



**Sustainable Rice Platform**

**Chain of Custody (CoC) Policy and  
Standard**

Version 1.0

October 2020

[www.sustainablerice.org](http://www.sustainablerice.org)

# SRP Chain of Custody (CoC) Policy and Standard Version 1.0

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SRP (2020). The SRP Chain of Custody Policy and Standard (Version 1.0), Sustainable Rice Platform. Bangkok: 2020. Available at <http://www.sustainablerice.org>

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This document has been prepared by a Sustainable Rice Platform (SRP) expert group led by Control Union and NEPCo, supported by the SRP Task Force on Chain of Custody following extensive consultation with SRP members and external stakeholders, with key contributions by GLOBALG.A.P.

## Disclaimer

The views expressed in this document are those of the authors and may not in any circumstance be regarded as representing an official position of the organizations involved.

## About the Sustainable Rice Platform (SRP)

The Sustainable Rice Platform (SRP) is a global multi-stakeholder alliance with over 100 institutional members from public, private, research, civil society and the financial sector. It is co-convened by Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH, the International Rice Research Institute (IRRI), and the United Nations Environment Programme (UNEP). SRP works with partners to transform the global rice sector by improving smallholder livelihoods; reducing the social, environmental and climate footprint of rice production; and by offering the global rice market an assured supply of sustainably produced rice.

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## TABLE OF CONTENTS

GLOSSARY.....	4
1. INTRODUCTION .....	6
1.1. Background.....	6
1.2. Scope and Effective Date .....	7
1.3. Certification Body Application Process for SRP CoC .....	7
1.4. Certification Body Participants in the Audit Process .....	7
2. CoC CERTIFICATION RULES.....	9
2.1. Chain of Custody Audit Scope .....	9
2.2. Type of Audit and Frequency .....	9
2.3. Conformance Evaluation.....	11
2.4. Certificate Termination and Sanction .....	12
2.5. Certificate Reinstatement.....	12
2.6. Certification Process Timeline Rules.....	13
2.7. Multi-site Sample Planning.....	13
2.8. CB Permitted Support .....	14
2.9. CB Support not Permitted .....	14
2.10. CoC CERTIFICATION PROCESS .....	15
2.11. Application Process.....	15
2.12. Audit Plan Development .....	15
2.13. Audit Execution.....	16
2.14. Audit Report and Review .....	17
2.15. Certification Decision .....	17
2.16. Client Review and Appeals.....	18
2.17. Issuing the Certificate .....	19
Annex 1: Certification Process Timeline Rules.....	20
Annex 2: Sustainable Rice Platform (SRP) CoC Standard.....	21
Annex 3: Mass Balance Requirements.....	25

## GLOSSARY

**Assurance scheme:** scheme providing verified assurance of conformance to a normative standard.

**Assurance Service Provider (ASP):** organization mandated by SRP to operate the SRP Assurance Scheme. GLOBALG.A.P. serves as SRP's only ASP<sup>1</sup>.

**Certification Body (CB):** independent organisation that is ISO 17065-accredited and recognised by an accreditation body for its competence to audit and issue certification confirming that an organisation meets the requirements of the SRP Chain of Custody Standard.

**Certification cycle:** is the period from the point of initial certification to re-certification, or from re-certification to the following re-certification. For SRP Chain of Custody it is three years cycle.

**Claim category:** the type and claim being tracked within the CoC control system. Where the Organisation's CoC system is Identity Preservation, the claim category will include both the SRP verification status of the rice and the farmer or producer group from where the rice has been sourced. In instances where the Organisation's CoC system is Segregation, the claim category will include SRP-verified rice.

**Consignment:** quantity (e.g. batch, lot, load) of product mass with attached data specifying the product content in terms of kilograms and sustainability characteristics.

**Conversion factors:** are the ratio between the output material and the input material. Conversion factors will be specific to facilities and should be accurately documented in the mass balance system.

**Data Collector:** responsible for collecting registration and self-assessment data from producers and uploading to the SRP database. A Data Collector may be a farm assurer, a research institute, company, extension worker, project owner, group manager or miller.

**Document:** information and its supporting medium. The medium can be paper, electronic, photograph or a combination.

**Finished product:** a finished product is a product where no further modification occurs (including repacking).

**Identity Preservation (IP):** is a type of CoC model which assures that the SRP-Verified rice product delivered to the end-user is uniquely identifiable to its verified supply base, and includes the details of farmer or producer group.

**Inventory period:** a consistent period over which physical SRP-Verified rice and sustainability data are reconciled. Unallocated sustainability data may be carried over to the next inventory period following Mass Balance requirements set out in Annex 3.

**Mass Balance (MB):** is a type of CoC model which is an overarching term for various, slightly different, types of Chain of Custody which involve balancing volume reconciliation.

**Multi-site Participating Operator:** An entity that administers two or more sites. The CoC certificate is issued for multi-site scope.

**Outsourcing:** subcontracted manufacturing or other handling services of materials/products by an independent third party.

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<sup>1</sup> Cooperation Contract and Service-Level Agreement between SRP and GLOBALG.A.P., June 2020

**Participating Operator:** individual, company or organisation which has ownership and/or control of rice and/or all rice-derived products, from their origin to their market availability, for one or several steps in the supply chain.

**Producers:** individuals or entities legally responsible for production of the rice sold by those individuals or businesses and who are eligible to apply for SRP evaluation under the Scheme.

**Reporting period:** this will be one year, starting from certification date, unless otherwise agreed.

**Segregation System:** is a type of CoC model which assures that the SRP-verified rice products delivered to the end-user come only from SRP-verified sources.

**Single Participating Operator:** An entity that administers only one production and/or processing facility but may administer one or more offices. The CoC certificate is issued for a single PO.

**Site:** a site is defined as a geographical location with precise boundaries within which products can be mixed.

**SRP Secretariat:** responsible for managing SRP's activities and programmes under the strategic oversight of the SRP Executive Board.

**Supplier:** previous legal owner of the product in the Chain of Custody.

**Sustainability characteristics:** sustainability characteristics refer to whether or not a consignment of paddy, milled rice and any other rice by-product, complies partly or fully with SRP environmental, social and economic criteria. When residues and waste are produced, in addition to the main product, sustainability characteristics shall equally apply to all.

**Traceability:** the ability to verify the history, location, or application of an item by means of documented recorded identification.

**Verification Code:** a unique code awarded to an organisation which has certified or verified part or all of its products according to the Assurance Scheme.

