AUDIT EXCEPTION POLICY FOR COVID-19
MARCH 2020 REVISED 17 MARCH, 30 MARCH, 8 MAY, 24 JULY, 23 SEPTEMBER AND 4 DECEMBER 2020

RAINFOREST ALLIANCE

SUMMARY

Issue Date:	Binding date:	Expiration date:
March 7, 2020 Revised 17 March, 30 March, 8 May, 24 July, 23 September and 4 December 2020	March 7, 2020 For Current revision 26 November, 2020	June 30, 2021

Developed by:	Approved by:
• Rainforest Alliance	• Director, Standards and Assurance

Linked to (code and name of documents, if applicable):	
UTZ related documents • UTZ Assurance Certification protocol, version 4.3 December 2018 • UTZ Code of Conduct for individual and multi-site certification, version 1.1 + relevant crop annexes • UTZ Core Code of Conduct for group and multi-group certification, version 1.1 + relevant crop annexes • Chain of Custody Standard + relevant crop annexes	Rainforest Alliance related documents • RA Certification Rules, July 2020 version 2.1 • RA Chain of Custody Policy 2015 • Rainforest Alliance Sustainable Agriculture Standard, July 2017 version 1.2

Reporting to RA
CBs are required to request approval from Rainforest Alliance via certification@ra.org before putting this policy in place for desk audits, remote audits and certificate/license extensions. RA reserves the right to review all extensions of certificate/license validity and volume allocation and remote audit decisions and respond accordingly. Please use the relevant COVID-19 template for these requests. The template can be found on the RA Website here

Applicable to:
Rainforest Alliance authorized Certification Bodies (CB) as well as Farm and Chain of Custody certified entities (for both UTZ and Rainforest Alliance programs). However, a number of country specific policies supersede the current policy and may implement different rules. Some sections of this policy are not applicable in certain countries – as indicated in the sections below.

Regions:
All regions subject to public health and mobility restrictions due to COVID-19 according to information from the public health authorities for that country and where it is impossible to conduct onsite audits following the normal audit cycle. This policy may therefore be applicable in full in countries where there are still travel restrictions, and only partly in others where restrictions have eased. CBs making use of this policy must check updates of restrictions in force in the relevant country.

Crops:	Type of organizations:
All	Farm and Chain of Custody entities

MAIN CHANGES FROM VERSION OF 23 SEPTEMBER 2020

The table below summarizes the main changes in this version of the policy from the previous version published on 23 September 2020

Summary Table		
Pg	**Clause**	**Change**
Summary		
2	Linked to (code and name of documents, if applicable)	Clarification RA Certification Rules, July 2020 version 2.1 (previously July 2017, version 1.2)
Justification		
5	2.1	Valid for audits against the current RA and UTZ programs that need to take place before 30 June 2021(previously 31 December 2020)
5	2.1	Clarification that this policy is now aligned with the Transition Rules.
5	2.1	Clarification that all Certificate Holders need to be audited against the 2020 Certification Program as at 1 July 2021. And to avoid disruption of the transition to the new standard, license extensions issued under the COVID policy before 31 March 2021 cannot exceed a final date of 30 June 2021. (previously 31 March 2021)
5	2.1	Clarification that there will be no further extension or modification of this policy.
5	2.1	Clarification that this policy only applies in cases where onsite auditing is still not possible (with sufficient evidence), and that partial and fully remote audits can be conducted until 30 June 2021. (previously 31 December 2020)
5	2.1	Advice to conduct all remaining audits on the existing programs as soon as possible for those Certificate Holders that must transition between July – December 2021, to avoid that they need 2 different audits back to back. No exceptions will be given if this happens due to poor planning.
Chain of Custody		
6	2.2 c)	An extension of license/certificate is allowed up to 30 June 2021 (previously 31 March). All pending audits must have their closing meeting conducted before 30 June 2021 (previously 31 December 2020) to allow for new certificates to be issued as soon as possible thereafter.
6	2.2 c)	Clarification that pending desk and on-site audits refers to those that could not be fully completed due to COVID-19
6	2.2 d)	Addition that If a desk audit is feasible it shall take place no later than 30 June 2021 to allow for enough time to issue a certificate prior to the new program. And that this is now also aligned with the Transition Rules.
6	2.2 e)	Addition that needs to align with clause d above.

