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RTRS Technical Unit

Document name	RTRS EU RED Group and Multi-site Certification Standard Version 3.5
Document reference	RTRS_G&MSC_STD _ 001_V3.5_ENG
Date	26 January 2022
Produced by	<p>RTRS Members, RTRS Secretariat and the Proforest Initiative</p> <p>Update by E4tech in accordance with revision of EU RED and EU FQD via the iLUC Directive (2015/1513) in October 2016.</p> <p>Update by E4tech in accordance with Renewable Energy Directive recast (EU) 2018/2001 (RED II) between October 2020 and June 2021.</p> <p>This document was approved by Executive Board at the meeting held on January 26, 2021, and will be submitted for ratification by the RTRS Participating Members.</p>

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The RTRS official languages are English, Spanish and Portuguese, however in case of any inconsistency between different versions of the same document, please refer to the English version as the official one.

RTRS Group and Multi-site Certification Standard

I. Introduction

a) Purpose of this document

This standard presents the requirements for soy producer groups that wish to apply for RTRS EU RED certification as a group and for individual companies that wish to apply for RTRS EU RED certification to cover multiple sites. The standard outlines a set of requirements related to the establishment of an Internal Control System (ICS) to ensure that the group members comply with the RTRS requirements for responsible soy production.

b) What is Group Certification?

Group certification is a mechanism designed to increase access to RTRS EU RED certification for smaller soy producers. Group certification allows group members to share the costs of the certification assessment, and subsequent annual surveillance assessments by applying for a single certificate. Group certification does not apply to other economic operators (e.g. soy processors, biodiesel producers, traders, transporters, etc.).

To further reduce their costs group members may choose to work or share information to meet the social and environmental requirements of the RTRS. Compliance with the RTRS EU RED standard may be enhanced through access to training and social control mechanisms (peer pressure). Some groups additionally choose to carry out joint marketing and sales of their products, providing further indirect benefits

Within group certification there are two important levels in a producer group and responsibilities are divided between them:

At *group level* the group manager (a central organization or individual) is responsible for applying for certification, and holding the certificate on behalf of the group. The group manager is responsible for communications with the certification body and group members, implementing the administrative requirements of group certification and for carrying out a programme of internal audits of the compliance of all the group members with the RTRS EU RED standard for responsible soy production.

At *group member level* group members are responsible for implementing any requirements of group membership, particularly in respects to compliance with the requirements of the RTRS EU RED standard for responsible soy production.

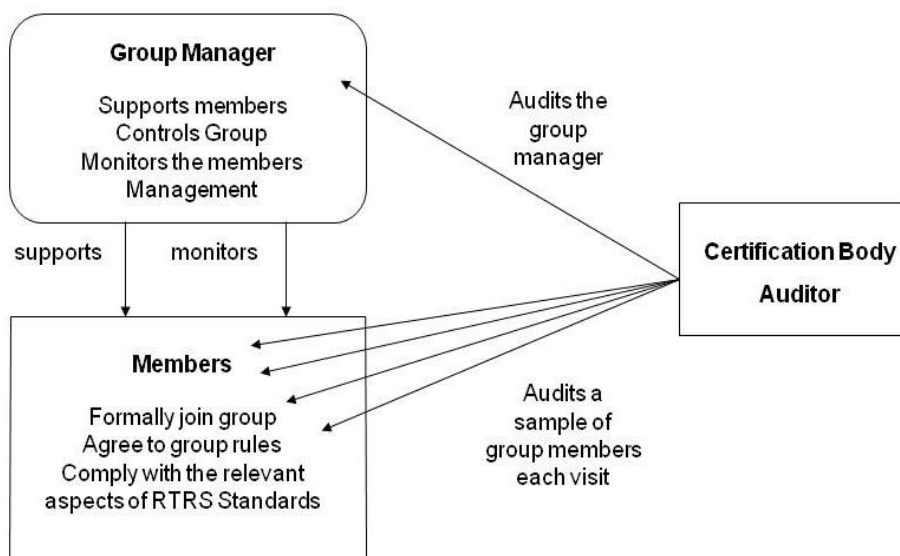


Figure 1: Group certification

c) What is Multi-site Certification?

The multi-site certification refers to the process of issuing a single certificate to cover multiple farms subject to the same and single management, having the right to use/exploit and control all the sites included in the scope of the multi-site certificate.

Control refers to the multi-site certificate holder's capacity to request the necessary changes to the sites in order to meet the RTRS standard requirements, the capacity to carry out audits, close out non-conformities and request corrective actions.

