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**Sustainable Rice Platform**

**Chain of Custody (CoC) Standard**

Version 1.0

August 2020

www.sustainablerice.org

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SRP Chain of Custody (CoC) Standard v 1.0

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This document has been prepared by a Sustainable Rice Platform (SRP) expert group led by Control Union and NEPCon, supported by the SRP Task Force on Chain of Custody following extensive consultation with SRP members and external stakeholders, with key contributions by GLOBALG.A.P.

**Disclaimer**

The views expressed in this document are those of the authors and may not in any circumstance be regarded as representing an official position of the organizations involved.

**About the Sustainable Rice Platform (SRP)**

SRP is a global multi‐stakeholder alliance launched in 2011 and led by UN Environment, IRRI, and GIZ, comprising over 100 institutional stakeholders, including public and private sector stakeholders, research, financial institutions and NGOs. SRP promotes resource‐use efficiency and climate change resilience in rice systems (both on‐farm and throughout value chains) and pursues voluntary market transformation initiatives by developing sustainable production standards, indicators, incentive mechanisms, and outreach mechanisms to boost wide‐scale adoption of sustainable best practices throughout rice value chains. SRP’s goal is to minimize environmental impacts of rice production and consumption while enhancing smallholder incomes and contributing to food security.

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# GLOSSARY

**Assurance Scheme**: scheme providing verified assurance of conformance to a normative standard.

**Assurance Service Provider (ASP)**: organization mandated by SRP to operate the SRP Assurance Scheme. GLOBALG.A.P. serves as SRP’s only ASP.

**Certification Body (CB)**: Independent organization ISO 17065 accredited and recognized by an accrediting body for its competence to audit and issue certification confirming that an organization meets the requirements of the SRP standard.

**Claim Category**: the type and claim being tracked within the COC control system. Where the Organisation’s COC system is Identity Preservation, the claim category will include both the SRP verification status of the rice and the farmer or producer group from where the rice has been sourced. In instances where the Organisation’s COC system is Segregation, the claim category will include SRP-verified rice.

**Consignment**: quantity (e.g. batch, lot, load) of product mass with attached data specifying the product content in terms of kilograms and sustainability characteristics.

**Conversion Factors**: are the ratio between the output material and the input material. Conversion factors will be specific to facilities and should be accurately documented in the mass balance system.

**Data Collector**: responsible for collecting registration and self‐assessment data from producers and uploading to the SRP database. A data collector may be a farm assurer, a research institute, company, extension worker, project owner, group manager or miller.

**Document**: information and its supporting medium. The medium can be paper, electronic, photograph or a combination.

**Finished product**: a finished product is a product where no further modification occurs (including repacking).

**Identity Preservation (IP) System**: is a type of COC model which assures that the SRP-verified rice products delivered to the end user is uniquely identifiable to its verified supply base, it consist the details of farmer or producer group.

**Inventory Period**: a consistent period over which physical SRP certified rice and sustainability data is reconciled. Unallocated sustainability data may be carried over to the next inventory period following mass balance rules.

**Multiple sites**: a group of sites that have a contractual link, a defined Central Office and a minimum of two participating sites. Such sites may be food processors, etc., brought together under a Central Office and administered using an Internal Control System (ICS). Central Offices that also physically handle and/or process SRP certified rice or sustainable data are counted as both Central Office and a participating site.

**Outsourcing**: subcontracted manufacturing or other handling services of materials/products by a separate entity.

**Participating Operator**: individual, company or organization which has ownership and/or control of rice and/or all rice derived products, from their origin to their market availability, for one or several steps in the supply chain.

**Producers**: individuals or entities legally responsible for production of the rice sold by those individuals or businesses and who are eligible to apply for SRP evaluation under the Scheme.

**Reporting Period**: this will be one year, starting from certification date, unless otherwise agreed.

**Segregation System**: is a type of COC model which assures that the SRP-verified rice products delivered to the end user come only from SRP-verified sources.

**Site**: a site is defined as a geographical location with precise boundaries within which products can be mixed

**SRP Secretariat**: responsible for managing SRP’s activities and programmes under the strategic oversight of the SRP Executive Board.

**Supplier**: previous legal owner of the product in the Chain of Custody.

**Sustainability characteristics**: sustainability characteristics refer to whether or not a consignment of paddy, milled rice and any other rice by product, comply partly or fully with SRP environmental, social and economic criteria. When residues and waste are produced, in addition to the main product, sustainability characteristics shall equally apply to all.

**Traceability**: the ability to verify the history, location, or application of an item by means of documented recorded identification.

**Verification Code**: a unique code awarded to an organisation which has certified or verified part or all of its products according to a certification scheme.

