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CONTROL PLAN

OF THE SPIRIT DRINK

'GRAPPA' GI

STATUS OF REVISIONS

Date of approval	Revision	Reason for revision
	0	First emission
Drafted	**Verified**	**APPROVAL**
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PREMISE

Ministerial Decree No 5195 of 13 May 2010 implementing Regulation (EC) No n.110/2008 of the European Parliament and of the Council of 15 January 2008 (repealed and replaced by Regulation (EU) 2019/787) on the definition, description, presentation, labelling and the protection of geographical indications of spirit drinks requires the control body to submit to the ICQRF a specific control plan drawn up on the basis of the specification for the geographical indication.

This document, drawn up on the basis of the EU regulations and the national legislation in force, describes all the checks (documentary, inspection and analytical) to be carried out along the 'Grappa' GI sector so that compliance with the product specification is ensured and can be marketed under the corresponding designation.

The checks can be divided into:

- self-checking: corresponding to the activities of measuring and analysing, checking, recording and storing documents carried out by producers of raw materials, processors (distilleries and liqueurs) and packagers against compliance requirements;
- compliance checks carried out by the appointed CB, corresponding to documentary and inspection checks carried out on the operators' process/structures, and analytical tests on the product.

In this connection, it should be noted that the control plan should refer to the requirements of the specification and, where possible, should not repeat the provisions of the specification for the spirit drink in full.

The inspection plan is published on the ADM-Cert website, distributed to operators in the supply chain, technical inspectors and ADM-Cert staff.

TECHNICAL DOCUMENT

'IG GRAPPA'

Summary

1 MAIN REFERENCE LEGISLATION

- Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official control and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products.
- Single text of the legislative provisions concerning taxes on production and consumption and related criminal and administrative penalties approved by Legislative Decree No 504 of 26/10/1995, as amended.
- Decree No 153 of the Ministry of Finance of 27 March 2001 laying down provisions for monitoring the manufacture, processing, movement and storage of ethyl alcohol and alcoholic beverages subject to the excise duty arrangements and for carrying out fiscal supervision of methyl, propyl and isopropyl alcohols and alcohol raw materials.
- IEC EN 17065: 2012 'Requirements for bodies certifying products, processes and services'.
- EN ISO/IEC 17025: 2018 'General requirements for the competence of testing and calibration laboratories'.
- Regulation (EU) 2019/787 of the European Parliament and of the Council of 17 April 2019 on the definition, description, presentation and labelling of spirit drinks, the use of the names of spirit drinks in the presentation and labelling of other foodstuffs, the protection of geographical indications for spirit drinks, the use of ethyl alcohol and distillates of agricultural origin in alcoholic beverages, and repealing Regulation (EC) No 110/2008.
- Commission Delegated Regulation (EU) 2021/1235 of 12 May 2021 supplementing Regulation (EU) 2019/787 of the European Parliament and of the Council with rules on applications for registration of geographical indications of spirit drinks, amendments to product specifications, cancellation of the registration and the register
- Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25/10/2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004
- Ministerial Decree of the Ministry of Agricultural, Food and Forestry Policy of 13 May 2010, Decree No 5195 implementing Regulation (EC) No 110/2008 of the European Parliament and of the Council of 15/01/2008 on the definition, description, presentation, labelling and the protection of geographical indications of spirit drinks.
- Technical file/Specification for the 'Grappa' GI: MIPAAF Decree adopting GI specification No 747 of 28/01/2016 Implementation of Article 17 of Regulation (EC) No 110/2008 of the European Parliament and of the Council of 15/01/2008 on the definition, description, presentation, labelling and the protection of geographical indications of spirit drinks – technical file for the GI 'Grappa'
- Legislative Decree No 231 of 15 December 2017. Rules on penalties for infringement of the provisions of Regulation (EU) No 1169/2011 on the provision of information on

food for consumers and the adaptation of national legislation to the provisions of Regulation (EU) No 1169/2011 and Directive 2011/91/EU, pursuant to Article 5 of Law No 170 of 12 August 2016 'European Delegation Law 2015'.

- Law No 238 of 12 December 2016 – Organic rules on vine cultivation and wine production and trade, and in particular Article 70 (11) on penalties for the spirit drinks sector.

2 TERMS AND DEFINITIONS

Excise	Indirect taxation on the production or consumption of ethyl alcohol and alcoholic beverages.
ADM-Cert	Certification Sector of the Customs and Monopolies Agency – Control Body designated by MASAF for the control of the 'Grappa' GI.
Excise duty register	Database in which every operator active in the sector subject to excise duty is registered.
Approval of label and packaging arrangements	The act by which ADM-Cert, or a producer association or recognised protection institute/consortium, assesses the compliance of the labelling device with the product specification and the MASAF provisions.
Control activities	Documentary review, inspection and/or test carried out by ADM-Cert through which ADM-Cert verifies compliance with the 'Grappa' GI compliance requirements specified in this control plan for the purpose of issuing the attestation of conformity.
Self-checking	Checks and documentation carried out by operators in the 'Grappa' GI production chain, which makes it possible to provide objective evidence of compliance with the reporting requirements specified in the product specification.
Competent authorities	They are the competent authorities in the various areas covered by this control plan (MASAF – ICQRF, Customs Agency, Regional Administrations for the territory under their responsibility, ASL, etc.).
Supervisory authorities	ICQRF Department of the Central Inspectorate for Quality Control of Agri-food Products.
Remedial action	A set of actions taken by the operator to eliminate the causes of non-compliance.
Certificate of distilled analysis	Document issued to operators by the Customs and Monopolies Agency, as part of its institutional activities for tax purposes, summarising the chemical and physical analyses carried out on the distillate known as the 'full degree'. This analytical certificate states whether the distillate eligible for 'Grappa' GI meets the chemical/physical and traceability requirements.

'Grappa' GI certification	Act by means of which ADM-Cert attests that the product complies with the specification for the 'Grappa' GI.
Authorised warehousekeeper	Holder and person responsible for managing the tax warehouse.
Tax warehouse	A facility where excise goods are manufactured, processed, held, received or dispatched under a duty suspension arrangement, under the conditions laid down by the Tax Administration.
Specification (formerly Technical Sheet)	The dossier attached to the application for protection of a geographical indication setting out the requirements with which the spirit drink must comply and which was referred to asa 'technical file' in accordance with Regulation (EC) No 110/2008.
Distiller	A professional person whose principal activity is the operation of a distillery carried out under a tax warehouse or operating under a flat-rate scheme charged in the excise register as a 'production establishment'.
ICQRF	Department of the Central Inspectorate for Quality Protection and Fraud Prevention of Agri-food Products.
Bottler/Conditioner/C Packaging	Identified entity which assumes the obligations and responsibilities laid down for the distiller, who packaging the 'Grappa' GI, assumes the same obligations and responsibilities as the producer (distiller).
Geographical indication	Definition in Article 3 (4) of Regulation (EU) 2019/787, as amended
Inspector ADM-Cert	Qualified person responsible for carrying out the control activities (documentary, inspection and sampling) provided for in the control plan at the premises of the operators subject to the checks.
Chemical Laboratory	Chemical laboratory identified by the operator for the specific tests required for GI for own-check analyses.
Accredited chemical laboratory	Chemical laboratory accredited according to standard UNI CEI EN ISO/IEC 17025 used by ADM-Cert for certification purposes.
Ageing warehouse	Warehouse or container made in such a way that it cannot be accessed without leaving traces, sealed by the Customs Office (formerly UTF), in which the 'Grappa' GI is aged.
Methods of analysis	Test methods to be used to verify the chemical, physical and organoleptic parameters laid down in the product specification. Analyses shall be carried out using the methods of

