



FAIRWILD STANDARD OPERATIONAL PROCEDURES: AUDIT AND CERTIFICATION

FairWild Foundation

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CONTENT

1	INTRODUCTION	2
2	BASIC PRINCIPLES FOR APPROVAL AS FAIRWILD CONTROL BODY.....	2
2.1	ACCREDITATION	2
2.2	AUDITOR QUALIFICATION	2
2.3	CONFIDENTIALITY	2
2.4	NO DISCRIMINATION.....	3
3	APPLICATION FOR CERTIFICATION.....	3
4	AUDIT PREPARATION.....	5
4.1	AUDIT PLANNING AND AUDIT FREQUENCY	5
4.2	INSPECTION ORGANISATION AND PRE-AUDIT COMMUNICATION.....	7
4.3	PREPARATION BY THE OPERATOR	7
5	FAIRWILD AUDIT	8
5.1	GENERAL AUDIT GUIDELINES.....	8
5.2	AUDIT PROCESS OVERVIEW	8
5.3	MANAGEMENT INTERVIEWS AND DOCUMENT REVIEWS	9
5.4	AUDIT OF THE COLLECTION AREAS AND COLLECTOR INTERVIEWS	9
5.5	AUDIT OF THE PROCESSING & STORAGE UNITS WITH WORKER INTERVIEWS.....	11
5.6	FINALISING THE ON-SITE AUDIT	11
6	FAIRWILD CERTIFICATION.....	12
6.1	EVALUATION; FINALISING THE RATING.....	12
6.2	CERTIFICATION	13
	<i>Certification Decision.....</i>	<i>13</i>
	<i>First Certification.....</i>	<i>13</i>
	<i>Positive Certification Decision.....</i>	<i>13</i>
	<i>Procedures in cases where certification cannot be granted.....</i>	<i>14</i>
	<i>Procedures in Case of Re-Certification.....</i>	<i>14</i>
	<i>Positive Certification Decision.....</i>	<i>14</i>
	<i>Procedures in Case Certification Cannot be Granted.....</i>	<i>15</i>
6.3	CONTINUATION OF CERTIFICATION	15
	<i>Communication.....</i>	<i>15</i>
	<i>Exceptional Withdrawal of Certification.....</i>	<i>16</i>
7	GRIEVANCE, COMPLAINTS AND APPEALS PROCEDURES	16
7.1	GRIEVANCE PROCEDURES FOR COLLECTORS, WORKERS AND EXTERNAL STAKEHOLDERS	16
7.2	COMPLAINTS AND APPEALS	17
8	TRADING AND LABELLING REQUIREMENTS FOR WILD COLLECTION OPERATIONS	17

1 INTRODUCTION

1.1 Overview

The FairWild Standard Version 2.0 is owned by the FairWild Foundation and applies to wild plant collection operations wishing to demonstrate their commitment to sustainable collection and appropriate resource management, social responsibility and fair trade principles by means of third-party-certification. The FairWild Standard ensures the sustainable use and long-term survival of wild species and populations in their natural habitats, while respecting the traditions and cultures, and supporting the livelihoods of all stakeholders, in particular collectors and workers.

These FairWild Standard Operational Procedures: Audit and Certification lay out the requirements for application, inspection and certification of wild collection operations, who wish to get certified and become a **FairWild Certified Collection Operation**. The document is designed to be read in conjunction with the FairWild Trading Rules, which defines the different types of operator in the chain of custody for FairWild ingredients, and how respective requirements apply.

Additionally, this document describes the applicable audit and certification procedures according to the FairWild Standard, which need to be followed by accredited control bodies (CBs) and lays out the requirements for CBs to become approved by the FairWild Foundation.

2 BASIC PRINCIPLES FOR APPROVAL AS FAIRWILD CONTROL BODY

2.1 Accreditation

FairWild control bodies (CBs) must be accredited according to the norms of ISO/IEC 17065. This includes standard procedures for all important aspects of activities and quality management of personnel.

The FairWild Foundation maintains a register of approved FairWild control bodies, which is published on the FairWild website. Applicant operators for FairWild certification are free to choose a CB of their preference from this list.

