



Verifier and Inspector Guidance Update

Dear Verifiers and Inspectors,

This document is intended to supplement the “C.A.F.E. Practices Verifier and Inspector Operations Manual” and “C.A.F.E. Practices Verification Organization Approval Procedure.” This guidance update is divided into three sections: Program Document Updates, Verification Procedures and Methodology, and Indicator Interpretation and Updates.

Update Number 9.0–11/2015

1.0 Program Document Updates:

1.1 Generic and Smallholder Scorecards – Version 3.4

Version 3.4 (V3.4) of the C.A.F.E. Practices Generic and Smallholder Scorecards will be available in November of 2015. V3.4 incorporates some minor changes to the indicators and will replace the current version (V3.3). All applications claimed in the Verifier Reporting System (VRS) on or after December 1, 2015 will be V3.4. Version 3.4 of the Scorecards includes updates to current indicators related to canopy cover, labor intermediaries, children of school age and coffee drying. The new version also includes new indicators related to transparency and disclosure of information during verifications and bribery. Verifiers are responsible for reviewing all Scorecard changes with their inspectors and ensuring that all changes are understood prior to field inspections.

1.2 Field Notes – Version 3.4

Version 3.4 of the C.A.F.E. Practices Field Notes will be made available along with the updated Scorecards. The newest version of the Field Notes reflects the updates to the Scorecards, and a page to review PSO support in the Smallholder Farm Field Notes. Inspectors will be expected to use V3.4 Field Notes for all verifications claimed in the VRS on or after December 1, 2015.

1.3 Verifier and Inspector Operations Manual – Version 5.3

The Verifier and Inspector Operations Manual is in the process of being updated to include all procedures that have been created and/or updated for versions 3.3 and 3.4 of the C.A.F.E. Practices program. The updated version of the Verifier and Inspector Operations will be available in December of 2015.

1.4 Verification Organization Approval Procedure – Version 2.1

The Verification Organization Approval Procedure includes major relevant updates for verification organizations to consider in light of SCS office audits and participation in the program. The updated version of the Verification Organization Approval Procedure will be available in December 2015.

1.5 Verification Planning Template – Version 2.0

The Verification Planning Template has been updated to request additional information from verifiers about the proposed inspectors for each verification and information regarding translation support for verifications. The new template must also be used to record planned ZT-CAR verifications. The updated verification planning template will be available in December 2015.

1.6 Targeted VRS Reviews

SCS has now implemented a system of “targeted VRS reviews,” which are a higher-level VRS review designed to ensure accuracy of coversheet information, ZT-NCs, flows, volumes, yield, and consistency of indicator evaluations. Targeted VRS reviews are typically done in smallholder applications with many entities, or in groups of applications done by the same verification organization in the same country. Feedback from targeted VRS reviews will include specific points to update in the application as well as an excel sheet summary for that includes all entities from the applications that are covered by the review, and not just those entities that have specific feedback.

2.0 **Verification Procedures and Methodology:**

2.1 New VRS Inspector Reporting Tool

A major component of the V3.4 launch in C.A.F.E. Practices is the introduction of a new VRS inspector reporting tool. The new reporting tool will allow inspectors to navigate the scorecard more efficiently and synchronization is faster. In addition, a NC summary tool is built in to the program to assist with inspector review prior to and during the closing meeting. An important feature of the new VRS reporting tool is that it also is compatible with tablets which can be used during inspections to start reporting during the inspection. The new tool is built to support modern web browsers on desktops & mobile devices. There is no software to download because it can leverage the technology in the browser you already have installed. Supported browsers are Chrome (Windows, Mac or Android), Safari (Mac or iOS), or Firefox (Windows & Mac). The system can function on tablets using operations system of iOS 7 and higher, or Android 4.4 and higher.

While all inspectors will be required to use the new reporting tool, the use of tablets will be considered *optional*. The new interface will be available starting on December 1.

2.2 Warehouses

Coffee storage warehouses are now included in the C.A.F.E. Practices program. The main function of warehouses is for storage or export. These will be considered as a new type of entity. Inspectors should use the warehouse Field Notes for the inspection of warehouses. All warehouses will need to be evaluated for indicators in the Economic Accountability and Social Responsibility subject areas, and an assessment of traceability (CP-MT).

