



PRO01 – General Requirements and Obligations for Qualified Verification/Certification Bodies

2016-09-01

Union for Ethical BioTrade

THE UNION FOR ETHICAL BIOTRADE

The Union for Ethical BioTrade (UEBT) is a member-based non-profit association that promotes the 'Sourcing with Respect' of ingredients that come from biodiversity. Members adopt sourcing practices that advance sustainable business growth, local development and biodiversity conservation.

PRO01 - General Requirements and obligations for Qualified Verification Bodies		
Replaces	PRO01 – Replace Verification by Verification/Certification to reflect that VBs also conduct certification services for UEBT Deleted 4.3.6	
Approval of the original document:	TD	2008-07-23
Approval of the previous version:	TD	2009-10-28
Last Update	Verification Unit	2014–11-15

THIS IS A WORKING DOCUMENT SUBJECT TO CHANGE.

CONTENT

The Union for Ethical BioTrade.....	1
This is a working document subject to change.	2
Content	2
1. Scope	3
2. Normative References	3
3. UEBT internal References.....	3
4. Terms and Definitions	3
4. Requirements for becoming Qualified Verification Bodies	4
4.1 General requirements	4
4.2 Structural Requirements	4
4.3 Human resource requirements	5
5. Obligations for qualified Verification Bodies	7
5.1 General obligations	7
5.2 Independent verification preparation obligations	8
5.3 Contract agreement requirements	10
5.4 Independent verification obligations	10
5.5 Reporting obligations	10
6. UEBT Oversight	11
7. Non-compliance	11
8. Confidentiality	11
9. Contact	11

1. SCOPE

UEBT works with Verification Bodies that are accredited under ISO 17065 and/or ISO 17021 and that are therefore deemed to correctly apply these international standards to their operations.

This procedure details the requirements for qualification under the UEBT verification system and the way Verification Body must work in the context of the UEBT system, including the audit protocol. It also details the obligations qualified Verification Body shall follow and comply with.

2. NORMATIVE REFERENCES

ISO/IEC 17000:2004, Conformity assessment — Vocabulary and general principles

ISO/IEC 17065:2012 - Conformity assessment — Requirements for certification bodies certifying products, processes and services. (Includes main requirements from ISO/IEC 19011:2011 – Guidelines for quality and/or environmental management systems auditing).

ISO/IEC 17021:2011 – Conformity assessment — Requirements for bodies providing audit and certification of management systems

3. UEBT INTERNAL REFERENCES

The following referenced documents are essential for the application of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

UEBT STD01 – Ethical BioTrade Standard

UEBT GOV25 – Membership Conditions and Obligations for Trading Members

UEBT PRO10 – Membership Application Process for Trading Members

UEBT PRO24 – Independent Verification of Trading Members

UEBT PRO25 – Ethical BioTrade Work-Plans

UEBT ADM02 – Attestation of Conformity with Minimum Indicators

UEBT ADM03 – Audit Report Template

UEBT ADM06 – Application Form for Trading Members

UEBT ADM16 – Indicative List of Documents for Audit

UEBT ADM17 – Ingredient Portfolio Assessment

UEBT ADM20 – UEBT Sampling Methodology

UEBT documents can be received upon request to the UEBT Secretariat (see Contact information section at the end of the document).

4. TERMS AND DEFINITIONS

The terms and definitions provided in ISO/IEC 17000:2004, Conformity assessment, vocabulary and general principles apply, unless otherwise specified in the text or defined below.

In addition, the following definitions are applicable in this document.

Biodiversity management system: a set of policies, procedures, and practices designed to implement the Ethical BioTrade Standard and UEBT Membership Obligations at the level of the member organisation and its natural ingredient supply chains. (UEBT, 2012)

Ethical BioTrade Sourcing Targets: specific targets aiming to gradually align the biodiversity sourcing practices of a UEBT Trading Member with the UEBT Membership Conditions and Obligations. (UEBT, 2012)

First-party audit: audit carried out by an organisation of its own system.

Independent verification: External verification, also called third-party audit, carried out by trained auditor(s) of a UEBT qualified Verification Body.

