



Accreditation Requirements

For Certification Bodies

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English Version SAN-R-1-2
Valid From: June 2015
Obligatory from: October 1st, 2015

June 2015



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SAN Official Languages Policy

According to SAN's Policy SAN-2015/003, the English version of a SAN document prevails over any translation and shall be used as the only reference to resolve interpretation disagreements.



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Introduction

The Sustainable Agriculture Network (SAN) and the Rainforest Alliance (RA)

The Sustainable Agriculture Network is a coalition of non-profit conservation and rural development organizations in the Americas, Africa, Europe and Asia promoting the environmental and social sustainability of agricultural activities through the development of good practice standards, certification and the training of rural producers throughout the world.

Standard and certification policy development and review is coordinated by the SAN Secretariat. Farms and group administrators that comply with SAN standards can apply to use the Rainforest Alliance Certified™ seal for products grown or raised on their certified farms. For more information about the Sustainable Agriculture Network, visit our website: www.san.ag.

The Accreditation Program

The Sustainable Agriculture Network is proud of its distinctive nature based on the understanding of local cultures, languages, policies, and ecology. As the SAN/RA system expands further globally, we aim to keep our distinctive nature as a highly credible and rigorous system. The audit and certification services rendered under the SAN accreditation system shall maintain and ensure the general sense of shared 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 of the SAN and Rainforest Alliance. Access to the system by smallholders is important to the SAN, and smallholders should not be at a disadvantage or excluded from accessing certification services. SAN registered auditors should be local and hired by local companies or organizations, to the extent possible.

The SAN accreditation system is based on *ISO/IEC Guide 17065 (General requirements for bodies operating product certification systems)* with additional SAN requirements developed by SAN technical experts. It is monitored by the independent SAN Accreditation Body, responsible for evaluating conformity of certification bodies with the *SAN-R-1-2 Accreditation Requirements for Certification Bodies*.

1. Objectives of the Requirements



The objectives of the *SAN-R-1-2 Accreditation Requirements for Certification Bodies* are:

- a) To communicate the general requirements that certification bodies shall fulfill in order to be accredited by the SAN/RA Accreditation Body and to explain the requirements for certification bodies wishing to be accredited to grant SAN agriculture and cattle farm, group administrator or Chain of Custody certification.
- b) To ensure adequate monitoring of the technical and administrative capabilities of the certification bodies and their audit teams.

2. Scope and Implementation

The SAN/RA certification system is based on the evaluation and monitoring of the client's socio-environmental management, product processing and handling and product traceability system, in combination with the monitoring of the production practices. Interviews, document reviews and on-site observations are used to verify that the production or processing systems used by the organizations comply with SAN standards.

This document lays out the requirements for all certification bodies wishing to conduct audits based on SAN standards and issue SAN/RA certificates to farms, group administrators or Chain of Custody Participating Operators wanting to claim their agricultural or livestock products as *Rainforest Alliance Certified™*. Evaluation of conformity with these *SAN-R-1-2 Accreditation Requirements for Certification Bodies* is carried out by SAN/RA's independent Accreditation Body.

This version of the *SAN-R-1-2 Accreditation Requirements for Certification Bodies* substitutes the previous June 2012 version and is binding for Certification Body accreditation processes starting on October 1, 2015 according to the SAN Secretariat's instructions. These requirements cover the *SAN Auditor Competence Requirements* and other requirements related to quality processes and data management.

The *SAN Auditor Competence Requirements* define the responsibilities of the Certification Body (CB), the SAN Secretariat, and the Accreditation Body (AB) as far as auditor competence is concerned; establish the requirements relating to the training and registration of auditors and auditor trainers; define the structure and content of the program for building the competence of auditors and auditor trainers; and establish the requirements for the performance evaluation of auditors and auditor trainers.

3. General Conditions of the Accreditation Process



- a) All candidate certification bodies (CBs) that comply with all pre-evaluation requirements may apply for a pre-evaluation by the SAN Secretariat by sending a written expression of interest via e-mail to accreditation@san.ag.
- b) Only candidate CBs approved through SAN's pre-evaluation process and who have signed a pre-accreditation agreement with SAN and RA shall be able to request accreditation from the Accreditation Body (AB).
- c) The *Pre-Accreditation Agreement* grants the CB the permission to use the SAN standards and policies, and the Rainforest Alliance Certified™ seal with the condition that the CB becomes accredited within 18 months of signing the agreement and is in accordance with the "Requirements and Guidelines for Use of the Rainforest Alliance Trademarks".
- d) CBs shall demonstrate their capacity and conduct auditing and certification activities during the accreditation process. When accreditation is awarded, the CB signs an agreement with the Accreditation Body.
- e) The existence of a valid *Pre-accreditation agreement* is a condition required for a CB to achieve and maintain accreditation. CBs shall be accredited under ISO65 or ISO 17065 before 1 October 2015. After that date, CBs shall be accredited under ISO 17065.
- f) Once the document review phase of the accreditation process by the AB has been concluded, the AB can authorize the CB to conduct initial audits and make certification decisions for the purpose of demonstrating CB capacity to offer certification services. **The CB shall not issue any SAN certificates until it has been informed of its successful accreditation by the AB.**
- g) The AB will conduct an onsite assessment visit to the CB once the CB has received at least one application and has scheduled an audit, witnessed by the AB.
- h) SAN periodically publishes new or revised standards and policy documents via its intranet (accessible at www.san.ag). CBs shall have a system to ensure that the most recent versions of all SAN standards and policy documents are applied and used as reference as indicated by SAN and according to SAN timelines. For the different scopes, the AB bases its evaluation of the CB on the valid versions of standards and policies available on the SAN website or intranet (available at www.san.ag).
- i) Each candidate CB shall:
 - i. Guarantee the competence of its audit team, in accordance with the specifications of the *SAN Auditor Competence Requirements*, and
 - ii. Shall only use SAN registered auditors, with corresponding competence to audit to the certification scopes for agriculture farms and group administrators, cattle production systems and Chain of Custody Participating Operators.
- j) To meet the requirements stated in ISO 17065 clause 4.2.6, CBs must ensure that:
 - i. Technical assistance is not offered as a consultancy to current or potential certified clients in any area related to the implementation of the Sustainable Agriculture Standard best practices or group management system requirements.
 - ii. Any educational activities about the standard or its implementation is general in nature, is not tailored to a specific client, is open to the general public, and is not part of the audit process. Fees may be charged.
 - iii. Information offered regarding the interpretation of or compliance with the Sustainable Agriculture Standard should be general in nature and not specific to a client's audit findings. Examples of good practices related to the standard, including photographs and descriptions of other clients' compliance efforts, are permitted if presented as examples and not as a recommendation for compliance.
 - iv. Technical staff shall comply with conflict of interest policies and procedures established by SAN and the CB, and their activities must not compromise the impartiality of audit and certification decisions.



- k) All Candidate CBs shall comply with the requirements and procedures of the AB.
- l) A CB is only allowed to conduct audits and certification processes for agriculture and cattle farms, group administrator or Chain of Custody Participating Operators *defined in the scope of the accreditation* granted by the SAN and AB. A specific geographic scope, by country, is also defined for each CB but approved by the AB and SAN.
- m) In order to audit organizations and issue SAN/RA certificates in any country, the CB shall demonstrate to the AB that it has the technical capacity to offer audit and certification services in that country, including the capacity to receive and process complaints by local stakeholders. The CB shall have knowledge of the respective local environmental, socio-labor and agricultural legislation and, when applicable, implement the respective SAN local indicators or means of verification, where available in official SAN documentation.
- n) At any time during the certification cycle, the SAN may require the CB to conduct a research audit of any certified operation in order to address compliance risks in the certification system. SAN may also request the CB to conduct targeted non-programmed audits. The CB shall implement these audits in a timely manner and upload to the *SAN Certificate Database (SCD)* a written report of the audit within 2 weeks of completing the field work.
- o) SAN accreditation is valid for four years from the date the first accreditation certificate is issued by the AB, subject to the CB demonstrating continued conformity with applicable SAN standards and policies, and AB requirements through corrective actions of the nonconformities detected by the AB or quality monitoring checks conducted by SAN.
- p) The CB is subject to the AB's sanctions program. The AB may consult the SAN on the consequences of major nonconformity with these requirements.
- q) All inquiries regarding this document or of topics not covered by this document, shall be presented in writing to the SAN Secretariat via e-mail to accreditation@san.ag to be analyzed and decided by the SAN Secretariat in consultation with the AB.

4. Scope of the Accreditation

- a) The SAN/RA certification scope includes the products and the processes used to produce, process and label products using the *Rainforest Alliance Certified™* seal, as defined by the respective SAN/RA policies for agriculture and cattle farms, group administrators and Chain of Custody Participating Operators. The processes include the physical resources used, such as the land, buildings, plants, animals and equipment, and the human resources used for producing, harvesting and handling them as defined by the respective SAN/RA standards and policies.
- b) A CB can choose the scope of SAN accreditation: 1.) agriculture farms + group administrators 2) cattle production systems 3.) Chain of Custody.
- c) SAN accredited CBs shall only conduct audit and certification activities in the countries listed in Annex 1, and in the countries for which the CB has been authorized by the AB for audits and certification activities. The SAN/RA Chain of Custody certification accreditation scope can be applied in any country globally, there are no country restrictions.

