



# **UEBT Certification Protocol**

## *Internal Monitoring System Certification Approach*

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## 1. Introduction

### 1.1 The UEBT Certification Program for complex Supply Chain Structures

The UEBT Certification Program is intended for UEBT Trading Members<sup>1</sup> (herein after referred to as “UEBT Members”) that buy natural ingredients originating from several sources, sometimes from fragmented supply chains, and which systematically and closely monitor their supply chains with regard to Ethical BioTrade production and sourcing practices.

The UEBT Certification Program allows UEBT Members to make certification claims for selected Ingredients that originate from fully monitored supply chains that are in compliance with the requirements of the UEBT Ethical BioTrade Standard.

For the purpose of the certification program, UEBT applies a comprehensive field checklist to facilitate the verification of Ethical BioTrade requirements at Source. Incorporated in the Field Checklist is also a Scoring System to provide critical guidance for the compliance assessment.

The assurance scheme of this Certification Program consists of two main components: The Internal Monitoring System and the External Control System.

The Internal Monitoring System (IMS) is to be implemented and operated by the UEBT Member in order to monitor the production and sourcing practices in the supply chains that have been selected for the certification and to demonstrate their compliance with the Ethical BioTrade Standard. To establish an IMS, the UEBT Member shall have qualified and dedicated staff.

In addition to establishing an IMS, UEBT Member agrees to participate in an External Control System (ECS) to demonstrate that all requirements of the UEBT Certification system have been complied with. For this purpose, on-site audits will be conducted at the level of the UEBT Member and of critical organizations and Field Operators at Source. The audits are done by third-party auditors from UEBT approved Certification Bodies.

### 1.2 Eligibility

The UEBT Certification system is open to all UEBT Members that acknowledge and adopt the requirements of the UEBT Ethical BioTrade Standard. UEBT Members that can demonstrate that their internal standard(s) is/are equivalent to the Ethical BioTrade Standard and that their supplier scoring system delivers comparable results as the respective UEBT scoring system are also eligible. Such equivalency is subject to review by UEBT and must apply to all Natural Ingredients originating from the selected supply chains that are part of this certification program.

### 1.3 Application

UEBT Members<sup>2</sup> wishing to participate in the UEBT Certification Program must submit a completed application form (*Application Form for UEBT Certification*<sup>3</sup>) to UEBT and provide detailed information related to the selected Supply Chains and Natural Ingredient(s) which they intend to include in the certification program, as well as other relevant information outlined in the application form.

### 1.4 Conditions for Certification

In order to qualify for the UEBT Certification – Internal Monitoring System Certification Approach, the UEBT Member must:

- 1) Be a UEBT Trading Member and be up-to-date with all UEBT Membership requirements.
- 2) Have an IMS in place which complies with the UEBT requirements outlined in this document.
- 3) Have a traceability system in place for all selected supply chains and comply with the traceability requirements outlined in this document (see Addendum V “Outline of Traceability Requirements”).
- 4) Follow the guidelines for ABS assessment (see Addendum VI “Access and Benefit Sharing (ABS)”) for the Ingredients falling under the certification program.
- 5) Adhere to the UEBT Claims and Communications guidelines regarding the UEBT Certification.

### 1.5 Authority

The overall credibility of the UEBT Certification Program depends on the full and reliable cooperation of the UEBT Member. For this purpose Senior Management of the UEBT Member must appoint a UEBT Coordinator and approve in writing the Standards, Policies and Procedures which govern the UEBT Certification Program.

### 1.6 Scope of the Certification

In the event of a successful certification process, the UEBT Member will be the Certificate Holder and as such the overall responsible for the certification. The scope of the certification is determined by the scope of the UEBT Member’s IMS, namely by the supply chains that are included in, and monitored by, said system, and for which the UEBT Member requests the certification. These supply chains are herein called “**Supply Chains**” and are to be distinguished from other supply chains which the company might work with, but which are not covered by the IMS for the purpose of the UEBT Certification Program.

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<sup>2</sup> Companies that are not UEBT Members and that wish to join can find all information regarding the application process for UEBT Membership on the UEBT website:

<http://ethicalbiotrade.org/membership/application-process/>

<sup>3</sup> The application form can be requested at [certification@uebt.org](mailto:certification@uebt.org).

**A Supply Chain** consists of specific ingredient(s) (referred to as “Ingredient(s)” further in this document) originating from **Field Operators** that are managed by an **Organization at Source**.<sup>4</sup>

**Field Operators** are individuals (producers/collectors) or groups of individuals directly involved in the cultivation and/or collection of the Ingredients. They are considered the ‘smallest unit’ for the purpose of the monitoring activities.

**Organizations at Source** are the units that manage the cultivation and/or collection activities of the Ingredients to be certified. They are directly responsible for ensuring compliance with the UEBT Ethical BioTrade Standard requirements applicable to them (management system requirements), and, directly or indirectly, for those applicable to the Field Operators (field level requirements) that they manage.

UEBT Members applying for the UEBT certification must determine its scope by identifying and defining the elements above for each of the supply chains to be included in the certification. This is important, in particular, as these establish the scope for the monitoring and auditing activities of the UEBT Certification Program:

- The UEBT Member (Certificate Holder) is subject to external audits.
- Field Operators and Organizations at Source are subject to both (internal) Monitoring visits and external audits.

In addition, UEBT Members must identify all service organizations involved in the Supply Chains which manipulate the Ingredients in terms of drying, cleaning, mixing, extraction, (re-) packing, or any other activity that change the structure or form of the product. These must comply with the UEBT traceability requirements while the Ingredients are in their possession, and thus they must agree to Monitoring visits and external audits when necessary. Service organizations that only handle (but do not manipulate) the Ingredient, such as warehousing, cold storage, transport, shipping, etc. are exempt from the monitoring and auditing requirements.

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<sup>4</sup> See Glossary and Addendum VII “Supply Chains, Field Operators and Organizations at Source” for further explanation of these elements.

## 2. Internal Monitoring System

### 2.1 Regulatory framework for the IMS

#### 2.1.1 Adopting UEBT Policies and Procedures

The UEBT Certification Program is based on the policies and procedures as outlined in this document. The applicable standard for the certification is the UEBT Ethical BioTrade Standard. The UEBT Field Checklist and Scoring System<sup>5</sup> are used for assessing compliance of the Supply Chains against the Ethical BioTrade Standard.

UEBT Members may use their own Standard, Field Checklist and Scoring System if they are accepted by UEBT as equivalent to those of UEBT<sup>6</sup>.

#### 2.1.2 Equivalency of Standards

##### Policy

UEBT Members may already have established standard(s), codes of conduct and/or guidelines as part of their IMS, which they request their suppliers to comply with, and on the basis of which they conduct the monitoring activities. In these cases, UEBT may recognize a UEBT Member's standard(s) as equivalent to the UEBT Standard requirements, provided that they include all relevant Ethical BioTrade Standard requirements and that the equivalency of the standards has been confirmed by UEBT.

For this purpose, the UEBT Member shall demonstrate that their own standard(s), codes of conduct and/or guidelines for the production and sourcing activities of their suppliers are equivalent to the requirements of the UEBT Ethical BioTrade Standard. The standard equivalency shall be achieved by comparing the UEBT Field checklist with the compliance requirements established by the UEBT Member.

In the event of any discrepancies and/or disputes arising from such a comparison, the specifications outlined in the UEBT Ethical BioTrade Standard will prevail.

##### Procedure

The UEBT Member compares their own list of compliance requirements for suppliers with the UEBT Field Checklist to assess the equivalency of the two documents. For this purpose, the UEBT Member correlates each of the verifiers of the UEBT Field Checklist with their own compliance requirements, also taking into account their respective relevance<sup>7</sup>. To demonstrate equivalency, the UEBT Member submits a comparison document to UEBT, which clearly identifies each of the UEBT requirements and relevance in correlation to the Member's requirements and relevance, and indicates, if necessary, the action taken to ensure equivalency. The 'UEBT Template for establishing equivalency of standards shall be used for this purpose.

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<sup>5</sup> See Addendum VIII "Description of the UEBT Scoring System".

<sup>6</sup> The process for determining equivalency is described in the Policies "Equivalency of Standards" and "Equivalency of the Scoring System".

<sup>7</sup> Relevance determines the importance/weight of the requirements, i.e. whether they are critical (i.e. major, must), regular (i.e. minor, should), optional, or other.



UEBT reviews the comparison document for approval of the standard equivalency. If the approval is granted, UEBT authorizes the UEBT Member to use their own list of compliance requirements for monitoring their suppliers for the purpose of certification.

UEBT shall charge the member company for the time dedicated to this equivalence review.

In the event that a Standard revision takes place and a new version of the UEBT Ethical BioTrade Standard is applicable, a new approval of standard equivalency is required. The timelines for adopting the new Standard will be equally applicable to all UEBT Members.

### 2.1.3 Equivalency of the Scoring System

#### Policy

The UEBT Certification is based on the UEBT Scoring System to determine the levels of compliance with the Ethical BioTrade Standard requirements.<sup>8</sup>

In practice, some UEBT Members may already be applying, or prefer to apply, they own scoring system for their monitoring activities. For practical purposes, this scoring system can be used for the certification, provided that the UEBT Member can demonstrate the equivalency of the systems, and that it is confirmed and approved by UEBT.

In the event of disputes, the results obtained under the UEBT scoring system will prevail.

#### Procedure

The UEBT Member compares their existing scoring system with the UEBT Scoring System to establish equivalency. For this purpose, the UEBT Member establishes several scoring scenarios in order to demonstrate, for each of the scenarios, that the final scoring results achieved with their own scoring system are equivalent to those that would have been achieved in the same or similar scenarios with the UEBT Scoring System<sup>9</sup>. The relevance<sup>10</sup> of the compliance requirements needs to be taken into account.

The UEBT Member submits a comparison document to UEBT, which clearly describes the comparison exercise and results, and which indicates the action taken to ensure equivalency, if applicable.

UEBT reviews the document for approval. If the approval is granted, UEBT authorizes the use of the UEBT Member's own scoring system as part of their IMS for the purpose of certification.

UEBT shall charge the member company for the time dedicated to the scoring system equivalence review.

In the event that the UEBT Ethical BioTrade Standard is revised, the Scoring System needs to be reviewed and approved accordingly.

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<sup>8</sup> For further information on the UEBT Scoring System, see Addendum VIII "Description of the UEBT Scoring System".

<sup>9</sup> E.g. full compliance, partial compliance, non-compliance, not applicable

<sup>10</sup> Relevance determines the importance/weight of the requirements, i.e. whether they are critical (i.e. major, must), regular (i.e. minor, should), optional, or other.

## 2.2 Policies regulating the Establishment of an IMS

The IMS as defined by UEBT refers to a supplier evaluation system that goes beyond physical product criteria, as well as economic or logistics considerations. It refers to a monitoring system that ensures that Natural Ingredients are produced and sourced in compliance with the requirements of UEBT's Ethical BioTrade Standard.

UEBT Members seeking to participate in the UEBT Certification Program need to implement a functioning IMS.

The IMS will consist of similar elements as a third party auditing system, such as standards, audit checklists, policies and standard operating procedures. It's main difference being that it will be operated by personnel of the UEBT Member in order to verify practices of its suppliers upstream.

The UEBT Member needs to demonstrate that their IMS meets all UEBT requirements as outlined in the following chapters.

### 2.2.1 General Specifications

#### Scope

The IMS is applied to individuals or groups of individuals at field level (*Field Operators*) from which the certified Ingredient(s) originate(s), as well as the organizations that manage these Field Operators (*Organizations at Source*). The UEBT Member must identify and register all Ingredients and respective Field Operators and Organizations at Source for which certification is sought.

All service organizations or organizations that take ownership of certified Ingredients that physically manipulate the Ingredients (e.g. pack, re-pack, process, or alter the raw ingredient in any way) must also be identified and are subject to traceability verification.

#### Compliance Requirements

The UEBT Certification is based on the Ethical BioTrade Standard. The UEBT Field Checklist comprises all relevant requirements of the Ethical BioTrade Standard that apply to supply chain actors at field level participating in the UEBT certification program. The UEBT Field Checklist must be an integral part of the UEBT Member's IMS and be used for the Monitoring activities being conducted for the purpose of certification. *Alternatively, an own standard and respective checklist can be used, as long as these have been previously approved by UEBT as equivalent to the UEBT Standard and UEBT Field Checklist.*<sup>11</sup>

#### Scoring System

The UEBT Field Checklist contains a Scoring System (see Addendum VIII "Description of the UEBT Scoring System"), which is used to score each of the applicable verifiers contained in the checklist and which determines the overall level of compliance of the Organization at Source being assessed. The UEBT Scoring System establishes the minimum level of compliance required for an Organization at Source to be eligible for certification and thus forms the basis for the decision making process within the IMS.

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<sup>11</sup> See Policies: 2.1.2 Equivalency of Standards and 2.1.3. Equivalency of the Scoring System

The UEBT Member must apply the UEBT Scoring System for the Monitoring activities conducted for the purpose of certification. Alternatively, they UEBT Member may use their own scoring system, provided that these are approved by UEBT as equivalent to the UEBT Scoring System.<sup>12</sup>

In either case, the UEBT Member is further responsible for promoting continuous improvement of the Ethical BioTrade practices in their Supply Chains. The UEBT Member must demonstrate that there are mechanisms in place for this purpose.

### 2.2.2 Allocation of resources

The UEBT Member agrees to make adequate resources available to implement and operate a reliable IMS. The UEBT Member will appoint a skilled and experienced person within their own organization (UEBT Coordinator at Member), who is authorized and responsible to implement the IMS for Supply Chains. This person acts as a liaison between UEBT and the respective organization(s) involved in the sourcing of the Ingredient. Further personnel may be needed for conducting the on-site monitoring activities (Internal Monitoring Personnel). The UEBT Coordinator at Member and Monitoring Personnel must receive induction training in the requirements of the UEBT Ethical BioTrade Standard and the UEBT Certification Program.

The UEBT Member will formally assign responsibility to a skilled and experienced person to implement UEBT requirements at Organization at Source and Field Operator level (Local Manager at Source). This person may belong to the Organization at Source involved in the Supply Chain and acts as a liaison between the UEBT Member and the respective Organizations at Source and Field Operator(s). The person will also be the primary contact during on-site audits conducted by third parties and may act as an indirect contact for UEBT.

