PRO01 – General Requirements and Obligations for Qualified Certification Bodies

01/09/2016

Union for Ethical BioTrade

THE UNION FOR ETHICAL BIOTRADE

The Union for Ethical BioTrade (UEBT) is a non-profit association that promotes sourcing with respect. We support and verify companies’ commitments to innovation and sourcing that contribute to a world in which people and biodiversity thrive.
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1. Scope

UEBT works with Certification Bodies that are accredited under ISO 17065 and/or ISO 17021 and that are therefore deemed to correctly apply these international standards to their operations.

This document applies to prospective and approved certification bodies (CB).

It details the requirements for qualification as an approved CB, the ways of working for approved Certification Bodies and the obligations qualified Certification Bodies shall follow and comply with.

2. Normative References

ISO/IEC 17000:2004, Conformity assessment — Vocabulary and general principles


ISO/IEC 17021:2011 – Conformity assessment — Requirements for bodies providing audit and certification of management systems

3. UEBT internal References

The following referenced documents are essential for the application of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

UEBT STD01 – Ethical BioTrade Standard

UEBT GOV25 – Membership Conditions and Obligations for Trading Members

UEBT PRO10 – Membership Application Process for Trading Members

UEBT PRO24 – Independent Verification of Trading Members

UEBT PRO25 – Ethical BioTrade Work-Plans

UEBT ADM02 – Attestation of Conformity with Minimum Indicators

UEBT ADM03 – Audit Report Template

UEBT ADM06 – Application Form for Trading Members

UEBT ADM16 – Indicative List of Documents for Audit

UEBT ADM17 – Ingredient Portfolio Assessment

UEBT ADM20 – UEBT Sampling Methodology

UEBT documents can be received upon request to the UEBT Secretariat (see Contact information section at the end of the document).
4. Terms and Definitions

The terms and definitions provided in ISO/IEC 17000:2004, Conformity assessment, vocabulary and general principles apply, unless otherwise specified in the text or defined below.

In addition, the following definitions are applicable in this document.

**Auditor**: A person who performs audits.

**Audit**: Systematic, documented process for obtaining records, statements of fact or other relevant information and assessing them objectively to determine the extent to which specified requirements are fulfilled.

**Biodiversity management system**: a set of policies, procedures, and practices designed to implement the Ethical BioTrade Standard and UEBT Membership Obligations at the level of the member organisation and its natural ingredient supply chains. (UEBT, 2012)

**Ethical BioTrade Sourcing Targets**: specific targets aiming to gradually align the biodiversity sourcing practices of a UEBT Trading Member with the UEBT Membership Conditions and Obligations. (UEBT, 2012)

**First-party audit**: audit carried out by an organisation of its own system.

**Independent verification**: External verification, also called third-party audit, carried out by trained auditor(s) of a UEBT qualified Certification Body.

**Natural ingredient**: for the purpose of the UEBT Membership Conditions and Obligations, ingredient that comes directly from plants or animals or that includes plant or animal inputs, even if these inputs have been significantly processed.

**Organisation**: entity responsible for the gradual application of the Ethical BioTrade standard through its management system and supply chains.

**Second-party audit**: audit carried out by a client of the organisation.

**Stakeholder**: person or organisation that can either be influenced or influence a project or initiative.

**Third party**: person or body that is recognized as being independent of the parties involved, as concerns the issue in question.

*Note: Parties involved are usually supplier (“first party”) and purchaser (“second party”) interests. (ISO/IEC Guide 2:1996)*

**Third party audit**: referred to Independent verification.

**UEBT Trading Member**: member that is directly involved in the supply chain of Ethical BioTrade goods and services (e.g. producer/collector organizations, processing companies, traders, manufacturing companies, brands, consortia of trading companies, research institutions, etc.).

