

Document name	RTRS EU RED Group and Multi-site certification procedure for CBs_V3.6
Document reference	RTRS_A&C_G&MSC_STD_V3.6_ENG
Date	26 January 2022
Produced by	<p>RTRS members, RTRS Secretariat and the Proforest Initiative February 2014 and October 2015 with changes made by RTRS Secretariat and Associate consultant</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>

This is a public document, for any comments regarding the content of this document or the RTRS Standard please contact the:

RTRS Technical Unit

technical.unit@responsiblesoy.org

and cc: info@responsiblesoy.org

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.

Group and Multi-site Certification: Requirements for Certification bodies

Introduction

The requirements in this document apply to those certification bodies wishing to offer:

- a) certification of soy producing groups and/or;
- b) certification of multi-site soy producing companies

ie. Verifying compliance of groups or multiple-site companies with the RTRS EU RED Group Certification Standard, which is a standard designed to be used in addition to the RTRS Standard for Responsible Soy Production V.3.2, and the RTRS EU RED Standard for Chain of Custody (producer requirements only).

The requirements of this document must be fulfilled in addition to the requirements of the RTRS EU RED Accreditation, the RTRS EU RED Certification Standard for Responsible Soy Production and the RTRS EU RED for Chain of Custody Certification standard.

Certification bodies wishing to offer group certification or multi-site certification for RTRS EU RED soy production must also be recognized by RTRS and accredited by an RTRS-endorsed accreditation body.

Certification bodies wishing to offer group or multi-site certification with additional CoC certification for groups, must already be recognized by RTRS and accredited by an RTRS-endorsed accreditation body against the requirements of the RTRS Accreditation and Certification Standard for Chain of Custody Certification.

This document shall be applicable worldwide.

Date of implementation:

This standard becomes effective on [Date of EU Approval]

Date of revision:

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

Change from previous version of this document

Version 3.5

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).

Definitions

See definitions in the RTRS Group and Multi-site Standard

Throughout this document, unless specified otherwise the term 'Group Manager' should be taken to apply equally to both the organization or individual responsible a group certification scheme, and a company managing a multi-site certification.

Throughout this document unless specified otherwise the term 'group member/site' should be taken to refer to 'a member of a group scheme' or site which forms part to a multi-site scheme.

1. Application and Approval process for CBs

1.1. General Accreditation Requirements

- 1.1.1. Certification bodies wishing to offer Group or Multi-site certification must be recognized by RTRS and accredited by RTRS-endorsed accreditation body to conduct RTRS Responsible Soy Production Certification and must additionally seek inclusion of Group and Multi-site certification in the scope of their recognition and accreditation.
- 1.1.2. Certification bodies can request to include Group and Multi-site certification within the scope of their recognition and accreditation for Responsible Soy Production Certification, or may seek it as an additional expansion of scope at a later date.
- 1.1.3. Certification bodies shall submit to RTRS and to the Accreditation Body their group and multisite certification procedures for recognition and accreditation.

2. Operational Requirements

2.1. General Operational Requirements

- 2.1.1. All operational requirements documented in Section A1 'Operational Requirements' of RTRS EU RED Accreditation and Certification Standard for responsible soy production also apply to group and multi-site certification.

2.2. Units of Certification

- 2.2.1. Group Certificate Holder : The group certificate shall be held by an organization, company or person that administers the certification, with legal entity and that covers all the farm operations participating in the group.
- 2.2.2. Multi-site certification Holder: Shall be held by a single legal entity(referred to here as “group and/or multi-site administrator”), having the right to use/exploit and control¹ of all the sites included in the scope of their multi-site certificate.

Note: refer to the RTRS EU RED Accreditation and Certification Standard for rules on partial certification.

- 2.2.3. The unit of certification shall include the farm of each group member/site. This includes fields where soy is cultivated but also all non-soy growing areas, non-cultivated areas, infrastructure, installations and other areas that form part of the farm.

3. Assessment requirements

3.1. General assessment requirements

- 3.1.1. All assessment requirements documented in Section A 2 'Assessment Requirements' of RTRS EU RED Accreditation and Certification Standard for responsible soy production also apply to group and multi-site certification except for those applying only to a single site.
- 3.1.2. Surveillance assessments shall take place annually.
- 3.1.3. 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.
- 3.1.4. Group auditing for the purpose of calculating GHG savings is only acceptable when the units have similar production systems and products.

3.2. Assessments of group manager

- 3.2.1. All certification assessments and annual surveillance assessments shall always include a visit to the group manager and assessment of the group manager's procedures and internal control system.

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.

3.2.2. The CB shall assess the group manager's procedures and Internal Control System for compliance in accordance with the Group and Multi-site Certification Standard.

