

FAIR FOR LIFE

SOCIAL & FAIR TRADE CERTIFICATION PROGRAMME

2. CONSULTATION DRAFT VERSION JULY 2013



CONTROL MODULE 1: LABELLING AND CONTROL CRITERIA

CONTROL MODULES OF THE FAIR FOR LIFE PROGRAMME

1. LABELLING AND CONTROL CRITERIA

Presented in this section

2. CRITERIA FOR HIRED LABOUR OPERATIONS

Module 2, see separate document

3. CRITERIA FOR PRODUCER GROUPS

Module 3, see separate document

4. CRITERIA FOR HANDLING OPERATIONS

Module 4, see separate document

5. CRITERIA FOR PROCESSING AND ARTISAN OPERATIONS

Module 5, see separate document

6. CRITERIA FOR WILD COLLECTION OPERATIONS

Module 6, see separate document

7. CRITERIA FOR MINING OPERATIONS

Module 7, see separate document

8. CRITERIA FOR TOURISTIC SERVICES

Module 8, see separate document

9. INTEGRATED PRODUCTION CRITERIA

Module 9, see separate document

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1 LABELLING AND CONTROL CRITERIA

1.1 FAIR FOR LIFE – SOCIAL & FAIR TRADE CERTIFICATION

1.1.1 Product Labelling

Principle 1.1.1 Products labelled under the Fair for Life Social & Fair Trade programme are made from Fair Trade certified ingredients. The products need to be fully traceable and handled in a responsible way.

- a) Only products certified according to the Fair for Life Certification Programme by the Fair for Life certification body (CB) and indicated on a valid Fair for Life certificate may be labelled as Fair for Life Fair Trade certified. All consumer package product labels must be submitted to the CB for approval before printing.

Fair for Life has two product labelling categories, “Fair for Life – Social & Fair Trade certified products” and “Products made with Fair for Life Fair Trade ingredients”. Additionally, indication of Fair Trade origin in the ingredient statement is possible.

A product may be labelled as “Fair for Life - Social & Fair Trade certified by <CB>” (with or without the logo “Fair for Life”) if the following conditions are met:

A. Labelling Requirements Fair for Life - Social & Fair Trade Certified Products	
Origin of Raw Material	<p>a) In a Fair for Life certified product, the ingredients are Fair for Life certified or certified according to another approved fair trade certification scheme (Annex 2).</p> <p><i>See Annexes 3 - 5 for detailed minimum composition rules for different product types (e.g. food products, cosmetics, textiles)</i></p>
Processing and Handling	<p>b) Fair for Life certified products are traded along the chain of custody by certified or registered handlers as defined in chapter 1.1.3</p>
Traceability	<p>c) The Fair for Life certified product and its Fair Trade certified ingredients are traceable and kept separate from non-Fair Trade certified products or ingredients.</p> <p><i>Fair for Life accepts a maximum of 5% commingling in cases where processing technology does not allow for 100% separation during processing without substantial loss of products; extraordinary exceptions see Annex 6.</i></p>
Product Labelling	<p>d) On Fair for Life certified products, use of the Fair for Life certification seal is permitted on the principal display panel (front label) and anywhere on the packaging. Use of the Fair for Life seal is optional. Other references to Fair for Life Fair Trade certification are permitted as text anywhere on the product label. Reference texts shall be worded as follows:</p> <ul style="list-style-type: none"> • “Fair for Life Social & Fair Trade certified by <CB>” or “Fair for Life Fair Trade certified by <CB>” • “Fair Trade certified by <CB>” or “Social & Fair Trade certified by <CB>” may be used if the product label (front, side or back panel) indicates also the following statement: “This product is certified by <CB> according to the Fair for Life Programme” Other wording may be approved on request. • In the ingredient list the Fair Trade certified ingredients must be <i>asterisked</i> and the indication “Fair for Life Fair Trade certified ingredient” or “* Fair Trade ingredient according to the Fair for Life Programme” displayed under the ingredient list. • The fair trade content (in % of all agricultural and botanical ingredients) shall be displayed on the label, e.g. under the ingredient list. <p><i>It may have the form of “this product contains at least XX% Fair for Life certified ingredients” or “Fair Trade certified content at least XX%” rather than indicating the exact percentage.</i></p> <p>The company may also indicate other truthful information, e.g. “made in a company that is Social Responsibility and Fair Trade certified” or “from Ethical and Fair Trade Production” as applicable.</p>

For products which contain a substantial amount of Fair Trade ingredients but which do not meet the minimum labelling rules for Fair for Life certified products the labelling category “Products made with Specified Fair for Life Fair Trade ingredients” applies.

B. Labelling Requirements For Products Made with Fair Trade Ingredients	
Origin of Raw Material	<p>e) Products made with Fair Trade ingredients contain a substantial percentage of ingredients that are Fair for Life certified or come from another certified fair trade origin (see Annex 2) but the minimum requirements for labelling as Fair for Life certified product are not met.</p> <p><i>See Annexes 3-5 to this document for detailed minimum content composition rules for different product types (e.g. food products, cosmetics, textiles) and extraordinary exceptions in Annex 6.</i></p>
Processing and Handling	<p>f) Products made with Fair Trade ingredients are traded along the chain of custody by certified or registered handlers as defined in chapter 1.1.3</p>
Traceability	<p>g) In products made with Fair Trade ingredients, the certified ingredients are traceable and kept separate from non-Fair Trade certified products.</p> <p><i>Fair for Life accepts a maximum of 5% commingling in cases where processing technology does not allow for 100% separation during processing without substantial loss of products (continuous processing lines).</i></p>
Product Labelling	<p>h) On products made with Fair Trade ingredients, the use of the Fair for Life certification seal is NOT permitted on the Principal Display Panel (front label). A small version of the Fair for Life seal may be used on the back or side panel.</p> <p>i) The indication “XX % Fair Trade content” must be displayed visually close to the seal, according to the separate labelling guidelines.</p> <p><i>The indication may be “this product contains at least XX% Fair for Life certified ingredients” or “Fair Trade certified content at least XX%” rather than the exact percentage.</i></p> <p>j) Label claims of products made with Fair Trade ingredients are restricted:</p> <ol style="list-style-type: none"> i. On the Principal Display Panel, references may be made to the Fair Trade certified origin of specified ingredients. Such indications must take the form of <ul style="list-style-type: none"> - “made with Fair for Life Fair Trade certified [...]” (e.g. “made with Fair for Life Fair Trade certified shea butter”) - or “made with Fair Trade certified [...]” if the product label (front, side or back panel) indicates also the following statement: “This product is made with Fair Trade ingredients and is certified by <CB> according to the Fair for Life Programme”, other wording may be approved on request. ii. The indications must appear in a colour, size and style of lettering which is not more prominent than the sales description text of the product; in the indication the words “Fair for Life Fair Trade certified” shall not be more prominent than the rest of the statement. iii. In the ingredient list the Fair Trade certified ingredients must be asterisked and the indication “Fair for Life Fair Trade certified ingredient” or “* Fair Trade ingredient according to the Fair for Life Programme” displayed under the ingredient list. iv. The company may also indicate other truthful information, e.g. “made in a company that is Social Responsibility and Fair Trade certified” as applicable. v. The information anywhere on the label or in product advertising must state clearly that the product contains Fair for Life Fair Trade certified ingredients. It is not permitted to refer to the entire product to be “Fair Trade certified” or “Fair for Life certified”.

There is also the option to only indicate the Fair for Life Fair Trade quality in the ingredients statement of a product.

Rules for Reference to Fair for Life Fair Trade Ingredients in Ingredients Statement only	
Origin of Raw Material	k) A small part of ingredients is Fair for Life certified and/or the other requirements for product labelling are not met.
Processing and Handling	l) For indication of Fair for Life certified ingredients in the ingredient list, the Fair Trade buyer of the respective Fair for Life ingredient who buys the product from the Fair Trade producer operation must be a Fair for Life certified handler. The company responsible for the final consumer packaging, and hence the reference to the Fair for Life certified origin of an ingredient, must register with the Fair for Life certification body. They must submit documentary proof that the ingredient used originates from a certified Fair for Life supply chain (producer and Fair Trade buyer). <i>As an exception, Fair for Life certified handling companies which are selling directly to a brand holder company who wishes to indicate the Fair Trade quality in their ingredient statement to consumers, can offer their clients to cover this additional product labelling as part of their own Fair Trade handler verification. In this case the Fair for Life certified handler submits his customers' final product label samples to the certification body for approval and demonstrates the product flow to the labelling company during the audit.</i>
Traceability	m) The registered handler of the product indicating Fair for Life certified ingredients in the ingredient statement must confirm traceability to Fair for Life production in the registration process.
Use of Label and References to Certification	n) Reference to Fair for Life certification on labels is strongly restricted: <ul style="list-style-type: none"> • Only permitted on the side or back label, directly under the ingredient statement. The Fair for Life ingredients must be indicated with a "*" and the indication "Fair for Life Fair Trade certified ingredient". • The indication must appear in a colour, size and style of lettering which is not more prominent than the rest of the ingredient statement; in this indication the words "Fair for Life Fair Trade certified" shall not be more prominent than the rest of the statement. • No reference to Fair for Life certification is permitted in general advertising or product information text.

1.1.2 Control Requirements for Fair for Life Producer Operations

Principle 1.1.2 All Fair for Life Fair Trade producer operations commit to an annual complete audit and certification of their activities. All Fair for Life products must be fully traceable and labelled.

- a) Every Fair for Life producer operation commits by certification contract to a complete annual audit and certification of their activities against the applicable Fair for Life certification module.

The audit and certification process is described in chapter 1.3 of this document.

*The producer certification also includes any processing activities by the same operator on site, e.g. on a tea estate both the agricultural production and the crude onsite processing factory are covered by the same Fair for Life hired labour producer certification. With hired labour this normally means that both the workers on the estate as well as in the onsite factory are the intended beneficiaries of the Fair Trade Development Premium (unless a different setting is justified in the Fair Trade Policy) and that the full set of Fair for Life requirements (Module 2, section 2.1 to 2.5) apply to both the agricultural unit and the processing site. In producer groups, small to medium scale processing operations are included in the producer group module 3. Large processing factories (**more than approximately 20 permanent workers or more than 70 workers in total for more than approximately 2 months per year**) are subject to full additional Social Responsibility control of the processing unit (Module 2, sections 2.1 to 2.4).*

If the Fair for Life product is processed further in a processing unit at another location (e.g. a tea refining factory) and if this unit is owned by the same producer operation, the unit is considered part of the producer operation's Fair for Life certification and must undergo Fair for Life Social Responsibility certification or equivalent. The unit and the final processed products will be listed on the producer operation's Fair for Life certificate. Potentially, Fair for Life certification (with Fair Trade Premium also for workers in that unit) may be possible if justified in the Fair Trade Policy.

If the product is processed further in a unit owned by the producer operation's mother company, this unit can either be considered under part of the producer operation's certification or as an "intermediate handler" and must hence be registered and be able to demonstrate traceability and decent working conditions - see Fair for Life

handlers (Module 4, chapter 4.4). If the unit is kept under the producer operation's certification, the unit will need to undergo full Social Responsibility certification and the final processed product and the processing unit will be listed on the producer operation's certificate.

Specific rules apply if the producer operation subcontracts processing of their products - see control procedures in chapter 1.1.3.4 and the applicable requirements for subcontracted processors in Module 4, section 4.4.

Once the Fair Trade producer company (or the producer company's mother company) sells the product to a Fair Trade buyer, the Fair Trade handler criteria (Module 4) apply for the remainder of the supply chain.

- b) The operation commits to continuous compliance with the Fair for Life standards and to grant the certification body unrestricted access to facilities, documentation and confidential interviews with workers and staff and permits unannounced audits.
- c) The operation is aware of applicable Fair for Life certification requirements and has performed a basic risk assessment against all aspects of the standards

During the application process the certification body will inform the applicant of all applicable control modules of the Fair for Life programme and how to download them. In preparation for the first audit, the operation is expected to carry out a basic self assessment of present performance and potential risks in all applicable aspects of the standard. The Fair for Life programme can be used as a self-assessment form, or the company can use the chapters of the applicable control modules to prepare its own risk assessment and discuss initial ideas for improvement in any field of weak performance.

This self-assessment raises awareness of any risks and as such helps in the preparation for an operation. It is not counter-checked by the control body as a standard procedure.

- d) Fair for Life producer organisations ensure traceability and separation of the Fair for Life products as well as correct product labelling of all products sold as Fair for Life certified.

If the final consumer packaging and labelling is done by the producer operation (e.g. in case of fresh fruit), the producer can label only those products as Fair for Life certified that are sold to fair trade certified buyers and for which the fair price and fair trade premium is being paid.

