

FOOD SAFETY CERTIFICATION PROCEDURES MANUAL

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PrimusGFS V2.1-2

Harmonized Food Safety Standard



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INTRODUCTION

Food Safety Certifiers (FSC) is a private company that provides 3rd party certification services to the PrimusGFS and the Harmonized Food Safety Standards. These are private standards that establish voluntary requirements for the certification of agricultural sector products. This Certification Procedures Manual, explains the process FSC uses to grant certification to applicants.

1 STANDARDS & SCOPE

1.1 FSC offers three different certification standards and applicants must choose which program they are seeing certification to based on individual buyer expectations.

<i>GFSI Level - ISO 17065 Accredited Programs</i>	
	<p>PrimusGFS – Developed by Azzule, a private company; this North American based food safety standard has been integrated with the Costco Addendum.</p> <p><u>Applicable Scopes:</u></p> <ul style="list-style-type: none"> • Ranch • Greenhouse • Harvest • Storage & Distribution Center • Cooling/Cold Storage • Packinghouse • Processing (minimal)
<i>Non-GFSI Level - Privately Licensed Programs</i>	
	<p>Harmonized Food Safety – Developed by United Fresh, a US trade association; this is our entry level food safety standard.</p> <p><u>Applicable Scopes:</u></p> <ul style="list-style-type: none"> • Ranch • Greenhouse • Harvest • Storage & Distribution Center • Cooling/Cold Storage • Packinghouse

1.2 For the purposes of categorizing applicants, the following certification scopes will be used:

Scope	Examples of product
<ul style="list-style-type: none"> • Ranch 	Fruits, vegetables, nuts, grains, etc. produced for human consumption grown in a field or orchard
<ul style="list-style-type: none"> • Greenhouse 	Fruits, vegetables, nuts, grains, etc. produced for human consumption grown indoors or as a covered crop, including hydroponically

<ul style="list-style-type: none"> • Harvest 	Audit for harvesting activities included with all ranch/greenhouse audits unless exclusion is requested. Audit of Harvest Crew only is also possible.
<ul style="list-style-type: none"> • Storage & Distribution Center 	Warehousing operation of raw agricultural products. including staging, storing, loading, repacking, transportation and other handling activity that does not significantly transform the product from its original harvested form
<ul style="list-style-type: none"> • Cooler/Cold Storage 	All examples included for a Storage & Distribution Center and additionally cooling and temperature control for temperature sensitive products
<ul style="list-style-type: none"> • Packinghouse 	All examples included for a Storage & Distribution Center, Cooler/Cold Storage and additionally cleaning, washing, rinsing, fluming, sorting, grading, trimming, bundling, hydro-cooling, waxing, drenching, packing and other handling activity that does not significantly transform the product from its original harvested form
<ul style="list-style-type: none"> • Processing 	<p>Production of <u>plant products</u> (including fruits, vegetables, nuts, grains, etc.) including washing, slicing, dicing, cutting, shredding, peeling, grading, pasteurization, cooking, chilling, juicing, pressing, freezing, packing in modified atmosphere, packing in vacuum packing, and any other activity that significantly transforms the product from its original whole state</p> <p>Production of <u>plant products with ingredients of animal origin</u> (ready to eat salads with grilled chicken or other meat, frozen foods with both plant and animal ingredients, etc.) mixing, cooking, chilling, freezing, packing in modified atmosphere, packing in vacuum packing</p> <p>Production of <u>food products from agricultural sources that are stored and sold at ambient temperature</u> *Limited to agricultural products only including drying, roasting, salting, pressing, milling, etc.</p>

2 LEGAL REQUIREMENTS

2.1 Applicant organizations must be a legal entity with direct control over all sites and products listed on the application. Applicant organizations seeking certification for multiple legal entities/operations under its direct control (i.e. farm management company) may be requested to provide copies of legal documents (i.e. Memo of Understanding, Contract Agreements, etc.) that outline its legal responsibility for the production of all products seeking certification and sold by the farming operation.

