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# **EUREPGAP BENCHMARKING PROCEDURE**

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## **Official Version 1.0**

**May 2003**

**Applicable  
to all available and future  
EUREPGAP Scopes**

(Fruit and Vegetables, Flowers and Ornamentals, Integrated Farm Assurance,  
Fish Farming, Coffee, etc.)

**and to all  
Applications for Benchmarking received after 1<sup>st</sup> May 2003**

(Special Transition Rules apply for Schemes already approved/benchmarked  
on 30<sup>th</sup> April 2003 and for Applicant Schemes where applications have been  
received but the approval has not been granted before 1<sup>st</sup> May 2003.)

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## **1 Introduction**

Certification of a Product (a term used to include a process or service) is a means of providing assurance that it complies with specified standards and other normative documents.

The purpose of this document is to define a set of standards for establishing the equivalence of specified standards (and other normative documents) against the EUREPGAP set of standards, such that this process is completed in a consistent, reliable and transparent manner, thereby facilitating their acceptance on a national and international basis and so furthering international trade.

The requirements contained in this standard are written, above all, to engender confidence in the equivalence of a specified standard and its normative documents including the certification system, to the EUREPGAP standard and its normative documents including the certification system.

The need for the standard has arisen particularly within the agri-food sector where a number of different standards have been developed for operation under ISO/IEC Guide 65 (EN45011).

## **2 Scope**

This procedure specifies the general requirements that shall be followed by FoodPLUS, (as product certification standard owner operating EUREPGAP standards and other normative documents), if it is to recognise and endorse as equivalent to its own specified standards and normative documents including the certification system, the standards, normative documents and certification system of another standard owner-. The procedure is set out in diagrammatic form at Annex 2.

## **3 References**

- ISO19011:2002 "Guidelines for quality and/or environmental management systems auditing.
- ISO IEC Guide 7 -1194 Guidelines for Drafting Standards Suitable for Use of Conformity Assessments.
- ISO/IEC Guide 65 – 1996. General Requirements for bodies operating product certification systems.
- ISO/IEC Guide 2.
- ISO 8402.

## **4 Definitions**

For the purpose of this Standard, the relevant definitions given in ISO-IEC Guide 2 and ISO 8402 apply, together with the following definitions:

### **4.1 EUREPGAP Standard**

Specified standards within EUREPGAP and other normative documents have been developed in compliance with ISO/IEC Guide 65 clause 4.1.3, which are available from FoodPLUS specifically as a reference point or benchmark against which equivalence can be demonstrated.

### **4.2 EUREPGAP Certification System**

A certification system that complies with both the requirements of ISO IEC Guide 65 and the requirements defined by the EUREPGAP General Regulations.

### **4.3 Equivalent Standard**

A standard that has successfully completed the procedures set out in this document and been formally recognised by FoodPLUS as equivalent.

### **4.4 Equivalent Certification System**

A certification system that has achieved accreditation under ISO/IEC Guide 65 (EN45011) with an accreditation body that is a member of the International Accreditation Forum (IAF) and is signed up to the Multi-Lateral Agreement (MLA) concerning ISO IEC Guide 65. The certification system must be operated only by certification bodies that have achieved the above accreditation directly for the equivalent standard, where the certification system has successfully completed the equivalence procedures set out in this standard.

## **5 FoodPLUS, EUREPGAP Standard Manager**

### **5.1 Development of Reference Standards**

FoodPLUS has developed and will continue to develop EUREPGAP standards in compliance with the requirements of ISO/IEC Guide 65 Clause 4.1 and 4.2, in so far as these clauses relate to the criteria for the development of standards and the required organizational structure.

### **5.2 Development of a Reference Certification System**

5.2.1 FoodPLUS sets out in its normative documents, EUREPGAP General Regulations, the requirement for all certification bodies operating the EUREPGAP standard.

5.2.2 FoodPLUS defines in the EUREPGAP General Regulations the requirements as set out in ISO/IEC Guide 65 s 5.2 for Certification Body Personnel Qualification Criteria, Clause 13 for Surveillance and Clause 14 in so far as this clause relates to the use of the EUREPGAP Mark.

5.2.3 FoodPLUS will ensure that clear, unambiguous and objective guidance is given on interpretation of the EUREPGAP Standard and the compliance criteria required.

