

Certification Manual

Sustainably Grown V2.1 & Veriflora V3.2



SCSglobal
SERVICES

Setting the standard for sustainability™

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1. Introduction

Thank you for your interest in the SCS Global Services (SCS) Sustainably Grown and Veriflora certification programs. The mission of SCS is two-fold: 1) to recognize the outstanding achievements of companies, institutions and organizations who are meeting the highest levels of performance in environmental protection, social responsibility, product safety and quality; and 2) to stimulate continuous improvement on the path toward sustainability. The Sustainably Grown and Veriflora certification framework is designed to provide agricultural and horticultural producers from all over the world with a roadmap to satisfy the emerging market for sustainably produced crops and horticultural products. In order to use the Kingfisher Certification Mark on products, companies must demonstrate compliance with the requirements of the Sustainably Grown or Veriflora certification program through annual audits.

As an independent third-party certification body with over 30 years' experience, SCS develops scientifically informed and methodologically sound evaluation tools through which processes, practices and products are assessed and validated against certification programs. SCS adheres to a rigorous internal quality management system based on the principles of ISO 17065, the internationally recognized norm for third-party organizations operating product certification systems, which demonstrates SCS' commitment to:

- Providing high quality auditing services trusted by businesses and consumers;
- Maintaining its independent, third-party status, ensuring fairness and accuracy in certification; and
- Providing clients and stakeholders with a transparent and credible certification process.

This Certification Manual was developed to describe the certification process pertaining to the Sustainably Grown and Veriflora certification program. The manual includes a description of the prerequisites for participation in the Sustainably Grown or Veriflora certification program and a step-by-step description of the certification process.

Please contact our offices if you have any questions regarding the certification process or any other aspect of the Sustainably Grown or Veriflora certification program.

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2. Program Prerequisites

Applicants must be a legal entity and responsible for the production of the agricultural crop(s) or horticultural product(s) that are eligible for certification. Applicants must accurately complete the Application Form. The Application Forms are available online at www.SCSglobalservices.com/sustainably-grown-certification (Sustainably Grown) or www.SCSglobalservices.com/veriflora-certified-sustainably-grown (Veriflora), or can be requested by contacting SCS.

Upon receipt of the Application Form, SCS will scope the certification services requested by your company and shortly thereafter, provide you with a proposal. In pursuing certification, key determinants of timely processing include submitting a complete and accurate Application Form, and reviewing and returning a signed Work Order and Professional Services Agreement (PSA) to SCS.

At this point, SCS strongly recommends reviewing the Sustainably Grown or Veriflora Standard, downloadable at www.SCSglobalservices.com/sustainably-grown-certification (Sustainably Grown) or www.SCSglobalservices.com/veriflora-certified-sustainably-grown (Veriflora).

3. Key Terms

Agricultural Production Operation: The farming enterprise engaged in the production of the agricultural crop(s) or horticultural product(s) to be certified.

Agricultural Sustainability Plan: The written document, or collection of documents, that serves as an organizational tool for documenting and achieving sustainability goals and for complying with the requirements of the Sustainably Grown Standard.

Agricultural Production Plan: The written document, or collection of documents, that describes the protocols and procedures used by the Agricultural Production Operation in carrying out its daily functions and for complying with the requirements of the Veriflora Standard.

Annual Surveillance Audit: Audit conducted by an auditor approved by SCS to ensure ongoing conformity to the Sustainably Grown or Veriflora Standard. This audit occurs on an annual basis for the two (2) years in between the evaluation and re-evaluation audits and is required to maintain certification.

Appeal: A request by a certificate holder or applicant for formal reconsideration of any adverse decision made by SCS related to its desired status. Such a request will be resolved by SCS in accordance with the company's investigation process.

Application Form: The form used to collect information regarding the Agricultural Production Operation applying for certification, for the purpose of defining the scope of the evaluation audit or re-evaluation audit. An updated Application Form must also be submitted when the scope of the certification changes.

Audit Findings: The results of an evaluation of the Agricultural Production Operation against the requirements of Sustainably Grown or Veriflora. Findings can be described as Conformant (C), Non-conformant (NC), Recommendations (RECs), or Opportunities for Improvement (OFIs). Recommendations (RECs) are specific to Sustainably Grown.

