

RAINFOREST ALLIANCE POLICY

CHANGES TO CERTIFICATION AND AUDITING RULES FOR AUDITS IN THE TRANSITION PERIOD

Version 1.3



**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, or contact the Rainforest Alliance Amsterdam Office, De Ruijterkade 6, 1013AA Amsterdam, The Netherlands.

Document Name:		Document Code:	Version:	Language:
Policy on changes to certification and auditing rules for audits in the transition year		SA-P-GA-8	V1.3	EN
Date of first publication:	Date of revision:	Valid From:	Expires by:	
July 13 th , 2021	May 5 th , 2023	May 1 st , 2023	December 31 st , 2023	
Developed by:		Approved by:		
Global Assurance		Director of Standards and Assurance		
Linked to:				
<ul style="list-style-type: none">• SA-R-GA-1 2020 Certification and Auditing Rules• SA-S-SD-1 Rainforest Alliance Sustainable Agriculture Standard. Farm Requirements.• SA-S-SD-2 Rainforest Alliance Sustainable Agriculture Standard. Supply Chain Requirements.• SA-R-GA-2 Rainforest Alliance 2020 Transition Rules.				
Replaces:				
SA-P-GA-8-V1.1 Policy on changes to certification and auditing rules for audits in the transition year				
Applicable to:				
CBs, certificate holders and prospect certificate holders				
Country/Region:				
All				
Crop:		Type of Certification:		
All crops		Farm certificate holders Supply Chain certificate holders		



MAIN CHANGES FROM VERSION OF 13 JULY 2021

The table below summarizes the main changes in this version of the policy from the previous version published on 13 July 2021

Section	Change
CAR ¹ 1.4.20 (pr. ² 1.4.24)	DELETED: Audit planning sent exclusively through the CB management email. NEW: Rainforest Alliance may request an overview of signed contracts.
CAR 1.4.22 (pr. 1.4.26)	NEW: Rainforest Alliance may request additional information for the license review process, based on a list of main risks per country that will be provided.
CAR 1.4.46	DELETED: Until further notice, the license request process will not be done in the RACP. This is now covered in the Certification Rules, v. 1.2.
CAR 1.5.4 (pr. 1.5.5)	DELETED: Reference to the Transition Rules, as this document will not be binding anymore.
CAR 1.5.44	NEW: Follow-up audits to be carried out remotely, with few exceptions. On-site follow-up audits must be included in the CB audit plan.
CAR 1.5.45	NEW: Rainforest Alliance may request the CB to carry out a follow-up audit remotely.
CAR 1.7.10 (d)	NEW: Clarification for those CHs who hold their first transition audit between 1 July 2021 and 30 September 2022. MODIFIED: Two transition years, instead of one.
CAR 1.8.1	NEW: CBs to facilitate the transfer process.
CAR 2.4.10	NEW: Witness audits of internal inspectors are not mandatory during the transition period.
CAR 2.5.7	NEW: During the transition period, this section is replaced by the use of the CAF.
CAR 2.13.4	NEW: In some cases, Rainforest Alliance may require the CBs to describe the evidence of conformity as well.
	NEW: Geolocation data of farm units with non-certified crops is not required during the transition period.
TR ³ F4	NEW: Binding date for smart meter requirements.
TR F49	NEW: Binding date for the Salary Matrix requirement.
TR F56	NEW: Validity of the second transition audit certificate.
TR F74	NEW: Transition rule that remains applicable.
TR SC111	NEW: Transition rule that remains applicable.
TR SC112	NEW: Transition rule that remains applicable.

1. INTRODUCTION

The 2020 Rainforest Alliance Certification Program introduces several important innovations that will strengthen our assurance system. We recognise that these will need additional time to be fully implemented. Rainforest Alliance therefore authorizes the changes summarized in

¹ **CAR** – Certification and Auditing Rules.

² **Pr.** – Numbering of this clause in the previous version of the Certification and Auditing Rules.

