 17065 accreditation may be referenced, provided it undertakes to have at least two qualified auditors or to be bound by contract to two qualified auditors (Article 7.1).

Initial requests for referencing must be addressed to the Syndicat de Paris. This request includes:

- The current ISO 17021-1 or ISO 17065 certificate,
- The list of prospective auditors to be qualified, employees and / or subcontractors.

The referencing will only be effective once both auditors are actually qualified.

Requests for renewal of referencing must be sent to the Paris grain trade association, once a year, before 30 May of each year. This request includes:

- The current ISO 17021-1 or ISO 17065 certificate,
- The list of qualified auditors,
- The list of audits carried out by the qualified auditor in the year mentioning the names of the audited companies and the dates of the audits.

For each referenced certification body, an agreement between the owners of the CSA-GTP and the CB is signed. This agreement mentions the rights and duties of each party.²

The certification bodies referenced for the CSA-GTP charter are, in fact, referenced for the "GMO module"

6.1 List of authorised certifying bodies

The list of accredited certification bodies is published on the Incograin website (<https://www.incograin.com/>) and updated by the Syndicat de Paris.

6.2. Monitoring of certification bodies

The owners of the CSA-GTP certification reserve the right to visit the certification bodies' headquarters to check whether a certification body meets the requirements of the audit and certification rules.

This monitoring is done through an audit grid and a system of minor, major, and critical deviations from the requirements of the grid.

Owners also have the right to accompany each auditor in an audit to verify on site the method of auditing certification bodies or an auditor and to verify that the code are correctly applied.

²These agreements will be drafted and implemented by 1 July 2018
Certification and audit regulatory

6.3. Sanctions for the certification body

On the basis of the audit reports from the certification bodies provided for in point 6.2., The CSA-GTP decides on the appropriate measures or sanctions addressed to the certification bodies in the event of non-compliance observed with regard to compliance with the regulations.

As an indication, the list below gives some examples of situations that could reach this type of decision:

- a. Failure to comply with the expected qualification of auditors
- b. Failure to respect audit frequencies
- c. Abusive issuance of certificates
- d. Failure to set up an additional audit by the operator in the event that the measures enabling the non-compliance to be lifted are not implemented within a maximum period of 3 months
- e. Bringing the CSA-GTP into disrepute
- f. Withdrawal, suspension or termination of their accreditation
- g. Proof of negligence or any other failure to apply the requirements of this Regulation

The sanctions that can be applied are as follows:

- Warning with a deadline allowing the CB to remedy the deficiencies in a verifiable manner. During a period of 12 months and for an identical NC, the warning can only be used once as a sanction
- Suspension of recognition until the deficiencies are demonstrably remedied, such that, during the suspension, the CB is no longer able to sign new contracts, perform audits, to issue new CSA-GTP certificates. All audits scheduled during the period of suspension of recognition must be carried out by another approved CB. The suspended CB is responsible for organizing this audit, in consultation with the company.
- Do not extend the agreement with the CB, so that it cannot subsequently be able to carry out its activities
- Break the agreement with the CB with a short notice period, so that it can no longer be able to perform its CSA-GTP certification activities
- Break the agreement with the CB with immediate effect, so that it immediately stops exercising its CSA-GTP certification activities

For each of these sanctions, the CSA-GTP may decide to communicate its decision through the website and / or in another way.

6.4. Changes within a Certification Body

The certification body must inform the owners of the CSA-GTP certification, at least 3 months in advance (or as soon as they are aware for unforeseen events), of any modification of its organisation that could have an impact on CSA-GTP certification and in particular:

- Stopping the qualification of an auditor (retirement, resignation, breach of contract, etc.),
- The modification of the legal status of the CB,
- The loss of accreditation of the CB.

6.5. Stopping certification by a Certification Body

When a CB wishes to stop its certification activity for the CSA-GTP, it is obliged to inform the owners of the CSA-GTP certification at least 3 months in advance by registered mail with acknowledgement of receipt sent to the Syndicat de Paris. It must also inform the operators with whom it is under contract as part of CSA-GTP certification. The operator will choose a new CB from the list of certification bodies authorised to perform CSA-GTP audits, available on the Incograin website.

The CB must provide for the transfer of the files of operators in the process of being certified to the certification body authorised and chosen by the operator, at least 3 months before the next audit deadline for each operator concerned.

6.6. Subcontracting an audit

A CB may subcontract an audit to another CB under the following conditions:

- The CB is also authorised,
- The mandated auditor is qualified,
- The customer is informed in advance that the audit will be subcontracted, giving the name of the subcontractor and the name of the auditor appointed.

6.7 Harmonisation meetings

Annually, the owners of the CSA-GTP organise a harmonisation meeting with the certifying bodies. These meetings aim to exchange between CB and owners to review the past year in terms of audits (number, non-conformities encountered, etc.), to answer technical positions or other questions that the CB may wish to raise. This list is not exhaustive, the agenda will be circulated before each meeting.

7 - QUALIFICATION OF AUDITORS

Auditors are qualified or re-qualified with each new version of the certification code. With each evolution of the code, the qualification or re-qualification of the auditors is reviewed according to the qualification/re-qualification system (see 7.2).

We call:

- **Initial qualification:** the qualification awarded to a new auditor or auditor who's previous qualification has lapsed,
- **Temporary qualification:** the qualification awarded to a new auditor or auditor who's previous qualification has lapsed, subject to taking part in a training course,
- **Re-qualification:** the qualification assigned to previously qualified auditors for the previous version of the current code.