UTZ Code of Conduct and RA SAS 2017 Farm Standard		
7	2.3 a)	Clarification RA Certification Rules, July 2020 version 2.1 (previously July 2017, version 1.2)
7	2.3 b)	Certificates expiring on or before 31 March 2021 (previously 31 October), may be granted a license extension until 30 June 2021 (previously 31 March). The closing meeting of all audits must be conducted by 30 June 2021 (previously 31 December 2020)
7	2.3 b)	Addition that Certificate Holders who receive an audit under the conditions of this Policy between January and June 2021, and whose transition audit needs to take place between July – Dec 2021 may therefore receive two audits in the same calendar year. For this reason, Certificate Holders and CBs are encouraged to schedule audits extended under this Policy as soon as possible to allow Certificate Holders enough time to be trained and prepare for the transition audit against the new standard.
7	2.3 c)	DELETED: Certificate Holders must maintain an annual cycle and schedule the next audit no later than 12 months following the audit REPLACED with: Certificate Holders must maintain an annual cycle and schedule the audit for the closing meeting to be held no later than 30 June 2021.
7	2.3 d)	NEW: Current Rainforest Alliance Certificate Holders whose audit cycle timing has been disrupted due to COVID and who, according to RA certification rules, must now schedule two audits within less than 6 months of each other, will be allowed to combine two audits only until 30 June 2020. Conditions under which this may happen are also further clarified.
8	2.3 e)	Previously 2.3 d). Clarification that the remaining 50% volume can be given when the final part of the audit is done, be it on-site/partially remote or fully remote. Addition that volume extensions can apply for the 2020 harvest as well as the 2021 harvest periods which fall between January and June 2021
8	2.3 f)	Previously 2.3 e)
8	2.3 g)	Previously 2.3 f)
8	2.3 h)	Previously 2.3 g). Clarification that pending on-site audits are those that could not be fully completed due to COVID-19. And that these audits must be conducted with the closing meeting taking place no later than 30 June 2021 (previously 31 December 2020). Verification Audits may be conducted as long as the final certification decision is made by 30 June 2021 (previously 31 March 2021).
9	2.3 i)	Previously 2.3 h)
9	2.3 j)	Previously 2.3 i)
9	2.3 k)	Previously 2.3 j)
9	2.3 l)	Previously 2.3 k)
9	2.3 m)	Previously 2.3 l). Clarification that the Policy for Certification in India (latest version) applies for Assam and includes a link to the Policy.
9	2.3 n)	Previously 2.3 m)
9	2.3 o)	Previously 2.3 n)
10	2.3 p)	Previously 2.3 o)

1. INTRODUCTION

Rainforest Alliance is a growing network of people who are inspired and committed to working together to achieve our mission of conserving biodiversity and ensuring sustainable livelihoods. For more information about Rainforest Alliance, visit its website: http://www.rainforest-alliance.org.

2. POLICY FOR AUDIT EXCEPTIONS DUE TO COVID-19

2.1 JUSTIFICATION

Currently, due to restrictions on travel and access to certain sites due to public health risks related to COVID-19 (Coronavirus), cases are arising in some localities where it is not possible to follow the planned schedule of audits in the annual audit cycle. Rainforest Alliance considers this to be a situation of force majeure which affects the normal implementation of our certification program. For this reason, a specific policy has been developed to govern exceptions arising from disruptions to audit activities due to COVID-19 or public health measures imposed by the authorities in the country of operation. This procedure is in effect as of 7th March 2020. This is a temporary measure which is currently valid for audits against the current RA and UTZ programs that need to take place before 30 June 2021. This policy is therefore now aligned with the Transition Rules. From the 1st July 2021, all Certificate Holders need to be audited against the 2020 Certification Program. To avoid disruption of the transition to the new standard, license extensions issued under this Policy before 31 March 2021 cannot exceed a final date of 30 June 2021. There will be no further extension or modification of this policy.

