

THE CONSUMER GOODS FORUM

Sustainable Supply Chain Initiative | Primary Production Scope – Scheme Management Criteria | Comments Received from Stakeholders/Public Consultation | 26th of May 2021

Introduction.....	2
Overarching Comments.....	2
Chapter A1. Scheme Governance.....	7
Chapter A2. Scope and Objectives	10
Chapter A3. Integrity Programme	12
Chapter A4. Logo Use and Claims.....	13
Chapter A5. Standard Setting and Maintenance.....	15
Chapter B1. Accreditation	18
Chapter B2. Relationships with Audit Firms.....	21
Chapter B3. Auditor Competence	23
Chapter B4. Audit Protocol.....	33
Chapter B5. Audit Reporting	43
Chapter B6. Follow-up Action	48
Chapter B7. Data Management.....	51
Chapter C1. Smallholders (Overview)	52
Chapter D1. Group Certification (Overview)	55
Chapter D2. Group Certification (Central Function)	61
Chapter D3. Group Certification (Internal Audit Programme).....	65
D4. Group Certification (Audit Protocol).....	69
D5. Group Certification (Site-audit sampling)	71
D6. Group Certification (Follow-up Action).....	75
Anti-Trust Caution	78

Introduction

This document consists of all comments received from the stakeholders (including scheme owners, international/industry associations, NGOs, academics, and others) during the public consultation phase between September to December 2020. We held one consultation call each for scheme owners, general stakeholders and also for CGF members. CGF SSCI’s online public consultation on the Primary Production scope ended on the 1st of December 2020. We received 15 submissions on the online platform and via email.

In total, there were 67 stakeholders with who CGF SSCI consulted regarding the draft criteria among which:

- 28 are companies and service providers
- 22 are scheme owners
- 5 are foundation, independent consultant and academics
- 12 are industry/international associations, international organisations and NGOs.

The document is structured by:

- **Overarching Comments:** all comments which are not necessarily found at the criteria level but include information/suggestions from the stakeholders.
- **Overarching Comments per chapter:** all comments which are not necessarily associated to a specific criterion but relevant at the chapter level.
- **Comments per criterion:** all comments received which are associated to a specific criterion.

Should you have any questions, please contact the CGF SSCI Team at ssci@theconsumergoodsforum.com.

Overarching Comments

Theme/Summary	Stakeholder Comments	SSCI Responses
Include scheme management around audit firm business ethics	<ul style="list-style-type: none"> • No process to send alert notifications for egregious and/or sensitive issues. <ul style="list-style-type: none"> ○ Where is scheme management around audit firm business ethics? i.e. Requiring the audit firm to have their own Code of Conduct, Anti-bribery, Conflict of interest policies, procedures, and 	There are existing organisations in place, such as APSCA, that address these issues in addition to the ISO accreditation. It is a great topic of concern for SSCI members and we are exploring how our benchmark can approach these issues.

	<p>reporting process? Possible that this is embedded into the ISO standards. If not, seems to be missing.</p> <ul style="list-style-type: none"> ○ Process for follow-up questions to be answered by those using reports. 	
<p>Revisit the focus on the availability of written policies especially for small farms</p>	<ul style="list-style-type: none"> • Several criteria are extremely focused on the availability of written policies, written procedures which I consider not applicable for small to medium sized farms. Implication for us would be that we need to rule by exception i.e. explicitly take advantage of the allowance made under the Scheme Management Criteria that some requirements can be lifted for small farms. This means we might need to shift to a definition of small farm that encompasses businesses larger than our 5 workers • Suggest increasing attention to accurate record keeping. Double books and/or falsified records undermine all audit data. 	<ul style="list-style-type: none"> • Schemes can provide a number of documentation exceptions to small farms, provided that these exceptions are listed.
<p>Scheme management should reflect more about changing scheme assurance systems where there is a broader interpretation to audits</p>	<ul style="list-style-type: none"> • In our opinion there have been lots of critiques on the traditional forms of “third party audits”. And we acknowledge that in past years increased number of reflections are taking place in various schemes as well as in auditing companies re. the need to improve on quality, reliability, stakeholder involvement and costs. Increasingly schemes are using other forms “beyond audits” as well as do not solely rely on certification: they are using self-assessments, second party verification, packages of assurance mechanisms, and flexible use of various verification systems, using easy accessible digital technology for data collection, as well as risk assessment based choice of assurance methods. For reference see e.g. the recently drafted Aquaculture Stewardship Council social assessment methodology or the Sustainable Rice Platform assurance system launched in September 2020 Sustainable Rice Platform (SRP) . Or discussion in auditing 	<ul style="list-style-type: none"> • The SSCI was created to address issues first and foremost in sustainability assessments and certifications. While we recognise that other approaches exist, the benchmarking process will focus on these areas which many of our member companies still use to make responsible sourcing decisions. Alternative approaches always remain an available option to companies that use SSCI as their benchmark of choice.

	<p>firms like ELEVATE. Webinar – Cutting Through the Noise: Future of social auditing - ELEVATE (elevatelimited.com)</p> <ul style="list-style-type: none"> ○ In our opinion the scheme management benchmarking document should reflect much more these changing scheme assurance systems. At minimum this should be done in an introduction explaining the “broader” interpretation to “audits”, but in our opinion the whole document should be reviewed in this perspective 	
<p>Ensure a greater extent of the criteria</p>	<ul style="list-style-type: none"> • The second comment relates to the fact that many schemes focus their certification on producing units. Social criteria however should also apply to processing and trading companies working in the downstream value chain.....Unfortunately therefore we have seen in past years that schemes only “check” social issues at the producing and that severe human rights issues in the downstream were not identified (re. seafood sector with forced labour and migrant labour abuse). In the so-called Chain of Custody guidelines only traceability of the products is assured, not compliance with social and human rights issues. This would require additional guidelines also in this SSCI scheme management guidelines. This is of course related to the mentioned need (see above comment) on to be more specific on “human rights due diligence”. 	<ul style="list-style-type: none"> • Following the launch of this scope, the SSCI will cover both primary production and manufacturing facilities. Schemes can apply for recognition in one or both areas to ensure credibility across that value chain.
<p>Ensure clarity on how references to schemes across scopes are presented and interpreted in SSCI criteria</p>	<ul style="list-style-type: none"> • SAI Platform is supportive of the approach from SSCI to provide a comparative review and an attempt to consolidate understanding of the multiple efforts of social compliance audits such as SMETA, BSCI, and crop-specific standards, across fisheries and agriculture, and where such audits are already taking place. This will provide a common reference and removes the need for continued individual review by each company and stakeholder. We do have some concerns on how this is being presented and interpreted, and how it might be applied in the longer 	<p>The SSCI was created to address issues first and foremost in sustainability assessments and certifications. While we recognise that other approaches exist, the benchmarking process will focus on these areas which many of our member companies still use to make responsible sourcing decisions. Alternative approaches always remain an available option to companies that use SSCI as their benchmark of choice.</p>

	<p>term. We recommend that these are addressed to ensure alignment from all who look to use the SSCI going forward. The standard takes a compliance approach for delivery and is listed as for “Primary Production”. As such this implies it will be applied to standards that are applied at farm level. There is no defined limitation of scope, be it farm size, processing capability, geography or more. Many standards and schemes today, work with farmers on a continual improvement basis rather than direct compliance and have wider environmental and economic content as well as social. They will not have the depth of social focus that the SSCI is proposing and will not be able to achieve SSCI accreditation.</p> <p>We believe,</p> <ul style="list-style-type: none"> • The SSCI approach can support preventing duplication of social auditing efforts already in place • SSCI has no desire for this to be a new standard, but more to provide comparative oversight of others. • The intent of SSCI is to drive positive systematic change and this will be achieved as the SSCI itself develops and existing social compliance and sustainable farming standards progress to align. As a result, SSCI is likely to become the definition of social compliance needs for others to align on. <ul style="list-style-type: none"> ○ The likely scope for standards that fulfil the SSCI requirements is consumer facing, third party independent farm standards only. These typically apply at farm level for operations that have a strong support structure in place. 	
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Overarching Responses

All comments received are of high importance to sustainability in supply chains and to SSCI criteria from ensuring business ethics requirements on audit firms, human rights due diligence aspect within the scheme management. It is important to note that the SSCI aims to serve as a benchmark and thus setting benchmark criteria exclusively for third-party scheme/programmes. The intention is to ensure that they are at the level expected by the industry. SSCI's work is designed to encompass not only key social compliance topics that are relevant in global supply chains but also to set a baseline for how programmes are managed and run. It is therefore imperative to underline that as SSCI helps to set the baseline for credible and robust third-party programmes, SSCI is mainly a tool in the toolkit of supply chain management strategy in which the use of third-party programmes (along with the audits as mechanisms) is prevalent. This is where the SSCI aims to drive improvement and impacts.

We noted the importance of key topics such as business ethics across the Scheme Owners and the audit firms to be reflected within the scheme management part, the changing landscapes in terms of the role of digital platforms going forward, among others. We will ensure to consider this feedback in the next iteration of the criteria revision.

By the same token, transparency is of high importance for the SSCI. Therefore, in the SSCI criteria, there is a set of criteria focused on ensuring that data and records are in place, which will be checked and verified withing the SSCI Benchmark Process (e.g. via the SSCI Office Visit to the office of the Scheme Owner), which will be continuously monitored via the SSCI Continued Monitoring Alignment. The SSCI will always encourage all Scheme Owners to continue striving in their standards and management systems and will not limit, and instead encourage all efforts to aim for beyond and what is expected by the industry's expectation.

Chapter A1. Scheme Governance

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
A1.01 The Scheme Owner shall be an organisation that is a legal entity, which could be held legally responsible for the schemes' operations.	No comments received.	N/A	The Scheme Owner shall be an organisation that is a legal entity, which could be held legally responsible for the schemes' operations.
A1.02 The scheme cannot be managed or owned in whole or in part by an audit firm or group of audit firms to ensure that the scheme owner is not directly engaged in operational affairs (auditing or certification) of the programme.	No comments received.	N/A	The scheme cannot be managed or owned in whole or in part by an audit firm or group of audit firms to ensure that the scheme owner is not directly engaged in operational affairs (auditing or certification) of the programme.

