



Sustainability Framework Programme Verification Report for Browns Plantations -Maturata Plantation PLC- Up country

Land Use Verification Add-on to RA Farm
Certification

*Sustainability Framework v1.3
System Requirements for Certificate Holders v1.3
Chain of Custody and Traceability Standard v1.3 - applicable
requirements for Land Use*

SFP Auditor: Oshada Kumarasiri and Sophia Joseph
Vellilamthodukayil

Audit dates : 23 Nov 2022 – 24 Nov 2022

Report date : 29 August 2023

Audit type: Assessment

Organisation Contact

Maturata Plantation PLC, Browns
Plantations, Level 12, Browns
Capital Building, No 19, Dudley
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Contact person: Tharindu
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Preferred by Nature Contact

Preferred by Nature OÜ
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Contact person: Christian Sloth,
Sustainability Framework
Programme Manager



Report scope

Preferred by Nature recognises the Rainforest Alliance Certification as an equivalent scheme, thereby the SFP add-on verification audit solely focuses on evaluating the Sustainability Framework indicators that are not addressed by the equivalent scheme standards.

The scope of this SFP Add-on Verification report aligns with Browns Plantations -Maturata Plantation PLC- Up country's Select external scheme certificate ID NC-M-102302 encompassing the same scope.

Audit conclusions

Verification decision

Based on the auditor's recommendation and Preferred by Nature quality review, the following verification decision is taken:	
Preferred by Nature verification decision:	Verification approved
Verification decision by (name of the person):	Annabelle S. Calicdan
Date of decision:	05 September 2023

NOTE REGARDING SALES CLAIMS: The organisation has not sold any products yet as Sustainability Framework verified. However the requirements related to the claims have changed since the assessment. For any material that conforms with the requirements of the Sustainability Framework and which the organisation wants to sell as verified, the following claims must be used on sales and transport documentation: "Preferred by Nature verified – Sustainability Scope.". The claim shall be accompanied with the Sustainability Framework certificate code, which will be issued to the organisation.

Closed Non-Conformity Reports (NCRs)

NCR number: 01/03	NC grading:	Major <input checked="" type="checkbox"/>	Minor <input type="checkbox"/>
Standard & requirement:	SFP Land Use Verification Checklist – Sustainability Framework V1.3 2.6.4: Payment is made directly to all workers to ensure they safely receive and retain their wages.		
Description of non-conformance:			
Payment records of permanent and causal workers were checked, payment discrepancies were observed for casual workers as they were paid only 900 LKR instead of 1000 LKR. As per the Sri Lanka Wage Board Ordinance, 1000LKR/day is the legal minimum wage to be given to all workers. Additionally, workers did not receive gratuity and maternity payments based on legal revised rates. And overtime rates were also not paid based on legal minimum.			
Corrective action request:	Completed during RA CVA		
NCR conformance deadline:	Completed		

Client evidence:	minimum wages for casual workers, overtime wage, maternity benefit, gratuity benefit were provided during RA CVA
Evaluation of evidence:	Completed by the RA CVA auditor
NCR status:	The payment discrepancies (on minimum wages for casual workers, overtime payment, maternity benefit and gratuity benefits) were corrected by the organisation and proof submitted during RA CVA. Hence, NCR closed.
Comments (optional):	

NCR number: 02/03	NC grading:	Major <input checked="" type="checkbox"/>	Minor <input type="checkbox"/>
Standard & requirement:	SFP Land Use Verification Checklist – Sustainability Framework V1.3 3.6.4 - Release of pollutants to the air is prevented or reduced, and meets all legal levels for emissions.		
Description of non-conformance:			
All the 3 processing facilities within the Organisation scope are legally obliged to obtain and renew the Environmental Protection License (EPL) from the government. Initial verification indicated that EPL of Ragalle and Highforest estate were not renewed. However, it was corrected during the RA CVA and the validity of the licenses were cross verified during the CVA.			
Corrective action request:	Completed during RA CVA		
NCR conformance deadline:	Completed during RA CVA		
Client evidence:	Environmental Protection License was provided during RA CVA		
Evaluation of evidence:	Completed by the RA CVA auditor		
NCR status:	Environmental Protection License (EPL) Renewed by Organistaion and proof submitted during RA CVA. Hence, NCR Closed		
Comments (optional):			

NCR number: 03/03	NC grading:	Major <input checked="" type="checkbox"/>	Minor <input type="checkbox"/>
Standard & requirement:	SFP Land Use Verification Checklist – Sustainability Framework V1.3 3.6.5: Pollution from noise and light is minimised or avoided		
Description of non-conformance:			
As per the Factory Ordinance Act of Sri Lanka, Machineries used for tea processing namely Boilers, Hoisters and compressors are to be inspected by government authorized staff annually. Initial verification indicated that hoisters and compressors in Ragalle and Highforest estate were due for inspection, however, government authorized inspection records were produced by the organization and NC closed during RA CVA.			

