



# Rainforest Alliance Rules for Planning and Conducting Chain of Custody Audits

September, 2018  
Version 1

The Rainforest Alliance works to conserve biodiversity and ensure sustainable livelihoods by transforming land-use practices, business practices, and consumer behavior.

### More information?

For more information about the Rainforest Alliance, visit [www.rainforest-alliance.org](http://www.rainforest-alliance.org) or contact [info@ra.org](mailto:info@ra.org)

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## Policy

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<b>Developed by:</b>		<b>Approved by:</b>	
Chain of Custody Manager		Senior Manager, Standards	
<b>Linked to (name of documents):</b>		<b>Reference criterion or clause number:</b>	
Chain of Custody Policy, Standard and Terms and Definitions		-	
<b>This policy is applicable to:</b>		<b>Type of organizations (if applicable):</b>	
Certification Bodies		Chain of Custody Participating Operators	
<b>Crops:</b>		<b>Regions:</b>	
N/A		All regions.	

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## INTRODUCTION

The Rainforest Alliance is a growing network of people who are inspired and committed to working together to achieve its mission of conserving biodiversity and ensuring sustainable livelihoods. Through creative, pragmatic collaboration, Rainforest Alliance aims to rebalance the planet by building strong forests and healthy communities around the world. For more information about the Rainforest Alliance, visit our website: <http://www.rainforest-alliance.org>.

To expand the reach of the Rainforest Alliance sustainable agriculture certification program and to safeguard the system's integrity, quality, competitiveness, and credibility, the Rainforest Alliance works with independent certification bodies around the world. Authorized certification bodies certify farms, farmer groups and operators against the Rainforest Alliance Sustainable Agriculture and Chain of Custody standards.

The Rainforest Alliance is committed to ISEAL's Code of Ethics and supports the ten ISEAL Credibility Principles, which capture what is essential for a sustainability standards system to deliver positive impact. The Rainforest Alliance also applies the principles of ISEAL's codes of good practice: the Code of Good Practice for Setting Social and Environmental Standards (Standard-Setting Code); the Code of Good Practice for Assessing the Impacts of Social and Environmental Standards (Impacts Code); and the Code of Good Practice for Assuring Compliance with Social and Environmental Standards (the Assurance Code).

## ASSURANCE SYSTEM

The Rainforest Alliance manages and is responsible for a global Assurance System for Certification Bodies (CBs). As Rainforest Alliance certification expands further globally, the goal is to foster a highly credible and rigorous system. The audit and certification services rendered under the Assurance System maintain and ensure the general sense of purpose as well as a commitment to high quality, integrity, and transparency which is also reflected in the commitment to continual improvement of systems, documentation and processes.

The assurance system is comprised of a compendium of documents that describe the rules of the system and describe the requirements for CBs to be authorized. These documents include, but are not limited to:

- Rules for the Authorization of Certification Bodies;
- Rules for Auditor Competence;
- Rules for Planning and Conducting Audits;
- Rules for Planning and Conducting Chain of Custody Audits;
- Certification Database Guidance;
- Spatial Data Requirements and Guidance.

This document establishes the rules for CBs for conducting audits based on the 2015 Chain of Custody Standard for Participating Operators.

CBs that have questions about the content or the interpretation of these Rules should contact Rainforest Alliance for any clarification (sas@ra.org).

## TERMS AND ABBREVIATIONS

To simplify references and minimize redundancy, the system documents employ the following terminology and abbreviations; these terms will not be italicized in the document:

Term and Abbreviation	Description
Assurance System:	Refers to all the regulations, requirements and processes described in the compendium of Rainforest Alliance Assurance documents.
Certification Body (CB):	Entity authorized by Rainforest Alliance to conduct audits and certification for the Rainforest Alliance sustainable agriculture certification program.
Certification Database	A Rainforest Alliance platform for the monitoring of the certification program which is used by Certification Bodies to store and report detailed information on certification data for farms, groups and chain of custody operations. In addition, Auditor competence monitoring through auditor registration and confirmation of days in the field (via audit records) to ensure auditors are competent for evaluating certified operations.
Certificate holder:	Refers to a farm or producer group that is Rainforest Alliance Certified™.
Chain of Custody (CoC):	All the steps involved in the supply chain that are taken from primary production on a certified farm to final consumption, including processing, transformation, manufacturing, and storing, where progress of the product to the corresponding stage in the supply chain involves a change of physical and/or legal ownership.
CRA	Chain of Custody Risk Assessment conducted by Rainforest Alliance to determine each company and sites risk level according to activities and other collected information.
Certification processes:	Includes all processes referred to in the assurance system documents.
Inspection Body (IB):	Inspection Body subcontracted by a CB.
Operation:	Refers to a farm or groups regardless of their certified status.
<b>Participating Operator (PO)</b>	Any company, association, factory, processing unit or other entity that applies for Rainforest Alliance Chain of Custody certification.
Rainforest Alliance certification or simply certification:	Depending on the context, when referring to Rainforest Alliance Certification.

## 1. OBJECTIVES

The principal objectives of this document are:

1. Produce consistent and accurate portrayals of PO's compliance with the 2015 CoC Policy and Standard by using established standardized audit procedures and practices.
2. Obtain accurate information about PO's based on clear instructions for information gathering and verification.
3. Ensure the timely and cost-effective implementation of certification processes.

