



UEBT
SOURCING[®]
WITH RESPECT

REQUIREMENTS FOR CERTIFICATE HOLDERS

COMPANIES NOT LOCATED IN THE SOURCING AREAS

For UEBT Ingredient Certification and UEBT/Rainforest Alliance
Herbs & Spices Programme

Version May 2022

TABLE OF CONTENTS

1. Who this document is for	3
2. Introduction and purpose of this document	4
2.1. The UEBT ingredient certification programme	4
2.2. The UEBT / Rainforest Alliance Herbs & Spices Programme	6
2.3. Overview of the process to obtain certification	8
2.4. Internal and external components of the programme	10
3. Monitoring of good practices	11
3.1. Internal monitoring system – set up	11
3.2. When UEBT membership is required	12
3.3. Scope of the audit	13
3.4. Equivalency of in-house company standards	15
3.5. IMS policies and specific requirements	16
3.6. Policies regulating on-site inspections	20
3.7. Roles and responsibilities	27
4. The External Audit	28
5. Monitoring and Evaluation Data	29
6. Key terms	31
Annex 1: Specific rules for annual sampling	33
Annex 2: Profile of the Certification Coordinator	35
Annex 3: Profile of monitoring personnel	37
Annex 4: Profile of Local Manager or Coordinators	38
Annex 5: Traceability requirements	40
Annex 6: Assessing Access and Benefit-sharing (ABS) requirements	42
Annex 7: Description of the UEBT scoring system	43
Annex 8: Cancellation or suspension	45
Annex 9: UEBT Theory of Change	47

1. Who this document is for

This document is specifically for any current or potential UEBT certificate holder that is a:

- processing company that is not located in the sourcing regions
- buying or manufacturing company (often with final products) that is not located in the sourcing regions



If you represent the following:

- an individual farm or plantation
- a group of farms
- a producer or collector/picker organisation or cooperative
- a local organisation or company based in the sourcing areas such as a local processing company

Then you do not need to read this document and should instead download and read the *UEBT Requirements for Certificate Holders* that is specifically for 'farms and local companies.' This document can be found in the Resources section of the UEBT web site at <https://www.ethicalbiotrade.org/resources>.

If you are unsure which set of requirements pertains to you, please write to us at certification@uebt.org to discuss before you set up your systems to prepare for your external audit.

Note for auditing partners reading this document: A key document for auditors is the *UEBT System Checklist* which is used by external auditors when conducting full audits for UEBT certification programmes. The *System Checklist* translates the information from this *Requirements for Certificate Holders* document specifically for the auditors' use in assessing the certificate holder.

2. Introduction and purpose of this document

This document is for potential certificate holders who wish to become part of the UEBT ingredient certification programme or the UEBT/Rainforest Alliance Herbs & Spices Programme. It is also useful for current certificate holders.

This includes companies located outside of sourcing areas (such as processors and manufacturers).

In this document when we refer to 'certificate holders' we mean both current and potential certificate holders.

The document lays out the different steps and requirements to prepare for your external audit in the UEBT ingredient certification programme or UEBT / Rainforest Alliance Herbs & Spices Programme. It includes the conditions that need to be in place and the steps that should be followed for monitoring the implementation of the good practices in the UEBT standard and ensuring compliance with those requirements. It helps a certificate holder to prepare for an external audit by a certification body.

When we refer to the 'certification programme' throughout this document, we mean either of the two programmes – UEBT ingredient certification or UEBT / Rainforest Alliance Herbs & Spices Programme.

2.1 The UEBT ingredient certification programme

UEBT's certification of ingredients from biodiversity assures that a natural raw material is sourced with respect for people and biodiversity. Certification is granted once independent audits check compliance with the Ethical BioTrade Standard (the UEBT standard) in the areas where ingredients from biodiversity are sourced. Traceability through to the area of collection or cultivation, and to the farmers and/or pickers is always required. Audits are conducted by third party auditors, but internal control systems that reduce the need for external audits can be deployed at different stages of the supply chain.

Here is an overview of the scope of this particular programme:

Who: This programme is for organisations and companies that source (cultivate, collect, process or purchase) natural raw materials. This programme is for farms, cooperatives, local processors or traders. It is also for companies that are sourcing natural raw materials from diverse sources and that systematically and closely monitor their supply chains regarding social and environmental practices.

What: This programme is focused on natural raw materials, often simplified in communications as 'ingredients' (see box for a description of this terminology). These include such natural raw materials as seeds, flowers, stems, leaves, fruits, nuts, resins, herbs, spices, beeswax, algae, roots and barks, among others. UEBT ingredient certification ensures that the sourcing of a natural raw material adheres to standards on sustainable use of biodiversity, fair and equitable benefit

sharing, local development and labour rights, among other issues covered in the UEBT standard.

Why is this called '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."

How: External auditors look at the physical areas of wild collection or harvest, and the conditions under which people work, both in the sourcing areas and in the processing of raw materials. This includes an inspection of wild collection areas and/or agricultural lands, and interviews with harvesters, farmers, farmworkers, smallholders, and/or pickers. UEBT certification is granted once external, independent audits check compliance with the UEBT standard in the areas where natural raw materials are sourced. More specifically, the tool used to assess compliance is a comprehensive 'UEBT Field Checklist' that is used to check that the requirements are met. For potential certificate holders in the UEBT/Rainforest Alliance Herbs & Spices Programme, there is a slightly different tool called the 'UEBT/Rainforest Alliance Consolidated Field Checklist' (see section 2.2). The checklists include all the criteria and indicators to be checked in the field and have a scoring system and guidance on how to score a potential certificate holder for each indicator.

Who can be a certificate holder

For UEBT ingredient certification (including the UEBT/Rainforest Alliance Herbs & Spices Programme), a certificate holder can be any of the following types of entities:

1. Buying companies – local, national or international
2. Processing companies – local, national or international
3. Individual farms of any size
4. Farmer groups or producer cooperatives

Note for farms and companies located in sourcing areas: Individual farms, cooperatives or companies located in sourcing areas should download and read the version of this *UEBT Requirements for Certificate Holders* that is specifically for 'farms and local companies.'

2.2 UEBT/Rainforest Alliance Herbs & Spices Programme

This document is also for the UEBT/Rainforest Alliance Herbs & Spices Programme. This programme brings together the current UEBT/UTZ Herbal Tea Program along with the UTZ and Rainforest Alliance certification programs for herbs, spices, rooibos, and vanilla.

Scope of the programme

The UEBT/Rainforest Alliance Herbs & Spices programme applies to:

- all ingredients for herbal and fruit infusions, including rooibos
- other herbs & spices, including vanilla, chili, or pepper

What standards apply

The certification for farm certificate holders in the Herbs & Spices Programme is based primarily on the UEBT standard since the standard was designed for ingredients that are cultivated or collected from the wild (in technical terms, this means natural raw materials cultivated or wild collected).

The UEBT standard is complemented by [selected requirements](#) from the new Rainforest Alliance 2020 Sustainable Agriculture Standard. Together, these are part of the UEBT/Rainforest Alliance requirements. For practical purposes, these requirements are described in a [consolidated Field Checklist](#) based on the UEBT standard and the selected Rainforest Alliance requirements and a System Checklist based on this Requirements for Certificate Holders as well as additional assurance system requirements from Rainforest Alliance.

Exceptions to the programme

- Organisations that are cultivating **herbs, spices, rooibos or other herbal tea ingredients together with coffee, cocoa, tea, fruit, nuts, flowers, vegetables or palm oil**, and that wish to use the Rainforest Alliance trademarks and claims for these crops, certification against the Rainforest Alliance 2020 Standard applies. This certification covers all crops cultivated on the farm, including herbs, spices, rooibos and other herbal tea ingredients. Please note, that this excludes wild collection, for which an additional certification against the UEBT/Rainforest Alliance requirements is always required to use the Rainforest Alliance trademark and claims.
- For organisations that do not wish to use the Rainforest Alliance trademarks and claims for the coffee, cocoa, tea, fruits, nuts, flowers, vegetables or palm oil they are cultivating, UEBT/Rainforest Alliance

requirements apply. This UEBT/Rainforest Alliance certification will cover all herbs, spices, rooibos and other herbal tea ingredients cultivated on the farm (but no other crops). It will also cover wild collection.

- Organisations that are cultivating **chili or pepper** (*piper nigrum*) without any other Rainforest Alliance Certified crop (such as coffee, cocoa, tea, fruit, flowers, nuts, vegetables, or palm oil) may choose between certification against the UEBT/Rainforest Alliance requirements or against the Rainforest Alliance 2020 Standard
- Certificate holders that are **collecting herbs, spices, or herbal tea ingredients from the wild** will always be required to comply with the UEBT/Rainforest Alliance requirements (because they are based on the UEBT standard that has criteria on wild collection) in order to use the Rainforest Alliance trademarks and claims.

Supply chain actors sourcing certified products

Buying or processing companies that do not hold a UEBT/Rainforest Alliance certificate for the Herbs & Spices Programme (are not certificate holders) but are sourcing products certified as part of the new Herbs & Spices Programme would require Rainforest Alliance certification against the new Rainforest Alliance 2020 Sustainable Agriculture Standard's [Supply Chain Requirements](#). Companies that previously used the UTZ Chain of Custody standard will need to, starting July 2021, use the 2020 Rainforest Alliance Supply Chain Requirements.

Claims and labels

All ingredients certified under the UEBT/Rainforest Alliance Herbs & Spices Programme will be able to carry the Rainforest Alliance Certified seal or UTZ certification label and/or be linked to the Rainforest Alliance or UTZ certification claims. For labelling and claims, the [Rainforest Alliance Labelling and Trademarks Policy](#) or the [UTZ Labelling and Trademark Policy](#) apply.