The UEBT Member and the Organizations at Source must provide the appointed persons with the necessary resources (in terms of additional staff, time and money) to carry out the necessary activities to ensure compliance with the UEBT requirements.

In addition, depending on the complexity of the supply chains, it may be necessary to establish a Local Monitoring System at the level of an Organization at Source, analogous to the IMS. This is the case when the sourcing area is under the ownership/management of several individual Organizations at Source and/or Field Operators and when the Internal Monitoring Personnel at UEBT Member can no longer conduct sufficient and adequate on-site monitoring with the available resources, or if the UEBT Member considers it more viable to delegate the monitoring activities to the local level.<sup>13</sup> In this case, a qualified person who is responsible for the Local Monitoring System must be appointed locally (Local Coordinator at Source).

### 2.2.3 Management of Field Operators at Source

#### Policy

The UEBT Member and Organizations at Source must ensure that all Organizations at Source and Field Operators understand and comply with the requirements of the Ethical BioTrade Standard. In this context a structure must be in place at source that allows for continuous management of the Organizations at Source and Field Operators. A qualified person (Local Manager at Source) must be appointed locally for this purpose.

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<sup>12</sup> See Policies: 2.1.2 Equivalency of Standards and 2.1.3 Equivalency of the Scoring System

<sup>13</sup> See Policy 2.2.4 Establishing Local Monitoring Systems

All Organizations at Source included in the UEBT Certification Program must confirm in writing their willingness to participate in the program and to adhere to the respective UEBT requirements applicable to them.

### Procedure

The UEBT Member must make sure that there is a local structure in place with suitable personnel that has the necessary authority and resources to manage the implementation of the requirements of the UEBT Standard at source. This may be achieved by:

1. Assigning the tasks of organizing Field Operators to a person from an existing organization being part of the Supply Chain (Organization at Source).
2. Utilizing the services of an existing organization at Source that is not part of the Supply Chain.

In either event, a qualified person (Local Manager at Source) is contractually appointed who is responsible for ensuring compliance of the Standard requirements both by the Organization at Source (management system requirements) and the Field Operators (field level requirements).

The Local Manager at Source is responsible for:

- Maintaining an up-to-date list of all Field Operators that are included in the certification program and managed by the Organization at Source.
- Ensuring (e.g. through training, verbal or written instructions, manuals, or other) that Field Operators are sufficiently informed and capable of meeting the UEBT certification requirements.
- Ensuring that the Organization at Source meets the UEBT certification (management system) requirements applicable to them. *This includes performing data collection and record keeping of relevant information and documentation, ensuring product traceability downstream, and other.*
- Ensuring that corrective measure requests (applicable to the Organization at Source and/or Field Operators) are implemented within the specified timeframe.
- Facilitating any Monitoring visits and external audits conducted for the purpose of certification.

The Local Manager at Source is the main contact person to the UEBT Coordinator at Member for all certification-related issues concerning the Supply Chain in which the Local Manager operates.

### **2.2.4 Establishing Local Monitoring Systems**

In general, Local Managers at Source have the responsibility to ensure, on a continuous basis, that the Organization at Source and the Field Operators they manage are in compliance with the requirements of the Ethical BioTrade Standard. Whereas the UEBT Member, through its IMS, has the responsibility to monitor the performance of the Organizations at Source and Field Operators with regard to the requirements of the Ethical BioTrade Standard. However, depending on the complexity of the supply chains and number of Field Operators at Source, it may be decided to establish a Local Monitoring System analogous to the IMS of the UEBT Member level. This is the case when the UEBT Member does not have the capacity (due to lack of resources, insufficient local knowledge, or other) to conduct full monitoring of the Field

Operators, or considers a Local Monitoring System to be a more viable option to ensure better integrity and transparency of the system.

The purpose of a Local Monitoring System is to support the UEBT Member's IMS by taking over monitoring functions and performing monitoring activities complementary to those performed by the Monitoring Personnel.

### Policy

A Local Monitoring System may be established at Source to complement the work of the IMS of the UEBT Member. This system may be integrated into existing organizational structures at Source in which the Field Operators participate, or be established external to the existing structures. In all cases, the Local Monitoring System shall be an extension of the IMS of the UEBT Member and shall be accountable to the UEBT Member.

The need for establishing a Local Monitoring System may be initiated by UEBT, the UEBT Member, or an Organization at Source that is responsible for managing Field Operators.

### Procedure

The UEBT Member selects and appoints a qualified person (Local Coordinator at Source), from a suitable local organization, who is responsible for establishing and operating the local Monitoring System.

The Local Coordinator at Source defines, in coordination with UEBT Coordinator at Member, the rules and procedures for the local monitoring activities. These must be established in such way that they complement (or partly replace) the tasks that would usually have been undertaken by the IMS of the UEBT Member. Thus, the procedures must be in line with - but not necessarily be identical to - the rules established by the IMS. The rules and procedures of the LMS are subject to approval by the UEBT Member.

In minimum, the Local Monitoring System must ensure that:

- There is a systematized approach for performing on-site Monitoring visits. The process and the outcomes of the Monitoring visits as well as any measures resulting from monitoring activities are documented and kept in record.
- The monitoring activities cover all relevant standard requirements that are applicable to the respective level and circumstance.
- The frequency and scope of the Monitoring visits correspond to those established by the IMS.
- The personnel conducting the Monitoring visits have the necessary skills, and have received the necessary training to do so.

The Local Coordinator at Source must ensure that the defined rules and procedures for the Local Monitoring are met and performed accordingly. It is further the responsibility of the Local Coordinator to ensure that all relevant information regarding the monitoring activities, in particular relevant findings (non-conformities) and any issues that might compromise the "compliant" status of the Organization at Source and/or Field Operators, are communicated to the UEBT Coordinator at Member proactively and in a timely manner.

For practical reasons, the Local Monitoring System may be integrated in the same Organization at Source managing the Field Operators, i.e. the tasks of the Local Manager and Local Coordinator at Source may coincide in one person or department. In this case, the organization

must undertake all possible measures to avoid any conflict of interest when fulfilling these tasks. Ideally, the person(s) conducting the monitoring activities should not be the same as the person(s) directly advising the Field Operators. If this is not possible, other measures, such as a rotation scheme, peer review, systematized quality controls of the Monitoring visits, or other measures should be introduced in order to minimize the risks related with conflicts of interest.

## 2.2.5 Performing Risk Assessments of Supply Chains

### Policy

For the purpose of certification, the UEBT Member shall assess, for each Supply Chain (or subsection thereof), any environmental and social risks that may pose a threat to the integrity of the claim linked to the UEBT Certification Program<sup>14</sup>.

### Procedure

The UEBT Coordinator at Member must assess the risks of each Organization at Source related to the requirements of the UEBT Certification Program. This counts for:

#### A) Requirements directly related to production, processing and sourcing activities

Particular attention must be given to all situations in which the ethical and responsible sourcing of the ingredients may be jeopardized. In this context the UEBT Coordinator shall take into account the following potential risks when conducting the assessment:

- Risks to the environment and biodiversity, in particular sensitive/ endangered/ protected areas and species.
- Risks to the people involved in, or affected by, activities related to the Supply Chains, in particular producers, collectors and local communities.
- Risks to the integrity of the business, e.g. risks related to compliance with local legislation and international regulations.
- External parameters such as country-specific or ingredient-specific risk factors must also be taken into account.

#### B) (Local) Monitoring and Management System requirements

Situations that no longer allow regular adequate management and/or ongoing Monitoring visits of all participating Organizations at Source and Field Operators need to be rated as a risk factor.

#### C) Traceability requirements

The Supply Chain structures must be assessed with regard to possible risks related to traceability or product identification of the ingredients subject to the certification.

The Coordinator at Member must ensure that the risk assessments are reviewed at least every 5 years and whenever relevant changes occur that may affect the assessment results. Results of the risk assessments must be documented. Any known risks must be communicated to the UEBT Manager at the time of application for certification or re-certification.

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<sup>14</sup> Risks purely associated with the physical quality of the Ingredient are not considered under this Policy.



The risk assessment may include other elements relevant to the UEBT Member's business (e.g. product quality, satisfaction of service) as long as the elements listed above are taken into account and adequately considered.

## 2.2.6 Traceability Requirements

### Policy

The UEBT Member must have a system in place that ensures compliance with the UEBT Traceability requirements<sup>15</sup>. Critical control points in the supply chains must be identified and monitored for this purpose. Critical control points for traceability include all organizations involved in the Supply Chains which manipulate the Ingredients in terms of drying, cleaning, mixing, extraction, (re-) packing, or any other activity that change the structure or form of the product.

These are also subject to external audits for traceability verification.

### Procedure

The UEBT Member must ensure that a traceability system is in place and functioning at all levels in the Supply Chains. The UEBT Member must advise relevant personnel (procurement, purchasing, receiving goods, etc.) to ensure that traceability requirements are met and that the required information and documentation is provided and recorded. The UEBT Coordinator at Member must instruct Monitoring Personnel to monitor the critical control points with regard to compliance with the UEBT traceability requirements.

## 2.2.7 Delegation of responsibilities from the Organization at Source to the UEBT Member

### Policy

In some cases the UEBT Member may take responsibility for implementing UEBT Ethical BioTrade Standard (system) requirements on behalf of Organizations at Source. The UEBT Member must then ensure compliance with these requirements.

### Procedure

UEBT Coordinator at Member actively informs UEBT, prior to the external audit at UEBT Member, if and which requirements applicable to the Organization at Source (system requirements) are taken over by the UEBT Member. The UEBT Coordinator ensures that these requirements are in place and functioning. The system requirements will be subject to UEBT external control audits, and evidence of compliance with these requirements must be made available to the external auditors during these audits.

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<sup>15</sup> See Addendum V "Outline of Traceability Requirements"

## 2.2.8 Documentation and Record Keeping

### Policy

The UEBT Member must have a record keeping system in place to ensure that all processes and decisions related to the UEBT Certification Program are documented in time and in a comprehensible manner.

### Procedure

The UEBT Coordinator at Member is responsible for ensuring that all policies, procedures, processes, activities and decisions relevant for the UEBT Certification Program are duly recorded and made available to Monitors, Auditors and other interested party for their use or review. These include, among others:

- Documentation related to the Monitoring process, such as Monitoring visit reports, follow-up process and outcome, decision-making process and relevant decisions taken, etc.
- Risk-assessments
- New appointments of IMS staff, including Monitors,
- Training and performance evaluation material of IMS staff
- Documentation related to any deviations from the UEBT Certification Program or Standard requirements.
- Communication and documentation regarding disputes, grievances, deviations from regular procedures, and any other information that might have important implications for the assurance process.

The UEBT Coordinator at Member ensures that such documentation is kept for a period of 5 years.

## 2.3 Policies regulating the Internal Monitoring Process

### 2.3.1 Planning and Preparation for on-site Monitoring Visits

#### Policy

The UEBT Member shall ensure that Monitoring visits are adequately prepared for and that sufficient resources in terms of personnel and time are allocated in order to conduct meaningful on-site visits of Organizations at Source.

#### Procedure

UEBT Coordinator at Member makes sure that sufficient detailed information about the organizations to be monitored at source is available well in time for the on-site monitoring visit. UEBT Coordinator at Member must review above information to ensure that it is complete and comprehensible.

UEBT Coordinator at Member also reviews any previous monitoring reports and any follow-up of corrective measure requests (if applicable).



Based on the review, UEBT Coordinator at Member determines the scope and focus of the monitoring visit.

When determining the period of the Monitoring visits, the UEBT Coordinator at Member should take into account, as far as possible, factors that facilitate the monitoring activities, such as harvest periods, labor-intensive periods, periods when activities of elevated risk (e.g. to health, to the environment, to product safety) take place, and other. Results of the Risk Assessments should also be taken into account when determining the dates of the visits.

Prior to the Monitoring visits, visit plans with clear indication of the objective, dates and times, specific activities and involved persons must be prepared for every monitoring visit conducted, and be submitted to the contact person at the Organization at Source at the latest one week prior to the audit for review.

#### Work instructions

The UEBT Coordinator at Member ensures that the information required prior to an on-site monitoring visit comprises at a minimum for each entity to be visited:

- Background information about the organization being audited: Type and structure of the organization (including all production and processing sites as well as sub-suppliers), location (full address), and types of production and processing;
  - Information about the contact person(s) and other relevant personnel (including their roles and functions);
  - Other relevant supply chain actors including intermediary companies involved in the sourcing of the ingredient(s) subject to certification;
  - Distances between production sites, as well as to and between field operators, etc.;
  - Results of previous audit, results of risk assessment;
- Relevant information about the Natural Ingredient(s) being assessed (i.e. particularities of the crop(s), good agricultural practices, particular threats linked to the production/sourcing of the crop(s));
- Relevant information regarding the audit location/sourcing area (i.e. local rules and legislation, relevant political factors, situation regarding local/indigenous communities, particularities of the ecosystem and biodiversity in the area etc.).

In the event that any relevant information is missing, incomplete or unclear, the UEBT Coordinator at Member will request additional information and/or further explanation.

After reviewing all relevant information, the UEBT coordinator appoints suitable Monitoring Personnel and allocates sufficient time to conduct the respective Monitoring visits. Local knowledge, specific technical expertise and language skills are to be taken into account when allocating the Monitoring Personnel. When necessary, a monitoring team should be assigned in order to assure a complete and sound monitoring visit. The process for assigning the Monitoring Personnel and for calculating the times needed for the Monitoring visits is clearly defined and documented.

The UEBT Coordinator at Member ensures that the Monitoring Personnel have all necessary and relevant information for conducting the Monitoring visits. The UEBT Coordinator at Member also provides clear guidance regarding the scope of the audit, and points out any issues that might require special attention during the on-site visits.

Either the UEBT Coordinator or the assigned Internal Monitor prepares and submits to the contact person at the Organization at Source, at least one week prior to the visit, a monitoring visit plan. Adaptations to the plan can be made (if necessary), in agreement with the respective contact person at Source, in order to ensure a sound and efficient visit.

### **2.3.2 Determining the (physical) Scope of on-site Monitoring Visits**

#### Policy

The UEBT Member shall ensure that all Organizations at Source and Field Operators that are under the scope of certification are captured in the scope of the on-site monitoring activities.