If the products are packaged as Fair for Life certified but a substantial part regularly ends up being sold as non-fair trade (no premium and fair price to producers for this sale) in retail, the Fair for Life reference has to be removed (e.g. removing the stickers) or these products should not be labelled in origin.

Fair for Life accepts that in case of perishable products in a small percentage of products each year will be waste products or may be donated to charities, or need to be spot-sold quickly due to inferior quality and that taking off the references is not practicable in such emergency cases (but should be recorded and communicated to producer operation if it affects the amount of premium the producer operations receives).

The following control points apply to all For Life (SR) and Fair for Life (FT) producer operations (including Handler operation who chose to be For Life –Social Responsibility certified as well):

General Requirements:

No	Compliance Criteria Basic Control Requirements Fair for Life Producer Operations	OK	AC	NF	NA
1	The responsible manager or FT coordinator is present during the audit				
2	M from Yr2 = The opening meeting includes producer representatives (producer groups) and worker representatives (Hired Labour operations)				
3	M= The inspector has unrestricted access to all premises, documentation and staff				
4	M= The operation holds a valid Fair for Life certification contract with the Fair for Life certification body				
5	M= All production and handling steps of the certified products under the ownership of the operation are known , i.e. all project sites have been announced, all purchase centres are known, processing activities are known, etc. If not, has any certified production taken place in unannounced units?				
6	The operation is aware of Fair for Life certification requirements and has a basic understanding of its performance against the standard.				
7	M from year 2 = Workers / producers are informed about the company's certification status and their right to discuss confidential information about their working conditions with the auditor (e.g. pre-audit info displayed; or information				

	<i>meetings).</i>				
8	M from year 2 = Management have a process in place of informing workers and explain outcome of the certification process, as a part of this process they can invite representatives to the exit meeting.				

OK=requirement fulfilled; AC= acceptable with conditions; NF= not fulfilled; NA= not applicable; M= minimum requirement;

Traceability and Product Labelling:

No	Compliance Criteria: Traceability and Product Labelling	OK	AC	NF	N.A
1	M= There is a complete SR/FT assortment list; producer's production estimates are known.				
2	If any multi-ingredient product is to be certified: there are complete recipe sheets or composition tables and the certification status of each ingredient is known.				
3	M= If processor with certified products is to be certified: there is a complete list of suppliers of SR/FT certified raw materials with correct indication of certification status. Certification status is confirmed by certificates or similar documentation (e.g. FLO registration number and updated printout of active certification status).				
4	M= Composition and labelling requirements of chapters 1.2 (FT) or 1.3 (SR) have been verified and results are reflected in proposed correct label categories (certification table).				
5	M= SR/FT certified products are not commingled with any non-SR/FT certified products during handling, processing, storage or sales and are fully traceable from purchase to sales. <i>If all products are FT/SR certified → OK. If there is commingling due to technical reasons, please indicate extent and reasons below.</i>				
6	Sales of Fair for Life certified products to Fair for Life Fair Trade buyers: FT quality is indicated on invoices.				
7	All products sold as Fair for Life certified shall be packed in a way that the content cannot be replaced without manipulation or destruction of the packaging and shall be labelled with a clear designation of their Fair Trade nature – at least on accompanying documents.				
8	M= Any final consumer labels have been approved by the CB and comply with the labelling rules and restrictions indicated in Module 1, section 1.1.1.				
9	M = If there is a subcontracted processing operation, it is either exempted from registration (processing less than 10% Fair for Life products) or registered and traceability and decent working conditions are confirmed (Module 4, chapter 4.4.).				

OK=requirement fulfilled; AC= acceptable with conditions; NF= not fulfilled; NA= not applicable; M= minimum requirement

The following table gives an overview of some basic types of different Fair for Life producer operations (with associated activities such as processing) with applicable standard sections and control requirements:

Type of Operation	2.1–2.4 Social Responsibility Hired Labour	2.5 Fair Trade Aspects Hired Labour	3 Producer Groups (3.1-3.5)	4. Fair for Life Handler	Remarks	Certification Procedures „Fair for Life“ – Social & Fair Trade
Plantation, Estate, Farm with processing on site	X	X		*		Full annual audit and certification of each unit (e.g. plantation and factory)
Processing unit while	X	(X)		*	Depending on overall Fair Trade	Full annual audit and

product still owned by Fair for Life producer or producer mother company					Policy, Fair Trade focus may also be on processing workers, if this is the case then section 2.5 of Module 2 also applies.	certification
Smallholder Group or Contract Production			X	*		Full annual audit and certification of group operation
Group of medium-size farms			X	*	Big farms in the group must be certified as individual Fair for Life farms. See Module 3.	Full annual audit and certification of group operation
Producer Group processing activities small scale			X		Working conditions included in Module 3. Depending on overall Fair Trade Policy, Fair Trade focus may only be on agricultural production or maybe on workers also.	Included in group operation audit and certification of group operation
Producer Group processing activities large scale	X	(X)			See details in Module 3 for what scale full hired labour certification is required. Depending on overall Fair Trade Policy, Fair Trade focus may only be on agricultural production and not on processing.	Full hired labour audit and certification in addition to audit and certification of group activities
Contracted processor				X	Under the responsibility of the contractor	Registration as handler of Fair for Life products

**If the companies also act as buyers, i.e. buy from other certified companies, the criteria for Fair Trade handlers apply as well.*

Please note that there are also specifically adapted control modules for wild collection operations (Module 6), processing and artisan groups (Module 5) and mining operations (Module 7) which follow the same principles and control requirements as producer groups and modules for touristic services (Module 8) and hired labour mining operations (Module 7) which are based on hired labour requirements.

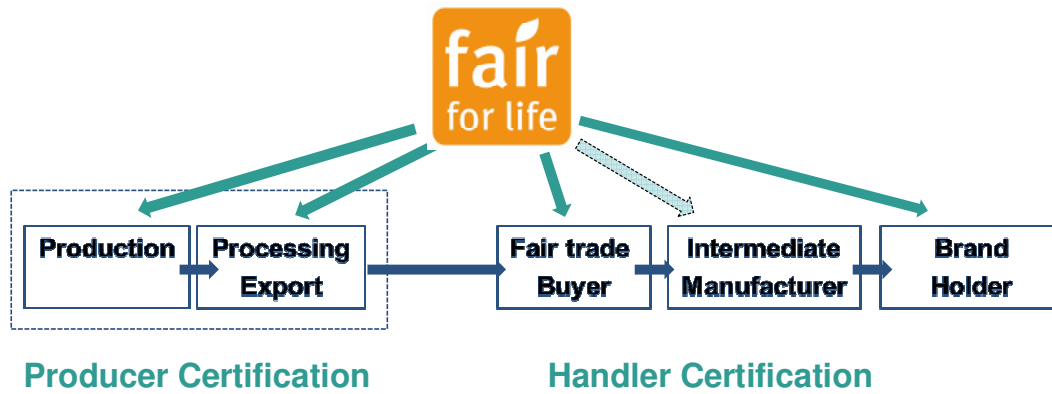
1.1.3 Control Requirements for Chain of Custody

Principle 1.1.3 Companies handling Fair for Life products apply fair sourcing practices and ensure product traceability as well as decent working conditions for their workers.

Overview

Companies buying directly from Fair Trade producer operations (Fair Trade buyers) and Fair for Life brand holders must undergo Fair for Life handling certification. However, a few exceptions apply for companies with only a very limited range of Fair for Life products. This gives Fair for Life producers the chance to market their product to a wide range of buyers and commodity chains with different final consumer brands.

Other intermediate traders may become certified Fair for Life handlers to demonstrate their fair sourcing practices and good working conditions, but as a minimum requirement they must become registered handlers of Fair for Life products and demonstrate separation, traceable product handling and decent working conditions.



If any products from other fair trade certified origins are bought in to be sold under Fair for Life, the Fair for Life handler requirements apply to the first company that buys these products—e.g. a manufacturer buying ingredients from Fair for Life supply chains as well as FLO Fairtrade certified suppliers.

In the sub-chapters below, generic requirements for all Fair for Life handlers are presented first. In the following sections, the three different handling operation types (Fair Trade buyer, brand holder, intermediate or contracted handling operation) and their respective control requirements, are defined in detail. The requirements are presented with regard to the function a handling operation has in the chain of custody, e.g. in a very short Fair Trade supply chain, the company sourcing from different Fair for Life Fair Trade certified producer groups could act as Fair Trade buyer as well as Fair for Life brand company for the final consumer packaged product

1.1.3.1 Basic Requirements for All Fair for Life Certified Handling Operations

- a) Every Fair for Life handling operation commits by certification contract to annual auditing and certification of their activities as set out in the Fair for Life handling operations Module 4.
The audit and certification process is described in chapter 1.3 of this document.
- b) The company commits to continuous compliance with the Fair for Life handling standards. It grants the certification body unrestricted access to facilities, documentation and confidential interviews with workers and staff and permits unannounced audits.

The following control points apply to all Fair for Life handling operations:

No	Compliance Criteria Control Requirements Fair for Life handling operations	OK	AC	NF	NA
0.1.1	The responsible manager or FT coordinator is present during the audit				
0.1.2	M= The inspector has unrestricted access to all premises, documentation and staff.				
0.1.3	M= The company holds a valid Fair for Life certification contract with the Fair for Life certification body				
0.1.4	M= All handling steps of the certified products under the ownership of the operation are known i.e. all operational sites have been announced, all warehousing or subcontracted processing activities are known, etc. If not, has any certified production taken place in unannounced units?				
0.1.5	The operation is aware of Fair for Life certification requirements and has a basic understanding of its performance against the standard.				

OK= requirement fulfilled; AC= acceptable with conditions; NF= not fulfilled; NA= not applicable; M= minimum requirement;

Every Fair for Life handling operation has to ensure full traceability of Fair for Life products from purchase to sales and must demonstrate that any labelled product complies with the control and labelling requirements of this module. Detailed criteria and the related control points are included in the handler certification Module 4, chapter 4.1.3.

1.1.3.2 Fair Trade Buyers and Conveyors

- c) Fair Trade buyers who buy Fair for Life certified products from Fair Trade certified producer operations and pay the Fair Trade Development Premium and Fair Trade Price must undergo Fair for Life handler certification. (Module 4), See section (d) for possible exceptions in case producer labels the final consumer product.

The Fair Trade buyer is the handler who pays the Fair Trade producer operation the Fair for Life Fair Trade Price and the Fair Trade Development Premium and who markets the product as Fair for Life certified into commodity trade chains (or to consumers – if the same company is buying the products and selling them to consumers as “brandholder”). The Fair Trade buyer commits to long term and fair trade relations with the Fair Trade producer and acts as the Fair Trade trade partner of the producer operation.

The Fair Trade buyer is often the importer in the consumer country, but it may also be a manufacturer or exporter in the production country who buys the product from the Fair Trade producer operation, negotiates the Fair Trade Prices, pays the Fair Trade Development Premium and fulfil all duties of a Fair Trade buyer (see Module 4, section 4.2 for specific requirements for Fair Trade buyers). Fair for Life Fair trade buyers may also buy in products certified under other Fair Trade certification programmes (see Annex 2).

In some products, producer operations can sell in some cases directly to the retailer and negotiate prices and premiums with them and in this case the sourcing part of the retailer's business would need to become Fair for Life certified as first buyer. E.g. In case of fresh fruit, the fruit producer sometimes remains in ownership of the produce until final sales to consumers and receives a price & premium accordingly. If there is an intermediary trader (often importer) who negotiates the prices with retailers and sets the prices to producers, then this trader shall be certified as FFL handler, but in case producers negotiate directly with retailers and sell directly, the retailer needs to become FFL certified handler, if the fruit are to be labelled as Fair for Life certified.

Sometimes, there is an intermediary trader between the Fair Trade producer and the Fair Trade buyer which can either act as intermediary buyer from the producer (conveyor) or as contracted exporter or importer.

Conveyors are in charge of conveying the Fair Trade Price and the Fair Trade Development Premium to the producer. Unlike the Fair Trade buyer, the conveyor does not set prices or pay Premiums for all purchases from the Fair Trade producer, he mainly acts as intermediate trader who buys Fair Trade products according to the quantities and prices agreed with the Fair Trade buyer. The conveyor may sometimes take over some responsibilities from the primary FT buyer, e.g. quality development support, as agreed with the primary buyer.

Normally for conveyors, an annual Fair for Life handler certification (Module 4) is necessary, including the section on buying from Fair Trade producers. In very simple cases where the final Fair Trade buyer can demonstrate implementation of all buyer obligations and with a pricing system that can be well overseen by the certified Fair Trade buyer, registration of the conveyor may be sufficient. The conveyor's clients, the final Fair Trade buyers (Price and Premium payers), still need to be inspected as Fair Trade Buyers.