3.3. Assessment visits to group members / sites

3.3.1. All certification assessments and annual surveillance assessments shall also include assessment visits (on site) to a sample of group members/sites.

3.3.2. During assessment visits to group members/sites CBs shall:

- a) assess compliance of the group member/ site with the relevant aspects of RTRS Standard for Responsible Soy Production and RTRS EU RED Chain of Custody Standard;
- b) gather information to determine the compliance with the group manager with the requirements of the RTRS EU RED Group and Multisite Certification Standard; in particular effective functioning of the Group Manager's internal control system, including internal audit programme and chain of custody control mechanisms;
- c) the CB shall explicitly review the group manager's risk assessment of each farm to determine the adequate functioning of their risk assessment system.

3.4. Sampling of group members or sites

3.4.1. The sample must be representative of the whole group and determined using a combination of risk and random selection (random selection must be used to select a minimum of 25% of the sample). The farms selected for audit should vary from year to year.

3.4.2. The CB shall determine an appropriate sample size for assessment visits to group members/sites based on²:

- a) The Group Manager's risk assessment (see RTRS EU RED Group and Multi-site standard);

Box 1, First step: the CB shall, first of all, determine **Risk Factors** for to be able to later **determining sample size for the audits**

First Step: Determine Risk factors for Main Assessment Visits:

Factors considered Low risk may include:

- the group or multisite being located in an area with no known land use conflicts,
- Its located in an area with little or no expansion of soy, low levels of clearance of native vegetation in the region,
- There is experience of the group manager of running similar schemes or systems,
- There is a high quality of documented ICS procedures sent to the CB prior to site visits.

High risk factors may include:

- The group is located in an , expansion area for soy, high levels of deforestation or native vegetation clearance for agriculture in the region
- A certain lack of experience of the group management exists or is considered

² Sample size: Sample size is defined as the minimum number of single sites that the auditor shall visit and audit in an RTRS audit, whether an initial certification, recertification or surveillance audit.

- ICS procedures received by the CB show low quality

Medium risk factors

- Medium risk is considered to exist when there is a mix of high risk and low risk factors in the group or multi-site
-

CBs should add in their procedures, their own risk assessment variables to this list, and provide guidance to their auditors for determining risk.

When determining the sample size, the CB shall document:

which is the risk considered to determine the sample,

and which are the variables considered to determine such risk (justification)

Risk factors for surveillance visits and re-assessments

Factors which may lead to a classification as 'low risk', in addition to those given above include:

3.4.2.1 no or few new members (fewer than 5% of the total number of group members) added since previous CB assessment

No expansion of land under soy cultivation since previous CB assessment.

Very few non-conformities raised on previous assessment

b) The Certification body's own assessment of risk, based on the characteristics of the group, and its members/sites (see Box 1).

3.4.3. **Second step** Once the risk has been determined on the basis of the variables above, the minimum sample size allowed for main certification assessments and reassessments shall be determined as follows but cannot be below 10%.

To determine the minimum sample size, the following formula shall be applied:

$$n^{\circ} \text{ of sites to visit} = 1 + \sqrt{y}$$

where:

"1" represents the central administration³

"y" is the quantity of members of the multi-site or group (without including the central administration).

Note: if there are decimals, the number is rounded off to the nearest whole number. If the decimal is equal to or above 5, the number is rounded up and if the decimal is below 5, the number is rounded down.

For RTRS EU RED certification of groups, the minimum fixed sample size is \sqrt{y} for all categories but cannot be smaller than 10%.

³ The central administration shall always be audited (initial, recertification and surveillance audits)

In summary:

Number of total members	Minimum sample size (Generic RTRS cert.)	Minimum sample size (RTRS EU RED cert.)
2-899	$1+\sqrt{y}$	\sqrt{y} or 10%, whichever is the smallest.
900-3600	$1+30$	\sqrt{y} or 10%, whichever is the smallest.
3601 and over	$1+\sqrt{y}/2$	\sqrt{y} or 10%, whichever is the smallest.

3.4.4. **Third step:** Use of the Correction Factor for medium and high risk.

When the risk identified by the CB in the “first step” is medium or high, then a correction factor shall be applied to the formula to calculate the sample size. The minimum sample size is 10% of the entire group.

For medium risk, the correction factor of 1.2 is used. Then, the formulas to determine the minimum sample size would be the following:

Number of total members	Minimum sample size to be audited for Medium Risk (Generic RTRS cert.)	Minimum sample size to be audited for Medium Risk (RTRS EU RED cert.)
2-899	$1+(\sqrt{y} \times 1.2)$	$\sqrt{y} \times 1.2$ or 10%, whichever is the smallest.
900-3600	$1+ (30 \times 1.2)$	$\sqrt{y} \times 1.2$ or 10%, whichever is the smallest.
3601 and over	$1+(\sqrt{y}/2) \times 1.2$	$\sqrt{y} \times 1.2$ or 10%, whichever is the smallest.

