

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

PRINCIPLES AND CRITERIA – VERIFICATION METHODS FOR SUBCONTRACTORS

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INTRODUCTION

The objective of this document is to clarify which agricultural subcontractors' activities shall be included and which ones shall not be included in the GRASP assessment, as well as the expected verification method for each principle and criteria (P&C). The GRASP general rules indicate that the producer is responsible for providing the certification body (CB) with evidence of labor subcontractors' GRASP compliance. If the CB is not able to verify compliance due to a lack of necessary evidence for the subcontractor (e.g., lack of documents, no access to evidence), a non-conformance shall be raised for the respective P&C (see GRASP general rules, section 6.2.1).

Concepts and definitions on subcontracting in the context of GRASP

- **Subcontractor:** An individual or entity (company) that provides services, tasks, or activities to producers. A subcontractor performs their work (usually) based on an agreement for the job being completed with the producer, but always outside the producer's direct control.
- **Labor subcontractor:** A subcontractor that provides workers to a producer to perform farm labor. Both labor subcontractors and producers share responsibility for the wellbeing of the workers provided and the GRASP requirements compliance.
- **Farm labor:** Agricultural work (activities) strictly related to the main farming activities of production of the produce in the scope of the producer's IFA certificate
- **Main farming activities:** Activities (such as soil management, seeding, planting, irrigation, fertilization, weed control, pruning and thinning, harvesting and post harvesting management) directly related to the agricultural production of the produce in the scope of the producer's IFA certificate. The concept excludes activities such as fencing the property or construction of a farm barn.
- **Subcontracted worker(s)/labor:** Workers hired through labor subcontractors to perform main farming activities at the producer's farm and without a direct employment contract with the producer. The producer may or may not have some supervision of the workers farming activities at the farm. The labor subcontractor is the direct employer and acts as intermediary, taking care of hiring, transporting, paying, registering, and providing a specified number of workers to the producer.
- **Sham contracting:** When a labor subcontractor deliberately characterizes workers as a subcontracted workers although they work under the direct responsibility of the producer. In this case, the producer exerts, beyond some supervision, a significant degree of control, decision and management over the worker's tasks, schedule, discipline and working conditions, like in a traditional worker–employer relationship.

Scope of GRASP and application to subcontractors

As per the GRASP general rules, section 3.2, all subcontractors, visitors, and other persons entering the farm (operation) shall be informed about the producers' implementation of applicable labor laws, social compliance, and GRASP requirements.

However, subcontractors should only be subject to GRASP assessment if they impact (provide specific services) to the main farming activities related to production and produce in the scope of the producer's IFA certificate.

Other subcontractors may not be subject to the GRASP assessment unless the auditor detects the risk of a GRASP integrity issue. In this event, the auditor shall document the risk in the assessment report.

Subcontractors to be included in GRASP assessments

Any labor subcontractor that provides workers/labor to the producer to perform farm labor for the main farming activities on the premises of the producer's product handling unit or production site shall be included in the GRASP assessment.

When using services from labor subcontractors, producers are required to include the subcontracted workers/labor in their implementation of GRASP requirements as described below in the P&Cs.

Auditors shall pay special attention to the details of the contractual agreement between the producer and the labor subcontractors to identify situations where producers may be engaged in sham contracting. Any workers subjected to sham contracting shall be considered direct workers and fall under the producer's direct responsibility in the GRASP assessment.

Subcontractors to be excluded from the GRASP assessment

Subcontractors providing services or activities other than supplying workers/labor for the main farming activities are excluded from the GRASP assessment.

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

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

Obligation of producer with subcontractor excluded from the GRASP assessment

If the subcontractor’s services, tasks, or activities are excluded from the GRASP assessment and the presence of the subcontractor staff on the premises of the farm is required, the subcontractors’ staff shall be informed about relevant GRASP requirements as indicated in the GRASP general rules, section 3.2.

The producer shall inform that any violations of human rights or local laws (including forced labor, child labor, harassment, and non-compliance with local laws) are not tolerated on the farm by any commercial partner and that any non-compliance on these matters will be a cause to end the commercial relationship immediately.

The producer shall give the subcontractor or the subcontractor staff prior notice, warning, or information of this policy. This can be done by any means, so long as the objective of awareness is fulfilled.

The GRASP assessor shall check documented evidence (e.g., a document given to the subcontractor, the contract clause included) or notice at the entrance of the farm and at the visitor’s entrance (see GRASP P&C 4.4).

N°	Principle	Criteria	Level	Verification method
G	GENERAL			
G1	The producer informs the workers of the GRASP assessment and its scope at least two working days before the date of assessment.	<p>The term “inform” shall require the producer to include reference to the key areas of the standards.</p> <p>The term “GRASP scope” shall require the producer to provide workers with/remind workers of where to access the producer’s human rights policy and/or NIG. These requirements shall also cover any subcontracted labor. For family farms without hired workers, “workers” shall refer to core family members working on the farm.</p> <p>Exception: For unannounced assessments, this P&C shall be considered compliant.</p> <p>Evidence: The assessor shall check documental evidence and, where interviews are possible, cross-check such documental evidence with workers testimony of the workers and worker representation.</p>	Minor Must	Any kind of evidence of written/documented communication between the producer and the subcontractor. The producer was active enough to inform the subcontractor. Examples: email, fax, WhatsApp message, etc.
G2	The producer provides a register of any/all workers hired and those present on the date of the assessment.	<p>The register is only a reference to be used by the assessor and not to be kept. Once the assessment is completed, the assessor shall return the register to the producer without keeping copies.</p> <p>The register shall include all workers of the current (calendar/seasonal) year or at least those hired since the last assessment. Use of subcontracted labor, prison labor, and/or family labor shall be clearly indicated. For family farms without hired workers, “workers” shall refer to core family members working on the farm.</p> <p>Evidence: The register shall contain information (excepting information not legally allowed to be included) on the type of contract, migratory status, date of birth, date of hire, and date of dismissal, as applicable.</p>	Minor Must	Subcontracted labor needs to be included in both the register of all workers hired during the cycle and that of workers present on the day of the assessment. On these registers, subcontracted labor must be clearly indicated as such.

N°	Principle	Criteria	Level	Verification method
		<p>The producer shall provide verification of all workers present on the date of the assessment.</p>		
G3	<p>The producer/producer group completes a minimum of one self-assessment/internal GRASP assessment annually.</p>	<p>There shall be documented evidence available that a self-assessment/an internal GRASP assessment has been completed under the responsibility of the producer/producer group (this may be carried out by a person other than the producer). The self-assessment/internal GRASP assessment shall have been completed before the CB external assessment and during the time with the highest presence of workers at the farm and when agricultural activities are taking place. For family farms without hired workers, “workers” shall refer to core family members working on the farm.</p> <p>Evidence: Self-assessments/internal GRASP assessment shall include all applicable P&Cs, even if the relevant tasks are carried out by a subcontracted company/labor. The self-assessment/internal GRASP assessment checklist shall contain comments on the evidence observed for all non-applicable and non-compliant P&Cs.</p>	Major Must	<p>The self-assessment is crucial to the producer’s verification of subcontractor compliance (see GRASP general rules, section 6.1 c), “Self-assessment/Internal farm audits” and 6.2.1 e) “Assessment procedure for labor subcontractors”).</p> <p>No specific documentation related to the subcontractor is expected.</p> <p>It is the producer’s duty to conduct the self-assessment/internal assessment and apply these verification methods for subcontractors (this document).</p> <p>The CB assessor shall cross-check in this checklist how the producer assessed the subcontracted activity and evidence available for subcontracted activities in the GRASP scope for all applicable P&Cs.</p>

N°	Principle	Criteria	Level	Verification method
G4	Effective corrective actions are taken to address all non-compliant Major Musts and at least a percentage of Minor Musts detected during the self-assessment/internal GRASP assessment.	<p>Before or at the beginning of the assessment, any corrective actions shall be documented. The assessor shall include comments in the assessment report wherever deviations are found between the current assessment and the self-assessment/internal GRASP assessment.</p> <p>Evidence: Any changes necessary as part of the corrective actions shall have been implemented. Compliance is achieved when zero non-conformances are detected during the self-assessment/internal GRASP assessment or if all non-conformances detected during the self-assessment/internal GRASP assessment have been resolved before the CB assessment.</p>	Minor Must	<p>For subcontractors: The producer is responsible for communicating to the subcontractor the need to take corrective actions for non-compliant P&Cs related to the subcontracted labor. There must be documented evidence (see GRASP general rules, section 6.2.1 e) for definition of “seeking corrections”) of the producer’s communication to the subcontractor and evidence of the producer’s follow-up for the corrective action taken by the subcontractor. No compliance is possible unless the corrective action has been completed.</p>

N°	Principle	Criteria	Level	Verification method
1	RIGHT OF ASSOCIATION AND REPRESENTATION			
1.1	The producer respects the right of workers to join and/or form trade unions or other worker organizations of their choice (as well as the right to refrain from joining/forming such organizations) in accordance with applicable national legal requirements.	<p>This requirement shall include subcontracted labor while at the farm.</p> <p>The assessor shall be informed about the type of worker organizations recognized in the country and the applicable legal requirements.</p> <p>Evidence: The assessor shall check this information in worker interviews, if applicable. If no interviews are possible, the assessor shall cross-check this information through document review and interviews with the worker representation. Information on members of local trade unions, records of visits of trade union representatives, and/or contacts of trade union representatives, etc., shall be available at the production site with the worker representation.</p>	Major Must	No specific evidence related to the subcontractor is expected. It is the producer's responsibility to comply with this P&C and to communicate this right also to the subcontracted workers.
1.2	If the right to freedom of association and collective bargaining is absent, restricted, or denied under local law, the producer allows alternative forms of independent worker representation and negotiation that is free of employer control.	<p>This requirement shall include subcontracted labor while at the farm.</p> <p>Evidence: The assessor shall know about the type of worker organizations allowed and recognized in the country and check alternatives provided by the producer.</p>	Minor Must	No specific evidence related to the subcontractor is expected. It is the producer's responsibility to comply with this P&C and to communicate this right also to the subcontracted workers.

N°	Principle	Criteria	Level	Verification method
1.3	The producer does not discriminate or otherwise penalize worker representation, members of trade unions, or other worker organizations because of their membership in or affiliation with legally registered worker organizations.	<p>This requirement shall include subcontracted labor while at the farm. The assessor shall know about the worker organizations available locally.</p> <p>Evidence: The assessor shall check compliance with this P&C in interviews with the workers, where possible. If no interviews are possible, the assessor shall check compliance through document review (e.g., records of visits of trade union representatives, contacts of trade union representatives displayed at the production site). The assessor may contact organizations directly for information.</p>	Major Must	No specific evidence related to the subcontractor is expected. It is the producer's responsibility to comply with this P&C.
1.4	The producer allows any worker representation duly registered and duly recognized by the local law access to the workplace to carry out their representative functions in accordance with applicable national legal requirements.	<p>This requirement shall include subcontracted labor while at the farm. Evidence: The assessor shall check compliance with this P&C in interviews with the workers, where possible. If no interviews are possible, the assessor shall check compliance through document review (e.g., records of visits of trade union representatives, contacts of trade union representatives displayed at the production site). The assessor may contact organizations directly for information.</p>	Major Must	No specific evidence related to the subcontractor is expected. It is the producer's responsibility to comply with this P&C and keep records of visits of trade union representatives, as well as contact information of trade union representatives displayed at the production site available for subcontractors.