	Union reference (e.g. Regulation (EC) No 2870/2000 et seq.) and the relevant international methods.
MASAF	Ministry of Agriculture, Food Sovereignty and Forestry.
Non-conformities (NC)	Failure to meet the requirements laid down in the product specification for the production process, raw material and/or product, or failure to comply with the provisions of the Control Plan.
Serious non-conformity (serious CN)	Non-conformities that lead to the exclusion of the raw material and/or the product and affect the certibility of the product itself.
Minor non-conformity (minor NC)	Non-conformities which do not affect the certification of the product itself.
Repeated non-conformity (CN) for the same case	Repeated CN for the same case means CN for the same category ID in Table 4. The number of repeated NC influences the risk class in the Risk Analysis (Table 7).
Notification of compliance analysis	Document by which ADM-Cert notifies the operator in the chain of the analysis report sent by the accredited chemical laboratory confirming whether or not the products tested (raw materials or finished products) comply with the requirements laid down in the specification.
JCO	Authorised control body or designated public authority.
Packaging/bottling mill	Premises registered in the excise register by the Customs Office, where products may be placed under suspension of excise duty (tax warehouse) or subject to excise duty (free warehouses), where the GI is bottled.
Processing or processing mill	The premises listed and present in the excise register by the Customs Office, where products may be placed under suspension of excise duty (tax warehouse) or subject to excise duty (free warehouses), where the spirit drinks are diluted, sweetened, blended, i.e. subjected to all appropriate practices to make the GI 'Grappa' ready for bottling and subsequent release for consumption.
Producer/producer of raw materials (e.g. grape marc or wine lees and/or other specific fermentable or non-GI ingredient)	Any natural or legal person or group of such persons who delivers by-products of winemaking to a distillery or producer of another product or fruit that can be used for GI purposes.
Requirement	Provision in the control plan setting out the requirements to be met and complied with in order to comply with the specification.

Processor/Processor	Operator identified by ADM-Cert, who processes, processes and/or packaging and/or ageing the GI, in accordance with the specification, in order to make the product in bulk suitable for use as a GI ready for bottling.
Treatment of non-compliance	Removal of the non-compliance in order to restore the compliant situation.
Significant changes	Variations requiring additional inspection in order to assess whether the changes made comply with the compliance requirements laid down in the specification and in the control plan.
Surveillance inspection visit	Control activities by means of which ADM-Cert ensures that the requirements, process and product compliance are maintained, as well as all the requirements specified in the control plan and the specification.
Initial inspection visit	Control activities by means of which ADM-Cert checks compliance with the requirements laid down in the specification in order to include the operator in the list of operators checked.

3 ENTRY INTO THE CONTROL SYSTEM

The operators subject to the requirements of the control plan and actually present in the 'Grappa' GI chain are producers/producers of raw materials, distillers, processors (processors), ageing warehouses and bottlers.

Traders subject to excise legislation are compulsorily authorised and recorded in the excise register and in the Community register (SEED).

The procedures for applying for, verifying and issuing the operating licence vary according to the occupation and operating methods chosen and performed by the applicant company.

The request shall be submitted to ADM-Cert either directly by the applicant or alternatively by the recognised producer association/protection institution/consortium.

With the exception of producers/producers of raw material, ADM-Cert, at the time of registration, issues an identification code (ID) to the operator in the chain, as detailed below. However, a unique ID code will be issued to the operator carrying out more than one activity. In the event that the operator delegates to the producer association/protection institution/recognised consortium the submission of his application for membership by delegation relating also to economic relations, the latter must provide ADM-Cert with a declaration clearly stating that the applicant is responsible for any failure to fulfil obligations. In any case, the request must be signed by the operator.

Registration and maintenance within the control chain shall be subject to the payment of a fixed annual fee to be paid by 31 January each year. Only one quota per operator is due (corresponding to the highest tariff of the various coated figures), except in cases where the parties submit applications for different locations.

In cases of simultaneous registration in the GI control system and of one or more GIs 'with more restrictive or partly overlapping parameters' (e.g. Grappa e Grappa regionale), payment of the quota

of entry in one of the aforementioned control systems paid for the registration fee of the other and/or the others. In such cases, the control body must also ensure the interoperability of information systems in order to enable a batch of products already designated with a regional grappa GI to be reclassified as 'Grappa' (Section 7.2).

Producer/supplier of raw material

All those who deliver raw material suitable for processing into GI, i.e. grape marc and lees obtained from the vinification of grapes produced and made into wine in Italy, are included in the same GI.
The supplier of the raw material accesses a qualification from the companies receiving the product (distillery/processor operating in the production area provided for in the product specification); the establishment provides ADM-Cert with the supplier's registration sheet if requested.

If the name of Grappa IG is supplemented by the additional terms referred to in point 2 (g) of the specification, ADM-Cert acquires from the operators the information enabling verification of the origin of the raw materials. In particular, if raw materials from DOC, DOCG or IGT wine are used, ADM-Cert acquires from the operators receiving this raw material the list of parties registered in the controlled chain and carries out the necessary checks on the permanence of the product via the competent certification body. ADM-Cert shall notify the approved inspection body for DOC/DOCG/IGT wine by 31 January of the following year of the names of the producers who have delivered the specific raw material for the spirit drink GI.

Distillers, Transformers/Processors, Botttifiers

All operators operating in the production area referred to in the 'Grappa' GI specification, who are listed in the excise register of the Customs and Monopolies Agency, may submit an application for membership. They carry out, as their main activity, production establishment, processing or processing mill and/or packaging/bottling mill, or 'Ageing Warehouse'. Operators wishing to join the 'Grappa' GI send ADM-Cert the application for first membership duly completed in full using the forms on the Customs and Monopolies Agency's webpage.
The bottler operating outside Italy must also apply for inclusion in the chain.

Ageing warehouses

Where different from the above operators (distillers, processors, processors, bottlers) who wish to join the 'Grappa' GI, the ageing warehouses send ADM-Cert the application for first accession, duly completed in full, using the forms on the website of the Customs and Monopolies Agency.
During the initial application of the control plan, the ageing tanks, which by their nature carry out multiannual activities, are also checked by ADM-Cert for the future possibility of bottling the 'Grappa' GI, and the activity must be deemed to be automatically authorised from year to year in the presence of 'Grappa' GI batches within those warehouses. All the product in the ageing stores will be checked at document level and for the purpose of certification of the product.

