

Certification Manual

Sustainably Grown & Veriflora

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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-certification 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-certification 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), or Opportunities for Improvement (OFIs).

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).

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 Opportunities for Improvement (OFIs) issued by the assigned auditor, describing corrective and preventive actions taken and the expected timeframe of completion.

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-certification) 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.

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.

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.

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) that must be closed in order to comply with the conformance criteria.

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).

Pre-Assessment: A pre-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.

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. Completion of the SAC is optional, but it is a useful tool for clients to assess their operation against the requirements of the 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. Providing self-assessment information to SCS prior to the audit may contribute to efficiencies during 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.

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 SGcert@SCSglobalservices.com or Veriflora@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), 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) 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. SCS will prepare the NCR-CAP form with all NCs required to be addressed by the client.
- 4.10 The client must then complete the NCR-CAP form with corrective action plans (CAPs) to address the identified NCs 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 form 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 form, 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 sufficient to bring the client into conformance with the specific indicator(s) that triggered the NC, the NC will be closed. If the CAP is not sufficient, SCS will send the client a new information request (NIR). A timeframe for responses to NIRs is established and communicated to the client (typically 15 calendar days from the date on which the NIR is sent to the client).
- 4.12 Critical nonconformities result in immediate suspension and must be closed within 6 months of the closing meeting. Once these have been closed, the suspension ends. Major NCs must be closed within 3 months of the closing meeting. Minor NCs must be closed within 6 months of the closing meeting. Failure to present CAPs and supporting evidence sufficient to close the NCs within these limits will lead to certification denial (evaluation or re-certification 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 the required time frame, NCs 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 (see 5.3 Follow-up Audits).

- 4.13 Full payment of the final invoice must be received by SCS before the certification process can be completed.
- 4.14 When the NCs 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 Certification Review and 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.
- 4.15 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. 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. Three-year Certification Cycle

5.1 Annual Surveillance Audits

In order for a certified client to maintain the validity of their Sustainably Grown or Veriflora certificate, the certificate holder must:

- Maintain conformance to the terms of the SCS Professional Services Agreement;
- Maintain conformance to the Standard requirements; and
- Successfully complete annual surveillance audits.

Annual surveillance audits will be conducted in the years between initial evaluation and re-certification 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) 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 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.

5.2 Re-certification Audits

Re-certification 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-certification audits must be scheduled to allow enough time to complete the audit process (i.e., NCs must be closed) prior to the Certificate expiration. Re-certification audits follow the same auditing and reporting process as the evaluation audit described in Section 4, including issuance of a new certificate, provided that NCs have been satisfactorily addressed and closed.

5.3 Follow-up Audits

In certain instances, SCS may require an onsite follow-up audit depending on the nature of the NCs and the proposed CAPs. Onsite follow-up audits may be required in order to confirm implementation of a CAP when a significant risk is identified (i.e. Critical or Major NCs) and/or when corrective actions can be evaluated only through interviews and extensive documentation reviews. The scope of the follow-up audit will include evaluation of the requirements specific to the CAPs to be confirmed and may also include additional requirements as deemed necessary based on findings onsite.

6. Conformance Criteria

6.1 Sustainably Grown Conformance Criteria

During the evaluation audits and annual surveillance audits, the auditor will evaluate all applicable indicators. Some indicators are progressive, meaning that they become applicable after the client has been audited to Sustainably Grown 3.0 for the stated number of years. There are also indicators related to Trailblazer Recognition claims. These indicators are only applicable if the client has stated that they would like to be evaluated to one or more optional claims.

6.2 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 a 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.

7. Temporary Exemption Procedure for Prohibited Pesticides (Sustainably Grown only)

7.1 Background

The aim of Sustainably Grown policies related to pesticide use is to minimize negative environmental and human health impacts while promoting economically viable crop production. SCS acknowledges that pest pressure can be severe and/or unexpected, with limited management options, and provides for temporary exemptions for pesticides containing the active ingredients listed in the Sustainably Grown – Pesticide Policy and Prohibited Pesticide Reference List through a technical review process. Temporary exemptions allow access to pesticides that are critical pest management tools where no alternatives exist, and provide time for growers to identify, trial and implement lower-risk pest management practices.

7.2 Temporary Exemption Request Process

Requests for temporary exemption are reviewed and analyzed by SCS in consultation with the IPM Institute of North America, Inc. For temporary exemptions that have been granted, the operation must ensure adherence to all label restrictions and applicable laws, as well as ensure that the prohibited pesticides are used in a manner consistent with the additional use restrictions detailed in the client's SCS Temporary Exemption Request Expert Review Report. The *Temporary Exemption Procedure for Prohibited Pesticides* outlines the specific steps to be followed by clients seeking a temporary exemption.

