

# Sustainable Rice Platform Assurance Scheme



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This document has been prepared by the Sustainable Rice Platform (SRP).

#### **Disclaimer**

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

The Sustainable Rice Platform e.V. (SRP) is a global multi-stakeholder alliance comprising over 100 institutional members from public, private, research, civil society and the financial sector. Coconvened by the International Rice Research Institute (IRRI), the United Nations Environment Programme (UNEP) and private sector partners. SRP works with its members and partners to transform the global rice sector by improving smallholder livelihoods, reducing the social, environmental and climate footprint of rice production, and by offering the global rice market an assured supply of sustainably produced rice.

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#### 1. ABBREVIATIONS AND DEFINITIONS

#### 1.1. Abbreviations

**CAB** Conformity Assessment Body

CAP Corrective Action Plan
FO Farmer Organization
GMR Group Member Registry
KPI Key Performance Indicator
IMS Internal Management System

ISEAL Global membership organization for credible sustainability standards

NC Non-conformity or Non-compliance

**OFI** Opportunity for Improvement

PHU Product Handling Unit
PI Performance Indicators
RCA Root Cause Analysis
SRP Sustainable Rice Platform

#### 1.2. Definitions<sup>1</sup>

**Appeal:** Request by the client to the CAB or by the CAB to SRP for reconsideration of their assessment or approval decision. Also, by a group member regarding their membership of a producer group.

**Approval:** The process of evaluation and approval of a CAB by SRP to carry out third-party assessment and verification activity.

**Approved:** Of a CAB, permitted by SRP to carry out third-party assessment and verification activity.

**Assessment\***: A systematic and careful process that results in a judgement of a producer, producer group or a CAB. As this term has wide application, the following specific types of assessment are defined:

**Third-party Assessment:** The combined processes - by an approved CAB that is independent of the producer or producer group - of audit, review and decision on a producer's or producer group's compliance with the requirements of a standard.

**Internal assessment:** Assessment of compliance with the SRP Standard for Sustainable Rice Cultivation which peers, members of an IMS Team or an appointed external party (other than an approved CAB) conducts on behalf of the producer.

<sup>&</sup>lt;sup>1</sup> A Definitions marked <sup>\*</sup> are adapted from the ISEAL Assurance Code of Good Practice v 2.01, available at <a href="https://www.isealalliance.org/get-involved/resources/iseal-assurance-code-good-practice-version-20">https://www.isealalliance.org/get-involved/resources/iseal-assurance-code-good-practice-version-20</a>.



**Self-assessment:** Assessment of compliance with the SRP Internal Management System Standard which the producer or producer group conducts themself to evaluate the performance and effectiveness of their IMS.

**CAB Assessment:** Processes carried out by SRP to determine a CAB's conformance with requirements for CAB approval.

**CAB Self-assessment:** A CAB's process to determine if all competency, resource, and other requirements are fully met as part of the requirements to gain CAB Approval.

**Assurance\*:** Demonstrable evidence that specified requirements relating to a product, process, system, person or body are fulfilled.

**Audit\*:** A systematic, documented process for obtaining records, statements of fact or other relevant information and assessing them objectively to determine the extent to which specified requirements are fulfilled.

**Auditor\*:** Person who performs the audit.

**Chain of Custody:** The custodial sequence that occurs as ownership or control of the material supply is transferred from one custodian to another in the supply chain.

**Claim\*:** A message used to set apart and promote a product, process, business or service with reference to one or more of the pillars of sustainability: social, economic and/or environmental.

**Client\***: The person or enterprise that is seeking assurance of a producer's or producer group's conformity with the requirements of a standard.

**Conformity Assessment Body:** An entity that can issue a third-party statement that fulfilment of specified requirements has been demonstrated.

**Compliance audit:** An audit that is carried out by a party independent of the CAB that caried out a preceding audit, to assess the quality of that preceding audit.

**Complaint\*:** Expression of dissatisfaction, other than appeal, by any person or organization to a standard/ scheme owner or CAB relating to their respective activities, where a response is expected.

**Data Collector:** Person responsible for collecting the registration data and internal assessments from producers or producer groups. A data collector may be a farm



assurer, a research institute, company, extension worker, project owner, group manager or miller.

**Data Governance\*:** The overall management of the availability, usability, integrity, and security of the data gathered and used by an organization. A data governance program includes a governing mechanism, a defined set of procedures, and a plan to execute those procedures.

**Farmer Organization:** Formal or registered membership-based collective action institution serving its members.

**Integrity audit:** An audit carried out by SRP as part of oversight of assurance. These may be 'compliance' or 'witness' audits.

**Internal Audit\*:** An internal, systematic, documented process, conducted on themselves by a producer, producer group or CAB, for obtaining relevant information and assessing objectively to determine the extent to which specified requirements are fulfilled.

**Internal Management System (IMS)\*:** The documented set of procedures and processes, as set out in the SRP IMS Standard that a producer group or producer with multiple farms/plots must implement to ensure it can achieve its specified requirements.

**License and Registration Agreement (LRA)**: an agreement between SRP and approved CAB which outlines the terms and condition under which the SRP licenses certain rights and registers the CAB under the SRP Assurance Scheme.

**Logos:** Both SRP-Verified Label and SRP Organizational Logo.

'Label' refers to the SRP-Verified Label indicating the integrity of claims to sustainable best practices according to the SRP Standard, as verified through the SRP Assurance Scheme. The SRP-Verified Label symbolizes a seal of approval.

'Logo' refers to the SRP Organization Logo, used to uphold SRP's brand value and recognition and to ensure consistent application across all SRP programs, tools and communication materials.

**Non-compliance\*** (synonym: non-conformity): An identified occurrence of non-conformance with one requirement of a standard, i.e. a missed threshold, identified as part of an assessment.

Off-taker: Party who buys the product being produced.



**Oversight:** The processes of ensuring that assurance is conducted efficiently and credibly. This includes reviewing audit reports, conducting integrity audits, reviewing and calibrating CAB performance, overseeing remediation of CAB NCs, and applying sanctions as necessary, as well as ensuring competence and qualifications of personnel.

**Plot:** A small production area within a farm.

**Producer (synonym: farmer):** The legally responsible individual or business in terms of practices, processes and sales of rice under the scope of verification.

**Producer Group:** formed by individuals or businesses, either as a legal entity or informally. If legally structured may be known as a 'Farmer Organization'. Such groups may include rice production communities, cooperatives, farmer organizations or millers with contract farmers.

**Risk\*:** The chance of something happening that will have an impact on objectives. It is measured in terms of a combination of the probability of an event and the severity of its consequences.

**Risk Register\***: Document containing the results of risk analyses and risk response planning. The risk register details significant threats, potentially including description, category, cause, probability of occurring, impact(s) on objectives, proposed mitigations, owners, and current status.

**Standard Owner (synonym: Scheme Owner)**: In this case the Sustainable Rice Platform e.V. (SRP) owns the SRP Standard as well as the SRP Assurance Scheme.

**Sublicense and Registration Agreement (SRA)**: an agreement between approved CAB and the producer/ producer group or participating operator which outlines the terms and condition under which the CAB sublicenses certain rights and registers the producer/ producer group or participating operator under the SRP Assurance Scheme.

**Verification:** Issuance of a statement that fulfilment of specified compliance requirements has been demonstrated, following a process of third-party assessment.

**Witness audit:** An audit that is observed by a party independent of the CAB to assess the quality and integrity of the CAB's audit.



#### 2. INTRODUCTION

# 2.1. Background

- 2.1.1. The Sustainable Rice Platform (SRP) is a global multi-stakeholder alliance with over 100 institutional members led by UN 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.
- 2.1.2. Established in 2011, SRP aims to secure wide-scale adoption of sustainable farming practices among rice farmers around the world. In 2015 the SRP launched the world's first global Standard for Sustainable Rice Cultivation, which provides 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 (PIs) enable collection of farm data to quantify and verify improvements and impacts.
- 2.1.3. The SRP Assurance Scheme is based on the SRP Standard and PIs in order to underpin verifiable sustainability claims for rice produced using proven, climate-smart sustainable best practices. The SRP Assurance Scheme is intended to provide demonstrable evidence of conformity with the SRP Standard for Sustainable Rice Cultivation and enable the use of SRP trademarks (Claims, Labels) upon achieving assurance. Assurance for the SRP Chain of Custody System is dealt with separately. Refer to Resources SRP (sustainablerice.org).
- 2.1.4. The SRP Assurance Scheme focuses on verification, is built on strong internal assessment and provides registration and internal assessment as a starting point. Internal and self-assessment is also available as a performance and improvement tool for those who are not proceeding immediately to third-party assessment.
- 2.1.5. Stakeholders are welcome to contact SRP for clarification of any aspects of the SRP Assurance Scheme.

#### 2.2. Scope

- 2.2.1. This SRP Assurance Scheme applies to all assurance activity related to the SRP Standard for Sustainable Rice Cultivation and the SRP Internal Management System Standards, from January 1, 2024, and preparation for that activity. It supersedes and replaces Assurance Scheme 1.3 which ceases to apply from the same date.
- 2.2.2. This document defines:
  - **Responsibilities** within the SRP Assurance Scheme including oversight of assurance.
  - Requirements for producers, producer groups and those engaged in assessing and reporting compliance or



- demonstrating improvements.
- **Procedures** to be followed in instances of concerns regarding the assurance and oversight system.
- 2.2.3. There are separate requirements related to assurance of compliance with SRP's Chain of Custody Standard. These are available for download at Resources SRP (sustainablerice.org).
- 2.2.4. Requirements related to claims, logo and label use and the SRP brand, can be found in the SRP Brand Manual & Claim Guidelines and available for download at Resources SRP (sustainablerice.org).