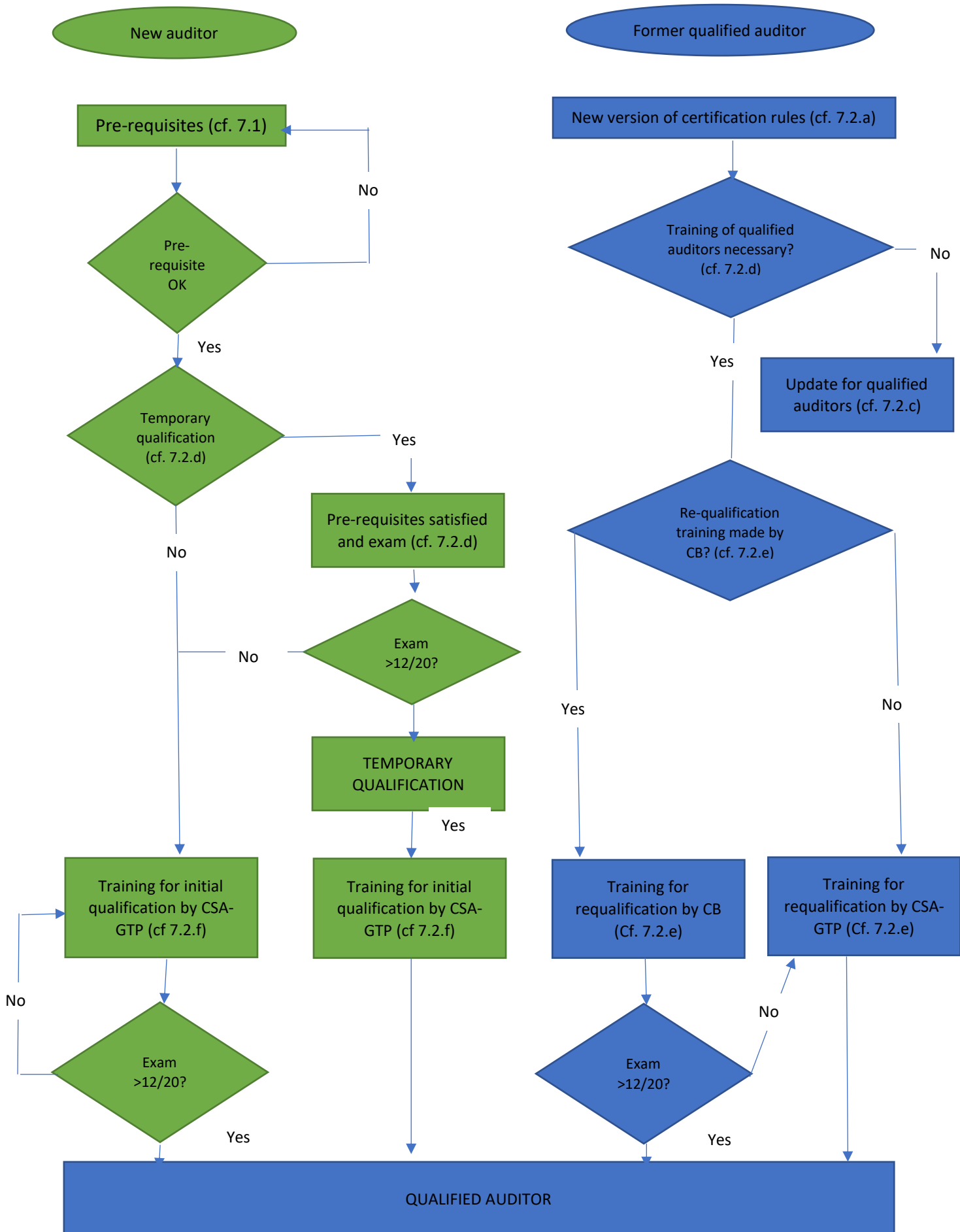
7.1 Prerequisites for qualification of auditors

Only certified auditors of an ISO 17021-1 or ISO 17065 accredited certifying body, or contractually bound by an ISO 17021-1 or ISO 17065 accredited certifying body **AND** that can:

- Justify knowledge of the cereal sectors
- Justify the participation in at least 3 days of audit in a storage company, two different storage companies minimum. These audits must be on-site audits and not documentary audits,
- Justify training in the field of quality management **and** HACCP **OR** a minimum of 2 years of experience in a position related to these areas,
- Justify audit training,
- Justify specific CSA-GTP training for collecting, storing, marketing and transporting grains, oilseeds and protein crops, and obtaining a score of at least 12/20,
- Undertake an obligation of confidentiality and impartiality (reproducing at least the elements of Appendix 2).

These prerequisites must be communicated to the owners of CSA-GTP certification via the e-mail address (secretariat@csa-gtp.com). When the prerequisites are met, the qualification of the new auditor can be considered

7.2 Qualification of new auditors and re-qualification of former auditors



The qualification of the new auditors systematically requires training that is carried out according to the following provisions - the diagram refers to the detail of the described provisions (see a to f)

A previously qualified auditor who fails to meet requalification deadlines will be considered a "**new auditor**" and will enter the initial qualification scheme. Through this system, the defined qualification deadlines must be respected provided that the prior qualification is lost.

a) New version of the certification code

With each new version of the code, the qualification of auditors is reviewed.

b) Training of previously qualified auditors

Depending on evolution of the code, the owners of the CSA decide on the need for requalification of previously qualified auditors.

c) Upgrade r-1 auditors (previously qualified)

The owners of the CSA-GTP certification set up the upgrade provisions of previously qualified auditors, following the evolutions of the code.

The upgrade must be done before the effective date of the new code. A previously qualified auditor will not be able to benefit from this device after the date of entry into force of the new code. They will therefore lose the priority of its qualification and will have to re-qualify themselves by complying with the initial qualification provisions of new auditors.

The upgrade can be carried out remotely by means such as: E-learning,

- Webinar
- Transmission of documentary media

The upgrade is accompanied by evidence of participation in distance learning.

The upgrade can be accompanied by a case study. In this case, the defined deadlines must be respected subject to losing the priority of the qualification.

