

## Integrity Program

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### 1 Introduction

The Dutch Grazing Foundation is schedule holder of the Meadow Milk Logo. The logo guarantees that the dairy products have been made from meadow milk. This milk is collected and processed separately into a variety of dairy products. The Grazing Foundation determines the conditions for the production process, the transportation and the processing of the meadow milk by Meadow Dairy Companies (MDC's) and for the certification and auditing by Certifying Bodies (CB). One of the Foundation's tasks is to manage and check a full, uniform, independent and impartial process of certification and auditing<sup>1</sup>. In light of this, the Foundation implements an Integrity Program (IP).

#### 1.1 Aim

The aim of the Integrity Program is to safeguard the quality of the scheme and the integrity of parties involved, in addition to agreements and conditions that are already in effect. As such, it contributes to building a strong, reliable and effective certification system.

### 2 Procedure

Activities in the IP include desk reviews, office audits and parallel audits, performed by reviewer(s) and auditor(s) appointed by the secretariat. Each activity results in a separate report (templates in Annexes) including any non-conformities found —classified as major or minor (see text box).

A major non-conformity is raised in cases where the cause of the non-conformity could place the integrity of the Grazing Foundation Certification standard at risk, more specifically when:

1. The Audit duration does not meet scheme requirements;
2. The scope statement is outside Grazing Foundation certification scope;
3. A whole section of the standard is not addressed in the audit;
4. The auditor is not qualified to conduct the audit;
5. A major non-conformity was not closed out prior to certification decision by the certification committee of the CB;
6. A major non-conformity is classified incorrectly.

All other findings raised during the desk review are rated minor.

The secretariat informs the CB about non-conformities, upon which the CB will take all necessary actions to resolve them. The CB will prepare a corrective action plan (CAP), which includes: root cause analysis, CA's, responsible person and date of implementation (template in Annex A). The CAP provides justification for a satisfactorily closure of the non-conformity within the set deadline (see below). The CAP should be delivered to the secretariat within five working days in case of a major non-conformity. For a minor non-conformity the term is four weeks.

<sup>1</sup> Article 2.1 General Terms and Conditions for Grazing and Meadow Dairy Products of the Grazing Foundation

A non-conformity is closed with a CA by the CB and a verification of the CA by the reviewer or auditor based on the provision of objective evidence of the CA. Major non-conformities should be closed within four weeks after notification of the findings of the review or audit, minor non-conformities should be closed within six months. The reviewer or auditor finalises the report by completing the non-conformity sheet. He or she forwards the finalised report to the secretariat. The secretariat and the Executive Board of the Grazing Foundation are entitled to verify the findings of the report.

The secretariat of the Grazing Foundation has a coordinating role in the execution of the Integrity Program. In addition to the actions set out above, the secretariat of the Grazing Foundation:

- Will inform the CB that a delivered audit is selected for a desk review;
- Will inform the MDC that the company is selected for an unannounced parallel audit;
- Will inform the CB that the CB is selected for an office audit;
- Will appoint the reviewer(s) and auditor(s) to execute the activities in the Integrity program, making sure that they are competent to carry out set tasks;
- Will decide on the frequency of the activities in the Integrity program.

### **3 Desk review**

For a desk review the secretariat requests the CB to submit within 2 weeks the following documents:

1. The Grazing Certificate;
2. The Control Plan and linked documents;
3. The Audit report and linked documents;
4. The Audit time calculation justification;
5. The Certification Agreement;
6. Evidence of auditor qualification;
7. Any other documents related to the audit that the CB wishes to share for the desk review.

The reviewer will record his or her findings in a desk review report (template in Annex B).

### **4 Office audit**

An auditor appointed by the secretariat conducts the office audit. The following conditions apply:

- The secretariat sets the date of the office audit.
- The office audit takes place on working days during normal working hours.
- Participation by the CB to the office audit is mandatory.
- The CB is notified 48 hours in advance on working days, by the secretariat, about the intended office audit.

The auditor will record his or her findings in an office review report (template in Annex C).

### **5 Parallel audit**

An auditor appointed by the secretariat conducts the parallel audit. The following conditions apply:

- The secretariat sets the date of the unannounced parallel audit.
- The unannounced parallel audit takes place on working days during normal working hours.
- Participation of the MDC to the unannounced parallel audit is mandatory.

- The MDC is notified 48 hours in advance on working days, by the secretariat, about the intended unannounced parallel audit.
- The MDC can refuse the unannounced parallel audit in case of maintenance work that makes the execution of the audit impossible or because there is no production in case of seasonal production. In that case the secretariat shall propose a new date for the audit, which cannot be refused.
- The MDC will be informed about any non-conformities that were raised during the parallel audit in a closing meeting between the auditor and the audited MDC.

The auditor will record his or her findings in an parallel audit report (template in Annex D).

## 6 Sanctions

If a CB fails to comply, the case will be presented to the Executive Board of the Foundation by the secretariat. The Executive Board will be asked to take a decision based on the information provided by the secretariat. The decision of the Executive Board is binding.

The following sanctions apply:

- Warning: The CB will get a final warning from the Executive Board of the Grazing Foundation with which they are required to comply.
- Compliance audit: An office audit by an appointed auditor. The CB must bear the costs for this audit.
- Suspension: A suspension of the CB is valid for 3 months in which period the CB has to show through written evidence or an office audit that it complies. In this period the CB may not issue any new certificates or perform new Audits. The suspension will be published on the Foundation website.
- Termination of agreement: The Executive Board of the Grazing Foundation can decide to terminate the agreement with the CB if the CB fails to close out the non-conformities within the 3 months suspension period. In case of termination all pending obligations for the CB towards the Foundation remain valid. Upon request from other CB's the CB shall cooperate in order to transfer the certificates. The termination of the agreement will be published on the Foundation website.

