

Certification body:	BUREAU VERITAS CÔTE D'IVOIRE	Date	For RA use only
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		approved:	

(Risk = risks to non-compliance)

Compliance topic	Related standard requirement	Risks related to specific...					What are the root causes	Why is this risk so important?	Interpretation challenges	Auditing technique to detect & reduce risks	
		Crop(s)	Region(s)	Laws	Severity	Likelihood					
Management capacity	1.1.1	Cocoa, coffee, Banana, mangoes, pineapple	All growing area			Significant	Likely	- Each member is not aware of the importance of his task - The leaders of the group are not always interested in sustainability program - The low level of the group responsible for the statement - Service providers are recruited without a selection and evaluation mechanism	Negative impact on standard implementation Incomplete actions	Criteria to define the competence are unclear All documents are in place but the system don't run	- RA provided a Management Capacity Assessment Tool - Check the list of personnel responsible for the implementation of the Management System - Check the financial administrator on the recruitment method of service
Services providers	1.2.2	Cocoa, coffee, Banana, mangoes, pineapple	All regions			Moderate	Possible	- Internal inspections were not carried out completely; - Internal inspection reports are not filled in correctly; - Group administrator is not competent; - Insufficient work equipment (GPS; rolling stock) - The register may contain fictitious members - The registry can contain members who are registered with several certified groups	The service provider can provide services without meeting the requirements of the standard	The specifications of the service providers are not clear	- Interview with the group administrator on the recruitment method of service
Group member registry	1.2.4	Cocoa, coffee	Cocoa and coffee growing area	Acte uniforme OHADA du 15 décembre 2010 - Droit des sociétés coopératives		Significant	Very Likely	- Internal inspections were not carried out completely; - Internal inspection reports are not filled in correctly; - Group administrator is not competent; - Insufficient work equipment (GPS; rolling stock) - The register may contain fictitious members - The registry can contain members who are registered with several certified groups	(Traceability problem) Possible mixture of cocoa; impossible to control production potential; possibility of situation of the plantation in a protected area (HVC destruction)	- The sometimes high number of producer files put in place; - Unavailability of GPS; Law respecting unclarified register - The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups - The declaration of areas during audits and almost always different from the areas in the registers. "	- RA provided Guidance Document C - Checks of internal inspection sheets, verifications of the membership register, cocoa delivery; interview with some producers; internal inspectors, the storekeeper or purchasing manager, - Delimitation of plots
Correct Geolocation data and farms polygons	1.1.11 & 1.2.12 & 1.2.13	Cocoa, coffee	Cocoa and coffee growing area			Severe	Very Likely	The CH's don't know how to use technology, how to use application for checking	Makes it difficult to confirm that there is no certified culture in protected area. And to get the actual farm size.	- The sometimes high number of producer files put in place; - Unavailability of GPS; - The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups - The declaration of areas during audits and almost always different from the areas in the registers. "	- Previous analysis of GPS coordinates and different images sources. - Equip auditors for a determinate number of GPS coordinates and farms size - RA provided Guidance Document F
Risk assessment	1.3.1 & 1.3.2	Cocoa, coffee, Banana, mangoes, pineapple	All growing area	- Loi N° 2023-900 DU 23 novembre 2023 portant code de l'environnement		Significant	Likely	- The unqualified risk assessor; - the evaluation is non-participatory; - All the steps of the risk assessment were not followed - the high cost of an ESSA - Falsification of the risk assessment report	- Possibility of non-compliance with the requirements of the standard - Possibility of destruction of natural ecosystems and HCVs; - Failure to respect the rights of neighboring populations; - Conflicts with local populations	- Knowledge of the realities of the certified group's business area - Knowledge of and access to all national legislation; - Difference between the criteria of the standard and the requirements of the legislation; measures to mitigate negative impacts.	- RA provided Annex 3 and Guidance Document B - Know the realities of the certified group's business area - Verification of the competence of the evaluators; - Interviews with the participants of the evaluation; - Examination of minutes and attendance lists.
Quality of internal inspection	1.4.2	Cocoa, coffee	Cocoa and coffee growing area			Significant	Very Likely	- Lack of money to equip and pay internal inspectors - Internal inspectors have others occupations than the group activities - difficulties to find qualified persons in villages	- Insufficient monitoring of farmers. - Incomplete understanding of the requirement by the member	- The groups do not have the same farmers spatial distribution - what are minimum qualifications and competencies for internal inspectors?	- RA fixed a ratio between internal inspections and farms - Check if internal inspectors can read and write - Check if they went to school - Confirm with farmers if inspectors really conduct activities and give information concerning the standard
A grievance mechanism (non-communication and non-appropriation of complaint mechanisms)	1.5.1	Cocoa, coffee, Banana, mangoes, pineapple	All growing area	- Loi N°2015-532 du 14 Septembre 2015 portant CODE DU TRAVAIL		Moderate	Possible	- Familiarity between group and community - fear of reprisals from other members of The community or group - Lack of real complaints and grievances mechanism - Lack of communication of The mechanism - ignorance of The importance of The mechanism by workers or communities. - Ignorance of rights	- Abuse - favoritism - ineffective treatment of concerns and / or disputes within the group	- How to manage a problem that needed to be treated by the complaint protocole according the auditor but not been? - How to decide that a problem was well treated?	- Interview techniques to detect problems that merit complaint handling - RA developed annexe 4
Gender equality	1.6.1	Cocoa, coffee, Banana, mangoes, pineapple	All growing area			Severe	Very Likely	- Women are just considered in food crops. - Some persons don't know that gender concern men also	- Women are less trained - less monitored - no improvement in women income. - Sometimes men are forgot in activities to promote gender equality	- The standard do not specify clear action to promote gender equality. - What can be considered as sufficient for gender equality promotion?	- RA provided guidance document G - Check by interviews and documented proofs what was done for men and women according to their needs
Mixing of certify and non certify product	2.1	Cocoa, coffee	growing area	- Décret N°2012-1008 du 17 Octobre 2012 fixant les modalités de commercialisation du café et du cacao. - Ordonnance n° 2011-481 du 28 décembre 2011 fixant les règles relatives à la Commercialisation du Café et du Cacao et à la Régulation de la Filière Café-Cacao		Significant	Likely	- Insufficiency of the traceability system set up to manage the flow of certified product - Insufficient training of actors for the registration of the flow of certified product. - Fraud - The hunt for the premium of certain wormy actors - The lack of rigor or the tolerance of the auditors in the control of the traceability of the certified product. - Overestimation of yields - Non-existence of members - Inaccurate value of areas - Double registration of plots - Parallel sale - Risk of sale of non-certified product - Non-cooperation of state bodies	- Integrity of certify product - To prevent the product sold from being superior to the product harvested and to avoid all kinds of risks of mixing. - Attention of the media and denunciation of the media on fraudulent acts in the traceability process	- Lack of credibility of acreage data and estimation of farm yields - the non-conservation of traceability documents by producers and their ease of forgetting sales information - Inability to use information from the traceability system in certification and the national system (SYDORE).	- RA provided guidance document H - Interviews with producers and actors of the traceability system - Visits to farms - Analysis of the traceability system put in place (traceability manual and documents relating to traceability, Register) - Average yields - Mapping - Previous deliveries, - Precipitation history and forecast
Equipment used to define the weight	2.1.9	Cocoa, coffee	growing area	Décret N°2019-327 du 10 avril 2019 portant approbation de la délégation de service public de service de métrologie légale portant sur les vérifications primitives et périodiques d'appareils et instruments de mesure		Severe	Very Likely	A national law designated only one structure for calibration of equipment used to define the weight. This structure don't take annually calibration as strict requirement	Large differences in weight between producers, cooperatives and exporters can result from this lack of calibration. The producer will always be the loser	Compliance with RA standard or national law?	- Check weigh difference if it is significant - Check if the group tests its scales itself at regular intervals - Give a non compliance if the farmer is the loser
Living income	3.1.2	Cocoa, coffee, Banana, mangoes, pineapple	All growing area			Severe	Likely	- Living income is not define in the contry - Living income is not well known by actors	without reference, groups will not know how to approach this requirement		- RA developed the annex 5 - Knowledge of living income for each contry

Sustainability Differential	3.2.1	All crops	All growing area	-Décret n° 2017-321 du 24 mai 2017 relatif à la mise en œuvre des projets de certification et de programme de durabilité dans la filière café-cacao. - Courrier N°CCC/00993-22/DG-KBY/DDA-KKJ/DANC-IFA/ML/AS/It	Moderate	Possible	- Fraud	- Producers work hard to be certified but do not receive their Sustainability Differential - No improvement in the living conditions of farmers	- Most producers do not know the certified quantities sold - It is difficult to reconcile the amounts received because the Sustainability Differential is sometimes paid quarterly - Sometimes during audits Sustainability Differential are not yet been paid	Possibility to fix a rate to confirm interview from producer in term of percentage that lead to non conformity
Selection of plant varieties for planting, grafting and renovation	4.1.1	Cocoa	growing area	Communication du conseil café-cacao	Severe	Very Likely	These actions are prohibited by the national management office to avoid overproduction	Most of Farms are less productive and cocoa trees are old	How to evaluate control points concerning farm management (pruning, renovation, weeding etc.)	
Privileged Use of inorganic fertilizers	4.4.4	Cocoa, coffee, Banana, mangoes, pineapple	All growing area		Severe	Very Likely	- More availability compared to organic fertilizer - Easy use compared to organic fertilizer	- soils have no good structure - Inorganic fertilizers are washed out in water bodies		
Prohibited agrochemicals	4.6.1	Cocoa, coffee, Banana, mangoes, pineapple	All growing area		Moderate	Possible	- Prohibited pesticides are cheaper and accessible on the markets - The low price of pesticides sold in the villages by itinerant and illegal traders; - Producers are not trained on good agricultural practices; or are not aware of the danger associated with the use of its products. - Fraud. - The real products used in secret by the producers do not appear on the list of products used by the group. - The insufficient number of applicators.	- The producers themselves have to spray their plantations without the knowledge of the group's leaders; - Environmental contamination and human health problem. - Possibility of contamination of the bean (LMR). - The interviewed farmer is neither able to give the real names of the pesticides used, nor to explain the procedure for using these products.	- The interviewed farmer is neither able to give the real names of the pesticides used, nor to explain the procedure for using these products. - The real products used in secret by the producers do not appear on the list of products used by the group,	- RA provided Annex 7 - Analysis of the application register of applicators from the previous year; - Interview with laborers, family members, neighbors
Functional personal protective equipment (PPE)	4.6.3	Cocoa, coffee, Banana, mangoes, pineapple	All growing area		Severe	Likely	- Applicators use safety masks which are not functional due to overuse - Producers apply The plantations without The Knowledge of The personnel responsible for The operations and do not use PPE - Damaged PPE is not replaced	Agrochemicals are dangerous for the health of the population and the environment	Producers apply themselves without the knowledge of the SGI without adequate PPE	- Check the application dates for agrochemicals, the state and the place of conservation - Interview applicators on the use of PPE - Interview the applicators on the knowledge of the measures to be taken in the event of application of the products on the list of restrictive substances - Check the preventive measures of the population in case of application of the products
Bathing facilities to all handlers of pesticides or other toxic substances	4.6.4	cocoa, coffee	All growing area		Severe	Likely	The PPE is washed and kept at the home of the applicator	Possible contamination at home by agrochemicals	The washing areas on the farm are not available during audits outside of application periods, because destroyed or stolen after application.	- Ask The applicator about The PPE washing place after application - Check where The PPE is stored - Interview family members to find out who washes and where PPE is washed - Check The nature and state of cleanliness of The PPE
Arrangements of empty pesticides and Prohibited, obsolete and expired pesticides	4.6.9	cocoa, coffee	All growing area		Moderate	Possible	Non-functional elimination system of empty pesticides and Prohibited, obsolete and expired pesticides	Non authorized persons (children) handle these bottles		
Maximum residue levels (MRLs)	4.7.2	Cocoa, coffee, Banana, mangoes, pineapple	growing area		Moderate	Possible	Tools for MLR measurements are not available for groups.	Lot of Farmers use pesticides and do not have checking tool of MRL and crops are for eating		
No worst forms of child labor	5.1	Cocoa, coffee	Cocoa, coffee growing area	- Convention sur l'âge minimum, 1973 (No 138), la Convention sur les pires formes de travail des enfants, 1999 (No 182), - Loi N°2015-532 du 14 Septembre 2015 portant CODE DU TRAVAIL - Loi N°2010-272 du 30 septembre 2010 portant interdiction de la traite et des pires formes de travail des enfants en Côte d'Ivoire - Décret N° 2014-290 du 21 Mai 2014 portant modalités d'application de la loi N°2010-272 du 30 septembre 2010 portant interdiction de la traite et des pires formes de travail des enfants - Décret 2250 portant sur la liste des travaux dangereux - ARRETE N° 009MEMEASS/CAB du 19 janvier 2012 révisant l'arrêté n°2250 du 14 mars 2005 portant détermination de la liste des travaux dangereux interdits aux enfants de moins de dix huit ans. - Arrêté N° 2017-016 MEPS/CAB DU 02 JUIL 2017 déterminant la	Significant	Likely	- Lack of workers. Need to reduce production costs - Easy labor - Absence / Distance from school - Parents' refusal to send the child to school because of field work - Poverty	- Failure to respect children's fundamental rights (education, health, safety, etc.) - Results of research on child labor in the cocoa sector: according to Tulane University (2013-2014), 2.26 million children work in cocoa production in Ghana and Côte d'Ivoire, i.e. an increase of 14% compared to 2008/2009 - In Côte d'Ivoire the percentage of children working in cocoa production increased from 23.1% to 34.5% - The percentage of children doing hazardous work in cocoa farming increased from 22.3% to 30.9%	- The scourge on child labor does exist, however, audit reports rarely take it into account. - Farms are rid of children during audits - It is difficult to detect the case of child labor because of the complicity of parents who hide and cover them up	- Check if there is a procedure to fight against child labor - Check if a committee exists, intervene the committee - Interviewed workers - Check whether the risk assessment takes into account the issue of child labor - Check workers' identity documents - Interview the minor workers met during the visits - Check the presence / proximity of schools
minimum wage or the wage negotiated in a Collective Bargaining Agreement	5.3.3	Cocoa, coffee, Banana, mangoes, pineapple	growing area	- Loi N°2015-532 du 14 Septembre 2015 portant CODE DU TRAVAIL - BAREME DES SALAIRES 2015 (SECTEUR AGRICOLE, ELEVAGE ET FORET) - décret n° 2022-986 du 21 décembre 2022 portant revalorisation du Salaire Minimum Interprofessionnel Garanti, le SMIG passe de 60 000 FCFA à 75 000 FCFA	Significant	Likely	Minimum wage in agriculture sector is not well known. The employment rate is high. Agriculture is not enough profitable for smallholders	Many workers are receiving less than the national minimum wage, which is low in agriculture sector.	workers refuse to answer these types of questions at the risk of losing their jobs	- Interviews and verification of payslips - Check The employment contract
Workers' working hours	5.5.1	Cocoa, coffee, Banana, mangoes, pineapple	growing area	- Loi N°2015-532 du 14 Septembre 2015 portant CODE DU TRAVAIL	Minor	Possible	Working hours are not registered	Many workers work more than authorized working hours in pic season	workers refuse to answer these types of questions at the risk of losing their jobs It is difficult to verify the veracity when at overtime, there is no register which traces the working hours of the employees, the payslips of the employees are not archived on the site of the company.	- Interviews - Check The employment contract - Check the pay slips or slips of all employees, interview with the managers of the company (HRD, accounting), the different categories of employees.
Overtime work	5.5.2	Cocoa, coffee, Banana, mangoes, pineapple	growing area	- Loi N°2015-532 du 14 Septembre 2015 portant CODE DU TRAVAIL - Conventions internationales de travail	Minor	Likely	Working hours are not registered	For many workers, overtime work are not paid		
Workers' to sufficient and safe drinking water	5.6.6	Cocoa, coffee	Cocoa, coffee growing area	- Loi N°2015-532 du 14 Septembre 2015 portant CODE DU TRAVAIL	Significant	Likely	- Safe drinking water from the national network is not available in most localities - Insufficient drinking water sources in rural areas, use of surface water sources (rivers, lowlands, etc.). - Possible water contamination at all stages of supply - Lack of protection of drinking water supply sources	- Water analysis are very expensive and the group directory can not take sample in all farm - Presence of diseases related to unsafe water	- what are The characteristics of safe drinking water or how to make safe drinking water in area where there is no national water network or hydraulic pump - Presence of diseases related to unsafe water - The analysis reports relate only to the physico-chemical quality of the water. - The dispersion of farms / members.	RA must give clear instruction for safe drinking water: - water color - cleanliness of water body - how to consider wells? - water analysis need to be consider in all situation? - Check the preventive measures in case of contamination - Interview with workers and the community to find out if the drinking water provided is sufficient - Check if there are water related diseases