Contracted exporters or importers are considered like other contracted operators and must be registered as a minimum requirement; see section 1.1.3.4 on intermediary and contracted handlers.

In exceptional cases the certification body may decide on a desk-based (remote) audit instead of a physical visit of very small Fair for Life Fair Trade buyers. In these cases, the Fair Trade buying practices of such buyers will be investigated in detail during the respective Fair for Life producer audit.

- d) Fair for Life certified producers can request that their direct buyers of final consumer packaged products are exempted if all of the following conditions are met:
- The Fair for Life certified producer operation produces and labels the final consumer product, which is labelled in its own brand or at least with prominent information about the Fair for Life certified operation who produced the product. The Fair for Life seal is only used in visual context to the FFL certified producer operation.
 - The Fair for Life certified operation includes a defined Fair Trade premium in its sales price to the buyer (for all products that are labelled as Fair for Life certified), and administers the premium separately, as any other premium received from fair trade buyers
 - The FFL producer operation and the buyer of its ready packaged certified products have a collaboration agreement on long-term (at least perspective of several years, not once-off) collaboration, agreed fair prices (incl. floor price), support for the producer operation, preferential terms of trade. These fair trading principles are cross-checked during the FFL supplier audit.
 - If the buyer is also indicated on the product label, the same restrictions as described in 1.1.3.3 (f) apply with regard to product advertisement and the buyer need to be registered (see section 1.1.3.4)

1.1.3.3 Fair for Life Brand Holders

- e) Fair for Life brand holders under whose brand / company the final product is marketed as Fair for Life certified to consumers, must undergo Fair for Life handling certification (Module 4), unless they are exempted by criteria f) or in case of retail private brand as described in section e).

Fair for Life certified brand holder companies may buy products certified under different approved fair trade certification schemes and market them as Fair for Life Fair Trade certified.

If the brand holder is also the first buyer from producer operations, the above exemptions e) and f) do not apply, as first buyers have to become certified Fair for Life handlers to verify the fair trade practices towards producers, see 1.1.3.2.

- f) Retailers who market Fair for Life products under their own private brand do not need to undergo brandholder certification if all of the following conditions are met:

- The products are processed and packaged by a Fair for Life certified handling company which has responsibility for the fair raw material sourcing (including price paid to suppliers), product composition and labels the products in the name of the retail brand
- The private label product line is included in the handlers Fair for Life certification
- The product label refers to the certified handler of the product with reference to its Fair for Life certification, e.g. "Produced for RETAILER XXX by a Fair for Life certified manufacturer in COUNTRY XX" *The indication can also use the term "Packaged by a Fair for Life certified handler in COUNTRY XX". In case of e.g. fresh fruit, the certified handler shall be referenced (not the primary producer), as the first buyer from the Fair for Life producer operation must always undergo Fair for Life handler certification. The sentence may be adapted to reflect the Fair for Life handler's role.*
- The Fair for Life handler coordinates advertisement campaigns and other PR activities regarding the certified products with the retailer(s) and ensures that the Fair for Life seal is only be used in clear, unmistakable relation to the certified product and that in no way the impression should be given that the retail company and/or its other private brand products are Fair for Life certified. This is then verified during the annual Fair for Life audit of the handling operation.

- g) Small brand holders or those with only a very limited Fair for Life assortment may be exempt from the obligation to undergo handler certification, and become registered as intermediate handlers instead (see section 1.1.3.4) if they meet at least one of the following 3 conditions.

- *Brand holders with a small assortment of products sourced from one single Fair for Life certified supply chain may be exempted from handler certification if these products do not account for more than 5% of the brand holder's total production (in volume) or turnover (in monetary terms). Brand holders who purchase products certified according to other fair trade certification schemes to be marketed as Fair for Life certified or who market Fair for Life products from several Fair for Life supply chains, cannot be exempted under this clause.*
- *Brand holders that are small companies with a maximum of three full time employees can be exempted from being certified. They can similarly be exempted if the Fair for Life audit and certification costs are higher than 2% of their annual turnover.*
- *Brand holders of full Fair for Life production chains: If the entire production chain (i.e. all producers, processors etc. and the FT buyer) is controlled and certified according to the Fair for Life Programme, then subsidiaries or sister brand companies acting as final consumer brand company can be exempted from the control requirements.*

Small brand holders or brand holders / retailers with very small FFL assortment as detailed above can be audited and certified upon their own request.

The application of the above exemption rules as well as additional exemptions are exclusively decided by the Fair for Life CB.

- h) Once Fair for Life products are packed in their final consumer packaging in the name of a certified Fair for Life brand holder company, no further control requirements apply.

It is expected that through application of the chain of custody requirements, Fair for Life keeps an overview on the product flow of Fair for Life certified products into different consumer markets. When a Fair for Life certification chain is very short, e.g. the producer company and its associated processors also act as Fair Trade buyers and brand holders of the final consumer packaged product, the CB reserves the right to require registration of the main distributors of the products in different markets and to be able to spot-check traceability and fair handling requirements of Fair for Life certified products.

1.1.3.4 Intermediate Handlers and Contracted Processors

- i) For labelling of the final product as Fair for Life certified, any intermediate handlers of Fair for Life certified products must be registered as authorised handlers of Fair for Life products or become certified as Fair for Life handler.

The intermediate handler is any trading or processing company who purchases Fair for Life certified products from Fair for Life certified handlers (not directly from Fair Trade producers' operations) and who sells not yet consumer labelled products to other traders as Fair for Life certified. Any company who labels and markets a Fair for Life final consumer product is considered a Fair for Life brand holder (see requirements in 1.1.3.3)). Retail of ready packed Fair for Life products is not subject of control under the Fair for Life programme

If a company purchases not only Fair for Life certified products, but also products certified according to other fair trade schemes which the company wished to be market as Fair for Life certified, it must undergo Fair for Life handling certification.

Although intermediate traders do not have to become certified to label wholesale products as Fair for Life certified to Fair for Life handlers, any trader who buys Fair Trade products may chose to apply for Fair for Life handler certification to sell products (also from equivalent fair trade origins) as Fair for Life Fair Trade certified and to use the Fair for Life seal.

- j) Registered intermediate handlers are neither audited nor certified, but they must ensure traceability and demonstrate decent working conditions according to the requirements defined in Module 4 Fair for Life Handling Operations, Part II.

A registration fee applies. Depending on the type of proof submitted and the risk categorisation of the operation, the Fair for Life certification body may require spot-checks for decent working conditions. Registered intermediate handlers may buy and sell Fair for Life certified products into trade chains, but may not use the Fair for Life seal nor make any claims about their Fair for Life certification.

- k) Processors contracted by Fair for Life certified operations or registered handlers, must also become registered with the certification body and demonstrate compliance with the requirements defined in Module 4 Fair for Life Handling Operations Part II.

Contract processing (or contract handling) means that the product is owned by the contracting Fair for Life certified/registered operation during processing and that the contracted processor only charges for the processing service provided. If a processor buys the products on behalf of the Fair for Life handler (or producer operation) and sells them to the Fair for Life handler the processor would be considered as any other handler of Fair for Life products i.e. they would need to become registered if they are intermediate handlers, or certified if buying directly from producer operations. .

Contracted processors and traders must demonstrate compliance with the same criteria as intermediate traders, but there are additional options for how the contracting company can take over part of this obligation (Module 4, chapter 4.4).

1.1.4 Use of Certification Seals and Other References to Certification

Principle 1.1.4 Use of the Fair for Life seal and references to Fair for Life Fair Trade certification is restricted.

- a) Use of the certification “Fair for Life” seal is optional. The seal may only be used on Fair for Life certified products and on certified products “made with Fair for Life certified ingredients”. It may only be applied to the product by Fair for Life certified producer operations and Fair for Life certified handlers, as well as exempt registered brand holders who have been granted written permission to label their products as Fair for Life certified (see chapter 1.1.3.3).
- b) Intermediate traders who have registered with the Fair for Life certification body as an authorized processor / trader of Fair for Life certified products may indicate “Fair for Life certified product” on invoices and on transport packaging to their buyers. Registered traders may NOT use the Fair for Life seal or make reference to Fair for Life certification for their operation.
- c) Only certified Fair for Life operations are permitted to make reference to their “Fair for Life - Social & Fair Trade certified by <CB>” certification (see criterion d) and use the certification seal in PR material such as brochures, company information, website, etc. The Fair for Life control body may permit use of the seal in other publications in individual cases.
- d) The following references to Fair for Life - Social & Fair Trade certification, may be used in PR materials and information texts about certified operations or products:
 - *Fair for Life Fair Trade certified (with or without the added indication „by <CB>“)*
 - *Fair for Life - Social & Fair Trade certified (with or without the added indication „by IMO“)*
 - *Social & Fair Trade certified by IMO*
 - *certified according to the Fair for Life Social & Fair Trade programme.*
 - *“Fair Trade certified”, only in combination with the Fair for Life seal or text indication of the Fair for Life Certification Programme and certification body.*

For details on product labelling, please see section 1.1.1
- e) The certification seal “Fair for Life” may be applied as displayed here according to separate labelling guidelines. **The seal may also be used in black & white (black font on white background or white font on black background) or in either black or white on a background of any colour. .**



The seal is available with text boxes in several languages.

- f) Any use of the seal and reference to Fair for Life certification on product labels, must be approved by IMO prior to printing. **Statements about Fair for life certification to be used in product advertisements or promotions shall also be approved by the <CB>.**
- g) Any operation certified use the CB’s corporate logo as per CB’s guidelines
- h) Any operation certified according to the For Life Social Responsibility criteria (Module 2, sections 2.1 to 2.5), i.e. all Fair for Life producers and all Fair for Life certified handlers who are also For Life-Social Responsibility certified by IMO, have the optional right to apply the For Life – Social Responsibility seal to any of their products that fulfil the labelling requirements, see section 1.2

1.2 FOR LIFE - SOCIAL RESPONSIBILITY CERTIFICATION

1.2.1 Introduction to Social Responsibility Certification

For Life –Social Responsibility certification by IMO is applicable to the entire range of operations under the scope of the Fair for Life programme. It is suitable for companies world-wide that wish to demonstrate their fair labour practices and good working conditions to clients and other stakeholders.

It may be used as a product certification scheme or as a company certification for business to business communication of Social Responsibility towards its workers and the society. If the raw materials used are from certified social origin, the product may be labelled as For Life - Social Responsibility certified.

Social Responsibility certification does not only set clear minimum requirements for certification, but also assesses the operation’s overall performance beyond minimum compliance. As such it is also suitable for producers and manufacturers in regions with relatively good labour practices already in place.

Companies in countries with a reputation of poor labour standards can use the certification to demonstrate to clients their good working conditions, fair labour practices and commitment to social development in their communities.

Companies have the choice to apply for either:

- Certification as a company (no certification of products). In this case there are no requirements regarding raw materials or certification of suppliers or trade partners.
- Certification of production as well as for products, which allows labelling of products with reference to For Life - Social Responsibility certification by IMO and use of the “For Life” seal, see requirements in chapter 1.2.2.

1.2.2 Labelling of For Life Products

Principle 1.2.2 Products labelled as For Life- Social Responsibility certified, are made from Social Responsibility certified ingredients, are traceable and are handled in a responsible way.

- a) Only products certified according to the For Life certification requirements and listed on the For Life certificate may be labelled as For Life certified. All consumer package product labels must be submitted to IMO for approval before printing.

If the product is to be labelled as “For Life- Social Responsibility certified by IMO” (with or without the logo “For Life”), the following conditions must be met:

A Labelling Requirements for For Life – Social Responsibility Certified Products	
Origin of Raw Material	<p>a) In a For Life certified product, the ingredients are For Life certified or from other certified Social Responsibility production (see Annex 2).</p> <p><i>See Annexes 3 - 5 to this module for detailed minimum content composition and specific labelling rules of different product types (e.g. food products, cosmetics, textiles).</i></p>
Processing and Handling	<p>b) Only a For Life certified producer/manufacturer or For Life certified handler may label the products as For Life certified and use the For Life seal. Brand holders who apply the For Life label to consumer products must therefore become For Life – Social Responsibility certified.</p> <p><i>In specific cases it may be agreed to waive the certification obligation for For Life brand holders if they do not manufacture the products themselves as long as the manufacturer producing the final product is For Life certified,</i></p> <p><i>The For Life handler labelling the product as For Life certified must submit proof that the For Life certified ingredients (or ingredients certified under other social Responsibility certification schemes) are traceable from the Social Responsibility certified producer and that any intermediate handler has ensured traceability and separation of the product.</i></p> <p><i>In case of buying in composite food ingredients, the SR certified content must be known, as this is relevant for assessing the final products’ composition requirements</i></p> <p>c) Any trader who buys in products or ingredients certified under other social</p>

	responsibility schemes and wishes to market the resulting products as For Life certified to other traders, must become a For Life certified company or a Fair for Life registered trader (as defined in Module 4, section 4.4.) or a Fair for Life certified handler (if they also handle fair trade products).
Traceability	d) Social Responsibility certified ingredients are traceable and kept separate from non-Social Responsibility certified products. <i>IMO accepts a maximum of 5% commingling where processing technology does not allow for 100% separation during processing without substantial loss of products (continuous processing lines). See Annex 6 for extraordinary exceptions</i>
Product Labelling	e) On For Life certified products, use of the For Life certification seal is permitted on the principal display panel and anywhere on packaging. Use of the seal is optional. Other truthful references to For Life Social Responsibility certification are permitted as text anywhere on the product label, including the term “Ethical Production certified by IMO”.