# INTRODUCTION

# Background

* + 1. The Sustainable Rice Platform (SRP) is a global multi‐stakeholder alliance with over 100 institutional members led by United Nations Environment Programme (UNEP) and the International Rice Research Institute (IRRI), together with partners from the public and private sectors, research, nonprofit organizations and the international development community.
    2. Established in 2011, the SRP aims to secure adoption of sustainable farming practices among at least 1 million rice farmers by 2023. In 2015 the SRP launched the world’s first global Standard for Sustainable Rice Production, providing a working definition of sustainability in any rice system and allows sustainability scoring at farm level. In addition, a linked set of SRP Performance Indicators (PI) enables collection of farm data to quantify and verify improvements and impacts.
    3. The SRP Chain of Custody is based on the SRP Standard and Performance Indicators in order to underpin verifiable sustainability claims for rice produced using proven, climate‐smart sustainable best practices.
    4. The SRP Chain of Custody is based on the outcomes of field pilots including test audits conducted by SRP members in a number of rice‐growing countries. SRP has authorized GLOBALG.A.P. to manage the Scheme as SRP’s authorized Assurance Service Provider (ASP).
    5. The Chain of Custody was developed in line with ISEAL Guidelines by the SRP Working Group on Standards, Assurance and Impact, as mandated by the SRP’s Advisory Committee. The Working Group convened in February 2017 with representatives from Control Union, Ebro Foods, GIZ, GLOBALG.A.P., IRRI, NEPCon, Mars Food, PRIME Agri, Rikolto, Syngenta, UNEP, UTZ, VSR Rice, WCS Cambodia, Winrock and WWF Pakistan. A workshop in May 2017 brought Working Group members together to discuss the broad framework and scope of the Scheme, including rules and processes for accreditation of verification/certification bodies, auditor qualifications and group internal control systems. A first draft of the assurance framework was shared with external stakeholders for review.
    6. Following the recommendations of a SRP Strategic Visioning Workshop in May 2018 the focus of the Assurance Scheme shifted from certification to verification, ultimately resulting in the removal of the certification level from scope (although this might be made available in future revisions according to demand). Nevertheless, based on a CoC Task Force discussion in June 2020, it was agreed that SRP Chain of Custody system should take a certification approach.
    7. GLOBALG.A.P. provided further technical specification for the Assurance Scheme in 2019, with an updated draft published for a 30‐day online public consultation on 23 March to 22 April 2020. Over 200 comments were received from Control Union, Foodtech Solutions, NEPCon and Oxfam;, and all comments and responses were documented and are publicly accessible via the SRP website. The SRP Executive Board endorsed the SRP Assurance Scheme Version 1.3 in June 2020.
    8. SRP recognizes three different types of Chain of Custody models: Identity Preservation (IP), Product Segregation (Seg) and Mass Balance (MB). Chain of Custody certification is required for on-product use of SRP claims and SRP-Verified Label.
    9. Unless otherwise stated, all aspects of this Standard are considered to be normative, including the scope, Standard effective date, references, Glossary, requirements, notes, tables and annexes.

# Scope and Effective Date

* + 1. The Chain of Custody (CoC) Standard is the core standard that specifies requirements for all Chain of Custody-verified and applicant Organisations with respect to sourcing, processing, labelling, and sale of rice-based products as SRP-verified.
    2. All Organisations in the supply chain from farmer to final packaging of products with SRP claim shall be covered by a SRP COC certification system, managed by an approved SRP certification body. CoC certification shall cover all relevant activities conducted by the certified Operation (purchasing, processing, storage, marking, record-keeping etc.) to ensure segregation of SRP-verified rice from non-verified rice. Certified Operations implementing Mass Balance system shall comply with additional specific requirements for Mass Balance as set out in Annex 3.
    3. This standard applies to any Participating Operator purchasing, handling and/or trading SRP verified rice. It describes the requirements to ensure the traceability of SRP verified rice by implementing a Chain of Custody system varying from Identity Preservation (IP) to Segregation (Seg) to Mass Balance (MB).
    4. This Standard is effective from the date of approval as stated in this document. The Standard will be updated periodically, and updated versions will replace previous versions.

# Participants in the Audit Process

* + 1. The CB shall be comprised by a team of experts for specific areas to complete the certification process and comply with these Rules in accordance with each team member´s role. An individual can play the role of different participants. All CB personnel involved shall have signed a confidentiality agreement.
    2. A designated Certification Body staff member will be responsible for administration of the certification program. His/her responsibilities are to:

1. Ensure and supervise that all CB staff meet the qualifications described in this document and other relevant documentation.
2. Ensure that auditors conduct the audits in accordance with all requirements specified in this document.
3. Update and communicate with CB staff and certificate holders about changes in the certification program.
4. Provide documentation and/or reports to SRP on request.
5. Ensure timely and adequate follow-up communications with SRP.
6. Inform SRP when there are changes that may affect CB compliance with the requirements stipulated in this document, as well as cases where the CB receives a sanction by any other scheme for which the CB is approved, e.g. RA SAS COC, FSC COC, PEFC COC, RSPO SCC.
   * 1. A database administrator within the CB manages the account within the Certification Database and ensures proper data input. His/her responsibilities are to:
7. Input data on certification processes for certificate holders, ensuring each step follows the certification process timeline rules.
8. Ensure data quality and update certificate holder information as needed. Data quality includes accurate certificate information, as well as consistency of information across the various fields and attachments in the Certification Database.
9. Update auditor records in the Certification Database with new training, performance evaluations and general auditor details.
10. Participate in Certification Database training and webinars.
11. Follow-up on specific data input needs or record updates in timely manner.
    * 1. The auditor team is made up of qualified and registered auditors, one of whom acts as CoC auditor, and any additional technical experts as needed. All must pass the SRP training course, qualified as lead CoC auditor according to a social/environmental assurance scheme with similar CoC requirements i.e. RA SAS COC, FSC COC, PEFC COC, RSPO SCC. The teams’ responsibilities are to:
12. Audit according to the system’s requirements.
13. Ensure compliance with the audit report requirements of the certification process timeline.
14. Provide accurate information about all aspects of the audit process.
15. Respond to requests by the database administrator based on requests by the SRP monitoring process.
    * 1. Quality Reviewer: The CB staff member responsible for reviewing audit reports to ensure proper interpretation of the SRP CoC Standard (Annex 2) must:
16. Conduct a quality review of the audit reports and ensure that accurate and consistent information is recorded in the Certification Database. For example, the quality reviewer should ensure that list of sites is recorded accurately in the audit report and in the engagement record.
17. Notify the audit team of any inaccuracies in the non-conformities evaluated in the audit report.
18. Propose improvements to the Certification Manager in the certification process for the audit quality review and auditor competence.
19. Make the final certification decision.
20. Have the authority to modify the recommendation of the audit team, due to any errors or inconsistencies identified in the audit report.
21. Request that the CoC auditors clarify or expand any section from the audit report.
22. Dismiss a nonconformity.
23. Issue a new nonconformity.
24. Review an appeal based on a certification decision.

