



**UEBT**  
SOURCING<sup>®</sup>  
WITH RESPECT

# Chain of Custody Approval Requirements

for Companies and Organisations  
purchasing UEBT certified or verified ingredients  
that wish to make a UEBT claim

Version February 2022  
(with application form)

## **UEBT**

UEBT is a non-profit association that promotes sourcing with respect. We work to regenerate nature and secure a better future for people through ethical sourcing of ingredients from biodiversity. We aim to contribute to a world in which all people and biodiversity thrive.



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## I. Introduction and who is this document for

This document is for companies that buy, trade or process UEBT certified or verified natural raw materials and wish to make claims of 'UEBT certified' or 'UEBT verified' for these ingredients in their communications channels. To make claims, these entities must receive chain of custody approval from UEBT and follow the [UEBT Claims and Labelling Policy](#).

The document lays out the requirements to obtain chain of custody approval from UEBT. It includes the conditions that need to be in place for UEBT to confirm that an adequate chain of custody system exists for the verified or certified natural raw material.

These requirements apply to UEBT certified or verified natural raw materials that are bought, processed, and/or sold as UEBT certified or verified. The requirements apply to companies in all stages of processing (storage, processing, transport), including any sourcing or technologies that may require ABS permits.

All companies in the supply chain that come after the UEBT certificate or verification holder **and that wish to make a claim about UEBT**, need to obtain UEBT chain of custody approval.

When we refer to the 'certification or verification programme' throughout this document, we mean the UEBT assurance programmes – specifically UEBT ingredient certification and UEBT verification. This document is not for claims related to the UEBT / Rainforest Alliance Herbs & Spices programme (see next section).

### What is chain of custody and how is it confirmed?

Chain of custody is 'the custodial sequence that occurs as ownership or control of the material supply is transferred from one custodian to another in the supply chain' (Source: WWF).

Chain of custody systems within a company usually involve a set of documents and mechanisms used to verify the traceability between the UEBT verified or certified source of the ingredient and the claim about a final product. The system usually involves a monitoring mechanism and a set of reporting documents.

UEBT works with purchasers to confirm the chain of custody or traceability in the supply chain where a UEBT certificate or verification attestation is issued.

## II. Rainforest Alliance certified claims

For the UEBT / Rainforest Alliance Herbs & Spices Programme, certification requirements are against the UEBT standard and a Rainforest Alliance supplement (together called the Herbs & Spices requirements) and the Rainforest Alliance certification seal may be used. Because of this, the Rainforest Alliance Supply Chain Requirements will apply rather than the UEBT chain of custody requirements. Visit the Rainforest Alliance web site at [www.rainforest-alliance.org](http://www.rainforest-alliance.org) for more information or write to Rainforest Alliance at [herbsandspices@ra.org](mailto:herbsandspices@ra.org) for guidance.

The UEBT certification label may also be available for use. Contact us at [herbsandspices@uebt.org](mailto:herbsandspices@uebt.org) for more information.



### III. The UEBT standard

UEBT verification and certification is based on the Ethical BioTrade Standard July 2020 (UEBT standard). The UEBT standard consists of seven principles covering important social, environmental, and economic issues. Companies and other organisations use the Ethical BioTrade Standard to promote practices that respect people and biodiversity in their operations and along their supply chains – all the way to the cultivation or wild collection sites. The UEBT standard is used to independently check that these practices are systemically applied.

For chain of custody approvals from UEBT, there will be a check at the company level of six minimum requirements that come from the UEBT standard. See more below under '*The Requirements – 4. Compliance with Minimum Requirements.*'

Learn more about the UEBT standard or download a copy here: <https://www.ethicalbiotrade.org/setting-the-standard>

### IV. Definitions

- **Buyers:** companies that purchase UEBT certified or verified raw materials.
- **Handling:** storage, transport, processing of certified or verified natural raw materials, including subcontracted processing services.
- **Natural Raw Materials:** Raw material derived from components of biodiversity. That is, material or compounds derived directly or indirectly from plants, animals, fungi or microbial organisms. For example, plant parts (e.g. flowers, leaves, roots, stems, fruits or bark) and plant compounds (e.g. plant-based oils, butters, waxes, extracts, flavours, fragrances, colorants). Plant cells, microorganisms, algae and beeswax would also be covered.
- **UEBT chain of custody approved companies:** companies, or other types of organisations, buying, handling or selling UEBT certified or verified natural raw materials with the intention of making claims regarding UEBT certification or UEBT verification of these natural raw materials to their clients.
- **UEBT certificate holders / UEBT verification attestation holders:** The company or organisation that holds the UEBT certificate or verification attestation and manages the certification or verification.