# 1. INTRODUCTION

## 1.1. Background

- 1.1.1. The Sustainable Rice Platform (SRP) is a global multi-stakeholder alliance of over 100 institutional members from public, private, research, civil society and the financial sector. The SRP initiative was originally co-convened by the International Rice Research Institute (IRRI), the United Nations Environment Programme (UNEP) and Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH (GIZ) and is now an independent member association. SRP works with partners to transform the global rice sector by improving smallholder livelihoods, reducing the social, environmental and climate footprint of rice production; and by offering the global rice market an assured supply of sustainably produced rice.
- 1.1.2. Established in 2011, the SRP aims to secure adoption of sustainable farming practices among at least 1 million rice farmers by 2023. In 2015 the SRP launched the world's first global Standard for Sustainable Rice Cultivation (the SRP Standard), providing a working definition of sustainability in any rice system and allowing sustainability scoring at farm level. In addition, a linked set of SRP Performance Indicators (PI) enables collection of farm data to quantify and verify improvements and impacts of best practice adoption.
- 1.1.3. The SRP Chain of Custody Standard is intended to be used in conjunction with the SRP Standard<sup>2</sup>, Assurance Scheme<sup>3</sup> and Performance Indicators<sup>4</sup> to enable market actors to make verifiable sustainability claims for rice produced using proven, climate-smart, sustainable best practices.
- 1.1.4. The Chain of Custody Standard was developed by the SRP Working Group on Standards, Assurance and Impact, as mandated by the SRP's Advisory Committee and in line with ISEAL Guidelines. The Working Group convened in February 2017 with representatives from Control Union, Ebro Foods, GIZ, GLOBALG.A.P., IRRI, NEPCon, Mars Food, PRIME Agri, Rikolto, Syngenta, UNEP, UTZ, VSR Rice, WCS Cambodia, Winrock and WWF Pakistan. A workshop in May 2017 brought Working Group members together to discuss the broad framework and scope of the Assurance Scheme, including rules and processes for accreditation, auditor qualifications and an Internal Management System (IMS) for producer groups.
- 1.1.5. Following the recommendations of an SRP Strategic Visioning Workshop in May 2018, the focus of the Assurance Scheme shifted from certification to verification, ultimately resulting in the removal of the certification level from scope.
- 1.1.6. Launched on 14 September 2020 following an open public consultation, the SRP Assurance Scheme recognizes three different types of Chain of Custody models: Identity Preservation (IP), Segregation System (Seg) and Mass Balance (MB). Chain of Custody certification is required for on-product use of SRP claims and use of the on-pack SRP- Verified Label.
- 1.1.7. Unless otherwise stated, all aspects of this Standard are considered to be normative, including the Standard scope and effective date, references, Glossary, requirements, notes, tables and annexes.
- 1.1.8. Sustainability should not stop being a focus after the farm gate, and SRP aims not only to assure traceability but also continuous improvement and conformance with SRP's social criteria for all actors in the rice value chain (see the SRP Standard criteria: 35–41: child labour, forced labour, worker health, freedom of association, wages). Although this CoC Standard does

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<sup>2</sup> [SRP Standard for Sustainable Rice Cultivation version 2.1 - January 2020](#)

<sup>3</sup> [SRP Assurance Scheme version 1.3 - August 2020](#)

<sup>4</sup> [SRP Performance Indicators for Sustainable Rice Cultivation version 2.1 – January 2020](#)

not yet include these social criteria, it is the intention of SRP to start developing this as a full and integral component in an early revision of the CoC Standard.

## 1.2. Scope and Effective Date

- 1.2.1 The Chain of Custody (CoC) Standard is the core standard that specifies requirements for all Chain of Custody-verified and applicant organisations with respect to sourcing, processing, labelling, and sale of rice-based products as SRP-Verified.
- 1.2.2 All organisations in the supply chain – from farmer to the entity implementing final packaging of products carrying an SRP claim – shall be covered by the SRP CoC certification system, to be managed by an SRP-approved CoC Certification Body. CoC certification shall cover all relevant activities conducted by the certified Participating Operator (including purchasing, processing, storage, marking, record-keeping etc.) to ensure segregation of SRP-Verified rice from non-verified rice. Certified Operations implementing the Mass Balance CoC model must also comply with additional specific requirements for Mass Balance as set out in Annex 3 and in the SRP Assurance Scheme<sup>5</sup> itself.
- 1.2.3 The CoC Standard applies to any Participating Operator purchasing, handling and/or trading SRP-Verified rice. It describes the requirements to ensure traceability of SRP-Verified rice by implementing a Chain of Custody system under one of three models: Identity Preservation (IP), Segregation System (Seg) or Mass Balance (MB).
- 1.2.4 An exception can be granted to Participating Operator and/or CoC Certification Body by an Assurance Service Provider after consulting and receiving approval from SRP secretariat for each exception.
- 1.2.5 SRP secretariat makes a list of existing exceptions available to all assurance providers and clients working within the standards system so that these are applied consistently.
- 1.2.6 Exceptions are only valid until the next standard review exercise; at which time they are considered as input to the review.
- 1.2.7 This Standard is effective from the date of approval as stated in this document. The Standard will be updated periodically, and updated versions will supersede previous versions on date of publication.

## 1.3. Certification Body Application Process for SRP CoC

- 1.3.1. All Certification Bodies must comply with the requirements of the SRP Assurance Scheme Annex 4 except for points 1.2; 1.4; 1.8. and 3.

## 1.4. Certification Body Participants in the Audit Process

- 1.4.1 The CB shall establish an COC certification team comprising experts in specific areas to complete the certification process and comply with all requirements in the SRP Assurance Scheme (Annex 4) in accordance with each team member's designated role(s). An individual can play more than one role. All CB personnel involved must sign a confidentiality agreement as a condition of employment.

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<sup>5</sup> [SRP Assurance Scheme version 1.3 - August 2020](#)

- 1.4.2 Certification manager: a designated CB staff member will be responsible for administration of the certification program. His/her responsibilities are to:
- a) Ensure that all CB staff meet the eligibility qualifications specified in this document and other relevant documentation.
  - b) Ensure that auditors conduct the audits in accordance with all requirements specified in this document.
  - c) Update and communicate with CB staff and certificate holders in regard to changes in the certification program.
  - d) Provide documentation and/or reports to SRP on request.
  - e) Ensure timely and adequate communications with SRP.
  - f) Inform SRP in the event of changes that may affect CB conformance with the requirements stipulated in this document, as well as cases where the CB is sanctioned by any other scheme for which the CB is approved, e.g. RA SAS CoC, FSC CoC, PEFC CoC, RSPO SCC.
- 1.4.3 A database administrator within the CB manages the account within the Certification Database and ensures proper data input. His/her responsibilities are to:
- a) Input data on certification processes for certificate holders, ensuring each step follows the certification process timeline rules.
  - b) Ensure data quality and update certificate holder information as needed. Data quality includes accurate certificate information, as well as consistency of information across the various fields and attachments in the Certification Database.
  - c) Update auditor records in the Certification Database with new training, performance evaluations and general auditor details.
  - d) Participate in Certification Database training and webinars.
  - e) Follow-up on specific data input needs or record updates in a timely manner.
- 1.4.4 The auditor team is made up of qualified and registered auditors, one of whom acts as CoC auditor, and any additional technical experts as needed. All must pass the SRP CoC training course, and be qualified as a lead CoC auditor according to a social/ environmental assurance scheme with similar CoC requirements (e.g. RA SAS CoC, FSC CoC, PEFC CoC, RSPO SCC, GLOBALG.A.P. CoC). The team's responsibilities are to:
- a) Audit according to the system requirements.
  - b) Ensure conformance with the audit report requirements of the certification process timeline.
  - c) Provide accurate information on all aspects of the audit process.
- 1.4.5 **Quality** reviewer: This is the CB staff member responsible for reviewing audit reports to ensure proper interpretation of the SRP CoC Standard (Annex 2), with the following roles:
- a) Conduct a quality review of audit reports and ensure that accurate and consistent information is reviewed in the Certification Database. For example, the quality reviewer should ensure that site(s) information are recorded accurately in the audit report and in the engagement record.
  - b) Notify the audit team of any inaccuracies in the audit report.
  - c) Propose improvements – relating to the certification process including audit quality review and auditor competence – to the certification manager .
  - d) Make the final certification decision.
  - e) Have the authority to modify the recommendation of the audit team due to any errors or inconsistencies identified in the audit report.
  - f) Recommend another audit if the report is lacking of solid evidence.