Audit Plan: The plan developed by SCS and submitted to the client that details the audit date(s), audit scope, contact information for the auditor/audit team assigned to complete the work, and the daily agenda for the audit. The auditor generally makes contact directly with the client once the Audit Plan has been sent.

Audit Report: A report prepared by the assigned auditor and provided to the client upon completion of the audit following SCS technical review. The audit report provides details of the audit findings and identifies non-conformities (NCs) and Recommendations (RECs). Recommendations (RECs) are specific to Sustainably Grown.

Audit Scope: Outlines the focus, extent, and boundary of an audit. Specifically, the audit scope is determined by the following factors:

- Standard to which the entities will be audited;
- Entities, sites, and workforce to be included in the assessment;
- Processes and activities taking place at each site; and
- Crops or products produced at each site.

Certificate: The document issued by SCS indicating that adequate confidence has been provided that an Agricultural Production Operation is in conformance with the requirements of the Sustainably Grown or Veriflora program and signifying formal award of certification. Certificates are issued for 3-year periods that are subject to annual surveillance audits. The Certificate identifies the entity name and address; certification registration number; effective date of certification; expiry date of certification; scope of certification; as well as the name and address of SCS.

Certification Decision: The decision to grant, maintain, renew, expand the scope of, reduce the scope of, suspend, reinstate, or terminate certification.

Complaint: A written expression of dissatisfaction by any person or organization, relating to the activities of SCS' services, personnel and/or representatives of SCS, where a response from SCS is appropriately requested in accordance with the company's investigation process.

Closing Meeting: Meeting held between the auditor or audit team and management representatives at the conclusion of the onsite audit to review the Draft Findings and clarify next steps in the certification process.

Corrective Action Plan (CAP): Plan prepared by the client and submitted to SCS in response to non-conformities (NCs) and Recommendations (RECs) issued by the assigned auditor, describing corrective and preventive actions taken and the expected timeframe of completion. Recommendations (RECs) are specific to Sustainably Grown.

Critical Non-Conformity: A non-conformity (NC) having one or more of the following characteristics:

- An attempt to pervert the course of the audit through fraud, coercion, deception or interference;
- An imminent risk to workers' safety or a significant breach of workers' human rights.

An onsite follow-up audit may be necessary to confirm correction of a Critical NC, especially when corrective action can be evaluated only through interviews, observation and/or extensive documentation review.

Dispute: A complaint or appeal that cannot be satisfactorily resolved by SCS through the investigation process, such that the matter is referred to a Dispute Panel named by the SCS Advisory Board.

Draft Findings: A summary of preliminary audit findings during an evaluation audit or annual surveillance audit that is provided to the client by the assigned auditor during the Closing Meeting. The client signs two copies: one for SCS records and the other for client records (Sustainably Grown only).

Evaluation Audit: The initial audit conducted by an auditor approved by SCS to determine baseline conformity (initial evaluation) or ongoing conformity (re-evaluation) to the Sustainably Grown or Veriflora Standard.

Follow-Up Audit: A desk-based or onsite audit carried out following an evaluation audit or surveillance audit to assess the implementation and effectiveness of corrective actions.

General Conformance Level Indicators: A type of indicator under the General Conformance level. Clients must comply with 80% of these indicators in order to achieve certification. (Sustainably Grown only)

Major Non-Conformity: A non-conformity (NC) that if not corrected:

- May result in a systemic risk to the function and effectiveness of the quality management system or the integrity of crop(s) or product(s);
- Poses a danger to onsite workers, personnel and/or neighbors;
- Indicates failure to comply with any relevant local, national, or international law or regulation;
- Negatively affects confidence in the Agricultural Production Operation's claim on certified product(s); and/or
- Is the result of repeated failure, failure to implement a CAP, or failure to correct an NC within an allotted time.
- An onsite follow-up audit may be necessary to confirm correction of a Major NC, especially when corrective action can be evaluated only through interviews, observation and/or extensive documentation review.