### Why does UEBT call it 'ingredient' certification?

It is important to clarify the link between “ingredient” and “raw material.” In the UEBT context, these terms mean the same. In its general communication (such as in our web site or in the name of this programme), UEBT uses the term “ingredient,” which is widely understood to refer to the material, substances or mixtures that go into food, cosmetic or pharmaceutical products. Among companies, however, “ingredient” is a technical term and may be understood in different ways. To avoid confusion, in its technical communication, UEBT uses the term “raw material” to refer to the material, substances or mixtures that go into food, cosmetic or pharmaceutical products – whether it is crude or processed, pure or combined.

Biodiversity is the variety of life on Earth – the diversity of ecosystems, species, and genes within species. Any living organism is considered a component of biodiversity, whether plant, animal, microorganism, or fungus. The Ethical BioTrade Standard thus applies to raw material such as plant parts (e.g., flowers, leaves, roots, stems, fruits, or bark) and plant compounds (e.g., plant-based oils, butters, waxes, extracts, flavours, fragrances, colorants). Plant cells, microorganisms, algae, and beeswax would also be covered. The UEBT standard also refers to this type of raw material as “natural raw material.”

## V. The Requirements

The UEBT chain of custody approval consists of a system check and minimum requirements check.

*Chain of custody system check:* This checks that the natural raw material sold as UEBT certified or verified comes from UEBT certified or verified sources.

1. Compliance with UEBT traceability requirements
2. Compliance with UEBT reporting requirements
3. Adhering to UEBT claims and labelling policy (for renewals only)

*UEBT minimum requirements check:* This checks that chain of custody applicant companies respect a set of UEBT minimum requirements on human rights, deforestation, no child labour, non-violation of access and benefit-sharing (ABS) regulation, etc.

4. Compliance with UEBT Minimum Requirements
5. Check of ABS applicability

UEBT chain of custody approved companies commit to continue to comply with these requirements above. They also commit to immediately informing UEBT when public controversy arises around the ethical sourcing practices of the organisation, its buyers or its UEBT verified or certified ingredients.

UEBT has the right, at any time to conduct unannounced audits to verify compliance with these UEBT requirements and has the right to cancel the chain of custody approval in case of any non-compliance with the UEBT requirements.

## 1. Traceability requirements

### ***Organisation has a traceability management system in place***

- a) The organisation shall have a traceability system that allows that any certified or verified ingredient upon receipt can be traced from point of purchase to point of sale.
- b) Documentary records shall be able to link certified or verified ingredient at every stage between purchase and sale, including receipt, processing, transport, packing, storage, and dispatch.
- c) Records of certified raw materials shall be accurate, complete, and unaltered.
- d) If processing or packing/repacking occurs, records shall allow conversion rates for certified or verified outputs from certified or verified inputs over any given batch or time period to be calculated. Conversion rates of certified or verified products shall be justifiable and accurate.
- e) The organisation shall only sell as certified or verified the raw materials covered by in the scope of the chain of custody application.
- f) The organisation has appointed responsible staff to act as primary contact between the organisation and UEBT and to also make sure that the traceability management system is being well implemented
- g) The organisation ensures that responsible personnel are trained and competent in order to ensure conformity with the UEBT chain of custody requirements.
- h) The organisation shall maintain records that demonstrate conformity with the UEBT chain of custody requirements for at least 5 years.

### ***Certified natural raw materials come from UEBT certificate holders, UEBT chain of custody approved companies, or UEBT verification attestation holders***

- i) The organisation shall have procedures in place to ensure that all certified or verified natural raw materials are purchased from UEBT certificate holders, verification attestation holders or UEBT chain of custody approved companies.
- j) Organisations trading and/or handling UEBT certified or verified natural raw materials shall have a procedure in place to confirm the UEBT certified or verified status of natural raw materials upon receipt.
- k) Organisations with certified or verified natural raw materials in stock at the time of the chain of custody check shall be able to demonstrate that these natural raw materials were purchased from UEBT natural raw materials certificate or verification holders and/or UEBT chain of custody approved companies and comply with all relevant requirements in this document.