For products which contain a substantial amount of Social Responsibility certified ingredients but which do not meet the minimum labelling rules for For Life certified products, the labelling category “Products made with Social Responsibility certified ingredients” applies.

B Labelling Requirements for Products Made With For Life – Social Responsibility Certified Products	
Origin of Raw Material	f) Products made with Social Responsibility certified ingredients contain a substantial percentage of For Life certified ingredients or of ingredients from other certified social responsibility origin (see Annex 2), but the minimum requirements for labelling the actual product as a For Life certified product are not met. <i>See Annexes 3-5 to this document for detailed minimum content composition rules for different product types (e.g. food products, cosmetics, textiles).</i>
Processing and Handling	See criteria b) and c)
Traceability	See criterion d)
Product Labelling	g) On products made with For Life certified ingredients, the use of the For Life certification seal is NOT permitted on the principal display panel (front label). A small version of the seal may be used on the back label. h) On products made with For Life ingredients, references to For Life certification are restricted: <ul style="list-style-type: none"> • <i>On the principal display panel, references may be made to the For Life Social Responsibility certified origin of selected ingredients in the form of the words “made with Social Responsibility certified [...]” or “made with ethically produced [...]”. Other wording may be approved.</i> • <i>The indications must appear in a colour, size and style of lettering which is not more prominent than the sales description text of the product.</i> • <i>The company may also indicate other truthful information, e.g. “made in a company that is Social Responsibility certified”.</i> • <i>The information anywhere on the label or in advertising must state clearly that the product contains For Life Social Responsibility certified ingredients. It is not permitted to refer to the entire product as being “Social Responsibility certified”</i>

There is also the option to only indicate For Life - Social Responsibility quality in the ingredients list of a product.

Rules for Reference to For Life Ingredients in Ingredients List Only	
Origin of Raw Material	i) Some ingredients are For Life Social Responsibility certified but the labelling requirements for product labelling are not met.
Processing and	j) The company indicating on the final consumer packaging the reference to the For

Handling	<p>Life certified origin of an ingredient must register with the CB and must submit proof that the ingredient used originates from For Life certified origin.</p> <p><i>The same exceptions apply as indicated in section 1.1.1.</i></p>
Traceability	<p>k) The registered handler of the product labelled as containing some For Life certified ingredients must demonstrate traceability of the certified ingredients down to the For Life certified producer operation.</p>
Use of Label and References to Certification	<p>l) Reference on labels is strongly restricted:</p> <ul style="list-style-type: none"> • Only permitted on back label, directly under the ingredient statement. The For Life ingredients must be asterisked with a "*" and the indication "'For Life Social Responsibility certified ingredient" • The indication must appear in a colour, size and style of lettering which is not more prominent than the rest of the ingredient list; in this indication the words "For Life" or "Social Responsibility certified" shall not be more prominent than the rest of the statement. • No reference to For Life certification permitted in general advertising or product information text.

1.2.2.1 Control Requirements for Production and Trade Actors

The following table summarises the control requirements of different (potential) actors in the production and trade chain of a product:

Type of Operation	2.1 – 2.5 Social Responsibility Hired Labour	3.1 – 3.5 Social Responsibility Producer Groups	Remarks	Certification Procedures „ For Life“ – Social Responsibility
Plantation, Estate, Farm	X			Full annual audit and certification of each unit (e.g. plantation and factory)
Smallholder Group or Contract Production		X		Full annual audit and certification of group operation
Group of medium-size farms		X	Big farms must be certified according to hired labour requirements	Full annual audit and certification of group operation
Contracted processor in production country				Registration as contracted processor. Must demonstrate traceability and decent working conditions – see Module 4, part II
Producer Group processing activities small scale		X	Working conditions included in Module 3	Included in group operation audit and certification according to Module 3
Producer Group processing activities large scale	X		See details in Module 3 for the scale required for full hired labour certification	Full hired labour audit and certification in addition to audit and certification of group activities
Intermediate traders or processors			Optional full own Social Responsibility certification (hired labour requirements, Module 2)	Registration with the CB and regular update on trade activities. Exceptions possible. Traceability must be ensured.

Brand holder Company labelling the consumer products as For Life	X			Full annual Social Responsibility audit and certification (some exceptions)
Trade with consumer packaged certified products				No registration or certification requirements.

1.2.2.2 Use of Seals and References to Certification

- a) Use of the “For Life - Social Responsibility” seal is optional. On products, the seal may only be used if the products themselves are Social Responsibility certified.
- b) It may only be applied by companies who are Social Responsibility certified by the Fair for Life certification body (CB) as well as registered brand holders who are approved for consumer product labelling. **The CB may permit use of the seal in other publications in individual cases.**
- c) Other registered traders may indicate non-consumer packed goods as being For Life certified, but the use of the seal is not permitted.
- d) If only a company but not its products are Social Responsibility certified, use of the certification seal is restricted to the company’s PR material, brochures, etc.
- e) The following references to For Life Social Responsibility certification may be used:
 - For Life - Social Responsibility certified (with or without the added indication “by <CB>”)
 - Social Responsibility certified by <CB>
 - certified according to the For Life Social Responsibility programme
 - Ethical Production certified by <CB>
- f) The Social Responsibility seal “For Life”, as displayed here, may be applied according to separate labelling guidelines. It may be used in black and white (**black font on white background or white font on black background**) or in either black or white on a background of any colour. All use of the seal and other public references to For Life certification must be approved by the Certification Body prior to printing.



+ 3 new logo versions with text box “Ethical Production certified by <CB>” and “Grown with Social Responsibility” and “Produced with Social Responsibility”.
Seal will be available with text boxes in several languages.

- g) Additionally, the CB’s corporate logo may be used by all operators certified by the CB, as per guidelines.

1.3 CONTROL AND CERTIFICATION PROCEDURES

1.3.1 Basics

The Bio-Foundation approves certification bodies to certify according to the Fair for Life programme. At present, Fair for Life / For Life certification can only be granted by the Institute for Marketecology (IMO), but changes may be published on the Bio Foundation website.

The Fair for Life certification body is abbreviated as “CB” in this section.

1.3.1.1 Quality Assurance

The CB ensures that a complete in-house quality assurance system, according to the norms of EN 45011 / ISO 65, is in place. This includes standard procedures for all important aspects of activities (incl. data handling and filing) and quality management of personnel.

The CB has to ensure that all personnel involved in audits, evaluations or certification decisions has received appropriate training in the applicable standard requirements as well as social auditing techniques and has received all related procedures and quality manual documents.

The CB takes all appropriate measures to prevent conflicts of interests. Any potential conflicts of interest of auditors and certification staff are kept on file in a staff database. Any relevant restrictions resulting from the declared and identified conflict of interest are outlined and considered in work assignments.

Performance of staff and their impartiality (freedom of conflicts of interest) is regularly monitored in order to promptly recognise any shortcoming and improve performance continuously. The CB may invite external experts or qualified bodies to review and scrutinise its certification decisions and procedures (subject to confidentiality agreements).

Auditors and certification officers are acting on duty for the certification body and no verbal abuse or offense can be tolerated. In case of problems, the auditor must report to the certification body for mediation or mitigation wherever possible. In severe cases an audit may need to be discontinued. Complaints against auditors performance can be raised to the certification body, see 1.3.7

1.3.1.2 No Discrimination

The CB will accept all production and handling applications that fall into the scope of the Fair for Life Social & Fair Trade Certification Programme and certify all qualified applicants to the extent of its administrative capacity. However, the CB reserves the right to refuse applicants or certification when there is reasonable suspicion that it may be misused to cover up un-fair and / or un-social practices.

1.3.1.3 Data Security and Confidentiality

In order to safeguard its objectivity and independence, the CB maintains a secure data handling system.

All CB personnel, including those who render services on a freelance basis, have signed an agreement to keep all private information gained in the course of the audit and certification procedures, strictly confidential. Such information may only be passed on to named third parties on the specific request of the operator. Certain data may, however, have to be disclosed to the accreditation agency, which in turn are strictly bound to confidentiality.

Operations certified under the Fair for Life programme agree that their performance rating will be published on the www.fairforlife.org website. The operator will be sent the information to be published for approval before publication (in the Summary Assessment) and any disagreements are settled by applying the appeals procedure described in section 1.3.7. Operations which have cancelled the certification contract, are suspended or de-certified will remain in the online register for at least 1 year with indication of their certification status, but without detailed rating.

The following information is considered public information and may be disclosed by CB in publications or on request: A list of all certified operations including their name and address and certified products / activities. In the course of dealing with a complaint or public allegations, the CB reserves the right to publish a public statement outlining the applied procedures and certification decision.

If in the course of staff interviews confidential information is revealed, anonymity will be strictly granted in order to protect the informant from possible negative impact or punishment. **The case of employees / workers raising concerns to the CB about their employer's compliance with Fair for Life Standards outside the regular audit process is dealt with as alleged violation against the social and fair trade standards, see procedures in the CB's Fair for Life Complaint, Appeals and Allegation Procedure.**

As a principle, the CB does not engage in consultancy of certified operations or product development. The CB and its personnel are bound to remain strictly unbiased and brand neutral and will not engage in trading activities of any kind. Any personal engagement that could lead to conflicts of interest has to be declared to the CB and will be duly considered when assigning the person to a particular job.

1.3.1.4 Costs and Services

All expenses necessary to conduct the audits, evaluations and certification are charged to the client **as indicated in the annual offer. In case of additional services requested by the client during the year (e.g. approval of labels and new products, requests for specific information) and unforeseen complications (e.g. allegation cases), the additional costs will also be charged to the mandator. The CB strives** to minimize the costs and offers combined assignments for different customers where possible. All invoicing is done on the basis of the actual list of fees. Certification may be withheld until full payment of all invoices is received.

1.3.2 Application for Certification

Whenever the CB receives an oral or written request for its services, explanations on the Fair for Life programme are provided to the interested operation and if there is specific interest, further information is submitted depending on the planned scope of certification. The operator demonstrates concrete interest in the CB's services by completing and submitting the Fair for Life application form or all information requested therein.

The interested operator receives the following documents:

- Fair for Life Social & Fair Trade Certification Programme with indication of applicable control modules to download from the www.fairforlife.org website.
- The CB's Social & Fair Trade certification contract.

Based on the screening of the project's application documents and preliminary selection of an auditor, the required time for the audit and certification(s) is estimated. For operations with pre-application eligibility criteria (e.g. all hired labour operations applying for Fair for Life certification, see Module 2 Hired Labour) the respective policies and data are requested as part of the application process. Any further questions on the scope of activities etc. are clarified with the applicant.

The CB screens the application to ensure that the operation may, in principle, qualify for certification or at least for a performance rating. If the application can be accepted, the project will receive an offer ("budget" or "cost estimation") for approval, **which doubles as prepayment invoice if approved. The applicant is informed on the applicable control modules for all operational units included in the certification.** If Social & Fair Trade audits are combined with audits for other schemes, the respective additional audit time and certification costs may be presented in one combined budget. The CB's fee table is available upon request. **As part of the application process, the certification body may also check that the application is in line with its fair washing policy.**

Confirmation of the cost estimate is considered as confirmation of the operator's application. In due course the certification contract for Social & Fair Trade certification is signed, in which the applicant confirms that he will work according to the certification requirements (as per selected scope and level of certification / approval / performance rating) and will grant access to all information needed for evaluation of performance

If the operator has already been certified by another agency according to social or fair trade standards, all certification documents from previous certification agencies are requested and the operator must submit information on possible corrective actions and further explanations had he been refused or if certification was withdrawn before.

After the confirmed application the audit is planned. A project is only certified and thus entitled to market any of its produce as certified after the certification procedures have been successfully finalized.

1.3.3 Preparation of Audit

1.3.3.1 Preparation by the Certification Body

If the application has been approved and the advanced payment has been received, the date of audit is set and the visiting programme defined.