## 2. SCOPE AND IMPLEMENTATION

The processes described in this document shall be carried out by all currently authorized CBs for all CoC audit processes using the 2015 CoC Standard.

CBs and their inspection bodies (IBs) shall meet the requirements and regulations by Rainforest Alliance as well as the ISO 19011 requirements and guidelines, *Guidelines for Auditing Management Systems*, particularly sections 4, 5 and 6.

After the publication date and before the effective date, the CB's responsibilities and rights are to:

- Request clarifications or training from Rainforest Alliance;
- Communicate changes to staff and auditors and ensure proper training;
- Inform operations of relevant changes;
- Adjust internal processes in accordance with these rules;
- Review updates in the Certification Database.

All the audit processes from November 1, 2018 onwards must comply with these rules. These rules do not apply to audits started prior to November 1, 2018.

Rainforest Alliance will start carrying out evaluation and monitoring activities based on the Assurance System as of the effective date.

## 3. PARTICIPANTS IN THE AUDIT PROCESS

The CB shall be comprised by a team of experts for specific areas to complete the certification process and comply with these Rules in accordance with each team member's role. An individual can play the role of different participants. All CB staff involved shall have signed a confidentiality agreement as indicated in the applicable sections within the Rules for the Authorization of Certification Bodies. The CB shall register the contact information of CB staff responsible for the certification process in the Certification database and update it as needed.



### 3.1 Certification manager

This person is responsible for the administration of the certification program. His/her responsibilities are to:

- a) Ensure and supervise that all CB staff meet the qualifications described in this document and other relevant documentation.
- b) Ensure and supervise that auditors conduct the audits in accordance with this document and the Rules for auditor competence.
- c) Update and communicate with CB staff and certificate holders about changes in the certification program.
- d) Provide documentation and/or reports to Rainforest Alliance when requested.
- e) Ensure follow-up communications with Rainforest Alliance are addressed accordingly.
- f) Inform Rainforest Alliance when there are changes that can affect CB compliance with the requirements in this document, as well as cases where the CB receives a sanction from their accreditation body or any other scheme the CB is approved for.

### 3.2 Database administrator

This CB staff member manages the CB account within the Certification Database and ensures proper data input. His/her responsibilities are to:

- a) Input data on certification processes for certificate holders, ensuring each step follows the certification process timeline rules.
- b) Ensure data quality and update certificate holder information as needed. Data quality includes accurate certificate information, as well as consistency of information across the various fields and attachments in the Certification Database.
- c) Update auditor records in the Certification Database with new training, performance evaluations and general auditor details.
- d) Participate in Certification Database training and webinars.
- e) Follow-up on specific data input needs or record updates in timely manner.

### 3.3 Auditor team

Consisting of qualified and registered auditors, one of whom acts as CoC auditor, and any additional technical experts as needed. All must comply with the Rules for Auditor Competence for their respective positions and responsibilities. The teams' responsibilities are to:

- a) Audit according to the system's requirements.
- b) Ensure compliance with the audit report requirements of the certification process timeline (see section 6 – Audit Execution).
- c) Provide accurate information about all aspects of the audit process.

- d) Respond to requests by the database administrator based on requests by the Rainforest Alliance monitoring process.

### 3.4 Quality Reviewer

CB staff that review audit reports to ensure proper interpretation of the 2015 CoC Standard and Policy are responsible to:

- a) Conduct the quality review of the audit reports and ensure that accurate and consistent information is recorded in the Certification Database. For example, the quality reviewer should ensure that list of sites is recorded accurately in the audit report and in the engagement record.
- b) Notify the audit team of any inaccuracies in the non-conformities evaluated in the audit report.
- c) Propose improvements to the Certification Manager in the certification process for the audit quality review and auditor competence.

### 3.5 Certification decision committee

This committee shall be comprised of staff with experience in Rainforest Alliance certification processes, and at least one person involved in the decision process shall be a qualified CoC auditor. The committee can consist of one person as long as that person is not a part of the audit itself. The certification committee responsibilities are to:

- a) Make the final certification decision.
- b) Have the authority to modify the recommendation of the audit team, due to inconsistencies identified in the audit report.
- c) Request that the CoC auditors clarify or expand any section from the audit report.
- d) Dismiss a nonconformity.
- e) Issue a new nonconformity.
- f) Review an appeal based on a certification decision.

## 4. TYPES OF AUDITS

The 2015 CoC Policy establishes 5 types of audits for evaluating operation compliance with the 2015 CoC standard.

- a) The CB shall record each audit process, when required, for the different type of audits in the Certification Database at the time the operation confirms the audit date, as this will be part of CB Monitoring & Evaluation (See section 4.4 of the Rules for the Authorization of Certification Bodies). For POs where an audit is not required, CB shall complete the required updates in Certification Database.

#### 4.1 Certification audit

A certification audit is carried out when the organization applies for Rainforest Alliance certification for the first time, and then every three years.