3 APPLICATION

3.1 To request certification, please contact info@fscert.com. FSC will provide each applicant with an application package including the following:

- Applicant Information Form or Azzule Database Login (Application accessible online);
- FSC Certification Agreement;
- Applicable Standards Checklist (as a reference to prepare for the audit)
- PrimusGFS Sublicense Agreement (as applicable);
- Estimate.

3.2 To initiate the certification process; applicants must return the completed application package along with a paid deposit on certification as indicated on the Estimate. The remainder of the balance will be final invoiced after the site evaluation has been completed and must be paid in full prior to receiving certification.

4 APPLICATION REVIEW

4.1 ASSIGNMENT

Applicants will be assigned to a Client Representative who is responsible for all communications between FSC and the applicant as well as monitoring the status of individual applicants to ensure a smooth certification process. Customer service is a top priority at FSC and all questions and concerns will be handled in an efficient manner by the assigned Client Representative.

4.2 REVIEW

4.2.1 All applications will be processed within 21 days (or 7 days for expedited services) of receipt of the complete application and paid deposit. Processing includes application review, database registration (see section 5), and collection of supporting documentation and/or missing information as needed.

4.2.2 The Client Representative will contact the applicant and answer any questions to ensure that any known difference in understanding between FSC and the applicant is resolved, including agreement regarding standards, scopes, sites, products, audit documents, etc. The Client Representative will confirm the applicant has prepared the necessary means to perform all evaluation activities, including a risk assessment, food safety plan, internal audit and preferably at least 3 months of records. Applicants may be asked for additional documentation before moving forward with certification.

5 REGISTRATION (PRIMUSGFS ONLY)

5.1 Database registration is required for the PrimusGFS program; the Harmonized Food Safety program does not have a publicly available database. The PrimusGFS database (Azzule) is publicly accessible and includes information about the registered operation including but not limited to:

- a) Company Name
- b) Certification Body
- c) Products
- d) Locations
- e) Certification Status
- f) Certification Valid To & From Dates
- g) Standard Version

5.2 An applicant may not register the same product more than once with different CBs or under different certification options or standards.

5.3 For operations who have been registered and are changing from their former certification body to FSC, see section 15.1 for more information on transferring registration.

5.4 Once registration is complete, the applicant will receive login information and an application number. This number will also appear on the final certificate linking the database entry to the paper certificate.

5.5 The database search tool and login for PrimusGFS can be accessed at the following url:

<http://www.primusgfs.com/certificationRegister.aspx>

5.6 FSC shall provide information, upon request, about the validity of a given certification.

5.7 The audit reports will be uploaded directly into the database and clients will be able to access their reports once logged in. Corrective actions/non-compliance finding responses will be submitted by the client through the database. Certificates will be generated and accessible directly through the database. Clients will regularly receive notifications from the database during the certification process with information on how to proceed. Audit reports, corrective action responses and certificates are not publicly available through the database and only accessible through the client login portal. Clients may give access to their audit reports and certificates to a buyer requesting this information directly through the database; FSC will arrange this at request only.

6 EVALUATION (INSPECTION/AUDIT)

6.1 SCHEDULING

6.1.1 An Auditor will contact the applicant to schedule and confirm the audit details directly. The auditor should provide an estimate of how long the audit should take and the applicant (for PrimusGFS audits, see Estimated Audit Duration Table below to calculate approximate duration) and auditor shall agree upon a mutually convenient timeframe. Applicants should provide the auditor with any additional guidance on locating difficult to find sites at this time.

Operation Type	Approximate Duration (hours)		
	Module 1	Module 2	Module 3*
Ranch	3 hours	2 hours	N/A
Greenhouse		2 hours	N/A
Harvest Crew		1.5 hours	N/A
Storage & Distribution Center		3 hours	1 hour
Cooler / Cold Storage		3 hours	1 hour
Packinghouse		4 hours	2 hours
Processing		5 hours	3 hours
<i>Estimated audit duration table</i>			

*Duration of Module 3 can vary significantly based on the number of HACCP plans, outcome of the Hazard Analysis and the number of CCPs

6.1.2 Audit Timing - Field Operations:

- a) The commodities must be present in the field at the time of the audit.
- b) Where a commodity is not present at the time of the audit but the operation wishes to include it in the certification scope of their audit it may be considered if the commodity is considered to have similar growing processes as to what is going to be audited, and the same personnel involved.
- c) The auditor will indicate on the audit report what products were observed at the time of the audit, similar products not observed at the time of the audit and products that were not similar and not seen at the time of the audit. The auditor is to include specific detail in the scope of the audit and throughout the audit report related to which products were observed at the time of the audit, as well as which records were reviewed.