# COC CERTIFICATION RULES

# Chain of Custody Audit Scope

* + 1. The SRP Chain of Custody requirements shall apply to any organisation in the supply chain that takes legal ownership and physically handles SRP RSPO Certified Rice products at a location under the control of the organisation including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.
    2. Any company, association, factory, processing unit or other entity that applies for SRP Chain of Custody certification named as Participating Operator (PO).
    3. POs can be divided into two categories for the purposes of SRP CoC system:

1. Single Participating Operator: An entity that administers only one production and/or processing facility but may administer one or more offices. The CoC certificate is issued for a single PO.
2. Multi-site Participating Operator: An entity that administers two or more sites.
   * 1. In cases where Participating Operator outsources activities to independent third parties, a risk assessment shall be done by the CB to determine whether an audit of the Outsourced contractors is required. If the Outsourced contractor holds SRP CoC certification, then it does not require a risk assessment.
     2. Outsourced contractors shall be considered high risk if physically transforming products or if there is a risk of uncontrolled, non-deliberate or accidental cross-contamination resulting in mixing of certified and non-certified products. In such case the Outsourced contractors should be included as in the audit scope, a field visit to Outsourced contractors shall be planned.
     3. Expansion of multi-site Participating Operator certificate:
3. At any time in the audit cycle, a PO may request a change to the certification scope in order to increase or decrease the number of sites.
4. In order for a multi-site PO to increase its number of sites, it shall communicate to the CB for each site it wishes to include.
5. Any new facilities involved in manufacturing, packaging and labelling shall be approved by the certification body before included under the scope of the certificate. This may require onsite audit from certification body or just a desk review, depend on complexity and risk of the site that added into the certificate scope.

# Type of Audit and Frequency

* + 1. The CB shall record each audit process for the different type of audits in the SRP Database at the time the operation confirms the audit date.
    2. Onsite audit is required for organizations involved in manufacturing, packaging, labelling SRP rice. Desk audits can be used for traders not involved in any transformation or repackaging.
    3. Certification audit: A certification audit is carried out when the organization applies for SRP certification for the first time, and then every three years.

1. The CB shall complete the next certification audit process before the certificate expires.
2. If the CB does not have a new certification audit process activated when the certificate expires, the certificate will be cancelled automatically in the SRP Database.
   * 1. Annual audit: The CB shall conduct an annual audit according to the risk of the PO. They may be on-site or desk depending on risk of the PO. On-site annual audit shall be conducted if PO physically transforming products or if there is a risk of uncontrolled, non-deliberate or accidental cross-contamination resulting in mixing of certified and non-certified products, and a desk annual audit can be conducted if PO does not physically possess SRP product.
3. Annual audits shall take place between three months before and three months after the anniversary date of the certificate.
4. Annual audits shall evaluate all applicable criteria and corrective actions of open minor non-conformities from the previous audit.
   * 1. Verification audit, CB shall conduct a verification audit when the organization receives one or more major non-conformities as a result of an annual or certification audit. When a verification audit is necessary, the CBs shall adhere to the following additional timeline:
5. For closure of all major non-conformities the verification audit shall be completed and a final certification decision made within four months after having received the previous certification decision.
6. A new report checklist shall be used by the auditor which includes only the required elements related to verification on all major non-conformities.
   * 1. Research audits: The CB may conduct research audits in response to a claim or complaint from a buyer or third party regarding a PO with the potential to result in a major nonconformity. They may be conducted at any time in the certification cycle, with the following conditions:
7. If the complaint only pertains to the performance of the multi-site administrator regarding the multi-site standard requirements, the Research audit shall apply only to it.
8. If the complaint pertains to the performance of one or more-member sites regarding applicable standard documents, the sample shall only include the sites included in the complaint. If the complaint pertains to both the administrator and the member sites, both shall be audited.
9. In the checklist, the CB must only record the criteria on which the research audit was focused.
10. Where a research audit is required, the PO will cover the costs of these audits.

# Conformance Evaluation

* + 1. Audit findings are classified as conformities or non-conformities. Non-conformities can be categorised as Major or minor.
    2. Non-conformities may be closed by the auditor prior to report finalization, if evidence showing the non-conformity has been corrected is evaluated within two weeks after the closing meeting. Any additional costs incurred in evaluating such evidence shall be borne by the PO.
    3. An observation is a comment intended to highlight potential improvements to the PO’s CoC system.
    4. A major nonconformity (MNC) is issued when there is:

