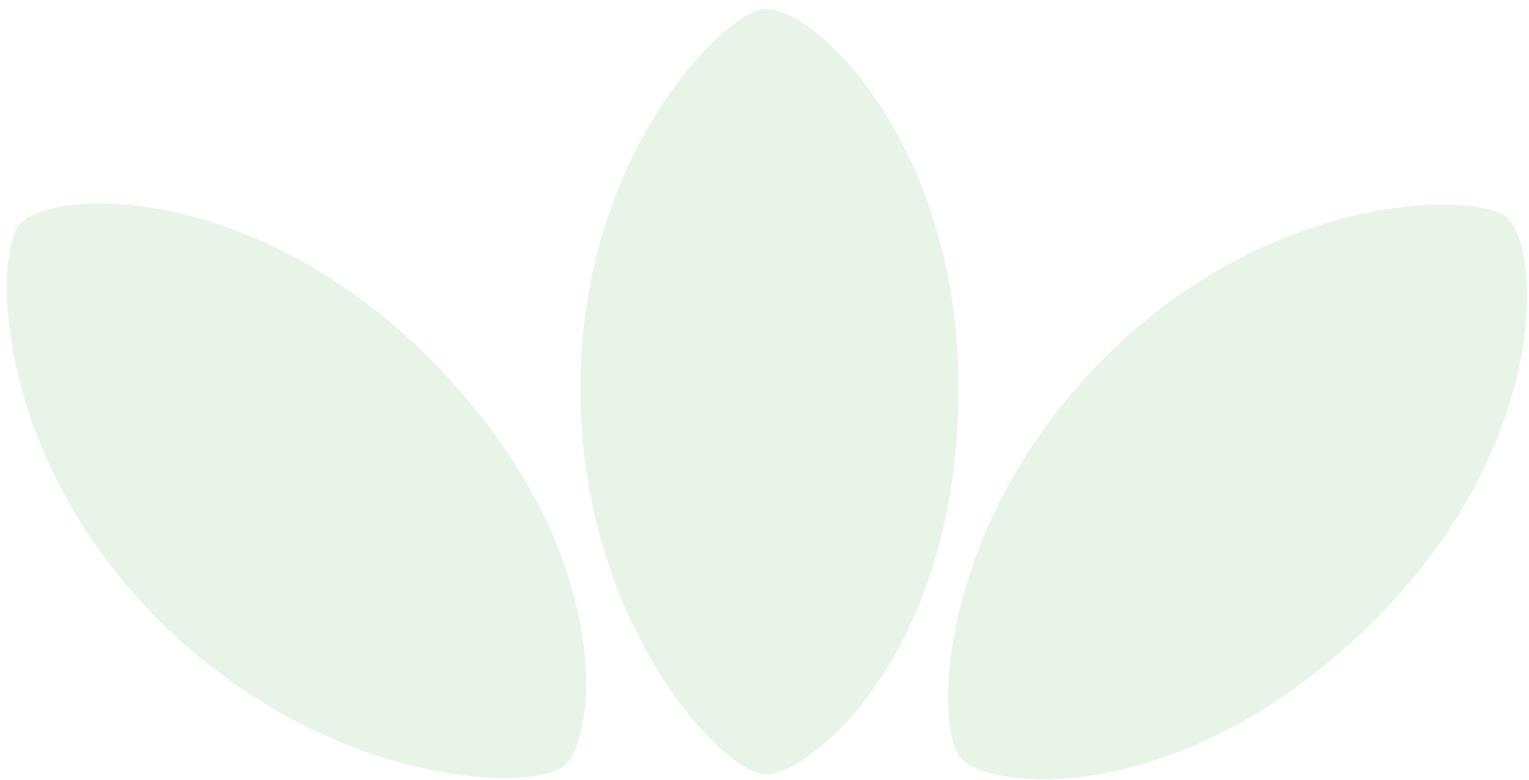




Scheme Operating Protocols

Effective from: 1st July 2013



GTAS Scheme Manual
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	SCHEME OPERATING PROTOCOLS
1.0 REV	<p>INTRODUCTION</p> <p>The Gafta Standards offer the general public and consumers genuine assurance about the operation of the international grain and feed trade in relation to public safety, food and feed safety and the environment. These standards require the maintenance of comprehensive records of companies' activities and this is monitored by an independent certification company to verify compliance. Companies will only be certified if they can meet the appropriate standards.</p> <p>Certification to these standards is therefore conditional on a successful initial audit assessment and annual audit assessments thereafter. The certification system is an independent third party system for determining a company's conformity to the GTAS standards for trading and logistical services provided within the scope of the scheme manuals. The certification system requires examination of the trading process, the storage, handling, inspection, analysis and transport of traded goods, and assessment of the quality management system. Acceptance after initial assessment is followed by ongoing annual audits. Details of all applicants and their certification status will be forwarded to Gafta. The certification system is linked to a Certificate of Conformity and approved scheme marks. The mark is the property of the scheme owners, the Grain and Feed Trade Association and is issued, under licence, through NSF Certification Ltd. NSF Certification Ltd is appointed by Gafta as lead Certification Body under this scheme. From time to time, other Certification Bodies (CB) may be approved to audit and certify the GTAS scheme and be licensed to issue scheme marks. Certification Bodies appointed by Gafta are required to be accredited by a national body affiliated to IAF.</p>
2.0	<p>APPLICATION</p>