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>A1.03 The Scheme Owner shall have adequate arrangements to cover liabilities arising from its operations.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall have adequate arrangements to cover liabilities arising from its operations.</p>
<p>A1.04 The Scheme Owner operates to a documented set of governance policies and procedures specifying at least the following:</p> <ul style="list-style-type: none"> - Board or governance body election or appointment process, - Board or governance body representation and Terms of Reference, - Member categories (where applicable), - Income generation or funding processes, - An organisational structure, - The decision-making processes of each governance body, - Key personnel roles (responsibility and authority), - Managing conflict of interest, and - Assurance process. 	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner operates to a documented set of governance policies and procedures specifying at least the following:</p> <ul style="list-style-type: none"> - Board or governance body election or appointment process, - Board or governance body representation and Terms of Reference, - Member categories (where applicable), - Income generation or funding processes, - An organisational structure, - The decision making processes of each governance body, - Key personnel roles (responsibility and authority), - Managing conflict of interest, and - Assurance process

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>A1.05 The Scheme Owner shall have in place a publicly available appeals and complaints resolution procedure and shall require this from approved audit firms and accreditation bodies. Each procedure shall require the respective body to:</p> <ul style="list-style-type: none"> - investigate and take appropriate action regarding relevant complaints, within defined timelines; - review and take any necessary corrective actions; and - keep a record of all complaints and resulting actions. 	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall have in place a publicly available appeals and complaints resolution procedure and shall require this from approved audit firms and accreditation bodies. Each procedure shall require the respective body to:</p> <ul style="list-style-type: none"> - investigate and take appropriate action regarding relevant complaints, within defined timelines; - review and take any necessary corrective actions; and - keep a record of all complaints and resulting actions.

Chapter A2. Scope and Objectives

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
A2.01 The Scheme Owner shall have a defined scope for auditing under its scheme.	No comments received.	N/A	The Scheme Owner shall have a defined scope for auditing under its scheme.
A2.02 If the Scheme's auditing scope includes smallholders/family farms, the Scheme owner shall have clear rules for the classification of producers as "smallholder/family farm" producers.	<ul style="list-style-type: none"> • "Suggest clarifying requirement when scheme does not differentiate application to smallholders <ul style="list-style-type: none"> ○ New wording, it should indicate "if scheme scope <u>has a differentiated application to smallholders, then...</u>" ○ If the scheme does not have a differential application of criteria to small or big holders, family farm or not family 	The current criterion is formulated to apply only for schemes that include smallholders/family farms, they are required to have clear rules for the classification of producers as "smallholder/family farm" producers. If the scheme does not have a differential application of criteria, the criterion is met by providing evidence to this point.	If the Scheme's auditing scope includes smallholders/family farms, the Scheme owner shall have clear rules for the classification of producers as "smallholder/family farm" producers.

SSCI Primary Production Draft Criteria – Comments Received
 26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	farms then it should not need to define the concept."		

Chapter A3. Integrity Programme

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
A3.01 The Scheme Owner shall have in place a clearly defined system for the approval, suspension and withdrawal of audit services by audit firms for the scope of their scheme.	No comments received.	N/A	The Scheme Owner shall have in place a clearly defined system for the approval, suspension and withdrawal of audit services by audit firms for the scope of their scheme.
A3.02 The Scheme Owner shall define procedures to monitor the performance of audit firms. The procedures shall, at a minimum, include: <ul style="list-style-type: none"> - the review of complaints - the review of audit reports - a risk-based programme of office audits and witness audits of audit firms that are approved to operate under the scheme. The monitoring of the performance may take the form of a risk-based programme, based on the region	No comments received.	N/A	The Scheme Owner shall define procedures to monitor the performance of audit firms. The procedures shall, at a minimum, include: <ul style="list-style-type: none"> - the review of complaints - the review of audit reports - a risk-based programme of office audits and witness audits of audit firms that are approved to operate under the scheme The monitoring of the performance may take the form of a risk-based programme, based on the region

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
they operate, past complaints, number, size and complexity of assessments carried out by an audit firm.			they operate, past complaints, number, size and complexity of assessments carried out by an audit firm.

Chapter A4. Logo Use and Claims

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>A4.01 The Scheme Owner shall have a publicly available policy governing use of symbols, logos and claims.</p> <p>The policy shall, at a minimum, include that symbols, logos and claims</p> <p>- are only applied to activities that are within the scope of certification/auditing,</p>	No comments received.	N/A	<p>The Scheme Owner shall have a publicly available policy governing use of symbols, logos and claims.</p> <p>The policy shall, at a minimum, include that symbols, logos and claims</p> <p>- are only applied to activities that are within the scope of certification/auditing,</p>

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<ul style="list-style-type: none"> - do not overstate or mislead users relative to the defined scope or the status of the auditee - are relevant to that scope and - the policy shall address copyright protection. 			<ul style="list-style-type: none"> - do not overstate or mislead users relative to the defined scope or the status of the auditee - are relevant to that scope and - the policy shall address copyright protection.
<p>A4.02 In the case of certification schemes, the Scheme Owner or its delegated authority issues written and enforceable authorisations and/or licenses to use the scheme’s mark/claim/logo only when the facility and/or product has been audited as being in conformity with the relevant standard.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>In the case of certification schemes, the Scheme Owner or its delegated authority issues written and enforceable authorisations and/or licenses to use the scheme’s mark/claim/logo only when the facility and/or product has been audited as being in conformity with the relevant standard.</p>

Chapter A5. Standard Setting and Maintenance

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
A5.01 The Scheme Owner shall have a document control procedure in place to ensure that all of the scheme’s normative documents are appropriately controlled and publicly available.	No comments received.	N/A	The Scheme Owner shall have a document control procedure in place to ensure that all of the scheme’s normative documents are appropriately controlled and publicly available.
A5.02 The Scheme Owner shall have publicly available procedures for the process under which each standard is developed, approved and revised.	No comments received.	N/A	The Scheme Owner shall have publicly available procedures for the process under which each standard is developed, approved and revised.

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>A5.03 The Scheme Owner shall ensure participation of technical experts and encourages balanced participation by stakeholders in the standard development, revision and approval process.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall ensure participation of technical experts and encourages balanced participation by stakeholders in the standard development, revision and approval process.</p>
<p>A5.04 The Scheme Owner shall ensure that the standard, during its development or for major revisions, a. has been subject to public stakeholder consultation and b. due consideration has been given to comments received from stakeholders during the consultation.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall ensure that the standard, during its development or for major revisions, a. has been subject to public stakeholder consultation and b. due consideration has been given to comments received from stakeholders during the consultation.</p>
<p>A5.05 The Scheme Owner allows a period of at least 60 days for the submission of comments on the draft standard during the public consultation phase.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner allows a period of at least 60 days for the submission of comments on the draft standard during the public consultation phase.</p>

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
A5.06 The Scheme Owner reviews standards at least every five years for continued relevance and for effectiveness in meeting their stated objectives and, if necessary, revises them in a timely manner.	<ul style="list-style-type: none"> • Would recommend every 2 years. 	<ul style="list-style-type: none"> • The SSCI may consider including this element for future revisions of the criteria. 	The Scheme Owner reviews standards at least every five years for continued relevance and for effectiveness in meeting their stated objectives and, if necessary, revises them in a timely manner.
A5.07 The Scheme Owner shall prepare sufficient guidance on the standard to support consistent interpretation of its requirements.	No comments received.	N/A	The Scheme Owner shall prepare sufficient guidance on the standard to support consistent interpretation of its requirements.

Chapter B1. Accreditation

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
B1.01 The Scheme Owner shall require that audit firms achieve and maintain accreditation against the current version of ISO/IEC 17021-1 or ISO/IEC 17065 for the scope of the respective standard of the scheme.	<ul style="list-style-type: none"> Recommend allowing “or equivalent standards”. BSCI audits firms to equivalent standards but does not require ISO certification. 	<ul style="list-style-type: none"> ISO Standards are the industry expectations at this time. B1.02 allows a transition period for those schemes that have issues meeting this requirement. 	The Scheme Owner shall require that audit firms achieve and maintain accreditation against the current version of ISO/IEC 17021-1 or ISO/IEC 17065 for the scope of the respective standard of the scheme.
B1.02 In the event that an audit firm is not yet accredited to ISO/IEC 17021 or ISO/IEC 17065, the Scheme Owner may put procedures in place for a clearly defined transition period to allow audit firms to achieve ISO accreditation. If a transition period is granted, it shall not exceed two years.	No comments received.	N/A	In the event that an audit firm is not yet accredited to ISO/IEC 17021 or ISO/IEC 17065, the Scheme Owner may put procedures in place for a clearly defined transition period to allow audit firms to achieve ISO accreditation. If a transition period is granted, it shall not exceed two years.

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
B1.03 The Scheme Owner has a contractual, enforceable arrangement or formal understanding that requires accreditation bodies to be compliant with the requirements of the current version of ISO/IEC 17011.	No comments received.	N/A	The Scheme Owner has a contractual, enforceable arrangement or formal understanding that requires accreditation bodies to be compliant with the requirements of the current version of ISO/IEC 17011.
B1.04 The Scheme Owner specifies the requirements for audit firms that the accreditation body is required to verify.	No comments received.	N/A	The Scheme Owner specifies the requirements for audit firms that the accreditation body is required to verify.
B1.05 The Scheme Owner only works with accreditation bodies that have personnel with the necessary education, training, technical knowledge and experience for performing accreditation functions in social compliance.	No comments received.	N/A	The Scheme Owner only works with accreditation bodies that have personnel with the necessary education, training, technical knowledge and experience for performing accreditation functions in social compliance.

