

# **Strategic Plan of the GSPP Foundation 2019-2023**

GSPP Secretariat

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Strategic Plan of the GSPP Foundation 2019-2023

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## Summary

The Strategic Plan of the GSPP Foundation 2019-2023 comprises three major strategic directions for the further development of the GSPP standard and related activities of the foundation. The plan is based on the experience gained in relation to the GSPP standard since its inception 10 years ago, the views of stakeholders, and a review of international developments relevant to GSPP and those that have the potential to facilitate compliance of GSPP participants with new international plant-health regulations.

The focus of the GSPP standard remains the prevention of *Cmm* in tomatoes. The standard has been improved where relevant and necessary. The feasibility of the development of a hygiene code for plant raisers under the umbrella of the foundation and its implications is reviewed. The hygiene code is based on the principles of GSPP, but will have a broader scope than *Cmm* and tomatoes only. The foundation will closely follow the 'systems approach' initiative of the international seed industry and consider the implications it might have for GSPP.

## Introduction

Good Seed and Plant Practices (GSPP) is a hygiene and management system that focuses on *Clavibacter michiganensis* spp. *michiganensis* (*Cmm*) in tomato and rootstock for greenhouse crops. GSPP strictly follows state-of-the-art quality standards and hygiene protocols and relies up on independent audits.

The goal of the GSPP system is to prevent, to the extent possible, the occurrence of *Cmm* in all steps of the tomato propagation chain.

The success of the GSPP system is the joint responsibility of all partners in the business chain, from seed companies, seed producers, young-plant raisers and seed technology companies to growers.

The GSPP system is a private scheme. This scheme and its associated trademark are owned by the GSPP Foundation. The foundation was established in 2009 by Dutch and French stakeholder organizations representing seed producers and plant growers from both countries.

This Strategic plan of the GSPP Foundation 2019-2023 is based on the discussions held with the GSPP Board over the past year. (Inter)national developments and challenges have been taken into account in order to further strengthen the position of the GSPP Foundation in the area of plant health in the years to come.

The GSPP Board adopted the strategic plan of the GSPP Foundation 2019-2023 in its meeting held on 24 April, 2019 and has taken into account the comments received from stakeholders.

## The strategic development plan 2014-2018

The current GSPP strategic plan (2014-2018) is set to expire. The plan was based on the outcome of a strategic meeting held in March, 2014 and included a SWOT analysis. The main conclusions of this analysis were summarized as follows:

- All parties are positive about what has been realized and have the intention to continue to position the GSPP trademark as a label for *Cmm* for both plant raisers and seed companies;
- Cooperation between the GSPP Foundation and its network is valuable within the chain;
- The involvement of plant raisers should be enhanced both as accredited companies and as participants in the International Technical Committee (ITC) of the GSPP Foundation;
- In future, all parties should operate more as a chain:
  - by communicating about the added value of the GSPP system;
  - when involved in a Technical Investigation Procedure (TIP);
  - by promoting the use of GSPP-labeled plants.
- The GSPP Foundation should take the differences between participants more into account:
  - Companies are not identical: small companies have fewer staff members, and insufficient and/or different levels of available capacity.
  - Different requirements apply to different companies (there is already a difference between plant raising for seed production and plant raising for fruit production). This should be developed in future in relation to types of companies.
- There is commitment on the part of all involved parties to support the implementation of the strategy of the GSPP Foundation in the years to come.