Note that *ALL* processors and warehouses that handle C.A.F.E. Practices coffee are considered part of the supply chain for a given application. If inspectors encounter a mill, processor or warehouse during the verification that is not included in the application, they should contact the verifier immediately and the verifier should contact SCS to determine whether a supply chain discrepancy is needed.

2.3 Processor Coversheet Updates

The coversheet information for processors will be updated to include a section for inspectors to specify the different type of activities conducted at the processor (e.g., storage; sorting; export; hulling). Inspectors will be required to complete this information for all processors that undergo verification.

The processor coversheet will now also include a section to specify products that are processed at the mill other than coffee (e.g., cinnamon; cocoa). Inspectors will be required to specify if other products are handled or processed at the mill, and identify the types of products. If the handling or

processing is under the same management as the rest of the mill AND it is done in the same physical location or facility, then the workers that handle the other products are *within* the scope of the verification. Workers that handle other products that are under the same management and at the same physical location as the coffee processing should be evaluated for all relevant indicators (e.g., Social Responsibility), *even if* they do not handle coffee. If handling or processing of additional products is encountered at a mill, verifiers should contact SCS immediately in case additional specific guidance is required.

2.4 Mill Validities

Verifiers should note that the First Response Letter that was sent from Starbucks to the supplier is the *only* reference that should be used to confirm the validity of all mills in an application. This guidance will also be updated in the VRS User Manual. If a verifier observes inconsistency in the mill being available for copy in the VRS but the mill is not listed in the First Response Letter, please contact SCS immediately for further guidance.

Verifiers will notice a recent change in the VRS that upon claiming applications in the VRS, mills with validities will often already have been copied into the application.

In addition to verifying potential mill copies in the First Response Letter, the verifier should also confirm with suppliers if any other verifications are being conducted concurrently to ensure that a mill is not verified twice. For any questions about mill validities, verifiers should contact SCS.

2.5 Harvest Definition for Mills and Warehouses

The harvest definition for dry mills has been updated to be applicable to all types of mills, including warehouses. The harvest definition for wet mills and farms will remain the same. The updates to the definition of harvest conditions will be effective starting December 1, 2015, as follows:

- A *wet processor* will be considered as ‘inspected during harvest’ if it is demonstrated through visual, interview, and documented evidence that machinery (depulpers, washers, fermentation tanks, water treatment systems) is operating or has been operating within one week preceding the inspection date.
- A *dry processor* and *warehouse* will be considered as ‘inspected during harvest’ if at least 50% of the total number of workers, including permanent and temporary workers, is present on the day of the inspection. The total number of workers is defined as the total number of workers employed in the course of an entire calendar year or an equivalent 12 month period.

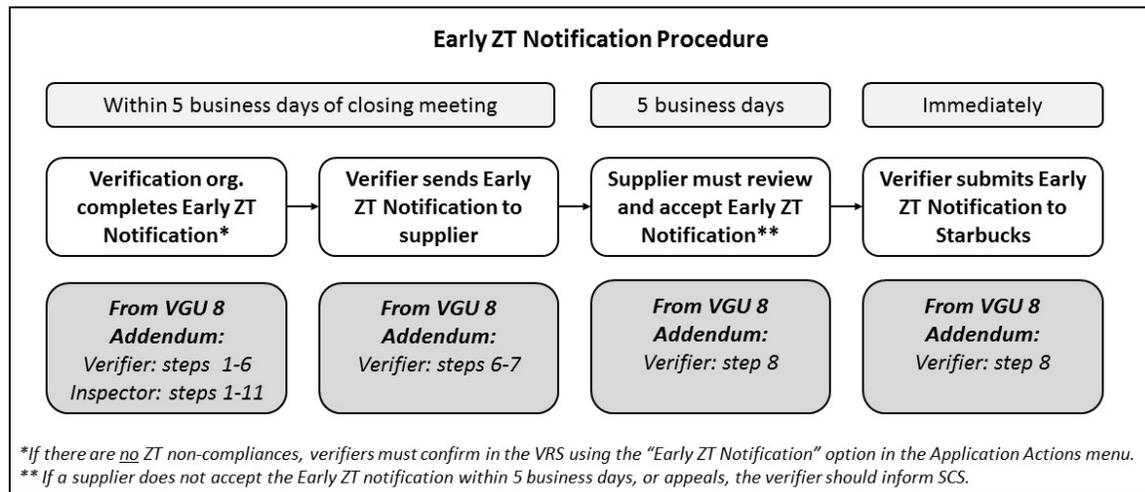
Verifiers are reminded when scheduling verifications to confirm with the supplier regarding the harvest status of mills, and the consequences of an off-harvest verification. A single standalone mill that is considered as “off-harvest” will cause a whole application to be “off-harvest.” Note that in some cases, the dry mill(s) in an application will only start operation near the end of harvesting activities on farms. Verifiers should ensure that their planning takes into account cases where a dry mill is operational near the end or after harvesting activities on farms in the application.