Minor Non-Conformity: A non-conformity (NC) having one or more of the following characteristics:

- A temporary lapse, unusual or non-systematic, where the impacts of the NC are limited;
- Policy issue or misunderstanding where there is no evidence of a material breach;
- Presents a low risk to onsite workers and personnel;
- Does not represent a failure to comply with any relevant local, national or international law or regulation; and/or

- Prompt corrective action has been taken to ensure that it will not be repeated.

New Information Request (NIR): Written request by SCS to provide additional information to determine compliance with specific requirements.

Non-conformity (NC): A type of audit finding indicating non-fulfillment of a requirement. In the case of Sustainably Grown, an NC is issued against Required or General Conformance Level Indicators.

Summary of Findings Form: A form that specifies all Non-Conformities (NCs) and Recommendations (RECs) detected during the audit, along with the minimum number of NCs and RECs that must be closed in order to comply with the conformance criteria (See Section 5, Table 1: Degree of Conformance by Level). The client is responsible for selecting which NCs and RECs will be addressed in order to comply with the conformance criteria. (Sustainably Grown only)

Non-Conformity Report and Corrective Action Plan Form (NCR-CAP): The form used by the client to submit Corrective Action Plans (CAPs) and supporting objective evidence that sufficiently address the minimum number of non-conformities (NCs) and Recommendations (RECs) that must be closed in order to comply with the conformance criteria. Recommendations (RECs) are specific to Sustainably Grown.

Opening Meeting: Meeting held at the onset of the audit between the auditor or audit team and management representatives. The purpose of the meeting is to:

- Introduce the auditor or audit team (if applicable) and describe SCS' role;
- Review the Audit Plan and Audit Scope; and
- Explain the objectives and how the audit will be carried out.

Opportunity for Improvement (OFI): A type of audit finding issued against any conformance level indicator to record an observation of a possible issue that, if not addressed, may potentially become a non-conformity (NC).

Optional Conformance Level Indicators: A type of indicator under the Optional Conformance level. Clients must comply with 20% of these indicators in order to achieve certification. (Sustainably Grown only)

Pre-Assessment: A pre-audit (or 'rehearsal audit') prior to the certification audit, conducted by an auditor approved by SCS to determine audit readiness. This is an optional service and may include a limited scope off-site examination of documents and records, or onsite verification with worker interviews, depending on the client's needs. The pre-assessment report informs clients of any NCs and allows the operation to address them prior to the evaluation audit.

Professional Services Agreement (PSA): A legally binding document, signed by SCS and the client, providing the terms under which certification services are delivered and the responsibilities of the parties. A duly authorized representative of the client must sign and return the PSA, together with the Work Order (WO), before the certification process can proceed. In order for a certified client to maintain the validity of his or her

Sustainably Grown or Veriflora certificate, the certificate holder must maintain conformance to the terms of the PSA.

Recommendation (REC): A type of audit finding issued against Optional Conformance Level Indicators. 20% of Recommendations must be addressed to achieve certification. (Sustainably Grown only)

Required Conformance Level Indicators: A type of indicator under the Required Conformance level. Clients must comply with 100% of these indicators in order to achieve certification. (Sustainably Grown only)

Review: The process of determining whether a client is compliant with the conformance criteria of the Sustainably Grown or Veriflora Standard, and that the client has paid outstanding invoices and has signed the Professional Services Agreement (PSA). Review is conducted by a qualified SCS staff member who is not involved in the evaluation process nor in the review of CAPs.

Self-Assessment Checklist (SAC): The pre-audit form completed by the client to assess their operation against the requirements of the Sustainably Grown or Veriflora Standard and prepare for the audit.

Standard: The written requirements that an Agricultural Production Operation must meet in order to qualify for citing specific claims about a certified crop(s) or product(s) sold in the marketplace.

Kingfisher Certification Mark Labeling and Language Guide: Guidelines that provide direction on how to use the Sustainably Grown and Veriflora Certification Marks and the terms “Sustainably Grown” and “Veriflora” when making a certification claim.

Work Order (WO): Sent to the client confirming the audit services and Audit Scope, and the estimated fees. A duly authorized representative of the client must sign and return the WO, together with the Professional Services Agreement (PSA), before the certification process can proceed.