- a) The CB shall complete the next certification audit process before the certificate expires.
- b) PO shall complete a CRA at least 3 months prior to their certificate expiration date. The CB shall verify and review the CRA results in order to initiate the new audit and certification process.
- c) If the CB does not have a new certification audit process activated when the certificate expires, the certificate will be cancelled automatically in the Certification Database.

#### 4.2 Verification audit

The CB shall conduct a verification audit when the organization receives major nonconformities as a result of an annual or certification audit or for PO's who have minor nonconformities that need to be resolved and there is no annual audit required per their risk level. When a verification audit is necessary, the CBs shall adhere to the following additional timeline:

- a) For closure of major nonconformities the verification audit shall be completed and a final certification decision made within 120 calendar days after having received the previous certification decision.
- b) For closure of minor nonconformities the verification audit shall be completed within 15 months of the certification decision.
- c) A new report checklist shall be used by the auditor which includes only the required elements related to verification on the nonconformity.
- d) CBs shall upload the final certification report to the Certification Database in the time required in Section 7 - Audit Report and Review of this document.

#### 4.3 Annual Audit

Annual audits are conducted according to the risk level of the PO. They may be on-site or desk depending on where the PO falls in their certification cycle.

- a) Annual audit shall take place between three months before and three months after the anniversary date of the certificate.
- b) Annual audits shall evaluate all applicable criteria and corrective actions of open minor non-conformities.

#### 4.4 Research Audit

Research audits are carried out in response to a claim or complaint regarding a PO with the potential to result in a major nonconformity. They may be conducted at any time in the certification cycle.

- a) If the complaint only pertains to the performance of the multi-site administrator regarding the multi-site standard requirements, the Research audit shall apply only to it.

- b) If the complaint pertains to the performance of one or more-member sites regarding applicable standard documents, the sample shall only consist of the sites included in the complaint. If the complaint pertains to both the administrator and the member sites, both shall be audited.
- c) In the checklist, the CB must only record the criteria on which the research audit was focused.
- d) Where a research audit is required, the PO will cover the costs of these audits.

#### **4.5 Non-programmed audit**

Non-programmed audits are carried out as a method of supervision by the CBs. They may take place via desk audit if it is possible to evaluate conformity. Non-programmed audits may be conducted at any time during the certification cycle.

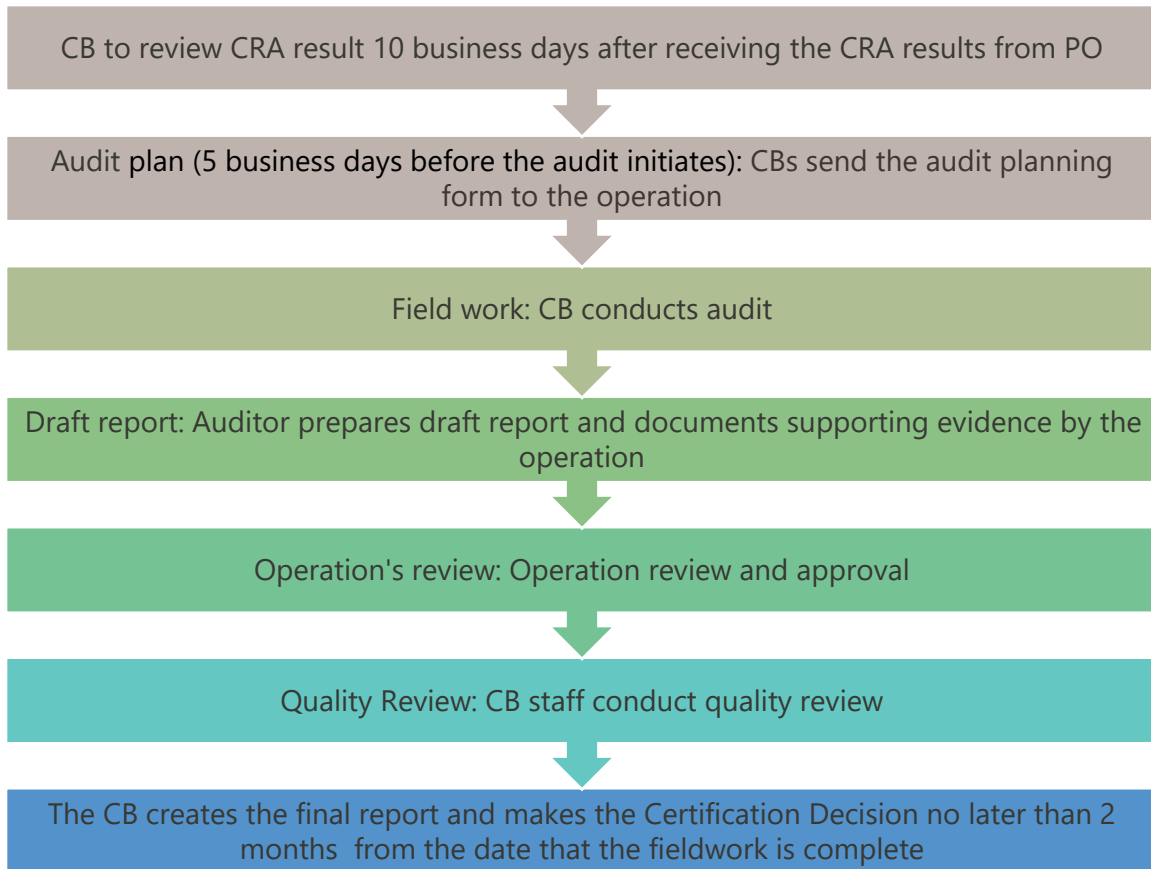
- a) The CB must assign 10% of all annual audits to be short-notice or unannounced for quality assurance purposes.
- b) The CB may inform the PO about these audits no more than 5 business days in advance and the PO will cover the costs of this audit
- c) The CB must record in the Certification Database the non-programmed audits that have taken place.