- g) Request that the CoC auditors clarify or expand any section of the audit report.
- h) Withdraw a non-conformity.
- i) Issue a new non-conformity.
- j) Review an appeal based on a certification decision.

## 2. CoC CERTIFICATION RULES

### 2.1. Chain of Custody Audit Scope

- 2.1.1 The SRP Chain of Custody requirements shall apply to any organisation in the supply chain that physically handles SRP-Verified rice products at a location under the control of the organisation, including outsourced contractors. After the end-product manufacturer, there is no further requirement for certification.
- 2.1.2 Any company, association, factory, processing unit or other entity that applies for SRP Chain of Custody certification, shall be referred to as a Participating Operator (PO).
- 2.1.3 Certification cycle of SRP Chain of Custody certification is three years.
- 2.1.4 POs are divided into two categories in the context of the SRP CoC system:
  - a) Single Participating Operator: An entity that administers only one production and/or processing facility but may administer one or more offices. The CoC certificate is issued for a single PO.
  - b) Multi-site Participating Operator: An entity that administers two or more sites.
- 2.1.5 In cases where a Participating Operator outsources activities to independent third parties, the CB shall conduct a risk assessment to determine whether an audit of the outsourced contractors is required. If the outsourced contractor holds SRP CoC certification it is categories as low risk and the outsourcing contractor audit is therefore not required.
- 2.1.6 Outsourced contractors that are not categories as in 2.1.4 shall be considered high risk if they are engaged in physically transforming products or if there is a risk of uncontrolled, non-deliberate or accidental cross-contamination resulting in mixing of verified and non-verified products. In such case the audit scope should include outsourced contractors, and a field visit to outsourced contractors must be planned.
- 2.1.7 Expansion of Multi-site Participating Operator (PO) certificate:
  - a) At any time in the audit cycle and as long as effectiveness of the audit is guaranteed, a PO may request a change to the certification scope to increase or decrease the number of sites.
  - b) For a multi-site PO to increase its number of sites, it must communicate to the CB regarding each site it wishes to include.
  - c) Any new facilities involved in manufacturing, packaging or labelling must be approved by the CB before they can be included within the scope of the certificate. This may require an on-site audit by the CB, or a desk review, depending on complexity and the risk associated with the site as a result of the PO's risk assessment.

### 2.2. Type of Audit and Frequency

- 2.2.1 The CB shall record each audit process for the different types of audits in the SRP database at the time of confirmation of the audit date as described below in 2.2.3 onwards.

- 2.2.2 An on-site audit is required for organisations involved in manufacturing, packaging or labelling SRP-Verified rice. Desk audits can be applied for traders not involved in any transformation or repackaging.
- 2.2.3 Certification audit: A certification audit is carried out when the organisation applies for SRP certification for the first time, and every three years it will be called as recertification audit.
- a) To maintain continuity, the CB must complete the recertification audit process before the certificate expires.
  - b) If the CB does not have a recertification audit process activated at the time that the certificate is due to expire, the certificate will immediately be cancelled in the SRP database.
- 2.2.4 Annual audit: The CB shall conduct an annual audit according to the assessed risk of the PO. Such audits may be either on-site or desk audits based on the outcome of the CB's risk assessment process. An on-site annual audit shall be conducted if the PO is engaged in physically transforming products or if there is a risk of uncontrolled, non-deliberate or accidental cross-contamination resulting in mixing of verified and non-verified products; a desk-based annual audit may be conducted if PO does not physically possess SRP-Verified product.
- a) Annual audits shall take place between four (4) months before and four (4) months after the anniversary date of the certificate.
  - b) Annual audits shall evaluate all applicable criteria, and corrective actions associated with any open minor non-conformities.
- 2.2.5 Verification audit: The CB shall conduct a verification audit when the organisation receives one or more major non-conformities as a result of an annual or certification audit. When a verification audit is necessary, the CBs shall adhere to the following additional conditions:
- a) For closure of all major non-conformities, the verification audit shall be completed and a final certification decision made within four (4) months of the previous certification decision.
  - b) A new report checklist shall be used by the auditor which includes only the required elements related to evaluation of all major non-conformities.
- 2.2.6 Research audits: The CB may conduct research audits in response to a complaint, includes 'incidents reported' from a buyer or third party regarding a PO with the potential to result in a major non-conformity. Research audits may be conducted at any time in the certification cycle, with the following conditions:
- a) If the complaint pertains only to the performance of the multi-site administrator regarding the multi-site standard requirements, the research audit shall apply only to that entity.
  - b) If the complaint pertains to the performance of one or more member sites regarding applicable standard requirements, the audit scope shall include only the sites relevant to the complaint or sample of sites if it is multi-site. If the complaint pertains to both the administrator and the member sites, all shall be audited.
  - c) In the checklist, the CB must include only the criteria on which the research audit is focused.
  - d) Where a research audit is required, the PO will cover the costs of this audit.