N°	Principle	Criteria	Level	Verification method
2	GRASP WORKER REPRESENTATION			
2.1	Current workers have decided on appropriate representation to help assess, communicate, and monitor their interests before the producer.	<p>Possible types of decision:</p> <ol style="list-style-type: none"> 1. Using the same form of representation as in the previous production cycle 2. Using the representative(s) of a trade union organization representing workers, works councils, or collective organizations (if legally possible) 3. Using a newly chosen form of representation 4. Deciding not to have collective representation <p>The representation can be:</p> <ul style="list-style-type: none"> - A person or group of persons - A representative of a collective labor organization legally active at the farm: a trade union representative, a delegate, work councils, or any other form operating legally - Any other form that provides opportunity to the workers to raise their voice (e.g., a documented, regularly repeated meeting organized and led by the workers to discuss issues) - A management GRASP liaison: <ol style="list-style-type: none"> a. If a producer only operates with subcontracted labor or b. If workers decide against all of the options above and individually self-represent before management, or c. If workers of producers with five or fewer workers during a production year decide not to have a collective representation, a written declaration shall be provided by the workers, and the producer (or supervisory staff) shall take the role of the GRASP liaison <p>The representation is appropriate if</p> <ul style="list-style-type: none"> - The decision has taken place in the ongoing year or production period and 	Major Must	<p>If the producer has only subcontracted labor, a management GRASP liaison is the only acceptable means of representation.</p> <p>The same evidentiary standards as for hired workers apply for subcontracted workers.</p> <p>The producer shall have evidence available to prove that they informed all new workers (including subcontracted labor) working on the farm of who the current representative is and what workers' options for representation are.</p>

N°	Principle	Criteria	Level	Verification method
		<p>- It consists of workers currently hired and present at the farm</p> <p>Evidence: The assessor shall check compliance with this P&C through document review and in interviews with the workers who participated in the decision process, where possible. If no interviews are possible, the assessor shall check compliance through document review.</p> <p>For collective organizations and work councils, the official appointment shall still be registered, current, and valid, and the official(s) shall be present or often present at the farm. The assessor shall check official registration (with the government or labor authorities) for the validity of the official appointment and may also contact the local organizations directly.</p> <p>When workers decide on self-representation, a management GRASP liaison shall be chosen by the producer. The producer shall keep a written declaration indicating relevant information regarding the worker decision to self-represent (names of participants, date, and details of decision, signed by all the workers involved in the decision). The assessor shall check documents and dates of the declaration. The assessor shall also verify during worker interviews that the decision not to have collective representation was reached without external influence on the workers.</p> <p>For producers with five or fewer workers during the production year, if the workers decide not to have collective representation, the assessor shall check the declaration and cross-check with interviews, where possible, that there was no external influence.</p> <p>For producers with only subcontracted labor, a management GRASP liaison shall be designated.</p> <p>For GRASP compliance <i>only</i>, a management GRASP liaison is always considered to have the duties of a worker representation.</p>		

N°	Principle	Criteria	Level	Verification method
2.2	After the workers reach a decision on the representation, the composition and type of the worker representation is communicated by management to the current workers.	<p>The term “communicated” shall require that information is always available in the predominant language(s) of the workforce and/or pictograms (especially for workers who cannot read), e.g., farm sign boards, handouts given directly to workers/subcontractors (evidence of accessibility of handouts shall be presented). Information to be communicated shall include names and whereabouts during working hours of the worker representation. Where applicable, the producer shall communicate the name and contact of the management GRASP liaison.</p> <p>If a producer operates only with subcontracted labor, a management GRASP liaison shall be designated.</p> <p>Evidence: The assessor shall check compliance with this P&C in interviews with the workers, where possible. If no interviews are possible, the assessor shall check compliance through document review.</p>	Major Must	Subcontracted labor shall be informed about the decision in the same way workers are. They can be informed by the direct employer, the producer, or through any other method that provides enough guarantee that the subcontracted workforce has information about who is their representative, where to find their representative, and their representative’s working hours.
2.3	The producer ensures that worker representation is decided during the time with the highest presence of workers at the farm.	<p>The term “highest presence” shall require that the decision process take place during the most recent peak season or harvest period. If most workers are not present at those times, the decision process shall at least take place during the time when the highest number of workers is present during activities registered under GLOBALG.A.P. Integrated Farm Assurance (IFA).</p> <p>The phrase “the producer ensures” shall cover, e.g., providing guidance, motivating workers, facilitating time and place during working hours, providing information on the role of representation, offering breaks without payment reduction, granting paid working time to participate in the meetings.</p>	Minor Must	Subcontracted labor shall also be included when considering the highest presence of workers on the farm.

N°	Principle	Criteria	Level	Verification method
		Evidence: The assessor shall check this information through worker interviews (interviewing those who participated), where possible. If no interviews are possible, the assessor shall check compliance with this P&C through document review and interviews with the worker representation.		
2.4	The worker representation/management liaison has been instructed on their role, duties, and rights within GRASP.	<p>The main role, duties, and rights shall include providing information on the complaint process to all workers, meeting with workers, sharing information from management, and facilitating contact with the different labor unions accessible to the workers and contact with the local labor authorities.</p> <p>Evidence: The assessor shall cross-check records and interviews with the worker representation and management liaison(s).</p>	Major Must	No specific evidence related to the subcontractor is expected. The management GRASP liaison/worker representation shall also include subcontracted labor under their responsibilities.
2.5	Workers, their representation, and the producer hold monthly gatherings on issues related to GRASP during the time with the highest presence of workers.	<p>The term “highest presence” of workers shall require that the gatherings take place during the most recent peak season or harvest period. If most workers are not present at those times, the gatherings shall take place at least once during the time when the highest number of workers is present during activities registered under IFA. If the highest presence of workers occurs during seven weeks or less, compliance with the requirement for monthly meetings can be met with one meeting during the seven weeks.</p> <p>For a management GRASP liaison, workers shall meet monthly with the management liaison.</p> <p>Gatherings may take the form of meetings or quick conversations where information is exchanged, provided workers can speak/ask freely. As conditions allow that the gatherings can take place in a single group, smaller groups, or one-to-one sessions.</p> <p>Discussion of issues related to GRASP shall include at least:</p>	Minor Must	Subcontracted labor shall also be included in the monthly gatherings and when considering the highest presence of workers on the farm.

N°	Principle	Criteria	Level	Verification method
		<ul style="list-style-type: none"> - Information on schedules, wages, changes in labor conditions, and any other working condition of interest to the workers - Information on the producer's human rights policy - The importance of the complaint process and how to use it - Important local contacts (e.g., governmental labor office or local labor authorities, local trade unions, ombudspersons, etc.) <p>Evidence: Documentation of the gatherings shall be available, and attendance shall be cross-checked with interviews, where possible. If no gathering was possible because there is no worker representation, compliance shall occur only when the producer has provided awareness of such a gathering. Documental evidence shall include, e.g., a notice with detailed information posted at convenient places where the workers can assess and read it in their native languages, a record of workers absent from the gatherings.</p>		
3	COMPLAINT PROCESS			
3.1	A confidential complaint process is available to be used by all workers free of any retaliation or penalty.	<p>The process shall be simple and available to all hired and/or subcontracted labor.</p> <p>The process shall be available in the predominant language(s) of the workforce and/or pictograms.</p> <p>The process shall also cover verbal complaints that can be sorted out immediately with a personal conversation/meeting conducted in a language understood by the worker.</p> <p>Evidence: The assessor shall check the availability of the process with worker interviews, where possible. If no interviews are possible, the assessor shall check compliance with this P&C through document review and interviews with the worker representation.</p>	Major Must	The procedure shall consider the language and characteristics of the subcontracted labor.

N°	Principle	Criteria	Level	Verification method
3.2	<p>The complaint process is implemented and appropriate to the number and type of workers for filing complaints in person, anonymously, or through the worker representation.</p>	<p>The term “implemented” shall require that the process be available in the predominant language(s) of the workforce and/or pictograms (especially for workers who cannot read), e.g., farm sign boards, handouts given directly to workers/subcontractors (evidence of accessibility of handouts shall be presented).</p> <p>The process shall indicate how and where to file the complaint information, time for resolution, who will answer, and a clear statement that the process will be confidential without prejudice to workers’ right to go to court and that there is no retaliation or penalty for using the process.</p> <p>Subcontracted labor shall have access to the complaint process. Their complaints can be 1) within the scope of the commercial contract (e.g., conditions or hours of work at the production site are not as indicated) or 2) outside of the scope of the commercial contract (e.g., direct employer does not provide good housing accommodation).</p> <p>The term “appropriate” shall require that the process provide any worker with possibilities to file and get an answer to the complaint in an appropriate time and in a confidential form. For short-term workers, the process shall provide shorter resolution times.</p> <p>Where personal conversations/meetings are an option for immediately resolving complaints, the meeting/conversation shall be conducted in a language understood by the worker and shall be documented.</p> <p>Evidence: The assessor shall use worker interviews, where possible, to check availability, communication, and implementation of the process for all workers and especially for short-term workers. If no</p>	Minor Must	<p>In the documented complaint process the producer shall consider and include subcontracted labor. Specific reference is included in the complaint process within and outside the commercial agreement, including information on the legal and official resources for denouncing rights violations outside the commercial contract (e.g., minimum wage paid by subcontractor and not the producer).</p>

N°	Principle	Criteria	Level	Verification method
		interviews are possible, the assessor shall check compliance with this P&C through document review and interviews with the worker representation.		
3.3	The worker representation has been instructed on how to use the process on behalf of other workers on the rights included in the producer's human rights policies.	<p>The term “instructed on” shall require describing to the worker representation how to use the process on behalf of the workers. The worker representation shall be made aware that the worker must authorize the worker representation to file a complaint on their behalf. The worker representation shall be made aware of the obligation to keep all the information confidential. If applicable, a document of the worker’s consent to have the worker representation act on their behalf shall be filed. When this representation is requested by the worker to protect the anonymity of the complainant, the process shall respect the request and continue without affecting the outcome. Where workers decide not to have a form of representation, workers shall be allowed to request help from other fellow workers. In these cases, the management GRASP liaison shall provide the information to the worker, person, or organization (independent from the producer) selected to support them in filing the complaint.</p> <p>Evidence: Documented evidence of the information given to the worker representation shall be available. The assessor shall use worker interviews (including the worker representation as applicable) to check how the complaint process was explained. If no interviews are possible, the assessor shall check compliance with this P&C through document review and interviews with the worker representation.</p>	Minor Must	The worker representation or management GRASP liaison shall also be instructed in how to use the process on behalf of the subcontracted workforce. The assessor shall check this during the interview with the worker representation or management GRASP liaison.

N°	Principle	Criteria	Level	Verification method
3.4	Easy-to-understand instructions are provided to all workers about the complaint process.	<p>The term “easy-to-understand” shall require that all communication be available in the predominant language(s) of the workforce. If workers cannot read, the producer shall provide alternatives (e.g., pictograms or the possibility of <i>ad hoc</i> verbal instructions). The instructions shall be well communicated, e.g., through displays on farm sign boards, handouts given directly to workers/subcontractors (evidence of accessibility of handouts shall be presented), contracts and worker documentation (evidence that workers/subcontractors received a copy of the document shall be presented), and electronic delivery (with proof of receipt by the worker/subcontractor). When instructions are posted, evidence shall show that the producer indicated clearly where to find the instructions.</p> <p>Any new worker shall be instructed in the complaint process. At minimum, the producer shall inform workers of the process during the first working instructions or during the first meeting with workers. Subcontracted workers shall receive these instructions and be entitled to file complaints.</p> <p>Evidence: The assessor shall check compliance with this P&C in interviews with the workers, where possible. If no interviews are possible, the assessor shall check compliance with this P&C through document review. The assessor shall check that the language of instruction is understood by the workers.</p>	Major Must	Instructions shall be provided in the predominant language(s) of the workforce, including the language(s) of subcontracted workers.