2.2 Auditor Qualification

FairWild CBs must ensure that the auditors used for FairWild audits are suitably qualified.

2.3 Confidentiality

The FairWild approved CB must have signed an agreement with the FairWild Foundation to keep all information gained in the course of the audit and certification process strictly confidential.

Confidentiality of data between the CB and its clients – the collection operation (operator) and the entity paying for the certification (mandator) – is regulated in a contract, which must be signed by three-parties in case the mandator is not the same entity as the operator.

All information gained in the process of audit and certification belongs to the respective operator and – if not the same entity – to the mandator, which is the entity applying for certification and paying the respective costs for audit and certification. This is why audit reports are always sent to both mandator and operator by the CB.

Information gained in the process of audit and certification may only be passed on to named third parties on the specific request of the mandator. This does, however not apply to the CB's accreditation agencies, to which such information might have to be disclosed and which in turn are strictly bound to confidentiality.

In signing a contract for FairWild certification, the mandator agrees that the audit report with related documentation and the certification decision will also be submitted to the FairWild Foundation for purpose of quality assurance and monitoring of the progress and challenging issues in implementation of the FairWild Standard.

The following information is considered public information and may be disclosed by certification bodies or the FairWild Foundation in publications or on request: A list of all FairWild certified operations including their name and address and certified products / activities. The certificate expiry date is also listed. In case the mandator and operator are different entities, the public list will not disclose the actual supplier of the product but only the name of the mandator, unless it is agreed by both parties that the operator may also be named.

If in the course of staff interviews confidential information is revealed, anonymity will be strictly granted in order to protect the informant from possible negative impact or punishment. No staff names will be revealed to the mandator nor the operator.

2.4 No Discrimination

The FairWild CB will accept all applicants that fall into the scope of the certification programme and have provided for all necessary application documents. However, the CB has the right to refuse applicants or certification for the following reasons:

- Screening of application documents gives evidence that collection practices may be damaging the target plant populations or habitats or be misused to cover up unfair and / or socially irresponsible practices.
- Lack of administrative capacity.
- Outstanding payments.

3 APPLICATION FOR CERTIFICATION

Application for certification according to the FairWild Standard is voluntary. Each collection operation, who wishes to become certified according to the Standard must fulfil the respective certification requirements and must be audited and certified by an approved CB according to the procedures outlined in this document.

	Application Procedures¹
I. Request for certification	<ul style="list-style-type: none"> • Applicants need to contact the FairWild Foundation approved CB and submit the FairWild application form (available from the CB), at least 4 months before the estimated start of collection season. The form must contain the specified information about the targeted species, the operation and scope of the collection. • Before accepting the offer, the mandator situation must be clarified in order to determine who shall receive the final audit report and whether the release of the report to third parties is approved. This is especially important where the application is made by a party other than the collection operation to be certified. • The CB will hold an initial discussion with the applicant on the feasibility, timeline and anticipated cost of scheduling an audit. If necessary, the CB will consult the FairWild Foundation at this stage to discuss any unusual features of the collection operation and/or target species, and the risk classification process.
II. Request for risk classification	<ul style="list-style-type: none"> • Following the initial discussion with the CB, the applicant should forward the application to FairWild Foundation to request risk classification of the target species. Risk analyses are carried out in collaboration with the IUCN/SSC Medicinal Plant Specialist Group. This request should be received by the FairWild Foundation at least 3 months before the proposed audit date. In the case of species where limited published information is available, or in times where a high volume of applications is received, a longer period may be necessary. • The applicant will need to pay an application fee to the FairWild Foundation to cover the cost of the review and risk classification. Any literature available on the species (scientific publications, etc.) that is not easily accessible should be submitted together with the application. The results of the risk classification are sent to the applicant and nominated CB.
III. Offer for Certification	<ul style="list-style-type: none"> • On receipt of the risk classification, the CB will provide the applicant with an offer for inspection and certification plus related documents for preparation of the audit (certification contract, operator profile, FairWild guidance manuals etc.). Any further questions on the scope of activities are clarified between the CB and the operator. • The cost of the FairWild inspection may depend on the number and extent of species to be certified, their classification into low-, medium- or high-risk species, and the number of days needed for travel, inspection and certification. Therefore, it is often not possible for the CB to provide an accurate estimate of costs before the result of the risk classification by FairWild Foundation is known.