Corrective action request:	Completed during RA CVA
NCR conformance deadline:	Completed
Client evidence:	Inspection report were provided during RA CVA
Evaluation of evidence:	Completed by the RA CVA auditor
NCR status:	Hoister and Compressor inspection carried out by government authorized personnel and license approved. The proof had been submitted during RA CVA. Hence, NCR Closed.
Comments (optional):	

Observations

Note: Observations are issued for the early stages of a problem, which does not of itself constitute a non-conformance but which the auditor considers may lead to a future non-conformance if not addressed by the Organisation; observations may lead to direct non-conformances if not addressed.

OBS number: 01/01	Standard & requirement:	Carbon compensation
Description of findings leading to Observation:	The Organisation has not yet completed its carbon footprint exercise and done carbon compensation for the products. This is a pre-requirement for use of the seal in relation to final products.	
Observation:	The Organisation may not use the seal before the carbon footprint exercise and related compensation is completed. This means that currently the scope of the certificate does not cover use of the Seal. If the Organisation wishes to use the Seal, the following must be completed prior to Seal use. The carbon footprint related to the products must be completed and be verified by Preferred by Nature and the related compensation must be completed. This observation has been raised, to have this important aspect clearly formalised in the report.	

ANNEX 1. SFP Land Use Verification Checklist – Sustainability Framework V1.3

The following checklist shall be used to verify conformance against Sustainability Framework V1.3. Note that EUDR-related indicators are identified.

Principle 1: Management and business practices are responsible.

Criterion 1.2 Management planning and operations are conducted responsibly. Management planning and operations are in accordance with legal requirements.			
#	Indicator	Findings	Compliance
1.2.3 EUDR	Legal harvesting or production requirements are complied with.	Document review indicated that the Organisation follows Sri Lanka Tea Board recommendations for green leaf production, harvesting and pruning operations. Review of the pruning plan and harvest intervals in each of the 3 estates indicated that the organization carried out the recommendations described in the Tea Board Ordinance. Budgeted tea production for the current year and the actual productions of the previous year were also checked to identify any discrepancies.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
1.2.4 EUDR	Legal requirements related to disclosure of information are complied with.	The Organisation maintains stock registries for timely entry of green leaf production, processing and dispatch of final product to auction facilities. They have obtained license from Sri Lanka Tea board to carry out production and trade of tea and it was verified during the evaluation process.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Criterion 1.3 Taxes and fees are paid. Applicable taxes and fees have been paid in a timely manner and according to legal requirements.			
#	Indicator	Findings	Compliance
1.3.1 EUDR	Legal requirements for payment of royalties, land/area taxes and fees are complied with.	The Organisation complies with applicable laws of the country and has obtained license from Sri Lanka Tea Board, Central Environment Authority and Local government body under their regulatory frameworks. Payment receipts of land taxes and government fees have been cross checked during the verification.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
1.3.2 EUDR	Legal requirements for payment of value-added taxes and/or other sales taxes are complied with.	Organisation has complied with applicable taxation liabilities of Sri Lanka and had no pending payments for the year 2022, which was verified during the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
1.3.3 EUDR	Legal requirements for payment of corporate taxes are complied with, including profit taxes.	Being a private limited company, the Organisation has complied with payment of corporate taxes. The payment receipt and Corporate license were verified during the evaluation process.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
1.3.4 EUDR	Legal requirements for payment of trade and/or export taxes and fees are complied with.	The Organisation does not involve with export activities. They have obtained license from Tea Board and complied with legal regulations of Sri Lanka Ministry of Plantations for carrying out production and processing of tea and have paid fees to Tea board to trade finished tea to buyers in the auction facility.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Criterion 1.4 Corruption, fraud and conflict of interest are avoided. Corruption, fraud and conflict of interests are avoided, while business integrity is ensured according to best practices.			
#	Indicator	Findings	Compliance
1.4.1 EUDR	Legal requirements relating to corruption - including bribery - fraud and conflict of interest are complied with.	National legal regulations and rules on corruption, bribery and conflict of interest have been complied with by the Organisation. They have standardized and documented policies and operating procedures to prevent corruption, bribery and conflict of interest. The SOP and company policies were reviewed to evaluate the compliance.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
1.4.3	Conflicts of interest are identified, declared and managed.	It was indicated by the management staff that the organisation follows strict guiding principles and procedures for avoidance of corruption, conflict of interest and bribery within the Organisation. Anti-corruption and bribery policies, conflict of interest management measures were described in the organisation SOP and management policies, which were verified during the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Criterion 1.5 Trade and procurement are responsible. Trade and transport of materials, products and animals are conducted according to legal requirements and respecting principles of fairness and transparency in contractual obligations.			
#	Indicator	Findings	Compliance
1.5.1 EUDR	Legal requirements relating to trade and transport of products are complied with.	The Organisation has obtained license from the Tea board and local government body for trade and transport of their final produce from plantation estates to warehouse and the auction facilities.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
1.5.2 EUDR	Legal requirements related to applicable trade restrictions and sanctions are complied with.	It was verified that the Organisation complies with applicable trade regulations of the country with related to tea and plantation sector.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
1.5.4 EUDR	Legal requirements relating to export and/or import are complied with.	The Organisation does not involve in export or import activities. It was cross checked with their procurement of raw material and dispatch of final produce stock registries and payment records.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
1.5.5 EUDR	Legal requirements relating to offshore trading and transfer pricing are complied with.	The Organisation does not involve in offshore trading or transfer pricing. Hence, not applicable.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
1.5.6 EUDR	Legal requirements relating to due diligence or due care are complied with.	Legal regulations and requirements on due diligence have been complied by the Organisation through their various policies and management plan.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Criterion 1.6 Buildings, infrastructure and activities are developed and maintained in a responsible manner.