2.6 Farms in Multiple C.A.F.E. Practices Applications

In general, the same farm is *not* permitted to be included in multiple C.A.F.E. Practices applications. Verification organizations that discover farms during a verification that are potentially included in more than one application should contact SCS immediately. SCS will then determine if a supply chain discrepancy notification or changes to the farm sample may be required.

2.7 Early ZT Notification Reminder

Verifiers are reminded that suppliers must *accept* the Early ZT Notification in order for it to be submitted to Starbucks. After the supplier has accepted the Early ZT Notification, verifiers are required to then submit the Early ZT Notification to Starbucks. Early ZT Notifications must be sent to suppliers within 5 business days of the verification closing meeting, and to Starbucks within 10 business days of the closing meeting. A summary of the Early ZT Notification procedure is provided in the diagram below.



2.8 ZT-CAR Procedure Reminders

All planned ZT-CAR verifications need to be communicated to SCS using the Verification Planning Template. Please note that a ZT-CAR check *should not* be conducted until after Starbucks has reviewed the corrective action plan, and has confirmed with the supplier that they are ready for a ZT-check. The ZT-CAR report template will only be created in the VRS once the corrective action review has been completed by Starbucks.

In order to make the ZT-CAR process more transparent, the VRS will be updated as part of V3.4 to more clearly indicate:

- (i) when the review of the corrective actions has been completed by Starbucks and the application is ready for a ZT-CAR check;
- (ii) if a field or a desk check is required; and,
- (iii) if there is a specific time needed for the ZT-CAR check (e.g., during harvest).

In the meantime, verifiers should confirm with SCS prior to finalizing the planning for any ZT-CAR check.

2.9 Translation Support

In countries or regions with many different languages or regional dialects, or cases in which inspectors do not speak the native language of a country or region where inspections take place, verifiers must ensure that appropriate translation support is arranged. The Verification Planning Template will be updated to include information about when translators are required for a verification. Translation needs must be assessed in advance of a verification, and translators that are used must be independent and have some knowledge regarding appropriate terms that are used by the inspector (e.g., related to coffee farming or processing). Verifiers and inspectors are reminded that they should not rely on supplier representatives (e.g., PSO staff) for translation support.

2.10 Combined Inspections/Bundled Service Offerings

Verification organizations in the C.A.F.E. Practices program may offer a bundled service which combines a C.A.F.E. Practices verification with other certification programs. In general, this is viewed as a beneficial service offering to suppliers. However, if a verification organization conducts a C.A.F.E. Practices inspection concurrently with another service offering, it is important that inspectors ensure that suppliers are aware of the differences between a certification program and a verification. For example, it is important to remind the client that C.A.F.E. Practices is not a “pass/fail” system like a certification, and operates differently in some aspects. Furthermore, because there are specific requirements for C.A.F.E. Practices closing meeting (e.g., closing meeting signature form) it will be necessary to ensure that the closing meetings for combined certification audit and C.A.F.E. Practices verification are kept separate in such a way that the specific aspects of each program are discussed and highlighted.

2.11 Workers at Integrated Estates

Inspectors should count farm and mill workers *separately* at integrated estates, and avoid “double-counting” workers on Field Notes coversheets. The worker numbers should be divided between the farm or mill Field Notes coversheets based on the normal duties of workers during harvest time when the wet mill is operational. If a worker has duties at both the farm and at the mill, the inspector should only count the worker once and include the worker in the coversheet for one entity based on where the majority of the worker’s time is spent. For example, an integrated estate employs a total of 50 workers and 10 of those workers usually work at the wet mill during harvest, and the rest work on the farm. The inspector should record 10 mill workers on the wet mill coversheet and 40 workers on the farm coversheet. The inspector should record the information in this way, even if the 10 workers at the wet mill occasionally also work on the farm during the off-season or on the days when the wet mill is not operating.