4 PROCEDURE FOR RECOGNITION AND PLANNING OF CONTROL ACTIVITIES

4.1 Documentary assessment of the request for first accession.

Upon receipt of the application and the ancillary documentation envisaged, ADM-Cert shall verify the completeness and conformity of the request within 15 working days from the date of receipt.
The assessment may include the following situations:

Presentation of the dossier to ADM-Cert by the operator	Situations	Order
Application correctly submitted and operator with the characteristics laid down in the product specification	Request accepted	ADM-Cert shall, within 15 working days, assess the operator according to the professional figure and the sector concerned.
Incomplete application or operator not having the characteristics laid down in the product specification	Request suspended	ADM-Cert suspends the registration of the operator in the chain and informs him of the necessary additions within a reasonable time for inclusion in the chain.
Unquestionable request for failure to comply with the requirements	Request rejected	ADM-Cert informs the Trader of the reason why the request has been rejected.

4.2 Control of the operator in the chain

After acceptance of the application, ADM-Cert assesses, prior to the production/processing and packaging of the 'Grappa' GI, for the category to which the operator belongs:

The correspondence of what is stated in the application, the suitability of the operator and the ability to meet the compliance requirements set out in the product specification for the specific activities carried out by the applicants;

4.3 report any structural, documentary and objective problems encountered and assess the corrective actions proposed by the operator;

C shall inform the operator of the approval.

The checks for the initial recognition are planned in accordance with Table 1 below.

In the case of inspections of packaging plants located outside the national territory, the procedures will be assessed individually in the light of the country concerned.

Table 1

Type of operator	Time of inspection	Frequency of checks	Type of control	Requirements
Producer/producer of raw material (lees and grape marc)	entry and in case of substantial changes	100 % of applicants (verification by distillers)	Documentation (from records/transport documents collected by the distiller)	verification of origin and compliance with regulated requirements; product traceability

				(Specification of Annex Points 1 and 2 (e)
Distiller Transformator/Computer	entry and in case of substantial changes	100 % of applicants	Documentation and inspection	Location of installations; compliance with the requirements laid down in the product specification; product traceability (Specification
Packer (s)	entry and in case of substantial changes	100 % of applicants	Documentation and inspection	Compliance with the requirements laid down in the product specification; product traceability (Specification
Warehouse of Ageing	entry and in case of substantial changes	100 % of applicants	Documentation and inspection	Location of installations; Compliance with the requirements laid down in the product specification; product traceability Specification

In the checks provided for in the first accession, the checks carried out by ADM for tax purposes carry out the inspections provided for in this Control Plan as operators already registered and included in the Excise Register.

ADM-Cert's inclusion in the list of operators checked is based on inspection reports (see section 20). Any changes to the data contained in the membership application must be notified to ADM-Cert within 15 days of their occurrence.

If the assessment is positive, ADM-Cert shall enter the operator in the list of operators checked (which it publishes on its website for information) within 15 days of the date indicated in the inspection report sent by the technician to ADM-Cert and in any event within 60 days of receipt of the applications for membership. Applications for membership by packagers must be evaluated within 30 days of receipt.

If the assessment is negative, ADM-Cert shall communicate the problems encountered and the requests for adjustment. ADM-Cert may carry out an additional inspection activity in order to verify the operator's compliance with the requirements laid down in the specification following the

problems encountered. Operators who do not meet the requirements laid down in the specification are not included in the list of operators checked.

5 MONITORING ACTIVITIES IN ORDER TO MAINTAIN THE REQUIREMENTS

ADM-Cert carries out the verification, including by checking that the condition of the facilities, the storage facility and the undertaking correspond to what was reported and authorised at the time.

Maintenance within the control chain shall be subject to the payment of a fixed annual fee to be paid by 31 January each year. In the case of operators engaged in more than one activity, the verification will be unique for all the activities carried out as well as the annual fee applied (corresponding to the highest tariff of the various types of activity).

The checks shall be documentary, physical and analytical. The inspection must be carried out at the same time as the production/processing activities; if, due to exceptional (duly documented) reasons, this is not possible, it will be done on a documentary basis. The parties registered in the control system must therefore keep for at least one year all the documentation resulting from their own checks and make them available for additional compliance checks carried out by ADM-Cert.

In the case of operators carrying out more than one activity, the verification will be unique for all activities carried out. Table 2 below shows the annual frequency of inspections that will be applied for the first 3 years of submission to the control plan.

From the fourth year onwards, the checks will be carried out in accordance with the risk analysis (AdR) set out in the Annex hereto. At the end of the first year of application of the AdR, ADM-Cert will review the results of this activity.

Table 2

Type of operator	Time of inspection	Control frequency	Requirements
Producer/producer /holder of raw materials (lees and grape marc)	retention	35 % per year of operators for the first three years and subsequently on the basis of risk analysis	product traceability (by-products of winemaking) (Specification of Annex Points 1 and 2 (e)
Distiller/Transformator/Processor/Ageing Warehouse	retention	35 % per year of operators for the first three years and subsequently on the basis of risk analysis	Regulated process steps; product traceability (Specification of Annex Points 1. and P.to 2. Points (c), (d)
Packer/bottler	retention	35 % of operators per year for the first three years, based on risk analysis	Regulated process steps; product traceability (Specification of Annex Point 2. Point (g)

Type of operator	Time of inspection	Control frequency	Requirements
Product Finito	Own-check analysis	100 % production batches declared GI ready for packaging (to be paid by the operator)	Chemical, physical and organoleptic parameters; batch traceability (Specification Annex Point 1.
Product Finito	Analysis by ADM-Cert	*1 **2 Capacity less than/equal to 10.000 litres hydrate: 1 unannounced sampling and analysis per year Production capacity from 10 .001 to 20.000 litres hydrate: 2 unannounced sampling and analysis per year Production capacity from 20.001 to 100.000 litres hydrate: 3 unannounced sampling and analysis per year Production capacity from 100.001 to 400.000 litres hydrate: 4 unannounced sampling and analysis per year Production capacity beyond 400.000 litres hydrate: 5 unannounced sampling and analysis per year on the product ready for bottling for which the operator already holds the test certificate obtained following own checks. Then, from the fourth year, on the basis of the risk analysis.	Organoleptic chemical-physical parameters; batch traceability (Specification Annex Paragraphs 1 and 2. (A) (b)

For the purposes of calculating 'production capacity', depending on the operator who assumes responsibility for certification, only the production of the spirit drinks 'Grappa', 'Grappa invecchiata' and 'Grappa Riserva' must mean:

[1] 'Production capacity' referred to therein means the quantity of 'Grappa' GI certified in the previous year.

[2] The sampling numbers in this column are to be understood as meaning that the fixed annual number of off-takes carried out by ADM-Cert must be equal to that number: in addition, where appropriate, the samples taken during the additional visits pursuant to paragraph 5.1 shall be added.

