

RTRS Grievances Procedure Version 1.1

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Version 1.0 is mandatory from December 2021



This is a public document of the Round Table on Responsible Soy Association (RTRS), for any comments regarding the content of this document or the RTRS Standard please contact the:

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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.

I. Introduction

This procedure aims to address grievances and complaints regarding the development or implementation of any element of the RTRS system, including but not limited to the RTRS Association, Standard and Certification System.

Important Note: Additional rules may apply specifically in the context of EU RED certification. Please refer to the corresponding documentation for details.

II. Objectives

The objectives of this procedure are:

- To describe and clarify the process, whereby complaints and grievances from third parties are being handled, processed and settled by the RTRS;
- To ensure any grievance or complaint is transparently, objectively and consistently handled, processed and settled in line with RTRS Statutes, Terms of Reference and ISEAL Codes of Good Practice;
- To provide a contact point for official complaints and grievances against the RTRS.

III. Scope

This procedure may be used by any individual or organisation, including RTRS members non-members and other stakeholders.

Complaints and grievances may be filed regarding any non-conformity, breaches or misuse of any element of the RTRS System, including but not limited to:

- RTRS Membership, statutes and governance rules;
- RTRS Standard, including the process for developing/revising RTRS standards and related documents;
- RTRS Certification, including audit processes, the issuance/suspension/withdrawal of certificates, RTRS certification bodies and auditors, as well as RTRS accreditation mechanism;
- RTRS trademark, including the use and trade of RTRS certificates, use of compliance claims, use of the RTRS logo and other brands.
- Report any misrepresentation or corruption under RTRS scope

This procedure is not intended as a replacement for legal or judicial system. The decisions resulting from this procedure gives general guidance only and should not be regarded as a complete and authoritative statement.

IV. Overview of the complaint and grievance resolution process

As a general principle, complaints and grievances shall be tentatively resolved at operational level, i.e. certification bodies, accreditation bodies and the RTRS Secretariat. Complaints and grievances shall only be escalated to the RTRS Grievance Committee (See below) or to the Executive Board whenever no acceptable settlement was found at a lower level.

V. Detailed complaint/grievance resolution process

a. Filing a complaint/grievance

With the exception of complaints and grievances related to audit processes, issuance/suspension/withdrawal of RTRS certificates and accreditation of Certification Bodies, any complaint or grievance shall be sent to the RTRS Secretariat by email at grievances@responsiblesoy.org.

Any complaint or grievances related to audit processes and issuance/suspension/withdrawal of RTRS certificates shall be sent to the certification body (CB) in charge of the process, which the complaint/grievance relates to.

Any complaint related to the accreditation of certification bodies shall be sent to the accreditation body (AB), or if no accreditation body is designated, to the RTRS Secretariat. For the complaint/grievance to be considered valid, the complainant shall provide all of the following information:

- i. Identity and legal details of the complainant and contact details.
- ii. The organisation targeted by the complaint/grievance, e.g. RTRS Secretariat, RTRSMember, certified operator, third party, etc.
- iii. The nature of grievance and which RTRS standards, procedures or documents it is based on.
- iv. Supporting evidence, including all possible documentation, etc. to directly support the complaint.
- v. Details of previous steps that were undertaken to seek resolution directly, prior to turning to this procedure, if any.
- vi. Clear, concise and specific actions, proposed activities or steps that are needed to correct problems rose in complaint.

b. Processing complaints/grievances

1. Upon reception, the RTRS Secretariat/CB/AB shall verify the completeness of the complaint/grievance and if the case, trigger a complaint/grievance resolution process. Whether the complaint/grievance is accepted or rejected, RTRS Secretariat/CB/AB shall inform the applicant within two weeks following the submission of the complaint/grievance, along with explanations regarding the timeline and next steps in case of acceptance.
2. Upon validation, the RTRS Secretariat/CB/AB shall examine the submitted complaint/grievance and associated documentation to assess its validity and suggest options for settlement.
3. RTRS shall keep track of all grievances received in a grievances Log that shall include information such as: type of grievance, party in charge of its resolution, date of reception, parties involved and resolution. The grievance log shall be shared with the RTRS Executive Board on a quarterly basis and made available to any RTRS member upon request and within confidentiality rules.