The Rainforest Alliance introduced a new certification seal in June 2020 which will replace the current Rainforest Alliance Certified seal and the UTZ label. Companies are welcome to submit labelling approval requests with the current Rainforest Alliance Certified seal or the UTZ label until December 31, 2022. Read more on [timelines](#) and phasing out of the current seal options.

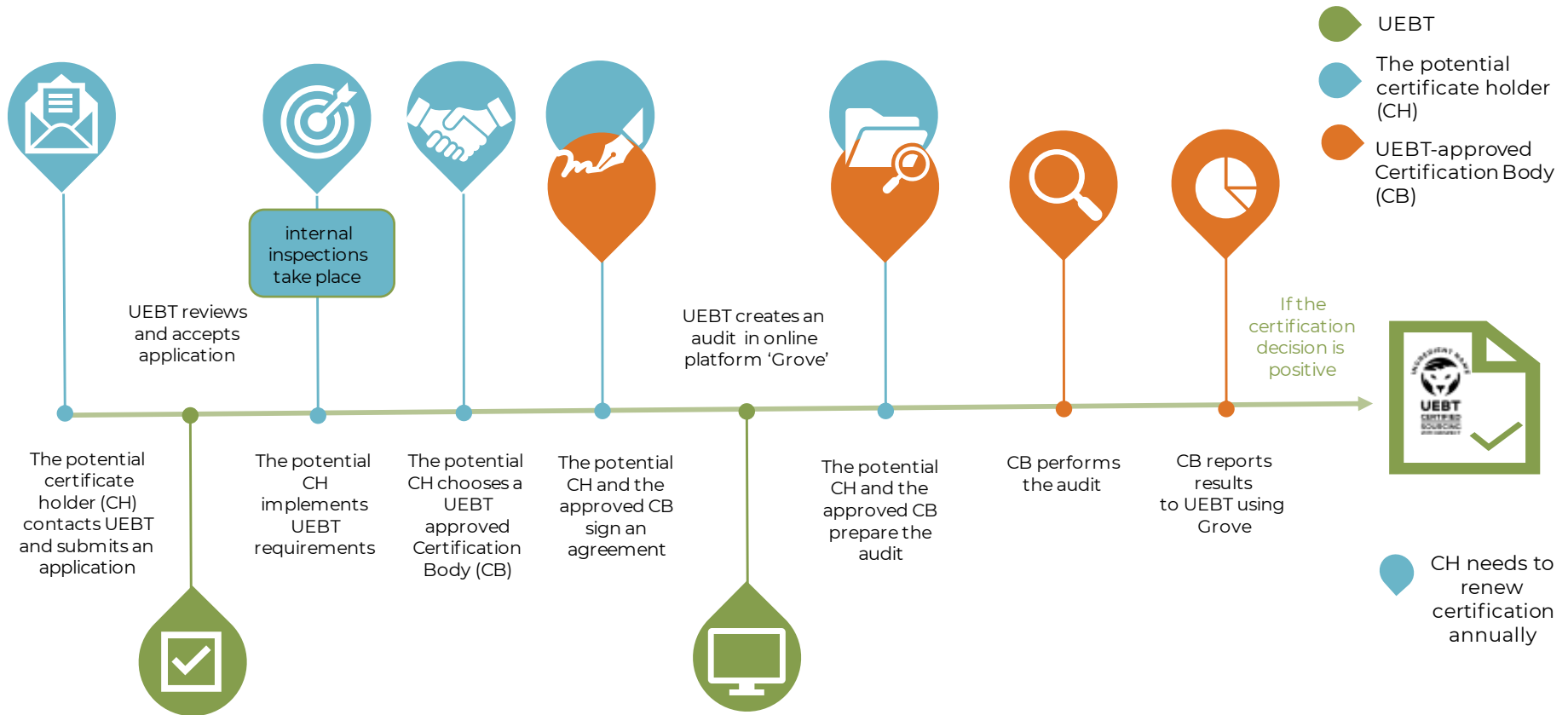
The [UEBT certification label](#) may also be available for additional use. Contact UEBT for more information.

Please contact herbsandspices@uebt.org for more information on this programme.

2.3 Process to obtain UEBT certification

On the next page, figure 1 shows the process from the beginning for the certificate holder (CH) to receive a certificate. Note that much of this document describes what takes place in the preparation period before scheduling the external audit with the certification body (CB), with a good deal of focus on the systems and procedures to help you with the third step shown in this graphic – called ‘the potential CH implements UEBT requirements’ through and until the step called ‘CB performs the audit.’

Figure 1: Overview of the process to obtain UEBT certification



2.4 Internal and external components of the programme

The certification programme consists of two main components:

- **Internal Monitoring System (IMS)** – *operated by the certificate holder and used to conduct internal inspections of practices and show compliance with the UEBT standard.*
- **External Certification Audit** – *the third-party audit that is implemented by a UEBT qualified external certification body to check that compliance is in place and certification may be awarded.*

3. Monitoring of good practices

All certificate holders can prepare for and monitor good practices on the farms or collection areas, or in their supply chain. But an internal monitoring system is required for those companies that are not located in the sourcing areas.

3.1 Internal monitoring system – set up

The **Internal Monitoring System (IMS)** is an internal system implemented and operated by the certificate holder to ensure the good practices are in place. It is also used to conduct inspections in the supply chains that have been selected for the certification and to demonstrate their compliance with the Ethical BioTrade Standard. To establish an IMS, the certificate holder needs to select qualified and dedicated staff. Several requirements should be met when setting up the local monitoring system (see sections 3.5 and 3.6) but when the IMS is well-functioning it can reduce the checks needed by the external auditors (see Annex 1).

There are different setups according to the complexity and structure of the supply chain, and the position of the certificate holder in it.

The internal monitoring system (IMS) is implemented when the certificate holder is not an organisation at source but is a company that sources natural raw materials through other companies or organisations at source. The number of organisations involved might look like this:

- **The certificate holder** – a buying or processing company
- **One or more (or many) organisations at source that supply the certificate holder** – these can be based in different countries / sourcing areas
- **Sub-suppliers** or other intermediaries at the local level, such as warehouses, packing or collecting centres in some cases (if these exist)
- **Field operators** – the farmers or workers/pickers that are growing or collecting or taking care of the natural raw material. These may be individuals or groups.

Here are the two possible IMS set ups:

1. **IMS with regular on-site internal inspections done by the certificate holder.**

The certificate holder (the buying or processing company that is not an organisation at source) uses their own internal auditors (dedicated and qualified staff) to conduct the on-site inspections (audits). This option requires a larger investment from the certificate holder in terms of internal auditing policies and staff but allows for better integration and understanding of the certified supply chains.

2. IMS with outsourced on-site internal inspections done by a certification body.

The certificate holder outsources to an external certification body to conduct on-site audits. In this option, the certificate holder has less elaborate IMS policies and procedures to set up and does not have to hire or train internal auditors.

In some cases, the organisation at source might have high risk or more complexity in their supply chain, such as working with large numbers of small holders or pickers/collectors. In these instances, they may need to have a local monitoring system or LMS. With an LMS they would have one of their supplier organisations at source (such as a local processor) conduct the on-site internal inspections as described in (1) above or they would have a certification body conducting the visits as describe in (2) above. This is usually optional but is sometimes mandatory (see box below for more information).

Local monitoring systems (LMS)

If the organisation or company that intends to be UEBT certified works with many smallholder farmers or collectors/pickers, it will often be beneficial to adopt what is called a local monitoring system or LMS.

Essentially it means that the LMS is used to check compliance of farms and field operators locally. The LMS is implemented by the organisation at source/certificate holder.

Individual farms or smaller organisations at source working with just a few farms do not need such a local monitoring system.

The LMS is sometimes mandatory. This is true for:

- Most supply chains working on wild collection production systems.
 - In some cases, very small-scale wild collection (e.g. less than 10 collectors, hired directly and for a 1-2 month harvest period, etc.) could mean that an LMS is not necessary. Contact UEBT to discuss your situation.
- Cultivation supply chains where the level of complexity is high due to high risk level in the risk assessment and/or a large number of farmers.
 - Generally, 30 or more farmers would make an LMS mandatory. Contact UEBT to discuss your situation.

UEBT understands there may be some situations that could be difficult to detect during internal audits due to some reasons such as: not selecting an appropriate sample, not using UEBT's official field checklist, overlooking proper data analysis or ignoring follow up required. It could also be difficult for an organisation to keep full control of its supply chain and so non conformities could be detected on Field Operators groups or while assessing them individually.

However, if during an external audit a non conformity related to a critical indicator is detected in more than 50% of the sample taken, this will be considered a systemic failure of the monitoring system and, therefore, the organisation will have to develop a root cause analysis, in order to determine the reasons for which this happened and to prevent the entire organisation to fall into this situation again. UEBT will request this to the auditee, based on the results of the last external audit and the organisation will have a total of 3 months after the last day of the audit to submit it to: certification@ethicalbiotrade.org

3.2 When is UEBT membership required?

The UEBT ingredient certification programme is open to all interested organisations or companies that acknowledge and adopt the requirements of the UEBT Ethical BioTrade Standard.

Processing companies and manufacturers located outside of the sourcing regions who wish to enrol in the UEBT certification programme, will need to apply for UEBT membership first. The membership programme allows for a more seamless transition to UEBT certification starting with having company sourcing commitments validated by UEBT and developing a workplan and goals that may include certification of one or more natural raw materials. These activities can also take place alongside each other, where membership and certification steps are conducted and assessed at the same time.