E-learning training must be followed by all CSA-GTP qualified auditors wishing to carry out audits on the "GMO module" and on the activities of purchasing, storing and marketing raw materials and agricultural products that have undergone mechanical operations. simple products intended for human consumption and / or the purchasing, storage and marketing activities of raw materials and compound feed for animal feed.

d) Temporary qualification of new auditors

Subject to meeting the prerequisites (see 7.1), a new auditor may benefit from a temporary qualification. A CB wishing to add a new auditor to the list of qualified auditors must apply to the CSA-GTP Secretariat (secretariat@csa-gtp.com).

Temporary qualification may be granted to a new auditor pending a training session subject to the following conditions:

- Accompany, as an observer, a qualified auditor in at least one CSA-GTP audit
- Perform, in conjunction with a qualified auditor, at least one CSA-GTP audit
- Participate in a CSA-GTP exam session (see 7.3) and obtain a minimum grade of 12/20. If the auditor does not obtain the required mark, they cannot benefit a second time from the temporary qualification scheme
- Participate in the first proposed CSA-GTP training session. If the auditor has already passed the temporary qualification examination, they will be exempted from the exam at this training session.

The temporary qualification is valid until the registration of the auditor at the first training session proposed by the owners of the CSA-GTP and at most for a period of 12 months. The owners of the CSA-GTP reserve the right to request an audit report.

e) Requalification training for previously qualified auditors

The content of the requalification training for auditors is defined by the owners of the CSA-GTP certification in relation to the guideline requirements. The training programme is established according to the evolutions of the code.

The requalification training can be carried out:

- By a training body called "CSA-GTP", that is to say selected and validated by the owners of CSA-GTP certification. This training is qualifying and does not require participation in an exam. By the certification body on which the auditor depends, provided that:
 - o The training program they plan to deploy covers the requirements of the CSA-GTP and is subject to prior validation by the owners of the GTP-CSA;
 - o The trained auditor must participate in a CSA-GTP exam session (see 7.3) and obtain a minimum grade of 12/20;
 - o If the auditor does not obtain a grade of > 12, they must participate in a qualifying training conducted by a training organisation called "CSA-GTP".

f) Training for initial qualification of new auditors

The training content for the initial qualification of the auditors is defined by the owners of the CSA-GTP in accordance with the requirements of the code. The training programme is established with each new version of the code and will integrate the "GMO module" and activities of purchasing, storage and marketing of raw materials and agricultural products having undergone simple mechanical operations intended for human consumption and / or the activities of purchasing, storage and marketing of raw materials and compound feed for animal feed. from July 20, 2020.

The training is carried out essentially by an organisation called "CSA-GTP", selected and validated by the owners of the CSA-GTP.

- For auditors with a valid temporary qualification (see d.), this training is qualifying and does not require sitting another examination.
- For auditors who do not have a temporary qualification, this training must be accompanied by an examination (see 7.3). The auditor is qualified if they pass the examination.

The qualification is maintained under the following conditions:

- Justification of running at least 2 audits per calendar year,
- Participation in any training sessions decided by the certification steering committee.

The auditor cannot perform more than two successive cycles (6 years) with the same operator.

Qualification and its maintenance are decided by the owners of the CSA-GTP certification.

7.3 Monitoring the qualification of auditors

To assess the qualification of the auditors in a random and representative manner (of the number of certification / CB files), the owners of the CSA GTP code set up (taking into account the impartiality of

the members of the technical committee) paired audits (CSA GTP Owners / Technical Committee) at the headquarters of the CB.

A notice period of 15 days will be allowed to inform the CB.

7.4 Examination conditions

7.4.1. Principles

a. Overview

The entire examination procedure (including prior training, admission requirements, operation) is subject to the principles:

- Of transparency,
- Of fairness,
- Of non-discrimination,
- Of impartiality.

Exceptions to this procedure may only be authorised by the technical committee on the justified request of a participant and after the latter has been informed. The technical committee expressly determines the period of validity of the exemptions granted. Waivers granted by the technical committee shall be notified to the participant in writing and / or electronically.

b. Confidentiality

The owners of the CSA-GTP guarantee, at all levels of their organisation, the confidentiality of the information obtained during the examinations. Unless otherwise specified in the document, no confidential information about a participant in the examination may be disclosed to a third party without the written consent of the participant's employer.

Information where identification of participants is impossible (e.g. general success statistics per session and / or by employer) may, without prior authorisation, be communicated to third parties and possibly published by owners of the CSA-GTP (e.g. report meeting).

Any complaint communicated to the owners or to the technical committee of the CSA-GTP is handled in a confidential way and will preserve the anonymity of the sources.

7.4.2. Holding exams

The examinations are organised at a frequency determined by the CSA-GTP Technical Committee, at least once per calendar year, and consist of two sessions (first session, then second session or remedial session). The CSA GTP owners define the terms and conditions of the examinations as well as the content and the marking methods.

CSA-GTP organises at least one examination per calendar year to the exclusive destination of the auditors. The subjects covered by an examination are defined in the training programme published by the owners of CSA-GTP.

Auditors meeting the requirements described in paragraph 7.1 may be candidates.

The programme on which the multiple choice examinations and the case studies proposed during the examination are to be communicated by the training organisation on the day of the auditor's

registration for the exam. Examination dates are communicated by the training organisation at least 6 weeks in advance by e-mail.

Registration for the examination is made according to the indications on the registration form which is available on the Incograin website or the website of the organisation mandated by the owners to carry out these trainings. The cost of participation is indicated on the registration form.

A participant who has not satisfied the registration requirements can be declared inadmissible to the exam. The inadmissibility of the application for participation is preferably noted before the start of the examination.