1. Evidence of nonconformity that poses 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.
2. A non-conformity of the CoC standard set out in Annex 2 that poses a substantial risk to SRP CoC system or reflects badly on the name of the SRP, in the sole opinion of the SRP, as the case may be.
3. Upgrading of a minor non-conformity that was not closed within the designated timeline.
   * 1. If one or more MNCs are issued as a result of a certification audit, CoC certification will not be approved, and PO shall undergo a verification audit within four months of the certification decision. If during the verification audit the PO demonstrates corrective actions sufficient to close the MNCs, a certificate may be issued. Otherwise, CoC certification will not be approved.
     2. If one or more MNCs are issued as a result of an annual audit, CoC certification may be suspended, the PO shall undergo a verification audit within four months of the certification decision. If during the verification audit, the PO demonstrates corrective actions sufficient to close the MNCs, the certificate may be reinstated. Otherwise, the certificate will be terminated.
     3. A minor nonconformity (mnc) is issued when there is:
4. 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.
5. A nonconformity of the CoC standard set out in Annex 2 that does not pose a substantial risk to the SRP CoC system or reflect badly on the name of the SRP.
   * 1. Although mnc generally does not prevent certificate issuance or maintenance, there may be cases when 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 non-conformance whereby each mnc issued is classified as an MNC.
     2. If any open mnc(s) remain following the certification or annual audits, the PO should demonstrate corrective actions sufficient to resolve each mnc within 12 months of the certification decision.
     3. At any audit, a CB may, but is not required to, upgrade a mnc from a previous audit to a MNC if the PO has not demonstrated corrective actions sufficient to resolve the mnc. In addition, at a certification audit, a CB shall upgrade any open mnc(s) to MNC(s) if the PO has not demonstrated corrective actions sufficient to resolve the open mnc(s) issued during the previous certification cycle.

# Certificate Termination and Sanction

* + 1. A PO’s CoC certificate be terminated shall be subject to sanctions for any of the following reasons:

1. The PO does not undergo the corresponding audits in the certification cycle within the established timeframes, unless the CB authorises an extension based on a force majeure situation.
2. A PO is found to make false claims or declarations, or to deliberately provide inaccurate information.
3. A PO deliberately obstructs or hinders an audit.
4. A PO has participated in fraudulent or unethical activities that may tarnish the reputation of the certification program.
5. A PO fails to comply with any aspect of the SRP CoC system.
6. A system breakdown or major/critical non-conformance that have resulted in or likely will result in non-eligible products being sold with SRP claim shall result in suspension.
   * 1. The PO may also request voluntary termination of its certificate from the CB, in which case a certification deemed “terminated” as of the date of the PO’s written request.
     2. Sanctions for a PO without CoC status shall include all of the applicable consequences of termination:
7. As of the cancellation date, no further sale or transfer of ownership of certified rice may be claimed or recognised as SRP Certified. Should the PO have additional volumes of SRP Certified rice it wishes to sell, PO shall confirm a sell-off period to GlobalG.A.P. through the system and the volume has verified and approved as SRP products. The sell-off period begins on the termination date and continues for up to 6 months from the termination date.
8. As of the termination date, and including during the sell-off period, the PO will immediately cease to make any off-pack claims that imply that it complies with the CoC standard and policies and immediately cease to make use of SRP claims or trademarks in any physical or electronic promotional material or media, in brochures or on web pages, signs or other type of documentation (other than approved annual reports or sustainability reports dated for years prior to termination).
9. As of the termination date, and including during the sell-off period, a PO may not create or cause to be created any new products, packaging or off-product promotional materials marked as SRP Certified.
10. Following termination, and accounting for the sell-off period, the PO shall be deactivated in all applicable SRP systems.
11. A PO with terminated certificate due to fraud cannot be recertified within a period of 1 year from the date of the termination.
    * 1. If a certificate is suspended for more than 4 months, it shall be terminated.

# Certificate Reinstatement

* + 1. POs whose certificate has been terminated may re-apply for the certificate at any time unless the termination due to fraud, it shall follow the requirement in section 2.4.3 e).
    2. POs who have no CoC status and have been sanctioned by SRP shall obtain compliance with SRP licensing agreements and the requirements for the trademarks and traceability system prior to selling and/or promoting products as originating from SRP Certified farms.
    3. The certificate cycle will follow the reactivation date.
    4. Unless within the previously approved sell-off period, no product may be sold with SRP Certified claims before a new CoC certificate is issued or sanctions have been lifted.
    5. In order to be reactivated, a PO shall:

1. Submit a new application to CB determine the corresponding assurance tasks to be undertaken.
2. Close any existing MNCs or mncs that were open in the 12 months prior to termination and were not closed when the previous certificate was terminated.
3. Certificates can be re-activated after onsite audit resulting in a positive decision.

# Certification Process Timeline Rules

* + 1. The CB is responsible for complying with the maximum timelines defined and recording the process in the SRP Database within the applicable milestone dates (for details of the timelines, see the Annex 1)
    2. This timeline can be extended if the certification is not granted:

1. From the certification decision date, the CB has 4 months to perform a verification audit and have a new certification decision within this period.
2. From the appeals date the CB has 30 business days to review the appeal.

# Multi-site Sample Planning

* + 1. The CB shall audit a representative sample of the PO’s member sites to evaluate the effectiveness of the Internal Management System.
    2. Criteria of the SRP Chain of Custody Standard, according to the audit scope, will be evaluated at the site level for those sites that are part of the audit sample.
    3. The CB shall always audit at least two-member sites in any type of audit.
    4. The sites of the Chain of Custody multi-site PO to be evaluated by the audit team shall be selected in such a way that represents the risk categories for each site. When selecting sites for audit, the following factors shall be considered:

1. Geographic distribution;
2. Activities and/or products produced;
3. Size and complexity of participating sites;
4. Areas of improvement of the management system identified by internal reports or external audits.
5. New sites, products or processes
   * 1. The CB shall use the following guidance to determine the sample size for each audit type. If the value of the sample size is not an integer number, the CB shall round it up to the next higher number.

