

# Policy on Surprise Audits for Rainforest Alliance Certificate Holders

### Rainforest Alliance Surprise Audit Policy

<u>Preferred by Nature (PBN)</u> supports the use of surprise (unannounced) audits to monitor Certificate Holders (CH) compliance with the <u>Rainforest Alliance 2020 Certification Program</u>. Preferred by Nature has the authority to conduct surprise audits under section 1.5.50 of <u>SA-R-GA-1-V1.3 Certification and Auditing Rules</u> of the Rainforest Alliance 2020 Certification Program and section 4.1.f, of the Certification Agreement signed between the CH and Preferred by Nature.

Surprise audits are focused on specific areas of an operation, generally are of short duration, are conducted during normal business hours, and are not considered a replacement for the annual audit.

#### Cost of Surprise Audit

**PBN shall bear the costs of the surprise audits** that are additional to certification and surveillance audits.<sup>1</sup> If any nonconformities (NC) are identified during the surprise audit and a follow-up audit is deemed necessary, the CH shall make full payment to PBN for all costs involved in reviewing the closure of NC.<sup>2</sup>

### **Selection of Surprise Audits**

PBN shall conduct surprise audits (performed additionally to the certification and surveillance audits) for **10% of the PBN portfolio** of all Rainforest Alliance CH in the previous calendar year, rounded up to the whole next number with a minimum of one.<sup>3</sup> All surprise audits shall be done **on-site**.<sup>4</sup>

The CH to receive a surprise audit shall be selected by PBN based on risk and consider at least:5

- a. Requests received from the Rainforest Alliance (if any)
- b. PBN's risk analysis of the CH (taking into account the number and severity of NCs identified during the previous audit), the implementation of corrections and corrective actions, and other relevant justifiable reasons PBN may have, including possibilities of national law violations, violation to human rights and appearance in official databases that represent risk of credibility to the Rainforest Alliance and PBN
- c. Complaints received about the CH (e.g. from the government, NGOs, or the Rainforest Alliance)
- d. The time period that the annual audit was conducted (during the harvest or not)
- e. New CHs that are in their first year of certification
- f. CH that did not receive a surprise audit yet

#### Notification of a Surprise Audit

Generally, notification of an impending surprise audit is not provided to the CH. However, in some circumstances (such as requiring access to records, travel to an isolated area, or if there are concerns for auditor's safety) a brief notice to the CH may be given. PBN shall give a notice of **no more than 24 hours** of the surprise audit to the CH.<sup>6</sup>

<sup>&</sup>lt;sup>1</sup> SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 1.5.5

<sup>&</sup>lt;sup>2</sup> SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 1.5.46

<sup>&</sup>lt;sup>3</sup> SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 1.5.50

<sup>&</sup>lt;sup>4</sup> SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 1.5.52

<sup>&</sup>lt;sup>5</sup> SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 1.5.51

<sup>&</sup>lt;sup>6</sup> SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 1.5.53



# Policy on Surprise Audits for Rainforest Alliance Certificate Holders

PBN shall not share any information with the CH concerning the coming visit nor the audit plan. However, when having valid justification, the CB may decide to inform the CH, in writing, of the visit with a maximum of 24 hours prior to the first day of the visit, without sharing the detailed audit plan.

### Structure of Surprise Audit

The standard requirements and the sample to be verified during the surprise audit shall be defined by PBN and based on risk and include at least social topics (when applicable).8

For an unannounced audit, the CB shall conduct:9

- a) The opening meeting right after the audit team arrives at the CH's office or selected location where the audit team can meet one or more representatives of the CH.
- b) A facility/factory tour immediately after the opening meeting if the facility/factory is on the same location where the opening meeting is conducted.

## **Results of Surprise Audit**

PBN shall share the opening and closing meetings logs with the CH immediately after the surprise audit. PBN shall share the results of the surprise audit with the CH within 3 weeks of the last day of the surprise audit. If any nonconformities are identified during the surprise audit, they shall be closed within 10 weeks of the last day of the surprise audit for the CH to maintain its certification. If a CH fails to resolve any NC satisfactorily within the agreed timeframe, PBN shall take a non-certification decision, rather than issuing a suspension.

Where an NC is raised to a CH, the CH shall determine and implement the appropriate correction and corrective action to prevent recurrence of the NC.<sup>12</sup>

In the case of recurring, systemic and irreversible NC, PBN or the Rainforest Alliance **may decide to immediately** cancel the current certificate of the CH and issue a non-certification decision based on the surprise audit results.<sup>13</sup>

# **Refusal of Surprise Audit**

Refusal by a CH to undergo an unannounced surprise audit is **grounds for suspension of the certificate**. If the CH is not ready to receive the CB during an unannounced audit, the CB shall suspend the certificate of that CH.<sup>14</sup> Only in case of force majeure or with exceptionally valid reason which is determined at the sole discretion of the Rainforest Alliance, one exception may be given during one cycle of certification.

Suspension of the certificate shall be for a maximum of 3 months. <sup>15</sup> To lift the suspension, an additional on-site investigation audit shall be conducted within those 3 months. <sup>16</sup> The CH shall cover the costs of the additional investigation audit.

#### **Questions**

#### agriculture@preferredbynature.org

 $<sup>^{\</sup>rm 7}$  SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 2.3.9

<sup>&</sup>lt;sup>8</sup> SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 1.5.54

<sup>&</sup>lt;sup>9</sup> SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 2.7.30

 $<sup>^{10}</sup>$  SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 1.7.7 and 1.7.10

<sup>&</sup>lt;sup>11</sup> SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 1.7.37

<sup>&</sup>lt;sup>12</sup> SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 1.7.9

<sup>&</sup>lt;sup>13</sup> SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 1.7.14

<sup>&</sup>lt;sup>14</sup> SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 2.6.5

<sup>&</sup>lt;sup>15</sup> SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 1.7.33

<sup>&</sup>lt;sup>16</sup> SA-R-GA-1-V1.3 Certification and Auditing Rules, clause 1.7.36