



Verifier and Inspector Guidance Update
Update Number 17.0 – September 2023

Dear Verifiers and Inspectors,

This document summarizes the changes made in existing program documents. Please review them carefully and incorporate necessary changes into your operations.

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1. C.A.F.E. Practices Verifier and Inspector Operations Manual, Version 6.0

General Updates:

- The word “Applicant” was replaced with “Supplier.”
- Starbucks’ contact email was updated to cafepactices@starbucks.com.
- Language was modified throughout the document to clarify program requirements vs. best practices/recommendations.

3.0 C.A.F.E. Practices Program Terminology

Added:

- 3.38 Legacy application:** Any application that includes at least one farm in common with a more recent application. E.g., if application 11111FY20 contains at least one farm in common with 12222FY23 (a more recent application), then application 11111FY20 is a legacy application of 12222FY23
- 3.65 Status:** After a verification is complete and compliance with C.A.F.E. Practices is confirmed by a C.A.F.E. Practices administrator, suppliers will be granted an approval status depending on the score achieved. Supply chains with a score of under 85% will receive “Verified” Status, supply chains with 85% and over will receive “Strategic” status.
- 3.78 Validity:** For new and expired applications, C.A.F.E. Practices validity will begin on the same date the approval status is confirmed by a C.A.F.E. Practices administrator and ranges between one to two years.

In addition, the definition of Non-Conformity was updated to clarify that non-conformity and non-compliance, and conformity and compliance, are used interchangeably throughout C.A.F.E. Practices program documents.

5.2.3 Entities to be Verified

Processor (Wet) and Processor (Dry)

(For Standalone wet mills) Mills that have already been inspected during the previous or the same harvest period do not need to be re-inspected.

Warehouse

Any collector that stores coffee and hires at least one worker, needs to be considered a warehouse.

5.2.8 Verifier Interpretation

Guidance on interpretation of any C.A.F.E. Practices indicator, guideline, or document is provided by SCS as needed. *Inspectors should reach out to their verifiers in case any questions arise as to how to interpret a scenario for evaluation against the scorecard.* Verifiers may contact SCS with questions about how to interpret aspects of the C.A.F.E. Practices evaluation criteria, procedures, or other relevant issues *when guidance cannot be found within program documents.*

5.3.1 C.A.F.E. Practices Verifier and Inspector Responsibilities

This section was removed from the Operations Manual and transferred into the Approval Procedure, V3.

6.2.3 Contract between Verification Organizations and C.A.F.E. Practices Suppliers

The required sample was added to the list of minimum information required in a contractual agreement between the verification organization and the supplier.

6.2.4 Notifying SCS of Planned Verifications

Only verification organizations with Limited Approval are required to send SCS a verification planning template proactively. Verification organizations with provisional or full approval are not required to send SCS a verification planning template proactively but shall be prepared to send one to SCS upon request, within 5 business days from the date requested. Such Verification Planning Templates must only include applications that have not yet been claimed in the VRS at the time the document is sent to SCS.

6.2.5 Claiming Applications in the VRS

The requirement to claim an application at least 5 business days before the start of the verification was removed. Once the application is claimed, and before starting the verification, it is crucial that verifiers review the information presented in the VRS to ensure that it matches the original application presented by the supplier and used to plan the verification. In case of any differences, the verifier should contact the supplier to determine whether changes to the verification plan and contract are needed, or whether any discrepancies should be reported before the verification begins (following the supply chain discrepancy procedure explained in Section 6.4.6).

6.3 Conducting Document Review

The section was modified to accommodate remote document review procedures.

6.3.1 Remote Document Review – *New Section*

Remote document review, where an inspection team reviews select documents prior to onsite entity visits, is available as an option in the verifications process (when feasible) and is not mandatory. Furthermore, remote document review must be agreed to by both the verification organization and supplier representatives ahead of the verification. To determine feasibility of remote document review, the verification organization must coordinate with supplier representatives to confirm that requested documents are available in digital formats and that both parties have sufficient technological capacity (e.g., internet connectivity) for the materials to be shared and reviewed in a secure way.

As maintaining data security and information confidentiality is critical when working in digital environments, the verification organization must arrange for the supplier to provide documents through a secure file-sharing platform. Importantly, remote document review is part of the verification process and, as such, must not commence until a contract has been signed and the application has been claimed in the VRS. The verification plan must include provisions specifying that any documents requested for remote review, but which were ultimately not provided, must be made available to inspectors at the time of onsite inspections. In addition, verification organizations must have a system to record which documents were reviewed remotely.

6.4.1 Preparing the Verification and Inspection Plans

The verification plan should provide a summary of all activities that will take place *remotely and* during the field inspections, including the ‘what, when, and where’ of all onsite and remote inspection activities. The verification plan must be given to the client at the onset of the verification process, with individual inspection plans distributed during the field inspection activity by the inspectors conducting the work. Verification organizations may choose to develop a list of activities and documents to be reviewed specific to each entity type (e.g., a template for PSOs, farms, and mills) that will be incorporated into the verification plan sent to the client.

6.4.3.2 Sample Intensity of Large Farms and Processors

Large farms and standalone mills must always be inspected in harvest. In cases where a large farm or standalone mill inspection is planned and at the time of the inspection the in-harvest qualification cannot be met, the inspector must not conduct the inspection. *The inspector must discuss with the entity representative whether harvest conditions can be met at a later time and postpone the inspection. If this is not possible, the inspector must remind the entity and supply chain representatives that off harvest inspections are not accepted, and inform the verifier of the change.*

The requirement for verifiers to inform SCS when inspections cannot be conducted due to harvest requirement has been removed.