3.0 Indicator Interpretation and Updates:

3.1 Labor Intermediaries

SR-HP1.17	ZERO TOLERANCE: Labor intermediaries are only used where legally permissible. Legal status of the intermediary can be demonstrated at the time of inspection. All necessary documentation from the labor intermediary is made available at the time of the inspection to support evaluation of relevant Social Responsibility indicators.
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SR-HP1.17 now refers *only* to the a) use of legal intermediaries where they are legally allowed; b) demonstration of legal status at the time of inspection; and, c) provision of all necessary documentation to support evaluations of Social Responsibility indicators for workers of labor intermediaries. This indicator is now focused on establishing whether the indirect payment or contractual relationship is legal or not, rather than pertaining to any aspect of the labor relationship. For this indicator, *legal status* refers to whether the labor intermediary has or requires legal status (e.g., needs to be a legally registered business), and, if so, whether the intermediary complies with legal requirements for the type of work that can be done by legal intermediaries.

The update prevents ZT-NCs for labor intermediaries that would otherwise *not* be ZT-NCs when workers are hired directly.

Verifiers and inspectors are reminded that ALL Social Responsibility indicators still apply for workers employed through labor intermediaries. With the revision in V3.4, SR-HP1.17 will apply only to the specific legal status of the labor intermediary. Other aspects of the employment relationship, such as benefits, will need to be evaluated with the relevant SR indicator (e.g., benefits – SR-HP1.8/SR-HP1.9).

Examples of what should be considered in the evaluation of SR-HP1.17 include:

For **subcontractors** (e.g., subcontracting agencies that provide security guards):

- *Does the subcontractor require a certain type of legal status?*
- *Is the business legal? Do they have a business license/permit?*
- *Is the type of work done by the subcontracted entity legally allowed?*

For **indirect payment through team/group leaders** (e.g., team leader of bag loaders):

- *Do the team/group leaders require a certain type of legal status?*
- *Is it legal that the payment is not directly from an official representative of the entity to the workers?*

Note that ALL other aspects of the labor relationship should be evaluated according to the relevant SR indicator. For example, wages for workers that are subcontracted or paid through a team leader should be evaluated through SR-HP1.1/1.2, benefits should be evaluated through SR-HP1.7/1.8, working hours through SR-HP3, and so on. All necessary documentation to evaluate these indicators should be available to the inspector on the day of the inspection.

Suppliers are responsible for ensuring that all documentation necessary to confirm legal compliance is made available at the time of inspection. Inspectors should issue a NC for SR-HP1.17 if the supplier has not arranged for all documentation to be ready at the time of inspection to confirm legal compliance. Verifiers should continue to emphasize to suppliers during the planning process that subcontracted workers (e.g., security guards, bag loaders, subcontracted agrochemical application) and other workers through labor intermediaries are within the scope of the verification.

3.2 Children of Workers that are Onsite

SR-HP4.1	<u>ZERO TOLERANCE:</u> Employer does not directly or indirectly employ any persons who are under the age of 14 or the legal working age (ILO Conventions 10 and 138).
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C.A.F.E. Practices does not allow for employment of children under the age of 14 or the legal working age, whichever is higher. While there can be some allowance for minor assistance or “light work” during the coffee harvest for children of ages 12 to 14¹ who accompany their family (e.g., occasionally picking coffee, carrying empty bags), the children should not be working alongside the parents for the same number of hours and conducting the same type of work. If children of age 12-14 are observed assisting their family, the inspector must ensure that the activities: (i) are not harmful to the child’s health and development, (ii) do not interfere with schooling or training, (iii) involve supervision of an parent or guardian, and (iv) must not exceed 14 hours a week. In no cases should children under the age of 12 be doing any type of work. If children under 14 are unaccompanied, SR-HP4.1 is Not Comply.

¹ The ILO Minimum Age Convention (C138; 1973) provides an allowance for light work of children of age 13-15, or in some circumstances/cases, 12-14 (Article 7; paragraph 4).

Inspectors should ensure during worker interviews that they document the ages of children on the farm, the duration of time assisting parents/family members (e.g., the number hours per day), the activities that the children conduct while on the farm, and if direct payment is made to any children.

3.3 Authorized Minors

SR-HP4.2	<u>ZERO TOLERANCE</u> : Employment of authorized minors follows all legal requirements, including, but not limited to, work hours, wages, education, working conditions, and does not conflict with or limit their access to education (ILO Convention 10).
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SR-HP4.2 has been updated to remove the reference to “age 14 or older” in the text of the indicator. The term “authorized minors” now refers to children between the ages of 18 and the age of 14, OR the legal working age, whichever is higher.