**UEBT Coordinator**: Is the CB staff member who is responsible for the administrative management of the CB’s account in the UEBT program. The UEBT Coordinator can also be an auditor provided they comply with the requirements of an auditor described in §5.3

**Certification Body**: Legal or administrative entity that has the specific tasks to operate independent certification and/or verification (adapted from ISO/IEC Guide 2:1996) that is duly qualified by UEBT.
5. Requirements for becoming Qualified Certification Bodies

5.1. General requirements

5.1.1 A Certification Body that seeks for UEBT qualification shall be accredited under ISO/IEC 17065 and/or ISO/IEC 17021. The Certification Body is also strongly recommended to implement ISO 19011 (Guidelines for quality and/or environmental management systems auditing).

5.1.2 In addition to 5.1.1, a Certification Body that seeks UEBT qualification shall already be involved in other social and environmental schemes such as UTZ Certified, FLO, ESR (Ecocert), IBD EcoSocial, FSC, Sustainable Agriculture Network, ISO 9000, ISO 14000, etc.

5.1.3 A Certification Body that seeks UEBT qualification shall sign a Letter of Agreement with UEBT (see ADM01 - Generic Certification Body Agreement).

Note 1: Under specific circumstances, to allow a better understanding of the UEBT verification system, a Certification Body and the UEBT Secretariat may agree to undertake an independent verification before the agreement has been signed. This needs to be specifically approved by the UEBT Secretariat.

5.1.4 Auditor(s) selected by the Certification Body to work under the UEBT system shall have at least 3 years of experience in auditing. UEBT prefers to work with auditors that have official and proven experiences in auditing management systems.

5.2 Structural Requirements

5.2.1 As stipulated in ISO 17021, qualified Certification Bodies shall adequately safeguard the impartiality of their activities.

5.2.2 Qualified Certification Bodies shall have a structure (in relation to their size) that ensures the fulfillment of the following functions:
1. managing the UEBT verification/certification system;
2. conducting audits under the UEBT verification/certification system;
3. reporting on audits as required by the UEBT verification/certification system.

Note 2: Depending on the size of the Certification Body and the volume of the UEBT-related business; the roles of Certification Coordinator(s) and the auditor(s) can be fulfilled by one person or assigned to a team of people. This decision is up to the Certification Body.

5.2.3 The management of the UEBT Verification/Certification System within a qualified Certification Body shall:
1. supervise the implementation of the UEBT Verification/Certification System within the Certification Body, e.g., getting the necessary information from potential clients and the UEBT Secretariat, developing quotes, developing contracts with clients, ensuring the quality of independent verifications and reports, including respecting deadlines for delivery, etc.;
2. always interact with the UEBT Secretariat, particularly when an independent verification is scheduled;
3. ensure that the qualified auditors are up-to-date with their training, as required by §5.3.
5.3 Human resource requirements

5.3.1 People filling in the different functions (UEBT Coordinator\(^1\) and the Auditor) within a qualified Certification Body shall:

1. be fully trained auditors in the social and environmental scheme(s) (see §5.1.2) handled by the Certification Body;
2. have official and proven experiences in auditing management systems (see §5.1.4)
3. have successfully completed the mandatory training modules provided by the UEBT Secretariat (see table 2)

5.3.2 UEBT Coordinators shall be responsible for:

1. the administrative and commercial proposals and follow-up regarding its client (i.e. UEBT Trading Member or applicant Trading Member),
2. the quality of audit and the report
   - audit plan properly implemented
   - consistency and quality of the audit report
   - consistency of the UEBT work plan approved by the auditor
3. ensuring that the auditors’ deliverables have been received on time by UEBT member and the UEBT Secretariat.
4. the recommendation of the certification (ref. §3.6.1 UEBT Certification Protocol)
5. training of auditors
6. updating UEBT secretariat on status of auditors (new and those who are no longer auditors)
7. providing UEBT secretariat schedule for audits for the coming year
8. ensuring the CB auditors do not have any conflict of interest with the UEBT member (see § 6.3.1).

5.3.3 The Auditors shall be responsible for:

1. developing and sending the audit plan
2. carrying out the audit
3. writing the audit reports
4. approving UEBT work plan
5. sending on time all the deliverables to the UEBT Members and UEBT Secretariat

*Note 3: The qualified Certification Body may work with an audit team. However, this is not a requirement from UEBT. This is up to the qualified Certification Body. In case of working with a team, the Certification Body shall indicate who is the team lead.*

5.3.4 People filling in these functions within the qualified Certification Body shall have the knowledge and skills described in Table 1, in addition to the ISO 17021 and/or 17065 requirements.