#	Indicator	Findings	Compliance
1.6.1	Development of buildings, infrastructure and activities are complying with applicable codes and legal requirements.	The organisation complies with legal laws and building regulations of Sri Lanka namely National Building Research Organisation (NBRO) for construction, and other activities inside the plantation area, as it is mandated by the government to obtain approval before construction and other activities from the local government authority.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
1.6.3	Maintenance of buildings and infrastructure ensures their integrity and function, while minimizing impacts on surrounding environment and people.	The Organisation renovates and maintains their building facilities within the plantation area by ensuring minimal impact on environment and people. Environmental Protection License from Central Environment Authority and compliance with regulations of National Building Research Organisation (NBRO) and local government authorities have been ensured and their documented evidence (licenses and building approvals) were cross checked during evaluation process.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
1.6.4	Where applicable, buildings, infrastructure and activities ensure appropriate access and accessibility features.	Onsite visit to processing facility, muster sheds, chemical storage areas, creches and other building components inside the estates indicated that sufficient access and accessibility is established in each of these building.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Criterion 1.7 Quality of customers and visitors experience is continuously improved.

#	Indicator	Findings	Compliance
1.7.3	Communication to customers and visitors is accurate and reliable and promotes responsible visits and interactions.	It was observed by the auditor that customer visit records are diligently maintained by the organisation. The organisation representatives hold meetings on a regular basis (based on their yearly planner) to improve the quality of service they are providing to the customers and visitors; the meeting minutes were documented by the organisation and it was cross-checked during the evaluation process. Maturata Plantations PLC is one of the largest regional plantation companies in Sri Lanka and has been involved in tea growing, processing and packaging on a commercial scale since 1870, the extent of their activities are displayed on a timely basis in their website brownsgruop.com and LinkedIn account.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Principle 2: People's well-being and human rights are respected.

Criterion 2.6 Workers are remunerated in a responsible manner. All workers, permanent as well as contractors, seasonal and migrant workers, are remunerated meeting or exceeding legal requirements and with respect towards workers' right to a decent standard of living.			
#	Indicator	Findings	Compliance
2.6.4	Payment is made directly to all workers to ensure they safely receive and retain their wages.	Document evaluation of payment records indicated that the workers received their salary on a monthly basis and were given pay slips (in local language) which described their overtime hours, bonus, deductions etc. Interview with workers indicated that they were aware of contents of their pay slip and received their payment on a monthly basis. Payment records of permanent and casual workers were checked, initially payment discrepancies were observed for casual workers as they were paid only 900 LKR instead of 1000 LKR. As per the Sri Lanka Wage Board Ordinance, 1000LKR/day is the legal minimum wage to be given to all workers. Additionally, some workers did not receive gratuity, maternity payments based on legal rates. And overtime rates were also not paid based on legal minimum. However, the discrepancies related to minimum wage for casual workers, overtime wages, maternity benefit, gratuity benefit were corrected by the organisation and proof submitted during RA CVA.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Principle 3: Nature and the environment are protected.