# 2.3. Major Roles in the Assurance Scheme

- 2.3.1. Key actors and their roles in delivering the Assurance Scheme are summarized below:
  - Conformity Assessment Body (CAB). CABs approved by SRP are
    responsible for planning and carrying out audits, making
    verification decisions (including suspension and withdrawal
    decisions), and providing reports and updating the SRP platform
    accordingly. CABs are also responsible for maintenance and
    oversight of competence as well as impartiality, conflict-ofinterest and complaints and appeals management as set out in
    this document.
  - Data Collector: Person responsible for collecting data and conducting internal assessment on behalf of producers and providing to the producer or producer group for passing to an approved CAB to validate and upload. A data collector may be a farm assurer, a research institute, company, extension worker, project owner, group manager or miller.
  - Farmer Organization (FO): legal entity responsible for commissioning and paying for SRP third-party assessments. They must be SRP members, and SRP membership and farmer registration dues are payable by the farmer organizations. A FO is a group of producers/farmers that want to commission a third-party assessment at their own cost without any sponsor organization.
  - **Producers or Producer Groups:** individuals or groups of farmers responsible for production of rice, who are eligible to apply for third-party assessment under the SRP Assurance Scheme.

Within a Producer Group all members are required to sign an



agreement to comply with the SRP Standard for Sustainable Rice Cultivation and the group's Internal Management System (IMS).

Producer groups can be legally or informally constituted. If legally structured, they may be known as 'Farmer Organizations'.

To achieve verification, producer groups without a legal entity are expected to follow the same processes as if they were a legal entity, in particular with regard to governance structures to implement an Internal Management System (IMS). If informally structured, in order to commission a third-party assessment, they need to engage with a Sponsor Organization (as Producer Groups without legal form cannot be SRP members).

- **Sponsor Organization:** sponsoring organization commissioning a third-party assessment and contracting with a CAB. The sponsor organization:
  - may be a private sector, not-for profit or other organization, including producer groups constituted as legal entities or individual producers,
  - ii. must be a member of SRP.
  - iii. will be responsible for payment of assessment fee and other fees as contracted with the CAB, SRP registration fee, etc.
- **SRP Secretariat:** Under the strategic oversight of the SRP Board, SRP's senior management is responsible for:
  - i. Overall functioning and improvement of the SRP Assurance Scheme, including information management and risk management.
  - ii. Setting requirements for CAB application and approval.
  - iii. Setting requirements for maintenance (or loss) of CAB approval.
  - iv. Specifying oversight procedures and reporting requirements.
  - v. Setting KPIs for CABs.
  - vi. Awarding, maintaining, suspending, withdrawing or reinstating approval of CABs.
  - vii. Maintaining a register of approved CABs.
  - viii. Oversight of CABs, including, reviewing audit reports, conducting witness and compliance audits<sup>2</sup>, reviewing CAB

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<sup>2</sup> In exceptional circumstances, for instance to ensure adequate language skills, SRP may contract witness or compliance audits to another organization. In such circumstances, SRP retains responsibility for ensuring the expertise and competence of those involved and that the processes they are required to follow are as set out in this document, in order to maintain the integrity of all aspects of the associated assurance.



- performance and assessing CABs against KPIs, CAB calibration, overseeing remediation of CAB NCs and applying sanctions to failing CABs.
- ix. Ensuring competence and qualifications of oversight personnel, including initial training and ongoing professional development delivered by the SRP Capacity Development Manager.
- x. Providing training to CAB auditors and other personnel as necessary.
- xi. Providing guidance and clarification to CABs as necessary.

# 2.4. Eligibility

- 2.4.1. Any participants in production, trade, transportation and processing of rice and rice products are eligible to apply for third-party assessment under the SRP Assurance Scheme. Third-party assessment may only be granted by approved CABs, and only to those demonstrating ongoing compliance with the SRP Standard. Note that compliance with Chain of Custody requirements is dealt with separately via the SRP Chain of Custody Policy and Standard.
- 2.4.2. Third-party assessment may only be carried out by an SRP-approved CAB whose personnel fulfill the qualification requirements defined in this document.
- 2.4.3. Any CAB may apply to SRP for approval, subject to the eligibility criteria set out in this document.

# 2.5. Development and delivery

- 2.5.1. The SRP Assurance Scheme Version 1.0 was based on the outcomes of field pilots and test audits conducted by SRP members in a number of rice-growing countries.
- 2.5.2. It was developed by an SRP Working Group on Standards, Assurance and Impact development and informed by ISEAL Alliance Guidelines.
- 2.5.3. Further technical specification in 2019 resulted in an updated draft released for online public consultation in March-April 2020. Over 200 comments received from stakeholders, together with responses were documented and are publicly accessible.
- 2.5.4. SRP Assurance Scheme Version 1.3 was approved in August 2020 by the SRP Board and launched in September 2020.
- 2.5.5. Development of Version 2 was led by an expert consultant working in consultation with key stakeholders, SRP Secretariat, Technical Committee and the SRP Board. Version 2.0 has been developed with the aim of delivering a robust, credible and cost-effective assurance tool to support value chain



actors, based on the collective experience in implementing Version 1.3 in a real-world commercial environment since September 2020.

# 2.6. Stakeholder input

2.6.1. Stakeholders are invited to provide feedback and suggestions on the SRP Assurance Scheme at any time. Please contact <u>info@sustainablerice.org.</u>



# 3. SRP ASSURANCE SCHEME: GENERAL PRINCIPLES

# 3.1. Ownership

3.1.1. SRP retains ownership of the SRP Assurance Scheme, Standard, Performance Indicators and all related trademarks via its legal entity (Sustainable Rice Platform e.V., registered in Germany). SRP reserves the right to access data and to conduct witness and compliance audits at its discretion.

# 3.2. Membership and Registration

- 3.2.1. Farmer organization or sponsoring organization commissioning a third-party assessment must be a member of SRP.
- 3.2.2. All value chain actors are encouraged to benefit fully by joining as full members of SRP.
- 3.2.3. Membership benefits include:
  - i. Opportunities to be part of decision-making processes and influence SRP's strategies and policy advocacy;
  - ii. Connecting with a diverse network of stakeholders in the rice value chain, opening doors to funding partnerships, business opportunities, and collaborative actions for sustainable rice production;
  - iii. Access to valuable insights from collaborative research, organizational materials, and SRP tools, as well as technical support from the SRP Secretariat;
  - iv. Receiving marketing and communication support from SRP to further enhance your organization's visibility and commitment to sustainability.
- 3.2.4. More information on registration of SRP membership available at <u>Become an SRP</u> Member SRP (sustainablerice.org).

### 3.3. Costs and fees

- 3.3.1. It is required as a minimum that the entity commissioning third-party assessment of a producer or producer group must be a fully paid-up member of SRP.
- 3.3.2. Producer groups that are informally structured (i.e. not legally incorporated) may apply for third-party assessment under the scheme via legally-incorporated sponsor organizations (e.g. a buyer).
- 3.3.3. For producers and producer groups not incorporated as a legal entity. SRP producer registration fees are payable not by the producers or producer groups themselves, but by the legally-incorporated organization (sponsor organization)



- that commissions and pays for third-party assessments of those producers or producer groups.
- 3.3.4. A sponsor organization may commission a third-party assessment on behalf of a producer or producer group and contract an approved CAB accordingly. The sponsor organization may be a private sector, not-for-profit or other organization including an individual producer or legally incorporated producer group, but must be a paying SRP member. The sponsor is responsible for payment of assessment fees, SRP farm registration and other fees as contracted with the approved CAB.
- 3.3.5. As stipulated in para 3.3.3, fees will be charged to the SRP sponsor organization (e.g. buyer, miller, trader), not to producer groups or individual producers, unless it is the producer group or individual producer that is contracting legally with the CAB and commissioning and paying for the assessment.
- 3.3.6. Conformity Assessment Bodies (CABs) are free to negotiate their own fees for assessments and related activities.

# 3.4. Individual producers and producer groups

- 3.4.1. Individual producers and producer groups as follows may register for the SRP Assurance Scheme.
  - **Producer:** an individual grower or single organization with a single production farm/plot or with several production farms/plots that do not function as separate legal or management entities. In the case of individual producers with multiple farms/plots, an Internal Management System (IMS) is required to cover all farms/plots.
  - Producer Group: a group of growers/farmers with the legal right
    to carry out agricultural production and/or trading and represents
    a group of growers and their production. Following SRP-approved
    verification, the group become the holder of the SRP-approved
    verification statement, which covers all group members within the
    scope of SRP third-party assessment. These groups may include
    farmer organizations producing SRP rice, or a miller operating a
    contract farmer scheme.
- 3.4.2. SRP has developed a management standard for Producer Groups, known as the Internal Management System (IMS) Standard, described in a separate normative document, available at Resources SRP (sustainablerice.org).
- 3.4.3. In order to ensure compliance among its members, the producer group must establish an IMS to provide transparent oversight and ensure with confidence that individual producers within the group meet the requirements of the SRP Standard. At the same time, the IMS plays a vital role in supporting learning for individual producers.



- 3.4.4. The IMS Standard sets out the formal requirements used by internal assessment and third-party assessment auditor to measure results and identify measures for continues improvement at IMS level. Compliance with the IMS Standard is mandatory for all producer groups and for all individual producers with multiple farms/plots. Producers' management processes will be assessed by CAB auditors using the SRP IMS Standard. In such cases auditing is generally only required of the IMS and a sample of the farms/plots under common management. The same sampling rules apply to individual producers with multiple farms/plots as to producer groups.
- 3.4.5. Additional requirements apply to producer groups and assessments of IMS. These are described in Sections 4 (Producer Groups), 8 (Additional Rules for Assessment of Producer Groups and IMS) and 11.5 (Sample sizes).

# 3.5. Communication of Verification Status

- 3.5.1. End-users of the SRP-Verified Label<sup>3</sup> need not be SRP members, but all use of the on-pack SRP-Verified Label:
  - i. must be in accordance with SRP Brand Manual & Claim Guidelines, and
  - ii. requires that users can prove the rice was produced by a producer holding a valid verification of compliance with the appropriate SRP Standards, and either the Identity Preservation or Segregation chain-of-custody model is used.
- 3.5.2. The SRP-Verified Label represents the integrity of claims to sustainable best practices according to the SRP Standards, as verified through the SRP Assurance Scheme. The SRP-Verified Label symbolizes a seal of approval.
- 3.5.3. Any use of the SRP name or trademarks is strictly limited to the rights granted by SRP as set out in SRP Brand Manual & Claim Guidelines and available for download at Resources SRP (sustainablerice.org).