5. Operational Requirements



5.1 General Provisions

- a) The AB, the SAN and Rainforest Alliance are entitled to observe, at their own discretion and cost, any audit or related administrative process or activity conducted by a CB with respect to the certification process under the scope of SAN or SAN/RA standards and policies.
- b) The CB shall formally communicate in writing the issuance or cancellation of the SAN/RA certification to the agriculture farms, cattle farms, group administrators or Chain of Custody Participating Operators, according to the applicable SAN policies.
- c) The CB shall adhere to all operational guidelines which establish the requirements on how to manage certification cycles, certificates and the data collection, verification and management procedures to support high quality certification processes.

5.2 Governance of the Certification Body

- a) The CB shall have an advisory committee comprised of a majority of members who are not owners or employees of the CB and have no financial interest in the results of individual certifications or performance of the CB.
- b) The advisory committee is responsible for supervising the implementation of all CB policies, focusing on ensuring impartiality, independence, confidentiality and objectivity.
- c) The advisory committee shall include representatives of certification process stakeholders.
- d) The terms of reference for the advisory committee shall be documented and include a mechanism through which the members can discuss their concerns regarding the performance of the CB directly with the AB.

5.3 Insurance and Finances of the Certification Body

- a) The CB shall provide evidence regarding the validity of extra-contractual civil insurance to cover damages and losses caused to third parties and contractual civil liability policy for damages and losses caused to third parties as consequence of errors or omissions during the certification process, and a fidelity policy to protect the property and confidentiality of the production technology used. If this insurance is not available in the CB's home country, or does not cover one or more of the countries within the geographic scope of the CB, evidence of sufficient financial reserves, including a plan for their use, shall be provided for covering any potential liability or civil claims.
- b) The CB and/or its parent organization shall ensure financial stability.

5.4 Sub-Contracting of Inspection Body Services

This section refers to the assignment of work to an Inspection Body (IB) independent from the CB that conducts all or part of the CB's audit activities using its own processes.

- a) IBs and their hired personnel shall comply with all processes and procedures of the CB, except in areas that clearly differentiate the purpose and scope of their work agreement with the CB.
- b) The certification decision and adherence to all rules regarding the SAN certification process shall be the full responsibility of the CB.
- c) The CB shall inform the SAN and the AB of the name of any subcontracted IB carrying out all or part of the audit activities by sending the name, and a description of work scope, of any contracted IB in an email to accreditation@san.ag. This notice shall be sent to the SAN and the AB prior to the start of any IB subcontracting arrangement.



- d) When a CB sub-contracts an IB to conduct audits, the inspection body shall comply with the requirements for a Type A IB under ISO 17020.
- e) The following documents constitute acceptable evidence of compliance by a sub-contracted IB with ISO 17020 and with the terms of the commercial agreement between the CB and the IB:
 - i. An accreditation certificate issued by the AB with an inspection scope in accordance with SAN standards; or
 - ii. A record of a second party audit conducted by the CB within the last 12 months, proving that the IB complies with ISO 17020 and has no pending major non conformity. In this case, this audit team under ISO 17020 shall include at least one member with knowledge and a minimum of five years of experience in managing inspection, certification or accreditation bodies.
- f) The CB shall conduct evaluations of the IB's work every 12 months to ensure adherence to all SAN certification process rules, and these evaluations are subject to review by the AB.
- g) The agreement between the CB and the IB shall include at least the following:
 - i. The IB shall follow the same requirements established by the CB for its own personnel. These requirements shall include compliance with *SAN Auditor Competence Requirements* and other requirements related to quality processes, confidentiality and conflict of interest. The IB shall provide a copy of this service agreement to the CB.
 - ii. The IB shall ensure that an agreement exists between the CB and the client that shall include, as part of its terms, allowing for inspections to be conducted by the IB, with terms similar to those for clients serviced by the CB.
 - iii. The CB, and not the IB, shall address and bring to resolution any appeals made by the clients in relation to the certification process and activities.
 - iv. While the IB may modify some documents provided by the CB, it shall only use these documents upon approval by the CB.
 - v. The CB shall ensure the accuracy of any documents translated by the IB.
 - vi. When the audit process is sub-contracted to the IB, the IB shall document the responsibilities for application, audit planning, audit execution and audit reporting and agree to these with the CB.
 - vii. If a CB sub-contracts audit activities, it shall notify the client and request written acceptance of the made arrangements. The notification may be included in the SAN Application Form, in which case the application is considered as the approval by the client.
- h) The CB shall ensure that the IB complies with the applicable requirements described in this document. The IB is responsible for providing compliance information to the CB, as well as the results of internal audit processes and corrective actions.

5.5 Quality Management System

- a) The CB shall have a documented quality management system for the SAN certification activities to support the SAN and RA missions and demonstrate the CB's commitment to excellence as a participant in the SAN system.
- b) The committee responsible for supervising the quality management system within the CB shall include one or more individuals experienced in the topics related to the SAN standards, quality management systems– such as ISO 9001, ISO 14001, ISO 65/17065, ISO 17020 – social and labor responsibility systems, sustainable agriculture and environmental management.
- c) The CB shall communicate to the AB modifications to the CB's quality management system that have a material impact on the operations of the CB or the IB, within a period of no more than 30 days after implementation.



- d) The CB shall have a documented and implemented procedure for monitoring the quality of its audits and certification processes. This system shall include, at a minimum:
 - i. Regular evaluation of audit team performance.
 - ii. Permanent evaluation of the performance of the Inspection bodies according to the processes required by the CB, including evaluation of the quality of the audits performed by the IB within the previous year.
 - iii. Evaluation of a statistically representative sample of the client portfolio regarding:
 - 1. Customer satisfaction of the client and/or its audited organizations;
 - 2. General performance in services rendered;
 - 3. Competence of personnel;
 - 4. Accuracy of field evaluation process;
 - 5. Certificate holder inquiry resolution time;
 - 6. Complaint and appeal resolution time;
 - 7. Report submission time;
 - 8. Audit report quality.
 - iv. The results and analysis of the certificate holder's evaluation process shall be shared with the AB annually and shall include, at minimum:
 - 1. Certificate holder satisfaction level and evolution;
 - 2. Guidance on service aspects that may improve satisfaction;
 - 3. Identification of priority areas where improvements could be made.
 - v. The CB shall enter all information required by SAN in the *SAN Certificate Database (SCD)* and perform data quality checks on a regular basis according to the *SAN Data Guidelines - Field Definitions*.
- e) The CB shall determine the composition of the audit team and the number of audit days for each client/certificate holder in accordance to the risks identified for the operation, including but not limited to:
 - i. Geographic location of the operation – region and country;
 - ii. Size of operation;
 - iii. Type and complexity of the operation;
 - iv. Social risks (see Annex 2);
 - v. Crops ;
 - vi. Number of workers and type of workers (temporary and full- time);
 - vii. Types of infrastructure on the farm (housing facilities, health facilities, product processing facilities, roads, etc.).

5.6 Internal Audit

- a) At least once every 12 months, the CB shall conduct an internal audit of all operations and key activities based on *SAN-R-1-2 Accreditation Requirements for Certification Bodies*.
- b) The CB shall conduct an internal audit and management review before it is granted accreditation, and shall demonstrate an acceptable annual plan for conducting management reviews.
- c) The CB shall submit results of the periodic internal quality system audits and their corresponding corrective action plans to the AB. The frequency of the internal audits may be agreed upon between the AB and CB, or as requested by the SAN Secretariat.

5.7 Procedure for Dissemination of SAN Standards and Policies



- a) The CB shall ensure that all auditors are trained by SAN registered trainers on the updated versions of the SAN and SAN/RA standards, policies, systems and guidelines, within the timeframe defined by the SAN Secretariat.
- b) The CB shall have a policy and a procedure in place to deliver the updated versions of the SAN and SAN/RA standards and policies to all certified organizations and to those applying for an audit.
- c) It is the CB's responsibility to translate SAN documents to languages other than English and Spanish. The English version of the document shall be used as reference to settle any interpretation or translation dispute.
- d) CBs shall comply with implementation timelines and requirements associated with the introduction of a new or revised SAN and SAN/RA standard or policy, where the SAN Secretariat will issue guidance on managing the certification processes affected.

6. Certification Body Personnel

6.1 General

- a) The CB shall employ the human resources necessary to comply with these SAN accreditation requirements who have technical knowledge covering SAN and SAN/RA standards and policies to conduct the activities within its accreditation scope.
- b) The CB shall maintain the competence of the technical personnel of the CB, including the Certification Committee, within the framework of training required by the *SAN Auditor Competence Requirements*.
- c) The candidate CB shall guarantee the competence of its audit team, in accordance with the specifications of the *SAN Auditor Competence Requirements*, and shall only use SAN registered auditors whose competence corresponds to the certification scope for agriculture farms and group administrators, cattle production systems and Chain of Custody Participating Operators.
- d) The performance of all CB personnel shall be evaluated at least once per year, including part time, full time and contract employees. The CB shall have auditor evaluation procedures that ensure the technical competence of permanent or sub-contracted personnel, following the rules and guidelines established by the *SAN Auditor Competence Requirements*.
- e) The CB shall ensure it has a procedure to verify that the audit team composition for audits shall be led by a lead auditor registered for the appropriate scope of the operation being audited.
- f) The CB shall register auditors in the *SAN Certificate Database (SCD)* according to the following:
 - i. The CB shall only register auditors in the database if they meet the *Auditor Competence Program* requirements and are authorized to conduct audits within the SAN/RA system, according to the auditor category and scope to offer auditing services.
 - ii. Each CB shall manage information only for auditors working with their organization and with inspection bodies subcontracted by them. Those auditors who work with more than one CB or IB, will have a single record in the database.
 - iii. The CB shall maintain a unique registration for each auditor and the information collected includes: personal information, information regarding compliance with the *SAN Auditor Competence Requirements*, category and scope authorized to audit, training and audit records, and sanctions applied.
 - iv. The CB shall record the annual training plan for auditors of their organization in the appropriate section of the database.



