SSCI Benchmarking Assessment Report

Contents

1. Application Information

1.1. Benchmark assessment team and date

Scheme Owner name(s)	Asociación Colombiana de Exportadores de Flores (ASOCOLFLORES)
Scheme Owner name and address	ASOCOLFLORES Cra. 9a #90-53, Bogotá, Colombia
Scheme Owner name, email, contact number	ASOCOLFLORES Daniela España, Managing Director, Florverde Sustainable Flowers daniela.espana@florverde.org (+57) 3173647339
Date of previous application (if applicable)	N/A
Benchmark Leader name and contact details	Reuben Levy, Reuben@LevyCR.com
SSCI Technical Manager name	Luiza Reguse l.reguse@theconsumergoodsforum.com
Observers name	N/A
Interpreter's name (if applicable)	The SSCI Senior Manager, present in the call, was available to interpret and translate from Spanish to English when needed.
Date of this office assessment	Office Visit conducted November 29-30, 2023
Language (e.g., English or other)	English and Spanish

1.2. Benchmark assessment scopes

	SSCI Scopes of Recognition	Scopes of Recognition Applied For
AI	Processing and Manufacturing	NO
BI	Primary Production	YES
CI	At-Sea Operations	NO

2. Executive Summary and Recommendations to the Steering Committee

2.1.   Executive summary

Since 1973, Asociación Colombiana de Exportadores de Flores ("ASOCOLFLORES") has served to represent, promote, and strengthen the competitiveness of Colombia's floriculture domestically and in international markets.[1] In 1996, ASOCOLFLORES created the social and environmental program Florverde, later called, "Florverde Sustainable Flowers" ("FSF"), in order to develop, promote, and implement responsible codes of conduct, standards, and sustainable agricultural practices. Currently, FSF remains an independent social and environmental standard in the floriculture sector.[2]

The FSF certification scheme provides the standards a framework for certification of farms, which produce flowers and ornamental plants, by independent third-party Certification Bodies. This scheme intends to ensure that only those products whose processes meet the quality, environmental, and social requirements set in the FSF normative documents are certified. Normative documents of the FSF certification scheme include the "Standard for Sustainable Production of Flowers and Ornamentals" (updated as version 7.1.3, obligatory as of March 1, 2024)[3] and the "General Regulation for the Florverde Sustainable Flowers Certification" (currently, version updated as version 7.1.3, obligatory as of March 1, 2024).[4]

FSF intends that its Standard helps producers strengthen their internal processes with the implementation of sustainable practices and assure consumers that they are purchasing a quality product that is produced in a socially and environmentally responsible manner. The Standard contains requirements and compliance criteria against which the processes related to the production of the flowers and ornamentals are evaluated and certified. The Regulation document describes how the Standard should be implemented, evaluated, and reported upon.

Despite the large number of Partly and Non-Aligned criteria at the initial Desktop Review, Florverde proved to maintain a well-established, robust program, and its team demonstrated commitment to continually improving the program to align with best practices. In the beginning of the Benchmarking process the Floverde team was able to correct perceived performance gaps by providing clearer evidence. Subsequently, the Florvede team proved diligent in revising their Standard and Regulations, reviewing the identified gaps, drafting and redrafting new content, and upgrading and communicating these revised normative documents. Proportionally, those revisions required the longest time during the SSCI Benchmarking process and, exacerbated by turnover in Florverde's Managing Director position, that period extended longer than originally anticipated. However, Florverde appeared to remain committed to SSCI Recognition and, once the BL confirmed that all draft

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[1] https://www.florverde.org/en/about-us-who-are-we/
[2] https://www.florverde.org/en/about-us-who-are-we/#history
[3] https://www.florverde.org/wp-content/uploads/2023/09/202309_EstandarFSF_V7.1.3_English.pdf
[4] https://www.florverde.org/en/how-to-get-fsf-get-certified/#standard

language aligned with SSCI criteria, published and communicated updated normative documents.

During the Office Visit at Florverde headquarters, Florverde representatives were engaged, cooperative, transparent, and receptive. Although the BL identified eight Partly or Non-Aligned criteria, the Florverde team developed and closed those with a strong corrective action plan, addressing immediate actions, with processes in place to ensure ongoing implementation.