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<sup>&</sup>lt;sup>3</sup> Note that the SRP Organizational *Logo* is primarily for the use of the organization and its members. Fair use of the SRP Organizational Logo by full SRP members is permitted and encouraged in appropriate non-commercial settings to raise awareness and visibility of SRP and its activities among stakeholders. Use of the SRP Organizational Logo in relation to the SRP Assurance Scheme is covered in the SRP Brand Manual & Claim Guidelines.



### 4. PRODUCER GROUPS

#### 4.1. Governance

- 4.1.1. For all producer groups, and as set out in the SRP IMS Standard, an IMS team comprising group members shall be established with clear separation of roles (overall management, training, self-assessment, compliance decision taking, purchasing, etc.). Some of these roles may be carried out by the same person, provided there is no conflict of interest, whether actual or perceived (e.g. self-assessment and purchasing).
- 4.1.2. For all producer groups, each member of the producer group shall, at least annually, give written consent to participate as a member of the group. Consent declarations, including dates and descriptions, shall be retained on file.
- 4.1.3. For all producer groups, each member of the producer group shall be aware of the benefits and responsibilities of group membership, including the right to appeal decisions on their membership, as set out in the SRP IMS Standard.
- 4.1.4. Each producer group member shall receive relevant training in implementing the relevant SRP Standards. This training may be provided internally by a competent person within the IMS. Training records with dates and descriptions shall be maintained.
- 4.1.5. The IMS team shall guarantee, and provide documented evidence on request, that the IMS is self-assessed and that all producer group members receive or conduct internal assessments according to the frequency defined in the SRP Assurance Scheme.

# 4.2. Control System

- 4.2.1. All producer groups shall assign a responsible individual as IMS Manager who defines and coordinates the IMS protocol and related procedures.
- 4.2.2. The person who has been assigned the responsibility for the IMS shall ensure that all group members are in compliance with the IMS and SRP Standard requirements. This individual shall also be responsible for leading the implementation of any corrective action plans required. There are minimum requirements for each role and function within IMS as stipulated in IMS Standard.
- 4.2.3. All producer groups shall establish a clear and credible grievance procedure for members in case of dispute. This procedure shall ensure that member complaints are received, registered, identified, investigated, followed up and reviewed.
- 4.2.4. Producers removed from group membership shall have the right to appeal the decision, following the producer group's grievance procedure.



# 5. REGISTRATION REQUIREMENTS

# 5.1. Obligations of producers and producer groups

- 5.1.1. Participation in the SRP Assurance Scheme begins with a public commitment by producers or producer groups to work with the available SRP tools such as training, as well as Assurance instruments e.g. SRP Standard for Sustainable Cultivation, CoC Policy and Standard, IMS Standard. Registration for verification is only required for producers or producer groups wishing to proceed to third-party assessment. It is not required for producers or producer groups or SRP-registered projects who are only conducting internal assessment or self-assessment but not proceeding to third-party assessment.
- 5.1.2. The details of producer and producer group registration and data management requirements are presented in the SRP Data Management Rules for Assurance Scheme and available for download at Resources SRP (sustainablerice.org).
- 5.1.3. By registering, the applicant producer/producer group commits to comply with the assessment requirements at all times, to communicate data updates to the CAB in a timely way and to pay all applicable fees.
- 5.1.4. Information regarding production plots of the producer/producer group is required. In case of a producer with multiple farms or a producer group, a group member registry should be submitted as part of the registration process.
- 5.1.5. An applicant producer or producer group may not register the same members or farms or plots with different CABs.
- 5.1.6. For registration to be completed, the applicant must satisfy all the following conditions:
  - i. Submit the application to the CAB, together with all documentation required as set out in this document.
  - ii. Sign the latest version of a SRP Sublicense Registration Agreement. SRP will provide a template to all approved CABs, for CABs to provide to applicants.
  - iii. Have all applicant data uploaded to the SRP Assurance Platform, including for producer groups the name and contact details of the responsible individual assigned who defines and coordinates the Internal Management System (IMS) protocol and related procedures as well as the Group Members Registry.
- 5.1.7. Producer group members are not allowed to transfer to another group (for the products registered) if there is any pending sanction on the producer issued by the group, or if there are any open non-conformities (NCs) or unresolved issues relevant to the producer raised by the CAB. Such sanctions must be resolved



- before the producer can transfer to another group, which must also be in accordance with the requirements of the SRP IMS Standard.
- 5.1.8. A producer or producer group may only work with one approved CAB at any one time.

# 5.2. Responsibilities of approved CABs

- 5.2.1. The approved CAB selected by the producer or producer group is responsible for verifying and uploading the applicant's data to the SRP Assurance Platform and completing the registration process, as well as for verifying all data updates. All participating producers must be registered in the SRP Assurance Platform with their individual and aggregated data (as per SRP Data Management Rules for Assurance Scheme) which reflects their verification status. The CAB shall also consider any potential previous producer registration to avoid duplication on the SRP Assurance Platform.
- 5.2.2. The registration process must be finalized before a third-party assessment can proceed. The CAB must confirm the registration and provide the applicant with a budget proposal within 7 calendar days of receiving the complete application.
- 5.2.3. In the case of producer groups, the registration of producers' personal data (name, address, phone number, production area, estimated production volume, GPS location etc.) should be registered in the Group Members Registry (GMR). Each member of the producer group shall give written consent as part of consent declaration when they participate as a member of the group. These data must be verified by an approved CAB during a third-party assessment.

# 5.3. Responsibilities of SRP

- 5.3.1. SRP provides oversight and overall management of the Assurance Platform.
- 5.3.2. To prevent duplication, confirmation of registration is provided by SRP, after data verification by an approved CAB.
- 5.3.3. SRP reserves the right to remove registered producers or producer groups from the SRP Assurance Platform at any time, for example in case of:
  - i. Inaccurate data, or data errors left uncorrected.
  - ii. Violation of SRP publication procedures or SRP membership requirements, or failure to rectify such violations within a given period.



#### 6. INTERNAL ASSESSMENT

#### 6.1. About Internal Assessment

- 6.1.1. Producers and producer groups who do not wish or are not ready to proceed to third-party assessment may use internal assessment to facilitate monitoring of performance at low cost and potentially at larger scale. This allows producer groups or SRP members working with producers to conduct assessments without external verification, as a means of internally monitoring performance and driving continuous improvement.
- 6.1.2. Internal assessment is also intended to support field-level implementation of rice sector policies and large-scale initiatives e.g. by governments and development partners, aligned with national policy goals e.g. on food and water security, livelihoods, biodiversity or climate change.
- 6.1.3. Internal assessment is appropriate as a tool for development projects where farmer livelihoods, environmental and climate benefits and support for Sustainable Development Goals, rather than market factors, are the principal drivers of change.
- 6.1.4. It is important to note that no external claims or label or logo use are permitted by internal assessment, and no registration is required.
- 6.1.5. Internal assessment may be conducted by producer groups, producers themselves or an appointed individual or organization.
- 6.1.6. There is no formal qualification requirement for the person conducting an internal assessment. However, a good understanding of SRP Standard requirements and the SRP Assurance Scheme are essential to ensure that the person conducting an internal assessment is competent and can conduct the internal assessment effectively.

# 6.2. Internal assessments prior to third-party assessments

- 6.2.1. Internal assessments are also part of preparation for third-party assessments and all producers and producer groups are required to undergo internal assessment prior to any third-party assessment by an approved CAB.
- 6.2.2. All internal assessments that precede third-party assessment must be conducted using a checklist covering all elements of the SRP Standard.
- 6.2.3. During the third-party assessment, the result of internal assessment will be verified and recorded as part of the verification process.



# 6.3. Scope of internal assessments that precede third-party assessments for producer groups and individual producers with multiple farms/plots.

- 6.3.1. For producer groups and individual producers with multiple farms/plots:
  - i. Adherence to the rules of the IMS must be well documented.
  - ii. Records of internal assessments with dates and descriptions must be maintained.
  - iii. Internal assessments of 100% of group members registered for SRP verification are required prior to initial third-party assessment, and prior to three-yearly scheduled on-site third-party assessment. Other internal assessments may be based on sampling focused on members with a higher risk of non-compliances and/or to ensure all types of rice growing are included. However, a minimum of 33% of group members shall be assessed every year and all producers must be assessed internally at least once every 3 years.
  - iv. Internal assessments may be conducted by IMS internal inspectors, by producers' peers or by the producers themselves.

# 6.4. Frequency of internal assessments and self-assessments that precede third-party assessment

- 6.4.1. Individual producers are advised to conduct annual peer-to-peer inspections/internal assessments before a third-party assessment.
- 6.4.2. Producer groups are required to conduct self-assessments against the SRP IMS Standard within the 12 months following date of first registration in the SRP Scheme and before the initial third-party assessment, and thereafter every year, and always (no more than 6 months) before an announced external third-party assessment.



# 7. THIRD-PARTY ASSESSMENT

# 7.1. About Third-Party Assessment

- 7.1.1. Third-party assessment is based on an assessment conducted by an impartial, SRP-approved CAB.
- 7.1.2. Upon successful verification, the CAB will issue an SRP Verification Statement that specifies the performance of the producer or producer group including compliance score, compliance status, estimated verified volume, and permitted claims.

