RAINFOREST ALLIANCE
POLICY
Certification timelines and procedures for Cocoa groups in Côte d’Ivoire
Version 1
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.

More information?
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INTRODUCTION

This policy sets out the certification timelines for cocoa groups in Côte d’Ivoire for the Rainforest Alliance 2020 Certification Program. From May 1st, 2022 onwards all groups must comply with the audit procedures and timelines as described in this policy.

Groups will be assigned one of two audit cycles based on their risk level. Rainforest Alliance will calculate the risk level for each group prior to allocation for the coming certification year. The group must hold their audit during the audit window they are assigned and follow the required procedures. All RA 2020 certificates issued after the first transition year will be valid from 1 October to 1 October of the next year, regardless of which audit cycle was applied.

High and very high risk groups must go through the certification process during the October harvest window between May and November. They must have a two phase audit. Very low, low and medium risk groups must go through the certification process during the April harvest window (between January and June). They must have a single on-site audit.

This document consists of two sections. The first section explains the process used to determine the risk level of groups. The second section contains a detailed overview of the certification procedures for each risk category.
RISK LEVEL

1.1 GENERAL

The process to determine the risk level of groups will consist of two steps:

1) calculation of risk level by Rainforest Alliance prior to allocation, and
2) verification of risk level in the field by the CB during the audit.

Rainforest Alliance will determine the risk level for all registered groups every year prior to allocation. The RA risk level will determine whether the group must have their audit during the October or the April harvest cycle and which audit procedure they must follow (single audit or two phase audit).

During the audit, the CB will verify the risk level assigned to the group by RA. If the CB observes that the assigned risk level is too high or too low they must inform Rainforest Alliance of the need to change the risk level. If a CH’s risk level changes they may also need to change their audit cycle and procedure for the following year.

1.2 RISK LEVEL DETERMINED BY RAINFOREST ALLIANCE

Rainforest Alliance will determine the risk level for existing and new Certificate Holders in Côte d’Ivoire based on available data prior to allocation. Risk level is classified on a scale from 1 (very low risk) to 5 (very high risk). The risk level determined by Rainforest Alliance will define the audit period and procedure the group must follow (see table below). CHs will be notified of their audit period and procedure prior to allocation. Rainforest Alliance will also notify the allocated CB once the group has been allocated (after uploading the GMR).

<table>
<thead>
<tr>
<th>Risk level</th>
<th>Interpretation</th>
<th>Audit procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Very low risk</td>
<td>Single on-site audit: January – July</td>
</tr>
<tr>
<td>2</td>
<td>Low risk</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Medium risk</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>High risk</td>
<td>Phase 1 audit: May – August</td>
</tr>
<tr>
<td>5</td>
<td>Very high risk</td>
<td>Phase 2 audit: September - November</td>
</tr>
</tbody>
</table>

All groups that are new to the Rainforest Alliance 2020 program will automatically be assigned very high risk. This also applies to groups who come back to the program after a non-certification decision. Risk level may be increased or decreased the following year based on the assessment of RA and the CB.

Factors used to determine the group risk level

Rainforest Alliance uses a range of factors to calculate the risk level of a certificate holder. These include (but are not limited to):

- Non-conformities raised on key credibility topics during the last two audits (see full list of requirements under section 1.3.2).
- Previous non-certification decision in the last two years
- New groups (new groups will automatically be considered as high risk groups)
- Size and average yield of group
- Results of deforestation risk maps
- Other relevant factors based on data or observations
1.3 RISK LEVEL OBSERVED DURING AUDIT

1.3.1 CB assessment of risk level

CBs will need to assess the actual risk level of the Certificate Holder in the field during the audit. This includes reporting on the number of Non-conformities in key credibility risk areas resulting from the audit (see list under 1.3.2). If the CB has reason to believe that the risk level assigned by Rainforest Alliance is too low – based on Non-conformities on key credibility topics, or any other justifiable findings - the CB must inform Rainforest Alliance of the need to raise the risk level when submitting the license request. In the same way, if the CB finds during the field assessment that the risk level assigned by Rainforest Alliance is too high, the CB must inform Rainforest Alliance of the need to lower the risk level. Demonstrable justification and evidence must always be provided. The feedback from the CB will then be taken into account during the risk assessment for the following year.

Changes in the risk level are always subject to approval from Rainforest Alliance. Rainforest Alliance reserves the right to change or maintain the risk level depending on evidence provided by the CB and other information collected by Rainforest Alliance. Rainforest Alliance can also change the risk level at any point if information about the CH warrants it (ex: observation in surprise audit, whistleblower report, etc.).

Potential consequences of change of risk level

If a CH’s risk level changes they may also need to change their audit cycle and procedure for the following year.