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

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<p>B1.06 The Scheme Owner shall ensure that assessment staff within the accreditation body have knowledge of the standard and its intent, and of the schemes' assurance requirements.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall ensure that assessment staff within the accreditation body have knowledge of the standard and its intent, and of the schemes' assurance requirements.</p>
<p>B1.07 The Scheme Owner ensures that the accreditation process includes an on-site audit of the audit firm.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner ensures that the accreditation process includes an on-site audit of the audit firm.</p>
<p>B1.08 The Scheme Owner shall have an agreement in place with the accreditation body to ensure that, in the event that an audit firm has its accreditation withdrawn or suspended by the accreditation body, the Scheme Owner is informed of this action.</p>	<ul style="list-style-type: none"> Does this include matters related to the Standards/schemes, for example food safety or Enviro standards? For example, when an independent auditor auditor for the same CB under another Scheme? Does this impact the scheme's responsibility? 	<ul style="list-style-type: none"> The criterion is intended to ensure that an information flow is established so that the Scheme Owner is made aware when an audit firm has the accreditation withdrawn or suspended by the accreditation body. 	<p>The Scheme Owner shall have an agreement in place with the accreditation body to ensure that, in the event that an audit firm has its accreditation withdrawn or suspended by the accreditation body, the Scheme Owner is informed of this action.</p>
<p>B1.09 If more than one accreditation body is used, the Scheme Owner shall ensure that the accreditation is implemented in a consistent manner.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>If more than one accreditation body is used, the Scheme Owner shall ensure that the accreditation is implemented in a consistent manner.</p>

Chapter B2. Relationships with Audit Firms

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
B2.01 The Scheme Owner shall ensure that audit firms that are approved to operate their scheme are legal entities.	No comments received.	N/A	The Scheme Owner shall ensure that audit firms that are approved to operate their scheme are legal entities.
B2.02 The Scheme Owner shall ensure that it has contractual and enforceable arrangements with all audit firms that are approved to operate their scheme.	<ul style="list-style-type: none"> In the case of the ASC we fulfil this requirement via the accreditation body, can this requirement be fulfilled with the agreements maintained between accreditation body and CABs? 	<ul style="list-style-type: none"> The Benchmark Leader makes determinations and recommendations based on the evidence provided in the self-assessment and each case depends on the actual evidence submitted. 	The Scheme Owner shall ensure that it has contractual and enforceable arrangements with all audit firms that are approved to operate their scheme.

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>B2.03 The Scheme Owner shall have in place a system to ensure an audit firm notifies them of all executed audit activities under their scheme, as well as any withdrawal or suspension.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall have in place a system to ensure an audit firm notifies them of all executed audit activities under their scheme, as well as any withdrawal or suspension.</p>
<p>B2.04 The Scheme Owner shall ensure that the audit firm operates an effective and fully implemented quality system. The quality system shall be fully documented and used by all relevant audit firm staff.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall ensure that the audit firm operates an effective and fully implemented quality system. The quality system shall be fully documented and used by all relevant audit firm staff.</p>

Chapter B3. Auditor Competence

Overarching Comments for Chapter B3

- In reference to auditor requirements: The auditors that cover sub scope of social issues have already been formed to perform the main primary production scopes. They do not want to become social auditors. If SSCI forces them to become social auditors, they will not only become super auditors (that are not needed) but the auditing process will become extremely expensive and concentrated in very few auditing companies.

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
B3.01 The Scheme Owner shall define the qualifications and competence criteria required of auditors.	No comments received.	N/A	The Scheme Owner shall define the qualifications and competence criteria required of auditors.
B3.02 The lead auditor performing audits for the audit firm shall have the following experience: - a minimum of 1-year experience in social compliance auditing and a minimum of 100 social compliance audit days OR	<ul style="list-style-type: none"> Given that the social compliance on primary production is much newer than processing/manufacturing, SSCI should consider this requirement differently. Can SSCI explain the definition of “social compliance audit”? Are SEDEX 2nd party or even 3rd party and BSCI audits 	We acknowledge the concerns raised around the auditor competence topics within the Primary Production scope. A new addition has been agreed to be added into the criterion to provide an option to focus on the relevant industry experience within the	The lead auditor performing audits for the audit firm shall have the following experience: - a minimum of 1-year experience in social compliance auditing and a minimum of 100 social compliance audit days or

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>- a minimum of 2 years’ experience in any other type of auditing and 150 audit days of which a minimum of 50 are social compliance audit days. Other audit days may include management system, health and safety, labour inspections, investigations, audit components.</p> <p>OR</p> <p>- a detailed combination of minimum relevant experience in social compliance, trainings, and social compliance audit days that are publicly available and consistent with standard industry practices & norms</p>	<p>considered “social compliance audit”? Can SSCI consider another option with auditors with less audit’s days or “social compliance audits” but with higher requirements before conducting those audits? (they would be fully qualified according to the strictest schemes like SA 8000, for example). APSCA is a certification system but is not a competence criterion. We consider that no additional value on quality of the audit is obtained having that qualification.</p> <ul style="list-style-type: none"> • "Reduce requirement of audit days. Take into consideration the experience of the auditor in other sub sectors of primary production. Relates to D3.03 internal auditor needs the same requirements! Review all pathways of experience certification by APSCA. <ul style="list-style-type: none"> ○ A lead auditor performing audits in primary production shall have experience in primary production. See clause 4.8 2 GFSI BENCHMARKING REQUIREMENTS 	<p>context of social compliance and primary production.</p>	<p>- a minimum of 2 years’ experience in any other type of auditing and 150 audit days of which a minimum of 50 are social compliance audit days. Other audit days may include management system, health and safety, labour inspections, investigations, audit components. or</p> <p>- a detailed combination of minimum relevant experience in social compliance, trainings, and social compliance audit days that are publicly available and consistent with standard industry practices & norms</p>

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	<p>VERSION 2020. After that, the experience in the sub-scope must be evaluated See Table 1: GFSI sector and sub-sector scopes for recognition. 2 GFSI BENCHMARKING REQUIREMENTS VERSION 2020. The requirements described in B3.02 are copy of ASPCA organization. An organization that “aims to elevate the role of the social compliance auditor, and develop a workforce of committed, competent, experienced and ethical professionals. Auditors can help their clients make positive change to the lives of workers by identifying and understanding key labor rights issues who performs only social audits, and which main scope is social issues...ASPCA COMPETENCY</p>		

SSCI Primary Production Draft Criteria – Comments Received
 26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	<p>FRAMEWORK, Section 1 SOCIAL COMPLIANCE AUDITING AS PROFESSION, 2020</p> <ul style="list-style-type: none"> ○ Most of primary production auditors are not in the situation described in section 1 of ASPCA framework. They are primary production auditors whose experience have been checked and who want to include the social aspects. Forcing them to have the experience of a career “social auditor” seems unfair. ○ Requirements shall be equal to those set up for other industries as indicated by GFSI. Reduce the number of lead auditing required and focus on the experience of the auditor already checked. ○ This approach has been already included by the ASPCA organization. When it includes 2 other options to check the 		

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	<p>experience of a potential member: See ASPCA COMPETENCY FRAMEWORK , 3. APSCA QUALIFICATION LEVELS, 2020 Pathway 3: 5+ years in the social compliance or subject related industry in various positions, with a minimum of 35 social compliance audit days and additional experience which may include: training, supervisory/managerial, previous parallel experience such as implementing social compliance programmes and/or audit review</p> <ul style="list-style-type: none"> ○ Pathway 4: Minimum 90 days social compliance industry experience and Minimum of 20 social compliance audit days ○ Finally, this clause requirements shall be aligned with those in clause B3.04. These requirements are more practical and efficient 		

SSCI Primary Production Draft Criteria – Comments Received
 26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	<p>into the performance of the auditor. However, they are not part of the initial competence of the auditor."</p> <ul style="list-style-type: none"> • This criterion mirrors the criterion of the Processing/Manufacturing scope, which is inspired from APSCA's qualifications. However, in the context of primary production, there are specific requirements in terms of knowledge and experience required. While some auditors do not meet these requirements, they have already performed specific work in agriculture and aquaculture specifically. <ul style="list-style-type: none"> ○ Stakeholder's comment/question: APSCA has two (2) other considerations of experience that are not established here. One of the considerations is even lower of what some of the elements in CGF Global Food Safety Initiative (GFSI) and the Global Sustainable Seafood Initiative (GSSI) have. 		

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	<ul style="list-style-type: none"> ○ Stakeholder’s comment/question: It is key to ensure that the process is adapted to the reality in the agricultural and aquaculture context/sector. Limiting the possibility for auditors that are experienced in agriculture and aquaculture sectors will have an impact in terms of the costs. There is a need to ensure that we can review some other elements or possibilities or experience that other auditors already have built. 		
<p>B3.03 In the event that an audit firm is not yet meeting the requirements of B3.02, the Scheme Owner may put procedures in place for a clearly defined transition period to allow audit firms to meet these requirements.</p>	<ul style="list-style-type: none"> • ASC would like to ask for reconsideration of B3.02 	<ul style="list-style-type: none"> • An adjustment has been made in the criterion B3.02. 	<p>In the event that an audit firm is not yet meeting the requirements of B3.02, the Scheme Owner may put procedures in place for a clearly defined transition period to allow audit firms to meet these requirements.</p>

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>B3.04 The Scheme Owner shall require audit firms that auditor competence is demonstrated on a recurring basis. The competence assessment of lead auditors and audit team members shall include the following:</p> <ul style="list-style-type: none"> - an assessment of knowledge of local and national labour and human rights issues and legislation; - an assessment of skills in interviewing workers on human and labour rights issues, - an assessment of knowledge of the relevant sector; - an assessment of the personal attributes of the auditor, to ensure they conduct themselves in a professional manner; - a period of supervision (witnessed audits) to cover specific audit techniques and specific category knowledge; - a documented sign off by the audit firm of the satisfactory completion of assessment requirements. 	<ul style="list-style-type: none"> • "Allow to check these requirements with experience in other subsectors of primary production" <ul style="list-style-type: none"> ○ These requirements shall be evaluated with experience and the possibility of industry experience within the context of primary production. It is not possible to have an auditor that just is assessed in the theoretical knowledge. It must be in the application to primary production." 	<ul style="list-style-type: none"> • These are the minimum requirements – a scheme can add practical application experience if desired. We will consider updating this language in a future iteration of the criteria. 	<p>The Scheme Owner shall require audit firms that auditor competence is demonstrated on a recurring basis. The competence assessment of lead auditors and audit team members shall include the following:</p> <ul style="list-style-type: none"> - an assessment of knowledge of local and national labour and human rights issues and legislation; - an assessment of skills in interviewing workers on human and labour rights issues, - an assessment of knowledge of the relevant sector; - an assessment of the personal attributes of the auditor, to ensure they conduct themselves in a professional manner; - a period of supervision (witnessed audits) to cover specific audit techniques and specific category knowledge;

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
			- a documented sign off by the audit firm of the satisfactory completion of assessment requirements.
B3.05 The Scheme Owner shall require audit firms that their auditors have successfully completed approved training in the respective scheme to the satisfaction of the scheme owner. Training shall be repeated regularly and following major revisions of the scheme.	No comments received.	N/A	The Scheme Owner shall require audit firms that their auditors have successfully completed approved training in the respective scheme to the satisfaction of the scheme owner. Training shall be repeated regularly and following major revisions of the scheme.
B3.06 The Scheme Owner shall ensure that audit firms have a structure in place that assures that auditors shall keep up to date with industry best practice.	<ul style="list-style-type: none"> This concept shall prevail. It is not aligned with requirements in clause B3.03. 	<ul style="list-style-type: none"> The criterion B3.03 is focused on the provision of a clearly defined transition period that allows audit firms to meet the requirements of auditors. In connection with B3.06, this transition period should also include the plan to ensure a structure to be in place assuring that auditors are kept up to date with industry best practice. 	The Scheme Owner shall ensure that audit firms have a structure in place that assures that auditors shall keep up to date with industry best practice.