# 7.2. General rules

- 7.2.1. Third-party verification may only be undertaken by a CAB approved by SRP.
- 7.2.2. Third-party audits may only be carried out by a CAB auditor complying with the qualification requirements for third-party auditors specified in this Assurance Scheme.
- 7.2.3. Verification takes place through a three-year cycle.
- 7.2.4. During the three-year cycle, every producer or producer group is required to undergo two announced full on-site audits, and one unannounced full on-site audit.
- 7.2.5. An agreement between a producer or a producer group with an approved CAB should be for one three-year cycle.
- 7.2.6. When a CAB conducts a producer or producer group third-party assessment that has been commissioned by a Sponsor Organization, the CAB must ensure there is prior, written consent of the producer or producer group regarding such an arrangement, and the producer or producer group should understand the terms and conditions in the Sublicence and Registration Agreement (SRA).
- 7.2.7. If a producer or producer group wishes to change the CAB contracted to provide verification services at any time between two full on-site announced audits, they may only do so if there are no outstanding payments (including membership fees), and no open non-conformities. The producer or producer group must inform the new CAB of all relevant verification history, including the previous assessment results within that cycle. The new CAB must complete the remaining steps in the producer's or producer group's three-year verification cycle.
- 7.2.8. All reports from third-party assessments must be approved by a CAB Reviewer independent from the auditor conducting the audit within 28 days following the last date of audit.



7.2.9. Third-party verification statements are valid for 36 months from the date of closure of the full scheduled onsite audit report, which will always be the date of approval by the CAB Reviewer, unless a subsequent assessment or other event provides justification for suspension or withdrawal of the verification.

# 7.3. Scope of third-party assessment

7.3.1. All third-party on-site audits, announced or unannounced, shall be conducted using the latest SRP checklist covering all elements of the SRP Standard.

# 7.4. Sampling: general provisions

- 7.4.1. Section 11 (sample sizes) provides guidance to CABs on how to determine samples and sample size.
- 7.4.2. CABs are required to document their rationale for the sample and sample size chosen.
- 7.4.3. No more than 2 days prior notification shall be given by the CAB to the producer group identifying the members selected in a sample.

# 7.5. Audit duration

- 7.5.1. Sufficient time must be allocated to allow the auditor to audit all applicable SRP Standard requirements.
- 7.5.2. Typically, on-farm/plot audits for individual producers require an average 1 day for farms up to 10 hectares (and more for larger farms) in order to effectively assess an organization's systems and premises and provide confidence in the verification process. The actual duration will of course depend upon specific conditions (e.g. organization, logistics, preparation, access, weather, etc.).
- 7.5.3. In the case of a group of smallholder farmers (below 10 hectares, most commonly below 2 hectares) with an Internal Management System (IMS), a minimum of 1 day is also typically required for an on-farm/plot audit to assess the group management structure, IMS's self-assessment and internal assessment results. This shall be followed by a visit to a sample of group members.
- 7.5.4. While ensuring all types of rice production are included, a group's initial audit shall otherwise be of a random selection of producers. Subsequent audits shall select producers by priority according to risk of missed mandatory thresholds<sup>4</sup>, while still ensuring all types of rice production are included, as described in Section 11 (sample sizes).

<sup>4</sup> The set of mandatory thresholds can be found in the SRP Standard for Sustainable Rice Cultivation.



7.5.5. Audits of individual group members will usually have a shorter duration than for individual producers because some of the requirements will already have been assessed at IMS level and/or are common for all group members. This can allow audits of 4 to 7 group members / producers per day.

# 7.6. Audit timing and frequency

- 7.6.1. On-site audits must be conducted at a moment when it is possible to assess compliance with all requirements of the SRP Standard, either via documentation, visually or through interviews.
- 7.6.2. Within each three-year assessment cycle, at least one on-site audit should be conducted during harvest season, or prior to harvest when the paddies are ready for harvesting so that the auditor can verify performance in the field.
- 7.6.3. The one unannounced audit that is conducted in each three-year cycle may require more time to arrange and anticipate the situation in the field, therefore it will take place either:
  - On the 2<sup>nd</sup> year of the cycle between 6 and 18 months after the scheduled on-site audit, or
  - On the 3<sup>rd</sup> year of the cycle between 18 and 30 months after the scheduled on-site audit
- 7.6.4. The SRP Standard for Sustainable Rice Cultivation deals with the production of a mostly seasonal product and will therefore require flexibility in audit timing, CABs may thus use an audit window of 8 months around the 'annual' audit to enable all seasonal aspects to be assessed. In other words, the second full audit in a three-year cycle must take place between 8 and 16 months after the first full audit in the cycle, and the third full audit between 20 and 28 months after the first full audit in the cycle; although the minimum period between any two audits should not be less than six months or more than sixteen months.

#### 7.7. Unannounced audits

- 7.7.1. The CAB must conduct at least one unannounced audit during a three-year assessment cycle.
- 7.7.2. CABs may notify producers ahead of the intended on-farm/plot visit. However, generally no more than 1 day's notice may be given before the planned audit date (or a maximum of 2 days where exceptional logistical challenges arise). In the exceptional case where for well-justified reasons it is impossible for the producer to accept the proposed date of the unannounced audit, the producer will receive one more chance to be informed of an unannounced audit. The producer shall



- receive a written notification if the first proposed date has not been accepted and will be given another notification of a visit.
- 7.7.3. If the visit cannot take place for non-justifiable reasons, the CAB shall inform SRP and SRP may revoke the producer's rights to use SRP-Verified Label and/or Claims.
- 7.7.4. Audit reports and other tools (e.g., audit meeting logs) must clearly state whether audits are announced or unannounced

### 7.8. Additional audits

- 7.8.1. Irrespective of the prescribed audit frequency and assessment cycle, the CAB may undertake additional announced or unannounced surveillance assessments. This may occur in response to credible evidence or suspicion of missed standard requirement thresholds within a producer / producer group, and/or in cases where there is a complaint or grievance from an external party received by SRP or CAB, especially if it may affect the right to use SRP Claims or Label on product packaging.
- 7.8.2. The assessment shall focus on any specific SRP requirements where mandatory thresholds may be missed; a full audits of all control points will not normally be required. Assessment costs will usually be charged to the producer / producer group if the assessment confirms the suspicion or the complaint.

# 7.9. Scoring system and associated claims

- 7.9.1. The SRP Standard for Sustainable Rice Cultivation allows for step-wise compliance to encourage and reward progress toward full compliance. All requirements have several possible levels of compliance. This allows for the Standard to be used both as a basis for assessments and as a directional improvement tool to promote farmer adoption. Different claims are available in recognition that improving farmer compliance takes time and can be a challenging process.
- 7.9.2. Details of the scoring system are available in the SRP Standard document. The total score against the SRP Standard is presented on a 0-100 scale.
- 7.9.3. In order to be able to make an SRP claim a producer or producer group needs to comply fully with the relevant provisions set out in the SRP Assurance Scheme and SRP Brand Manual and Claim Guidelines.
- 7.9.4. SRP has set a minimum required score (33%) and a set of mandatory compliance levels (thresholds) that must be achieved to meet a claim of "Working toward



- sustainable rice cultivation". This set of mandatory thresholds<sup>5</sup> relate to farmers' health and food safety.
- 7.9.5. A claim of sustainable rice cultivation can only be made if all mandatory thresholds are met, and a minimum score of 90% is achieved.
- 7.9.6. For producer groups and individual producers with multiple farms/plots, the SRP IMS Standard scoring also applies. The total score against the IMS Standard is also presented on a 0-100 scale. A claim of sustainable rice cultivation can only be made if all mandatory standard requirement thresholds are met, and a minimum score of 90% is achieved for the SRP Standard for Sustainable Rice Cultivation and 75% for the SRP IMS Standard.

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 $<sup>^{5}</sup>$  The set of mandatory thresholds can be found in the SRP Standard for Sustainable Rice Cultivation.



# 8. ADDITIONAL RULES FOR ASSESSMENT OF PRODUCER GROUPS AND IMS

The following rules apply to all producer groups, and to individual producers with multiple farms/plots and IMS assessments.

# 8.1. Assessment of Internal Management Systems (IMS)

- 8.1.1. The assessment process is designed to establish that the IMS, including internal assessments, is effective in meeting the requirements of the SRP Standards.
- 8.1.2. The assessment process requires sampling of IMS components, comprising documentation, farms/plots, personnel and operations relevant to the operation and administration of the IMS.
- 8.1.3. IMS documentation review will normally be performed at the producer's or producer group's central office/administrative center, with farm/plot visits covering relevant IMS requirements e.g., self-assessments, training, etc.
- 8.1.4. As part of the IMS assessment, the results of external and internal and self-assessments must be compared to assess whether the applicant's internal controls are appropriate.

# 8.2. Adding and removing group members

- 8.2.1. As part of the SRP IMS Standard requirements, IMS must have an approval and sanction system in place to add new members or remove group members. This includes an approval and sanction manager or committee, a procedure for decision-making and corrective measures, and a documented and signed up-to-date decision for all group members, as well as communication of all decisions to the respective members.
- 8.2.2. New members shall undergo an internal assessment before being included in the group. The CAB must be informed by the group so that added members can be registered in the SRP platform using the scope change function.
- 8.2.3. If, between third-party assessments, the group wishes to either change the number of members by 10% or more, or the area covered by the group by 10% or more, a new third-party assessment is required before the change can be made.
- 8.2.4. For changes between assessments of less than 10% of both number and area, the producer group must provide the CAB with an updated Group Member Registry for the CAB to update the SRP platform and submit internal assessment(s) for the



- changed members. New members that fail to meet mandatory thresholds<sup>6</sup> in the internal assessment shall not join the group.
- 8.2.5. Regardless of the scale of changes an additional invoice from the CAB may be required, in part resulting from the applied farmer registration fee/ha.
- 8.2.6. There are various reasons for removing group members. Every group member removal should be updated in the SRP Assurance Platform.
- 8.2.7. If the removal of a group member relates to a group member's performance, the process should be in accordance with the IMS approval and sanction system.
- 8.2.8. A group member may return to the group by following the approval and sanction system.
- 8.2.9. If a group member's removal is due to performance-related mandatory requirements, they may apply to rejoin the group after one harvest season if they can demonstrate an improvement in performance.
- 8.2.10. In cases where a group member has died or the land has been sold to another farmer, the group shall inform the CAB in order to update the Group Member Registry in the SRP Assurance Platform and register a new owner if that is the case.