Example 1: a medium (3) risk group conducts their audit in March 2023. The CB observes a higher real risk and requests an increase to high risk (4) which is accepted by Rainforest Alliance. The following year, the group must have a two phase audit between May and November 2024.

Example 2: a high (4) risk group finishes their two phase audit in November 2022. The CB observes a lower real risk and requests a decrease to medium (3) risk. The following year, the group must have a one – phase audit between January and June 2023.
1.3.2 Risk indicators assessed during audit

**Non-Conformities in Key Credibility Areas**

Hereunder is a list of the 2020 Standard requirements that indicate a risk for key credibility topics. The CB must consider Non-conformities against these requirements when assessing the risk level of the CH during the on-site audit. Non-conformities on these requirements should be shown as evidence of the need to increase the risk level of the CH. Similarly, the complete absence of Non-conformities on those requirements may be given as evidence of the need to decrease the risk level of the CH. Please note that factors for changes of risk level are not limited to this list.

Chapter 1: Management
- 1.5.1 Grievance Mechanism

Chapter 2: Traceability
- 2.1.5 Products sold can be matched to certified farms where they were produced
- 2.1.6 Total sales do not exceed production
- 2.1.7 Double-selling of volumes
- 2.1.8 Group members keep sales receipts

Chapter 3: Income and Shared Responsibility
- 3.2.1 Payment of SD

Chapter 4: Farming
- 4.6.1 Use of Prohibited Pesticides
- 4.6.2 Pesticide Risk Mitigation
- 4.6.3 PPE for handling of pesticides
- 4.6.6 Protection of natural ecosystems from pesticides

Chapter 5: Social Topics
- 5.1.3 Monitoring system for child labor, forced labor, discrimination, and workplace violence and harassment.
- 5.1.4 Remediation plan for child labor, forced labor, discrimination, workplace violence and harassment.
- 5.2.1 Freedom of Association
- 5.2.2 Right to Collective bargaining
- 5.3.3 & 5.3.4 Minimum wage
- 5.3.8 Equal pay
- 5.3.9 & 5.3.10 Third-party labor providers
- 5.5.4 Children of workers
- 5.6.9 Personal Protective Equipment (PPE)
- 5.6.11 Pregnant workers
- 5.6.12 Dangerous situations
- 5.8.2 FPIC for Indigenous groups

Chapter 6: Environment
- 6.1.1 No conversion of natural ecosystems
- 6.1.2 Protected Areas
- 6.3.1 Protection of drinking water
- 6.4.1 Protection of threatened animals
- 6.4.2 Invasive species
- 6.6.3 & 6.7.1 Disposal of wastewater & waste

**Additional requirements to be verified by the CB**
- Group members show commitment to the cooperative by paying their membership fee (part sociale)
2. AUDIT PROCESS

2.1 AUDIT PROCEDURE FOR VERY LOW, LOW AND MEDIUM RISK GROUPS IN COTE D’IVOIRE

Groups that are assigned very low, low or medium risk level by Rainforest Alliance must carry out their audit during the April harvest cycle, between 1 January and 30 June.

All audits carried out during this cycle must follow the steps of a normal full on-site audit as described in the Certification & Auditing Rules. Once the group closes their Non-conformities in the 10-week timeframe, they will receive a 1 year certificate with a start date of 1 October 2023. Please note that these groups will therefore be audited several months ahead of the start of their new certificate.

Potential outcomes of the certification process

- **Certification**: the group receives a 1 year certificate with validity from 1 October of the same year to 1 October of the next year, as well as a license with 100% of their annual volume.
- **Non-certification**: the group does not receive a certificate and will not be able to certify its harvest of October of that year and April of the following year. Upon reapplying to the program, the group will be considered very high risk (5) and will need to go through a two phase audit during the October cycle.

Potential consequences of change in risk level

- If the CH is confirmed to be in the very low, low or medium risk category as determined by Rainforest Alliance, they will remain in the same (April) cycle for the next year with the same audit procedure (one on-site audit).
- If the CH is considered to be higher risk by the CB, the CB must inform Rainforest Alliance of the need to adjust the risk level.
  - If after the adjustment in risk level, the CH remains in the low – medium risk category (for example from very low risk (1) to low risk (2)), they will remain in the same (April) cycle for the next year with the same audit procedure (one on-site audit).
  - If after after the adjustment in risk level, the CH passes to the high and very high risk category, they must change their audit cycle in the following year and conduct a two-phase audit during the October season of the following year.