¹ Application procedures contained in this document are also available as a summary document on the FairWild website.

	<ul style="list-style-type: none"> • If FairWild audits are combined with audits for other product certification schemes, the respective additional audit time and certification costs may be presented in one combined budget. A fees table must be provided by the CB upon request. • It should be noted that following completion of the inspection and certification process, the final amount charged by the CB may vary from the offer based on the actual time taken. This should be clarified with the CB as necessary. The first year(s) of certification are typically more time-intensive for the CB in terms of the audit preparation, evaluation and customer support required, and so costs may be higher than in later years.
IV. Confirming the Application	<ul style="list-style-type: none"> • The applicant can accept or reject the offer. If the offer is accepted, the applicant must make the prepayment specified by the CB (typically at least 80 % of the offer amount), and sign the contract for inspection and certification. By doing so, the applicant operation confirms that it will work according to the FairWild Standard and will grant access to all information needed for evaluation of performance. • On receipt of the prepayment and signing of the contract, the FairWild inspection is planned by the CB together with the applicant. The FairWild Foundation is informed of the finalized application. If the operator has already been certified by another agency according to the FairWild Standard, all certification documents from previous certification agencies are requested and the operator must submit information relating to past audits, in particular relating to negative certification decisions and any required corrective actions. • All documents required by the CB (e.g. operator profile) must be fully completed and returned before the audit can take place.
V. Procedures in case of re-certification	<ul style="list-style-type: none"> • By the beginning of the year after first certification, the holder of the certificate receives an offer for certification from the CB. • Should additional plants be targeted for FairWild certification, the company should inform the CB well in advance of the audit, and risk classification must be arranged with the FairWild Foundation. Plants usually cannot be added to the FairWild certificate during the course of the year; only at the time of the audit.

4 AUDIT PREPARATION

4.1 Audit Planning and Audit Frequency

As a standard procedure, a full on-site audit of each FairWild certified collection operation will take place once per calendar year. In certain climatic zones different inspection seasons (e.g. June to June) may be specially defined. Additionally, FairWild control bodies may at any time conduct unannounced spot checks or additional audits.

The operator has confirmed in the certification contract to grant the auditor unlimited access to all parts of the operational unit and all premises as well as all relevant documentation. The operator is also obliged to provide the CB with any information deemed necessary for the purposes of the audit.

The basic audit plan and the related necessary time needed for the audit is estimated based on the following basic guidelines:

Collection areas and collectors interviews

If the operation has several collection areas within the scope of the FairWild certificate, all distinctly different collection areas (different flora and fauna, different target species, different approaches to organisation of collection) must be visited, at least for the first audit. If there are several neighbouring, very similar collection areas, the areas can be spot sampled with at least 50 % of areas being visited by the auditor each year.

During the visit of the collection area, collectors shall be interviewed. As a general guidance the number to be interviewed shall be approximately equal to the square root of the total number of collectors collecting products for the operator at the site. Group interviews may be carried out as well as individual interviews. At minimum five interviews per distinct collection area shall be individual interviews; with visit to the collection site and/or collectors homes (if they carry out processing and / or storage).

Visit of processing units and worker interviews

All processing units must be inspected, and also the purchase centres of all visited collection areas. During the site visits, workers shall be interviewed.

Workers’ interviews are a key source of information to confirm / cross check information obtained from the management of the collection operation and to collect information on socially relevant aspects, especially delicate issues such as discrimination and sexual harassment.

Guideline Worker Interviews	
Small companies < 1000 workers involved in processing of wild plants	Square root of total number of workers involved in processing of wild plants, thereof at least 5 individual interviews
Very large companies > 1000 workers	Minimum: square root of permanent workers involved in wild plant processing + square root of temporary workers involved in wild plant processing 50% of total number of interviews have to be individual interviews

4.2 Inspection Organisation and Pre-Audit Communication

If the application has been approved and advance payment has been received, the CB sets the date of audit and defines the audit programme.

The FairWild CB appoints a qualified auditor, who will receive all relevant information and documents for preparation.