4. Step-by-Step Certification Process Description

- 4.1 The first step in the certification process is to submit the Application Form by email to sustainablygrown@SCSglobalservices.com. SCS will confirm receipt of the Application Form and will send additional information requests or confirmation of application approval.
- 4.2 After reviewing the Application Form, SCS may request additional information in order to clarify the audit scope. Once SCS has all the information necessary to define the audit scope, an estimated quote for the auditing services and administrative fees will be provided to the client in the form of a Work Order (WO) for the client’s review and approval. Please note that travel expenses are billed in the final invoice. In the evaluation audit year (Year 0, Year 3, etc.), a Professional Services Agreement (PSA) will be sent along with the WO. The WO and PSA must be signed and returned to SCS as soon as possible in order to authorize the audit project.

- 4.3 Once the signed WO and PSA are received, SCS issues a retainer invoice, representing 50% of the total estimated cost for the audit. Before the audit process can proceed, SCS must receive payment for the retainer invoice.
- 4.4 Upon receipt of the signed documents and payment of the retainer invoice, SCS initiates the audit planning process and sends the client an Audit Plan, which details the audit date(s), audit scope, contact information for the auditor(s) assigned to complete the work, the daily agenda for the audit.
- 4.5 The client is provided with the Self-Assessment Checklist (SAC) and other guidance documents to help prepare for the audit. During audit preparation, the client should also communicate clear information about the upcoming audit to workers, including a description of the purpose of the audit and worker interview procedures. Completion of the SAC is optional, but it is a useful tool for the client to assess their operation against the requirements of the Sustainably Grown or Veriflora Standard. The SAC covers each of the requirements in the Standard and allows the client to make an evaluation and add comments for each indicator. The SAC can be filled in by a variety of personnel (e.g., quality/food safety staff; production manager(s), head grower(s) and staff agronomist(s); Human Resources staff; administrative staff). Providing self-assessment information to SCS prior to the audit may contribute to efficiencies during the audit.
- 4.6 The initial, re-certification, and surveillance audits are conducted onsite using three primary methods: document review, interviews, and direct observation. The audit will begin with the Opening Meeting to address the audit scope, audit methodology, and any questions. The auditor will then inspect the site to collect and verify information by observing the operation, interviewing workers and management, and reviewing applicable documentation.
- 4.7 After compiling the information collected and drafting preliminary audit findings, the auditor will convene the Closing Meeting to review the Draft Findings and address any questions. At this point, the client has an opportunity to propose corrective action plans in order to address identified findings, but the auditor is not permitted to give specific guidance on corrective actions. The client must sign the Draft Findings and Acknowledgement Form, acknowledging the receipt and understanding of the preliminary findings.
- 4.8 Following the completion of the audit, the assigned auditor(s) will prepare the Audit Report, detailing the audit findings and providing a summary of any non-conformities (NCs), Recommendations (RECs), and Opportunities for Improvement (OFIs) identified. SCS will then conduct an internal review of the Audit Report.
- 4.9 The Audit Report and final invoice for the balance of auditing fees and travel expenses will be sent to the client by SCS generally within 20 business days from the date of the Closing Meeting, together with the Summary of Findings Form (SFF)¹, specifying the minimum number of NCs and RECs that must be closed in order to comply with the conformance criteria (see Section 5, Table 1: Degree of Conformance

¹ **Sustainably Grown only:** The Summary of Findings Form is only sent where the client is below the minimum compliance for General and Optional indicators.

by Level). The client must complete the SFF, indicating which NCs and RECs they will address in order to meet the conformance criteria, and return the completed SFF to SCS within 15 calendar days of receipt of the Audit Report. Full payment of the final invoice must be received by SCS before the certification process can be completed.