Steps of the certification process:

1. By 30 April, Rainforest Alliance determines the risk factor of the CH and notifies the CH of their audit cycle. Groups that register in the RACP after this date will be notified on a rolling basis.
2. When the group receives notification of their audit cycle the CH uploads its GMR to the RACP.
3. Once the GMR is uploaded, the CH is allocated to a CB. Rainforest Alliance notifies the CH and the CB of the allocation.
4. The CH shares the Certification Application Form (CAF) with the CB.
5. The CH and the CB sign an agreement for an audit (virtual handshake on the RACP)
6. The CH and the CB agree on an audit date between 1 January and 30 June. This date is indicated by the CB in the audit planning file on SharePoint.
7. The CH shares all the mandatory audit preparation documents with the CB at least 4 weeks before the first audit day.
8. The CB conducts the on-site audit and assesses the risk level in the field
9. If any non-conformities were identified during the audit, the CH has 10 weeks to close them (as per Certification & Auditing Rules). The CB determines if the Non-conformities may be closed remotely or if a follow-up audit is needed.
10. Certification decision:
   - If the certification decision is positive, the group is granted:
     i. A certificate starting 1 October of the same year, which is valid for 1 year
     ii. A license with 100% of the annual volume.
   - If the certification decision is negative, the group is not granted a certificate. They automatically become very high risk and can only re-apply for an audit in during the October cycle of the following year (during the audit cycle for high and very high risk groups)
2.2 AUDIT PROCEDURE FOR HIGH AND VERY HIGH RISK GROUPS

Groups that are assigned a high or very high risk level by Rainforest Alliance must carry out a two-phase audit during the October harvest cycle. The audit must take place between May and November.

**Phase 1 May – August**

The first phase of the procedure for high and very high risk groups consists of a full on-site audit which takes place between May and August. The first phase includes verification of the IMS and visits to sampled producers. The CB must take the certification decision immediately after the audit based on whether or not Non-conformities are present on the requirements listed in section 1.3.2.

**Phase 2 September – November**

The second phase is an additional check which allows for CBs to verify any requirements which can only be audited during the harvest. The second phase must therefore take place between September and November. It is based on a checklist of the requirements that are essential to be checked during the harvest. Rainforest Alliance will publish this list separately. Any non-conformities identified in Phase 1 must be closed before the phase 2 audit and closure will be verified during the Phase 2 audit. Phase 2 should be considered as an extended on-site follow-up audit. After that, the group has an additional 4 weeks to close any Non-conformities that were identified by the CB in phase 2.

**Potential outcomes of the certification process**

- **Phase 1**
  - All groups that have concluded phase 1 will receive a certificate starting 1 October
    - If no non-conformities on key credibility risk areas were identified, the group will receive a license with 20% of their annual volume
    - If non-conformities on any key credibility risk areas were identified, the group will not receive any volumes at this stage
  - Groups are required to close their non-conformities (both on key risk and non-key risk areas) before the phase 2 audit and to provide evidence of closure to the CB at the latest two weeks before their phase 2 audit begins.

- **Phase 2**
  - Groups that have closed their non-conformities from phase 1 and the closure has been verified during the Phase 2 audit can be certified once they have closed any non-conformities found during the phase 2 within four weeks:
    - For groups who already have an active license with 20% of their annual volume after phase 1, the remaining 80% will be added
    - For groups who received a certificate with no volume in phase 1, the license will be activated with 100% of their annual volume
  - If the group has not closed its non-conformities from phase 1 by the second phase, or was not able to close their non-conformities from phase 2 within the four weeks allowed for closure of non-conformities, the group will not be certified. Rainforest Alliance will cancel the certificate and any remaining volumes on the license of the group.
Steps of the certification process

Audit application

1. Ahead of the certification year, Rainforest Alliance determines the risk factor of the CH and notifies the CH of the corresponding audit cycle.
2. The CH receives a notification from Rainforest Alliance when its applicable audit cycle is approaching. The CH must then upload its GMR to the RACP. Once the GMR is uploaded, the CH is allocated to a CB.
3. The CH shares the CAF with the CB. Once the quotation process is concluded, CH and CB sign an agreement (virtual handshake on the RACP). The quotation must include the price for both phases of the audit.
4. CH and CB agree on audit dates for both phases of the audit. Both dates are indicated by the CB in the audit planning file on SharePoint.

Phase 1

5. The CH shares all the mandatory audit preparation documents with the CB at least 4 weeks before the first audit day of the first phase audit.
6. The CB conducts the first phase on-site audit between May and August using the Phase 1 audit checklist.
7. Immediately after concluding the audit, the CB makes the certification decision:
   - If the audit team has identified any non-conformities on key credibility topics, the group will be certified but will not be granted any volumes.
   - If the audit has not identified any non-conformities on key credibility topics, the group will be certified and will receive a license with 20% of their annual volume.
8. The CB submits the certificate request within two weeks after the last day of the phase 1 audit.
9. Groups must close the non-conformities from phase 1 before conducting their phase 2 audit.