The time of audit will be chosen with regard to specific activity periods (e.g. peak harvest or processing time), to the risk classification and the availability of the auditor.

The duration and the audit plan of the on-site assessment is determined individually for each project, based on time requirements for worker or producer interviews (see audit procedure section), visit of the premises and document review.

The audit date is announced to the collection operation at least 14 days in advance and the overall audit schedule agreed. The operation also receives a list of documents to keep ready for the audit.

The FairWild Foundation has the right to accompany audits for quality assurance and training purposes. In such a case the operator and CB are informed at least 14 days in advance. Additional costs associated with an accompanied audit are borne by FairWild Foundation.

4.3 Preparation by the Operator

In order to perform an efficient and professional audit, the operator is requested to prepare the audit as thoroughly as possible. The company shall download and review the FairWild Standard Version 2 Performance indicators and perform a basic self assessment in advance of the audit. The operator shall be aware of the applicable requirements of the FairWild certification programme and shall have taken appropriate measures to ensure compliance, with action plans in place for requirements that can be implemented over a number of years. These measures will also be discussed in detail during the audit. For complex or high risk collection operations (see next section), preparation with the help of a consultant familiar with the FairWild Standard may be necessary to meet the certification requirements. A number of technical guidance manuals covering different aspects of the FairWild Standard are available on the FairWild website.

During the audit the people in charge (e.g. collection manager, factory supervisor, etc.) must be available in person. All collection and staff-related documents need to be ready for inspection, and necessary transportation to collection sites, purchasing and processing centres should be well organized.

Documents provided to the collection operation by the CB (e.g. data questionnaires, operator profile) must be completed before the audit takes place; open questions can be discussed with the auditor during the visit.

All procedures and documents related to the management of target species and their assessment need to be made available. If such procedures and documents are not yet in place, information needs to be given about plans to develop the procedures.

Documents include, but are not limited to:

- Collector lists, maps of collection areas
- Collection rules
- Plant specification forms
- Management plan (from Year 3 of certification, or Year 2 for high risk species).
- Resource assessment (from Year 2 of certification).

The level of detail of the above documents can vary according to the risk classification of the target species. For low risk species, a relatively simple resource assessment and management plan can be developed. For high risk species, a greater level of rigour in the management and monitoring processes is expected and support from a scientific institution or technical expert may well be needed.

All documents concerning the socially relevant activities of the operation must also be kept ready for audit:

- worker contracts, payrolls to staff, staff lists, working hour / attendance sheets, social security records,
- health and safety checks and certificates etc.
- statutes of collector organisation, procedures for FairWild Premium decision processes and administration of the FairWild Premium (once FairWild sales have taken place; these documents are not minimum requirements for Year 1 certification).

5 FAIRWILD AUDIT

5.1 General audit guidelines

Audit findings are captured in the audit report and annexes. Auditors should provide sufficient information to allow an informed compliance decision by the CB. Wherever possible, notes should be given that explain the auditor's assessment of compliance.

5.2 Audit Process Overview

The onsite audit will follow a number of steps.

- Opening meeting
 - shall ensure that the management and other company representatives understand the requirements against which the operation is being judged, the audit process, the timescale and activities of the audit and to re-confirm requests for information.
 - auditor presents himself/herself or the audit team and confirms the confidentiality of the findings.
 - auditor requests relevant documentation not yet received as part of the basic data questionnaire.
- Management interviews and document reviews - described in 5.3
- Visit of collection areas and interviews with collectors – described in 5.4

- Site tour processing and purchase unit(s) with worker interviews – described in 5.5
- Auditor pre-closing wrap up of findings and closing meeting– described in 5.6

5.3 Management Interviews and Document Reviews

Interview with management: Screening and updating (if necessary) of all basic descriptions of the operation.

Review and brief discussion of the existing FairWild management plan, resource assessment, collection area maps, collectors' lists and product assortment list.

Discussion of collection activities and review of documentation related to collection:

- monitoring of wild populations and sustainability of collection activities
- collection rules and plant specifications
- content and documentation of collector training

Verification of product flow is done partly during the document review, and partly during visits of the processing and purchase units: purchase records, receipts, processing charts, processing diaries, recipes, packing records, storage lists.