All sites and locations belonging to the Organization at Source and Field Operators that are in any way involved in the sourcing process of the ingredient(s) subject to certification must also be included in the Monitoring visits.

Subcontracted companies or agencies that are appointed by the Organizations at Source or Field Operators and handle the certified Ingredient in any way must also comply with the UEBT requirements and should be included in the monitoring activities.

The UEBT Member shall ensure that all relevant verifiers of the UEBT Field Checklist (or equivalent<sup>16</sup>) are checked during these Monitoring visits.

In addition, all organizations in the Supply Chain manipulating the Ingredient(s), and whose operations may compromise the authenticity and traceability of the Ingredient, are subject to Traceability checks (see Addendum V “Outline of Traceability Requirements”).<sup>17</sup>

#### Procedure

The UEBT Coordinator at Member determines which Organizations at Source, Field Operators and related sites need to be monitored and provides clear instructions to the Internal Monitoring personnel to ensure that all relevant sites are included in the Monitoring visits. The UEBT Field checklist (or equivalent) is used by the Monitoring Personnel for capturing and reporting on the results of the Monitoring visits. Information on which sites were included in the visit is also captured in writing.

In addition, the UEBT Coordinator at Member determines the scope for the traceability verification at organizations manipulating the Ingredient(s), in order to safeguard the authenticity and traceability of the Ingredient throughout the Supply Chain. The UEBT Coordinator instructs the Monitoring Personnel to conduct traceability verification where necessary.

### **2.3.3 Frequency of on-site Monitoring visits**

#### Policy

The UEBT Member shall ensure that full on-site Monitoring visits of all Organizations at Source and Field Operators are carried out on an annual basis to ensure compliance with UEBT Ethical BioTrade Standard requirements.<sup>18</sup>

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<sup>16</sup> See Policy 2.1.2 Equivalency of Standards

<sup>17</sup> See Policy 2.2.6 Traceability Requirements

<sup>18</sup> A Local Monitoring System may be established to support the task of monitoring Field Operators. See Policy 2.2.4 Establishing Local Monitoring Systems.

## Procedure

The UEBT Coordinator at Member ensures that all Organizations at Source and respective Field Operators that supply Natural Ingredients under the UEBT Certification Program are monitored on an annual basis through on-site visits. An audit schedule is prepared accordingly. The on-site visits can be carried out either by the Monitoring Personnel or by external auditors. If applicable, the tasks of monitoring can be delegated to a Local Monitoring System (see Policy Establishing Local Monitoring Systems).

If a Field Operator represents a group comprised of several individuals (producers, collectors and/or workers), these must be visited on a spot check basis as part of the annual monitoring of the Field Operator. The rules and procedures for sampling for the spot checks are clearly defined in the UEBT Member's IMS procedures. These must ensure that the sample of individuals visited annually is representative of the group (the Field Operator) as a whole.

In the cases of sub-supplier structures where an LMS is in place, the UEBT Member must ensure that annual monitoring visits are conducted at the LMS and at a minimum of the **square root plus one** of the sub-suppliers that are comprised in the LMS.

### 2.3.4 Exceptions concerning the Scope and Frequency of on-site Monitoring Visits

#### Policy

In exceptional cases, where Organizations at Source or specific Field Operators have distinguished themselves through proactiveness, timely follow-up related to corrective actions as well as a high level of compliance over time, and which are overall rated as low risk on the basis of the Risk Assessment of said organization (see Policy regulating Risk Assessments), the UEBT Coordinator at Member may decide to reduce the **scope** of the on-site Monitoring visits. In this case the Monitoring visits may be narrowed down to focus on critical sites, locations, or certain Field Operators.

Similarly, the UEBT Coordinator at Member may decide, provided the above applies, to reduce the overall **frequency** of the Monitoring visits of certain Organizations at Source. I.e. it may be decided that for particular, low-risk cases it is sufficient to conduct on-site Monitoring visits only every second or every third year.

In all cases, the above can only be applied under following conditions:

- A full comprehensive monitoring visit must be conducted, at the latest, within the third year following the last full monitoring visit.
- Continuous contact must be maintained between the UEBT Member and the concerning organization for the period of reduced monitoring. This may be in the form of technical support visits, training events, request for up-date (self-assessment) reports, customer visits, or other. Records of such activities are kept.

#### Procedure

The UEBT Coordinator at Member assesses and decides case-by-case whether an exception to the frequency and scope of Monitoring visits can be applied. The decision must be based on results of respective Risk Assessments<sup>19</sup>, previous audit results and other relevant proof of

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<sup>19</sup> See Policy 2.2.5 Performing Risk Assessments of Supply Chains

distinguished performance of the concerned organizations. Respective documentation is kept and reassessed by the UEBT Coordinator at Member when necessary.

### 2.3.5 Onsite Monitoring Visit Activities

#### Policy

A standardized procedure for the Monitoring visits must be in place in order to ensure similar levels of rigour and comparable outcomes of the visits. The procedure should clearly define the activities to be performed at each visit.

The UEBT Coordinator at Member shall ensure that all on-site Monitoring visits are conducted according to the procedure.

#### Procedure

A procedure for conducting Monitoring visits must be established. These comprise the following minimum elements:

- Opening meeting to discuss the purpose, the scope and the program of the visit.
- Interviews with relevant people or groups, visits of relevant sites, and review of relevant documentation, in order to obtain sufficient, substantiated information for the purpose of the assessment.
- Closing meeting to discuss the findings, consequences, corrective measures and next steps.

All Monitoring Personnel conducting Monitoring visits is trained in the procedures.

The UEBT Coordinator at Member is responsible for ensuring that the procedures are followed for every monitoring visit conducted for the purpose of certification.

### 2.3.6 Onsite monitoring visit reports

#### Policy

Standardized requirements for reporting on Monitoring visits must be in place in order to ensure that the reports are sufficiently informative, comprehensible and that they allow for effective review and evaluation by a third party.

The UEBT Coordinator at Member shall ensure that all monitoring visit reports meet the established requirements.

#### Procedure

Reporting requirements for the Monitoring visits are established. These comprise the following minimum elements:

- Reporting is done using the UEBT Field checklist (or equivalent<sup>20</sup>).
- The reports provide sufficient information for a reader to understand the context and reasons for the scores and main findings. This is particularly important for cases of critical or problematic findings.

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<sup>20</sup> See Policy 2.1.2 Equivalency of Standards

- The reports contain definite scoring results. All non-conformities need to be mentioned in the report and the reasons for the non-conformity shall be clearly stated.
- The reports provide an overview of the different activities performed during the audit by completing the form “General Information about the Monitoring Visits”.
- Evidence to support the monitoring results must be requested whenever considered relevant/necessary and be submitted together with the report. The relevance of documented evidence must be determined on a case-by-case basis. As a general rule, any critical, ambiguous, doubtful or problematic finding should be supported by documented evidence.
- If non-conformities are found, the report states if and what corrective measures have been discussed and agreed upon with the monitored organization.
- The report is submitted to the UEBT Coordinator at Member no later than one month after completion of the visit.

All Monitoring Personnel conducting the Monitoring visits is trained in these requirements.

The UEBT Coordinator at Member reviews the reports to make sure that all reporting requirements have been met. If any information is incomplete, inconsistent or unclear, the UEBT Coordinator will request that the person having conducted the monitoring visit to submit additional information or to make the necessary corrections.

### 2.3.7 Taking Compliance Decisions

#### Policy

The UEBT Member shall ensure that compliance decisions are taken in a timely manner following the on-site Monitoring visits. Compliance decisions shall be taken by at least two people of the UEBT Member who are familiar with the requirements of the UEBT Certification.

#### Procedure

The UEBT Coordinator at Member makes the compliance decisions together with at least one other person<sup>21</sup>. Both parties need to agree on the compliance decision. In the event that a consensus cannot be reached, the judgment of the UEBT Coordinator at Member shall prevail for the decision.

In all cases, compliance decisions must be made in a consistent manner, following the UEBT scoring rules (or equivalent) and on the basis of complete and veritable information.

An Organization at Source can be given the status of “Compliant” for the purpose of the UEBT Certification if the Organization at Source reaches the minimum score established by the UEBT Scoring System<sup>22</sup> (or equivalent<sup>23</sup>). The score is set together of all UEBT verifiers (or equivalent)

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<sup>21</sup> For the purpose of the IMS, the second person may be the Monitor who has conducted the on-site visit. To enable the UEBT Coordinator at Member to conduct on-site Monitoring visits him/herself, a second person must be appointed by the UEBT Coordinator at Member prior to Monitoring visits being scheduled, to act as an adjunct coordinator in the preparation, follow-up and decision conformity decision making process. In this case it will be the adjunct coordinator who is responsible for the review of the on-site monitoring visit report (see Policy 2.3.6 Onsite Monitoring Visit Reports).

<sup>22</sup> See Addendum VIII “Description of the UEBT Scoring System”

<sup>23</sup> See Policy 2.1.2 Equivalency of Standards

that are applicable both to the Organization at Source (management system requirements) and the Field Operators (field level requirements).

Compliance decisions are made at the latest three months after completion of the monitoring visit. In exceptional cases the deadline for a decision can be extended to 6 months. Any exceptions regarding the deadline are justified and documented.

The decision-making process must be clearly documented in such way that it allows a third party to review and reproduce the process leading to the decision. In this context, special attention is given to critical decisions or those where consensus could not be reached.

The final decision on compliance of the Organization at Source must be communicated to the person(s) within the UEBT Member in charge of purchasing and all other relevant people and/or departments with clear indication of the implications related to the decision. In particular, decisions leading to a status of “Not Compliant” imply that the Organization at Source may not sell their ingredients to the UEBT Member as certified and must be clearly communicated as such to all relevant parties.

### 2.3.8 Requesting Corrective measures following on-site Monitoring visits

#### Policy

The UEBT Member may allow the Organization at Source to undertake corrective measures in order to achieve the status of “Compliant”, provided that the nature of the concerned non-conformity does not put the integrity or credibility of the system at risk or represent a major breach of trust. In these cases, substantiated evidence supported by documental proof or on-site follow-up visits must be in place in order to approve the corrective measures and confirm the “Compliant” status of the Organization at Source. All proof of corrective measures must be documented.

#### Procedure

The Monitor and/or the UEBT Coordinator at Member determines, for each of the non-conformities identified, and in agreement with the Organization at Source, which corrective measures must be put in place for the Organization to reach the status of “Compliant”.

The UEBT Coordinator requires the Organization at Source to implement the corrective measures within a specified time frame. The time frames must be set as short as possible and should in general not exceed the period of 3 months after the monitoring visit. In exceptional cases the deadline may be extended to up to 6 months. Any exceptions must be justified and documented. *In no case may the Organization at Source be given the status of “Compliant” nor may the Ingredients of the respective organization be sold as certified before the corrective measure(s) have been implemented and confirmed as sufficiently fulfilled.*

A compliance decision is made once the corrective measures have been implemented and proof of compliance is in place. The UEBT Coordinator at Member decides whether documental proof is sufficient or a follow-up on-site visit is required to confirm the measures, and informs the Organization at Source accordingly.

In order to grant the “Compliance” status to the Organization at Source, the UEBT Coordinator must confirm that the requested measures have been adequately implemented within the specified time frame. The UEBT Coordinator must also confirm that the corrective measures are sufficient to raise the overall score of the organization to a level of compliance according to the UEBT Scoring System rules (or equivalent).



Once the “Compliance” status has been confirmed, the Organization at Source may be approved for sales of their ingredients with a certified status. The UEBT Coordinator must ensure that the person(s) in charge of purchasing within the UEBT Member and any other relevant person / department is informed in due time about the “Compliant” status of the Organization at Source following the corrective measures review.

Proof of corrective evidence and resulting compliance decisions must be documented.

### **2.3.9 Unannounced Onsite monitoring visits**

#### Policy

The UEBT Member must have the right to conduct unannounced monitoring visits at selected Organizations at Source if considered necessary based on risk assessments, suspicion, or any indication that may be considered a risk to the integrity of the UEBT Certification system. The Organizations at Source participating in the Certification Program shall agree to this rule in an agreement to be signed with the UEBT Member.

#### Procedure

The UEBT Coordinator at Member ensures that Organizations at Source participating in the UEBT Certification Program agree to this rule in writing.

The UEBT Coordinator determines if and which Organization(s) at Source require(s) unannounced monitoring visits. The selected organization shall not be informed about the visit until at most 72 hours before the visit date.

### **2.3.10 Monitoring & Evaluation Data Collection**

#### Policy

The UEBT Member shall collect Monitoring and Evaluation (M&E) data to monitor the Ethical BioTrade practices and assess the impact of respective activities at source from which the Ingredient(s) originate.

#### Procedure

The UEBT Coordinator at Member must ensure that sufficient and adequate M&E data is being collected, either directly by the Monitoring Personnel or by requesting the Organizations at Source or other (supporting) organizations to collect and submit the data. UEBT provides guidance on the type of data to be collected.

Monitoring personnel are instructed to assess and confirm the adequacy and accuracy of the data collected when conducting the on-site Monitoring visits.

### **2.3.11 Mechanisms for resolving disputes arising from Monitoring Activities**

#### Policy

The UEBT Member shall have established procedures for resolving disputes concerning the UEBT Certification Program. The UEBT Member shall make every attempt to settle disputes with other organizations subject to this Monitoring system in an amicable manner and to the mutual satisfaction of all parties involved.



## Procedure

In the event of any disputes arising from monitoring activities by the UEBT Member or its suppliers, the UEBT Member must follow the established procedures for resolving such disputes. The UEBT Coordinator at Member must document the disputes and record all relevant information related to the nature of the dispute, the people involved and when it occurred. Any attempts to settle the dispute must also be documented by providing a summarized record of the proceedings of respective meetings.

The UEBT Coordinator at Member must make the information concerning disputes available to UEBT and the auditor prior to the external audits at the UEBT Member.

## **2.4 Policies regulating the Roles and Responsibilities of IMS Personnel**

### **2.4.1 Roles and responsibilities of the UEBT Coordinator at Member**

#### Policy

The UEBT Member shall formally appoint a qualified person as UEBT Coordinator at Member, who is in charge of the UEBT Certification Program. This person shall be in charge of all administrative and management aspects related to UEBT Certification in general and the IMS in particular. The UEBT Coordinator at Member shall be appointed by and report directly to Senior Management.