Florverde provided necessary evidence and demonstrated its capacity for the Florverde Sustainable Flowers scheme to attain SSCI recognition.

2.2. Result of the public consultation
Public consultation pending (tbd: feb 2024).

2.3. Recommendation to the SSCI Steering Committee
Based on Florverde's transparency, cooperation, receptiveness, diligence, and commitment in aligning its Florverde Sustainable Flowers Scheme with SSCI criteria, the BL found that the Scheme Owner had established the necessary programmatic foundations for alignment with SSCI.

The BL recommends that the SSCI Steering Committee recognize Florverde Sustainable Flowers, with the understanding that recent revisions to the Scheme's policies and processes will be assessed in a future Monitoring of Continuous Alignment (MoCA) process.

3. Results of Assessment and Office Visit

3.1.   Time and location details

	Location	People present (e.g., SSCI, consultant, Scheme Owner. Names and roles)	Date and time
Self-assessment desktop review	Five reviews by BL, including benchmarking of initially submitted materials and draft revisions, followed by confirmation of finally published updates	**FSF Team:** Martha Lucía Méndez (Managing Director, through March 2023), Daniela España (Managing Director, starting July 2023), Hugo Fernando Montero (Standard Coordinator), Maria Fernanda Rojas Robayo (Consultant) **SSCI Team:** Luiza Reguse Senior Manager **BL:** Reuben Levy	Between November 2022 and September 2023
Feedback calls	Conducted via Zoom	**FSF Team:** Martha Lucía Méndez, Hugo Fernando Montero, Maria Fernanda Rojas Robayo **SSCI Team:** Luiza Reguse **BL:** Reuben Levy	January 4 and 19, February 2 and 7, 2023
Office visit	Florverde Headquarters	**FSF Team:** Daniela España, Hugo Fernando Montero, Maria Fernanda Rojas Robayo **SSCI Team:** Luiza Reguse **BL:** Reuben Levy	November 29-30, 2023

3.2.   Overview

▶ On August 8, 2022, the Florverde team submitted its application for Florverde Sustainable Flowers to attain SSCI recognition.

▶ On November 24, The Florverde team initially submitted its Self-Assessment Questionnaire (SAQ), based on FSF Standard v7.1.2 and Regulations v7.1.2.

▶ On December 21, the BL completed the initial Desktop Review, which he sent to the Florverde team. In it, the BL identified 28 perceived Partly Aligned and 17 perceived Non-Aligned Scheme Management criteria and 43 Partly Aligned and 9 Non-Aligned Social criteria.

▶ On January 3, 2023, the Florverde team responded by providing an updated SAQ and additional evidence.

▶ On January 4, the BL, SSCI Program Officer, and Florverde representatives conducted the first Desktop Review call. Because of the large number of initial misalignments which required changes to the normative documents, the SSCI team offered the opportunity for the Florverde team to provide draft text, which the BL would review, prior to Florverde instituting changes. The SSCI team explained that the BL could review such draft text and confirm and justify whether or not it aligned with SSCI criteria; however, he could not serve as a consultant that offers recommendations. The Florverde team agreed to this plan.

▶ Over the next six months, the Florverde drafted a series of nine sets of revisions, which the BL reviewed and returned with his comments. During this period, the BL and Florverde team conducted an additional three Desktop Review Calls on January 19, February 2, and February 7, and the BL received, reviewed, and commented via email on revisions to the SAQ and evidence through June.

▶ Following Florverde's staffing changes, on July 13, the BL and SSCI Senior Manager conducted a briefing call with the new Managing Director to explain the status of the Benchmarking project, planned next steps, and outstanding requirements.

▶ In September 2023, the Florverde team published the FSF Standard v7.1.3 and Regulation v7.1.3. After confirming that the newly published normative documents included the necessary content, the BL began planning the Office Visit.

▶ On November 1, Florverde representatives and the BL held a virtual meeting to view FSF's audit management platform, in order for the BL to identify documents to potentially request during the Office Visit.

▶ Prior to the Office Visit, on November 3, the BL sent a list of 10 potential audit reports, from which the BL would sample during the Office Visit, requiring that each of these audit reports, their related evidence and follow-up documentation, and previous audits and CAPs of "Recertifications" or "Unannounced Inspections/Audits" were translated to English. On November 16, the BL sent the Florverde team a draft agenda for the Office Visit.