II. Scope

This document sets out the requirements for a group of soy producers or several soy production sites belonging to the same economic operator to be certified under a single certificate. It includes:

- a) The general requirements for soy producer groups or soy producers operating several sites that wish to apply for RTRS EU RED certification.
- b) The requirement for the management of the groups or multi-site organizations.
- c) Chain of custody requirements for groups or multi-site organizations.

This document shall be applicable worldwide.

Date of implementation:

This standard becomes effective on

Date of revision:

This standard will be reviewed within five years from the date of implementation at the latest.

III. Changes from Previous version

Version 3.4

Various updates in conformity with Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast) (RED II) and the Updated assessment protocol for voluntary schemes under RED II (July 2020).

IV. How to Use this Document

Group managers and multisite members: this defines the requirements which the group manager and the group members must comply with if seeking certification for a group of soy producers or multi-site organization.

Throughout this document, unless otherwise specified, the term "Group Manager" refers both to the organization or person responsible for a group certification scheme and to an organization, or a person responsible for such organization, managing a multi-site certification.

Throughout this document, unless otherwise specified, the term "group member/site" refers to "a member of a group scheme" or a site that is part of a multi-site scheme

Additionally:

If intending to sell RTRS EU RED certified soy into the physical supply chain: all of the group members must be in compliance with the RTRS Standard for Responsible Soy Production, the RTRS EU RED Compliance Procedure for Producers and the RTRS EU RED Chain of Custody Standard (Requirements for producers only).

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Certification bodies: this is an auditable standard. Any soy producers seeking certification **as a group or multi-site operation** against the RTRS Standard for Responsible Soy Production and/or the RTRS EU RED Chain of Custody Standard, must be in compliance with the requirements of this standard.

V. Definitions

Assessment	(See certification assessment and risk assessment)
Chain of Custody	The path along which RTRS EU RED certified soy passes, from its harvest on a farm, to the end user. Chain of Custody (CoC) certification is the process of giving a written assurance that an operation is in compliance with the RTRS EU RED requirements for handling and recording the handling of RTRS certified soy at a given point in the chain.
Certification	The procedure by which an RTRS recognized Certification Body gives written assurance that a clearly identified process has been methodically assessed such that adequate confidence is provided that specified products conform to the requirements of the relevant RTRS EU RED standards.
Certification assessment	<p>Process by which a certification body evaluates an organization against the relevant RTRS EU RED standard(s).</p> <p>Main assessment: the process carried out by a certification body to evaluate compliance with the relevant standard(s) when an organization or group first applies for certification.</p> <p>Annual surveillance assessment: the process carried out by a certification body on an annual basis to verify continuing compliance with the relevant RTRS EU RED standard(s).</p> <p>Re-assessment: the process carried out by a certification body when an organization or group seeks to be re-certified when the initial certificate is about to expire (usually after 5 years).</p>
Certification body	<p>Third party that assesses and certifies the compliance of organizations with respect to published standards or other normative documents</p> <p>In this document, the term 'Certification Body' refers specifically to RTRS-accredited bodies to assess soy growers for compliance to RTRS EU RED requirements.</p>
Corrective Action Request (CAR)	A request to resolve or close-out a specific nonconformity to the relevant standard, issued by either an internal or external assessor.
Group certification	Joint certification of a group of soy growers with the certification applying to the whole group.

Group manager	A central organization or individual, i.e. group manager, responsible for ensuring group's compliance with the RTRS EU RED standards and requirements and manages the group documentation.
Group management documentation	A documented set of procedures and processes that a group implements to achieve its specified requirements.
Group Member	A soy grower or farmer that has been accepted in the group as a formal member for inclusion in RTRS EU RED group certification. All formal group members shall comply to the required relevant RTRS Standard for Sustainable Soy Production as a prerequisite to joining a group
Internal audit	Process undertaken by the group manager to assess the members of a group against particular standards, other normative documents and internal policies
Internal control system (ICS)	A set of procedures and processes implemented by the group manager to ensure that the group members are in compliance with the relevant standards, other normative documents and internal policies.
Major non-conformity	<p>A nonconformity that either alone or in combination with further nonconformities, results in, or is likely to result in a fundamental failure:</p> <ul style="list-style-type: none"> (a) To achieve the objectives of the relevant RTRS EU RED Criterion, or (b) In a significant part of the applied management system. <p>or</p> <p>A serious nonconformity by the group manager in relation to conformity with the RTRS EU RED Standard for Group Certification, which leads the certification body to conclude that internal group or multi-site control systems are not functioning adequately.</p>
Minor nonconformity	<p>A nonconformity that:</p> <ul style="list-style-type: none"> (a) is a temporary lapse; (b) is unusual / non-systematic; (c) has impacts that are limited in their temporal and spatial scale; (d) does not result in a fundamental failure to achieve the objective of the relevant RTRS EU RED criterion or another applicable certification requirement. <p>or</p> <p>Where there is nonconformity by the group manager in relation to compliance with the RTRS EU RED Standard for Group Certification, which is isolated and does not prevent internal group or multi-site control systems from functioning adequately.</p>