1. The qualifying examination takes place at the end of the training, it takes place over a period of 2 hours and progresses as follows:

Part 1: No document admitted. MCQ of 50 questions that cover:

- Knowledge of trades (collection, storage, marketing and transportation of cereals, oilseeds and protein crops). Auditors by their initial qualification must know the different activities. These points will not be addressed explicitly during training;
- Knowledge of HACCP. These points will not be explicitly addressed during training (initial qualification of the auditors);
- Mastery of audit These points will not be explicitly addressed during training (initial qualification of the auditors);
- Mastery of the code These points will be addressed explicitly during training;

Part 2: With documents, case studies:

Three case studies will be presented on the examination sheet. For each of them, the candidate will have to decide on the conformity of the case, if non-compliant, assess the level of seriousness, determine the requirement concerned, make a statement for the closing meeting, propose additional investigations if necessary.

The participant can use the documentation provided during training.

2. The participant signs an attendance sheet during the examination.

3. Unless otherwise stated, the evaluation grid is as follows:

MCQ: 10 questions on knowledge of the industry, 10 questions on the business of collecting, storing, marketing and transporting grain, 10 questions on HACCP, 10 questions on the audit, 10 questions on the CSA-GTP code.

	CORRECT ANSWER	NO ANSWER	WRONG ANSWER
MCQ	+1	0	-1

The score on the MCQ is reduced to 20.

Case study: To decide on the conformity of the case, to evaluate its gravity / To determine the requirement concerned / To declare the statement / To determine any possible additional investigations.

Marking is as follows:

Satisfactory analysis	5 points
Partially compliant analysis (e.g. the description of the statement is not completely in line with the situation described but its classification is satisfactory)	3 points
Partially non-compliant assessment (e.g. identified as minor, when major or vice versa)	2 points
Non-compliant analysis (e.g.: identified as compliant or improvement axis while major non-compliant ...)	0 point

The score for case studies is reduced to 20.

The final score is the average over 20.

4. *Any cheating or plagiarism results in a score of 0 for the entire exam. The participant is notified as soon as cheating or plagiarism is discovered.*

If applicable, the participant must prove their identity at the start of the examinations. This identification takes place by means of the presentation of one of the following official documents: passport, identity card.

The precise location of training and examination are communicated to the participants at their registration. The participant strictly observes the location and the examination schedule.

There cannot be, between a participant and the examiner, any relationship such as spouse, nor any family relationship up to, and including, the fourth degree, or any relationship of interest. The topics are determined by the panel in conditions ensuring their confidentiality.

Copies taken at the end of the examinations are immediately anonymised by affixing a serial number. The list showing the correspondence between the serial numbers and the names of the candidates is established and kept by one person.

7.5. Copy corrections

Examinations are corrected within a maximum of 15 days from the date of the exam. The correction of the copies is done by the corrector who receives the copies bearing only the serial number. These people ensure the marking of the test, making sure of the homogeneity of their marks by carrying out a double correction of the copies.

The marked copies are given to the person responsible for anonymity, who transfers the marks into a table to assign the marks to the candidates.

By subject examined, the different scores obtained for each question are added together.

The evaluation of the results is carried out as follows:

- Score of 12/20 or over: pass the knowledge validation test.
- Auditors with a score between 10 and 12 will not have to repeat the initial training. The candidate will only be allowed to attend the catch-up session once. In the event of another failure in the catch-up session, regardless of the mark obtained, the candidate will have to participate in a new training session.
- Auditors with a score of less than 10 will be required to participate in all of the training including the qualifying examination.

7.6. Communication of results

The results for the examination of each auditor are communicated by e-mail to the referent appointed by the Certification Body.

The deadline for appeal is 30 days from the date of receipt of the results by the certifying body. Any appeal gives rise to a new marking of the applicant's copy under the same conditions of anonymization and proclamation of the results.

Any candidate may have access to their copy. Copies are available on site, no less than four weeks before passing the exam again.

8 - AUDIT METHODOLOGY

The audit cycle is three years. Audits must be performed by referenced certifying bodies and qualified auditors.

8.1 Different types of audits

- Initial certification audit: first audit performed by an operator according to the CSA-GTP audit code.
- Follow-up audit: audit performed two years after a certification audit.
- Renewal audit: audit carried out for the renewal of the certification of an operator.
- Complementary audit:
 - o audit of the "GMO module" carried out outside the CSA-GTP certification cycle
 - o audit of the purchasing, storage and marketing activities of raw materials and agricultural products that have undergone simple mechanical operations intended for human consumption and / or the purchasing, storage and marketing activities of raw materials and compound feed for animal feed produced outside the CSA-GTP certification cycle

In the event of a change of CB during a triennial cycle or between two successive cycles, the former CB must transmit all of its audit file (all documents including the audit report, the relevant elements open deviations, etc.) to the future OC chosen by the operator in the list of certifying bodies authorised to carry out CSA-GTP audits and available on the Incograin site.

8.2 Audit of the operator's sites

8.2.1 Duration of the audit

The audit includes a study of the organisation system and an audit of storage sites. The audit duration includes the preparation time of the audit and the writing of the report.

The audit duration of the **organisation system** depends on the situation of the operator:

Operator certified on the basis of certification equivalent to CSA-GTP certification or engaged in an ISO 9001 (at least for the same fields and perimeter as CSA-GTP) or ISO 22000		Operator not certified on the basis of code equivalent to CSA-GTP certification or not engaged in an ISO 9001 or ISO 22000
Concurrent Audits	Non-concurrent audits	
The duration of the audit is defined according to ISO 9001 or 22000	<u>Certification or renewal audit</u> : 0.75 days <u>Follow-up audit</u> : 0.5 days	<u>Certification audit or renewal</u> 1 days <u>Follow-up audit</u> : 0.5 days

In the case of CSA-GTP audits carried out **concurrently** for two different companies (legal entities) but having:

- **The same directors,**
- **The same quality manager,**
- **The same quality system**

The audit time of the organisation system can be reduced to 0.75 days / legal entity instead of 1d / legal entity (default rule).