3.3 Scope of the certification – what is a ‘supply chain’ and who are the different actors

The scope of the certification is determined by the scope of the certificate holder’s IMS, namely by the supply chains included in, and monitored by, the IMS, and for which the certificate holder requests the certification. These supply chains for the purposes of this certification programme are to be distinguished from other supply chains which the organisation might work with, but which are not covered by the IMS for the certification programme.

A **Supply Chain** consists of a specific natural raw material sourced from a specific field operator or group of field operators (farms, group of collectors, etc.) that are managed by a specific organisation at source.

The different actors involved in these supply chains and how they should be monitored, include:

Field operators

Field operators are individuals (producers/collectors), or groups of individuals directly involved in the cultivation and/or collection of the natural raw material to be certified. They are considered the ‘smallest unit’ for the purpose of the monitoring activities. They may be:

- Small-scale producers/collectors or groups of them, or
- Individuals, such as employees, workers and family members, or groups of them who are directly involved in production/collection activities, as in the case of plantations/farms with own land and own management systems. Individuals forming part of a group are subject to internal inspections and external audits on a spot check basis.¹

How are field operators monitored? Field operators are subject to internal inspections on an annual basis (or less, based on risk – see Annex 1) - by the internal inspections of the certificate holder. Field operators are also subject to external audits on a spot check basis. Field operators will be assessed for compliance with the indicators in the UEBT Field Checklist (or equivalent- see section 3.4) or the UEBT/Rainforest Alliance Consolidated Field Checklist (for the UEBT/RA Herbs & Spices Programme) as applicable (field level requirements). In the case when field operators are in a group, the individual producers/collectors forming part of the group are subject to internal inspections and external audits by the certification body on a spot check basis, but they need to be 100% individually audited in a maximum of three (3) years' time.

Sub-suppliers

Sub-suppliers are intermediaries at the local level, such as warehouses, packing, drying or collecting centres that are sub-suppliers to the local company, in the case of local processors or traders.

How are sub-suppliers monitored? If they exist in the supply chain, sub-suppliers are also subject to internal inspections on an annual basis (see Annex 1) through the IMS of the certificate holder. They are also subject to external audits by the certification body on a spot check basis.

Organisations at source

'Organisations at source' are the units that manage the cultivation and/or collection activities of the natural raw material to be certified. An organisation at source may be:

- A company or organisation that manages several field operators and that takes responsibility for the correct implementation of the UEBT requirements applicable to them. Typically, an organisation at source would be a cooperative, an association, a non-government organisation, a farm/plantation with its own land and management system, or a company buying natural raw materials from the field operators.
- In exceptional cases, subject to approval by UEBT, an organisation at source may also be a company or organisation (within or external to the supply chain) managing several individual farms/plantations (with its own land and own management systems). In these cases, the farms/plantations

¹ A group of individuals may be field operators when they act collectively or uniformly (i.e., they follow same rules and procedures, in one same production/collection area), which allows them to be considered a unit. For example, villages of small-scale producers/collectors pursuing the same or similar agricultural practices.

would be considered field operators for the purpose of certification. This is only possible if:

- > The farms/plantations are small to medium sized family businesses and have the same, or similar, management systems and operating rules and procedures.
- > All farms/plantations have been rated as low risk based on a well-grounded risk-assessment conducted by the certificate holder.
- > The organisation at source has high influence over the farms/plantations it manages.
- > When necessary, the organisation at source has a solid and functioning local monitoring system (LMS) to monitor the farms/plantations with regards to their compliance with the UEBT requirements. Specific requirements for the LMS apply in these cases, regarding documentation and record keeping.

The organisation at source is directly responsible for compliance of the UEBT requirements applicable to them (management system requirements), and directly or indirectly responsible for compliance of the requirements applicable to the field operators which they manage.

How are organisations at source monitored? Organisations at source are subject to internal inspections by the certificate holder on an annual basis (see Annex 1) and to external audits by the certification body on a spot check basis. They will be assessed against the UEBT Field Checklist (or equivalent) or the UEBT/Rainforest Alliance Consolidated Field Checklist (in the case of the UEBT/RA Herbs & Spices Programme). The Field Checklist's scoring system is applicable at the organisation at source level, whereas the assessment results at field operator level are integrated into the final score for each indicator.

Service providers including subcontractors

A certificate holder must identify any service provider organisations (including subcontractors) involved in the supply chain that manipulate the natural raw material in terms of drying, cleaning, mixing, extraction, (re-) packing, or any other activity that change the structure or form of the natural raw material. These must comply with some of the UEBT requirements (indicators with a level of importance of: 'minimum,' 'critical,' and some 'critical stepwise' that are considered high risk) and UEBT traceability requirements and thus they must agree to internal inspections by the certificate holder and external audits by the certification body when and if necessary.

3.4 Equivalency of in-house company standards to the UEBT standard

For buying companies with internal monitoring systems, the company (that is the potential certificate holder) may use their own standard, field checklist and scoring system if those items are formally approved by UEBT as equivalent to

those used by UEBT (and by UEBT / Rainforest Alliance for the Herbs & Spices Programme).

Certificate holders may already have established standard(s) and scoring systems as part of their IMS, which they request their suppliers to comply with, and based on which they conduct the monitoring activities. In these cases, UEBT may recognize a certificate holder's standard(s) and scoring system as equivalent to the UEBT standard and scoring system requirements, if they include all relevant Ethical BioTrade Standard requirements and the equivalency of the standard and scoring systems has been approved by UEBT. The process is as follows:

1. The certificate holder compares their own list of compliance requirements for suppliers with the UEBT Field Checklist (or UEBT/RA Consolidated Field Checklist for the Herbs & Spices Programme) to assess the equivalency of the two documents. For this purpose, the certificate holder correlates each of the indicators of the Field Checklist with their own compliance requirements, also considering their respective level of importance ('weighting').²
2. To demonstrate equivalency, the certificate holder submits a comparison document to UEBT, which clearly identifies each of the UEBT requirements and level of importance in correlation to the certificate holder's requirements and level of importance, and indicates, if necessary, the action taken to ensure equivalency. The 'UEBT Template for establishing equivalency of standards and scoring system' shall be used for this purpose. The template is provided by UEBT upon request.
3. UEBT reviews the comparison document for approval of the standard and scoring system equivalency.
4. If approval is granted, UEBT authorizes the certificate holder to use their own list of compliance requirements and scoring system for monitoring their suppliers for the purpose of certification.
5. If a standard and/or scoring system revision takes place and a new version of the UEBT Ethical BioTrade standard and scoring system is applicable, a new approval of the in-house company standard and scoring system equivalency is required. The timelines for adopting any new UEBT standard and scoring system will be equally applicable to all certificate holders.

3.5 Internal monitoring system policies and general specifications

Companies seeking to participate in the UEBT certification programme need to implement a functioning IMS. The IMS will consist of similar elements as a third-party auditing system, such as standards, audit checklists, policies and standard

² Level of importance determines the relevance/weight of the requirements, i.e., whether they are critical (i.e., major, must), regular (i.e., minor, should), optional, or other.

operating procedures. Its main difference is that it will be operated by personnel of the certificate holder to monitor practices and compliance.

The certificate holder needs to demonstrate that their IMS meets all UEBT requirements as outlined in the following sections.

Scope

The IMS is applied to individuals or groups of individuals at field level (field operators / sub-suppliers) from which the certified natural raw material(s) originate(s), as well as the organisations that manage these entities. The certificate holder must identify and register all natural raw materials and respective field operators, sub-suppliers and organisations at source for which certification is sought.

All service providers that physically manipulate the natural raw material (e.g., pack, re-pack, process, or alter the raw ingredient in any way) must also be identified and are subject to internal and/or external checks against the UEBT standard.

3.5.1 Allocation of resources

The certificate holder agrees to make adequate resources available to implement and operate a reliable IMS. The certificate holder will appoint a skilled and experienced person within their own organisation (called the 'UEBT Coordinator'), who is authorized and responsible to implement the IMS. This person acts as a liaison between UEBT and the respective organisation(s) involved in the sourcing of the natural raw material. Further personnel may be needed for conducting the on-site monitoring activities. The UEBT Coordinator and monitoring personnel must receive induction training in the requirements of the UEBT Ethical BioTrade Standard and the UEBT certification programme.

The certificate holder will formally assign responsibility to a skilled and experienced person to implement UEBT requirements at the organisation at source, sub-supplier and field operator levels (called the 'Local Manager at Source'). This person may belong to the organisation at source involved in the supply chain and will act as a liaison between the certificate holder and the respective organisations at source and field operator(s). The person will also be the primary contact during on-site audits conducted by third parties and may act as an indirect contact for UEBT.

The certificate holder and the organisations at source must provide the appointed persons with the necessary resources (in terms of additional staff, time and monetary support) to carry out the necessary activities to ensure compliance with the UEBT requirements.

In addition, depending on the complexity of the supply chains, it may be necessary to establish a Local Monitoring System (LMS) at the level of an organisation at source. In this case, a qualified person who is responsible for the Local Monitoring System must be appointed locally (called the 'Local Coordinator at Source').

For more information on different roles to be assigned in this certification programme and the qualifications of these persons see section 3.7 and Annexes 2, 3 and 4.

3.5.2 Management of sub-suppliers and field operators

The certificate holder must ensure that all organisations at source, sub-suppliers and field operators understand and comply with the requirements of the UEBS standard. In this context a structure must be in place at source that allows for continuous management of the organisations at source, sub-suppliers and field operators.