Verification of the fair trading relationship includes review of sales invoices; sales contracts with specified FairWild Premium. Feedback regarding the operation's trade relation to FairWild buyers is collected that will be used to countercheck with the FairWild principles for buyers (Principle 11). See the FairWild Trading Rules for further explanation.

Documentation related to employment of workers in the collection operation is screened (usually in HR department). This information is later cross-checked during worker interviews and onsite visits to the purchase and processing unit(s).

- Staff list; overview of wages, working hours, applicable benefits and general employment policies (e.g. in employee handbook).
- Staff files with contracts, age verification/identification, payment slips, grievances (if any).
- Documentation of working hours and overtime, with special focus on peak seasons.
- Detailed review of documentation related to wages: wage slips, actual payments, overtime payments, deductions for social security.
- Safety records. Fire drills and tests, emergency procedures, safety training for workers, safety checks for dangerous machinery.

The documentation and the production and handling system plan will later be cross-checked through the physical inspection of the operation units (e.g. collection areas, purchase centres and buildings) to cross-check findings in the field.

5.4 Audit of the Collection Areas and Collector Interviews

During the visit of a collection area the following issues are verified by physical inspection of the collection area and interviews with the collection coordinators and collectors.

- Collection areas clearly defined? Internal sources of contamination?
- Collection methods, who collects, post-collection activities / processing at collectors' houses.
- Sustainability of collection: healthy populations? Are the estimated optimum sustainable harvest amounts reasonable? Signs of overharvesting? Are internal collection rules being followed: collection only taking place during defined permitted periods, right plant sizes / parts?
- Feasibility and correctness of the resource assessment methodology and its implementation.
- Training of collectors, awareness of internal collection rules.
- Child labour and health & safety aspects in collection. Do collectors subcontract others to collect on their behalf - if so, under what conditions and supervision?
- Purchase records, handling during and after purchase (e.g. grading, packing, storing), transport, labelling at intermediate storage.
- Fair working conditions for staff in purchase centres. Cross check wages, working hours, discrimination, health & safety aspects in interviews with workers.

Collector interviews are key in verifying sustainable collection practices and fair relations to collectors.

- The collectors to be interviewed shall be selected by the auditor, the minimum number of interviews in each collection area is specified in chapter 4.1. The selection shall consider collected species, experience in collection, collectors with many "helpers" (subcontracted collectors), age and gender and shall ensure a fair representation of collectors.
- Identity of interviewed collectors should not be revealed to management, interviews are confidential. If the collection company's field advisor accompanies the auditor during the visit of the collection area and hence also during the collectors interviews, the auditor should aim to conduct at least some of the interviews without the advisor being present, and if this appears to lead to different or more critical information to being revealed, all further interviews must be done without the advisor being present.
- During the interviews the auditor shall seek to create an atmosphere of trust and place himself / herself at the same level as the interviewed collectors.
- Issues to address in collector interviews:
 - collection methods, collection areas, collection frequency and period, collected quantities, changes in plant populations over past years, training in sustainability issues, post-collection activities/processing before selling products to collection company.
 - income from collection and prices, time needed for collection, collectors' organization activities and use of FairWild Premium, safety hazards in collection, children in collection, subcontracted workers/collectors?

5.5 Audit of the Processing & Storage Units with Worker Interviews

The on-site tour of facilities is necessary to verify health and safety aspects, the situation of the workforce and workers' wellbeing as well as the traceability of the products.

- Check of processing and storage documentation and other product flow data. Check of labelling of storage areas and products in case the same product is handled in different qualities (FairWild and non-FairWild products)
- Verification of safe working conditions:
 - Emergency procedures, exits, fire extinguishers unobstructed. First aid kits.
 - Protection of workers (personal protection equipment like ear plugs, gloves, steel-capped shoes, protective clothing, eye protection).
 - Staff trainings and awareness of safety aspects. Accident registers.
- Workers interviews are key in verifying fair working conditions.
 - Workers shall be selected by the auditor from a variety of units (e.g. purchase centres, processing unit, warehouse) with a bias on higher risk operational fields or identified weak performance from other verification findings. The selection shall consider shift patterns, worker type, age and gender and shall ensure a fair representation of workers. The interviews shall include a workers' representative if present. Identity of interviewed workers is not revealed to management, interviews are confidential and without any management or supervisory staff being present.
 - During the interviews the auditor shall seek to create an atmosphere of trust and place himself or herself at the same level as the interviewed workers. For the interviews an area shall be chosen where the workers feel comfortable.
 - Issues to address in interviews with workers: working hours and overtime, discrimination, disciplinary practices, health & safety problems, internal communication and worker representation /dialogue with management, work satisfaction, wages and benefits.