The duration of a **site** audit depends on its size and complexity:

- Main sites: 0.5 days per site
- Secondary sites: 0.25 days per site
- Tertiary sites: 0.25 days per site

The distinction between main, secondary and tertiary sites is proposed by the operator and validated by the certification body during the audit. An operator can only define secondary and tertiary sites within its scope of certification. A tertiary site must not have any grain handling facilities (e.g. cleaning, drying, sizing, etc.) A site without a grain handling facility may still be classified as primary or secondary by the operator on the basis of other criteria (e.g. tonnage, etc.).

In the event of certification on simple mechanical operations or on the trade / storage / marketing and transport of feed materials or compound feed, the sites on which these activities are carried out should be preferably chosen.

The audit duration for the verification of the "GMO module" coupled with the CSA-GTP audits is 0.25 days per operator certified CSA-GTP

Duration of additional audits:

The additional audit period of the purchasing, storage and marketing activities of raw materials and agricultural products that have undergone simple mechanical operations intended for human consumption and / or the purchasing, storage and marketing of raw materials and compound feeds for animal feed is 0.5 days per CSA-GTP certified operator

The additional audit period of the "GMO module" is 0.5 days per operator certified CSA-GTP.

Regarding the management of non-conformities, the certification body must:

- Ensure that the corrective actions planned internally by the operator are implemented and effective
- Trigger an additional audit of the operator in the event that the measures enabling the non-compliance to be lifted are not implemented within a maximum period of 3 months from the result of the analysis, if no audit has been carried out. is initially planned before this deadline.

8.2.2 Number of sites to be audited

From January 1st, 2019

In the case of an **initial certification audit**, the number of sites to be audited is:

- $0,8\sqrt{x}$, rounded up to the nearest whole number

In the case of a **follow-up audit**, the number of sites to be audited is:

- $0,5\sqrt{x}$, rounded up to the nearest whole number.

In the case of a **renewal audit**, the number of sites to be audited is:

- $0,6\sqrt{x}$, rounded up to the nearest whole number.

x representing all the sites of the operator.

In the event of purchase / merger of companies and in particular of adding sites to the scope of certification (see paragraph 12 of this audit and certification regulation), the number of sites to be audited among these new sites follows the previously established rules for a certification audit.

Example:

YEAR	NUMBER OF SITES INCLUDED IN THE PERIMETER	NUMBER OF SITES TO AUDIT
N (INITIAL AUDIT)		$0.8\sqrt{x}$
N+1 (FOLLOW-UP 1)	+	$0,5\sqrt{x} + 0,8\sqrt{x}$
N+2 (FOLLOW-UP 2)	++	$0.5\sqrt{x} + 0.8\sqrt{x}$
N +3 (RENEWAL)	++	$0.6\sqrt{x} + 0.8\sqrt{x}$

In the end, the total audit duration should be rounded up to the next half day.

8.2.3 Choice of audited sites

The list of sites audited is defined by the certifying body, in agreement with the operator and is communicated to the operator two weeks before the opening date of the audits.

Special case of tertiary sites: The auditor can only audit a maximum of 3 tertiary sites over the 3-year certification period. Nevertheless, since these sites are part of the operator's scope of certification, the operator must include them in its internal audit programme (like the main and secondary sites).

8.3. Special case for audits of Chapter 8 of the CSA-GTP code relating to "farm direct delivery" - Applicable from 1 July 2018

The auditor annually verifies the control system put in place by the operator to ensure "farm direct delivery" as part of CSA-GTP certification.

8.3.1. Number of farmer files to inspect

The auditor will first check a number of farm records including:

- The inventory sheet of the storage farmer's installations and the storage conditions of the grain (see Appendix 4 of the CSA-GTP certification code)
- The commitment of the farmer to respect the good practices of appendix 3 of the CSA-GTP certification code
- The report of the internal audit carried out by the operator on-site at the farm

The number of farm records audited by the auditor is determined as follows:

Number of farmers included in the farmer list <i>(see certification code 8.a.1)</i>	Number of farm records to be audited by the auditor
1->2	1
3->6	2
7->12	3
13->20	4
21->24	5
25->50	7
51->74	10
75->100	12
>100	15

Farmer files to be checked are selected by the auditor from the farm sites verified internally by the operator so that they can verify a certain number of internal audit reports.

In addition to these farmer files, the auditor will check the requirements of the CSAGTP code applicable to the operator and defined in paragraph 8 of the CSA-GTP code.

The auditor also reserves the right to inspect a number of contracts to verify that no goods have been shipped to a customer of the operator requiring CSA-GTP certification from a farmer who is not on its list of farmers *(see requirement 8.a.1 of the certification code)*

8.3.2. Duration of audit

The audit duration depends on the number of farmers included in the list of farmers (*see 8.a.1 of the certification code*):

- 0.25 day up to 100 farmers
- 0.5 days beyond 100 farmers

This is in addition to the planned audit duration for CSA-GTP certification.

8.4 audit report

Following the completion of the audit, and no later than 15 days after the closing date of the audit, the auditor shall draw up an audit report. This report provides the necessary details of the audit so that the CB can decide whether to award, maintain or refuse certification. The report mentions in particular the differences as well as the factual elements concerning the HACCP and the control of the security of the grain, the management of traceability, the monitoring plan, the state of the infrastructures, the management of the non-conformities and customer complaints. It decides on the relevance and effectiveness of the operator's organisation.

The operator shall, **within a maximum period of one month**, as from the date of receipt of the audit report, transmit to the auditor the corrective actions that it intends to put in place to remove any difference other than critical (see 8.6), specifying for each action the deadline for implementation and the person responsible for carrying out this action. After receiving the corrective actions, the auditor will close their report and write their comments to the attention of the certification board of the CB. The certification commission of the CB decides on the attribution, maintenance or refusal of certification within a **maximum period of 6 weeks** as from the date of the reception of the corrective actions (or, in case of non-reception of corrective actions, from the due date of receipt).

As soon as it is issued, the CB sends the certificate or the follow-up certificate following the follow-up audits to the Syndicat de Paris.