## **5 AUDIT PREPARATION**

The sections below describe the audit preparation process that CBs shall follow.

### **5.1 Certification process timeline rules**

- a) The CB is responsible for complying with the maximum timelines defined and recording the process in the Certification Database within the applicable milestone dates (for details of the timelines, see the next section).



**Figure 1: Illustration of the general certification process when the certification decision is approved and corresponding timing for each step. These basic elements apply to all chain of custody audits as described in the CoC Certification Policy.**

- b) This timeline can be extended if the certification is not granted:
- 1) From the certification decision date, the CB has 120 calendar days to perform a verification audit and have a new certification decision within this period.
  - 2) From the appeals date the CB has 30 calendar days to review the appeal.

## 5.2 CRA receipt and review

- a) The start of a new certification process begins when a PO sends the CRA result to the CB or the CB shall request from the PO the result of the CRA in order for the CB to determine the audit type, budget and duration. The PO shall send the CRA report to a CB within 1 month of receiving the CRA results from Rainforest Alliance.
- b) The CB shall send a welcome package that includes the 2015 CoC Standards, Policy and Application form with the applicable procedures.
- c) Within 10 business days of receipt of the CRA report the CB shall review the report to ensure the following are in line with CB understanding of the PO:
  - a. All sites handling/purchasing Rainforest Alliance Certified products have been included
  - b. The company type and crop are accurate

- c. CRA questions have been answered correctly
- d) CB shall contact Rainforest Alliance if there is any discrepancy between their knowledge of the PO and what is written/provided in the CRA report prior to scheduling or conducting a CoC audit of the PO. CB shall wait to initiate audit process until the discrepancy has been resolved by Rainforest Alliance.
- e) The CB shall inform POs to complete a new CRA prior to the start of a new certification cycle or when the PO changes information, such as adding a new site, new product or new process which would require a change in certification scope.
- f) CB shall contact Rainforest Alliance with any change in legal name or contact information of the PO.
- g) The CB shall ensure that the PO's record in the *Rainforest Alliance Certificate Database* is updated based on any changes to the PO's information or certification scope.
- h) The multi-site member list must be uploaded at the time of report finalization each year, when changes occur.

### 5.3 Audit plan development

- a) CBs shall provide POs with an audit plan at least 5 days in advance of the on-site or desk audit process, with the exception of research and non-programmed audits. The objective of the audit plan is to describe all activities for the audit process which includes the following aspects:
  - a. The composition of the audit team, indicating names and roles of the auditors and experts who will participate in the audit
  - b. The date that the audit will occur including the time required to perform the audit
  - c. PO information that impacts the audit process
    - i. Single/Multi-site
    - ii. Number of sites
    - iii. CRA risk level for each site
    - iv. Crop/product information and related process
  - d. Documents and records to be available for the audit process
  - e. Agenda for the audit

### 5.4 Factors to consider when planning audits

- 1) To prepare for the audit the CB shall review the following factors to be evaluated and recorded, including but not limited to:
  - i. Geographic location of the operation – address, state, country;
  - ii. Type of operation;
  - iii. Number of Sites;
  - iv. Valid certifications under other schemes;
  - v. Risk level of each site?
  - vi. For operations that are already certified, the performance history of the operation regarding compliance with the 2015 CoC Standard

- 2) For research audits, CBs shall base their audit preparation and review on existing information about the operation to be investigated, which should include the above-mentioned factors. In addition, CBs shall consider:
  - i. The nature and seriousness of the complaint or incident reported or detected;
  - ii. The evidence presented and compiled to date; and

### 5.5 Multi-site sample planning

The CB shall ensure that the CoC audit reviews the selection of audit sample and must meet the following requirements:

- a) The CB shall audit a representative sample (see below for the definitions) of the PO's member sites to evaluate the effectiveness of the Internal Management System.
- b) Criteria of the Rainforest Alliance Chain of Custody Standard, according to the audit scope, will be evaluated at the site level for those sites that are part of the audit sample.
- c) The CB shall always audit at least two-member sites in any type of audit. Nonprogrammed audits are to be conducted based on the sample size below which may result in only 1 nonprogrammed audit.
- d) The sites of the Chain of Custody multi-site PO to be evaluated by the audit team shall be selected in such a way that represents the risk categories according to the completed CRAs for each site. The sample selection will be made only from those sites that fall into the low, medium, or high-risk category. Sites which fall into the very low risk category will not be part of the sample. For example, if a PO has 9 sites (3 low, 3 medium, 3 high), one site from each of these three categories shall be audited for the sample, totaling 3 audits.
 