6.4.4.1 Determining Farms to Visit: Re-verifications

- Specific instructions related to the VRS were replaced with a reference to review the VRS User Manual.
- If there is a discrepancy between the entities with zero tolerance evaluations identified in the Legacy ID of the VRS and the entities identified in the First Response Letter, the verifier should contact SCS immediately.

6.5.2 Opening Meeting

Conducting an opening meeting is mandatory at the beginning of each *on-site* inspection.

6.6.1 GPS Guidance and Methodology

Added GPS reading methodology to Medium/Large Farms: SW corner of plot (if no office, house, storage unit, or main entrance on the plot).

6.6.4 Volume Reporting and Confirmation

The requirement to report a discrepancy for entities that did not deliver coffee to the supplier over the last year was removed.

6.6.5 Coffee Flows in the VRS

In the case that an entity also sends coffee to a mill or warehouse outside of the C.A.F.E. Practices supply chain (i.e., to a non C.A.F.E. Practices supplier), inspectors are required to enter the outflow information in the coversheet of the entity. Farms, mills, and warehouses must send at least a portion of their coffee to another entity included in the C.A.F.E. Practices application to be considered part of the supply chain. *If the entity is newly engaged with the C.A.F.E Practices supplier and has not delivered coffee to them or their designated mills prior to the inspection, the inspector must clarify the designated mill(s) or warehouse(s) within the C.A.F.E. Practices application that will receive at least a portion of their coffee.* In cases where an inspector finds that an entity does not send coffee to any other entity included in the C.A.F.E. Practices application or is unable to specify the designated entity/entities within the supply chain responsible for receiving at least a portion of their coffee, the verifier should consider the situation as a supply chain discrepancy and follow the procedure in Section 6.4.6.

6.6.7 Additional Coversheet Fields for Farms and Processors

The question related to food security is now optional.

6.7.5.2 Assessment

Language added to clarify that the entity closing meeting for the PSO must be held after all small farm inspections have been completed.

10.1 Appendix A: Pre-Onsite Planning Checklist

Updated according to the updated requirements.

10.3 Appendix C: Evidence Requirements for Zero Tolerance Indicators

- Reference to the WHO Pesticide Classification was added to indicator CG-EM1.1
- Minimum required evidence was modified to clarify evidence that is required for Comply evaluation and for Non-comply evaluation.

2. C.A.F.E. Practices Verification Organization Approval Procedure, Version 3.0

3.0 Organization Approval Procedure

A correction was made to clarify that organizations that successfully complete the application process are granted limited, not provisional, approval in the program.

3.10 Non-Conformity Escalation Procedure

Deadlines for Non-Conformities that remain open after the first SCS review were clarified. If the minor NC remains open after SCS review, subsequent corrective action plans and supporting documents are required within 10 business days of receipt of SCS' response. If the major NC remains open after SCS review, subsequent corrective action plans and supporting documents are required within 5 business days of receipt of SCS' response.

4.3 Record Keeping

Inspection plans, the Auditing and Training Manual, Indicator Guidance Reference, List of Indicators that Require Documentation, and the ZT-CAP Manual, and post-shadow audit reports were added to the list of documents that organizations shall keep in their records, to be requested during office audits.

5.7 Personnel Records

This section was modified to clarify that organization do not need to provide SCS with a roster of personnel annually but should have up-to-date CVs of all personnel available upon request and to be checked during office audits. Additionally, organizations no longer need to send personnel documents to SCS for review as a first step in the approval process for inspectors, but rather are responsible for deciding which candidates are qualified to begin the process towards an approved inspector in the C.A.F.E. Practices program. SCS may request proof of qualifications at any point.

6.1 Requirements for Verifiers

Additional bullet points were added to the requirements for verifiers that were previously included in the Operations Manual, including ensuring inspectors are informed and kept updated on all applicable social and environmental legislation and guidance updates sent by SCS.

6.2 Requirements for Inspectors

An additional bullet point was added to the requirements for inspectors to mention that inspectors must respond promptly to verifier comments from internal review and comply with report writing deadlines to prevent delays in the submission of verification reports.

6.5 SCS Approval of New Personnel for Existing Approved Verification Organizations

SCS will no longer review all personnel documents for proposed inspectors but rather only for proposed verifiers. This section was modified to list the topics to be included in a verifier training for proposed verifiers. All required documents for inspectors and verifiers must be made available to SCS upon request and during annual office audits. It is the responsibility of the organization to assess the qualifications of proposed personnel and only to proceed with those who are deemed qualified to be successful inspectors

and verifiers in the C.A.F.E. Practices program. Organizations no longer need to wait for SCS personnel review in order to proceed with internal trainings. After SCS confirms that the new personnel have passed the required trainings and exams, SCS will provide the organization with written communication that the new personnel may receive a VRS account and begin to conduct verifications under observation.

6.6 SCS Approval of New Personnel for Newly Approved Verification Organizations

No changes have been made to this section, therefore it is important to note that a first step for any organization seeking to be an approved verification organization continues to be submitting all documentation listed in section 6.5 for all proposed personnel for SCS review.