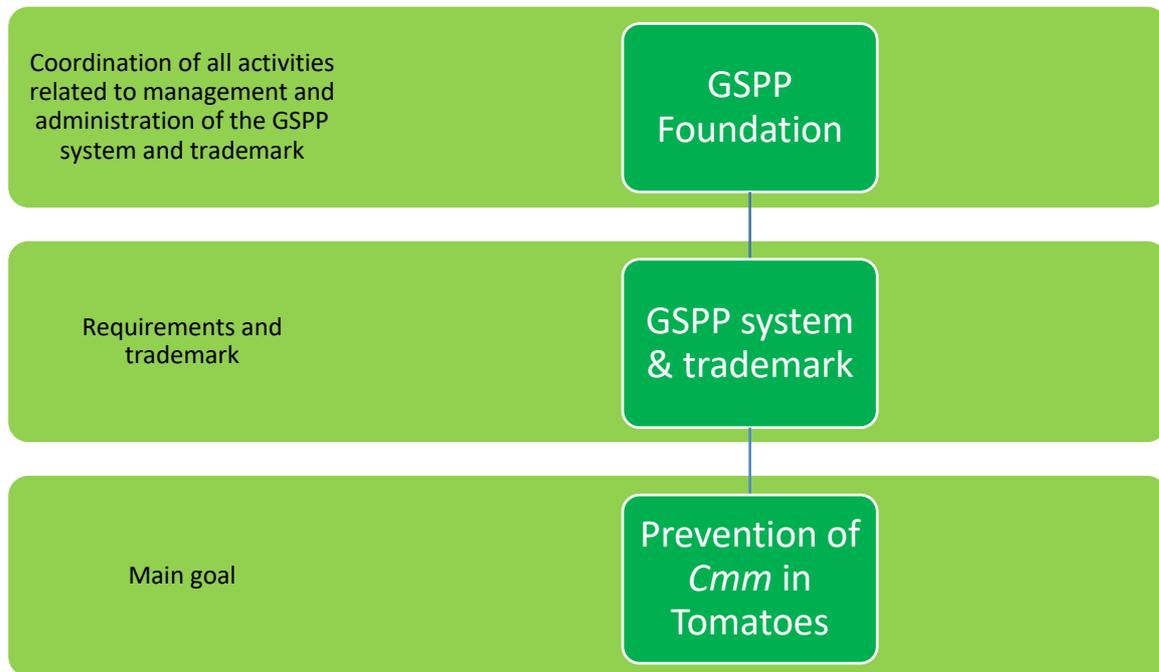
Based on the conclusions of the SWOT, the GSPP Board agreed to focus on climate-controlled glasshouses and on *Cmm* in tomato and tomato rootstocks.

Current mission statement and model of the GSPP Foundation

In 2014, the mission of the GSPP Foundation for the next five years was defined as follows.

Good Seed and Plant Practices (GSPP) is an international, transparent business chain system. The purpose of GSPP is to prevent tomato seed and plant lots from being infected with *Clavibacter michiganensis* spp. *michiganensis* (*Cmm*).

The current model of the GSPP organization is as follows:



**Figure 1. The model of the GSPP organization 2009-2018.**

#### Vision GSPP Foundation 2014-2018

Back in 2014, the GSPP Foundation had a vision of what needed to be achieved between that date and 2018.

- An effective risk-management system will be in place with the aim of preventing *Cmm* from entering the tomato propagation chain that will be recognized by the GSPP trademark and well known among growers (internationally);
- *Cmm* will be seen as an industry-level problem for which the GSPP system is the best solution and as one that requires preventive measures to be taken by all participants, including growers in the tomato chain;
- There will be more GSPP-accredited plant raisers;
- The system must be effective and efficient in terms of costs/risks;
- GSPP will recognize the differences between participants and will do its utmost to address these differences;
- The French and Dutch phytosanitary authorities will recognize the GSPP system as an independent, private plant-health standard;
- The GSPP Foundation is an international, multidisciplinary platform upon which knowledge, expertise and information is shared, gathered, analyzed and used for the further development of the GSPP Standard and the trademark within the tomato production chain.
- The GSPP Foundation is a professional organization based on an effective, efficient and realistic business model in which the primary process from application to accreditation, as well as other processes (i.e. communication, acquisition, independent auditing), proceed in an optimal way. The same should apply to interaction and cooperation between the various entities within the foundation, i.e. the Board, the ITC and the Legal Working Group.

What has been achieved between 2014 and 2018?