When selecting sites for audit, the following factors shall be considered:

  - i. Geographic distribution;
  - ii. Activities and/or products produced;
  - iii. Size and complexity of participating sites;
  - iv. Areas of improvement of the management system identified by internal reports or external audits.
  - v. New sites, products or processes
  - vi. Risk level of the sites?
- e) For Chain of Custody audits, the CB may increase the size of the sample up to 1.4 times the square root of the total number of sites, in case of larger, multi-national POs whose sites are diverse in terms of their risk category and the activities they carry out.
- f) The CB shall use the following guidance to determine the sample size for each audit type. If the value of the sample size is not an integer number, the CB shall round it up to the next higher number.

Type of audit	Sample size
<b>i. Certification audit</b>	The sample of sites to be audited shall be equal to the square root of the total number of sites in the certificate.

<b>ii. Annual audit</b>	The sample of sites to be audited shall be equal to the square root of the total number of sites in the certificate.
<b>iii. Verification audit</b>	The verification audit checks whether the audited organization has satisfactorily addressed the non-conformities detected during a previous audit. Verification audits shall only apply to those sites that did not meet the certification requirements. A verification audit could also be used to add new sites that represent more than 25% of the total number of sites of a multi-site PO.
<b>iv. Research audit</b>	A research audit occurs in response to a claim or complaint about the performance of a certified organization. Research audits shall only apply to those sites included in the complaint.
<b>v. Non-programmed audit</b>	The sample size in non-programmed audits (desk or on-site) shall be equal to 0.25 times the square root of the total number of sites.

## 5.6 Interview Planning

The objective of the interviews shall always be to obtain information in the most objective and open way possible.

- a) CBs and/or auditors shall determine the total number of interviews and their distribution among the operation's workforce and administration to be able to calculate time and costs for the audit plans. The CB shall allocate sufficient time for the audit team to conduct the necessary interviews without having to rush or reduce the number of interviews due to time and cost pressures. The audit team can refine the number and distribution of interviews during the preliminary meeting according to factors such as the activities at the site, workers available and their responsibilities and distribution; and other factors related to information not available during the audit planning process.
- b) When selecting personnel to be interviewed the audit team shall consider, but not be limited to, the following:
  - i. The personnel responsible for important control points and areas of risk identified;
  - ii. Processing and handling activities in the operation during the audit;
  - iii. The open non-conformities for annual and verification audits, or the types of complaints or incidents for research audits;
  - iv. Existence of committees for matters such as occupational health and safety, working conditions; and

## 5.7 Audit team selection

- a) Only CoC auditors that are registered in the Rainforest Alliance Auditor Database and meet the respective requirements in the Rules for Auditor Competence shall participate in audits.
- b) For audit teams, CBs shall select the auditors that can carry out the audits specified in the audit plans. The CB shall consider additional auditor characteristics that shall be taken into account when selecting auditors, including:



- i. Experience in a particular geographic scope, production system or type of operation;
- ii. Language skills;
- iii. In the case of verification or research audits, the audit scope or the particular CoC standard criteria that will be evaluated;
- iv. The existence of potential conflicts of interest;
- v. Particular expertise of an auditor, such as occupational health and safety, interviewing techniques, or chain of custody;
- vi. For complex operations or cases, overall experience or communications, team leadership, and operation management skills;

### 5.8 Preliminary review of documentation

- a) CBs shall provide the audit teams with access to all the necessary information to conduct the audit for their thorough review before initiating the audit, which can include information from other sources or stakeholders. This information shall include, where applicable:
  - i. Chain of Custody report from Rainforest Alliance which includes trademark submission status, License Agreement status, Traceability volume information, Marketplace registration data including address, phone number, contact, etc.
  - ii. CRA result with inclusion of all sites to be included in certificate.
  - iii. Local legislation that applies to the management of the audited organization and that could have an influence on the audit;
  - iv. The 2015 Standard and requirements, including the relevant sections of this document;
  - v. Possible charges or complaints previously filed against the organization to be audited;
  - vi. Previous audit reports going back to at least the last certification audit; and
  - vii. Any other material or document related to the organization to be audited. This shall include copies of the report templates, formats for recording non-conformities, the closing meeting logbook and the list of documents to review based on the applicable criteria of the 2015 CoC Standard.

### 5.9 CB permitted support

The actions described in this section are permitted by Rainforest Alliance but are not required. CBs shall consult Rainforest Alliance if they have any questions or need more information about technical support during or related to certification processes. CBs shall also consult their respective accreditation bodies if they have any questions or need more information about potential conflicts with ISO requirements.

- a) Describe examples of compliance with standard criteria.
- b) Mention to the operation that there is the option of hiring a consultant or organization to help the PO to prepare for the audit and certification process.
- c) Provide sample documentation or other supporting materials to the PO that show how a fictional company has met CoC requirements.

- d) Describe a nonconformity during the closing meeting and in the audit report in such a way that the non-compliance and its cause are very clear, so that the operation knows exactly what it needs to correct.
- e) Providing general training about the CoC Standard and the requirements applicable to different types of operations, including standard interpretation by auditors for these types of operations. This training must be open to several operations.