In proposing an auditor, the CB takes into account the auditor's qualification with regard to specific knowledge and experience in social and fair trade auditing, knowledge of the sector, language, gender, national culture, etc. as well as time availability. The auditor will then receive all relevant documents for preparation, include previous certification documents, if any. He / she is bound by the confidentiality agreement signed for all private information gained in the course of this work.

The time of audit will be chosen with regard to specific activity periods (e.g. harvest or processing time) and the availability of the auditor. The duration of the on-site assessment is determined individually for each project, based on basic time requirements for worker or producer interviews (see audit procedure section below), visit of the premises and document review.

The audit date and auditor is announced to the project at least 7 days in advance and the audit schedule agreed. **The operation also receives following information for a due preparation for the audit:**

- list of key personnel to be met by the auditor.
- list of documents to keep ready for the audit
- a workers information note to be displayed in the workplace.

With the notification of the audit date or earlier, the operation will receive the operator profile to complete (update) and **return to the CB within an agreed time frame.**

If audit and certification are required according to multiple standards, the CB will try to combine the audits wherever possible, however, restrictions may arise from audit qualifications. Organic inspections and Social & Fair Trade audits can in most cases be combined in one visit.

1.3.3.2 Preparation by the Operator

In order to perform an efficient and professional audit, the operator is requested to prepare the visit the best way possible. The company shall download and review the applicable modules of the Fair for Life programme and perform a basic self assessment of performance and risks. The operator shall be aware of the applicable requirements of the Fair for Life Certification Programme and shall have taken appropriate measures to ensure, or at least be working towards, compliance. Of course these measures will also be discussed in detail during the audit.

Operators should have a copy of the most important legal labour document on file (e.g. working time regulation, applicable minimum wage regulation).

The company needs to complete the relevant Operator Profile(s) with all relevant data about its employment and/or trade practices and return them to the CB at the latest 1 week before the audit.

The operator has to ensure that also the intended target group of the social and fair trade certification is informed about the certification principles and certification process, e.g. by displaying the social and fair trade policy (or summary thereof) and internal training/information sessions on the company commitment to good working conditions and fair trade, and the workers' right to discuss their working conditions freely with the auditor.

The people in charge (e.g. manager, factory supervisor, etc.) and the concerned staff / members of the operation (e.g. workers representatives, producer representative) shall be informed before the audit in order that they will be available to participate in the audit. If a trade union is active in the certified operation, the union representative should be informed by the company about the upcoming audit.

All staff-related documents need to be ready for checking and necessary transportation (e.g. to producer groups) should be organized. It has to be verified that all received questionnaires (operator profile) are duly completed; open questions can be discussed with the auditor during the visit but extra time due to incomplete profiles will be charged to the client.

All documents concerning the socially relevant activities of the operation (workers contracts, payrolls to staff, staff lists, working hour / attendance sheets, social security records, statutes of organized groups and member lists, health and safety checks and certificates etc.) are to be kept ready for audit.

1.3.4 Audit and Evaluation

1.3.4.1 Frequency of Audits

As a standard procedure, a full announced audit of each certified operation will take place once per calendar year. In certain climatic zones the different inspection seasons may be specially defined.

Additionally, the CB may at any time conduct unannounced spot checks or additional audits.

After at least 3 audits and only in case of long-term excellent performance, Fair for Life certification body may, in due consideration of risks, adapt the audit frequency to a biennial physical audit (every 2 years), with an update desk review in between.

1.3.4.2 Audit Procedures

The overall aim of the audit is to assess the efficacy of the operation's performance with regard to the Fair for Life Social & Fair Trade control points. In the frame of the audit it is checked whether or to what extent the operation meets the certification requirements. Thus, the audit is a cross-check between the operator's description of activities and the reality found in the field / premises.

The audit covers the following steps (as applicable to the type of operation and certification scope)

1. Opening Meeting

- Initial meeting with senior management and managers responsible for key functions,
- In case of Hired Labour audits Worker representatives shall be present; in case of producer group certification producer representatives shall participate¹.
- The auditor confirms the purpose and scope of the audit as well as the audit schedule. S/he also explains the applicable standard requirements and the audit process incl. the principle that normally issues will be communicated to the operator as they arise, in order that s/he will be able to provide additional evidence as necessary or to address issues immediately.
- Discussion of measures taken by the operation to ensure compliance with the applicable standard(s). This part is particularly important for first audits.
- Screening and updating (if necessary) of all basic descriptions (operator profile). In case of producer operations this includes a brief overview of premium received and premium use. *Detailed operational data in profiles should be reviewed in separate management interviews*
- Confirm participation of key informants during the audit (e.g. HR manager, safety manager, etc.) as well as organisation of workers interviews.
- Collection of key documents needed for the audit (e.g. list of workers present during the day)

2. Verification of Employment Practices (Hired Labour audits, Producer Group Audits)

- Site tour of the employment site (including all production, storage and office areas) in order to verify health and safety aspects, physical working conditions, and implementation of procedures. The tour includes canteens and dormitory areas (if any). The site tour also helps to verify traceability and separation of certified products. Special focus:
 - *work environment (space, temperature, tidiness)*
 - *work stations, machine protection and maintenance*
 - *emergency procedures, emergency lighting, emergency exits*

¹ See Module 2, chapter 2.1.2 Freedom of association for guidance on worker representation requirements. If there are no worker representation structure in place, the auditor may suggest random workers to be present and share with fellow workers afterwards. Module 3 outlines requirements for producer representation structures

- *use of personal protective equipment*
 - *first aid provision, presence of trained first aiders*
 - *fire and emergency equipment*
 - *hazardous substances storage, handling and disposal*
 - *waste management*
 - *toilets, sanitation, water*
 - *young workers, indications of discrimination, restriction of workers movements, indication of infringements of workers' dignity, general atmosphere*
 - *selection of individual workers for interviews on the spot, at the production location or closeby, or for subsequent interview sessions*
 - *production records, product labelling & separation measures for certified products.*
 - *communication displayed to workers or information relating to trade unions, workers committee meetings etc.*
 - *canteen hygiene and safety; dormitory conditions, if applicable*
- In case of estates / factories, workers' interviews are a key source of information to confirm / cross check information obtained from the management and to collect information on socially relevant aspects such as discrimination and harassment.

Guideline Worker Interviews	
Companies less than 1000 workers	<p>Minimum number of interviews: Square root of total number of workers.</p> <p>At least one half of the interviews shall be individual interviews (minimum 5), rest may be in small groups</p> <p><i>Each workers category should be sampled i.e. the auditor should strive to interview roughly the square root of number of workers in each category (permanent, temporary, agency). This is particularly important in larger operations.</i></p>
Very large companies > 1000 workers	<p>Minimum number of interviews: square root of permanent workers + square root of temporary workers</p>
<ul style="list-style-type: none"> • <i>Workers shall be selected by the auditor from a variety of departments with a bias on higher risk operational fields or identified weak performance from other verification findings. The selection will consider shift patterns, worker contract types, gender balance, ethnical and other minorities and worker ranks and shall ensure a fair representation of workers.</i> • <i>The interviews shall include a workers' representative if present, at least as part of an interview group. Workers may request that the workers' representative is present during the interview. In case workers are organised in a trade union and the representative has not been interviewed in the course of the audit, the trade union will be contacted and invited to send additional feedback within 2 weeks</i> • <i>Interviews take place in formal (e.g. in meeting room) and informal setting (in the work place) and without any management or supervisory staff being present. Interviews can also be off site and this is especially recommended in case of suspected serious infringements of workers rights.</i> • <i>Interviews and information given therein is confidential. Problems raised by workers are discussed with management in a non-attributable way and the auditor must make sure that any comments they report cannot be traced back to an individual worker</i> • <i>Estimated time per individual workers interview is app. 15 minutes if no serious issues are raised and up to 30 minutes if issues are raised or for group interviews</i> • <i>In countries with data protection requirements, the auditor should use the interview to gain written permission from the worker to review his/her staff files.</i> 	

- Interview with relevant management functions (e.g. HR, production manager, QM manager)
- Review of company policies and procedures (Social & Fair trade policy, Health and Safety policy, fire safety, grievance procedure, employee handbook, recruitment procedures, etc.). Interview with relevant management.
- Review of staff files (contracts, personnel records, training records, disciplinary actions), payrolls and working hour records. Interviews with HR department
- Review of safety related records in particular fire safety reports and fire drill logs, risk assessments, accident injury registers, emergency procedures, H&S committee meeting notes, etc.) and interviews with H&S manager

- A survey of surrounding areas or facilities may provide supplementary information about the employment site and its local context

Specific Case Audit of a Company with several plantations/units

Case A: all units under central management of personnel: in the first year all plantations/units must be visited, then sample at least 60% of plantations under central management; Results summaries in one report

Case B: all separate plantations/units but run by the same company → all plantations/units must be annually audited; Results of up to 4 units may be summarized in a joint Hired Labour audit report, if appropriate.

3. Producer Group Audits

- In case of smallholder groups, a representative sample of producers is visited to verify the actual production situation with regard to social and environmental issues and to confirm / obtain information on group involvement and group management. Interviews with several producers and their workers (if any) are made on their production unit (e.g. farm), to see the actual impact of the Fair for Life Social & Fair Trade programme and the involvement of producers in group activities and decisions. Producer visits also confirm the efficiency of the groups' internal control system with regard to social and environmental aspects
- Minimum number of producers to be interviewed about Social & Fair Trade issues:

Guideline Producer Interviews	
All groups	Square root (number of producers); <i>At least half of interviews should be individual interviews (minimum 5 interviews) with visit of the production site and interviews of casual labour (if any), rest may be in groups.</i>
<p>During the producer visit, the auditor</p> <ul style="list-style-type: none"> • discusses relevant social and trade aspects with the producer and verifies the respective practices, in particular regarding involvement in group decisions, relation to the group operator, price setting and prices paid, training and support received, environmental issues, child labour & discrimination, safe working conditions. • In case of smallholder producers with some casual labour, the majority of producer visits should also include interviews with the producer's workers to verify their working conditions. In case of medium size producers, workers should be interviewed during all producer visits and records of employment verified. The auditor may also interview producers or other people who are not registered in the group for additional reference. 	

- The group operation audit includes an inspection of the Internal Control System (ICS) by screening the ICS records, interviews with ICS manager and internal inspectors/field advisors and may include shadow internal audits.
- All documents related to group organization and management will be checked: list of members, group's terms of references / statutes, member agreements, board members, minutes of general assemblies, prices paid to farmers, farmers' trainings, information on community / social programmes, report on FairTrade Development Premium use (if applicable) etc
- Review of payment to producers, price setting, incl agreed floor price if Fair for Life certified, use of prepayments received.

4. Trading Practices, Product Flow Verification, Fair Trade Premium (all Producers and Handlers)

- Check of purchase records and supplier certificates (from farmers or other suppliers if applicable), processing and sales documentation in order to follow up the product flow.

- Follow up of product lots through the operation to test the traceability system; verification of in-house labelling and sales labels.
- Fair for Life certified Producers: Verification of Fair Trade premium (if applicable): decision process (e.g. committee meetings), agreed projects, incoming premium records, expenditure records, summary reports for trade partners
- Fair for Life certified producers and handlers: Review of communication with trade partners, prompt payment of suppliers invoices, price agreements and trade contracts, promotion of fair trade, etc.

5 Reporting and Evaluation of Findings

- *During the audit the auditor starts to compile the audit report(s) and documentation of findings. The performance for each compliance criterion of the applicable Fair for Life module is rated using the following scale:*
 - (0) – not compliant / very poor performance
 - (1) – not yet sufficient, but already positive developments towards the norm for good social performance
 - (2) – defined as norm for good social performance
 - (3) – voluntary performance higher than norm, exceeding requirements
 - (4) – exceptionally high performance, far beyond minimum performance

M indicates a MUST / MINIMUM requirement for certification

Any not applicable control points are indicated as n.a. and do not count towards the respective totals of applicable Total Norm Points and applicable Maximum (MAX) number of points

- Comments are added whenever the norm (level 2) is not reached or exceeded, or in case the assessment by the auditor requires additional argumentation. In particular any non-conformities shall be described in detail including their severity, evidence found and whether the issue seems of a systemic nature or on-off/isolated.
- At the end of the report, the summary assessment summarizes the points reached. The auditor indicates the list of non-conformities (all Minimum criteria not met, and any criteria rated as 0 and hence needing improvement) and necessary corrective actions. The summary assessment also indicates the list of products to be certified.
- In some cases the report cannot be completed fully during the onsite audit, but in this case the auditor should at least prepare a written summary of findings, and a list of identified non-conformities and corrective actions.