*Figures on GSPP certification*

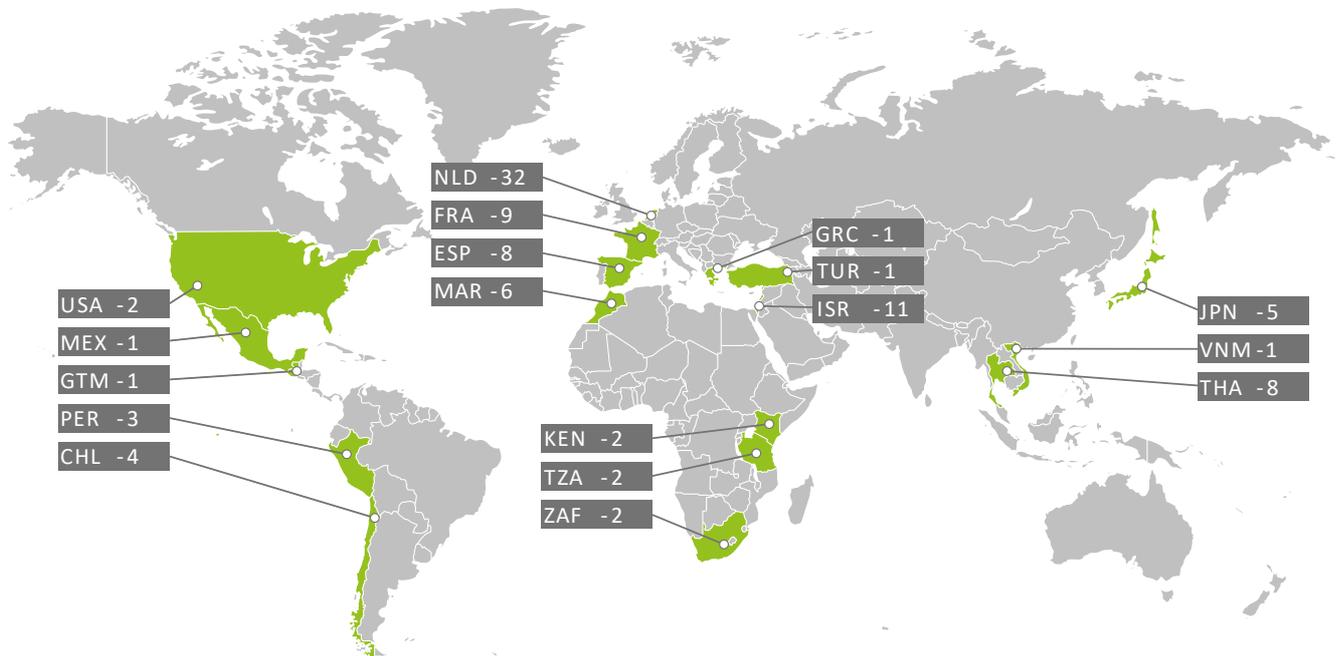
Support for the GSPP system among participants is considerable, despite the stringent requirements of the GSPP Standard. The GSPP Standard is (internationally) recognized as a reliable system for protecting the tomato production chain from *Cmm* infection.

| Type of companies            | Number of companies 2013 | Number of companies 2018 | Number of sites 2013 | Number of sites 2018 |
|------------------------------|--------------------------|--------------------------|----------------------|----------------------|
| Seed companies               | 11                       | 20                       | 45                   | 67                   |
| Seed producers               | 11                       | 10                       | 17                   | 16                   |
| Plant raisers                | 5                        | 8                        | 5 (17.9 ha)          | 12 (48.89 ha)        |
| Other (e.g. seed technology) | 2                        | 3                        | 2                    | 4                    |
| <b>Total</b>                 | <b>29</b>                | <b>41</b>                | <b>69</b>            | <b>99</b>            |

**Table 1. Type and number of GSPP-certified companies in 2013 and 2018.**

As of the end of 2018, 41 companies worldwide, comprising 99 production sites globally in 18 different countries are GSPP certified.

The number of GSPP-certified plant raisers increased over the last five years, particularly in Morocco, South Africa and Greece. The number of GSPP-certified plant raisers did not increase in France and the Netherlands, the target countries identified in the current strategic development plan. In the Netherlands, the area belonging to plant raisers with GSPP certification increased by approximately 41% between 2013 and 2018. For France and the Netherlands, one of the reasons for this is that, from the standpoint of plant raisers, the benefits do not outweigh the costs. They are required to invest, but do not see sufficient returns from the market.