rights of indigenous peoples and local communities	5.8.1	Cocoa, coffee, Banana, mangoes, pineapple	growing area	<ul style="list-style-type: none"> - Loi N°2015-532 du 14 Septembre 2015 portant CODE DU TRAVAIL - Constitution de la Côte d'Ivoire, Article 12 - Loi-N°1998-750 du 23 décembre 1998 modifié du domaine foncier rural - Décret 2021-440 du 08 septembre 2021 fixant les conditions et modalités de création et de gestion des forêts communautaires - décret N°2020-424 du 29 avril 2020 définissant les modalités de protection des forêts sacrées 	Significant	Likely	<ul style="list-style-type: none"> - Right to use the land are verbal in most case - The pressure of large companies on the occupation of land by populations 	<ul style="list-style-type: none"> - Protect the legitimate rights of land use over the lands of individuals or companies, the lands of producers under group administration, leased lands or lands in community or indigenous territories. 	<ul style="list-style-type: none"> - It is difficult to have advance information about conflicts over land tenure in the region. - Property and nationality are linked, the land issue remains one of the main drivers of the Ivoirian conflict. The right to use agricultural land also remains subject to interpretation, in particular with regard to the articles of the law relating to "ownerless" land most often governed by customary arrangements. 	<ul style="list-style-type: none"> - Ra provided Annex 11 - Interview members on their legitimate right to land ownership; the time of detention, from which the land was acquired - Investigate with the neighboring community concerning conflicts, land limits - Check the cartographic boundaries - Interview of members and the community on the mode of land acquisition
Legal and legitimate right to use the land	5.8.2	Banana, mangoes, pineapple	growing area	<ul style="list-style-type: none"> - Code Foncier de 1998, Droit coutumier 	Significant	Likely	<ul style="list-style-type: none"> - Right to use the land are verbal in most case - The villagers are often dispossessed of their land, for the benefit of rubber companies. - Only 4% of land is registered in rural areas despite significant investment - The fall in cocoa prices is causing great tension on the ground. Indeed the income from rental contracts, such as the "Planter-Partner" which is based on the income from the harvest has fallen. 	<ul style="list-style-type: none"> - The villagers are now without resources. They can no longer cultivate food; - development of defects; - destruction of their sacred forest; 	<ul style="list-style-type: none"> - Lack of documents to certify the villagers' right to their land. What does the Ivoirian land code say about this? - Cultural incompatibility between the terms of the law (known as 98) which governs rural land and custom. The law advocates individual private property whereas, traditionally, property is more family-owned. Whoever wants a land title must divide the family land. This phase is not easy to achieve everywhere. 	<ul style="list-style-type: none"> - Check the land titles of the population - Interview the customary authorities, some inhabitants of all the surrounding villages, also question the officials of the rubber society - Check the Free, Prior and Informed Consent (FPIC) Processes
Destruction of natural forests and other natural ecosystems	6.1.1	Cocoa, coffee, Banana, mangoes, pineapple	All growing area	<ul style="list-style-type: none"> - Loi N° 2014- 427 DU 14 JUILLET 2014 portant Code forestier -Loi N° 2023-900 DU 23 novembre 2023 portant code de l'environnement - Décret N° 66-422-du-15-septembre-1966 portant Création de la SODEFOR - Loi N° 2016-554 du 26 Juillet 2016 relative à la pêche et à l'aquaculture - Document de stratégie du programme national sur le changement climatique - Décret N°2020-423 du 29 avril 2020 fixant les conditions de déboisement et de défrichement dans le domaine forestier national 	Significant	Likely	<ul style="list-style-type: none"> - Naturel forests and natural ecosystems are not well know and recognize - Traditional practice of establishing new cocoa plantations on soils deemed fertile and colonized by fallows and forests. - Low capacity to fertilize farm soils. 	<ul style="list-style-type: none"> - Makes it difficult to claim "deforestation free." - Large areas of forest are disappearing little by little 	<ul style="list-style-type: none"> - There is many definition of natural forest and natural ecosystem 	<ul style="list-style-type: none"> - Need of a clear definition of natural forest and natural ecosystem - Inventory and management plan - Protection of natural ecosystems and protected areas in the area, - Use of GPS, Use of Global Forest Watch, - Interview, visit of farms, - Check information with state bodies
protected areas or buffer zones	6.1.2	cocoa, coffee	Cocoa, coffee growing area	<ul style="list-style-type: none"> - Décret N° 2002-359 du 24 Juillet 2002, portant création, organisation et fonctionnement de l'OIPR - Loi n° 2002-102 du 11 février 2002 relative à la création, à la gestion et au financement des parcs nationaux et des réserves naturelles - Décret N° 66-428-du-15-septembre-1966 fixant les procédures de classement et de déclassement des forêts domaniales - Loi N° 2014- 427 DU 14 JUILLET 2014 portant Code forestier - Document de stratégie du programme national sur le changement climatique - Loi N° 2023-900 du 23 novembre 2023 portant code de l'environnement 	Significant	Likely	<ul style="list-style-type: none"> - Smallholders clandestinely practice "creeping deforestation"; large landowners buy recently deforested land 	<ul style="list-style-type: none"> - Makes it difficult to claim "deforestation free." - Large areas of forest are disappearing little by little 	<ul style="list-style-type: none"> - It is difficult to get aerial photos or other imagery for these areas. Coverage is limited in Google Earth and Global Forest watch. 	<ul style="list-style-type: none"> - Previous analysis of different images sources. Community interviews and public consultations. Walk boundaries of farms and look for evidence.
Monitoring of natural vegetation cover	6.2.3	cocoa, coffee	Cocoa, coffee growing area	<ul style="list-style-type: none"> - Décret N° 2002-359 du 24 Juillet 2002, portant création, organisation et fonctionnement de l'OIPR - Loi n° 2002-102 du 11 février 2002 relative à la création, à la gestion et au financement des parcs nationaux et des réserves naturelles - Décret N° 66-428-du-15-septembre-1966 fixant les procédures de classement et de déclassement des forêts domaniales - Loi N° 2014- 427 DU 14 JUILLET 2014 portant Code forestier - Document de stratégie du programme national sur le changement climatique - Arrêté n°007/MINEF/CAB du 06 janvier 2021 déterminant les conditions et les modalités d'enregistrement des forêts 	Significant	Likely	<ul style="list-style-type: none"> - Farmers don't know when area under natural vegetation cover is sufficient or not 	<ul style="list-style-type: none"> - Continuous deforestation in farm until a critical threshold in most of farms 	<ul style="list-style-type: none"> - It is difficult to get aerial photos or other imagery for these areas. Coverage is limited in Google Earth and Global Forest watch. It is difficult to do loss calculation. How to measure percentage of the total area under natural vegetation cover? 	<ul style="list-style-type: none"> - Previous analysis of different images sources. Need for a tool for percentage of the total area under natural vegetation cover measurement
No hunting or killing of wildlife	6.4.1	cocoa, coffee	Cocoa, coffee growing area	<ul style="list-style-type: none"> - Loi N° 94-442 portant modification de la loi N° 65-255 relative à la protection de la faune et à l'exercice de la chasse. - N°2023-900 du 23 novembre 2023 portant code de l'eau -Loi N° 2023-900 du 23 novembre 2023 portant code de l'environnement - Loi N° 2016-554 du 26 Juillet 2016 relative à la pêche et à l'aquaculture - Document de stratégie du programme national sur le changement climatique 	Significant	Likely	<ul style="list-style-type: none"> - Traditional hunting as a means of subsistence. - Popular consumption of bushmeat 	<ul style="list-style-type: none"> - Progressive disappearance of protected and threatened wild species, degradation of natural habitats of wild animals 	<ul style="list-style-type: none"> - Difficulty relating the facts and trace of a limb hunt 	<ul style="list-style-type: none"> - Inventory and hunting ban policy, interviews, observation. - Investigate the communities that have hunting practices - Observe hunting tracks, animal traps, guns, the company of hunting dogs and interview members before any conclusion. - Also check that toxic substances are not used for hunting and fishing.
Processing wastewater	6.6.1	Cocoa, Banana, mangoes, pineapple, cocconut	All growing area	<ul style="list-style-type: none"> -Loi n°2023-902 du 23 novembre 2023 portant code de l'eau -Loi N° 2023-900 du 23 novembre 2023 portant code de l'environnement - Décret no 2012-1047 du 24 octobre 2012 fixant les modalités d'application du principe Pollueur-Payeur. - Arrêté n° 01164 MINEEF/CIAPOL/SDIC du 04 novembre 2008 portant réglementation des rejets et émissions des Installations Classées pour la Protection de l'environnement 	Moderate	Possible	<ul style="list-style-type: none"> - The Lack of an industrial wastewater treatment system - Lack of expertise in industrial wastewater treatment 	<ul style="list-style-type: none"> - Contamination of surface and underground water by the infiltration of untreated wastewater before spillage, which can lead to public health problems 		<ul style="list-style-type: none"> - Verification of the water management plan (waste and drinking water) - Results of analyzes of industrial wastewater and surrounding waterways and soils - Observation industrial wastewater discharge areas - Check the characteristics of the soil where the wastewater is poured, the slope "

Net Greenhouse Gases (GHG) emissions	6.9.1	Cocoa, coffee, Banana, mangoes, pineapple	All growing area		Significant	Possible	Ignorance of the consequences of using different energy sources	Climate change	How to calculate GHG emissions	RA provided guidance document P
Polygons are available for all farm units of 4ha and above. Geolocation points are available for all other farm units.	EUDR1	Cocoa, coffee,	Cocoa, coffee growing area	- Loi n°94-442 du 16 août portant modification de la loi n° 65-255 du 04 août 1965 relative à la protection de la faune et de la commercialisation des semences et plants - Loi n°64-490 du 21 décembre 1964 relative à la protection des végétaux - Loi n° 2015-537 du 20 juillet 2015 d'orientation agricole	Significant	Very Likely	The CH's don't know how to use technology, how to use application for checking	Makes it difficult to confirm that there is no certified culture in protected area. And to get the actual farm size.	-The sometimes high number of producer files put in place; - Unavailability of GPS; - The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups - The declaration of areas during audits and almost always different from the areas in the registers. "	- Previous analysis of GPS coordinates and different images sources. - Equip auditors for the verification of a determinate number of GPS coordinates and farms size -RA provided Guidance Document F
Geolocation data for both points and polygons must have 6 decimals.	EUDR2	Cocoa, coffee,	Cocoa, coffee growing area	- Loi n°94-442 du 16 août portant modification de la loi n° 65-255 du 04 août 1965 relative à la protection de la faune et de la commercialisation des semences et plants - Loi n°64-490 du 21 décembre 1964 relative à la protection des végétaux - Loi n° 2015-537 du 20 juillet 2015 d'orientation agricole	Significant	Very Likely	The CH's don't know how to use technology, how to use application for checking	Makes it difficult to confirm that there is no certified culture in protected area. And to get the actual farm size.	-The sometimes high number of producer files put in place; - Unavailability of GPS; - The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups - The declaration of areas during audits and almost always different from the areas in the registers. "	- Previous analysis of GPS coordinates and different images sources. - Equip auditors for the verification of a determinate number of GPS coordinates and farms size -RA provided Guidance Document F
Management implements measures to prevent and address potential cases of corruption (including bribery and extortion), fraud and nepotism by: - A written public statement that is communicated to group members/workers and supply chain partners- Training of management and workers/group members to raise awareness of possible forms, at least annually - Taking measures to avoid, and to remediate cases	EUDR3	Cocoa, coffee,	Cocoa, coffee growing area	ORDONNANCE n° 2013-660 du 20 septembre 2013 relative à la prévention et à la lutte contre la corruption et les infractions assimilées.	Significant	Likely	lack of money	we cannot trust everything he has put in place as an activity.	document authentication difficulties	-stakeholder interview -verification of contracts between the CH and the service providers
Management shows evidence of payment of all applicable fees, royalties, taxes and other charges as prescribed by local laws and regulations.	EUDR4	Cocoa, coffee,	Cocoa, coffee growing area	code general des impots 2024	Significant	Possible	lack of money	We run the risk of certifying a CH which does not comply with the laws of the country	knowledge of the taxes applicable to different types of CH	verification of proof of payment



RAINFORREST ALLIANCE
RISK ASSESSMENT
2020 RA STANDARD

		For RA use only	
Certification body:	BUREAU VERITAS CÔTE D'IVOIRE	Date reviewed:	
Country:	Ghana	Reviewed by:	
Date submitted:	16/04/2024	Approved by:	
Contact person:	AKA MARIE BERTHE	Date approved:	

(Risk = risks to non-compliance)

Compliance topic	Related standard requirement	Risks related to specific--			Severity	Likelihood	What are the root causes	Why is this risk so important?	Interpretation challenges	Auditing technique to detect & reduce risks
		Crop(s)	Region(s)	Laws						
Chapter 1 Administration	1.2.10	All crops	All regions	The Farm lands (Protection) Act 1962 Act 107 Survey Act 1962, Act 127	Minor	Possible	1. High cost of digital mapping for small holder groups. 2. Undeclared farm plots/units by some farmers of the group	Leads to inaccurate determination of total farm areas, production areas and potential destruction of the natural ecosystem. The exact boundaries of each farm plot may not be accurate	Its unclear the format in which the maps must be kept especially for small holder farmers. Thus maps must be done in a digital format or hand sketch format.	Verify the availability of farm maps and the date when the map was created and the last date of revision to ensure the map is up to date. Compare the maps with the actual site visit to check locations, boundaries, neighboring plots etc. to see if there are any differences.
Chapter 1 Administration	1.2.11	All crops	All regions	The Farm lands (Protection) Act 1962 Act 107 Survey Act 1962, Act 127	Moderate	Possible	Not every farm is internally inspected especially farmers with multiple farm units. The hand sketch maps are done with high level of human errors	This may lead to unrealistic sketch maps which lack certain risk features of the farm.	Its difficult to make conclusion on the reality of the sketch maps since there is no range or measure for percentage of accuracy.	Verify that there is a hand-drawn map that shows production areas, any forests, buildings, water bodies, as well as a legend that is clearly marked. During the field visit, verify that the map accurately and realistically depicts what is found there (ex. auditor has seen a body of water during the audit which was not on the map)
Chapter 1 Administration	1.2.12	All crops	All regions	The Farm lands (Protection) Act 1962 Act 107 Survey Act 1962, Act 127	Moderate	Possible	1. There is no standardized device and software for GPS or/and polygon mapping 2. Low technical know-how on taking GPS/polygon maps by implementers	leads to inaccurate determination of total farm areas, production areas and potential destruction of the natural ecosystem. The exact boundaries of each farm plot may not be accurate	Its difficult to determine the actual large farm among the farm units since farmers with multiple farm units are not aware of the sizes of their farms.	Check for the availability of geolocation data in GMR and in the member list for all the registered farmers. check whether the largest farm unit has the geolocation same as what auditors map.
Chapter 1 Administration	1.2.13	All crops	All regions	The Farm lands (Protection) Act 1962 Act 107 Survey Act 1962, Act 127	Minor	Unlikely	1. There is no standardized device and software for GPS or/and polygon mapping 2. Low technical know-how on taking GPS/polygon maps by implementers.	leads to inaccurate determination of total farm areas, production areas and potential destruction of the natural ecosystem. The exact boundaries of each farm plot may not be accurate	Its difficult to determine the actual large farm among the multiple farm units are not aware of the sizes of their farms.	Check for the availability of geolocation data in GMR and in the member list for all the registered farmers. check whether the largest farm unit has the geolocation same as what auditors map.
Chapter 2 Traceability	2.1.1	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81)	Negligible	Very Unlikely	n/a	n/a	n/a	Review system/ procedures in place to estimate certified production volume per year for each group member/ farm and the total certified production. Review system/ procedures in place to estimate certified production volume per year for each group member/ farm and the total certified production. Verify that the estimated production is calculated with a credible methodology for field estimation (to assess credibility of the methodology use the points below)
Chapter 2 Traceability in the Online Platform	2.2.2	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81)	Negligible	Very Likely	n/a	n/a	n/a	Check the presence of a system/ procedures in place to verify the correspondence between transactions in the traceability platform and purchase invoices. Check that the verification of transactions in the traceability platform against purchase invoices is conducted regularly. Review a sample of purchase receipts against transactions in the traceability platform to verify that they match
Chapter 2 Traceability	2.1.8	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81)	Negligible	Very Likely	n/a	n/a	n/a	At group member level, verify the availability of sale receipts. Verify that sale receipts include the names of group members, group IDs, dates, product types and volumes. Compare information with data recorded by Group management.
Chapter 2 Traceability	2.1.2	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Cocoa Industry (Regulation) Consolidation Decree, 1968 (NLCD 278)	Moderate	Possible	Landholdings of farmers are small in sizes, thus there is a risk of intentional mixing of non-certified products with certified products to increase volume of delivered cocoa beans. Monitoring and internal inspection on harvested quantity may not be formidable at each time by the Group Administrator	Integrity of the certified product can be compromised	n/a	Record review: Review availability of system/ procedures in place to record yearly harvested product and a yearly balance of products purchased, produced, sold and in stock. Compare group members' sales receipts and the records of the harvested yields with Group management's purchase documents and total harvested yield. In case there is more than a 15% difference between the estimated production and actual harvested volume, evaluate the justification for this discrepancy and the measures being taken to prevent its recurrence.
Chapter 2 Traceability	2.1.3	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Cocoa Industry (Regulation) Consolidation Decree, 1968 (NLCD 278)	Moderate	Possible	Landholdings of farmers are small in sizes, thus there is a risk of intentional mixing of non-certified products with certified products to increase volume of delivered cocoa beans. Monitoring and internal inspection on harvested quantity may not be formidable at each time by the Group Administrator	Integrity of the certified product can be compromised	n/a	Record review: Verify there are systems and procedures in place to ensure visual segregation of certified products from non-certified products at all stages (transport, storage, processing) If multiple certifications are used (Rainforest Alliance and other certification schemes), verify that the systems/ procedures in place ensure the visual segregation of Rainforest Alliance certified products at all times during transport, storage and processing.
Chapter 2 Traceability	2.1.5	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Cocoa Industry (Regulation) Consolidation Decree, 1968 (NLCD 278)	Moderate	Possible	Landholdings of farmers are small in sizes, thus there is a risk of intentional mixing of non-certified products with certified products to increase volume of delivered cocoa beans. Monitoring and internal inspection on harvested quantity may not be formidable at each time by the Group Administrator	Integrity of the certified product can be compromised	n/a	Record review: Check traceability and segregation system and procedures in place For groups, perform a traceability exercise from the group-certified product to the field (certified farm/s) for a sample of the members. The traceability exercise results confirm the accuracy of the product flow chart/ map/Review availability of system/ procedures in place to record yearly harvested product and a yearly balance of products purchased, produced, sold and in stock. Compare group members' sales receipts and the records of the harvested yields with Group management's purchase documents and total harvested yield.
Chapter 2 Traceability	2.1.4	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Cocoa Industry (Regulation) Consolidation Decree, 1968 (NLCD 278)	Minor	Unlikely	n/a	n/a	n/a	Verify the existence of the product flow chart/ map. Check if the product flow chart/ map is complete and includes every activity carried out on the product up to the final location of the certificate scope including collection points, transport, processing units, warehouses, all intermediaries (if applicable), and others. Verify the accuracy of the product flow chart/ map by checking a sample of documents (collecting point records/tickets, transport records, delivery notes, purchase invoices, etc)
Chapter 2 Traceability	2.1.6	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Cocoa Industry (Regulation) Consolidation Decree, 1968 (NLCD 278)	Minor	Unlikely	n/a	n/a	n/a	Check there are systems/ procedures in place to ensure that no overselling of Rainforest Alliance-certified products occurs. Check there is a description of the volume-balance process. Perform a product flow verification. Review production (in the case of farms), purchase and sales figures as well as remaining stocks and cross-check to ensure no overselling has occurred.