*Note: The UEBT Coordinator at Member may be the same person as the existing contact person for UEBT membership issues. As made explicit by means of this Policy, the role and function of the UEBT Coordinator at Member at organization are more formal and contractually binding.*

#### Procedure

The UEBT Member notifies UEBT of the staff person, which has been appointed as the UEBT Coordinator at Member. The UEBT Member confirms the roles and responsibilities of the appointed person and confirms that the appointed person complies with the Profile of the UEBT Coordinator at Member (see Addendum II “Profile of the UEBT Coordinator at Member”).

The UEBT Coordinator at Member is trained for the purpose of the UEBT Certification Program.

### **2.4.2 Roles and responsibilities of Monitoring Personnel of the UEBT Member**

#### Policy

The UEBT Member shall appoint adequate and qualified Monitoring Personnel to ensure the credible and effective operation of the IMS.

#### Procedure

The UEBT Coordinator at Member selects suitable personnel according to the qualifications, roles and responsibilities as set out in Addendum III “Profile of the Monitoring Personnel” and appoints them as (IMS) Monitors to guarantee ongoing and regular monitoring activities of the Organizations at Source. Internal Monitors report and are accountable to the UEBT Coordinator at Member.

Monitoring Personnel are trained for the purpose of the UEBT Certification Program.



### **2.4.3 Roles and responsibilities of the Local Manager at Source**

#### Policy

The UEBT Member shall ensure that the Organizations at Source appoint a Local Manager in charge of the administration at source level related to UEBT Certification. The Local Manager shall be appointed by, and report directly to, Senior Management of the Organization at Source, and shall act as the primary contact person of the Organization at Source for all issues related to the UEBT Certification.

#### Procedure

Together with the senior management of the Organization at Source, the UEBT Coordinator at Member considers a qualified and reliable staff person at source level to act as the Local Manager at Source. Senior management confirms the roles and responsibilities of the Local Manager as set out in Addendum IV “Profile of Local Managers and Coordinators at Source” and provides evidence that the appointed person has the respective qualifications.

Local Managers are trained for the purpose of the UEBT Certification Program.

### **2.4.4 Roles and Responsibilities of the Local Coordinator at Source**

#### Policy

In cases where there is a need for a Local Monitoring System, the UEBT Member must appoint a Local Coordinator at Source in charge of the Local Monitoring System. The Local Coordinator shall be appointed by and report directly to Senior Management of the Field Operator, and will be in charge of the coordination and communication related to the IMS.

#### Procedure

Together with the senior management of the source organization, the UEBT Coordinator at Member considers a qualified and reliable staff person at source level to act as the Local Coordinator. Senior management confirms the roles and responsibilities of the local Coordinator as set out in Addendum IV “Profile of Local Managers and Local Coordinators at Source” and provides evidence that the appointed person has the respective qualifications.

Local Coordinators at Source are trained for the purpose of the UEBT Certification Program.

### **2.4.5 Conflict of Interest of Personnel**

#### Policy

The UEBT Member shall request that all personnel declare any conflict of interest in organizations within the Supply Chain.

#### Procedure

All personnel (employed staff and external consultants) involved in the UEBT Certification Program and the IMS pro-actively sign a statement declaring any situation known to them that may present them with a conflict of interest with regard to any organization or person participating in this Program.

## 3. External Control System

### 3.1 General ECS Specifications

The External Control System (ECS) refers to a third party certification system to verify the transparency, reliability and integrity of the IMS and its elements. Its main purpose is to confirm that the IMS is functioning well and that all Supply Chains have been accurately assessed against the requirements of the UEBT Standard.

Ultimately, the ECS provides an added assurance that Natural Ingredients originating from Supply Chains have been sourced according to UEBT Ethical BioTrade Standard.

UEBT Members seeking certification for Supply Chains must contract the services of an approved Certification Body<sup>24</sup> to conduct external Audits at their own organization, as well as at relevant Organizations at Source and Field Operators.

The UEBT Member shall also allow external audits to be conducted at all service organizations that manipulate the ingredient subject to the UEBT Certification for the purpose of confirming the traceability requirements.

The ECS is operated by recognized Certification Bodies and experienced auditors that are specifically trained and qualified by UEBT to conduct such verification and audit activities.

#### 3.1.1 Scope

The scope of the ECS is determined by the scope of the IMS. External control audits take place at the UEBT Member level for the purpose of assessing the quality and management of the IMS. The external control also consists of spot-checks of the Supply Chains for the purpose of 1) assessing the functioning of the IMS in these supply chains, both at the levels of the Organizations at Source and Field Operators, 2) confirming that these reach sufficient levels of compliance for certification, and 3) confirming compliance with the UEBT Traceability requirements throughout the supply chains.

#### 3.1.2 Regulatory Framework for the ECS

The requirements outlined in this UEBT Certification Program, together with the Ethical BioTrade Standard form the basis for the ECS. To conduct UEBT certification audits, external auditors apply the **UEBT Certification Checklist**, which comprises the requirements of this Certification Program, and the **UEBT Field Checklist** (or equivalent<sup>25</sup>), which comprises the requirements of the Ethical BioTrade Standard.

In order to determine compliance with the requirements of this protocol, the UEBT Certification Checklist contains a scoring system that forms the basis for the decision-making process.

#### 3.1.3 Resources

The UEBT Member agrees to make adequate resources available to allow for annual audits of their IMS and for the required number of spot checks to be conducted annually at selected Supply Chains. The particular scope of the ECS depends on the level of conformity determined by the IMS and its degree of accuracy, which is established by the ECS over time.

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<sup>24</sup> See 3.2 Conditions for Approval of CBs for the UEBT Certification Program

<sup>25</sup> See Policy 2.1.2 Equivalency of Standards

## 3.2 Conditions for Approval of CBs for the UEBT Certification Program

The approval of a CB for the UEBT Certification System is based on different requirements with regard to the CB itself, the person(s) responsible for the UEBT Certification process (CB Certification Coordinator) and the auditors conducting the UEBT audits.

### 3.2.1 Accreditation

CBs must hold valid a ISO/IEC 17065 accreditation issued by an accreditation body that is signatory to a Multilateral Agreement (MLA), i.e. the accreditation body is

- Member of the International Accreditation Forum (IAF) or
- Full member of ISEAL Alliance.

The accreditation must cover:

- Good Agricultural Practices ((e.g. GLOBALGAP) and/or organic agriculture (e.g. IFOAM, JAS, NOP, EU) and/or other sustainability schemes (e.g. UTZ, FSC, Rainforest Alliance)
- Chain of Custody (e.g. GFSI, FSC, ISO9001/22000, IFOAM) and Management System certifications

### 3.2.2 CB Personnel

The CB must have qualified personnel to carry out the activities linked to the UEBT Certification process. The CB must appoint a CB Certification Coordinator, who will be the overall responsible for the UEBT Certification Program with the CB, and qualified Auditors who will conduct UEBT Audits. The CB Certification Coordinator and Auditors must comply with the qualification requirements outlined in Addendum IX “Qualification Requirements for CB Personnel”.

A CB may also subcontract auditors to conduct UEBT audits on their behalf, on condition that the appointed auditors have successfully completed the UEBT Training process<sup>26</sup>. In this case, the CB remains responsible for the certification process, and for responding to any query related to the certification that may arise.

### 3.2.3 Scope of the CB Approval

The scope of the approval of a Certification Body is determined by its operational structure. All local offices that are under the umbrella of the same Certification Body and are operated centrally may be covered under the same approval upon a formal request to UEBT.

## 3.3 General Requirements for approved CBs

### 3.3.1 Impartiality

The CBs shall adequately safeguard the impartiality of their activities. They must ensure that their Personnel do not carry out any activity that may affect their impartiality, such as carrying out consultancy activities or pre-audits for clients on whom they also perform UEBT audits. They

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<sup>26</sup> See Addendum X: “UEBT Training Program”

must also ensure that the Personnel has not worked for the organization (i.e. UEBT Member or Organization at Source) at which they are to carry out auditing or certification activities in the past 2 years preceding the task.

### 3.3.2 Integrity

THE CB Certification Coordinators and Auditors are expected to fulfill their tasks with the highest ethical standard.

In order to maintain professional integrity, CBs must avoid that one auditor conducts more than three subsequent audits of the same organization in a row. A system for rotation of auditors should be in place. This applies both for audits at the UEBT Member and at field level.

### 3.3.3 Confidentiality

All information and records of the audit and certification process must be treated as confidential. Information can only be shared with third parties other than UEBT with written consent of the UEBT Member.

### 3.3.4 CB Personnel Training and Performance

Before conducting auditing and certification activities for UEBT, all CB Personnel involved in the UEBT Certification Program must have successfully completed the UEBT Training Program applicable to them, as outlined in Addendum X "UEBT Training Program".

UEBT Personnel must fulfill their respective tasks related to the UEBT Certification process according to their roles and responsibilities described in Addendum XI "Roles and Responsibilities of CB Personnel".

## 3.4 Policies regulating the Collaboration between UEBT and CB's

### 3.4.1 Formal Approval Process of CB's for the UEBT Certification Program

#### Policy

A CB wishing to conduct audits for the UEBT Certification Program must be formally approved by UEBT. The Approval process consists of two parts: The formal approval of the CB, and the approval of the CB Personnel appointed to carry out audits and certification activities for the UEBT Certification.

The CB may only offer auditing services to UEBT Members for UEBT Certification once both steps of the Approval Process have been completed.

#### Procedure

##### *Formal Approval of the CB for the UEBT Certification Program*

In order to initiate the approval process, the CB must submit to UEBT a completed application form (UEBT Application Form for CBs<sup>27</sup>), including information related to the CB itself (e.g. accreditation) and of the CB Personnel (Auditors and Certification Coordinator) to be appointed to the UEBT Certification Program. The application form can be found in the Certification section of the UEBT Website.

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<sup>27</sup> The application form can be requested at [certification@uebt.org](mailto:certification@uebt.org)



UEBT reviews the application and requests further information if necessary. Upon acceptance of the application, UEBT submits a Letter of Agreement to the CB, which outlines the conditions for the cooperation between UEBT and the CB. The Letter of Agreement must be signed by both parties.

#### *Approval of CB Personnel*

Once the Letter of Agreement has been signed, the appointed CB Personnel must complete the UEBT Training Program, which includes the completion of the applicable training modules and accompanied audits (see Addendum X “UEBT Training Program”). Upon successful completion of the training the CB Personnel receives a Certificate of Approved UEBT Auditor and may carry out auditing and certification activities in the scope of the UEBT Certification Program.

### **3.4.2 UEBT Oversight**

#### Policy

UEBT monitors the work of the CB related to the UEBT Certification Program in two ways:

#### A) Desktop review of UEBT audit reports

Every audit report of certification audits conducted at UEBT Members is reviewed by UEBT before its submission to the UEBT Member, for the purpose of assessing and monitoring the quality and consistency of the report.

#### B) Accompanying the external Audit process

UEBT shall accompany the UEBT Audit process with the objective of:

- Ensuring that relevant information and guidance are provided to Auditors prior to the audits
- (Re-) evaluating the performance of CB Personnel related to the UEBT Certification process and/or
- Overseeing the UEBT Certification Process of the UEBT Member and/or
- Other relevant reason identified by UEBT.

In all cases, report review feedback, evaluation reports and other relevant information are prepared by UEBT and shared with the CB.

#### Procedure

#### A) Desktop Review of UEBT Audit reports

After every UEBT audit at UEBT Member, the CB Certification Coordinator or Auditor submits the completed version of the UEBT Certification Checklist to UEBT prior to submitting it to the UEBT Member. The document shall be submitted at the latest two weeks before the final submission date to the UEBT Member is due. UEBT conducts a quality and consistency check of the report and provides written feedback to the CB within one week from the date of reception of the report.

#### B) Accompanying the external Audit process

The CB Certification Coordinator informs UEBT about all audits scheduled for the upcoming year.

UEBT provides, prior to the audit, relevant information and guidance to the CB Certification Coordinator and/or Auditor concerning the respective organization(s) to be audited.

UEBT also establishes, when necessary, which audits shall be accompanied by UEBT staff and informs the CB Certification Coordinator accordingly, clearly indicating the objective(s) of the accompanied audit. The CB Certification Coordinator is responsible for informing the assigned auditor about the request and for ensuring that the accompanied audit takes place. A feedback report is prepared by UEBT after the accompanied audit on the basis of the established objective(s) and scope.

### 3.4.3 Sanctions Policy

#### Policy

UEBT may issue warnings and reserves the right to suspend a CB from conducting UEBT Certification activities, on the basis of evidence of breach of contract, inadequate performance of CB Personnel or incompliance with the requirements outlined in this document. A suspension may be applied after three written warnings have been given for a specific and same case.

In severe situations, such as cases that lead to a breach of trust or compromise the integrity of the UEBT Certification System, a suspension may be applied without prior warning.

In all cases a suspension of a CB means that the CB may not do further certification work for the UEBT Certification Program.

The CB may request to be reconsidered for the UEBT Certification Program. The decision on whether the request can be granted and the required actions are determined on a case by case basis by UEBT.

The CB can appeal the decision to UEBT.

#### Procedure

In the case of evidence of breach of contract, inadequate performance or incompliance with the requirements outlined in this document, UEBT issues written warning letters to the CB, indicating the required actions to be undertaken to resolve the problem.

If no or insufficient action is taken after the third warning, UEBT may take a formal decision to suspend the CB from the UEBT Certification Program. In this case a written suspension letter is submitted to the CB, stating the reason for suspension and the consequences of such decision. UEBT actively informs all involved stakeholders about the suspension.

The CB may submit a formal appeal to UEBT<sup>28</sup> within one month from the date of reception of the suspension letter, in which case the UEBT Appeals Procedure will be followed.

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<sup>28</sup> Appeals should be submitted to [appeals@uebt.org](mailto:appeals@uebt.org)



### 3.4.4 Selection of an External Certification Body by the UEBT Member

#### Policy

The UEBT Member shall select a Certification Body that has been approved by UEBT for the purpose of the UEBT Certification Program. The UEBT Member shall ensure that both the CB and the appointed CB Personnel are approved and have valid approval certificates for carrying out the respective activities for the UEBT Certification Program.