6. Closing Meeting

- Final discussion with the managers to confirm the overall findings of the audit and the rating.
- In critical cases the auditor can decide not to disclose the complete audit report and all findings in detail to the management since it may contain critical information received from workers.
- Key findings necessary improvements to correct fields of non-compliance are discussed **and the list of planned corrective actions updated accordingly**. The operator is informed on additional documents or information to be handed in.
- If ready, the preliminary audit report is signed by the auditor and by the operator to confirm information is correct. **At least, the audited operation receives a written list of non-conformities and proposed corrective actions.**
- **Management shall have a process in place to communicate a summary of the certification outcome to key beneficiaries (workers in case of Hired Labour operations, and producers plus possibly workers in case of producer organisations); as part of the process worker representatives can be invited to the exit meeting.**

7. Follow up and Other Sources of information

- The auditor may also need to evaluate certain aspects in more detail after the audit (national labour right issues, prices, etc.).
- After the visit, the auditor finalizes the audit reports with all necessary data and comments, and updates the operator profile if necessary. Then the final preliminary report is sent to the audited operation with information to send any comments within 1 week. *This step is not necessary, if the operation has already received the complete draft report during the audit.* After this period the auditor submits the report and all related documents to the CB head office.
- In addition to the onsite audit process, the auditor may contact local organizations and officials and conduct interviews with neighbours and third parties to further validate the findings of the audit. For **very big** operations, a formal consultation of local stakeholders by the certification body **may be required** as part of the verification process.

1.3.4.3 Evaluation

The process of evaluation includes the evaluation of performance during and after the audit. The inspector starts his / her evaluation of the operation's performance during the audit and continues after the audit when writing the complete preliminary report of the inspection report. This report is based on the report checklist completed during the audit, and review of any additional documentation collected during or after the audit. Once the inspectors' final report is received in the certification office, the evaluator verifies that all procedures have been performed as required and that documentation is complete and sufficient. Based on all the information in the audit report, the operator profile and other related documents, it is evaluated to what extent the applicant fulfils the certification requirements. Additional CB policies for critical issues (may be country specific) are used as basis for evaluation where applicable. Compliance in each standard issue is evaluated and the rating finalized.

If a control point is not applicable, it does not count in the totals. Based on the number of not applicable (n.a) control points, the applicable total Norm Points and Maximum Points are calculated. For certification, an operation must reach a certain percentage of applicable norm points (e.g. 90% of applicable Total Norm Points in first year of certification) as indicated in each module. The operation must meet all Minimum requirements.

If necessary, conditions and sanctions can be imposed in addition to the measures already agreed on between the auditor and the operator. If the operator fulfils the certification requirements, no corrective measures will be imposed, but certain control point ratings may yet to be confirmed by e.g. additional documentation to be submitted. Also, recommendations may be given to improve the operator's performance.

After finalizing this evaluation, the documents are submitted to the certification officer for the final certification decision.

If certification cannot be granted or in case rating has only been applied for, the evaluator compiles a performance rating report and drafts a confirmation of performance. This confirmation indicates clearly the rating for all selected standard issues, as per request of the client. Additional comments of positive achievements may be added.

1.3.5 Certification

1.3.5.1 Decision on Certification

Certification is the final assessment and approval of the evaluation results with regard to an operation's compliance with the certification requirements. Certification is strictly separate from the audit and is always done by the certification office.

As a guideline for certification, an operator:

- must fulfil all applicable MUST / MINIMUM requirements (either reach 1 or 2 rating, whatever the MUST / MINIMUM level is in respective year) AND
- reach the minimum number of applicable Total Norm Points per chapter (rounded down to next full number). E.g. 90% of applicable TNP in first year of certification. Applicable Total Norm Points is the sum that would be reached if operator fulfils the norm (rating 2) in every control point that applies to the operation.

The minimum points (MIN) serve as guidance for the actual certification decision only. The CB reserves the right to take individual certification decisions based on the overall performance evaluation of the operator. In case of complex or unclear findings the certification officer reverts the final decision to the Fair for Life certification committee.

1.3.5.2 First Certification

Positive Certification Decision

If the activities are found to be in compliance with the Fair for Life Social & Fair Trade Certification Programme (see certification guideline rules above) certification will be granted. There may be certification conditions with indicated deadlines for corrective action and recommendations may be included for the improvement of the operator's performance.

The operator receives a certification notification from the CB, together with the summary assessment and the operation certificate valid for a minimum of one year. Normally, also the complete final audit report will be sent, however the CB reserves the right not to hand out the complete audit report and instead only a summarized version in critical cases (see "Procedures in Case Certification Cannot be Granted" for details, below). The summary assessment contains the rating including a text evaluation of the operations performance, which will be published on the Fair for Life website, unless changes are requested.

Also the operator receives the invoice for the audit according to the current tariff.

Procedures in Case Certification Cannot be Granted

In case the applicant is not able to comply with the minimum requirements, the applicant will receive a notification of non-compliance together with an indication of necessary fields of improvement.

The operator then has to inform the CB of his planned next steps e.g. scheduling a follow-up audit at a time at which compliance can be ensured, or withdrawing the application for certification and choosing to receive only a performance evaluation confirmation and the performance evaluation report. The operator can also submit written proof to rebut the rating.

The CB will then evaluate the situation again and, if possible, issue the certification or else a written notice of denial of certification.

In critical cases, the CB may find it necessary not to reveal the full audit findings to the operator in order to protect e.g. workers who have given sensitive, critical information. In this case, the CB will prepare a justification and summary of findings for the operator in order to allow the operator to react to the non-compliances but without revealing any details that could allow the operator to identify the source of critical information. In this case, the CB will submit, upon the request of the operator, the complete audit report and related evaluation documents to a neutral third party that ensures confidentiality of the information but can crosscheck the CB's audit findings and the resulting rating. **If the operation does not agree, appeals procedures as described in chapter 1.3.7 can be initiated.**

1.3.5.3 Procedures in Case of Re-Certification

Positive Certification Decision

If the actual audit proves that the minimum requirements are still fulfilled, the operator receives an updated certificate, the certification notification, summary assessment and audit report(s).

Procedures in Case Certification Cannot be Granted

If the operation has been certified before and requires continuation of certification, but the minimum certification requirements are no longer fulfilled, the operator is informed in a letter of non-conformity to take appropriate corrective measures. If correction of the non-conformity is not possible or correction of non-conformity is not completed within the prescribed time, the operation will be notified of the withdrawal of certification for a certain time (suspension) or for good (withdrawal). Depending of the severity of the violation, suspension of certification may be with immediate effect.

If the certification is suspended the operator is informed in writing that they are no longer to make any reference to Fair for Life certification on any product labels or PR material and to inform its clients accordingly. The suspension will also be indicated on the Fair for Life website in the operation's rating section. Suspended operations can submit proof of corrected non-compliances and, with or without an additional audit depending on the case, certification can be reinstated. If compliance is not reinstated within a maximum of 12 months, the certification is withdrawn.

In certain cases of minor shortcomings, the CB may rule that the certification is only temporarily suspended, without any effect on marketing activities nor indication on the website, for a maximum of 6 months, within which time correction of non-compliances must be confirmed if certification is to be resumed. In this case the operator may market produce as certified, but may be required to inform all trading partners of the suspension and his plans to restore compliance within 6 months.

If certification has not been granted or had to be withdrawn, the operation can request at any time to take up certification procedures again and hence schedule another audit to confirm that it is once more compliant with the certification requirements and can be granted certification. Depending on the time frame between the first audit and the follow-up and the fields of non-compliance, the CB can decide to focus the **additional audit on selected issues only**. **Certification decisions can be appealed, as described in chapter 1.3.7.**

1.3.6 Continuation of Certification

1.3.6.1 Communication

A certified operator must notify any substantial change in the activities or in the measures taken to ensure compliance with the Fair for Life Social & Fair Trade Certification Programme by submitting an updated version of the operator profile. This includes information on new suppliers or new recipes for processed products, major changes in labour policies, a new processing facility, etc. All these activities need to be approved / audited by the CB prior to considering them part of the certified operation.

For small changes it is sufficient to highlight them in the annual updating of the operator profile before the audit.

The operator is obliged to notify the certification body if ever there is any knowledge or suspicion of any major breach of the agreed Social & Fair Trade criteria, which may jeopardize the continuation of certification. In such case the operator describes the problem and suggests corrective measures. Depending on the severity, the CB will decide whether certification will be suspended for a certain period or must be fully withdrawn until e.g. another audit confirms compliance again.

1.3.6.2 Amendment of Standards

It is the operators' obligation to ensure that the most up-to-date version of the applicable Fair for Life Social & Fair Trade programme is at hand. The programme is available on the Fair for Life website www.fairforlife.org. In order to facilitate the updating, the CB will notify important changes of the requirements **to certified operators and include them in consultations for any standard changes**.

1.3.6.3 Annual Audit and Continuation of Certification

As a standard procedure, each year a full on-site audit of all certified operations is conducted by the CB, but in due consideration of risks and overall performance, the CB may decide to decrease the audit frequency. The findings are evaluated in detail and the operation proposed for certification.

The procedures for these steps are described in the chapter "Audit and Evaluation". Then, certification is granted or withdrawn as described in the chapter "Certification".

The CB reserves the right to conduct additional unannounced audits or additional investigations at any time. Based on the results of these unannounced audits, the certification status of an operator may need to be reviewed and certification may be suspended as a result, as described in the chapter “certification”.

A company is free to cancel the certification contract [in line with the terms indicated in the contract](#).

1.3.6.4 Exceptional Withdrawal of Certification

Certification and the right to make claims of certified Social & Fair Trade production can be withdrawn at once or at a given deadline under any of the following conditions:

- Cancellation of the contract by the operator or the CB
- Refusal of audit
- Refusal of information
- Attempted fraud, bribery or willingly submitted false statement
- Evidence that Fair for Life Social & Fair Trade certification is being misused to cover up unfair and / or unsocial practices
- The operator has not paid the applicable fees to the CB in due time

In all the cases mentioned above the operator will receive a notification and deadlines. In order to be legally valid, cancellation of contracts must be done within the timeframe agreed in the contract. Immediate cancellations of contracts by the CB are always to be approved by the managing board of the CB and are subject to possible appeal. This applies also to decisions for suspension or withdrawal of certification due to outstanding payments.

1.3.7 Complaints, Appeals and Allegation Procedures

Any affected party can present complaints (objections) related to the audit and certification services provided by the Fair for Life certification body (CB) and its evaluation and certification decisions. The certification body aims to ensure effective resolution of such objections.

The Fair for Life complaint, appeal and allegation procedures are based on principles of ISO/PAS 17003:2004, ISO 10002:2004, SA8000 guidance and the best practices as implemented by other social standard certification schemes.

The resolution process to address any objections raised shall be credible, transparent and impartial. The person managing a complaint or appeal will be selected to be competent to assess the situation and unbiased. The CB may invite external experts or stakeholders to review its certification decisions as well as handling of complaints and allegations

The entire process from receipt of the objection to resolution is duly documented. The confidentiality agreement between the certification body and the certified operation shall be respected regarding the disclosure of any detailed data about the operation and audit findings,

All complaints, appeals and allegations are dealt with using an escalation approach, i.e the received objections are handled in gradual steps, case by case, designating the responsible persons and resources according to the severity of each case. As far as possible, cases will be solved already in the initial stages, and they will be escalating further only in case a sound solution cannot be found on a certain stage and if the case is backed up by material evidence/support, See section 1.3.7.4.

Objections are categorized as follows:

- Complaints: Dissatisfaction by the certified operator related to the manner that the certification body provides its services
- Appeals: Disagreement with the certification decision or decision making process by the certified operation.
- Allegations: Complaints or grievances raised against an operator certified by IMO because of alleged violation of the standards, e.g. by workers, trade unions, NGO's, etc.

1.3.7.1 Complaints Handling Procedures

Complaints by the certified operation regarding the CB's services (e.g. control procedures) are dealt with according to the CB's complaint procedure, covering the following steps:

- a) All received complaints are preliminarily reviewed by the responsible manager to ensure that they are not evidently unfounded or crucial information is missing. The CB keeps a central register of complaints.
- b) The responsible complaint manager writes to the complainant to confirm receipt of the complaint and to provide an overview of follow up procedures and time frames.
- c) The complaint is duly investigated in consideration of facts provided, data in project file as well as additional information obtained of the staff members concerned and/or third party experts if relevant. Further information is requested from the complainant if necessary.
- d) Based on the findings, measures are proposed. The measures to be taken are based on the requirements of the case (incl. that they need to be reasonable with regard to necessary efforts/expenses as well as timely clarification of the matter).
- e) Complaints shall be resolved in a timely manner and the complainant shall receive a written answer to the complaint filed.