- Distillery: the quantity produced and found to be contradictory with the customs office in the financial year relating to the previous financial year, as shown in the accounts kept for excise purposes;
- Computer: the total quantity of product processed in the financial year for the previous financial year as shown in the accounts and processing sheets;
- Packager/Bottler: the total quantity of product packaged in the financial year for the previous financial year as shown in the accounts and bottling sheets.

For operators carrying out more than one activity, only the volumes of the main activity will have to be taken into account, not combining the 'production capacities' referred to in the previous period.

5.1 Additional inspection visits to the regular annual programme of checks

ADM-Cert may carry out additional inspection visits:

- in the case of documented reports of detected irregularities affecting operators;
- in the case of identified serious non-compliances found against the operator;
- in cases where the operator has not provided ADM-Cert with data communications (failure to respond to reminders) and whenever reasonable doubts arise as to the compliance of the product/process with the requirements (e.g. repetition of the same CN, communication to ADM-Cert of significant variations that may affect traceability, product characteristics with respect to the conformity requirements, changes in the state of construction, storage, etc.).

6 PERMANENCE IN THE CONTROL SYSTEM

In the absence of a specific notification of withdrawal from the 'Grappa' GI control system, the operator is deemed to be permanently included in the chain system and is obliged to pay the quotas laid down in the tariff for ADM-Cert. ADM-Cert will clearly inform the operator when entering the control system.

7 RECORDS, SELF-CHECKS AND OBLIGATIONS OF OPERATORS

7.1 General obligations of operators

A. verify the compliance requirements laid down in the control plan and the specification and carry out the required records (processing records, registers, transport documents, etc.);
B. carry out all the adjustments required by ADM-Cert in order to achieve the requirements of the CP;
C. keep records of products, whether raw materials, semi-finished products or finished products, so that non-compliant products are excluded from the GI protected circuit;
D. manage and archive the documentation provided for in the control plan in order to facilitate checks by ADM-Cert and the official control authorities;
E. keep all documentation concerning the GI at the holding for at least 5 years from the date of issue;
F. immediately inform ADM-Cert, and in any case within 3 days of the event.

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verification, all the results of the checks carried out by the competent administrative or judicial authorities, to the extent that they may affect the certification of the GI product (batch). These results will be assessed by ADM-Cert for the purposes of risk analysis;

G. keep the raw materials and the processing processes of products designated as 'Grappa' GI separate in time and/or spatial. Compliance with the separation of products must be properly documented by operators through the business records required by excise legislation.
H. All operators not subject to the obligation to telematise EDI excise duties (e.g. flat-rate operators, processing plants subject to excise duties, etc.) shall notify the inspection body of the start and end of the processing of each certified batch, in order to enable the quantity to be determined and the sample taken, where appropriate, in accordance with Table 2.

7.2 Specific obligations of operators

Chart Distillators

A. The distiller must take over the raw materials for alcohol after verifying that they meet the requirements of the specification and only if they are accompanied by the required documentation correctly completed for the purposes of the GI. Distillers submit the raw materials to processing, register, store the 'full degree' distillate obtained and submit it to the competent customs office for checking (quality and quantity) and taking the sample by officials of the Customs and Monopolies Agency (Agenzia delle Dogane e dei Monopoli) on the plant subject to the control of GI production for the purposes of official controls for the purpose of determining excise duties. The distiller receives the result of the assessment carried out by means of the delivery report containing the relevant test certificate.
B. In the case of transfer of flemme (aqueous alcohol solution obtained from simple distillation of lees and grape marc) between different distilleries, these must be accompanied by documentation drawn up by ADM officials during institutional activities and by any other documentation relevant to the traceability/traceability of the batch.

Cider makers

A. If the processors are different from the distiller, they must ensure, at the acceptance stage, that the batch of the beverage likely to become 'Grappa' GI is accompanied by the correct accompanying documentation and the certificate of analysis of the distillate at all levels.
B. they process quantities of product capable of becoming 'Grappa' GI (referred to in point A) into 'Grappa' GI in accordance with the requirements laid down in the specification.
C. hold the finished 'Grappa' GI ready for control analysis in separate tanks suitable for sampling (both self-checking and by ADM-Cert).
D. In the case of sampling for analysis by ADM-Cert, after sampling, the packaging batches must no longer undergo any process that could alter their chemical, physical and organoleptic characteristics or be mixed with other batches of the beverage.
E. It is the responsibility of each operator to check the transport or replacement documentation and sign it as

recording of the check carried out.
F. For GIs (e.g. 'Grappa regionale') for which the characteristics comply with the specification of another GI (e.g. 'Grappa' GI), the operator may decide to reclassify the GI beverage by fully notifying the batch documentation to ADM-Cert.

KBottoners

A. If the bottler is different from the processor, it must ensure that the batch of the 'Grappa' GI is

accompanied by the correct accompanying documentation, including that relating to own checks.

B. It is the responsibility of each operator to ensure that the GI drink, obtained from processors registered with the GI, is packaged. Lists of registrants can be requested from ADM-Cert or consulted on its website.

C. In the case of bottling outside Italy, foreign bottlers are subject to checks and to this end the producer who disposes of the loose GI spirit drink to a foreign bottler shall inform ADM-Cert.

Mr Detentors of the consignment (batch of certified GI beverage)

The documentation accompanying the batch of 'Grappa' IG must be kept for at least one year and made available to ADM-Cert by the holder of the batch at the time of the check.

The holder of the batch must define the packaging batch and declare under his responsibility the chemical and organoleptic homogeneity of the batch making up that lot.

8 SUSPENSION AND WITHDRAWAL FROM THE CONTROL SYSTEM AND DE-LISTING

Operators wishing to withdraw from or self-inflict from the regulated chain must notify ADM-Cert within 15 days of the decision.

Operators can self-inflict themselves from the supply chain for a maximum period of 18 months.

Operators at the time of self-suspension or renunciation must:

A. communicate the stocks of the product already certified in bulk and/or ~~packaged~~ at their warehouse on the date of renunciation;

B. report that the stocks declared under point A have been exhausted;

C. suspend the use of labels, headed paper and all documents/publications containing references to the 'Grappa' GI once the stocks of the certified product have been exhausted.

In the event of suspension from the system of checks, ADM-Cert will record in the list of operators the status of 'suspended' and during that period any product other than the stocks declared in points A and B. above cannot be claimed as 'Grappa IG'.

In the event of withdrawal from the control system, ADM-Cert may remove it from the list if an approved party is found not to be involved in the production of the GI for a period of at least 24 consecutive months, following the following procedure:

- ADM-Cert sends the company a pre-notification informing it of the possibility of deletion from the list of authorised operators;
- after 30 days without the company objecting to the deletion, ADM-Cert will remove the entity from the List.

9 RE-ADMISSION OF THE OPERATOR TO THE CONTROL SYSTEM

All operators who, following the renunciation/cessation of activity, are excluded from the list of operators checked, decide to be included in the control system, must again undergo the procedure provided for in this technical document, with the exception of cases of notification by the self-suspension operator for a maximum period of 18 months.