Chapter 2 Traceability	2.1.7	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Cocoa Industry (Regulation) Consolidation Decree, 1968 (NLCD 278)	Minor	Unlikely	n/a	n/a	n/a	Check the systems and procedures in place to ensure that certified products are not double sold. Check purchase and sales documents linked to physical deliveries from the certified, multi-certified and non-certified products plus overall calculation of input and output.
Chapter 2 Traceability	2.1.9	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Cocoa Industry (Regulation) Consolidation Decree, 1968 (NLCD 278)	Minor	Unlikely	n/a	n/a	n/a	Review the product flow chart/ map to determine the products included in the scope and which conversion factors to review. Review recipes / conversion ratios for products. Verify the methodology used to calculate conversion factors and verify support documentation (technical sheets and others)
Chapter 2 Traceability in the Online Platform	2.2.1	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Cocoa Industry (Regulation) Consolidation Decree, 1968 (NLCD 278)	Negligible	Very Unlikely	n/a	n/a	n/a	Review the system/ procedures in place to report sales on the Rainforest Alliance traceability platform. Check that the system/procedure requires sales to be reported at the latest two weeks after the end of the quarter within which the shipment took place.
Chapter 2 Traceability in the Online Platform	2.2.3	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Cocoa Industry (Regulation) Consolidation Decree, 1968 (NLCD 278)	Negligible	Very Unlikely	n/a	n/a	n/a	Review the system/ procedures in place to remove volumes sold as non-certified or lost from the traceability platform. Check the Rainforest Alliance traceability platform concerning the removal of volumes sold as non-certified or for volumes that were lost
Chapter 2 Traceability in the Online Platform	2.2.4	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Cocoa Industry (Regulation) Consolidation Decree, 1968 (NLCD 278)	Negligible	Very Unlikely	n/a	n/a	n/a	Review system/ procedures in place for the use of the Rainforest Alliance Trademark. Review if certificate holder complies with the Rainforest Alliance Labeling Policy and obtains approval for on and off product trademarks prior to use. Review approvals for trademark use in traceability platform
Chapter 2 Mass Balance	2.3.1	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Cocoa Industry (Regulation) Consolidation Decree, 1968 (NLCD 278)	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: Review of the relevant management system/ procedure governing the application of volume credits and conversion ratios. Review of the documentation demonstrating the application of volume credits to verify that conversions is plausible/possible in reality.
Chapter 2 Mass Balance	2.3.2	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Cocoa Industry (Regulation) Consolidation Decree, 1968 (NLCD 278)	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: Review of mass balance system/ procedures. Review calculations and recipe breakdown and verify that volumes sold as mass balance are covered by volumes purchased as certified which are appropriately deducted in the traceability platform.
Chapter 2 Mass Balance	2.3.3	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Cocoa Industry (Regulation) Consolidation Decree, 1968 (NLCD 278)	Negligible	Very Unlikely	n/a	n/a	n/a	Verify purchase documentation for the certified cocoa beans/ibs and cross-check with the volumes in the traceability platform.
Chapter 2 Mass Balance	2.3.4	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Cocoa Industry (Regulation) Consolidation Decree, 1968 (NLCD 278)	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: Review that purchase and sales documentation for volumes sold as certified include origin information to the country level for incoming certified and non-certified cocoa beans.
Chapter 2 Mass Balance	2.3.5	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Cocoa Industry (Regulation) Consolidation Decree, 1968 (NLCD 278)	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: Verify a sample of transactions to check that for each transaction completed in the traceability platform there is corresponding sales and shipment documents. Verify that credit transfers from one certificate to another are always accompanied by the physical shipment of actual product.
Chapter 1 Administration	1.2.3	All crops	All regions	Registration of Business Names Act 1962, Act 151 Companies Code, 2014 Environmental Protection Agency Act, 1994 Act 490. However there is no specific law regarding selection of service providers in the private sector	Moderate	Possible	Group Administrators do not document and implement mechanisms to monitor and manage service providers' compliance to Critical Criteria	Service providers who do not conform to the environmental and social requirements of the SAN Standard are engaged	Process for outsourcing goods and services by Group Administrators does not follow competitive bidding	Document Review: Check for availability of list of subcontractors, suppliers and intermediaries. Verify that the copies of product certificates/endorsements or certificate numbers for each subcontractor or supplier are available. That there is a procedure to verify that these subcontractors, suppliers and intermediaries are compliant to certification rules prior to or when the activity takes place (e.g. transaction, processing, packing, collecting)
Chapter 1 Administration	1.2.2	All crops	All regions	Registration of Business Names Act 1962, Act 151 Companies Code, 2014 Environmental Protection Agency Act, 1994 Act 490. However there is no specific law regarding selection of service providers in the private sector	Moderate	Possible	Group Administrators do not document and implement mechanisms to monitor and manage service providers' compliance to Critical Criteria	Service providers who do not conform to the environmental and social requirements of the SAN Standard are engaged	Process for outsourcing goods and services by Group Administrators does not follow competitive bidding	Records: review selection procedure used (sole sourcing, competitive tendering, etc) vis-à-vis the award of contract documents, monitoring reports of service providers, engaged and Management Planning reports
Chapter 5 Wages and Contracts	5.3.9	All crops	All regions	National Labour Act, 2003 Act 651	Negligible	Very Unlikely	n/a	n/a	n/a	Take samples of service providers for labor or labor contractors as per the Auditing Rules and review their contracts with management. Verify whether the contract specifies the license or approval required and, their compliance with applicable legal requirements, and with applicable requirements of the RA standard
Chapter 5 Wages and Contracts	5.3.10	All crops	All regions	National Labour Act, 2003 Act 651	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: Check copies of the official licenses or registrations of all labor providers. Check that group management has a list of all labor providers, including name, contact information and record of their official registration (if applicable). Check payment records of recruitment fees or commissions to verify these are paid by the employer. Check workers' wage records to ensure there are no deductions for recruitment fees.
Chapter 1 Management	1.1.1	All crops	All regions	No applicable law	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: • The Management Capacity Assessment Tool is filled out, dated and is updated once every three years • The Management Capacity Assessment Tool is filled in correctly and reflects the context and current situation • Cross-check that the information completed in the Management Capacity Assessment Tool reflects the information collected in the review of documents
Chapter 1 Administration	1.2.1	All crops	All regions	National Labour Act, 2003 Act 651	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: Verify whether the producer /management has identified a list of auditable laws. Review records of implementation plan outline in risk assessment and management plan. Embark on field verification on actions taken.
Chapter 1 Risk Assessment & Management Plan	1.3.1	All crops	All regions	Registration of Business Names Act 1962, Act 151 Companies Code, 2014 Environmental Protection Agency Act, 1994 Act 490.	Moderate	Possible	Poor implementation of mitigation actions outlined in the documented risk assessment and management plan	Poor implementation of mitigation actions stand the risk of impeding sustainable production and certification program	Lack of the needed requisite resources for the implementations mitigation actions according to specific timelines	Review records of implementation plan outline in risk assessment and management plan. Embark on field verification on actions taken.
Chapter 1 Risk Assessment & Management Plan	1.3.2	All crops	All regions	Registration of Business Names Act 1962, Act 151 Companies Code, 2014 Environmental Protection Agency Act, 1994 Act 490.	Moderate	Possible	Poor implementation of mitigation actions outlined in the documented risk assessment and management plan	Poor implementation of mitigation actions stand the risk of impeding sustainable production and certification program	Lack of the needed requisite resources for the implementations mitigation actions according to specific timelines	Review records of implementation plan outline in risk assessment and management plan. Embark on field verification on actions taken.
Chapter 4 Planting and Rotation	4.1.1	All crops	All regions	No applicable law	Moderate	Possible	Low technical knowledge of small holder farmers to practice the recommended planting and rotation techniques	This affects productivity of plant yields and methodology of yield estimation leading to unrealistic yield figures	This makes it difficult for auditors to follow the documented yield estimation for verification.	review of the yield estimate methodology and field verification and evaluation of the crop.

Chapter 4 Planting and Rotation	4.1.2	All crops	All regions	No applicable law	Moderate	Possible	Low technical knowledge of small holder farmers to practice the recommended planting and rotation techniques	This affects productivity of plant yields and methodology of yield estimation leading to unrealistic yield figures	This makes it difficult for auditors to follow the documented yield estimation for verification.	review of the yield estimate methodology and field verification and evaluation of the crop.
Chapter 4 Pruning and Renovation of Tree Crops	4.2.1	All crops	All regions	No applicable law	Moderate	Possible	Low technical knowledge of small holder farmers to practice the recommended planting and rotation techniques	This affects productivity of plant yields and methodology of yield estimation leading to unrealistic yield figures	This makes it difficult for auditors to follow the documented yield estimation for verification.	review of the yield estimate methodology and field verification and evaluation of the crop.
Chapter 1 Risk Assessment & Management Plan	1.3.4	All crops	All regions	National Labour Act, 2003 Act 651; Companies Code, 2014	Negligible	Very Unlikely	n/a	n/a	n/a	<ul style="list-style-type: none"> •Check the implemented activities are recorded in sufficient detail so that it is easy to understand how they were implemented, if they have achieved their intended goals and that they are supported by documents (training records, training participants, etc.) •Cross-check the number of people attending the trainings/ awareness-raising activities
Chapter 4 Agrochemical Management	4.6.8	All crops	All regions	Pesticides Control and Management Act, 1996 Act 528 EPA Act, 1994 Act 490	Significant	Likely	Very low level of education of some small holders contributes to the failure of keeping records on pesticide application	No records on pesticide use pose the risk of use of unapproved pesticides by farmers and underdose and overdose applications	This makes it difficult for auditors to verify for source, brand, rate of application and time of application of pesticides	Interview to verify for approved and banned pesticides. Review available records of pesticides applications.
Chapter 4 Harvest and Post-Harvest Practices	4.7.1	All crops	All regions	Pesticides Control and Management Act, 1996 Act 528 EPA Act, 1994 Act 490	Moderate	Possible	Very low level of education of some small holders contributes to the failure of keeping records on pesticide application	No records on pesticide use pose the risk of use of unapproved pesticides by farmers and underdose and overdose applications	This makes it difficult for auditors to verify for source, brand, rate of application and time of application of pesticides	Interview to verify for approved and banned pesticides. Review available records of pesticides applications.
Chapter 1 Administration	1.2.4	All crops	All regions	Citizenship Act 2000, Act 591 National Identity Register LI 2111, Regulation 2012 Registration of Birth and Death Act 1965, Act 301	Negligible	Very Unlikely	n/a	n/a	n/a	<p>Document Review:</p> <ul style="list-style-type: none"> •Check the availability of the group member registry submitted by Group management •Verify that the list has the most updated details of both new and long-term members •Cross-check the list with the internal audit reports to verify whether the details correspond •Verify a sample of data registry entries against documents related to it provided by members to ensure they correspond •Check national ID cards or other official document as proof of identification
Chapter 1 Administration	1.2.9	All crops	All regions	Citizenship Act 2000, Act 591 National Identity Register LI 2111, Regulation 2012 Registration of Birth and Death Act 1965, Act 301	Negligible	Very Unlikely	n/a	n/a	n/a	<p>Document Review:</p> <ul style="list-style-type: none"> •Check the document management and archiving procedures in place for both physical documents and digital logs/documents and that it contains complete records for at least 4 years •Check the system and procedure in place for record keeping and protection from loss of data •Check whether the document management system is also used to keep records for group members, and whether group members have adequate access to the documentation under these conditions
Chapter 1 Internal Inspection and Self-Assessment	1.4.1	All crops	All regions	No applicable law	Moderate	Possible	Low technical capabilities of qualified internal inspectors to thoroughly assess the compliance of members to applicable Criteria and also to follow up on corrective action measures	Farmers who did not implement adequate corrective actions are approved and included to the Group	Groups with large members exceeding 1000 farmers will have operational challenges to conduct robust internal inspections	Records: Selection procedure for Internal Inspectors recruited, Training records, Conflict of Interest declaration records, Internal Inspection Reports, Proposed corrective actions and closure dates, Approval date, person(s) and assigned reasons, witness audit of internal inspection by the Internal Inspector during the audit and interviews with Internal Inspectors and Approval committee members.
Chapter 1 Internal Inspection and Self-Assessment	1.4.2	All crops	All regions	No applicable law	Moderate	Possible	Low technical capabilities of qualified internal inspectors to thoroughly assess the compliance of members to applicable Criteria and also to follow up on corrective action measures	Farmers who did not implement adequate corrective actions are approved and included to the Group	Groups with large members exceeding 1000 farmers will have operational challenges to conduct robust internal inspections	Records: Selection procedure for Internal Inspectors recruited, Training records, Conflict of Interest declaration records, Internal Inspection Reports, Proposed corrective actions and closure dates, Approval date, person(s) and assigned reasons, witness audit of internal inspection by the Internal Inspector during the audit and interviews with Internal Inspectors and Approval committee members.
Chapter 1 Internal Inspection and Self-Assessment	1.4.3	All crops	All regions	No applicable law	Moderate	Possible	Low technical capabilities of qualified internal inspectors to thoroughly assess the compliance of members to applicable Criteria and also to follow up on corrective action measures	Farmers who did not implement adequate corrective actions are approved and included to the Group	Groups with large members exceeding 1000 farmers will have operational challenges to conduct robust internal inspections	Records: Selection procedure for Internal Inspectors recruited, Training records, Conflict of Interest declaration records, Internal Inspection Reports, Proposed corrective actions and closure dates, Approval date, person(s) and assigned reasons, witness audit of internal inspection by the Internal Inspector during the audit and interviews with Internal Inspectors and Approval committee members.
Chapter 1 Internal Inspection and Self-Assessment	1.4.4	All crops	All regions	No applicable law	Moderate	Possible	Low technical capabilities of qualified internal inspectors to thoroughly assess the compliance of members to applicable Criteria and also to follow up on corrective action measures	Farmers who did not implement adequate corrective actions are approved and included to the Group	Groups with large members exceeding 1000 farmers will have operational challenges to conduct robust internal inspections	Records: Selection procedure for Internal Inspectors recruited, Training records, Conflict of Interest declaration records, Internal Inspection Reports, Proposed corrective actions and closure dates, Approval date, person(s) and assigned reasons, witness audit of internal inspection by the Internal Inspector during the audit and interviews with Internal Inspectors and Approval committee members.
Chapter 1 Administration	1.2.8	All crops	All regions	Data protection Act, 2012	Minor	Unlikely	n/a	n/a	n/a	<p>Document Review:</p> <ul style="list-style-type: none"> •Verify a sample of members' contracts and that they are signed by both parties •Verify the availability of contracts at the JMS office and that members also have a copy. •Check the contract contains specific clauses on abiding by the rules of Rainforest Alliance, access for inspectors, sales of certified products through the group and their rights to appeal
Chapter 1 Risk Assessment & Management Plan	1.3.3	All crops	All regions	National Labour Act, 2003 Act 651; Companies Code, 2014	Negligible	Very Unlikely	n/a	n/a	n/a	<p>Document Review:</p> <ul style="list-style-type: none"> •Check if services to the members are included in the management plan and that the description of the actions are sufficiently detailed for their implementation, success and evaluation •Check the type of service provided (e.g. support in record keeping), cross-check with the entries in farm books, access to inputs (check the distribution of inputs)
Chapter 3 Sustainability Differential	3.2.1	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Co-operative Societies Act (1968), Consolidation Decree, 1968 (NLCD 278)	Minor	Unlikely	n/a	n/a	n/a	<p>Document Review:</p> <ul style="list-style-type: none"> •Check annual documentation evidencing prices paid by first buyers as well as the Sustainability Differential received by volume of certified products •Verify that records of the Sustainability Differential payment are separately kept for each buyer and clearly distinguish market price, and other premiums such as quality premiums or crop- and country-specific premiums such as the Living Income Differential
Chapter 3 Sustainability Differential	3.2.2	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Co-operative Societies Act (1968), Consolidation Decree, 1968 (NLCD 278)	Minor	Unlikely	n/a	n/a	n/a	<p>Document Review:</p> <ul style="list-style-type: none"> •Check the number of individual first buyers and evidence of Sustainability Differential received (total and by volume) from each of these buyers. •Verify that the records clearly distinguish the Sustainability Differential from the market price and other premiums, such as quality premiums or crop- and country-specific premiums.
Chapter 3 Sustainability Differential	3.2.3	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Co-operative Societies Act (1968), Consolidation Decree, 1968 (NLCD 278)	Minor	Unlikely	n/a	n/a	n/a	<p>Document Review:</p> <ul style="list-style-type: none"> •Review invoices/ records of payment and verify the inclusion of the Sustainability Differential. •Confirm that the Sustainability Differential can be distinguished from other payments, such as market price, quality premiums, country or crop premiums, other premiums