## 2.3. Conformance Evaluation

- 2.3.1 Audit findings are classified as conformities or non-conformities. Non-conformities can be categorised as major or minor.
- 2.3.2 Non-conformities may be closed by the auditor prior to report finalisation if evidence – demonstrating that the non-conformity has been corrected – is evaluated and accepted within 28 calendar days of the closing meeting. Any additional costs incurred in evaluating such evidence shall be borne by the PO.
- 2.3.3 An observation is a comment intended to highlight potential improvements to the PO's CoC system.
- 2.3.4 A major non-conformity (MaNC) is issued when there is:
- a) evidence of non-conformity that poses a material risk to certified product integrity due to mixing with uncertified product, over-selling of certified volumes, significant system gaps, or seal use violation; or
  - b) a non-conformity with the CoC Standard (refer Annex 2) that poses a substantial risk to the SRP CoC system or (at SRP's sole discretion) that may otherwise carry reputational impacts for SRP; or
  - c) escalation of a minor non-conformity that was not closed within the designated timeline.
- 2.3.5 If one or more MaNCs are issued as a result of a certification audit or recertification audit, CoC certification will not be approved, and the PO is then required to undergo a verification audit within four (4) months of the certification decision. If during this verification audit the PO demonstrates corrective actions sufficient to close the MaNCs, a certificate may be issued. Otherwise, CoC certification will not be approved.
- 2.3.6 If one or more MaNCs are issued as a result of an annual audit, CoC certification shall be suspended, and the PO must undergo a verification audit within four (4) months of the suspension decision. If, during the verification audit, the PO demonstrates corrective actions sufficient to close the MaNCs, the certificate may be reinstated. Otherwise, the certificate will be terminated.
- 2.3.7 A minor non-conformity (MiNC) is issued when there is:
- a) evidence of non-conformity that does not pose a material risk to certified product integrity due to mixing with unverified product, over-selling of certified volumes, significant system gaps, or seal use violation; or
  - b) a non-conformity with the CoC Standard (refer Annex 2) that does not pose a substantial risk to the SRP CoC system or carry reputational impacts for SRP.
- 2.3.8 Although an MiNC generally does not prevent certificate issuance or maintenance, there may be cases when a large number of MiNCsmncs indicate that the overall management system is too weak to issue or maintain the certificate. In such cases, presence of a cumulative impact of multiple MiNCs indicates risk of a general system breakdown, which constitutes a major non-conformance. In such a situation, each MiNC issued is classified as an MaNC.
- 2.3.9 If any open MiNC(s) remain following the certification or annual audits or raised in the next certification cycle, the PO should demonstrate corrective actions sufficient to resolve each MiNC within 12 months of the certification decision.
- 2.3.10 At any audit, a CB may, but is not required to, escalate an MiNC from a previous audit to an MaNC if the PO has not demonstrated corrective actions sufficient to resolve the MiNC. In addition, at a recertification audit, a CB shall escalate any open MiNC(s) to MaNC(s) if

the PO has not demonstrated corrective actions sufficient to resolve the open MiNC(s) issued during the previous certification cycle.

## 2.4. Certificate Termination and Sanction

- 2.4.1 A PO's CoC certificate shall be subject to sanctions for any of the following reasons:
- a) The PO does not undergo the corresponding audits in the certification cycle within the established timeframes, unless the CB authorises an extension based on a force majeure situation.
  - b) A PO is found to make false claims or declarations, or to deliberately provide inaccurate or materially incomplete information.
  - c) A PO deliberately obstructs or hinders an audit.
  - d) A PO has participated in fraudulent or unethical activities that may tarnish the reputation of the certification program.
  - e) A PO knowingly fails to comply with any aspect of the SRP CoC system.
  - f) A system breakdown or major/critical non-conformance that results in or will likely result in non-conformant products being sold with a SRP-Verified claim, shall result in suspension.
- 2.4.2 The PO may also request voluntary termination of its certificate from the CB, in which case the CoC certification is deemed "terminated" as of the date of the PO's written request.
- 2.4.3 Sanctions for a PO without CoC status shall include all of the applicable consequences of termination:
- a) As of the termination date, no further sale or transfer of ownership of SRP-Verified rice may be claimed or recognised as SRP-Verified. Should the PO have additional volumes of SRP-Verified rice it wishes to sell, PO shall confirm a sell-off period to GLOBALG.A.P. through the system and the volume will be verified and approved as SRP-Verified. The sell-off period will begin on the termination date and continue for up to six (6) months from the termination date.
  - b) As of the termination date, and including during the sell-off period, the PO will immediately cease to make any off-pack claims that imply that it complies with the CoC Standard and immediately cease to make use of SRP claims or trademarks in any physical or electronic promotional material or media, in brochures or on web pages, signs or other types of documentation (other than approved annual reports or sustainability reports dated prior to termination).
  - c) As of the termination date, and including during the sell-off period, a PO may not create or cause to be created any new products, packaging or off-product promotional materials marked as SRP-Verified.
  - d) Following termination, and accounting for the sell-off period, the PO shall be deactivated in all applicable SRP systems.
  - e) A PO with a certificate terminated due to fraud cannot entering the SRP COC certification system within a period of one (1) year from the date of the termination.
- 2.4.4 If a certificate is suspended by CB for more than four (4) months, it shall be terminated.

## 2.5. Certificate Reinstatement

- 2.5.1 POs whose certificate has been terminated may re-apply for certification at any time unless the termination was due to fraud, following the requirement in Section 2.4.3 e).

- 2.5.2 POs with no CoC status that have been sanctioned by SRP shall secure conformance with SRP licensing agreements and the requirements for the trademarks and traceability system prior to selling and/or promoting products as originating from SRP-Verified producers.
- 2.5.3 The certificate cycle will follow the reinstatement date.
- 2.5.4 Unless within the previously approved sell-off period, no product may be sold with SRP-verified claims before a new CoC certificate is issued or sanctions have been lifted.
- 2.5.5 To be reinstatement, a PO shall:
  - a) Submit a new application to enable the CB to determine the corresponding assurance tasks to be undertaken.
  - b) Close any existing MNCs or mncs that remained open in the 12 months prior to termination and were not closed when the previous certificate was terminated.
- 2.5.6 Certificates can be reinstated after an on-site audit resulting in a positive decision.

## 2.6. Certification Process Timeline Rules

- 2.6.1 The CB is responsible for complying with the defined timelines and for recording the process in the SRP database within the applicable timelines (see Annex 1 for details).
- 2.6.2 If certification is not granted, this timeline can be extended:
  - a) The CB has four (4) months to perform a verification audit and must announce a new certification decision within this period.
- 2.6.3 The CB has 30 business days from the date of appeal to review the appeal.

## 2.7. Multi-site Sample Planning

- 2.7.1 The CB shall audit a representative sample of the PO's member sites to evaluate the effectiveness of the multi-site administrator.
- 2.7.2 Conformance with the SRP CoC Standard according to the audit scope will be evaluated at the site level for those sites that are part of the audit sample.
- 2.7.3 The CB shall always audit at least two member sites in any type of audit.
- 2.7.4 The sites of the CoC multi-site PO to be evaluated by the audit team shall be selected in such a way that the risk categories for each site associated with the certificate are represented in the sample. When selecting sites for audit, the following factors shall be considered:
  - a) Geographic distribution
  - b) Activities and/or products produced
  - c) Size and complexity of participating sites
  - d) Areas of improvement of the internal management system identified by internal reports or external audits
  - e) New sites, products or processes
- 2.7.5 The CB shall use the following guidance to determine the sample size for each audit type. If the value of the sample size is not an integer number, the CB shall round it up to the next higher number.