8.5 Critical deviation evaluation system

The requirements marked with an asterisk have a direct impact on product hygiene and the reliability of the health quality control system in place. Failure to comply is a **critical deviation**.

In the context of a **certification or renewal audit**, a critical deviation leads to the refusal of the certificate. The new certificate can only be issued after the elimination of discrepancies that will be made through the completion of an additional audit, on-site or documentary, according to the rules of the CB and the nature of the non-conformity.

In the context of a **follow-up audit**, a critical deviation leads to the immediate suspension of the certificate. The CB is obliged to inform the Paris Union immediately, in writing and by ensuring the receipt of the information, so that the company concerned is no longer on the list of certified companies. The reinstatement of the certificate can only be done after the elimination of the discrepancies that will be effected through the completion of an additional audit, on-site or documentary, according to the rules of the CB and the nature of the non-conformity.

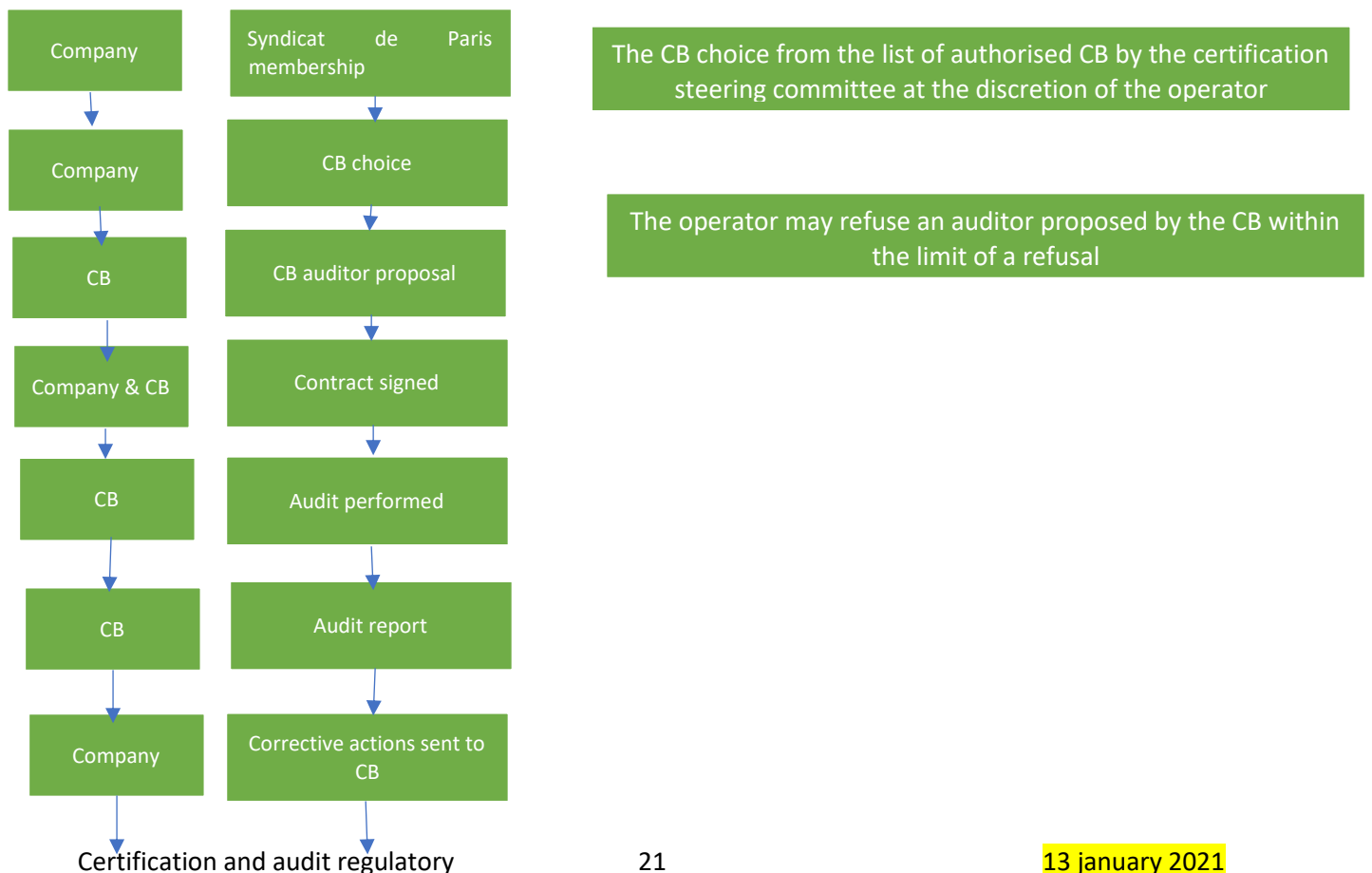
If a critical deviation is identified, the audit must nevertheless be completed.