▶ The BL conducted the Office Visit on November 29-30, at the Florverde headquarters. Florverde representatives were engaged, cooperative, transparent, and receptive throughout the Office Visit. The Office Visit was conducted in English, with some translation conducted by meeting participants for clarification purposes. All sampled audit reports were translated to English, and any non-English content was translated to English during the meeting by Florverde representatives.

▶ During the Office Visit, the BL reviewed six complaints/appeals and four audits, including one Initial Audit in Ecuador, two Recertification Audits in Colombia, and one Unannounced Group Certification Audit in Colombia.

▶ During the Office Visit, the BL found two Non-Aligned criteria, comprising A5.01 and A5.06 (Standard Setting and Maintenance), and six Partly Aligned criteria, comprising A5.02 and A5.03 (Standard Setting and Maintenance) and B4.09, B4.10, B4.11, and B4.12 (Audit Protocol).

▶ On January 18, 2024, the Florverde Team provided evidence, which the BL and SSCI Senior Manager agreed as sufficient for documenting closed CAPs and for which implementation could be assessed during the future MoCA process.

4. General Compliance, Strengths, and Weaknesses

4.1.   Summary

▸ Despite the large number of Partly and Non-Aligned criteria at the in the initial Desktop Review, Florverde proved to maintain a well-established, robust program, and its team demonstrated commitment to continually improving the program to align with best practices. In many cases, the Floverde team was able to correct perceived performance gaps by providing clearer evidence.

▸ Additionally, the Florvede team was diligent in revising their Standard and Regulations, reviewing the identified gaps, drafting and redrafting new content, and upgrading and communicating these revised normative documents. Proportionally, those revisions required the longest time during the SSCI Benchmarking process and, exacerbated by turnover in Florverde's Managing Director position, that period extended longer than originally anticipated. However, Florverde appeared to remain committed to attaining SSCI Recognition and, once the BL confirmed that all draft language aligned with SSCI criteria, published and communicated new normative documents.

▸ As Florverde expanded its program from Colombia into Ecuador, it was clear that the organization focused on maintaining controls and consistency.

▸ Florverde works with relatively few Certification Bodies, which enables the staff to know and train these firms' representatives and auditors. However, this did not inhibit the organization from severing ties with one Certification Body that was consistently underperforming. During review of complaints and appeals, it was clear that this Certification Body was the subject of multiple inquiries, and therefore, the BL requested clarification and evidence of the Certification Body's status. The Florverde team provided evidence of how concerns came to their attention, how Florverde sought to work with the Certification Body to remedy the issues, and ultimately how Florverde terminated the business relationship.

▸ Although the Desktop Review process concluded with all criteria aligned, the Office Visit's deeper examination did reveal eight Partly or Non-Aligned criteria. The Florverde team took quick action to remedy these issues, and their evidence proved sufficient for recommending SSCI Recognition; however, as these changes are recent, it will be crucial that the BL assesses their implementation during the MoCA process. These include:

  o *Standard Setting and Maintenance* – Establishment of a Document Register describing versions of all current normative documents, policies, and procedures; Making publicly available Florverde's process for developing, revising, and approving its Standard; Maintaining formal records for key meetings during which decisions are made; Ensuring a set maximum period after normative documents must be reviewed and revised.

  o *Audit Protocol* – Formally address how translators may be involved during audits and how their involvement is to be documented; Revise Audit Report template to ensure that worker and management interviews are documented in a way that demonstrate whether or not they are aligned with FSF General Regulation.

4.2.   Changes made to the Scheme following the benchmarking assessment

Based on the SSCI Benchmarking Process and the BL's findings, Florverde enhanced procedures and updated and clarified policies to align with SSCI criteria. Changes to Social and Scheme Management Standards include:

▸ **Social –** Florverde revised language in its normative documents to align with the SSCI Social Standard, addressing 52 criteria across Forced Labor, Child Labor, OHS, Chemical Management, Building Safety and Emergency Preparedness, Wages, Working Hours, Grievance Mechanism, Business Ethics, and Community Impacts / Responsible Farming Practices.

▸ **Scheme Management – Scheme Governance,** Formalizing foundational policies; Formalizing a complaints procedure and making it publicly available.