Chapter 3 Sustainability Differential	3.2.4	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Co-operative Societies Act (1968); Consolidation Decree, 1968 (NLCD 278)	Minor	Unlikely	n/a	n/a	n/a	Check the existence of a contract/document agreement in place governing the Sustainability Differential payment. Review the contract/document agreement to verify the amount of the Sustainability Differential, timing, the other terms, and that the contract is signed by both parties.
Chapter 3 Sustainability Differential	3.2.5	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Co-operative Societies Act (1968); Consolidation Decree, 1968 (NLCD 278)	Minor	Unlikely	n/a	n/a	n/a	Review of system/ procedures in place that guarantee the timely payment of the Sustainability Differential to the farm CH selling the certified product Cross-check (all) sales/ shipments against Sustainability Differential payments received. For a sample of shipments review Sustainability Differential payment records and verify whether the correct amount (in line with the contract) was paid within the prescribed timeframe.
Chapter 3 Sustainability Differential	3.2.6	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Co-operative Societies Act (1968); Consolidation Decree, 1968 (NLCD 278)	Minor	Unlikely	n/a	n/a	n/a	Document Review: •Check the system/ procedures in place to report on the traceability platform no later than 3 months after the actual Sustainability Differential payment was made.
Chapter 3 Sustainability Differential	3.2.7	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Co-operative Societies Act (1968); Consolidation Decree, 1968 (NLCD 278)	Minor	Unlikely	n/a	n/a	n/a	Document Review: •Evaluate sales documentation and the traceability platform to assess whether the amount paid is at least the prescribed minimum set by the Rainforest Alliance
Chapter 3 Sustainability Differential	3.3.1	Cocoa, Coffee and Shea	All regions	Ghana Cocoa Board Law, 1984 (PNDC Law 81) Co-operative Societies Act (1968); Consolidation Decree, 1968 (NLCD 278)	Minor	Unlikely	n/a	n/a	n/a	Document Review: •Review that an investment plan is available •Review the sources used to define the investments needed. Cross-check the defined investment needs with information on audit reports, self-assessments, internal inspections, management plan, Risk Assessment results, Management Capacity Assessment Tool results to verify the use of such documents in the definition of investment needs. The Auditor verifies the consistency between those documents and the content of the investment plan.
Chapter 6 Environment. Forests, other natural ecosystems and protected areas	6.1.3	All crops	All regions	National Interpretation of HCVF Toolkit, 2006	Minor	Unlikely	n/a	n/a	n/a	Document Review: Verify if farm management has completed James S3 Risk Assessment Tool with regards to the natural ecosystems that have been reported on the map. Check that management has identified any deforestation or conversion of natural forest and other natural ecosystems that has occurred since 2014.
Chapter 6 Environment. Forests, other natural ecosystems and protected areas	6.1.1	All crops	All regions	Timber Resource Management Act 2002 Act 617 National Biodiversity Strategy for Ghana 2002 Forestry Commission Act 1999, Act 571 Forest and Wildlife Policy 2000	Minor	Unlikely	n/a	n/a	n/a	Document Review: •Verify that management has a plan for the farm to conserve natural ecosystems •Check the farm map (developed for requirement 1.2.10 or 1.2.11) and check that it identifies natural ecosystems and that the plan is based on the map
Chapter 6 Environment. Conservation and enhancement of natural ecosystems and vegetation	6.2.1	All crops	All regions	Timber Resource Management Act 2002 Act 617 National Biodiversity Strategy for Ghana 2002 Forestry Commission Act 1999, Act 571 Forest and Wildlife Policy 2000	Minor	Unlikely	n/a	n/a	n/a	Document Review: •Verify that management has a plan for the farm to conserve natural ecosystems •Check the farm map (developed for requirement 1.2.10 or 1.2.11) and check that it identifies natural ecosystems and that the plan is based on the map
Chapter 6 Environment. Forests, other natural ecosystems and protected areas	6.1.2	All crops	All regions	Forest Protection (Amendment) Act, 2002 Act 624 Forestry Commission Act 1999, Act 571 Forest and Wildlife Policy 2000 Trees and Timber Amendment Act 1994, Act 493	Moderate	Possible	Some farm plots are undeclared by farmers, inaccurate farm sizes since most farms are not GPS mapped and land use changes as cocoa farms are increasingly being expanded into Protected areas. Protected area maps are also not updated by the Forestry Commission frequently as some Forest Reserves although gazetted, do not have Timber Utilization Contracts.	leads to inaccurate determination of total farm areas, production areas and potential destruction of the natural ecosystem. The exact boundaries of each farm plot may not be accurate	Group Administrators must invest in technology such as GIS technology to accurately monitor land use changes and record actual farm sizes	Record review: review literature of land use changes, GPS data statistics of crop area, harvesting records (passbooks), interview of producers, walk along the entire perimeter of the farm and use GPS to physically take measurements.
Chapter 6 Environment. Protection of Wildlife and Biodiversity	6.4.1	All crops	All regions	Wildlife Conservation (Amendment) Regulation 1989 L.I. 1452 Wildlife Reserve Regulations (Amendment) 1971 L.I. 710 Wild Animals Preservation Act 1961, Act 48 National Biodiversity Strategy for Ghana	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: •Check if Group management/ farm management/ farmer has identified threatened animals and plants present in the area •Check how the ban on hunting, killing, fishing, collecting or trafficking threatened animals and plants is communicated
Chapter 6 Environment. Conservation and enhancement of natural ecosystems and vegetation	6.2.2	All crops	All regions	Timber Resource Management Act 2002 Act 617 National Biodiversity Strategy for Ghana 2002 Forestry Commission Act 1999, Act 571 Forest and Wildlife Policy 2000	Minor	Unlikely	n/a	n/a	n/a	Verify that management collects data and monitors the coverage of native vegetation including remnant forest trees
Chapter 6 Environment. Riparian buffers	6.3.1	All crops	All regions	Timber Resource Management Act 2002 Act 617 National Biodiversity Strategy for Ghana 2002 Forestry Commission Act 1999, Act 571 Forest and Wildlife Policy 2000	Minor	Unlikely	n/a	n/a	n/a	Document Review: •Review the map made and verify it clearly indicates if the farm has aquatic ecosystems and if those are protected by riparian buffers
Chapter 6 Environment. Riparian buffers	6.3.2	All crops	All regions	Timber Resource Management Act 2002 Act 617 National Biodiversity Strategy for Ghana 2002 Forestry Commission Act 1999, Act 571 Forest and Wildlife Policy 2000	Minor	Unlikely	n/a	n/a	n/a	Verify the Farm map and the identification and location of sources of drinking water.
Chapter 6 Environment. Protection of Wildlife and Biodiversity	6.4.2	All crops	All regions	Timber Resource Management Act 2002 Act 617 National Biodiversity Strategy for Ghana 2002 Forestry Commission Act 1999, Act 571 Forest and Wildlife Policy 2000	Minor	Unlikely	n/a	n/a	n/a	Document Review: • Check information provided eg posters, training records etc) to communicate the requirements related to wildlife in captivity and the five freedoms of animal welfare that apply to farm animals and captive wild animals to group members / workers
Chapter 6 Environment. Protection of Wildlife and Biodiversity	6.4.4	All crops	All regions	Timber Resource Management Act 2002 Act 617 National Biodiversity Strategy for Ghana 2002 Forestry Commission Act 1999, Act 571 Forest and Wildlife Policy 2000	Minor	Unlikely	n/a	n/a	n/a	Visit the harvesting and processing areas. Observe whether there is evidence of animals being used to harvest/ process crops (e.g. monkeys for coconut harvesting or luwak for coffee processing)
Chapter 6 Environment. Protection of Wildlife and Biodiversity	6.4.3	All crops	All regions	Timber Resource Management Act 2002 Act 617 National Biodiversity Strategy for Ghana 2002 Forestry Commission Act 1999, Act 571 Forest and Wildlife Policy 2000	Minor	Unlikely	n/a	n/a	n/a	Check any documentation on the introduction of new species to the farm (eg reforestation records, biological-control records etc and that this does not include invasive species
Chapter 6 Environment. Wastewater Management	6.6.1	All crops	All regions	Water Resource Commission Act, 1996 Act 522 Water Use Regulations, 2001	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: •Verify if farm management/ Group management has access to applicable wastewater legal requirements •Verify records of processing wastewater tests
Chapter 6 Environment. Wastewater Management	6.6.3	All crops	All regions	Water Resource Commission Act, 1996 Act 522 Water Use Regulations, 2001	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: •Check the farm's irrigation plan or records to see if it involves the use of wastewater and how the water is treated to comply with wastewater parameters for irrigation
Chapter 6 Environment. Wastewater Management	6.6.2	All crops	All regions	Environmental Sanitation Policy 2009	Minor	Unlikely	n/a	n/a	n/a	Document Review: •If portable toilets are used on site, review if contracts with service providers include provision for the safe disposal of human sewage, sludge, sewage water

Chapter 4 Integrated Pest Management (IPM)	4.5.1	All crops	All regions	Plant and Fertilizer Act, 2010 Act 803	Moderate	Possible	Administrators and smallholders sometimes fail to IPM plans	Farmers do not determine pest management steps based on the analysis of pest monitoring records	Farmers are not adequately trained to scout for pests and keep good inventory of pest monitoring records	Documented IPM plan, Risk analysis report, Qualification and work experience of expert/consultant/firm that carried out the assessment, implementation records, pest monitoring records, training records for producers, qualification of trainer, documented Management strategies/plan to prevent/mitigate impact. Interviews with producers.
Chapter 4 Integrated Pest Management (IPM)	4.5.3	All crops	All regions	Plant and Fertilizer Act, 2010 Act 803	Moderate	Possible	Administrators and smallholders sometimes fail to IPM plans	Farmers do not determine pest management steps based on the analysis of pest monitoring records	Farmers are not adequately trained to scout for pests and keep good inventory of pest monitoring records	Documented IPM plan, Risk analysis report, Qualification and work experience of expert/consultant/firm that carried out the assessment, implementation records, pest monitoring records, training records for producers, qualification of trainer, documented Management strategies/plan to prevent/mitigate impact. Interviews with producers.
Chapter 4 Integrated Pest Management (IPM)	4.5.4	All crops	All regions	Plant and Fertilizer Act, 2010 Act 803	Moderate	Possible	Administrators and smallholders sometimes fail to IPM plans	Farmers do not determine pest management steps based on the analysis of pest monitoring records	Farmers are not adequately trained to scout for pests and keep good inventory of pest monitoring records	Documented IPM plan, Risk analysis report, Qualification and work experience of expert/consultant/firm that carried out the assessment, implementation records, pest monitoring records, training records for producers, qualification of trainer, documented Management strategies/plan to prevent/mitigate impact. Interviews with producers.
Chapter 4 Agrochemicals Management	4.6.1	All crops	All regions	Pesticides Control and Management Act, 1996 Act 538 EPA Act, 1994 Act 490	Moderate	Possible	Farmers apply pesticides that are not legally registered and approved by Cocoa Research Institute of Ghana to control pests and weeds on their farms	Chemical handlers are untrained to apply pesticides based on MSDS and this can harm susceptible vegetation, wildlife and water supplies	Farmers often purchase pesticides from unlicensed sources which is widespread and regulating its use can be difficult	Training records for producers, approved pesticide list, prohibited list of pesticides, Company's Procedures on Health and Safety, Standard Operating Procedures, Interview with producers on formulations, toxicity, health risks, and other relevant MSDS information related to all substances to be applied, techniques for correct handling, correct PPE use, knowledge of licensed pesticides, etc
Chapter 4 Agrochemicals Management	4.6.7	All crops	All regions	No applicable law	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: •Check if aerial application is allowed in the country •Check what are the procedures for aerial application and the farm's measures to identify all risks of aerial application (example: damage to the environment, contamination of passers-by, contamination of people who may be using natural resources in the region where the chemicals are applied and other social impacts, contamination of local residents)
Chapter 4 Genetically Modified Organisms (GMOs)	4.3.1	All crops	All regions	Ghana Biosafety Act, 2011 Act 831 Plant and Fertilizer Act, 2010 Act 803	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: •Check the official/legalized/ reported crops that are GMO •Check whether certified crops are also listed in the list of GMO
Chapter 6 Environment, Wastewater Management	6.6.2	All crops	All regions	Environmental Sanitation Policy 2009	Minor	Unlikely	n/a	n/a	n/a	Document Review: •If portable toilets are used on site, review if contracts with service providers include provision for the safe disposal of human sewage, sludge/sewage water •If there is any discharge of sewage water into aquatic ecosystems, check the treatment methods for the water. •Verify test results meet legal wastewater quality parameters or the Rainforest Alliance wastewater parameters
Chapter 6 Environment, Protection of Wildlife and Biodiversity	6.4.5	All crops	All regions	Timber Resource Management Act 2002 Act 617 National Biodiversity Strategy for Ghana 2002 Forestry Commission Act 1999, Act 571 Forest and Wildlife Policy 2000	Minor	Unlikely	n/a	n/a	n/a	Document Review: •Check the map (Requirement 1.3.1) to see if erosion-prone areas have been identified •Check the Risk Assessment (Annex 53: Risk Assessment Tool) regarding erosion risk and any mitigation measures identified.
Chapter 4 Soil Fertility and Conservation	4.4.1	All crops	All regions	Plant and Fertilizer Act, 2010 Act 803	Moderate	Possible	Most smallholders do not have the technical knowledge of conducting soil assessment to understand the fertility.	This affects productivity of plant yields and over and under application of fertilizers	There is no documented assessment of the soil with a management plan	Review of a documented soil assessment report and management plan.
Chapter 4 Soil Fertility and Conservation	4.4.2	All crops	All regions	Plant and Fertilizer Act, 2010 Act 803	Moderate	Possible	Most smallholders do not have the technical knowledge of conducting soil assessment to understand the fertility.	This affects productivity of plant yields and over and under application of fertilizers	There is no documented assessment of the soil with a management plan	Review of a documented soil assessment report and management plan.
Chapter 4 Soil Fertility and Conservation	4.4.3	All crops	All regions	Plant and Fertilizer Act, 2010 Act 803	Moderate	Possible	Most smallholders do not have the technical knowledge of conducting soil assessment to understand the fertility.	This affects productivity of plant yields and over and under application of fertilizers	There is no documented assessment of the soil with a management plan	Review of a documented soil assessment report and management plan.
Chapter 4 Soil Fertility and Conservation	4.4.4	All crops	All regions	Plant and Fertilizer Act, 2010 Act 803	Moderate	Possible	Most smallholders do not have the technical knowledge of conducting soil assessment to understand the fertility.	This affects productivity of plant yields and over and under application of fertilizers	There is no documented assessment of the soil with a management plan	Review of a documented soil assessment report and management plan.
Chapter 6 Environment, Protection of Wildlife and Biodiversity	6.4.6	All crops	All regions	Timber Resource Management Act 2002 Act 617 National Biodiversity Strategy for Ghana 2002 Forestry Commission Act 1999, Act 571 Forest and Wildlife Policy 2000	Minor	Unlikely	n/a	n/a	n/a	Document Review: •Review land preparation and land-clearing procedures and records and check if fire is used for preparing/clearing land.
Chapter 6 Environment, Water Management and Conservation	6.5.1	All crops	All regions	National Interpretation of HCVP Toolkit, 2006; National Biodiversity Strategy for Ghana 2002	Minor	Unlikely	n/a	n/a	n/a	•Check the farm's Integrated Pest Document Review: •Check the applicable law for withdrawal of surface or groundwater, and that management is aware of what it requires
Chapter 6 Environment, Water Management and Conservation	6.5.2	All crops	All regions	National Interpretation of HCVP Toolkit, 2006; National Biodiversity Strategy for Ghana 2002	Minor	Unlikely	n/a	n/a	n/a	Document Review: •Check that farm management/ Group management has all required permits/licenses, (or has applied for the required permit) • Check the maximum water volumes allowed per permit/ license •Check water extraction and consumption records and verify if the amounts comply with any limits defined by law or the relevant permit/ license
Chapter 6 Environment, Water Management and Conservation	6.5.3	All crops	All regions	National Interpretation of HCVP Toolkit, 2006; National Biodiversity Strategy for Ghana 2002	Minor	Unlikely	n/a	n/a	n/a	Document Review: •Check irrigation and water distribution system maintenance records, including valve calibration (when applicable)
Chapter 4 Integrated Pest Management (IPM)	4.5.1	All crops	All regions	Plant and Fertilizer Act, 2010 Act 803	Moderate	Possible	Administrators and smallholders sometimes fail to IPM plans	Farmers do not determine pest management steps based on the analysis of pest monitoring records	Farmers are not adequately trained to scout for pests and keep good inventory of pest monitoring records	Documented IPM plan, Risk analysis report, Qualification and work experience of expert/consultant/firm that carried out the assessment, implementation records, pest monitoring records, training records for producers, qualification of trainer, documented Management strategies/plan to prevent/mitigate impact. Interviews with producers.
Chapter 4 Integrated Pest Management (IPM)	4.5.3	All crops	All regions	Plant and Fertilizer Act, 2010 Act 803	Moderate	Possible	Administrators and smallholders sometimes fail to IPM plans	Farmers do not determine pest management steps based on the analysis of pest monitoring records	Farmers are not adequately trained to scout for pests and keep good inventory of pest monitoring records	Documented IPM plan, Risk analysis report, Qualification and work experience of expert/consultant/firm that carried out the assessment, implementation records, pest monitoring records, training records for producers, qualification of trainer, documented Management strategies/plan to prevent/mitigate impact. Interviews with producers.
Chapter 4 Integrated Pest Management (IPM)	4.5.4	All crops	All regions	Plant and Fertilizer Act, 2010 Act 803	Moderate	Possible	Administrators and smallholders sometimes fail to IPM plans	Farmers do not determine pest management steps based on the analysis of pest monitoring records	Farmers are not adequately trained to scout for pests and keep good inventory of pest monitoring records	Documented IPM plan, Risk analysis report, Qualification and work experience of expert/consultant/firm that carried out the assessment, implementation records, pest monitoring records, training records for producers, qualification of trainer, documented Management strategies/plan to prevent/mitigate impact. Interviews with producers.