N°	Principle	Criteria	Level	Verification method
3.5	There are one or more well publicized places to file complaints, at least one of which should be independent of the supervisory staff.	<p>The place(s) to file complaints can be a location on the farm, a person/persons appointed to receive the complaints, or the worker representation, that workers can use, talk to, or ask to file a complaint. Any place to file a complaint shall provide an option to file anonymously.</p> <p>If workers are usually in the field with limited access to the farm buildings, one place to file a complaint shall be a designated person of the crew at the field.</p> <p>If there is worker representation, it should be notified of any complaint received, without breaking the confidentiality requirements (not sharing details).</p> <p>The term “well publicized” shall require that the information about the existence and functioning of the process is publicly available and accessible, including through channels aimed at those who may wish to use it. Also, it must be provided in the predominant language(s) of the workforce and/or pictograms (especially for workers who cannot read), e.g., farm sign boards, handouts given directly to workers/subcontractors (evidence of accessibility of handouts shall be presented). Workers shall be informed about at least one grievance channel independent of supervisory staff. For example, this could be the contact details of a governmental grievance mechanism, of a nongovernmental organization (NGO), or of another third-party organization that is known to support workers in the case of grievances.</p> <p>The term “supervisory staff” shall refer to any staff member in contact with workers or with supervising duties at the production site (e.g., foreman, manager, crew supervisor, etc.). If the producer does not have such staff, the producer shall have knowledge of the regulations. The term “independent of supervisory staff” shall indicate a place or a person/persons/organization independent from management (i.e.,</p>	Major Must	Special consideration shall be given to the predominant language(s) and education level(s) of the subcontracted workers.

N°	Principle	Criteria	Level	Verification method
		<p>phone number of an authority, NGO, or third-party organization), so that individuals with a complaint cannot be intimidated as if the company representative were the only sole point of contact. Here, the worker may drop or file and drop complaints.</p> <p>If there is worker representation, the producer shall inform the representative(s) of any complaints received or dropped, while maintaining the confidentiality of the process.</p> <p>Examples: On a site, a place out of sight of management staff at the farm eating/resting place.</p> <p>As person(s), the worker representation. The producer can additionally include a community representative or organization as another place to file complaints.</p> <p>Evidence: The assessor shall check compliance with this P&C in interviews with the workers, where possible. If no interviews are possible, the assessor shall check compliance through document review.</p>		
3.6	<p>The producer shall endeavor to resolve a complaint while the worker is under their employment, in a timely manner and proportionately to the nature of the complaint made.</p>	<p>The term “resolved” shall indicate a positive or negative answer, or no resolution with explanation of why there was no resolution. This requirement includes the complaints from subcontracted labor within the scope of the commercial contract.</p> <p>When complaints are anonymous, the answer shall be included as a general notice posted on workers notice boards or places without reference to any worker/subcontracted worker.</p> <p>For subcontracted labor complaints outside of the commercial contract (sole responsibility of the direct employer), the resolution shall provide the subcontracted worker with information on the legal and official resources for denouncing</p>	Minor Must	<p>For the scope of resolution for complaints outside the commercial contract with subcontractors, see GRASP general rules, section 6.2.1 d).</p>

N°	Principle	Criteria	Level	Verification method
		<p>rights violations (e.g., minimum wage paid by subcontractor and not the producer).</p> <p>The term “timely manner” shall require complaints to be resolved: For hired labor, in general at most 30 days after filing or before the last day of employment (if this is less than 30 days after filing). For subcontracted workers, 30 days after filing or before the last day of the contract (if this is less than 30 days after filing).</p> <p>If a complaint cannot be resolved during the time indicated, the reason for late resolution and evidence of resolution notification shall be documented for assessor review. Examples of documentation include proof that the resolution was included with the last paycheck, mailed within 30 days, or that no resolution was possible and the worker was notified of this.</p> <p>If there is worker representation, the producer shall notify the representative(s) about the complaints and outcomes.</p> <p>Evidence: The assessor shall check compliance with this P&C in interviews with the workers, where possible. If no interviews are possible, the assessor shall check compliance through document review and interviews with the worker representation and producer.</p>		

N°	Principle	Criteria	Level	Verification method
3.7	A summary record of any complaint over the past 24 months is kept to show that they have been received and addressed.	<p>The record shall include a summary report indicating which complaints were resolved, time of resolution, worker notification of the status, and final decision.</p> <p>If there are verbally filed complaints that have been resolved right away, the report shall indicate at least the issue or topic and the person resolving the complaint.</p> <p>Evidence: The assessor shall check compliance with this P&C in interviews with the workers, where possible. If no interviews are possible, the assessor shall check compliance through document review and interviews with the worker representation and producer. If the complaint process has not been used by workers, the assessor shall check whether information on nonretaliation and absence of penalties is clear among the workers. This shall be included in the GRASP report.</p>	Minor Must	For records involving complaints outside the commercial contract with subcontractors, see GRASP general rules, section 6.2.1 d), e).
4	PRODUCER'S HUMAN RIGHTS POLICIES			
4.1	The producer has and complies with a policy on the protection of human rights, acknowledging the rights in the ILO Core Labour Conventions and against any form of forced labor, corruption, corporal punishment, harassment or abuse, and discrimination and	<p>The producer's human rights policy shall indicate that, at minimum:</p> <ol style="list-style-type: none"> 1. The producer follows all local laws and regulations. 2. The producer respects the workers' rights included in the ILO Core Labour Conventions. 3. The producer commits to respecting human rights as indicated in the UN Guiding Principles on Business and Human Rights. 4. The producer avoids and does not engage in, support, or tolerate discrimination in employment practices. 5. The producer does not support or tolerate the use of or threats of corporal punishment, mental or physical coercion, bullying, harassment, or abuse of any kind. 6. The producer checks that no worker is held in debt bondage or 	Major Must	The producer shall consider subcontracted labor in their human rights policy where applicable. Once communicated, compliance in all scopes is expected from the subcontractor.

N°	Principle	Criteria	Level	Verification method
	<p>supporting good labor conditions, social practices, and human rights for all workers.</p>	<p>forced to work for an employer, labor recruiter, or other entity to pay off debt.</p> <p>7. The producer prohibits any involvement in any act of corruption, extortion, embezzlement, as well as in any form of bribery, whether directly or indirectly.</p> <p>For family farms without hired workers, “workers” shall refer to core family members working on the farm.</p> <ul style="list-style-type: none"> - The policy’s acknowledgement of the rights included in the ILO Core Labour Conventions shall explicitly include the following conventions and their accompanying recommendations (even if they have not been ratified by the government): 29 and 105 and Recommendation 35 (Forced and Bonded Labor), 87 (Freedom of Association), 98 (Right to Organize and Collective Bargaining), 100 and 111 and Recommendations 90 and 111 (Equal Remuneration for Male and Female Workers for Work of Equal Value; Discrimination in Employment and Occupation), 138 and Recommendation 146 (Minimum Age), 182 and Recommendation 190 (Worst Forms of Child Labor), 81 (Labor Inspection), 122 (Employment Policy). - The policy shall demonstrate an understanding that the UN Guiding Principles on Business and Human Rights refer to dignity, fairness, equality, respect, and independence. - The policy shall entitle any worker to file complaints on any violation of this declaration using a confidential complaint process without fear of retaliation and have those complaints resolved in a timely manner. - After communicating this policy, the producer shall expect full compliance with the same commitments from any agriculture labor subcontractor while being a business partner. - The producer shall accept that if a GRASP assessment verification shows any violation of this policy, this shall be considered a non-compliance with this P&C. 		

N°	Principle	Criteria	Level	Verification method
		<p>Evidence: The assessor shall verify the existence of the policy and shall check whether any non-compliance during assessment violates any of the above objectives. The assessor shall then comment and score those criteria as non-compliance in this P&C as well.</p> <p>For producer groups, the policy can be developed at group level, but compliance shall be checked at producer group member level.</p>		
4.2	All workers are communicated the contents of the producer's human rights policy.	<p>The term “communicated” shall require that information is always available in the predominant language(s) of the workforce and/or pictograms (especially for workers who cannot read), e.g., on farm sign boards, handouts given directly to workers/subcontractors (evidence of accessibility of handouts shall be presented).</p> <p>If contents are displayed, they shall be in a common area available to all workers (e.g., resting, eating, or changing areas, etc.), and have an indication where to file complaints.</p> <p>Evidence: The assessor shall use worker interviews, where applicable, to check how the human rights policy was communicated. If no interviews are possible, the assessor shall check compliance with this P&C through document review and interviews with the worker representation.</p> <p>For subcontractors present at the production site (or subcontracted workers, if the subcontractor is not present), the producer shall provide a copy of the producer's human rights policy and explain the possibility of denouncing violations by the business partner through the complaint process.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>	Major Must	Specific documentary evidence related to subcontracted labor is required in order to verify communication of the policy to the subcontracted workers. The assessor must see the required evidence/information from subcontracted workers. This may take the form of signatures after receiving the document or records of attending training.

N°	Principle	Criteria	Level	Verification method
4.3	All supervisory staff is informed about the contents of the producer's Human Rights policy.	<p>The term "informed" shall require that, e.g., all management staff are provided with a copy of the producer's human rights policy, or an explanation of the producer's human rights policy is included in the induction process of any new management staff member.</p> <p>The term "contents" shall involve, e.g., an explanation of the different rights included and an explanation of the complaint process to denounce any violation to those rights.</p> <p>The term "supervisory staff" shall refer to any staff member in contact with workers or with supervising duties at the production site (i.e., foreman, manager, crew supervisor, etc.). If the producer does not have such staff, the producer shall have knowledge of the GRASP criteria on this topic.</p> <p>If a producer operates only with subcontracted labor, a management GRASP liaison shall be informed.</p> <p>Evidence: Information shall be documented, and cross-checked evidence shall be required (e.g., signature acknowledging receipt of copy, management staff testimony, etc.).</p>	Minor Must	
4.4	The producer communicates the producer's human rights policy to any labor subcontractor. Other subcontractors and visitors are communicated when visiting the farm.	<p>This communication shall occur before contracting with the business partner and shall be documented.</p> <p>For Option 2, communication can be managed and communicated at quality management system (QMS) level but shall be documented at producer group member and subcontractor level.</p> <p>There shall be documental evidence that the policy was communicated and that it was acknowledged. The assessor shall inspect this documental evidence (e.g., a signed document acknowledging policies, communication in contracts, etc.).</p> <p>For subcontractors present at the production site (or subcontracted workers, if the subcontractor is not present), the</p>	Major Must	<p>For elements of communication for visitors and other subcontractors different from labor subcontractors, see GRASP general rules, section 6.2.2.</p> <p>Specific documentary evidence related to subcontracted labor is required in order to verify communication.</p>

N°	Principle	Criteria	Level	Verification method
		<p>producer shall provide a copy of its human rights policy explaining the possibility of filing complaints through the farm complaint process.</p> <p>For visitors and other subcontractors visiting the producer’s site, the producer shall communicate its zero-tolerance policy with regards to non-compliances with its human rights policy and local laws while on the farm. Monitoring this is a duty of the producer.</p> <p>Evidence: The assessor shall use document review and an interview with the producer to check how the human rights policy was communicated. The assessor shall check the communication means to visitors and other subcontractors. The assessor evaluates monitoring system for visitors and other subcontractors.</p>		
4.5	The human rights policy is reviewed every three years, or when there is a change to labor legislation, or a change in GRASP, whichever occurs soonest.	<p>For review every three years, the assessor shall check if changes to the labor legislation regulating the policies in the producer’s human rights policy have occurred.</p> <p>For revision after a GRASP NIG update, the assessor shall check for changes in the NIG that affect the producer’s human rights policies.</p> <p>For Option 2 producer groups, the contents shall be reviewed at QMS level every three years, or earlier if necessary.</p> <p>Evidence: The assessor shall check the date of the review and any changes included. These changes shall be reflected in the documents and the displayed information.</p>	Minor Must	During the review, the producer shall consider whether subcontracted labor is hired.