#### 5.10 CB support not permitted

- a) Recommend specific actions or products for complying with the applicable CoC Standard, including providing corrective actions, designs for operations-specific infrastructure, or write or participate in writing required plans, policies or procedures;
- b) Give advice or directions, prescribe practices, or provide instructions to close nonconformities. CBs may, however, explain in detail the reasons that led to opening the nonconformities.
- c) Provide support or consulting services that could affect their impartiality in assigning non-conformities, evaluating corrective actions and making certification decisions;
- d) Combine or package offers or quotes for technical support with certification services; and
- e) Mix support and certification activities in any way that violates any of the requirements stipulated in the Rules for the Authorization of Certification Bodies.

## 6. AUDIT EXECUTION

### 6.1 Opening Meeting

- a) The audit team shall initiate each on-site audit with an opening meeting conducted by the CoC auditor in the presence of all audit team members that are assigned to audit the site at which the main opening meeting occurs and representatives of the audited operation. The main topics to be addressed are:
  - i. Presentation of the audit team;
  - ii. Confirm the audit plan explaining the objectives and the extent of the audit program as well as the audit scope;
  - iii. Indicate the versions of the standards to be evaluated;
  - iv. Provide a brief summary of how the audit activities will be carried out and the time required;
  - v. Explain the concepts of confidentiality and conflict of interest within the audit process, including the need not to reveal the names of interviewed workers unless they grant permission;
  - vi. Indicate that auditors can take photographs as evidence, but under the framework of the confidentiality policies of the CB;
  - vii. Indicate the number of and types of workers to be interviewed and their protection during the interviews, and confirm their availability;
  - viii. Provide the audited organization with an opportunity to ask questions and present preliminary information.

- b) The audit team shall record the names of the meeting’s attendees, and agreements made and any objections or concerns of the operation’s representatives.

## 6.2 Compiling and documenting Evidence

CBs shall provide clear and concise evidence to document compliance and non-compliance during the audit. The best auditing practices recognize three ways of compiling evidence: document reviews, interviews, and observations of operations.

- a) The audit teams shall verify findings between different types of evidence—“triangulating” the evidence—whenever possible the audit teams shall record it and use it as a basis to expand the audit scope or the collection of evidence.
- b) The audit teams shall record the evidence in sufficient detail so that the management of the operations can identify the site and the nature of the non-conformities and deduce possible causes and solutions. Details that could negatively affect workers shall be kept confidential except when workers are in a situation that could be a threat to their health or safety. An example would be if a particular worker has not been trained in the safe use of particular equipment.
- c) Individual auditors shall keep notes of evidence for the CoC Standard criteria that they audit. The audit team can complete an audit checklist provided by the CB with a summary of the consolidated evidence from the team members for each CoC Standard criterion. The summary should clearly describe the reasons why the operation has complied or not complied with the CoC Standard criteria, and the extent or magnitude of any non-compliance. CBs shall keep notes of evidence for compliance and noncompliance with the CoC Standard criteria on file for at least three years.

## 6.3 Document Review

- a) The audit teams shall have access to all of the documentation listed below and shall review a sample of purchase and sales documentation related to the criteria of the applicable CoC Standard for the indicated audit scopes. In addition, the audit teams shall verify that the following supplied by the operation is accurate or, if not, they shall obtain the correct information:
  - i. The information provided in the multi-site member list to crosscheck with the multi-site administrator and verify the status for all members;
  - ii. Type of Operation, including type of product purchased and type of product sold;
  - iii. Supplier Information: list of suppliers with certification status;
  - iv. Transaction Certificates approved for product sold (when applicable);
  - v. Purchase and Sales documentation: Invoices, shipping documents, etc. for all purchases and sales of Rainforest Alliance Certified products;
  - vi. List of Rainforest Alliance Certified crops;
  - vii. If applicable, the amount of certified product sales from last year; and

- viii. For operations that use the Rainforest Alliance Certified™ seal, documentary evidence that the uses have been approved and copy of valid License Agreement.
- b) The audit teams shall provide the correct information in the audit report and multi-site member list along with any justification for the differences. The CB is responsible for updating these revisions in the Certification Database.

#### 6.4 Analysis of audit findings

- a) When the CoC auditor is confident that all of the 2015 CoC Standard criteria and other requirements have been covered, the audit team shall compile evidence and any other relevant information collected during the audit. The audit team shall evaluate the information and make decisions together regarding non-conformities related to the scope of the audit based on the compliance framework described in the 2015 CoC Policy and in the 2015 CoC Standard. The CoC auditor shall ensure the quality of the evidence contributed by the audit team and the correct assignment of non-conformities.
- b) Audit teams shall record all non-conformities and consolidated evidence in the Audit report to ensure that all 2015 CoC Standard criteria were audited and to facilitate the recounting of evidence during the closing meeting.