Chapter 4 Integrated Pest Management (IPM)	4.5.2	All crops	All regions	Plant and Fertilizer Act, 2010 Act 803	Moderate	Possible	Administrators and smallholders sometimes fail to IPM plans	Farmers do not determine pest management steps based on the analysis of pest monitoring records	Farmers are not adequately trained to scout for pests and keep good inventory of pest monitoring records	Documented IPM plan, Risk analysis report, Qualification and work experience of expert/consultant firm that carried out the assessment, implementation records, pest monitoring records, training records for producers, qualification of trainer, documented Management strategies/plan to prevent/mitigate impact. Interviews with producers.
Chapter 4 Agrochemical Management	4.6.2	All crops	All regions	Pesticides Control and Management Act, 1996 Act 528 EPA Act, 1994 Act 490	Significant	Likely	Training topics for pesticide handlers are often inadequate and are not conducted by competent professionals.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	The cost of engaging the services of a consultant/training expert may be expensive for some Group Administrators.	Training records for chemical handlers based on OHS Plan, Qualification of trainer/expert (certificate, work experience). The specific training topics must include: <ul style="list-style-type: none"> Occupational health topics specific to chemical handlers as defined in the Occupational Health and Safety Plan; Explanation of the names, formulations, toxicity, health risks, and other relevant MSDS information related to all substances to be applied; Techniques for correct handling of these substances; Correct use of PPE; Preventative measures for reducing possible damage to health and the environment caused by these substances; and Emergency procedures, first aid and medical attention for cases involving poisoning or undue contact with these substances. Observe if there is a first aid kit. Interview responsible person(s) who administer first aid to describe the emergency procedure and treatment for accidents and injuries, interview chemical handlers on response mechanism to receive first aid
Chapter 4 Agrochemical Management	4.6.6	All crops	All regions	Pesticides Control and Management Act, 1996 Act 528 EPA Act, 1994 Act 490	Significant	Likely	Training topics for pesticide handlers are often inadequate and are not conducted by competent professionals.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	The cost of engaging the services of a consultant/training expert may be expensive for some Group Administrators.	Training records for chemical handlers based on OHS Plan, Qualification of trainer/expert (certificate, work experience). The specific training topics must include: <ul style="list-style-type: none"> Occupational health topics specific to chemical handlers as defined in the Occupational Health and Safety Plan; Explanation of the names, formulations, toxicity, health risks, and other relevant MSDS information related to all substances to be applied; Techniques for correct handling of these substances; Correct use of PPE; Preventative measures for reducing possible damage to health and the environment caused by these substances; and Emergency procedures, first aid and medical attention for cases involving poisoning or undue contact with these substances. Observe if there is a first aid kit. Interview responsible person(s) who administer first aid to describe the emergency procedure and treatment for accidents and injuries, interview chemical handlers on response mechanism to receive first aid
Chapter 4 Agrochemical Management	4.6.6	All crops	All regions	Pesticides Control and Management Act, 1996 Act 528 EPA Act, 1994 Act 490	Significant	Likely	Training topics for pesticide handlers are often inadequate and are not conducted by competent professionals.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	The cost of engaging the services of a consultant/training expert may be expensive for some Group Administrators.	Training records for chemical handlers based on OHS Plan, Qualification of trainer/expert (certificate, work experience). The specific training topics must include: <ul style="list-style-type: none"> Occupational health topics specific to chemical handlers as defined in the Occupational Health and Safety Plan; Explanation of the names, formulations, toxicity, health risks, and other relevant MSDS information related to all substances to be applied; Techniques for correct handling of these substances; Correct use of PPE; Preventative measures for reducing possible damage to health and the environment caused by these substances; and Emergency procedures, first aid and medical attention for cases involving poisoning or undue contact with these substances. Observe if there is a first aid kit. Interview responsible person(s) who administer first aid to describe the emergency procedure and treatment for accidents and injuries, interview chemical handlers on response mechanism to receive first aid
Chapter 4 Agrochemical Management	4.6.10	All crops	All regions	Pesticides Control and Management Act, 1996 Act 528 EPA Act, 1994 Act 490	Significant	Likely	Training topics for pesticide handlers are often inadequate and are not conducted by competent professionals.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	The cost of engaging the services of a consultant/training expert may be expensive for some Group Administrators.	Training records for chemical handlers based on OHS Plan, Qualification of trainer/expert (certificate, work experience). The specific training topics must include: <ul style="list-style-type: none"> Occupational health topics specific to chemical handlers as defined in the Occupational Health and Safety Plan; Explanation of the names, formulations, toxicity, health risks, and other relevant MSDS information related to all substances to be applied; Techniques for correct handling of these substances; Correct use of PPE; Preventative measures for reducing possible damage to health and the environment caused by these substances; and Emergency procedures, first aid and medical attention for cases involving poisoning or undue contact with these substances. Observe if there is a first aid kit. Interview responsible person(s) who administer first aid to describe the emergency procedure and treatment for accidents and injuries, interview chemical handlers on response mechanism to receive first aid
Chapter 4 Agrochemical Management	4.6.11	All crops	All regions	Pesticides Control and Management Act, 1996 Act 528 EPA Act, 1994 Act 490	Significant	Likely	Training topics for pesticide handlers are often inadequate and are not conducted by competent professionals.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	The cost of engaging the services of a consultant/training expert may be expensive for some Group Administrators.	Training records for chemical handlers based on OHS Plan, Qualification of trainer/expert (certificate, work experience). The specific training topics must include: <ul style="list-style-type: none"> Occupational health topics specific to chemical handlers as defined in the Occupational Health and Safety Plan; Explanation of the names, formulations, toxicity, health risks, and other relevant MSDS information related to all substances to be applied; Techniques for correct handling of these substances; Correct use of PPE; Preventative measures for reducing possible damage to health and the environment caused by these substances; and Emergency procedures, first aid and medical attention for cases involving poisoning or undue contact with these substances. Observe if there is a first aid kit. Interview responsible person(s) who administer first aid to describe the emergency procedure and treatment for accidents and injuries, interview chemical handlers on response mechanism to receive first aid

Chapter 4 Agrochemical Management	4.6.12	All crops	All regions	Pesticides Control and Management Act, 1996 Act 528 EPA Act, 1994 Act 490	Moderate	Possible	Training topics for pesticide handlers are often inadequate and are not conducted by competent professionals.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	The cost of engaging the services of a consultant/training expert may be expensive for some Group Administrators.	Training records for chemical handlers based on OHS Plan, Qualification of trainer/expert (certificate, work experience). The specific training topics must include: <ul style="list-style-type: none"> • Occupational health topics specific to chemical handlers as defined in the Occupational Health and Safety Plan; • Explanation of the names, formulations, toxicity, health risks, and other relevant MSDS information related to all substances to be applied; • Techniques for correct handling of these substances; • Correct use of PPE; • Preventative measures for reducing possible damage to health and the environment caused by these substances; and • Emergency procedures, first aid and medical attention for cases involving poisoning or undue contact with
Chapter 4 Agrochemical Management	4.6.9	All crops	All regions	Pesticides Control and Management Act, 1996 Act 528 EPA Act, 1994 Act 490	Moderate	Possible	Training topics for pesticide handlers are often inadequate and are not conducted by competent professionals.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	The cost of engaging the services of a consultant/training expert may be expensive for some Group Administrators.	Training records for chemical handlers based on OHS Plan, Qualification of trainer/expert (certificate, work experience). The specific training topics must include: <ul style="list-style-type: none"> • Occupational health topics specific to chemical handlers as defined in the Occupational Health and Safety Plan; • Explanation of the names, formulations, toxicity, health risks, and other relevant MSDS information related to all substances to be applied; • Techniques for correct handling of these substances; • Correct use of PPE; • Preventative measures for reducing possible damage to health and the environment caused by these substances; and • Emergency procedures, first aid and medical attention for cases involving poisoning or undue contact with these substances. Observe if there is a first aid kit. Interview responsible person(s) who administer first aid to describe the emergency procedure and treatment for accidents and injuries, interview chemical handlers on response mechanism to receive first aid
Chapter 4 Agrochemical Management	4.6.9	All crops	All regions	Pesticides Control and Management Act, 1996 Act 528 EPA Act, 1994 Act 490	Significant	Likely	Training topics for pesticide handlers are often inadequate and are not conducted by competent professionals.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	The cost of engaging the services of a consultant/training expert may be expensive for some Group Administrators.	Training records for chemical handlers based on OHS Plan, Qualification of trainer/expert (certificate, work experience). The specific training topics must include: <ul style="list-style-type: none"> • Occupational health topics specific to chemical handlers as defined in the Occupational Health and Safety Plan; • Explanation of the names, formulations, toxicity, health risks, and other relevant MSDS information related to all substances to be applied; • Techniques for correct handling of these substances; • Correct use of PPE; • Preventative measures for reducing possible damage to health and the environment caused by these substances; and • Emergency procedures, first aid and medical attention for cases involving poisoning or undue contact with these substances. Observe if there is a first aid kit. Interview responsible person(s) who administer first aid to describe the emergency procedure and treatment for accidents and injuries, interview chemical handlers on response mechanism to receive first aid
Chapter 6 Environment, Waste Management	6.7.1	All crops	All regions	Water Resource Commission Act, 1996 Act 522 Water Use Regulations, 2001	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: <ul style="list-style-type: none"> • Check the management plan to verify activities related to waste management and any policies or procedures for waste management. Check they designate areas for Document Review.
Chapter 6 Environment, Waste Management	6.7.2	All crops	All regions	Water Resource Commission Act, 1996 Act 522 Water Use Regulations, 2001	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: <ul style="list-style-type: none"> • Check the farm's waste management plan or procedures. Verify if any waste is burnt it is only in appropriate incinerators
Chapter 6 Environment, Energy Efficiency	6.8.1	All crops	All regions	A 2011 Renewable Energy Act (Law 832)	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: <ul style="list-style-type: none"> • Check the energy efficiency plan / actions
Chapter 5 Assess-and-Address Child Labor, Forced Labor, Discrimination, Workplace Violence and Harassment	5.1.3	All crops	All regions	Criminal Code Act 1960, Act 29 National Labour Act, 2003 Act 651	Moderate	Possible	n/a	n/a	n/a	Document Review: <ul style="list-style-type: none"> • Review the procedures for monitoring risks of the four topics (child labor, forced labor, discrimination, and workplace violence and harassment) including the frequency of the monitoring (plan and schedule), the monitoring method (eg checklists, interviews etc). • Check the risk level for the country/crop against the RA maps for child labor and forced labor and that the level and frequency of monitoring is adequate for the risk level identified
Chapter 5 Assess-and-Address Child Labor, Forced Labor, Discrimination, Workplace Violence and Harassment	5.1.3	All crops	All regions	Criminal Code Act 1960, Act 29 National Labour Act, 2003 Act 651	Moderate	Possible	n/a	n/a	n/a	Document Review: <ul style="list-style-type: none"> • Review the procedures for monitoring risks of the four topics (child labor, forced labor, discrimination, and workplace violence and harassment) including the frequency of the monitoring (plan and schedule), the monitoring method (eg checklists, interviews etc). • Check the risk level for the country/crop against the RA maps for child labor and forced labor and that the level and frequency of monitoring is adequate for the risk level identified
Chapter 5 Assess-and-Address Child Labor, Forced Labor, Discrimination, Workplace Violence and Harassment	5.1.3	All crops	All regions	Criminal Code Act 1960, Act 29 National Labour Act, 2003 Act 651	Moderate	Possible	n/a	n/a	n/a	Document Review: <ul style="list-style-type: none"> • Review the procedures for monitoring risks of the four topics (child labor, forced labor, discrimination, and workplace violence and harassment) including the frequency of the monitoring (plan and schedule), the monitoring method (eg checklists, interviews etc). • Check the risk level for the country/crop against the RA maps for child labor and forced labor and that the level and frequency of monitoring is adequate for the risk level identified
Chapter 5 Assess-and-Address Child Labor, Forced Labor, Discrimination, Workplace Violence and Harassment	5.1.3	All crops	All regions	Children's Act, 1998 Act 560 Human Trafficking Act, 2005 Act 694 Criminal Code (Amendment) Act, 1998 Act 554 Child Right Regulation and Labour Act, 2005 Act 651 Domestic Violence Act, 2007 Act 732 National Program for the Elimination of Child Labour in Cocoa (NPELCLC) Hazardous Activity Framework (HAF)	Moderate	Possible	Child labour Remediation and Monitoring Protocols not widely enforced and implemented	To serve as an effective means to enable Group Administrators to identify and help other stakeholders to prevent and stop the incidence of Child Labour	Ghana Government has instituted several social protection measures and interventions including the supply of free text books, Capitation grant, School feeding program and Livelihood Empowerment Against Poverty (LEAP) to improve the welfare of children and their families but some the aforementioned initiatives are not far reaching	Audit Teams can include Social Protection experts to assist the Team to better evaluate incidence of Child Labour. During audit planning and field audit, Audit Team must identify and interview Stakeholders to seek their views and opinions on the prevalence of Child Labour
Chapter 5 Assess-and-Address Child Labor, Forced Labor, Discrimination, Workplace Violence and Harassment	5.1.1	All crops	All regions	Children's Act, 1998 Act 560 Human Trafficking Act, 2005 Act 694 Criminal Code (Amendment) Act, 1998 Act 554 Child Right Regulation and Labour Act, 2005 Act 651 Domestic Violence Act, 2007 Act 732 National Program for the Elimination of Child Labour in Cocoa (NPELCLC) Hazardous Activity Framework (HAF)	Moderate	Possible	Child labour Remediation and Monitoring Protocols not widely enforced and implemented	To serve as an effective means to enable Group Administrators to identify and help other stakeholders to prevent and stop the incidence of Child Labour	Ghana Government has instituted several social protection measures and interventions including the supply of free text books, Capitation grant, School feeding program and Livelihood Empowerment Against Poverty (LEAP) to improve the welfare of children and their families but some the aforementioned initiatives are not far reaching	Audit Teams can include Social Protection experts to assist the Team to better evaluate incidence of Child Labour. During audit planning and field audit, Audit Team must identify and interview Stakeholders to seek their views and opinions on the prevalence of Child Labour

Chapter 5 Assess-and-Address Child Labor, Forced Labor, Discrimination, Workplace Violence and Harassment	5.1.2	All crops	All regions	Children's Act, 1998 Act 560 Human Trafficking Act, 2005 Act 694 Criminal Code (Amendment) Act, 1998 Act 554 Child Right Regulation and Labour Act, 2005 Act 651 Domestic Violence Act, 2007 Act 732 National Program for the Elimination of Child Labour in Cocoa (NPECLC) Hazardous Activity Framework (HAF)	Moderate	Possible	Child labour Remediation and Monitoring Protocols not widely enforced and implemented	To serve as an effective means to enable Group Administrators to identify and help other stakeholders to prevent and stop the incidence of Child Labour	Ghana Government has instituted several social protection measures and interventions including the supply of free text books, Capitation grant, School feeding program and Livelihood Empowerment Against Poverty (LEAP) to improve the welfare of children and their families but some of the aforementioned initiatives are not far reaching	Audit Teams can include Social Protection experts to assist the Team to better evaluate incidence of Child Labour. During audit planning and field audit, Audit Team must identify and interview Stakeholders to seek their views and opinions on the prevalence of Child Labour
Chapter 5 Assess-and-Address Child Labor, Forced Labor, Discrimination, Workplace Violence and Harassment	5.1.4	All crops	All regions	Children's Act, 1998 Act 560 Human Trafficking Act, 2005 Act 694 Criminal Code (Amendment) Act, 1998 Act 554 Child Right Regulation and Labour Act, 2005 Act 651 Domestic Violence Act, 2007 Act 732 National Program for the Elimination of Child Labour in Cocoa (NPECLC) Hazardous Activity Framework (HAF)	Moderate	Possible	Child labour Remediation and Monitoring Protocols not widely enforced and implemented	To serve as an effective means to enable Group Administrators to identify and help other stakeholders to prevent and stop the incidence of Child Labour	Ghana Government has instituted several social protection measures and interventions including the supply of free text books, Capitation grant, School feeding program and Livelihood Empowerment Against Poverty (LEAP) to improve the welfare of children and their families but some of the aforementioned initiatives are not far reaching	Audit Teams can include Social Protection experts to assist the Team to better evaluate incidence of Child Labour. During audit planning and field audit, Audit Team must identify and interview Stakeholders to seek their views and opinions on the prevalence of Child Labour
Chapter 5 Freedom of Association and Collective Bargaining	5.2.1	All crops	All regions	No applicable law	Minor	Unlikely	n/a	n/a	n/a	Document Review: •Verify the national law or Collective Bargaining Agreement (CBA) for details on workers' rights to form unions or their workers' organization •Verify management's written policy about Freedom of Association (FOA)
Chapter 5 Freedom of Association and Collective Bargaining	5.2.2	All crops	All regions	No applicable law	Minor	Unlikely	n/a	n/a	n/a	Document Review: •Check any complaints documented by Management, by RA or by other stakeholders (eg the press/ NGOs) that indicate a risk of discrimination or retaliation against members of unions or workers organisations • Review the company policy and employment contracts for details on the grounds for termination to ensure that union related activities are not grounds for termination
Chapter 5 Freedom of Association and Collective Bargaining	5.2.3	All crops	All regions	No applicable law	Minor	Unlikely	n/a	n/a	n/a	Document Review: •Review the company policy about support provided to employees' to conduct their functions as union/workers' representatives •Cross-check dates of union meetings and activities against payment records for union/workers' representatives to check they received paid time off for these activities
Chapter 5 Wages and Contracts	5.3.3	All crops	All regions	National Labour Act, 2003 Act 651	Moderate	Possible	n/a	n/a	Even though there is no punitive measures in the Labour Law for not paying the required Minimum wage, the Group Administrator staff are paid above the National Daily minimum wage by their employers since most Groups audited are Private Companies who strictly enforce the Law to avoid bad press. On the other hand piece-rate workers involved in production and processing activities on-farm also receive negotiated wages above the National Daily minimum wage.	Document Review: •Check the applicable minimum wage or a Collective Bargaining Agreement •Check wage records and wage slips (or similar documents) as per the samples required under the Auditing Rules ensure wages paid to workers are equal or above the applicable minimum wage or CBA
Chapter 5 Wages and Contracts	5.3.4	All crops	All regions	National Labour Act, 2003 Act 651	Moderate	Possible	n/a	n/a	Even though there is no punitive measures in the Labour Law for not paying the required Minimum wage, the Group Administrator staff are paid above the National Daily minimum wage by their employers since most Groups audited are Private Companies who strictly enforce the Law to avoid bad press. On the other hand piece-rate workers involved in production and processing activities on-farm also receive negotiated wages above the National Daily minimum wage.	Document Review: •Check the applicable minimum wage or a Collective Bargaining Agreement •Check wage records and wage slips (or similar documents) as per the samples required under the Auditing Rules ensure wages paid to workers are equal or above the applicable minimum wage or CBA
Chapter 5 Wages and Contracts	5.3.5	All crops	All regions	National Labour Act, 2003 Act 651	Moderate	Possible	n/a	n/a	Even though there is no punitive measures in the Labour Law for not paying the required Minimum wage, the Group Administrator staff are paid above the National Daily minimum wage by their employers since most Groups audited are Private Companies who strictly enforce the Law to avoid bad press. On the other hand piece-rate workers involved in production and processing activities on-farm also receive negotiated wages above the National Daily minimum wage.	Document Review: •Check the Collective Bargaining Agreement or applicable laws for the types of deductions from wages allowed (including statutory deductions)
Chapter 5 Wages and Contracts	5.3.8	All crops	All regions	National Labour Act, 2003 Act 651	Moderate	Possible	n/a	n/a	Even though there is no punitive measures in the Labour Law for not paying the required Minimum wage, the Group Administrator staff are paid above the National Daily minimum wage by their employers since most Groups audited are Private Companies who strictly enforce the Law to avoid bad press. On the other hand piece-rate workers involved in production and processing activities on-farm also receive negotiated wages above the National Daily minimum wage.	Document Review: •Check the policy on the payment of wages. Check that pay rates, piece rates, production quotas, deductions and in-kind benefits are the same for all workers regardless of gender, age, ethnicity, color, religion, political opinion, nationality, social origin etc •Verify payment records for a sample of workers of different genders, ages, ethnicity etc to check that the same rates are paid for equal hours / quotas or types of work
Chapter 5 Wages and Contracts	5.3.1	All crops	All regions	National Labour Act, 2003 Act 651	Moderate	Possible	n/a	n/a	Even though there is no punitive measures in the Labour Law for not paying the required Minimum wage, the Group Administrator staff are paid above the National Daily minimum wage by their employers since most Groups audited are Private Companies who strictly enforce the Law to avoid bad press. On the other hand piece-rate workers involved in production and processing activities on-farm also receive negotiated wages above the National Daily minimum wage.	Document Review: •Check the workers' registry •Identify a sample of workers who are employed for more than 3 months and check their written contracts. Check that the contract is signed by both management and the worker, and that a copy is given to the worker