## **6 Equivalent Standard**

The owner of a standard seeking recognition of equivalence will ensure that the standard seeking equivalence has been developed in compliance with the requirements of ISO/IEC Guide 65.

## **7 Equivalence Procedure**

FoodPLUS will operate the following procedures to ascertain whether a standard and its certification system can demonstrate equivalence to the EUREPGAP standard and its certification system and as a result be formally recognised.

### **7.1 Impartiality**

FoodPLUS will ensure that the equivalence procedure is implemented under independent, impartial, technically competent and transparent procedures.

### **7.2 Applications**

#### **7.2.1 Information on the Procedure**

7.2.1.1 FoodPLUS shall provide applicants (standard owners) an up-to-date detailed description of the equivalence procedures appropriate for each of its EUREPGAP

standards and the pro-forma documentation (see annex 1) that must be submitted as part of the equivalence procedure, copies of the applicants rights and the duties of certification bodies which operate standards that are formally recognised as equivalent.

7.2.1.2 FoodPLUS shall require that any certification body operating the equivalent standard and the equivalent standard owner:

- (a) Always comply with any formally accepted equivalent standard and equivalent certification system
- (b) Have documented arrangements with all the individual certification bodies operating the equivalent standard that ensure that the certification body operates in compliance with all the requirements of the EUREPGAP certification system including ISO/IEC Guide 65
- (c) Make claims regarding equivalence only in respect of the scope for which equivalence has been granted
- (d) Does not use its equivalence in such a manner as to bring FoodPLUS or EUREPGAP into disrepute and does not make any statement regarding its equivalence status which FoodPLUS may consider misleading or unauthorised.
- (e) Upon suspension or cancellation of the equivalent status discontinues using all advertising matter that contains any reference to EUREPGAP and returns any documents as required by FoodPLUS.
- (f) Make it clear that the standard owner seeking equivalence must complete the process within a defined time period of no more than one year.
- (g) Incorporate technical changes and updates in the equivalent standard and innovations and improvements in the certification mechanism implemented by FoodPLUS within the timeframes indicated by FoodPLUS.

## 7.2.2 Application by a Standard Owner

1.1.1.1 An application seeking recognition for the equivalence of a Standard may only be made by the Standard Owner directly to FoodPLUS.

7.2.2.1 There shall be (initial) contractual arrangements in place between FoodPLUS and the Standard Owner seeking equivalence. This contract will detail, (non-exhaustive list), the termination date, cancellation clauses, the right of FoodPLUS to audit the standard by an Independent Technical Review organization (see point 7.3.2), economical conditions, and dispute procedure. Review procedures should also be agreed on.

In the same manner and in order to obtain finally the accepted equivalence, there shall be contractual arrangements (final benchmarking contract) between FoodPLUS and the owner of the standard seeking equivalence when this has been successfully recommended by the TSC (see point 7.4.1).

7.2.2.2 The Standard Owner seeking equivalence may either itself, or using a third party, provide a complete report within the FoodPLUS approved format in English and original language where applicable:

- (a) Summary: A summary of the Standard seeking equivalence, its objective, details of its development and the operating procedures required in any certification system
- (b) Technical Benchmarking Document: A clause -by- clause cross-reference to the standard seeking equivalence against EUREPGAP. This clause -by- clause comparison should also detail the compliance criteria and provide any argument necessary to justify equivalence (see Annex 1).
- (c) Certification Mechanism Benchmarking Document: The requirements of the certification system seeking equivalence must be cross-referenced with all of the requirements of the EUREPGAP General Regulations and demonstrate the equivalent or higher rigour of inspection and certification elements (by a third party) of the standard seeking equivalence. (see Annex 1).
- (d) Officially authenticated Translation of all the above mentioned documents: Required where questions are raised concerning the accuracy of translation.

### 7.2.3 Application by a Certification Body

7.2.3.1 Where FoodPLUS has formally recognised an equivalent standard and equivalent certification system, an application procedure will be in place for individual certification bodies that certify the equivalent standard and equivalent certification system so that they may become formally approved by FoodPLUS, in accordance with the prevailing EUREPGAP certification body approval procedure. Applications will only be accepted where the applicant certification body provides written proof that the respective equivalent standard owner raises no objection to the respective applicant certification body operating and issuing certificates to the equivalent standard scope.