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>B3.07 The Scheme Owner shall require audit firms to provide specific training to auditors on a regular basis, based on the most pertinent social compliance risks in the regions they operate in and individual performance reviews. Scheme owners shall require audit firms to document training attendance.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall require audit firms to provide specific training to auditors on a regular basis, based on the most pertinent social compliance risks in the regions they operate in and individual performance reviews. Scheme owners shall require audit firms to document training attendance</p>
<p>B3.08 The Scheme Owner shall require that if an audit firm sub-contracts any work to another party, a legally enforceable agreement between the audit firm and the sub-contracted party is in place to ensure the sub-contracted party adheres to the same policies, procedures and competence requirements when auditing against the scheme.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall require that if an audit firm sub-contracts any work to another party, a legally enforceable agreement between the audit firm and the sub-contracted party is in place to ensure the sub-contracted party adheres to the same policies, procedures and competence requirements when auditing against the scheme.</p>
<p>B3.09 The Scheme Owner shall require all approved audit firms to implement an ongoing programme for auditor calibration.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall require all approved audit firms to implement an ongoing programme for auditor calibration.</p>

Chapter B4. Audit Protocol

Overarching Comments for Chapter B4

- Is there anything related to the audit approach under management system? It has been demonstrated that announced audits are less likely to detect real problems while non-announced audits may have a better opportunity to detect issues related to forced/child labour

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
B4.01 The Scheme Owner shall define the methodology to assess compliance with the standard and require audit firms to apply this methodology consistently.	No comments received.	N/A	The Scheme Owner shall define the methodology to assess compliance with the standard and require audit firms to apply this methodology consistently.
B4.02 The Scheme Owner shall require that the scope of the audit includes an on-site assessment of the main site and all other pertinent off-site locations, including accommodation facilities, where provided or mandated.	<ul style="list-style-type: none"> How does SSCI consider remote auditing, given COVID reality? What is SSCI position on this for a longer term? What is the approach of SSCI with regard to remote auditing? Are Scheme Owner who enable remote audits failing to meet this criterion? will exceptions be 	<ul style="list-style-type: none"> We are looking into the topic to ensure that the SSCI criteria also take into account the current reality of Covid-19. An on-site assessment must be a part of the scope of the audit but not the only scope of the audit. 	The Scheme Owner shall require that the scope of the audit includes an on-site assessment of the main site and all other pertinent off-site locations, including accommodation facilities, where provided or mandated.

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	allowed for circumstances as at present?		
<p>B4.03 The Scheme Owner shall define a procedure for audit firms to determine the number and selection of pertinent locations.</p>	No comments received.	N/A	The Scheme Owner shall define a procedure for audit firms to determine the number and selection of pertinent locations.
<p>B4.04 The Scheme Owner shall have a clearly defined and documented audit frequency programme. The maximum validity of an audit or certificate shall not exceed 3 years.</p> <p>The Scheme Owner shall require audit firms to carry out periodic surveillance audits at sufficiently close intervals to verify compliance with the standards' requirements. The rationale behind these intervals shall be clearly defined and transparent.</p>	No comments received.	N/A	<p>The Scheme Owner shall have a clearly defined and documented audit frequency programme. The maximum validity of an audit or certificate shall not exceed 3 years.</p> <p>The Scheme Owner shall require audit firms to carry out periodic surveillance audits at sufficiently close intervals to verify compliance with the standards' requirements. The rationale behind these intervals shall be clearly defined and transparent.</p>

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>B4.05 The Scheme Owner shall ensure that, irrespective of the defined minimum audit frequency, the audit firm shall undertake additional surveillance audits in the event that there is evidence or suspicion of non-conformity within an organisation.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall ensure that, irrespective of the defined minimum audit frequency, the audit firm shall undertake additional surveillance audits in the event that there is evidence or suspicion of non-conformity within an organisation.</p>
<p>B4.06 The audit shall take place during a period when the employment site is in normal operation. Resulting variations to audit frequency shall be clearly defined and documented.</p>	<ul style="list-style-type: none"> Normal operation should be defined carefully. E.g. fallowing period is part of a normal operation in aquaculture, however there is less aspects to be audited than during non-fallowing periods. 	<ul style="list-style-type: none"> The SSCI Benchmark Leader will be informed and trained to carry out the benchmark for applicant schemes. They will evaluate the requirement including the guidance to define what a normal operation should be. 	<p>The audit shall take place during a period when the employment site is in normal operation. Resulting variations to audit frequency shall be clearly defined and documented.</p>
<p>B4.07 The Scheme Owner shall clearly define the expected duration of audits and the rationale for the determination of the duration of the audit that audit firms are required to follow during the audit. The rationale shall at a minimum include the size of the workforce and should include additional criteria that will ensure the effectiveness of the audit such as the physical size of the location to audit, number of locations, nationalities of the workforce, product lines and product categories, etc.</p>	<ul style="list-style-type: none"> There are different ways to specify “audit duration”, depending on the ultimate goal of this requirement of SSCI. Number of sites to be visited, number of workers to be interviewed, duration of the interviews, would be elements that would define the audit duration indirectly. We suggest SSCI to consider those elements as a way to indicate audit duration as well. 	<ul style="list-style-type: none"> The intent of the criterion is to ensure that the Scheme Owner determines a clearly defined clause on their audit duration and the rationale of such determination. The SSCI Benchmark Leader will be responsible to evaluate against the SSCI criteria. 	<p>The Scheme Owner shall clearly define the expected duration of audits and the rationale for the determination of the duration of the audit that audit firms are required to follow during the audit. The rationale shall at a minimum include the size of the workforce and should include additional criteria that will ensure the effectiveness of the audit such as the physical size of the location to audit, number of locations, nationalities of the workforce, product lines and product categories, etc.</p>

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
B4.08 The Scheme Owner shall have in place auditing procedures and guidance for group/multi-site auditing and requires audit firms to apply the methodology consistently, if allowed under the scheme.	No comments received.	N/A	The Scheme Owner shall have in place auditing procedures and guidance for group/multi-site auditing and requires audit firms to apply the methodology consistently, if allowed under the scheme.
B4.09 The Scheme Owner shall require that audits include worker and management interviews, the observation of processes and activities and the review of relevant documentation and records.	No comments received.	N/A	The Scheme Owner shall require that audits include worker and management interviews, the observation of processes and activities and the review of relevant documentation and records.
B4.10 The Scheme Owner shall require that translators are not used to support interviews with language groups which make up to 50% or more of the workforce. In the case of the participation of translators, the independence and confidentiality of translators shall be guaranteed.	<ul style="list-style-type: none"> Recommend clarifying that professional translators are required if the auditor does not speak the language. Clarify when video/phone translators are acceptable versus in-person translator (minimum threshold?) This would limit the development of the program in countries with not enough social auditors, or with limited language speakers. This can in practice provoke that some countries would be banned from joining the programme. If 	<p>We acknowledge the comments received for this criterion. We decided to reword the criterion by taking out the reference to “...support interviews with language groups which make up to 50%...” and keep the focus of the criterion on guaranteeing the independence and confidentiality of the translators.</p> <p>The suggestion is to reformulate the criterion to the following, which could also help to respond to the comment received for criterion B4.12:</p>	<p>The Scheme Owner shall define requirements for the appointment of translators that audit firms are required to implement and make available.</p> <p>In all cases where translators are used, the Scheme Owner shall guarantee their independence and confidentiality.</p>

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	<p>an interpreter is effective for a 49% of the workforce, why it is not effective for the 51%? This would have a huge impact on small countries that have a lack of qualified social auditors. E.g. to find a social auditor that is fluent in Estonian, Albanian or Swahili can mean that those applicants won't be able to join the programme. In addition, in some countries the main language of the workforce is not the local language. That would mean a foreign social auditor would be needed, who not necessarily is familiar with the local legislation of the country of the operation. In those cases, language knowledge does not mean better social audits. We kindly ask to reconsider this requirement.</p> <ul style="list-style-type: none"> • "ELIMINATE LIMITATION TO HAVE INTERPRETERS OR TRANSLATORS". Most general composition of labour in primary production includes several nationalities. It is general than more than 50% of the workforce of a producer is compose of many different 	<p>B4.10 The Scheme Owner shall define requirements for the appointment of translators that audit firms are required to implement and make available.</p> <p>In all cases where translators are used, the Scheme Owner shall guarantee their independence and confidentiality.</p>	