5.6 Finalising the On-site Audit

The auditor compiles the FairWild audit report(s) and documentation of findings.

First, he/she completes the overview assessment of target species in the audit report. Based on this preliminary assessment, only species that are adequately managed and documented according to FairWild requirements are proposed for product certification. The following detailed rating of control points is done with regard to the pre-selected target species proposed for certification. Additional comments are added on what information or further management procedures are needed for future certification of also those species not yet proposed for certification.

Each control point (performance indicator) is rated using the following scale:

0 = Poor performance / not compliant

1 = Not yet sufficient, but already positive developments towards meeting the FairWild requirements

- 2 = The norm for sustainable collection for each indicator / control point; adequately meeting the FairWild criterion
- 3 = Excellent performance: higher than norm requirements
- M = Indicates a “MINIMUM REQUIREMENT”, i.e. this requirement must always be fulfilled for certification. Some requirements only become Minimum in Years 2 or 3 of certification.

Any not applicable control points are indicated as n.a. and do not count towards the respective totals of applicable Total Norm Points and applicable Maximum (MAX) number of points.

In the Summary Assessment document the rating is summarised to verify the operation's total score and whether the achieved score meets the certification requirements. All necessary pre-conditions for certification or conditions for continued certification are listed.

A final discussion is held with the managers and other company representatives to confirm the overall findings of the audit and the rating given. However, in cases where critically important information has been revealed in confidential worker or collector interviews, the auditor can decide not to disclose the complete audit report and all findings in detail at this time. Necessary improvements to correct fields of non-compliance are discussed. The operator is informed on additional documents or information to be handed in.

The FairWild audit report is signed by the auditor and by the operator to confirm information is correct.

6 FAIRWILD CERTIFICATION

6.1 Evaluation; Finalising the Rating

After the audit the auditors complete the electronic audit report, together with additional documentation collected during or after the audit. The audit report is sent to the CB.

The CB evaluates the audit report and verifies that all procedures have been performed as required and that documentation is complete and sufficient. If necessary the evaluator or certification officer clarifies open questions with the auditor or the operator prior to finalising the rating and assessment. If necessary, conditions and sanctions can be imposed in addition to the measures already agreed between the auditor and the operator.

- If Minimum requirements are not fulfilled, a pre-condition is imposed. Certification can only be granted once the operation confirms the implementation of the indicated corrective measure.
- Conditions for continued certification will be imposed for all performance indicators with rating of 0 i.e. “not compliant”, and for all Minimum requirements which will become applicable in the coming year.

After finalizing the evaluation, the documents are submitted for the final certification decision.

6.2 Certification

Certification Decision

Certification is the final assessment and approval of the evaluation results with regard to an operation's compliance with the FairWild certification requirements.

As a guideline for certification, an operator:

- must fulfill all applicable MINIMUM requirements (either reach 1 or 2 rating, whatever the MINIMUM level is in respective year) AND
- Reach the minimum number of applicable Total Norm. The Total Norm Points is the sum that would be reached if the operator fulfils the norm (rating 2) in every control point that applies to the operation.

Year of Certification	Minimum percentage of applicable TNP
1	60%
2	70%
3	80%
4	90%
From Year 5 onwards	100%

In case of complex or unclear findings the final decision is made by a certification committee established by the CB, with clarifications sought from FairWild Foundation as necessary.