2.1	NSF Certification Ltd or other approved CB will send companies wishing to be certified an application pack and supporting literature (schemes overview, operating protocol and manuals as appropriate).
2.2	Companies should make an application in respect of the manuals for which they wish to be audited for compliance.
2.3	<p>Companies should complete the relevant form in full and submit it to NSF Certification Ltd or other approved CB, together with the appropriate fee. The owner of the business or a duly authorised employee must sign the form(s).</p> <p>By signing and returning an application form companies agree to be bound by the Scheme standards and operating protocols. The scheme owners reserve the right to alter the standards and operating protocols for schemes where, at their absolute discretion, they consider it necessary to do so and changes will be notified.</p>
3.0	<p>MEMBERSHIP</p>
3.1	<p>New Applicants - Applications will be received at any time of the year and assessments will be carried out against the standards in force at that time.</p> <p>Renewal for Existing Members – Renewal of Certification will be conditional upon the receipt of the appropriate fee on or before the anniversary date of the scheme membership. Receipt of payment and signed renewal paperwork will be confirmation that the member will operate to the current scheme standards and operating procedures.</p>
4.0	<p>INDEPENDENT ASSESSMENT</p>
4.1	Routine surveillance assessment will be carried out annually at any time during the year.
4.2	Once the application or renewal form has been accepted, arrangements will be made for an assessment visit.
4.3	Assessment visits will normally be by appointment with the company, however, NSF Certification Ltd or other approved CB, reserves the right to make short notice or unannounced visits.
4.4	All participants agree to give employees and agents of NSF Certification Ltd or other approved CB, reasonable access to their business and relevant sites to carry out the assessment visits required. Failure to do so will result in the suspension of membership. Reasonable notice will be given of any routine assessment visit.