- g) The CB shall ensure the competence of its personnel, in accordance with the local conditions of their approved audit scope, including aspects such as applicable local legislation, definition of high value ecosystems and natural ecosystems, social and labor requirements, and agricultural production techniques, in addition to knowledge of the SAN standards, audit practices and procedures.
- h) The CB shall provide the SAN Secretariat with requested contact information for staff responsible for various aspects of the certification process, and ensure those individuals participate in required training by the SAN Secretariat about SAN/RA certification system documents, systems and processes.
 - i. If a CB operates in multiple geographic regions and will have multiple staff managing the information required in these requirements, the CB shall provide the SAN will the contact information for each of the data handlers, as requested by SAN. The CB shall maintain one person primarily responsible for SAN/RA information management. The CB shall inform the SAN of any changes in the contact information or roles of the data handlers.

6.2 Conflict of Interest

- a) All CB personnel, including certification committee and advisory committee members shall complete a record stating any potential or existing conflicts of interest including property, financial and family ties with certificate holders or clients.
- b) This record shall be updated before the next review by the AB, or when a potential conflict arises, and at least once per year.
- c) The CB shall implement a procedure to review all conflict of interest statements and analyze which could constitute a possible conflict requiring attention.
- d) When a conflict of interest exists, the respective individuals shall not be involved in the related audit or certification decision processes.
- e) The CB shall document and implement a code of conduct to be applied by each employee and contractor. The code of conduct shall include orientation for employees and contractors on the prohibition of acceptance of gifts and define clear instructions on the measures to be taken in case of bribery or coercion. In case bribery or coercion of a registered auditor or a member of an independent committee is suspected, the CB shall report this situation to the SAN secretariat and the AB.
- f) The CB shall have a conflict of interest disclosure policy for its auditors to ensure that its auditors report any potential or real conflict of interest in any given auditing situation. This policy should cover situations where auditors are not allowed to audit the same farms, group administrators or participating operators where they conducted technical assistance activities in the two previous years, including:
 - i. Having worked in the last two years for a client, one of its subsidiaries or a company of the same parent group.
- g) All audit personnel shall declare whether or not there is a conflict or potential conflict of interest with the client and shall declare any potential conflict when there is a conflict. If a potential conflict is declared, the CB shall analyze it and, if necessary, shall assign another auditor or take other measures to resolve the potential conflict.



- i. If the auditor is part of the CB's permanent personnel, the conflict of interest declaration shall be made at least once per year and could be covered in a single document specifying the responsibility of the auditor to declare any potential conflict upon engaging with a particular client.
 - ii. In the case of sub-contracted auditors, one conflict of interest declaration shall be signed for each auditor in the service agreement.
- h) The CB shall have a conflict of interest disclosure policy for its personnel where the personnel involved in making certification decisions shall confirm, for each decision made, that no conflict of interest exists. If a conflict of interest is declared, the person shall exempt itself from the decision-making process.

6.3 Additional Experts Accompanying Audit Processes

- a) Specialized technicians or experts may be used to provide knowledge and experience to the audit in areas where the audit team lacks that knowledge. If a specialist is used, his/her role shall be limited to advising a SAN registered auditor.
- b) If a specialist is used, the CB shall require the specialist to sign a confidentiality agreement and conflict of interest disclosure.
- c) If a client presents an objection due to a real or potential conflict of interest of an auditor or expert, the CB shall consider the objection and, if justified, shall not use that person in the audit.
- d) The same lead auditor may not conduct audits for the same organization for more than two consecutive years.

7. CERTIFICATION PROCESS

7.1 Application

- a) Before accepting an application from an applicant interested in certification, the CB shall ensure it has the resources and personnel necessary to conduct the audit.
- b) The CB shall send the SAN Application Form, standards and policies to the applicant. When the application is sent, the CB shall register the date in the *SAN Certificate Database (SCD)*.
- c) At the time a Participating Operator (PO) applies for Chain of Custody, the CB shall request from the PO the result of the Chain of Custody Risk Analysis (CRA) in order for the CB to determine the audit type and duration.
- d) Once the application is approved, the CB shall enter the application information as requested into the *SAN Certificate Database (SCD)*.
- e) All CBs shall use the SAN Application Form which shall contain sufficient information to write an audit plan and assign a team of auditors accredited for the scope requested.
- f) The CB shall have a procedure to ensure the quality of the client service process and respond to requests for information from SAN, including collection of annual crop volume and productivity information of the products included in the certification scope.
- g) The CB shall ensure that the information provided by the client or certificate holder in the application form is accurate and complete.



- h) The CB shall ask its certificate holders to send an updated application form (including a CRA application for CoC) for each certification cycle, or every 36 months, or when the certificate holder changes information (such as a change in the contact) or the certification scope. A revised application shall be completed annually during the cycle when there is any update to the certificate holder's information required by SAN and Rainforest Alliance, a change in the certificate holder's information, or when there is a change to the certification scope requested by the certified organization. The CB shall ensure that the client's record in the *SAN Certificate Database (SCD)* is updated based on any changes to the certification holder's information or certification scope.

7.2 Service Agreement

The CB service agreement with the client shall at least include the following elements. These elements shall be included in the service agreement for all new clients, and shall be included in a revised service agreement for existing clients at the latest *upon the start of the next certification cycle*.

- a) Requirement to conform with certification policies and requirements, inform the CB of changes that may impact the status of the certificate, agreement to undergo surveillance audits as required by the policies, and to close out nonconformities required to maintain valid certificate.
- b) The scope defined in the application and the offer of service made by the CB.
- c) A provision that states that the AB, the SAN Secretariat and Rainforest Alliance are entitled to visit, at their own discretion and cost, any certified organization, with or without notification to the CB.
- d) A clause giving the right to SAN to require the CB to conduct a non-programmed or research audit to a certified farm, group or participating operator.
- e) A clause giving the CB the right to publish the audit report summaries for all certified operations. The agreement should include a provision that states that the SAN can publish these summaries on the SAN website.
- f) A requirement to adhere to the *Basic Guidelines for Use of the SAN logo* and the *Requirements and Guidelines for Use of the Rainforest Alliance Trademarks*.
- g) A clause outlining the rules for certificate cancellation according to the *SAN Certification Policy* (clauses 2.7.2 and 2.82) and *SAN/Rainforest Alliance Chain of Custody Policy* (section 6).
- h) A clause granting the CB, Rainforest Alliance, SAN, or the AB the right to access and review any of the client's documentation, and the right to inspect any of the client's sites and operations in the certification scope.
- i) A requirement to adhere to the timelines established by SAN for the certification process, as defined in this document.
- j) A clause stating that the client has the right to appeal any certification decision according to the guidelines in section 8 of these requirements.
- k) Clauses permitting SAN and Rainforest Alliance to use data for analyses or reports about the program.
- l) A clause informing clients and personnel about their right to access records and about any applicable costs or restrictions.
- m) A clause requiring the client to acknowledge that it may not use the Rainforest Alliance Seal other than pursuant to the terms of a valid written license agreement executed between the client and Rainforest Alliance.



7.3 Administrative Process

- a) The CB shall have a documented procedure to determine the costs of the audit process in order to indicate actual cost parameters that will prevent unfair competition. These shall include cost estimates for each country where auditing and certification processes are conducted. The following categories are considered part of the audit costs:
 - i. Auditors' time (professional fees for field work, travel, report preparation);
 - ii. Transportation (local and/or international);
 - iii. Meals, lodging, administrative cost (communication, couriers);
 - iv. Administrative costs associated with the operation of the CB's system, such as time for technical review of the audit report and certification decision-making process.
- b) The CB shall allow a client to directly cover the cost of transportation, meals and lodging, as long as the impartiality of the audit team is not compromised.
- c) The CB shall have a defined mechanism to inform the clients about the audit processes and frequency, including the costs and disbursements, the processes for issuing and scoring non-conformities, the requirements for eliminating non-conformities, and the certification requirements pursuant to the valid SAN standards and policies.
- d) The CB shall inform the client about which documentation, resources and records shall be made available for the audit.
- e) The CB shall inform the client that all information collected during the certification process may be made available to SAN, the AB, or Rainforest Alliance.