\(^1\) UEBT coordinators is synonymous to UEBT Coordinators indicated in the IMS Protocol
### Table 1: UEBT Coordinator and Auditor qualifications and competencies

*Note: X+ indicates a need for deeper knowledge and skills, more experience, lead courses*

<table>
<thead>
<tr>
<th>Knowledge &amp; skills</th>
<th>Functions</th>
<th>UEBT Coordinator</th>
<th>Auditor</th>
<th>Competencies</th>
<th>Qualifications &amp; Evidences</th>
</tr>
</thead>
<tbody>
<tr>
<td>Auditing Experience</td>
<td></td>
<td>X+</td>
<td>X</td>
<td>Experiences in auditing social and environmental standard schemes².</td>
<td>CV, certificate, attestation, audit logs etc.</td>
</tr>
</tbody>
</table>
| UEBT Membership process and procedures | | X+ | X+ | • Experience in Management systems³ (by training or working experience)  
• Demonstrate an understanding of the UEBT Procedures⁴ (see training modules Table 2) | • CV, Certificate attestation  
• Passed the corresponding training  
• Shows continuous understanding while in contact with the UEBT Secretariat. |
| UEBT ESS Certification Protocol | | X+ | X+ | • Demonstrate an understanding of the UEBT ESS Certification protocol (see training modules Table 2)  
• Ability to correctly interview stakeholders and the client respecting the individual and cultural situations | • Passed the corresponding training  
• Correctly applies the corresponding requirements;  
• Shows correct use of different tools through Work experience, audit reports, etc. |
| UEBT IMS certification protocol | | X+ | X+ | • Demonstrate an understanding of the UEBT IMS Certification audit protocol (see training modules Table 2)  
• Ability to correctly interview stakeholders and the client respecting the individual and cultural situations | • Passed the corresponding training  
• Correctly applies the corresponding requirements;  
• Shows correct use of different tools through Work experience, audit reports, etc. |

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² Social and Environmental standard schemes include but not limited to: UTZ, Rainforest Alliance, Global gap, Organic, Euro gap, Trustea, Fair for Life. Fair trade, Fair Life.

³ ISO 9000/9001; SA 8000; ISO 14001; ISO 22000

⁴ The CB shall ask to UEBT for the updated procedures (e.g. GOV 25; PRO24; PRO 12; PRO 11, etc.)
| Ethical BioTrade Standard | X+ | X+ | Demonstrate an understanding of the Ethical BioTrade Standard (see training modules in Table 2) | • Passed the corresponding training  
• Shows correct interpretation of the standard through work experience, audit reports, etc. |
|--------------------------|----|----|----------------------------------|-----------------------------------------------|
| UEBT tools and templates | X | X | • Demonstrate an understanding of all tools developed by the UEBT Secretariat whether they are aimed at Trading Members or Certification Bodies  
• A correct use of the different UEBT tools (Ingredient Portfolio Assessment, sampling methodology, etc.)  
• A correct use of the UEBT templates: audit report for membership and certification, other. (see training modules in Table 2) | • Passed the corresponding training  
• Shows correct interpretation of the tools through work experience, audit reports, etc. |
| Client business sector and operations | X | X+ | Demonstrate an understanding of the business sector in which the UEBT Trading Member works | • Work experiences in this sector |
| Language skills | X | X+ | Demonstrate the language appropriate to all levels within the organization and its supply chains (by the auditor or through a translator hired by the CB) | • CV, work experience, certificates, etc. |
| Writing skills | X | X+ | Demonstrate skills to write in a clear and precise way | Work experience, certificates, etc. |
| Communication & interview skill | X+ | X+ | Demonstrate skills to communicate in a clear and emphatic way at the different levels to the Organization and supply chains. | • Work experiences; |
5.3.5 UEBT reserves the right to ask from the CB the CV, and proof of compliance and qualifications with the requirements described 5.3.4 of the auditors for purposes of quality control.