Scheme Overview

4.5 NEW	<p>Renewable Energy Directive (RED) Whilst undertaking assessments of compliance with the RED manual of GTAS, scheme assessors shall establish at least a “limited assurance level” as defined in the ISAE 3000 standard.</p>																		
4.6	<p>Once the assessment visit has been completed, NSF Certification Ltd or other approved CB, will either issue the applicant with a ‘notice to remedy’ for non-conformances or forward the assessment report for certification. Non-conformances will be graded as Major or Minor, defined as follows:</p> <p>Major - a substantial failure to meet any clause of the Standard</p> <p>Minor - a clause has not been fully met</p> <p>The level of non-conformity assigned by an evaluator against a requirement of the Standard is based upon evidence and observations made during the evaluation.</p>																		
4.6	<p>Key/other standards</p> <p>Standards marked “K” indicate a “key” standard. If the assessor finds a major non-conformance against one of the key standards it will result in suspension of certification until it is put right. Non-conformances against “other standards” should not result in suspension provided they are corrected within the agreed timescale with the assessor (see 1.4.7). The CB also reserves the right to suspend certification in the case of a large number of non-conformances or in the event that the same non-conformances are found on successive assessment visits. Summary table:</p>																		
	<table border="1"> <thead> <tr> <th>Assessment outcome</th> <th>Conforms</th> <th>Major N/C</th> <th>Minor N/C</th> </tr> </thead> <tbody> <tr> <td>Key Standards</td> <td>Certified</td> <td>Certificate suspended until rectified</td> <td>Certificate not suspended but must be rectified</td> </tr> <tr> <th>Assessment outcome</th> <th>Conforms</th> <th colspan="2">Non-conformance</th> </tr> <tr> <td>Other Standards</td> <td>Certified</td> <td colspan="2">Certificate not suspended but must be rectified</td> </tr> </tbody> </table>			Assessment outcome	Conforms	Major N/C	Minor N/C	Key Standards	Certified	Certificate suspended until rectified	Certificate not suspended but must be rectified	Assessment outcome	Conforms	Non-conformance		Other Standards	Certified	Certificate not suspended but must be rectified	
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4.7	<p>Certificates may be granted to participants who have had an assessment against the appropriate GTAS Standard and have closed any non-conformances identified at the assessment.</p> <p>Non-conformances may be closed by submission of documentary evidence or by revisit. Non-conformances must be closed within 3 months of an initial audit assessment or 28 days for any subsequent audit assessment.</p>																		
4.8	<p>The company should inform NSF Certification Ltd. or other approved CB, once any non-conformance(s) has been remedied and submit documentary evidence. NSF Certification Ltd. or other approved CB may then arrange for a site revisit in circumstances where product integrity may be compromised. The costs associated with these procedures, including any additional visits will be borne by the company, but will be kept as low as reasonably possible.</p>																		
4.9	<p>Assessors may refuse to carry out an assessment in the presence of a third party who they believe will, intentionally or otherwise, influence its outcome in an inappropriate manner.</p>																		
4.10	<p>Certificates will be issued when the company meets the certification requirements. Certificates are not transferable and remain the property of issuing CB. Once a Certificate has been issued, a company may promote themselves as being ‘GTAS Assured’.</p>																		
5.0	<p>SUSPENSION/TERMINATION OF MEMBERSHIP</p>																		
5.1	<p>Failure to supply satisfactory documentary evidence within 28 days of a surveillance assessment or pass a revisit where necessary will result in the company being suspended, and the database altered accordingly. All revisit costs will be borne by the company.</p>																		
5.2	<p>NSF Certification Ltd. or other approved CB, reserves the right to suspend or withdraw certification when it considers that it is necessary to do so to prevent the Scheme from being brought into disrepute. Failure to reinstate from ‘suspended’ status within 28 days will result in withdrawal from the scheme.</p>																		
6.0	<p>APPEALS</p>																		
6.1	<p>In the event that a company feels they have been incorrectly assessed during an assessment visit, they have the option to ask, within 14 days, for a re-assessment by another assessor appointed by the CB. If the company’s complaint is upheld, there may be no cost for this and any suspension of membership that may have been</p>																		