3.4 Children of Legal School Age

SR-WC2.1	<u>ZERO TOLERANCE</u> : Children of legal school age who live onsite or accompany family members who are working onsite attend school.
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The language of this indicator has been updated to clarify that it is applicable both to children who live onsite and to children who accompany family members who work at a particular entity.

If children of legal school age living onsite or accompanying parents on site are not attending school, inspectors must evaluate SR-WC2.1 as Not Comply, provide the age of the children, and include information about the reason that the children are not attending school.

3.5 Canopy Cover Indicators

CG-CB1.5	Canopy cover in the productive area has a diversity of tree species.
CG-CB1.6	Invasive species are not used for canopy cover in the productive area.
CG-CB1.7	Where conditions permit, locally native epiphytes, lianas and woody vines are retained in the canopy cover in the productive area.
CG-CB1.8	<u>EXTRA POINT</u> : Canopy cover in the productive area is kept at biologically significant levels (i.e., the level of canopy cover changes the farm's micro-climate, produces a noticeable leaf layer on the ground and creates an obvious habitat for a range of plant and animal species, etc.).
CG-CB1.9	<u>EXTRA POINT</u> : At least 40% of the productive area of the farm has canopy cover.
CG-CB1.10	<u>EXTRA POINT</u> : At least 75% of the canopy cover in the productive area is comprised of locally native species and/or the canopy consists of at least 10 species that are locally native or can be shown to contribute to the conservation of native biodiversity.
CG-CB1.11	<u>EXTRA POINT</u> : Shade canopy in the productive area consists of at least 2 identifiable canopy layers.

Clarification has been added to the CG-CB1 indicators to specify those indicators that apply to the canopy of the *productive area*. Inspectors should evaluate these indicators based on the canopy cover of the productive area *only*, and therefore not include conservation areas, buffer zones, or

productive areas for other crops (if cultivated separately from coffee) in their evaluation of these indicators.

3.6 Land Conversion

CG-CB3.1	ZERO TOLERANCE: No conversion of natural forest to agricultural production since 2004 .
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Inspectors should evaluate CG-CB3.1 as Not Comply in the case that land has been converted for the purposes of agricultural production. The indicator refers to “natural” forest, which includes both primary and secondary forest. Conversion to agriculture of all types of ecosystem should be considered in evaluation of the indicator (e.g., cerrado/savanna in Brazil). Evidence for Not Comply evaluations should include the year in which the deforestation or land conversion occurred, the number of hectares converted, and the reason for the conversion. Verification organizations must contact SCS in any case that conversion from forest or other natural ecosystem to agricultural production has been observed.

3.7 Coffee Patio Drying

CP-EC1.2	At least 25% of parchment coffee is patio (sun) dried or dried in other energy efficient ways (e.g., greenhouses, raised beds, radiant solar drying systems).
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CP-EC1.2 has been clarified to include an established percentage for compliance for the amount of coffee that is dried at an entity using energy efficient mechanisms (e.g., sun drying; greenhouse). Inspectors should consider the portion of the total coffee volume processed by the entity that is patio dried when calculating the percentage to evaluate CP-EC1.2.

It is important to note that CP-EC1.2 may still be evaluated as Comply if the coffee is not dried from start to finish in the sun. For example, if the coffee is patio dried initially and then the drying process is finished mechanically, inspectors could still evaluate CP-EC1.2 as Comply, provided that at least 25% of the coffee is dried in this way.

3.8 Transparency and Bribery

SR-MS1.1	ZERO TOLERANCE: Entity provides transparency into their operations, policies, processes, and relevant records to Starbucks or its designated third party. Payroll records and time cards provided by management are true and accurate.
SR-MS1.2	ZERO TOLERANCE: Money and/or gifts of any type are not offered to Starbucks or its designated third party.
SR-MS1.3	ZERO TOLERANCE: Entity demonstrates a commitment to continuous improvement and engages in the improvement process.

New indicators SR-MS1.1 and SR-MS1.2 have been introduced to ensure and evaluate transparency in the verification process. SR-MS1.1 should be evaluated based on whether inspectors were provided with access to all areas and information requested during the verification, and whether the information provided was true and accurate. If an inspector does not believe that the information provided was true or accurate (e.g., fraudulent payroll documents), a full description of the issue should be included in the evidence for a Not Comply evaluation.