▸ **Scheme Management – Integrity Program,** Enhancing processes for evaluating Certification Bodies.

▸ **Scheme Management – Standard Setting and Maintenance,** Formalizing and better documenting process for developing, revising, and approving the Standard, as well as ensuring a 60-day public consultation period.

▸ **Scheme Management – Auditor Competence,** Updating training and experience thresholds.

▸ **Scheme Management – Audit Protocol and Reporting,** Formally addressing how translators may be involved during audits and how their involvement is to be documented; Revising Audit Report template to ensure that worker and management interviews are documented in a way that demonstrate whether or not they are aligned with FSF General Regulations; Ensuring process for auditors to alert key individuals in cases of imminent dangers.

▸ **Scheme Management – Follow-up Action,** Formally documenting processes for when desktop review versus onsite reviews are applied.

▸ **Scheme Management – Group Certification,** Increasing sample of sites in group audit; expanding and deepening requirements for Groups' internal audit functions.

4.3. List of findings – Desktop Review and Office Visit

Following Florverde's submission of evidence, on January 18, 2024, demonstrating closure of all Partly and Non-Aligned criteria, no findings remain, and the BL and SSCI Senior Manager deemed that all criteria are aligned. For illustrative purposes, the findings identified during the Office Visit and Florverde's respective corrective actions are displayed below. The BL and SSCI Senior Manager approved Florverde's corrective actions by means of desktop review, and the BL will evaluate Florverde's sustained implementation of these actions during the MoCA.

SSCI Scheme Management Criteria	Criteria Description / Non-conformity	Action from Scheme Owner	Status
A5.01	*SSCI Requirement: The Scheme Owner shall have a document control procedure in place to ensure that all of the scheme's normative documents are <u>appropriately controlled</u> and publicly available.* Florverde does not maintain a "Document Register" or "Master List" describing versions of all current normative documents, policies, and procedures.	**1) Development of a Master List of Normative Documents** • Created a master list containing all normative documents of the Florverde Sustainable Flowers Certification Scheme. This list will facilitate control and process operation, ensuring the proper update, availability, and use of the documents. **Responsible:** Technical and Administrative Secretariat of FSF. **2) Inclusion in the Document Update Procedure** • Integrated the Master List of Florverde Documents, version 3.0, into the procedure for updating normative documents. This process will ensure consistency between the list and the corresponding documents. **Implementation Date:** January 3, 2024. **Responsible:** Technical and Administrative Secretariat of FSF. **3) Publication on the Florverde Website** • Published the Master List of Florverde Sustainable Flowers Normative Documents on the Florverde website. Available online on January 15, 2024, ensuring transparency and public access.	Closed

SSCI Scheme Management Criteria	Criteria Description / Non-conformity	Action from Scheme Owner	Status
		Responsible: Technical and Administrative Secretariat of FSF.	
A5.02	*SSCI Requirement: The Scheme Owner shall have publicly available procedures for the process under which each standard is developed, approved and revised.* Florverde's Procedure on Revision and Approval of the Standard is not publicly available.	• Published on the Florverde website the Procedure for the update of normative documents for Florverde Sustainable Flowers, Version: 3.0, with an effective date of January 3, 2024. • The procedure was made available on the Florverde website starting from January 15, 2024.	Closed
A5.03	*SSCI Requirement: The Scheme Owner shall ensure participation of technical experts and encourages balanced participation by stakeholders in the standard development, revision and approval process.* No minutes or other evidence exist from the meeting when v7.1.3 Standard and Regulations were approved by the Technical Committee.	• On December 6, 2023, the Technical and Administrative Secretariat of FSF drafted the minutes of the last Technical Committee FSF meeting held on August 24, 2023. During this meeting, the edition changes made to the Standard for sustainable flower and ornamental production and the General Regulation for Florverde Sustainable Flowers certification were presented and discussed. These adjustments were implemented to address the identified gaps in the benchmarking with SSCI. It is important to note that the changes made to some requirements of the Standard and the General Regulation are editorial in nature and do not imply version changes. • On December 7, 2023, the Technical and Administrative Secretariat of FSF emailed the minutes of the August 24, 2023 meeting to the members of the FSF Technical Committee. In the same communication, confirmation and approval of the receipt of the email was requested from the Technical Committee members.	Closed