In the event of self-suspension, the operator who intends to resume activities in the sector must notify ADM-Cert at least 15 days before the start, in order to carry out any checks on compliance with the requirements declared at the stage of integration into the sector.

After 18 months after the request for self-suspension, in the absence of communication from the operator, the operator is automatically excluded from the control system and removed from the list of operators checked.

10 UPDATE OF THE LIST OF OPERATORS CHECKED

ADM-Cert keeps the list of operators in the register updated according to the requests received (first accessions, renunciations and reconfirmation) and publishes it on its webpage.

11 REGULATED COMPLIANCE REQUIREMENTS

Operators wishing to join the 'Grappa' GI production chain must undergo checks by ADM-Cert and operate in accordance with this technical document and the specification. The attached table 3 provides an illustrative summary of the requirements laid down in the product specification. ADM-Cert will fill in this table for the specific GI, identifying the specific requirements of each category of operator involved in the GI chain, its unique code and the reference to the product specification.

12 ANALYTICAL CHECKS

All the checks (relating to raw materials, semi-finished products capable of becoming 'Grappa' GI, 'Grappa' GI) on the GI consist of:

- the control and analytical activity carried out by the competent customs office on the plant subject to control of GI production;
- the analyses carried out by the operator on its own checks;
- the conformity checks carried out by ADM-Cert in order to ascertain whether the product complies with the rules applicable for GI purposes.

12.1 Own-check analysis

Before designating the GI, the operator must prepare at least 1 sample consisting of 3 aliquots of the product, of 500 ml, to be certified for each batch: an aliquot must be tested at a chemical laboratory, including within the holding, in order to ensure that it complies with the requirements of point 2 (a) and (b) of the specification, and 2 rates must be kept for a period not exceeding 1 year and made available for any counter-analysis by ADM-Cert.

Since some of the parameters laid down in the specification have already been checked by the Customs Agency responsible for the installation as part of the institutional control activities for tax purposes, the outcome of which is summarised in the certificate of analysis of the product under assessment (e.g. 'fully distilled' distillate), and whether the processing carried out by this product does not

during self-checking by operators on the finished product ready for GI designation, the parameters to be checked are at least the following:

- alcoholic strength by volume;
- sugar content (expressed as invert sugar);
- organoleptic characteristics.

After verification of the positive results of the chemical, physical and organoleptic analyses carried out, attesting that the product complies with the product specification for the GI spirit drink, for each batch, the operator may designate the GI and send to ADM-Cert via certified email within 3 days, all documentation relating to self-checking (analytical results issued by the chemical laboratory chosen by the operator, including within the holding, processing sheet), in order to allow any compliance checks by ADM-Cert (Table 2).

A copy of this documentation must be kept, where appropriate in digital form, for at least one year by the operator and made available if requested by ADM-Cert or by the competent authorities.

In the event of non-compliance found, following self-checks (Table 2), the operator physically separates from the other batches approved as eligible and informs ADM-Cert, within 15 days, of the useful operations that he intends to carry out in order to make the batch suitable.

12.2 Analysis by ADM-Cert

ADM-Cert will carry out inspections on operators, at the intervals provided for in Table 2 and from the fourth year on the basis of the RA, to check that the records are correctly kept during own-checks, that the consignments are fully traceable, taking account of the accounting records and taking samples of the finished product, in the number indicated in Table 2, in order to verify all the chemical, physical and organoleptic parameters laid down in the specification. Annual inspections must normally take place at the same time as at least one of the activities provided for in the product specification.

ADM-Cert, having assessed the certificates of analysis made available by the operator and the actual possibility for the consignment to undergo traceability checks, levies the rates for determining the specific characteristics of the GI, as described in paragraph 17.

In order to verify the own checks carried out by the operator, the ADM-Cert inspector may also acquire one of the two rates already taken independently by the operator in accordance with paragraph 12.1 'Auto-check analysis'.

The number of samples taken from the product shall in any case respect the production capacities set out in Table 2.

13 notification CONFORMITY TO ADM-Cert

The ADM-Cert Certification Committee will evaluate and notify the inspection operator of the outcome via certified email, within 15 days of taking the samples:

- in the event of a positive outcome, issuing a certificate of compliance with the product specification;
- in the event of a negative result, it will notify the problems found and the requests for adjustment. In case of non-adaptation, operators will leave the control system and will be removed from the list of operators checked.

The following situations may occur:

Situations	Order
(1) analysis in accordance with the regulated requirements	ADM-Cert notifies compliance with the requirements by notifying the results of analyses showing the type of analysis, the requirements laid down in the specification, the date, the batch, the quantity and the number of the test report issued by the accredited chemical laboratory.
(2) analysis not in accordance with the regulated requirements	ADM-Cert shall notify the operator of the negative outcome of the analyses, indicating the non-compliant requirement and/or requirements and its treatment. Following receipt of the notification of non-compliance, the operator identifies and segregates the batch that cannot be certified pending any request for review of the analysis, or declines it. ADM-Cert may decide on the execution of a sample in the next 5 lots. If only one of the analyses of the following 5 batches gives non-compliant results, the sampling will be further extended to a further 5 successive batches until all reports are compliant. Non-compliant batches should be excluded from the circuit.

The batch of non-compliant finished product cannot be mixed with the 'Grappa' GI, failing which the entire batch will be downgraded.

For the purpose of issuing the suitability judgment on the analytical data given in the test report, ADM-Cert takes into account only the measurement uncertainty which, according to standard UNI CEI EN ISO/IEC 17025, is associated with the data relating to each determination in the same test report. Therefore, the analytical data detected as a result of laboratory analyses will comply with the parameters contained in the specification if it is within the range of the measurement uncertainty or within the range of values given in the test report.

The results of the inspections and analytical checks carried out in the first three years by ADM-Cert in accordance with the procedures laid down in point 5 of this Control Plan and specified in Table 2 will be assessed for the purposes of the risk analysis (attached) on which the checks will be based from the fourth year onwards.

14 LABEL APPROVAL

Before using/using the labels, producers may use the technical assistance provided by the recognised producer group/protection institute/consortium, which may carry out a prior assessment or approval activity.
During the planned inspections (Table 2), ADM-Cert checks that the labelling, designation and presentation schemes for the GI for marketing 'Grappa' GI comply with the product specification.
In these checks, ADM-Cert assesses the conformity of the labels solely with the aspects linked to the certification of this GI (designation of the product, ingredients, additional terms provided for in point 2 (g) of the product specification and the absence of any indication if necessary.

prohibited by it).
ADM-Cert is not responsible for the information declared on the label under Regulation (EU) No 1169/2011 which is not covered by this certification.

15 CONFORMANCE TESTS

When released for consumption, the 'Grappa' GI must meet the characteristics laid down in the specification, while all other parameters must comply with the sectoral legislation in force. The samples tested are taken at the premises/establishments/warehouses of the operator and are intended to verify compliance with the regulated requirements.

