

RAINFOREST ALLIANCE POLICY

REMOTE CLOSURE OF NON- CONFORMITIES

Version 1



**RAINFOREST
ALLIANCE**



The Rainforest Alliance is creating a more sustainable world by using social and market forces to protect nature and improve the lives of farmers and forest communities.

Translation Disclaimer

For any question related to the precise meaning of the information contained in the translation, please refer to the official English version for clarification. Any discrepancies or differences in meaning due to translation are not binding and have no effect for auditing or certification purposes.

More information?

For more information about the Rainforest Alliance, visit www.rainforest-alliance.org or contact info@ra.org

Document Name:		Document Code:	Version:
Policy on Closure of Non-conformities		SA-P-GA-11-V1	1.0
Date of first publication:	Date of revision:	Valid From:	Expires by:
May 2021	N/A	July 1, 2021	December 31 2022
Developed by:		Approved by:	
Global Assurance		Director of Standard and Assurance	
Linked to:			
SA-R-GA-1-V1.1. 2020 Certification and Auditing Rules (Version 1.1). SA-R-GA-2-V1.1. Rainforest Alliance Transition Rules for current UTZ and Rainforest Alliance Certificate Holders wishing to be certified under the 2020 Rainforest Alliance Certification Program (Version 1.1). SA-S-SD-1-V1.1. Rainforest Alliance Sustainable Agriculture Standard. Farm Requirements. (Version 1.1).			
Replaces:			
N/A			
Applicable to:			
UTZ and 2017 Rainforest Alliance farm Certificate Holders transitioning to the 2020 Rainforest Alliance Certification Program			
Country/Region:			
All			
Crop:		Type of Certification:	
All crops		Farm certificate holders	

This policy document is binding. This means that it must be adhered to; therefore, this policy supersedes any related rules or requirements contained in the documents listed in the section "linked to" and/or "replaces" for those party or parties as indicated in the "applicable to" section.

Any use of this content including reproduction, modification, distribution or republication, without the prior written consent of Rainforest Alliance is strictly prohibited.



1. INTRODUCTION

Rainforest Alliance understands that the 2020 Rainforest Alliance Certification Program introduces a number of important innovations that Certificate Holders may need time to implement fully. We are also aware that this may lead to the need for more follow-up audits to check the closure of non-conformities. Therefore, for the sake of efficiency, Rainforest Alliance Certification will allow CBs to perform remote follow-up audits to verify closure of non-conformities (NCs) identified on farms. This policy describes the conditions in which on-site follow-up audits must be performed and when remote follow-up audits are possible.

2. GLOSSARY

Remote follow-up audit: Audit performed remotely by a CB with the objective of verifying closure of NCs detected on a (re)certification, surveillance or transition period audit.

On-site follow-up audit: Audit performed in person at the premises of the Certificate Holder (CH) or potential CH by a CB with the objective of verifying closure of non-conformities (NCs) detected on a (re)certification, surveillance or transition period audit.

3. OBJECTIVES

- 3.1 Provide CBs with criteria to decide when a remote follow-up audit is possible and when the follow-up audit must be done on site.
- 3.2 Allow farm Certificate Holders a smooth and efficient transition to the Rainforest Alliance 2020 Certification Program by ensuring on-site follow-up audits are only conducted when strictly necessary.

4. POLICY

General rules on closure of NCs

- 4.1 The CH shall close all NCs in a period of maximum 10 weeks after the last day of the audit (CAR, section 1.4.41) by implementing the appropriate correction and corrective action plan to prevent recurrence of the NCs (CAR, section 1.7.9).
- 4.2 For NCs related to labor conditions for which remediation will take longer than the period allowed for closure of NCs (e.g., grievance mechanism and gender equality promotion), the NC may be closed with a corrective action plan (CAR, section 1.7.10.d).

Remote follow-up audits

- 4.3 For Transition Period audits, closure of nonconformities (NCs) that can be assessed remotely, through document review, virtual observation and/or interviews with management, may be done through a remote follow-up audit as follows:
- 4.4 To close an NC related to documentation only (e.g., plans or records), the CH shall send evidence to the CB for review.
- 4.5 To close NCs where observation is required to evaluate improvement of conditions, the CH shall submit to the CB recorded videos with a date stamp or live videos as evidence.
- 4.6 To close NCs related to training of workers the CB shall consider detailed training records and/or videos with a date stamp of training sessions as evidence of closure. Remote closure of NCs related to training should also include some verification of the knowledge of workers to demonstrate the training was effective. Please see Table 1 below for examples.



Table 1: Example of core requirements that require verification of workers' knowledge.

Requirement number	Topic	Aspects that could require on-site check
5.6.1.	Occupational health and safety risks analysis	Knowledge of workers on Health and safety procedures
5.6.5	Access to safe drinking water in small farms (training program).	Knowledge of group members on potable water treatments and prevention of water contamination.
5.6.10	All tools used by the workers are in good working condition.	Workers using such machines have appropriate knowledge to operate machines safely
5.6.13	Workshops, storage areas, and processing facilities are safe, clean, with sufficient light and ventilation.	Workers are trained on how to use firefighting equipment and spillage of materials.
5.6.15	Workers receive basic training on occupational health, safety, and hygiene and related instructions are visibly displayed at central locations.	Workers Understanding of these topics. Visible evidence that instructions are displayed at central locations
5.6.16	Workers who regularly handle hazardous agrochemicals receive a medical examination at least once a year.	Workers' testimony that they have received a medical examination and have access to the results of their medical examination.

