POLICY CERTIFICATION APPROACH FOR UTZ HAZELNUT PROGRAM IN TURKEY AND GEORGIA FOR COVID-19

JUNE 2020
### SUMMARY

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<tr>
<th>Issue Date:</th>
<th>Binding date:</th>
<th>Expiration date:</th>
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<tbody>
<tr>
<td>June 9, 2020</td>
<td>June 9, 2020</td>
<td>December 31, 2020</td>
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**Developed by:** Rainforest Alliance  
**Approved by:** Director, Standards and Assurance

**Linked to (code and name of documents, if applicable):**

UTZ related documents
- UTZ Assurance Certification protocol, version 4.3 December 2018
- UTZ Core Code of Conduct for group and multi-group certification, version 1.1 + Hazelnut Module

**Reporting to RA**

Before the on-site external audit of a Certificate Holder, the Certification Body shall inform Rainforest Alliance ([certification@ra.org](mailto:certification@ra.org)) on the percentage of internal inspections that will be completed by the Certificate Holder per period as per table 1 of this policy.

**Applicable to:**

Farm certified entities (UTZ) for the Hazelnut Program as well as Rainforest Alliance authorized Certification Bodies (CB) in Turkey and Georgia.

**Regions:**

Turkey, Georgia

**Crops:** Hazelnut  
**Type of organizations:** Farm groups
1. INTRODUCTION
Rainforest Alliance is a growing network of people who are inspired and committed to working together to achieve our mission of conserving biodiversity and ensuring sustainable livelihoods. For more information about Rainforest Alliance, visit its website: http://www.rainforest-alliance.org.

2. POLICY FOR CERTIFICATION IMPACTED BY COVID-19

2.1 JUSTIFICATION
Currently, due to travel and access restrictions to certain sites related to COVID-19, there are cases arising in some localities where it will not be possible to follow the planned schedule of internal inspections for Certificate Holders (CHs) in Turkey and Georgia. As a result, these CHs may not be able to complete internal inspections on all group members before the group’s external audit.

Rainforest Alliance through this policy therefore allows for an exception on control point G.A. 11 of the UTZ Core Code of Conduct for group and multi-group certification version 1.1, that requires internal inspections to be carried out on all group members before the group’s external audit.

This policy assumes that external on-site audits will take place during the usual Hazelnut harvest between August 1 and September 15, 2020. Information on any further exceptions or modification of this policy will be communicated before August 1, 2020.

2.2 POLICY FOR INTERNAL INSPECTION REQUIREMENT (G.A.11) FOR UTZ HAZELNUT CERTIFICATE HOLDERS

According to the Internal Inspection Requirement (G.A. 11), CHs are required to complete all internal inspections before the external audit. As per this policy, an exception to this requirement is allowed.

For cases where it is not possible to complete internal inspections on all group members before the external audit takes place due to travel and access restrictions, a percentage of the group member’s internal inspections may still be completed during the harvest as well as after the harvest.

Below table outlines the minimum percentage of internal inspections to be completed per period. In all cases, CHs shall complete internal inspections as soon as possible. CHs must complete 100% of internal inspections as specified in the table below.
Table 1: minimum percentage of internal inspections to be completed per period.

<table>
<thead>
<tr>
<th>Period</th>
<th>Minimum % of internal inspections completed</th>
<th>Detail on requirement</th>
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<tr>
<td>I) Before harvest and before external audit (until August 1, 2020)</td>
<td>50%</td>
<td>CHs must complete a minimum of 50% of the farmer group members internal inspections before receiving the external audit and before the start of the harvest.</td>
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<td>II) During harvest period and external audit (August 1 – September 15, 2020)</td>
<td>50% + 30% = 80%</td>
<td>CHs must complete an additional 30% and thus a total minimum of 80% of the farmer group members internal inspections until the end of the harvest (latest September 15, 2020).</td>
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<td>III) After harvest (September 15 – October 15, 2020)</td>
<td>50% + 30% + 20% = 100%</td>
<td>Certificate Holder must complete the internal inspections of the rest of the farmer group members (maximum 20% of group members) within 1 month after the harvest (by October 15, 2020).</td>
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The following requirements apply:

a) When requesting an Audit the CH will inform the CB on the percentage of internal inspections that will be completed in each period as per table 1.