|  |  |
| --- | --- |
| **Type of Audit** | **Sample size** |
| Certification audit | The sample of sites to be audited shall be equal to the square root of the total number of sites in the certificate. |
| Annual audit | The sample of sites to be audited shall be equal to the square root of the total  number of sites in the certificate. |
| Verification audit | The verification audit checks whether the audited organization has satisfactorily addressed the non-conformities detected during a previous audit. Verification audits shall only apply to those sites that did not meet the certification requirements. A verification audit could also be used to add new sites with potential high risk. |
| Research audit | A research audit occurs in response to a claim or complaint about the performance of a certified organization. Research audits shall only apply to those sites included in the complaint. |

# CB Permitted Support

* + 1. The actions described in this section are permitted by SRP but are not required. CBs shall consult SRP if they have any questions or need more information about technical support during or related to certification processes. CBs shall also consult GlobalG.A.P. as the Assurance Service Provider if they have any questions or need more information about potential conflicts with ISO requirements.
    2. The CB may support the PO by doing following:

1. Describe examples of compliance with standard criteria.
2. Mention to the operation that there is the option of hiring a consultant or organization to help the PO to prepare for the audit and certification process.
3. Provide sample documentation or other supporting materials to the PO that show how a fictional company has met CoC requirements.
4. Describe a nonconformity during the closing meeting and in the audit report in such a way that the non-compliance and its cause are very clear, so that the operation knows exactly what it needs to correct.
5. Providing general training about the CoC Standard and the requirements applicable to different types of operations, including standard interpretation by auditors for these types of operations. This training must be open to several operations.

# CB Support not Permitted

* + 1. Recommend specific actions or products for complying with the applicable CoC Standard, including providing corrective actions, designs for operations-specific infrastructure, or write or participate in writing required plans, policies or procedures;
    2. Give advice or directions, prescribe practices, or provide instructions to close non-conformities. CBs may, however, explain in detail the reasons that led to opening the non-conformities.
    3. Provide support or consulting services that could affect their impartiality in assigning non-conformities, evaluating corrective actions and making certification decisions;
    4. Combine or package offers or quotes for technical support with certification services;
    5. Mix support and certification activities in any way that violates any of the requirements stipulated in the SRP Assurance Scheme.

# COC CERTIFICATION PROCESS

# Application Process

* + 1. The SRP Chain of Custody process start with a new certification process, it begins when PO sends the application form to the CB. CB will determine the audit type, budget and duration.
    2. The CB shall send a welcome package that includes the SRP CoC Standard and Application form with the applicable procedures.
    3. Within 10 business days of receipt of the application, CB shall review to ensure the following are in line with CB understanding of the PO:

1. All sites handling/purchasing SRP Certified rice have been included
2. The company operation and activities are accurate
   * 1. The CB shall ensure that the PO's record in the SRP Database is updated based on any changes to the PO’s information or certification scope.
     2. The multi-site member list must be uploaded at the time of report finalization each year, when changes occur.

# Audit Plan Development

* + 1. CBs shall provide POs with an audit plan at least 5 days in advance of the on-site or desk audit process, with the exception of research audits. The objective of the audit plan is to describe all activities for the audit process which includes the following aspects:

1. The composition of the audit team, indicating names and roles of the auditors and experts who will participate in the audit
2. The date that the audit will occur including the time required to perform the audit
3. PO information that impacts the audit process:
4. Single or Multi-site - Number of sites
5. Product information and related process
6. Documents and records to be available for the audit process
7. Agenda for the audit
   * 1. Factors to consider when planning audits:
8. To prepare for the audit the CB shall review the following factors to be evaluated and recorded, including but not limited to:
9. Geographic location of the operation – address, state, country;
10. Type of operation;
11. Number of Sites;
12. Valid certifications under other schemes;
13. For operations that are already certified, the performance history of the operation regarding compliance with the SRP CoC Standard;
14. For research audits, CBs shall base their audit preparation and review on existing information about the operation to be investigated, which should include the above-mentioned factors. CBs shall consider:
15. The nature and seriousness of the complaint or incident reported or detected;
16. The evidence presented and compiled to date.

# Audit Execution

* + 1. Preliminary review of documentation, CBs shall provide the audit teams with access to all the necessary information to conduct the audit for their thorough review before initiating the audit, which can include information from other sources or stakeholders.
    2. Opening Meeting, the audit team shall initiate each on-site audit with an opening meeting conducted by the CoC auditor in the presence of all audit team members that are assigned to audit the site at which the main opening meeting occurs and representatives of the audited operation. The audit team shall record the names of the meeting’s attendees, and agreements made and any objections or concerns of the operation’s representatives.
    3. CBs shall provide clear and concise evidence to document conformance and non- conformance during the audit. The audit teams shall verify findings between different types of evidence “triangulating” the document reviews, interviews, and observations of operations. Whenever possible the audit teams shall record it and use it as a basis to expand the audit scope or the collection of evidence.
    4. Individual auditors shall keep notes of evidence for the CoC Standard criteria that they audit. The audit team can complete an audit checklist provided by the CB with a summary of the consolidated evidence from the team members for each CoC Standard criterion. The summary should clearly describe the reasons why the operation has conformance or not in conformance with the CoC Standard criteria, and the extent or magnitude of any non-conformance.
    5. Audit teams shall record all non-conformities and consolidated evidence in the Audit report to ensure that all 2015 CoC Standard criteria were audited and to facilitate the recounting of evidence during the closing meeting.
    6. The CoC auditor conducts the closing meeting of the audit. The audit team participates according to the instructions of the CoC auditor. The audit team shall ensure that the following functions and activities are completed during the closing meeting:

1. Explain the rest of the certification process and its timeline, and emphasize that the audit team does not make the certification decision;
2. Describe the main findings and the conclusions of the audit so that they are clearly understood by the operation, especially the nature and extent of non-conformities;
3. Auditors shall clearly explain the audited organization each non-conformity and they may explain the reasons that led to opening the non-conformities;
4. CBs should allow the representatives of the operation to question findings and submit evidence that could lead to modifications of conformity decisions within the time limits established by the CB;
5. Allow questions from the operation regarding potential improvements and corrective actions;
6. Obtain documentation related to compliance with the CoC standard and verify any remaining information about the operation;
7. Reiterate the commitment to confidentiality and limitations on the use of the information obtained.
   * 1. CoC auditors shall submit the completed checklists, verified information, and all other materials describing or containing compliance evidence to the CB. CBs shall maintain copies of this evidence in their files.