Type of Audit	Sample size
Certification audit	The sample of sites to be audited shall be equal to the square root of the total number of sites in the certificate.
Annual audit	The sample of sites to be audited shall be equal to the square root of the total number of sites in the certificate.

Verification audit	The verification audit checks whether the audited organisation has satisfactorily addressed the non-conformities detected during a previous audit. Verification audits shall apply only to those sites that did not meet the certification requirements. A verification audit could also be used to add new, potentially high risk, sites to the scope.
Research audit	A research audit is triggered in response to a claim or complaint about the performance of a PO. Research audits shall apply only to those sites relevant to the complaint.

## 2.8. CB Permitted Support

- 2.8.1 The actions described in this section are permitted by SRP but are not required. CBs shall consult SRP if they have any questions or need more information about technical support during or related to certification processes. CBs shall also consult GLOBALG.A.P. as the Assurance Service Provider if they have any questions or need more information about potential conflicts.
- 2.8.2 The CB may support the PO by doing following:
- a) Describe examples of conformance with standard criteria.
  - b) Inform the PO of the option to hire a consultant or organisation to help the PO prepare for the audit and certification process.
  - c) Provide sample documentation or other supporting materials to the PO that show how a fictional company has met CoC requirements.
  - d) Describe a non-conformity during the closing meeting and in the audit report in such a way that the non-conformance and its root cause are clear, so that the operation knows exactly what it needs to correct.
  - e) Provide general training about the CoC Standard and the requirements applicable to different types of operations, including Standard interpretation by auditors for these types of operations. This training cannot be one-to-one or provided specifically to one PO.

## 2.9. CB Support not Permitted

- 2.9.1 Recommend specific actions or products facilitating PO conformance with the applicable CoC Standard, including providing corrective actions or designs for operation-specific infrastructure; or write or participate in writing required plans, policies or procedures.
- 2.9.2 Give advice or directions, prescribe practices, or provide instructions to close non-conformities. CBs may, however, explain in detail the reasons for raising the non-conformities.
- 2.9.3 Provide support or consulting services that could affect the CB's impartiality in assigning non-conformities, evaluating corrective actions and making certification decisions.
- 2.9.4 Combine or package offers or quotes for technical support with certification services.
- 2.9.5 Mix support and certification activities in any way that violates any of the requirements stipulated in the SRP Assurance Scheme.

## 2.10. CoC CERTIFICATION PROCESS

### 2.11. Application Process

- 3.1.1 SRP CoC certification begins when a PO submits an application form to the CB, which then determines auditing needs (type, budget and duration).
- 3.1.2 The CB shall send an introductory information package that includes the SRP CoC Standard, Policy and application form, together with the applicable procedures.
- 3.1.3 The CB shall review the application within ten (10) business days of receipt, to ensure the following are in line with the CB's understanding of the PO:
  - a) All sites handling/ purchasing/ trading SRP-Verified rice have been included;
  - b) The company's operation and activities are accurately described.
- 3.1.4 The CB shall ensure that the PO's information recorded in the SRP database and updated based on any changes to the PO's information or certification scope.
- 3.1.5 If it is a multi-site, a member list must be uploaded at the time of report finalisation each year, when changes occur.

### 2.12. Audit Plan Development

- 3.2.1 CBs shall provide the PO with an audit plan at least five (5) days in advance of the on-site or desk audit, with the exception of research audits. The objective of the audit plan is to describe all activities covered by the audit process, including the following:
  - a) Composition of the audit team, indicating names and roles of the auditors and experts who will participate in the audit.
  - b) Date(s) of the audit, and time required to perform the audit.
  - c) Any PO information that affects the audit process:
    - i. Single or Multi-site: Number of sites
    - ii. Product information and related processes
  - d) Documents and records to be available for the audit process.
  - e) Agenda for the audit.
- 3.2.2 Factors to consider when planning audits:
  - a) To prepare for the audit the CB shall review the following factors, to be evaluated and recorded, including but not limited to:
    - i. Geographic location of the operation – address, state/ region, country;
    - ii. Type of operation;
    - iii. Number of sites;
    - iv. Valid certifications under other schemes;
    - v. For operations already certified, the performance history of the operation regarding conformance with the SRP CoC Standard.
  - b) For research audits, CBs shall base their audit preparation and review on existing information about the operation to be investigated, which should include the above-mentioned factors. CBs shall also consider:
    - i. The nature and seriousness of the complaint or incident reported or detected;
    - ii. The evidence presented and compiled to date.

## 2.13. Audit Execution

- 3.3.1 **Preliminary review of documentation:** CBs shall provide its audit team with access to all the necessary information to conduct the audit and to allow their thorough review before initiating the audit this may include information from other sources or stakeholders.
- 3.3.2 **Opening meeting:** The audit team shall initiate each on-site audit with an opening meeting led by the CoC auditor in the presence of representatives of the audited PO and all audit team members assigned to audit the site at which the main opening meeting occurs.. The audit team shall record the names of all opening meeting participants, agreements reached and any objections or concerns raised by the operation's representatives.
- 3.3.3 **Evidence of conformance:** The CB shall provide clear and concise evidence to document conformance and non-conformance during the audit. The audit team shall verify findings between different types of evidence to triangulate evidence among document reviews, interviews, and field observations of operations. The audit team shall record such information as the primary purpose of recording triangulated information is to verify findings associated with the evaluation itself – including any NCs, secondary purpose is use as a basis to expand the audit scope or the collection of additional evidence.
- 3.3.4 Individual auditors shall keep notes of evidence for the CoC Standard criteria for which they are responsible. The audit team can complete an audit checklist provided by the CB with a summary of the consolidated evidence from all team members for each CoC Standard criterion. The summary should clearly describe the reasons why the operation is or is not in conformance with CoC Standard criteria, and the extent or magnitude of any non-conformance (MNC or mnc).
- 3.3.5 The audit team shall record all non-conformities and consolidated evidence in the audit report to ensure that all CoC Standard criteria are audited and to facilitate the recounting of evidence during the closing meeting.
- 3.3.6 Following the audit, the CoC auditor conducts a closing meeting with the operator representative(s). The audit team members participate according to the instructions of the CoC auditor. The following functions and activities must be completed during the closing meeting:
- a) Summarise the main findings and conclusions of the audit so that they are clearly understood by the representative(s) of the operation, especially the nature, extent and magnitude of any non-conformities detected;
  - b) Explain the timeline and remaining steps of the certification process, emphasising that the audit team does not make the certification decision;
  - c) The auditor shall clearly explain each non-conformity, and the reasons for raising the non-conformities and their designation as major or minor;
  - d) The auditors must allow the representatives of the operation to question findings and submit evidence that could lead to modifications of conformity decisions within the time limits established by the CB;
  - e) Allow questions from the operation regarding potential improvements and corrective actions;
  - f) Obtain documentation related to conformance with the CoC Standard and verify any remaining information about the operation;
  - g) Reiterate the commitment to confidentiality and limitations on the use of the information obtained.