First Certification

Possible results of evaluation are:

- The collection operation fully complies with all requirements => the FairWild Certificate and audit report are issued.
- The collection operation complies with all Minimum requirements but there are some points that must be improved within a given timeline => the FairWild Certificate is issued, together with indication of corrective measures.
- The collection operation does not yet comply with all Minimum requirements => the company receives a list of corrective measures but no certificate. The company has the chance to still receive the FairWild Certificate by implementing the suggested corrective measures.
- Evaluation results show that certification of the targeted plants is not at all possible => the company receives the results of evaluation, but certification is not possible. In such a case, the FairWild Foundation may propose measures, including field activities, which the collection operation may undertake or promote to improve the potential for FairWild certification.

Positive Certification Decision

If the activities are found to be in compliance with the FairWild Standard requirements certification will be granted. There may be preconditions for continued certification

indicated with timelines for corrective action. Recommendations may be included for the improvement of the operator's performance. If data and management procedures are not sufficient for all of the originally proposed target species, only the qualifying target species may be certified.

According to the details agreed in the certification contract, the operator and/or mandator receives a copy of the certification notification from the CB, together with the complete final audit report, the summary assessment, and the FairWild certificate valid for a minimum of one year and three months. The invoice for the audit is also issued.

Relevant documents are also sent to the FairWild Foundation. Usual practice would be that the audit report, summary assessment and certificate are sent, along with the updated operator profile.

On receipt of the certificate, the certified operation may begin to trade ingredients as FairWild-certified. Sales can include ingredients harvested in the collection season in which the audit took place, from species and sites included within the scope of the certificate.

Procedures in cases where certification cannot be granted

In case the operator is not able to comply with the minimum requirements, a notification of non-compliance will be issued together with an indication of necessary areas of improvement.

The CB must then be informed of preferred options, such as scheduling a follow-up audit at a time at which compliance can be ensured, or e.g. withdrawing the application for certification and choosing to receive only a performance evaluation confirmation and the performance evaluation report. The operator can also submit written proof to rebut the rating (see section 7).

In critical cases, the CB may find it necessary not to reveal the full audit findings to the operator in order to protect e.g. workers who have given sensitive, critical information. In this case, the CB will prepare a justification and summary of findings in order to allow the operator to react to the non-compliances but without revealing any details that could allow the operator to identify the source of critical information. In this case, the CB will submit the complete audit report and related evaluation documents to the FairWild Foundation who can crosscheck the audit findings and the resulting rating.

Procedures in Case of Re-Certification

Positive Certification Decision

If the audit demonstrates that the minimum requirements are still fulfilled, the operator receives an updated certificate, the certification notification, summary assessment and audit report(s).

Procedures in Case Certification Cannot be Granted

If the operation has been certified before and requires continuation of certification, but the minimum certification requirements are no longer fulfilled, the operator is informed in a letter of non-conformity to take appropriate corrective measures. If correction of the non-conformity is not possible or correction of non-conformity is not completed within the prescribed time, the operation will be notified of the withdrawal of certification for a certain time (suspension) or for good (withdrawal). Depending of the severity of the violation, suspension of certification may be with immediate effect.

If the certification is suspended the operator is informed in writing that they are no longer to make any reference to FairWild certification on any product labels or PR material and to inform its clients accordingly. The suspension / the withdrawal of certification are also be indicated on FairWild website. Suspended operations can submit proof of corrected non-compliances and, with or without an additional audit depending on the case, certification can be reinstated. If compliance is not reinstated within a maximum of 12 months, the certification is withdrawn.

In certain cases of minor shortcomings, the CB may rule that the certification is only suspended without any effect on marketing activities for a maximum of 6 months, until verification of the correction of non-compliances and following certification. In this case the operator may market produce as certified, but may be required to inform all trading partners of the suspension and his plans to restore compliance within 6 months.

If certification has not been granted or had to be withdrawn, the operation can request at any time to take up certification procedures again and hence schedule another audit to confirm that it is once more compliant with the certification requirements and can be granted certification. Depending on the time frame between the first audit and the follow-up and the fields of non-compliance, the CB can decide to focus the second audit on selected issues only.