# 8.3. Consequences of non-compliances

- 8.3.1. Where a group member is found to have a NC for any standard requirement, for the purposes of a verification decision the whole group is considered to not reach the necessary level for that requirement until the NC is satisfactorily closed. However, the required response depends on whether the NC is found in just one member of the group, or in two or more members of a producer group:
- 8.3.2. If the NC is found in just one member of the group, the assigned responsible individual within the group must:
  - i. Remind all group members of the relevant requirement.
  - ii. Review their internal assessment methodology to investigate and document how the NC came about, including how it had previously been missed if it is found to have persisted for some time.
  - iii. Require the group member concerned to provide evidence of compliance to enable the CAB to close the NC.
  - iv. Require all group members to provide evidence of compliance with the requirement at the next internal assessment.

 $<sup>^{6}</sup>$  The set of mandatory thresholds can be found in the SRP Standard for Sustainable Rice Cultivation.



- 8.3.3. If the NC is found in two or more members of a producer group, the assigned responsible individual within the group must:
  - i. Carry out and document an extent analysis to establish how many members exhibit the NC.
  - ii. Remind all group members of the relevant requirements.
  - iii. Review the internal assessment and self-assessment methodology to investigate and document how the NC came about, including how it had previously been missed if it is found to have persisted for some time.
  - iv. Require the group members concerned to provide evidence of compliance to enable the CAB to close the NC.
  - v. Require all group members to provide evidence of compliance with the requirement at the next internal assessment.



# 9. CONFORMITY ASSESSMENT BODIES: ROLES, REQUIREMENTS AND OVERSIGHT

# 9.1. SRP rights and responsibilities

- 9.1.1. The approval of Conformity Assessment Bodies (CABs) is solely the right of SRP.
- 9.1.2. To provide a wide scope of professional services while facilitating competitiveness SRP may approve multiple CABs.
- 9.1.3. SRP is also responsible for:
  - Ensuring and protecting the proper use of the SRP Scheme by producers and CABs in compliance with the prevailing versions of the SRP Standard, Assurance Scheme and other SRP normative documents.
  - ii. Supporting CABs to correctly, effectively, consistently and impartially assess compliance with the SRP Standard, including providing guidance and clarification to CABs as necessary.
  - iii. Ensuring that a publicly available and regularly updated list of SRP-approved CABs is posted on the SRP webpage.
  - iv. Managing registration of farm data into a dedicated platform used exclusively for the SRP Scheme. Ownership of data will remain with the producers and SRP, and its use will follow prevailing EU data protection requirements, and local regulations.
  - v. Assessing and approving applications of CABs, and where necessary applying sanctions including suspension or withdrawal of CAB's approval.
  - vi. Oversight of CAB performance with application of sanctions as necessary.
  - vii. Managing a complaints and grievance process.
  - viii. Authorizing SRP training providers to train CABs and auditors and implementing procedures to verify the SRP-specific competence of approved CAB auditors.
  - ix. Conducting witness audits and compliance audits.
  - x. Calibration of CABs.
  - xi. Oversight of remediation of CAB NCs.
  - xii. Ensuring the competence and qualifications of oversight personnel.



- xiii. Reviews of the assurance oversight system.
- 9.1.4. SRP reserves the right to conduct integrity audits either witness or compliance audits. These audits are aimed at ensuring correct implementation of the SRP Assurance Scheme and uphold SRP's credibility and brand value. Integrity audits will occur infrequently and will not follow a regular schedule. The costs of SRP integrity audits will be covered by SRP.
- 9.1.5. SRP shall be entitled to participate, upon prior notice and at its own cost, in all audits carried out by approved CABs.
- 9.1.6. SRP reserves the right to ask for proof of the qualifications of the auditors approved by the CAB. In the case that the CAB is not able to submit such proof, and/or the auditors do not comply with the qualification requirements, SRP reserves the right to remove those persons from the list of approved auditors in the SRP Assurance Platform.
- 9.1.7. If a CAB is found to have failed to follow mandatory procedures, the CAB may be required to reimburse all related integrity audit costs incurred. Following its Grievance and Dispute Resolution Policy, SRP reserves the right to request suspension or cancellation of verifications in the event of serious violations.
- 9.1.8. SRP is committed to providing full transparency regarding approved CABs and will deal directly with related public comments and complaints according to its Grievance and Dispute Resolution Policy.
- 9.1.9. Concerns or complaints can be directed to the SRP Secretariat (for instance by email to <a href="mailto:grievances@sustainablerice.org">grievances@sustainablerice.org</a>) at any time and will be addressed through SRP's or the CAB's established procedures as detailed in SRP's Grievance and Dispute Resolution Policy. If a stakeholder does not accept the outcome of this process, SRP may at its sole discretion decide to conduct an extraordinary investigative audit, whose outcome shall be final.

# 9.2. General CAB requirements

- 9.2.1. CABs are required to pass an application process before formal approval.
- 9.2.2. Only approved CABs, that have entered an appropriate legal contract with SRP shall conduct third-party assessments.
- 9.2.3. Verifications can only be issued by CABs approved by SRP.
- 9.2.4. Approved CABs are responsible for independent assessment of the compliance of any producer or group of producers with the requirements of the SRP Standard.
- 9.2.5. CABs are required to be compliant with this SRP Assurance Scheme, the latest version available at <u>Resources SRP (sustainablerice.org)</u>.



9.2.6. Approved CABs enter into a legal contract with SRP by signing a License and Registration Agreement (LRA), specifying the range of work (globally, nationally, partner-specific) and the scope of work.

# 9.3. Gaining approval: legal and administrative requirements.

- 9.3.1. Applicant CABs are required to provide the following to SRP:
  - i. A formal letter of intent to become an approved CAB.
  - ii. Head office address, contact name and email.
  - iii. Evidence of the applicant CAB being a legal entity.
  - iv. Evidence of the countries in which it is legally eligible to operate as a CAB.
  - v. Details of all offices of the applicant CAB that would be involved in the SRP assurance program and in what capacity, and details of nominated person or persons that are key points of contact for the SRP program.
  - vi. A copy of a valid Liability/Indemnity Insurance Certificate with a value of at least €100,000.
  - vii. Evidence of sufficient resources to meet SRP requirements and conduct third-party assessments.
  - viii. Evidence of management commitment to the integrity of the SRP program and sufficient responsiveness to clients.
  - ix. A CAB internal assessment to determine if all competency, resource, and other requirements are fully met.
  - x. Payment of the relevant fees.
  - xi. The CAB must be accredited for at least one ISO 17065 agricultural or forestry standard (or apply for accreditation at the same time as applying to be an approved CAB).

# 9.4. Gaining approval: personnel requirements.

- 9.4.1. Applicant CABs are required to provide the following to SRP:
  - i. Evidence of sufficient staff with appropriate competency to manage an assessment and oversight program of assessment to the SRP Standard. This should include details of locations, numbers, and competency of the key CAB personnel, auditors and subcontractors, including language abilities.



- ii. Details of an SRP Scheme Manager who will be the main responsible person for SRP at the CAB and the contact with SRP.
- iii. Details of an in-house trainer who will be responsible for providing mandatory annual training for the CAB's auditors and any other staff whose work is related with SRP. The In-house trainer will be required to comply at least with auditor qualification requirements and obtain SRP certificates of participation in formal SRP training on the standard and the auditor training. This person must be fluent in English.
- iv. Procedures for ongoing auditor and subcontracted auditor training, oversight, performance tracking and calibration.
- v. Details of a staff member responsible for development, implementation and maintenance of the CAB's quality system.

# 9.5. Gaining approval: procedural and management requirements.

- 9.5.1. Applicant CABs are required to provide to SRP evidence of the CAB's procedures for:
  - i. Quality management.
  - ii. Assessing compliance with the SRP Standard.
  - iii. Technical review of audit reports, non-compliances, root cause analyses, corrective action plans and corrective action evidence.
  - iv. Making verification decisions.
  - v. Retaining authority for decisions related to their assessments and verification activities.
  - vi. Managing appeals and complaints.
  - vii. Ensuring all personnel operate to the highest levels of professional integrity and impartiality, being free from commercial, financial or other pressures that might affect their judgment, and being expressly forbidden from promoting any goods or services related to assessment and verification activities.
  - viii. Prevention of bribery and corruption at all levels of its organization.
  - ix. Prevention of conflict of interest amongst CAB personnel, auditors, and subcontracted auditors and ensuring independence from any producer/producer group audited to



guarantee the impartiality of all audits. Note that the CAB's auditors or other personnel are allowed to provide information on SRP's normative documents or other SRP guidance notes and the audit report to clients during an assessment. However, consultancy is never allowed.

- x. Ensuring and retaining accountability and responsibility for the quality and integrity of any SRP assurance activities outsourced to any other body.
- xi. Immediately notifying SRP of any withdrawal or suspension of a verification, and updating the SRP Assurance Platform accordingly.
- xii. Ensuring that SRP is notified immediately in the event of any conflict or problem that could result in reputational damage to SRP and agreeing on appropriate corrective action.
- xiii. Ensuring that clients agree to be registered and undergo potential integrity audits conducted by the SRP. Note that costs of integrity audits will be covered by SRP. However, if during integrity audits, incidents are found that lead to follow-up integrity audit visits, the SRP reserves the right to charge the CAB for these additional integrity audit visits.
- xiv. Ensuring that the same auditor does not audit a producer or producer group for 3 consecutive audits (regardless of whether it is an announced or unannounced audit).
- xv. Fully complying with other requirements as set out in this document.
- 9.5.2. Applicant CABs are required to provide to SRP details of the charges the CAB will make to clients in the SRP assurance program.

# 9.6. Granting of approval

- 9.6.1. Once the SRP Standard & Assurance Manager has reviewed and passed the application documentation, which must be submitted in English, and once the CAB has entered into a legal contract with SRP, SRP will inform the CAB that they are approved.
- 9.6.2. Once the CAB has signed an LRA with SRP, they may start conducting assessments against the SRP standard as per their requested approval scope.