Table 2: Training Modules for UEBT audits (✓ is needed)

<table>
<thead>
<tr>
<th>Training module</th>
<th>Membership audit</th>
<th>IMS certification audit</th>
<th>ESS certification audit</th>
</tr>
</thead>
<tbody>
<tr>
<td>UEBT Ethical Bio Trade Standard (STD01)</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Membership obligations and conditions</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>ESS certification protocol</td>
<td></td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>- Ethical Sourcing Commitment</td>
<td>✓</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>- Ethical Sourcing System</td>
<td>✓</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>- Risk Assessment</td>
<td>✓</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>- Prioritization of Supply Chains</td>
<td>✓</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>- Ethical BioTrade promotion</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>- UEBT Work Plan</td>
<td>✓</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>- UEBT Claim and Label use</td>
<td></td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>UEBT IMS Certification Protocol</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- IMS Setup</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>- Field Checklist</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>- Certification Checklist</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>- Stepwise approach</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>- External Verification System</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>- UEBT Biodiversity Action Plan</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>UEBT Sampling Methodology</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>UEBT Scoring system</td>
<td></td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>ABS</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>UEBT entry indicators</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>
6. Obligations for qualified Certification Bodies

6.1 General obligations

6.1.1 Qualified Certification Bodies shall remain compliant with the above requirements (§4).

6.1.2 Qualified Certification Bodies shall demonstrate commercial behaviour in line with the spirit of Ethical BioTrade.

6.1.3 The qualified Certification Body shall apply PRO24 – Independent Verification of Trading Members while auditing a UEBT Trading Member or Approved Candidate (hereafter organisation) or the applicable UEBT certification protocol when conducting certification audits.

6.1.4 The qualified Certification Body is only involved in the independent verification process and recommends the organisation to membership or certification. The membership/certification decision mechanism is then carried out by the UEBT Secretariat and the relevant UEBT Committees.

6.1.5 If there is any change in the team working on the UEBT verification/certification system, the qualified certification Body shall inform the UEBT Secretariat and ensure the new people are trained as described under §5.3 of the present document.

6.1.6 The qualified Certification Body shall have a system to keep updated on policy and procedures that are periodically revised by UEBT.

6.2 Independent verification preparation obligations

6.2.1 Before undertaking any formal independent verification or related activity for an organisation, the qualified Certification Body shall:

1. first contact the UEBT Secretariat to inform them about the upcoming independent verification; I.E. 1 month before the actual audit or immediately they have confirmation of audit by the client;

2. seek up-to-date information, and in case of doubt ask support from the UEBT Secretariat;

3. inquire with the UEBT Secretariat whether:

   - the organisation has been granted the status of Approved Candidate or is already a UEBT Trading member;
   - UEBT requests the qualified Certification Body to pay special attention on certain aspects of the Ethical BioTrade Standard;
   - UEBT has background information on the organisation that it can share with the qualified Certification Body to help it prepare the independent verification.

6.2.2 The qualified Certification Body shall ensure that its chosen auditor is well trained under the UEBT verification system and Ethical Bio Trade Standard.

6.2.3 The CB shall only use auditors that have been registered and approved by UEBT.

6.2.4 If the organisation has worked with another qualified Certification Body in its previous UEBT independent verification, the new selected qualified Certification Body shall communicate with the UEBT Secretariat and the previous qualified Certification Body to ensure that information is obtained and outstanding issues with the organisation are considered.
6.2.5 Before making a technical and financial proposition to the organisation, the qualified Certification Body shall have sufficient knowledge to ensure its proposal covers the necessary elements of the future independent verification, including at least the following elements:
1. the Ethical BioTrade Standard;
2. the UEBT verification system and its procedures; and
3. the organisation business operations in relation to natural ingredients sourcing practices.

6.2.6 The qualified Certification Body shall ensure that its quote takes into consideration the audit requirements stipulated in the relevant UEBT verification/certification protocols.