SR-MS1.2 refers to attempted bribery. Inspectors should evaluate this indicator based on whether the supplier provided any bribe or gifts in order to influence the outcome of the verification. Evidence for the indicator should include the type of the bribe. Further information regarding bribery and corruption is also included in the C.A.F.E. Practices Verification Organization Approval Procedure.

SR-MS1.3 has been added as a program principle, and although included in the Scorecards, will not be evaluated by inspectors.

3.9 Evidence Requirements for ZT Indicators

In general, all Not Comply evaluations for ZT indicators should be supported with detailed evidence in the Field Notes and VRS. While all C.A.F.E. Practices indicators require detailed evidence, the evidence requirements for ZT indicators is particularly important due to the fact that the information from the inspectors will be used in the creation of corrective action plans during the ZT-CAR process. SCS periodically reviews the quality of evidence for ZT-NCs and may contact verifiers to request that additional information or clarification is provided.

The *minimum* evidence required for all Zero Tolerance indicators is included in *Appendix A*. Verifiers and inspectors must use the appendix as a reference when completing evidence for ZT indicators that have a Not Comply evaluation.

APPENDIX A. Evidence Requirements for Zero Tolerance Indicators Evaluated as Not Comply

The requirements in this appendix refer to the *qualitative evidence* requirements for Zero Tolerance indicators that are evaluated as Not Comply. In addition to the requirements specified below, information must also *always* be completed in the quantitative evidence and sources of evidence fields in the VRS and Field Notes.

For those indicators marked by an asterisk, a citation to a legal reference must be provided in the qualitative evidence. The citation should include the title of the document, publication year, and relevant section or article.

SR-HP1.1*	<u>ZERO TOLERANCE</u> : All permanent workers are paid the nationally or regionally established minimum wage. If minimum wages for permanent workers have not been established, all permanent workers are paid the local industry standard wage. If workers are paid by production, wages meet the nationally or regionally established minimum wage, or, where minimum wage has not been established, the local industry standard wage.
SR-HP1.2*	<u>ZERO TOLERANCE</u> : All temporary and seasonal workers are paid the nationally or regionally established minimum wage. If minimum wages for temporary/seasonal workers have not been established, all temporary/seasonal workers are paid the local industry standard wage. If workers are paid by production, wages meet the nationally or regionally established minimum wage, or, where minimum wage has not been established, the local industry standard wage.
<ul style="list-style-type: none"> ○ Number or percentage of workers who are not meeting the minimum wage; ○ Tasks conducted by workers not meeting minimum wage; ○ Payment rate of workers who are not meeting minimum wage; ○ National/regional minimum wage or industry standard wage, including the legal reference; and, ○ For workers that are paid by productivity (i.e., piece-rate), evidence must include average productivity (e.g., kg/hr), price per unit (e.g., \$ per kg), average time required for meeting productivity, AND corresponding payment rate. <p style="text-align: right;">*LEGAL REFERENCE ALWAYS REQUIRED</p>	
SR-HP1.3*	<u>ZERO TOLERANCE</u> : Wages are paid regularly to all workers in cash, cash equivalent (check, direct deposit), or through in-kind payments (e.g., food), if legally permissible.
<ul style="list-style-type: none"> ○ Type of payment to workers; ○ Frequency of payment to workers; ○ Description of system of in-kind payments (if applicable); and, ○ Legal reference related to requirements for in-kind payments (if applicable). <p style="text-align: right;">*LEGAL REFERENCE MAY BE REQUIRED</p>	
SR-HP1.17*	<u>ZERO TOLERANCE</u> : Labor intermediaries are only used where legally permissible. Legal status of the intermediary can be demonstrated at the time of inspection. All necessary documentation from the labor intermediary is made available at the time of the inspection to support evaluation of relevant Social Responsibility indicators.
<ul style="list-style-type: none"> ○ Description of type of labor intermediary, including legal status; ○ Activities carried out by workers for labor intermediary; ○ Legal reference related to requirements for labor intermediaries; and, ○ Confirmation of whether all documentation was provided, and if not, which documentation was missing. <p style="text-align: right;">*LEGAL REFERENCE MAY BE REQUIRED</p>	