c. Settling complaints/grievances

1. To the extent possible, any settlement shall be in line with existing RTRS rules, standards and procedures, while addressing the issues raised in the complaint/grievance. Any decision regarding settlement shall be validated by either the RTRS Executive Director, or the Head of the CB, or the Head of the AB, depending on the case.
2. The settlement decision shall be communicated to the applicant, along with the detailed justification for the decision, within two months following the submission of the complaint/grievance. The applicant may file an appeal within two weeks following the communication of the decision.
3. Whenever no settlement could be found at the RTRS Secretariat/CB/AB level or, if the applicant files an appeal regarding the initial settlement decision, the complaint/grievance shall be escalated to the Grievance Committee (GC). Details about the GC are available in Annex.
4. The GC shall examine the complaint/grievance and decide on a settlement within two weeks following the reception of the escalated complaint/grievance. To the extent possible, any settlement shall be in line with existing RTRS rules, standards and procedures, while addressing the issues raised in the complaint/grievance.
5. Whenever a settlement decision is taken by the GC, it shall be communicated to the applicant, along with the detailed justification for the decision, within three months following the submission of the complaint/grievance. The applicant may file an appeal within two weeks following the communication of the decision.
6. Whenever no settlement could be found at the GC level or, if the applicant files an appeal regarding the GC settlement decision, the complaint/grievance shall be escalated further to the Executive Board (EB).
7. The EB shall examine the complaint/grievance and decide on a settlement within two weeks following the reception of the escalated complaint/grievance. To the extent possible, any settlement shall be in line with existing RTRS rules, standards and procedures, while addressing the issues raised in the complaint/grievance.
8. The settlement decision taken by the EB shall be communicated to the applicant, along with the detailed justification for the decision, within four months following the submission of the complaint/grievance. The applicant cannot file an appeal.

d. Specific provisions for grievances related to the implementation of the RTRS EU RED certification program

In line with Directive (EU) 2019/1937:

1. Any internal or external party filing a grievance in relation to the implementation of the RTRS EU RED certification program by economic operators, certification bodies, auditors, RTRS members or staff, is entitled to require full confidentiality and data protection by notifying the CB, AB or RTRS upon filing the grievance.
2. For internal or external parties requiring full confidentiality and data protection (e.g. whistleblowers), the CB, AB or RTRS receiving the grievance shall ensure that all data allowing the identification of the applicant (e.g. name, address,

location, etc.) are stored in a protected space with access restricted to authorized personnel only. Upon escalating the grievance, the authorized personnel shall not transmit any data allowing the identification of the applicant. The rest of the complaint/grievance resolution process described in Sections a, b and c remain unchanged.

3. To the extent possible, grievances filed by whistleblowers shall be treated in priority and more quickly than regular grievances.
4. Should grievance be filed by any RTRS staff, RTRS member, accredited RTRS EU RED auditor of RTRS EU RED certified operator, the CB, AB or RTRS shall not permit any subsequent retaliation measure impacting the party filing the complaint/grievance.
5. The CB, AB and RTRS shall ensure all RTRS staff, RTRS member, accredited RTRS EU RED auditors of RTRS EU RED certified operators are aware of the possibility to file a complaint/grievance in full confidentiality.

Annex – The Grievance Committee

- The purpose of the Grievances Committee is to preside and deliberate on legitimate and valid complaints and grievances, which cannot be settled at the RTRS Secretariat/CB/AB level. The GC shall decide on settlement or resolution for the filed complaint/grievance, in line with RTRS rules, standards and procedures, while addressing the issues raised in the complaint/grievance.
- The GC may also provide specific recommendations for the practical implementation of the settlement decided.
- The RTRS Grievance Committee's core members are its 3 Vice-Presidents. Additional RTRS Participating or Observer Members may be called-upon to participate in it, as deemed appropriate by the core Grievance Committee.
- Whenever the GC decides to escalate the complaint/grievance further, adequate justification shall be transmitted to the Executive Board, along with the initial complaint/grievance.



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