- 4.10 SCS reviews and approves the SFF and prepares the Non-Conformity Report and Corrective Action Plan Form (NCR-CAP) with the selected NCs and RECs. The client must then complete the NCR-CAP with corrective action plans (CAPs) to address the selected NCs and RECs and submit to SCS along with evidence of implementation within the timeframe specified, typically 30 calendar days from the date on which the NCR-CAP is sent to the client. In some cases, a more immediate response may be required and will be specified by SCS.
- 4.11 Once the completed NCR-CAP, CAPs, and evidence of implementation are received, they will be reviewed by a qualified SCS staff member, generally within 10 business days from the date of their receipt. If a CAP is deemed to address the issue that triggered the finding, it will be closed. If the CAP is not sufficient, SCS will send the client a New Information Request (NIR). Responses to NIRs must be received within 15 calendar days, or within the timeframe specified by SCS (typically not to exceed 30 calendar days). SCS may send clients up to four NIRs after the NCR-CAP is initially sent to the client. This means that all NCs and RECs must be closed within five rounds of CAPs, or an estimated 90 calendar days from the NCR-CAP delivery date (i.e., 30 days to respond to the CAP request, then approximately 15 days to respond to the NIRs, with a maximum of four NIRs). Failure to present CAPs and supporting evidence sufficient to close the NCs and RECs within these limits will lead to certification denial (evaluation or re-evaluation audit) or certification suspension (surveillance audit). Depending on the nature of the finding and the proposed CAPs, SCS may need to conduct an onsite follow-up audit to confirm implementation and efficacy of the CAPs prior to making a certification decision. In cases where a CAP is deemed sufficient by SCS but the CAP is not able to be fully implemented by the client within five rounds of CAPs (i.e., initial CAP request followed by four NIRs), NCs and RECs can be closed on contingency that the evidence of implementation is submitted to SCS Program Staff when available, and confirmed through a desk-based or onsite follow-up audit, as determined by SCS.
- 4.12 When the NCs and RECs specified in the NCR-CAP (see 4.10) have been closed, the NCR-CAP will be presented to a qualified SCS staff member who is responsible for the Review and Certification Decision. Certification decisions are made by an SCS staff member who did not participate in the evaluation process nor in the review of CAPs. This separation of responsibilities ensures impartiality and objectivity in the certification decision process.
- 4.13 Upon successful certification, SCS will provide the client with the final Audit Report, certificate registration number, a digital copy of the Sustainably Grown or Veriflora Certificate, and the Kingfisher Certification Mark with the corresponding Kingfisher Certification Mark Labeling and Language Guide (if applicable). Certificates are valid for a period of three years from the date of the Certification Decision. Certified Agricultural Production Operations and crops or products are listed on the SCS website at

www.SCSglobalservices.com/food-and-agriculture-products. In cases where certification is denied, a written explanation will be provided. See Section 7 for more information about certification denial.

5. Certification Cycle and Conformance Criteria

5.1 Three-year Certification Cycle

The certification process is based on a three-year certification cycle, with the initial Certification Decision made during audit year 0 and subsequent Certification Decisions made every three years.

Annual surveillance audits will be conducted in the years between initial evaluation and re-evaluation audits (e.g., years 1, 2, 4 and 5) to assess ongoing conformance with the requirements of the Sustainably Grown or Veriflora Standard, along with full implementation of CAPs developed as a result of non-conformities (NCs) and Recommendations (RECs) issued from previous audits. The target timeframe for scheduling surveillance audits is generally between the date of the evaluation audit and the certification anniversary date. In some cases, depending on the timing and nature of activities at the certified site(s) (i.e., harvest, presence of workforce), the target timeframe for an annual surveillance audit may fall outside of this window (earlier or later). In all cases, there will be a final date identified by which the annual surveillance audit should occur. Surveillance audits follow the same auditing and reporting process as the evaluation audit described in Section 4. The NCs and RECs identified during surveillance audits must be closed in accordance with the compliance criteria in order to maintain Sustainably Grown or Veriflora certification in good standing.

Re-evaluation audits are conducted every three years (e.g., years 3 and 6) to assess continuous improvement against the requirements of the Sustainably Grown or Veriflora Standard. It is important to note that re-evaluation audits must be scheduled to allow enough time to complete the audit process (i.e., NCs and RECs must be closed) prior to the Certificate expiration. Re-evaluation audits follow the same auditing and reporting process as the evaluation audit described in Section 4, including issuance of a new three year certificate, provided that NCs and RECs have been satisfactorily addressed.

5.2 Sustainably Grown Conformance Criteria

During the evaluation audits and annual surveillance audits, the auditor will evaluate all applicable indicators. The non-conformities (NCs) and Recommendations (RECs) that must be closed in order to comply with the conformance criteria are specified in Table 1 below. This information will be communicated to the client in the Summary of Findings Form.