**Figure 2. Worldwide distribution of GSPP-accredited production sites.**

#### *The GSPP Foundation and GSPP Secretariat*

The financial situation of the GSPP Foundation is good. The GSPP Foundation has achieved a reasonable level of financial autonomy due to the annual fees paid by the participants, which are sufficient to cover the daily expenses of GSPP. Over the last couple of years, it has even been possible to pay back outstanding loans from four stakeholders granted to the GSPP Foundation at its inception.

The GSPP Secretariat is well organized, but has a limited capacity and is somewhat vulnerable, as it depends, in large part, on a single person for its daily management.

#### *Auditing Organizations*

Independent auditing of the GSPP system is crucial to the GSPP Foundation. This function is carried out in the Netherlands and France by two independent organizations that also play a role in their respective national plant-health systems. There is good cooperation between the auditing organizations and the GSPP Foundation. However, continued attention for this cooperation is vital to the GSPP Foundation. The two auditing organizations should operate at a comparable level. They are both expected to operate on a cost covering basis.

#### *Cmm notifications and Technical Investigation Procedure*

Two other key processes are the timely reporting of *Cmm* infections and the Technical Investigation Procedure (TIP). According to the standard, GSPP participants have an obligation to notify the GSPP Secretariat of confirmed *Cmm* infections and, where applicable, to inform the secretariat of next steps. GSPP maintains a database of these notifications. This database is a rich source of information that can be used to estimate the reliability of the GSPP system over time. The GSPP Board was of the opinion that a reporting system could serve a wider purpose than registering cases alone. As such, further improvement of the *Cmm* reporting system was included in the strategic plan.

The goals of reporting confirmed cases of *Cmm* infection have been formulated as follows by the GSPP Board in recent years:

- To carefully analyze information in the reports in order to react, in the short term, when there are linkages that cannot be seen by individual companies. Only the companies involved are informed that a TIP may be initiated.
- To have the option of alerting a GSPP participant (that is involved in a *Cmm* infection) about previous *Cmm* cases in which the same seed company and/or plant raiser and/or tomato grower was/were involved. This is dependent upon GSPP participants effectively reporting *Cmm* infections in which they are involved.
- To be adequately informed so the GSPP Foundation is able to respond if media attention makes an incident public. The GSPP Foundation will not comment on individual cases in the media.
- To have an overview of *Cmm* reporting over the longer term.

Closely related to the reporting of confirmed *Cmm* cases, is the Technical Information Procedure (TIP). The TIP is facilitated by the GSPP Secretariat in the event of a confirmed *Cmm* infection. The TIP is part of the GSPP Standard and is mandatory for all GSPP participants involved in a *Cmm* outbreak in material originating from a GSPP product. Affected non-GSPP companies have the option to participate in a TIP. The objective of the TIP is to achieve technical conclusions in situations in which a *Cmm* incident has occurred.

In early 2016, the GSPP Board noted that both processes were in need of improvement and decided to initiate the Working Group Reporting and TIP with the following terms of reference:

- defining requirements and means of reporting in the event of reports of *Cmm* from customers relating to distributed GSPP material or material from GSPP production sites;
- improving the TIP procedure based on the evaluation of the first TIP and making the TIP more transparent and accessible from the standpoint of non-GSPP participants and growers;
- defining a format for a root-cause analysis and the TIP-report.

In recent years, the Working Group Reporting & TIP has sought to improve several products, as formulated in the terms of reference, that may facilitate finding root causes in cases of *Cmm* infection. The Working Group realized the following products:

- a new version of *Cmm* infection handling, Root Cause Analysis (RCA) and Technical Investigation Procedure (TIP) in the GSPP supply chain;
- a flowchart that describes when and how notification of a confirmed *Cmm* infection in GSPP-origin material must be made to the GSPP Secretariat and/or the supplier of the GSPP product;
- an additional set of definitions;
- a primary version of the technical format for the RCA and TIP.

In autumn 2018, the Working Group completed its activities. A review of the new procedure by the Legal Working Group and the ITC was carried out recently. The ITC determined what the implications are for the GSPP Standard. Specifically, the issue of crisis management has been addressed.