#### 6.5 Closing meeting

- a) The CoC auditor conducts the closing meeting of the audit. The audit team participates according to the instructions of the CoC auditor. The audit team shall ensure that the following functions and activities are completed during the closing meeting:
  - i. Explain the rest of the certification process and its timeline, and emphasize that the audit team does not make the certification decision;
  - ii. Describe the main findings and the conclusions of the audit so that they are clearly understood by the operation, especially the nature and extent of non-conformities;
  - iii. Auditors shall clearly explain the audited organization each nonconformity and they may explain the reasons that led to opening the nonconformities;
  - iv. According to the 2015 Policy, operations can demonstrate compliance with open non-conformities by submitting compliance evidence within 2 weeks of the closing meeting. This only applies to non-conformities that can be closed through documentation. CBs should allow the representatives of the operation to question findings and submit evidence that could lead to modifications of conformity decisions within the time limits established by the CB;
  - v. Allow questions from the operation regarding potential improvements and corrective actions;
  - vi. Obtain documentation related to compliance with the CoC standard and verify any remaining information about the operation;
  - vii. Reiterate the commitment to confidentiality and limitations on the use of the information obtained;
- b) CoC auditors shall submit the completed checklists, verified information, and all other materials describing or containing compliance evidence to the CB. CBs shall maintain copies of this evidence in their files.

## 7. AUDIT REPORT AND REVIEW

### 7.1 Reporting timelines

- a) CBs shall adhere to the timelines highlighted in Section 5.1 related to report review and finalization.
- b) After the steps are completed as highlighted in Section 5.1 the CB takes the certification decision and completes the process in the Certification Database.
- c) Rainforest Alliance can require shorter deadlines in cases of research audits for high risk cases. Rainforest Alliance shall communicate shorter deadlines to the CBs carrying out the research audit during the audit planning process.

### 7.2 Draft report

- a) The CoC auditors are responsible for compiling the information from the audit teams, writing the findings and evidence in drafting the audit reports. The CoC auditor can request the participation of audit team members, including technical experts, with the approval of CBs. Report authors shall use the current audit report template for that type of audit as specified by Rainforest Alliance.
- b) For multi-site certificates, the CoC auditor is responsible for completing information in the checklist with verified sample details describing corresponding findings and evidence for each member site and at the multi-site administrator level.
- c) For verification audits, the authors should reference the original audit report and complete the full review of non-compliant criteria and indicate the additional information and the date of the verification audit. For new audit samples, the CoC auditor should complete evidence and findings for all criteria.
- d) The audit report shall include a description of the evidence obtained during the audit so that the reader understands the nature and magnitude of compliance issues. The descriptions of non-conformities shall not disclose costs, competitive or intellectual property information, names of employees or any information that could put the health or safety of the employees or operation owners at risk. Photos and copies of documents that support or demonstrate the evidence provided shall be annexed to the report but shall not be made public.
- e) The CoC auditors shall ensure that the audit reports are complete. The mandatory information for all certification and annual audit reports are:
  - i. Evidence of compliance and non-compliance for all criteria;
  - ii. The list of open non-conformities, which were closed with the evidence on compliance sent by the operation within the additional two weeks;
  - iii. Evidence of open non-conformities for other criteria.
- f) The CoC auditor shall send the CB the audit report, list of updated member sites and any evidence obtained during the audit.

### 7.3 Quality review

- a) As indicated in the Rules for the Authorization of Certification Bodies, CBs shall implement a documented review of the quality of all audit reports. CB assigns a quality reviewer and sends the draft audit report and additional evidence provided by the audit team.
- b) The quality reviewer shall consider the following elements according to the requirements of the Rainforest Alliance assurance system:
  - i. Correct interpretation of the 2015 CoC Standard criteria for the applicable audit scope;
  - ii. Assignment of non-conformities to the correct 2015 CoC Standard criteria;
  - iii. Verify that the evidence for all criteria and all non-conformities is described in a manner that is clear, concise, objective and expresses the nature, magnitude and correct technical basis of the non-conformities in relation to the standard;
  - iv. Verify that the conclusions of the report are consistent with the non-conformities reported;
  - v. Correct spelling and grammar without excessive use of jargon or colloquialisms; and
  - vi. Compliance with submission deadlines established in this document.
- c) The quality reviewer shall document recommended changes and any comments, observations and suggestions for improvement and send them to the CoC auditors.
- d) The reviewer shall evaluate the quality of the report and keep a record for each audit report including aspects to be improved, which will be used for the auditor performance evaluated by the CB and Rainforest Alliance.
- e) CBs shall maintain copies of the original draft audit report and the quality review teams' reports and incorporate them into quality assurance reviews as indicated in the CBs' quality management systems.
- f) The CoC auditor shall modify audit reports based on the comments, observations and suggestions indicated in the quality review. Any conflicts between the audit teams or CoC auditors' findings and the recommended changes must be documented and incorporated in the CB's quality management system for eventual reviews.

### 7.4 Report review by audited operations

- a) PDF versions of audit reports shall be generated after the quality review process and sent to audited operations for their review and comment. The following responsibilities and rights govern these processes:
  - i. CBs shall have a process that documents and responds to operations' comments about or conflicts with audit reports submitted for their review.