Natural ingredient: for the purpose of the UEBT Membership Conditions and Obligations, ingredient that comes directly from plants or animals or that includes plant or animal inputs, even if these inputs have been significantly processed.

Organisation: entity responsible for the gradual application of the Ethical BioTrade standard through its management system and supply chains.

Second-party audit: audit carried out by a client of the organisation.

Stakeholder: person or organisation that can either be influenced or influence a project or initiative.

Third party: person or body that is recognized as being independent of the parties involved, as concerns the issue in question.

Note: Parties involved are usually supplier (“first party”) and purchaser (“second party”) interests. (ISO/IEC Guide 2:1996)

Third party audit: referred to Independent verification.

UEBT Trading Member: member that is directly involved in the supply chain of Ethical BioTrade goods and services (e.g. producer/collector organisations, processing companies, traders, manufacturing companies, brands, consortia of trading companies, research institutions, etc.).

Verification Body: Legal or administrative entity that has the specific tasks to operate independent certification and/or verification (adapted from ISO/IEC Guide 2:1996) that is duly qualified by UEBT.

4. REQUIREMENTS FOR BECOMING QUALIFIED VERIFICATION BODIES

4.1 General requirements

4.1.1 A Verification Body that seeks for UEBT qualification shall be accredited under ISO/IEC 17065 and/or ISO/IEC 17021.

The Verification Body is also strongly recommended to implement ISO 19011 (Guidelines for quality and/or environmental management systems auditing).

4.1.2 In addition to 4.1.1, a Verification Body that seeks UEBT qualification shall already be involved in other social and environmental schemes such as UTZ Certified, FLO, ESR (Ecocert), IBD EcoSocial, FSC, Sustainable Agriculture Network, ISO 9000, ISO 14000, etc.

4.1.3 A Verification Body that seeks UEBT qualification shall sign a Letter of Agreement with UEBT (see ADM01 - Generic Verification Body Agreement).

Note 1: Under specific circumstances, in order to allow a better understanding of the UEBT verification system, a Verification Body and the UEBT Secretariat may agree to undertake an independent verification before the agreement has been signed. This needs to be specifically approved by the UEBT Secretariat.

4.1.4 Lead auditor(s) selected by the Verification Body to work under the UEBT system shall have at least 3 years of experience in auditing. UEBT prefers to work with Lead auditors that have official and proven experiences in auditing management systems.

4.2 Structural Requirements

4.2.1 As stipulated in ISO 17021, qualified Verification Bodies shall adequately safeguard the impartiality of their activities.

4.2.2 Qualified Verification Bodies shall have a structure (in relation to their size) that ensures the fulfillment of the following functions:

- i. managing the UEBT verification/certification system;

- ii. conducting audits under the UEBT verification/certification system;
- iii. reporting on audits as required by the UEBT verification/certification system.

Note 2: Depending on the size of the Verification Body and the volume of the UEBT-related business; the roles of manager(s) and lead auditor(s) can be fulfilled by one person, or assigned to a team of people. This decision is up to the Verification Body.

4.2.3 The management of the UEBT Verification/Certification System within a qualified Verification Body shall:

- i. supervise the implementation of the UEBT Verification/Certification System within the Verification Body, e.g., getting the necessary information from potential clients and the UEBT Secretariat, developing quotes, developing contracts with clients, ensuring the quality of independent verifications and reports, including respecting deadlines for delivery, etc.;
- ii. always interact with the UEBT Secretariat, particularly when an independent verification is scheduled;
- iii. ensure that the qualified lead auditors are up-to-date with their training, as required by §4.3.

4.3 Human resource requirements

4.3.1 People filling in the different functions (UEBT Manager and Lead Auditor) within a qualified Verification Body shall:

- i. be fully trained auditors in the social and environmental scheme(s) (see §4.1.2) handled by the Verification Body;
- ii. have official and proven experiences in auditing management systems (see §4.1.4)
- iii. have successfully completed the training modules provided by the UEBT Secretariat

4.3.2 UEBT Managers shall be responsible for:

- i. the administrative and commercial proposals and follow-up with regard to its client (i.e. UEBT Trading Member or applicant Trading Member),
- ii. the quality of the independent verifications,
- iii. the deliverables to its client (UEBT member) and the UEBT Secretariat, etc.