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	<p>language groups. Limiting the use of translators or interpreters, would make impossible to proceed with the auditing process. Or it will turn each audit in a very difficult process for the producer.</p> <ul style="list-style-type: none"> ○ In the original GSCP criteria there was a note that is missing and put in a context why this must be eliminated see GSCP Audit Process and Methodology tool. 4.2. Interviews, 4.2.3. (NB - In cases where there is a multi-lingual workforce, worker interviewers work through a translator to access the views of workers from minority groups.)" ● It is not understood why this criterion is integrated specifically for primary production and not for manufacturing. What is the rationale of adding this criterion specifically for primary production? In primary 		

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	<p>production activities, seasonal workers do make up 50%+ of the workforce, they might speak several different native languages in the same production site and the workforce turnover can be extremely high (especially when contacted through agencies). How feasible is it that the auditor team can cover this plurality of languages, while also being fluent in the language of the main auditee and having the required sector competences.</p> <ul style="list-style-type: none"> • The structure of B4.10 seems awkward. For clarity, could it be reworded to something like: <ul style="list-style-type: none"> ○ <i>The scheme owner shall require that native language speakers conduct worker interviews if the language group represents 50% or more of the workforce. In the case of the participation of translators, the independence and confidentiality of</i> 		

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	<p style="text-align: center;"><i>translators shall be guaranteed.</i></p> <ul style="list-style-type: none"> • Understandable - any exclusions in terms of practicality and availability? There are limited number of qualified auditors in South Africa for example, with a very large demand for auditing. South Africa also has 11 official languages. When will the best interest of the process be at play and how can this be managed? • Why does this come in the primary production whereas this is also relevant for the processing/manufacturing? How feasible is it to ensure the availability of interviewers that are native speakers? It feels as a very ambitious criteria, rather than requiring auditors or audit teams to be able to communicate on this? • This is very challenging. Right now, we have some certificates in countries where there are not any social auditors that speak in native language (e.g. Tanzania, Croatian, Albania). This will be a challenge if you put this for the scheme. We will 		

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	<p>have a certification for schemes where social auditing is not a practice yet and thus having a qualified native-level social auditor is not easy.</p>		
<p>B4.11 The Scheme Owner shall define the methodology for defining the number of workers to be interviewed. Interviewed workers shall reflect a wide range of workers and include potentially vulnerable workers and those in less skilled positions.</p>	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall define the methodology for defining the number of workers to be interviewed. Interviewed workers shall reflect a wide range of workers and include potentially vulnerable workers and those in less skilled positions.</p>
<p>B4.12 The Scheme Owner shall define requirements for the execution of worker interviews that audit firms are required to implement. The requirements include at a minimum that:</p> <ul style="list-style-type: none"> - Workers shall be interviewed both individually and in groups - Workers shall be interviewed in a confidential setting without any supervision or management personnel present - Information provided by workers shall be processed in a non-attributable manner 	<ul style="list-style-type: none"> • Recommend clarifying that professional translators are required if the auditor does not speak the language. Clarify when video/phone translators are acceptable versus in-person translator (minimum threshold?) • "Clarify: worker must be interviewed in the language in which they receive working instructions. Otherwise multilingual labour force will be impossible to interview. The selection shall be 	<ul style="list-style-type: none"> • The SSCI Benchmark Criteria serve as a benchmark and not a standard. The intent of the criterion is to ensure that the execution of worker interviews are implemented by audit firms in a manner that is accessible to workers in terms of language, confidentiality, and also the composition of the workers as outlined in the criterion. The criterion B4.10 has been adapted to ensure that the Scheme Owner defines requirements for the appointment of translators that 	<p>The Scheme Owner shall define requirements for the execution of worker interviews that audit firms are required to implement. The requirements include at a minimum that:</p> <ul style="list-style-type: none"> - Workers shall be interviewed both individually and in groups - Workers shall be interviewed in a confidential setting without any supervision or management personnel present - Information provided by workers shall be processed in a non-attributable manner

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<ul style="list-style-type: none"> - Workers shall be interviewed in their own language - The selection of workers shall consider that they are representative of the factory, by characteristics such as gender, age, length of service and origin - In any event, management, supervisors or their representatives shall not act as interpreters. 	<p>representative of the workers present".</p>	<p>audit firms are required to implement and make available for audits. SSCI Benchmark Leaders will be responsible to conduct the benchmark on the scheme requirements against the SSCI criteria, as well as checking relevant documentation for alignment.</p>	<ul style="list-style-type: none"> - Workers shall be interviewed in their own language - The selection of workers shall consider that they are representative of the factory, by characteristics such as gender, age, length of service and origin - In any event, management, supervisors or their representatives shall not act as interpreters

Chapter B5. Audit Reporting

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
B5.01 The Scheme Owner shall require certificates/audit reports to include, at a minimum: <ul style="list-style-type: none"> – the name and address of the Scheme Owner; – the name and address of the audit firm; – the name and address of the audited site; – the effective date of issue of the certificate/audit report; – the substance (scope of audit) of the certificate/audit report; – in case of certification schemes: the term for which the certification is valid; – signature of the issuing officer. 	No comments received.	N/A	The Scheme Owner shall require certificates/audit reports to include, at a minimum: <ul style="list-style-type: none"> – the name and address of the Scheme Owner; – the name and address of the audit firm; – the name and address of the audited site; – the effective date of issue of the certificate/audit report; – the substance (scope of audit) of the certificate/audit report; – in case of certification schemes: the term for which the certification is valid; – signature of the issuing officer.

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>B5.02 Reports and grading systems shall clearly identify whether audits are announced, semi-announced or unannounced.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>Reports and grading systems shall clearly identify whether audits are announced, semi-announced or unannounced.</p>
<p>B5.03 The Scheme Owner shall require that audit reports shall contain evidence that all the relevant criteria have been checked during the audit. In the case where a non-conformity is identified by the auditor, clear and concise details of the non-conformity shall be provided in the audit report.</p>	<ul style="list-style-type: none"> • Can SSCI specify what is "relevant criteria"? Can the scheme owner define what is considered as relevant criteria? 	<ul style="list-style-type: none"> • The SSCI Benchmark Criteria serve as a benchmark not a standard. The intent of the criterion is mainly to ensure that the relevant requirements of the scheme have been checked during the audit. The SSCI Benchmark Leader will be responsible to carry out the benchmark and conduct documentation checks or evidence from the Scheme Owner to ensure alignment. This could include normative documents, the standards, methodologies with audit firms, key checklists of evidence to be checked by audit firms, examples of audit reports among others as appropriate. 	<p>The Scheme Owner shall require that audit reports shall contain evidence that all the relevant criteria have been checked during the audit. In the case where a non-conformity is identified by the auditor, clear and concise details of the non-conformity shall be provided in the audit report.</p>

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>B5.04 The Scheme Owner shall require audit firms to ensure that audit reports of full audits are given a thorough technical review. Surveillance audits shall, at a minimum, be reviewed according to a risk-based approach.</p> <p>For the review process to be effective it shall be ensured that:</p> <ul style="list-style-type: none"> - reviewers are impartial and technically capable of understanding the content of reports; - all applicable requirements of the standard have been fully covered, using any supporting notes made during the assessment by a suitably qualified auditor, - all areas of non-conformity have been identified and supported with clear evidence, - in the case of certification schemes, effective corrective action has been taken to resolve these non-conformities. 	<ul style="list-style-type: none"> • It says, ‘The Scheme Owner shall require audit firms to ensure that audit reports of full audits are given a thorough technical review.’ I just wonder why only for full audits and not every audit regardless it is a full audit or not. (versus a re-audit or spot check) • ASC considers that surveillance audits have the same relevance as initial audits for technical reviews, and the requirement should not be different. <ul style="list-style-type: none"> ○ Can SSCI clarify if only the last bullet point applies to certification schemes, or the previous ones are for both certification and non-certification schemes? 	<ul style="list-style-type: none"> • We acknowledge the relevance of the comments raised and would include them in a list of consideration points for the next iteration of the criteria revision. 	<p>The Scheme Owner shall require audit firms to ensure that audit reports of full audits are given a thorough technical review. Surveillance audits shall, at a minimum, be reviewed according to a risk-based approach.</p> <p>For the review process to be effective it shall be ensured that:</p> <ul style="list-style-type: none"> - reviewers are impartial and technically capable of understanding the content of reports; - all applicable requirements of the standard have been fully covered, using any supporting notes made during the assessment by a suitably qualified auditor, - all areas of non-conformity have been identified and supported with clear evidence, - in the case of certification schemes, effective corrective action has been taken to resolve these non-conformities.

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>B5.05 The Scheme Owner shall define clear procedures in case non-compliances are found that pose an imminent danger to workers.</p>	<ul style="list-style-type: none"> • Recommend expanding this to include clear procedures in case of zero tolerance issues? “Imminent danger” to me means egregious health and safety violations. But it also seems necessary to have procedures in place for egregious human rights/environmental violations beyond imminent danger (underage labor, forced labor, etc.) <ul style="list-style-type: none"> ○ Also, it provides no guidance on what those procedures should be. Allows the scheme to decide completely. Recommend providing more specifics on the procedures expected. ○ Suggest defining clearly what imminent danger is referring to like threaten to members’ health and safety. Suggest adding the 24 	<ul style="list-style-type: none"> • The SSCI Benchmark Criteria serve as a benchmark and not intended to be a standard. The criterion intends to ensure that there are clear procedures in place for non-compliance cases that pose an imminent danger to workers. It is the responsibility of the Scheme Owner to define these procedures including cases, and key elements considered as dangerous. Dangers may vary across different elements of the primary production process and we aim not to exclude any possibilities. • The SSCI Benchmark Leader will be responsible to evaluate the requirement against the SSCI criterion by checking relevant documentation from the Scheme Owner. 	<p>The Scheme Owner shall define clear procedures in case non-compliances are found that pose an imminent danger to workers.</p>

SSCI Primary Production Draft Criteria – Comments Received
 26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	<p>hours alert procedure to inform audit requestor and brands.</p>		

Chapter B6. Follow-up Action

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
B6.01 The Scheme Owner shall have a system for the classification of non-conformities that clearly specifies the definition of the different types of non-conformities.	No comments received.	N/A	The Scheme Owner shall have a system for the classification of non-conformities that clearly specifies the definition of the different types of non-conformities.
B6.02 The Scheme Owner shall require the auditee to perform a root cause analysis of the non-conformities found.	No comments received.	N/A	The Scheme Owner shall require the auditee to perform a root cause analysis of the non-conformities found.