The new procedure may also have added value as a marketing instrument for GSPP certification. It has the potential to encourage companies to become GSPP accredited, as the timeframe in which to request a RCA or TIP is longer for GSPP participants than it is for non-GSPP participants.

The new procedure better defines what *is* part of the GSPP supply chain and what is *not* under the control of this chain. It describes what GSPP participants are required to undertake in the event of a confirmed *Cmm* incident in which material originates from a GSPP product (seeds and/or young plants that are marketed and/or distributed under the GSPP label or has been part of the GSPP system at any point).

Also, the role of an RCA is more clearly laid out in the new procedure. An RCA must be executed in order to learn from confirmed incidents, which in turn may lead to improvement of the system.

In the event of a confirmed *Cmm* infection, parties involved are required to initiate a TIP without delay. However, a few recent TIP cases have shown that parties sometimes need a substantial amount of time to reach agreement, most often to settle legal issues. Involvement of a non-GSPP participant proved to be an additional hurdle.

A TIP is primarily a technical process with the aim of drawing clear conclusions about the cause of the infection and, where applicable, amending the GSPP Standard and its annexes accordingly. However, the stakes of the parties involved are high and, therefore, require the necessary legal safeguards.

This raises the question of whether or not GSPP should revisit the TIP or otherwise address the legal concerns of GSPP participants.

## Towards a new strategic plan – trends and challenges

The core business of GSPP is the prevention of *Cmm* entering the tomato-production chain. Since the GSPP Foundation was founded, a robust system has been developed, but there is room and a need for further improvement of all key elements of GSPP. In the next five years, due attention will be paid to these issues with aim of keeping the GSPP system up to date, reliable and relevant.

The GSPP Foundation is an industry initiative in which involved parties take responsibility for tackling a serious plant-health problem. The GSPP Standard is based on a risk analysis. It comprises a solid system for tracking and tracing and serves as a platform for the exchange of information and expertise between parties in the tomato-production chain. Independent auditing ensures that certified companies comply with all the requirements of the GSPP Standard. From the wider perspective of plant health, the GSPP system is a showcase that is relevant not only to the tomato-production chain, but also to other areas of seed and plant production.

Interesting international plant-health-related developments are taking place that are relevant to the GSPP Foundation. The GSPP Board has regularly reviewed these developments and, upon its request, stakeholders have expressed their preliminary views on these developments and discussed potential implications for the GSPP system.

### National and international developments relevant to the GSPP Foundation

The plant sector is facing a situation in which fewer and fewer chemical crop-protection products are available on the market. This trend is set to continue and the situation may even become worse. This

has prompted companies to look for alternative ways to protect their crops and prevention will certainly be an important option going forward.

In the European Union, the new EU Plant-Health Regulation (2016/2031) will be applicable to all plant-health related matters in the coming decades. A role has been defined for the so-called 'authorized operator'. This operator is allowed to issue plant passports for intracommunity trade provided he or she fulfills certain requirements such as training of staff and having a pest-risk management plan in place, as well as being able to ensure the traceability of plants.

In response to the new EU Regulation, France has put forward a 'Plant Risk Management Plan' (PGRP). Operators can apply for official approval of their risk management plans. In addition to this, in the Netherlands, *Naktuinbouw* is developing quality-plus systems that enable growers to demonstrate the added value or superior quality of their crops. *Naktuinbouw* has developed and is developing several modules under the Verification Program for seed production and market access, like *Naktuinbouw* Authorized Laboratories (NAL), *Naktuinbouw* Authorized Field Inspections (NAFI) and *Naktuinbouw* Authorized Varietal Identity & Purity (NAVIP).

The International Seed Federation (ISF) has established a Working Group Systems Approach with the aim of developing a single, globally-accepted systems approach that will serve as an alternative to existing pest-risk management options to secure phytosanitary certification for international movement of seed.

In the USA, the National Seeds Health Accreditation Pilot Program (NSHAPP) has evolved into a new program called Regulatory Framework for Seed Health (Refresh) and pilots are under way.

In the Netherlands, four seed companies are working on the development of a program called Disease Prevention Program (DPP).

