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# Maximum Residue Limit (MRL) Complaints Procedure

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## Agraya GmbH MRL Complaints Procedure

All stakeholders are invited to submit any suspicious cases, actual, and/or potential non-compliances in regard to GLOBALG.A.P. certification to Agraya GmbH. These complaints are investigated and followed up with a final report for the complainant, including the conclusion of the investigation.

In the case of an MRL exceedance linked to a legal entity with GLOBALG.A.P. certified processes, complaints must be based on a residue analysis by an accredited laboratory. Such cases can be submitted to Agraya GmbH by completing the online form at [Agraya.com/contact/complaints](http:// Agraya.com/contact/complaints), or via e-mail to [mrl@Agraya.com](mailto:mrl@Agraya.com).

### All incoming MRL cases must include the following information:

#### Laboratory analysis:

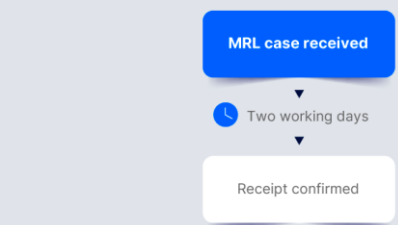
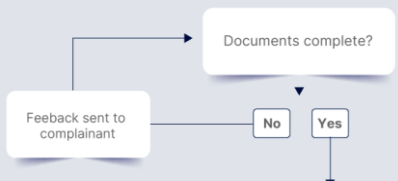
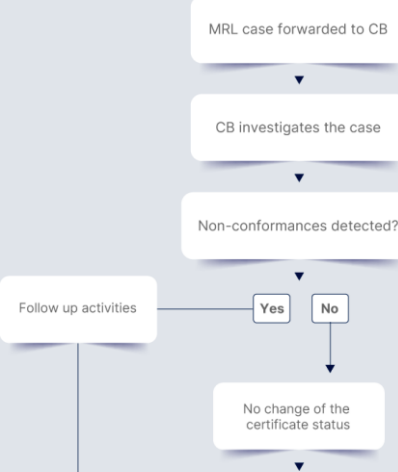
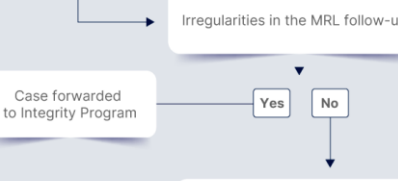
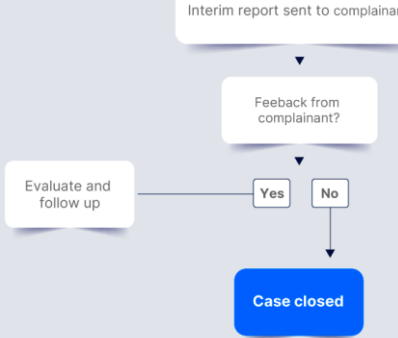
- Documented evidence that laboratories used to analyze parameters impacting food safety are operating in accordance with the requirements of ISO/IEC 17025. The laboratories shall show evidence of participation in proficiency tests or applicable certifications (e.g., the proficiency testing program provider FAPAS®).
- Date of sample taken
- Date of when the analysis was completed
- List of analyzed active ingredients
- Quantification of the amount in the exceedance (ppm)

#### Traceability:

- Clear and legible identification of the origin of the sample (please see Annex I)
- Photos with product packaging label and any relevant traceability information (including transaction documents, e.g., purchase invoice or delivery note for the affected product)

It is important that there is clear traceability to the batch/lot involved in the complaint. Therefore, before starting an investigation, Agraya GmbH classifies the cases according to Annex II. The relevant certification body (CB), in collaboration with Agraya GmbH, will then investigate the MRL cases according to the process shown in the chart below. In addition to a review of the last inspection report, an unannounced (Second Phase) inspection may be conducted to check the traceability system on site, and in case of a producer, the pesticide documentation.

Based on the result and the GLOBALG.A.P. certified legal entity's actions, a report (Second Phase) from the CB is then forwarded to Agraya GmbH. Agraya GmbH monitors the process and in the case of a systematic failure, files the case with the Agraya Integrity Program. A final report is then sent to the complainant.