Certificate Holders and Certification Bodies are encouraged to plan for and conduct audits as soon as possible. Only in cases where onsite auditing is still not possible (with sufficient evidence), partial and fully remote audits can be conducted until 30 June 2021. However, to limit the impact on Certificate Holders who need to transition to the 2020 Certification Program from July – December 2021, Certification Bodies and Certificate Holders are required to plan the remaining audits on the current programs to allow enough time for Certificate Holders to plan for their transition. For these Certificate Holders, we strongly advise that all remaining audits take place in Q1 2021, otherwise there is a real risk that they will have 2 audits back to back and no exceptions will be granted as per the Transition Rules. The CB should continue to use the template to request full remote audits with sufficient justification. **This clause is not applicable to Certificate Holders in Cote d'Ivoire or Ghana or India (Assam).**

2.2 POLICY FOR CURRENT UTZ AND RA CHAIN OF CUSTODY STANDARDS

a) All rules in the current certification document apply and continue to be mandatory (UTZ Assurance Certification protocol, version 4.3 December 2018 and RA Chain of Custody Policy.

b) For existing Certificate Holders, where it is not possible for an Auditor to conduct an in-person audit, Rainforest Alliance authorizes CBs to carry out remote CoC audits of Participating Operators (CoC POs). These will replace the onsite audits required for the current audit cycle per the relevant certification documents.

c) For existing Certificate Holders where a desk audit is also not possible, an extension of license/certificate is allowed up to 30 June 2021. All pending desk and on-site audits (i.e. those that could not be fully completed due to COVID-19) must have their closing meeting conducted before 30 June 2021 to allow for new certificates to be issued as soon as possible thereafter. This applies to all audits including RA surveillance and verification audits. Once the surveillance/verification audit has been completed the CB should indicate in Salesforce that the delay was due to COVID-19. **This clause is not applicable to Certificate Holders in Cote d'Ivoire or Ghana or India (Assam).**

d) New Certificate Holders are those that either have never had UTZ or Rainforest Alliance certification or did not have a valid certificate/license as of 31 December 2019. New Certificate Holders are permitted to enter the program based on a desk audit now, followed by an on-site audit when feasible. The desk audit does not eliminate the need for the on-site audit. It is the responsibility of the CB and the new Certificate Holder to determine when it is safe to conduct an on-site audit following local and national COVID-19 health and safety recommendations set forth by the origin of the CB and the new Certificate Holder. If a desk audit is feasible it shall take place no later than 30 June 2021 to allow for enough time to issue a certificate prior to the new program as laid out in the Transition Rules. This also applies to entities that were once audit exempted/endorsed and no longer fall into that category. The certificate and/or license will be issued as a result of the desk audit.

e) For entities who had a valid certificate on or after January 1, 2020 and that certificate has been cancelled, a desk audit can be conducted to initiate a new certification cycle. This is not considered a new certification. Entities that did not have a valid certificate on or after 31 December 2019 are required to conduct an on-site audit to initiate a new certification cycle in line with clause d above.

f) Rainforest Alliance reserves the right to insist on an on-site audit for companies as needed. In this case an extension of the existing licence may be granted to cover the period until an on-site audit can be conducted.

2.3 POLICY FOR CURRENT UTZ CODE OF CONDUCT AND RA SAS 2017 FARM STANDARD

a) All rules in the current certification document apply and continue to be mandatory (UTZ Assurance Certification protocol, version 4.3 December 2018 and RA Certification Rules, July 2020 version 2.1).

b) Existing Certificate Holders with certificates expiring on or before 31 March 2021, may be granted a license extension until 30 June 2021. Audits must have their closing meeting conducted by 30 June 2021 to allow for new certificates to be issued according to the Transition Rules. This means that after 30 June 2021, there will be no possibility to conduct RA verification audits or other physical checks to close outstanding non-conformities. Certificate Holders and CBs should take this onto account in their planning. Certificate Holders who receive an audit under the conditions of this Policy between January and June 2021, and whose transition audit needs to take place between July – Dec 2021 may therefore receive two audits in the same calendar year. For this reason, Certificate Holders and CBs are encouraged to schedule audits extended under this Policy as soon as possible to allow Certificate Holders enough time to be trained and prepare for the transition audit against the new standard. **This clause is not applicable to Certificate Holders in Cote d'Ivoire or Ghana or India (Assam).**

c) Certificate validity extensions may change the dates of the current audit cycle. However, Certificate Holders must maintain an annual cycle and schedule their audit for the closing meeting to be held no later than 30 June 2021. **This clause is not applicable to Certificate Holders in Cote d'Ivoire or Ghana or India (Assam).**

d) Current Rainforest Alliance Certificate Holders whose audit cycle timing has been disrupted due to COVID and who, according to RA certification rules, must now schedule two audits within less than 6 months of each other, will be allowed to combine two audits only until 30 June 2021 under the following conditions:

   i.   The 1st surveillance audit can be combined with the 2nd surveillance audit. The Certificate Holder must comply with the Criteria, Performance Level and Minimum Compliance Percentage per Level and Year applicable for a 2nd surveillance audit.