16 MANAGEMENT OF LOTS THAT DO NOT COMPLY WITH THE REGULATED REQUIREMENTS

If, as a result of the conformity tests carried out by ADM-Cert and the own-check activity, non-compliance with the regulated requirements has been identified, the batch found to be non-compliant must be identified and excluded from the protected circuit.
If the operator considers that the non-compliance detected can be remedied, it may inform ADM-Cert that it will process the batch downgraded in order to meet the GI requirements; this reprocessed product must be identified by a new batch number and subjected to all the checks provided for in this CP.
Interested parties shall provide evidence to ADM-Cert of the reclassification and final destination of the product by means of an appropriate record.
If the name on the non-compliant product has been used and the product has already been placed on the market, ADM-Cert must ask the operator to recall the product from the market, at the same time notifying the competent authority (ICQRF) and the professional association or organisation applying for the GI.
If, as a result of non-compliance, the batch checked nevertheless has the characteristics of another GI, this is without prejudice to the operator's right to reclassification, following notification to ADM-Cert (e.g. where the origin of the raw material or the minimum alcoholic strength laid down in the specification varies, a Grappa Trentina GI may be reclassified as 'Grappa IG').

17 Arrangements FOR PROVISIONS OF ADM-Cert TECHNICAL PART

The ADM-Cert inspector shall sample ex novo aliquots to be tested from storage containers and/or tanks and/or bottled products. In the case of sampling from storage containers and/or tanks, the operator must first declare the homogeneity thereof.
The final sample consists of 5 aliquots, of which:

- one left to the operator;
- two forwarded to the laboratory: of these, one will be used to carry out the analyses;
- two kept by ADM-Cert as a counter-sample for possible repetition of analyses.

1 In the case of a product to be analysed contained in a single tank, only one sample corresponding to one test shall be taken;
2 in the case of a batch contained in several separate and non-communicating tanks, ADM will be responsible for:

CERT shall sample in one of the following ways:

a) a number of samples equal to the square root of the number of tanks containing the product shall be taken, rounded to the nearest integer, and in any case at least two samples shall be taken. If the results differ, one sample must be taken and examined from each tank in the batch;

b) the coacherve of the sample results from the sampling of portions of the product from each tank proportional to the contents of the tanks. In this case, if the sample is found to be irregular, the entire lot must be considered as non-compliant.

18 REVIEW OF ANALYSES

If the analyses are found to be non-compliant, ADM-Cert must promptly notify the negative outcome of the analyses and at the same time inform the operator of the possibility of conducting the review procedure, with a deadline of 15 (fifteen) from receipt of the notification for submitting the application.
Failure to submit a request for revision is tantamount to waiving the review of the analyses and, as a result, as it is a serious non-compliance on the product, the batch is excluded from the 'Grappa' GI circuit and the operator must downgrade the batch in question in the registers within 15 days provided for in the legislation and adapt the information on the relevant tanks. ADM-Cert may carry out an inspection within 15 days of the inspection in order to verify that the update has been carried out.
The audit analyses are carried out at another chemical laboratory, accredited by ACCREDIA in the spirit drinks sector, using procedures in accordance with standard UNI CEI EN ISO/IEC 17025. The negative outcome of the audit analyses is final.
The above laboratory must inform ADM-Cert and the operator of the date on which the review will be carried out, at which a company representative or technical adviser may attend.
If the second test is satisfactory, ADM-Cert will communicate the outcome to the operator. The costs of the audit analyses shall be borne by the unsuccessful party.

19 INSPECTIONS, ANALYTICAL TESTS AND DESK REVIEWS

For inspection purposes, the operator shall allow ADM-Cert:

- access to all relevant areas, records and staff involved.
- participation in the various inspections by ADM-Cert observers and the accreditation body's evaluators, subject to appropriate acceptance by the operator, who will assess only the work of the control body.

The operator must also countersign, graphically or electronically, inspection and sampling reports, a copy or summary of which he receives.

ADM-Cert applies the NCs set out in Table 4 and informs the operator of the date on which the inspection will take place or by which the operator must provide the information requested and which may not exceed 10 working days. If the NC is confirmed, ADM-Cert suspends the operator until the compliance conditions are restored and notifies the MASAF.
The entity entered into the control system, which is acting in a manner designed to prevent inspections or to obstruct or obstruct the verification of the documents necessary for the control activity, is found to be in breach of its obligations. ADM-Cert communicates to the operator

failure to comply with the exclusion from the control system, removing it from the list of operators checked and notifying the MASAF of this measure.

20 Registration OF THE CONTROL ACTIVITY BY ADM-Cert

The control work carried out by ADM-Cert's inspection staff is recorded in specific control reports prepared for the various activities carried out and categories of operators included in the control system.

The basic elements of each inspection report are:

- date and time of commencement and end of the inspection check;
- identification of the type of inspection (ordinary/extraordinary) that the inspector is preparing to conduct;
- identification of the ADM-Cert inspector and the employee/delegate of the registered operator accompanying the inspector during the verification;
- list of verified requirements;
- space for recording findings and observations;
- signature and stamp of the holding/entity at which the check was carried out.

In order to take samples, a report drawn up for this purpose must be drawn up.

The basic elements of each sampling report are:

- date and place of collection
- identification of the person from whom the sample was taken (holder of the analysis);
- type of product taken;
- number of portions making up the sample;
- identification of the sample (s);
- quantity of product for each individual rate;
- the date of production and/or expiry date of the sampled product and/or the production batch to which it belongs;
- indication of the checks requested from the laboratory.

21 NON-COMPLIANCE

Failure to comply with a specific requirement required by the product specification or failure to comply with this control plan established by ADM-Cert gives rise to non-compliance. Non-conformities (NC) are classified as serious (G) and minor (L) and are associated with requirements that are not met among those listed in Table 4 by means of the specific requirement ID.
Following the CN, measures are taken by ADM-Cert against the operator according to the seriousness of the findings. The treatment of the non-compliance and the corresponding corrective actions shall always be communicated to the operator with a measure that may include:
Reinforced control measure (MCR): or a specific additional control activity consisting of at least one additional inspection visit (for CN classified as serious);

Exclusion of the product from the GI circuit: an order preventing the operator from claiming for a product batch or for the raw material, the GI until the compliance conditions are restored;
Request and/or update of documentation: measure by which ADM-Cert officially requires the recognised entity to send a specific document or update a relevant register in order to maintain the recognition requirements.
Failure by the operator to update the documentation may give rise to an additional inspection.
Table 4 sets out examples for each operator in the chain of classification of possible NCs and the corresponding treatments provided for in the control plan.

21.1 NC detected by ADM-Cert in the course of the control activity

In compliance with the provisions in force, non-compliant situations classified as serious will be notified to the ICQRF for follow-up.
The notification to the competent authorities (Inspectorate) of serious non-compliances detected by ADM-Cert in the course of the checks takes place only following a final decision rejecting the appeal, if submitted by the operator, or on expiry of the time limit for lodging an appeal (see paragraph 23) and a request for review of the analysis (see section 18).