### ***UEBT certified or verified natural raw materials are physically identifiable and segregated***

- l) The organisation enables visible identification of UEBT certified or verified ingredient(s). This can be done (with or without the UEBT logo) by making references on signs, or with tags/labels on bags/pallets.
- m) If natural raw materials are sold as certified, they shall be identifiable as certified on the line item of the related invoice.
- n) The organisation shall operate a system that ensures packaging, labels, and other materials identified as certified can only be used for certified natural raw materials.
- o) To promote or claim natural raw materials as certified, UEBT Chain of Custody Certification shall have been obtained no later than 4 months after the date that the UEBT first certified materials were physically delivered.

***90% certified or verified content to make claims***

- p) 100% of the natural raw material must be UEBT certified or verified to be sold as 'UEBT.' If this is not the case, no UEBT claim can be made for the raw material. However, for end products with a consumer-facing claim, 90% or more of the natural raw material in the product with the UEBT claim may come from UEBT certified or verified sources to make a 'UEBT certified' or 'UEBT verified' claim, respectively.

***Certified natural raw materials are traceable, and volumes are recorded***

- q) There shall be no substitution of certified or verified natural raw materials with non UEBT certified or verified natural raw materials.
- r) The organisation makes an overview of the total annual volume purchased and sold of UEBT certified or verified ingredient(s). The volume sold does not exceed the volume purchased. The overview includes:
- stock remaining from the previous year (carried over volumes).
  - inputs received.
  - conversion rates.
  - inputs still in stock.
  - outputs still in stock.
  - outputs sold.

***Compliance for subcontractors***

- s) If part of the product handling is outsourced, e.g., processing, the organisation shall assure that the subcontractor complies with all requirements in this document.

**2. Compliance with UEBT reporting requirements**

- a) The organisation shall submit an annual report of purchases and sales of natural raw materials. Reports are submitted with the initial application for chain of custody approval and then for the renewal not later than six (6) weeks prior to the renewal date on the chain of custody approval letter. The reports shall use the UEBT chain of custody reporting template (see annex in the application form at the end of this document).

**3. UEBT Claims Policy (for chain of custody renewals)**

- a) The organisation making UEBT claims in any communications channels, on- or off- product, follows the UEBT claims and labelling policy.
- b) The organisation shall inform its clients, who purchase the ingredients or products with the UEBT claim, of the UEBT chain of custody requirements and the UEBT Claims and Labelling Policy, in case such clients may wish to also sell or market the product or the ingredient as 'UEBT certified' or 'UEBT verified.'

**4. Compliance with UEBT Minimum Requirements**

Each of the following six UEBT minimum requirements will be checked – for more information on each see the UEBT standard – indicator number referenced.

- a) Conversion or deforestation of intact ecosystems: The chain of custody applicant and its subcontractors (if any) do not undertake any activity, as part of its own operations, that has resulted in conversion or deforestation of intact ecosystems after 1 January 2014 (UEBT standard reference: Minimum indicator 1.2.1)
- b) Rare, threatened or endangered species: If the chain of custody applicant and its subcontractors (if any) cultivate, collect or otherwise work with rare, threatened or endangered species, it complies with applicable international or national legal requirements, including the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) (UEBT standard reference: Minimum indicator 2.1.1)
- c) Protected areas: The chain of custody applicant and its subcontractors (if any) do not undertake any activity, as part of its own operations, in areas that are protected and where such activities are not allowed (UEBT standard reference: Minimum indicator 2.1.2)
- d) Human rights, non-discrimination: The chain of custody applicant and its subcontractors (if any) respect human rights, including by ensuring there is no physical, verbal or financial discrimination due to ethnic or national origin, gender, religious or political affiliation in its operations (UEBT standard reference: Minimum indicator 6.1.1)
- e) No child labour: The chain of custody applicant and its subcontractors (if any) do not employ children under the legal minimum working age or under 15 years of age (UEBT standard reference: Minimum indicator 6.2.1)
- f) Minimum wages: The chain of custody applicant and its subcontractors (if any) pay employees, including seasonal staff, in line with minimum wage regulations and other applicable legal requirements (UEBT standard reference: Minimum indicator 6.3.1)

## 5. Check ABS applicability

If laws or regulations on access and benefit sharing (ABS) apply to the applicant's activities, UEBT will check whether the organisation is aware of, and takes steps to comply with, any applicable legal requirements.