- 3.3.7 The CoC auditor shall submit the completed checklists, verified information, and all other materials describing or containing conformance evidence to the CB for review. The CB shall maintain copies of this evidence in their files.

## 2.14. Audit Report and Review

- 3.4.1 CBs shall adhere to the timelines stipulated in Annex 1 relating to report review and finalisation.
- 3.4.2 Following completion of the review process as described in Annex 1, the CB shall take the certification decision and registers the decision in the SRP database.
- 3.4.3 SRP may stipulate shorter timelines in cases of research audits for high-risk cases. SRP shall communicate – during the audit planning process – such timelines to the CB conducting the research audit.
- 3.4.4 For multi-site PO certificates, the CoC auditor is responsible for completing all required information in the checklist with verified sample details describing corresponding findings and evidence for each member site and at the multi-site administrator level.
- 3.4.5 For verification audits, the authors must reference the original audit report, complete the full review of non-conformance criteria and indicate the additional information and date of the verification audit. For new audit samples during the verification audit process, the CoC auditor should complete evidence and findings for all CoC criteria.
- 3.4.6 The CoC auditor shall send the CB the audit report, list of updated member sites (where applicable) and evidence obtained during the audit.

## 2.15. Certification Decision

- 3.5.1 The CBs shall conduct a documented review of the quality of all draft audit reports and evidence, to be carried out by an internal quality reviewer assigned by the CB.
- 3.5.2 The quality reviewer shall consider the following elements according to the requirements of the SRP CoC Standard:
- a) Correct interpretation of the SRP CoC Standard criteria in the context of the applicable audit scope;
  - b) Correct assignment of non-conformities to the relevant SRP CoC Standard criteria;
  - c) Verify that the evidence for all criteria and all non-conformities is described in a manner that is clear, concise, objective and expresses the nature, magnitude and correct technical basis of the Standard non-conformities;
  - d) Verify that the report conclusions are consistent with the non-conformities reported;
  - e) Correct spelling and grammar without excessive use of jargon or colloquialisms;
  - f) Conformance with submission timelines established in this document.
- 3.5.3 The quality reviewer shall document recommended changes and any comments, observations and suggestions for improvement and return them to the CoC auditor.
- 3.5.4 The reviewer shall evaluate the quality of the report and keep a record for each audit report including aspects to be improved, which will be used by the CB and SRP for evaluating auditor performance.
- 3.5.5 CBs shall maintain copies of the original draft audit report and the quality reviewer's report and incorporate them into quality assurance reviews as indicated in the quality management systems of the CB.

- 3.5.6 The CoC auditor shall modify audit reports based on the recommended changes, comments, observations and suggestions for improvement made by the quality reviewer. Any conflicts between the audit team's or CoC auditor's findings and the recommended changes must be documented and incorporated in the CB's quality management system for subsequent review.

## 2.16. Client Review and Appeals

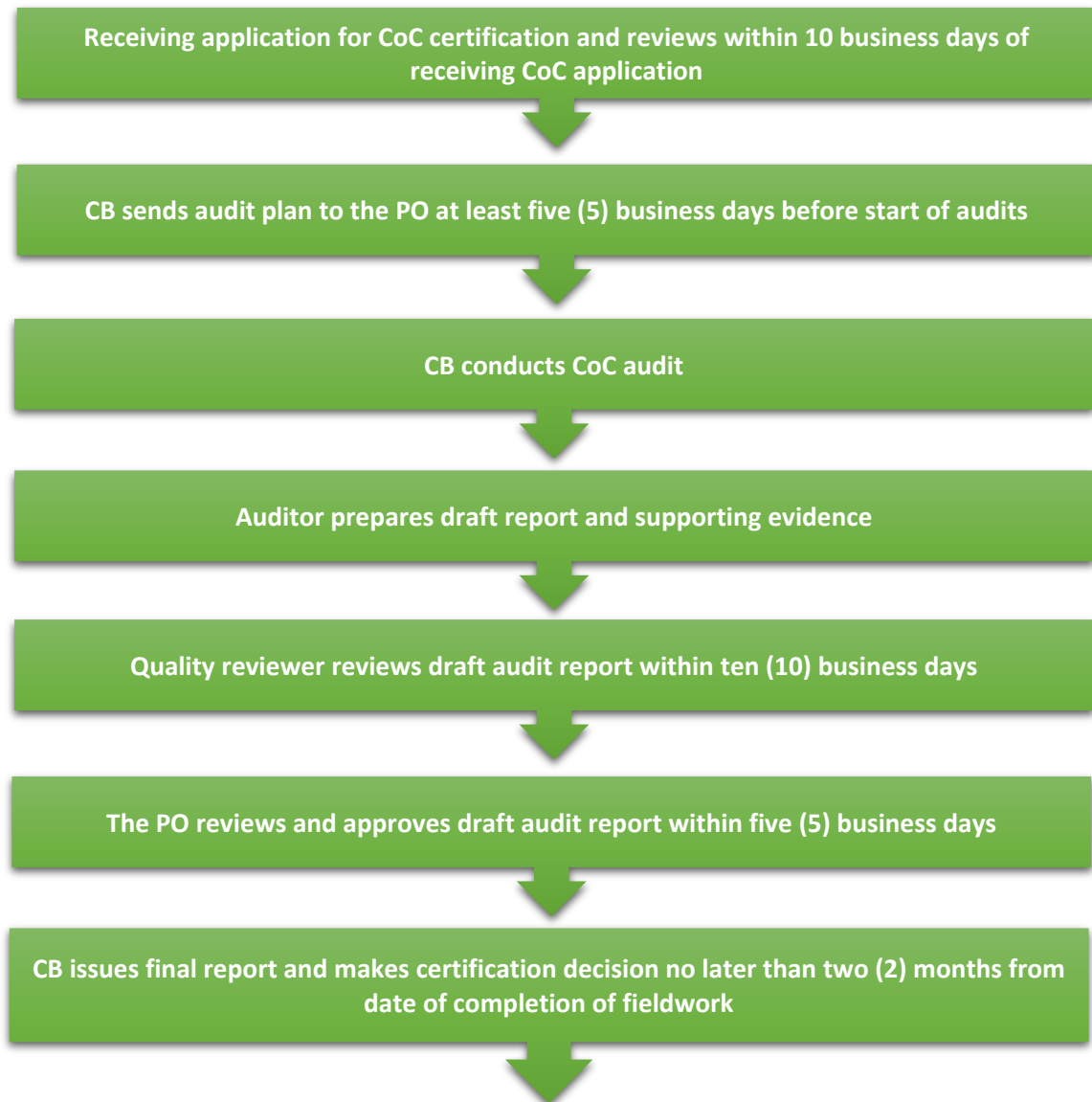
- 3.6.1 PDF versions of audit reports shall be generated after the quality review process and sent to audited operations for their review and comment. The following responsibilities and rights govern these processes:
- a) The CB shall establish a process that documents and responds to POs' comments about, or conflicts with, audit reports submitted for their review;
  - b) The audited PO shall review the recorded information relating to their operations and notify the CB of any discrepancies or inaccuracies;
  - c) Audited PO shall report to the CB any discrepancies or conflicts with respect to non-conformities reported in the closing meeting and those described in the audit report. POs have the right to challenge any new or modified conformance issues recommended by report reviewers or review committees, and to provide evidence to support their claims;
  - d) The CB shall receive and process any comment, complaint or conflict related to audit reports according to their documented processes.
- 3.6.2 CBs can consider the audit reports as accepted if no comments or concerns are received from the PO within ten (10) business days of the audit. Should the PO reject any decisions arising from the content of the report despite clear technical justifications by the CB, the CB shall proceed with the certification decision, send the final report to the audited PO, and upload it to the Certification Database.
- 3.6.3 The audited operation has the right to appeal the certification decision according to the SRP CoC Certification Policy and procedures established by the CB. The CB must adhere to the following requirements and timeframe for the appeals procedure:
- a) The appeal shall be analysed by an individual who did not participate in the audit or in the decision-making process related to the certification, who does not have any conflicts of interest related to the operation, and who is qualified as a CoC auditor;
  - b) The CB shall not resolve appeals by changing the certificate scope to eliminate a problem in the scope of the certification granted;
  - c) The CB shall resolve and communicate the result of any appeal within thirty (30) business days;
  - d) The CB shall describe in its appeal procedure any associated fees;
  - e) The CB shall maintain records of appeal processes including dates that appeals are received, decided, and communicated to audited PO, as well as the nature of the appeal and decisions reached. These records shall be made available to SRP upon request;
  - f) Only in the case where the audited PO is not satisfied with the result of the appeals process, the CB shall communicate that the PO may appeal to ASP within five (5) business days of the original appeal decision. The SRP appeals process will adhere to the same scope and requirements as described in this section. All decisions by SRP are final;