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>B6.03 If one or more non-conformities are found, the Scheme Owner shall require the auditee to prepare a corrective action plan, including details on the corrective actions and the time frame in which corrective actions shall be undertaken.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>If one or more non-conformities are found, the Scheme Owner shall require the auditee to prepare a corrective action plan, including details on the corrective actions and the time frame in which corrective actions shall be undertaken.</p>
<p>B6.04 Verification of the implementation of the corrective action plan by an audit firm shall take the form of further on-site assessment OR the review of submitted documentation assessed by a technically competent member or group within the audit firm. Follow-up audits shall be performed for critical or major non-compliances or when corrective actions can be evaluated only through an on-site visit.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>Verification of the implementation of the corrective action plan by an audit firm shall take the form of further on-site assessment OR the review of submitted documentation assessed by a technically competent member or group within the audit firm.</p> <p>Follow-up audits shall be performed for critical or major non-compliances or when corrective actions can be evaluated only through an on-site visit.</p>
<p>B6.05 The Scheme Owner shall define clear procedures regarding the follow-up action when non-conformities are found. In the case of certification schemes, all evidence of corrective action shall be submitted, completed and verified by the audit firm, within a timescale defined by the Scheme Owner.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall define clear procedures regarding the follow-up action when non-conformities are found. In the case of certification schemes, all evidence of corrective action shall be submitted, completed and verified by the audit firm, within a timescale defined by the Scheme Owner.</p>

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>B6.06 In case of certification schemes, the Scheme Owner shall provide audit firms with consistent documented procedure(s) that specify the conditions under which certification may be suspended or withdrawn, partially or in total, for all or part of the scope of certification.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>In case of certification schemes, the Scheme Owner shall provide audit firms with consistent documented procedure(s) that specify the conditions under which certification may be suspended or withdrawn, partially or in total, for all or part of the scope of certification.</p>
<p>B6.07 The Scheme Owner shall require that the audit firm has in place a clearly defined and publicly available appeals procedure.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall require that the audit firm has in place a clearly defined and publicly available appeals procedure.</p>

Chapter B7. Data Management

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Resposnes	Final Criteria
B7.01 The Scheme Owner shall have in place a clearly defined data management system, which will hold and maintain data for the effective management and operation of the scheme.	No comments received.	N/A	The Scheme Owner shall have in place a clearly defined data management system, which will hold and maintain data for the effective management and operation of the scheme.
B7.02 The Scheme Owner shall ensure that the data management system incorporates as a minimum: <ul style="list-style-type: none"> - Number of approved audit firms, - Number of audit reports/certificates issued - In case of certification schemes: number of delisted sites. 	No comments received.	N/A	The Scheme Owner shall ensure that the data management system incorporates as a minimum: <ul style="list-style-type: none"> - Number of approved audit firms, - Number of audit reports/certificates issued - In case of certification schemes: number of delisted sites

Chapter C1. Smallholders (Overview)

Overarching Comments for Chapter C1

Exception for Smallholders

- What would happen if a scheme does not make an exception between smallholders, group certifications or multi-site certifications?
- If a child is working in a family labour setting and has his/her passport retained by his/her father, the requirement on passport retention may not be applicable.

Beware of the exceptions given to smallholders

- On the emphasis made on documentation exemption, my concern is that by introducing the exemption, we are forcing the schemes to expand the definition of smallholders. If you want a softer element on scheme management, there is a risk on the heavy requirement on the exemption that will lead schemes to rule by exemptions rather than by SSCI documentations. This stimulates – whether it is possible to reduce the formal written documentation that it is not only smallholders that may not manage documentations but maybe other procedures are more relevant instead of allowing a loophole of exemptions in here.

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
C1.01 The Scheme Owner shall indicate whether or not it provides any specific requirements, exemptions, rules and definitions for smallholders in its assessment process.	<ul style="list-style-type: none"> The definition of smallholders and or family farms is very different from country to country. Is it fine if the definition is subjective to South African interpretation? Will it be fine to define Scheme's own groupings and levels? In SIZA's case, no differences exist in audit scope or requirements. Will the requirement be that the definition should be included in the Standard itself, or would something like a capacity building programme be adequate? 	<ul style="list-style-type: none"> Given the diversity of jurisdictions, commodities, and approaches, the SSCI has not yet proscribed a set method for defining a smallholder. Each scheme can provide a definition, or not, and we will evaluate if any criteria are needed in the future on this topic. 	The Scheme Owner shall indicate whether or not it provides any specific requirements, exemptions, rules and definitions for smallholders in its assessment process
C1.02 The Scheme Owner shall indicate in the audit or assessment report whether smallholders were covered during any particular assessment or certification process.	<ul style="list-style-type: none"> Clarify: only when there is different treatment to smallholder in the standard Clarify: are we referring to the audit of the scheme or to an auditee conducted on a producer? If the latter, does it mean that the label 	<ul style="list-style-type: none"> If the scheme chooses to assess a producer site under its smallholder definition, it should indicate this on the report. A scheme, as always, can choose not to make such a distinction. 	The Scheme Owner shall indicate in the audit or assessment report whether smallholders were covered during any particular assessments or certification process

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	<p>"smallholder" needs to be present OR that the audit contains information sufficient to identify an auditee as meeting the small-holder criteria?</p>		
<p>C1.03 The Scheme Owner shall disclose their complete list of exemptions for smallholders.</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall disclose their complete list of exemptions for smallholders</p>
<p>C1.04 The Scheme Owner shall not allow performance exemptions for: - Child labour - Forced labour - Minimum wage for hired workers / contracted workers - Fair treatment of workers - Operational health and safety</p> <p>Documentation exemptions may be permitted for the above topics.</p>	<ul style="list-style-type: none"> • It seems it is too board to “fair treatment” of workers, and it is not covering some other ZT issues like bribery. • Can SSCI clarify: What is the definition of smallholder? What documentation exemptions means? 	<p>Fair treatment of workers covers those topics included, but not limited to those in the SSCI Social Criteria for Primary Production. Upon review, we have added Business Ethics to the criterion.</p> <p>Documentation exemptions allow schemes to verify these topics on the smallholder level without requiring extensive documentation of the producer’s performance.</p>	<p>The Scheme Owner shall not allow performance exemptions for:</p> <ul style="list-style-type: none"> - Child labour - Forced labour - Minimum wage for hired workers / contracted workers - Fair treatment of workers - Operational health and safety -Business Ethics <p>Documentation exemptions may be permitted for the above topics.</p>

Chapter D1. Group Certification (Overview)

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Note: IMS is an Internal Management System.

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
D1.01 The Scheme Owner shall indicate whether or not it provides any specific requirements, exemptions, rules and definitions for group or multi-site certifications/auditing.	Applicable to schemes with or without IMS	No comments received.	N/A	The Scheme Owner shall indicate whether or not it provides any specific requirements, exemptions, rules and definitions for group or multi-site certifications/auditing
D1.02 The Scheme Owner shall indicate in the audit or assessment report whether multiple producers or sites were covered during any particular assessment or certification process.	Applicable to schemes with or without IMS	No comments received.	N/A	The Scheme Owner shall indicate in the audit or assessment report whether multiple producers or sites were covered during any particular assessment or certification process

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
D1.03 If group or multi-site certification is allowed, the standard shall disclose its sampling methodology.	Applicable to schemes with or without IMS	No comments received.	N/A	If group or multi-site certification is allowed, the standard shall disclose its sampling methodology
D1.04 The Scheme Owner shall indicate whether internal management systems are reviewed during the group or multi-site certification process. In the absence of an IMS, the standard shall disclose its assessment methodology.	Applicable to schemes with or without IMS	No comments received.	N/A	The Scheme Owner shall indicate whether internal management systems are reviewed during the group or multi-site certification process. In the absence of an IMS, the standard shall disclose its assessment methodology.
D1.05 The Scheme Owner shall define clear rules for the creation of producer groups.	Applicable to schemes with or without IMS	<ul style="list-style-type: none"> "Clarify: scheme owner never creates producer groups. It should be that clear sampling rules shall exist for producer groups. Check origin of criteria: GFSI MSS 1.2. The Certification Program Owner shall clearly specify the conditions for a multi-site sampling. <ul style="list-style-type: none"> ○ Already covered in D1.03 of this 	<ul style="list-style-type: none"> The criterion has been reviewed and updated. 	The Scheme Owner shall define clear rules for the operation of producer groups.

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
		<p>document ""If group or multi-site certification is allowed, the standard shall disclose its sampling methodology""</p> <ul style="list-style-type: none"> The way the criterion is worded, it looks like a scheme has to tell the producer on how to organise about how legally compose the creation of producer groups – whereas the source from the GFSI criterion is focused on sampling. 		
<p>D1.06 The Scheme Owner shall establish a risk-based approach to determine the eligibility of commodities for the group or multi-site certification/auditing. Certain crops or activities deemed "high-risk" shall not be eligible for group or multi-site certification/auditing.</p>	<p>Applicable to schemes with or without IMS</p>	<ul style="list-style-type: none"> ASC considers that this would be against the intent of the certification programmes, that is to recognise and differentiate producers that control their impacts. Without risks what would be the sense of having certification. Can SSCI clarify what is rationale for this requirement? What could be examples for this? "Eliminate this requirement. Criteria origin is from food safety risk. It is not suitable for social 	<ul style="list-style-type: none"> Having a risk based approach makes sense if coupled with what you will do afterwards while in the social aspect, as we plan towards cross-commodity and that social risks may include diverse topics, it may be better to remove the criteria and keep it 	<p>Criterion deleted.</p>

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
		<p>risk. The food safety risk of a commodity cannot be applied to social context or issues in primary production. This risk concept refers to food safety risk and it is not applicable to sampling for social compliance. Missing social risk concept with science food safety risk, can limit auditing processes due to the produce category and not the real social situation of the group.</p> <ul style="list-style-type: none"> ○ To proof incompatibility check risk clause origin to the following: 2 Benchmarking Requirements V2020.1 Part 2 ○ In addition, Certification Programs recognised against those scopes: ○ AI FARMING OF ANIMALS FOR MEAT/ MILK/ EGGS / HONEY, • All FARMING OF FISH AND SEAFOOD, • BI FARMING OF 	<p>for the next iteration of the criteria.</p> <p>After reviewing the feedback, we have removed this criterion at this time.</p>	