For more information about access and benefit-sharing, please visit:  
<https://www.ethicalbiotrade.org/access-and-benefit-sharing>

## VI. How UEBT assesses chain of custody

For organisations that are deemed low risk by UEBT, chain of custody requirements will be checked by UEBT through desktop assessments.

In situations that UEBT deems as low risk, assessment of traceability and the organisation's related reporting requirements may be reduced to every three years. In some cases, audits from other credible standards systems can be accepted as proof of meeting one or more of the sets of requirements listed above.

For organisations with operations that are deemed high risk, for example those organisations with complex supply chains or significant conventional ingredients mixed with the certified or verified ingredients, UEBT may require that certain indicators are checked on site by a UEBT staff expert or





by a UEBT qualified Certification Body<sup>1</sup>. If this is the case, the costs of these on-site assessments must be covered by the applicant organisation.

UEBT reserves the right to select certain chain of custody approved organisations for random on-site checks of these requirements. This will be communicated to the organisation at least one (1) month before the on-site visit, along with detailed information on 1) the suggested dates for this process and 2) what requirements will be checked during the visit. UEBT chain of custody approved organisations are required to collaborate with UEBT staff or designates in the fulfilment of these on-site checks.

### Preparing for the UEBT desktop check – what documents to send us

To show compliance with these UEBT requirements, documentation should be submitted to UEBT along with the application form. Documents that may be suitable include the following:

- ✓ *For traceability:* contracts or invoices showing volumes and natural raw materials and linkages to the UEBT certificate or verification holder, along with a report of UEBT certified purchased ingredients.
- ✓ *For UEBT minimum indicators:* certificates or validation documents by reputable, credible sustainability standards or reporting systems that cover the issue. This may include self-reporting documents if they have been validated by a second or third party.

## VII. Costs

Upon successful approval of chain of custody, non-members to UEBT will pay a chain of custody approval fee. The fees cover the costs of the UEBT desktop assessment. The current fees can be found on the UEBT web site at our [Costs page](#).

For organisations that are making claims that are consumer-facing such as on marketing materials, consumer-facing social media, or on-product (where allowed for consumer-facing end products), additional licensing fees may apply. Write to [claims@ethicalbiotrade.org](mailto:claims@ethicalbiotrade.org) once you receive your chain of custody approval to learn more about what claims are possible, review the [UEBT Claims and Labelling Policy](#) for more tips and claims use information, and submit your claims text or artwork for approval at the email above.

## VIII. How to apply for chain of custody approval

1. Submit the application (in the Annex of this document) and all supporting documentation to [certification@uebt.org](mailto:certification@uebt.org)
2. UEBT will determine the risk level and whether UEBT will conduct a desktop assessment or whether an on-site assessment will be needed. UEBT will notify the applicant company.
3. UEBT will conduct the desktop assessment, if a desktop audit is deemed sufficient, and request additional documentation as needed

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<sup>1</sup> Costs associated with on-site assessments of chain of custody indicators shall be entirely covered by the chain of custody applicant organisation.



4. If an on-site assessment is required, UEBT may ask the applicant to contact a UEBT qualified Certification Body or may assign a UEBT staff expert to conduct this visit. Additional costs will be borne by the applicant organisation.
5. Upon successful completion of the assessment, UEBT will issue the approval letter for the specific natural raw material (s).
6. Once approved, the company may make a UEBT claim in line with the UEBT claims policy. This can be initiated by sending the proposed artwork or text claims in writing to [claims@ethicalbiotrade.org](mailto:claims@ethicalbiotrade.org). For consumer-facing claims, an additional licensing fee may apply.

## **IX. Renewal process**

- Chain of custody approvals are renewed on an annual basis. To renew, the organization must submit a report using the UEBT template (see the application form: 'List of Ingredients to be included in the Chain of Custody approval') of volumes of the UEBT verified or certified natural raw materials, along with supporting documents such as contracts, invoices and/or documents that justify discrepancies in volumes (such as due to quality issues).
- The organization should also provide copies of any relevant certificates or verifications obtained for each natural raw material.
- UEBT will verify if a desktop assessment can be performed. Upon successful completion of the assessment, including verification of documents, a renewed approval letter will be sent to the company.