4.3.3 Lead Auditors shall be responsible for:

- i. leading audits,
- ii. writing the audit reports and,
- iii. evaluating Ethical BioTrade work-plans

Note 3: The qualified Verification Body may work with an audit team. However, this is not a requirement from UEBT. This is up to the qualified Verification Body.

4.3.4 People filling in these functions within the qualified Verification Body shall have the knowledge and skills described in Table 1, in addition to the ISO 17021 and/or 17065 requirements.

Table 1: UEBT Manager and Lead auditor qualifications and competencies

Note: **X+** indicates a need for deeper knowledge and skills.

Functions Knowledge & skills	UEBT Manager	Lead Audit or	Competencies	Qualifications
General		X	Knowledge of management systems; Experiences in social and environmental standard schemes.	• CV, certificate, attestation, etc.

Knowledge of UEBT Membership process	X	X+	Demonstrate an understanding of the UEBT Membership application process and Conditions and Obligations	<ul style="list-style-type: none"> Passed the corresponding training chapter; Shows continuous understanding while in contact with the UEBT Secretariat.
Knowledge of UEBT Independent verification scope	X+	X+	Demonstrate an understanding of the independent verification scope of a UEBT Trading Member	<ul style="list-style-type: none"> Passed the corresponding training chapter; Correctly applies the corresponding requirements.
Knowledge of the UEBT audit protocol	X (At least all that refers to administrative process)	X+	Demonstrate an understanding of the UEBT audit protocol A correct use of the different tools (Ingredient Portfolio Assessment, sampling methodology, etc.) Ability to correctly interview stakeholders and the client respecting the individual and cultural situations	<ul style="list-style-type: none"> Passed the corresponding training chapter; Correctly applies the corresponding requirements; Work experiences; Supervised audits...
Knowledge of the Ethical BioTrade Standard	X+ (in view of reviewing the report before the UEBT Secretariat's review, when applicable)	X+	Demonstrate an understanding of the Ethical BioTrade Standard	<ul style="list-style-type: none"> Passed the corresponding training chapter; Shows correct interpretation of the standard through work experience, audit reports, etc.
Knowledge of the UEBT tools	X	X+	Demonstrate an understanding of all tools developed by the UEBT Secretariat whether they are aimed at Trading Members or Verification Bodies	<ul style="list-style-type: none"> Passed the corresponding training chapter; Shows correct interpretation of the tools through work experience, audit reports, etc.
Knowledge of client business sector and operations	X	X+	Demonstrate an understanding of the business sector in which the UEBT Trading Member works	<ul style="list-style-type: none"> Work experiences in this sector
Language skills appropriate to all levels within the client organisation		X	Ability to contract additional team members (local auditor, translators, etc.) in order to ensure that people speak the same language during the assessment.	

Note-taking and reporting skills		X+	Reports that: Respect the UEBT requirements; Reflect the findings; Are understood by the client and the targeted audience, etc.	<ul style="list-style-type: none"> • Work experiences; • Previous assessment reports
Presentation skills		X+		

4.3.5 The UEBT Manager shall:

- i. remain up-to-date with all the developments within the UEBT verification/certification system.
- ii. Successful completion of a relevant post-high school (post-secondary school) training courses such as such as Good Agricultural Practices (GAP), Integrated Pest Management (IPM) or organic production.
- iii. Successful completion of relevant lead auditor course (ISO 9000/9001, or ISO 22000, or ISO 14001) lead auditor course.
- iv. Experience in auditing or relevant standards (at least 10 audits days as auditor or trainee)
- v. Good working knowledge of English, or Spanish, or French or Portuguese.

Note 4: As mentioned further above, the UEBT manager can be a Lead Auditor.