## 7 Appeal

A CB can appeal against the findings of the integrity program or a sanction issued by the Executive Board of the Grazing Foundation. The appeal must be filed within four weeks from the date of the integrity program report or the sanction decision by the Executive Board of the Grazing Foundation.

The Executive Board of the Grazing Foundation will appoint an independent expert to investigate the appeal and advice the Board on a decision. After receiving the advice of the independent expert the Executive Board of the Grazing Foundation will decide on the appeal of the CB.

**Annex A; Corrective action plan template**

<b>Auditor/reviewer:</b>	<input type="checkbox"/> Desk review: report no.: <input type="checkbox"/> Office audit: audit date: <input type="checkbox"/> Parallel audit: audit date:
<b>Certifying Body:</b>	<b>Location:</b>
<b>Date of notification:</b>	<b>Standard &amp; Clause:</b>
<b>Person responsible for the CA:</b>	<b>Planned date of implementation of CA:</b>
<b>Description of NC/Details:</b>	
<b>Root cause:</b>	
<b>Corrective action:</b>	
<b>Objective evidence of CA:</b>	

## Annex B; Desk review report template

Desk review report	Report no.	
	Desk reviewer	
	Date	

General	Details		NC
Certifying Body (CB)			
Meadow Dairy Company (MDC)			
Address Meadow Dairy Company			
Date of Audit			
Audit purpose	Certification	Surveillance	
Date of previous Audit			
Audit purpose previous Audit			
Audit duration			
Audit team members			

Details of certificate	Assessment	NC
Certificate number		
Issue date		
Scope of certification		

Summary of CB audit	Assessment	NC
Audit purpose		
Audit report		
Minor non-conformities		
Major non-conformities		
Tracking & tracing exercise		
General remarks		
Corrective action plan		
Corrective actions		
Assessment of previous audit NC		

<b>Audit details</b>	<b>Assessment</b>	<b>NC</b>
Scope statement		
Audit duration		
Audit program		

<b>General audit requirements</b>	<b>Assessment</b>	<b>NC</b>
Audit conclusion		
Overview of changes		
Overview of complaints		
Overview of recalls		
Confirmation that the Meadow Milk objectives have been achieved.		

<b>Non-conformity sheet</b>				
<b>NC no.</b>	<b>Classification</b>	<b>Requirement</b>	<b>Description of non-conformity</b>	<b>Closed/date</b>

### Annex C: Office review report template

Office audit report	Report no.	
	Auditor	
	Date	

<b>Certification body</b>	
Name	
Address	
Country	

<b>Audit team</b>	
Auditor 1	
Auditor 2	
Auditor 3	

<b>Audit details</b>	
Audit objective	
Audit date	
Man-days	

<b>Audit details previous audit</b>	
<i>Objective evidence of closure of findings of previous audits.</i>	
Audit date previous audit	

<b>Audit details</b>						
no.	Requirement	Documented	Implemented	Monitored	Evidence	OK
1	Legal status and structure					
2	Organizational chart					
4	Policy statement					
5	Quality manual					
6	Evaluation conformance with Meadow Milk Standard Internal audit					
7	Meadow Milk Foundation to be informed of changes					
8	Register of certification personnel					
9	Certification process					
10	Management review					
11	Document control					
12	Recruitment of personnel					

13	Responsibility and accountability					
14	Subcontractors					
15	Procedure for dealing with non-conformities					
16	Procedure for withdrawal, suspension of certificates					
17	Appeals, complaints and dispute					
18	Management of change					
19	Means of financial support & fees					
20	Use of logo and marks					
21	Register of certificates					
22	Confidentiality and independence					

Summary of audit findings	
Major non-conformities	
Minor non-conformities	
Opportunities of improvement	
Unresolved issues	<i>If applicable. Any unresolved issues if identified by the auditor.</i>

<b>Audit conclusion</b>
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Non-conformity sheet previous audit				
NC no.	Classification	Requirement	Description of non-conformity	Closed/date

Non-conformity sheet				
NC no.	Classification	Requirement	Description of non-conformity	Closed/date



### Annex D; Parallel audit report template

Parallel audit report	Report no.	
	Auditor	
	Date	

General	Details		NC
Certifying Body (CB)			
Meadow Dairy Company (MDC)			
Address Meadow Dairy Company			
Date of Audit			
Audit purpose	Certification	Surveillance	
Date of previous Audit			
Audit purpose previous Audit			
Audit duration			
Audit team members			

Details of certificate	Assessment	NC
Certificate number		
Issue date		
Scope of certification		

Summary of CB audit	Assessment	NC
Audit purpose		
Audit report		
Minor non-conformities		
Major non-conformities		
Tracking & tracing exercise		
General remarks		
Corrective action plan		
Corrective actions		
Assessment of previous audit NC		

Summary of parallel audit	Assessment	NC
Audit purpose		
Audit report		
Minor non-conformities		

Major non-conformities		
Tracking & tracing exercise		
General remarks		
Corrective action plan		
Corrective actions		
Assessment of previous audit NC		

General audit requirements	Assessment	NC
Audit conclusion		
Overview of changes		
Overview of complaints		
Overview of recalls		
Confirmation that the Meadow Milk objectives have been achieved.		

Non-conformity sheet				
NC no.	Classification	Requirement	Description of non-conformity	Closed/date