# Audit Report and Review

* + 1. CBs shall adhere to the timelines highlighted in Annex 1 related to report review and finalization.
    2. After the steps are completed as highlighted in Annex 1 the CB takes the certification decision and completes the process in the SRP Database.
    3. SRP can require shorter deadlines in cases of research audits for high risk cases. SRP shall communicate shorter deadlines to the CBs carrying out the research audit during the audit planning process.
    4. For multi-site PO certificates, the CoC auditor is responsible for completing information in the checklist with verified sample details describing corresponding findings and evidence for each member site and at the multi-site administrator level.
    5. For verification audits, the authors should reference the original audit report and complete the full review of non-conformance criteria and indicate the additional information and the date of the verification audit. For new audit samples, the CoC auditor should complete evidence and findings for all criteria.
    6. The CoC auditor shall send the CB the audit report, list of updated member sites and any evidence obtained during the audit.

# Certification Decision

* + 1. CBs shall implement a documented review of the quality of all audit reports. CB assigns a quality reviewer and sends the draft audit report and additional evidence provided by the audit team.
    2. The quality reviewer shall consider the following elements according to the requirements of the SRP assurance system:

1. Correct interpretation of the SRP CoC Standard criteria for the applicable audit scope;
2. Assignment of non-conformities to the correct SRP CoC Standard criteria;
3. Verify that the evidence for all criteria and all non-conformities is described in a manner that is clear, concise, objective and expresses the nature, magnitude and correct technical basis of the non-conformities in relation to the standard;
4. Verify that the conclusions of the report are consistent with the non-conformities reported;
5. Correct spelling and grammar without excessive use of jargon or colloquialisms;
6. Compliance with submission deadlines established in this document.
   * 1. The quality reviewer shall document recommended changes and any comments, observations and suggestions for improvement and send them to the CoC auditors.
     2. The reviewer shall evaluate the quality of the report and keep a record for each audit report including aspects to be improved, which will be used for the auditor performance evaluated by the CB and SRP.
     3. CBs shall maintain copies of the original draft audit report and the quality review teams’ reports and incorporate them into quality assurance reviews as indicated in the CBs’ quality management systems.
     4. The CoC auditor shall modify audit reports based on the comments, observations and suggestions indicated in the quality review. Any conflicts between the audit teams or CoC auditors’ findings and the recommended changes must be documented and incorporated in the CB’s quality management system for eventual reviews.

# Client Review and Appeals

* + 1. PDF versions of audit reports shall be generated after the quality review process and sent to audited operations for their review and comment. The following responsibilities and rights govern these processes:

1. CBs shall have a process that documents and responds to operations’ comments about or conflicts with audit reports submitted for their review;
2. Audited operations shall review the information about their operations and notify CBs of any discrepancies or inaccuracies;
3. Audited operations shall report to CBs any discrepancies or conflicts with respect to the non-conformities reported in the closing meetings and those described in the audit report. Operations have the right to challenge any new or modified compliance issues recommended by report reviewers or review committees, and to provide evidence to support their claims;
4. CBs shall receive and process any comment, complaint or conflict related to audit reports according to their documented processes.
   * 1. CBs can consider the audit reports accepted when the operation does not communicate any comments or concerns within 10 business days. In this case, and when the operation rejects the decisions regarding the content of the reports despite clear technical justifications by CBs, CBs shall proceed with the certification decision, send the final report to the audited operation, and upload it into the Certification Database.
     2. Audited operations can appeal the certification decisions of CBs according to the SRP CoC Certification Policy, and the procedures established by CBs. CBs must adhere to the following requirements and timeframe in their appeals procedures:
5. The appeal shall be analyzed by an individual who did not participate in the audit or in the decision-making process related to the certification, who does not have any conflicts of interest related to the operation, and who shall have a level of CoC auditor;
6. The CB shall not resolve appeals by changing the certificate scope in order to eliminate a problem in the scope of the certification granted;
7. CBs shall resolve and communicate the result of any appeal within 30 business days;
8. CBs shall indicate in their appeal procedure any associated fees;
9. CBs shall maintain records of appeal processes that include the dates that appeals are received, decided, and communicated to audited operations, as well as the nature of the appeal and the decision made. These records shall be made available to SRP upon request;
10. Only in the case where the audited operation is not satisfied with the result of the appeal process with the CB, the CBs shall communicate that they may appeal to SRP within five business days of the original appeal decision. The SRP appeal process will adhere to the same scope and requirements as described in this section. All decisions by SRP are final;
11. The CB shall inform the operation the result of its appeal process. If an operation’s appeal is accepted, the CB shall modify the original audit report to reflect the new certification decision and upload the new report into the SRP Database. If the appeal is not accepted, the decision prior appeal shall be applied.