For high risk, the correction factor of 1.5 is used.

Number of total members	Minimum sample size to be audited for High Risk (Generic RTRS cert.)	Minimum sample size to be audited for High Risk (RTRS EU RED cert.)
2-899	$1+(\sqrt{y} \times 1.5)$	$\sqrt{y} \times 1.5$ or 10%, whichever is the smallest.
900-3600	$1+ (30 \times 1.5)$	$\sqrt{y} \times 1.5$ or 10%, whichever is the smallest.
3601 and over	$1+(\sqrt{y}/2) \times 1.5$	$\sqrt{y} \times 1.5$ or 10%, whichever is the smallest.

3.4.5. For surveillance assessments or follow-up minimum sample size calculations may be adjusted using a correction factor of 0.8 as follows:

Number of total members	Minimum Sample Size to be audited for Low Risk Surveillance or Follow-up (Generic RTRS cert.)	Minimum Sample Size to be audited for Medium Risk Surveillance or Follow-up (Generic RTRS cert.)	Minimum Sample Size to be audited for High Risk Surveillance or Follow-up (Generic RTRS cert.)
2-899	$1 + \sqrt{y} \times 0.8$	$1 + (\sqrt{y} \times 1.2) \times 0.8$	$1 + (\sqrt{y} \times 1.5) \times 0.8$ or 10%, whichever is the smallest.
900-3600	$1 + 30 \times 0.8$	$1 + (30 \times 1.2) \times 0.8$	$1 + (30 \times 1.5) \times 0.8$ or 10%, whichever is the smallest.
3601 and over	$1 + (\sqrt{y}/2) \times 0.8$	$1 + (\sqrt{y}/2) \times 1.2 \times 0.8$	$1 + (\sqrt{y}/2) \times 1.5 \times 0.8$ or 10%, whichever is the smallest.
Number of total members	Minimum Sample Size to be audited for Low Risk Surveillance or Follow-up (RTRS EU RED cert.)	Minimum Sample Size to be audited for Medium Risk Surveillance or Follow-up (RTRS EU RED cert.)	Minimum Sample Size to be audited for High Risk Surveillance or Follow-up (RTRS EU RED cert.)
2-899	\sqrt{y}	$\sqrt{y} \times 1.2$	$\sqrt{y} \times 1.5$ or 10%, whichever is the smallest.
900-3600	\sqrt{y}	$\sqrt{y} \times 1.2$	$\sqrt{y} \times 1.5$ or 10%, whichever is the smallest.
3601 and over	\sqrt{y}	$\sqrt{y} \times 1.2$	$\sqrt{y} \times 1.5$ or 10%, whichever is the smallest.

Where:

“1” represents the central administration

“0.8” is the correction factor for a surveillance or follow-up assessment

“ \sqrt{y} ” is the minimum sample size for low risk, which cannot be smaller than 10% of the entire group.

and where 1.2 and 1.5 are the correction factors when the risk of the group or multi-site is medium or high, as appropriate

3.4.6. **Fourth Step:** Once the minimum sample size has been determined according to the risk of the group or multi-site specified by the CB, the certification body shall perform stratification, i.e., grouping the sites to be audited under certain criteria (see Chart 2)

Chart 2. Stratified Random Sampling

Stratified random sampling is one of the easiest ways to ensure the representativeness and randomness in the selection of group members to be included in the sample.

Once the EC has identified the sample size according to the risk, and the sites conditions are heterogeneous for example regarding:

- Employees: For example, there is new staff in some sites, which could mean that there is an increased risk that the staff is not well trained on the RTRS and RTRS EU RED standards
- , Group Manager risk analysis: if the risk analysis carried out by the group Manager determines the existence of medium or high risk in some of the group sites or multi-sites administered by such Manager, it may mean that the CB may want to stratify by considering it as a stratum within the sample to be audited.
- new sites: the addition of new sites could imply a higher risk due to the lack of mature systems or fully trained people among others),

The CB shall perform the necessary stratifications within the sample, even by enlarging the minimum sample, to ensure the representation of the characteristics of the sites to be audited.

For this, group members are categorized into 'sets' (strata) according to the criteria previously mentioned. Then members from each set (stratum) are chosen at random to be visited by the CB.

There are different techniques to do it randomly . One way to do this is to give all the members in each stratum a number and use a '*random number generator*' to decide which ones to visit. Alternatively, all the farm names in each stratum can be written down and put into a bag to be drawn out at random.