7.4 Preparation for the Audit

7.4.1 The Audit Plan

- a) The CB shall prepare a written audit plan by reviewing the application and the documented management systems delivered by the client. A lead auditor may be designated to handle communication with the client and the development of the audit plan. The CB shall submit a copy of the audit plan to the client at least five (5) working days in advance of the on-site audit process.
- b) The audit plan template shall be designed by each CB and shall contain, at least, the following elements:
 - i. Type of audited organization – farm, group or Chain of Custody Participating Operator;
 - ii. Name of the audited organization;
 - iii. Physical address including city/town and country;
 - iv. Contact person for certification: title, first and last name, telephone and e-mail;
 - v. Type of audit to be conducted: certification, annual, verification, non-programmed or research;
 - vi. SAN/RA standards and policies to be used as reference;
 - vii. Name, status and responsibilities of each member of the audit team;
 - viii. Total number of elements within the audit scope (number of farms, for group administrator; or number of sites, for multi-site participant operator);
- c) The audit shall cover the assessment of the operation's compliance with applicable SAN standard criteria at all times.
- d) The CB shall provide the auditor with sufficient information to prepare for the audit, including the client application, previous audit reports, description of activities related with the processes and the land use in the audited organization, maps and plans where provided, agricultural or veterinary



inputs, declared sales volumes, any use of seal approvals granted, as well as previous cancellations or performance during previous certification cycles.

- e) The CB shall have a procedure to verify estimated volumes and yields on an annual basis, as well as the productivity information following the measurement units requested for each of the products included in the certification scope.
- f) The CB shall include a declaration of whether the farm or group handles or buys products from non-certified farms or groups, or mixes those products in its facilities.
- g) The CB shall provide the auditor with a summary of laws in the certificate holder's country, where available, regarding labor, water, ecosystems, and food production processing standards and safety.
- h) The CB shall provide the auditor with documentation supported by a local organization and research entities regarding crop productivity figures in the certificate holder's country.
- i) For a chain of custody audit, the CB shall request a Chain of Custody report from the Rainforest Alliance Claims, Traceability and Trademarks (CTT) Division (sanracoc@ra.org) no less than two weeks prior to the audit start date, and the date it was requested should be registered in the *SAN Certificate Database (SCD)*.
- j) The duration of an audit is expressed in auditor-days on the site (without including the report preparation and drafting time).

7.4.2 Determination of the member farms sample for group administrators and for multi-site participating operators

- a) The CB shall audit a representative sample of the group administrator's member farms to evaluate the effectiveness of the Internal Management System.
- b) Criteria of the Sustainable Agriculture Standard, according to the audit scope, will be evaluated at the individual farm level for those farms that are members of a group administrator and that are part of the audit sample.
- c) The CB shall always audit at least two member farms in any type of audit.
- d) The composition of member farms to be audited shall be determined in a manner that is representative of all member farms, using stratified random sampling. The following sampling parameters should be considered:
 - i. Farm size and complexity;
 - ii. Differences in production systems and activities;
 - iii. Geographic areas with significant differences in climate, soil conditions or ecosystems;
 - iv. Cultural differences;
 - v. Seasonality: type of work being carried out in the farm at the time of the audit;
 - vi. Length of time a farm has been in the group, or date it was added to it;
 - vii. Member farms that have not been audited previously or recently;
 - viii. Member farms with low scores in previous audits or non-conformities with critical criteria during previous audits;
 - ix. Member farms with permanently hired labor should form part of the sample, especially in groups that consist of both plantations and smallholders;
 - x. Member farms with multiple certificates (from similar certification schemes).
- e) The sites of the Chain of Custody multi-site participating operator (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 company 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.
- f) New sites, products or processes.
- g) In case the CB considers it necessary to increase the sample size, it shall not be more than 1.4 times the square root of the total number of farms. It shall justify and document its decision, based on criteria such as size of the group, lack of continuous improvement, estimated risk or the historical performance of the group administrator and its member farms.
- h) 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.
- i) 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.

7.4.2.1 Certification audit

- a) The size of the sample for certification audits shall always be equal to, at least, the square root of the total number of member farms included in the scope by the group administrator. For Chain of Custody, the sample of sites shall be equal to the square root of the total number of sites that shall be audited.

7.4.2.2 Annual audit

- a) If during the previous audit the score for the group administrator was between 80 and 84.9%, or the lowest score of the audited farms was between 80 and 84.9%, the size of the sample shall be the square root of the total number of member farms.
- b) If during the previous audit the score for the group administrator was between 85 and 89.9%, and the lowest score of the audited farms is between 85 and 89.9%, then the size of the sample shall be 0.75 times the square root of the total number of member farms. If any of those scores is below the specified ranges, then what is indicated in part a) of this section applies.
- c) If during the previous audit the score for the group administrator was 90% or above, and the lowest score of the audited farms was 90% or above, the size of the sample shall be 0.50 times the square root of the total number of member farms.
- d) The CB may increase the size of the sample, based on the provisions of this document.

7.4.2.3 Verification audit

The verification audit checks whether the audited organization has satisfactorily addressed the non-conformities detected during a previous audit that prevented certification.

- a) If during the previous audit only the group administrator did not meet the certification requirements, the verification audit shall only apply to the group administrator.
- b) If during the previous audit non-conformities were only found among the member farms, the size of the sample shall be twice the number of farms that did not meet the certification requirements, up to a maximum equal to the square root of the total number of farms. The farms that did not comply shall be part of the sample.
- c) If during a previous audit both the administrator and the member farms had non-conformities with the certification requirements, both shall be audited. To determine farm sample size, the rules established in this section shall be followed.



- d) For Chain of Custody, 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 Participating Operator.

7.4.2.4 Research audit

An unannounced research audit occurs in response to a claim or complaint about the performance of a certified organization. If the complaint pertains only to the performance of the group administrator regarding the group standard, the research audit shall apply only to it.

- a) If the complaint pertains to the performance of one or more member farms regarding applicable standard documents, the sample shall only consist of the farm(s) included in the complaint. If the CB deems it appropriate, the size of the sample may be expanded up to a maximum equivalent to twice the number of farms included in the complaint.
- b) If the complaint pertains to both the administrator and the member farms, both shall be audited. For Chain of Custody, research audits shall only apply to those sites included in the complaint. To determine farm sample size, the applicable rules established in this section shall be followed.
- c) The CB shall follow the additional guidance on conducting research audits as outlined in section 9 below.

7.4.2.5 Non-programmed audits

A non-programmed audit is conducted as a method of supervision with respect to the certified organization's year round conformance with the applicable standards and policies.

- a) Compliance with all Critical Criteria of the Group Certification Standard shall always be audited in non-programmed audits.
- b) The size of the sample is equal to 0.25 times the square root of the total number of farms in case of groups. For Chain of Custody, the sample size in non-programmed audits shall be equal to 0.25 times the square root of the total number of sites.
- c) The CB shall follow the additional guidance on conducting non-programmed audits as outlined in section 9 below.

7.4.3 Audit scope

- a) The CB shall evaluate compliance of the operation with all applicable criteria of the SAN Standards both at the level of individual farms as well as each of the group administrator's member farms that are part of the audit sample.
- b) In the case of group administrator audits, the CB shall also evaluate the group administrator's compliance with the SAN Group Certification Standard.
- c) In the case of parts of an audited farm that are ceded, leased or handed over for use by third parties, the CB's audit team shall evaluate compliance with all applicable critical criteria of the SAN Sustainable Agriculture Standard.
- d) The CB's audit team shall evaluate the whole area within the farm's limits as described in the *SAN Certification Policy for Farms and Group Administrators*.
- e) The CB shall refer to the *SAN/RA Chain of Custody Policy* to determine the scope for Chain of Custody audits.



7.4.4 Interview planning

- a) For plantation audits, only female auditors should conduct interviews with female workers. In the case a female auditor is not available, the lead auditor may receive assistance from a local female community member. For sensitive issues – such as sexual harassment, discrimination or psychological violence - it is important that there is no male present in the interviews with female workers, and that the interviews take place in confidential settings.
- b) Local language should be used for interviews. In the case of the participation of translators, the independence and confidentiality of translators shall be guaranteed.
- c) The sample of interviewees should be selected based on the stratified random sampling technique and rely on human resource data about the operation's number of employees provided by the operation in the application to the CB. The following sampling parameters should be considered:
 - i. Age;
 - ii. Ethnicity including origin and ethnic group (workers of different origin within the same country, foreigners, indigenous people from different tribes);
 - iii. Gender: women and men – by work function;
 - iv. Employee status: permanent, temporary, part time workers, workers paid by piece rate;
 - v. Hierarchy level: operations, supervision, management;
 - vi. Type of work they perform;
 - vii. Time working for the organization.
- d) The relevant sections of Annex 2 shall apply for regions, crop sectors or operations with high social risk as determined by SAN or the CB.

7.4.5 Conducting Interviews

In order to ensure consistent high-quality audits, the requirements below shall be used by CBs to conduct interviews. These rules are relevant only for farms and groups:

- a) The Lead Auditor should set a minimum number of workers to be interviewed in each audit. This minimum applies to farms and group administrator member farms, both for certification and annual audits. For other type of audits (verification, research and non-programmed) the CB shall have a procedure to establish the minimum number of workers to be interviewed: The Lead Auditor should set a minimum number of workers to be interviewed in each audit. This minimum applies to farms and group administrator member farms, both for certification and annual audits.
- b) The minimum number of workers to be interviewed should be equal to the square root of the total number of workers present in the audited farm at the time the audit is conducted, regardless of their work status (permanent, temporary, part-time, subcontracted). If the resulting number contains decimals, it shall be rounded off to the nearest higher whole number. For plantations with more than 1000 workers, the minimum interviews must be square root of permanent workers + square root of temporary workers + square root of part time workers or subcontracted.
- c) At least once during the audit cycle (three years), audits shall be planned such that the farm is visited at a time when there is the largest presence of workers (permanent, temporary, part time).
- d) If at the time of the audit there is a considerably lower number of workers than expected, then the auditor shall record the justification presented by the auditee.
- e) The interviews may be carried out in groups or individually. In case the organization performs industrial processes, there shall be at least one group interview.
- f) All the interviews are conducted without the presence of the management or supervisors. The auditor shall only continue the interview about sensitive issues if privacy is ensured.