# Issuing the Certificate

* + 1. CBs shall issue certificates only after operations have successfully passed certification audits or have successfully passed verification audits after failing certification audits. CBs shall also issue updated certificates for:

1. Operations that have undergone additional audits that necessitate changes in the certificate;
2. Operations that have changed their legal or commercial name.
   * 1. All certificates have a validity of 36 months from the date of the certification decision. When operations undergo verification audits after their first certification audit, the certification decision date corresponds to the decision date for the verification audit.
     2. The status of the certification is subject to the results of subsequent audits and operation compliance with the SRP rules and related requirements.
     3. The certificates issued by CBs shall include the following:
3. The legal name and, if necessary, the trade name of the certified organization;
4. The location of the certified operation;
5. A statement of conformity and the names of the SRP standards that were used as a reference;
6. The effective date of the certification and its expiration date;
7. List of sites included in certificate with company type
8. Type of product sold
9. The unique certificate code number is generated by the SRP Database, corresponding to each successful certification audit.

# Annex 1 Certification Process Timeline Rules

**CB reviews CoC application within 10 business days after receiving CoC application**

**CB sends audit plan to the PO 5 at least 5 business days before start of audits**

**CB conducts CoC audit**

**Auditor prepares draft report and document supporting evidence**

**Quality reviewer reviews draft audit report within 10 business days**

**The PO reviews and approve draft audit report 5 business days**

**CB creates final report and makes certification decision no later than 2 months from date of completion of fieldwork**

# Annex 2: Sustainable Rice Platform COC Standard

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| 1. **General COC requirements** | | |
| Criterion 1.1 The Participating Operator must implement the Chain of Custody requirements within the scope identified | | |
| **Indicator** | | **Guidance** |
| 1.1.1 | The Participating Operator must identify the scope of the Chain of Custody system. |  |
| 1.1.2 | The Participating Operator must define the unit of certification, including, in the case of multi-site operators, number of sites and the type of operations covered by the scope of their SRP CoC. When applying the Mass Balance system, a Participating Operator must implement the mass balance requirements set out in Annex 3 at the level of a single site. Whenever more than one legal entity operates on a site, each legal entity is required to operate its own mass balance. |  |
| 1.1.3 | The Participating Operator must ensure that independent third parties that handling SRP products (e.g. subcontracts for storage, transport, etc.) in conformance with the COC Standard requirements |  |
| 1.1.4 | The Participating Operator must have an agreement with its sites requiring appropriate reporting and communication. |  |
| 1.1.5 | The Participating Operator shall define and document the claim category/ies that will be tracked within the COC control system. |  |
| Criterion 1.2 The Participating Operator has a system in place to implement the CoC requirements | | |
| **Indicator** | | **Guidance** |
| 1.2.1 | The Participating Operator shall define one person with overall responsibility for the COC control system, and individual persons responsible for each part of the COC control system including but not limited to purchasing and receiving, processing, storage and shipping, marking, delivery and sale, record-keeping. |  |
| 1.2.2 | The Participating Operator shall develop and maintain documented procedures to ensure conformance with all applicable COC requirements. The procedures must be according to the scale and complexity of the economic operator, covering all sites included in the scope. |  |
| 1.2.3 | The Participating Operator must retain and report information related to implementation of the SRP CoC standard, including purchase and sales documents, production records and volume summaries for at least **three (3)** years. |  |
| 1.2.4 | The Participating Operator must undertake an annual internal review of performance, including the effectiveness of quality management systems and the compliance of the sites with the requirements of the SRP CoC standard. In case of problems, the Participating Operator must take appropriate corrective actions. |  |
| 1.2.5 | All workers involved in the implementation of this CoC are aware and have sufficient knowledge of the SRP COC requirements. |  |
| 1.2.6 | The Participating Operator shall maintain data on the quantity of tracked product and ensure that the data are made available to certification body. At minimum, the quantitative information that shall be maintained relating to each reporting period is as follows:   * purchased SRP-verified rice * SRP-verified rice used in processing * waste produced during processing * sold SRP-verified rice * input and final SRP-verified rice held in stock |  |

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| 1. **Chain of Custody Models** | | |
| Criterion 2.1 The Participating Operator must define the CoC Models and develop system supporting the CoC models | | |
| **Indicator** | | **Guidance** |
| 2.1.1 | The Participating Operator that applies Identity Preservation (IP) system shall demonstrate segregation starting from the level of farmer or group of farmers up to point of sale. |  |
| 2.1.2 | The Participating Operator that applies Segregation System shall demonstrate segregation of SRP-verified rice and non-verified rice within its operation sites. |  |
| 2.1.3 | The Participating Operator that applies Mass Balance shall demonstrate the system is in place and in conformance with the Mass Balance requirements set out in the Assurance Scheme. |  |
| 2.1.4 | The Participating Operator shall track and segregate SRP-verified rice with separate claim categories throughout all processes, including purchasing and receiving, processing, storage and shipping, marking, delivery and sale. |  |

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| 1. **Data Validation** | | |
| Criterion 3.1 The Participating Operator must validate the SRP documentation | | |
| **Indicator** | | **Guidance** |
| 3.1.1 | The Participating Operator must check the supplier contract, invoice and supporting documentation to ensure the supplied SRP verified rice comes from SRP verified suppliers, matches the accompanying documentation and includes all information required in Annex 4. |  |
| 3.1.2 | For each purchase/ receipt of SRP-verified rice tracked within the COC control system, the Participating Operator shall identify, validate and record at least the following information:   * identification of supplier(s) * identification of SRP-verified claim * quantity of delivery * date of delivery * claim category * the supplier’s SRP Verification Code[[1]](#footnote-1), as applicable. |  |