SSCI Scheme Management Criteria	Criteria Description / Non-conformity	Action from Scheme Owner	Status
A5.06	*SSCI Requirement: The Scheme Owner reviews standards at least <u>every five years</u> for continued relevance and for effectiveness in meeting their stated objectives and, if necessary, revises them in a timely manner.* Version 7 of the Standard and Regulations is over 5 years old.	• Version 7.1.3 is 5 years old, however, editing adjustments have been made to ensure its up-to-date, such as: 7.0-1 July 2017 7.0-2 May 2018 7.1 October 2018 7.1.1 July 2020 7.1.2 July 2021 7.1.3 September 2023 • FSF's Technical and Administrative Secretariat has already started the process of updating Florverde's regulatory documents in their version 7 and is expected to complete the updating process in September 2024 by moving forward with its versions 8.	Closed
B4.10, B4.12	*SSCI Requirement (B4.10): The Scheme Owner shall <u>define requirements for the appointment of translators</u> that audit firms are required to implement and make available. In all cases where translators are used, the Scheme Owner shall <u>guarantee their independence and confidentiality.</u>* *SSCI Requirement (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:* *- 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*	• Previously, in the General Regulations for the Florverde Sustainable Certification version 7.1.3, in its requirement 8.3, the planning and execution of evaluations stipulates that, if applicable, CB's must determine the need to have an interpreter or translator, independently of the company. This had not been recorded in the CB evaluation report. • The FSF Technical and Administrative Secretariat modified the Florverde evaluation report (inspection/audit) so that the CB records whether or not a translator was used, specifying which languages or dialects were required and confirming that any translators did not represent the management, guaranteeing independence and confidentiality. The new edition of the Assessment Report, which will be compulsory from March 1, 2024 (Responsible:	Closed

SSCI Scheme Management Criteria	Criteria Description / Non-conformity	Action from Scheme Owner	Status
	non-attributable manner *- Workers shall be <u>interviewed in their own language</u>* *- 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,<u> management, supervisors or their representatives shall not act as interpreters</u>* Report does not mention whether or not translator is used, what languages may have been required, and confirmation that any translator did not represent management.	FSF Technical and Administrative Secretariat), was be sent to the Committee of Stakeholders on January 17, 2024.	
B4.09, B4.11, B4.12	*SSCI Requirement (4.09): The Scheme Owner shall require that audits include <u>worker and management interviews,</u> the observation of processes and activities and the review of relevant documentation and records.* *SSCI Requirement (B4.11): The Scheme Owner shall define the <u>methodology for defining the number of workers to be interviewed</u>. Interviewed workers shall reflect a <u>wide range of workers and include potentially vulnerable workers and those in less skilled positions.</u>* *SSCI Requirement (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:* *- Workers shall be interviewed both <u>individually and in groups</u>*	• In the General Regulations for the Sustainable Florverde Certification in its version 7.1.3 in its numbers 8.2.6 Duration of the evaluations and 8.3 Planning and execution of evaluations, establishes the number of group and individual interviews and also that the sample of employees selected for the interview is representative by characteristics such as: type of linkage, position, gender, age, service age and origin. It also stipulates that interviews should be targeted with priority to potentially vulnerable workers and those in lower-qualified positions. This is not recorded in the OC evaluation report. • The Technical and Administrative Secretariat of FSF will modify the Florverde evaluation report (inspection/audit) so that the CB records the number of individual and group interviews conducted to employees and included managers of the company, in addition it must describe the	Closed

SSCI Scheme Management Criteria	Criteria Description / Non-conformity	Action from Scheme Owner	Status
	- 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* *- 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* Worker and management Interviews are not summarized in the report, and therefore, it is not possible to confirm that each auditor has conducted the appropriate number of individual/group interviews or what management representatives participated.	characteristics of the sample of workers taken, taking into account: type of linkage, position (priority lowest-qualified posts), gender, age, service age and origin. The new edition of the Evaluation Report was sent to the CBs on January 17, 2024 and will be mandatory from March 1, 2024.	

5. Results of the Public Stakeholder Consultation

5.1.   Summary

Public consultation pending.

5.2.   List of findings – Public Stakeholder Consultation

Criterion Number, Chapter	List of issues raised	Answer from Scheme Owner	Recommendation from Benchmark leader	Decision from SSCI Manager