Table 1. Degree of Conformance by Level

Conformance Level	Percentage Conformity Needed to Meet Minimum Requirements	General Indicators	Environmental Indicators	Social Indicators	Economic Indicators	OVERALL POOL OF POTENTIAL INDICATORS
Required	100% of applicable indicators	22	44	92	6	164
General	80% of applicable indicators	0	31	32	6	69

Optional	20% of applicable indicators	1	50	68	20	139
OVERALL # OF INDICATORS BY CATEGORY		23	125	192	32	372

5.3 Veriflora Conformance Criteria

The Veriflora Standard establishes prerequisite requirements for producers, and provides two tiers of potential conformity upon which claims may be made. Tier 1 establishes the baseline performance for sustainable horticulture, while Tier 2 represents an even higher level of performance based on best management practices.

In order to be considered conformant to Tier 1 of the Standard, the Producer must:

- Conform with 100% of applicable pre-requisite (Section 6) and critical requirements (designated in Section 3.1 of the Standard); and
- Conform with at least 90% of the total applicable Tier 1 requirements (prerequisite, critical and non-critical) in the Standard and in the relevant sector-specific annexes.

To be considered conformant to Tier 2, the Producer must be fully conformant with Tier 1, and in addition, must conform to at least 80% of the applicable Tier 2 requirements in the Standard.

6. Certification Fee Schedule

Table 2 outlines the auditing and certification fees for Sustainably Grown or Veriflora certification. Auditor fees are dependent on auditor qualifications, geographic region, and other factors. The number of days required for auditing will depend on a variety of factors and is to be determined on a case-by-case basis. Fees for audits of multi-site operations and Producer Groups will be based on a visit to all central facilities, offices and operations, with a sub-set of production sites and producers, respectively, to be included as part of the audit process based on a sampling approach. SCS reserves the right to bill for additional time required to address, for example, a short-notice audit request or change in scope, or the review of complicated Corrective Action Plans (CAPs).

Table 2. SCS Certification Fee Schedule

Certification Activities	Description of Activities	Fees (\$ USD)	Years
Application Review	Application Review	\$250/Application Review	Every 3 years
Auditing: Audit Planning, Onsite Audit, Travel and Audit Reporting	Audit Planning	\$720/Day	Annually
	Audit and Audit Reporting	\$600-\$1,200/Day	
	Audit Travel Time	\$300-600/Day	
Certification Process: Non-conformity Reports (NCRs) and Corrective Action Plans (CAPs)	Issuance of Non-conformity Reports (NCRs) and Review of all Corrective Action Plans (CAPs) to Address Non-conformities	\$750/Project	Annually
		\$1,500/Project (Multi-Site)	
Certification Process: Certification Decision	Certification Decision	\$250/Project	Every 3 years
		\$500/Project (Multi-Site)	
Program Management	Program Management	\$500/Project	Annually
		\$1,000/Project (Multi-Site)	

7. Certification Denial, Suspension, and Termination

7.1 Certification Denial

SCS may deny certification if the non-conformities (NCs) identified during the audit have not been adequately addressed and closed to ensure minimum level of conformance. The following circumstances may lead to a denial of certification:

- Failure to present CAPs and supporting evidence sufficient to close the NC(s) within the timeframe specified in the NCR (see Steps 4.8 and 4.9).
- Identification of Critical or Major NCs against one or more of the ‘Required’ conformance level indicators, depending on the nature of the NC(s) and the CAP(s) submitted. Examples include, but are not limited to, environmental degradation associated with the Agricultural Production Operation, child labor, forced labor, human trafficking, sexual harassment, physical abuse, and non-discrimination. In such cases, SCS may require that the client address the NC by implementing corrective actions and then submit a new Application Form for certification, along with evidence of CAP implementation. Accordingly, a new evaluation audit would be conducted to confirm the implementation and effectiveness of corrective actions and to ensure that the reasons for denial of certification have been fully addressed.

If certification is denied, SCS will send a formal notification letter to the client explaining the reasons for the decision to deny certification. In all cases resulting in a denial of certification, a client may voluntarily elect to reapply to the program and begin the certification process anew.