- d) *Multiple Crops*: The producer may be seeking certification for more than one crop and the crops may not all have the same seasonal timing, i.e. harvest of one crop does not necessarily coincide with the harvest of other crops. The requirements above are applicable to crop groupings based on similarities in production and harvest processes and their risks. FSC shall verify all control points of these groupings, which may require multiple site visits, before the product(s) can be added to the certificate.

6.1.3 *Audit Timing – Facility Operations*:

- a) The operation must be running and the commodities must be present in the operation during the audit.
- b) Where a commodity is not present at the time of the audit but the operation wishes to include it in the certification scope of their audit it may be considered if the products have similar production processes as to the products that are going to be audited, and the same personnel is involved.
- c) The auditor will indicate on the audit report what products were observed at the time of the audit, similar products not observed at the time of the audit and products that were not similar and not seen at the time of the audit. The auditor is to include specific detail in the scope of the audit and throughout the audit report related to which products were observed at the time of the audit, as well as which records were reviewed.
- d) Process description or flow chart, with step-by-step details of the production process and the equipment used needs to be available for review at the time of the audit.

6.2 SELF ASSESSMENT/INTERNAL AUDIT

6.2.1 The self-assessment shall:

- a) Cover all registered production sites, products and processes under the certification scope to verify compliance with the requirements defined in the applicable control points.
- b) Be carried out by or under the responsibility of the producer.
- c) Be carried out before the initial inspection and thereafter at least annually before announced subsequent inspections against the complete checklist of all relevant scope(s) and registered areas. The completed checklist shall be available on site for review at all times.
- d) The self-assessment checklist shall contain comments of the evidences observed for all non-applicable and non-compliant control points.

6.3 AUDIT EXECUTION

6.3.1 The audit shall be performed using the most recent version of the applicable standard checklist. Applicants should have received a copy of the applicable checklist in their application package and may request this document at any time from their client representative. Checklists and interpretation guidelines can also be found on the FSC website at www.foodsafetycertifiers.com/documents/.

6.3.2 All applicants shall be subject to evaluation activities including but not limited to:

- a) opening meeting;
- b) documentation review (risk assessment, food safety related policies and procedures, internal audits, records, testing results, etc.);
- c) site inspection;
- d) personnel interviews, and;
- e) closing meeting.

6.3.3 During the closing meeting, the auditor will review observations, answer any questions, explain next steps and make any requests for more information. The auditor will be able to clarify and answer any questions pertaining to the individual findings but will not be able to consult on how to make corrections.

6.3.4 The auditor will not be able to score the audit on site or speculate on the applicants pass/fail status.

6.3.5 Within 15 calendar days, the applicant will receive a preliminary Audit Report and a Non-Conformance Summary that will outline all the non-conformances found, with the corresponding comments and details for each non-conformance.

6.4 CONFORMANCE BY INDIVIDUAL QUESTIONS

6.4.1 Each question in the checklist has to be looked at individually and answered according to the observations during the audit. In the case of finding deficiencies to one question and/or its expectations, the following considerations shall be made when noting the issue(s) in the audit report:

Conformance to questions in PrimusGFS (Module 1, Module 2-GMP, Module 3) and Harmonized FS:

Answer	Criteria used
Total conformance	To meet the question and/or conformance criteria in full.
Minor deficiency	To have minor deficiencies against the question and/or conformance criteria. To have single or isolated non-severe deficiencies (usually up to three) against the question and/or conformance criteria. To have covered most of the question conformance criteria, but not all.
Major deficiency	To have major deficiencies against the question and/or conformance criteria. To have numerous non-severe deficiencies (usually more than three) against the question and/or conformance criteria. To have single or isolated severe deficiencies against the question and/or conformance criteria. To have covered some of the question conformance criteria, but not most of it.
Non-conformance	To have not met the question and/or conformance criteria requirements at all. Having systematic deficiencies against the question and/or conformance criteria (severe or non-severe issues).
Non-applicable	The requirement described in the question is not applicable for the operation being audited. Justification should be provided in the auditor's comments. Be aware that there are some questions that do not allow answering Non-applicable.