N°	Principle	Criteria	Level	Verification method
5	ACCESS TO LABOR REGULATION INFORMATION			
5.1	The workers and the worker representation are provided with easy-to-understand and up-to-date information on minimum wage, working hours, breaks, maternity and sick leave, harassment and discrimination, freedom of association, holidays, labor unions, and local labor authorities contacts.	<p>The information shall also be available to all subcontracted labor. The term “easy-to-understand” shall require that accessibility and instruction to access is provided if needed. E.g., if access is provided electronically, a device such as a computer shall be always connected and available, and workers shall have received instructions on how to operate the device. If written information such as NIGs or pictogram information is displayed, the information shall be available in the predominant language(s) of the workforce.</p> <p>The term “up-to-date” shall require that information is from the latest valid and applicable regulation on the topics of the criteria.</p> <p>Evidence: The assessor shall use worker interviews, where possible, to check how the information was provided. If no interviews are possible, the assessor shall check compliance with this P&C through document review and interviews with the worker representation. The assessor shall be provided with the relevant documents or pictograms and check that they are always accessible to workers and subcontracted labor (e.g., information is displayed in common resting areas of workers).</p>	Major Must	No specific evidence related to the subcontractor is expected. The producer is responsible for implementing this P&C independently if the workers are directly employed or subcontracted.
5.2	Taking into consideration any differences between national and local legislation and GRASP, the producer always applies the higher level of protection to workers.	<p>The term “higher level of protection” shall refer to the regulation which provides better protection or benefits to the worker.</p> <p>Evidence: The assessor shall be presented with the evidence of GRASP application or the evidence of law infringement. In both cases, a report shall be included to be communicated to GLOBALG.A.P. directly.</p>	Major Must	

N°	Principle	Criteria	Level	Verification method
6	TERMS OF EMPLOYMENT DOCUMENTS AND FORCED LABOR INDICATORS			
6.1	All workers are legally eligible to work at the production site and on the activities assigned.	<p>For each worker, the producer shall have information on their legal eligibility to work and a verification process or method to assess this eligibility including, e.g., working permits (when required for nonnationals), legal minimum age of employment (for young workers), parental consent for workers at legal minimum age of employment (when required by law), residency permits, working cards, or other documents with relevant information.</p> <p>For family farms without hired workers, “workers” shall refer to core family members working on the farm.</p> <p>Any ID, permit, or document to verify this condition shall always be returned to the worker immediately.</p> <p>For subcontracted agricultural labor, the producer shall have requested a list of workers indicating that each worker’s eligibility was checked by the direct employer (e.g., by permit, by passport, by ID, etc.).</p> <p>Evidence: The assessor shall check the validity of the evidence used and cross-check with the worker in the interview where possible. If no interviews are possible, the assessor shall check the relevant documents. If the verification process is not documented, a detailed verbal explanation by the producer shall be required, together with some documental evidence.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>	Major Must	For subcontracted labor verified by the direct employer, the types of documents verified need to be indicated in the list of workers provided by the direct employer to the producer.

N°	Principle	Criteria	Level	Verification method
6.2	<p>All workers have entered work voluntarily and freely:</p> <ul style="list-style-type: none"> - Without being pressured, forced, or intimidated - Without being required to pay (directly or indirectly) a fee or related cost for being recruited, or making monetary deposits, financial guarantees, or deposits of personal possessions to be employed - Understanding and freely agreeing to the employment terms and conditions document 	<p>Details of the hiring procedure (documental or verbal) at the production site shall be provided indicating when the acceptance of work happens and by whom.</p> <p>If prison labor is used, there shall be evidence that all labor was performed voluntarily, i.e., each worker shall receive and sign a standardized consent form from the producer indicating that they agree to work. The form shall indicate the wages and conditions of work. The producer shall offer working conditions similar to working outside the prison.</p> <p>If family members of the worker have been hired, the assessor shall check that the family members (worker's spouse, children, or any other family members) have been separately and voluntarily contracted.</p> <p>The term "debt bondage" shall refer to a debt which can never be paid due to the conditions, terms, and circumstances of the debt.</p> <p>In the case of subcontracted labor, where legislation allows subcontractors to charge fees, these may not lead to situations of forced or compulsory labor (i.e., debt bondage or forced labor), and the producer shall request documental information directly from the direct employer and their subcontracted labor about this P&C. If non-compliance is found, the producer shall document each instance and the corrective actions taken.</p> <p>Evidence: The assessor shall check any contracting agreement about recruitment fees or provision in exchange of money or wages for food, shelter, or other services about wages, requesting a statement of any outstanding debts and record of payments by the workers. This information shall be cross-checked with interviews where possible. Signatures and identity of workers shall be cross-checked according</p>	Major Must	<p>The direct employer shall provide the producer with documentation that is similar to the evidence required for hired workers during the CB assessment. The subcontractor (the direct employer) shall provide this evidence to the producer before the CB assessment.</p> <p>Among other documents, this documentation shall include a description of the hiring procedure and a declaration that if any fees are charged, these are in line with local legislation and do not lead to debt bondage.</p> <p>For corrective actions, see GRASP general rules, section 6.2.1 d).</p>

N°	Principle	Criteria	Level	Verification method
		<p>to GRASP document sampling rules and with interviews where possible.</p> <p>Aspects to consider when cross-checking with interviews: unfulfilled promises on working conditions, contract substitution, promising more than what was delivered, contract in a language the worker does not understand or speak, contract or its content never shown to worker.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>		
6.3	<p>All contracted employment agencies and labor subcontractors are legally authorized to operate and/or registered with labor authorities when such registration exists.</p>	<p>The term “contracted” shall include all organizations used by the producer during the year before (or since the last) assessment. The term “registration” includes basic legal permits and official business registration from government authorities to operate as a legal entity, individual subcontractor, or business. The producer shall have in place a verification process or method for checking the registration of employment agencies and subcontractors used (e.g., checking the license, business registration, permits, and registration documents where available, etc.).</p> <p>The producer shall keep copies of the verification resources (e.g., documents, copies, certification, etc.).</p> <p>Evidence: The assessor shall check the validity of the verification resources used and cross-check with the contract signed with the employment agencies and/or subcontractors and producer interview.</p>	Major Must	

N°	Principle	Criteria	Level	Verification method
6.4	<p>For each worker, a document with the employment terms and conditions is available and has existed from the moment the employment relationship started.</p>	<p>The term “document with the employment terms and conditions” shall indicate a record in writing, such as a contract, letter of employment, short agreements, or any other type of record that provides details of the employment term agreements. The evidence may consist of several documents with the information.</p> <p>For compliance, it is required that:</p> <ul style="list-style-type: none"> - Documents shall be understood by workers (i.e., available in the predominant language(s) of the workforce, or with proof showing that workers understood the document). - The worker shall have a copy and/or these documents shall be accessible. - Documents shall include a date of acceptance of the agreement and the employment starting date. - If written, the agreement shall be signed and dated by the worker. <p>For subcontracted labor, there shall be a <u>document from the producer for subcontractors</u> and/or <u>employment agency workers instructing the subcontracted laborer about the scope and conditions of the work, detailing the (applicable) information. This document shall be available in the predominant language(s) of the subcontracted workforce and/or pictograms. The direct employer (subcontractor) shall provide the producer with a <u>summary (document) of the terms of employment used. Information considered confidential shall be described in general terms (e.g., wages or bonuses shall be described as hourly rates or at least indicating the minimum wage payment).</u></u></p> <p>There shall be a terms and conditions document if prison labor is used.</p> <p>There shall be separate terms and conditions documents when family members or workers are also hired.</p>	Major Must	<p>The assessor shall look for two documents:</p> <ol style="list-style-type: none"> 1) From the producer: A general document for subcontractors, instructing the subcontracted laborer about the scope and conditions of the work, available in the predominant language(s) of the subcontracted workforce and/or pictograms. This document can be distributed to the workers either by the producer or by the subcontractor. 2) A document (summary) with the terms of employment between the direct employer and the subcontracted workers (see P&C 6.6 in this document) shall be available. Included in the document shall be a written declaration from the subcontractor that the employment terms and conditions have been communicated to the subcontracted workers. The document shall declare that the minimum wage is being fulfilled.

N°	Principle	Criteria	Level	Verification method
		<p>Evidence: The assessor shall check the validity of the records used and cross-check with the worker in the interview, where possible. If no interviews are possible, the assessor shall check compliance with this P&C through document review.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>		<p>The GRASP assessor shall cross-check during the interviews (where required) with subcontracted workers that they have signed a document with the employment terms and conditions with their direct employer.</p> <p>There is no requirement for the subcontractor to share the original contracts/copies of the contracts the subcontractor signs with the subcontracted labor, but rather a template, summary, or similar.</p>
6.5	<p>Information on the worker's full name, nationality, and date of birth is verified by the employer before hiring and has been correctly included in the worker's terms and conditions documents.</p>	<p>There shall be a verification process or method for the information included in the workers' terms and conditions documents (e.g., check of worker ID, working permit, working registration card, trade union membership card, etc., with a copy kept on file) to verify the information for all workers, including very short-term workers.</p> <p>For subcontracted labor, the information shall be included in the register (list of those working at the production site) provided to the assessor.</p> <p>Evidence: During worker interviews, the assessor shall cross-check the contents of the documents directly with the worker's testimony and the verification process of the producer. The information included in</p>	Major Must	<p>For subcontracted labor, the information shall be included in the register (see P&C 6.1 in this document) provided by the direct employer to the producer.</p>

N°	Principle	Criteria	Level	Verification method
		<p>the document shall be complete and correct. If no interviews are possible, the assessor shall check compliance through document review.</p> <p>If the verification process is not documented, a detailed verbal explanation by the producer of the verification together with documental evidence shall be presented.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>		
6.6	<p>The employment terms and conditions documents include up-to-date information on the period of employment, contract type, a basic job description, wages, payments, working hours, breaks, holidays, and information on maternity or sick leave applicable by law.</p>	<p>The term “up to date” shall require a record of employment changes (changes in hours, type of activity, wages, location, housing, transport, basic information on holidays and maternity leave rights or sick leave, etc.) that will apply.</p> <p>If the worker lives in on-site housing arrangements, the document shall clearly indicate the weekly days off and/or weekly work shifts.</p> <p>The term “contract type” shall refer to the distinction between permanent, seasonal, period or day laborer, or subcontracted employment.</p> <p>The term “wages” shall require including a clear calculation of wages (i.e., inclusive of new forms of shift work, average of hours worked, flex-time arrangements, compressed work weeks, on-call work, along with extended or even 24/7 availability), and final rate to be paid shall also be included in the employment terms and conditions.</p> <p>For subcontracted labor, the direct subcontractor employer shall provide a summary (document) of the terms of employment. Information considered confidential shall be described in general terms (i.e., wages or bonuses shall be described as hourly rates or at least indicating payment of the minimum wage).</p>	Minor Must	<p>During the interviews (where required), the assessor shall cross-check whether subcontracted workers’ terms of employment on the period of employment, contract type, basic job description, wages, payments, working hours, breaks, holidays, and maternity or sick leave applicable by law are being fulfilled.</p> <p>In the terms of employment document as described in P&C 6.4 clause 2 of this document, the assessor shall find information on the period of employment, contract type, basic job description, wages, payments, working hours,</p>

N°	Principle	Criteria	Level	Verification method
		<p>Evidence: During worker interviews, the assessor shall cross-check the contents of the documents directly with the worker's testimony and the verification process of the producer. The information included in the document shall be complete and correct. If no interviews are possible, the assessor shall check compliance through document review.</p> <p>The assessor shall report details on minimum wage, working hours, and maximum weekly working hours.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>		breaks, holidays, and maternity or sick leave.
6.7	The employment terms and conditions in the document comply with national legislation and collective bargaining agreements.	<p>For subcontractors, the direct employer terms and conditions shall comply with the national laws independent of the place of hiring or nationality of the workers, and the producer shall be provided with a summary of those terms to be checked.</p> <p>Evidence: The assessor shall check compliance of the details in the document with the local laws in the national interpretation guideline and of the document sample with information from national regulations. Information shall be cross-checked with interviews where possible. If no interviews are possible, the assessor shall check compliance through document review.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>	Major Must	In the terms of employment document as described in P&C 6.4 clause 2 of this document, the assessor shall verify that the employment conditions are in line with national legislation and collective bargaining agreements.