- g) Before the interview starts, the auditor shall introduce herself/himself to the interviewee, clarifying its role on the certified operation and confirming that all interview information is subject to total confidentiality.
- h) The auditor shall apply open questions and active listening as the main techniques to collect evidence from interviews with workers. For the exception of the clause i) below, notes should not be taken during interviews, but rather be made immediately after each interview.
- i) The auditor should record the date, place, and time of the interview, as well as the name and position of each person interviewed.
- j) Interview activity details shall not be revealed to the management representatives at initial or final meetings or in the audit report. The name and identity of all interviewees shall be kept anonymous at all times and at all different versions of the audit reports, including the prohibition of inserting pictures of interviewees or other workers and employees in audit reports.
- k) In the case of non-programmed or research audits focused on the certified operation's compliance with SAN social or labor criteria, at least 70% of the interviews should be conducted with workers.

7.5 Audit Process

7.5.1 General instructions for the audit process

- a) The CB shall provide information to the SAN on audit process milestones according to the *SAN Certificate Database (SCD)* – Engagement section. The audit team must have the right to access and review any documentation related to the applicant or certificate holder's Management System in order to verify information submitted during the application.
- b) The CB shall ensure each in situ audit process is conducted following the guidelines provided in ISO 19011 and be able to demonstrate evaluation of compliance of the client with all relevant SAN/RA standards and policies.
- c) Each audit shall begin with an opening meeting between the audit team and the client's representatives, where the audit plan is summarized, its implementation is discussed in detail, and the responsibilities of each member of the audit team are explained and fine-tuned.
- d) The audit team shall have the right to interview the workers or administrative staff without the presence of their supervisors. If this condition is not met, the lead auditor has the right to terminate the audit process. As consequence, the client shall apply again for a certification audit process.
- e) The audit team shall follow the procedure outlined by the SAN and RA on how to verify volumes produced as outlined in Section 13.
- f) All CBs shall have accredited female auditors on their auditing team. Each CB shall guarantee the formation of mixed teams (women and men) for audits of operations where interviews with female workers need to be conducted.
- g) All force majeure situations which may potentially be exposing one or more members of the audit team, and which could jeopardize their integrity, health or life are recognized as legitimate and valid reasons for a certification body to modify the ideal composition of an audit team. These circumstances may include, but are not limited to risks associated with gender, ethnicity, race, sexual preference, creed or political affiliation of an auditor.
- h) If the audit team is not able to reach a conclusion about an audit finding, it shall document the objective evidence and forward it to the CB for the respective decision. The client shall be informed of this fact, indicating also that the decision of the CB could result in the detection of more non-conformities.
- i) The audit team shall end each audit with a closing meeting with the operation's representatives to summarize the audit results and to discuss findings that merit further analysis before defining a final



conclusion. The CB's lead auditor shall not indicate a final result of the audit during this meeting, since this is the sole responsibility of the CB's Certification Committee.

- j) The audit team shall be comprised of auditors that are knowledgeable in the products and processes of the client.
- k) The CB shall ensure that a group administrator is not adding member farms that used to be part of another group administrator, when said member farms caused the former group administrator's certificate to be denied or cancelled. Only after four months have passed from such certification decision, may these farms be admitted in the new group administrator, provided that they have implemented corrective actions to address the nonconformities that caused the negative certification decision.
- l) In the case of farms and group administrators that handle products from certified and non-certified farms, the CB shall assess compliance with selected criteria of the CoC Standard, following the rules for conformity evaluation of CoC criteria described in Section 8. The CoC standard criteria to be evaluated are: 1.1, 1.2, 1.5, 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 3.1, 3.2 and 3.3. These criteria shall be evaluated in addition to criterion 1.10 of the Sustainable Agriculture Standard and criterion 2.3 of the Group Certification Standard.
- m) Compliance with applicable criteria of the CoC standard shall be assessed at farm level, in the case of individual farms, and at group administrator level in the case of group administrators. All farm's or group administrator's processing and handling products shall be evaluated.
- n) For evaluation of conformity in farms and groups to the applicable criteria of the CoC Standard, the CB shall follow the rules on conformity evaluation that are described in the SAN/RA CoC Certification Policy.

7.6 Audit Records

- a) The lead auditor shall be responsible for documenting any changes in the SAN Application Form information after verifying its information.
- b) The CB shall upload into the *SAN Certificate Database (SCD)* any changes in applicant information documented and submitted by the lead auditor;
- c) Audit records shall include documentation of the evidence examined during the audit that led to conclusions regarding compliance or nonconformity with the relevant criteria of the SAN standards. Audit records should include reports, scoring tools and photographs on evidence of nonconformities. Where possible, workers or employees of operations should not be included in photographs or their names in audit reports.
- d) The lead auditor shall be responsible for submitting to the CB final compliance scores for each of the principles and criteria in the SAN standard using the SAN Audit Scoring Tool.
- e) For farms and group administrators that are required to be audited to the CoC criteria, the report shall include required criteria and audit results.
- f) Data collected by the CB during any audit or certification process may be used by SAN or Rainforest Alliance for reasons related to data quality monitoring, transparency, evaluation and promotion of the program.
- g) The CB shall communicate to the lead auditor of each audit process his/her responsibility of archiving the following documents:
 - i. Signed record of the initial meeting;
 - ii. Signed record of the final meeting, with details of critical criteria findings, if any.
- h) These records shall be kept for a minimum of five years, or longer if required by law. All client and certificate holder records shall be kept up to date. In case the records are kept in more than one location, there shall be a system to identify where each type of document can be found.



If the records are found in more than one location, the CB shall have a system that allows the documents requested by the AB to be obtained within five working days.

- i) The CB shall have a way to document the records and recover data that will enable it to:
 - i. Analyze the CB evaluation by clients to provide information to the management review;
 - ii. File corrective action plans as input for planning of future audits.
 - iii. Provide the SAN secretariat with consistent, accurate and continual data according to these requirements.
- j) All electronic records, including scanned copies of hand-written documents are acceptable, as long as there is a data security and back-up program.
- k) The clients and CB personnel shall have access to the CB's records regarding the client, unless this access is specifically prohibited by law or by reason of certain confidential files.

7.7 Handling of Nonconformities

- a) The CB shall follow the requirements for handling non-conformities as specified in the SAN/RA certification policies.
- b) A lead auditor may eliminate minor or major non-conformities on continuous improvement criteria before the closing meeting of an audit, if evidence is presented by the client before said meeting.
- c) Nonconformities related to continuous improvement criteria may be closed by the auditor prior to report finalization, if evidence showing the nonconformity has been corrected is evaluated within two weeks after the closing meeting. If additional costs are incurred through the evaluation of this evidence, these costs shall be covered by the certified operation.
- d) If a non-conformity against a critical criterion is identified during the audit process, the lead auditor shall communicate it to the client or certificate holder at the time of identification and at the closing meeting.
- e) CBs shall grade Chain of Custody audit nonconformities according to the characteristics defined in table below:

	Major Nonconformity (MNC)	Minor Nonconformity (mnc)
Concept	<ul style="list-style-type: none"> • Evidence of material risk to certified product integrity due to mixing with uncertified product, over-selling of certified volumes, significant system gaps, or grave violations of the use of the trademarks property of Rainforest Alliance. • A nonconformity with criterion 1.3 of the CoC standard that poses a substantial risk to the SAN/Rainforest Alliance CoC system or reflects badly on the name of the SAN and/or Rainforest Alliance, in the sole 	<ul style="list-style-type: none"> • Evidence of nonconformity that does not pose a material risk to certified product integrity due to mixing with uncertified product, over-selling of certified volumes, significant system gaps, or seal use violation. • A nonconformity with criterion 1.3 of the CoC standard that does not pose a substantial risk to the SAN/Rainforest Alliance CoC system or reflect badly on the name of the SAN and/or Rainforest Alliance, in the sole opinion



	Major Nonconformity (MNC)	Minor Nonconformity (mnc)
	opinion of the SAN or Rainforest Alliance, as the case may be.	of the SAN or Rainforest Alliance, as the case may be.
Rule	No MNCs permitted for CoC certification.	<ul style="list-style-type: none"> • A large number of mncs indicate that the overall management system is too weak to issue or maintain the certificate. In such cases, presence of a cumulative impact of multiple mncs indicates risk for a general system breakdown which constitutes a major nonconformance whereby each mnc issued is classified as an MNC
Further characteristics	<ul style="list-style-type: none"> • A systemic fault, not due to an isolated incident. • Affects more than one unit of the PO. • The basis of the system and procedure is not functional. • PO shows intentional indifference regarding mncs, with the same mncs being repeated from the previous year. 	<ul style="list-style-type: none"> • One-time occasion finding, but the respective system elements are in place. • Only affects one unit (e.g., one site within multi-site or one phase such as purchasing, receiving, processing, etc.) but all other units of the PO are performing well.