### 7.2.4 Requirements of an Endorsed Standard

The standard shall:

- (a) have copyright which is held by an identified legal entity, or have made appropriate application for such copyright;
- (b) be clear and precise in its wording and phraseology to facilitate accurate and uniform interpretation, and allow for the assessment for compliance of an applicant.
- (c) be publicly available. The levying of a reasonable fee for the purchase of the standard will not be regarded as a restriction or limitation.

## **7.3 Technical Review**

### 7.3.1 Preliminary Technical Review

7.3.1.1 FoodPLUS will appoint a suitable technical person (whether employed by FoodPLUS or not) or contract a competent, independent organization that will complete a preliminary review to ensure that the application in English meets all the requirements defined by FoodPLUS. This technical person or organization must have experience in conformity assessment, and comply with the requirements set by FoodPLUS for certification body personnel as indicated in clause 5.2.2.

If any relevant technical or formal incidence is detected, the application shall be returned to the applicant for amendment. In this case a new application shall be required.

Preliminary technical review Inform must be issued to the applicant in a period no longer than two weeks.

7.3.1.2 Where the application requirements are met, the application from a standard owner only will be subject to peer review for a period of two to three months. The peer review will be by written consultation with EUREPGAP members and members of the EUREPGAP Council, including primary producers, manufacturers, wholesaler distributors, retailers, consumers, government, academics and certification bodies operating EUREPGAP and/or standard seeking equivalence. FoodPLUS will identify stakeholders from the above list and make this list publicly available. The consultees will be invited to make written technical comment only and must provide justification in English.

### 7.3.2 Independent Technical Review

An independent, impartial and technically competent person or organization appointed by FoodPLUS with no direct connection with the standard owners (reference standard and standard seeking equivalence) will review, in a period no longer than one month, the full consultation responses and the application in detail. The persons undertaking the Independent Technical Review must have experience in conformity assessment and, if applicable, a knowledge of the field of application and geographical region where the submitted standard and certification system is proposed to operate, and comply with the requirements set by the FoodPLUS for certification body personnel as indicated in clause 5.2.2. This Independent

Technical Reviewer will summarise all the consultation responses, the application itself and produce a detailed report.

If any technical or formal incidence is detected in this review, the application is returned to the applicant who has one month to propose the amendments to the Independent Technical Reviewer.

A final Independent Report will evaluate the proposal of amendments, if any, and will make one of the following recommendations:

- (i) equivalence is accepted
- (ii) equivalence with agreed changes
- (iii) rejection of the application

### **7.3.3 Independent Witnessed Assessment.**

An independent, impartial and technically competent person or organization appointed by FoodPLUS with no direct connection with the certification body or the standard owners (FoodPLUS and owner of standard seeking equivalence) will undertake a witnessed assessment of an audit carried out in the field by an auditor of a certification body that is certifying to the scope of the standard seeking equivalence. In case of more than one certification body, FoodPLUS or the organization appointed by FoodPLUS will select one. The person or organization appointed by FoodPLUS will validate in-field the reviewed Standards Cross-Reference and Compliance Criteria document (13.1) with the selected CB. This independent witnessed assessment will summarise all conflicting points, justifying each point queried and produce a detailed report.

The validation of implementation of the reviewed Certification System Cross-Reference document (13.2) is not part of the independent witnessed assessment. This validation will be carried out by the accreditation body as part of the accreditation process of each CB operating the applicant scheme, only after formal recognition of equivalence (7.4) has been granted. This validation will lead to a claim of compliance to the EUREPGAP General Regulations, which will be stated in the accreditation certificate of each CB operating the applicant scheme.

If any technical or formal incidence is detected in this review, the application is returned to the applicant who has one month to propose the amendments to the Independent Witnessed Assessment Person or Organization.

A final Report from the Independent Witnessed Assessment Person or Organization will evaluate the proposal of amendments, if any, and will make one of the following recommendations:

- (i) equivalence is accepted
- (ii) equivalence with agreed changes
- (iii) rejection of the application

### **7.3.4 Technical Standards Committee Review**

The technical standards committee responsible for the development of the EUREPGAP standard will consider the independent technical review, and in its next meeting will decide to accept, accept with modifications or reject the application. Written justification must be provided if the technical standards committee does not accept the recommendations set out in the independent technical review report.

## **7.4 Formal Recognition of Equivalence**

7.4.2 If the EUREPGAP Technical Standards Committee recommends acceptance after the Independent Technical Report, a Notice of Intent to formally recognise as equivalent will be circulated for a 2-week period to consultees who responded to the consultation process set out at clause 7.3.1.2 of this standard. The respective Technical Standards

Committee of EUREPGAP will consider final comments (if any) and if there is no significant concern, will accept the formal equivalence.