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| 1. **Data Reconciliation** | | |
| Criterion 4.1 The Participating Operator must record and manage the SRP documentation | | |
| **Indicator** | | **Guidance** |
| 4.1.1 | Invoice and/or supporting documentation of incoming SRP verified rice must be received and entered into the system within 30 days of physical delivery. |  |
| 4.1.2 | Where applicable, the Participating Operator must use documented conversion rates in order to calculate the equivalent output weight or volume associated with the received SRP consignment. |  |
| 4.1.3 | The Participating Operator must maintain the accuracy of any measuring equipment used. | *Verification and calibration of the equipment. This should be done at a certain frequency (for example every 6 months)* |
| 4.1.4 | The volume of SRP verified rice received and the associated sustainability characteristics must be recorded in the system, within30 days of entering the system, after validity has been confirmed (indicator 2.1.1) |  |
| 4.1.5 | Allocation of SRP data must only be to products which are fungible with rice products. |  |
| 4.1.6 | The Participating Operator must undertake inventories of the input/output balance of SRP verified rice at fixed regular intervals, for each operation site, not exceeding 30 days. |  |
| 4.1.7 | The volume of SRP verified rice received shall be greater or equal to the volume or quantity of SRP verified rice supplied to clients over a fixed inventory period of maximum 30 days. |  |
| 4.1.8 | Where the balance of inputs and outputs is positive at the end of the economic operator’s inventory period sustainability data may be carried into the next inventory period. |  |
| 4.1.9 | Sustainability data expires 3years from the date of entry into the system or until the end of certification of the economic operator, whichever occurs sooner. |  |

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| 1. **Processing** | | |
| Criterion 5.1 The Participating Operator shall implement CoC system within its processing activities | | |
| **Indicator** | | **Guidance** |
| 5.1.1 | The Participating Operator shall use a tracking system or production records to document the processing of product for each claim category. |  |
| 5.1.2 | The Participating Operator shall ensure that any off-site processing or handling that takes place at a contracted facility follows the same COC procedures as implemented by the Participating Operator and is covered by a signed outsourcing agreement required in 1.1.4, requiring conformance with the applicable requirements of this Standard. |  |
| 5.1.3 | All product that cannot be identified as belonging to one of the claim categories defined in 4.1 above, shall be kept separate from all other products until documented evidence of the claim category is obtained. |  |

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| 1. **Shipping and sales** | | |
| Criterion 6.1 The Participating Operator shall ensure the SRP certified rice sold with a correct information in the sales documents | | |
| **Indicator** | | **Guidance** |
| 6.1.1 | The Participating Operator shall ensure claim information is provided on sales invoices and shipping documents, including the following:   * Description of the product and the claim category, * Quantity of each product/ claim category, * SRP Verification Code, if applicable. |  |

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| 1. **Claims and public information** | | |
| Criterion 7.1 The Participating Operator shall ensure the SRP certified rice sold with a correct information in the sales documents | | |
| **Indicator** | | **Guidance** |
| 7.1.1 | The Participating Operator shall sign a license agreement directly with SRP prior to using any SRP claims or Label. |  |
| 7.1.2 | All claims and references to SRP made by the Participating Operator shall be in conformance with SRP Trademark Rules, as applicable. |  |
| 7.1.3 | The Participating Operator shall submit all claims or on-product Label to SRP/CBs/GlobalG.A.P. for review and approval prior to use. |  |

# Annex 3 Mass Balance Requirements

The Participating Operator that applies Mass Balance shall demonstrate the system and in conformance with the relevant provisions of the SRP Assurance Scheme and the following additional requirements:

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| 1. **Traceability** |
| 1.1 All sales and shipment transactions of mass balance materials or products claimed as SRP rice must be reported through SRP online system. As a minimum, all sales conducted during a calendar quarter must be registered within 30 days of the end of that quarter. |
| 1.2 Mass balance credits are valid for a maximum of three years. If sales exceed purchases, these must be covered with sufficient purchases of certified inputs by the end of the quarter in order to make Transaction for that quarter. |
| 1.3 When using mass balance, transaction for purchases of the SRP rice should reflect the content recipe of the packaging. For example, if the SRP rice is 30 percent, the transaction document should be purchased for these rice is in the same proportions. |
| 1. **Double Counting for Multi-Certified Materials** |
| 2.1 If a batch of SRP rice is purchased from a farm that has more than one sustainability scheme (e.g. Organic), then the equivalent volume of material can be sold forward with both certifications attached to the batch. However, the two certifications may not be separated and applied to two separate batches of material, each equivalent in volume to the original purchase, as this would be considered double accounting. Volumes entered in SRP Database as SRP and sold under an alternative scheme must be recorded in SRP Database “Sold as non SRP.” |
| 1. **Conversion Ratio** |
| 3.1 If a user wishes to convert mass balance credits to allow them to be used for further processed materials then they must demonstrate the conversion ratios. It is not possible for credits to be converted backwards or in any other manner inconsistent with actual processing conversions. |
| 1. **Time Bound Plan** |
| 4.1 The PO should develop a time bound plan to move the mass balance system into IP or Segregation system. The time bound plan should be available during the CoC audit as part of the CoC evidence. |
| 1. **Communication and Claims** |
| 5.1 POs implementing Mass Balance system are not permitted to use on-pack SRP-Verified Label. |
| 5.2 On-pack claims should comply with SRP Permitted Communications and Claims/Logo/Label Guidelines as set out in Annex 7 of the SRP Assurance Scheme v 1.3 and the SRP Brand Manual 2020 (both available at www.sustainablerice.org). |

# Annex 4 SRP Data Validation of Supplier

1. *SRP Global Number from SRP database.* [↑](#footnote-ref-1)