6.2.7 The quote of the qualified Certification Body shall contain at least the following items, in addition to the usual items of the Certification Body’s procedure:
1. Details of the independent verification/certification scope
2. Details of the audit protocol, e.g. documentation review, interviews, field visit, where appropriate, etc.;
3. Reporting obligations and tentative timelines;
4. Fee schedule;
5. Next contract agreement steps, etc.

6.2.8 The quote shall specify the audit costs (including number of days and daily fees), broken down in the categories; preparation, independent verification, reporting, work plan approval, transport & accommodation (see Annex 1 “guidance to calculate audit time for UEBT Membership program”).

6.2.9 If a team of auditors is involved in the independent verification, the Certification Body shall provide the relevant details in the quote in terms of justification (e.g. use of experts, internal Verification Body procedure, use of translators, etc.) and in the fee schedule for the item “independent verification”.

6.2.10 The qualified Certification Body shall ensure consistency in its quotes among its UEBT clients (i.e. UEBT Trading Members).

6.2.11 When the Certification Body uses translators during the assessment, the translators shall be independent of the audited organisation. If this is not feasible, the auditor shall include the name and affiliation of the translators with the audited organisation in the audit report.

6.2.12 The auditor shall be correctly prepared to undertake the audit.

This preparation phase should include, in addition to the usual work detailed in ISO 17021 or ISO 17065, the following:
1. understanding of the organisation business operations in relation to natural ingredients sourcing practices;
2. understanding and use of the independent verification work as detailed in the applicable audit protocol
3. Preparation of a Draft list of people that should attend the audit or part of it (see § 5.2.13);
4. preparation of a Draft list of potential documents to be asked and reviewed during this assessment

6.2.13 The auditor shall determine audit time according to ISO17021 or ISO17065 and its experience with the UEBT verification system.
6.2.14 The auditor shall make sure that the relevant persons from the organisation are available for the audit.

6.2.15 The auditor shall share with the organisation an audit plan at least one (1) week before the audit.

The audit plan should be reviewed and accepted by the organisation. The audit plan should facilitate scheduling and coordination of the audit activities. The amount of detail provided in the audit plan should reflect the scope and complexity of the audit. The audit plan should cover the following:

1. the audit objectives (Membership, Subsequent independent verification, (Re-)Certification etc.);
2. the audit criteria and any reference documents (e.g. STD01 – Ethical BioTrade Standard, Applicable checklists);
3. the audit scope, including identification of the organisational and functional units and processes to be audited;
4. the dates and places where the on-site audit activities are to be conducted;
5. the expected persons to attend the audit (R&D department, Quality department, Purchase, etc.);
6. the expected time and duration of on-site audit activities, including meetings with the organisation’s management and audit team meetings;
7. the roles and responsibilities of the audit team members and accompanying persons, when appropriate;
8. the allocation of appropriate resources to critical areas of the audit, when relevant.

The audit plan should also cover the following, as appropriate:

1. identification of the organisation’s representative for the audit;
2. the working and reporting language of the audit where this is different from the language of the auditor and/or the organisation;
3. the audit report topics;
4. logistic arrangements (travel, on-site facilities, etc.);
5. matters related to confidentiality.

6.2.16 The auditor shall ensure access to relevant and reliable information to do the work correctly and in a timely manner.

6.3 Contract agreement requirements

6.3.1 A contract shall be signed between the organisation and the qualified Certification Body that contains at a minimum the elements listed below:

1. A clause of confidentiality that all participants in the independent verification process shall abide to and sign, including lead auditor, auditors, observers, translators and any person in the Certification Body who will have access to the reports.
2. Clauses that reflect the independent verification process and timelines, and the Certification Body reporting obligations.
3. Any additional clauses that are relevant for this process, e.g. translations needs etc.

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5 Source: ISO/IEC 19011:2011 - Guidelines for quality and/or environmental management systems auditing
6.4 Impartiality

The CBs shall adequately safeguard the impartiality of their activities. They must ensure that their personnel do not carry out any activity that may affect their impartiality, such as carrying out consultancy activities or pre-audits for clients on whom they also perform UEBT audits. They must also ensure that the personnel have not worked for the organization i.e. UEBT member at which they are to carry out auditing activities in the past two years preceding the task.