- g) The CB shall inform the PO of the result of its appeal. If the appeal is accepted, the CB shall modify the original audit report to reflect the new certification decision and upload the new report into the SRP database. If the appeal is rejected, the original decision prior to appeal shall be retained.

## 2.17. Issuing the Certificate

- 3.7.1 The CB shall issue a certificate only after the PO has successfully passed a certification audit, or successfully passed a verification audit after failing a certification audit. The CB shall also issue an updated certificate for:
  - a) PO that have undergone additional audits that necessitate changes in the certificate;
  - b) PO that have changed their legal or commercial name.
- 3.7.2 All certificates have a validity of 36 months from the date of the certification decision. When PO undergo verification audits after their first certification audit, the certification decision date corresponds to the decision date for the verification audit.
- 3.7.3 The status of the certification is subject to the results of subsequent audits and the PO's conformance with the SRP Rules and related requirements.
- 3.7.4 The certificates issued by CBs shall include the following:
  - a) The legal name and, if necessary, the trade name of the certified organisation;
  - b) The location of the certified PO;
  - c) A statement of conformity and the names of the applicable SRP Standard on which the audit was based;
  - d) The effective date of the certification and its expiry date;
  - e) List of sites included in the certificate scope, with company type;
  - f) Type of product sold;
  - g) The unique certificate code number generated by the SRP database, which corresponds to each successful certification audit.

## Annex 1: Certification Process Timeline Rules



## Annex 2: Sustainable Rice Platform (SRP) CoC Standard

1. General CoC requirements		
Criterion 1.1 The Participating Operator must implement the Chain of Custody requirements within the scope identified.		
Indicator		Guidance
1.1.1	The Participating Operator must identify the scope of the Chain of Custody system.	
1.1.2	The Participating Operator must define the unit of certification including, in the case of multi-site operators, number of sites and the type(s) of operations covered by the scope of their SRP CoC. When applying the Mass Balance system, a Participating Operator must implement – at the level of a single site – the mass balance requirements set out in Annex 3. Whenever more than one legal entity operates on a site, each legal entity is required to operate its own mass balance.	
1.1.3	The Participating Operator must ensure that independent third parties handling SRP products (e.g. subcontracts for storage, transport, etc.) are in conformance with the CoC Standard requirements.	
1.1.4	The Participating Operator must have an agreement with its sites requiring appropriate reporting and communication.	
1.1.5	The Participating Operator shall define and document the claim category/ies that will be tracked within the CoC control system.	
Criterion 1.2 The Participating Operator has a system in place to implement CoC requirements.		
Indicator		Guidance
1.2.1	The Participating Operator shall identify one person with overall responsibility for the CoC control system, and individual persons responsible for each part of the CoC control system – including but not limited to purchasing and receiving, processing, storage and shipping, marking, delivery and sales, and record-keeping.	
1.2.2	The Participating Operator shall develop and maintain documented procedures to ensure conformance with all applicable CoC requirements. The procedures must be according to the scale and complexity of the PO, covering all sites included in the scope.	
1.2.3	The Participating Operator must retain and report information related to implementation of the SRP CoC standard, including procurement and sales documents, production records and volume summaries for at least <b>three (3)</b> years.	
1.2.4	The Participating Operator must undertake an annual internal review of performance, including the effectiveness of quality management systems and the conformance of the sites with the requirements of the SRP CoC standard. In case of non-	

	conformities, the Participating Operator must take appropriate corrective actions.	
1.2.5	All workers involved in the implementation of this CoC Standard shall be aware of and have sufficient knowledge of the SRP CoC requirements based on participation in relevant training.	
1.2.6	The Participating Operator shall maintain data on the quantity of tracked products and ensure that the data are made available to the CB. At minimum, the quantitative information that shall be maintained relating to each reporting period is as follows: <ul style="list-style-type: none"> <li>• purchased SRP-Verified rice</li> <li>• SRP-Verified rice used in processing</li> <li>• waste produced during processing</li> <li>• sold SRP-Verified rice</li> <li>• input and final SRP-Verified rice held in stock.</li> </ul>	

## 2. Chain of Custody Models

Criterion 2.1 The Participating Operator must define the CoC Model used and develop a system to support the selected CoC model.