Randomness is important - it ensures that the certification body is not unduly influenced by the suggestions of the group manager, or ease of vehicle access etc.

The selection of sites or the definition of strata shall not be made for geographic convenience only

3.4.7. Based on the requirements of Chart 2 the CB shall identify, when the conditions of the group or multi-site are heterogeneous(see box 2) appropriate strata based on the information provided by the group manager on the group members, and on the Group Managers risk assessment. Appropriate categories to use for stratification may include:

The categories of risk used by the group manager (e.g. low, medium, high, or other classification)

Geographical regions

Personnel within the Group Manager responsible for support and/or initial audits

3.4.8. Within the strata the certification body shall include a random element in the selection process (See Box 2).

3.4.9. Additionally the CB shall include in the assessment all the group members who have any outstanding Corrective Action Requests from the previous CB assessment.

3.4.10. For annual surveillance assessments, the CB shall ensure that a sample of new members who have joined the group since the previous assessment are visited

3.4.11. The CB shall additionally take into account stakeholder concerns, complaints, unusual or unclear records about the group member held by the Group Manager or other factors, when determining sites to visit.

3.4.12. The certification body shall not choose group members/sites to be visited based on convenience of logistics or time constraints.

3.5. Non-conformities

3.5.1. Issuing of non-conformities and Corrective Action Requests (CARs) shall follow the requirements of the RTRS Accreditation and Certification Standard for Responsible Soy Production (Module A).

3.5.2. The CB shall also explicitly define the methodology by which the CB determines non-conformities of a group assessment: both for main assessments, and at the time of surveillance assessments. The specification of non-conformities shall distinguish between 'group non-conformities' and 'member (site) non-conformities', where:

3.5.3. **Group non-conformities** may lead to corrective action requests (CARs), suspension or withdrawal of the group certificate, and may be caused by:

Failure to fulfil a group manager responsibility, such as administration, audit programme, record-keeping, etc.

Failure of the group manager to ensure that group members comply with a CAR issued by the CB

Failure to fulfil a group member responsibility/ies sufficient in number, extent and/or consequences to demonstrate that the group manager's system for internal audit, or quality control has broken down.

Note: the number as well as the seriousness of member non-conformities may each contribute to group non-conformities: many minor non-conformities, or a few major non-conformities may both suggest a breakdown in the group system for quality control, and may be considered sufficient reason to withdraw a group certificate.

3.5.3.1 Identification by the CB of a systemic failure of the Internal Control System shall result in the issuing of a **Major** Corrective Action Request, and suspension of the group certificate, including all group members within the scope of the certificate until the group manager demonstrates that the CAR has been adequately addressed.

3.5.4. **Member (site) non-conformities** may lead to corrective action requests, suspension or expulsion of a group member/site, and may be caused by:

Failure of an individual RTRS principle, criteria or indicator at the level of an individual group member/site.

3.5.4.1A **major** non-conformity identified by the CB as limited to a group member/site and not symptomatic of a broader system failure shall result in the issuing of a major Corrective Action Request. (See Module A in the RTRS EU RED Accreditation and Certification Standard for Responsible Soy Production).

3.5.5. If a group member is suspended from the group by the CB due to unsatisfactory resolution of a major non-conformity in the given period, none of their soy product may be sold as RTRS EU ED certified during the period of their suspension. The CB shall ensure that the group manager records the amount of soy affected by this suspension, and adjust the total volume of soy produced by the group accordingly.

3.5.6. The CB shall not issue a certificate of compliance or re-issue a certificate until any major non-conformity is closed out to the satisfaction of the certification body.

3.5.7. As per the RTRS EU RED requirements for Accreditation and Certification, major non-conformities raised during a surveillance assessment must be closed out to the satisfaction of the CB within 30 days of the CAR being raised. Failure to do so will result in the suspension of the certificate.

3.6. Issuing of certificates

3.6.1. The allocation of certificate numbers for any RTRSEU RED group certificates shall follow the system laid out in the section VI of RTRS EU RED Accreditation and Certification Standard: for Soy Production Certification (Section 3.5).

3.7. Reporting

3.7.1. In addition to the reporting template (the RTRS EU RED Accreditation and Certification Standard, Annex 4). Certification bodies shall record and report the following information:

- a) Number of group members/sites and size of properties of each
- b) Names of each group member/site
- c) Sample size estimation, justifying risk allocation and the criterion used for the stratification and selection of sites to be audited.



Note: for Groups this should be the name of the farm/property and the name of the owner or manager responsible.

For sites, this should include the farm name, and/or reference number.