Conformance for questions in PrimusGFS (Module 2-GAP):

Answer	Criteria used
Total conformance <i>(can be Yes or No, depending on the question)</i>	To meet the question and/or conformance criteria in full. This is when the answer Yes or No is the same as the "earning points answer".
Non-conformance <i>(can be Yes or No, depending on the question)</i>	The question or conformance criteria have not been fully met. This is when the answer Yes or No is NOT the same as the "earning points answer".
Non-applicable	The requirement described in the question is not applicable for the operation being audited. Justification should be provided in the auditor's comments. Be aware that there are some questions that do not allow answering Non-applicable.

6.4.2 There are some questions in the PrimusGFS checklist (not applicable for Harmonized Food Safety), that if down scored will lead to an automatic failure and an overall score of 0% for the corresponding Module. These questions are identified with a phrase similar to: “ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE”. The applicant will be immediately informed of the automatic failure by the auditor during the audit.

6.4.3 FSC reserves the right to fail the audit due to special circumstances for example, deliberate illegal activities, physical acts/threats to an auditor, attempted bribery, falsified records, etc. or finding serious food safety issues during the audit.

6.5 NON-CONFORMANCES AND CORRECTIVE ACTIONS

6.5.1 If non-conformances are detected, applicants have the opportunity to improve their score by submitting a corrective actions summary and supporting evidence to clear each non-conformance. Note that for PrimusGFS GMP audits with an overall preliminary score less than 85%, the auditee can send corrective action details to FSC for review, but accepted corrective actions do not change the final score.

6.5.2 Evidence of corrective actions can be in the form of documents, records and/or photographs and it must be appropriate to show the non-conformance has been addressed.

6.5.3 Corrective actions must be submitted within 30 calendar days from the original audit date. FSC will review corrective actions within 15 days of submission and notify the applicant if it was accepted or not.

6.5.4 FSC has the right to determine if a re-visit to the audited organization is necessary to verify corrective actions for any non-conformance found.

6.5.5 If time allows (within the 30 calendar day corrective action timeframe), when corrective action evidence is rejected by the auditor, the applicant can re-submit additional evidence to close the non-conformance.

6.5.6 The applicant organization should be aware that some non-conformances may not be able to be corrected due to the issue that has been detected and any other circumstances.

6.5.7 Once the applicant has completed corrective actions response or when the corrective actions window has closed, a final audit report will be generated. FSC will close the corrective action phase in the PrimusGFS system, which will allow for the certification decision to be made (see section 7).

7 FINAL REVIEW & CERTIFICATION DECISION

7.1 SCORING

7.1.1 Score calculation varies from standard to standard. Detailed explanations of scoring systems can be found in the applicable General Regulations; a basic summary is outlined below:

- a) *Harmonized Food Safety* – applicant seeking certification must have no major deficiencies or non-conformance findings. Applicant may have minor deficiencies that must be cleared by next inspection.

- b) *PrimusGFS* – score calculation is per module and per operation. There are two types of score calculations done in each audit:
- i. **Module Percentage Score:** calculated for each module of the audit, considering the total sum of points obtained in the module, divided by the total possible points in the module. Each one of the Module Scores for the operation must be a minimum of 85% Module and/or option in order to be certified. All Overall Scores for GMP audits must be 85% in the preliminary stage in order to receive certification. If the preliminary score is less than 85%, a not certified decision is made. Another audit will be necessary to receive certification.
 - ii. **Audit Percentage Score:** calculated for each operations, considering the total sum of points obtained in the entire audit, divided by the total possible points in the entire audit. Audit Percentage Score must be at least 90% to achieve certification.
 - iii. The scores shall be displayed in rounded down percentages.
 - iv. Score calculation will be repeated for each operation included in the certification scope.