- 7.4.3 There shall be contractual arrangements in place between FoodPLUS and the Standard Owner whose standard has achieved acceptance by the TSC. This contract will detail, (non-exhaustive list), the termination date, cancellation clauses, the right of FoodPLUS to survey the standard by an Independent Technical Review organization (see point 11), and dispute procedure. Review procedures should also be agreed on.
- 7.4.4 Written formal type of letters will be in place to notify applicants of the outcome of the equivalence process.
- 7.4.5 The time period to complete this process from application to decision should be around 6 months taking into account the timeframe that each party has to fulfill its respective task, as said in previous clauses of this document.
- 7.4.6 The formal recognition should be publicly available and clearly indicate:
- The EUREPGAP standard(s) and its (their) revision number(s) or date(s)
  - The equivalent standard including all the normative documents involved with their revision numbers or dates.

## **8 Appeals**

FoodPLUS will have written procedures for an independent, impartial and technically competent Appeals Panel to be set up if required and the applicant will have the right of appeal in the cases established in Annex 2

## **9 Transparency and confidentiality**

The operation of all procedures in connection with equivalence will be conducted in a transparent way and all documents will be available to applicants, stakeholders and FoodPLUS at the end of the procedure or sooner.

All the information, procedures and documents issued from the applicant to any of the involved parties in the equivalence process and marked as confidential (with the exception of all information required in Annex 1) shall not be used in any manner except for the aim set up in this document. The rest of the information shall be published.

## **10 Costs**

The applicant scheme owner will be charged for the equivalence procedure according to the currently publicly available fee table published by the appointed external Technical Review Organization. Further fees apply for the contracted Certifiers working within that Scheme and the members of the scheme, according to the EUREPGAP fee table. Application will be open to any standard owner for an equivalent standard.

## **11 Surveillance Auditing**

FoodPLUS or the appointed competent and independent organization will have external audit procedures in place to demonstrate that standard owner is operating the equivalent standard in line with the procedures agreed at the time of application.

## **12 Review and Updates to the Standard**

The benchmarked schemes must advise EUREPGAP when their normative documents are updated and EUREPGAP must inform the benchmarked schemes of any EUREPGAP updates.

FoodPLUS will act according the procedure as in annex 3 to ensure the equivalent standard owner updates the equivalent standard in line with updates incorporated into the EUREPGAP standard within the same time frame and that the status of the equivalent standard follows the transition and is reviewed not less than every 4 years.

## 13 Annex1, Example Proforma Documentation

### 13.1 Proforma: Standards Cross-Reference and Compliance Criteria

EUREPGAP CP AND CC (*)		EUREPGAP STANDARD CP AND CC (TEXT)	EQUIVALENT APPLICANT STANDARD CLAUSE (SECTION) AND LEVEL		EQUIVALENT APPLICANT STANDARD CP AND CC	EQUIVALENT APPLICANT STANDARD	ORIGINAL LANGUAGE EQUIVALENT APPLICANT STANDARD (NOT NECESSARY IF ORIGINAL IS IN ENGLISH)	COMPLIANCE
CLAUSE	LEVEL (**)		CLAUSE	LEVEL (*)				
1 CP			1					
1 CC								
2 CP			2					
2 CC								
3 CP			3					
3 CC								
4 CP			4					
4 CC								
<b>Numeric order</b>			<b>Numeric order</b>					

