



Rainforest Alliance Implementation and transition rules for existing CoC Certificate Holders, Exempted Participating Operators and Marketplace Registrants

Version 1

The Rainforest Alliance works to conserve biodiversity and ensure sustainable livelihoods by transforming land-use practices, business practices, and consumer behavior.

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Implementation and transition rules for existing CoC Certificate Holders, Exempted Participating Operators and Marketplace Registrants

The Rainforest Alliance Chain of Custody (CoC) system requires that all entities covered by its scope (Participating Operators) register in the Rainforest Alliance Marketplace and acquire CoC certification or CoC endorsement in order to use the Rainforest Alliance Certified™ seal or make claims that products originate from Rainforest Alliance Certified farms.

The Chain of Custody (CoC) Policy and the changes related to CoC in other Rainforest Alliance documents become effective on October 1st, 2015. This document describing implementation and transition rules, shall be applied in conjunction with the new CoC Policy.

- 1) All Participating Operators (POs), without an active CoC Certificate, registered in the Rainforest Alliance Marketplace as of October 1, 2015 shall complete the Chain of Custody Risk Assessment (CRA) by March 31, 2016.
- 2) POs that do not have an active exemption or CoC certificate on October 1st, 2015 will initiate a certification or endorsement cycle and apply the assurances in the CoC Policy 2015 Section 2 Table “A”.
- 3) POs with an active CoC certificate with audits programmed between July 1, 2015 and October 1, 2015 shall continue with those audits in accordance with the 2014 CoC Policy.
- 4) POs with an active CoC Certificate on October 1, 2015 will have the option to continue with the 2014 CoC Policy until March 31, 2016. After March 31, 2016 CBs will not be allowed to conduct audits to the 2014 CoC Policy.
 - a) For POs with valid certificates as of October 1, 2015, the outcome of the CRA will not initiate a new certification cycle and there will be no lapse in certification, but the PO will conduct assurances in the Transition Table below depending on where it is in its certification cycle. In order to ensure a continuous, active certificate, POs should apply for the CRA 6 months prior to the next anniversary date.

Transition Table: Assurance requirements for POs holding a valid CoC Certificate or Exemption as of October 1st, 2015

RISK LEVEL	Certification Audit	1 st Annual Audit	2 nd Annual Audit
Very low risk	No audit, endorsement issued. Complete the CRA annually		
Low risk	Desk audit	No audit	No audit
Medium risk	Desk audit	No audit	No audit
High risk	On-site audit	Desk audit	No audit

For example:

- i) If the results of the CRA indicates that the PO no longer requires certification (Very Low Risk), then the certificate may be cancelled, an endorsement issued, and the PO will be required to complete a CRA annually.
 - ii) If the result of the CRA indicates that the PO requires certification, then the existing certification cycle is continued and the assurances are followed using the Transition Table.
- b) The requirements in the Transition Table apply for 3 years. Following the 3-year transition period, CoC Policy 2015, Section 2, Table “A” shall apply, without triggering a new certification cycle. Below are a few examples:
- i) A company had its first annual audit on June 15 and per the results of the CRA, it is in the ‘High Risk’ category. Then, the assurance requirements for this company over the next six years will be:

Audit number	Type of audit	Table used as reference
2 nd annual	No audit	Transition rules
Certification	On-site audit	Transition rules
1 st annual	Desk audit	Transition rules
2 nd annual	Desk audit	Policy
Certification	On-site audit	Policy
1 st annual	On-site audit	Policy

- ii) A company had its certification audit on May and the results of the CRA show it is in the “Low Risk category. Then, the assurance requirements for this company over the next six years will be:

Audit number	Type of audit	Table used as reference
1st annual	No audit	Transition rules
2nd annual	No audit	Transition rules
Certification	Desk audit	Transition rules
1st annual	No audit	Policy
2nd annual	No audit	Policy
Certification	On-site audit	Policy

- c) POs with valid CoC Certificates shall comply with any verification audits required by the CB.
- 5) POs with a valid Small Volume Exemption as of October 1, 2015, will maintain exempted status until the next annual review, and have the CRA conducted 2 months prior to the due date for their annual review. Depending on the outcome of the CRA, a new certification or endorsement cycle will be initiated in accordance with the Transition Table.
- 6) The CoC Policy and Standard 2014 will not be in effect after March 31, 2016.
- 7) POs may continue to request Transaction Certificates for making claims and use of seal approvals while they undergo the CoC Risk Assessment (CRA) and if applicable, certification process.
- 8) The Rainforest Alliance reserves the right and holds the authority to analyse and define the interpretation of this document and decide on unforeseen cases. Furthermore, the Rainforest Alliance reserves the right to modify the content of this document at any time.