   ii. The 2nd surveillance audit can be combined with a re-certification audit. The Certificate Holder must comply with the Criteria, Performance Level and Minimum Compliance Percentage per Level and Year applicable for a re-certification audit.

   iii. Certificate Holders that had a surveillance audit (on site or remote) after August 2020 and who are still undergoing harvest/processing activities, and who need to receive a Certification Audit less than 6 months after the surveillance audit was conducted, may be granted a time extension and be allowed to conduct the closing meeting of the Certification Audit by latest 30 June 2021. The Certification Body should request this exception to Rainforest Alliance by e-mail with evidence that the CH is still undergoing

processing/harvest activities. For Certificate Holders who <u>must have their transition audit between July – Dec 2021</u> according to the Transition Rules we strongly advise to schedule the remaining audit as early as possible to allow as much time as possible for the preparation of the Transition Audit.

iv. When two audits are combined (as in the options above), <u>the CB shall inform the Certificate Holder that these audits are combined and ensure they know which level to comply with before the audit takes place</u> to avoid unnecessary nonconformities.

v. When two audits are combined (as in the options above), the CB must also inform RA via cbcert@ra.org. Both engagements must be entered in Salesforce including an explanation of which audits have been combined and this must be entered in the section "Additional Information" for both engagements.

e) License extensions may be granted for a maximum of 50% additional certified volume. The additional authorized volume of 50% will be based on the current approved volume and will be deducted from the total volume certified when the in-person/partial remote/fully remote audit takes place. The final authorized volume for the certificate will be verified during the audit. The CB must indicate the total amount verified and approved in the report and certificate / license. Volume extensions will be allowed as per this Policy and applies to the 2020 harvest as well as the 2021 harvest periods which fall between January and June 2021. **This clause is not applicable to Certificate Holders in Cote d'Ivoire or Ghana or India (Assam).**

f) Expansion of volume beyond a maximum 10% volume extension and a maximum 10% growth in group members can only be granted following either a remote or an onsite audit. A CB can allow for more than 10% growth of group members, only if internal inspections have taken place on all additional new members and the CB is satisfied with the proof provided. CBs must inform RA of requested extensions of growth of group membership and volume using the template provided [here.](#) **Group membership growth beyond 10% is not permitted in Certificate Holders in Cote d'Ivoire or Ghana or India (Assam).**

g) New Certificate Holders are those that either have never had UTZ or Rainforest Alliance certification or did not have a valid certificate/license as at 31 December 2019. No certifications will be issued for new farm operations without an on-site certification audit using the normal procedure. Members who had a valid certificate on or after January 1, 2020 and that certificate has been cancelled, suspended, and/or received a non-certification decision, will need to receive an onsite audit using the normal procedure, if they wish to apply for recertification. **This clause is not applicable to Certificate Holders in Cote d'Ivoire or Ghana or India (Assam).**

h) All pending on-site audits (i.e. those that could not be fully completed due to COVID-19), including RA surveillance audits, must be conducted with the closing meeting taking place no later than 30 June 2021. Verification Audits may be conducted as long as the final certification decision is made by 30 June 2021. Once the surveillance/verification audit has been completed

the CB should indicate in Salesforce that the delay was caused by COVID-19. **This clause is not applicable to Certificate Holders in Cote d'Ivoire or Ghana or India (Assam).**

i) Requests by CBs to carry out remote audits for existing farm level certification will be reviewed case by case. Remote audits – either fully remote or partially remote, must be carried out in conformity with the *Rainforest Alliance Guidance on conducting Remote Audits*.

j) When conducting onsite audits or an onsite verification as part of a partial remote audit, auditors and Certificate Holders must take full precautions to comply with public health measures to stop the spread of COVID-19. These include respecting social distancing, regular hand washing, wearing of masks that cover the mouth and nose, and any other measures mandated by the relevant national or local authorities. Auditors must respect measures put in place by Certificate Holders to protect staff and workers from the risk of the spread of infection.

k) CBs must inform and agree with Certificate Holders the measures they will implement to limit the risk of the spread of COVID-19 when they propose an audit date and/or audit plan involving any onsite visit. CBs are responsible for ensuring that auditors implement these measures effectively.