7.2 REVIEW & DECISION

7.2.1 FSC shall review all information and make the certification decision no more than 45 calendar days from the audit date. A notification email will be sent to the applicant informing them of the outcome of the final review.

7.2.2 Those operations not complying with the minimum scoring requirements shall be denied certification. FSC shall notify the client of a decision not to grant certification and shall identify the reason for the decision. If the applicant wishes to continue seeking certification, the assessment process will be repeated and an additional site inspection & audit will be necessary.

8 CERTIFICATION DOCUMENTATION

8.1 The Certification is valid for a maximum period of 12 months from the certification date.

8.2 The Certificate will include all the necessary information about the certified operation, including but not limited to:

- a) the name and address of the certification body;
- b) the date certification is granted (the date shall not precede the date on which the certification decision was completed);
- c) the name and address of the client;
- d) the scope of certification;
- e) the term or expiry date of certification.

8.3 The Certificate shall include the signature of the Executive Director as the authorized representative of the certification body.

8.4 The Certificate shall only be issued after, or concurrent with, the following:

- a) the decision to grant or extend the scope of certification has been made;
- b) certification requirements have been fulfilled;
- c) the certification agreement has been completed/signed.

9 USE OF LOGO & TRADEMARK

9.1 Suppliers are permitted to use the applicable PrimusGFS or Harmonized Food Safety Trademark and logo when there is a valid applicable certificate linked to that supplier and making clear reference to the certified operations.

9.2 The trademark and logo must be requested by the certified operation from FSC and always contain the exact corporate color and format as shown here:



9.3 The rules for the use of the PrimusGFS logo and trademark are defined in ANNEX 1: Use of PrimusGFS Logo and Trademark, and the Sublicense Agreement signed between FSC and each operation. Infringement of the rules could lead to Adverse Actions (see section 13).

10 SURVEILLANCE - PRIMUSGFS

10.1 As part of the PrimusGFS Integrity Program, the Scheme Owner will perform sporadic auditor assessments. The purpose is to ensure that qualified auditors are performing the audits properly according to the PrimusGFS scheme.

10.1.1 The audited operations will be required to accept a second person on-site during the audit.

10.1.2 The additional person on-site during the auditor assessments will have no say during the audit nor will they point out any deficiencies to the auditor at the time of the audit.

10.2 The Scheme Owner will also have the option to perform auditee assessments, which will consist of the Scheme Owner performing an on-site audit for a certified operation. These Surveillance audits will be performed using the current PrimusGFS checklist, and the selected organization with certified processes will need to pass the audit as if it were a regular audit in order to maintain certification.

10.2.1 By performing these audits, the Scheme Owner will be able to verify auditor performance (based on the prior audit report) to what was observed at the time of the Surveillance audit.

10.2.2 The audited operations will be required to accept a second person on-site during the audit.

11 CHANGES AFFECTING CERTIFICATION

11.1 When scheme owners introduce new or revised requirements that affect the client, FSC shall ensure these changes are communicated to all clients by their Client Representative through email. FSC

shall verify the implementation of the changes by its clients at the next scheduled inspection and may take other actions as required by the scheme owner.

11.2 FSC shall consider other changes affecting certification, including changes initiated by the client, and shall decide upon the appropriate action. Clients, per the signed FSC Certification Agreement, must inform FSC of any changes that may affect certification.

11.3 Clients may apply for an extension of scope to their current certification at any time by contacting their client representative. A scope extension may require a remote desk assessment or additional on-site inspection depending on the standard, location, products, machinery, workers, etc.

11.4 The action to implement changes affecting certification shall include, if required, the following:

- a) application review (see section 4);
- b) registration (see section 5);
- c) evaluation (see section 6);
- d) final review & decision (see section 7);
- e) issuance of revised Certificate to extend or reduce the scope of certification (see section 8).

12 RENEWAL

12.1 Three (3) months prior to the expiration date of the Certificate, FSC will send a Renewal Package which will consist of the following:

- a) Annual Update form or online application reminder;
- b) the most current Certificate on file;
- c) Estimate.