Chapter 1 Administration	1.2.5	All crops	All regions	National Labour Act, 2003 Act 651	Minor	Unlikely	In a few cases (less than 20% of the population) the citizens/residents have not registered the Voter ID Card/Birth Certificate in accordance with National Labour Laws.	Until the National Identification ID Card is completed, the various legal documents acceptable by Law remains widely unused	With a multiplicity of Legally registered and acceptable Documents which includes but not limited to the Voters ID card, Passport, Birth Certificate which is not widely used by majority of the underprivileged in society, the final confirmation means to verify legal age of a citizen can be contested	With the new National Identification Project being rolled out and to be fully implemented by end 2020, Auditors can rely on the National Identification Card as the main verification document to confirm the legal age of workers
Chapter 5 Wages and Contracts	5.3.2	All crops	All regions	National Labour Act, 2003 Act 651	Minor	Unlikely	n/a	n/a	n/a	Workers engaged by the Farm during production (weeding, pruning/land/or processing activities such as harvesting of ripe pods, are daily-rated workers who work for a limited time not period not lasting more than 6 months in the calendar year. Contract Workers engaged at the IMS Office are issued a fixed-term contract with similar benefits as permanent workers including the payment of SSNIT benefits and PAYE which are mandatory taxes under the Tax and Social Security laws of Ghana and Auditors can check to verify
Chapter 1 Grievance Mechanism	1.5.1	All crops	All regions	National Labour Act, 2003 Act 651	Minor	Unlikely	n/a	n/a	n/a	Group Administrator has a documented complaints and grievance procedure/mechanism and workers can freely fill out the Complaints forms and submit anonymously and receive feedback within a specific timeframe and Auditors can check during the audit
Chapter 5 Working Conditions	5.5.1	All crops	All regions	National Labour Act, 2003 Act 651	Minor	Unlikely	n/a	n/a	n/a	Document Review. •Check the applicable laws for legal limits on the working hours in a week or day (in case)
Chapter 5 Working Conditions	5.5.2	All crops	All regions	National Labour Act, 2003 Act 651	Moderate	Possible	Wrong interpretation of the specific provisions of the Ghana Labour Act, 2003, Act 651, Sub-Part II Section 35 on Paid overtime, Section 35 (1)	Even though overtime work is seldom in Groups, however, all overtime is voluntary and paid at 1.5 times the daily rate on weekdays and 2 times the daily rate on weekends but there are instances where some Farms make it mandatory in Workers' Contract.	The Ghana Labour Act has provisions grants an exemption that allow for Employers to engage employees to work beyond normal working hours but this may be misinterpreted to mean it is mandatory	Audit Teams can include Labour experts as Technical experts on Audit to assist in reviewing Workers' Contract and during the conduct of Interviews for Farms with large Workforce.
Chapter 5 Health and Safety	5.6.4	All crops	All regions	Community Water and Sanitation Agency Act 1998, Act 564	Moderate	Possible	Unhygienic water sources which has not been tested and approved as free from contamination for drinking	Some communities have been provided with boreholes by the various Assemblies. Other communities rely on portable water supplied by the Community Water and Sanitation Agency (State service provider) and in instances where communities are without these facilities, workers are trained to either boil or filter water before drinking. Most communities irrespective rely heavily on sachet water for drinking which is already certified by the Food and Drugs Authority of Ghana.	n/a	Auditors must check to confirm that workers in deprived communities have trained to either boil or filter water before drinking. Checks must also be made for sachet water for drinking that it has been certified by the Food and Drugs Authority of Ghana.
Chapter 5 Health and Safety	5.6.5	All crops	All regions	Community Water and Sanitation Agency Act 1998, Act 564	Moderate	Possible	Unhygienic water sources which has not been tested and approved as free from contamination for drinking	Some communities have been provided with boreholes by the various Assemblies. Other communities rely on portable water supplied by the Community Water and Sanitation Agency (State service provider) and in instances where communities are without these facilities, workers are trained to either boil or filter water before drinking. Most communities irrespective rely heavily on sachet water for drinking which is already certified by the Food and Drugs Authority of Ghana.	n/a	Auditors must check to confirm that workers in deprived communities have trained to either boil or filter water before drinking. Checks must also be made for sachet water for drinking that it has been certified by the Food and Drugs Authority of Ghana.
Chapter 5 Health and Safety	5.6.6	All crops	All regions	Community Water and Sanitation Agency Act 1998, Act 564	Moderate	Possible	Unhygienic water sources which has not been tested and approved as free from contamination for drinking	Some communities have been provided with boreholes by the various Assemblies. Other communities rely on portable water supplied by the Community Water and Sanitation Agency (State service provider) and in instances where communities are without these facilities, workers are trained to either boil or filter water before drinking. Most communities irrespective rely heavily on sachet water for drinking which is already certified by the Food and Drugs Authority of Ghana.	n/a	Auditors must check to confirm that workers in deprived communities have trained to either boil or filter water before drinking. Checks must also be made for sachet water for drinking that it has been certified by the Food and Drugs Authority of Ghana.
Chapter 1 Administration	1.2.5	All crops	All regions	Rent Act 220 of 1963	Negligible	Very Unlikely	N/A to smallholders. Housing is not provided by the Group Administrator to any member	n/a	n/a	Document Review. •Verify that there is a list of workers that includes their status (permanent,
Chapter 5 Housing and Living Conditions	5.7.1	All crops	All regions	Rent Act 220 of 1963	Negligible	Very Unlikely	N/A to smallholders. Housing is not provided by the Group Administrator to any member	n/a	n/a	Document Review. •Check if there is any applicable law about the requirement of providing houses to
Chapter 5 Housing and Living Conditions	5.7.2	All crops	All regions	Rent Act 220 of 1963	Negligible	Very Unlikely	N/A to smallholders. Housing is not provided by the Group Administrator to any member	n/a	n/a	Document Review. •Check the workers' registry and house census to verify the number of children
Chapter 5 Housing and Living Conditions	5.7.3	All crops	All regions	Rent Act 220 of 1963	Negligible	Very Unlikely	N/A to smallholders. Housing is not provided by the Group Administrator to any member	n/a	n/a	Document Review. •Check records on which workers and their family members are provided with housing
Chapter 5 Health and Safety	5.6.1	All crops	All regions	National Labour Act, 2003 Act 651	Moderate	Possible	OHS plans are not designed by competent professionals or organizations based on proper risk analysis conducted	Enables the GA to profile risk categories, put in place robust mitigation measures to reduce the impact or eliminate the risk, assign competent persons with responsibilities and evaluate the implementation outcomes	The Group Administrator may not designate a qualified OHS Officer to oversee the implementation of the OHS Plan	Documented OHS plan, Risk analysis report satisfying all parameters, Qualification and work experience of expert/consultant/firm that carried out the OHS assessment, medical reports, designated OHS Officer to ensure implementation, Implementation records, monitoring records, training records for producers, qualification of trainer, documented Management strategies/plan/procedures to prevent/mitigate impact. Interviews with producers.
Chapter 5 Health and Safety	5.6.8	All crops	All regions	National Labour Act, 2003 Act 651	Moderate	Possible	OHS plans are not designed by competent professionals or organizations based on proper risk analysis conducted	Enables the GA to profile risk categories, put in place robust mitigation measures to reduce the impact or eliminate the risk, assign competent persons with responsibilities and evaluate the implementation outcomes	The Group Administrator may not designate a qualified OHS Officer to oversee the implementation of the OHS Plan	Documented OHS plan, Risk analysis report satisfying all parameters, Qualification and work experience of expert/consultant/firm that carried out the OHS assessment, medical reports, designated OHS Officer to ensure implementation, Implementation records, monitoring records, training records for producers, qualification of trainer, documented Management strategies/plan/procedures to prevent/mitigate impact. Interviews with producers.
Chapter 5 Health and Safety	5.6.10	All crops	All regions	National Labour Act, 2003 Act 651	Moderate	Possible	OHS plans are not designed by competent professionals or organizations based on proper risk analysis conducted	Enables the GA to profile risk categories, put in place robust mitigation measures to reduce the impact or eliminate the risk, assign competent persons with responsibilities and evaluate the implementation outcomes	The Group Administrator may not designate a qualified OHS Officer to oversee the implementation of the OHS Plan	Documented OHS plan, Risk analysis report satisfying all parameters, Qualification and work experience of expert/consultant/firm that carried out the OHS assessment, medical reports, designated OHS Officer to ensure implementation, Implementation records, monitoring records, training records for producers, qualification of trainer, documented Management strategies/plan/procedures to prevent/mitigate impact. Interviews with producers.
Chapter 5 Health and Safety	5.6.12	All crops	All regions	National Labour Act, 2003 Act 651	Moderate	Possible	OHS plans are not designed by competent professionals or organizations based on proper risk analysis conducted	Enables the GA to profile risk categories, put in place robust mitigation measures to reduce the impact or eliminate the risk, assign competent persons with responsibilities and evaluate the implementation outcomes	The Group Administrator may not designate a qualified OHS Officer to oversee the implementation of the OHS Plan	Documented OHS plan, Risk analysis report satisfying all parameters, Qualification and work experience of expert/consultant/firm that carried out the OHS assessment, medical reports, designated OHS Officer to ensure implementation, Implementation records, monitoring records, training records for producers, qualification of trainer, documented Management strategies/plan/procedures to prevent/mitigate impact. Interviews with producers.
Chapter 5 Health and Safety	5.6.15	All crops	All regions	National Labour Act, 2003 Act 651	Moderate	Possible	OHS plans are not designed by competent professionals or organizations based on proper risk analysis conducted	Enables the GA to profile risk categories, put in place robust mitigation measures to reduce the impact or eliminate the risk, assign competent persons with responsibilities and evaluate the implementation outcomes	The Group Administrator may not designate a qualified OHS Officer to oversee the implementation of the OHS Plan	Documented OHS plan, Risk analysis report satisfying all parameters, Qualification and work experience of expert/consultant/firm that carried out the OHS assessment, medical reports, designated OHS Officer to ensure implementation, Implementation records, monitoring records, training records for producers, qualification of trainer, documented Management strategies/plan/procedures to prevent/mitigate impact. Interviews with producers.