# 9.7. Maintaining approval: legal and administrative requirements.

9.7.1. Following initial approval, and in order to maintain approval the CAB shall:



- i. Pay any relevant fees.
- ii. Update SRP within 7 calendar days of any changes to the information provided during the CAB's application process.
- iii. Maintain and make available to SRP on request, a register of approved auditors, recording details of their competence (see details below), education, relevant experience and scope(s) of activity. This register held by the CAB must contain at least:
  - Name and address
  - Organizational affiliation and position
  - Educational qualification and professional status
  - Experience and training in relevant fields of competence relating to the SRP Standard.
  - A list of the SRP assessments they have been involved in and their roles in those assessments.
- iv. Distribute all relevant communication received from SRP to all CAB staff involved in SRP-related activities in all countries.
- v. Inform SRP of any changes to the CAB's ISO 17065 or other relevant accreditation status within 7 calendar days of the change.
- vi. Ensure availability of accessible information including checklist and supporting evidence on all audit and inspection details (including those of the unannounced audits) as well as details for each verification.
- vii. Provide copies of SRP verifications and audit reports, according to the specified template and schedule.
- viii. Provide specified data and information about assessments to SRP to enable SRP to operate its Monitoring, Evaluation and Learning system;
- ix. Assist in organizing integrity audits.
- 9.7.2. CABs that are overdue in settling SRP membership dues by 90 days from invoice date shall be notified and if not rectified within 14 days of notification, may have their SRP approval to conduct assessments or to use the SRP-Verified trademark suspended by SRP until arrears are fully settled.
- 9.7.3. Failure to settle after a further 30 days will result in withdrawal of approval. In the event of a CAB being suspended or having their approval withdrawn, SRP will on a



case-by-case basis ensure that fair arrangements can be made by the CAB's clients to achieve or maintain verification.

## 9.8. Maintaining approval: personnel requirements.

- 9.8.1. Following initial approval, and in order to maintain approval the CAB shall:
  - i. Ensure all relevant personnel are aware of and use the CAB's documented quality system.
  - ii. Ensure all relevant personnel receive ongoing training by SRP in the SRP Standard, verification and assurance procedures;
  - iii. Ensure that auditors assigned to assessments meet the competence, experience and training requirements outlined in this document.
  - iv. Ensure that interpreters or technical experts employed are independent of the client, unless this is not feasible due to logistical constraints in which case a declaration of interest shall be included in the audit report. In all cases, the names and affiliations of these experts shall be included in audit reports. (During oversight activities SRP shall also ensure that interpreters or technical experts they employ or contract are independent of the client, unless this is not feasible due to logistical constraints, in which case a declaration of interest shall be included.)
  - v. For each assessment, appoint a Reviewer with SRP auditor qualification, responsible for the verification decision.
  - vi. The CAB must carry out a witness audit of each of its SRP auditors at least once every 4 years to verify competence.

## 9.9. Maintaining approval: procedural and management requirements.

- 9.9.1. Following initial approval, and in order to maintain approval the CAB shall:
  - i. Implement the requirements outlined in the SRP Assurance Scheme;
  - ii. Continue to comply with all SRP Agreements, Standards, Requirements, Policies, Procedures as provided and as amended. This includes co-operation and access to information, staff, and farms/plots as required for SRP.
  - iii. Maintain systems for ensuring impartiality and avoiding conflicts of interest.



- Take action to investigate, remedy and prevent recurrence of any non-compliances regarding CAB's responsibilities within the Assurance Scheme identified by SRP or CAB internal audits. CABs will be expected to provide a root cause and extent analysis leading to preventive action as well as a correction to the identified non-compliance within a timescale specified by SRP on a case-by-case basis but not exceeding twelve months.
- v. Implement an ongoing program for calibration of auditors and other assurance personnel.
- vi. Enable recurring demonstration of auditor competence through evaluation (by SRP or other parties appointed by SRP), using integrity audits that include witnessing auditor performance.
- vii. Conduct annual internal audits on SRP Assurance Scheme related performance and share the results with SRP.
- viii. Apply the SRP Brand Manual and Claim Guidelines for claims made in relation to the CAB's SRP approval status.

## 9.10. Maintaining approval: provision of information.

- 9.10.1. Following initial approval, and in order to maintain approval the CAB shall:
  - i. Be fully paid-up members of the Sustainable Rice Platform.
  - ii. Communicate to its SRP-registered clients all relevant updates, as well as the date of first application and transition periods for any new SRP versions of normative documents.
  - iii. Clearly explain the SRP Data Management Rules for Assurance Scheme to clients and obtain their written consent.
  - iv. Treat applicant information in confidence unless otherwise required by law, or with the applicant's prior consent.
  - v. Co-operate with performance monitoring through a CAB key performance indicators (KPIs) mechanism. CABs will be advised by SRP of any areas needing improvement. Unacceptable performance will lead to sanctions as well as possible suspension or withdrawal of approval at SRP's discretion.
  - vi. In addition to requirements set out in this document, such KPIs shall include:
    - Timely arrangement and conducting of scheduled and unannounced on-farm/plot audits.



- Maximum times for responding to clients and organising audits.
- Maximum times for completion of audit reports, issuing of verifications and follow-up of non-compliances and corrective action reports.
- Issuing reminders for audits and completion of corrective actions.
- Maximum times for responding to communications from SRP.

# 9.11. Maintaining approval: complaints and appeals management requirements.

- 9.11.1. Following initial approval, and in order to maintain approval the CAB shall:
  - i. Participate, where requested, in SRP's efforts to investigate complaints and incidents of potential transgressions and non-compliance with SRP Standards.
  - ii. Implement a publicly available appeals procedure whereby producers and producer groups can appeal verification decisions.
  - iii. Have a publicly available and accessible complaints system that investigates and takes appropriate action regarding relevant complaints, within defined timelines, and review and take any necessary corrective actions.
  - iv. Actively cooperate with SRP during management of complaints related to the CAB or to a producer or producer group contracted by the CAB.
  - v. Keep a record of all complaints and resulting actions, to be made available for internal audits and management reviews.

## 9.12. Suspension or Cancellation of Agreement

- 9.12.1. In case a CAB wishes to terminate its Agreement with SRP, the following actions must be taken:
  - i. The CAB must send a formal termination request to SRP.
  - ii. The CAB must immediately inform all clients that future assessment and verification activities have to be carried out by another approved CAB.
- 9.12.2. The CAB shall be responsible for transferring all their verified clients to other active CABs; termination will be effective when this has been completed.



#### 10. AUDITING

#### 10.1. Legal agreement

- 10.1.1. Prior to an audit, the producer or producer group must enter a binding legal agreement with the CAB, beside signing the Sublicense and Registration Agreement (SRA). Another agreement shall include:
  - i. Audit scope, timing and cost;
  - ii. Requirements for the producer or producer group to verify there are no outstanding payments relating to assessments and SRP membership dues;
  - iii. Requirements for the producer or producer group to provide data and information requested by the SRP Monitoring, Evaluation and Learning System;
  - iv. Commitments by the CAB to treat data confidentially and securely and to adhere to the SRP Data Privacy Policy;
  - v. Acknowledgment that the CAB will have access to all records held by the producer or producer group in order to enable verification of their audit findings;
  - vi. Acknowledgement that data and audit outcomes will be shared with SRP and that SRP will issue a publicly available summary audit report.

#### 10.2. General provisions

- 10.2.1. For announced audits, an audit plan shall be provided to the producer or producer group a minimum of five calendar days before the audit.
- 10.2.2. Prior to audit, the CAB shall outline its process from start to end. The producer or producer group shall be made aware that the CAB must have access to all records held by the producer or producer group in order to be able to verify their findings.
- 10.2.3. The CAB shall complete a full audit of the producer's or producer group's operation, including tours of farms and/or observing farming activities during onsite audit, subject to the sampling requirements identified in this document.
- 10.2.4. The CAB shall assess the producer or producer group against the appropriate standard. The CAB shall collect evidence at every stage. Where a CAB finds any non-compliances, these shall be clearly expressed in the audit report and supported with relevant evidence.
- 10.2.5. The CAB may also suggest 'Opportunities for Improvement' (OFIs) to the producer or producer group. While this information must be documented in the audit report,



- it must be clear to the producer or producer group that the information is not normative and that they can choose the path of improvements that best suits their organization.
- 10.2.6. A meeting shall be held with the producer or producer group, to describe the audit findings.
- 10.2.7. The CAB shall provide an audit meeting log summarizing the opening and closing meetings. The opening meeting should cover the following points, led by the auditor:
  - i. introduction
  - ii. confirmation on scope and data that has already been submitted
  - iii. confirmation of the audit plan
  - iv. explanation of the audit type and process
  - v. confirmation from the producer or producer group that all documentation is available, and the auditor will get access to all information related to the audit process
- 10.2.8. For the closing meeting the following points should be presented and their successful delivery should be acknowledged by auditor and producer representative signatures:
  - i. review of contact information
  - ii. explanation of report review process up to verification statement issuance
  - iii. producers' obligation to report /register to CAB and SRP platform any changes to the scope, ownership, address or management system
  - iv. audit result, including a list of identified non-compliances and OFIs.

# 10.3. Exceptions

- 10.3.1. In extraordinary circumstances an exception to the requirements of this assurance process may be necessary. Extraordinary circumstances could include situations such as:
  - i. civil unrest
  - ii. an issue of health or safety which cannot be mitigated
  - iii. extreme weather events



- iv. exceptional and unpredictable social and environmental situations, for example pandemics.
- 10.3.2. In the event of an extraordinary circumstance identified prior to the audit, the CAB shall inform SRP and request a variance to any requirements of this assurance process which are not able to be implemented. Exceptions and mitigating actions must be approved by SRP prior to implementation. Potential mitigating actions include:
  - i. conducting the audit remotely;
  - ii. postponing the audit and/or extending the expiry date of a verification:
  - iii. delaying assessment of some components of the standard;
  - iv. altering the sampling strategy.
- 10.3.3. In pre-audit situations where exceptions and mitigating actions are not approved in advance of the audit SRP may request corrective action by the CAB, at the CAB's expense.
- 10.3.4. In the event of extraordinary circumstances identified during an audit, the CAB may need to make an immediate decision, with prior notification to SRP not possible. In these circumstances:
  - i. the CAB shall inform SRP as soon as possible of the extraordinary circumstance, the exception made, and any mitigating actions taken.
  - ii. SRP will determine if additional mitigating actions are required, and an agreement to how the cost of the additional mitigating action will be covered is required.
  - iii. The implications for verification shall be discussed with SRP before the audit report is prepared.
  - iv. Verification remains possible so long as the exceptional circumstance was not controllable by the producer or producer group or CAB.