Process	Responsibility	Comment
	Agraya GmbH	Case number is assigned
	Agraya GmbH	Review of traceability information and analysis report
	Certification body	<p>Investigation based on document check (pesticide documentation, complaints management, traceability) and (un)announced inspection (Second Phase)</p> <p><i>*If any non-conformances are detected, corrective actions are requested and a period of time is given for implementing them (up to 28 days, depending on the severity and food safety risk).</i></p> <p><i>If corrective actions are not implemented in the defined time period, the product is suspended for a defined period of time.</i></p> <p><i>In the case of fraud or if corrective actions to lift suspension are not implemented in the defined time period, producer certification is cancelled.</i></p>
	Agraya GmbH	
	Agraya GmbH	Feedback/Input to other departments, if applicable

## Annex I

### Requirements on traceability information, photos, and analysis report

All key information included in the label (punnet/bag and/or box and/or pallet) of the analyzed sample should be included in the photo of the analysis report or in the information supplied by the complainant:

- Traceability information: Barcode, traceability code, lot number, batch number, etc.
- Legal entity's GLOBALG.A.P. Number (GGN, CoC Number, etc.)
- Identification of the packer (if available)

All key transaction documentation relevant for establishing traceability of the analyzed sample back to the producer (invoices, delivery notes, packing lists, etc.) for the relevant batch, certification status of the product, and the names and addresses of the direct traders/suppliers involved in the supply chain.

**Note:** Please consider that if transaction documents do not include a GGN or CoC Number along with a declaration regarding GLOBALG.A.P. certified status, Agraya GmbH cannot ensure a proper investigation and a successful outcome of it.

#### Packer identification

- If the packer's identification is printed on the label, please include this information (e.g., as a photo of the label).
- If the packer's identification is not printed on the label, please communicate packer's name, address, and country. If the packing process is GLOBALG.A.P. certified, please include the GGN/CoC Number of the packing company (if available).
- Please include all documentation (traceability information, transaction documents, delivery notes, etc.) as evidence that the company has packed the product (if available).

#### Producer identification

- If a GGN is printed on the label, please include this information (e.g., photo of the label).
- If a GGN is not printed on the label, please include information about GGN, GLOBALG.A.P. certification status, and producer's name (if available).

Examples of label photos



1. All identification and traceability information is included



2. Producer GGN and/or identification of the packer is missing



3. Label is illegible



4. No available information linking the sample with a GLOBALG.A.P. certified supply chain

## Annex II

### Case classification

Scenario	Description	Category
1	No analysis	Yellow
2	With analysis Photo of the product label is missing or illegible	Yellow
3	With analysis No traceability information in the analysis No product label	Red
4	With analysis With product label and/or traceability information in the analysis Traceability in the analysis without a direct link to purchase documentation	Yellow
5	With analysis With product label and/or traceability information in the analysis Traceability in the analysis with a direct link to purchase documentation	Green

### Scenario explanation

1. Agraya GmbH receives a complaint without laboratory analysis. In these cases, Agraya GmbH requires the complainant to procure a laboratory analysis. If this is not received within two weeks, the complaint will be rejected.
2. Agraya GmbH receives a complaint including laboratory analysis, but without the product label or with an illegible product label. In these cases, Agraya GmbH requires the complainant to provide the product label or a clearer photo of the product label. If this is not received within two weeks, the complaint will be rejected.

3. Agraya GmbH receives a complaint, including laboratory analysis, but without a product label and traceability information in the analysis report. In these cases, it is not possible to establish a clear connection between the analysis report and the affected product, and the complaint will be rejected.
4. Agraya GmbH receives a complaint, including laboratory analysis, a product label and/or traceability information in the analysis report. However, the traceability in the analysis report and/or the product label does not establish a direct link to purchase documentation of the affected product. In these cases, Agraya GmbH requires the complainant to provide clear traceability evidence to establish a direct link between the analysis and the purchase documentation of the affected product. If this is not received within two weeks, the complaint will be rejected.
5. Agraya GmbH receives a complaint, including laboratory analysis, a product label and/or traceability information in the analysis report and the traceability in the analysis report and/or the product label establishes a direct link to purchase documentation of the affected product. The information received is sufficient. The case will be investigated.

### Category explanation

Green: The information received is sufficient. The case will be investigated.

Yellow: Agraya GmbH will ask the retailer or the retailer's first supplier for more information before starting an investigation. If the required information is not received, the complaint will be rejected.

Red: The complaint will be rejected, and the case will not be investigated.

### Disclaimer

From 1 January 2023, if no GGN/CoC Number of the seller exists on the purchase documentation of the affected product, Agraya GmbH reserves the right not to investigate these cases.