The auditors including translators, shall complete a record stating any potential or existing conflict of interest including property, financial, and family ties with the UEBT member/ Certificate holder.

When a conflict of interest exists, the respective individual shall not be involved in the related audit.

6.5 Integrity

The CBs personnel are expected to fulfill their tasks with the highest ethical standards. Any situation that may compromise or influence this should be reported to the UEBT Coordinator who will in turn inform UEBT secretariat.

To maintain professional integrity, CBs must avoid that one auditor conducts more than three subsequent audits of the same organization in a row. A system for rotation of auditors should be in place.

6.6 Confidentiality

The CB and auditors are required to respect and keep confidential all documents, procedures and policies of the UEBT members unless otherwise permitted to share with a written consent from the UEBT member.

UEBT shall treat information received from Certification Bodies in fulfillment of these requirements as confidential, unless it concerns information that is already public, is contained in public documents or is clearly highlighted for public distribution.

All CB personnel including translators shall sign a non-disclosure agreement with the CB that bounds them to keep confidential all

6.7 Independent verification obligations

6.7.1 The auditor shall conduct an opening meeting, of which attendance shall be recorded, shall be held with the organisation’s management and the relevant persons to properly conduct the UEBT independent verification. The opening meeting shall include, in addition to the requirements of ISO17021 and/or ISO 17065, the following:
1. briefly introduce the UEBT and the Ethical BioTrade Standard to make sure all people have the same level of minimum information about the ongoing process;
2. introduce its audit team, when relevant, with the role of each ones;
3. approval of the audit plan.

6.7.2 The auditor shall conduct the independent verification in its integrality.

6.7.3 The independent verification shall take place through observation of activities and processes (where relevant), documentation review and interviews with, at least, the people of the organisation involved in UEBT membership, natural ingredients’ sourcing and those linked to items addressed by the Ethical BioTrade Standard.

6.7.4 The auditor shall apply the UEBT scoring system as required by the relevant protocols.
6.7.5 The auditor shall conduct the closing meeting, for which attendance shall be recorded, and which shall be held with the organization’s management and the relevant persons who participated in the UEBT independent verification.

6.8 Reporting obligations

6.8.1 In case of a membership audit: No later than seven (7) days after the end of the independent verification, the qualified Certification Body shall submit to the UEBT Secretariat, with copy to the organisation, the Attestation of Conformity with the Entry Indicators included in the Audit Report. (ADM03 - Audit Report Template; PRO24 – Independent Verification of Trading Members.

6.8.2 One (1) month after the independent verification, the qualified certification Body shall send a Draft audit report to the UEBT Secretariat. The UEBT Secretariat reviews every audit report in the framework of continuous improvement of its auditors pool while receiving the Draft report. Without interfering in the independent assessment judgment of the auditor, there might be feedback from the UEBT Secretariat to the qualified Certification Body regarding reporting format and the interpretation of the Ethical BioTrade Standard.

6.8.3 Two (2) months after the independent Verification the qualified Certification Body shall send to the (Provisional) Trading Member the final audit report with copy to the UEBT Secretariat,

6.8.4 In case of a membership audit: The auditor shall review and approve the Ethical BioTrade Work-Plan developed by the organisation according to PRO25 – Ethical BioTrade Work-Plan. Its approval should take into consideration the feasibility of the Work-Plan in terms of timelines and budget wise. As well, whether the Ethical BioTrade Work-Plan responds to the weaknesses identified in the audit report to ensure progress.

6.8.5 Four (4) months after the independent Verification, the qualified Certification Body shall submit to the UEBT Secretariat and the organisation:

1. the final full and public version of the audit report according to the UEBT audit report template (ADM03 – Audit Report Template, PRO24 – Independent Verification/Certification of Trading Members)
2. the approved 3-year Ethical BioTrade Work-Plan (in case of membership audit)
3. the letter for approval of the Work-Plan (in case of membership audit)

7. UEBT Oversight

UEBT monitors the work of the CBs in 3 ways:

7.1 Desktop review of audit reports

The UEBT Coordinator of the CB has the responsibility of reviewing all audit reports generated by the auditors. The Coordinator will then fill in an audit review checklist that will be shared with UEBT for all the audits.