# Application Form

## For UEBT Chain of Custody Approval

**Instructions:** *This application form can also be filled out online. Click [here](#) to fill out the form and submit it electronically. Alternatively, you can fill out the form inside this document.*

**Offline Instructions:** *After filling out and signing this application form, please send it and the UEBT chain of custody report template in the annex via MS Word to facilitate data processing. Also please send the signed version of the application as a PDF. Email to [certification@ethicalbiotrade.org](mailto:certification@ethicalbiotrade.org)*

**Confidentiality:**

This form and the UEBT chain of custody reporting template (see annex) will be shared within the UEBT Secretariat. All those that review the form are bound to UEBT confidentiality requirements.

**Fees:**

Upon successful approval of chain of custody, non-members to UEBT will pay a chain of custody approval fee. The current fees can be found on the UEBT web site on our [Costs page](#):

**I. Contact information**

1. Organization name:

2. Address, telephone, fax:

Street: Postal code:

City: Country:

Company phone: Company e-mail:

3. Website:

4. Main contact person within your organization:

First name: Last name:

Title:

(Mobile) Phone E-mail:

5. The name of the person authorized by the applicant to sign the registration form:

First Name: Last Name:



### III. Declarations

- The organization commits to comply with the UEBT Chain of Custody Approval Requirements.
- The organization recognizes that UEBT has the right, at any time, to conduct unannounced audits to verify compliance with the UEBT Chain of Custody Approval Requirements.
- The organization commits to immediately inform the UEBT Secretariat when public controversy<sup>2</sup> arises around the ethical sourcing practices of the organization, its buyers or its UEBT verified or certified ingredients.
- The organization recognizes that UEBT has the right to cancel the chain of custody approval in case of any non-compliance with the UEBT requirements.

### IV. Procedure

- a. Submit this application, the UEBT chain of custody reporting template (see annex next page) and all supporting documentation to prove compliance with the UEBT chain of custody approval requirements (see box in the requirements document on 'Preparing for the UEBT check – what documents to send us') to [certification@uebt.org](mailto:certification@uebt.org)
- b. UEBT will determine the risk level and whether UEBT will conduct a desktop assessment or whether a physical audit will be needed. UEBT will notify the applicant company if a physical audit will be required.
- c. UEBT will conduct the desktop assessment, if a desktop audit is deemed sufficient, and request additional documentation as needed.
- d. If a physical audit is required, UEBT may ask the applicant to contact a UEBT qualified Certification Body or may assign a UEBT staff expert to conduct an on-site visit.
- e. Upon successful completion of the desktop assessment, UEBT will issue the approval letter for the specific natural raw material (s).
- f. Once approved, the company may make a UEBT claim in line with the UEBT claims policy. This can be initiated by sending the proposed artwork or text claims in writing to [claims@ethicalbiotrade.org](mailto:claims@ethicalbiotrade.org).
- g. Company submits an annual report no later than six (6) weeks prior to the renewal date on the chain of custody approval letter. The reports shall use the UEBT chain of custody reporting template (see Annex next page)

### V. Authorization

I, \_\_\_\_\_, being the duly authorized representative of the registering organization, do hereby declare that all the information contained in this form is correct, and that the organization understands and agrees to comply with all conditions as set forth in this application form and the related documents referred to herein.

Signed: .....

Date: .....

<sup>2</sup> Public controversy is any situation, whether or not stakeholders are aware of or may become aware of, that could seriously damage the reputation of the organisation, particularly when it is a situation that threatens to do serious harm to people or biodiversity.

## ANNEX: UEBT Chain of Custody Reporting Template

Please list the ingredients to be included in the Chain of Custody approval

*(to be filled out by new applicants and renewal applicants – please attach supporting documentation)*

Name of the natural raw material	<b>Handling:</b> <ul style="list-style-type: none"> <li><i>Please provide a brief description of the process (storage, processing, transport) within your organization.</i></li> <li><i>If there is any processing, please briefly describe the processing techniques, location and if any subcontractors are involved.</i></li> </ul>	<b>Supplier information:</b> <ul style="list-style-type: none"> <li><i>Please provide the name of the supplier of the UEBT verified or certified material.</i></li> </ul>	<b>Volumes:</b> <ul style="list-style-type: none"> <li><i>Please state the volumes purchased for the most recent year.</i></li> </ul>	<b>Certifications:</b> <ul style="list-style-type: none"> <li><i>Please state any other certifications or verifications obtained for the material and submit supporting documentation to show compliance with UEBT minimum indicators.</i></li> <li><i>Company should also submit certifications or verifications at the company level (not specific to a natural raw material) that may prove company-level compliance with minimum indicators.</i></li> </ul>

\*Please add more lines if need