All organisations at source and sub-suppliers included in the certification programme must confirm in writing their willingness to participate in the programme and to adhere to the respective UEBS requirements applicable to them.

3.5.3 Procedure for management of sub-suppliers and field operators

The certificate holder must make sure that there is a local structure in place with suitable personnel that has the necessary authority and resources to manage the implementation of the requirements of the UEBS Standard at source. This may be achieved by:

1. Assigning the tasks of organising sub-suppliers and field operators to a person from an existing organisation being part of the supply chain (organisation at source).
2. Utilizing the services of an existing organisation at source that is not part of the supply chain.

In either event, a qualified person (Local Manager at Source) is contractually appointed who is responsible for ensuring compliance with UEBS requirements. The Local Manager at Source is responsible for:

- Maintaining an up-to-date list of all sub-suppliers and field operators that are included in the certification programme and managed by the organisation at source.
- Ensuring (e.g., through training, verbal or written instructions, manuals, or other) that 100% of the sub-suppliers/field operators are sufficiently informed and capable of meeting the UEBS certification requirements.
- Ensuring that the organisation at source meets the UEBS certification requirements applicable to them.
- Ensuring that corrective measure requests (applicable to the organisation at source and sub-suppliers/field operators) are implemented within the specified timeframe.
- Facilitating any internal inspections and external audits conducted for the purpose of certification.

3.5.4 Performing a risk assessment

The certificate holder shall assess the risk of supply chains involved in the scope of the certification. This should include all situations in which the ethical and responsible sourcing of the ingredients may be jeopardized, including:

- Risks to the environment and biodiversity, in particular sensitive/endangered/protected areas and species.
- Risks to people involved in, or affected by, sourcing activities, in particular producers, collectors and local communities.
- Risks to the integrity of the business, e.g., risks related to compliance with local legislation and international regulations.
- External parameters such as country-specific or ingredient-specific risk factors.

The results from the risk assessment should be shared with the third-party auditor, who will use the information provided to better prepare for the audit. The risk assessment should be updated by the certificate holder every three (3) years or sooner if relevant changes occur that may affect the assessment results. Any known risks should also be communicated at the time of application for certification or re-certification. Contact UEFT for more support on this topic if needed.

3.5.5 Traceability requirements

The certificate holder must have a system in place that ensures compliance with the UEFT traceability requirements. Critical control points in the supply chains must be identified and monitored for this purpose. Critical control points for traceability include all organisations involved in the supply chains which manipulate the natural raw materials in terms of drying, cleaning, mixing, extraction, (re-) packing, or any other activity that change the structure or form of the product.

The certificate holder must ensure that a traceability system is in place and functioning at all levels in the supply chains. The certificate holder must advise relevant personnel (procurement, purchasing, receiving goods, etc.) to ensure that traceability requirements are met and that the required information and documentation is provided and recorded. The UEFT Coordinator at the certificate holder must instruct the personnel conducting internal inspections to check the critical control points regarding compliance with the UEFT traceability requirements.

For more information on traceability requirements, see Annex 5.

3.5.6 Documentation and record keeping

The UEFT Coordinator at the certificate holder is responsible for ensuring that all policies, procedures, processes, activities and decisions relevant for the UEFT certification programme are recorded and made available to monitors, external

auditors and other interested parties for their use or review. These include, among others:

- Documentation related to the monitoring process, such as monitoring visit reports, follow-up processes and outcomes, decision-making processes and relevant decisions taken, etc.
- Risk-assessments
- New appointments of IMS staff, including monitors
- Training and performance evaluation material of IMS staff
- Documentation related to any deviations from the UEBT requirements.
- Communication and documentation regarding disputes, grievances, deviations from regular procedures, and any other information that might have important implications for the certification process

The UEBT Coordinator at the certificate holder ensures that such documentation is kept for a period of at least five (5) years.

3.6 Policies regulating the functioning of the onsite internal inspections

3.6.1 Frequency and physical scope of on-site internal inspections

Monitoring visits shall be carried out at least on an **annual basis**. All sites and locations that belong to the various supply chain actors included in the scope and that are in any way involved in the sourcing of the natural raw material must be included in the visits and these are written down in the UEBT Field Checklist (or the UEBT/Rainforest Alliance Consolidated Field Checklist for participants in the UEBT/RA Herbs & Spices Programme). Service providers, if handling the natural raw material in any way, must also be included.

An audit schedule should be prepared. These internal inspections are done by either personnel designated by the certificate holder or they can be outsourced to an external certification body to do the internal inspections of the various supply chain actors and sourcing areas. For more information on the specific rules for the frequency of audits (and sampling), see Annex 1.

In exceptional cases where organisations at source, sub-suppliers or specific field operators have distinguished themselves through proactiveness, timely follow-up related to corrective actions as well as a high level of compliance over time, and which are overall rated as low risk, the UEBT Coordinator within the certificate holder may decide to reduce the physical scope or the frequency of the on-site internal inspections. In this case the internal inspections may be narrowed down to focus on critical sites, locations or suppliers; and the frequency of visits to the low-risk cases may be slowed to every second or third year. Such cases can only be applied under the following conditions:

- A full comprehensive monitoring visit is conducted, at the latest, within the third year following the last full monitoring visit.
- Continuous contact is maintained between the UEBT certificate holder and the concerning organisation, sub suppliers or field operators for the period of reduced monitoring. This may be in the form of technical support visits, training events, request for up-date (self-assessment) reports, or customer visits. Records of such activities are kept.
- The local organisation has a local monitoring system (LMS) in place, to check the compliance of the sub-supplier/field operators against UEBT standard (or equivalent).

The UEBT Coordinator within the certificate holder assesses and decides case-by-case whether an exception to the frequency and scope of internal inspections can be applied. The decision must be based on results of respective risk assessments, previous audit results and other relevant proof of distinguished performance of the concerned organisations. Respective documentation is kept and reassessed by the UEBT Coordinator within the certificate holder when necessary.

3.6.2 Planning on-site internal inspections

The certificate holder shall ensure that internal inspections are adequately prepared for and that sufficient resources in terms of personnel and time are allocated to conduct meaningful on-site visits of organisations at source, sub-suppliers and field operators.

UEBT Coordinator within the certificate holder makes sure that sufficient detailed information about the organisations to be monitored at source is available well in time for the on-site monitoring visit. UEBT Coordinator within the certificate holder must review above information to ensure that it is complete and comprehensible.

UEBT Coordinator within the certificate holder also reviews any previous monitoring reports and any follow-up of corrective measure requests (if applicable). Based on the review, the UEBT Coordinator determines the scope and focus of the monitoring visit.

When determining the period of the internal inspections, the UEBT Coordinator at the certificate holder should consider, as much as possible, factors that facilitate the monitoring activities, such as harvest periods, labour-intensive periods, periods when activities of elevated risk (e.g., to health, to the environment, to product safety) take place, and other. Results of risk assessments should also be considered when determining the dates of the visits.

After reviewing all relevant information, the UEBT Coordinator at the certificate holder appoints suitable personnel to conduct the visits considering technical expertise and language skills. When necessary, a monitoring team should be assigned to assure a complete and sound monitoring visit. The process for selecting personnel and determining the time required should be documented.

The UEBT Coordinator provides clear guidance regarding the scope of the audit and points out any issues that might require special attention during the on-site visits. Prior to the visits, plans with clear objectives, dates and times, specific activities and involved persons must be prepared for every monitoring visit conducted, and be submitted to the organisations receiving the visits at least one week prior to the visit.

3.6.3 Conducting on-site monitoring

A standardized procedure for the onsite internal inspections must be in place to ensure similar levels of rigor and comparable outcomes of the visits. The procedure should clearly define the activities to be performed at each visit. The UEBT Coordinator shall ensure that all on-site internal inspections are conducted according to the procedure. The procedure should consist of, at a minimum:

1. Opening meeting to discuss the purpose, the scope and the programme of the visit.
2. Interviews with relevant people or groups, visits of relevant sites, and review of relevant documentation, to obtain sufficient, substantiated information for the purpose of the assessment.
3. Closing meeting to discuss the findings, consequences, corrective measures and next steps.

The UEBT Coordinator is responsible for ensuring that the personnel are trained in these procedures and that the procedures are followed for every monitoring visit conducted for the purpose of certification.

3.6.4 Reporting on on-site internal inspections

Standardized requirements for reporting on onsite internal inspections must be in place to ensure that the reports are sufficiently informative, comprehensive and that they allow for effective review and evaluation by the third-party certification body.

The UEBT Coordinator within the certificate holder shall ensure that all monitoring reports meet a set of established requirements for reporting, which should include at a minimum:

1. Reporting is done via the UEBT Field checklist (or equivalent if applicable).
2. The reports provide sufficient information for a reader to understand the context and reasons for the scores and main findings. This is particularly important for cases of critical or problematic findings.
3. The reports contain scores.
4. All non-conformities and the reasons for these are written in the report.

5. If non-conformities are found, the report states if and what corrective measures have been discussed and agreed upon with the monitored organisation, sub supplier or field operator.
6. Report includes an overview of activities performed during the visit by completing the form “General Information about the internal inspections.”
7. Evidence to support the monitoring results must be requested whenever considered relevant/necessary and be submitted together with the report. The relevance of documented evidence must be determined on a case-by-case basis. Generally, any critical, ambiguous, doubtful or problematic finding should be supported by documented evidence.
8. The report is submitted to the UEBT Coordinator within the certificate holder no later than one month after completion of the visit.