N°	Principle	Criteria	Level	Verification method
6.8	Changes to the employment terms document have been recorded, communicated, and accepted by the worker.	<p>The term “changes” shall cover any modification to the original terms including period of employment, contract type (i.e., permanent, period or day laborer, etc.), wages, working hours, breaks, and the basic job description.</p> <p>The term “communicated” shall require documental evidence of agreement to all changes, e.g., document change is signed and dated by the worker, annex with a summary of changes with dates and with the worker’s signature and date.</p> <p>The term “recorded” shall require all changes to be included in the employment terms document or other documents accessible to the worker.</p> <p>For subcontractors, the direct employer shall communicate any changes during the term of the commercial contract to the producer. If there is no communication of changes or if there is incomplete communication, these are considered non-compliances. If non-compliance is found by the producer, the producer shall document each instance including corrective steps taken.</p> <p>If there is evidence of no changes from workers or subcontracted labor, compliance with this P&C has been achieved.</p> <p>Evidence: The assessor shall use interviews, where possible, to check if the changes are communicated to the workers and how are they communicated. If no interviews are possible, the assessor shall check compliance through document review.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>	Major Must	During interviews with subcontracted labor (where required), the assessor shall cross-check whether the changes are communicated to the subcontracted workers and how these changes are communicated.

N°	Principle	Criteria	Level	Verification method
6.9	The employment terms and conditions document together with other relevant documents of the workers hired during the previous and current production cycles are accessible to workers.	<p>Compliance with this P&C shall require:</p> <ul style="list-style-type: none"> - Availability of the copies at assessment - Access of the current workers to the information at any time during the work schedule <p>For subcontracted labor, the register of workers and the direct employer's document declaring compliance with the producer's human rights policy shall be available at the production site.</p> <p>Evidence: The assessor shall check the accessibility of information by workers and cross-check with the workers in the interview, where possible. If no interviews are possible, the assessor shall check documents or evidence from the producer.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>	Minor Must	Where possible, the assessor shall check during interviews with subcontracted labor whether subcontracted workers have access to the terms of employment and other relevant documents when needed.

N°	Principle	Criteria	Level	Verification method
7	PAYMENTS			
7.1	<p>Payments to workers are made in accordance with the worker terms and conditions documents.</p>	<p>Records of payments correspond with the terms of employment on:</p> <ul style="list-style-type: none"> - Dates/Intervals of payments - Type of payment notification used (e.g., text message, email, announcement, etc.) - Amount of payments - Method of payments (e.g., bank transfer, cash, etc.) <p>For agencies or subcontracted labor, the worker's commercial contract shall indicate summary information of subcontracted labor payment details.</p> <p>Evidence: The assessor shall use worker interviews, where possible, to cross-check documents of payment and compliance with the agreed worker's terms and conditions documents. The assessor shall request and check subcontracted labor information on this P&C.</p>	Major Must	<p>The document (summary) of the terms of employment described in P&C 6.4 of this document shall include information about the payment details (dates/intervals of payments, type of payment notification, amounts and method of payment).</p> <p>The GRASP assessor shall conduct interviews with the subcontracted workers during the GRASP assessment (where required) to verify that payments are made in accordance with the above-mentioned document (the summary of terms of employment).</p> <p>If interviews are not possible, the GRASP assessor shall cross-check this information with the evidence in the internal GRASP assessment checklists and with the worker representation/ management GRASP liaison.</p> <p>There is no requirement for the subcontractor to share the</p>

N°	Principle	Criteria	Level	Verification method
				<p>original contracts/copies of the contracts the subcontractor signs with the subcontracted labor, but rather a template, summary, or similar.</p>
7.2	<p>The workers are notified about when payments are made.</p>	<p>The term “notified” shall include the producer making general announcements that payments will be made, and there shall be information in the common rest areas of workers, email, telephone messages, etc., in the predominant language(s) of the workforce and/or pictograms.</p> <p>Evidence: The assessor shall use documents, displays, and, where possible, cross-check with interviews to check whether notification has taken place. The assessor shall request and check subcontracted labor information on this P&C.</p>	<p>Minor Must</p>	<p>The document described in P&C 6.4 of this document shall include information about the way subcontracted workers are notified of the payments by their direct employer.</p> <p>Where possible, the GRASP assessor shall cross-check this information during interviews with subcontracted workers.</p>
7.3	<p>The record of payment information is accessible to current workers and kept on file for at least 24 months.</p>	<p>The term “accessible” shall require that the worker can look at the personal payment information at the production site, or that it is provided by the producer when requested.</p> <p>Evidence: The assessor shall check that workers have access to the payment information and that records are kept on file for at least 24 months.</p>	<p>Minor Must</p>	<p>The subcontractor shall have records of payment information accessible to current workers and shall keep the files for at least 24 months.</p> <p>During the CB audit the producer shall have a written declaration from all subcontractors indicating that such records are kept for at</p>

N°	Principle	Criteria	Level	Verification method
				<p>least 24 months, are available to current workers, and will be shared with the producer only after justified request.</p> <p>It is the producer's responsibility to include this clause in the commercial contract with the subcontractor (see P&C 6.4 of this document).</p>
8	WAGES			
8.1	<p>Pay slips or registers show the amount of working time (including overtime) or harvest amount and the wages and/or overtime paid.</p>	<p>Compliance with this P&C shall require all of the following proven by evidence:</p> <ol style="list-style-type: none"> 1. Amount paid for regular time and overtime 2. Regular working time/harvest amount/any other figure used for payment calculation 3. Summary of overtime hours on top of regular working time <p>Written pay slips shall be maintained for all current workers and available upon request for the pay period concerned each time that workers are paid.</p> <p>For agency or subcontracted workers, the direct employer shall provide the producer with a copy of a sample pay slip to be kept for assessment purposes.</p> <p>Evidence: The assessor shall check the existence of the records. Where possible, the assessor shall cross-check the contents of the sample in interviews.</p>	Minor Must	<p>A copy or copies of a template pay slip of a subcontracted worker shall be kept for assessment purposes.</p> <p>Name and personal information of the subcontracted worker can be omitted and used only as an example of real pay slips that the subcontractors issue for their workers. This example pay slip should provide evidence that, as for regular workers, information on the regular hours and the extra hours worked is given.</p>

N°	Principle	Criteria	Level	Verification method
		<p>The assessor shall request and check subcontracted labor information on this P&C.</p>		
8.2	<p>Wages, payments, number of hours, government social security/pension contributions, and payroll taxes in the pay slip comply with the employment terms and conditions, with national labor regulations, and/or with collective bargaining agreements.</p>	<p>The assessor shall check the following information in the sample pay slips:</p> <ol style="list-style-type: none"> 1. Social security payments/Pension contributions 2. Payroll taxes 3. Wages/Payments (at least minimum wage) <p>Compliance with this P&C shall require all items to be correct (verification in pay slips and agreement with terms documents and labor regulations) following the document sampling rules.</p> <p>Evidence: The assessor shall check compliance with this P&C through document review and cross-check with interviews where possible.</p>	Major Must	<p>The example/copy of the pay slip from the subcontractor shall provide evidence of:</p> <ol style="list-style-type: none"> 1. Social security payments/Pension contributions 2. Payroll taxes 3. Wages/Payments (at least minimum wage)
8.3	<p>All workers earn at least the national minimum wage and/or the collective bargain agreement wage within regular working hours.</p>	<p>When worker wages are calculated per piece, quota, or unit, this system shall record that minimum wage and/or the collective bargaining agreement wage is obtained within regular working hours. All workers, regardless of their gender, citizenship, or migrant status, shall receive the same remuneration for equal jobs and qualification even when remuneration is above minimum wage.</p> <p>The assessor shall check the number of regular hours (not including overtime) and minimum wage.</p> <p>For agency or subcontracted workers, the assessor shall verify information on terms of employment with workers, where possible. If non-compliance is found, the producer shall document each instance, including corrective steps taken.</p>	Major Must	<p>The terms of employment document (P&C 6.4 of this document) shall include general information about the remuneration received by the workers per unit of work (hour, piece, quota). At least the national minimum wage and/or the collective bargaining agreement wage (whichever is higher) shall be achieved within regular working hours.</p>

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		<p>Evidence: The assessor shall check compliance with this P&C through document review and cross-check with interviews where possible. If no interviews are possible, effective bank records, payroll records, tax records, or documents with the information shall be provided to the assessor to determine compliance.</p> <p>The assessor shall include detailed reference to the minimum wage, wages by collective bargaining agreement, and regulations on working hours in the comments of the report compared with the evidence found.</p> <p>The assessor shall check and report that workers with different gender, citizenship, or migrant status received the same remuneration for equal jobs or qualifications even when remuneration is above the minimum wage.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>		<p>The example/copy of the pay slip from the subcontractor shall provide evidence that workers earn at least the national minimum wage and/or the collective bargaining agreement wage (whichever is higher) within regular working hours.</p> <p>Where possible, the GRASP assessor shall cross-check this information during interviews with the subcontracted workers.</p>
8.4	<p>Any deductions from salaries are included in the pay slip and are legally justified in writing, clearly explained, and accepted by the worker in files.</p>	<p>Pay slips shall include deduction information. There shall be records explaining the deductions.</p> <p>In the case of prior loans and advances, deductions from wages made for their repayment shall not exceed the limits prescribed by national law. Workers shall be duly informed of the terms and conditions for granting and repayment of advances and loans.</p> <p>In the case of recruitment fees, no fees or costs incurred in the recruitment process for workers to secure employment or placement shall be allowed, regardless of the manner, timing, or location in which such fees are imposed or collected, including up-front payments workers have had to make to their recruitment agency or their employer.</p>	Major Must	<p>The document (summary) of the terms of employment shall include a description of any possible deductions from wages (advances, food, shelter) and a declaration from the subcontractor that if there are any deductions, they will be included and justified in the pay slips.</p> <p>Where posing, during the interviews the GRASP assessor shall cross-check with</p>