³ **TR** – Transition Rules



this policy, during the two transition years. This policy describes the changes to ensure consistent implementation of the Certification and Auditing Rules across the program.

2. GLOSSARY AND ABBREVIATIONS

CAF	Certification Application Form
CAR	2020 Rainforest Alliance Certification and Auditing Rules
CB	Certification Body
CH	Certificate Holder
RACP	Rainforest Alliance Certification Platform

3. OBJECTIVES

Communicate the authorized changes to the published Certification and Auditing Rules, version 1.1 to enable smooth Transition Certification Audits.

4. POLICY

The changes described in the table below are only applicable to Transition Certification Audits.

Section in CAR	Current Rule	Authorized Modifications
1.4.20	The CB shall indicate the scheduled start date of the audit in the RACP 6 weeks before the first day of the audit (certification, re-certification, surveillance).	During the transition years, CBs are not required to set the first day of audit six weeks ahead. CBs may start the audit sooner , as long as the audit date is agreed upon with the client and enough preparation for the audit has been made. CBs are required to inform RA of their monthly audit planning biweekly, no later than the 14 th and the 28 th of each month, indicating tentative and confirmed dates. Rainforest Alliance reserves the right to request the CB for an overview of the signed contracts with CHs.
1.4.22	All CHs shall complete or revise their audit preparation or endorsement data and provide the applicable documents/data from the list below: [list of 12 documents]	For the transition audits the CHs only have to provide the following five documents to the CB before the audit: <ol style="list-style-type: none"> Certification scope information in the CAF, Self- Assessment, Group Member Registry, Checklist of applicable requirements, Latest audit report and transaction reports, if applicable. Supply chain CHs, must also provide the results of the Supply Chain Risk Assessment (SCRA) calculation of verification level. CBs are still required to verify the other documents listed in rule 1.4.22 during the audit. Rainforest Alliance reserves the right to request additional information from the CB



Section in CAR	Current Rule	Authorized Modifications
		as part of the license review process based on a list of main risks per country that will be provided.
1.5.44	The CB shall decide if it is necessary to perform the follow-up audit on-site or if a desk follow-up audit suffices. A desk follow-up audit may be limited to remote verification of evidence of closure, if the CB deems it sufficient.	<p>All follow-up audits must be carried out remotely and only be used to confirm closure of nonconformities that cannot be demonstrated with updated documentation or closed with an action plan, as per clause 1.7.10 (d).</p> <p>Nonconformities that cannot be closed with a plan are typically systemic, severe issues related to practices, not only missing documents.</p> <p>Follow-up audits may be carried out on site only when it is crucial to do in-person interviews with workers or check implementation of key measures in the field.</p> <p>CBs must inform RA in advance through the audit planning process if they intend to conduct a follow-up audit onsite and indicate the reason for this, OR If a follow-up audit is conducted onsite the CB must indicate the reason for the onsite check in the Final Audit Report.</p>
1.5.45	The Rainforest Alliance reserves the rights to require the CB to perform an on-site follow-up audit, regardless of the CB's decision, at any time during the certification cycle	The Rainforest Alliance may request the CB to perform a remote follow-up audit.
1.5.4	In addition to the certification and surveillance audits, the CB shall carry out surprise audits on at least 10% of the CHs in their portfolio or Rainforest Alliance CHs to verify continuity of conformity of the selected CBs.	Surprise audits are not mandatory during the transition years.
1.7.10	The CH shall submit a proposed corrective action plan to the CB that includes:	
(d)	In the event that the long-term solution to the root cause requires more than the maximum time frame allowed for closure of the NC, the NC may be closed with a corrective action plan, as long as the full implementation of the correction (of the short-term solution) has been completed within 10 weeks and the actions in the corrective action plan are concrete, time-bound, have started within the maximum allowed time frame, and will be finalized before the end of the certificate of the CH and no later than the below time frames:	<p>During the transition period audits, any NCs which require long-term solutions to address root causes may be closed by an action plan that goes beyond the 10-week period for NC closure, provided that the actions have been started during the 10-week correction period and will be completed by the certification audit of the first certification cycle⁴.</p> <p>For CHs who hold their first transition audit between 1 July 2021 and 30 September 2022, the action plan should indicate clearly those actions to be completed by the second transition audit and any additional actions to be completed by the</p>

⁴ Compliance of requirement 1.2.3, where suppliers and subcontractors need to be compliant and certified, will only be checked during the certification audit of the first certification cycle.