(\*) CP: Control Point; CC: Compliance Criteria

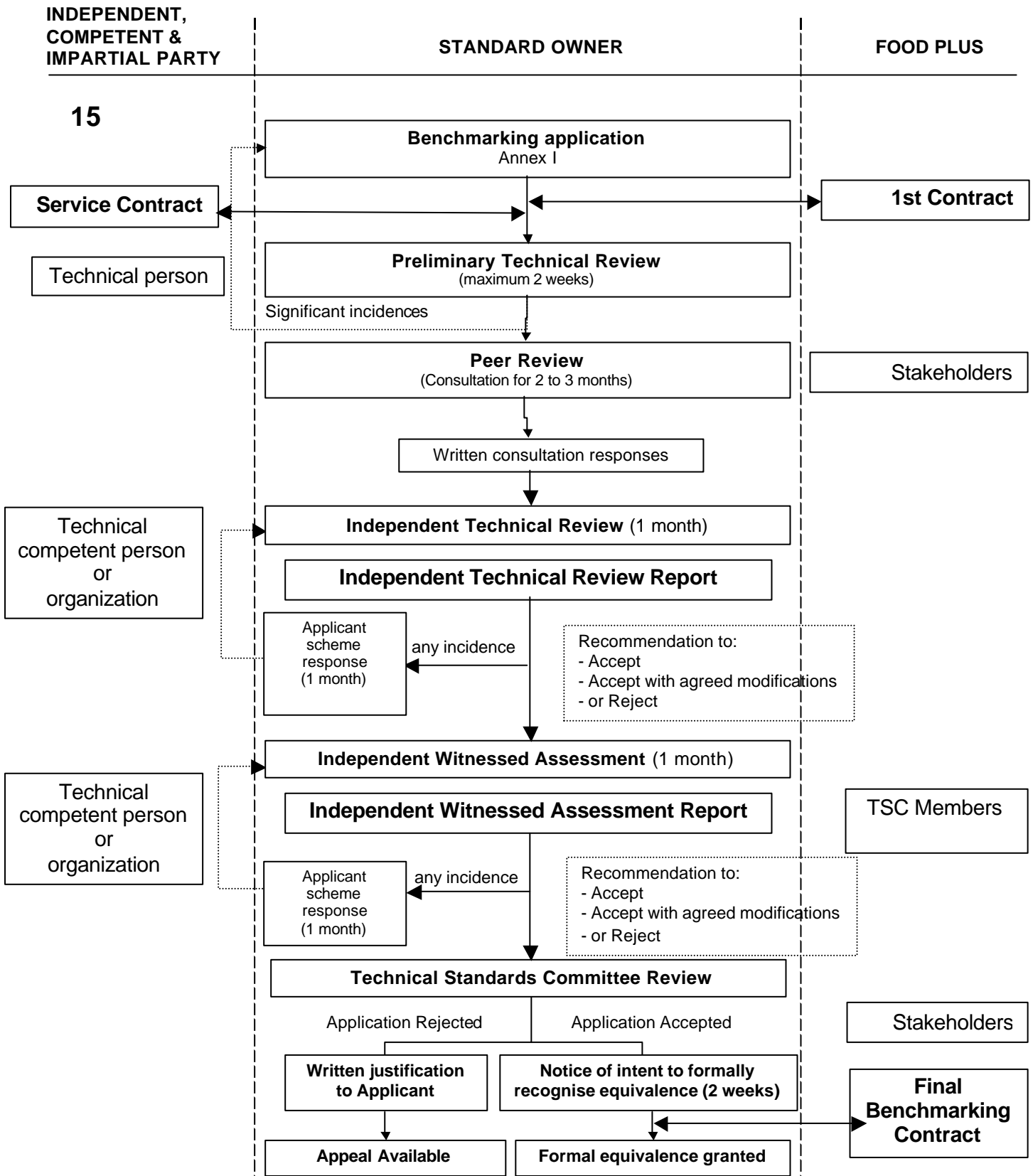
(\*\*) Major, Minor or Should

### 13.2 Proforma: Certification System Cross Reference

EUREPGAP GENERAL REGULATIONS POINT CLAUSE (SECTION)	EUREPGAP GENERAL REGULATIONS POINT (TEXT)	EQUIVALENT APPLICANT STANDARD CLAUSE (SECTION)	EQUIVALENT APPLICANT STANDARD GENERAL REGULATIONS POINT	ORIGINAL LANGUAGE EQUIVALENT APPLICANT STANDARD (NOT NECESSARY IF ORIGINAL IS IN ENGLISH)	COMPLIANCE
1					
2					
3					
4					
<b>NUMERIC ORDER</b>					

## 14 Annex 2, Product Certification Standard Benchmarking Procedure

### 14.1 Standard Benchmarking Flow Diagram



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## **Annex 3, Revision Procedure to handle EUREPGAP Reference**

### **15.1 Management of changes to EUREPGAP**

- 15.1.1 Official changes made to EUREPGAP normative documents must be appropriately included in all the equivalent scheme documentation and certification systems
- 15.1.2 FoodPLUS shall communicate in writing all official changes to all EUREPGAP approved equivalent scheme owners, who must in turn acknowledge receipt using the following format:

Clause (number and text in English)	Control point(s)	Criteria(s)	Major / minor / should
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- 15.1.3 Equivalent scheme owners and certification bodies operating them must implement changes in their documentation within the next 3 months from the date of the official communication from FoodPLUS and communicate to all growers operating the equivalent scheme the new production and/or certification requirements. Implementation and modification of the equivalent scheme for incorporating these changes can be delayed prior presentation to the responsible EUREPGAP TSC of an accepted justification, but no longer than 12 months in total
- 15.1.4 The scheme owner must supply information demonstrating implementation and modification of the equivalent scheme in writing to the independent organization chosen by FoodPLUS to carry out the benchmarking assessment, so that it can be studied and evaluated.
- 15.1.5 Written information must include:
- a) New revision of the complete Scheme Document where changes are considered
  - b) Formats in Annex 1 of this document, covering only with the items affected by EUREPGAP updates.
- 15.1.6 The independent organization shall review the information supplied by the scheme owner and certification bodies, following the review process starting at the level of the Independent Technical Review phase (see annex 2).
- 15.1.7 In the report produced from the Independent Technical Review, a recommendation on the need to carry out (or not as the case may be) a Witnessed Review will be made, on the basis of the importance of the changes and if they affect the certification procedure or not, the decision is then made by the responsible EUREPGAP TSC.
- 15.1.8 The assessment procedure will continue as explained in points 7.3.2, 7.3.3, 7.3.4 and 7.4 of this document and in the Flowchart shown in annex 2.
- 15.1.9 Costs of the assessment process of equivalent schemes to EUREPGAP updates shall be published by FoodPLUS on the basis of fees charged by the Independent Organization in charge of doing the benchmarking.
- 15.1.10 At least once every 4 years, each equivalent scheme owner and their linked certification bodies must complete an internal evaluation on the updating of their scheme and certification systems to EUREPGAP standard. Those studies must be documented by using the formats shown in annex 1 and will be sent to the Independent Organization chosen by FoodPLUS in charge of reviewing the equivalence. The Independent Organization will propose to the TSC whether to approve immediately or conduct an assessment procedure equivalent to the initial benchmarking one, as described in the flowchart shown in annex 2.

## 15.2 Management of changes to EUREPGAP equivalent schemes

15.2.1 Changes to be made on equivalent schemes and/or their certification systems, that are related to the approved benchmarking documents, must be communicated to FoodPLUS before being implemented. The responsible EUREPGAP TSC shall decide upon a recommendation of the appointed, competent and independent organization whether these changes should be:

- a) immediately approved or
- b) reviewed by the Independent Technical Organization in charge of Benchmarking process.

In any case, proposed changes must be set out by using formats shown in annex 1. (Only affected items must be fulfilled).

15.2.2 In case a), the responsible EUREPGAP TSC shall communicate in writing to the owner of the equivalent scheme and/or to the certification body the acceptance of changes.

15.2.3 In case b), the responsible EUREPGAP TSC shall communicate in writing to the owner or the certification body the need to apply for a further assessment by an Independent Technical Review as set out in the main body of this Benchmarking Procedure (see 7.3.2, 7.3.3, 7.3.4 y 7.4).

In this case b, the scheme owner and/or the certification body, within the next 4 weeks from receiving the official response, must:

1. apply for the independent technical review or
2. renounce EUREPGAP equivalence in writing.

15.2.4 The independent organization shall review the information supplied by the scheme owner and/or the certification body starting the process at the level of the Independent Technical Review phase (see annex 2).

15.2.5 In the report produced from the Independent Technical Review, a recommendation on the need to carry out (or not as the case may be) a Witnessed Review will be made, on the basis of the importance of the changes and if they affect the certification procedure or not, the decision is then made by the responsible EUREPGAP TSC.

15.2.6 If once the Independent Technical Organization has reviewed the proposed changes, the conclusion is that they do not match EUREPGAP requirements, and the decision from the responsible EUREPGAP TSC is not accept them, the scheme owner and/or the certification body may:

1. accept the final decision and withdraw the proposed changes to the equivalent scheme, or
2. appeal as set out in clause 8, or
3. renounce EUREPGAP equivalence in writing.

15.2.7 Costs of the process of assessment of proposed changes of equivalent schemes shall be published by FoodPLUS on the basis of fees charged by the Independent Organization responsible for doing the benchmarking.