SR-HP4.1*	ZERO TOLERANCE: Employer does not directly or indirectly employ any persons who are under the age of 14 or the legal working age (ILO Conventions 10 and 138).
	<ul style="list-style-type: none"> ○ Age(s) of worker(s) under 14 or the legal working age; ○ Reference to the legal working age; ○ Activities conducted by workers under 14 or the legal working age; ○ Schedule of when children under 14 or the legal working age work and/or are present at the entity; ○ Payment system for work done by children under 14 or the legal working age, including whether payment is direct to the child or indirect (e.g., through parents or other person or organization); ○ Information about whether children are accompanied by a parent or legal guardian; and, ○ Any additional circumstances as to why the children are working and what the circumstances are (e.g., whether work is voluntary, how many hours children work, how long has this been occurring). <p style="text-align: right;">*LEGAL REFERENCE MAY BE REQUIRED</p>
SR-HP4.2*	ZERO TOLERANCE: Employment of authorized minors follows all legal requirements, including, but not limited to, work hours, wages, education, working conditions, and does not conflict with or limit their access to education (ILO Convention 10).
	<ul style="list-style-type: none"> ○ Ages of authorized minors**; ○ Legal reference for requirements for authorized minors; ○ Activities conducted by authorized minors; ○ Schedule of when authorized minors work and/or are present at the entity; ○ Payment system (if applicable) for work done by authorized minors; and, ○ Information about whether authorized minors are accompanied by a parent or legal guardian. <p style="text-align: right;">*LEGAL REFERENCE MAY BE REQUIRED</p> <p><i>**For the purpose of the indicator, “authorized minors” typically refers to minors above the age of 14, or the legal working age, up to their 18th birthday.</i></p>
SR-HP4.3	ZERO TOLERANCE: Employer enforces a policy of prohibiting discrimination on the basis of gender, race, ethnicity, age or religion (ILO Convention 111). <i>Written policy required for large/medium farms, mills, and warehouses with more than 5 employees.</i>
	<ul style="list-style-type: none"> ○ Confirmation of whether a written policy exists (if applicable); and, ○ If discrimination is observed, evidence should specify (i) the number and type of workers affected, and (ii) the type of discrimination observed.
SR-HP4.4	ZERO TOLERANCE: Employer enforces a policy that prohibits the use of forced, bonded, indentured, convict or trafficked labor (ILO Conventions 29, 97, 105 and 143). <i>Written policy required for large/medium farms, mills, and warehouses with more than 5 employees.</i>
	<ul style="list-style-type: none"> ○ Confirmation of whether a written policy exists (if applicable); and, ○ If forced, bonded, indentured, convict or trafficked labor is observed, evidence should specify (i) the number and type of workers affected, and (ii) the type of labor observed.

SR-HP4.5	<u>ZERO TOLERANCE</u> : The workplace is free from physical, sexual, and verbal harassment and abuse.
	<ul style="list-style-type: none"> ○ Number of workers affected by harassment and/or abuse; ○ Type of workers affected by harassment and/or abuse (provided that information does not put workers at risk); and, ○ Type of harassment and/or abuse, including person(s) responsible.
SR-HP4.6	<u>ZERO TOLERANCE</u> : Workers do not surrender their identity papers or other original personal documents or pay deposits as a condition of employment.
	<ul style="list-style-type: none"> ○ If original identity papers are required for employment, then details should be provided about the (i) types of identity papers that are surrendered and, (ii) length of time that identity papers are kept. ○ If a deposit is required for employment, then the evidence should specify the type and amount of deposit.
SR-WC2.1	<u>ZERO TOLERANCE</u> : Children of legal school age who live onsite or accompany family members who are working onsite attend school.
	<ul style="list-style-type: none"> ○ National legislation regarding mandatory school attendance, including the age or level to which children must attend school; ○ The number and ages of children living or working onsite; ○ The school and work status of each child (attends school: Y/N; works or helps on the farm: Y/N); ○ Types of activities that the child is doing on the farm; ○ The school and working hours of any children working or helping on the farm.
SR-MS 1.1	<u>ZERO TOLERANCE</u> : Entity provides access to all operations, policies, processes, and relevant records that are requested during the verification. All information provided during the verification is true and accurate.
	<ul style="list-style-type: none"> ○ Aspects of the operation that were not available during the verification; and/or, ○ Items provided to the inspector that were not true or accurate.
SR-MS 1.2	<u>ZERO TOLERANCE</u> : Money or other gifts are not offered to the inspector or other representative of the verification organization with the intention of influencing the outcome of the verification.
	<ul style="list-style-type: none"> ○ Type of money or other gift that was offered, and the reason for offering.
CG-CB3.1	<u>ZERO TOLERANCE</u> : No conversion of natural forest to agricultural production since 2004.
	<ul style="list-style-type: none"> ○ Date that land was converted; ○ Type of forest or land that was converted; ○ Purpose for land conversion; and, ○ Approximate area converted (in hectares).
CG-EM1.1*	<u>ZERO TOLERANCE</u> : Farm does not use pesticides that are listed by the World Health Organization as Type 1A or 1B, or that are banned according to national, regional, or local laws.
	<ul style="list-style-type: none"> ○ Active ingredient of illegal or prohibited pesticides used; ○ Purpose for use of illegal or prohibited pesticides; ○ Duration of time that illegal or WHO-listed pesticide has been in use; and, ○ Legal reference (if applicable) or specification of whether pesticide is listed as Type 1A or 1B. <p style="text-align: right;">*LEGAL REFERENCE MAY BE REQUIRED</p>