All monitoring personnel should be trained in these requirements. The UEBT Coordinator reviews the reports to make sure that all reporting requirements have been met. If any information is incomplete, inconsistent or unclear, the UEBT Coordinator will request that the person having conducted the monitoring visit to submit additional information or to make the necessary corrections.

3.6.5 Requesting corrective measures following on-site internal inspections

The UEBT certificate holder may allow the organisation at source, sub-suppliers and field operators to undertake corrective measures to achieve compliance, provided that the nature of the concerned non-conformity does not put the integrity or credibility of the system at risk or represent a major breach of trust. In these cases, substantiated evidence supported by documental proof or on-site follow-up visits must be in place to approve the corrective measures and confirm the compliant status. All proof of corrective measures must be documented.

The UEBT Coordinator or the monitoring person determines, for each of the non-conformities identified, and in agreement with the organisation at source, sub-suppliers and field operators which corrective measures must be put in place to reach the status of ‘compliant.’

The UEBT Coordinator requires the organisation at source, sub-suppliers and field operators to implement the corrective measures within a specified time frame. The time frames must be set as short as possible and should in general not exceed the period of three (3) months after the monitoring visit. In exceptional cases the deadline may be extended to six (6) months.

Any exceptions must be justified and documented. In no case may the organisation at source, sub-suppliers and field operators be given the status of ‘compliant’ nor may the natural raw material or ingredient of the respective organisation be sold as certified before the corrective measure(s) have been implemented and confirmed as sufficiently fulfilled.

A compliance decision is made once the corrective measures have been implemented and proof of compliance is in place. The UEBT Coordinator within the certificate holder decides whether the documented proof is sufficient or if a

follow-up on-site visit is required to confirm the measures, and the certificate holder informs the organisation at source, sub-suppliers and Filed Operators accordingly. The UEBT Coordinator must also confirm that the corrective measures are sufficient to raise the overall score of the organisation to a level of compliance according to the UEBT scoring system.

Once compliance has been confirmed, the organisation at source, sub-suppliers and field operators may be approved to be part of the certificate. The UEBT Coordinator must ensure that the person(s) in charge of purchasing within the UEBT certificate holder and any other relevant person / department is informed in due time about the “Compliant” status of the organisation at source, sub-suppliers and field operators following the corrective measures review.

Proof of corrective evidence and resulting compliance decisions must be documented.

3.6.6 Making compliance decisions

The certificate holder shall ensure that compliance decisions are made in a timely manner following the on-site internal inspections. Compliance decisions shall be made by at least two people of the certificate holder who are familiar with the requirements of UEBT certification.

The UEBT Coordinator within the certificate holder makes the compliance decisions together with at least one other person.³ Both parties need to agree on the compliance decision. If a consensus cannot be reached, the judgment of the UEBT Coordinator shall prevail for the decision.

In all cases, compliance decisions must be made in a consistent manner, following the UEBT scoring rules (or equivalent) and based on complete and verifiable information.

An organisation at source and sub-supplier/field operators can be given the status of ‘compliant’ for the purpose of the UEBT Certification if they reach the minimum score established by the UEBT Scoring System⁴ (or equivalent⁵).

Compliance decisions are made at the latest three months after completion of the monitoring visit. In exceptional cases the deadline for a decision can be extended to six (6) months. Any exceptions regarding the deadline are justified and documented.

The decision-making process must be clearly documented in such way that it allows a third-party certification body to review and reproduce the process leading to the decision. In this context, special attention is given to critical decisions or those where consensus could not be reached.

The final decision on compliance must be communicated to the person(s) within the certificate holder in charge of purchasing and all other relevant people and/or

³ For the IMS, the second person may be the monitor who has conducted the on-site visit.

⁴ See Annex 7 for a description of scoring.

⁵ See section 3.4 on equivalency.

departments with clear indication of the implications related to the decision. Decisions leading to a status of 'not compliant' imply that the organisation at source, sub-suppliers / field operators may not sell their natural raw material to the UEBT certificate holder as certified and must be clearly communicated as such to all relevant parties.

3.6.7 Implementing local monitoring systems for complex supply chains

The purpose of a local monitoring system (LMS) in an IMS setup is to take over monitoring functions and performing monitoring activities complementary to those performed by internal monitoring personnel of the certificate holder and external auditors such as certification bodies.

An LMS is mandatory to be established by the organisation at source in the following cases:

- Supply chains working on wild collection production systems.
- Cultivation supply chains where the level of complexity is high due to high risk level in the risk assessment and/or many farmers⁶.

The certificate holder selects and appoints a qualified person (Local Coordinator at Source), who is responsible for establishing and operating the LMS at level of the organisation at source. The Local Coordinator at Source defines, the rules and procedures for the local monitoring activities. In minimum, the LMS must ensure that:

- There is a systematised approach for performing on-site internal inspections of the field operators, farms, collection areas, sub-suppliers and other organisations involved in the cultivating, collecting or sourcing of the natural raw material. The process and the outcomes of the internal inspections as well as any measures resulting from monitoring activities should be documented and kept on file.
- The monitoring activities cover all relevant requirements from the UEBT standard that are applicable to the respective level within the supply chain, e.g., some requirements might pertain only to the level of the field operators or only to the certificate holder and their circumstances. These details as to which requirements are applicable to which level of entity in the supply chain, can be found in the UEBT Field Checklist (or UEBT/Rainforest Alliance Field Checklist for the Herbs & Spices Programme).
- The frequency and scope of the internal inspections correspond to those established by this document. For the details on specific rules on scope for the different setups, see Annex I.
- Prior to the internal inspections, plans for visits are made with an indication of the objective, dates and times, specific activities and involved persons. These plans are prepared for every monitoring visit conducted and agreed

⁶ Generally, more than 30 farmers would require an LMS. Contact UEBT to discuss your situation.

(verbally) with any sub-suppliers or field operators (e.g., farmers, pickers, collectors) at the least one week prior to the visit.

- A standardized procedure for the internal inspections must be in place. The procedure should define the activities to be performed at each visit. The personnel conducting the internal inspections should have the necessary skills and have received the necessary training to conduct the visit.
- Reporting is done in a way to cover all relevant standard requirements that are applicable to the respective supply chain level and circumstances. The level of formality of such reports for this setup depends on local realities and structures.
- The corrective actions for improvements or non-conformities identified during the internal inspections are implemented accordingly, and within three (3) months but not longer than six (6) months when these are non-conformities with the most important (called 'critical') requirements.
- The organization at sourcing implementing the LMS shall have established procedures for resolving disputes concerning the UEBT certification programme. The certificate holder shall make every attempt to settle disputes with other organisations or entities that are part of the LMS in an amicable manner and to the mutual satisfaction of all parties involved.
- The organization at sourcing implementing the LMS ensures that sub-suppliers and field operators participating in the UEBT certification programme agree to receive investigative audits. These are deeper internal inspections that are scheduled when non-conformances are discovered. This can be verbally agreed upon. The organization at sourcing implementing the LMS determines if and which sub-suppliers/field operators require(s) investigative audits.

The Local Coordinator at Source must ensure that the defined rules and procedures for the LMS are met and performed accordingly. It is further the responsibility of the Local Coordinator to ensure that all relevant information regarding the monitoring activities, in particular relevant findings (non-conformities) and any issues that might compromise the 'compliant' status of the organisation at source and sub-suppliers/field operators, are communicated to the UEBT Coordinator within the certificate holder proactively and in a timely manner.

For practical reasons, the LMS may be integrated in the same organisation at source managing the sub-suppliers/field operators, i.e., the tasks of the Local Manager and Local Coordinator at Source may coincide in one person or department. In this case, the organisation must undertake all possible measures to avoid any conflict of interest when fulfilling these tasks. Ideally, the person(s) conducting the monitoring activities should not be the same as the person(s) directly advising the field operators. If this is not possible, other measures, such as a rotation scheme, peer review, systematized quality controls of the internal inspections, or other measures should be introduced to minimize the risks related with conflicts of interest.

3.6.8 Investigative audits

The UEBT certificate holder must have the right to conduct investigative audits at selected organisations at source, sub-suppliers and field operators if considered necessary based on risk assessments, suspicion, or any indication that may be considered a risk to the integrity of the UEBT Certification system. The parties participating in the certification programme agree to this rule with the UEBT certificate holder.

The UEBT Coordinator within the certificate holder ensures that organisations at source participating in the UEBT certification programme agree to this rule in writing. The UEBT Coordinator determines if and which organisation(s) at source require(s) investigative audits.

3.7 Roles and Responsibilities

UEBT Coordinator within the certificate holder

In charge of all administrative and management aspects related to UEBT Certification in general and the IMS. The UEBT Coordinator within the certificate holder shall be appointed by and report directly to Senior Management and be trained for the role. They may or may not be the same person who is the focal point to UEBT on membership issues. This person should be made known to UEBT and confirm to UEBT that this person complies with the profile of the role (see Annex 2).

Monitoring personnel within the certificate holder

Ensures the credible and effective operation of the IMS. Guarantees ongoing and regular monitoring activities of the organisations at source and/or sub-suppliers/field operators. Reports to and are accountable to the UEBT Coordinator. These personnel receive training for the role. See more in Annex 3.

Local Coordinator or Manager at Source

When an LMS is used, a Local Coordinator oversees it. The Local Coordinator shall be appointed by and report directly to Senior Management of the organisation at source and will oversee the coordination and communication related to the IMS.