#### Procedure

The UEBT Coordinator at Member must contact an approved CB as listed on the UEBT website for the purpose of conducting their annual UEBT certification audits. If the UEBT Member wishes to contract a CB that is not listed on the UEBT website, the CB must formally apply for approval and successfully complete the full Approval Process before they can carry out activities for UEBT Certification.

A service agreement must be signed between the UEBT Member and the selected CB.

## 3.5 Policies regulating the External Audit Process

The UEBT Certification Program distinguishes between 6 types of external Control Audits:

1. Full System Audits at UEBT Member
2. Audits at Organizations at Source (Spot Checks) including Field Operators
3. Audits at Local Monitoring Systems (LMS)
4. Shadow Audits
5. Follow-up Audits
6. Unannounced Audits

### 3.5.1 Full System Audit at UEBT Member

#### Policy

Full System Audits at UEBT Member shall be conducted annually. Focus of these audits is the assessment of the UEBT Member's IMS and its implementation in all Supply Chains for which UEBT Certification has been requested.

In the Full System Audit, the assigned Auditor shall verify that the IMS meets all UEBT Certification requirements both formally (policies, procedures etc.) and in practice (adherence to the policies, procedures, etc.), and that it can safeguard that the Supply Chains comply with the UEBT Standard requirements.

The Auditor shall further assess that the Ingredient(s) remain traceable from the source all the way to the UEBT Member by meeting the UEBT Traceability requirements<sup>29</sup>.

The results of the Full System Audits are the basis for the UEBT Certification decisions. The spot checks at Organizations at Source<sup>30</sup> have the purpose of complementing the information collected during the Full System Audits. Findings resulting from these Spot Checks shall be captured in the results of the Full System Audit.

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<sup>29</sup> See Addendum V "Outline of Traceability Requirements"

<sup>30</sup> See Policy 3.5.2 Audits at Organizations at Source (Spot Checks) including Field Operators



## Procedure

### A) Planning the Full System Audit

It is the responsibility of the UEBT Coordinator at Member to ensure that the annual System Audit takes place at the latest **three months** before the UEBT certificate expires. He/she shall contact an approved CB and request an audit to be conducted by a qualified Auditor that has been approved for conducting IMS Audits for UEBT<sup>31</sup>. UEBT shall be informed about the scheduled audit.

The CB Certification Coordinator shall appoint an Auditor who has been approved for UEBT Audits and who is qualified for conducting IMS Audits to carry out the Full System Audit, and provide him/her with all relevant information in order to allow for an effective audit planning and preparation.

It is the responsibility of the CB Certification Coordinator to inform UEBT about the upcoming audit and to check whether any additional information or guidance regarding the audit process that may be relevant for the concerning audit is available.

In minimum the Auditor shall receive:

- Background information about the UEBT Member (location, scope of the business, contact person) and complete and up-to-date lists of Supply Chains under the certification;
- Application form (if initial audit), previous audit report(s) (if subsequent audit);
- Information on previous certification status, suspensions (if applicable) etc.

The Auditor shall follow the CB's own procedure for audit planning, and shall submit the audit plan to the UEBT Member as well as to UEBT.

### B) Carrying out the Full System Audit

The assigned Auditor shall carry out the Full System Audit using the UEBT Certification Checklist. The audit shall consist of following main parts:

1. System Check (IMS): To verify if the policies, procedures etc. comply with the UEBT IMS requirements outlined in this protocol.
2. Implementation Check: To assess whether the IMS policies and procedures are adopted and implemented accordingly. Results of Spot Checks conducted at Supply Chains shall be taken into account for this check and reflected accordingly in the report.
3. Document check: To evaluate on the basis of IMS monitoring visit reports and external audit reports and respective support documentation whether the quality and the focus of the monitoring activities sufficiently meet the UEBT IMS requirements.

For the document check, the Auditor shall make a selection of at least the **square root plus one** of the Monitoring Visit reports conducted by the UEBT Member for the UEBT

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<sup>31</sup> The list of approved CB's can be found on the UEBT website. Auditors shall be able to demonstrate (with a valid UEBT qualification certificate) that they have been approved for conducting the specific type of audit.



certification. The selection shall be based on a combination of at **least two** of the following sampling methods:

- a. Random sampling: Selection not based on any predetermined considerations
- b. Stratified sampling: Categorize the Supply Chains in subgroups and make a selection from each of the subgroups.
- c. Judgmental sampling: Based on the Auditor's own judgment
- d. Discovery sampling: Based on specific evidence or assumption that require further investigation.

The approaches taken for the sampling must be described in the audit report.

In case that new Supply Chains have been included in the course of the year preceding this audit, respective monitoring visits reports must be included in the sampling.

4. Traceability check: To assess compliance with the UEBT Traceability requirements.
5. Management System check: To confirm implementation of those UEBT Standard requirements for which the UEBT Member has taken responsibility on behalf of Field Operators or Organizations at Source<sup>32</sup>.

#### C) Reporting on the Full System Audits

The assigned Auditor shall complete the UEBT Certification Checklist with the most important audit information and findings. Results of the spot checks carried out within this audit cycle shall be captured in the same report checklist. The UEBT Scoring System shall be applied for the assessment.

At the end of the audit, both the UEBT Member and the Auditor shall sign a printed version of the Checklist with the audit findings. With this, both parties confirm that they fully understand and agree with the findings of the audit, and acknowledge that the findings may be subject to changes on the basis of outcomes of quality and consistency checks carried out by the CB and UEBT.

The completed checklist shall be submitted to UEBT for quality and consistency check before the final report is submitted to the UEBT Member.

#### D) Following up on the Full System Audit results

In the event that non-conformities with critical control points apply, the UEBT Coordinator at Member and the Auditor and/or CB Certification Coordinator jointly agree on the corrective measures that need to be implemented as conditions for the UEBT Certification. The corrective measures and deadlines for completion are clearly described in the report. In any case the corrective measures must be implemented before the certificate expires.

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<sup>32</sup> See Policy 2.2.7 Delegation of responsibilities from the Organization at Source to the UEBT Member.

### 3.5.2 Audits at Organizations at Source (Spot Checks) including Field Operators

#### Policy

The CB must ensure that a selection of Supply Chains included in the UEBT Certification is externally audited every year with the aim of complementing the Full System Audit. The purpose of these Spot Checks is to assess the functioning and implementation of the IMS at field level on the one hand, and to confirm Standard compliance by the Organizations at Source and Field Operators on the other hand.

#### Procedure

##### A) Selecting the Supply Chains to be audited (Spots Checks)

The CB Certification Coordinator must select, during the annual Full System audit, the Supply Chains that shall be audited for the purpose of complementing the assessment of the IMS.. A minimum of the **square root plus one** of all Supply Chains that are part of the UEBT Certification Program must be selected for the spot checks annually. The selection must be based on information collected at the last Full System Audit regarding the Supply Chains, in particular from their respective Monitoring Visit reports and from the risk assessments. The CB Certification Coordinator may apply the CB's own sampling methodology provided that the approach comprises **at least two** of the sampling methods as describe in the Policy "Full System Audit at Member" (random sampling, stratified sampling, judgmental sampling, discovery sampling). The sampling methodology must be described in the Full System audit report.

The CB Coordinator must further ensure that following is considered when making the selection:

1. Organizations at Source that have been identified as very high risk (during the last Full System Audit) must be selected for an external audit.<sup>33</sup>
2. Requests of UEBT to include selected Organizations at Source in the selection, based on justified reasons.
3. In the first two years of certification, auditors should conduct at least one shadow audit to assess the performance of the internal Monitors (see Policy "Shadow Audits").

##### B) Planning the Spot Checks

The CB Certification Coordinator and UEBT Coordinator at Member shall jointly determine the best time for conducting the Spot Checks. Ideally (but not necessarily) the Spot Checks should be conducted during the harvest period of the concerned Ingredient.

The UEBT Coordinator at Member shall appoint Auditors who have the necessary qualifications for conducting the respective Field Audits, and provide them with all relevant information in order to allow for an effective audit planning and preparation.

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<sup>33</sup> This is the case, for example, when the Organization at Source is not compliant with an Entry Indicator of the UEBT Standard or has serious, unresolved and/or recurring non-compliance with any of the other critical UEBT verifiers. It is also the case when the monitoring reports indicate a level of non-compliance of more than 20% of the full list of applicable verifiers. High-risk cases can also be identified on the basis of the UEBT Member's risk assessment. Structural risks (such as structures with a large number of sub-suppliers and a complex Local Monitoring System) should also be taken into account for the selection.

In minimum the Auditors shall receive:

- Background information about the Organization at Source (location, description of the organization, scope of the operations, contact person, description of the sourcing area).
- Previous audit report(s) or monitoring visit reports

The Auditor shall follow the CB's own procedure for audit planning.

### C) Carrying out the Spot Checks

The assigned Auditor shall carry out the Spot Checks using the UEBT Field Checklist (or equivalent<sup>34</sup>). The Spot Checks shall consist of following main parts:

1. Local Management System Checks: Verification at the level of the Organization at Source regarding compliance with the UEBT Standard requirements applicable to them (management system requirements)
2. Field Level Checks: Verification at the level of Field Operators regarding compliance with the UEBT Standard requirements applicable to them (field level requirements).
3. Field checks shall be conducted at a sample of Field Operators supplying to the Organization at Source. The Auditor shall make the selection of the Field Operators based on the CB's own sampling procedures. However the Auditor shall ensure that the selection covers a representative sample of the Field Operators in terms of size, type of cultivation, sourcing area, and risk of any kind. In minimum the square root plus one of all Field Operators must be visited as part of the audit. If these Field Operators are organized in units (villages, farms, picking crews, etc.) then the auditor must select the Field Operators to be spot checked in such way that these are representative of at least 50% of the units.
4. Local Monitoring System Checks (if applicable): Verification at the level of the Organization at Source (or external structure) regarding compliance with the Local Monitoring System requirements outlined in this protocol<sup>35</sup>.
5. Traceability check: To assess compliance with the UEBT Traceability requirements at level of the Organizations at Source and Field Operators.

### D) Reporting on the Spot Checks

The assigned Auditor shall complete the UEBT Field Checklist (or equivalent) with the most important audit information and findings. The UEBT Scoring System shall be applied for the assessment.

At the end of the audit, both the UEBT Member and the Local Manager at Source shall sign a printed version of the Checklist with the audit findings. With this, both parties confirm that they fully understand and agree with the findings of the audit.

The audit results shall be shared with UEBT Member and the CB Certification Coordinator.

### D) Following up on the Full System Audit results

In the event that non-conformities are identified at the spot checks, the UEBT Coordinator at Member shall ensure that respective IMS Procedures are followed<sup>36</sup>.

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<sup>34</sup> See Policy 2.1.2 Equivalency of Standards

<sup>35</sup> See Policy 2.2.4 Establishing Local Monitoring Systems

Depending on the nature of the audit findings, it may be necessary for the UEBT Coordinator at Member to review their internal IMS procedures in order to better safeguard Standard compliance in future. This is the case, in particular, if the results of the spot check vary considerably from the results of previous (internal) Monitoring Visits.

The CB Certification Coordinator must ensure the main findings of the spot checks will be reflected in the final results of the Full System audit at Member.

## Exceptions concerning the Sample Size for annual Spot Checks

### Policy

In exceptional cases, the CB may decide to reduce the sample size for the spot checks to be conducted annually. This exception may apply when:

1. The UEBT Member has proven to have a fully functioning IMS in place that is compliant with UEBT's IMS requirements outlined in this Protocol;
2. The UEBT Member has substantiated proof that those Supply Chains that have been classified as low risk and hence for which the UEBT Member applies exception of reduced frequency of monitoring visits<sup>37</sup> are in fact low risk.

In these cases, the CB may decide to exclude those Supply Chains that are exempt from being monitored in that contemplated year from the list of supply chains from which to select the spot checks.

### Procedure

The CB Certification Coordinator assesses, on the basis of information from previous Full System Audit reports, audit or monitoring visit results of the concerned Supply Chain, risk assessments and other relevant information, whether a Supply Chain that has been classified as low-risk can be exempt from being spot-checked in that particular year in which no (IMS) monitoring visit is foreseen. The information must provide sufficient and substantiated proof that the risk of non-compliance with UEBT Certification and Standard requirements in the Supply Chain is in fact low. In that case, the CB Certification Coordinator may decide to exclude these from the list of all Supply Chains from which the sample for the annual Spot Checks will be taken. This approach must be reflected and justified in the Full System Audit report of the UEBT Member.

## 3.5.3 Shadow Audits

### Policy

To assure the quality of the IMS auditing process, it is recommended that the CB conducts shadow audits of Internal Monitoring Personnel. This means that an Auditor accompanies Internal Monitors at Monitoring Visits, in order to assess their performance regarding the monitoring activities. Shadow Audits may replace a Spot Check scheduled by the CB for the year.

In the first two years of certification, auditors should conduct at least one shadow audit.

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<sup>36</sup> E.g. IMS procedures for establishing corrective measures, suspending the Organization at Source for non-compliance, or other.

<sup>37</sup> See policy "Exceptions concerning the Scope and Frequency of on-site Monitoring Visits"



The UEBT Member shall agree to this rule in the agreement to be signed with the CB. Costs related to Shadow Audit shall be at the expense of the UEBT Member.

#### Procedure

The CB Certification Coordinator in coordination with the UEBT Coordinator at Member determines which shadow audits shall be conducted in order to assess performance of an Internal Monitor. During the Shadow Audit, the Auditor observes the Internal Monitor conducting the monitoring activities and prepares a written evaluation of the Internal Monitor. Results of the shadow audits shall be reflected in the results of the respective UEBT Certification Audit. Any finding that may affect the certification status of the UEBT Member shall be communicated to UEBT immediately.

### **3.5.4 Follow-Up Audits**

#### Policy

The CB may conduct follow-up audits following regular certification audits at the UEBT Member or field audits at selected Organizations at Source, in case that any applicable corrective measure(s) resulting from the audit - and which are crucial for the certification - require(s) onsite verification in order to confirm compliance, i.e. if due to the nature of the measure a document check is not sufficient. The UEBT Member shall agree to this rule in the agreement to be signed with the CB. Costs related to follow-up audits shall be at the expense of the UEBT Member.