Criterion 3.1 Forests and other ecosystems are not converted. Activities do not contribute to deforestation or conversion of forests or other natural ecosystems.			
#	Indicator	Findings	Compliance
3.1.2 EUDR	Primary Forest is not degraded or converted to Plantation Forest, Other Planted Forest or Other Wooded Land after 31st December 2020.	There are no primary forests within the plantation boundary, and it was cross-checked with the protected area map of Sri Lanka.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.1.3 EUDR	Naturally Regenerating Forest is not degraded or converted to Plantation Forest or Other Wooded Land after 31st December 2020.	The organisation does not have notified protected area in their plantation boundary. However, they have demarcated conservation areas (30.66 hectare) and natural ecosystems within their plantation and have taken steps to protect them. As per the Hectarage statement and onsite verification by the audit team, it was identified that no land	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

		conversion has taken place after January 2014.	
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Criterion 3.5 Waste is reduced and managed responsibly. The volume and negative impacts of waste from activities, including production and processing, are managed and minimised and meet legal requirements.			
#	Indicator	Findings	Compliance
3.5.6	In case of cross-border transportation of hazardous waste, the requirements of Basel Convention are complied with.	The organisation has tea processing facilities within the plantation area, however, no hazardous chemicals are used during the tea processing operations. Hence, no hazardous waste produced.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

Criterion 3.6 Pollution is minimized or prevented. Pollution as a result of production, processing or other activities are controlled and minimized and meet legal requirements.			
#	Indicator	Findings	Compliance
3.6.2	The use of Ozone Depleting Substances (ODS) is conducted according to legal requirements and minimised as far as possible.	<p>The organisation has 3 tea processing facilities within the plantation area; however, no ozone depleting substances are used during the tea processing operations.</p> <p>Fire extinguishers kept in the processing facilities were Water fire extinguishers (stored pressure type) and did not have ozone depleting substances in it. The Organisation has Environmental Protection License (EPL) issued by the government for all three-processing facility under its production area. The hoisters, boilers and compressors were also inspected by the government authorized personnels and license renewed for them.</p> <p>During the initial verification, 2 of the 3 estates (Ragalle and Highforest estate) did not have their EPL renewed. And their boilers and compressor annual inspection was also pending. However, during RA CVA, the Organisation has corrected its NCRs and submitted proof of license and inspection records carried out by government authorized personnels.</p>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.6.4	Release of pollutants to the air is prevented or reduced and meets all legal levels for emissions.	All the 3 processing facilities have obtained Environmental Protection License (EPL) from the government and the validity of the licenses were cross verified during the audit. The organisation's processing facilities use	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

		<p>boilers powered by fuelwood. The boilers in the processing facilities were licensed and approved by the government, annual license renewal was also carried out and it was cross checked during the verification. The final tea waste residues from the processing facility were collected and disposed off in an appropriate manner, some of which was used for compost generation.</p> <p>Initial verification indicated that EPL of Ragalle and Highforest estate were not renewed. However, it was corrected during the RA CVA.</p>	
3.6.5	Pollution from noise and light is minimised or avoided.	<p>As per the Factory Ordinance Act of Sri Lanka, Boilers, Hoisters and compressors were inspected by government authorized staff annually and the license were cross checked during the initial verification and the CVA. The machineries used in the processing operations were inspected annually and the records were evaluated during the verification and RA CVA.</p> <p>Initial verification indicated that hoisters and compressors in Ragalle and Highforest estate were due for renewal, however, it was verified during RA CVA and inspection records were produced by the organization and NC closed.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>N/A <input type="checkbox"/></p>

Principle 4: Climate impacts are reduced and mitigated.