6.2	<p>imposed will immediately be lifted. If the findings of the original assessment are corroborated, or if it is clear that the company has taken action in the interim that will materially affect the outcome of the re-assessment, the cost of the visit will be borne by the company. Any requests for re-assessment visits will be undertaken as soon as possible by the CB.</p> <p>If a company still feels that they have been incorrectly assessed following the procedure outlined in 6.1 above, they will have the option of having their appeal heard by a panel convened for this purpose by the CB. This panel will consist of at least three persons and will normally include one person involved in grain and feed trade management, one person involved at another stage in the grain and feed industry and one person not directly involved in the areas covered by the Scheme. A company may either put their own appeal to the panel or nominate someone to do so on their behalf. In the latter case the Company will still be expected to attend the panel session. Both sides will endeavour to keep costs to a minimum. In the event that an appeal to the panel is upheld, all costs reasonably incurred by the appellant will be met by the CB. If an appeal is turned down, any costs reasonably incurred through the operation of the panel will be borne by the Company.</p>
7.0	<p>USE OF TRADE MARK AND/OR LOGO</p>
7.1	<p>Companies certified to the standards shall be permitted to indicate that they hold a certificate and, for that purpose only, shall be permitted to use on stationery, publicity materials, exhibition stands and signage, the Trade Mark and/or the Logo in accordance with directions from Gafta with regard to the use of the Trade Mark and/or the Logo. Certified participants agree to observe all such directions.</p>
7.2	<p>The above consent, in so far as it applies to use of the Trade Mark, is limited to using the entire designation “GTAS Assured” and, in so far as it applies to using the Logo, is limited to using the Logo in an identical form to that used by Gafta. The consent is personal to the certified participant and may not be transferred or licensed to any other business.</p>
7.3	<p>Certified participants shall not use (or authorise or license others to use) the Trade Mark and/or the Logo in any way outside the scope of the above consent and they shall not use or authorise or license others to use any name, mark, sign or device confusingly similar to the Trade Mark and/or the Logo nor file or cause to be filed any trade mark or company name registration applications containing or confusingly similar to the Trade Mark and/or the Logo. The certified participant will not oppose or cause any opposition to be filed to any trade mark applications filed by the Grain and Feed Trade Association, register the Trade Mark and/or the Logo anywhere in the world nor otherwise cause any question to be raised concerning the company’s ownership of the Trade Mark and the Logo.</p>
7.4	<p>Gafta reserves the right, after giving one months notice or upon immediate notice if the certified participant fails to observe the directions of the Company with regard to the use of the Trade Mark or the Logo or if certification is suspended or terminated for whatever reason, to withdraw permission to use its Trade Mark or Logo to any certified participant.</p>
8.0 REV	<p>CERTIFICATION RULES</p> <p>The Grain and Feed Trade Association as owners of the Gafta Trade Assurance Scheme may contract with Certification Bodies (CB) to undertake assessments and certifications under the Scheme. Such agreements shall be set down in a contract to be retained by Gafta and the appointed Certification Body. Certifications under the Scheme meet EN 45011 ISO/IEC Guide 65 standards. Certification Bodies agree to meet certain requirements regarding administration and performance. These must include:</p> <ul style="list-style-type: none"> • Assessor competency <p>The CB may only utilise assessors for audits under the Gafta Trade Assurance Scheme that meet the following minimum set of criteria:</p> <p>Education and Technical Requirements:</p> <ol style="list-style-type: none"> 1. Assessors must have had a minimum of 3 years work experience within the scope to be assessed and/or training within the scope of the scheme. 2. Have had formal recognized HACCP training. 3. Possess a formal qualification in agriculture, food or related biosciences. 4. Possess NPTC farm inspection or lead assessor qualification. 5. Demonstrable competency within the module of the standard to be assessed. 6. For RED assessments the Assessors must be competent in Green House Gas (GHG) assessments, Mass Balancing (MB) and Chain of Custody (C of C) systems. 7. Have evidence of, and undertake ongoing training as required.