The Asia and Pacific Plant Protection Commission is developing a Regional Standard for Phytosanitary Measures (RSPM) on phytosanitary procedures for chili-seed health certification.

The Australian Government Department of Agriculture and Water Resources organized two workshops in 2018 in which developments regarding the ISF systems approach, NSHAPP/Refresh and the Disease Prevention Program were discussed.

#### *The new ISO standards*

The establishment of a systematic approach to dealing with risk is one of the key changes in the 2015 revision of ISO 9001. There are risks in all systems, processes and functions. Risk-based thinking ensures that these risks are identified, considered and integrated throughout the quality management system. Among other changes in the ISO 9001:2015, specific, documented procedures are no longer required. It is the responsibility of the organization to maintain documented information to support the operation of processes and retain documented information to the extent necessary to be confident that the processes are being carried out as planned. The extent of the documentation that is needed depends on the business context and the risk-based approach (NEN, 2017). As GSPP relies on ISO and NEN standards, GSPP should carefully consider developments in international standardization and follow up when appropriate.

## The views of the stakeholders

The current focus of GSPP is the prevention of *Cmm* in the tomato-production chain. GSPP is a specific trademark with a limited scope that provides starting material for high-value and high-tech tomato producers. Risk management and prevention of *Cmm* is the shared responsibility of all actors in the tomato-production chain. Implementation of the GSPP Standard on the part of these actors in the seed and plant production chain has a positive effect on the companies' focus on hygiene, the continuous improvement of hygiene measures and control of production processes.

The GSPP Standard can be seen as a system that operates as described in the International Standard for Phytosanitary Measures No. 14 '*The use of integrated measures in a systems approach for pest-risk management*' (FAO/IPPC, 2017), which reduces the phytosanitary risk of *Cmm* infection by applying various measures in the chain of production.

Risk analysis has become increasingly important in the realm of plant health. Plants and seeds are traded around the globe and the risks of introducing and spreading pests and diseases inherent in this process are apparent. Industry faces stringent requirements imposed by national plant-health authorities when importing or exporting seeds and plants.

The underlying principles and practices of GSPP – pest-risk management, tracking and tracing, and extensive global cooperation and exchange of information and expertise between companies– are widely applicable, beyond their current scope, to other diseases or crops. The GSPP Board, therefore, reviews ongoing (inter)national developments, particularly in the area of international trade of seeds with the aim of contributing to these developments on the basis of the experience gained in the nearly 10 years that have elapsed since GSPP was founded.

GSPP has been specifically designed for the tomato-production chain, focusing on one specific pathogen (*Cmm*). The general requirements are laid down in the standard, and the crop and pathogen-specific requirements are described in several annexes.

The requirements are stringent and compliance with the GSPP Standard requires substantial investment on the part of GSPP participants.

This leads to the question of whether or not a company can benefit from this investment outside the narrow scope of preventing *Cmm* infections in tomatoes, once GSPP certified. Do GSPP certified companies have an advantage related to the framework of ISF-Systems Approach? Do GSPP-accredited companies fulfill the requirements that national governments develop in the context of the new EU Plant Health Regulation?

GSPP is based on risk analysis, quality management, hygiene protocols, and tracking and tracing, which are also important principles in the new EU Plant Health Regulation, for instance, as well as in various ISPMs of the FAO. Likewise, these principles are recognized in the PGRP in France and in similar schemes in The Netherlands. This provides opportunities to look at GSPP from a broader plant-health perspective. Preferably, this can be done without amending the GSPP Standard or with only minor amendments to avoid a further increase in the requirements. Broader applicability of GSPP might encourage companies to become GSPP certified.

Broadening the scope of GSPP to other crops and pathogens has been discussed by the stakeholders, but did not receive much support. Seed producers foresee an unrealistic increase in seed testing

requirements. Plant raisers are more interested in the wider use of GSPP as a hygiene protocol, rather than in broadening its scope. This needs to be explored further, as do the implications for both the GSPP Foundation and the GSPP Standard.