Criterion 4.2 Climate change adaptation efforts are implemented proportionate to the risks. Risks resulting from climate change that may endanger the sustainability of operations are considered and appropriate climate adaptation measures are implemented.			
#	Indicator	Findings	Compliance
4.2.2	Measures for climate change adaptation are implemented for areas of high risk and proportionate to the scale of the operations and anticipated social, economic, and environmental impacts.	<p>The Organisation has carried out important measures in high-risk areas of their plantations, which were verified using document review and onsite visit:</p> <ul style="list-style-type: none"> - Soil erosion control and rehabilitation through planting of Mana grass (<i>Cymbopogon confertiflorus</i>) in the months of Nov 2022, Dec 2022 and Jan 2023. - Wind erosion control through shelterbelts and wind breaks (overgrown belt of tea plants). - Biodiversity conservation through creation and protection of conservation areas and natural ecosystems. 	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>N/A <input type="checkbox"/></p>

		Additionally, the organisation has conducted a study using multispectral drone for quantitative evaluation of fertilizer requirement for the plantations in the year 2022.	
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ANNEX 2. System requirements checklist

This checklist is based on the standard "SF-02 System Requirements for Certificate Holders".

1. Scope			
#	Indicator	Findings	Compliance
1.1	The Organisation shall define and document the scope of the activities, products and entities included in the scope of the verification.	The organisation covers 3 estates and their processing facilities under its scope (Highforest estate, Ragalle estate and Liddesdale estate), their total area accounting to 1907.75 hectare. The Organisation has developed a management plan which is revised every year (last revision in Nov 2022) to accommodate the changes, scope and activities carried out in all the 3 estate plantations coming under the organisation. Additionally, the organisation has documented evidence on the process and production flow happening in all the 3 estates. The documents were cross verified during the evaluation process.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
1.2	Any scope change shall be documented and communicated to Preferred by Nature as relevant.	The scope of verification was defined and communicated to Preferred by Nature by the organisation representative (Sustainability Manager).	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
1.3	If the scope covers multiple entities/properties, the Organisation ensures compliance of those entities/properties with all applicable requirements.	The organisation has ensured that all the 3 estates coming under its scope comply with the applicable requirements of the Standard. Their management plan and relevant company policy documents provided standardized procedures that are to be followed by all the 3 estates for the compliance of applicable requirements. The same was verified during the document evaluation process and interview with the sustainability manager of the organisation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

2. Responsibilities and competence

#	Indicator	Findings	Compliance
2.1	A position with overall responsibility for conformance with all applicable requirements is defined.	The organisation has appointed Mr. Darshana Deshapriya for the overall responsibility for compliance to the requirements of the Standard. Apart from him, there were staff designated in each estate whose works were overseen by Mr. Darshana. The organisation member chart was produced to the auditor for verification. Interview with Mr. Darshana indicated that he is knowledgeable on the Standard requirements.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.2	The responsible person (and other designated staff) have sufficient authority and resources to ensure that requirements are met.	The responsible staff conduct meetings (online as well as offline) in regular intervals to discuss the proceedings of their different sustainability schemes and their progress. Meeting minutes were documented, and it was verified during the evaluation. Interview with the responsible staff (Mr. Darshana and the estate staff) indicated that the staff are provided with sufficient authority and resources to ensure that Standard requirements are complied with.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.3	Individual responsibilities for relevant requirements are defined and known.	The staff roles and responsibilities are defined in their management plan and it was checked during the verification. Since they have other certification schemes namely RA, ISO, HACCP, the requirements were defined and met along with other certification scheme requirements as well.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.4	Staff and workers, including contractors and seasonal workers, demonstrate awareness of and competence in all aspects of fulfilling the requirements relevant to their position and role.	Interview with staff indicated that they were aware of their roles and responsibilities and were able to explain the same.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

3. Systems, procedures and records

#	Indicator	Findings	Compliance
3.1	Systems are established and implemented to achieve and maintain conformance with all applicable requirements. The systems shall be adequate and proportionate to the size and complexity of operations.	The management plan and SOP of the organisation were reviewed to check the compliance with the requirements of the standard. The organisation has appointed staff to oversee and help the estates comply with the Standard requirement needs. The organisation deals with certification schemes namely RA, ISO, HACCP, GMP. The requirement needs are partially met through the compliance of all these certification schemes as well.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

3.2	Procedures covering the specified scope and all applicable requirements including identifying and addressing non-conformances shall be established, implemented and updated.	Organisation has assigned staff to carryout regular stepwise measures to identify and improvise the compliance requirement of all their certification schemes. They have established a common standardized procedure to cover the scope and requirements of all necessary indicators of the Standard.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.3	Relevant information, records, documents, workers, locations or entities (including members, suppliers and subcontractors) are available for Preferred by Nature auditors to evaluate conformance.	The Organisation has provided the auditor with access to required documents, records, access to processing facilities, estate locations, interview workers and staff, and provided sufficient explanation during the review and onsite evaluation process.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.4	The Organisation has all relevant evidence, including records and documentation, stored and kept for at least 5 years.	Organisation representative indicated that they would maintain the relevant records for a period of 5 years, similar to RA requirements. Document evaluation indicated that organsiation documents such as payment records, stock records, management plan, SOP, processing site requisite licenses etc. are maintained for longer than 5 years by the organistaion, similar to RA requirements.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