	Indicator	Guidance
2.1.1	A Participating Operator applying the Identity Preservation (IP) CoC model shall demonstrate segregation starting from the level of producer or producer group up to point of sale.	
2.1.2	A Participating Operator applying the Segregation System CoC model shall demonstrate segregation of SRP-Verified rice from any non-verified rice stored at or passing through its operational sites.	
2.1.3	A Participating Operator applying the Mass Balance CoC model shall demonstrate the system is in place and in conformance with the Mass Balance requirements set out in Annex 3.	
2.1.4	The Participating Operator shall track and segregate SRP-Verified rice with separate claim categories throughout all processes, including purchasing and receiving, processing, storage and shipping, marking, delivery and sales, and record-keeping.	

## 3. Data Validation

Criterion 3.1 The Participating Operator must validate the SRP documentation.

	Indicator	Guidance
3.1.1	The Participating Operator must check the supplier contract, invoice and supporting documentation to ensure the supplied SRP-Verified rice comes from SRP-verified suppliers, matches the accompanying documentation.	
3.1.2	For each purchase/ receipt of SRP-Verified rice tracked within the CoC control system, the Participating Operator shall identify, validate and record at least the following information: <ul style="list-style-type: none"> <li>• identification of supplier(s)</li> </ul>	

	<ul style="list-style-type: none"> <li>• identification of SRP-Verified claim</li> <li>• quantity of delivery</li> <li>• date of delivery</li> <li>• claim category</li> <li>• the supplier’s SRP Verification Code<sup>6</sup>, as applicable.</li> </ul>	
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4. Data Reconciliation		
Criterion 4.1 The Participating Operator must record and manage the SRP documentation.		
	Indicator	Guidance
4.1.1	Invoice and/or supporting documentation of incoming SRP-Verified rice must be received and entered into the system within <b>28 calendar</b> days of physical delivery.	
4.1.2	Where applicable, the Participating Operator must use documented conversion rates to calculate the equivalent output weight or volume associated with the received SRP consignment.	
4.1.3	The Participating Operator must maintain the accuracy of any measuring equipment used.	<i>Verification and calibration of the equipment. This should be done at a certain frequency (for example every 6 months)</i>
4.1.4	The volume of SRP-Verified rice received and the associated sustainability characteristics must be recorded in the system, within 28 calendar days of entering the system, after validity has been confirmed (indicator 2.1.1)	
4.1.5	Allocation of SRP data must be only to products which are fungible with rice products.	
4.1.6	The Participating Operator must undertake inventories of the input/ output balance of SRP-Verified rice at fixed regular intervals, for each operational site, not exceeding 28 calendar days.	
4.1.7	The volume of SRP-Verified rice received shall be greater or equal to the volume or quantity of SRP-Verified rice supplied to clients over a fixed inventory period of maximum 28 calendar days.	
4.1.8	Where the balance of inputs and outputs is positive at the end of the economic operator’s inventory period, sustainability data may be carried into the next inventory period.	
4.1.9	Sustainability data expires three (3) years from the date of entry into the system or when certification of the economic operator ceases, whichever occurs sooner.	

<sup>6</sup> SRP Global Number from SRP database.

5. Processing		
Criterion 5.1 The Participating Operator shall implement the CoC system within its processing activities.		
	Indicator	Guidance
5.1.1	The Participating Operator shall use a tracking system or production records to document the processing of product for each claim category.	
5.1.2	The Participating Operator shall ensure that any off-site processing or handling that takes place at a contracted facility follows the same CoC procedures as implemented by the Participating Operator and is covered by a signed outsourcing agreement (described in 1.1.4), requiring conformance with the applicable requirements of this Standard.	
5.1.3	All product that cannot be identified as belonging to one of the claim categories defined in 2.1 above, shall be kept separate from all other products until documented evidence of the claim category is obtained.	

6. Shipping and sales		
Criterion 6.1 The Participating Operator shall ensure the SRP-Verified rice is sold with correct information in the sales documents.		
	Indicator	Guidance
6.1.1	The Participating Operator shall ensure correct claim information is provided on sales invoices and shipping documents, including the following: <ul style="list-style-type: none"> <li>• Description of the product and the claim category</li> <li>• Quantity of each product/ claim category</li> <li>• SRP Verification Code, if applicable.</li> </ul>	

7. Claims and public information		
Criterion 7.1 The Participating Operator shall ensure the SRP-Verified rice is sold with correct claims.		
	Indicator	Guidance
7.1.1	The Participating Operator shall sign a license agreement directly with SRP prior to using any SRP claims or logos.	
7.1.2	All claims and references to SRP made by the Participating Operator shall be in conformance with SRP Trademark Rules, as applicable.	
7.1.3	The Participating Operator shall submit all draft claims and proposed on-product Label use to SRP/CB/GLOBALG.A.P. for review and approval prior to use.	



## Annex 3: Mass Balance Requirements

Participating Operators applying Mass Balance as the CoC model shall demonstrate the system is in conformance with the SRP Assurance Scheme. The following additional requirements also apply:

<b>1. Traceability</b>
1.1 All sales and shipment transactions of mass balance materials or products claimed as SRP-Verified rice must be reported through the SRP database. As a minimum, all sales conducted during a calendar quarter must be registered within 28 calendar days of the end of the respective quarter.
1.2 Mass balance credits are valid for a maximum of three years. If sales exceed purchases, these must be covered with sufficient purchases of certified inputs by the end of the quarter to make Transaction for that quarter.
1.3 When using mass balance, transaction for purchases of the SRP rice should reflect the content recipe of the packaging. For example, if the SRP rice is 30 percent, the transaction document should be purchased for this rice in the same proportion.
<b>2. Double Counting for Multi-Certified Materials</b>
2.1 If a batch of SRP rice is purchased from a farm that has more than one certification scheme (e.g. Organic), then the equivalent volume of material can be sold forward with both certifications attached to the batch. However, the two certifications may not be separated and applied to two separate batches of material, each equivalent in volume to the original purchase, as this would be considered double counting. Volumes entered in SRP Database as SRP and sold under an alternative scheme must be recorded in SRP Database "Sold as non-SRP."
<b>3. Conversion Ratio</b>
3.1 If a PO wishes to convert mass balance credits to allow them to be used for further processed materials then they must demonstrate the conversion ratios. It is not possible for credits to be converted backwards or in any other manner inconsistent with actual processing conversions.
<b>4. Time-Bound Plan</b>
4.1 The PO should develop a time-bound plan to demonstrate commitment to increasing the percentage of SRP-Verified procurement as a proportion of the claimant's total annual procurement, and eventually transition from the mass balance model to IP or Segregation System. The time-bound plan should be available during the CoC audit as part of the CoC evidence.
<b>5. Communication and Claims</b>
5.1 POs implementing the Mass Balance system are not permitted to use on-pack SRP-Verified Label.
5.2 On-pack claims should comply with SRP Member Communication and Claim/Logo/Label Guidelines as set out in Annex 7 of the SRP Assurance Scheme v 1.3 and the SRP Brand Manual 2020 (both available at <a href="http://www.sustainable-rice.org">www.sustainable-rice.org</a> ).