N°	Principle	Criteria	Level	Verification method
		<p>Evidence: The assessor shall check compliance with this P&C through document review, cross-checked with interviews where possible. If basic needs like shelter, food, and/or water are paid for by the worker to the producer, the assessor shall request a statement of any standing debt and payments to monitor potential debt bondage. The assessor shall verify that, if deducted from worker income or paid directly by the worker to the employer, costs for basic needs (food, shelter, water, transportation to the workplace) are not excessive, i.e., that they are in line with the usual market prices for said items. If deductions are reported, the assessor shall verify with the producer the deductions and reasoning. The assessor shall cross-check the producer's statements in the worker interview where possible.</p>		<p>subcontracted workers whether there have been any deductions and whether they have been included in the pay slips and clearly justified.</p> <p>If the subcontractor applied deductions, the example/copy of the pay slip shared by the subcontractor shall include a field for the deduction.</p>
9	WORKING AGE, CHILD LABOR, AND YOUNG WORKERS			
9.1	<p>The producer verifies that no worker below the legal minimum age of employment or the age of completion of compulsory education (whichever provides the highest protection) is working at the production sites. The minimum age of employment shall not be less than 15 years and 13 for light work. For countries exempt</p>	<p>The term “verifies” requires that the producer shall have a verification process or method for checking this information about the workers, including employment agency/subcontracted workers (e.g., checking worker ID, working permit, working registration card, trade union membership card, etc.) and filing a copy. A verbal explanation of the verification process or method shall be sufficient together with documental evidence.</p> <p>For family farms without hired workers, “workers” shall refer to core family members working on the farm.</p> <p>The “production site” shall include any site within the scope of the GRASP assessment and IFA or equivalent standard audit.</p> <p>For service providers or short-term visitors providing production-related activities as defined by IFA, the producer shall verify company ID, personal ID, working permit, working registration card, picture ID when available, etc.</p>	Major Must	<p>For subcontracted labor, this information shall be available in the list of workers as required in P&C 6.1 of this document. The producer shall have requested a list of workers indicating that each worker's eligibility was checked by the direct employer (e.g., by permit, by passport, by ID, etc.). The absence of a terms of employment document does not eliminate the obligation to comply with this P&C.</p>

N°	Principle	Criteria	Level	Verification method
	<p>from ILO Convention 138, the minimum age of employment shall not be less than 14 and 12 for light work.</p>	<p>The producer shall apply the verification procedure to any person providing work, services, or any activity related to production at the production site or subcontracted sites. The absence of a terms of employment document does not eliminate the obligation to comply with this P&C. In these cases, the producer shall ensure that no persons below the legal minimum age of employment are involved in any working activity unless those allowed to family members in family core business farms.</p> <p>“Light work”: age-appropriate tasks that are of lower risk and do not interfere with a child’s schooling and leisure time and do not adversely impact health, safety, and development of the minor.</p> <p>If the age of completion of compulsory education is higher than the legal minimum age of employment, the assessor shall check that the work tasks do not interfere with schooling (e.g., minors are enrolled in and attend school, work schedules allow getting to school, teachers are available at the farm, etc.).</p> <p>Any official school/university, government, industry, or trade union program that supervises development of apprenticeships (e.g., traineeship, internship, workplace learning, etc.) shall be documented. Documentation shall include at least the participants’ names, ages, conditions, hours, and parental consents.</p> <p>Evidence: The assessor shall check the validity of the documental evidence (producer shall provide documents, procedures, and official regulations during assessment) and cross-check with the relevant worker in the interview where possible.</p> <p>If no interviews are possible, the assessor shall use document review to check compliance with this P&C. If the verification process is not documented, a detailed verbal explanation by the producer shall be required, together with some documental evidence.</p>		

N°	Principle	Criteria	Level	Verification method
		<p>The assessor shall check applicable national interpretation guidelines for the age of compulsory schooling completion and the legal minimum age of employment in the country or find information before the assessment, including defined exceptions in the local laws different from the final minimum age established in the criteria and ILO Conventions.</p> <p>The assessor shall comment findings in the report, indicating data used as the legal minimum age of employment and age of workers, to confirm these criteria.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>		
9.2	<p>The producer checks that no worker under the age of 18 is engaged in night work or tasks that are hazardous in nature in any production site.</p>	<p>The term “checks” requires that the producer shall identify all workers below the age of 18 and verify that their tasks are not performed at night and are not of a hazardous nature.</p> <p>For family farms without hired workers, “workers” shall refer to core family members working on the farm.</p> <p>“Light work”: age-appropriate tasks that are of lower risk and do not interfere with a child’s schooling and leisure time and do not adversely impact health, safety, and development of the minor.</p> <p>The assessor shall check the age of completion of compulsory education.</p> <p>Evidence: Compliance shall be granted when the assessor has verified that there is no worker below the age of 18. The producer shall provide documents, procedures, and official regulations for review by the assessor.</p> <p>If not indicated in the NIG or by local law, hazardous conditions are those defined as such in the ILO Convention, or any conditions that could be dangerous to the young workers’ health and safety according</p>	Major Must	<p>The monitoring of subcontracted workers’ activities, including workers below the age of 18, can be the responsibility of the producer or of the direct employer. Either way, the producer shall be able to demonstrate compliance, for example with a copy of records of working hours and type of activity conducted.</p> <p>The producer can either keep this information for the subcontracted labor or can ask for verification from the direct employer.</p>

N°	Principle	Criteria	Level	Verification method
		<p>to the applicable IFA topic “workers’ well-being” or local regulations. Also considered hazardous are any conditions that jeopardize young workers’ development or prevent them from finishing their compulsory school education.</p> <p>Evidence shall include the record of working hours, which should be confirmed by the workers interview, including the confirmation of the nonhazardous nature of the work during the worker interview, where possible, and employment contract review.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>		
9.3	<p>Children on family farms shall be employed only by their core family under conditions that support their protection, right to education, and safety.</p>	<p>The term “conditions that support their protection, right to education, and safety” is defined as follows: Persons below the legal minimum age of employment working on their family’s farm, shall at least work under the following conditions:</p> <ol style="list-style-type: none"> 1. The minors are under direct supervision of their parents or guardians. 2. Their work is done on their own family farms. 3. The work tasks do not interfere with schooling (i.e., minors are enrolled in and attend school). 4. The work is not at night or hazardous in nature. 5. The work consists of age-appropriate tasks that are of lower risk. 6. The hours of work are monitored (reported) to be less than those of workers at or above the legal working age, including hours spent in household chores (e.g., cleaning, cooking, childcare, collecting water and firewood). 7. Parents or guardians declare these conditions in a written self-statement, which is kept on file by the producer and that must be reviewed and cross-checked on site during GRASP assessment. 	Major Must	<p>For subcontractors, the assessor shall check that no children are working on the farm other than those who are part of the producer’s core family. Cross-check with P&C 9.1 of this document.</p>

N°	Principle	Criteria	Level	Verification method
		<p>Evidence: Compliance shall be granted if the assessor has verified that no children (minors under the legal minimum age of employment) are employed or living at the farm. The assessor shall check that no children worked at the farm.</p> <p>Not accepted only with the indication of the producer. The assessor shall check each of the above conditions with the producer and provide comments in each of them when children are workers.</p> <p>For Option 2 producer groups, these conditions shall be monitored as a procedure in the GRASP QMS audit and evaluated in the internal GRASP assessment. The producer shall show the results of each of the procedures above to the assessor.</p> <p>If not defined in the NIG or by local law, hazardous conditions are those defined as such in the ILO Convention, or any conditions that could be dangerous to the young workers' health and safety according to the applicable IFA topic "workers' well-being" or local regulations. Also considered hazardous are any conditions that jeopardize young workers' development or prevent them from finishing their compulsory school education.</p> <p>The assessor shall check the record of working hours and cross-check its contents in the workers (children or guardians) interview, where possible, including the confirmation of the nonhazardous nature of the work during worker interview.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>		

N°	Principle	Criteria	Level	Verification method
9.4	Supervisory staff has been informed of the legal requirements on working age and of the effective remediation plan (when workers under the age 18 are found working in non-compliance).	<p>The term “supervisory staff” shall refer to any staff member in contact with workers or with supervising duties at the production site (e.g., foreman, manager, crew supervisor, etc.). If the producer does not have such staff, the producer shall have knowledge of the GRASP criteria on this topic and shall have a remediation plan.</p> <p>There shall be a documented remediation plan for potential non-compliances of all the P&Cs in this section. Compliance without a remediation plan shall be possible only if no workers are under the age of 18. For Option 2 producer groups, compliance without a remediation plan shall be possible only if there are no family farms among the producer group members and/or none of the producer group members have workers under the age of 18.</p> <p>For family farms without hired workers, “workers” shall refer to core family members working on the farm.</p> <p>The remediation plan shall, at minimum, include written details on how the children will be removed from the workplace and replaced and how the organization is preventing every individual child from entering worse forms of child labor (including hazardous work, slavery-like practices, recruitment into armed conflict, sex work, labor trafficking, and/or illicit activities).</p> <p>In case of non-compliances with P&Cs under this section, immediate remedy for children or young workers shall be provided (i.e., removal from situation). For young workers, in addition to the removal, there shall be assurance of future remediation actions (included in the plan) securing access to adequate work and wages (if applicable). This shall be applicable to family farms accordingly.</p> <p>Evidence: The plan and follow-up actions shall be documented by the producer and verified by the assessor.</p>	Minor Must	For subcontracted labor, this information shall be available in the list of workers as required in P&C 6.1 of this document.

N°	Principle	Criteria	Level	Verification method
		<p>For Option 2 producer groups, the plan can be developed at QMS level.</p> <p>The assessor shall check on producer group member level that each producer is aware and has knowledge of the plan (i.e., the plan is available at the production site and staff have been instructed). Documental evidence of the type of information with evidence of participation of the supervisory staff shall be required.</p>		
10	COMPULSORY SCHOOL AGE AND SCHOOL ACCESS			
10.1	<p>Any children at compulsory school age living or working on any production sites shall have access to school education.</p>	<p>The term “any children” shall include children legally working (i.e., children on family farms, children at legal age of employment, etc.), children of workers and of supervisory staff (including the owner, operator, etc.).</p> <p>If the age of compulsory school completion is higher than the set legal minimum age of employment and children below the age of compulsory school completion are hired, the producer shall guarantee that any worker below the age of completion of compulsory school shall have access to school education.</p> <p>The term “access to school education” shall require that children have the possibility to enroll in and attend school (i.e., school is reachable within a reasonable distance, school route is safe, etc.).</p> <p>The producer shall instruct workers who are parents or guardians of children living at the production site or of employed children below the age of completion of compulsory school about the possibilities of access to school education in the area. It is understood that parents/guardians are responsible for enforcing attendance at school. This shall be applicable to family farms accordingly.</p> <p>Evidence: Compliance shall be granted when the assessor has verified that no children at/below compulsory school age are living or</p>	Major Must	<p>For subcontracted labor, the assessor shall verify the information available in the list of workers as required in P&C 6.1 of this document.</p> <p>For young workers (above the minimum working age but still of compulsory schooling age) or children of subcontracted workers living on the farm, the producer is still responsible for informing them of the requirements of this P&C. The assessor shall look for the same evidence for all types of workers.</p>