7.8 Audit Report

- a) All CBs shall ensure that their personnel, including auditors, use the SAN/RA Audit Report for collecting information during farm, groups, cattle and chain of custody audits.
- b) The lead auditor shall write and submit the audit report based on the SAN/RA audit report templates.
- c) The lead auditor shall calculate the score of the audited organization using the SAN Scoring Tool.
- d) The CB shall implement a documented procedure to ensure the quality of all types of audit reports. The report shall be reviewed by at least one person from the CB, with a valid status of lead auditor, who is not the same auditor who originally wrote the report or who participated in the audit. The criteria for evaluating the quality of the reports include, but are not limited to:
 - i. Quality of report contents, including the correct assignment of non-conformities and correct interpretation;
 - ii. Use of correct template;
 - iii. Quality of drafting, including grammar and clear and concise writing;



- iv. Quality and completeness of data, including the integrity of numerical information provided;
 - v. Compliance with submission deadlines.
- e) The CB shall have a list of approved report reviewers and shall conduct a periodic evaluation process to guarantee the quality of the review.
- f) The CB shall comply with the following timeline for the audit report process:
 - i. Auditor shall write the draft report in no more than twenty (20) calendar days from closing meeting.
 - ii. The CB has a maximum of ten (10) calendar days to review the technical aspects and the quality of the information in the audit report.
 - iii. The CB shall send the draft report to the client. The client shall have ten (10) days to review and comment on the draft of the audit report before it is finalized. The auditor shall submit the final audit report no more than ten (10) days after the client's review of the draft report.
- g) The CB shall publish a summary of each audited organization's audit report consisting of the name of certificate holder, country, crop, status information and a list and description of each nonconformity by criteria, as well as the audit team conclusion. This summary shall be published on each accredited CB's website. For Chain of Custody Participating Operators, the CB shall publish:
 - i. Name of the Participating Operator
 - ii. Contact information (physical address, contact person and e-mail)
 - iii. Type of PO (single or multi-site)
 - iv. Type of Company
 - v. Status of the certificate

7.9 Decisions Regarding Certification

- a) The person responsible for making the certification decision shall have the level of Lead Auditor. If a committee is responsible for making the certification decision, it shall have at least one member registered as Lead Auditor with the SAN Secretariat.
- b) The certification decision shall be made no more than ten (10) working days from the time the CB receives the final report from the auditor.
- c) The person or committee responsible for making the certification decision has the right to:
 - i. Eliminate a non-conformity;
 - ii. Change the category of any non-conformity; or
 - iii. Issue a new non-conformity.
- d) The person or committee responsible for making the certification decision shall inform the lead auditor before implementing any of the actions mentioned in subsection c) above.
- e) The CB shall maintain a registry of the occurrence of any of the actions in subsection c) above and document actions taken to correct its cause.
- f) If the person responsible for making the certification decision, while reviewing an audit report, detects opportunities for improvement related to the processes of the CB, s/he shall register the suggestions in the quality management system of the CB.
- g) The CB shall send to the client the documentation regarding the certification decision together with the certificate within a period of five (5) working days from the date when the decision is made, and register the date in the *SAN Certificate Database (SCD)* Engagement section, unless the certification agreement is pending, in which case this time can be extended.
- h) The CB issues a certificate to an organization for a period of 36 months. The certification status is subject to the results of annual audits, research audits and non-programmed audits. The CB may cancel a certificate if the certified organization does not meet one or more of the certification



requirements or if the certified organization's activities conflict with the obligations of the CB as specified in its accreditation contract.

- i) The CB shall upload to the *SAN Certificate Database* the audit report, certificate and audit summary for each audit conducted.
- j) The CB shall have a procedure to communicate with the clients for the renewal of their certificate, taking the following into consideration:
 - i. The original certification date for the client will be maintained for any certificate renewal as long as the renewal is issued no later than 3 months after the expiration date.
 - ii. If the original certification date will be maintained, certification audits for the new cycle shall take place before the previous cycle ends.
 - iii. A certificate corresponding to a new certification cycle has to be issued no later than three months after the previous cycle ended. During this period, the previous certificate will remain active.
 - iv. If a certificate renewal has not been issued three months past the previous certificate's expiration date, the previous certificate will be cancelled.
- k) Only people responsible for certification decisions have the power to authorize changes to the certificate scope and cancellation of certificates. The same applies for the justification of audit delays due to force majeure conditions.
- l) A CB may modify a certification decision only by means of a technical verification of the evidence presented by the client that would require a modification of the decision. See more information in section 12.b subclauses i-iv.
- m) Each organization's certificate shall contain:
 - i. Sustainable Agriculture Network logo according to the Basic Guidelines for Use of the SAN logo;
 - ii. The Rainforest Alliance Certified™ trademarks (in accordance with the "Requirements and Guidelines for Use of the Rainforest Alliance Trademarks");
 - iii. Registered trademark of the CB;
 - iv. The identity and address to contact the CB, together with the description of its accreditation status and its accreditation certificate number;
 - v. The legal name and, if necessary, the commercial name of the certified organization;
 - vi. The location of the certified operation;
 - vii. The product type(s) for the certificate and corresponding volume approved (when applicable); in the case of CoC, it shall include the products and processes approved, as well as the names and locations of all sites within the scope;
 - viii. A statement of conformity and a reference to the names of the SAN/RA standards that were used as reference;
 - ix. The effective date of the certification and its expiration date;
 - x. The unique certificate numbering code generated by the *SAN Certificate Database (SCD)* for the certificate corresponding to each successful certification audit.
- n) Upon receiving notification from a client regarding changes in a certified organization, the CB shall analyze whether such changes substantially increase the risks of not complying with the certification requirements and shall implement the appropriate follow-up actions, when applicable.
- o) The CB shall communicate the below occurrences through adjustments in the *SAN Certificate Database (SCD)* within a period of no more than fifteen (15) calendar days after the decision of the Certification Committee:
 - i. The issuance of the certification regarding the farms, cattle farms, group administrators or Participating Operators.
 - ii. The cancellation and cancellation reason for farms, group administrators or participating operators.



8 Complaints and Appeals Procedures

8.1 Complaints

- a) The procedures of a CB related to complaints shall be documented, available to the public on its website and also made available to workers and other stakeholders. These procedures shall be provided to the SAN upon request.
- b) The CB shall provide stakeholders with a variety of means for stakeholders to file a complaint, including but not limited to: emails, website, phone calls and letters.
- c) The CB shall ensure that it has the capacity to receive and manage complaints in all the official languages of the countries in which it has issued certificates.
- d) The procedures shall ensure that complaints are promptly evaluated. The CB shall confirm the receipt of the complaint to the complainant within ten (10) working days.
- e) When a complaint by a third party is received, (preferably with the name, contact details, objective and detailed evidence of an alleged non conformity with the certification requirements), the CB shall document the complaint and decide on next steps, in accordance with its procedures. These may include, the use of research or non-programmed audits.
- f) The CB shall ensure the confidentiality of the complainant, unless the complainant authorizes it to share the information.
- g) The CB shall not change the certification scope in order to resolve a complaint with respect to the scope of the certification granted.
- h) In a period no longer than ninety (90) days from the receipt of the complaint, the CB shall inform the complainant about the result of its investigation, respecting the confidentiality agreement with the certificate holder. This shall include a summary of the actions taken to address it or the reasons for why it was dismissed. The CB shall also provide the complainant with the contact information for the SAN AB and inform the complainant that it can contact the AB in case it disagrees with the outcomes or the handling of the complaint by the CB.
- i) The CB shall document the complaint and its results and assess if any improvements are necessary to its systems and processes.

8.2 Appeals

- a) The procedures of a CB related to appeals shall be documented, available to the public on its website and provided to client organizations.
- b) The procedures shall ensure that appeals of any CB decision are promptly evaluated. The CB shall confirm the receipt of the appeal to the appellant within ten (10) working days.
- c) The CB shall not resolve appeals by changing the certification scope in order to eliminate a problem in the scope of the certification granted.
- d) Appeals by a certified organization or client shall not change the decision being appealed while the appeal is being processed.
- e) The appeals shall be analyzed by a panel of at least two independent and impartial people who did not participate in the audit or decision-making process related to the certification and one of whom shall have a level of lead auditor for the specific scope.
- f) In a period no longer than ninety (90) days from the receipt of the appeal, the CB shall inform those who filed it about the result of its investigation. The CB shall also provide the appellant with the contact information for the SAN AB and inform it that it can contact the AB in case it disagrees with the outcomes or the handling of the appeal by the CB.



- g) The CB shall document the appeal and its results and assess if any improvements are necessary to its systems.

9 Non-Programmed Audits and Research Audits

In addition to the objectives of conducting research and non-programmed audits described in Section 7, these audits can be used in special circumstances for monitoring the integrity of certification processes.