Together with the senior management of the source organisation, the UEBT Coordinator within the certificate holder considers a qualified and reliable staff person at source level to act as the Local Coordinator. Senior management confirms the roles and responsibilities of the local Coordinator as set out in Annex 4 and provides evidence that the appointed person has the respective qualifications.

Conflict of Interest of Personnel

The UEBT certificate holder shall request that all personnel declare any conflict of interest within the supply chain. All personnel (employed staff and external

consultants) involved in the UEBT certification programme and the IMS proactively sign a statement declaring any situation known to them that may present them with a conflict of interest regarding any organisation or person participating in this Programme.

4. The external certification audit

The external audit refers to a third-party certification system to check the transparency, reliability and integrity of the internal monitoring system and its elements. Its main purpose is to confirm that the internal monitoring system is functioning well and that all supply chains have been accurately assessed against the requirements of the UEBT Standard.

Organisations seeking certification must contract the services of a UEBT-approved Certification Body⁷ to conduct external audits at their own organisation, as well as at relevant suppliers, sub-suppliers and field operators. The referred certification bodies are formally qualified by UEBT. A list of qualified certification bodies is available in UEBT's website.

Scope of the external audit

The scope of the external certification audit is determined by the scope of the internal monitoring system. External audits take place at the UEBT certificate holder level for the purpose of assessing the quality and management of the internal monitoring system. The external audit also consists of spot-checks of the supply chains for the purpose of:

1. assessing the functioning of the internal monitoring system in these supply chains,
2. confirming that there are sufficient thresholds of compliance for certification at all levels of the supply chain,
3. confirming compliance with the UEBT requirements throughout the supply chains, including with any involved service providers.

The scope of the external certification audit depends on the level of conformity determined by the internal monitoring system and its degree of accuracy, which is established by the external certification audits over time.

For more information on the requirements and obligations of qualified certification bodies, see the UEBT web site.

⁷ See list of approved certification bodies in UEBT website.

5. Monitoring and evaluation data

Certificate holders shall collect data to monitor the scale of the implementation of the UEBT Ethical BioTrade practices along their supply chains as well as assess their progress and outputs. This is done by setting up a Monitoring and Evaluation (M&E) system and making some data available to the external auditor before the audit takes place (usually about one month before the external certification audit).

This is required for both the UEBT ingredient certification programme and for the UEBT / Rainforest Alliance Herbs & Spices Programme

For companies not located in sourcing areas and with full internal monitoring systems, UEBT requires the setup of an M&E system that includes:

- the data that will be monitored and evaluated,
- the procedures and responsibilities for data collection and reporting,
- periodic review of the M&E system to adapt it to relevant changes in the company (e.g., new supply chains included in the certification programme or sustainability strategies, new priorities or targets),
- ensuring that at least the natural raw material supply chains included in the scope of the certification are included the M&E system – these should also include countries where they are cultivated or collected.

The aspects to be monitored and evaluated shall be defined to ensure that they cover at least the reach and scale data as per ‘Scope’ form in the UEBT Field Checklist (or the UEBT/Rainforest Alliance Consolidated Field Checklist for the Herbs & Spices Programme)

Reach and Scale data
Name of natural raw material
Plant name
Type of certification/verification applied
Name of the country of cultivation/wild collection of the plant
Name of organisation at source (local supplier)
Type of production system
Number of sub-suppliers (if applicable)
Number of farms
Number of farmers
Number of wild collectors/farm workers
Size of sourcing areas (ha)
Productivity (metric ton/hectares)
Volumes of natural raw material used (metric ton)
Conversion rate (If applicable)
Volume of plant or natural ingredient sold as certified by Certificate Holder since the last audit until now (metric ton)
Expected certifiable volumes of plant or natural ingredient to be produced by the supplier (metric ton)
Expected volumes of plant or natural ingredient to be purchased by Certificate Holders as certified (metric ton)

The procedures for data collection and reporting shall ensure that information needed to fill out the 'scope' form in the UEBT Field Checklist (or the UEBT/Rainforest Alliance Consolidated Field Checklist for the Herbs & Spices Programme) are available to UEBT and the external auditor (certification body) at least one month before the external certification audit takes place. Moreover, the information shall be complete and reliable. On-site visits can be used to collect information and/or to assess its accuracy. It is recommended that the information is made available to relevant staff at the certificate holder for internal learning. The information, or a summary, can be made available publicly or to selected stakeholders (e.g., clients) for external communication.

As far as the responsibilities for data collection and reporting are concerned, they can be attributed to the monitoring personnel at the certificate holder or the certificate holder can request that organisations at source or sub-suppliers collect and submit the data.

5.1 Impact evaluations

For certificate holders that are companies not located at source with full internal monitoring systems, these companies shall ensure that the impact of practices on people and biodiversity is evaluated in the areas where certified ingredients (natural raw materials) are cultivated or collected. Areas of impact defined by UEBT in the UEBT Theory of Change (Annex 9) and the UEBT Research Agenda (available upon request) can be taken into consideration when defining the impact to be evaluated.

UEBT requires that at least one impact study every three years is conducted, and these studies should include one or more of the certified ingredient supply chains. In case of large number of certified ingredient supply chains, UEBT recommends more than one study every three years. The study results are to be made available to UEBT and to company staff for internal learning. The study results, or a summary, may be made publicly available for external communication.

For the impact studies, it is preferable that they are implemented by external and independent organisations with knowledge of the contexts to be studied.

6. Key terms

Certificate Holder: The company or organisation that holds the UEBT certificate and manages the certification. They could be a buying or processing company, individual farm of any size, farmer group or a cooperative.

Certification Body: Legal or administrative entity that has the specific tasks to conduct independent audits and to issue certification recommendations (adapted from ISO/IEC Guide 2:2004) and that is duly qualified by UEBT.

External Audits: Inspections conducted by third-party auditors at the UEBT Member, organisations at source and field operators for the purpose of assessing their compliance with the UEBT Protocol for Certificate Holders and the Ethical BioTrade Standard requirements.

Field Operators: Operators at primary production level that are part of the UEBT certification programme and that are subject to internal inspections and external audit control visits to confirm compliance with the Ethical BioTrade Standard requirements. Field operators may be a single individual or a group of individuals that follow same values and practices and that can therefore be considered a unit for the purpose of monitoring and auditing. They can be farmers, workers, pickers, collectors etc.

Ingredient: For the UEBT certification and external communications, an ingredient from biodiversity is the same as a natural raw material that is cultivated or collected. It is a material that is in its raw form or has undergone simple physical processing, which has been approved for certification under the UEBT certification programme.

Internal inspections: Visits to organisations at source and field operators conducted by monitoring personnel of the IMS for the purpose of assessing their compliance with the UEBT requirements.

Internal Monitoring System (IMS): System established by the certificate holder for assessing and monitoring supply chains to ensure that these comply with the UEBT requirements.

Local Coordinator at Source: Person appointed at Source who is responsible for the Local Monitoring System at source level.

Local Manager at Source: Person appointed at the organisation at source who is responsible for the administration related to UEBT Certification at the source level.

Local Monitoring System (LMS): Systems established at local level that complement the monitoring activities of the IMS of the certificate holder.

Manipulate (Ingredients): Pack/re-pack, process, or alter the ingredient in any way.

Monitor(s) or monitoring personnel: Person(s) appointed by the certificate holder for conducting internal inspections and assessments of suppliers that are part of the UEBT Certification.

Monitoring activities: All activities conducted by the IMS personnel or the Local monitoring personnel as part of the Internal Monitoring System of the UEBT Member.

UEBT member: A company that has joined UEBT and made commitments in how it will improve the ethical sourcing of its ingredients from biodiversity in line with the UEBT standard. Individual farms and cooperatives or smaller local companies do not have to become UEBT members to apply to be a certificate holder. Once they achieve certification, they will automatically qualify for UEBT membership. Larger companies that are not organisations at source need to apply for UEBT membership before they may apply for the ingredient certification programme.

Organisation at Source: The organisation or unit that manages the cultivation and/or collection activities of the natural raw materials to be certified. They are directly responsible for ensuring compliance with the UEBT Ethical BioTrade Standard requirements applicable to them (management system requirements), and, directly or indirectly, for those applicable to the field operators (field level requirements) that they manage.

Source: Area/region from which the specific natural raw material is sourced (i.e., cultivation/collection area).

Supply Chain: Consists of a specific natural raw material sourced from a specific field operator or group of field operators (farms, group of collectors, etc.) that are managed by a specific organisation at source.

Systematic failure: is a reproducible type of failure of the system, due to not well-designed controls and monitoring measures.

UEBT Coordinator: Person at the certificate holder level who is authorized and responsible to implement the internal monitoring system for supply chains.