### The Boards' decision on the strategic plan 2019-2023

The GSPP Secretariat drafted a first paper for the GSPP Board meeting in June 2018 to facilitate discussion on this subject. The several discussions that have taken place over the past year within the GSPP Board, taking into account the views of stakeholders, has led to the conclusion that the three directions described below will be explored and elaborated further as a basis for the next Strategic Plan of the GSPP Foundation 2019-2023 and the foundation's vision. Regarding the GSPP standard, it was agreed that the focus should remain on tomatoes and *Cmm*. Given the general principles of GSPP —risk analysis, risk management, and tracking and tracing— it was felt that the GSPP Certificate could have added value in light of recent international developments such as the publication of the EU Plant Health Regulation 2016/2031 and that this should be explored further.

|           |   |
|-----------|---|
| <b>A.</b> | <b>The consolidation and further improvement of the GSPP system and GSPP trademark.</b>   |
| <b>B.</b> | <b>To explore the broader use of the GSPP infrastructure for a hygiene protocol for plant raisers. This protocol should be applicable beyond just tomatoes; it should be applicable to a wider range of vegetable crops in order to produce healthy plant material.</b>   |
| <b>C.</b> | <b>To anticipate current developments in the seed industry related to a so-called system approach to facilitating the international trade of seeds in light of the steadily increasing phytosanitary requirements of national authorities. Once such a system has been developed and accepted internationally, the GSPP system should be ready to be seen as a private scheme that complies with the requirements of a system approach. It would provide added value to its members, both those in the seed industry and plant raisers. Anticipating the development of an internationally recognized system approach, the GSPP Foundation will closely follow these developments, analyze its compatibility with such a system approach and adjust the GSPP Standard where applicable. Simultaneously, the GSPP Foundation will explore whether or not it can offer possibilities to host private schemes developed by other parties to comply with the system approach and have a broader scope than tomatoes only.</b> |

### Mission statement and model of the GSPP Foundation for 2019-2023

For 2019-2023, the mission of the GSPP Foundation is defined as follows:

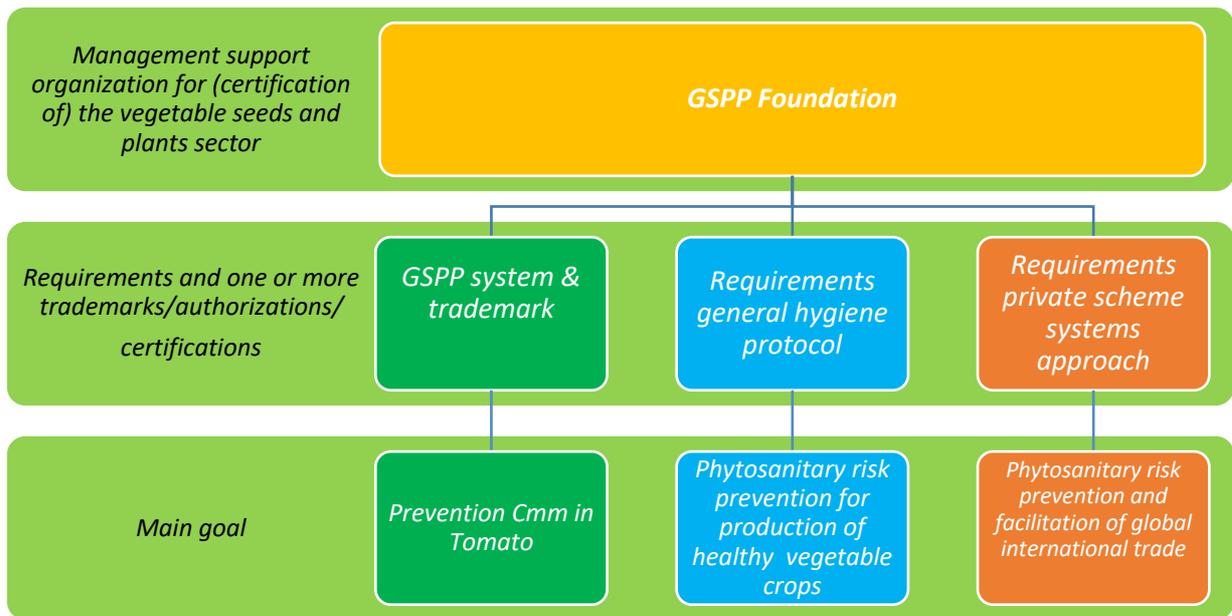
Good Seed and Plant Practices (GSPP) is an international, transparent business-chain system. The purpose of the GSPP Foundation is to promote the supply of healthy seed and young plants of vegetable crops.<sup>1</sup> It provides added value to its members in terms of compliance with national and international plant-health requirements.