7.2 Suspension

A Sustainably Grown or Veriflora Certificate may be suspended at any time for a maximum period of 6 months due to circumstances including the following:

- A substantiated lapse in compliance with the required conformance level during the interim period between annual audits;
- Failure to fully address NCs through CAPs within the timeframe specified by SCS during the surveillance audit cycle (see Steps 4.10 and 4.11);
- Identification of Critical or Major NCs against one or more 'Required' conformance level indicators during an annual surveillance audit, depending on the nature of the NC(s) and the client response to the NC(s) through the CAP process;
- NCs reopened during an annual surveillance audit due to failure to implement CAPs from previous audit;
- Allegation by a third party (e.g., a worker, worker organization, producer organization, or union) of non-compliance with one or more indicators (including non-compliances which were not identified during an audit) that would affect compliance with the overall conformance criteria, and which is substantiated through an investigation process;
- NCs identified during an unannounced audit against one or more indicators that would affect compliance with the overall conformance criteria, failure on the part of the client to facilitate an unannounced audit, or obstruction of the unannounced audit process by the client or the client's representatives;
- Voluntary withdrawal from the program. Examples of voluntary withdrawal include electing to forgo an annual surveillance audit and failure to schedule a required annual surveillance audit by the date specified by SCS. A lack of responsiveness on the part of the client to repeat SCS communications related to scheduling surveillance audits or closing NCs will be considered a voluntary withdrawal from the program, and may result in the client's certification being immediately terminated (see below); and/or
- Failure to meet contractual obligations (e.g., non-payment of fees).

In the case of a re-evaluation audit, the above listed examples would result in the expiration of the Certificate without renewal rather than suspension of the Certificate. At all other times, including annual surveillance audits and the interim period between annual audits (both surveillance and re-evaluation), the suspension process will apply.

Suspension notifications will be sent by SCS in the form of an email with an attached letter and may or may not include conditions for certification reinstatement, as follows:

- Conditions for reinstatement will typically be provided to allow clients recourse and an opportunity to respond with CAPs to the NCs identified. SCS may require a follow-up audit to confirm the implementation and effectiveness of CAPs, after which certification may be reinstated if the NCs are

closed. The follow-up audit should ideally take place within two months of the date of the suspension notice, and must be conducted no more than four months after the date of the suspension notice.

- Conditions for reinstatement will generally not be provided in the following situations: a systemic or willful lapse in compliance with the conformance criteria is observed; falsified or misleading information is presented to auditors or to the SCS non-auditing personnel; an assigned auditor is treated in a hostile manner; and/or Critical or Major NCs are identified for one or more 'Required' conformance level indicators, depending on the nature of the NC(s).

7.3 Termination of Certification

A client's certification may be withdrawn in situations where the outstanding issues leading to a suspension have not been addressed satisfactorily within the specified time period. When a suspension process has not resulted in the reinstatement of the certification, termination is the final step to render the Sustainably Grown or Veriflora Certificate null and void. An Agricultural Production Operation whose certification has been terminated may voluntarily elect to reapply to the program and begin the certification process anew.

8. Complaints, Appeals and Disputes

The client may disagree with the actions or decisions taken by SCS or its representatives during the certification process. In these cases, the client may lodge a formal appeal with SCS. An appeal may be made against any adverse decision taken by SCS within 30 calendar days of receiving notification of the decision. Adverse decisions may include:

- Refusal to accept an application;
- Refusal to proceed with an audit;
- Denial of closure of a non-conformity (NC);
- Decisions to deny, suspend or withdraw certification; and/or
- Any other action that impedes the attainment of certification.

The client may lodge an appeal or complaint by contacting SCS at Complaints@SCSglobalservices.com or by using the online form found at www.SCSglobalservices.com/your-feedback. Once the appeal or complaint is received by SCS, it will be reviewed and addressed according to the SCS Corporate Complaint, Appeal and Dispute Investigation Procedure available at www.SCSglobalservices.com/your-feedback.

9. Rights and Responsibilities

SCS clients have a right to non-discriminatory policies and procedures. Procedures are not used to impede or inhibit access to applicants. SCS makes its services available to all applicants whose activities fall within SCS' declared field of operation. Access is not conditional upon the size of the client's operations, or the number of certificates already issued.