1.3.7.2 Appeals Handling Procedures

Any operation which has been audited against the Fair for Life programme can appeal the certification decision. The operation is informed about its right to appeal in the IMO certification notification. The following procedures are followed:

- a) Within 14 days of receiving the certification letter, the operator submits a written rebut of the described facts to the control body by submitting new evidence or additional justification.
- b) On this basis the certification body re-evaluates the situation. All revision steps are duly documented.
- c) The result is communicated to the operation in writing, either as revised certification notification or explanatory letter.
- d) If no agreement can be found, the appeal can be taken to the next stage, as described in the escalation process in section 1.3.7.4.

1.3.7.3 Allegations Handling Procedures

Allegations (grievances or "complaints") raised by workers and external stakeholders regarding a certified operation's alleged violation of the Fair for Life Standards shall be handled as follows:

Addressing Workers / Producer Grievances within the Company

- a) The Fair for Life certification body does not act as mediator between management and workers (nor between the group operator and the individual producers). Fair for Life requires all certified operations to implement an efficient "internal grievance procedure", allowing any members of the structure to file their concerns regarding the functioning of the organization and social/fair trade performance without penalization,
- b) Workers / producers are encouraged to raise their grievances to management by means the grievance procedure and/or worker/ producer representation structures. During the IMO audits, the handling of internal grievances is always carefully verified, and audits always include a substantial number of workers / producers interviews.

Information Received From Workers / Producers During The Audit

- c) Workers have the right to discuss all matters of their employment with the Fair for Life auditor during the audit and directly after audits (per email or phone) to notify the certification body of suspected breaches of social and fair trade standards.
- d) All information received is dealt with as a potential non-conformity, thoroughly investigated and cross-verified within the regular audit time. In the case of material allegations, the audit time may need to be increased accordingly, and the cost has to be covered by the operator. The informant's identity is kept strictly anonymous in communication with the certified operation.

Information Received After The Audit

- e) If workers, producers, or external stakeholders with insights into a certified operation's performance, contact IMO at other times about alleged violation of Fair for Life standards, the information provided will be duly considered and followed up by IMO according to a risk based approach.
- f) The allegation is pre-assessed to decide if it should be handled as a minor or a major allegation.
 - Minor allegations (raised only singularly, without substantial information or data and / or directly contradicted by audit findings), will be briefly investigated further and will be considered for the next regular audit. During that audit they will be followed up and cross-verified by means of workers' interviews, site inspections and document reviews as applicable.
 - Major allegations (raised by several stakeholders or workers OR not substantially contradicted by audit findings and concerning minimum certification requirements, objective evidence of violation of the standards) will be always followed up in detail, with all investigations and findings fully documented.
- g) If the allegations are found to be substantial and cannot be verified remotely, an unannounced audit of the certified operation is performed, at the cost of the certified operation. Management of the company is informed of allegations (in general terms that do not give information on identity of informant) and is given the chance to respond.
- h) Based on the findings of the additional audit, the certification decision is reviewed as per standard procedures and certification suspended if necessary.

Information Received in Formal Stakeholder Consultation

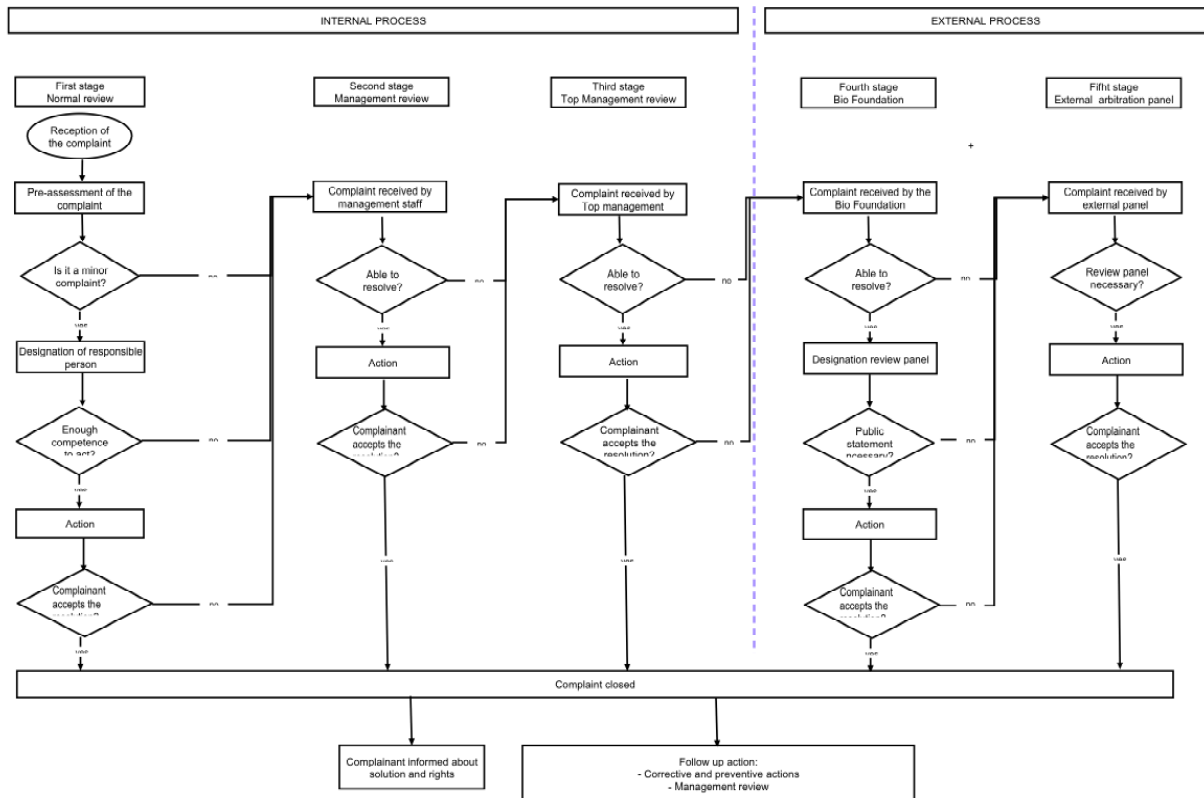
For very large operations (in number of workers, or part of a large corporation) the CB may require a formal stakeholder consultation in preparation of the audit as a standard procedure and will notify the applicant accordingly in course of the application process. Information received about an applicant's or certified operation's performance in this process are then included in overall assessment of the operation's compliance with Fair for Life standards during and after the audit.

1.3.7.4 Stages in dealing with Complaints, Appeals and Allegations

Complaints, appeals and allegations received by IMO will be handled in different stages, following an escalation process methodology outlined according to ISO 10002 principles. The escalation approach implicates that IMO will handle the received objections in gradual steps, case by case, designating the responsible persons and resources according to the severity of each case.

The CB's Quality Manager is in charge of handling complaints and allegations from 2nd Stage onwards and will designate the responsible person for dealing with the complaint according to its nature and severity. If required, external experts may be invited to help in resolution of the complaint or further investigation of the allegation.

After each stage of the escalation process, the CB will contact the complainant for informing him about the outcome of the investigation and review of the complaint. If the complainant accepts the response provided, the procedure will end at that point.



The 5 stages of the Fair for Life escalation process are:

1st stage: Normal review

The person receiving the objection will listen and understand the concern and will attempt to solve it directly, if he / she knows the matter and has the competence for doing it. To do so, he / she might ask for the assistance by a colleague with the required technical knowledge. The responsible person will inform the complainant about the resolution.

2nd stage: Management review:

If the complaint is not solved at the first level, it will be presented to a managing staff. He/she will review the complaint and explore a resolution. He/she will conduct or assign the necessary investigations on the matter. The members of staff involved in the investigated case will be contacted for clarification purposes, but they will not assess the complaint.

3rd Stage –Top Management Review

Where the complainant does not accept the decision of the manager, the manager refers the complaint to the CB's director. The director will conduct a formal review of the steps taken by the staff, from receiving the complaint to the final decision.

4th Stage –Review by the Bio-Foundation

Where the complainant is dissatisfied with the decision of the certification body's director, and if the complaint is supported by material evidence and backed by more than one individual's allegation (e.g. workers plus workers right organisation after due research of the case) he/she can refer the complaint case to the Board of the Swiss Bio-Foundation, which is the standard holder of the Fair for Life programme.

The board will conduct a formal review of the complaint case, and present the case to the Fair for Life Stakeholder Advisory Committee or refer it directly to the next stage..

5th Stage: External arbitration panel

If no agreement can be found by the Bio-Foundation and the complainant, the complainant may invoke arbitration before an external arbitration panel, which will not be a standing body, but will be created at each invocation of arbitration under this system.

The external arbitration panel will be constituted by different persons, according to the matter of the alleged violation of the FFL standard. It is expected that the persons participating in the panel will be reputed experts on the matter, and they shall be unbiased. They will be designated as follows:

1. One representative will be named by the complainant by himself, or by an advocacy organization / NGO representative he/she chooses for this purpose.
2. One representative will be named by the Bio-Foundation.
3. The third member will be chosen by both representatives to serve as a Chair and neutral arbitrator (details and restrictions regarding the selection of the members of the board are stated in separate guidelines).

The panel will decide by majority vote whether the certifying body correctly or incorrectly certified a company as compliant to the standards, and this decision may be made public by the panel. When the panel finds that in fact the certification is not warranted, the certification body will suspend certification, until the operation will be able to demonstrate full compliance with the corresponding Fair for Life criteria.

The cost of the arbitration system will be shared between the advocacy organizations invoking arbitration, the company seeking the FFL certification and the certification body.

Where the Fair for Life standard system is found to be deficient, the related standard issues will be addressed in the course of the next standard revision process.

ANNEXES

Annex 1: List of high and upper middle income countries

Annex 2: List of equivalent certification schemes

Annex 3: Labelling and composition requirements for food products

Annex 4: Labelling and composition requirements for cosmetic and beauty products

Annex 5: Labelling and composition requirements for textiles

Annex 6: Extraordinary short-term exceptions

ANNEX 1: LIST OF HIGH AND UPPER MIDDLE INCOME COUNTRIES

Fair for Life applicants in high income or some applicants in upper middle income countries must demonstrate their eligibility for Fair for Life as part of their application.

Fair for Life refers to the World Bank country rating for this purpose

Upper middle income countries: <http://data.worldbank.org/income-level/UMC>

(Hired Labour Fair for Life certification applications only)

High income countries OECD: <http://data.worldbank.org/income-level/OEC>

High income Countries others: <http://data.worldbank.org/income-level/NOC>

ANNEX 2: LIST OF EQUIVALENT CERTIFICATION SCHEMES

The following certification of suppliers to Fair for Life handlers are accepted as equivalent fair trade certifications. The CB reserves the right to assess the supplier's fair trade audit report before approval as fair trade certified supplier to the Fair for Life operation.

In either case the final product to be labelled as Fair for Life certified will be assessed against the Fair for Life labelling and composition criteria based on the certification status of raw ingredients.

Equivalent Fair Trade Certification Schemes	
FLO certification	Fair for Life accepts producer and trader certification by FLO-Cert as equivalent Fair Trade certification. No mutual recognition.
Soil Association Ethical Trade Programme	Mutual recognition of fair trade certification.
Ecocert Fair Trade standard	Mutual recognition of fair trade certification; some additional restrictions may apply (e.g. organic certification). T.b.c.
FT USA	Fair for Life accepts trader certification by FT USA as equivalent Fair Trade certification for all products originating from producer operations certified under equivalent schemes (e.g. FLO-certified).

Status: 1.4.2013

Equivalence of products certified under other fair trade certification schemes can be assessed, case by case, on behalf of any Fair for Life or For Life certified handling operation (or a trader certified according to another scheme), based on inspection reports and assessment results.

The following certification of suppliers to For Life certified companies are accepted as equivalent. The CB reserves the right to assess the supplier's audit report with regard to social practices before approving the supplier as social responsibility certified supplier to the For Life company

In either case the final product to be labelled as For Life certified will be assessed against the Fair for Life labelling and composition criteria based on the certification status of raw ingredients.

Equivalent Social Responsibility Certification Schemes	
SA8000	Fair for Life accepts SA8000 company certification as equivalent Social Responsibility certification. No mutual recognition.
Rainforest Alliance Sustainable Agriculture	Fair for Life accepts RFA producer certification as equivalent social responsibility certification. No mutual recognition.
UTZ Certified	Fair for Life accepts UTZ Certified producer certification as equivalent Social Responsibility certification if in combination with organic certification or other certification that confirms that products are not genetically modified. No mutual recognition.
FLO certification	Fair for Life accepts FLO producer certification as equivalent. No mutual recognition.
Soil Association Ethical Trade Programme	Mutual Equivalence Agreement.