Annex 1: Specific rules for annual sampling when implementing the onsite audits

Setup variations	organisation at source	sub-suppliers (if applicable)	field operators - group	field operators - individual	Onsite audit report checks
Internal monitoring system (IMS) with regular onsite internal inspections (organisation at source without local monitoring system - LMS)	certificate holder 100% certification body $\sqrt{+1}$	certificate holder 100% certification body 50%	certificate holder 100% of the groups every year + a representative sample of individual field operators and 100% of the individual field operators within 3 years max (for cultivation) certification body spot checks, but at least 50% of the groups of field operators	certificate holder 100% certification body spot checks	certification body checks $\sqrt{+1}$ of IMS inspection reports (at level of the certificate holder) to check the quality of the IMS
Internal monitoring system with regular onsite internal inspections (organisation at source with local monitoring systems)	certificate holder 100% certification body $\sqrt{+1}$	organisation at source 100% certificate holder 50% certification body $\sqrt{+1}$	organisation at source 100% of the groups every year + a representative sample ⁸ of individual field operators and 100% of the individual field operators within 3 years max (for cultivation) certificate holder 50% of the groups and spot check of representative number of individual field operators withing the sampled groups certification body spot checks, but at least $\sqrt{+1}$ of the groups of field operators and spot check of representative number of individual	organisation at source 100% certificate holder spot checks a representative number of field operators certification body spot checks a representative number of field operators	certificate holder checks $\sqrt{+1}$ of LMS reports (at level of the organisation at source) to check the quality of the LMS certification body checks $\sqrt{+1}$ of IMS inspection reports (at level of the certificate holder) to check the quality of the IMS certification body checks $\sqrt{+1}$ of LMS reports (at

⁸ Representative number could be determined using $\sqrt{+1}$ method or any other method to be determined by the auditor

Setup variations	organisation at source	sub-suppliers (if applicable)	field operators - group	field operators - individual	Onsite audit report checks
			field operators within the sampled groups		level of the organisation at source) to check the quality of the LMS during the spot checks
IMS with outsourced onsite inspections (organisation at source without local monitoring system)	certification body 100%	certification body 100%	certification body 100% of the groups every year + a representative sample of individual field operators and 100% of the individual field operators within 3 years max (for cultivation)	certification body 100%	N/A
IMS with outsourced onsite inspections (organisation at source with local monitoring system)	certification body 100%	organisation at source 100% certification body 50%	organisation at source 100% of the groups every year + a representative sample of individual field operators and 100% of the individual field operators within 3 years max (for cultivation) certification body spot checks, but at least 50% of the groups of field operators and spot check of representative number of individual field operations withing the sampled groups	organisation at source 100% certification body spot checks a representative number of the individual field operators	certification body checks $\sqrt{+1}$ of LMS reports (at level of the organisation at source) to check the quality of the LMS

* Some sample sizes can be reduced based on risk assessments

Annex 2: Profile of the UEBT Coordinator within the certificate holder

Qualification requirements

The person eligible for the position of UEBT Coordinator within the certificate holder must:

- Be familiar with different cultures
- Be knowledgeable about ethical sourcing practices
- Have successfully completed the UEBT E-Training course and respective tests and case studies when applicable
- Have attended at least one complementary UEBT training provided by a UEBT staff
- Have attended at least one training in environmental and/or social auditing
- Be familiar with auditing/monitoring requirements

Roles and Responsibilities

- Act as primary contact between the certificate holder and UEBT
- Implement and operate the IMS
- Guarantee the credible operation of the IMS
- Ensure that external audits will be conducted in a timely and efficient manner
- Ensure that the certificate holder abides by all laws and regulations in general and ABS requirements in particular
- Proactively communicate with UEBT on issues that concern:
 - > **Changes** to the standard, checklist, rules, procedures, contact person(s) and other that affect the performance of the IMS and that have implications on the UEBT Certification.
 - > **Inclusions** of new supply chains to an existing certification.
 - > Matters concerning compliance with the Standard that could represent **a major risk** to the UEBT certification programme, a systematic problem/challenge, or for which there are doubts on how to deal with them.
- Ensure adequate allocation of resources
- Safeguard that the certificate holder's internal standards and/or management system meets or exceeds UEBT requirements

- Document all activities related to the sound operation of the IMS
- Ensure adequate record keeping of above activities to demonstrate compliance
- Provide proper training of (additional) personnel involved in the IMS to ensure that they are knowledgeable about UEBT requirements.
- Appoint reliable personnel at the Organisation(s) at Source acting as Local Coordinator(s) at Source to ensure system compliance
- Organize the on-site monitoring activities
- Follow-up of Corrective Measures
- Coordinate external audits at certificate holder and respective certified supply chain(s)

Annex 3: Profile of the monitoring personnel

Qualification requirements of Internal Monitors:

Internal Monitors must

- Be familiar with different cultures
- Be knowledgeable about ethical sourcing practices
- Be experienced in auditing/monitoring activities
- Be familiar with the UEBT Ethical BioTrade Standard
- Have attended at least one training in environmental and/or social auditing
- Attend regular UEBT training related to standard requirements
- Roles and Responsibilities:
- Conduct on-site verification audits
- Monitor the effective functioning of the management system of the operation at source
- Ensure that the management system requirements comply with UEBT requirements
- Identify any non-compliance issues at sub-supplier/field operator level and their suppliers (if applicable)
- Complete the UEBT Field Checklist or UEBT/Rainforest Alliance Consolidated Field Checklist (for the UEBT/RA Herbs & Spices Programme) and submit it to the UEBT coordinator in a timely manner
- Request supportive evidence where necessary
- Inspect the relevant documentation by and at the sub-supplier/field operator level
- Ensure that the record keeping is up-to-date and complete
- Monitor that corrective measures are implemented within the allocated time (If applicable)

Annex 4: Profiles of Local Managers and Coordinators at Source

Local Manager at Source

Qualification requirements:

The person eligible for the position of Local Manager must:

- Be familiar with local cultures and environmental conditions
- Have working experience with the production/sourcing of the natural raw material(s) subject to the UEBT Certification
- Be knowledgeable about the ethical sourcing practices according to the UEBT Ethical BioTrade Standard and the UEBT certification programme

Roles and Responsibilities:

- Act as primary contact between the organisation at source, the UEBT Coordinator within the certificate holder and (if necessary) with UEBT staff
- Manage and monitor sub-suppliers/ field operators with regards to the Ethical BioTrade Standard requirements applicable to them (field level requirements). This may entail providing/coordinating training and awareness raising events, technical advice, conducting monitoring visits, providing necessary resources, following up on non-conformities and ensuring that corrective measures are implemented in line with the established measures and timelines
- Coordinate the necessary activities at the level of the organisation at source to ensure compliance with the Ethical BioTrade Standard requirements applicable to them (management system requirements)
- Facilitate and ensure timely access of Internal Monitors and external auditors to all persons, organisations and locations involved in the sourcing
- Ensure that all relevant local personnel are familiar with the requirements in the UEBT Ethical BioTrade Standard
- Ensure compliance with the Ethical BioTrade Standard requirements, both at the level of the organisation at source and field operator level
- Document of all activities related to the implementation of the Ethical BioTrade Standard requirements (management system and field level requirements, when applicable)
- Ensure adequate record keeping of above activities to demonstrate compliance
- Ensure that additional personnel are trained in the UEBT Ethical BioTrade Standard

- Facilitate the internal inspections at Source
- Facilitate external audits at Source
- Ensure that sufficient resources are available for fulfilling the tasks

Local Coordinator at Source

Qualification requirements:

The person eligible for the position of Local Coordinator must

- Be familiar with local cultures and environmental conditions
- Be knowledgeable about ethical sourcing practices
- Demonstrate technical knowledge and expertise to conduct on-site verification visits
- The Local Coordinator at Source must participate in regular training related to the IMS as part of UEBT certification programme

Roles and Responsibilities:

- Assist in the implementation and operation of the IMS at Source by coordinating the implementation of the Local Monitoring System
- Guarantee the credible operation of the Local Monitoring System
- Ensure timely access of Internal Monitors (if required) and external auditors to all persons, organisations and locations involved in the sourcing.
- Ensure that all relevant local personnel are familiar of the requirements in the UEBT Ethical BioTrade Standard
- Ensure that all relevant information (monitoring reports, communication, relevant evidence) is documented; and ensure that important information related to the sourcing of the natural raw material(s) subject to certification, in that which may compromise the “compliant” status of the organisation at source or a field operator, is communicated to the UEBT Coordinator at Member in a timely manner
- Document all activities related to the sound operation of the IMS at source level
- Ensure adequate record keeping of above activities to demonstrate compliance
- Ensure that all relevant personnel are trained in the UEBT Ethical BioTrade Standard requirements
- Facilitate internal inspections at source
- Facilitate external audits at source
- Ensure that sufficient resources are available for fulfilling the tasks

Annex 5: Traceability requirements for companies

Product traceability is a critical requirement for the UEBT Certification. The certificate holder must have a system in place to ensure that all natural raw material(s) subject to certification can be traced from the source of origin all the way through the UEBT certificate holder to its client.

Specifically, all the following traceability requirements will usually apply (see more in UEBT guidance on this subject and what are the basic requirements versus requirements for more complex supply chains, available in the UEBT resources pages on the UEBT web site):

1. The certificate holder has a documented overview of the traceability system, which describes the procedures and record keeping process and the level of traceability⁹ applied.
2. The traceability procedure also has clear roles and responsibilities.
3. There is documented information about each of the specific supply chains, including all stages of the production and transformation process. Critical control points for ensuring traceability of the natural raw materials are identified for each of the supply chains.
4. The certificate holder has established procedures to assess compliance with the traceability requirements at each of the critical control points.
5. There is a product identification system (coding system) in place for the natural raw materials under the certification that allows tracing the of the material back to the producer/supplier. *If organisations at source supply products originating from both certified and not certified field operators, then the system ensure that natural raw materials can be traced back to the level of the field operator.*
6. The certificate holder keeps records of the sales/purchase documents related to the natural raw materials under the certification, including information of the producer/supplier, volumes, varieties, qualities, area of cultivation/collection (if relevant), date of delivery and other relevant information. The documents can be linked to the respective producer/supplier.
7. There is a system in place that assures, verifies and monitors that:
 - > All products being sold as certified are indeed sourced from producers/suppliers included in the certification.
 - > Volumes of natural raw materials sold as certified are never higher than the volumes supplied by the producers/suppliers under the certification.
8. If the natural raw materials are processed / transformed in any way that affects the volumes, information is available on the conversion rates and

⁹ Identity Preserved (IP), segregation, or other.

volumes before and after completion of the process. This applies to any stage in the supply chain.