N°	Principle	Criteria	Level	Verification method
		<p>working on any production sites. In all other cases, the assessor shall verify compliance with the requirements of the PC criteria.</p> <p>The assessor shall check verbal and documental evidence from the producer.</p> <p>The assessor shall cross-check information with interviews where possible.</p>		
10.2	<p>The producer verifies and keeps records with the full name, name of parents, and date of birth of all children at the production sites who are below the age of completion of compulsory schooling.</p>	<p>The term “verifies and keeps records” requires that the producer shall have a verification process or method (e.g., checking worker ID, working permit, working registration card, trade union membership card, etc., and keeping a copy on file) to verify the information. This shall be applicable to family farms accordingly.</p> <p>Evidence: Compliance shall be granted when the assessor has verified that no children at/below compulsory school age are living or working on any production site. In all other cases, the assessor shall verify compliance with these criteria. For family farms without hired workers, the producer shall provide testimony in the form of documents and this shall be cross-checked with other core family members where possible.</p> <p>The producer shall provide this information to the assessor at the beginning of the assessment (e.g., list of workers, list with files and documents, etc.).</p> <p>The assessor shall cross-check the list by including in the interview sample of workers at least some workers with listed children.</p>	Minor Must	<p>For subcontracted labor, the producer is still responsible for verifying compliance with these requirements. All requirements described in this P&C apply also to subcontracted.</p> <p>The assessor shall look for the same evidence for all types of workers.</p>
10.3	<p>If access to a school is not possible, the producer facilitates transport for children below the age of</p>	<p>The term “access to a school is not possible” shall cover situations in which children have no possibility to enroll in and cannot attend school (e.g., school is not reachable by walking an age-appropriate distance without compromising the children’ health or safety, the school route is not safe, etc.).</p>	Major Must	<p>For subcontracted labor, the producer is still responsible for verifying compliance with these requirements. All requirements</p>

N°	Principle	Criteria	Level	Verification method
	completion of compulsory schooling.	<p>The term “facilitates transport” shall require the producer to request public transport from local authorities, provide private transportation, or subsidize transportation as necessary to ensure that children can easily get to school. This shall be applicable to family farms accordingly. For family farms without hired workers, family income limitations may be considered by the assessor when assessing compliance with these criteria.</p> <p>Evidence: Compliance shall be granted when the assessor verifies that no children at/below compulsory school age are living or working on any production site. In all other cases, the assessor shall verify compliance with these criteria. The assessor shall check, e.g., documented inspections of the transportation and records of trips and shall cross-check the information in interviews with workers with listed children, when interviews are possible.</p>		described in this P&C apply also to subcontracted workers. The assessor shall look for the same evidence for all types of workers.

N°	Principle	Criteria	Level	Verification method
10.4	If schools are not available for children living and/or employed on the production sites who are below the age of compulsory school completion, the producer facilitates on-site schooling.	<p>The term “facilitates on-site schooling” shall include, e.g., requests to local authorities for teachers to come onto the production site, providing possibilities for teachers to come onto the production site, subsidizing teachers to come onto the production site, etc. This shall be applicable to family farms accordingly.</p> <p>Evidence: Compliance shall be granted when the assessor has verified that no children at/below compulsory school age are living or working on any production sites. In all other cases, the assessor shall verify compliance with these criteria. The assessor shall check if schools are available before the assessment. The assessor shall then inspect the premises and check documental evidence and verbal explanation from producer, i.e., documented inspections of the transportation, record of trips, interviews with workers with listed children, where interviews are possible.</p>	Major Must	For subcontracted labor, the producer is still responsible for verifying compliance with these requirements. All requirements described in this P&C apply also to subcontracted workers. The assessor shall look for the same evidence for all types of workers.
11	TIME RECORDING SYSTEMS			
11.1	A time recording system is in place and suitable for the type and the size of the production site.	<p>The system shall provide management and all workers with information on the number of hours worked. For each worker, the system shall provide the exact in and out times for each day for the easy verification and confirmation by the workers. Examples of suitable systems include a time record sheet, a check clock, electronic cards, etc.</p> <p>For subcontracted labor, where the system is the responsibility of the direct employer, a sample of the record shall be provided. If the producer is responsible, the assessor shall check the producer system. For family farms, the system indicates at least the name, time in and out of work of the family member per day.</p>	Major Must	Where the subcontractor is responsible for the time recording system, the producer shall have verified that the direct employer records the working hours and that the time recording system works. The producer may keep the time recording system for subcontracted workers working on the registered farm. Additionally, the producer shall keep a sample (an example) of a

N°	Principle	Criteria	Level	Verification method
		<p>Evidence: The assessor shall check the existence of the system and whether it is suitable to the farm.</p> <p>The assessor shall request and check subcontracted labor information on this P&C, where applicable.</p>		time register record provided by the direct employer.
11.2	The system provides a record of the regular working hours and overtime hours for each worker.	<p>The record shall include a description of the calculation of working hours (i.e., new forms of shift work, average number of hours worked, flex-time arrangements, compressed work weeks, on-call work, along with extended or even 24/7 availability shall be reflected in the producer's time recording system).</p> <p>For subcontracted labor, where the system is the responsibility of the direct employer, a sample of the record shall be provided. If the producer is responsible, the assessor shall check the producer system.</p> <p>For family farms, they shall document at least the working times of the family members per day.</p> <p>Evidence: The assessor shall check documents and cross-check the contents in interviews, where possible.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>	Major Must	Where the subcontractor is responsible for the time recording system, the sample mentioned in P&C 11.1 of this document shall show that the system is able to provide a clear record of the regular working hours and overtime hours for each worker.
11.3	The system provides a record of the effective daily breaks, weekly breaks, and holidays for each worker.	<p>In countries where the legislation and/or collective bargaining agreements allow for flexible working hours, compensation of break hours, schedule changes due to weather, day accumulation or compensation, and other similar forms of wage calculation, the system shall provide a record of how these forms of calculation are applied.</p> <p>For subcontracted labor, where the system is the responsibility of the direct employer, a sample of the record shall be provided. If the</p>	Major Must	Where the subcontractor is responsible for the time recording system, the sample mentioned in P&C 11.1 of this document shall provide evidence that the system shows a clear record of the daily breaks,

N°	Principle	Criteria	Level	Verification method
		<p>producer is responsible, the assessor shall check the producer system. For family farms, they shall indicate at least the time of daily breaks and days of weekly breaks, if any.</p> <p>Evidence: The assessor shall check documents and cross-check the contents in interviews, where possible. The assessor shall request and check subcontracted labor information on this P&C. For family farms, verbal indication can be taken as evidence when confirmed by other members.</p>		<p>weekly breaks, and holidays for each worker.</p>
11.4	<p>All workers are instructed on the time recording system and on checking the system.</p>	<p>The term “instructed” requires that the producer shall communicate to the workers how and where to check the information (e.g., providing information in a meeting, communicating it when hiring combined with signs or board announcements at payday schedule, maintaining a daily signed record sheet, checking clock report, providing a summary with code of each worker to maintain confidentiality, etc.). This information shall be explained to all new workers. For very short-term workers, this information shall be provided in the first meeting of working instructions.</p> <p>Evidence: The assessor shall check: - Availability of information to the workers - Evidence of instructions</p>	<p>Minor Must</p>	<p>Where required, the CB assessor shall interview the workers and check whether subcontracted workers are aware of the time recording system and how they can check it. If interviews are not required, the assessor shall check with the worker representation/management GRASP liaison how this is communicated to workers.</p>

N°	Principle	Criteria	Level	Verification method
11.5	Each worker has access to a summary of the system records before or at the moment of wage payment in at least the worker’s working instruction language or in the predominant language(s) of the workforce.	<p>The term “access” shall require that every worker has the possibility to check their record of hours before payment and the possibility to file a complaint using that information.</p> <p>The information shall be written in such a way as to be easily understood by the workers.</p> <p>Evidence: The assessor shall check copies of the summary during the document review. Information shall be cross-checked in interviews, where possible. The assessor shall check type, frequency, and efficiency of the access to decide on compliance.</p>	Minor Must	During interviews with subcontracted workers (where required), the CB assessor shall cross-check whether workers have access to the summary of hours worked provided by the system. If interviews are not required, the assessor shall check with the worker representation/management GRASP liaison how the instructions are communicated to workers.
12	WORKING HOURS			
12.1	Working hours (including overtime, night work, and rest days/breaks) with indication of peak/harvesting season are shown in the records.	<p>Records on working hours, overtime, night work instructions, and breaks shall be available.</p> <p>For subcontracted labor, the producer shall check compliance. If non-compliance is found, the producer shall document each instance and include corrective steps taken. For family farms this shall be checked with the working conditions for children and young workers.</p> <p>Evidence: The assessor shall check records and compliance of conditions comparing records with legislation, using NIGs as guidance but relying on legal regulations.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>	Major Must	The producer shall monitor the working hours for subcontracted labor in the same way as for employed workers.

N°	Principle	Criteria	Level	Verification method
12.2	All overtime hours are voluntary, if not regulated otherwise in the national law or collective bargain agreement.	<p>All overtime shall be documented in the records. The term “voluntary” shall require that overtime is not mandatory but an agreement between worker and employer for an exceptional cause. Overtime shall not result in forced labor or potential labor abuses (e.g., no leaving premises of the farm, retention of documents, lack of breaks or limited breaks, etc.). For subcontracted labor, the producer shall check compliance. If non-compliance is found, the producer shall document each instance and include corrective steps taken.</p> <p>Evidence: The assessor shall check inclusion of overtime instructions in the working term conditions document, in the weekly schedule, or in the working instructions. The assessor shall cross-check records of instructions and system with workers interviews, where possible. If interviews are not possible, the assessor shall use documents (e.g., pay slips, payments records, and terms of employment). The assessor shall request and check subcontracted labor information on this P&C.</p>	Major Must	<p>The CB GRASP assessor shall interview subcontracted workers to verify that the overtime, if any, was voluntary. The producer shall monitor the overtime on the farm for subcontracted labor in the same way as for employed workers. If interviews are not required, the assessor shall check with the worker representation/ management GRASP liaison and with the time registers.</p> <p>The producer shall contact the direct employer to communicate any problem related to overtime and ask for a solution from the subcontractor.</p>
12.3	Overtime shall not be requested on regular basis in a production cycle/year and as indicated by law.	<p>The term “not on a regular basis” shall require that overtime is exceptional due to special circumstances needed in the farm beyond normal planning. In contrast, work done on a “regular basis” is not due to special circumstances and arises repeatedly: Once a week, once a month, or outside of peak/harvesting season. Harvesting/peak seasons are considered special circumstances in a production cycle/year.</p>	Major Must	<p>The CB GRASP assessor shall interview subcontracted workers to verify that overtime, if any, is not requested on a regular basis. The producer shall monitor the overtime on the farm for subcontracted labor in the same way as for employed workers.</p>