CP-MT1.1	<u>ZERO TOLERANCE</u> : Entity has a system and is tracking C.A.F.E. Practices coffee from initial purchase through point of export.
CP-MT1.2	<u>ZERO TOLERANCE</u> : Mill has a system and is tracking C.A.F.E. Practices coffee from initial purchase or intake through final sale or output.
	<ul style="list-style-type: none"> ○ Description of methods for keeping C.A.F.E. Practices coffee physically separate from non-C.A.F.E. Practices coffee (e.g., bag labels; storage areas; separate processing runs, etc.); ○ System of documentation used for ensuring C.A.F.E. Practices coffee is separate from non-C.A.F.E. Practices coffee (e.g., receipts; invoices; weigh-bridge tickets, etc.); and, ○ Deficiencies in the system of documents or physical segregation that would lead to mixing of C.A.F.E. Practices and non-C.A.F.E. Practices coffee.
PS-MT1.1	<u>ZERO TOLERANCE</u> : All supply chain entities have and implement a system to track the movement of C.A.F.E. Practices coffee from initial purchase through point of export.
	<ul style="list-style-type: none"> ○ Description of methods for keeping C.A.F.E. Practices coffee physically separate from non-C.A.F.E. Practices coffee (e.g., bag labels; storage areas; separate processing runs, etc.); ○ System of documentation used for ensuring C.A.F.E. Practices coffee is separate from non-C.A.F.E. Practices coffee (e.g., receipts; invoices; weigh-bridge tickets, etc.); ○ Information about ALL entities in the C.A.F.E. Practices supply chain, including farms and mills, as well as any other entity that handles coffee (e.g., collectors or farmer delegates that may collect coffee from farms and deliver it to wet mills); and, ○ Deficiencies in the system of documents or physical segregation that would lead to mixing of C.A.F.E. Practices and non-C.A.F.E. Practices coffee.
PS-MT1.2	<u>ZERO TOLERANCE</u> : Organization has an annually updated list of producers participating in the C.A.F.E. Practices program.
	<ul style="list-style-type: none"> ○ Date when the producer list was most recently updated; and, ○ Specific discrepancies between the list of producers in the approved C.A.F.E. Practices application and the list encountered at the PSO. In most cases, a supply chain discrepancy notification is also necessary.
PS-MT1.3	<u>ZERO TOLERANCE</u> : Each farm in the supply chain receives a receipt for coffee purchased.
	<ul style="list-style-type: none"> ○ Description of the receipt system that is used; ○ Information from farms that were visited during the verification and whether receipts were observed; and, ○ Explanation of system for coffee purchases, if no receipts are issued.
PS-EM1.1*	<u>ZERO TOLERANCE</u> : Producer Support Organization does not buy, distribute or apply pesticides prohibited under the World Health Organization Type 1A or 1B lists, or that are banned according to national, regional, or local laws.
	<ul style="list-style-type: none"> ○ Active ingredient of illegal or prohibited pesticides used or distributed; ○ Purpose for use of illegal or prohibited pesticides; ○ Duration of time that illegal or WHO-listed pesticide has been in use or distributed; and, ○ Legal reference (if applicable) or specification of whether pesticide is listed as Type 1A or 1B.
*LEGAL REFERENCE MAY BE REQUIRED	