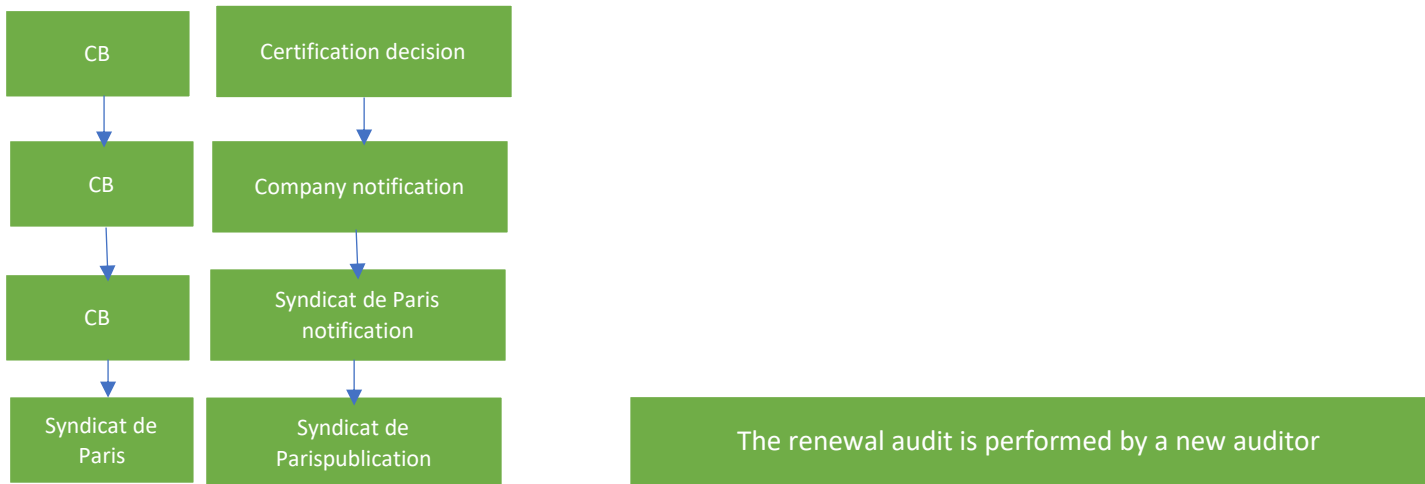
8.6 Follow-up on the certification files

The CB shall promptly notify the Syndicat de Paris of changes relating to the certification of the operator in the following cases:

- Withdrawal OR cancellation of certification in progress or at the end of the certification cycle
- Updating certificates in case of perimeter change or change of certification version

9 - PROCESS FOR PROCESSING THE CERTIFICATION REQUEST





* as part of a first membership.

10 - CONDITIONS OF Notification

Certification is issued by the certification body in accordance with the audit and certification rules.

11 - NOTIFICATION - CERTIFICATE UPDATE

The certificate issued by the CB must include the following elements:

- CB contact information,
- Contact information of the certified operator,
- Date of audit,
- Audit code,
- Scope of certification, namely: activities and sites covered by the certification,
- Deadline for validity of the certificate.

(See template in Appendix 3)

The certificate is sent to the operator by the CB. The CB immediately sends a complete copy of the certificate, including appendices, to the Syndicat de Paris by e-mail (secretariat@csa-gtp.com).

Upon receipt of the elements transmitted by the CB, the Syndicat de Paris updates the list of certified companies on its website (<http://www.incograin.com>).

All the information mentioned on the certificate and its appendices can be consulted online. Follow-up audits give rise to the issue of follow-up certificates (see Appendix 4), which must be sent under the same conditions to the Syndicat de Paris. It is not necessary to send a certificate of renewal in addition to the renewal of the certificate.

In case of change of scope, the certificate and / or its appendices must be renewed.

12. EVOLUTION OF THE CERTIFICATE IN THE CASE OF MERGER OF COMPANIES

In all cases, the certified operators involved in a merger must ask their CB (s) for a preliminary assessment of their situation.

1 / in case of merger / absorption (A absorbs B)

- A is certified, B is not: A must integrate B's sites into its certification scope. Refer to the scope extension procedures (section 8.2.2 of the certification regulation)
- A is not certified, B is: if B wants to keep its certification, A must be certified.
- A and B are certified:
 - Stay on the cycle of A (absorbing unit),
 - Or ○ Maintain two certificates corresponding to the perimeters of the two merging companies, for a period limited to 12 months from the date of merger, which gives companies sufficient leeway to concretely implement common procedures, then a single certificate.

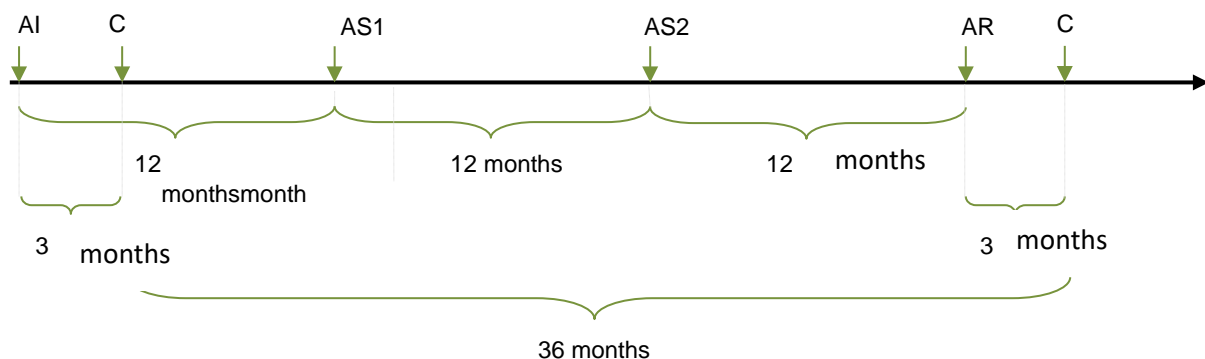
2 / previous creation of an absorbing company (creation of C which absorbs A and B)

- New certificate for C (initial audit),
- Or
- Maintain two certificates corresponding to the perimeters of the two merging companies, for a limited period of 12 months from the date of merger, which gives companies sufficient leeway to concretely implement common procedures then new certificate (initial audit).

13 - VALIDITY OF CERTIFICATION

Certification is valid for 3 years, subject to the completion of the two annual follow-up audits. The last day of the audit serves as a reference date for the determination of the target dates for follow-up audit 1, follow-up 2 and renewal.

Follow-up audits should be conducted on the anniversary date of the initial audit within approximately 2 months.



AI: Initial audit

C: Issue of certificate

AS1 and AS2: Follow-up audits 1 and 2

AR: Renewal audit

Example:

Initial audit	01/09/2017
Dates of validity of the certificate	From 01/12/2017 to 31/11/2020
Follow-up audit 1	Target date: 01/09/2018, between the 01/07/2018 and the 01/11/2018
Follow-up audit 2	Target date: 01/09/2019, between the 01/07/2019 and the 01/11/2019
Renewal audit	Target date the 01/09/2020
Date of validity of renewal certificate	From 01/12/2020 to 31/11/2023

The target date is an ideal date, but not a deadline.