N°	Principle	Criteria	Level	Verification method
		<p>For subcontracted labor, the producer shall check compliance. If non-compliance is found, the producer shall document each instance and include corrective steps taken.</p> <p>Evidence: The assessor shall check records of overtime and cross-check their contents in workers interviews, where possible. The assessor shall request and check subcontracted labor information on this P&C.</p>		<p>The producer shall contact the direct employer to communicate any problem related to overtime and ask for a solution from the subcontractor. If interviews are not required, the assessor shall check this with the worker representation/ management GRASP liaison and the time registers.</p>
12.4	<p>Working time does not exceed 48 hours weekly (excluding overtime) unless indicated by law or collective bargaining agreement. The employer reports the total hours worked, and if they exceed 48 hours, the appropriate safeguards are in place to protect the workers' health and safety.</p> <p>If national legislation and collective bargaining agreements set lower weekly</p>	<p>If national legislation or bargaining agreements include averaging arrangements, this method can be used in calculations. The assessor shall check the calculation methods. The term "indicated by law" shall cover, e.g., the possibility to average hours across a period or compensate hours, new forms of shift work, average number of hours worked, flex-time arrangements, compressed work weeks, on-call work, along with extended or even 24/7 availability. These exceptions give flexibility to the limit of daily hours as well as weekly hours. However, average working hours shall not exceed 48 hours per week within a period of three months or less. Safeguards shall be in place to protect the workers' health and safety, including a strategy to balance hours with breaks and monitoring the health and levels of productivity of the worker. Safeguards can include, e.g., providing preventive breaks, monitoring increases in work accidents caused by fatigue, shift systems designed to minimize fatigue accumulation, risk assessment of the nature of work considered so that workload does not increase risk to safety and health.</p>	Major Must	<p>The CB GRASP assessor shall interview subcontracted workers to verify that the regular working time, if any, does not exceed 48 hours a week. The producer shall monitor the working hours on the farm for subcontracted labor in the same way as for employed workers. If interviews are not required, the assessor shall check with the worker representation/ management GRASP liaison and with the time registers.</p> <p>The producer shall contact the direct employer to communicate any problem related to working</p>

N°	Principle	Criteria	Level	Verification method
	<p>working hours (excluding overtime), these lower limits shall prevail.</p>	<p>For subcontracted labor, the producer shall check compliance. If non-compliance is found, the producer shall document each instance and include corrective steps taken.</p> <p>Evidence: The assessor shall compare records of the hours for each worker with national regulations, using NIGs as guidance but relying on legal regulations. Where interviews are possible, the assessor shall cross-check information with workers following the sampling rules for documents.</p> <p>On safeguards, the producer may present a copy of a risk assessment of workers' health and safety and safety procedures from GLOBALG.A.P. certification indicating safety procedures are in place for working more than 48 hours. Compliance shall include application of the procedures.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>		<p>hours and ask for a solution from the subcontractor.</p>

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12.5	<p>Rest breaks/days as shown in the records indicate compliance with national regulations and/or collective bargaining agreements.</p> <p>If not specifically regulated for agriculture by local laws or collective bargaining agreements, the rest/breaks include, at least:</p> <ul style="list-style-type: none"> (a) Short breaks during working hours (b) Sufficient breaks for meals (c) Daily or nightly rest of not less than 8 hours within a 24-hour period (d) Rest of at least a full calendar day within a week 	<p>For subcontracted labor, the producer shall check compliance. If non-compliance is found, the producer shall document each instance and include corrective steps taken.</p> <p>Evidence: The assessor shall compare records of rest breaks/days for each worker with national regulations, using NIGs as guidance but relying on legal regulations. Where interviews are possible, the assessor shall cross-check information with workers following the sampling rules for documents.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>	Major Must	<p>The CB GRASP assessor shall interview subcontracted workers to verify that rest breaks/days as shown in the records are compliant with national regulations. The producer shall monitor the working hours on the farm for subcontracted labor in the same way as for employed workers.</p> <p>If interviews are not required, the assessor shall check with the worker representation/ management GRASP liaison and with the time registers.</p> <p>The producer shall contact the direct employer to communicate any problem related to working hours and ask for a solution from the subcontractor.</p>
12.6	<p>Total weekly working hours (including overtime) as shown in the records indicate compliance with</p>	<p>If national legislation or bargaining agreements include averaging arrangements, this method can be used in calculations. The assessor shall check that the calculation methods are a) clearly defined and b) in line with national legal requirements.</p>	Major Must	<p>The CB GRASP assessor shall interview subcontracted workers to verify that total weekly working hours (including overtime) as shown in the records are</p>

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	<p>national legislation and collective bargaining agreements.</p> <p>If national legislation sets total weekly working hour limits higher than 60 hours (including overtime) in peak season and/or agricultural workers are exempt from overtime limitations, the employer reports the total weekly hours worked and which appropriate safeguards are in place to protect the workers' health and safety.</p>	<p>If the total number of weekly hours worked (including overtime) exceeds 60 hours, the assessor shall check that conditions set up by law are applicable to this situation and check any industry-related collective bargaining agreement.</p> <p>Safeguards shall be in place to protect the workers' health and safety, including a strategy to balance hours with breaks and monitoring the health and levels of productivity of the worker. Safeguards can include, e.g., providing preventive breaks, monitoring increases in work accidents caused by fatigue, shift systems designed to minimize fatigue accumulation, and/or risk assessment of the nature of work considered so that workload does not increase risk to safety and health.</p> <p>For subcontracted labor, the producer shall check compliance. If non-compliance is found, the producer shall document each instance and include corrective steps taken.</p> <p>Evidence: The assessor shall compare records of total hours per week for each worker with national regulations, using NIGs as guidance but relying on legal regulations. Where interviews are possible, the assessor shall cross-check information with workers following the sampling rules for documents. Comments describing the methods of calculation of hours shall be included in the report.</p> <p>On safeguards, the producer may present a copy of a risk assessment of workers' health and safety and safety procedures from GLOBALG.A.P. certification indicating safety procedures are in place for working more than 48 hours. Compliance shall include application of the procedures.</p> <p>The assessor shall request and check subcontracted labor information on this P&C.</p>		<p>compliant with national legislation and collective bargaining agreements.</p> <p>The producer shall monitor the working hours on the farm for subcontracted labor in the same way as for employed workers.</p> <p>If interviews are not required, the assessor shall check with the worker representation/ management GRASP liaison and with the time registers.</p> <p>The producer shall contact the direct employer to communicate any problem related to working hours and ask for a solution from the subcontractor.</p>

N°	Principle	Criteria	Level	Verification method
12.7	Supervisory staff is instructed about the safeguards in place to protect the workers' health and safety-when working over the regular weekly working time and/or over the peak season weekly working time.	<p>The term “supervisory staff” shall refer to any staff member in contact with workers or with supervising duties at the production site (i.e., foreman, manager, crew supervisor, etc.). If the producer does not have such staff, the producer shall have knowledge of the GRASP criteria on this topic and shall have safeguards in place. There shall be a record of the safeguards in place to protect the workers' health and safety. For subcontracted labor, the producer shall check compliance. If non-compliance is found, the producer shall document each instance and include corrective steps taken.</p> <p>Evidence: The assessor shall check records of instructions and subcontracted labor compliance. The assessor shall request and check subcontracted labor information on this P&C.</p>	Minor Must	<p>The producer shall monitor working time for subcontracted workers in the same way as for own workers and instruct supervisory staff to monitor and implement safeguards when subcontracted workers work overtime. To verify compliance with this P&C, the assessor shall interview supervisory staff when available, or alternatively the worker representation/ management GRASP liaison, and cross-check with time registers and the safeguards implemented.</p>
12.8	Workers are communicated to effectively use the rest breaks/days during peak season.	<p>The term “communicate” shall require providing information during the weekly schedule or in the working instructions given during the day. For subcontracted labor, the producer shall check compliance. If non-compliance is found, the producer shall document each instance and include corrective steps taken.</p> <p>Evidence: The assessor shall check communication methods and, where interviews are possible, cross-check records with workers. The assessor shall request and check subcontracted labor information on this P&C.</p>	Minor Must	<p>During interviews with subcontracted workers, the producer and the GRASP CB assessor shall cross-check whether subcontracted workers know to effectively use the breaks and rest days. If the producer identifies that the workers are not aware, then communication with the direct employer shall follow to ask for a correction.</p>

N°	Principle	Criteria	Level	Verification method
13	DISCIPLINARY PROCEDURES			
13.1	A written disciplinary procedure is available.	<p>The process shall be simple and available to all workers hired, including subcontracted labor.</p> <p>The written disciplinary procedure shall at least include and explain these steps:</p> <ol style="list-style-type: none"> 1. Hearing 2. Decision 3. Appeal or revision 4. Final decision (corrective measures) <p>The process shall be available in the predominant language(s) of the workforce and/or pictograms.</p> <p>Evidence: The assessor shall check the existence of a written procedure. The assessor shall request and check subcontracted labor information on this P&C.</p>	Major Must	
13.2	Workers are informed about the terms of the disciplinary procedure, including that any deduction from wages as a disciplinary measure is prohibited.	<p>The assessor shall check that all workers are informed of the procedures. Special attention shall be paid to workers with very short-term contracts.</p> <p>Compliance with this P&C shall require that:</p> <ol style="list-style-type: none"> 1. The procedure is explained to workers. 2. The written procedure is available to workers. <p>Subcontracted agricultural labor shall be instructed on these procedures in the scope of their work at the production site and the requirements to perform activities at the production site of the producer.</p> <p>Information on the procedures shall be available in the predominant language(s) of the workforce and/or pictograms (especially for workers who cannot read), e.g., farm sign boards, handouts given directly to</p>	Minor Must	Subcontracted workers on the farm shall be aware of the disciplinary procedure described in P&C 13.1 of this document. The CB GRASP assessor shall also confirm compliance through interviews combined with verification of records.

N°	Principle	Criteria	Level	Verification method
		<p>workers/subcontractors (evidence of accessibility of handouts shall be presented).</p> <p>Evidence: The assessor shall check records of instructions (e.g., for correct contents, participants' list) and subcontracted information, where applicable. Documented initial instruction may include the indication of the procedures to seasonal workers.</p>		
13.3	Records are kept of any disciplinary actions taken during the last 24 months.	<p>Records shall include information on the name of the worker, disciplinary situation and resolution, and start and end date of procedure.</p> <p>Evidence: The assessor shall check records of disciplinary actions taken.</p>	Minor Must	
14	GRASP QMS			
14.1	The assessment of the producer group's GRASP QMS shows evidence of the correct implementation of GRASP for all participating producer group members.	<p>Compliance with this P&C shall require that all the following have been checked and reported compliant:</p> <ol style="list-style-type: none"> 1. The implementation of GRASP is included in the GRASP QMS of the producer group, based on the "GLOBALG.A.P. general regulations – Rules for producer groups and multisite producers with QMS." 2. There is a system in place to regularly inform and train key staff of each producer group member on GRASP-related P&Cs, topics, and issues (e.g., train supervisory staff on remediation plan for child labor). 3. All steps taken in the frame of the QMS to implement GRASP among all participating producer group members are documented. 4. There is evidence that the producer group fosters compliance of all participating producer group members with the GRASP requirements and assesses the progresses and problems complying with GRASP every year. 	Major Must	For producer groups, the QMS should include a register and identification of all producer group members/production sites and any subcontracted activity conducted there, independently of whether the QMS is organized by the individual producer or at the producer group level.

N°	Principle	Criteria	Level	Verification method
		<p>5. A register is maintained of all producers with GLOBALG.A.P. certified production processes implementing GRASP. For every producer group member, it contains the internal assessment date as well as the compliance level reached, all non-compliances detected in internal and external assessments, and corrective actions following non-compliances.</p> <p>6. There is a procedure to implement corrective actions resulting from previous internal assessments for all the producer group members.</p> <p>7. There is evidence of application of the procedure to implement corrective actions resulting from previous internal assessments for all producer group members.</p> <p>8. The internal producer group auditor is qualified according to the GRASP general rules.</p> <p>Evidence: The assessor shall check each of the GRASP QMS requirements during the IFA CB QMS audit. The assessor shall request documental evidence and cross-check with related criteria during the producer group members' external assessment (i.e., training and information related to remediation plan for child labor at producer group member level). Documental evidence of meetings and interviews with producer group members on revision of progress shall be included. The procedure to implement corrective actions shall relate to the existence of the internal GRASP assessment and corrective actions of the producer group member.</p>		

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