Section in CAR	Current Rule	Authorized Modifications
		certification audit of the first certification cycle.
		Additionally, groups with more than 500 smallholder members, who cannot feasibly close NCs related to requirement 1.2.12 (geolocation data) during the two-year transition period , shall send the CB a comprehensive justification of why correction will take longer. The group shall present a plan to achieve 100% implementation no later than the certification audit of the second certification cycle . This plan must have concrete targets for each year and progress against these targets must be documented. Failing to achieve any of these will result in a NC for the group.
1.8.1	Certificates may only be transferred from one CB to another for a new certification cycle (therefore they can only be transferred once every 3 years).	During the transition, period CHs may hire any CB authorized for the country and scope. CBs shall facilitate this process for CHs and not hinder it by any means.
1.8.4	Transfers or certification applications to new CBs shall not be accepted for CHs that: [list of five elements]	This rule does not apply during the transition period.
1.8.5	Certificate transfer requests shall be made in the RACP by the CH requesting a transfer.	This rule does not apply during the transition period.
1.8.7	The current CB shall acknowledge receipt of the transfer request sent by the organization and notify the new CB within 1 week of the request. The current CB shall indicate to the CH if there are any pending financial obligations that must be settled before the transfer can take place. If there are no pending financial obligations, then the new CB can accept the request and is free to contact the CH to begin the application and certification process.	A CB cannot sign an agreement with a CH if the CB that carried out the previous audit of the CH has informed the new CB there are pending payments . In this case the new CB must receive and keep evidence that pending financial obligations to the previous CB have been settled before accepting to audit the CH.
1.8.8	The new CB shall review the CH's profile in advance of the transfer and before accepting the transfer request. This review shall include: [list of six elements]	This rule does not apply during the transition period.
2.3.18	The CB shall upload the audit risk assessment to RACP for each audit at least 2 weeks prior to the first date of the audit, together with the detailed audit plan.	CBs are not required to upload the Audit Risk Assessment to the RACP two weeks before the audit, during the transition period. However, CBs must complete the CH risk assessment in the CAF and include it when submitting the audit report and provide it to RA before this submission on request.
2.3.19	The audit risk assessment performed by the CB for each audit shall consider at a minimum: [list of 21 elements]	The CB will only need to complete a calculation of the risk level of the CH in the CAF . The CB will use this assessment to identify particular areas of risk to verify during the audit, as per rule 2.3.20 and to calculate the minimum audit duration as per section 2.5
2.4.3.b	For all the sampling calculations: Unless otherwise specified in specific rules in this	When the calculated number is smaller than 5, the CB shall include at least 3