Multi-site member	(See also site) A multi-site member is a soy production site which is included in the scope of a single RTRS EU RED certificate. The certificate holder is a legal entity which has the right to use/exploit and control ¹ of the member farms/sites.
Producer	An organization or individual growing soy, i.e. a farmer
Risk Assessment (by group managers)	Analysis carried out by the group manager to determine appropriate frequency of internal audit for each farm or site. An assessment of each group member or site to determine their risk of problems in ongoing compliance or meeting additional short-term or mid-term indicators. Factors to be taken into account include (but are not limited to) difficulties experienced by the farm or site in meeting the required entry level, challenges, limitations faced by the farm (financial, access to information, changes of employees, management or ownership, changes in legislation). Farms can be given a score, or can be classified as low, medium or high risk.
Roundtable on Responsible Soy (RTRS)	Not-for-profit association working to advance the production, procurement and use of sustainable soy products. www.responsiblesoy.org
RTRS Standard for Responsible Soy Production	RTRS requirements that shall be met by a producer to be RTRS certified. For RTRS EU RED certification, it is complemented by the RTRS EU RED Compliance Procedure for Producers.
RTRS EU RED Standard for Group Certification	RTRS EU RED requirements that shall be met by a producer group for group or multi-site certification.
Site	A soy-producing farm which one of a number of farms managed by employees of a single company. Site managers follow single centrally-determined policies on quality management, employment, health and safety, handling and storage of agrichemicals etc.
Stakeholders	An individual or group with a legitimate and/or demonstrable interest in, or who is directly affected by, the activities of an organization and the consequences of those activities.
Surveillance Assessment	A set of activities to monitor the continued fulfilment of requirements for certification.

VI. Requirements for group managers and groups

¹ Control refers to the multi-site certificate holder's capacity to request changes to the necessary sites to comply with the RTRS standard requirements, the capacity to perform audits, close out non-conformities and request corrective actions.

1. Group elements

1.1. Group manager

- 1.1.1. The group shall be managed by a central organization or individual, i.e. group manager that is responsible for ensuring group's compliance with the RTRS EU RED standards and requirements and manages the group documentation.
- 1.1.2. The group manager shall be a legal entity (e.g. an organization such as a company, NGO or cooperative) or an individual acting as a legal entity (e.g. an agricultural consultant).
- 1.1.3. Where the group manager is an organization, they shall appoint an employee (management representative) as having overall responsibility and authority for the group manager's compliance with all applicable requirements of this standard.
- 1.1.4. The group manager shall have sufficient financial, logistic and administrative capacity and human resources to manage the size of the group and the number of group members for which certification is sought.
- 1.1.5. The group manager shall comply with relevant legal obligations, such as payment of applicable fees and taxes.
- 1.1.6. The group manager shall have a written public policy of commitment to the requirements of the RTRS standard for Responsible Soy Production.
- 1.1.7. The group manager shall have the authority to issue internal corrective actions to any participating group member.
- 1.1.8. The group manager shall have the authority to remove a group member from the scope of the group or multi-site certificate if the group member is not in compliance with the requirements of participation or any corrective actions issued by the certification body or by the group manager.

1.2. Group composition

- 1.2.1. A group shall comprise group members/sites that have joined the group in compliance with the group membership requirements.
- 1.2.2. There is no limit to the number of group members/sites, providing that the group manager has documented systems and internal monitoring systems adequate for the size of the group and any planned growth.
- 1.2.3. There is no restriction on the size of individual group members' soy production area or total farm area.
- 1.2.4. For Group certification: Individual group members must include all of their soy production sites in the scope of the group certificate, unless they comply with the RTRS EU RED requirements for partial certification (See RTRS EU RED Accreditation and Certification Standard for Responsible Soy Production version 4.3 Section A 2.8.1)
- 1.2.5. Group members/sites of the same group/multi-site scheme shall be located within the same country and in areas with similar climatic conditions.
- 1.2.6. Group members/sites shall be located near each other and in the same ecological region (i.e. the farms shall have the same original vegetation type in broad ecological terms).
- 1.2.7. Group members/sites shall use the same or very similar production systems.