Chapter 4 Agrochemical Management	4.6.3	All crops	All regions	National Labour Act, 2003 Act 651	Significant	Likely	Workers who mix, handle or come into contact with pesticides and fertilizers do not wear appropriate and functional full set of Personal Protective Equipment.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	Group administrators inability to have a robust monitoring and evaluation system in place to monitor inventory of existing supplies of PPEs, their effective use by designated persons, and a qualified person to continuously retrain workers on the roles to ensure full compliance	Documented Risk analysis of PPE classification, inventory of PPEs purchased, distribution list, receipt list. Training records of producers on MSDS, safety instructions, re-entry procedures. Carry out witness audit of applicators to demonstrate how to wear appropriate PPEs. Observe if PPEs used is based on risk of exposure.
Chapter 4 Agrochemical Management	4.6.5	All crops	All regions	National Labour Act, 2003 Act 651	Significant	Likely	Workers who mix, handle or come into contact with pesticides and fertilizers do not wear appropriate and functional full set of Personal Protective Equipment.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	Group administrators inability to have a robust monitoring and evaluation system in place to monitor inventory of existing supplies of PPEs, their effective use by designated persons, and a qualified person to continuously retrain workers on the roles to ensure full compliance	Documented Risk analysis of PPE classification, inventory of PPEs purchased, distribution list, receipt list. Training records of producers on MSDS, safety instructions, re-entry procedures. Carry out witness audit of applicators to demonstrate how to wear appropriate PPEs. Observe if PPEs used is based on risk of exposure.
Chapter 5 Health and Safety	5.6.9	All crops	All regions	National Labour Act, 2003 Act 651	Significant	Likely	Workers who mix, handle or come into contact with pesticides and fertilizers do not wear appropriate and functional full set of Personal Protective Equipment.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	Group administrators inability to have a robust monitoring and evaluation system in place to monitor inventory of existing supplies of PPEs, their effective use by designated persons, and a qualified person to continuously retrain workers on the roles to ensure full compliance	Documented Risk analysis of PPE classification, inventory of PPEs purchased, distribution list, receipt list. Training records of producers on MSDS, safety instructions, re-entry procedures. Carry out witness audit of applicators to demonstrate how to wear appropriate PPEs. Observe if PPEs used is based on risk of exposure.
Chapter 4 Agrochemical Management	4.6.3	All crops	All regions	National Labour Act, 2003 Act 651	Significant	Likely	Training topics for pesticide handlers are often inadequate and are not conducted by competent professionals.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	The cost of engaging the services of a consultant/training expert may be expensive for some Group Administrators.	Training records for chemical handlers based on OHS Plan, Qualification of trainer/expert (certificate, work experience). The specific training topics must include: <ul style="list-style-type: none"> • Occupational health topics specific to chemical handlers as defined in the Occupational Health and Safety Plan; • Explanation of the names, formulations, toxicity, health risks, and other relevant MSDS information related to all substances to be applied; • Techniques for correct handling of these substances; • Correct use of PPE; • Preventative measures for reducing possible damage to health and the environment caused by these substances; and • Emergency procedures, first aid and medical attention for cases involving poisoning or undue contact with these substances. Observe if there is a first aid kit. Interview responsible person(s) who administer first aid to describe the emergency procedure and treatment for accidents and injuries, interview chemical handlers on response mechanism to receive first aid
Chapter 4 Agrochemical Management	4.6.4	All crops	All regions	National Labour Act, 2003 Act 651	Significant	Likely	There are no bathrooms or washing and changing areas on or close to the farms and Chemical handlers wear the PPEs at home and after spraying activities, return to wash and store the PPE kits in their homes	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	Financial constraint by the Group administrators to provide some finances to support or assist producers construct bathroom and changing facilities. However, since there is an enabling legislation to protect workers against such hazards, Group administrator will have to ensure compliance even though it may be an operational challenge.	Observe/inspect condition of bathrooms and changing room facilities in relation to number of chemical handlers. Interview chemical handlers, check cleaning records, inspect PPEs storage area.
Chapter 5 Working Conditions	5.5.3	All crops	All regions	National Labour Act, 2003 Act 651	Minor	Unlikely	n/a	Pregnant, nursing and lactating mothers who are producers (farm owners) always engage the services of sharecroppers, rely on Group spraying gangs or the Government mass sprayers to carry out spraying activities on their behalf. In the Group administrator facility, women mainly work as administrative staff (low risk work) or documentation officers. During harvesting operations, pregnant, nursing and lactating mothers engaged as farmhands are not made to carry heavy loads. So the risk is very low.	n/a	Document Review: <ul style="list-style-type: none"> •Check applicable laws on the eligibility of paid maternity leave to check if the law provides more time off or benefits/ protections than the Requirement. NB if in the applicable law, temporary workers are also eligible for paid maternity leave, the law applies
Chapter 5 Health and Safety	5.6.11	All crops	All regions	National Labour Act, 2003 Act 651	Minor	Unlikely	n/a	Pregnant, nursing and lactating mothers who are producers (farm owners) always engage the services of sharecroppers, rely on Group spraying gangs or the Government mass sprayers to carry out spraying activities on their behalf. In the Group administrator facility, women mainly work as administrative staff (low risk work) or documentation officers. During harvesting operations, pregnant, nursing and lactating mothers engaged as farmhands are not made to carry heavy loads. So the risk is very low.	n/a	Document Review: <ul style="list-style-type: none"> •Check management policies on the assignment of tasks to Female workers who are pregnant, nursing, or have recently given birth. •Verify that there is no requirement for female workers to take pregnancy tests and these are not requested
Chapter 5 Communities	5.8.2	All crops	All regions	Lands Commission Act 2008, Act 767 Land Title Registration Act 1986 PNDC Law 152 1992 Constitution of Ghana Administration of Land Act 1962, Act 123 Land Registry Act 1962, Act 122	Moderate	Possible	Land use rights is mostly determined by either ownership, inheritance of cocoa farmlands or leases (harvests are shared 1/3 for the lessor and 2/3 for the lessee) however there is no documentation to support the transactions but rather the reliance on trust and goodwill	Boundary demarcation disputes can arise when family members sell off portions of land and actual production area becomes a subject matter for contention	Since there are enabling legislations, Group administrators must ensure that farmers secure land title deeds to their lands.	Conflict resolution procedure, Complaints and grievance procedure, complaints and appeals forms, offence files, documented lease agreement, land title certificate, interview with Chief/Elders, District Assembly Staff, Commission on Human Rights and Administrative Justice, Community members.
Chapter 5 Communities	5.8.1	All crops	All regions	Lands Commission Act 2008, Act 767 Land Title Registration Act 1986 PNDC Law 152 1992 Constitution of Ghana Administration of Land Act 1962, Act 123 Land Registry Act 1962, Act 122	Minor	Unlikely	n/a to smallholders	n/a	n/a	Document Review: <ul style="list-style-type: none"> •Check management's policy on Free, Prior and Informed Consent processes including how they decide when an FPIC process is required
Chapter 5 Wages and Contracts	5.3.6	All crops	All regions	National Labour Act, 2003 Act 651	Minor	Unlikely	n/a to smallholders	n/a	n/a	Document Review: <ul style="list-style-type: none"> •Check documentation of payments to workers to check that rates are regular
Chapter 5 Wages and Contracts	5.3.7	All crops	All regions	National Labour Act, 2003 Act 651	Minor	Unlikely	n/a to smallholders	n/a	n/a	Document Review: <ul style="list-style-type: none"> •Check the record of payments to workers kept by the group member (a sample of) •Verify that management has identified
Chapter 1 Administration	1.2.7	All crops	All regions	No applicable law	Negligible	Very Unlikely	n/a	n/a	n/a	Document Review: <ul style="list-style-type: none"> •Verify that management has identified
Chapter 5 Health and Safety	5.6.7	All crops	All regions	Rent Act 220 of 1963, National Labour Act, 2003 Act 651	Negligible	Very Unlikely	N/A to smallholders. Housing is not provided by the Group Administrator to any member	n/a	n/a	Document Review: <ul style="list-style-type: none"> •If relevant, Check farm maps and facility maps to see if toilets and washing areas are available
Chapter 5 Housing and Living Conditions	5.7.1	All crops	All regions	Rent Act 220 of 1963, National Labour Act, 2003 Act 651	Negligible	Very Unlikely	N/A to smallholders. Housing is not provided by the Group Administrator to any member	n/a	n/a	Document Review: <ul style="list-style-type: none"> •Check if there is any applicable law about the requirement of providing houses to workers, and whether it is stricter than the Document review
Chapter 5 Living Wage	5.4.1	All crops	All regions	National Labour Act, 2003 Act 651	Minor	Unlikely	n/a to smallholders	n/a	n/a	Document Review:
Chapter 5 Living Wage	5.4.2	All crops	All regions	National Labour Act, 2003 Act 651	Minor	Unlikely	n/a to smallholders	n/a	n/a	Document Review: <ul style="list-style-type: none"> •Check if Rainforest Alliance Salary Matrix
Chapter 4 Agrochemical Management	4.6.5	All crops	All regions	National Labour Act, 2003 Act 651	Significant	Likely	Workers who mix, handle or come into contact with pesticides and fertilizers do not wear appropriate and functional full set of Personal Protective Equipment.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	Group administrators inability to have a robust monitoring and evaluation system in place to monitor inventory of existing supplies of PPEs, their effective use by designated persons, and a qualified person to continuously retrain workers on the roles to ensure full compliance	Documented Risk analysis of PPE classification, inventory of PPEs purchased, distribution list, receipt list. Training records of producers on MSDS, safety instructions, re-entry procedures. Carry out witness audit of applicators to demonstrate how to wear appropriate PPEs. Observe if PPEs used is based on risk of exposure.

Chapter 5 Health and Safety	5.6.16	All crops	All regions	Pesticides Control and Management Act, 1996 Act 528 EPA Act, 1994 Act 490 and National Labour Act, 2003 Act 651	Moderate	Possible	Training topics for pesticide handlers are often inadequate and are not conducted by competent professionals.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	The cost of engaging the services of a consultant/training expert may be expensive for some Group Administrators.	Training records for chemical handlers based on OHS Plan, Qualification of trainer/expert (certificates, work experience). The specific training topics must include: <ul style="list-style-type: none"> Occupational health topics specific to chemical handlers as defined in the Occupational Health and Safety Plan; Explanation of the names, formulations, toxicity, health risks, and other relevant MSDS information related to all substances to be applied; Techniques for correct handling of these substances; Correct use of PPE; Preventative measures for reducing
Chapter 4 Agrochemical Management	4.6.11	All crops	All regions	Pesticides Control and Management Act, 1996 Act 528 EPA Act, 1994 Act 490	Significant	Likely	Training topics for pesticide handlers are often inadequate and are not conducted by competent professionals.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	The cost of engaging the services of a consultant/training expert may be expensive for some Group Administrators.	Training records for chemical handlers based on OHS Plan, Qualification of trainer/expert (certificates, work experience). The specific training topics must include: <ul style="list-style-type: none"> Occupational health topics specific to chemical handlers as defined in the Occupational Health and Safety Plan; Explanation of the names, formulations, toxicity, health risks, and other relevant MSDS information related to all substances to be applied; Techniques for correct handling of these substances; Correct use of PPE;
Chapter 5 Health and Safety	5.6.13	All crops	All regions	National Labour Act, 2003 Act 651	Minor	Unlikely	n/a to smallholders	n/a	n/a	Document Review: <ul style="list-style-type: none"> Check that an accident and emergency procedure is in place
Chapter 5 Health and Safety	5.6.14	All crops	All regions	National Labour Act, 2003 Act 651	Minor	Unlikely	n/a to smallholders	n/a	n/a	Observation: <ul style="list-style-type: none"> Check the facilities provided for workers in fields, processing and storage for their lunch break
Chapter 5 Health and Safety	5.6.2	All crops	All regions	National Labour Act, 2003 Act 651	Minor	Unlikely	n/a to smallholders	n/a	n/a	Document Review: <ul style="list-style-type: none"> Check policies and procedures for the provision of first aid and emergency health services
Chapter 5 Health and Safety	5.6.3	All crops	All regions	National Labour Act, 2003 Act 651	Minor	Unlikely	n/a to smallholders	n/a	n/a	Interview: <ul style="list-style-type: none"> Interview group members and workers to find out if they know where to go in case of an emergency
Chapter 5 Health and Safety	5.6.16	All crops	All regions	National Labour Act, 2003 Act 651	Minor	Unlikely	n/a to smallholders	n/a	n/a	Document Review: <ul style="list-style-type: none"> Check the list of workers applying agrochemicals
Chapter 4 Agrochemical Management	4.6.11	All crops	All regions	Pesticides Control and Management Act, 1996 Act 528 EPA Act, 1994 Act 490	Significant	Likely	Training topics for pesticide handlers are often inadequate and are not conducted by competent professionals.	Exposure to chemical residue poses a direct threat to the health and wellbeing of workers and their families as it can lead to chronic illnesses, poisoning etc.	The cost of engaging the services of a consultant/training expert may be expensive for some Group Administrators.	Training records for chemical handlers based on OHS Plan, Qualification of trainer/expert (certificates, work experience). The specific training topics must include: <ul style="list-style-type: none"> Occupational health topics specific to chemical handlers as defined in the Occupational Health and Safety Plan; Explanation of the names, formulations, toxicity, health risks, and other relevant MSDS information related to all substances to be applied; Techniques for correct handling of these substances; Correct use of PPE; Preventative measures for reducing possible damage to health and the environment caused by these substances; and
Chapter 5 Health and Safety	5.6.7	All crops	All regions	Rent Act 220 of 1963, National Labour Act, 2003 Act 651	Negligible	Very Unlikely	N/A to smallholders. Housing is not provided by the Group Administrator to any member	n/a	n/a	Document Review: <ul style="list-style-type: none"> If relevant, Check farm maps and facility maps to see if toilets and washing areas are indicated
Polylons are available for all farm units of 4ha and above. Geolocation points are available for all other farm units.	EUDR1	Cocoa, coffee,	Cocoa and coffee growing area	Data Protection Act, 2012 (Act 843), The Farm lands (Protection) Act 1962 Act 107 Survey Act 1962, Act 127	Significant	Likely	1. There is no standardized device and software for GPS or/and polygon mapping. 2. Low technical know-how on taking GPS/polygon maps by implementers 3. Low technical know-how on validating GPS/Polygon maps by implementers.	Leads to inaccurate determination of total farm areas, production areas and potential destruction of the natural ecosystem. The exact boundaries of each farm plot may not be accurate. Leads to inaccurate determination of farm materials or inputs such as fertilizers and agrochemicals by producers.	Its difficult to determine the actual large farm among the farm units since farmers with multiple farm units are not aware of the sizes of their farms.	Check for the availability of geolocation data in GMR and in the member list for all the registered farmers. Check whether the largest farm unit has the geolocation same as what auditors map. RA has provided Guidance Document F.
Geolocation data for both points and polygons must have 6 decimals.	EUDR2	Cocoa, coffee,	Cocoa and coffee growing area	Data Protection Act, 2012 (Act 843), The Farm lands (Protection) Act 1962, Act 107 Survey Act 1962, Act 127	Significant	Likely	1. There is no standardized device and software for GPS or/and polygon mapping. 2. Low technical know-how on taking GPS/polygon maps by implementers 3. not be accurate. Low technical know-how on validating GPS/Polygon maps by implementers.	Leads to inaccurate determination of total farm areas, production areas and potential destruction of the natural ecosystem. The exact boundaries of each farm plot may not be accurate. Leads to inaccurate determination of farm materials or inputs such as fertilizers and agrochemicals by producers.	Its difficult to determine the actual large farm among the farm units since farmers with multiple farm units are not aware of the sizes of their farms.	Check for the availability of geolocation data in GMR and in the member list for all the registered farmers. Check whether the largest farm unit has the geolocation same as what auditors map. RA has provided Guidance Document F.
Management implements measures to prevent and address potential cases of corruption (including bribery and extortion), fraud and nepotism by: - A written public statement that is communicated to group members/workers and supply chain partners- Training of management and workers/group members to raise awareness of possible forms, at least annually - Taking measures to avoid, and to remediate cases	EUDR3	Cocoa, coffee,	Cocoa and coffee growing area	Public Procurement Act, Financial Administration Act, Internal Audit Agency Act, Criminal Code 1960, UN Convention Against Corruption (UNCAC), National Anti-Corruption Action Plan (NACAP), Ghana Asset Disclosure Act	Significant	Likely	lack of money	we cannot trust everything he has put in place as an activity.	document authentication difficulties	-stakeholder interview -verification of contracts between the CH and the service providers
Management shows evidence of payment of all applicable fees, royalties, taxes and other charges as prescribed by local laws and regulations.	EUDR4	Cocoa, coffee,	Cocoa and coffee growing area	Corporate Tax Law, Fees and Charges (Miscellaneous Provisions) Act, 2018 (Act 983), National Labour Act, 2003 Act 651, Ghana Cocoa Board Law & Cocoa Industry Regulation, Purchase, inspection, grading, sealing, certification, export & sale	Significant	Likely	lack of money	We run the risk of certifying a CH which does not comply with the laws of the country	knowledge of the taxes applicable to different types of CH	verification of proof of payment

Certification body:	BUREAU VERITAS CÔTE D'IVOIRE	Date reviewed:	
Country:	CAMEROON	Reviewed by:	
Date submitted:	16/04/2024	Approved by:	
Contact person:	AKA MARIE BERTHE	Date approved:	

(Risk = risks to non-compliance)

Compliance topic	Related standard requirement	Risks related to specific...			Severity	Likelihood	What are the root causes	Why is this risk so important?	Interpretation challenges	Auditing technique to detect & reduce risks
		Crop(s)	Region(s)	Laws						
Management capacity	1.1.1	Cocoa, coffee, Banana,	All growing area		Significant	Likely	<ul style="list-style-type: none"> - Each member is not aware of the importance of his task - The leaders of the group are not always interested in sustainability program - The low level of the group responsible for the statement that does not matter to the mark certification program - The applicable laws are not identified and known - Financial resources not allocated or insufficient - Shares of the group not based on any management plan or not updated management plan. 	Negative impact on standard implementation Incomplete actions	Criteria to define the competence are unclear All documents are in place but the system don't run	<ul style="list-style-type: none"> - RA provided a Management Capacity Assessment Tool - Check the list of personnel responsible for the implementation of the Management System - Check the financial resources for the implementation of the management plan (organization team and the functions of the staff, the ADG, people in charge of the transformation and storage processes) - Check the regular assessments made to measure compliance with this standard - Check the applicable laws defined, documented and understood by the group
Services providers	1.2.2	Cocoa, coffee, Banana, mangoes, pineapple	All regions		Moderate	Possible	<ul style="list-style-type: none"> - Service providers are recruited without a selection and evaluation mechanism 	The service provider can provide services without meeting the requirements of the standard which will ultimately be the responsibility of the certified group	The specifications of the service providers are not clear	<ul style="list-style-type: none"> - Interview with the group administrator on the recruitment method of service providers and their evaluation - Check the procedure on the selection mechanism, - Check the report and the evaluation result - Observe the operating service provider if necessary
Group member registry	1.2.4	Cocoa, coffee	Cocoa and coffee growing area	Acte uniforme OHADA du 15 décembre 2010-Droit des sociétés coopératives	Significant	Very Likely	<ul style="list-style-type: none"> - Internal inspections were not carried out completely, - Internal inspection reports are not filed in correctly, - Group administrator is not competent, - Insufficient work equipment (GPS, rolling stock) - The register may contain fictitious members - The registry can contain members who are registered with several certified groups 	(Traceability problem) Possible mixture of cocoa, impossible to control production potential; possibility of situation of the plantation in a protected area (HVC destruction)	The sometimes high number of producer files put in place; Unavailability of GPS, Law respecting unclarified register The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups The declaration of areas during audits and almost always differs from the areas in the registers."	<ul style="list-style-type: none"> - RA provided Guidance Document C - Checks of internal inspection sheets, verifications of the membership register, cocoa delivery, interview with some producers, internal inspectors, the storekeeper or purchasing manager, - Delimitation of plots
Correct Geolocation data and farms polygons	1.1.11 & 1.2.12 & 1.2.13	Cocoa, coffee	Cocoa and coffee growing area		Severe	Very Likely	<ul style="list-style-type: none"> - The CH's don't know how to use technology, how to use application for checking 	Makes it difficult to confirm that there is no certified culture in projected area. Aed to get the actual farm size.	The sometimes high number of producer files put in place; Unavailability of GPS, The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups The declaration of areas during audits and almost always differs from the areas in the registers."	<ul style="list-style-type: none"> - Previous analysis of GPS coordinates and different image sources - Equip auditors for the verification of a determinate number of GPS coordinates and farms size - RA provided Guidance Document F
Risk assessment	1.3.1 & 1.3.2	Cocoa, coffee, Banana,	All growing area	Loi N°2004/025 Du 30 Dec 2004 Modifiant et complétant certaines dispositions de la Loi N°95/11 du 27 Juillet 1995 portant organisation du commerce du cacao et du café Décret N° 2005/1212 /PM Du 27 Avril 2005 Réglementant le conditionnement et la commercialisation des fèves de cacao produit en République du Cameroun Décret N° 2005/1213 /PM Du 27 Avril 2005 Réglementant le conditionnement et la commercialisation des fèves de café produit en	Significant	Likely	<ul style="list-style-type: none"> - The unqualified risk assessor, the evaluation is non-participatory; - All the steps of the risk assessment were not followed - The high cost of an ESA - Falsification of the risk assessment report 	<ul style="list-style-type: none"> - Possibility of non-compliance with the requirements of the standard - Possibility of destruction of natural ecosystems and HCVs; - Failure to respect the rights of neighboring populations; - Conflicts with local populations 	<ul style="list-style-type: none"> - Knowledge of the realities of the certified group's business area - Knowledge of and access to all national legislation; - Difference between the criteria of the standard and the requirements of the legislation; measures to mitigate negative impacts. 	<ul style="list-style-type: none"> - RA provided Annex 3 and Guidance Document B - Know the realities of the certified group's business area - Verification of the competence of the evaluators; - Interviews with the participants of the evaluation; - Examination of minutes and attendance lists.
Quality of internal inspection	1.4.2	Cocoa, coffee	Cocoa and coffee growing area		Significant	Very Likely	<ul style="list-style-type: none"> - Lack of money to equip and pay internal inspectors - Internal inspectors have others occupations than the group activities - Difficulties to find qualified persons in villages 	<ul style="list-style-type: none"> - Insufficient monitoring of farmers. - Incomplete understanding of the requirement by the member 	The groups do not have the same farmers spatial distribution - what are minimum qualifications and competencies for internal inspectors?	<ul style="list-style-type: none"> - RA fixed a ratio between internal inspections and farms - Check if internal inspectors can read and write - Check if they went to school - Confirm with farmers if inspectors really conduct activities and give information concerning the standard
A grievance mecanism (non-communication and non-appropriation of complaint mechanisms)	1.5.1	Cocoa, coffee, Banana, mangoes, pineapple	All growing area	- Loi N°2015-532 du 14 Septembre 2015 portant CODE DU TRAVAIL	Moderate	Possible	<ul style="list-style-type: none"> - Familiarity between group and worker and between group and community - fear of reprisals from other members of The community or group - Lack of real complaints and grievances mechanism - Lack of communication of The mechanism - Ignorance of the importance of The mechanism by workers or communities. - Ignorance of rights 	<ul style="list-style-type: none"> - Abuse - Favoritism - Ineffective treatment of concerns and / or disputes within the group 	<ul style="list-style-type: none"> - How to manage a problem that neednot to be treat by the complaint protocols according the auditor but not been? - How to decide that a problem was well treated? 	<ul style="list-style-type: none"> - Interview techniques to detect problems that merit complaint handling - RA developed annexe 4
Gender equality	1.6.1	Cocoa, coffee, Banana, mangoes, pineapple	All growing area		Severe	Very Likely	<ul style="list-style-type: none"> - Women are just considered in food crops. - Some persons don't know that gender concern men also 	<ul style="list-style-type: none"> - Women are less trained - less monitored - Incomplete understanding of the requirement by the member - Sometimes men are forgot in activities to promote gender equality 	The standard do not specify clear action to promote gender equality. - What can be considered as sufficient for gender equality promotion?	<ul style="list-style-type: none"> - RA provided guidance document G - Check if interviews and documented proofs what was done for men and women according to their needs
Mixing of certify and non certify product	2.1	Cocoa, coffee	growing area	Loi N°2004/025 Du 30 Dec 2004 Modifiant et complétant certaines dispositions de la Loi N°95/11 du 27 Juillet 1995 portant organisation du commerce du cacao et du café. Décret N° 2005/1212 /PM Du 27 Avril 2005 Réglementant le conditionnement et la commercialisation des fèves de cacao produit en République du Cameroun. Décret N° 2005/1213 /PM Du 27 Avril 2005 Réglementant le conditionnement et la commercialisation des fèves de café produit en	Significant	Likely	<ul style="list-style-type: none"> - Insufficiency of the traceability system set up to manage the flow of certified product - Insufficient training of actors for the registration of the flow of certified product. - Fraud - The host for the premium of certain worry actors - The lack of rigor or the tolerance of the auditors in the control of the traceability of the certified product. - Overestimation of yields - Non existence of members - Inaccurate value of areas - Double registration of plots - Partial sale - Risk of sale of non-certified product - Non-cooperation of state bodies 	<ul style="list-style-type: none"> - Integrity of certify product - To prevent the product sold from being superior to the product harvested and to avoid all links of risks of mixing. - Attention of the media and denunciation of the media on fraudulent acts in the traceability process 	<ul style="list-style-type: none"> - Lack of credibility of acreage data and estimation of farm yields - the non-conservation of traceability documents by producers and their ease of forgetting sales information - Inability to use information from the traceability system in certification and the national system (SDOBE). 	<ul style="list-style-type: none"> - RA provided guidance document H - Interviews with producers and actors of the traceability system - Visits to farms - Analysis of the traceability system put in place (Traceability manual and documents relating to traceability, Register) - Average yields - Mapping - Previous deliveries, and forecast