12.2 To initiate renewal of certification, a certified operation must pay their estimated certification fees in full and submit their Annual Update or online application including the following information:

- a) a summary statement, supported by documentation if necessary, detailing any deviations from or changes to the previous year's food safety plan;
- b) any additions or deletions to the previous year's certification scope, including sites and products;
- c) any additions to or deletions from the information regarding the applicant's business name, address, and telephone number, the person authorized to act on the applicant's behalf.

12.3 Once a complete Renewal Package has been returned, a full assessment will begin including:

- a) application review (see section 6);
- b) registration (see section 7);
- c) evaluation (see section 8);
- d) final review & decision (see section 9);
- e) issuance of updated Certificate (see section 10).

12.4 CERTIFICATE EXTENSION

12.4.1 The validity may be extended beyond the 12 months for a maximum period of 15 months past the audit date for PrimusGFS or 18 months past the audit date for Harmonized Standard.

12.4.2 Upon the extension request, FSC will verify applicant has submitted the renewal application and paid their certification renewal estimate in full.

13 ADVERSE ACTIONS

13.1 SANCTION REQUIREMENTS

13.1.1 If upon inspection of a certified operation FSC finds a nonconformance with the applicable scheme General Regulations, the applicable standard or the FSC Sublicense Agreement, a sanction shall be issued and appropriate actions taken.

13.1.2 When appropriate action includes evaluation, review or certification decision, the requirements in sections 6 and 7, respectively, shall be fulfilled.

13.1.3 All sanctions shall be in writing and shall include the nature of the nonconformance, the time frame for resolution (if applicable) and provisions for escalation of sanctions if the nonconformance is not corrected within the specified period.

13.1.4 If certification is withdrawn/terminated (by request of the client), suspended, or revoked, FSC shall make all necessary modifications to the Certificate, public information, etc., in order to ensure it provides no indication that the product continues to be certified. If certification is reduced, FSC shall make all necessary modifications to the Certificate, public information, etc., in order to ensure reduced scope of certification is clearly communicated to the client and clearly specified in certification documentation and public information.

13.1.5 FSC may only lift the sanction after sufficient corrective actions have been submitted with verification either through written or visual evidence and/or on-site visit. When a sanction has been lifted, the client will receive a Notice of Resolution and FSC shall make all necessary modifications to the Certificate, public information, etc., to order to ensure all appropriate indications exist that the product continues to be certified.

13.1.6 Sanctions can be issued to an entire certified organization or narrow it to a specific certified product or specific operation within the scope of the current certification.

13.1.7 FSC shall notify scheme owners in a timely manner and in writing of any sanction applied to a certified organization.

13.1.8 FSC may provide the client with a notification of the proposed adverse action (i.e. Notice of Proposed Suspension) or they may issue the sanction immediately.

13.2 SUSPENSION

13.2.1 An organization's certification shall be suspended if:

- a) A non-conformance is found to be a food safety issue and an immediate threat to the public;
- b) An inspection results in an automatic failure (PrimusGFS only). If a critical food safety issue is detected during an audit (e.g., automatic failure, special circumstance, etc.), then FSC should consider suspending existing certificates related to this new observation(s);
- c) The organization improperly uses the PrimusGFS, GlobalGAP, FSC, Harmonized GAP, ANSI or GFSI logo or trademark;
- d) An organization is involved with an illegal activity or serious food safety issue.

13.2.2 The Scheme Manager shall be responsible for formulating and communicating to the client actions needed to end suspension and restore certification for the product(s), with the help of the operation's Client Representative to follow up with the client.

13.2.3 Corrective Actions to non-conformances addressed in a suspension shall be reviewed and approved by the Scheme Manager.

13.3 REVOCATION/CANCELLATION

13.3.1 An organization's certification shall be revoked/canceled if:

- a) An organization does not pay the agreed to fees;
- b) Evidence of fraud is found;
- c) A suspension related issue is not adequately resolved;
- d) The organization declares bankruptcy;
- e) An organization that has had its certification revoked shall not be accepted for certification in the PrimusGFS program for a period of six months after the date of revocation

13.3.2 An organization that has had its certification revoked shall not be accepted for certification in the PrimusGFS or Harmonized Food Safety program for a period of six (6) months after the date of revocation.