Status: 01.07.2013

Equivalence of products certified under other Social Responsibility certification schemes can be assessed, case by case, on behalf of any Fair for Life or For Life certified handling operation, based on inspection reports and assessment results.

ANNEX 3: COMPOSITION RULES FOR FOOD PRODUCTS

Product labelling categories and their respective permitted labelling claims, logo use and permitted references to certification on products are defined in Module 1, chapter 1.1.1

The two label categories with composition requirements are Fair for Life products and products made with specified Fair for Life ingredients:

Fair for Life certified products	Product can be labelled as Fair for Life certified Fair Trade product Use of Fair for Life logo permitted on principal display panel (front of pack). Compulsory and permitted Label indications: see 1.1.1
Products made with specified Fair for Life ingredients	Only specified ingredients can be labelled as Fair for Life certified Use of Fair for Life seal restricted to side or back panel; various restrictions of references to fair trade on pack, see 1.1.1

Intent:

Fair for Life composition rules aim to maximise positive impact of fair trade to producers and workers in the supply chains. Companies are expected to analyse the potential Fair Trade impact of the ingredients they use and to select the most meaningful Fair Trade ingredients and strive to achieve as high levels of Fair Trade ingredients as possible, exceeding minimum composition requirements

The following composition requirement recognise, however, that operators may, for a variety of reasons not always be able or intending to source all agricultural ingredients from fair trade certified sources. This applies in particular ingredients that are traditionally considered to be not fair trade certifiable (e.g. diary products) or which are not yet available in fair trade certified quality but could be certified under Fair for Life standards.

Definitions:

Single ingredient products

Products composed of a single type of an ingredient. This may include a blend of several ingredients or cultivars of the same product type (e.g. olive oil) from one or more fair trade suppliers (e.g. a blend of fair trade olive oils) and may include use of processing aids or auxiliaries.

Multi-Ingredient products (Composite products)

Consumer ready food product or food ingredient product composed of more than one type of ingredient

Fair Trade certified quality

Fair for Life fair trade product certification or equivalent fair trade product certification schemes as listed in Annex 2

Available in certified fair trade quality

Availability refers to the product being readily available in the required quality, quantity, technical specification, and provenance from producers certified under the Fair for Life programme or equivalent other fair trade certification schemes.

Annex 3. 1 Composition of Fair for Life Certified Food Products

- a) At least 80% of all agricultural ingredients (in weight, excluding added water) are certified Fair Trade quality.

Companies are expected to analyse the potential Fair Trade impact of the ingredients they use and to select the most meaningful Fair Trade ingredients and strive to achieve as high levels of Fair Trade ingredients as possible.

If ready made composite fair trade certified food ingredients are used in the composition, only their fair trade components count as fair trade certified quantity.

For drinks made from juice concentrates or reconstituted components, the reconstituted quantity (e.g. reconstituted orange juice or coconut milk) is counted for the calculation of fair trade content.

- b) Each type of ingredient in a Fair for Life certified product shall be used only in Fair Trade certified quality.

For example in a Fair Trade chocolate with Fair Trade cocoa and Fair Trade sugar, the entire amount of cocoa used and the entire amount of sugar used shall all be Fair Trade, even if the cocoa is used from 2 different origins for quality reasons.

In a single ingredient products (incl. blends of the same type of ingredient), 100% of the product shall be fair trade certified.

In case blending is required and the respective ingredient not available in fair trade certified quality, an exception is required (see section c)

- c) For a temporary period, until the market for Fair Trade products has sufficiently developed, exceptions to rules (a) and (b) are possible for products containing at least 50% Fair Trade certified agricultural ingredients, subject to the following conditions:

- i) Written application for exception with detailed justification for lower fair trade content or blending of the same ingredient type in non-Fair Trade quality.
- ii) All ingredients that are readily available in certified Fair Trade quality are used in Fair Trade quality
- iii) The company presents a plan to reach the agreed target fair trade level within 3 years, i.e. 80% Fair Trade content and/or each ingredient used only in Fair Trade quality for single-ingredient products.

Depending on product composition, ingredient origins and Fair Trade potential of the ingredients, slightly lower minimum contents and target content levels or longer transition periods may be agreed.

If lower temporary target levels apply generally for certain product categories (e.g. milk chocolate) these will be published in an Exception list on the Fair for Life website.

- iv) Application for exceptions will be reviewed by the Fair for Life certification body and in due consideration of each case granted for a maximum of 3 years, then the company has to re-apply providing new justification.

Application for renewed exception will only be granted to companies that demonstrate efforts to source as many fair trade ingredients as possible in fair trade certified quality and supports fair trade producers and development of new fair trade supply chains.

Annex 3.2 Composition of Products made with Fair Trade Ingredients

- d) At least 20% of all agricultural ingredients (in weight, excluding added water) are certified Fair Trade.
- e) Single-ingredient products containing the same ingredient in fair trade quality (in quantities beyond 20%) and non-fair trade quality may be certified in this category, with additional label restrictions.

In this case the reference to the fair trade ingredient on the principal display panel (front of pack) is not allowed nor as part of the main product description. The label text and position of seal on back or side panels needs to be carefully verified to ensure that the labelling claims are not misleading.

ANNEX 4: COMPOSITION RULES FOR COSMETIC AND BEAUTY PRODUCTS

Note: Rules for product labelling for the different labelling categories are indicated in chapter 1.1.1

Annex 4. 1 Composition of Fair for Life Certified Cosmetic and Beauty Products

A cosmetic / beauty product may be labelled as Fair for Life Fair Trade product if EITHER condition a) OR condition b) is met as well as condition c):

- a) At least 50% of ALL ingredients (per weight, excluding added water) are non-aqueous non-juice Fair Trade certified ingredients (e.g. moisturizing ingredients, cleansing ingredients, essential oils or the dry weight plant fraction in plant gels, fruit juices or plant extracts).

Example 1: A body lotion containing 60% Fair Trade certified coconut oil and shea butter and 40% other ingredients like emulsifiers and ethanol (60% total Fair Trade content).

Example 2: A soap containing 40% Fair Trade soap made from Fair Trade oils and 40% non-Fair Trade Aloe Vera gel and 20% water would be a Fair for Life certified soap (excluding water, 50 % of the contents are Fair Trade certified non-aqueous, non-juice ingredients, in this case saponified oils).

However a soap containing 40% non-Fair Trade soap and 40% Fair Trade Aloe Vera and 20% water would not qualify as Fair for Life Fair Trade certified soap. Excluding water, the non-aqueous ingredients – the saponified oils- are not Fair Trade certified. Of the Aloe Vera only the non-water (dry weight) content counts as Fair Trade certified with the total non-aqueous Fair Trade content hence being much below 50%. This soap could, however, be labelled as “Soap made with Fair for Life Fair Trade Aloe Vera”.

- b) 90% of ALL ingredients (per weight excluding added water) are Fair Trade certified ingredients.

This option is mainly relevant for products made from aqueous Fair Trade ingredients, e.g. Fair Trade certified Aloe Vera gel for cosmetic purposes, hair rinse based on Fair Trade fruit juices, etc. In this case the entire amount of Fair Trade certified fruit juices and fruit gels counts as Fair Trade content (even if reconstituted to natural concentrations). However, in watery herbal infusions, only the plant fraction counts.

- c) In either case the Fair Trade certified content shall always be higher than 10% of the entire formulation including water.

Companies are expected to analyze the potential Fair Trade impact of the ingredients they use and to select the most meaningful Fair Trade ingredients and strive to achieve as high levels of Fair Trade ingredients as possible.

Annex 4. 2 Composition of Cosmetic and Beauty Products made with specified Fair for Life Ingredients

- m) At least 15% of ALL ingredients (in weight) excluding added water are certified Fair for Life Fair Trade quality.

- n) The total Fair Trade certified content including water shall always be higher than 5%.

In plant infusions and liquid extracts, only the plant fraction counts as Fair Trade certified weight.

ANNEX 5: LABELLING RULES FOR TEXTILES AND OTHER INDUSTRIAL OR ARTISANAL PRODUCTS

This section refers to labelling of products other than food or cosmetic products which may be made of materials from Fair for Life certified primary production, e.g. textiles, toys made from natural materials, jewellery made from Fair for Life certified gold or diamonds, etc.

Labelling of Textiles and Other Industrial or Artisanal Fair for Life Certified Products	
Origin of Raw Material	<p>a) The principal constituent of the product is from certified Fair Trade natural origin, e.g. the cotton fibre in jeans or the wool in Fair for Life certified knitwear.</p> <p><i>As a basic guideline it is expected that the Social & Fair Trade component(s) of the final product constitutes at least 80% of the total weight, for a temporary period however, a product can be certified as Fair for Life Fair Trade if at least 50% of components are Fair Trade quality according to the procedures and requirements to grant exceptions as described in Annex 6:</i></p> <p><i>For artisanal products, guidance on sourcing of raw materials is included in Module 5. The same requirements (Module 5, section 5.2) can also be used to assess artisanal products made in Fair for Life Hired Labour artisan enterprises</i></p> <p>Each product composition will be assessed individually and the permitted labelling status determined.</p>
Processing and Handling	<p>b) The most labour intense processing step must normally undergo full Fair for Life Social & Fair Trade producer certification according to the hired labour standards (Module 2) with Fair Trade pricing and Fair Trade Development Premium for workers, e.g. the sewing mill / Cut Make Trim unit in case of garment production.</p> <p><i>Based on the assessment of each chain of custody and on the specific product, this obligation may be waived, if the main Fair Trade focus and risk of labour right violation is in the primary production rather than in subsequent processing steps.</i></p> <p>c) Otherwise the same chain of custody requirements apply as for other Fair for Life certified products – see chapter 1.1.3:</p> <p><i>Fair Trade buyers from Fair Trade producers as well as final brand holders shall normally become Fair for Life certified handling operations (exceptions see chapter 1.1.3). Any intermediate traders and processors must be registered and demonstrate compliance with the requirements for intermediate traders (Module 4, part II) which include traceability and proof of decent working conditions.</i></p> <p><i>Based on a risk assessment along the chain of custody, the CB may decide to require full Social Responsibility certification of intermediate operations with high risk of labour right violations. Otherwise, adapted labelling such as “made with certified Fair Trade cotton” or similar may be possible.</i></p>

Labelling of Textiles and Other Industrial or Artisanal Products Made With Fair for Life Components	
Origin of Raw Material	<p>a) A substantial constituent of the product is from certified Fair Trade origin, e.g. the cotton fibre in mixed fibre T-shirts.</p> <p><i>As a basic guideline it is expected that the Fair Trade component(s) of the final product constitutes at least 20% of the total weight,</i></p>
Processing and Handling	<p>b) In this case only the Fair Trade buyer from producer as well as final brand holder must become Fair for Life certified handling operations. Any intermediate traders and processors must be registered and demonstrate compliance with the requirements for intermediate traders (Module 4, Part II)</p>

ANNEX 6 EXTRA-ORDINARY SHORT-TERM EXCEPTIONS

Annex 6.1 Disruptions in Fair Trade Supply Chains

In case of extraordinary disruptions in established fair trade supply chains due to serious political unrests, climatic disasters like hurricanes, tsunamis, hail storms or crop failure well beyond regular harvest fluctuations, the Fair for Life handler can apply for a short term extra-ordinary exception to use non-fair trade ingredients for a limited period without short term effect on product labels. This is subject to the following conditions:

- i. The regular fair trade supplier confirms unavailability of fair trade certified supplies and the reason for the shortfall in writing.
- ii. In a written application for extra-ordinary exemption, the Fair for Life handler can demonstrate efforts to find alternative fair trade certified suppliers of the product.
- iii. If no fair trade certified suppliers can be found, suppliers with proven good production practices are chosen (e.g. organic, UTZ Certified, etc.)
- iv. In case of short term other non-fair trade “emergency” suppliers, the handler shall operate a fair trade premium compensation scheme and continue to pay the respective fair trade premium into the regular fair trade supplier’s premium account.

Depending on product composition, ingredient origins and Fair Trade potential of the ingredients, slightly lower minimum contents and target content levels or longer transition periods may be agreed.

If lower temporary target levels apply generally for certain product categories (e.g. milk chocolate), these will be published in an exception list on the Fair for Life website.

Annex 6.2 Exceptions Physical Traceability

Fair for Life requires physical traceability and separation of fair trade certified ingredients and products with a permitted maximum level of commingling for technical reasons of 5%.

Exceptions to this requirement in form of a temporary permission to apply the mass balance approach or a higher percentage of commingling during processing will only be granted in exceptional circumstances and for a limited period to allow manufacturers a change of production and supply chain management.

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