#### Procedure

The CB Certification Coordinator in coordination with the auditor determines whether a follow-up audit is necessary to confirm compliance with the applicable corrective measure(s). Reasons for the follow-up audit are justifiable, clearly established and documented. In the event that a follow-up audit is necessary, the CB Certification Coordinator informs the UEBT Member and Organization at Source (if applicable) about the follow-up audit and establishes the date for the audit. The follow-up audits must not be full audits, but rather be limited to verification of compliance of the concerned corrective measures. Results of the follow-up audits shall be shared with the UEBT Member. Any finding that may affect the certification status of the UEBT Member shall be communicated to UEBT immediately.

The costs related to the follow-up audits shall be covered by the UEBT Member.

### **3.5.5 Unannounced Audits**

#### Policy

The CB may conduct unannounced audits at the UEBT Member or at selected Organizations at Source if considered necessary based on risk assessments, suspicion, any indication that may be considered a risk to the integrity of the UEBT Certification system, or at request of UEBT. The UEBT Member shall agree to this rule in the agreement to be signed with the CB. Costs related to unannounced audits shall be at the expense of the UEBT Member.

#### Procedure

The CB Certification Coordinator determines the organization that requires an unannounced UEBT Audit. Reasons for the unannounced audit are justifiable, clearly established and documented. The selected organization shall not be informed about the audit until at most 72

hours before the audit date. However, if the unannounced audit is to be conducted at a specific Organization at Source, the UEBT Member shall be informed about it prior to the audit, and a joint coordination of the audit may be performed. The unannounced audits shall be full UEBT Certification audits and shall be conducted using the UEBT Certification Checklist or Field Checklist (or equivalent<sup>38</sup>), whichever applicable.

The results of the unannounced audits shall be submitted to UEBT at the moment of submission of the subsequent UEBT Certification audit report. Any finding that may affect the certification status of the UEBT Member shall be communicated to UEBT immediately.

## 3.6 Policies Regulating the Certification Process

### 3.6.1 Certification Recommendations

#### Policy

CBs carrying out UEBT Certification Audits shall put forward to UEBT recommendations for the certification of the concerned UEBT Member, based on respective audit findings and results of corrective measures reviews (if applicable).

The UEBT Certification Committee takes the final certification decisions on the basis of the recommendations that are put forward by the CB.

#### Procedure

The CB Certification Coordinator submits to UEBT a written recommendation for certification of the UEBT Member, together with the final audit report (UEBT Certification Checklist) and all supporting documentation and information substantiating relevant findings. The process leading to the recommendation must be reviewed and approved by at least to people, one of which must be the CB Certification Coordinator (Four-Eye-Principle).

The moment for submission of the recommendation may be:

- Upon successful completion of the annual audit process of the UEBT Member, once it is confirmed that the UEBT Member has achieved the minimum score required for certification;
- Upon confirmation that the UEBT Member has successfully put in place all pending corrective measures

The CB Certification Coordinator must also put forward to UEBT recommendations for suspension of the certificate of a UEBT Member in case that there is proven evidence of serious non-conformity, breach of contract, breach of trust or other situation that requires immediate suspension of the certificate. In this case the recommendation must be submitted as soon as the above is confirmed.

UEBT Certification Committee assesses the audit process and the recommendation on the basis of the documentation submitted by the CB. A certification decision is taken by UEBT within 2 weeks after submission of the recommendation by the CB. UEBT submits the certification letter, the UEBT Certificate (if applicable), and all other relevant information to the UEBT Member. The CB Certification Coordinator is informed about the decision.

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<sup>38</sup> See Policy 2.1.2 Equivalency of Standards

### 3.6.2 Stepwise Approach to Certification

#### Policy

To facilitate the entry into the UEBT Certification Program, UEBT offers the possibility to apply for a stepwise approach to certification. The following conditions apply to the UEBT Member:

1. Compliant and certified IMS: The formal components (policies, procedures etc.) of the UEBT Member's IMS are fully established and compliant with the UEBT Certification requirements for the IMS. This is confirmed by the CB following the external Full System Audit.
2. Compliance with the critical UEBT Field Verifiers: The Supply Chains comply with the critical UEBT Field Verifiers<sup>39</sup>.
3. Work plan: A work plan is in place with clear milestones and respective activities for the roll-out of the IMS in all Supply Chains within a maximum period of 2 years.
4. Formal Commitment: The UEBT Member formally commits to fulfilling the work plan within the established timeframe.

#### Procedure

The UEBT Coordinator at Member submits a formal request for a stepwise approach for the UEBT Certification.

Following the request, the UEBT makes an assessment of the case regarding the conditions outlined above. The Certification Committee then takes a decision on the basis the assessment results. If the request is accepted, UEBT informs the UEBT Member and initiates the process to determine the actions to be taken and respective timeframes.

UEBT shall closely accompany the process for the stepwise approach and may request ongoing information from the UEBT Coordinator at Member about its progress. UEBT also reserves the right to accompany the IMS Personnel at Monitoring Visits with the aim of assessing the functioning of the IMS, the progress regarding the implementation of the work plan and the performance of the Monitoring Personnel.

The costs for UEBT's involvement in the process for the period of the step-wise approach shall be at the expense of the UEBT Member.

### 3.6.3 Inclusion of Supply Chains to a new or existing UEBT Certification

#### Policy

All Supply Chains to be added to a new UEBT Certification must have been monitored by the IMS and must be externally verified by means of documentation review or on-site audits prior to their inclusion.

All Supply Chains to be added to an existing UEBT Certification must be internally monitored or externally audited prior to their inclusion.

#### Procedure

##### A) Inclusion of Supply Chains in Initial Certification Audits

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<sup>39</sup> See the UEBT Field Checklist



As a condition for UEBT Certification, the UEBT Member must undergo a full System Audit by an external auditor in order to assess compliance with the requirements of the UEBT Certification Program. These Initial Audits are more comprehensive than subsequent System Audits, as the Initial Audits comprise a full assessment of the Supply Chains to be included in the certification<sup>40</sup>. In cases where Supply Chains are proven to be very similar in their structure and procedures, and where they have proven to represent an overall low risk to the certification (on the basis of results of the IMS Monitoring activities), the auditor may opt to assess a representative selection of these Supply Chains, provided that they are included in the scope of the UEBT Member's IMS and are monitored and proven to be compliant with the UEBT Standard requirements.

#### B) Inclusion of additional Supply Chains to an existing Certification

A certified UEBT Member wishing to add Supply Chains to the existing certification may do so by following their own monitoring procedures for new Supply Chains. The concerned Organization at Source must have successfully passed a full monitoring visit or external audit and reached the minimum score for approval before it can be approved for the UEBT Certification Program. The UEBT Member shall inform UEBT and submit the audit report and relevant corrective measures evidence (if applicable) in due time once the Organization at Source has been approved.

For the inclusion of Supply Chains that differ widely from already existing supply chains in terms of structure, type of Ingredient, type of production, country of origin, or in its nature represents a high risk to the sound functioning of the monitoring system and certification in general, the UEBT Member must involve UEBT in the approval decision. In these cases, UEBT reserves the right to request for additional information and/or to require external verification (by means of documentation or on-site visit) to be conducted before the Supply Chain can be certified.

*Note: Adding Field Operators (not more than 20% per supply chain per year) to an existing Supply Chain is allowed within the scope of an existing certification. However, UEBT must be informed whenever the number of new Field Operators of an approved Supply Chain increases considerably, i.e. exceeds 20% of the original number of Field Operators.*

#### Work instructions

##### A) Inclusion of Supply Chains in Initial Certification Audits:

The UEBT Member submits all relevant information related to the Supply Chains to UEBT.<sup>41</sup> UEBT reviews the submitted information for completion. The information provided is the basis for determining the scope of the external System Audit at the Member. UEBT advises the external auditor accordingly. The external auditor determines on the basis of the information provided which Supply Chains are to be assessed as part of the Initial Certification Audit.

##### B) Inclusion of additional Supply Chains to an existing Certification:

Each time a Supply Chain is added to the existing certification, the UEBT Member proactively informs UEBT about the inclusion, and submits the respective internal monitoring report and related corrective measures evidence to UEBT.

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<sup>40</sup> See 3.5.1 Full System Audit at UEBT Member

<sup>41</sup> See Addendum I "Application for Certification"



UEBT reviews the documentation and advises the external auditor accordingly in preparation for the subsequent System Audit at the UEBT Member.

The UEBT Coordinator at Member proactively informs UEBT and provides all relevant information in cases where the Supply Chains to be included differ widely from already existing supply chains (as detailed above). UEBT reviews the submitted information and determines whether additional external verification (by means of document review or on-site audits) is required, or whether the concerned supply chains fall within the parameters of existing certification. UEBT notifies the UEBT Member within two weeks of the decision on how to proceed.

## 3.7 Policies regulating Certification Claims

### 3.7.1 UEBT Certification Claims

#### Policy

Once the UEBT Member is certified, public claims related to the UEBT Certification may be made for Ingredients from Supply Chains that fall under the UEBT Certification Program, i.e. for all ingredients that are sourced from Organizations at Source which are monitored according to UEBT Certification Protocol and are compliant with the Ethical BioTrade Standard requirements. Claims can only be made on the basis of valid UEBT certificates.

Public communication and claims about UEBT and the UEBT Certification must be in line with the UEBT communication guidelines and must be previously approved by UEBT. Requests for approval must be submitted to [claims@uebt.org](mailto:claims@uebt.org). The UEBT label is not intended for use on pack.

#### Procedure

The UEBT Coordinator at Member submits to UEBT a formal request for approval of the communication material and claims related to the UEBT Certification by submitting the respective material to UEBT at [claims@uebt.org](mailto:claims@uebt.org). UEBT reviews the material and provides feedback to the UEBT Coordinator within two weeks from the date of reception of the request. If approved, UEBT submits a written letter of approval to the UEBT Member.

### 3.7.2 Other Certification Claims

#### Policy

In the event that the UEBT Certification is linked to another program or collaboration with a partner organization for the use of on-pack label or other communication material other than UEBT material, the participation of the UEBT Member in the program/collaboration is subject to a formal approval to such program/collaboration by the respective partner organization, whereby following conditions apply:

- The UEBT Member must comply with all additional rules, requirements and processes that apply in the context of the program/collaboration.
- The UEBT Member or their client(s) shall adhere to the labeling and communication rules of the respective organization/program.
- The UEBT Member must be holding a valid UEBT Certificate.

### Procedure

The UEBT Coordinator at Member informs UEBT at the moment of application for (re-) certification about their willingness to participate in a specific program. In this case the UEBT Certification process will include the applicable additional standards, rules, requirements and processes for the respective program, and the UEBT Member will be assessed against these by the assigned CB Personnel, in addition to the UEBT Certification requirements. If successful, the UEBT Certificate will state all the additional standards, rules and requirements against which the UEBT Member has been assessed and for which compliance can be confirmed. The UEBT Coordinator at Member submits the UEBT Certificate to the partner organization, on the basis of which the UEBT Member may enroll in the respective program/collaboration. In this case the UEBT Coordinator communicates directly with the contact of the partner organization for all issues related to claims and communication.

## Glossary

**CB Certification Coordinator:** Person appointed at the Certification Body (CB) responsible for coordinating the UEBT Certification process.

**Certification Body (CB):** Legal or administrative entity that has the specific tasks to operate independent certification.

**CB Personnel:** Employees or subcontracted professionals working for the CB conducting activities related to the UEBT Certification. These include the CB Certification Coordinator and Auditors.

**External Audits:** Inspections conducted by third-party auditors at the UEBT Member, Organizations at Source and Field Operators for the purpose of assessing their compliance with the UEBT Certification Protocol and the Ethical BioTrade Standard requirements.

**External Auditors:** Qualified third-party auditors from approved Certification Bodies conducting audits for the purpose of the UEBT Certification.

**External Control System (ECS):** Rules and procedures for Certification Bodies regarding external audits and respective certification processes for the purpose of the UEBT Certification.

**Field Operators:** Operators at primary production level that are part of the UEBT Certification Program and that are subject to Monitoring visits and external audit control visits to confirm compliance with the Ethical BioTrade Standard requirements. Field Operators may be a single individual or a group of individuals that follow same values and practices and that can therefore be considered a unit for the purpose of monitoring and auditing.

**Ingredient:** For the purpose of the UEBT Certification, an Ingredient is a Natural Ingredient, in its raw form or one that has undergone simple physical processing, which has been approved for certification under the UEBT Certification Program.

**Internal Monitoring System (IMS):** System established by the UEBT Member for assessing and monitoring Supply Chains to ensure that these comply with the Ethical BioTrade Standard requirements.

**Local Coordinator at Source:** Person appointed at Source who is responsible for the Local Monitoring System at source level.

**Local Management System:** For the purpose of the UEBT Certification Program, Local Management Systems are the systems established at the Organizations at Source for managing Field Operators and ensuring compliance with the Ethical BioTrade Standard requirements.

**Local Manager at Source:** Person appointed at the Organization at Source who is responsible for the administration at source level related to the UEBT Certification.

**Local Monitoring System:** Systems established at local level that complement the monitoring activities of the IMS of the UEBT Member.

**Manipulate (Ingredients):** Pack/re-pack, process, or alter the ingredient in any way.

**Monitor(s) or Monitoring Personnel:** Person(s) appointed by the IMS at UEBT Member for conducting Monitoring visits and assessments of suppliers that are part of the UEBT Certification.



**Monitoring activities:** All activities conducted by the IMS personnel or the Local Monitoring personnel as part of the Internal Monitoring System of the UEBT Member.

**Monitoring visits:** Visits to Organizations at Source and Field Operators conducted by Monitoring Personnel of the IMS for the purpose of assessing their compliance with the Ethical BioTrade Standard requirements.

**UEBT Member:** Full UEBT Trading Member applying for UEBT Certification. Information on the UEBT Membership conditions and application process can be found under [www.ethicalbiotrade.org/membership](http://www.ethicalbiotrade.org/membership).

**Organization at Source:** Organization managing the Field Operators, responsible for implementation of the UEBT Standard requirements on behalf and/or by Field Operators.

**Shadow Audits:** Audits at which the external Audit observes the Internal Monitor conducting the monitoring activities for the purpose of evaluating Internal Monitor's performance.