4.3.6 Lead Auditors shall:

- vi. relevant UEBT E-Training modules;
- vii. participate in relevant face to face trainings or group trainings organised in the region
- viii. lead at least one independent verification/certification audit under the supervision of an experienced UEBT qualified Lead Auditor
- ix. remain up-to-date with all the developments within the UEBT verification system;

4.3.7 At the end of the supervised independent verification, the supervising Lead Auditor shall give its recommendations to the UEBT Secretariat with regards to the Lead Auditor qualification. The recommendation(s) shall be formulated through a formal letter addressed to the UEBT Secretariat. It also could request additional supervised independent verifications, more scrutiny from the UEBT Secretariat, etc.

4.3.8 The Lead Auditor shall receive a notification from the UEBT Secretariat informing him/her about qualification as Lead Auditor. He/she needs to remain up-to-date with these requirements to continue his/her qualification. The certificate has a validity of three (3) years upon compliance with above and with the continuous training when needed.

5. OBLIGATIONS FOR QUALIFIED VERIFICATION BODIES

5.1 General obligations

5.1.1 Qualified Verification Bodies shall remain compliant with the above requirements (§4).

5.1.2 Qualified Verification Bodies shall demonstrate commercial behaviour in line with the spirit of Ethical BioTrade.

5.1.3 The qualified Verification/Certification Body shall apply PRO24 – Independent Verification of Trading Members while auditing a UEBT Trading Member or Approved Candidate (hereafter organisation) or the applicable UEBT certification protocol when conducting certification audits.

- 5.1.4 The qualified Verification Body is only involved in the independent verification process and recommends the organisation to membership or certification. The membership/certification decision mechanism is then carried out by the UEBT Secretariat and the relevant UEBT Committees.
- 5.1.5 If there is any change in the team working on the UEBT verification/certification system, the qualified Verification/certification Body shall inform the UEBT Secretariat and ensure the new people are trained as described under §4.3 of the present document.

5.2 Independent verification preparation obligations

- 5.2.1 Before undertaking any formal independent verification or related activity for an organisation, the qualified Verification Body shall:
- i) first contact the UEBT Secretariat to inform them about the upcoming independent verification;
 - ii) seek up-to-date information, and in case of doubt ask support from the UEBT Secretariat;
 - iii) inquire with the UEBT Secretariat whether:
 - the organisation has been granted the status of Approved Candidate or is already a UEBT Trading member;
 - UEBT requests the qualified Verification Body to pay special attention on certain aspects of the Ethical BioTrade Standard;
 - UEBT has background information on the organisation that it can share with the qualified Verification Body to help it prepare the independent verification.
- 5.2.2 The qualified Verification Body shall ensure that its chosen lead auditor is well trained under the UEBT verification system and Ethical BioTrade Standard.
- 5.2.3 If the organisation has worked with another qualified Verification Body in its previous UEBT independent verification, the new selected qualified Verification Body shall communicate with the UEBT Secretariat and the previous qualified Verification Body to ensure that information is obtained and outstanding issues with the organisation are taken into account.
- 5.2.4 Before making a technical and financial proposition to the organisation, the qualified Verification Body shall have sufficient knowledge to ensure its proposal covers the necessary elements of the future independent verification, including at least the following elements:
- i) the Ethical BioTrade Standard;
 - ii) the UEBT verification system and its procedures; and
 - iii) the organisation business operations in relation to natural ingredients sourcing practices.
- 5.2.5 The qualified Verification Body shall ensure that its quote takes into consideration the audit requirements stipulated in the relevant UEBT verification/certification protocols.
- 5.2.6 The quote of the qualified Verification Body shall contain at least the following items, in addition to the usual items of the Verification/Certification Body's procedure:
- i. Details of the independent verification/certification scope
 - ii. Details of the audit protocol, e.g. documentation review, interviews, field visit, where appropriate, etc.;
 - iii. Reporting obligations and tentative timelines;
 - iv. Fee schedule;
 - v. Next contract agreement steps, etc.
- 5.2.7 The quote shall specify the audit costs (including number of days and daily fees), broken down in the categories; preparation, independent verification, reporting, workplan approval, transport & accommodation.
- 5.2.8 If a team of auditors is involved in the independent verification, the Verification Body shall provide the relevant details in the quote in terms of justification (e.g. use of experts, internal

Verification Body procedure, use of translators, etc.) and in the fee schedule for the item “independent verification”.