The aim of desktop review is to verify the consistency and quality of the audit report. For this purpose, UEBT secretariat (or a qualified professional hired by UEBT) through sample-based criteria, will review the final audit and membership reports and/or UEBT work plan approval by the CB. A desktop review report shall be shared with the CB with the finding and recommendations with aim to the CB implement properly corrective actions. As result of this review UEBT can take the decision to carry out a shadow audit or an unannounced audit.
7.2 Shadow Audits

This is a scheduled audit known by both the CB and UEBT prior to the audit date.

The aim of a shadow audit is to verify the non-compliances identified after a desktop review of audit reports.

UEBT will accompany the CB auditors for the shadow audit. During the shadow audit, the UEBT staff shall observe the CB auditor conducting the audit and prepare a written evaluation of the auditor.

The CB UEBT Coordinator is expected to share schedule of audits every year and based on sampling, UEBT will inform which audits they will shadow (see table below for the justification).

After the shadow audit, an evaluation reports and other relevant information are prepared by UEBT and shared with the CB.

UEBT will use their own staff or local approved auditors for this kind of audit.

7.3 Unannounced Audits

UEBT may conduct unannounced audit during a normal audit conducted by a CB if there is suspicion of misconduct of the CB, if there is a claim or complaint made by third parties and other stakeholders regarding performance of the CB or ethical implementation of the UEBT standard by the UEBT member. Or any indication that is considered as a risk to the integrity of UEBT. For this, UEBT will inform the CB no more than 24 hours to the audit.

UEBT may also conduct an unannounced audit outside the normal audit conducted by a CB. UEBT will visit the UEBT member with the last report of the auditor and do a spot check to ensure that the report correlates with what is seen on the ground. For this, UEBT will inform the UEBT member no more than 48 hours to the intended date.

UEBT will use their own staff or qualified auditors.

UEBT will define the number of oversight actions and audit to be assessed based on the following criteria, see table below:

<table>
<thead>
<tr>
<th>Type of oversight</th>
<th>IMS audit</th>
<th>ESS audit</th>
<th>Membership audit</th>
</tr>
</thead>
</table>
| Desktop review    | Sample size:  
  - Random sampling (% of total number of audits done by a CB in a year)  
  Sample selection based on either judgemental or discovery sampling  
  - New auditor  
  - Increased scope on UEBT member | Sample size:  
  - Random sampling (% of total number of audits done by a CB in a year)  
  Sample selection based on either judgemental or discovery sampling:  
  - New auditor  
  - Increased scope on UEBT member | Sample size:  
  - Random sampling (% of total number of audits done by a CB in a year)  
  Sample selection based on either judgemental or discovery sampling:  
  - New auditor  
  Increased scope on UEBT member |
| Shadow audit      | Discovery sampling based on Risks such as  
  - New CB | Discovery sampling based on Risks such as  
  - New CB | |

PRO01 – Requirements and Obligations for Qualified Certification Bodies - 2014 15/19
8. Sanctions

8.1 UEBT may issue warnings and reserves the right to suspend a CB from conducting audits based on evidence of breach of contract, inadequate performance of CB personnel or Qualification may be suspended in case of lack of compliance with these requirements and obligations.

8.2 A suspension may be applied after three written warnings have been given for a specific and same case.

8.3 In severe situations, such as cases that lead to a breach of trust or compromise the integrity of the UEBT Certification system, a suspension may be applied without warning.

8.3 Certification Bodies that lose their qualification are taken off from the list of Certification Bodies on the UEBT website and may not undertake any UEBT Independent audits.

8.4 Qualification may be reinstated by the UEBT Secretariat when Certification Bodies regain compliance with these requirements. Certification Bodies have up to six (6) months to regain compliance.

8.4 If, after this timeframe, the Certification Body remains non-compliant, it shall sign a new Letter of Agreement with UEBT and redo the qualification process described in section 4 of this document before undertaking any UEBT independent Verification/Certification.