6.3 Continuation of Certification

Communication

A certified operator must notify any substantial change in the activities or in the measures taken to ensure compliance with the FairWild Standard by submitting an updated version of the basic data questionnaire. This includes information on new collection sites or products, major changes in labour policies, a new processing facility, etc. All these activities need to be approved / audited prior to considering them part of the certified operation. Any new FairWild target plants need to be categorised according to the risk classification of the FairWild Foundation and sustainability of collection must be confirmed in the next complete audit before they can be certified.

For small changes it is sufficient to highlight them in the annual updating of the basic questionnaire before the audit.

Per contract, the operator is obliged to notify the CB if there is any knowledge or suspicion of any major breach of the social criteria of the FairWild Standard, which

may jeopardize the continuation of certification. In such case the operator describes the problem and suggests corrective measures. Depending on the severity, the CB will decide whether certification will be suspended for a certain period or must be fully withdrawn until e.g. another audit confirms compliance again.

As per the certification contract, a company is free to cancel the certification contract by giving sufficient notice in writing as indicated in the terms of the contract.

If the operator decides to withdraw from the FairWild scheme, the CB must be notified of the decision not to schedule an audit for the coming harvest season. Following notification, only ingredients of the past harvest season (in which an audit took place) may be traded as FairWild-certified, until the expiration date of the certificate. Exit procedures will be agreed with the CB in consultation with FairWild Foundation.

Exceptional Withdrawal of Certification

Certification and the right to make claims of certified FairWild certified collection can be withdrawn at once or at a given deadline under any of the following conditions:

- Cancellation of the contract by the operator or the CB if there is evidence that cancellation is based on activities that are not in compliance with the standard.
- Refusal of audit.
- Refusal to provide information.
- Attempted fraud or willingly submitted false statement.
- Evidence that FairWild certification is being misused to cover up unfair and / or unsocial practices.
- The operator has not paid the applicable fees in due time.
- New substantial information gives proof that the wild collection operation is not sustainable. See section 7 for procedures in case this information is obtained from collectors or third parties. In this case, certification will normally only be suspended and the situation verified in the next audit before certification is withdrawn, if necessary.

In all the cases mentioned above the operator will receive a notification and timelines. Immediate cancellations are subject to possible appeal.

7 GRIEVANCE, COMPLAINTS AND APPEALS PROCEDURES

7.1 Grievance Procedures for Collectors, Workers and External Stakeholders

FairWild audits involve a substantial number of collectors' and workers' interviews during the audit. All workers and collectors are invited to provide confidential comments at any point during the audit. Great care is taken to ensure that the identity of the interviewed workers or collectors is not exposed by any information on findings presented to management.

In the event of receiving information of a certified operation's non-compliance with the FairWild Standard from collectors, workers or external stakeholders, the CB will take appropriate measures to investigate the matter:

- Minor allegations (raised only singularly, without substantial information or data and / or contradicted by audit findings) are briefly investigated further and are considered for the next regular audit during which they are followed up and cross verified.
- Major allegations (raised by several stakeholders, collectors or workers OR not substantially contradicted by audit findings and concerning Minimum certification requirements) are always followed up in detail, with all investigations and findings fully documented.

If workers, collectors or external stakeholders with insights into a certified operation's performance, contact the FairWild CB at other times, the information provided will be duly considered and followed up according to a risk based approach. The informant's identity is kept strictly anonymous in external communication to the certified operation.

7.2 Complaints and Appeals

Complaints and appeals procedures are regulated in the contract between the operator and the FairWild CB. In case of non-agreement, the FairWild Foundation will be contacted for arbitration.

8 TRADING AND LABELLING REQUIREMENTS FOR WILD COLLECTION OPERATIONS

The FairWild Trading Rules lay out the requirements for trading, processing and marketing of FairWild certified raw materials, semi-finished and finished products in retail packages. They are based on the general principle that FairWild certified products require physical traceability and separation of FairWild ingredients throughout the whole supply chain until blended in the finished product.

The FairWild Labelling Rules regulate the use of the FAIRWILD® word and design mark as well as other references to the FairWild quality of products.

Types of operator in the chain of custody for certified ingredients are outlined in the FairWild Trading Rules. Depending on their activities, one and the same legal entity might be a Certified Collection Operation and a Registered Processor and Trader or Licensee at the same time. Wild collection operations should review the Trading and Labelling Rules to determine their applicability.

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