5.2.9 The qualified Verification Body shall ensure consistency in its quotes among its UEBT clients (i.e. UEBT Trading Members).

5.2.10 When the Verification Body uses translators during the assessment, the translators shall be independent of the audited organisation. If this is not feasible, the lead auditor shall include the name and affiliation of the translators with the audited organisation in the audit report.

5.2.11 The lead auditor shall be correctly prepared to undertake the audit.

This preparation phase should include, in addition to the usual work detailed in ISO 17021 or ISO 17065, the following:

- i) understanding of the organisation business operations in relation to natural ingredients sourcing practices;
- ii) understanding and use of the independent verification work as detailed in the applicable audit protocol
- iii) Preparation of a Draft list of people that should attend the audit or part of it (see § 5.2.13);
- iv) preparation of a Draft list of potential documents to be asked and reviewed during this assessment

5.2.12 The lead auditor shall determine audit time according to ISO17021 or ISO17065 and its experience with the UEBT verification system.

5.2.13 The lead auditor shall make sure that the relevant persons from the organisation are available for the audit.

5.2.14 The auditor shall share with the organisation an audit plan at least one (1) week before the audit.

The audit plan should be reviewed and accepted by the organisation. The audit plan should facilitate scheduling and coordination of the audit activities. The amount of detail provided in the audit plan should reflect the scope and complexity of the audit. The audit plan should cover the following¹:

- i. the audit objectives (Membership, Subsequent independent verification, (Re-)Certification etc.);
- ii. the audit criteria and any reference documents (e.g. STD01 – Ethical BioTrade Standard, Applicable checklists);
- iii. the audit scope, including identification of the organisational and functional units and processes to be audited;
- iv. the dates and places where the on-site audit activities are to be conducted;
- v. the expected persons to attend the audit (R&D department, Quality department, Purchase, etc.);
- vi. the expected time and duration of on-site audit activities, including meetings with the organisation’s management and audit team meetings;
- vii. the roles and responsibilities of the audit team members and accompanying persons, when appropriate;
- viii. the allocation of appropriate resources to critical areas of the audit, when relevant.

The audit plan should also cover the following, as appropriate:

- i. identification of the organisation’s representative for the audit;
- ii. the working and reporting language of the audit where this is different from the language of the auditor and/or the organisation;
- iii. the audit report topics;
- iv. logistic arrangements (travel, on-site facilities, etc.);

¹ Source: ISO/IEC 19011:2011 - Guidelines for quality and/or environmental management systems auditing

v. matters related to confidentiality.

5.2.15 The lead auditor shall ensure access to relevant and reliable information to do the work correctly and in a timely manner.

5.3 Contract agreement requirements

5.3.1 A contract shall be signed between the organisation and the qualified Verification Body that contains at a minimum the elements listed below:

- i. A clause of confidentiality that all participants in the independent verification process shall abide to and sign, including lead auditor, auditors, observers and any person in the Verification Body who will have access to the reports.
- ii. Clauses that reflect the independent verification process and timelines, and the Verification Body reporting obligations.
- iii. Any additional clauses that are relevant for this process, e.g. translations needs, etc.

5.4 Independent verification obligations

5.4.1 The lead auditor shall conduct an opening meeting, of which attendance shall be recorded, shall be held with the organisation's management and the relevant persons to properly conduct the UEBT independent verification. The opening meeting shall include, in addition to the requirements of ISO17021 and/or ISO 17065, the following:

- i. briefly introduce the UEBT and the Ethical BioTrade Standard to make sure all people have the same level of minimum information about the ongoing process;
- ii. introduce its audit team, when relevant, with the role of each ones;
- iii. approval of the audit plan.

5.4.2 The lead auditor shall conduct the independent verification in its integrity.

5.4.5 The independent verification shall take place through observation of activities and processes (where relevant), documentation review and interviews with, at least, the people of the organisation involved in UEBT membership, natural ingredients' sourcing and those linked to items addressed by the Ethical BioTrade Standard.