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
		<p>PLANTS (OTHER THAN GRAINS AND PULSES), • BII FARMING OF GRAINS AND PULSES, • BIII PRE-PROCESS HANDLING OF PLANT PRODUCTS, NUTS AND GRAINS shall satisfy the below criteria</p> <ul style="list-style-type: none"> ○ Clause 6.28 Site Audit Sampling A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed “high-risk” shall not be eligible for multi-site or group certification. ○ That risk is not a social or labour risk. It is a commodity risk due to physical contamination risk." <ul style="list-style-type: none"> • This clause is taken from GFSI, which has a food safety risk 		

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
		<p>focus. Is it appropriate here? What do you have in mind? Please give examples of crops or activities deemed “high social risk” sufficient to block multi-site certification.</p> <ul style="list-style-type: none"> • In the source from GFSI, they touch upon high risks to crops without necessarily referring to the food safety compliance. The implication of this criterion is the need to define what high risks mean in the context of social compliance. In this context, it may seem that schemes need to look for hotspots of risks (e.g. child/forced labour issues), yet the rule of sampling as mentioned in the GFSI source, is not necessarily relevant. <ul style="list-style-type: none"> ○ Stakeholder’s comment/question: In the food safety point of view, there are some areas where food sampling can be conducted on the risks of crops (e.g. not peeled), and there is a whole definition of risks. 		

Chapter D2. Group Certification (Central Function)

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Note: IMS is an Internal Management System.

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
D2.01 The Scheme Owner shall require that producer groups and multi-site organisations have a clearly defined central function who acts on behalf of the group members or sites and it is responsible to ensure management commitment and compliance to the scheme requirements.	Applicable to schemes with or without IMS	<ul style="list-style-type: none"> "Eliminate this criterion is in d2.05. Original is GFSI MSS 2.1. There shall be a clearly defined central function to ensure management commitment to the system / integrity and clearly describe the roles and responsibilities of management, internal auditors and other members of the organisation. The central management function shall be separate and independent from the sub-sites." 	<p>D2.05 The Scheme Owner shall indicate whether a central function is responsible for implementing an Internal Management System (IMS) describing the roles and responsibilities of management, internal auditors and other members of the organisation related to scheme compliance.</p> <p>In the absence of an IMS, the Scheme Owner shall establish the rules for certification/audit ensuring that the audit firm conducts annual audits on:</p> <ul style="list-style-type: none"> All accepted products and production processes 	The Scheme Owner shall require that producer groups and multi-site organisations have a clearly defined central function who acts on behalf of the group members or sites and it is responsible to ensure management commitment and compliance to the scheme requirements.

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
			<ul style="list-style-type: none"> • All registered group members or sites • The administrative sites, where relevant <p>As we do not define smallholders, we need both criteria (D2.01 and D2.05).</p>	
<p>D2.02 The Scheme Owner shall require that there is an established, legal or contractual link between the group members or sites and the central function.</p>	<p>Applicable to schemes with or without IMS</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall require that there is an established, legal or contractual link between the group members or sites and the central function.</p>
<p>D2.03 The Scheme Owner shall require that the central function maintains an up-to-date list of group members and sites and has a procedure in place to inform any new group member applicants or new sites about the requirements of the scheme.</p>	<p>Applicable to schemes with or without IMS</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall require that the central function maintains an up-to-date list of group members and sites, and has a procedure in place to inform any new group member applicants or new sites about the requirements of the scheme.</p>

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>D2.04 The Scheme Owner shall require that the central function ensures that acceptance of new group members or sites happens only after an internal inspection has been performed and an improvement plan to ensure compliance has been agreed, if necessary.</p>	<p>Applicable to schemes with or without IMS</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall require that the central function ensures that acceptance of new group members or sites happens only after an internal inspection has been performed and an improvement plan to ensure compliance has been agreed, if necessary.</p>
<p>D2.05 The Scheme Owner shall indicate whether a central function is responsible for implementing an Internal Management System (IMS) describing the roles and responsibilities of management, internal auditors and other members of the organisation related to scheme compliance.</p> <p>In the absence of an IMS, the Scheme Owner shall establish the rules for certification/audit ensuring that the audit firm conducts annual audits on:</p> <ul style="list-style-type: none"> • All accepted products and production processes • All registered group members or sites • The administrative sites, where relevant 	<p>Applicable to schemes with IMS</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall indicate whether a central function is responsible for implementing an Internal Management System (IMS) describing the roles and responsibilities of management, internal auditors and other members of the organisation related to scheme compliance.</p> <p>In the absence of an IMS, the Scheme Owner shall establish the rules for certification/audit ensuring that the audit firm conducts annual audits on:</p> <ul style="list-style-type: none"> • All accepted products and production processes

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
				<ul style="list-style-type: none"> • All registered group members or sites • The administrative sites, where relevant
<p>D2.06 The Scheme Owner shall require that the central function has in place sufficient management and technical capacity to implement and maintain an internal audit programme.</p>	<p>Applicable to schemes with IMS</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall require that the central function has in place sufficient management and technical capacity to implement and maintain an internal audit programme.</p>
<p>D2.07 The Scheme Owner shall require that the central function maintains and retains a copy of all relevant IMS documents related to the group members or sites under the scheme.</p>	<p>Applicable to schemes with IMS</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall require that the central function maintains and retains a copy of all relevant IMS documents related to the group members or sites under the scheme.</p>

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
D2.08 The Scheme Owner shall require that the central function performs a yearly management review of the IMS to ensure its effectiveness	Applicable to schemes with IMS	No comments received.	N/A	The Scheme Owner shall require that the central function performs a yearly management review of the IMS to ensure its effectiveness
D2.09 The Scheme Owner shall require that the central function has an effective grievance mechanism. The mechanism can be used by all internal and external stakeholders.	Applicable to schemes with or without IMS	No comments received.	N/A	The Scheme Owner shall require that the central function has an effective grievance mechanism. The mechanism can be used by all internal and external stakeholders

Chapter D3. Group Certification (Internal Audit Programme)

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Note: IMS is an Internal Management System.

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>D3.01 The Scheme Owner shall require that an internal audit programme be in place and undertaken by the central function. This programme shall ensure an annual audit of all group members or sites, the central function and the internal management system.</p>	<p>Applicable to schemes with IMS</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall require that an internal audit programme be in place and undertaken by the central function. This programme shall ensure an annual audit of all group members or sites, the central function and the internal management system.</p>
<p>D3.02 The Scheme Owner shall require that the internal audit programme of the central function be described in documented procedures and be both practical and feasible in operative terms.</p>	<p>Applicable to schemes with IMS</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall require that the internal audit programme of the central function be described in documented procedures and be both practical and feasible in operative terms.</p>
<p>D3.03 The Scheme Owner shall require that clear requirements for internal auditors and technical reviewers be defined and documented by the central function and reviewed by the audit firm. Internal auditors must meet similar or comparable requirements to those for external auditors, as set out within each scheme owner's rules. This shall include, at a minimum, requirements related to internal auditor education, training, work experience or other qualifications.</p>	<p>Applicable to schemes with IMS</p>	<ul style="list-style-type: none"> • ASC does not agree to require technical review and comparable requirements for internal auditors with external ones. This would create a big barrier for making certification schemes more accessible for small producers. • Evaluate to change depending on requirements of b3.03 	<p>For this criterion, the Technical Working Group reviewing the feedback and recommended that the language remain intact. The scheme owner shall define the training expectations of internal auditors in line with those of external auditors.</p>	<p>The Scheme Owner shall require that clear requirements for internal auditors and technical reviewers be defined and documented by the central function and reviewed by the audit firm.</p> <p>Internal auditors must meet similar or comparable requirements to those for external auditors, as set out within each scheme owner's</p>

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
		<p>auditor competence. If b3.03 requirements of experience stay, then it will be difficult to find internal auditors.</p> <ul style="list-style-type: none"> “Internal auditors must meet similar of comparable requirements to those for external auditors” seems to set the bar too high. One cannot expect this from groups/associations of smallholders. 		<p>rules. This shall include, at a minimum, requirements related to internal auditor education, training, work experience or other qualifications.</p>
<p>D3.04 The Scheme Owner shall require that internal auditors be regularly evaluated, calibrated and monitored. Records of the evaluation, calibration and monitoring activities shall be maintained by the central function.</p>	<p>Applicable to schemes with IMS</p>	<ul style="list-style-type: none"> ASC would like to ask SSCI to reconsider this requirement as it would be very difficult for small producers to achieve. 	<ul style="list-style-type: none"> This is essential for multi-site auditing. The internal auditors may not always be the same. The essence of this criterion remains the same. 	<p>The Scheme Owner shall require that internal auditors be regularly evaluated, calibrated and monitored. Records of the evaluation, calibration and monitoring activities shall be maintained by the central function.</p>

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
D3.05 The Scheme Owner shall require that internal audit reports be reviewed by the central function and include corrective measures to address the non-conformances resulting from the internal audit, as well as evidence that non-conformances are closed.	Applicable to schemes with IMS	No comments received.	N/A	The Scheme Owner shall require that internal audit reports be reviewed by the central function and include corrective measures to address the non-conformances resulting from the internal audit, as well as evidence that non-conformances are closed.

D4. Group Certification (Audit Protocol)

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Note: IMS is an Internal Management System.

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
D4.01 The Scheme Owner shall require that the central function requests group or multi-site certification in their application. The central function, not the individual group members or sites, shall be contracted to the audit firm.	Applicable to schemes with or without IMS	No comments received.	N/A	The Scheme Owner shall require that the central function requests group or multi-site certification in their application. The central function, not the individual group members or sites, shall be contracted to the audit firm.
D4.02 The Scheme Owner shall require that the central function be included in the scope of the certification/audit report.	Applicable to schemes with IMS	No comments received.	N/A	The Scheme Owner shall require that the central function be included in the scope of the certification/audit report.