<sup>1</sup> The Statutes of the GSPP Foundation (Statuten Stichting GSPP), 8<sup>th</sup> December 2009.

*The future model of the GSPP organization 2019-2023*

The GSPP Foundation has proven its capability and added value in development, implementation, facilitation, maintenance and management of an international private system, the GSPP Standard. Worldwide, a network of companies has voluntarily taken responsibility for applying for the GSPP Standard. The GSPP system is independently audited by two audit organizations in the Netherlands and France that also have national responsibility in plant-health regulation. Based on this success, experience and knowledge, the GSPP Foundation can expand its international ambitions. The GSPP Foundation can serve as a host for other systems developed by the foundation itself or created by third parties.

The GSPP organization can further develop as a management-support organization in which the different systems, resulting from the three strategic directions, can be developed and built or hosted and managed.



**Figure 4. The model of the GSPP organization 2019-2023.**

*Core values GSPP Foundation*

Core values of the GSPP Foundation for 2019-2023 are as follows:

- international cooperation
- prevention & mitigating of risk
- global continuous development of the sector
- independent auditing
- trade facilitation
- science-based

## Vision GSPP Foundation for 2019-2023

For the years 2019 to 2023, the GSPP Foundation seeks to strengthen its position as an international center of expertise and cooperation in the field of preventing the spread of diseases and promoting the production of healthy seeds and young plants. In this context, three directions for the strategy will be further developed:

### A. GSPP, consolidation and further improvement of the GSPP system and GSPP trademark.

**Goal:**

Prevent tomato seed and plant lots from being infected by *Clavibacter michiganensis subsp. michiganensis (Cmm)*.

The GSPP Foundation further develops, improves, maintains and manages the international GSPP standard and trademark. The GSPP Foundation continues to host the GSPP system and trademark and delivers management support. The benefit for the tomato supply chain is plant-health risk management in the prevention of *Cmm*.

### B. GSPP, the broader use of GSPP infrastructure for a hygiene protocol for plant raisers, applicable beyond just tomatoes.

**Goal:**

Phytosanitary risk prevention and management for the production of healthy vegetable crops.

The GSPP Foundation will develop, implement, facilitate, maintain and manage an international hygiene protocol for plant raisers. The hygiene protocol has added value for plant raisers in terms of producing and internationally trading healthy vegetable crops. The benefit for the sector is plant-health risk management for a broad range of crops and diseases. The GSPP Foundation will serve as a hosting organization for this hygiene protocol.

### C. GSPP, a potential role in facilitating the international trade of seeds.

**Goal:**

Phytosanitary risk management and facilitation of global international trade of vegetable seeds.

The GSPP Foundation realizes compatibility of the GSPP system with the future framework of the systems approach and the annex of the ISPM. Alternatively, and simultaneously, the GSPP Foundation may consider developing new private systems in order to comply with (inter)national phytosanitary requirements. The GSPP Foundation will serve as the host organization for a system that is already (being) developed and focuses on a basic disease prevention system for a broad range of vegetable crops and diseases. The GSPP Foundation will offer management support for such systems in addition to the GSPP Standard.

As indicated previously, the current GSPP Secretariat has a limited capacity and is somewhat vulnerable. When giving their support for the Strategic Plan 2019-2023, as described, the stakeholders of the GSPP Foundation should be aware of the financial and staffing implications the strategic plan might have for the foundation. These implications will be further elucidated and, at a later stage, stakeholders should be ready to invest in the GSPP Foundation in order to have the means (finances, additional capacity, expertise, office, etc.) available to realize the ambitious goals set out in this strategic plan.

## Reports cited or used

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