9. If the organisation sources natural raw material from producers that are not part of the certification programme, then:
 - > There is a way to distinguish between (UEBT) certified and non-certified ingredients in the sales/purchase documents.
 - > There is a way to ensure that certified and non-certified ingredients are kept/handled separately in all stages of the sourcing and production process.
10. If services are outsourced to a service provider (i.e., for processing, transportation, storage) anywhere in the supply chain, there is a system in place that ensures that the natural raw materials remain traceable and that mixing with non-certified materials does not occur. Proof of compliance with the traceability requirements by the outsourced service provider is documented.
11. Ingredients that are sold as certified by the certificate holder are only those sourced from the suppliers that have been approved for certification and did not have a 'suspended' status due to non-conformities, breaches of contract, or other at the moment of purchase.
12. The certificate holder makes available to the certification body during the external audit an overview of the total annual volumes of certified natural raw material (per material) received, still in stock and the total volumes (per material) sold as certified.

Additional changes to some of the requirements above may apply depending on the claims being made with the certification.

Annex 6: Assessing Access & Benefit Sharing (ABS)

Sourcing natural raw materials - whether dried plants for cosmetics extracts, essential oils for fragrance compositions or herbs and spices for foods and beverages - may be subject to legal requirements on access and benefit sharing (ABS). ABS requirements are established by national laws and regulations, which implement international agreements such as the Convention on Biological Diversity and the Nagoya Protocol.

How is ABS assessed as part of the UEFT ingredient certification programme?

The ABS assessment in the UEFT certification programme (including in the UEFT / Rainforest Alliance Herbs & Spices Programme) evaluates whether ABS requirements apply to the natural raw material (ingredient) to be certified and, if so, whether adequate measures for compliance have been taken. The approach to the ABS assessment varies, based on whether ABS requirements are in place in the country of cultivation or wild collection and on the likelihood of supply chain activities triggering such requirements.

- If the country of cultivation or wild collection does not have ABS laws or regulations in place, no further assessment is needed for issuance of the UEFT ABS approval letter.
- If the country of cultivation or wild collection does have ABS laws or regulations in place, ABS experts at UEFT look at the potential applicability to the natural raw material to be certified. For certain countries and supply chains, ABS experts at UEFT may need information on potential uses of the natural raw material to be certified in research or new product development.

To define whether ABS requirements apply to natural raw materials, it is necessary to look not only at cultivation or wild collection, but also at other activities along the supply chain. That is why, while the UEFT Field Checklist covers certain aspects of ABS, confirming compliance for the purposes of the UEFT ingredient certification programme requires a broader assessment (see box below). This ABS assessment is conducted by ABS experts at UEFT and involves the following steps:

1. Upon registering the certification audit in the UEFT online system 'Grove', UEFT launches the ABS assessment. For this purpose, it may request additional information or clarification from the potential UEFT certificate holder.
2. ABS experts at UEFT conduct the ABS assessment, identifying whether ABS requirements apply to the natural raw material to be certified and, if so, whether adequate measures for compliance have been taken. UEFT issues a letter outlining the findings of the ABS assessment and sends this ABS approval letter to the potential certificate holder.
3. Potential certificate holder shows UEFT ABS approval letter to the third-party auditor, as part of the certification audit. It is the responsibility of the person coordinating the certification process within the organisation that will be the potential certificate holder to ensure that the ABS approval letter is available and up to date during the audit.

Annex 7: Description of the UEBT Scoring System

The UEBT Scoring System is an integral part of the UEBT System Checklist (a document used by auditors) as well as the UEBT Field Checklist. It sets the rules for quantifying the results of audits and establishes the minimum levels of compliance required for certification.

Scoring Options

The UEBT Scoring System is based on the following scoring options:

Score	Description	Explanation
N/A	Not Applicable	The indicator is not applicable to the specific situation
0	Not fulfilled	Measures required by the indicator are not in place. Improvement is required.
1	Partially fulfilled (insufficient): Improvement needed	Measures have been taken towards compliance with the indicator, but these measures are not yet sufficient for compliance Improvement is required.
2	Partially fulfilled (sufficient): Improvement possible	Measures have been taken towards compliance with the indicator. Though improvement is possible, the measures are enough to find compliance with the indicator Improvements are recommended.
3	Fulfilled	Measures have been taken towards compliance with the indicator, which fully satisfy its requirements

Whereas:

- A score 0 or 1 means that the verifier is **not complied**
- A score 2 or 3 means that the verifier is **complied**

Relevance

Importance	Definition / Explanation
Minimum requirements	Compliance is always required for indicators that constitute a minimum requirement. For instance, companies and organisations must comply with these requirements before obtaining UEBT membership.
Critical	Critical indicators are considered essential Ethical BioTrade practices. For instance, compliance is required to receive or maintain UEBT certification of ingredients. In the verification of UEBT members or specific supply chains, non-compliance with these indicators must be addressed with priority.
Critical stepwise	For critical stepwise indicators, additional time for compliance is provided. Compliance with these indicators must be achieved in a maximum of three years.
Regular	Regular indicators are focused on promoting positive impact and allow more flexibility in their implementation. For example, UEBT certification of ingredients requires compliance with a certain number of these indicators.
Regular stepwise	For regular stepwise indicators, additional time for compliance is provided. After three years, these indicators are considered to have “regular” level of importance.

Threshold for Certification

A) UEBT Field Checklist

To be eligible for certification, supply chain must have showed the following:

- 100% of the checklist to be audited since the first year, including stepwise approach indicators
- 0 noncompliance with Minimum and Critical and Critical Stepwise requirements applicable to the specific year of certification
- 90% of the total applicable standard for the specific year need to comply (score 2 or more)

Compliance with Critical stepwise are counted as an acknowledgement of existing efforts to the final score at any time. Non-conformities with Critical stepwise not applicable for the specific year are not counted as non-conformance.

B) UEBT System Checklist

To be eligible for certification, the UEBT certificate holder must be compliant with all critical control points of the UEBT System Checklist (used by auditors). Regular control points that are not complied must be addressed by the within 3 years maximum.

Annex 8: Cancellation or suspension

Cancellation

UEBT may cancel a certificate for the following reasons:

- The CH does not complete its annual audit during the required period and thus the certificate expires
- The CH does not renew their certificate after it expires when a time extension has been granted
- There has been no closure of identified non-conformities against 'critical' criteria during the maximum time allowed
- There is non-conformity against 'minimum' criteria

In the event of cancellation of a certificate, the following steps are taken:

1. The certification body informs UEBT
2. UEBT communicates the decision and gives implications for the sale for any previously 'certified' volumes
3. The cancellation is published on the UEBT website

Suspension

UEBT will suspend a certificate for up to three months, pending investigation, for the following reasons:

- Fraud
- Bribery, intimidation or harassment of auditors
- Loss of traceability of the certified ingredient
- Issues that could jeopardize UEBT's credibility

If investigations confirm the allegation(s), this will lead to cancellation of the certificate. Otherwise, the certificate status will be restored. In the event of suspension of a certificate, the following steps are taken:

1. The certification body informs UEBT
2. UEBT communicates the decision and gives implications for the sale for any 'certified' volumes

Selling certified volumes in case of cancellation or suspension of the UEBT certificate

Certificate holders whose certificates have been suspended or cancelled are not allowed to sell product as 'certified' during the suspension period or after the cancellation.

This does not pertain to certificate holders whose certificate was voluntarily cancelled. These entities can sell off already certified volumes, but they must provide documentation of the volume of stored product to UEBT at the time of cancellation.

The remaining certified ingredient volumes can be sold as with a claim of 'certified' until they are finished, provided that the company complies with chain of custody requirements and pay 50% of the UEBT annual certification fee.

Annex 9: UEBT Theory of Change



UEBT Theory of Change



UEBT Vision

A world in which all people and biodiversity thrive



Impacts



Outcomes



Outputs



UEBT member companies, suppliers, field operators and other stakeholders

UEBT Strategies



UEBT



Updates History

Version	Author / Reviser	Date approved	Changes
July 2022	E.Badilla/T.Divney	July 2022	Under 3.1 Internal monitoring system – set up. Added: process to address systemic failures within Internal or Local Monitoring Systems



UEBT is a non-profit association that promotes sourcing with respect. Its mission is to regenerate nature and secure a better future for people through ethical sourcing of ingredients from biodiversity.

UEBT

De Ruijterkade 6, 1013 AA Amsterdam, The Netherlands
Telephone: +31 20 22 34567
Email: info@uebt.org

FINANCIAL ADMINISTRATION

p/a CR Gestion et Fiduciaire SA
Rue Mina-Audemars 3, 1204 Geneva, Switzerland

BRAZIL REPRESENTATION

Porto Alegre
Telephone: +55 51 999161702
Email: brazil@uebt.org

INDIA REPRESENTATION

Ghaziabad
Telephone: +91 981 810 1690
Email: india@uebt.org

MADAGASCAR REPRESENTATION

Antananarivo
Telephone: +00261330586161
Email: madagascar@uebt.org

VIETNAM REPRESENTATION

Hanoi
Telephone: +84 (91) 5510679
Email: vietnam@uebt.org

Connect with us

www.uebt.org

 [@EthicalBioTrade](https://twitter.com/EthicalBioTrade)

 www.linkedin.com/company/uebt

 www.youtube.com/user/UEBTgva