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>D4.03 The Scheme Owner shall require that the central function be audited by the audit firm at least annually and before the audit firm undertakes the auditing of sample group members or sites. If necessary, a small number of the sample group members or sites may be audited prior to the audit to the central function.</p>	<p>Applicable to schemes with IMS</p>	<p>No comments received.</p>	<p>N/A</p>	<p>The Scheme Owner shall require that the central function be audited by the audit firm at least annually and before the audit firm undertakes the auditing of sample group members or sites. If necessary, a small number of the sample group members or sites may be audited prior to the audit to the central function.</p>

D5. Group Certification (Site-audit sampling)

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Note: IMS is an Internal Management System.

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
D5.01 The Scheme Owner shall establish the rules for a risk-based sampling programme including a minimum sample size. The sampling program shall include provisions to increase sample size based on various risk factors (e.g., audit scope, types of activities on-site, findings of the central management system audit, findings at sampled group members or sites, customer requirements, etc.), size of the group or multi-site, and the internal structure.	Applicable to schemes with IMS	No comments received.	N/A	<p>The Scheme Owner shall establish the rules for a risk-based sampling programme including a minimum sample size.</p> <p>The sampling program shall include provisions to increase sample size based on various risk factors (e.g., audit scope, types of activities on-site, findings of the central management system audit, findings at sampled group members or sites, customer requirements, etc.), size of the group or multi-site, and the internal structure.</p>

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
D5.02 The Scheme Owner shall ensure that the audit firm audits a sample of the group members or sites every year.	Applicable to schemes with IMS	No comments received.		The Scheme Owner shall ensure that the audit firm audits a sample of the group members or sites every year.
D5.03 The Scheme Owner shall require that the square root of the total number of registered group members or sites be audited. The sampling plan can be adjusted based on the use of monitoring technologies.	Applicable to schemes with IMS	<ul style="list-style-type: none"> ASC considers that a risk- based approach for sampling is more robust than using a fix number as square root. We would like to ask SSCI to reconsider this requirement and add risk-based approach as an option. 	<ul style="list-style-type: none"> The SSCI Technical Working Group reviewed this criterion and recommended that the language remain the same. A risk-based approach can form a part of the monitoring technologies by a square root is the industry expectation. 	<p>The Scheme Owner shall require that the square root of the total number of registered group members or sites be audited.</p> <p>The sampling plan can be adjusted based on the use of monitoring technologies.</p>
D5.04 The Scheme Owner shall require that the sampling programme be partly selective and partly non-selective, but at least 25% of the sample shall be randomly selected from the total number of group members or sites. In relation to the selected sites, these shall be identified based on the	Applicable to schemes with IMS	<ul style="list-style-type: none"> ASC considers that risk- based approach for sampling is more robust than using a fix number. We would like to ask SSCI to reconsider this requirement and add risk-based approach as an option instead of only a fix percentage. 	<ul style="list-style-type: none"> The SSCI Technical Working Group reviewed this criterion and recommended that the language remain the same. A risk-based approach can form a part of the monitoring technologies by a square root is the industry expectation. 	The Scheme Owner shall require that the sampling programme be partly selective and partly non-selective, but at least 25% of the sample shall be randomly selected from the total number of group members or sites. In relation to the selected sites, these shall be identified based on the organisation’s internal audit program findings and the individual group member or site risk profiles.

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>organisation’s internal audit program findings and the individual group member or site risk profiles.</p>				
<p>D5.05 The Scheme Owner shall require that a proportion of the audits be unannounced. The unannounced audit sample size shall be determined by the social compliance risk but be at a minimum of 20% of the sample size.</p>	<p>Applicable to schemes with or without IMS</p>	<ul style="list-style-type: none"> • Putting a minimum in the sample size of an unannounced auditing will defeat the purpose of the auditing. There are crops with very short labor window activities. (e.g. strawberries 3 to 4 weeks). If produce handling operations are not included, very likely labor will not be present. This requirement make sense when auditor evaluate activities rather than people conditions. • It would be better to consider how non-announced audits can be done as in the context of agricultural activities as there are elements on seasonality involved (where workers may work only for 3 weeks during a specific season and do not work for the rest of the year) <ul style="list-style-type: none"> ○ Stakeholder’s comment/question: 	<p>The SSCI Technical Working Group reviewed this criterion and recommended that the language remain the same.</p>	<p>The Scheme Owner shall require that a proportion of the audits be unannounced. The unannounced audit sample size shall be determined by the social compliance risk, but be at a minimum of 20% of the sample size.</p>

SSCI Primary Production Draft Criteria – Comments Received
26th of May 2021

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
		<p>In the food safety world, it is different as you can conduct assessments/audits any time. In the social compliance, as the checks on workers are involved, it can be different.</p> <ul style="list-style-type: none"> ○ Suggestion from stakeholder: Having the option on having partial unannounced assessments where you have the possibility to do the other part of the assessments could be good. 		
<p>D5.06 In the case of certification schemes, if non-conformities are found which may not jeopardise certification but may raise concerns on conformity of the organisation, the Scheme Owner shall require that the audit firm increase the sample size to ensure</p>	<p>Applicable to schemes with IMS</p>	<ul style="list-style-type: none"> • Can the sample increase be prescribed directly by the scheme owner using the scheme risk analysis? 	<ul style="list-style-type: none"> • This criterion requires the sample size to be increased, the methodology is used to do so is up to the scheme. 	<p>In the case of certification schemes, if non-conformities are found which may not jeopardise certification but may raise concerns on conformity of the organisation, the Scheme Owner shall require that the audit firm increase the sample size to ensure adequate confidence in the conformity of the organisation.</p>

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
adequate confidence in the conformity of the organisation.				

D6. Group Certification (Follow-up Action)

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion
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Note: IMS is an Internal Management System.

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
D6.01 The Scheme Owner shall require that non-conformities found on group members or sites be assessed to ascertain if these indicate an overall internal management system deficiency and therefore may be applicable to all or other group members or sites. If non-conformities relate to all or other group members or sites, corrective action shall be	Applicable to schemes with IMS	No comments received.	N/A	The Scheme Owner shall require that non-conformities found on group members or sites be assessed to ascertain if these indicate an overall internal management system deficiency and therefore may be applicable to all or other group members or sites. If non-conformities relate to all or other group members or sites, corrective action shall be

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undertaken and verified both by the central function and by the audit firm.				undertaken and verified both by the central function and by the audit firm.
D6.02 In the case of certification schemes, if the central function or any group member or site fails to meet the critical scheme requirements, the Scheme Owner shall require that the whole organisation will fail to gain certification. Where certification has previously been in place, this shall initiate the audit firm process to suspend or withdraw its certification.	Applicable to schemes with or without IMS	No comments received.	N/A	In the case of certification schemes, if the central function or any group member or site fails to meet the critical scheme requirements, the Scheme Owner shall require that the whole organisation will fail to gain certification. Where certification has previously been in place, this shall initiate the audit firm process to suspend or withdraw its certification.
D6.03 The Scheme owner shall determine the methodology for issuing certificates/audit reports to the central function and the group member or sites. Either: - certificate/audit reports are issued to the central function of the producer group or multi-site organisation; or - separate certificates/audit reports are issued to group members or sites	Applicable to schemes with or without IMS	No comments received.	N/A	The Scheme owner shall determine the methodology for issuing certificates/audit reports to the central function and the group member or sites. Either: - certificate/audit reports are issued to the central function of the producer group or multi-site organisation; or - separate certificates/audit reports are issued to group members or sites of the group or multisite organisation

Draft Benchmarking Criteria	Applicability	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>of the group or multisite organisation that were audited as part of the sample plan.</p> <p>Those certificates/audit reports must be clearly distinguishable from certificates/audit reports that are issued to individually audited companies.</p> <p>The certificate/audit report must state explicitly that the recipient is part of a producer group or multi-site organisation, and any limitations to the scope of certification/audit report must be transparent to customers.</p>				<p>that were audited as part of the sample plan.</p> <p>Those certificates/audit reports must be clearly distinguishable from certificates/audit reports that are issued to individually audited companies.</p> <p>The certificate/audit report must state explicitly that the recipient is part of a producer group or multi-site organisation, and any limitations to the scope of certification/audit report must be transparent to customers.</p>
<p>D6.04 If a group member or site is allowed to sell their product outside of the producer group or multi-site organisation, the Scheme Owner shall require that the group member or site be transparent about the source and scope of the audit, by providing customers with a copy of the certificate/audit report when requested.</p>	<p>Applicable to schemes with or without IMS</p>	<p>No comments received.</p>		<p>If a group member or site is allowed to sell their product outside of the producer group or multi-site organisation, the Scheme Owner shall require that the group member or site be transparent about the source and scope of the audit, by providing customers with a copy of the certificate/audit report when requested.</p>

Anti-Trust Caution

Introduction

Set out below is a proposed caution. The aim of this is to serve as a reminder to all participants of the antitrust law requirements.

Anti-trust caution

As representatives of Association members, it is our shared responsibility to ensure that this meeting is conducted in accordance with the Statutes of the Association which state:

"The association shall not enter into any discussion, activity or conduct that may infringe, on its part or on the part of its members, any applicable competition law. By way of example, members shall not discuss, communicate or exchange, any commercially sensitive information, including information relating to prices, marketing and advertising strategy, costs and revenues, trading terms and conditions with third parties, including purchasing strategy, terms of supply, trade programs, or distribution strategy"

Even though you will all have had antitrust training in your respective companies and been in situations like this many times before, we would nonetheless remind you that aside from the obvious violations, you should at all times refrain from discussing any company-specific information which is confidential and that you should not agree anything that limits the ability of companies to compete independently in the market place. You are best placed to judge what is and what is not commercially sensitive or confidential, and what are the relevant parameters of competing. Remember that these parameters may include the Sustainability strategy of your company, and you should not disclose confidential information relating to it.

Please also remember that failure to comply with antitrust laws may lead to serious consequences for you as an individual, for your companies and for TCGF itself. Such consequences include severe fines, private actions for damages and the imposition of criminal penalties, including imprisonment, under national laws.

With this brief antitrust admonition, we look forward to a successful meeting.