SRP Chain of Custody Policy and Standard v1.0
Online Public Consultation: Changes Document

Background
The SRP Assurance Scheme offer users a robust, yet cost-effective basis for verifiable claims for rice produced according to the SRP Standard for Sustainable Rice Cultivation v 2.1. The Scheme is managed by GLOBALG.A.P. as SRP’s Assurance Service Provider.

Following launch of the SRP Assurance Scheme v 1.3 document in September 2020, the SRP Secretariat and the SRP Chain of Custody Task Force worked to finalize the associated normative guidance documents for the SRP Internal Management System (IMS) for Producer Groups v 1.0 as well as the SRP Chain of Custody Policy and Standard. As per ISEAL requirements, a 30-day online open public consultation was conducted from 27 August to 26 September 2020. Over 50 comments were received from the following participating organizations:

- Ebro/Herba
- Mars Food
- GIZ
- GLOBALG.A.P.
- NEPCon
- Olam
- Oxfam

All comments have been documented, reviewed and addressed by the SRP Secretariat in consultation with the multi-stakeholder SRP Chain of Custody Task Force, including SRP members and external dialogue partners. The recommendations are reflected in the now publicly available final version normative guidance documents posted to the SRP website: [http://www.sustainablerice.org](http://www.sustainablerice.org)

Purpose
This document (downloadable from the SRP website) presents only substantive changes to the Chain of Custody Policy and Standard v 1.0 main text and Annexes made as a result of the public consultation process. Minor edits to style, language and formatting are not documented here. However, all comments and substantive changes are recorded in track change in the document itself, together with responses and changes made; this document is also available by request from the SRP Secretariat.

Summary of Substantive Changes

Glossary

- Major editorial changes in several of the definitions. Additional definitions added, including for Certification Cycle, Mass Balance, Single and Multi-site Participating Operator. A footnote added to Assurance Service Provider definition provides reference to the Cooperation Contract and Service-Level Agreement between SRP and GLOBALG.A.P. (June 2020).
1. Introduction
   • Section 1.1 “Background”: Numerous editorial changes for clarification.
   • Section 1.2 “Scope and effective date”: Editorial changes for clarification. In addition, entirely new sections 1.2.4-6 inserted outlining guidance on Exceptions and procedures as per ISEAL requirements.
   • Section 1.3 “Certification Body Application Process for SRP CoC”: This section is entirely new.
   • Section 1.4 “Certification Body Participants in the Audit Process”: Editorial changes for clarification.

2. Chain of Custody Certification Rules
   • Section 2.1 “Chain of Custody Audit Scope”: Numerous editorial changes for clarification. Entirely new section 2.1.3 added to state that the certification cycle for SRP CoC is three (3) years.
   • Section 2.2 “Type of audit and frequency”: Numerous major editorial changes for clarification, including section 2.2.4 on timing of annual audits.
   • Section 2.3 “Conformance Evaluation”: Numerous major editorial changes for clarification, including section 2.3.2 revising to 28 calendar days the timeframe for corrections to be made and accepted once the audit reveals non-conformity.
   • Section 2.4 “Certificate Termination and Sanctions”: Numerous major editorial changes for clarification.
   • Section 2.5 “Certificate Reinstatement”: Numerous major editorial changes for clarification.
   • Section 2.7 “Multi-site Sample Planning”: Numerous editorial changes for clarification.
   • Section 2.8 “CB Permitted Support”: Numerous editorial changes for clarification.
   • Section 2.9 “CB Support Not-Permitted”: Idem as above.

3. Chain of Custody Certification Process
   • Section 3.1 “Application Process”: Numerous major editorial changes for clarification.
   • Section 3.2 “Audit Plan Development”: Numerous major editorial changes for clarification.
   • Section 3.3 “Audit Execution”: Numerous major editorial changes for clarification, including in section 3.3.3 dealing with evidence of conformance and in section 3.3.6 dealing with functions and activities that must be completed as part of the audit closing meeting.
   • Section 3.4 “Audit Report and Review”: Numerous editorial changes for clarification.
   • Section 3.5 “Certification Decision”: Idem as above.
   • Section 3.6 “Client Review and Appeals”: Idem as above, including to clarify appeal decision process.
   • Section 3.7 “Issuing the Certificate”: Numerous editorial changes for clarification.

Annexes 1-4

1. Annex 1: Certification Process Timeline Rules
   • Numerous editorial changes in text in most boxes in figure for clarification.

   • Requirement#1 “General Chain of Custody Requirements”: Numerous editorial changes for clarification.
• Requirement#2 “Chain of Custody Models”: Numerous major editorial changes for clarification.
• Requirement#3 “Data Validation”: Numerous major editorial changes for clarification, including reference to Annex 4 deleted given decision to delete this annex.
• Requirement#4 “Data Reconciliation”: Numerous major editorial changes for clarification, including clarifying timeframe for SRP data recording by PO as part of criterion 4.1.
• Requirement#5 “Processing”: Few editorial changes for clarification.
• Requirement#6 “Shipping and Sales”: Few editorial changes for clarification.
• Requirement#7 “Claims and Public Information”: Few editorial changes for clarification. Outstanding issue still to be resolved: SRP Secretariat to decide on who reviews proposed label use and claims to be made.

3. Annex 3: Mass Balance Requirements
   • Major text changes made throughout this annex for purpose of clarification.

4. Annex 4: SRP Data Validation of Supplier
   • Entire annex deleted.

Document date: 10 December 2020