1.3. Applicable standards and requirements

1.3.1. The group manager shall demonstrate knowledge of and compliance with the RTRS EU RED Group and multi-site Certification Standard, the RTRS Standard for Responsible Soy Production, the RTRS EU RED Compliance Procedure for Producers and when applicable, the RTRS EU RED Chain of Custody Standard (requirements for producers).

1.3.2. The group members shall demonstrate knowledge of and compliance with the following:

1.3.2.1 group rules procedures, and group members' responsibilities;

1.3.2.2 the requirements of the relevant RTRS Standard for Responsible Soy Production and the RTRS EU RED Compliance Procedure for Producers.

Note: the RTRS operates a Progressive Entry Level system for soy production certification. The requirements of this system apply to both individual certification and group or multi-site certification.

1.3.2.3 the requirements for soy producers in the RTRS EU RED Chain of Custody Standard (Module C).
(if selling or intending to sell RTRS certified soy into the supply chain)

1.3.3. For those groups seeking to sell RTRS EU RED certified soy that complies with Non GM Chain of Custody System requirements (RTRS EU RED Chain of Custody Module D), the group manager and *all* the group members shall comply with the requirements of the module.

1.3.4. For those groups seeking certification against the RTRS EU RED Compliance Requirements for Producers, the group manager and *all* group members shall comply with the RTRS EU RED Compliance Requirements for Producers.

Note: existing cooperatives or organizations whose members wish to sell to different markets with different requirements should consider forming separate groups for the purposes of certification. Multi-site companies that intend for some of their sites to comply with the above standards should consider holding more than one multi-site certificate.

1.3.5. Group auditing for compliance with RTRS EU RED land related criteria is only acceptable when the areas concerned are near each other and have similar characteristics.

1.3.6. Group auditing for the purpose of calculating GHG savings is only acceptable when the units have similar production systems and products.

2. Group and multi-site management procedures

2.1. Group membership and site participation policies

2.1.1. (2.1.1 Applies to group certification only)

The group manager shall establish, implement and maintain written procedures for group membership covering all applicable requirements of this standard taking into account the scale and complexity of the group, including:

- a) Organizational structure;
- b) Responsibilities of group manager and group members;
- c) Rules regarding eligibility for membership of the group;
- d) Rules regarding withdrawal/suspension of members from the group;
- e) Clear description of the process to fulfil any corrective action requests issued internally and by the certification body including timelines and implications if any of the corrective actions are not complied with;
- f) Procedures and policies for the inclusion of new group members;
- g) Complaints procedure for group members (for making complaints to the group manager);

h) Management, use and disclosure of group member information.

2.1.2. *(2.1.2 Applies to multi-site certification only)*

The group manager shall establish, implement and maintain written procedures or policies for participation in the multi-site certification covering all applicable requirements of this standard taking into account the scale and complexity of the sites in the group, including:

- a) Responsibilities of group manager and participating sites;
- b) Clear description of the procedure to fulfil any corrective action requests issued internally and by the certification body including timelines and implications if any of the corrective actions are not complied with.

2.1.3. The group manager's procedures shall be sufficient to establish an efficient internal control system (ICS) ensuring that all members/sites are fulfilling applicable requirements.

2.1.3.1 Adequate training shall be provided by the group manager to ensure understanding of the requirements and fulfilment of them by the group members/sites.

2.1.4. Where the group manager is an organization rather than an individual, the organization shall nominate the personnel responsible for each procedure together with the qualifications or training measures required for its implementation.

2.2. Informed consent of group members

2.2.1. The group manager shall explain to each group member the following information, and ensure that the requirements are adequately understood:

2.2.1.1 Any obligations with respect to group membership, such as:

- a) Maintenance of information for evaluation and monitoring;
- b) Requirement to confirm with corrective action requests from group manager and CB;
- c) Requirements relating to use of the logo, communications and claims;
- d) Costs related to group membership;
- e) Any other obligations of group membership

2.2.1.2 Content of the applicable RTRS EU RED standard (s): i.e. the requirements to be met with regard to responsible production and associated supply chain management.