**Source:** Area/region from which the specific Ingredient is sourced (i.e. cultivation/collection area).

**Supply Chain:** For the purpose of the UEBT Certification Program, a Supply Chain is the entire supply chain that has been selected for the UEBT Certification. It consists of a specific Ingredient or Ingredients that is/are sourced from a specific Organization at Source and processed/manipulated at specific processing organizations (if applicable).

**UEBT Coordinator at Member:** Person at UEBT Member level who is authorized and responsible to implement the IMS for Supply Chains.

# Addenda

## Addendum I: Application for Certification

UEBT Members applying for UEBT Certification must submit the following information:

1. A list of Ingredients from those Supply Chains (i.e. places of origin) that are to be covered under UEBT Certification, indicating whether these are cultivated or wild collected.
2. A list of all organizations involved in the sourcing of said Ingredients including street address, e-mail and telephone numbers of responsible personnel, as well as the nature of operation of said organizations (i.e. smallholder organization or companies involved in the gathering of the Ingredient, farms or plantations, processing facilities involved in collection, drying and packaging Ingredient, etc.)<sup>42</sup>
3. Overview of latest monitoring visits conducted, together with relevant findings that may have effect on the UEBT Certification.
4. Information on any assessments from external parties (universities, environmental organizations, NGOs or other published documents in support of the UEBT Member's responsible sourcing activities.
5. Access and Benefit Sharing Assessments for the relevant Ingredients from each of the Supply Chains to be covered under the certification.
6. Indication of the type of claim(s) it intends to make with regard to the certification, i.e. whether product- or project-related claims.

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<sup>42</sup> It is possible to add or change Supply Chains during the period of certification, provided that such additions or changes have been communicated to UEBT (See Policy 3.6.3 Inclusion of Supply Chains to a new or existing UEBT Certification)

## Addendum II: Profile of the UEBT Coordinator at Member

### Qualification requirements

The person eligible for the position of UEBT Coordinator at Member must:

- Be familiar with different cultures
- Be knowledgeable about ethical sourcing practices
- Have successfully completed the UEBT E-Training course and respective tests and case studies
- Have attended at least one complementary UEBT training provided by a UEBT staff member
- Have attended at least one training in environmental and/or social auditing
- Be familiar with auditing/monitoring requirements

### Roles and Responsibilities

- Act as primary contact between the UEBT Member and UEBT
- Implement and operate the IMS
- Guarantee the credible operation of the IMS
- Ensure that external audits will be conducted in a timely and efficient manner
- Ensure that the UEBT Member abides by all laws and regulations in general and ABS requirements in particular
- Proactively communicate with UEBT on issues that concern:
  - **Changes** to the standard, checklist, rules, procedures, contact person(s) and other that affect the performance of the IMS and that have implications on the UEBT Certification.
  - **Inclusions** of new Supply Chains to an existing certification.
  - Matters concerning compliance with the Standard that could represent **a major risk** to the UEBT Certification Program, a systematic problem/challenge, or for which there are doubts on how to deal with them.
- Ensure adequate allocation of resources
- Safeguard that the UEBT Member's internal standards and/or management system meets or exceeds UEBT requirements.
- Document all activities related to the sound operation of the IMS.
- Ensure adequate record keeping of above activities to demonstrate compliance.
- Provide proper training of (additional) personnel involved in the IMS to ensure that they are knowledgeable about UEBT requirements.



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- Appoint reliable personnel at the Organization(s) at Source acting as Local Coordinator(s) at Source to ensure system compliance.
- Organize the on-site monitoring activities
- Follow-up of Corrective Measures
- Coordinate external audits at UEBT Member and respective Organizations at Source.



## Addendum III: Profile of the Monitoring Personnel

### **Qualification requirements of Internal Monitors:**

Internal Monitors must

- Be familiar with different cultures
- Be knowledgeable about ethical sourcing practices
- Be experienced in auditing/monitoring activities
- Be familiar with the UEBT Ethical BioTrade Standard
- Have attended at least one training in environmental and/or social auditing
- Attend regular UEBT training related to standard requirements

### **Roles and Responsibilities:**

- Conduct on-site verification audits
- Verify the effective functioning of the management system of the operation at source
- Ensure that the management system requirements complies with UEBT requirements
- Identify any non-compliance issues at Field Operator level and their suppliers (if applicable)
- Complete the UEBT Field Checklist and submit it to the UEBT coordinator in a timely manner
- Request supportive evidence where necessary
- Verify relevant documentation by and at the Field Operator level
- Verify that the record keeping is up-to-date and complete
- Monitor that corrective measures are implemented within the allocated time period (If applicable)

## Addendum IV: Profiles of Local Managers and Coordinators at Source

### **Local Manager at Source**

#### **Qualification requirements:**

The person eligible for the position of Local Manager: must

- Be familiar with local cultures and environmental conditions.
- Have working experience with the production/sourcing of the Ingredient(s) subject to the UEBT Certification.
- Be knowledgeable about the ethical sourcing practices according to the UEBT Ethical BioTrade Standard and the UEBT Certification Program.

#### **Roles and Responsibilities:**

- Act as primary contact between the Organization at Source, the UEBT Coordinator at Member and (if necessary) with UEBT staff.
- Manage and monitor Field Operators with regards to the Ethical BioTrade Standard requirements applicable to them (field level requirements). This may entail providing/coordinating training and awareness raising events, technical advice, conducting Monitoring visits, providing necessary resources, following up on non-conformities and ensuring that corrective measures are implemented in line with the established measures and timelines.
- Coordinate the necessary activities at the level of the Organization at Source to ensure compliance with the Ethical BioTrade Standard requirements applicable to them (management system requirements).
- Facilitate and ensure timely access of Internal Monitors and external auditors to all persons, organizations and locations involved in the sourcing.
- Ensure that all relevant local personnel are familiar with the requirements in the UEBT Ethical BioTrade Standard.
- Ensure compliance with the Ethical BioTrade Standard requirements, both at the level of the Organization at Source and Field Operator level.
- Document of all activities related to the implementation of the Ethical BioTrade Standard requirements (management system and field level requirements, when applicable).
- Ensure adequate record keeping of above activities to demonstrate compliance.
- Ensure that additional personnel are trained in the UEBT Ethical BioTrade Standard
- Facilitate the monitoring visits at Source
- Facilitate external audits at Source
- Ensure that sufficient resources are available for fulfilling the tasks.

## **Local Coordinator at Source**

### **Qualification requirements:**

The person eligible for the position of Local Coordinator: must

- Be familiar with local cultures and environmental conditions
- Be knowledgeable about ethical sourcing practices
- Demonstrate technical knowledge and expertise to conduct on-site verification visits.
- The Local Coordinator at Source must participate in regular training related to the IMS as part of UEBT Certification Program.

### **Roles and Responsibilities:**

- Assist in the implementation and operation of the IMS at Source by coordinating the implementation of the Local Monitoring System.
- Guarantee the credible operation of the Local Monitoring System
- Ensure timely access of Internal Monitors (if required) and external auditors to all persons, organizations and locations involved in the sourcing.
- Ensure that all relevant local personnel are familiar of the requirements in the UEBT Ethical BioTrade Standard
- Ensure that all relevant information (monitoring reports, communication, relevant evidence) is documented; and ensure that important information related to the sourcing of the Ingredient(s) subject to certification, in particular that which may compromise the “compliant” status of the Organization at Source or a Field Operator, is communicated to the UEBT Coordinator at Member in a timely manner.
- Document all activities related to the sound operation of the IMS at source level.
- Ensure adequate record keeping of above activities to demonstrate compliance.
- Ensure that all relevant personnel are trained in the UEBT Ethical BioTrade Standard requirements.
- Facilitate monitoring visits at source
- Facilitate external audits at source
- Ensure that sufficient resources are available for fulfilling the tasks.

## **Addendum V: Outline of Traceability Requirements**

Product traceability is a critical requirement for the UEBT Certification. The UEBT Member must have a system in place to ensure that all Ingredient(s) subject to certification can be traced from the source of origin all the way through the UEBT Member to its client.

Specifically, all of the following traceability requirements apply:

- 1) The UEBT Member has a documented overview of the traceability system, which describes the procedures and record keeping process and the level of traceability<sup>43</sup> applied.
- 2) The UEBT Member formally appoints the personnel who are responsible for ensuring the sound implementation of the traceability system.
- 3) There is documented information about each of the Specific Supply Chains, including all stages of the production and transformation process. Critical control points for ensuring traceability of the Ingredients are identified for each of the supply chains.
- 4) The UEBT Member has established procedures to assess compliance with the traceability requirements at each of the critical control points.
- 5) There is a product identification system (coding system) in place for the ingredients under the certification that allows tracing the ingredients back to the producer/supplier. *If Organizations at Source supply products originating from both certified and not certified Field Operators, then the system ensure that Ingredients can be traced back to the level of the Field Operator.*
- 6) The UEBT Member keeps records of the sales/purchase documents related to the ingredients under the certification, including information of the producer/supplier, volumes, varieties, qualities, area of cultivation/collection (if relevant), date of delivery and other relevant information. The documents can be linked to the respective producer/supplier. Records are kept for at least two years.
- 7) There is a system in place that assures, verifies and monitors that
  - All products being sold as certified are indeed sourced from producers/suppliers included in the certification.
  - Volumes of ingredients sold as certified are never higher than the volumes supplied by the producers/suppliers under the certification.
- 8) If the ingredients are processed / transformed in any way that affects the volumes, information is available on the conversion rates and volumes before and after completion of the process. This applies to any stage in the supply chain.
- 9) If the Organization sources ingredients from producers that are not part of the certification program, then:
  - There is a way to distinguish between (UEBT) certified and non-certified ingredients in the sales/purchase documents.
  - There is a way to ensure that certified and non-certified ingredients are kept/handled separately in all stages of the sourcing and production process.
- 10) If services are outsourced to a service provider (i.e. for processing, transportation, storage) anywhere in the supply chain, there is a system in place that ensures that the ingredients remain traceable and that mixing with non-certified ingredients does not

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<sup>43</sup> Identity Preserved (IP), segregation, or other.

occur. Proof of compliance with the traceability requirements by the outsourced service provider is documented.

- 11) Ingredients that are sold as certified by the UEBT Member are only those sourced from the suppliers that have been approved for certification and did not have a 'suspended' status due to non-conformities, breaches of contract, or other at the moment of purchase.
- 12) The UEBT Member makes available to the Auditor at the annual Full System Audit an overview of the total annual volumes of certified Ingredients (per ingredient) received, still in stock and the total volumes (per ingredient) sold as certified.

Additional / changes of some of the requirements above may apply depending on the claims being made with the certification.

### **Addendum VI: Access & Benefit Sharing (ABS)**

Given the central role of ABS in Ethical BioTrade, the UEBT Certification Program requires an ABS assessment for all ingredients that will be subject to the UEBT certification. The ABS assessment aims to evaluate whether the UEBT Member has determined the possible relevance of ABS requirements to these ingredients, whether deriving from laws and regulations or the Ethical BioTrade Standard. If such relevance is determined, the UEBT Member is

expected to take adequate measures to comply with these requirements as a condition to UEBT certification.

### ABS applicability

The UEBT Member determines whether ABS requirements are applicable to its own sourcing, research, development, or commercialization activities linked to the Natural Ingredient. Such determination must be based on parameters established by any existing legal and regulatory requirements, as well as the Ethical BioTrade Standard.

The UEBT Member must also determine the applicability of ABS requirements to the activities of its suppliers. For example, if the company is purchasing natural inputs or ingredients from a country with laws or regulations on ABS, it must obtain information from its supplier on whether local cultivation, collection, processing or other activities are subject to ABS requirements.

The UEBT Member is not responsible for determining whether there are subsequent research, development or other activities along the supply chain that may be subject to ABS requirements. However, the UEBT Member has in place adequate disclaimers with regards to the Natural Ingredient to be certified. That is, it must communicate to its clients – through invoices or other documents accompanying sales or shipment of Natural Ingredients – that research and development activities may be subject to legal or ethical requirements on ABS and may require additional authorizations and/or administrative procedures.

### ABS compliance

If ABS requirements are found to be applicable to its own or its suppliers' activities linked the Natural Ingredient, the UEBT Member shall demonstrate compliance with these requirements as described below:

- In cases where legal and regulatory requirements on ABS are found to be applicable, adequate steps towards compliance with the respective requirements must have been undertaken.
- In cases where the Ethical BioTrade Standard requirements on ABS are found to be applicable, measures for complying with criteria 3.6, 3.7 and 3.8 of the Standard must be established.

### In practice

The ABS assessment comprises the following steps:

#### 1) Determination of ABS applicability

The UEBT Member determines, for each Natural Ingredient to be certified, whether ABS requirements are applicable. The UEBT Member submits to UEBT for review:

- Information on the approach taken for determining ABS applicability, including reference to the applicable legal and regulatory requirements, and
- Outcome of the determination of whether or not ABS requirements are applicable.

## 2) Measures for ABS compliance

If ABS requirements are found to be applicable to the Natural Ingredient, the UEBT Member takes adequate measures for compliance.

- If existing legal and regulatory requirements on ABS are found to be applicable, adequate steps towards compliance with the respective requirements must be undertaken.
- If the Ethical BioTrade Standard requirements on ABS are found to be applicable, proof of prior informed consent and mutually agreed terms must be provided.

The UEBT Member submits to UEBT for review, if applicable, proof of adequate measures taken to comply with the requirements.

## 3) Review by UEBT and ABS Approval Letter

UEBT reviews the documents provided by the UEBT Member on ABS applicability. If both the approach for determination and the measures are found to be adequate, UEBT will provide an approval letter of the ABS assessment process. The ABS approval letter is a pre-condition for certification and must be presented to the external auditor in the IMS audit.

If the approach for determination and/or the measures for ABS compliance are not found to be adequate, UEBT will provide guidance for the UEBT Member to take the necessary steps for rectification. Further technical support will also be available for the company, on a consultancy basis. There are no limitations for the company to resubmit the information on the determination approach and/or proof of implementation of adequate measures on ABS compliance.

It is responsibility of the UEBT Coordinator at Member Organization to ensure that the ABS approval letter is available and up-to-date in the audit.



## Addendum VII: Supply Chains, Field Operators and Organizations at Source

Supply Chains, Field Operators and Organizations at Source are the elements that determine the scope of the UEBT certification.

**A Supply Chain** consists of a specific Ingredient sourced from a specific Field Operator or group of Field Operators that are managed by a specific Organization at Source.