13.4 VOLUNTARY WITHDRAWAL/TERMINATION

13.4.1 At any time during the certification process or once certified, the client may voluntarily withdraw/terminate certification. The request to discontinue certification shall be in writing.

14 COMPLAINTS, MEDIATION, AND APPEALS

14.1 COMPLAINTS

14.1.1 FSC shall acknowledge the receipt of complaints and investigate complaints, brought by operators or third parties concerning FSC performance or concerning the compliance of certified operators. FSC will be responsible for gathering and verifying all necessary information (as far as possible). Complaints shall be submitted in writing with supporting evidence to document the complaint.

14.1.2 Complaints will be dealt with in a timely and efficient manner. FSC shall investigate all complaints by persons designated by the Executive Director who were not involved with the evaluation, certification decision, and present no other direct or indirect conflict of interest. The Executive Director shall be responsible for communicating the final decision to the appropriate authorities or persons of interest, applicant/certified operator and complainant.

14.1.3 When a complaint is resolved, a documented resolution shall be made. If known, the complainant shall be informed of the general outcome of the complaint in a way which does not prejudice the confidentiality of the party.

14.1.4 Certified operators shall take appropriate action on complaints made to their own operations, keep a record of all complaints made and document all actions taken. Said records shall be subject to review by FSC.

14.2 MEDIATION AND APPEALS

14.2.1 Certified operators have the right to due process regarding disputes arising from certification decisions and actions related to certification.

14.2.2 Any dispute with respect to denial of certification or proposed suspension or revocation of certification may be mediated at the request of the applicant for certification or certified operation and with acceptance by FSC.

14.2.3 An applicant or certified operator may appeal a decision by FSC to deny, suspend or revoke certification.

14.2.4 How To Submit An Appeal:

- a) Appeals must be received by FSC within 30 days of notification to the Applicant / Certified Operator of the adverse decision. The appeal shall:
 - i. Specify the grounds on which the appeal is made;
 - ii. Be accompanied by relevant documented evidence;
 - iii. Indicate what steps were taken to resolve the issue prior to lodging the appeal.
- b) Appeals may be submitted via email, fax, and registered mail or equivalent. Within five (5) days of FSC's receipt of an appeal, FSC shall send confirmation to the appellant of its receipt of such appeal.
- c) All appeals must be accompanied by an appeal fee to offset the costs and staff time associated with process of the appeal.

14.2.5 An appeal may first be mediated at the request of the applicant / certified operator and with acceptance by FSC. Mediation shall be requested in writing to FSC within 30 days of notification to the Applicant / Certified Operator of the adverse decision. If FSC rejects the request for mediation, FSC shall provide written notification to the applicant / certified operator. If mediation is accepted by FSC, such mediation shall be conducted by a qualified mediator mutually agreed upon by the parties to the mediation. The parties to the mediation shall have no more than 30 days to reach an agreement following a mediation session. If mediation is unsuccessful, the appeal shall proceed for review by the Appeals Committee, as outlined below.

14.2.6 Review by Appeals Committee:

- a) The burden of proof to show adverse effect shall be on the Appellant.
- b) Records of appeals are maintained in an Appeals Log or an appropriate notation is made in the Log while records are kept with the process of the applicant / certified operator's files. FSC maintains records related to the appeal, including evidence of communication, final decision and any follow-up actions taken.
- c) The Appeals Committee shall be screened for any potential conflict of interest.
- d) Appeals Committee members shall review the appeal and may:
 - i. Rule in favor of the appellant, promptly notifying the appellant and taking the appropriate actions;
 - ii. Rule against the appellant, notifying the appellant of this decision;
 - iii. Request additional information from the appellant or involved parties;
 - iv. Involve assessors or other experts, screening them for conflict of interest in coordination with the appellant;
 - v. Take any other action that is necessary or appropriate.