## 10.4. Auditor requirements

- 10.4.1. To provide third-party audits, auditors must be employed or contracted by an approved CAB.
- 10.4.2. Auditors are required to:
  - i. Conduct assessments of producers or producer groups to determine compliance or otherwise with the SRP Standard.



- ii. Be up to date with SRP developments, tools, issues and legislative changes when applicable.
- iii. Strictly observe producers' and CAB procedures to maintain confidentiality of all records.
- iv. Write timely and accurate audit reports.
- 10.4.3. The CAB must have a system in place to guarantee that auditors comply with the following minimum set of requirements to assess compliance with the SRP Standard:
  - i. Educated in an agricultural/crop-based discipline (forestry is also acceptable). A background in sustainability, social and environmental concerns would also be an advantage.
  - ii. A minimum 1 year of experience of auditing comparable responsible/sustainable crop production.
  - iii. Participated in a formal SRP training or trained by the CAB inhouse trainer.
  - iv. Attended an auditor training course based on ISO 19011 principles, with at least 2-day duration.
  - v. Successfully completed the SRP online test before conducting an SRP audit. The SRP Capacity Development Manager must monitor the genuineness and the completeness of the online test.
  - vi. Retrained or requalified immediately whenever there is any major revision to the SRP Standard and/or SRP Assurance Scheme.
  - vii. Appropriate language skills for auditing (local working language) and report writing skills that match at least one of the official translations of the SRP Standard (preferably English).
  - viii. The following personal attributes, which the CAB must verify during the witnessing of each auditor and in the sign-off process:
    - Ethical (fair, truthful, sincere, honest, tactful and discreet)
    - Observant (continuously aware of physical surroundings and activities)
    - Perceptive (instinctive, aware of and able to understand situations)
    - Versatile (adjusts readily to different situations)



- Decisive (timely conclusions based on logical reasoning)
- Integrity (practices confidentiality and observes professional code of conduct).
- 10.4.4. CABs must have a program for continuous assessment of the auditing skills of every Auditor. This program must include:
  - i. Before qualifying as an auditor:
    - The applicant auditor must participate as an observer in a minimum of one individual producer or one producer group audit; AND
  - ii. After qualification:
    - The auditor must be witnessed by a qualified auditor on the first occasion when they lead a SRP onsite audit of at least one individual producer or one producer group.
    - Every four years the auditor must be witnessed by the CAB in-house trainer or other qualified auditor who has attended a formal SRP training course.
- 10.4.5. Auditors must inform the CAB when their independence or impartiality may be affected (or potentially perceived to be so) while carrying out any SRP-related activities. They are prohibited from accepting bribes or other inducements and must not have carried out consultancy activities within the previous two years for any producers they are auditing.



#### 11. SAMPLING DURING AN AUDIT

#### 11.1. Application

11.1.1. Sampling will be used during a third-party assessment within a producer group, or an individual producer with multiple farms/plots.

#### 11.2. Intent

11.2.1. The intent of sampling is to reduce cost while not significantly impacting on the likelihood of identifying any NCs that may be present.

#### 11.3. Sampling approaches

- 11.3.1. Sampling may be any combination of:
  - i. Stratified, to ensure a more representative sample, i.e. the farms, plots or producers are categorized into similar types and then sampling takes place within each category. Where relevant, samples should encompass a diverse range of rice production types, including those utilizing rainfall systems, irrigation systems, and other methods. Categories shall be selected to minimize variability within each category.
  - ii. **Randomized**, to ensure an even likelihood of any unit being sampled.
  - iii. **Purposive** to focus attention on units believed to have a greater likelihood of having an NC, or to increase the likelihood (or ensure) that different units are sampled at each audit from those sampled previously.

Not all these approaches may be possible at any one audit.

# 11.4. Reporting on sampling approach

- 11.4.1. The CAB is required to consider and document the approach chosen, including a clear description of its rationale for sample size and sample selection in the audit report.
- 11.4.2. CABs are also encouraged to provide feedback on the implementation and possible implications of the approach chosen to be used as reference for future assessment.



#### 11.5. Sample sizes

- 11.5.1. In the case of producer groups, or individual producers with multiple farms/plots, where third-party assessment includes a sampling of producers or of farms/plots method, the basic sample size is the square root (rounded up) of the number of group members registered or of farms/plots.
- 11.5.2. The size of the sample of group members to be audited may be increased or decreased based on a number of risk factors, such as those in Section 11.6. However, for initial audits, the minimum sample size must never be below the square root of the number of registered group members or farms/plots, and for subsequent audits never below 50% of the square root of the number of registered group members or farms/plots. Refer to the tables in Section 11.7 (examples of allowed sample sizes).
- 11.5.3. Sample sizes may also be increased during an audit, at the auditor's discretion e.g. visiting additional farmers in order to determine the extent of a potential non-conformity.
- 11.5.4. In order to allow reduction of sampling size, the minimum score in IMS audit shall be either:
  - i. 75% with no missed threshold in the preceding audit, or
  - ii. 85% with no more than 1 missed threshold in the preceding audit.

#### 11.6. Risk factors influencing sample size

- 11.6.1. Factors that a CAB may consider in determining sample size include the following.
  - i. Non-compliances detected in the IMS.
  - ii. Results of previous assessments including compliance scores.
  - iii. The number and nature of stakeholder complaints.
  - iv. The speed and nature of a client's response to previous NCs.
  - v. The presence of land with High Conservation Value within or adjacent to the clients farmed land.
  - vi. Land use or tenure disputes.
  - vii. Proximity of conflict zones.
  - viii. Known sustainability issues or labour violations in a specific region.
  - ix Farm size



- x. Changes of farm location and/or management.
- xi. Significant differences between the results of internal, self-assessments and third-party assessments.
- xii. Extraordinary climatic conditions.
- xiii. Increase or decrease of estimated production volume, or group members or number of farms/plots.
- xiv. Changes in the client's management systems.
- xv. Changes in product technology.

## 11.7. Examples of allowed sample sizes

- 11.7.1. The following tables illustrate allowed sample sizes.
  - X = the number of the number of registered group members or farms/plots.
  - √ = square root

Allowed sample size	Initial audit	Subsequent audit
Basic sample size √X rounded up		√X rounded up
Minimum sample size (IMS <75%)	√X rounded up	√X rounded up
Minimum sample size (IMS ≥75% or IMS ≥85 with 1 missed threshold in preceding audit)	√X rounded up	50% √X rounded up
Maximum sample size	100%	100%

So, *for example* if there are 15 registered group members or farms/plots, the following applies:

Allowed sample size (X=15)	Initial audit	Subsequent audit
Basic sample size	4	4
Minimum sample size (IMS <75%)	4	4
Minimum sample size (IMS ≥75% or IMS ≥85 with 1 missed threshold in preceding audit)	4	2
Maximum sample size	15	15

Or, *for example* if there are 1200 registered group members or farms/plots, the following applies:

Allowed sample size (X=1200)	Initial audit	Subsequent audit
Basic sample size	35	35
Minimum sample size (IMS <75%)	35	35
Minimum sample size (IMS ≥75% or IMS ≥85 with 1 missed threshold in preceding audit)	35	18
Maximum sample size	1200	1200

Note: in all cases the CAB shall justify and document the sampling strategy (stratified, randomised or purposive or a combination) and sample size chosen.



#### 12. AUDIT REPORTING

#### 12.1. General provisions

- 12.1.1. The audit report results in an overall score of compliance with the SRP Standard and lists non-compliances; together these helps identify gaps and training needs.
- 12.1.2. The CAB must use an SRP-approved audit report and checklist template, specifying all required information.
- 12.1.3. Audit reports may be written in any language for which an official translated SRP Standard is available. Full audit reports, and summaries of reports in English, must be provided to SRP in a format compatible with the SRP Assurance Platform to enable global data management and reporting.
- 12.1.4. In the case of non-compliances and missed thresholds identified by the auditor, clear and concise details of the non-compliances must be recorded in the audit report.
- 12.1.5. A digital copy of the audit report (in any language for which an official SRP translation of the Standard exists) must be made available to SRP on the SRP Assurance Platform. The audited producer or producer group shall be provided with a copy of the audit report.
- 12.1.6. Final reports, verification statements and final verification correspondence, shall be forwarded to SRP.

#### 12.2. Audit reports

- 12.2.1. CAB auditors must provide detailed information in their SRP audit reports. Producers' personal data may be anonymized in order to comply with applicable data protection rules. The minimum reporting requirements are:
  - i. Version of the SRP Standard used.
  - ii. Date of audit.
  - iii. Whether the audit is scheduled or unannounced.
  - iv. Audit team and team member qualifications, including names and affiliations of any interpreters and technical experts used.
  - v. Producer or producer group names and GPS location.
  - vi. Audit duration.
  - vii. List of audited farms/plots.
  - viii. Yields and varieties for each farm/plot.



- ix. Identification of off-takers (for traceability or Chain of Custody).
- x. Any sampling strategies employed, rationales for risk-based samples and associated comments.
- xi. Satisfactory evidence that all areas within the scope have been fully and properly assessed.
- xii. Audit scores (producer's score for individual producer, for producer group or individual producer with multiple plots, the average producer score and IMS score).
- xiii. Audit decision, list of all non-compliances.
- xiv. List of raised appeals and documented response.
- xv. Any exceptional circumstances and mitigating actions taken by the CAB.
- xvi. Any errors of fact provided by the producer or producer groups and a rationale for why they have been accepted or not accepted.
- xvii. Signature of auditor and producer or assigned individual for producer group. The producer or assigned individual may sign the audit report after the closing meeting in conformity with any observations raised by the CAB auditor.