**Field Operators** are individuals (producers/collectors) or groups of individuals directly involved in the cultivation and/or collection of the Ingredients to be certified. They are considered the 'smallest unit' for the purpose of the monitoring activities.

The Field operators are subject to Monitoring visits on an annual basis (or less, based on risk<sup>44</sup>) - either by the IMS of the UEBT Member or the Local Monitoring System. Field Operators are also subject to external audits on a spot check basis. Field Operators will be assessed for compliance with the Field Verifiers of the UEBT Field Checklist (or equivalent)<sup>45</sup> applicable to them (field level requirements) as part of the monitoring of the Organization at Source.

Field Operators may be:

- Individual, small-scale producers/collectors or groups of producers/collectors who act collectively or uniformly (i.e. who follow same rules and procedures, in one same production/collection area), and who therefore can be considered as units. These may be, for example, villages of small-scale producers/collectors pursuing the same or similar agricultural practices. In these cases, the individual producers/collectors forming part of a group are subject to Monitoring visits and external audits on a spot check basis.
- In the case of plantations/farms with own land and own management systems, field operators are the individuals (employees, workers, family members) who are directly involved in the production/collection activities, or groups of individuals who act collectively or uniformly (i.e. who follow same rules and procedures, in one same production/collection area). In the latter case, individuals forming part of a group are subject to Monitoring visits and external audits on a spot check basis.

**Organizations at Source** are the units that manage the cultivation and/or collection activities of the Ingredients to be certified. They are directly responsible for compliance of the UEBT Ethical BioTrade Standard requirements applicable to them (management system requirements), and directly or indirectly responsible for compliance of the requirements applicable to the Field Operators (field level requirements) which they manage. Organizations at Source are subject to Monitoring visits on a regular basis and to external audits on a spot check basis, and will be assessed by monitors and auditors using the UEBT Field Checklist (or equivalent). The Scoring System, which determines the status of compliance of the Organization and its Field Operators with regard to the UEBT Standard requirements, is applicable at this level, whereby the assessment results at Field Operator level are an integral part of the final score.

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<sup>44</sup> See Policy 2.3.4 Exceptions concerning the Scope and Frequency of on-site Monitoring Visits

<sup>45</sup> See Policy 2.1.2 Equivalency of Standards

An Organization at Source may be:

- A company or organization that manages several field operators and that takes responsibility for the correct implementation of the Ethical BioTrade Standard requirements applicable to them. *Typically, an Organization at Source would be a cooperative, an association, an NGO, a farm/plantation with own land and own management system, or a company buying the ingredients from the field operators.*
- In exceptional cases, subject to approval by UEBT, an Organization at Source may also be a company or organization (within or external to the Supply Chain) managing several individual farms/plantations (with own land and own management systems). This is only possible if:
  - The farms/plantations are small to medium sized family businesses and have the same, or similar, management systems and operating rules and procedures,
  - All farms/plantations have been rated as low risk on the basis of a well-grounded risk-assessment conducted by the UEBT Member
  - The Organization at Source has high influence over the farms/plantations it manages.
  - The Organization at Source has a solid and functioning Local Monitoring System to monitor the farms/plantations with regards to their compliance with the UEBT Ethical BioTrade Standard requirements. Specific requirements for the Local Monitoring System apply in these cases, in particular with regard to documentation and record keeping<sup>46</sup>.

In these cases, the farms/plantations would be considered Field Operators for the purpose of certification.

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<sup>46</sup> See Policy 2.2.4 Establishing Local Monitoring Systems

## Addendum VIII: Description of the UEBT Scoring System

The UEBT Scoring System is an integral part of the UEBT Certification Checklist as well as the UEBT Field Checklist. It sets the rules for quantifying the results of audits, and establishes the minimum levels of compliance required for certification.

### Scoring Options

The UEBT Scoring System is based on the following scoring options:

Score	Description	Explanation
N/A	Not Applicable	A verifier is not applicable only when it does not apply to the circumstance or the reality of the business, area or product.
0	Not fulfilled	The issue has not been addressed / is not in place.
1	Partially fulfilled (insufficient): Improvement needed	The issue has been addressed / is in place, but not sufficiently for the purpose of the certification.
2	Partially fulfilled (sufficient): Improvement possible	The issue has been addressed / is in place sufficiently for the purpose of the certification. However, further improvement is possible.
3	Fulfilled	The issue has been fully addressed / is in place

Whereas:

- A score 0 or 1 means that the verifier is **not complied**
- A score 2 or 3 means that the verifier is **complied**

### Relevance

The UEBT Field Checklist differentiates between **critical** and **regular** Field Verifiers. Critical Field Verifiers are those considered essential (minimum) requirements for the UEBT Certification and which must be complied with at all times and by all parties participating in the UEBT Certification Program. Regular Field Verifiers must be complied with following the threshold rules outlined below.<sup>47</sup>

### Threshold for Certification

#### A) UEBT Field Checklist

In order to be eligible for certification, an Organization at Source must be compliant with

- All UEBT critical verifiers of the UEBT Field Checklist, AND

<sup>47</sup> See the UEBT Field Checklist for an overview of the critical vs. regular Field Verifiers



- At least 80% of the total of applicable Field Verifiers of the UEBT Field Checklist (or equivalent<sup>48</sup>)

#### B) UEBT Certification Checklist

In order to be eligible for certification, the UEBT Member must be compliant with all critical control points of the UEBT Certification Checklist. Regular control points that are not complied must be addressed by the time of the subsequent audit.

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<sup>48</sup> See Policy 2.1.2 Equivalency of Standards

## Addendum IX: Qualification Requirements for CB Personnel

### Qualification Requirements for the CB Certification Coordinator:

- a) Successful completion of a relevant post-high school (post-secondary school) training course.
- b) Successful completion of the UEBT Training Program outlined in Addendum X “UEBT Training Program”.
- c) Successful completion of ISO 9000/9001 lead auditor course OR comparable relevant working experience.
- d) Successful completion of SA8000 auditor course OR comparable relevant working experience.
- e) Work experience with certification of Management Systems and/or on the basis of social-environmental (sustainability) standards (at least 5 audits as auditor)
- f) Language skills: Good working knowledge of English, Spanish, French or Portuguese.

### Qualification Requirements for Auditors

#### 1. Auditors assigned for conducting IMS audits at UEBT Member:

- a) Successful completion of a relevant post-high school (post-secondary school) training course.
- b) Successful completion of the UEBT Training Program outlined in Addendum X “UEBT Training Program”.
- c) Successful completion of ISO 9000/9001 lead auditor course OR comparable relevant working experience.
- d) Experience in auditing Management Systems (at least 5 audits as auditor)
- e) Language skills: Good working knowledge of English, Spanish, French or Portuguese.

#### 2. Auditors assigned for conducting field audits at Organizations at Source and Field Operators:

- a) Successful completion of a relevant post-high school (post-secondary school) training course, such as Good Agricultural Practices (GAP), Integrated Pest Management (IPM) or organic production.
- b) Successful completion of the UEBT Training Program outlined in Addendum X “UEBT Training Program”.
- c) Successful completion of SA8000 auditor course OR comparable relevant working experience.
- d) Successful completion of ISO14001 auditor course OR experience in auditing on against social-environmental (sustainability) standards (at least 5 audits as an auditor).
- e) Language skills: Good working knowledge (verbal and written) of English, Spanish, French or Portuguese.

## Addendum X: UEBT Training Program

The UEBT Training Program consists of two components: 1) the UEBT Training Modules and 2) Accompanied Audits or Monitoring Visits. IMS and CB Personnel must complete one or both training components, depending on their tasks.

### 1) UEBT Training Modules

The UEBT Training comprises different training modules, which are relevant for both IMS Personnel and CB Personnel, depending on their respective tasks. The following table provides an overview of the UEBT training modules and indicates the respective target groups:

Training Modules	Applicable to:	
	IMS	CB
1) UEBT Certification and Audit Process	<ul style="list-style-type: none"> <li>• UEBT Coordinator at Member</li> </ul>	<ul style="list-style-type: none"> <li>• CB Certification Coordinator</li> </ul>
2) UEBT IMS and LMS Requirements	<ul style="list-style-type: none"> <li>• UEBT Coordinator at Member</li> <li>• Internal Monitors conducting LMS monitoring visits</li> <li>• Local Coordinators at Source</li> <li>• Local Managers at Source</li> </ul>	<ul style="list-style-type: none"> <li>• CB Certification Coordinator</li> <li>• Auditors conducting IMS audits at Member</li> </ul>
3) UEBT Standard requirements for Field Compliance	<ul style="list-style-type: none"> <li>• UEBT Coordinator at Member</li> <li>• Internal Monitors</li> <li>• Local Coordinators at Source</li> <li>• Local Managers at Source</li> </ul>	<ul style="list-style-type: none"> <li>• CB Certification Coordinator</li> <li>• Auditors Conducting IMS audits at Member</li> <li>• Auditors conducting Field Audits at Organizations at Source and Field Operators</li> </ul>

The training workshops can be provided by UEBT directly or by trained Personnel of the IMS or the CB, whereby the rules below apply.

#### **For IMS Personnel:**

- The UEBT Coordinator at Member and Internal Monitors must be trained by UEBT.

- The UEBT Coordinator at Member is responsible for ensuring that local personnel (Local Coordinators at Source and Local Managers at Source) are trained accordingly, either by UEBT or internally by trained personnel.
- The UEBT Coordinator at Member must remain up-to-date with developments in the UEBT Certification System and participate in refresher/up-date training sessions offered by UEBT, when applicable. He/she is responsible for ensuring that all IMS Personnel are informed in a timely manner about any changes and developments in the UEBT Certification System.

**For CB Personnel:**

- All CB Personnel must be trained by UEBT in the respective modules upon approval of the CB and before any UEBT audits are conducted.
- The CB Certification Coordinator must remain up-to-date with developments in the UEBT Certification System and participate in refresher/up-date training sessions offered by UEBT, when applicable. He/she is responsible for ensuring that all CB Personnel are informed in a timely manner about any changes and developments in the UEBT Certification System.

**2) Accompanied Audits or Monitoring Visits**

Both IMS and CB Personnel must follow the procedures regarding accompanied Monitoring Visits /Audits before they first start conducting Monitoring Visits / Audits for the purpose of UEBT Certification. The steps are outlined in the table below.

IMS Personnel: Internal Monitors	CB Personnel: Auditors
1. The (new) Internal Monitor observes an experienced and UEBT-trained Auditor or Internal Monitor conducting an Audit or Monitoring Visit for UEBT Certification.	1. The (new) Auditor observes an experienced and UEBT-trained Auditor conducting an Audit for UEBT Certification.
2. The Internal Monitor conducts a Monitoring Visit accompanied (observed & evaluated) by an experienced and UEBT-trained Auditor, Internal Monitor or by the UEBT Coordinator at Member.	2. The Auditor conducts an audit accompanied (observed & evaluated) by the CB Certification Coordinator of the CB or by UEBT a staff.
3. Internal Monitor may conduct Monitoring Visits by himself/herself, provided that the evaluation was satisfactory and confirmed by the UEBT Coordinator at Member.	3. The Auditor may conduct Monitoring Visits by himself/herself, provided that the evaluation was satisfactory and approved by the CB Certification Coordinator and by UEBT.
<i>Records of the process, including</i>	



*evaluation reports, must be kept for all Internal Monitors.*

*Records of the process, including evaluation reports, must be kept for all approved auditors.*

*Once successfully completed the UEBT Training Program, External Auditors receive a Certificate of Approved UEBT Auditor from UEBT.*

## Addendum XI: Roles and responsibilities of CB Personnel

### **Roles and Responsibilities of the CB Certification Coordinator**

The CB Certification Coordinator is responsible for the coordination of the UEBT Certification Program within the CB. This person shall be in charge of

- Supervising all CB Personnel involved in the UEBT Certification Program, in order to ensure a sound auditing and certification process in line with the requirements established in this protocol and respecting the established deadlines;
- Ensuring that all auditors conducting audits for UEBT comply with the training and qualification requirements as outlined in Addendum IX “Qualification Requirements for CB Personnel” and that they are up-to-date with new developments and regulatory changes related to the UEBT Certification Process.
- Planning and coordinating the external audits at UEBT Members and Organizations at Source and assigning qualified and suitable auditors to conduct such audits;
- Safeguarding quality, consistency and integrity of the auditing and certification process;
- Preparing recommendations for certification based on respective audit findings and putting these forward to UEBT within the established timelines.
- Keeping all documentation related to the certification process up to date;
- Proactively communicating with UEBT on the certification process. In particular, the CB Certification Coordinator shall
  - Inform UEBT about the date of the scheduled annual audit at the UEBT Member, and the selection made for the annual onsite spot checks of Organizations at Source;
  - Proactively inform UEBT about specific audit findings or other issues that might compromise the integrity of the UEBT Certification Program.
  - Ensure that UEBT Certification checklists are submitted to UEBT for review prior to submitting them to the UEBT Member;
  - Share any other relevant information, concerns, questions or comments arising from the audits with UEBT.
- The CB Certification Coordinator shall be the primary contact for UEBT and for the UEBT for all issues concerning the UEBT Certification Process.
- The CB Certification Coordinator may also act as an auditor for UEBT Certification provided that he/she fulfills all respective training and qualification requirements.

### **Roles and responsibilities of external Auditors**

External Auditors conducting audits for the purpose of UEBT Certification are responsible for

- Preparing and carrying out audits for the UEBT Certification, in line with the requirements and procedures outlined in this protocol

- At UEBT Member
- At Organizations at Source
- Reporting on audit findings using the relevant audit checklist:
  - UEBT Certification Checklist (for audits at UEBT Member) or
  - UEBT Field Checklist (or equivalent<sup>49</sup>) (for audits at Organizations at Source),
- Evaluating the organization being audited by applying the UEBT Scoring System (or equivalent<sup>50</sup>) outlined in Addendum VIII “Description of the UEBT Scoring System”.
- Providing feedback to the CB Certification Coordinator and/or to UEBT on queries related to any UEBT Audit conducted.
- Auditors report to the CB Certification Coordinator.

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<sup>49</sup> See Policy 2.1.2 Equivalency of Standards

<sup>50</sup> See Policy 2.1.3 Equivalency of the Scoring System