5.4.6 The lead auditor shall apply the UEBT scoring system as required by the relevant protocols.

5.4.7 The lead auditor shall conduct the closing meeting, for which attendance shall be recorded, and which shall be held with the organisation's management and the relevant persons who participated in the UEBT independent verification.

5.5 Reporting obligations

5.5.1 In case of a membership audit: No later than **seven (7) days after the end of the independent verification**, the qualified Verification Body shall submit to the UEBT Secretariat, with copy to the organisation, the Attestation of Conformity with the Entry Indicators included in the Audit Report. (ADM03 - Audit Report Template; PRO24 – Independent Verification of Trading Members.

5.5.2 **One (1) month after the independent verification**, the qualified Verification Body shall send a Draft audit report to the UEBT Secretariat. The UEBT Secretariat reviews every audit report in the framework of continuous improvement of its lead auditors pool while receiving the Draft report. Without interfering in the independent assessment judgment of the auditor, there might be feedback from the UEBT Secretariat to the qualified Verification/Certification Body regarding reporting format and the interpretation of the Ethical BioTrade Standard.

5.5.3 **Two (2) months after the independent Verification/Certification** the qualified Verification/Certification Body shall send to the (Provisional) Trading Member the final audit report with copy to the UEBT Secretariat,

- 5.5.4 In case of a membership audit: The lead auditor shall review and approve the Ethical BioTrade Work-Plan developed by the organisation according to PRO25 – Ethical BioTrade Work-Plan. Its approval should take into consideration the feasibility of the Work-Plan in terms of timelines and budget wise. As well, whether the Ethical BioTrade Work-Plan responds to the weaknesses identified in the audit report in order to ensure progress.
- 5.5.5 **Four (4) months after the independent Verification/Certification**, the qualified Verification/Certification Body shall submit to the UEBT Secretariat and the organisation:
- i) the final full and public version of the audit report according to the UEBT audit report template (ADM03 – Audit Report Template, PRO24 – Independent Verification/Certification of Trading Members)
 - ii) the approved 3-year Ethical BioTrade Work-Plan (in case of membership audit)
 - iii) the letter for approval of the Work-Plan (in case of membership audit)

6. UEBT OVERSIGHT

- 6.1 As part of the UEBT oversight mechanism, the qualified Verification/Certification Body shall share every independent Verification/Certification report with the UEBT Secretariat before sending it to the client (i.e. UEBT Trading Member) – Ref. § 5.6.2. This allows the UEBT Secretariat to ensure reporting quality and continuous qualified Lead Auditor’s understanding on the UEBT system (e.g. Ethical BioTrade Standard, scoring system, etc.).
- 6.2 UEBT has the right to request additional information, conduct shadow audits and unannounced audits as part of it’s quality control program.

7. NON-COMPLIANCE

- 7.1 Qualification may be suspended in case of lack of compliance with these requirements and obligations.
- 7.2 Verification/Certification Bodies that lose their qualification are taken off from the list of Verification/Certification Bodies on the UEBT website and may not undertake any UEBT Independent Verification/Certifications.
- 7.3 Qualification may be reinstated by the UEBT Secretariat when Verification/Certification Bodies regain compliance with these requirements. Verification/Certification Bodies have up to six (6) months to regain compliance.
- 7.4 If, after this timeframe, the Verification/Certification Body remains non-compliant, it shall sign a new Letter of Agreement with UEBT and redo the qualification process described in section 4 of this document before undertaking any UEBT independent Verification/Certification.

8. CONFIDENTIALITY

- 8.1 UEBT shall treat information received from Verification/Certification Bodies in fulfillment of these requirements as confidential, unless it concerns information that is already public, is contained in public documents or is clearly highlighted for public distribution.

9. CONTACT

- 9.1 Verification/Certification Bodies interested in being qualified by the UEBT should contact the UEBT Secretariat by email at (verification@ethicalbiotrade.org) or at the address provided below. The UEBT Secretariat will provide the necessary practical information.
- 9.2 Any enquiry about this procedure of the Union for Ethical BioTrade should be addressed to:

Union for Ethical BioTrade - Secretariat
De Ruyterkade 6
1013 AA Amsterdam

Netherlands

Or via email: info@ethicalbiotrade.org