## 12.3. For producer groups, additional requirements are as follows:

- i. Office location.
- ii. Number of producers to be sampled.
- iii. List of group members indicating farm locations and farm areas.
- iv. Documentation of producer group training history.
- v. Assessment result of producer group management system's internal risk register (if applicable).

## 12.4. Audit reporting and response schedule

- 12.4.1. A table setting out the schedule for various aspects of report production and follow-up is provided at the end of this section.
- 12.4.2. Newly registered producers or producer groups that do not keep to this schedule will fail their verification and will need to undergo another round of assessment should they wish to achieve verification subsequently.



- 12.4.3. Following the completion of an audit the CAB auditor shall, within 21 days, complete a draft report describing the producer's or producer group's performance against each of the requirements for the component(s) against which they have been assessed. After review by the CAB reviewer, the report will make a recommendation on verification within 7 days. The draft assessment report will be sent to the producer or producer group for comment, to check that it is factually correct, and the producer or producer group is satisfied with the content.
- 12.4.4. The producer or producer group shall comment on any factual inaccuracies within 7 calendar days from when they receive the report.
- 12.4.5. The CAB shall provide the final audit report, update the SRP Assurance Platform, and send it to producer or producer group within 7 calendar days of receiving their comments. Then, the CAB is ready to issue the verification statement.

## 12.5. Additional schedule requirements where NCs are found

- 12.5.1. If the audit report includes non-compliances, CAB shall provide the final audit report, update the Assurance Platform, and send it to producer or producer group within 7 calendar days. Then, the producer or producer group could work on the Root Cause Analyses (RCAs) and prepare the Corrective Action Plans (CAPs). The following schedule shall apply:
  - The producer shall provide root cause analyses (RCAs) and corrective action plans (CAPs) for any non-compliances within 28 calendar days from when they first receive the final audit report.
  - ii. The CAB auditor shall assess any RCAs and CAPs and the CAB shall indicate acceptance or otherwise within 14 calendar days after receipt.
  - iii. For NCs for which evidence of corrective action can be validated immediately the producer or producer group shall provide evidence of corrective actions within 21 calendar days of acceptance of any CAP.
  - iv. Within 14 calendar days of receipt of the evidence, the CAB auditor shall assess evidence of corrective actions, the CAB reviewer shall indicate acceptance or otherwise, and the CAB's decision-making entity, who has the authority to award the verification statement under contract agreement with SRP, shall finalize the audit report (incorporating any clarifications agreed through the process of review with the client), update the SRP Assurance Platform and send the audit report to the SRP and the producer or producer group.



v. A verified producer or producer group that does not keep to this schedule will have their verification suspended and will then need to resolve any non-compliances within three months after they receive suspension notification to avoid withdrawal of verification

# 12.6. Consequences of non-conformities for which evidence can only be validated in the next appropriate production season.

- 12.6.1. For NCs for which evidence can only be validated in the next appropriate production season:
  - i. if the NC relates to a mandatory compliance threshold, then a verification statement cannot be issued until the NC is closed.
  - ii. if the NC relates to any other threshold, then a verification statement can only be issued when the CAB has approved a RCA and CAP for all such NCs.
  - iii. If at the next seasonally-appropriate audit the CAB still cannot close such NCs then a verification statement cannot be issued and verification must be suspended. In other words, if evidence for implementation of the producer's or producer group's CAP is insufficient the verification statement cannot be carried forward for a further season.

Consequences of NCs for which evidence can only be assessed during the next appropriate season				
Type of	Type of NC			
audit	Relating to mandatory threshold	Relating to non-mandatory threshold		
Initial	No verification can be issued until positive subsequent assessment outcome.	No verification can be issued until positive subsequent assessment outcome.		
Subsequent	Verification suspended. Verification can only be reinstated following positive subsequent assessment outcome.	Verification retained, but if CAP and evidence are not approved at next assessment, verification will be suspended.		



Audit report and response schedule			
Responsibility	Action	Maximum calendar days	<u>Maximum</u> elapsed days after last day of audit
CAB Auditor	Produce draft audit report	21	21
CAB Reviewer	Review and approve before send to producer/ producer group	7	28
Producer/ producer group	Check and comment on any inaccuracies	7	35
	If NO NCs in the a	audit report	
САВ	Finalise audit report, update SRP platform and send final report to SRP and producer/ producer group	7	42
	If NCs in the au	dit report	
CAB	Finalise audit report, update SRP platform and send final report to producer/ producer group to build Root Cause Analyses (RCAs) and Corrective Action Plans (CAPs)	7	42
	For immediately auditable I	NCs in the au	dit report
Producer/ producer group	Provide RCA and CAP	28	70
CAB Reviewer	Review and agree CAP	14	84
Producer/ producer group	Provide evidence of corrective action	21	105
CAB Reviewer	Review and approve evidence	14	119
CAB	Finalise audit report, update SRP platform and send final report to SRP and producer/ producer group	7	126
	For only-seasonally-auditable	NCs in the	audit report
Producer/ producer group	Provide RCA and CAP	28	70
CAB Reviewer	Review and agree CAP	14	84
Producer/ producer group	Provide evidence of corrective action	At next audit will be reviewed during audit process	
CAB	Finalise audit report, update SRP platform and send final report to SRP and producer/ producer group	7	91



#### 13. VERIFICATION DECISIONS AND APPEALS PROCEDURE

#### 13.1. Verification decisions

CABs must comply with the following minimum SRP requirements relating to issue of verification statements.

- 13.1.1. The CAB must have a clearly defined system in place for the granting, suspension and withdrawal of verification statements by the CAB for the scope of the SRP Standard.
- 13.1.2. Whenever a NC has been identified, the Producer or Producer Group must carry out a RCA and develop a CAP. The CAB must verify the Corrective Action Plan (CAP) via further on-farm/plot assessment or scrutiny of submitted documentation including updated procedures, records and photographs assessed by a technically competent member or group within the CAB.
- 13.1.3. All evidence of necessary improvement (passing all necessary thresholds) must be returned, completed and verified by the CAB, within the timescale defined in this document, before the NC can be closed. Only then can a SRP Verified claim be awarded (see Claims and Conditions in SRP Standard).
- 13.1.4. Each third-party audit report must be reviewed by a CAB Reviewer prior to granting verification. This person shall take the final decision to grant the verification. The CAB Reviewer must not be the same person who carries out the audit. This review and decision process cannot be outsourced.
- 13.1.5. The CAB must inform the producer or producer group and enter the verification decision in the SRP Assurance Platform within the schedule defined in this document.
- 13.1.6. To ensure that a CAB's Reviewer is able to conduct a transparent and comprehensive review of field auditors' reports, the following requirements must be fulfilled:
  - i. Reviewers are impartial and technically capable of understanding the content of reports.
  - ii. Reviewers must comply at least with SRP auditor requirements.
  - iii. All applicable requirements of the SRP Standard have been fully covered.
  - iv. The scope of the report covers the SRP Standard, and the report provides satisfactory evidence that all areas within the scope have been fully investigated.
  - v. All non-compliances have been identified, CAP has been agreed with the CAB for each, and sufficient evidence of corrections provided to address all non-compliances.



## 13.2. Verification decision details

- 13.2.1. Verification statements will be issued by the CAB and shall include the following details:
  - i. Producer or producer group's name and address.
  - ii. Audit scope.
  - iii. Score obtained.
  - iv. Claim permitted.
  - v. Verification statement number.
  - vi. Issue date.
  - vii. Expiry date.
  - viii. Signature of an appropriate signatory of the issuing CAB.
  - ix. Branding to indicate the CAB and SRP, according to agreement between SRP and the CAB.
  - x. Number of producers.
  - xi. Production area.
  - xii. Variety.

#### 13.3. Conditions of verifications

- 13.3.1. The verification is valid for 36 months, but an annual assessment shall be conducted at the latest sixteen months (one year plus the maximum audit window refer to Section 7.6.4). If the annual assessment window is missed, this will result in suspension, and verification may be withdrawn at any time should evidence become available to demonstrate the producer or producer group is no longer compliant with the Assurance Scheme.
- 13.3.2. The producer or producer group shall be sent a copy of the verification statement.
- 13.3.3. Verification statements are not transferable between producers or producer groups. When a verified producer or producer group merges with, acquires or is acquired by another company, the verification cannot be transferred to the new producer or producer group. A new assessment shall be arranged as the organization and ultimate beneficial owner will have changed.
- 13.3.4. The producer or producer group may show their verification statement to customers to show that they have passed the general requirements of the standard.



## 13.4. Suspension and withdrawal of verifications

- 13.4.1. Verifications shall be suspended by the CAB under the following circumstances:
  - i. a finding of non-conformance during an assessment that is not resolved within the stipulated timeframe, or
  - ii. not meeting the terms and conditions of verification, or
  - iii. an audit report cannot be completed within the stipulated timeline due to delayed responses from the producer or producer group.
- 13.4.2. A suspended verification shall be re-instated when the reasons for suspension have been rectified to the satisfaction of the CAB i.e. to meet the terms of the standard within the stipulated timelines.
- 13.4.3. Verifications will be withdrawn by the CAB under the following circumstances:
  - i. any reason for suspension is not rectified within 3 months, or
  - ii. an investigation by the CAB into a suspected serious breach of the standard or the terms and conditions of verification confirms that breach.
- 13.4.4. Where a verification has been withdrawn, to become verified again, the producer or producer group must be re-assessed by the CAB. The producer or producer group should first satisfy themselves via the internal assessment tool that they have rectified the reason(s) for withdrawal.
- 13.4.5. The CAB shall notify SRP of a change in the status of a verification within 7 calendar days and update the SRP platform accordingly.

#### 13.5. Appeals procedure.

- 13.5.1. The CAB must establish a clearly defined and publicly available appeals procedure and ensure its clients are fully aware of the appeal process.
- 13.5.2. Any complaint or appeal against a CAB must follow the CAB's own complaints and appeals procedure.
- 13.5.3. In case the CAB does not respond adequately, the producer or producer group may elevate the complaint to SRP and follow SRP's appeals procedure.