8.5 The suspended CB may request to be reconsidered for the UEBT Certification system program. The decision on whether the request can be granted, and the required actions are determined on a case-by-case by UEBT.

8.6 The CB can appeal the decision to UEBT

9. CB Approval Procedure

Certification Bodies interested in being qualified by the UEBT should contact the UEBT Secretariat by email at (verification@ethicalbiotrade.org) to request for an application form.

• Through the application form, the CB indicates who the UEBT Coordinator will be and who the auditor(s). This can be the same person(s), provided qualifications in §5.3 are met.
The CB sends the completed application form together with copies of the following to verification@ethicalbiotrade.org

- Valid ISO 17065:2012 accreditation certificate
- Proof of qualifications of the proposed UEBT Coordinator and the auditors

UEBT will send the CB “UEBT-Certification Body Agreement” once it has verified all requirements are met in the application form. This document spells out the obligations for the CB to meet.

The CB signs the agreement and sends it back to UEBT

UEBT will sign the agreement and send it back to the CB accompanied by an official approval statement.

In case of changes to the list of the UEBT Coordinator and the auditors, the CB shall notify UEBT.

10. Use of UEBT logo and communication on UEBT

Any communication on UEBT programme, UEBT certification process and use of UEBT logo on your website, materials etc will be authorised in writing by UEBT Secretariat.

Please contact verification@ethicalbiotrade.org before any communication referring to UEBT and its members is published to approve the content.

11. Annual Reporting

The CB reports on an annual basis to UEBT on the below parameters:

- number of audits done including spot checks performed
- type of audit
- Personnel that conducted the specific audits
- List of Approved auditors and UEBT Coordinator (if there are changes)
- Updated CV of the personnel (if there are changes).

The format of the report shall be requested at verification@ethicalbiotrade.org and sent back before 31st January of the new Calendar year.

Contact

Any enquiry about this procedure of the Union for Ethical BioTrade should be addressed to:

Union for Ethical BioTrade – Secretariat
De Ruyterkade 6
1013 AA Amsterdam
Netherlands

Or via email: info@ethicalbiotrade.org
ANNEX 1. GUIDANCE TO CALCULATE AUDIT TIME FOR UEBT MEMBERSHIP

Membership audit objective

The aim of the Membership audit is to verify the compliance of:
- Membership conditions and obligations
- Functioning of the Ethical Sourcing System (ESS) of the Organization
- Progress made in the prioritized supply chain(s) with the implementation of the Ethical Bio-Trade Standard according to the Trading Member’s target set.

Membership audit components and reference of the time estimated

<table>
<thead>
<tr>
<th>Components</th>
<th>Basic activities</th>
<th>Reference time (days)¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Audit preparation</td>
<td>- review documents (previous audit report, previous, non-compliance, key background of the company) &lt;br&gt;- elaboration of the audit plan</td>
<td>0,5</td>
</tr>
<tr>
<td>2. Audit on-site</td>
<td>- open meeting &lt;br&gt;- documentation review &lt;br&gt;- visit of the facilities &lt;br&gt;- interview with key company’s workers and staff &lt;br&gt;- preparing the conclusion &lt;br&gt;- close meeting</td>
<td>1,0 – 1,5</td>
</tr>
<tr>
<td>3. Reporting</td>
<td>- elaboration and review (if applicable)</td>
<td>1,0</td>
</tr>
<tr>
<td>4. Work Plan review</td>
<td>- review and approval</td>
<td>0,5</td>
</tr>
<tr>
<td>5. Travel time</td>
<td>- depend of each audit (must be estimated and agreed between the CB and the Trading Member)</td>
<td>-</td>
</tr>
</tbody>
</table>

¹ The audit time indicated in this guidance must be used as reference. The audit time must be agreed between the CB and the Trading Members according to the company complexity, type of audit (first audit or following audit) and logistic conditions (e.g. distance and accessibility).
Proposal of an audit plan

The following proposal audit plan includes the schedule, activities, documentation and persons required during the evaluation. The auditor should use this audit plan as reference.

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<tr>
<th>Day 1 – Days (DD/MM/YYYY)</th>
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<td>End of the day (00 - 00)</td>
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