Scheme Overview

	<ul style="list-style-type: none"> • Training and evaluation of assessors Assessors must receive the appropriate training and evaluations in accordance with approved written procedures. • Rights of Scheme owner to perform audits at CB office Gafta has the right after giving reasonable notice, to attend at the offices of the Certification Body with the express purpose of auditing scheme assessments and certifications. The Certification Body shall provide its full cooperation and reasonable access to all scheme related documents for this purpose. • Rights of Scheme owner to supervision visits of CB Gafta has the right after giving reasonable notice to perform supervision visits of the Certification Body and/or undertake any witnessed audits it feels is appropriate. • Minimum number of audits per year per assessor Scheme assessors are required to undertake a minimum of 5 assessments per annum. Where an assessor does not meet the minimum requirement they are required to undertake further training before continuing with assessments under the scheme. • Minimum number of auditor training hours Training of assessors should be appropriate to the standard and meet UKAS requirements. It is envisaged that regular training seminars should be held by the CB. Assessors undertaking a minimum of 5 audits per annum are expected to participate in a minimum of 5 training hours per year. • Independence of auditor and audited company In order to prevent excessive familiarity with any single audited company, scheme assessors may not audit a company more than 5 times in succession. After a maximum period of 5 years the CB is obligated to instruct a different assessor to undertake these scheme audits. • Average audit times Scheme assessors are not constrained by any time limits for conducting assessments under the Gafta Trade Assurance Scheme. Assessors are required to take any reasonable time to complete scheme audits in accordance with scheme requirements and charge for this service accordingly. Assessments for compliance with the scheme protocols vary on a site to site basis. As an indication for planning purposes, under normal conditions (which assume an average standard of working practices and written procedures) the following times taken per assessment visit may be expected to apply: Trading and Merchanting Manual – 3 hours Transport by Road (medium/large operation) - 2-3 hrs Transport by Road (owner/driver, small operation) – 1-2 hours Storage and Handling (small store) – 2-3 hours Storage and Handling (large store) – 3-4 hours Analysis and Testing (small laboratory facility linked to store) – 1 hour. Analysis and Testing – (full laboratory facility) – 3 hours Supervision Manual – 3 hours Fumigation Manual – 2 hours
9.0	<p>Where a CB demonstrably does not meet its scheme delivery requirements the Council of Gafta may elect to carry out an independent audit by a qualified audit company at its choice and expense. After receipt of the results of the audit, the Council of Gafta - operating under the Gafta disciplinary procedures - may in its absolute discretion decide the appropriate action to be taken, which may include the withdrawal of the rights to conduct assessments and issue certification under the scheme.</p>
10.0	<p>CONFIDENTIALITY</p> <p>All references to agents of Gafta refer only to those persons appointed, employed or contracted by Gafta to provide computing and/or database services or in connection with such services as are required to maintain the database.</p>
10.1	<p>Details of registered participants are held on a database. Where an enquirer is able to quote the name and address or name and registration number of a certified participant The Grain and Feed Trade Association or its agents will confirm the member's certification status, and the GTAS Manuals to which they refer. No other specific information will be given without the permission of the certified participant.</p>



10.2	The Grain and Feed Trade Association and its agents reserve the right to also release information from its database about the certification status of a participant to a person (for example such as The Food Standards Agency) with a legitimate interest in knowing that information if proof of certification might be in the member's interest. The member accepts that information about his lack of certification status may be revealed under the provisions of this paragraph.
10.3	The Grain and Feed Trade Association may produce and publish statistical reports drawing upon aggregated Scheme data so that individual data cannot be traced back to individual applicants or members.
10.4	Participant data may be retained on the above mentioned databases and will be treated as specified above for up to 5 years after a person has ceased to be a member of The Grain and Feed Trade Association Scheme.
11.0	DISCLAIMER
11.1	Under no circumstances will The Grain and Feed Trade Association or its employees or agents (e.g. NSF Certification Ltd. or other approved CB) be liable for any losses, damage, charges, costs or expenses of whatever nature (including consequential loss) which any producer may suffer or incur by reason of or arising directly or indirectly out of the administration by The Grain and Feed Trade Association or its employees or agents or the performance of their respective obligations in connection with the standards save to the extent that such, loss, damage, charges, costs and, or, expenses arise as a result of the finally and judicially determined gross negligence or wilful default of such person.
11.2	If any competent authority considers that any of the operating protocols are unreasonable, then the operating protocols shall be taken to be varied in such a way as shall make them reasonable but no other part of the operating protocols shall be affected.
11.3	These operating protocols represent the entire understanding between companies operating in the grain and feed trades and The Grain and Feed Trade Association and each company acknowledges that they have not relied upon any other statement (written or oral) in applying to be certified to the standards.