2.2.1.3 Explanation of the certification body process;

2.2.1.4 Explanation of the CB's and RTRS' right to access the group members' farms and documentation for purposes of assessment and monitoring.

2.2.2. The information shall be presented in a way adapted to the language and knowledge of the group members.

2.2.3. The group manager shall make available all of relevant documents containing the information in 2.2.1 to the group members.

NOTE: For some groups verbal explanations and training may be the most appropriate way to transmit this information. In others it may be appropriate to provide copies of all documents to members. Where summaries of these documents are provided, or where information is given verbally full documentation shall be readily available on request at the group manager's offices.

2.2.4. *(2.2.4 Applies to group certification only)*

The group manager shall demonstrate that all group members have signed a consent form or equivalent which states that each group member voluntarily agrees to participate in the group. The consent form shall include:

- a) a commitment to comply with all applicable certification requirements;
- b) acknowledgement and acceptance of the obligations and responsibilities of group membership;
- c) acknowledgement and acceptance of the role, rights and responsibilities of the group manager in managing the group;
- d) an agreement to be a member of the group, and
- e) an agreement to authorise the group manager to be the primary contact for certification and to apply for certification on the members' behalf.

NOTE: A consent form does not have to be an individual document. It can be part of a contract or any other document (e.g. meeting minutes) that specifies the agreed relationship between the group member and the group manager.

3. Control and monitoring of member/site compliance

A key element of group / multisite certification, is the role of the group manager in auditing all sites/group members to determine that they are complying with the relevant RTRS standard prior to their joining the group, and in carrying out a monitoring programme to ensure the continuing compliance of all members/sites throughout the duration of the validity of the certificate.

3.1. Group and multi-site internal audit

3.1.1. The group manager shall implement an internal audit programme consisting of:

- a) an initial audit of all members/sites;
- b) a regular and ongoing internal audit programme for all current members/sites.

3.1.2. All internal audits shall be documented and these records maintained for a minimum of 5 years.

Initial entry audits

3.1.3. **Prior** to seeking certification and once certified, **prior to** admitting any **new** member/site the group manager shall carry out an initial entry audit of each and every prospective member/site in order:

3.1.3.1 to ensure that they all fully comply with:

- a) all the relevant requirements of the applicable aspects of RTRS Standard for Responsible Soy Production and RTRS EU RED Compliance Procedure for Producers, and
- b) the requirements for producers of the RTRS EU RED Chain of Custody Standard (where relevant); and
- c) all requirements for participation in the group.

3.1.3.2 to carry out a simple risk assessment (see note below) for each group member. For each member (farm) the group manager shall evaluate the level of risk of future non-compliance and/or of failing to make adequate progress in the RTRS's Progressive Entry Level system.

Note: Risk assessment in this case refers to an assessment of each group member / site to determine their risk of problems in ongoing compliance or meeting additional short-term or mid-term indicators. Factors to be taken into account include (but are not limited to) difficulties experienced by the farm or site in meeting the required entry level, challenges, limitations faced by the farm (financial, access to information, changes of employees, management or ownership, changes in legislation). Farms can be given a score, or can be classified as low, medium or high risk. The

purpose of the risk assessment is to guide the group manager in determining appropriate frequency of internal audit for each farm/site (see 'ongoing program of internal audits' below)

- a) The group manager shall record the level of risk for each farm.
- b) Elements to include when assessing the level of risk include: problems identified during training or initial audit assessment, limitations of the group member to implement changes.

3.1.4. If any major nonconformities are identified, the group member must not be included in the scope of the certificate until this nonconformity is addressed.

Ongoing program of internal audits

3.1.5. The group manager shall use the risk assessment of each group member/site to determine the frequency of subsequent internal audits required for each farm to give the group manager confidence that all farms continue to be in compliance with all relevant RTRS requirements.

3.1.6. Higher risk farms shall be audited with a higher frequency than lower risk farms. Farms assessed as being at the lowest level in the Progressive Entry Level system must be audited with sufficient frequency to ensure compliance with the remaining RTRS 'short-term' and 'medium-term' indicators.

Note: Those farms/sites required to comply with additional indicators in years 2 and 3 must be subject to an annual audit in those years, to verify that compliance has been achieved prior to the assessment by the CB.

3.1.7. Once the group has been certified the group manager shall carry out an annual internal audit of each member/site at least once during the period of validity of the group certificate (5 years) a year, in addition to their initial entry audit, according the risk assessment developed by the group manager of the member/sites.