b) For CHs that have completed 100% of internal inspections before the external audit, the normal audit and certification procedures and rules apply, according to the UTZ Assurance Certification protocol, version 4.3 December 2018.

c) If a CH did not complete the minimum requirement of 50% internal inspections prior to the external audit, the external audit cannot be performed for the 2020 harvest. This means that this CH cannot be certified against the UTZ standard for the 2020 harvest. In this case, the Rainforest Alliance audit exception policy for COVID-19 will also not be applicable.

d) Only new group members that have completed and successfully passed a physical internal inspection before the external audit can be included in this year’s certificate.

e) Internal inspections are planned according to risk. CHs shall use their risk assessment (G.A.16) to identify which farmers shall be inspected in which period. Where possible, farmers with high risk shall be inspected first. Only group members with low risk can be inspected after the harvest. The CH sends the risk assessment and justification of internal inspections per period to the CB by July 15, 2020.

f) CHs must finish 100% of the internal inspections of their intermediaries (manav, cracker) before the external audit.

g) If internal inspections have not been completed before the external audit CHs shall continue internal inspections during the external audit. The external auditor will observe the performance of the internal inspector for the duration of at least 1 audit day (inspection of a minimum of 6 farmers).

h) If a CH must complete some of the internal inspections after the external audit, a detailed report of the results of the completed internal inspections must be sent to the CB no later than 2 weeks after the last inspection. This report must include at least the non-conformities detected and closure of these non-conformities. Along with the report, a final version of the Group Member Registry must be shared with the CB.
i) The CB will review the report within 1 week following receipt and may ask for additional evidence regarding closure of the identified non-conformities. The CH shall send additional evidence within 1 week after receiving the request.

j) For non-conformities detected during the external audit, the rules and timelines in the UTZ certification protocol apply and continue to be mandatory.

k) The CB will take the certification decision within 1 week after all non-conformities identified through the final internal inspection report and the external audit have been closed.

l) If a minimum of 50% of internal inspections have been completed, the external audit has been completed and the non-conformities raised during the external audit have been closed, but the (evaluation of the) internal inspections is not yet completed, a CH may be issued a licence for 50% of the total certified volume of the 2020 harvest.

2.3 REQUIREMENTS AND TIMELINES FOR CERTIFICATION BODIES

a) CBs must follow the normal audit and certification procedures for CHs that were able to complete 100% of their internal inspections before the external audit.

b) All rules and timelines in the UTZ Assurance Certification protocol, version 4.3 December 2018 apply and continue to be mandatory.

c) The CB shall evaluate the validity of the CHs risk assessment and justifications of internal inspections per period as per table 1 of this policy.

d) At least one week before the external audit of a CH, the CB shall inform Rainforest Alliance (certification@ra.org) on the percentage of internal inspections that will be completed by the Certificate Holder in each period as per table 1.

e) If all the internal inspections have been completed before the on-site external audit, the certification process shall continue according to the rules and procedures of the UTZ Assurance Certification protocol.

f) If a percentage of internal inspections will take place during the external audit (period II), the external auditor shall observe the performance of the internal inspector for the duration of at least 1 audit day (inspection of a minimum of 6 farmers). These farmers are to be included in the external audit sample.

g) If part of the internal inspections will be completed after the on-site external audit, the CH submits a final internal inspection report (see 2.2. h). The CB reviews this report within one week after receipt and, if needed, requests additional evidence regarding closure of the non-conformities.

h) The CB takes the certification decision within 1 week after all non-conformities identified through the final internal inspection report and the external audit have been closed. The license request is submitted in MultiTrace maximum 1 week after the certification decision.

i) If a minimum 50% of internal inspections have been completed, the external audit has been completed and the non-conformities raised during the external audit have been closed, but the (evaluation of the) internal inspections is not yet completed, the CB can issue a license allocating 50% of the certified volume of the 2020 harvest of the CH. The CB shall request this volume allocation through certification@ra.org to be processed in the MultiTrace system.