- ii. Audited operations shall review the information about their operations and notify CBs of any discrepancies or inaccuracies.
  - iii. Audited operations shall report to CBs any discrepancies or conflicts with respect to the non-conformities reported in the closing meetings and those described in the audit report. Operations have the right to challenge any new or modified compliance issues recommended by report reviewers or review committees, and to provide evidence to support their claims.
  - iv. CBs shall receive and process any comment, complaint or conflict related to audit reports according to their documented processes.
- b) CBs can consider the audit reports accepted when the operation does not communicate any comments or concerns within 10 business days. In this case, and when the operation rejects the decisions regarding the content of the reports despite clear technical justifications by CBs, CBs shall proceed with the certification decision, send the final report to the audited operation, and upload it into the Certification Database.

## 8. CERTIFICATION DECISION

### 8.1 Decision process

- a) CBs shall ensure that all the audited operations comply with all other requirements before issuing a certification decision.
- b) Certification decision makers shall justify their decisions based on the 2015 CoC Standard, the 2015 CoC Policy and related requirements. If these decisions result in modification of the audit team's findings or decisions, then CBs shall document the certification decision maker's justification for these modifications for review within CB's quality management systems.
- c) CBs shall use mechanisms to communicate certification decisions to audited operations that record the trail and acknowledgement of communications, such as electronic mail (with acknowledgement of receipt) and registered post. All digital letters and reports sent to audited operations shall be in PDF format.
- d) The CB shall complete the milestones in the Engagement record in the Certification Database. CBs shall upload all audit reports regardless of the certification decision. Registering the report and the decision in the Certification Database allows Rainforest Alliance to include data for the analysis of non-conformities and reasons for certification and for not passing certification. It is also important to record the results to track operations that seek certification with other CBs in the future.
- e) The CB shall indicate in the Certification Database those CoC criteria where the PO received a non-conformity.

## 8.2 Public Information

- a) After the final decision has been made, the system will generate the certificate code. Certification information will be made public on the Rainforest Alliance website.
- b) The list of certified Chain of Custody operations along with newly issued and cancelled certificates are published in the Rainforest Alliance website monthly.

## 8.3 Appeals

Audited operations can appeal the certification decisions of CBs according to the Rainforest Alliance CoC Certification Policy, and the procedures established by CBs. CBs must adhere to the following requirements and timeframe in their appeals procedures:

- a) The appeal shall be analyzed by an individual who did not participate in the audit or in the decision-making process related to the certification, who does not have any conflicts of interest related to the operation, and who shall have a level of CoC auditor.
- b) The CB shall not resolve appeals by changing the certificate scope in order to eliminate a problem in the scope of the certification granted.
- c) CBs shall resolve and communicate the result of any appeal within 30 business days.
- d) CBs shall indicate in their appeal procedure any associated fees.
- e) CBs shall maintain records of appeal processes that include the dates that appeals are received, decided, and communicated to audited operations, as well as the nature of the appeal and the decision made. These records shall be made available to Rainforest Alliance upon request.
- f) Only in the case where the audited operation is not satisfied with the result of the appeal process with the CB, the CBs shall communicate that they may appeal to Rainforest Alliance within five business days of the original appeal decision. The Rainforest Alliance appeal process will adhere to the same scope and requirements as described in this section. All decisions by Rainforest Alliance are final.
- g) The CB shall inform the operation the result of its appeal process. If an operation's appeal is accepted, the CB shall modify the original audit report to reflect the new certification decision and upload the new report into the Certification Database. If the appeal is not accepted, the certificate status is cancelled.

## 8.4 Issuing the Certificate

- a) CBs shall issue certificates only after operations have successfully passed certification audits or have successfully passed verification audits after failing certification audits. CBs shall also issue updated certificates for:
  - i. Operations that have undergone additional audits that necessitate changes in the certificate;



- ii. Operations that have changed their legal or commercial name; or
  - iii. Operations that have transferred to the CB, but only after the next programmed audit and a positive certification decision. In these cases, the certification decision date and certificate expiry date will not change.
- b) All certificates have a validity of 36 months from the date of the certification decision. When operations undergo verification audits after their first certification audit, the certification decision date corresponds to the decision date for the verification audit
- c) The status of the certification is subject to the results of subsequent audits and operation compliance with the 2015 CoC Policy and related requirements.
- d) The certificates issued by CBs shall include the following:
- i. The Rainforest Alliance Certified™ trademark in accordance with the *Requirements and Guidelines for Use of the Rainforest Alliance Trademarks*.
  - ii. The registered trademark of the CB and its contact information;
  - iii. The legal name and, if necessary, the trade name of the certified organization;
  - iv. The location of the certified operation;
  - v. A statement of conformity and the names of the Rainforest Alliance standards that were used as a reference;
  - vi. The effective date of the certification and its expiration date;
  - vii. List of sites included in certificate with company type
  - viii. Type of product sold
  - ix. The unique certificate code number is generated by the Certification Database, corresponding to each successful certification audit.

## 8.5 Exceptions

Exceptions to the requirements in this document can be granted provided the information below is included and approved by Rainforest Alliance.

- a) The CB will evaluate each application for exceptions received from a certified operation and once the information required is gathered send to Rainforest Alliance for their review and approval. The CB can analyze if the exception is applicable for the following:
- i. Compliance with a criterion
  - ii. Certificate or audit date extension
  - iii. Force majeure conditions: Extraordinary event or circumstance that is beyond the organization's control, and that prevents it from complying with these rules and Rainforest Alliance 2015 CoC Policy.