l) **For Certificate Holders in Cote D'Ivoire and Ghana** partial remote audits may be conducted where it is not possible for auditors to conduct onsite audits immediately. Partial remote audits must be carried out in conformity with the *Rainforest Alliance Guidance on conducting Remote Audits*. A certificate may be issued based on the remote part of the audit with a volume allocation determined by the risk level of the Certificate Holder. CBs will be informed of the risk level during the audit allocation process. The volume allocation may be adjusted once the onsite audit has been performed. Onsite audits conducted as part of partial remote audits must be completed by 30 September 2020.

m) **For Certificate Holders in India (Assam)** the [Policy for Certification in India](#) (latest version) applies.

n) For Short-Harvest Window crops for which the harvest window falls within the validity of this policy, a fully remote audit is possible if the harvest season will finish within the validity of this policy. Fully remote audits must be carried out in conformity with the *Rainforest Alliance Guidance on conducting Remote Audits*. The auditor must assess compliance with the internal inspection carried out by the certified organization before making the certification decision. The CB has the right to charge for these services. The following audit in the audit cycle should be semi-announced or unannounced. **This clause is not applicable to Certificate Holders in Cote d'Ivoire or Ghana or India (Assam).**

o) CBs are not obliged to conduct the proportion of surprise audits required under section 3.4 of the UTZ certification protocol or by the section 4.3.d of the Rules for Planning and Conducting Audits of the Rainforest Alliance during the validity of this policy. If you have any doubts about not being able to conduct surprise audits still this year, please inform us on cbmanagement@ra.org.

p) Certificate Holders who wish to include an additional crop in scope during a fully or partially remote audit, can only do so if the crop is farmed using the same cultivation practices as the existing crop e.g. if a producer wants to add another herb to an existing one like chamomile on top of peppermint. To request a completely new crop in scope e.g. tea in current coffee scope, can only be done through an on-site audit.

3 REPORTING RESULTS OF PARTIAL REMOTE AUDITS IN THE CERTIFICATION PLATFORMS

For Full Remote Audits, the normal procedure in the certification platforms shall be followed. For Partial Remote Audits, below guidelines shall be followed:

3.1 SALESFORCE

Both the results of the remote part and the on-site part of the audit must be uploaded in the same Engagement:

a) Following the certification decision based on the remote part of the audit, CBs shall upload the information from the remote part in the engagement, indicate the not evaluated criteria as NA (not applicable) and close the engagement;

b) After the second part of the audit (on site part of the audit) the engagement must be updated. To do so, CBs must open the engagement again via the section "Job Completed" and upload the new Checklist and Audit Plan.

3.2 GIP

a) Following the certification decision based on the remote part of the audit, CBs shall submit a license request in GIP, according to the regular procedure.

b) If the member received a Force Majeure Volume extension before, the Certification Body must subtract this volume from the requested certified volume in the license request.

c) Once the onsite part of the audit and the corresponding certification process is finalized, the Certification Body needs to send the results of the on-site audit to Rainforest Alliance, this includes the updated checklist and the audit plan. This documentation must be sent to cbcert@ra.org with the following information in the title of the e-mail: COUNTRY – Member ID – Onsite Audit Documentation. The timelines as stated in the Protocol are applicable.

d) If the Certification Body finds a severe Non-Conformity (refer to UTZ Certification Protocol 2.3.2 General Conditions point d. Non-conformities) during the on-site part of the Audit, the license must be suspended, as stated in the Guidelines to Conduct Remote Audits.

3.3 MULTITRACE

a) For Partial Remote Audits, the remote part of the audit will be presented in MultiTrace as normal, with 100% of the volume declared (including volumes on GMR). The system will automatically subtract the Force Majeure Volume already extended.

b) Once the onsite part of the audit is conducted, Certification Body needs to send the respective information to Rainforest Alliance, this includes the updated checklist and the audit plan of this audit. This documentation must be sent to cbcert@ra.org including the following information in the title of the e-mail: COUNTRY – Member ID – Onsite Audit Documentation. Same timelines stated in the Protocol apply;

c) If the Certification Body finds a severe Non-Conformity (refer to UTZ Certification Protocol 2.3.2 General Conditions point d. Non-conformities) in the on-site part of the Audit, the license must be suspended, as stated in the Guidelines to Conduct Remote Audits.

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