4. Internal performance evaluation

#	Indicator	Findings	Compliance
4.1	Internal performance is evaluated for all entities included in the scope at least annually against the Sustainability Framework Programme requirements and: a) Evaluation is documented, where appropriate to the size; b) Gaps or weaknesses are addressed and corrected in a timely manner.	Internal evaluation for RA requirements are carried out by the Organisation and additionally, the Sustainability Framework standard requirements were also internally evaluated similar to RA requirements by the Organisation. The evaluation report was checked during the verification.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

ANNEX 3.

CoC and traceability requirements (land-use only)

This checklist is based on the SFP standard System Requirements for Certificate Holders v1.4.; Annex 1: CoC requirements for land-use entities.

Annex 1: CoC requirements for land-use entities.

Criterion 1.3 Sales and managing outputs			
#	Indicator	Findings	Compliance
4.1.1	The organisation shall ensure that material sold as verified originates from areas that are included in the scope of their verification certificate for Sustainability Framework Programme verification.	<p>This is add-on to Rainforest Alliance certification and the scope in terms of areas covered and products for both schemes is same. The findings regarding separation and tracking thus rely mostly on the same system as is in place for Rainforest Alliance.</p> <p>Document review of stock records (production registry of green leaf, sifted and processed tea), dispatch and invoice book indicated that traceability was maintained in all 3 estates. The difference between the estimated and actual production of green tea (both RA and non-RA) was not greater than 10% for the plantations. Hence, the traceability was maintained by the Organisation.</p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.1.2	If the organisation handles material that are not from areas covered by the scope of their verification certificate, they shall segregate verified material from non-verified material	The organization handles RA and non-RA tea production from within their estates and also from nearby estates, however the tea produced are visually segregated and accounted in stock registry in separate columns indicated RA and Non-RA teas and each estate contribution is also explicitly mentioned in the stock registry. The final produce has the estate name indicated in the package, depicting the origin of the tea and the estate they come from. This was checked during processing facility visit and stock record verification.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.1.3	The Organisation shall ensure and be able to document that volumes or weight of material sold as verified do not exceed actual production included in the verification scope.	Stock registry documents (green leaf, processed and made tea production records) were reviewed to check the traceability of the produce from green leaf to final tea and their dispatch to warehouses and auction facilities. The	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

		volumes were recorded in the traceability platform of RA and review indicated that no double selling/ over selling is carried out by the organization.	
4.1.4	All output material sold with a claim shall be clearly identifiable and claims shall conform to the requirements of "The Claims and Seal Use Standard".	The organisation has not sold any products yet as Sustainability Framework verified. However, the requirements related to the claims have changed since the assessment. For any material that conforms with the requirements of the Sustainability Framework and which the organisation wants to sell as verified, the following claims must be used on sales and transport documentation: "Preferred by Nature verified – Sustainability Scope.". The claim shall be accompanied with the Sustainability Framework certificate code, which will be issued to the organisation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.1.5	Records of all sales of claimed products shall be recorded by the Organisation, including, but not limited to the following: <ul style="list-style-type: none"> • Reference of sale and/or shipping document, • Date of shipping, • Description of the product, • Type of raw material and, if applicable, species, • Quantities • Product claim. 	Organisation maintains production and sales record of tea (both RA and non-RA separately) starting from green leaf production – withered sifted tea – final made tea. The final made tea is packed and stored in warehouse or sent to auction facilities. The records on production, sales, invoice and dispatch records were verified during the evaluation process by the auditor.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	Organisations seeking to align with the EU Deforestation Regulation shall instead refer to the following requirement. For the sale of compliant material, the Organisation shall compile, record, and communicate information on: <ul style="list-style-type: none"> • The origin of the material back to the plot of land or establishment where the raw material was harvested (or grown); • The date or time range of production of the product. NOTE: This requirement is mandatory only for companies that want to claim alignment with the EU Deforestation Regulation.	Tea is not in the scope of the EU Deforestation Regulation and thus this requirement was not evaluated at the time of assessment.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>