15 COOPERATION WITH OTHER INSPECTION & CERTIFICATION BODIES

15.1 CHANGING CERTIFICATION BODIES

15.1.1 Operators that choose to change certifying bodies must complete an application form as required by the new certifier and notify their current certifier of their intent to change certifiers. Operations intending to continue to sell certified product must maintain their current certification until their new certifier has issued documents (i.e. certificate, and/or certification decision letter) confirming their certification. Operations may have to continue the certification process with the first certifier while becoming certified under the new certifier or risk a noncompliance.

15.1.2 If a producer who has already been registered changes CB or applies to a new CB for certification of a different product, the producer shall communicate their azzule registration number to FSC.

15.1.3 Certificate holders who are sanctioned cannot change CB until the outgoing CB closes the corresponding non-conformance.

15.1.4 Once certification is granted under the new certifier, the operation must then notify their former certifier of their certification status with their new certifier and return all documents confirming their certification with their first certifier, such as certificates and attestations and withdraw/terminate their certification. The former certifier will issue a notice to the operation that their first certification is no longer in effect and that all certification agreements are terminated.

15.1.5 During this process, FSC will exchange relevant information on the results of their evaluations, inspections and/or certification reviews with the other certification body, competent authorities, or control authorities either upon request or on their own initiative.

15.2 RECOGNITION OF OTHER CERTIFICATION BODY DECISIONS

15.2.1 FSC will recognize decisions made by other certification bodies, insofar as that organization has been approved by Azzule and/or GlobalGAP and accredited to ISO 17065 with respect to an equivalent accreditation scope, and maintain its responsibility for the certification decision resulting from the recognition.

15.2.2 FSC may use this recognition as the grounds to exclude certain assessment activities (i.e. harvest crew).

ANNEX 1: USE OF PrimusGFS LOGO AND TRADEMARK

A. Introduction

1. The PrimusGFS logo and trademark (collectively, the “Logo”) is owned by Azzule.
2. Upon certification, a Certified Organization (“CO”) is allowed a non-exclusive revocable license to use the PrimusGFS logo for the duration of their certification, in accordance with, and limited to, the rules expressly promulgated in this Exhibit C.
3. COs do not acquire any physical or intellectual proprietary rights in the Logo beyond the license granted herein
4. COs must obtain the electronic data file or hardcopy of the Logo, from their respective Certification Body (“CB”).

B. Obligations of a Certified Organization

1. A certified organization shall:
 - a. not use Logo as a product certification mark and shall never use it on their products or packaging of product;
 - b. Only use the logo in business to business communications such as website, invoices, letterhead, promotional material, etc;
 - c. Only use Logo in a manner consistent with the registered scope of their certification. Operations and/or products not included in the CO’s registered scope are not certified and CO is prohibited from using the logo in any way that would indicate or imply otherwise;
 - d. Pay all fees and costs set by Azzule and/or as agreed to with their CB; and,
 - e. Cooperate with Azzule and its agents to allow reasonable access to verify compliance with these rules

C. Suspension and Revocation of Use of the PrimusGFS Logo

1. Azzule or CB may suspend CO’s license for use of the Logo if, at Azzule or CBs sole discretion, it determines that:
 - a. CO fails to comply with these rules;
 - b. the certified organization fails to be meet re-certification requirements;
2. Azzule or CB may revoke CO’s license for use of Logo if:
 - a. CO uses the Logo in a manner that is intended to be detrimental to Azzule or the PrimusGFS program;
 - b. CO fails to correct the issues or conditions that led to the suspension of the use of the logo within the time frame agreed to with their certification body;
 - c. the certified organization ceases operation or declares bankruptcy.
3. Upon written notice of such suspension or revocation of license to use the Logo, CO agrees to immediately discontinue using Logo, and cease use of any promotional materials, websites, or communications on which the Logo may be published.

D. Appeal of Suspension or Revocation of License to use the Azzule Logo.

1. CO may appeal a decision to suspend or withdraw the use of the Logo by notifying Azzule and its CB, in writing, within 14 days of the date of the notice of suspension.
2. The appeal will be handled in accordance with the appeals process of the CB or Azzule, whichever is applicable, but under no circumstances in a way that contravenes GFSI rules or Regulations or the governing documents.