Phase 2

10. The group must submit evidence for closure of their non-conformities from phase 1 at the latest 2 weeks before the start of the phase 2 audit.
11. If any of the information in the audit preparation documents has changed (e.g. GMR), the group must share the updated documents with the CB 2 weeks prior to the audit.
   - In the event that there has been an increase of more than 10% in group members, the CH must undergo a complete certification audit.
12. The CB conducts the second phase (extended on-site follow up audit), which must focus on:
   - The requirements related to harvest activities based on the reduced checklist for phase 2
   - Verification of closure of the non-conformities from phase 1
13. In case any additional non-conformities were identified during the audit, the CH has 4 weeks to close them.
14. The CB takes the final certification decision 5 weeks after the last day of the second phase audit and submits the final certification decision within one week to the Rainforest Alliance.
   a. If a positive certification decision is taken:
      i. For groups that received a certificate with 20% volume in Phase 1 the remaining 80% of annual volume is added to the license and the audit process is closed
      ii. For groups that received a certificate with no volume in phase 1 a licence with 100% annual volume is granted and the audit process is closed
iii. In case the on-site risk assessment shows very low risk (0 Non-conformities on key areas): the group may be eligible to change risk level to a lower risk and change cycle (final decision remains responsibility of RA). If any Non-conformities on key areas, the group remains in its high or very high risk level.

b. If a negative certification decision is taken: the certificate and license are cancelled and the group can re-apply for certification in the next October harvest.

Focus requirements per phase

Both phase 1 and phase 2 are on-site audits. However, due to the harvest cycle, some requirements may be difficult or impossible to reliably assess in phase 1 (outside the main harvest season). Rainforest Alliance will provide checklists adapted to the specific context of each phase. These will be published separately.

2.3 PLANNING AUDIT DATE

After the end of the first transition year, audit allocation will be done on a rolling basis, provided the audit takes place in the required time frame. Allocation is based on CB capacity to audit in each month. (This is not applicable to low and medium risk groups who already have an allocated CB for their transition audit due to take place between January and June 2022).

The CH must agree with their CB on the specific dates for all audit phases in their initial contract. CHs can reschedule their audit only one time (as per requirement 3.2.g. of the 2.2 Cocoa Policy), subject to the capacity of their allocated CB to audit at a later date. The new audit date proposed should not exceed the audit period allocated by RA based on the CH’s risk level.

If the CH is not ready for the new audit date, the CH will not being able to undergo an audit in this year and will only be able to re-apply for certification the following year in the audit period defined for their risk level. If the CH has already undergone a Phase 1 audit and received 20% of their annual volume on their license, any volume previously granted will be suspended.
ANNEX 1: VISUAL OF AUDITING TIMELINES

[Diagram showing timelines and phases with months and percentages]
ANNEX 2: VISUAL OF CERTIFICATION PROCEDURE FOR VERY LOW, LOW AND MEDIUM RISK GROUPS

RA informs CH on risk level and certification cycle (April 2022) → CH uploads GMR in the RACP (audit application) → RA allocates a CB to the CH → CH shares CAF with CB

CH and CB sign agreement and determine audit date between 1 January and 30 June → CH shares all audit documents with CB prior to phase 1 → CB conducts audit between 1 January and 30 June

max. 10 weeks

CH closes non-conformities → CB takes certification decision

max. 1 week max. 1 week

Certification → RA grants certificate (validity 1 October to 1 October) and license with 100% annual volume

Non-certification → Certificate not granted + CH must do next audit during October cycle of the following year

CB submits license request to RA
ANNEX 3: VISUAL OF CERTIFICATION PROCEDURE FOR HIGH AND VERY HIGH RISK GROUPS

RA informs CH on risk level and certification cycle (April 2022) → CH uploads GMR in the RACP (audit application) → RA allocates a CB to the CH → CH shares CAF with CB

CH and CB sign agreement and determine audit dates (phase 1 and phase 2) → CH shares all audit documents with CB prior to phase 1 → CB conducts phase 1 audit between May and August

min. 4 weeks → max. 2 weeks

CB submits certificate request to RA → NC on key risk topics?

NC on key risk topics?

No → RA grants certificate and license with 20% annual volume → CH closes NC and submits evidence max. 2 weeks before phase 2

Yes → RA grants certificate without license → CB conducts phase 2 audit between September and December

max. 4 weeks → max. 1 week

CB takes final certification decision

certification → RA adds remaining volume to license

non-certification → RA cancels certificate and volumes on license (if any) → CH submits to CB evidence for closure of phase 2 NC