22 timing OF NOT CONFORMITY BY ADM-Cert

The time taken to manage the NCs (from initial recognition until notification to the interested party) must be such as to minimise the risk of non-compliant products being placed on the market and in any case no later than 10 days after initial recognition (except in the case referred to in point 23).

23 COMPLAINTS, APPEALS AND LITIGATION

The aim of ADM-Cert's policies and procedures is to ensure the constructive and timely resolution of disputes and must be made clear and unambiguous to the operators included in the control system. In the event that such procedures did not lead to a resolution of the dispute, or if the proposed procedure was not accepted by the opponent or by other parties involved, ADM-Cert provides for the possibility of appealing to the decisions taken.

Complaints

All complaints must be received in writing to ADM-Cert and are handled in accordance with the procedure available on the ADM-Cert website. The outcome of the investigations and the reasons for the related decisions shall be issued by ADM-Cert within 30 days of receipt of the complaint, informing the operator concerned accordingly.

Appeals

The operator will be able to have recourse to ADM-Cert against the measures and decisions taken by ADM-Cert as a result of the control activities.

The appeal may be lodged within 30 days of the date of notification of the decision taken by ADM-Cert. The appeal must be signed by the operator concerned (legal representative of the company) and must contain a clear indication of the contested decision and of the reasons on which the request is based, as well as an indication of any documentation that is intended to be produced.
The ADM-Cert Appeals Management Committee examines the appeal, listens to the operator's representatives if requested, and decides within 30 days of receipt of the appeal. The deliberations will be formalised to the applicant by registered letter or certified email. The costs of the appeal shall be borne in full by the unsuccessful party.
Decisions of the adjudicating body on appeals are binding on ADM-Cert and on the applicant and may only be challenged before the judicial authority.

Litigation

Any dispute relating to the application of this document will be settled before the court responsible for ADM-Cert's registered office.

24 CONSENT AND RIGHT OF OBJECTION

Inspections are carried out by employees and/or self-employed professionals reported by ADM- Cert to the ICQRF; testing may be delegated to accredited chemical laboratories chosen by ADM-Cert; operators may object to technical inspectors by sending a reasoned written communication to ADM-Cert which, if the reasons are accepted, will replace the inspector.

25 failure to comply with PECUNIARIO NEI CONFRONTI Di ADM-Cert

Failure to comply with the financial obligations gives rise to a request for payment by ADM-Cert. ADM-Cert shall send a statement of account and a letter indicating the payment to be paid and the terms of payment and the time limits within which proof of payment has been made, no later than 30 days after the deadline set in the schedule of fees. If the operator fails to clear what is due, ADM-Cert shall suspend the operator from the GI circuit within 30 days of notification until the conditions are restored.
ADM-Cert shall inform the ICQRF of the suspension measures taken.

26 CONFIDENTIALITY

ADM-Cert shall ensure maximum professional confidentiality with regard to information and data acquired in the course of its business. All members (members of the Councils, inspectors, managers, employees), as well as all staff who may in any way have access to the records of ADM-Cert, shall be bound by confidentiality and undertake in writing not to disclose information to outside third parties. All ADM-Cert archives (IT and paper) are adequately protected and with exclusive access to the Authorised Persons.
ADM-Cert requires the operator's written consent to transfer information to third parties, except for the mandatory information to be sent to the Competent Authorities and the Accreditation Body. ADM-Cert, notify operators of the privacy statement under the legislation in force.

27 PUBLISHED AND TRANSPARENCY

All documents of the certification scheme intended for the operator shall be published on ADM-Cert's website.

Table 3 Example summary of the requirements laid down in the product specification

Operators	Regulated requirements	Req code.	Ref. Specification and/or CP
Raw material producers/conference holders	Winemaking products and by-products: grape marc and lees from grapes produced and vinified in Italy and/or from grapes with characteristics to be included in the additional terms	I	Specification of Annex Points 1 and 2 (e) (g)
Distilleries/Processing plants/Ageing Warehouses	Location in the production area provided for in the product specification	II	Specification of Annex Paragraphs 1. and 2. c)
Distilleries/Processing plants/Packaging mills/Ageing stores	Acquisition of raw material, semi-finished product or finished product from the registered supplier to the GI control circuit.	III	PDC pto 7.1, 7.2
Distilleries/Processing plants/Ageing Warehouses	Method of manufacture (production processes), processing, processing, ageing.	IV	Specification of Annex Point 2 (d)
Processing plants Packaging mills Magazzino di maturazione	Suitability of the installations and notification of any changes compared to the initial application	V	PDC p.ti 3, 7.1, 7.2
Distilleries/Processing plants/Packaging mills/Ageing stores	Identification and traceability of consignments of the product likely to become GI; Spatial/temporal separation between raw materials, semi-finished products and finished products capable of becoming GIs with equivalent products not capable of becoming GIs; separation of non-compliant batches which may be used for further processing in order to bring them into conformity with the specification	VI	PDC p.ti 7.1 and 7.2, 12.1, 16
Distilleries/Processing plants Packaging plants	Characteristics on consumption: chemical, physical and organoleptic.	VII	Specification of Annex Point 2 (a), (b)

Distilleries/Processing plants Packaging plants	Description, presentation and labelling.	VIII	Specification of Annex Point 2 (g)

Table 4 Classification of non-compliances and related treatments

Process Step (Operator)	ID Requirement category	Requirement category NOT fulfilled	Req code. (Table 3)	CN (*) L = mild G =	Treatment of the CN
Raw material producer/producer (Winemaking products and by-products)	1	Conformity of production area of raw material	I	G	Exclusion of the product from the GI circuit and notification to the operator
Manufacture and ageing	2	Acquisition of raw materials, semi-processed, finished GI, from an operator registered in the GI control system	III	G	Exclusion of the product from the GI circuit and notification to the operator
	3	Compliance with the location of the establishment in the production area provided for in the product specification	II	G	Exclusion of the product from the GI circuit and notification to the operator
	4	Compliance of the production process with the specification	IV	G	Exclusion of the product from the GI circuit and notification to the operator
	5	Chemical, physical and organoleptic characteristics of the product	VII	G	
	6	Identification and separation of raw materials and semi-finished products capable of becoming GIs with equivalent products not capable of becoming GIs	VI	G	

Process Step (Operator)	ID Requirement category	Requirement category NOT fulfilled	Req code. (Table 3)	CN (*) L = mild G =	Treatment of the CN
Packaging/bottling	7	Acquisition from an operator registered in the GI control circuit	III	G	Exclusion of the product from the GI circuit and notification to the operator
	8	Identification and separation of GI products with non-GI products	VI	G	
	9	Chemical, physical and organoleptic characteristics of the product	VII	G	
Visita/ Sampling (by ADM-Cert)	10	Compliance with the requirements of the specification	IV, VII	G	Exclusion of the product from the GI circuit and notification to the operator
Self-checking	11	Compliance with the specification requirements regarding production/processing /processing/ageing/packaging processes	IV	G	Exclusion of the product from the GI circuit and notification to the operator
	12	Compliance with the requirements of the specification as regards the chemical, physical and organoleptic characteristics on consumption (tests carried out)	VII	G	Exclusion of the product from the GI circuit and notification to the operator