The renewal audit must take place sufficiently early to allow the continuity of the certification and to have a renewal certificate from the expiry date of the previous certificate. It is necessary to take into account the response time of the operator to the non-conformities as well as the processing time of the CB to avoid any breach of certificate. In the event that the renewal decision is taken before the expiry date of the previous certificate, the date of the beginning of validity of the new certificate will be the date of the validity of the previous certificate +36 months.

In the event of a change in the version of the certification code, the audit cycle is assured in its continuity without the need to carry out a renewal audit. The CSA-GTP certificate is updated in accordance with the code version in force on the date of the audit.

14 - REMEDIES CONCERNING AN INTERPRETATION OF THE CODE

An operator may appeal a decision or sanction taken against it, following an interpretation of the code, in accordance with the CB's own remedy management system.

The appeal is sent first to the CB with a copy by registered letter with acknowledgement of receipt (LRAR) to the Certification Technical Committee (via the Syndicat de Paris, see Chapter 4: secretariat@csa-gtp.com)

In the event that the dispute concerning the interpretation of the code remains after this appeal made to the CB, an appeal may be sent by registered letter with acknowledgement of receipt to the technical certification committee (via the Syndicat de Paris, see chapter 4 secretariat@csa-gtp.com) which will review it within 2 months. The decision of the technical committee is binding on the operator and the CB.

Following this decision, "technical positions" may be issued by the technical committee for the benefit of all interested parties.

The owners of the CSA-GTP reserve the right to suspend or withdraw the certification of an operator in case of:

- Major non-compliance made known to the owners by a downstream customer
- Unfavourable behaviour calling into question the credibility of the code or the maintenance of the recognitions acquired.

The owners will send the operator a warning letter, which without a response within 1 month leads to a decision to suspend or immediately withdraw the certification.

Appendix 1: Confidentiality and impartiality commitment of the members of the steering committee

I, the undersigned, *name*, member of the Steering Committee of CSA-GTP certification

Acknowledge having read the CSA-GTP code certification rules and accept the terms

I undertake to:

- Perform my mission impartially,
- Respect the confidentiality of the files brought to my attention
- Withdraw from deliberations when the files processed are directly or indirectly related to my own business

Signed in

on the

Signature

Appendix 2: Confidentiality and impartiality commitment of auditors

CB Logo

I, the undersigned, *name of the auditor*,

- Acknowledge having read the CSA-GTP code certification rules and accept the terms

- Certify that I am not involved, directly or indirectly, in activities (training, advice) likely to influence my audit mission

- I undertake to:
 - Perform my audit mission impartially, ○ Respect the conditions of independence with regard to the audited companies and the cereals sector,
 - Respect the confidentiality of information collected during the audit.

Signed in

on the

Auditor's signature

This certificate certifies that the company

STORAGE ORGANISATION

Address

Was successfully audited on dd / mm / yyyy¹ by the CERTIFYING BODY based on CSA-GTP code version XXXX² and CSA-GTP audit regulations version XXXX³

Has been successfully audited on dd / mm / yyyy by the company ORGANISME CERTIFICATEUR according to the specifics of the CSA-GTP standard, "non GMO module", version XXXX.

Scope of certification:

○ Products covered⁵:

- ✦ Cereals
- ✦ Oilseed
- ✦ Protein
- ✦ Middlings

✦ ○ Activities covered⁷:

- ✦ Collection
- ✦ Storage
- ✦ Simple mechanical operations
- ✦ Marketing
- ✦ Transport / Shipping
- ✦ Farm direct shipping⁸
 - ✦ Purchase, storage and marketing of other raw materials and agricultural products that have undergone simple mechanical operations for human consumption
 - ✦ Purchase, storage and marketing of other raw materials and compound feeds for animal feed

This certificate is valid from dd / mm / yyyy⁴ to dd (-1) / mm / yyyy⁵ subject to the completion of annual follow-up audits.

1 indicate the end date of the audit = AI

2 indicate the version of the code valid on the date of the initial audit, or follow-up or renewal

3 indicate the version of the certification regulation valid at the date of the initial audit, or follow-up or renewal

4 indicate the date of issue of the certificate = C

5 indicate the expiry date of the certificate i.e. date of issue +3 years = C +3 years

APPENDIX to CSA-GTP certificate

List of sites included in the certification scope of the CSA-GTP repository

NAME	ADRESS	Collection, storage, trade, transport of grains	Simple mechanical operations	Trade, storage of feed materials and compound feed	Non GMO Module
Site 1	Adress 1	Yes/no	Yes/no If yes precision of the type of operation	Yes/no	Yes/no
Site 2	Adress 2				
...	...				

NB : the update of the certificates following the above model will be done on an ongoing basis, from January 2021

Appendix 4: Audit certificate template

This certificate guarantees that the company

STORAGE ORGANISATION

Address

Was successfully audited on dd / mm /yyyy¹ by the company CERTIFICATING BODY on the basis of CSA-GTP code version XXXX² and the CSA-GTP version XXXX³ audit and certification regulation, with the options:

Purchase, storage and marketing of other feed materials and agricultural products that have undergone simple mechanical operations for human consumption

Purchase, storage and marketing of other feed materials and compound feeds for animal feed

as part of the annual follow-up audit.

Has been successfully audited on dd / mm / yyyy by the ORGANISME CERTIFICATEUR company according to the specifics of the CSA-GTP standard, "non-GMO module", version XXXX, as part of the annual monitoring audit

1 indicate the end date of the audit = AI

2 indicate the version of the code valid on the date of the initial audit, or follow-up or renewal

3 indicate the version of the certification regulation valid at the date of the initial audit, or follow-up or renewal