Note: It is expected that most members will require more frequent internal audits: once in 5 years is the absolute minimum acceptable, and would only be likely for very low risk group members.

3.1.8. Additional internal audits shall be scheduled when potential problems arise or when the group manager receives information from stakeholders or other group members about alleged non-conformity of the relevant RTRS Standard for Responsible Soy Production by group members.

3.1.9. The group members found to have nonconformities as part of the internal audit shall be issued with time-bound Corrective Action Requests (CAR) to address the nonconformity. These shall be identified as major or minor nonconformities.

3.1.10. Where nonconformities are judged to be **major**, members shall be given no more than 30 days to satisfactorily address the non-conformity. Failure to do this must result in them being excluded from the scope of the group certificate until the corresponding CAR is deemed by the group manager to have been satisfactorily addressed.

3.1.11. Where nonconformities are judged to be minor, members may remain within the scope of the group certificate providing they providing they fulfil the CAR within the time set by the group manager. Failure to fulfil the request in the agreed time period shall result in the CAR being upgraded to a **major** CAR. The process described in 3.1.10 shall then apply.

3.1.12. While members are excluded from the scope of the certificate their soy production is not covered by the RTRS group certificate and may not be sold as RTRS EU RED certified soy. In this situation group managers must record the volume of soy which is excluded from the group total, and adjust the total volume of certified soy produced by the group.

4. Record keeping

4.1. Record keeping standards and requirements

4.1.1. Group manager shall keep up to date records relating to all requirements of this standard. All records shall be kept for at least 5 years

4.1.2. Records to be kept include:

4.1.2.1 A copy of all consent forms / membership applications for group members

4.1.2.2 A list or database of group members/sites, including for each member:

a) Name and contact details;

b) Total size of farm, area to be certified, area under soy cultivation (recorded for each year of membership);

Note: for partial certification, group managers shall record the no. of hectares to be certified, and the number of hectares out of the scope of certification

c) Total production and production per unit area (in hectares) per year, including from at least one year before joining the group;

d) Geographical coordinates of member's farm(s) / sites

e) Date of membership acceptance and (where relevant) date of leaving group and reason for leaving

f) The level of risk assigned by the group manager

4.1.2.3 A map and/or other document demonstrating the location of the farms of the group members / sites.

4.1.2.4 Documents describing the group manager's internal control system, including risk assessment system, internal audit program and chain of custody systems.

4.1.2.5 Results from the initial entry audits, and internal audits including dates these were carried out, any corrective action requests (CARs) issued and/or closed out.

4.1.2.6 Records of total volumes of soy produced by the group and sold as RTRS certified, updated every year.

4.1.2.7 Where collective marketing is practiced by the group, records of total volumes of soy sold by the group on behalf of the group members.

5. Chain of Custody

5.1. Chain of Custody standards and requirements

5.1.1. Where the group members or the group manager intend to sell RTRS EU RED certified soy into the supply chain the group manager shall have a system in place to ensure that the RTRS EU RED certified soy sold by the group or group members complies with the relevant requirements outlined in RTRS EU RED Chain of Custody Standard.

Note: Only a small section of this standard applies to soy *producers*

5.1.2. Group manager shall have in place system for tracking and tracing of RTRS EU RED certified soy produced and sold by group members.

5.1.3. The group manager is responsible for ensuring that all sales of certified soy into the physical supply chain and into the Certificate Trading system are recorded, and that no double-counting takes place.

5.1.4. The generation of credits for the certificate trading system can only be done at the level of the certificate, and therefore certificate trading shall be managed centrally by the group manager. Individual group members shall not be permitted to sell tradable certificates.

- 5.1.4.1 For sales of soy into the 'physical' supply chain, the group manager shall either:
- a) have in place a system for tracking and recording any certified soy sold as such by individual group members/sites which documents all certified soy volumes sold, whether by group members or centrally; *or*
 - b) prohibit the sale of soy as 'RTRS EU RED certified' by individual group members: permitting only that certified soy is sold via the group manager
- 5.1.5. If any of the group members/sites or the group manager have soy processing operations and wish to use these to process RTRS EU RED certified soy they shall seek separate Chain of Custody certification for these operations.
- 5.1.6. The group manager shall ensure that all RTRS EU RED-related communication or claims at the level of the group, or by individual group members are in compliance with all applicable requirements of the RTRS EU RED Communication and Claims Policy.
- 5.1.7. In the context of RTRS EU RED certification of multi-site operations, each participating site shall operate its own mass balance system.