- a) Conducting research and non-programmed audits is generally a decision for the CB, which shall base its decision on risk analysis of its client portfolio or relevant written justification. However, the SAN may also request these audits.
- b) The CB shall use the audit report template for non-programmed and research audits provided by SAN and upload it to the *SAN Certificate Database*.
- c) Non-programmed audits shall start during the first year of accreditation, based on the number of certificates foreseen to be issued by the certification body by the end of the first year. The number of audited organizations subject to this type of audit, and their selection, shall be determined by the CB and shall be no less than two percent (2%) of the total CB portfolio of certified organizations. The results of these processes shall be documented and become part of the quality system that is reviewed annually by the CB.
- d) The CB shall collaborate in providing information and follow up to SAN and RA as part of their right to investigate any certification or the use of the Rainforest Alliance Certified™ seal by farms and Chain of Custody Participating Operators whose subsidiaries, parent company, stakeholders, or affiliates are involved in actions that may jeopardize the program's integrity and credibility in the sole opinion of the SAN or RA, as the case may be. Such actions include:
 - i. Destruction of high value ecosystems;
 - ii. Violation of human rights;
 - iii. Use of hired child labor;
 - iv. Forced labor;
 - v. Discrimination.
 - vi. Violation of the SAN's policies and procedures, violation of the Rainforest Alliance Certified™ seal use policies and procedures, or making false claims about certified products; and/or
 - vii. Participating in fraudulent or unethical activities;
- e) To this end, SAN and Rainforest Alliance will duly analyze the situation supported by an investigation process with the involvement of the CB and the SAN Secretariat.
- f) The CB may decide to notify the audited organization in advance of a research or non-programmed audit only if doing so is essential to ensuring the presence of key personnel and it does not compromise the results of the audit. In this case, the notice shall be made not more than five (5) working days in advance.



10 Transfer of Certificates in the SAN/RA System

- a) A client may decide to stop being a client of a Certification Body (previous CB) and select another Certification Body (new CB) to conduct the audits. A date of certificate transfer shall be agreed upon by both CBs, or the previous CB needs to agree to maintain the certificate until the new CB completes the transfer process.
- b) A client may not have two certificates in force for the same scope at the same time. It is not necessary that the new CB conduct an audit before the transfer, if the client is still within the allowed audit times.
- c) The current client's certificate will remain active at the time of transfer, and its issue date is not modified. The only change that is made by SAN is the name of the CB for the certificate and the certificate code.
- d) When a client decides to transfer its certification, the client must notify the previous CB in writing. The new CB must review the client's profile in advance of the transfer and before accepting the transfer request. This review must include:
 - i. Confirmation that the certificate is in force and valid for the scope described.
 - ii. Identification of the reason for the transfer.
 - iii. Confirmation that the certification scope corresponds to the accreditation scope of the new CB.
 - iv. Confirmation that any complaint submitted has been resolved.
 - v. Review of the client's audit history (where the provider can verify this history to the satisfaction of the new CB, based on copies of audit reports completed by the previous certifier) and the nature of any pending nonconformity.
 - vi. Confirmation by the previous CB that no pending debts related to certification exist.
 - vii. Confirmation of the current stage of the audit cycle
- e) The new CB may request the previous CB provide copies of audit reports, scoring lists, pending non conformities and similar documents. The previous CB must provide these documents subject to written approval of the client that is making the transfer.
- f) If the new CB is not sure that the information provided by the client is complete or correct, or if the reasons for the change are for the purpose of avoiding action on nonconformities, then the request for transfer will not be accepted
- g) The clients whose certificates have been canceled, and that want a transfer to a new CB, can request it only if the new CB conducts a certification audit which addresses the reasons for the cancellation by the previous CB.
- h) In the case of disagreement between two CBs involved in certificate transfer of a client, the CBs may ask the SAN secretariat for interpretation of the respective clause of these requirements. The SAN secretariat can back up its decision with the Accreditation Body, if necessary.
- i) When the transfer process is finalized, the new CB shall request a transfer of the certificate in the *SAN Certificate Database (SCD)*, and upload the letter sent by the client requesting the transfer, as well as the email communication between the new CB and the previous CB where the transfer is agreed upon.
- j) When the transfer is complete in the *SAN Certificate Database (SCD)*, the new CB shall issue a physical certificate with the new certificate code and information about the new CB, while maintaining the same scope and dates of the previous certificate.

11 Use of Seals, Marks and Logos



- a) For using the SAN logo the CB shall refer to the guidelines detailed in the “SAN logo basic guidelines” document published in the SANbox, the SAN’s online tool for CBs.
- b) In referring the SAN name or its work, the CB shall refer to the guidelines detailed in the “SAN image and messaging guidelines for CBs” document published in the SANbox.
- c) The CB shall refer to the “Requirements and Guidelines for Use of the Rainforest Alliance Trademarks” published on the Rainforest Alliance website.
- d) The CB shall adhere to the clauses in the Pre-Accreditation Agreement related to the use of SAN and Rainforest Alliance seals, marks and logos. Farms, group administrators and participating operators shall adhere to the Rainforest Alliance licensing agreements and the trademarks and traceability guidelines.

12 Validating Agriculture Claims

- a) Data Entry Process: The CB shall ensure that its certification data entry process includes the following:
 - i. The Sales Contact for the certified operation, as provided in the SAN Application Form, is included and entered into the *SAN Certificate Database (SCD)*. The CB is responsible for updating the sales contact information at the request of the certificate holder in the *SAN Certificate Database (SCD)*. If a certified operation does not include a sales contact then by default the sales contact will be the contact person for certification as indicated on the application.
 - ii. Estimated volumes are entered in the *SAN Certificate Database (SCD)* for the next annual period. This allows the certificate holder to continue to make sales claims and use the seal during any gaps between annual certified periods. If no estimated volumes are entered into the *SAN Certificate Database (SCD)*, sales cannot be validated.
- b) Preventing overselling of products from certified operations: The CB shall have a system in place to validate volumes sold:
 - i. The CB shall assess whether to approve any request received from a client to change or modify the approved volume of a certificate after it has been approved by the certification committee. The CB should verify the reason for the change in volume indicating if it is due to a volume extension/modification or volume correction (this is when the lead auditor or the person responsible for entering data mistakenly recorded the information in SAN Certificate Database (SCD)).
 - ii. If the expansion of the volume is due to a request received from a client, the CB shall check the % increase in volume. If the increase is less than 10% of the approved volume it is not necessary to perform a technical verification process, but the CB shall record the reason the client indicates this increase and the new volume in the SAN Certificate Database (SCD).
 - iii. If the expansion of the volume requested by the client is between 10% - 25% more than the approved amount, the CB shall conduct a technical verification focused on the confirmation of the reasons that led to the increase in volume. If the CB verifies that the increase is justified, the new volume approved shall be recorded in the SAN Certificate Database (SCD) and attach the audit report.



- iv. If the expansion of the volume requested by the client is above the 25% of the approved volume, the CB must conduct a verification audit focused on the reasons that led to the increase in volume. If the CB verifies that the increase is justified, the new volume approved shall be recorded in the SAN Certificate Database (SCD) and the verification audit report shall also be attached.
- v. Identify if certificate holders are using inaccurate or false information about claims for products purchased and/or sold.
- vi. Review product stocks and make sure that the volume validation processes during the audit differentiates between product stock and product to be harvested during the annual period, therefore making sure that the approved volume for that annual period is the volume to be harvested only* (*Note: this is so that stocked volume is not included in the annual volume approved as this would then result in double counting of the same product volume);
- vii. Know how to evaluate how input products, both for individual farmers making up a group or Participating Operators, are received such that certificate holders have a system in place to ensure that products received come from certified farms or sources.
 - 1. In the case that the certificate holder has earned certifications from other certification programs, the CB must ensure that the auditor knows how to check volume balances for both RA certified and non-RA-certified products and to evaluate the certificate holder's system for volume balances.
 - 2. The CB must ensure that the auditor reviews the certificate holder's system for keeping balances of what has been sold as RA and non-RA per farm or site.
 - 3. The CB must ensure that auditors evaluate the certificate holder's system to make sure that product that has been replaced or purchased as non-certified is not claimed as from a Rainforest Alliance farm or source when sold; this should include that the certificate holder has a system in place to implement sanctions (to the farmer or site) when they find product inputs claiming to be from a certified source or farm which are not.
 - 4. The CB must ensure that the auditor validates the production volume during the audit, which was provided by the certificate holder in their application.
- c) Communication with certificate holders regarding certified product sales:
 - i. The CB shall inform the certificate holder that once their certificate has been approved and its status is active in the *SAN Certificate Database (SCD)*, they can submit a request for approval of use of the seal and sell the related product volumes as certified;
 - ii. CBs shall inform certificate holders at the time of the termination of the certificate that they have no more than 6 months to sell off the remaining volume of product. If the remaining volume is sold off prior to the end of the sell off period then at that time no more sale validations will be issued and they can no longer make claims for these products. This period starts with the certificate cancellation date or end date.

13 Guidelines for Validating Agriculture Claims in Force Majeure Conditions

The following guidelines for validating agriculture claims apply in the event that an audit cannot take place due to *force majeure* conditions. These conditions are defined in the *SAN Terms and Definitions*.



- a) In the case of force majeure conditions, the certified organization must contact the CB no less than 30 days prior to the annual certificate end date.
- b) The CB shall request the volume to be harvested in the current period from the certified organization. Upon confirming this volume, it cannot be modified.
- c) The CB shall confirm that this shall be the volume assigned to the certificate's annual period upon being able to conduct the annual audit. This volume is assigned using the estimated volume field in the *SAN Certificate Database (SCD)*.
- d) The CB shall inform the producer that no additional volume from the producer will be allowed to be sold than is registered as the estimated volume for that annual period.

14 Actions for Identifying Violations of Traceability Processes

- a) If the Rainforest Alliance Certified™ seal appears on any products or marketing materials, the auditor shall verify that the client has a current and valid License Agreement signed with the Rainforest Alliance.
- b) If an auditor detects the use of the seal on a product that does not originate from a certified organization or any other unapproved use of the Rainforest Alliance Certified™ seal, the CB shall document them in the *SAN Certificate Database (SCD)*.
- c) The CB shall use the sales reports provided by Rainforest Alliance to verify any possible violations or fraudulent activity related to the sale of approved product volumes.
- d) If a CB decides to cancel a certification based on fraudulent traceability or selling activities, the CB shall document the suspected activity in the *SAN Certificate Database (SCD)* and confirm with Rainforest Alliance related sales information prior to issuing the cancellation.