- 4.7 When a remote follow-up audit is used, the CH shall send the CB all the evidence of correction necessary for closing the NCs, within the allowed timeframes (maximum 10 weeks), as described in the 2020 Certification and Auditing Rules (CAR).
- 4.8 Regardless of the provisions in this policy, Rainforest Alliance reserves the right to request that a specific follow-up audit takes place on-site.

On-site follow-up audits

- 4.9 On-site follow-up audits shall be performed for verification of corrective actions of NCs where the information provided by workers, through confidential interviews, is crucial to verify compliance. Information provided by workers normally confirms or refutes information provided by CHs' management.
- 4.10 Requirements related to working conditions, such as discrimination, overtime, wages, freedom of association and harassment, among others, will usually require an on-site follow-up audit. Table 2 shows a list of requirements that typically require a site visit.
- 4.11 When there is an unresolved complaint, the follow-up audit must take place on-site, at least to verify compliance with the issues related to that complaint.
- 4.12 An on-site follow-up audit is mandatory if any single NC requires verification of compliance through on-site verification. See the list of requirements which could require on-site verification in Table 2 below:



Table 2. List of requirements and NCs that could require an on-site follow-up audit to conduct confidential interviews or verify physical improvements.

Requirement number	Topic	On-site follow-up audit required	Remote follow-up audit allowed
4.6.3 and 4.6.4	Pesticide handlers are trained, wear PPE, and bathe, change and wash clothes after application.	When interviews confirmed pesticide handlers do not bathe or change clothes after application.	To check training records and other relevant documentation.
5.1.1	Management commits to assess-and-address child labor, forced labor, discrimination, and workplace violence and harassment. The worker representative(s) is/are selected by workers.	When the NC is related to selection of representatives by workers.	To check documentation of management commitment to Assess and address
5.1.4.	Confirmed cases are remediated and documented following the Rainforest Alliance Remediation Protocol. Safety and confidentiality of the victims are protected throughout the process.	When the safety of the victim is at risk.	
5.2.1	Workers have the right to form and join a union or workers' organization	Usually	If the NC is only related to the written policy.
5.2.2	Workers are not subject to discrimination or retaliation for reasons of past or present workers' organization or union membership or activities	Usually	If the NC is related only to record keeping of terminations.
5.2.3	Management provides workers' representatives reasonable paid time off from work to carry out their representation functions and attend meetings, access to a notice board and establishes a genuine dialogue.	Usually	If the NC relates only to the absence of records of meeting minutes.
5.3.1	Permanent and temporary workers have contracts (written or verbal depending on conditions). Written ones signed by both parties and workers receive a copy.	Usually	When the NC relates only to absence of evidence of verbal contracts.
5.3.2	Management does not engage in arrangements or practices designed to eliminate or reduce <u>workers'</u> pay and/or benefits.	Always	
5.3.3 - 5.3.4	<u>Workers</u> receive at least the applicable minimum wage, or the wage negotiated in a Collective Bargaining Agreement (CBA), whichever is higher. Adjusted yearly for inflation. Conditions for piece work.	Usually	When the NC relates only to absence of record keeping in relation to payment of wages
5.3.5	Deduction from wages permitted if provided by	Usually	When the NC relates only to absence of



Requirement number	Topic	On-site follow-up audit required	Remote follow-up audit allowed
	applicable law or CBA and by worker if voluntary. Not allowed deductions listed. Regulations for In Kind benefits.		record keeping in relation to deductions and in kind benefits
5.3.6 and 5.3.7	Workers are paid regularly at scheduled intervals. Maintenance of records per worker. In kind benefits.	Usually	When the NC involves only record keeping.
5.3.8	Work of equal value is remunerated with equal pay.	Usually	When the NC involves only record keeping.
5.5.1	Regular working hours per day and week, breaks and days of rest. Regular working hours of guards.	Usually	When the NC involves only record keeping.
5.5.2.	Overtime work is voluntary and permitted under a list of conditions.	Usually	When the NC involves only record keeping.
5.6.4	Access to sufficient and safe drinking water.	Usually	When the NC relates to evidence of testing of the water quality parameters
5.6.6	Workers in small farms have access to sufficient and safe drinking water	Usually	When the NC relates to evidence of testing of the water quality parameters
5.6.7	Sufficient and clean and functioning toilets and handwashing stations.	When the NC is related to workers being able and allowed to access and use these facilities	
5.6.9	Persons that work in hazardous situations (e.g., under challenging terrains, with machines or with hazardous materials) use appropriate Personal Protective Equipment (PPE). These persons are trained in the use of the PPE and have access to the PPE free of charge.	When the NC is related with charges to workers for required PPE.	
5.6.11	Working conditions of pregnant, nursing or recently given birth females.	When the NC relates to farms carrying out pregnancy tests as part of the hiring process.	
5.7.1	Conditions of lodging for workers and their families.	When the NC relates to children being separated from their parents.	