

# RAINFOREST ALLIANCE POLICY:

## Remote Closure of Non- Conformities

*Document SA-P-GA-11*

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*English*

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The Rainforest Alliance is creating a more sustainable world by using social and market forces to protect nature and improve the lives of farmers and forest communities.

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Policy on Remote Closure of Non-Conformities	June 30, 2021	December 31, 2024
<b>Linked to</b>		
SA-S-SD-1 Rainforest Alliance 2020 Sustainable Agriculture Standard, Farm Requirements SA-R-GA-4-V1 Certification Rules SA-S-SD-13 Annex S12: Additional Details on requirements for no-conversion. SA-G-SD-5 Guidance Document D: Geolocation and Risk Maps		
<b>Replaces</b>		
SA-P-GA-11-V1- Policy Remote Closure of Non-Conformities		

<b>Applicable to</b>
Rainforest Alliance Certificate Holders, Globally, All crops.

Policies are binding. Policies complement and/or supersede related rules or requirements for the parties they are applicable to.

*More information*

For more information about the Rainforest Alliance, visit [www.rainforest-alliance.org](http://www.rainforest-alliance.org), contact [info@ra.org](mailto:info@ra.org) or contact the Rainforest Alliance Amsterdam Office, De Ruijterkade 6, 1013AA Amsterdam, The Netherlands.

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## OVERVIEW OF KEY CHANGES

Overview of key adaptations in this document

SA-P-GA-11-V1.1-Policy-Remote-Closure-of-Non-Conformities, published September 10<sup>th</sup>, 2024,

as compared to the previous version

SA-P-GA-11-V1- Policy Remote Closure of Non-Conformities, published June 30<sup>th</sup>, 2021.

Page	Change
p. 02	Change the policy expiration date to 31 Dec 2024.



## Introduction

Rainforest Alliance understands that the 2020 Rainforest Alliance Certification Program includes a number of important innovations that Certificate Holders may need time to implement fully. We are also aware that this may lead to the need for more follow-up audits to check the closure of non-conformities. Therefore, for the sake of efficiency, Rainforest Alliance Certification will allow CBs to perform remote follow-up audits to verify closure of non-conformities (NCs) identified on farms. This policy describes the conditions in which on-site follow-up audits must be performed and when remote follow-up audits are possible.

This policy complements and clarifies articles from 2.3.24 to 2.3.27 in SA-R-GA-4-V1 Certification Rules.

### 1. Glossary

**Remote follow-up audit:** Audit performed remotely by a CB with the objective of verifying closure of NCs detected on a (re)certification or surveillance audit.

**On-site follow-up audit:** Audit performed in person at the premises of the Certificate Holder (CH) or potential CH by a CB with the objective of verifying closure of non-conformities (NCs) detected on a (re)certification or surveillance audit.

### 2. Objectives

- a. Provide CBs with criteria to decide when a remote follow-up audit is possible and when the follow-up audit must be done on-site.
- b. Allowing farm CHs to continue to participate in the Rainforest Alliance 2020 Program by ensuring on-site follow-up audits are only conducted when strictly necessary.

### 3. Policy

#### General Rules on closure of NCs

- 3.1 The CH shall close all NCs in a period of maximum 10 weeks after the last day of the audit (SA-R-GA-4-V1 Certification Rules, section 3.1.37) by implementing the appropriate correction and corrective action plan to prevent recurrence of the NCs (SA-R-GA-4-V1 Certification Rules, section 4.2.10).
- 3.2 For NCs related to labor conditions for which remediation will take longer than the period allowed for closure of NCs (e.g., grievance mechanism and gender equality promotion), the NC may be closed with a corrective action plan (SA-R-GA-4-V1 Certification Rules, section 4.2.10.e.).

#### Remote Follow-Up Audits

- 3.3 For (re-)certification/surveillance audits, closure of nonconformities (NCs) that can be assessed remotely, through document review, virtual observation, and/or interviews with management, may be done through a remote follow-up audit.
- 3.4 To close an NC related to documentation only (e.g., plans or records), the CH shall send evidence to the CB for review.



- 3.5** To close NCs where observation is required to evaluate improvement of conditions, the CH shall submit to the CB recorded videos with a date stamp or live videos as evidence.
- 3.6** To close NCs related to training of workers the CB shall consider detailed training records and/or videos with a date stamp of training sessions as evidence of closure. Remote closure of NCs related to training should also include some verification of the knowledge of workers to demonstrate the training was effective. Please see Table 1 below for examples.

**Table 1:** Example of core requirements that require verification of workers' knowledge (please note that this is not an exhaustive list).

<b>Requirement number</b>	<b>Topic</b>	<b>Aspects that could require on-site verification</b>
5.6.1	Occupational health and safety risks analysis.	Knowledge of workers on Health and safety procedures
5.6.5	Access to safe drinking water in small farms (training program).	Knowledge of group members on portable water treatments and prevention of water contamination.
5.6.10	All tools used by the workers are in good working condition.	Workers using such machines have appropriate knowledge to operate machines safely.
5.6.13	Workshops, storage areas and processing facilities are safe, clean, with sufficient light and ventilation.	Workers are trained on how to use firefighting equipment and spillage of materials.
5.6.15	Workers receive basic training on occupational health, safety and hygiene and related instructions are visible displayed at central locations.	Workers' understanding of these topics. Visible evidence that instructions are displayed at central locations.
5.6.16	Workers who regularly handle hazardous agrochemicals receive a medical examination at least once a year.	Workers' testimony that they have received a medical examination and have access to the results of their medical examinations.