ANNEX 2: Additional Social Auditing Methods for High Risk Regions, Crop Sectors and Operations

The following social methods should be considered by all Certification Bodies to be applied for social high-risk operations, crop sectors, countries or regions. Additionally, the SAN has defined specific crops and countries or regions, where these methods are binding for SAN audits. The methods include elements on:

1. Audit planning
2. Selecting a representative sample of interviewees
3. Conducting the interview
4. Reviewing the management system

1. Audit planning

- a) All SAN registered lead auditors shall have passed the “SAN 2014 social auditing training course“, to be considered authorized to lead audits in social high-risk areas as determined by SAN.
- b) Any audit team of a CB accredited by SAN for any social high-risk region, crop sector or operation shall include at minimum one female auditor and should consider the inclusion of a social science expert.
 - i. Only in justified cases where CB logistics cannot include a female auditor in said audit team - male auditors with proven experience to conduct interviews with women can form part of audit teams.
 - ii. Only female auditors shall be authorized by the CB to conduct interviews with women about gender discrimination, psychological or physical violence, including sexual harassment topics.
- c) Audit plans for each client shall be adjusted to each specific situation:
 - i. Each audit plan shall be adapted to the processes and working environment of the organization subject to an audit, and provide for sufficient time to cover the organization's social management system, shifts and production scenarios.
 - ii. During one certification cycle, at least one audit shall be planned covering harvest periods and one audit covering non-harvest periods. Other high risk periods for compliance with SAN labor criteria should be additionally considered by the certification body when planning for audits.
 - iii. Audit plans shall include the following information, as a minimum:
 1. Auditors' Names - Experts' Names, Translators' Names, other persons' names observing the audit, if applicable.
 2. Client contact details including the organization's name; address; main contact; management representative; workers representative; other representatives such as health and safety, gender or discrimination committee representatives; Human Resource manager; payroll supervisor.
 3. Shifts operated and to be audited.
 4. Locations to be audited.
 5. Approximate time of each audit activity per day, including travel time to sites.
 6. Audit site demographics related to number, gender and language spoken for: workers, supervisors and managers, and contract services suppliers.
 7. Indication of the expected number of worker and manager interviews *according to the Section 7.4.5 for this requirements.*



8. Statement on the obligation for senior management and workers representatives to be present at the opening and closing meetings.
- iv. Local language should be used for interviews, including the consideration of tribal dialects. In the case of the use of a translator, its independence shall be guaranteed and they shall be trained by the CB about the audit process.

2. Selecting a representative sample of interviewees

- a) The audit team should dedicate at minimum 50% of the audit time on interviews with workers. Individual interviews can be followed by additional group interviews to confirm evidence of possible non-conformities.
- b) The sample of interviewees shall be selected based on the stratified random sampling technique relying on human resource data about the operation's number of employees provided by the operation in the application to the CB.
- c) The following sampling parameters should be considered that can detect vulnerable groups when defining the sample of interviewees for social topic interviews in high risk regions:
 - i. Age;
 - ii. Ethnicity including origin and ethnic group (workers of different origin within the same country, foreigners, indigenous people from different tribes);
 - iii. Gender: women and men – by work function;
 - iv. Employee status: permanent, temporary, part time workers, workers paid by piece rate;
 - v. Hierarchy level: operations, supervision, management;
 - vi. Type of work they perform;
 - vii. Time working for the organization;
 - viii. For the risk scenario of sexual harassment, women who are pregnant, divorced, separated, or widowed shall be included in the interview sample, as well as young and single women, casual workers, informal workers and migrant workers or workers infected with HIV.
 - ix. To complete the audit investigation about gender discrimination, violence and sexual harassment, also on-site subcontractors and suppliers, such as cleaners, canteen staff, construction crews, clinic nurses and doctors, dormitory and security guards, as well as transport service providers should be interviewed.

3. Conducting the Interview

The following requirements shall be implemented for an audit team's interviewing process:

- a) Interviews shall be only conducted without the presence of supervisors and managers.
- b) For sensitive issues, no male worker or auditor shall be present during interviews with women. Non-sensitive issues can be dealt with the presence of male auditors.
- c) All interviews with workers about sensitive labor issues shall only be conducted in a confidential setting: without any supervision or management personnel present and outside the plantation or in a closed room on the plantation.
- d) Before starting an interview, the auditor shall introduce herself/himself to the interviewee, clarify her/his role with the certified operation and confirm that all interview information is subject to total confidentiality.
- e) Notes should not be taken during these interviews but be made immediately after each interview.



- f) Open questions shall be the main interviewing technique to collect evidence from workers. Active Listening should also be implemented to inspire trust and make the worker feel valued.
- g) Examples of sexual harassment are:
 - i. Physical conduct
 - 1. Physical violence
 - 2. Physical contact, e.g. touching, pinching
 - 3. The use of job-related threats or rewards to solicit sexual favors
 - ii. Verbal conduct
 - 1. Comments on a worker's appearance
 - 2. Sexual comments, stories and jokes
 - 3. Sexual advances
 - 4. Repeated social invitations
 - 5. Insults based on the sex of the worker
 - 6. Condescending or paternalistic remarks
 - iii. Non-verbal conduct
 - 1. Display of sexually explicit or suggestive material
 - 2. Sexually-suggestive gestures
 - 3. Whistling
- h) Once having established an atmosphere of confidence with the interviewed woman, the following topics serve as guidance for the interview:
 - i. Has anyone hit, slapped, kicked, or done anything else to hurt you physically?
 - ii. Does/did anyone on the plantation ever:
 - 1. Push you, shake you, or throw something at you?
 - 2. Slap you?
 - 3. Twist your arm or pull your hair?
 - 4. Punch you with his fist or with something that could hurt you?
 - 5. Kick you or drag you or beat you up?
 - 6. Try to choke you or burn you?
 - 7. Threaten or attack you with a knife, gun, or any other weapon?
 - 8. Physically force you to have sexual intercourse?
 - 9. Force you to perform any sexual acts?
 - iii. Emotional violence - Does/Did anyone on the plantation ever:
 - 1. Say or do something to humiliate you in front of others?
 - 2. Threaten to hurt or harm you or someone close to you?
 - 3. Insult you or make you feel bad about yourself?
 - iv. Has any supervisor asked you for bribes in interchange of maintaining or improving your working conditions?
- i) The schedule of women shall be analyzed also as part of the investigation. Women are usually working harder than men as they have to fulfill their obligations as mothers also.
- j) The auditor shall only continue the interview, if privacy is ensured. If privacy is not ensured, the interviewer should thank the interviewee, and end the interview.
 - i. Clause 7.6.1 of this requirements is mandatory for SAN accredited certification body audit processes, *and, if applicable, the client must apply again for a certification audit process.*
- k) The auditor shall record the date, place, time and duration of the interview, as well as the name and position of each person interviewed.
- l) The auditor/s shall not reveal any interview activity details to the management representatives at initial or final meetings or during the audit process, in general.



- m) The identity of interviewees shall be kept anonymous at all times, including the prohibition of inserting pictures of interviewees or other workers and employees in presentations of an audit's final meeting.

4. Reviewing the management system

- a) The audit team shall assess the following structure and hierarchy aspects of a plantation's management system as evidence about compliance with SAN July 2010 Sustainable Agriculture Standard's criteria 1.1, 1.2, 1.3, 1.4, 1.5, 1.7, 1.9, 5.1 and principle 5, in general:
 - i. Map and analyze the workflows for each production site to identify jobs and corresponding responsibility with possible focal points of abuse.
 - ii. The existence of casualization as a possible precursor to predispose workers to act desperately to gain or keep their employment, including sexual advance or bribery.
 - iii. Publishing and communication to all employees and workers of strongly worded policy statements:
 - 1. Organizational policy on an abuse free work place;
 - 2. Policy for the empowerment of women in different levels of the organization, including equal opportunities when appointing lower and upper management positions.
 - iv. Existence and effective implementation of a grievance (a complaints procedure which is both effective and simple to use) and follow up mechanisms for reporting and addressing abuses and or other labor rights violations.
 - v. Existence of a written system of progressive discipline.
 - vi. Existence of a well-trained, balanced and empowered gender committee.
 - vii. Frequent training for all workers targeted particularly at staff that plays a specific role in the complaints procedure.
 - viii. Monitoring and regular evaluation of sexual harassment complaints procedures.
 - ix. No use of any form of, or threat of, monetary fines and penalties as a means to maintain labor discipline, including for poor performance or for violating company rules, regulations, and policies.
 - x. Access to food, water, toilets, canteens, medical care or health clinics or other basic necessities is not used as either reward or as a means to maintain labor discipline.
 - xi. The plantation does not use any form of, or threat of, physical violence, including slaps, pushes or any other forms of physical contact as a means to maintain labor discipline.
 - xii. No use of any form of verbal violence, including screaming, yelling, or the use of threatening, demeaning, or insulting language, as a means to maintain labor discipline.
- b) Auditors should attend the meetings of trade unions or other committees; or training events.