Temporary exemptions may be granted by SCS for a specific active ingredient, crop, and country/region. If granted, exemptions are valid for a one-year period. A request for a temporary exemption does not guarantee that an exemption will be granted. The temporary exemption request review process includes a formal assessment of risk based on actual or intended use of the pesticide, the availability of viable alternatives, plans for mitigation if an exemption were to be granted, and the process for evaluating alternatives to the prohibited pesticide.

Certified clients must submit temporary exemption requests a minimum of 60 calendar days before planned or anticipated use of the prohibited pesticide. New clients in the process of certification must submit the request at least 30 calendar days prior to their first audit. In extenuating circumstances (e.g., unanticipated/sudden pest outbreak), SCS may consider applications that are submitted after use of the prohibited pesticide. Temporary exemption requests after a prohibited pesticide use must be submitted to SCS within 14 calendar days, and late fees will apply to applications received after this timeframe.

Clients must complete a separate *Temporary Exemption Request Form* for each respective active ingredient and formulation, crop and country/region. As part of the request process, clients evaluate specific risks associated with the requested pesticide use by completing a Pesticide Risk Tool (PRT) analysis.

The completed *Temporary Exemption Request Form*, any supporting documentation, PRT analysis results, and the client's SCS Temporary Exemption Request Expert Review Report will be reviewed to inform SCS' decision related to exemption requests. Typically, SCS will follow up with additional questions based on information

provided in the Form. SCS will inform the client of the decision generally within two to three weeks after receiving all requested information, including responses to follow-up questions. If granted, temporary exemptions often include additional pesticide use restrictions to minimize risk. Exemptions are typically valid for a two-year period, though one-year exemptions may also be granted. During all subsequent audits, the auditor will verify client adherence to the requirements and conditions established in the temporary exemption. Auditors will also request residue testing results to assess potential dietary risk to consumers associated with application of the prohibited pesticide.

SCS is dedicated to a systematic, transparent, and scientifically-based process for reviewing requests for temporary exemptions for use of pesticides. A list of all granted temporary exemptions is publicly available on the SCS website.

7.3 Failure to Comply with Temporary Exemption Procedure

The unauthorized use of pesticides listed in the *Sustainably Grown – Pesticide Policy and Prohibited Pesticide Reference List* may lead to certification denial, suspension or termination.

8. Certification Denial, Suspension, and Termination

8.1 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, 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 discrimination.

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. In such cases, the client must resolve the NCs that were cause of certification denial by implementing corrective and preventive actions, and then submit a new Application Form, along with evidence of CAP implementation. Accordingly, a new evaluation audit will 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.

8.2 Suspension

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

- Contractual or administrative reason (e.g., non-payment of fees).
- Decision to forgo a surveillance audit or failure to confirm a surveillance audit within 30 days of audit due notification by SCS.
- Failure on the part of the client to facilitate an audit (including short-notice or unannounced audits). This could include obstruction of the audit process, presentation of false information or refusal to present information related to scope, engagement in threats or retaliation to participants of the audit by the client or the client's representatives. (An egregious incident will be cause for immediate consideration of certification termination). Failure to fully address NCs through CAPs within the timeframe specified by SCS during the surveillance audit cycle (see Steps 4.10 - 4.12).
- A substantiated lapse in compliance with the required indicators during the interim period between annual audits.
- Identification of Critical or Major NCs 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.

In the case of a re-certification audit, the above listed examples would result in the early termination or 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-certification), the suspension process will apply.

Suspension notifications including conditions of suspension will be sent by SCS in the form of an email with an attached letter.

When the suspension is a result of nonconformity, SCS will require a follow-up audit to confirm that the correct identification of the root cause(s) of the NC(s), and 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.

If a decision to reduce the scope of certification is made as a condition of reinstatement, the reduced scope of certification is clearly communicated to the Certificate Holder and specified in certification documentation and public information.

8.3 Termination of Certification

A client's certification may be terminated in situations where the outstanding issues leading to a suspension have not been addressed satisfactorily within the specified time period.

A certificate will be terminated due to systemic or willful lapse in compliance with the conformance criteria.

Circumstances that may lead to termination of certification include: 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 identification of Critical or Major NCs against one or more indicators that represent a serious risk to workers, traders, consumers, and/or the goodwill of SCS.

Termination notifications including conditions of certificate termination will be sent by SCS in the form of an email with an attached letter.