The requirements against which a client is evaluated are those outlined in the applicable standard, the Professional Services Agreement (PSA) and other related documents. SCS confines requirements, evaluation and Certification Decision to matters specifically related to the scope of the certification(s) being considered.

For additional information concerning SCS client rights and responsibilities, please visit

<https://www.scsglobalservices.com/corporate-policies>.

10. Sustainably Grown Standard Development and Revision Process

The Sustainably Grown Standard underwent a revision in 2016, with the objective of leveraging stakeholder expertise through a public engagement process, fostering continuous improvement, and aligning with other industry-level initiatives related to sustainable agriculture and social responsibility. Diverse actors in the supply chain, including producers, retailers, and food service providers, as well as NGOs and other groups interested in sustainable agriculture, provided SCS with feedback to produce the Sustainably Grown Standard V2.1, benchmarked to ANSI/LEO-4000 and to the Reference Code of the Global Social Compliance Programme (GSCP). The Sustainably Grown Standard is subject to review every five (5) years, when it undergoes a formal public stakeholder consultation, open to all interested parties.

SCS welcomes feedback and comments on the Sustainably Grown and Veriflora Standards and scheme requirements in between consultation periods. They can be sent to sustainablygrown@SCSglobalservices.com or submitted using the online form found at <https://www.scsglobalservices.com/your-feedback>.

Appendix 1. Overview of the Audit Process

Figure 1. Pre-Audit Process

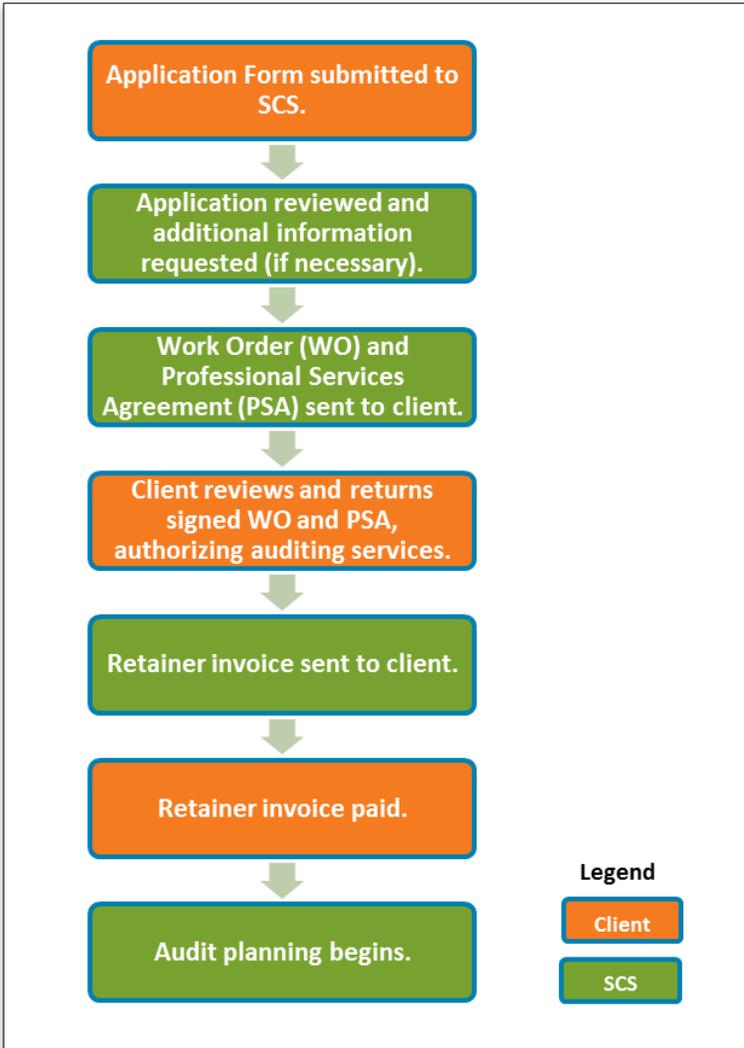


Figure 2. Certification Process (Evaluation Audit)