Process Step (Operator)	ID Requirement category	Requirement category NOT fulfilled	Req code. (Table 3)	CN (*) L = mild G =	Treatment of the CN
Self-checking	13	Physical separation of non-compliant batches from other lots recognised as suitable and communication to ADM-Cert, within 15 days, of the useful operations that the operator intends to implement in order to make the lot fit for purpose	VI	G	Exclusion of the product from the GI circuit and notification to the operator
Labeling Conformity of the elements of designation and presentation in relation to the GI	14	Pre-market compliant labels	VIII	L	Request for adaptation with submission or addition of documentation
	15	Use of compliant labels/materials and description and presentation if not marketed	VIII	L	product block with the possibility of replacing any non-compliant labels; label correction; Adjustment check

Process Step (Operator)	ID Requirement category	Requirement category NOT fulfilled	Req code. (Table 3)	CN (*) L = mild G =	Treatment of the CN
Labeling Conformity of the elements of designation and presentation in relation to the GI	16	Use of compliant labels/materials and description and presentation placed on the market	VIII	G	Exclusion of non-compliant batches and where possible repackaging obligation. Notification to the operator of exclusion of non-compliant consignments and where possible repackaging obligation
For all stages of the production process	17	Notification of changes made after recognition; Notification of the results of checks carried out by other competent administrative or judicial authorities that may affect the GI	V	L	Request additional documentation
				G (* *)	
	18	Completeness of documentation and/or formal errors in accounting records	VI	L	Request for adaptation with submission or addition of documentation

Process Step (Operator)	ID Requirement category	Requirement category NOT fulfilled	Req code. (Table 3)	CN (*) L = mild G =	Treatment of the CN
	19	Correspondence of the accounting load relating to the quantities of the GI drawn up. Supplementing the documentation referred to in the previous point	VI	G	Exclusion of the product from the GI circuit and notification to the operator
	20	Identification of GI batches in processing	VI	L	Request for adaptation with submission or addition of documentation
	21	Separation of the GI from other products not allowed or not covered by the product specification.	VI	G	Notification to the operator of the exclusion of the product intended for the GI
	22	Supplementing the documentation referred to in the previous point	VI	G	Notification to the operator of the exclusion of the product intended for the GI

Legend:
(*) CN: Non-conformity.
(* *) if the amendments do not comply with the product specification. In this case, the product shall be excluded from the GI circuit.

ADM-Cert ® WMD CERTIFICATION BODY	Plan for checks on 'Grappa' GI spirit drink	PDC 1- Grappa Rev. 0 of 20/02/2023

ANNEX I. RISK ANALYSIS

The risk assessment applied to the GI system for spirit drinks must be based on objective data, depending on the critical points in the chain where it is considered that non-compliance may be easier and require greater attention to be paid to a given product.
The following risk classes are then defined (Table 5):
NEGLIGIBLE: the operator does not raise any concerns about the system; however, provision is made for

a percentage of operators in this category extracted randomly at 10 % from the inspection body which will be subject to a pre-announced visit.
MEDIUM: over time, the operator has shown some problems (probably related to understanding how the quality system is managed) but which nevertheless tend to make it reliable.
MODERATE: the operator has shown criticisms to take countermeasures in a reasonably short time with more frequent visits.
HIGH: the operator has shown problems that give rise to serious concerns for the entire system, which can only continue to operate if it is continuously and accurately monitored; corrective and preventive actions to reduce the risk must be implemented and verified in a very short time.

The minimum inspections (Table 6) to be carried out will result from the arithmetic mean, i.e. the sum of the values obtained for each individual applicable risk factor divided by the number of applicable risk factors (5). Risk Factors are listed in Table 7.
If the result of the operation is not an integer, it shall be rounded up to the nearest integer if the decimal place is greater than 5 and to the lower integer if the decimal place is less than or equal to 5. Only one high risk factor (i.e. 3) involves carrying out an inspection visit to the operator.

Table 5 Risk classes

RISK CLASS	VALUE
NEGLIGIBLE	0
AVERAGE	1
MODERATED	2
ELEVATED	3

Table 6 Minimum number of inspection visits determined by risk class

RISK CLASS	NO OF VISITS	PERCENTAGE OF OPERATORS TO BE CHECKED
NEGLIGIBLE	1	10 % randomly extracted with pre-announced visit
AVERAGE	1	35 %
MODERATED	2	100 % of which one unannounced
ELEVATED	3	100 % of which two unannounced

The analytical methodology followed, as it is also based on qualitative assessments, results in an implicit degree of inherent subjectivity that needs to be periodically reconsidered: indeed, the effectiveness of the actions taken must be carefully checked by means of monitoring which may also lead to a risk reassessment in the event of changes in the input data considered.
Numerical values for macro categories of operators are determined in the tables below.
The number of control inspections resulting from the production is to be understood as the minimum level to be ensured by each inspection body.
At the packager extracted for the inspection, sampling of the bottled product must be carried out to check that the contents comply with the specification.
The costs of inspections carried out by ADM-Cert in excess of one, charged to entities in the MEDIO and HEVATO risk class, will be charged to the same operators. The amount to be paid will be that of the additional checks.

Table 7 Risk factors

		PRODUTTORI-CONFERITORS RAW MATERIALS/DISTILLERY/PACKER/AGEING WAREHOUSE			
RISK CLASS		NEGLIGIBLE	AVERAGE	MODERATED	ELEVATED
RISK FACTORS		Risk values			
1	CN mild in the previous three years (only if repeated for the same case) [3]	0	1	2	3
2	Severe CN in the previous three years	0	1	2	3
3	Results from checks by the competent authorities:				
	NOpenalty	0			
	Reduced payment or administrative penalty up to EUR 10.000 edited		1		
	Reduced payment of administrative penalty in excess of EUR 10.000			2	
	Criminal sanction and/or seizure by MA				3

[3]repeated CN for the same case means CN for the same requirement ID (Table 4). In the case of three or more repeated minor NCs, the associated risk value is 3.

		PRODUTTORI-CONFERITORS RAW MATERIALS/DISTILLERY/PACKER/AGEING WAREHOUSE			
RISK CLASS		NEGLIGIBLE	AVERAGE	MODERATED	ELEVATED
RISK FACTORS		Risk values			
4	Date of last inspection:				
	1 year	0			
	2 years		1		
	3 years			2	
	4 years				3
5	Company size (production/processing/packaging);				
	≤ 300 lt hydrates	0			
	Over 300 to 20.000 lt hydrates		1		
	Over 20.000 to 400.000 lt hydrates			2	
	of 400.000 lt hydrates				3