- 3.7** When a remote follow-up audit is used, the CH shall send the CB all the evidence of correction necessary for closing the NCs, within the allowed timeframes (maximum 10 weeks), as described in the SA-R-GA-4-V1 Certification Rules, article no. 2.1.34.
- 3.8** Regardless of the provisions in this policy, Rainforest Alliance reserves the right to request that a specific follow-up audit takes place on-site.



## On site Follow-Up Audits

- 3.9** On-site follow-up audits shall be performed for verification of corrective actions of NCs where the information provided by workers, through confidential interviews, is crucial to verify compliance. Information provided by workers normally confirms or refutes information provided by CHs' management.
- 3.10** Requirements related to working conditions, such as discrimination, overtime, wages, freedom of association and harassment, among others, will usually require an on-site follow-up audit. Table 2 shows a list of requirements that typically require a site visit.
- 3.11** When there is an unresolved complaint, the follow-up audit must take place on-site, at least to verify compliance with the issues related to that complaint.
- 3.12** An on-site follow-up audit is mandatory if any single NC requires verification of compliance through on-site verification. See the list of requirements which could require on-site verification in Table 2 below:

**Table 2.** List of requirements and NCs that could require an on-site follow-up audit to conduct confidential interviews or verify physical improvements (please note that this is not an exhaustive list).

Requirement number	Topic	On-site follow up audit required	Remote follow-up audit allowed
4.6.3 and 4.6.4	Pesticide handlers are trained, wear PPE and bathe, change and wash clothes after application.	When interviews confirmed pesticide handlers do not bathe or change clothes after application.	To check training records and other relevant documentation.
5.1.1	Management commits to assess-and-address child labor, forced labor, discrimination, and workplace violence and harassment. The worker representative(s) is/are selected by workers.	When the NC is related to selection of representatives by workers.	To check documentation of management commitment to Assess-and-Address.
5.1.4	Confirmed cases are remediated and documented following the Rainforest Alliance Remediation Protocol. Safety and confidentiality of the victims are protected throughout the process.	When safety of the victim is at risk.	
5.2.1	Workers have the right to form and join a union or workers' organization.	Usually	If the NC is only related to the written policy.



Requirement number	Topic	On-site follow up audit required	Remote follow-up audit allowed
5.2.2	Workers are not subject to discrimination or retaliation for reasons of past or present workers' organization or union membership or activities.	Usually	If the NC is related only to record keeping of terminations.
5.2.3	Management provides workers' representatives reasonable paid time off from work to carry out their representation functions and attend meetings, access to a notice board and establishes a genuine dialogue.	Usually	If the NC relates only to the absence of records of meeting minutes.
5.3.1	Permanent and temporary workers have contracts (written or verbal depending on conditions). Written ones signed by both parties and workers receive a copy.	Usually	When the NC relates only to the absence of evidence of verbal contracts.
5.3.2	Management does not engage in arrangements or practices designed to eliminate or reduce workers' pay and/or benefits.	Always	
5.3.3 – 5.3.4	Workers receive at least the applicable minimum wage, or the wage negotiated in a Collective Bargaining Agreement (CBA), whichever is higher. Adjusted yearly for inflation. Conditions for piece work.	Usually	When the NC relates only to the absence of record keeping in relation to payment of wages.
5.3.5	Deduction of wages permitted if provided by applicable law or CBA and by worker if voluntary. Not allowed deductions listed. Regulations for in-kind benefits.	Usually	When the NC relates only to the absence of record keeping in relation to deductions and in-kind benefits.



Requirement number	Topic	On-site follow up audit required	Remote follow-up audit allowed
5.3.6 and 5.3.7	Workers are paid regularly at scheduled intervals.  Maintenance of records per worker. In-kind benefits.	Usually	When the NC involves only record keeping.
5.3.8	Work of equal value is remunerated with equal pay.	Usually	When the NC involves only record-keeping.
5.5.1	Regular working hours per day and week, breaks and days of rest. Regular working hours of guards.	Usually	When the NC involves only record-keeping.
5.5.2	Overtime work is voluntary and permitted under a list of conditions.	Usually	When the NC involves only record-keeping.
5.6.4	Access to sufficient and safe drinking water.	Usually	When the NC relates to evidence of testing of the water quality parameters.
5.6.6	Workers in small farms have access to sufficient and safe drinking water.	Usually	When the NC relates to evidence of testing of the water quality parameters.
5.6.7	Sufficient and clean and functioning toilets and handwashing stations.	When the NC is related to workers being able and allowed to access and use these facilities.	
5.6.9	Persons that work in hazardous situations (e.g., under challenging terrains, with machines or with hazardous materials) use appropriate Personal Protective Equipment (PPE). These persons are trained in the use of the PPE and have access to the PPE free of charge.	When the NC is related with charges to workers for required PPE.	





Requirement number	Topic	On-site follow up audit required	Remote follow-up audit allowed
5.6.11	Working conditions of pregnant, nursing or recently given birth females.	When the NC relates to farms carrying out pregnancy tests as part of the hiring process.	
5.7.1	Conditions of lodging for workers and their families.	When the NC relates to children being separated from their parents.	