In cases resulting in termination of certification, an Agricultural Production Operation may voluntarily elect to reapply to the program and begin the certification process anew. In such cases, the client must resolve the NCs that were cause of termination of certification by implementing corrective and preventive actions, and then submit a new Application Form, along with evidence of CAP implementation. Accordingly, a new evaluation audit will 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.

8.4 Terms of Suspension and Termination of Certification

An Agricultural Production Operation whose certificate has been suspended or terminated must:

- Immediately stop making any claims of Sustainably Grown or Veriflora certification and cease any use of the certification mark;
- Within 24 hours, inform their customers whose purchase specifications include a requirement that products are Sustainably Grown or Veriflora certified that their certificate has been suspended or terminated; and
- Immediately prevent any nonconforming product bearing the certification mark from entering the supply chain.

9. Complaints and Appeals

9.1 Complaints

If a client wishes to make a formal complaint regarding the actions of SCS or SCS representatives, it may do so by contacting SCS Headquarters at complaints@scscertified.com. Formal complaints will be addressed by SCS in accordance with the SCS Corporate Complaint, Appeal and Dispute Investigation Procedure available at www.SCSglobalservices.com/your-feedback.

9.2 Appeals

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 by contacting SCS at complaints@SCSglobalservices.com or by using the online form found at www.SCSglobalservices.com/your-feedback. Appeals will be addressed by SCS in accordance with the SCS Corporate Complaint, Appeal and Dispute Investigation Procedure available at www.SCSglobalservices.com/your-feedback.

10. 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>.

11. Sustainably Grown Standard Development and Revision Process

The Sustainably Grown Standard underwent a major revision in 2022, 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 V3.0. 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. Any major revision to the standard shall be conducted in line with ISO 14020 and ISO 14024 requirements.

SCS welcomes feedback and comments on the Sustainably Grown and Veriflora Standards and scheme requirements in between consultation periods. They can be sent to SGCert@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

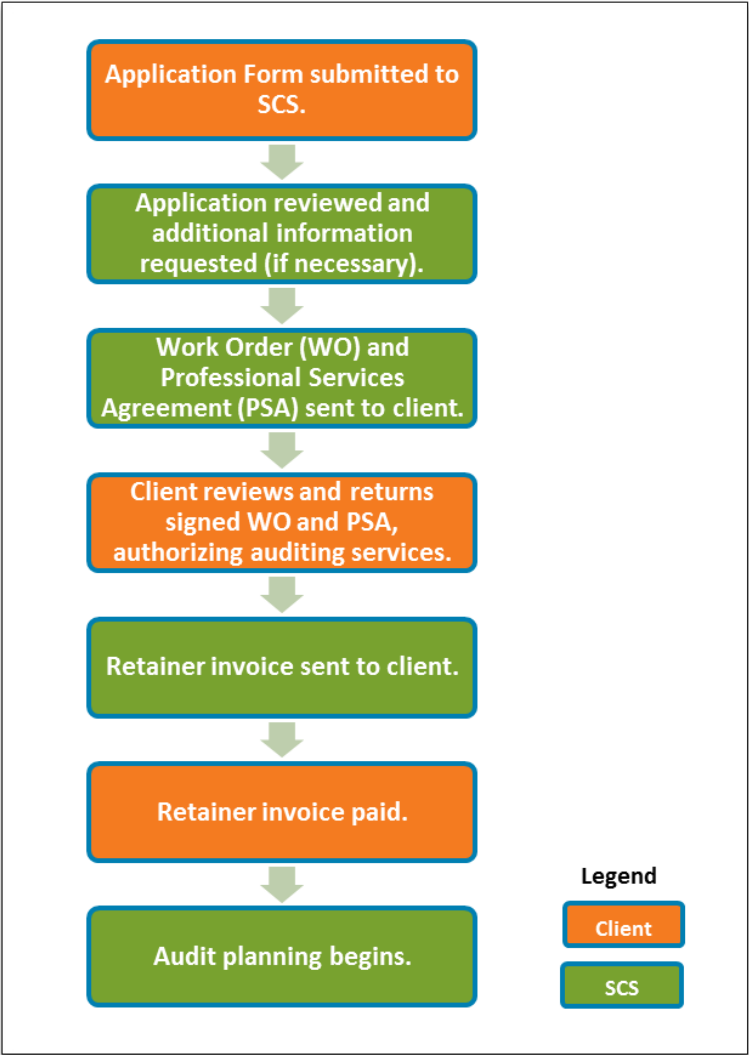


Figure 2. Certification Process (Evaluation Audit)