Section in CAR	Current Rule	Authorized Modifications
	document, when the calculated number is smaller than 5 , the CB shall include at least 5 or all such subjects (farms, persons/workers, documents, transactions, etc.) in the audit sample when the population size is smaller than 5.	elements , in the case of persons/workers, documents, transactions, etc. For the number of farm units, when the calculated number is smaller than 5, the CB shall include at least 2 farm units.
2.4.10	The CB audit team shall perform the witness audit of at least the square root of total number of internal inspectors or 8, whichever is smaller, to verify their competence and performance during a certification/ surveillance audit. [...]	This rule does not apply during the transition period.
2.5.4	Risk factor (RF)	The CB shall use the Risk Factor resulting from the Risk Assessment in the CAF to calculate the audit duration as per rule 2.5.4. The template for calculating minimum audit duration is also included in the CAF.
2.5.7	Estimation of minimum audit duration	During the transition period, this section does not apply. For estimating audit duration, CBs must use the CAF.
2.13.4	The checklist and audit report shall include the audit findings (conformity and nonconformity) with description of required objective evidence(s) obtained during the audit so that the reader understands the nature and magnitude/impact of the findings. [...]	Description of evidence of conformity is only required for issues flagged as high risk in the CH risk assessment in the CAF. Rainforest Alliance reserves the right to require the CBs to describe the evidence of conformity for particular requirements in a determined combination of sector and/or country. Evidence description is however still mandatory for all requirements with nonconformities.
Rule 2 Annex AR4.2	Prior to the onsite audit, the CB shall perform stakeholder consultation in Farm Standard audits that have high risk of child labor and/or forced labor based on the Rainforest Alliance child labor and forced labor sector risk maps and/or (very) high risk of nonconformity for freedom of association as identified by the CB (audit risk assessment during audit preparation) and/or the Rainforest Alliance.	Stakeholder consultation is only mandatory: 1. When there have been complaints related to child labor, forced labor or freedom of association in the last 12 months before the audit start day, or 2. If during the last audit of the CH, a nonconformity was raised on any requirements related to these issues. Rainforest Alliance reserves the right to require the CB to carry out a stakeholder consultation for a specific CH audit for cases related to other requirements, such as use of pesticides or aerial fumigation.
Rule 53 Annex AR4.10	The CB shall perform an off-site investigation following the requirements in this Annex when (very) high risks of nonconformity on social topics have been identified by the CB (audit risk assessment) and/or the Rainforest Alliance	An off-site investigation is only mandatory: 1. When there have been complaints related to social issues in the last 12 months before the audit start day, or 2. If during the last audit of the CH, one or more nonconformities were raised on any of the mandatory social requirements. Rainforest Alliance reserves the right to require the CB to carry out an off-site investigation for a specific CH audit for cases related to other requirements, such as use of pesticides or aerial fumigation.



Section in CAR	Current Rule	Authorized Modifications
	NEW	The requirement to provide geolocation data of farm units with non-certified crops is not mandatory for the transition audits.

Binding Transition Rules

The Transition Rules, version 1.1 document, becomes obsolete after the first transition audit has been successfully completed. However, the following rules still apply for farm (F) and supply chain (SC) certificate holders, with the modifications outlined in the table below.

Section	Current Rule	Modifications
F4	Other farming requirements of the Rainforest Alliance 2020 Standard enter into force as follows: Smart Meter requirements, whether mandatory or self-select, enter into force and shall only be audited as of July 1, 2022 [...]	Smart meter requirements only enter into force as of July 1, 2023 .
F49	In case of a non-conformity with requirement 5.4.1 on Living Wage, the timeframe for completing the entire Salary Matrix may be extended until the first full-scale audit.	Certificate holders must comply with the Salary Matrix requirement by the second transition audit .
F56	Transition Period Audits result, if successful, in a one-year Transition Certificate under the Rainforest Alliance 2020 Certification Program	A positive decision in the second transition audit will result in a one-year transition certificate .
F74	After January 1, 2023, only those CHs that have obtained a Transition Certificate and/or Rainforest Alliance 2020 Certificate may continue to perform activities and transactions with legacy volumes certified under the current UTZ or Rainforest Alliance certification programs.	Remains applicable.
SC111	Until December 31, 2022, CHs may perform activities and transactions with legacy volumes if they: - Possess a valid current UTZ certificate or license, or - Possess a valid current Rainforest Alliance certificate, license or endorsement, or - Possess a valid Rainforest Alliance 2020 Transition Certificate or endorsement.	Remains applicable.
SC 112	After January 1, 2023, CHs may continue to perform activities and transactions with legacy volumes certified under the current UTZ or Rainforest Alliance certification programs only if they: - have obtained a Transition Certificate and - have moved/merged the legacy volumes on their Rainforest Alliance 2020 account before the expiry of the validity of the Transition Certificate.	Remains applicable.