Equipment used to define the weight	2.1.9	Cocoa, coffee	growing area	Décret N°2019-327 du 10 avril 2019 portant approbation de la délégation de service public de service de métrologie légale portant sur les vérifications primitives et périodiques d'appareil et instruments de mesure	Severe	Very Likely	A national law designated only one structure for calibration of equipment used to define the weight. This structure don't take annually calibration as strict requirement	Large differences in weight between producers, cooperatives and exporters can result from this lack of calibration. The producer will always be the loser	Compliance with RA standard or national law?	- Check weigh difference if it is significant - Check if the group tests its scales itself at regular intervals - Give a non compliance if the farmer is the loser
Living income	3.1.2	Cocoa, coffee, Banana, mangoes, pineapple	All growing area		Severe	Likely	- Living income is not define in the country - Living income is not well known by actors	without reference, groups will not know how to approach this requirement		- RA developed the annex 5 - Knowledge of living income for each actor
Sustainability Differential	3.2.1	All crops	All growing area		Moderate	Possible	- Fraud	- Producers work hard to be certified but do not receive their Sustainability Differential - No improvement in the living conditions of farmers	- Most producers do not know the certified quantities sold - It is difficult to reconcile the amounts received because the Sustainability Differential is sometimes paid quarterly - Sometimes during audits Sustainability Differential are not yet been paid	Possibility to fix a rate to producer in term of percentage that lead to non conformity
Genetically Modified Organisms (GMOs)	4.1.1 4.1.2 4.1.3	All crop	All regions	Decree n° 2007/737 of 31 May 2007 fixing modalities of application of law n° 2003/006 of 21 April 2003	Minor	Significant	Most farmers regenerate their farms with species not known and the origin not massered	this is important to know if the species used for regeneration not to plant species that will not be productive	most farmers just collect species from local reserves and regenerate farms	interview with groups if they have reserves or distributed reserves to group members and also interview of farmers during filed audit to ask where reserves were obtained to regenerate farms
Agrochemicals Management	4.6.1 4.6.2 4.6.3	All crop	All regions	Law No 2003/003 of 21 April 2003	Significant	Possible	some farmers decide to go buy and spray their farms by themselves	They may buy products that are on the watch list and that are not homologated either by RA or by the Cameroonian government	Most farmers can not read nor write	Check if they used chemicals if yes which type and where did they buy it or who supplied to them
	5.1.1 5.1.2 5.1		rural areas							
Assess-and-Address Child Labor, Forced Labor, Discrimination, Workplace Violence and Harassment			rural areas	Law No. 67-LF-1 of 12 June 1967 on the Penal Code and all punishments for violations against children	Significant	Likely	poverty is the root cause	children of less than 18 can be found working in adverse conditions		Ask the number of children, their ages, interview with the children and observation in the different workers in plantations
Wages and Contracts	5.3.3	All crop	ALL regions	Décret n. 20230038PM du 21 mars 2023 fixant le Salaire Minimum Interprofessionnel Garant (SMIG)	Significant	Likely		lack of communication		Ask for the list of workers, their contracts and the payslips for the last three months then finalise with individual interview
Wages and Contracts	5.3.5	All crop	ALL regions	Décret n. 20230038PM du 21 mars 2023 fixant le Salaire Minimum Interprofessionnel Garant (SMIG)	Significant	Likely		lack of communication		Ask for the list of workers, their contracts and the payslips for the last three months then finalise with individual interview
Working Conditions	5.5		All regions	Labour Code/Law No. 92/007 of 14 August 1992	Significant	Possible	no legal contract between employer and employee	it has so may other point link to it		check workers contracts, pay slips, crps registrations, check working hours in the register of workers time arrive and departure
Health and Safety	5.6			039/MTPS/MT of 26 th November 1984 is the main legislation fixing the general rules of hygiene and safety at the workplace	Significant	Very Likely	most worker are labourers and are not well educated	there may be accident in the work place	most worker do not make analysis of accident risk link to their job	Check the diffent training analysis of accident risk, check signal of health and safety measure interview with workers
Forests, other Natural Ecosystems and Protected Areas	6.1		All regions	Communities and Wildlife Management in Cameroon The law N°094 20 Janv 1994 portant regime de la forêt et faune LETRE CIRCULAIRE N°324/LC/MINFOR/S G/DF DU 23 SEPTEMBRE 2009 RELATIVE AUX PROCEDURES DE DELIVRANCE DE SUIVI DES AUTORISATIONS DE RECUPERATION DE BOIS ET D'ENLEVEMENT DE BOIS LETRE CIRCULAIRE N°324/LC/MINFOR/S G/DF DU 23 SEPTEMBRE 2009 RELATIVE AUX PROCEDURES DE	Minor	Possible	growing population and the scarcity of agricultural land	there may be risk of deforestation in order to have agricultural land		Projection of waypoint of farms near protected areas
Conservation and Enhancement of Natural Ecosystems and Vegetation	6.2		All regions	Communities and Wildlife Management in Cameroon The law N°094 20 Janv 1994 portant regime de la forêt et faune LETRE CIRCULAIRE N°324/LC/MINFOR/S G/DF DU 23 SEPTEMBRE 2009 RELATIVE AUX PROCEDURES DE DELIVRANCE DE SUIVI DES AUTORISATIONS DE RECUPERATION DE BOIS ET D'ENLEVEMENT DE BOIS LETRE CIRCULAIRE N°0086/LC/MINFOR/CAB DU 18 MAI 2016 RELATIVE AUX OBLIGATIONS EN MATIERE DE	Minor	Possible	growing population and the scarcity of agricultural land	there may be risk of deforestation in order to have agricultural land		Projection of waypoint of farms near protected areas
No hunting or killing of wildlife	6.4.1	cocoa, coffee	Cocoa, coffee growing area	The law N°094 20 Janv 1994 portant regime de la forêt et faune	Significant	Likely	- Traditional hunting as a means of subsistence. - North west and South West crisis - Popular consumption of bushmeat	Progressive disappearance of protected and threatened wild species, degradation of natural habitats of wild animals The region of forest in the conflict area is not under control.	Difficulty relating the facts and trace of a limb hunt	- Inventory and hunting ban policy, interviews, observation. - Investigate the communities that have hunting practices - Observe hunting tracks, animal traps, guns, the company of hunting dogs and interview members before any conclusion - Also check that toxic substances are not used for hunting and fishing.
Processing wastewater	6.6.1	Cocoa, Banana, mangoes, pineapple, coconut	Cameroon	The law N°094 20 Janv 1994 portant regime de la forêt et faune	Moderate	Possible	- The Lack of an industrial wastewater treatment system - Lack of expertise in industrial wastewater treatment	- Contamination of surface and underground water by the infiltration of untreated wastewater before spillage, which can lead to public health problems.		- Verification of the water management plan (waste and drinking water) - Results of analyses of industrial wastewater and surrounding waterways and soils - Observation industrial wastewater discharge areas - Check the characteristics of the soil where the wastewater is poured, the slope "
Net Greenhouse Gases (GHG) emissions	6.9.1	All crops	Cameroon		Significant	Possible	ignorance of the consequences of using different energy sources	Climate change	How to calculate GHG emissions	RA provided guidance document P
Polygons are available for all farm units of 4ha and above. Geolocation points are available for all other farm units.	EUDR1	Cocoa, coffee,	Cameroon		Significant	Possible	Duplicates of waypoints, waypoints and polygon not corresponding	can give wrong interpretations	Technique for the collections and registration of geocalisation data	Check GMR, do the projection of the waypoints and polygons then compare groups data with your own filed data collected during audit



RAINFORREST ALLIANCE
RISK ASSESSMENT
2020 RA STANDARD

		For RA use only	
Certification body:	BUREAU VERITAS CÔTE D'IVOIRE	Date reviewed:	
Country:	KENYA	Reviewed by:	
Date submitted:	16/04/2024	Approved by:	
Contact person:	AKA MARIE BERTHE	Date approved:	

(Risk = risks to non-compliance)

Compliance topic	Related standard requirement	Risks related to specific--			Severity	Likelihood	What are the root causes	Why is this risk so important?	Interpretation challenges	Auditing technique to detect & reduce risks	Column1
		Crop(s)	Region(s)	Laws							
Grievance mechanisms for workers	4.9			Employment Act, No. 11 of 2007 Law	Minor	Possible	improper induction or inadequate representation by the shopstewards	Grievances raised by employees can be about much deeper issues with the system.	Failure of employees to raise the issues to third parties in lieu of repercussions	creating a audit environment where trust can be built.	
Wastewater treatment and analysis				Waste Management Regulations 2006	Significant	Possible	high cost of analyses, distance to labs	National and state laws often conflict and confuse regarding sampling and analysis requirements. State laws require sampling by certain labs that are not all equipped to carry out required analyses. Labs understaffed and cannot sample too distant from sampling sites.	Cannot comply with law or standard requirements without extremely high cost. Labs cannot analyze to RA minimum wastewater parameters.	What are the minimum parameters that should be analyzed? What is the minimum acceptable sampling and analysis frequency?	
Polygons are available for all farm units of 4ha and above. Geolocation points are available for all other farm units.	EUDR1	Cocoa, coffee,	production region	Agriculture Act, 2019	Significant	Very Likely	The CH's don't know how to use technology, how to use application for checking	Makes it difficult to confirm that there is no certified culture in protected area. And to get the actual farm size.	-The sometimes high number of producer files put in place; - Unavailability of GPS; - The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups - The declaration of areas during audits and almost always different from the areas in the registers. "	- Previous analysis of GPS coordinates and different images sources. - Equip auditors for the verification of a determinate number of GPS coordinates and farms size -RA provided Guidance Document F	
Geolocation data for both points and polygons must have 6 decimals.	EUDR2	Cocoa, coffee,	production region	Agriculture Act, 2019	Significant	Very Likely	The CH's don't know how to use technology, how to use application for checking	Makes it difficult to confirm that there is no certified culture in protected area. And to get the actual farm size.	-The sometimes high number of producer files put in place; - Unavailability of GPS; - The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups - The declaration of areas during audits and almost always different from the areas in the registers. "	- Previous analysis of GPS coordinates and different images sources. - Equip auditors for the verification of a determinate number of GPS coordinates and farms size -RA provided Guidance Document F	
Management implements measures to prevent and address potential cases of corruption (including bribery and extortion), fraud and nepotism by: - A written public statement that is communicated to group members/workers and supply chain partners- Training of management and workers/group members to raise awareness of possible forms, at least annually - Taking measures to avoid, and to remediate cases	EUDR3	Cocoa, coffee,	production region	Bribery Act (Act No. 47 of 2016) Anti-Corruption and Economic Crimes Act (Act No. 3 of 2003) (ACECA)	Significant	Likely	lack of money	we cannot trust everything he has put in place as an activity.	document authentication difficulties	-stakeholder interview -verification of contracts between the CH and the service providers	
Management shows evidence of payment of all applicable fees, royalties, taxes and other charges as prescribed by local laws and regulations.	EUDR4	Cocoa, coffee,	production region	Cooperative Societies Act, 2021.	Significant	Possible	lack of money	We run the risk of certifying a CH which does not comply with the laws of the country	knowledge of the taxes applicable to different types of CH	verification of proof of payment	

RAINFORREST ALLIANCE
RISK ASSESSMENT
2020 RA STANDARD

Certification body: Country: Date submitted: Contact person:	BUREAU VERITAS CÔTE D'IVOIRE	Date reviewed:
	MALI	Reviewed by:
	16/04/2024	Approved by:
	AKA MARIE BERTHE	Date approved:

(Risk = risks to non-compliance)

Compliance topic	Related standard requirement	Risks related to specific--			Severity	Likelihood	What are the root causes (quelles sont les raisons majeures)	Why is this risk so important? (Pourquoi ce risque est important)	Interpretation challenges (Défis d'interprétation)	Assessing technique to detect & reduce risks (Technique d'audit pour détecter et réduire les risques)
		Crop(s)	Region(s)	Laws						
Management capacity (Capacité de gestion)	1.1.1	Coton, mangue, pomme de terre	All growing area		Significant	Likely	<ul style="list-style-type: none"> - Each member is not aware of the importance of his task - The leaders of the group are not always interested in sustainability program - The low level of the group responsible for the statement that does not matter to the mark certification program - The applicable laws are not identified and known - Financial resources not allocated or insufficient - Shares of the group not based on any management plan or not updated management plan. 	<ul style="list-style-type: none"> - Negative impact on standard Implementation - Incomplete actions 	<ul style="list-style-type: none"> - Criteria to define the competence are unclear - All documents are in place but the system don't run 	<ul style="list-style-type: none"> - RA provided a Management Capacity Assessment Tool - Check the list of personnel responsible for the implementation of the Management System - Check the financial resources for the implementation of the management plan (organization team and the functions of the staff, the ADG, people in charge of the transformation and storage processes) - Check the regular assessments made to measure compliance with this standard. - Check the applicable laws defined, documented and understood by the group
Services providers (Prestataires de services)	1.2.2	Coton, mangue, pomme de terre	All regions		Moderate	Possible	<ul style="list-style-type: none"> - Service providers are recruited without a selection and evaluation mechanism 	<ul style="list-style-type: none"> - The service provider can provide services without meeting the requirements of the standard which will ultimately be the responsibility of the certified group 	<ul style="list-style-type: none"> - The specifications of the service providers are not clear 	<ul style="list-style-type: none"> - Interview with the group administrator on the recruitment method of service providers and their evaluation - Check the procedure on the selection mechanism. - Check the report and the evaluation result - Observe the operating service provider if necessary
Group member registry (Registre des membres du groupe)	1.2.4	Coton, mangue	Cocoa and coffee growing area	Acte uniforme OHADA du 15 décembre 2010 - Droit des sociétés coopératives	Significant	Very Likely	<ul style="list-style-type: none"> - Internal inspections were not carried out completely; - Internal inspection reports are not filled in correctly; - Group administrator is not competent, - Insufficient work equipment (GPS, rolling stock) - The register may contain fictitious members - The registry can contain members who are registered with several certified groups 	<ul style="list-style-type: none"> - (Traceability problem) Possible mixture of cocoa; impossible to control production potential; possibility of situation of the plantation in a protected area (HVC destruction) 	<ul style="list-style-type: none"> - The sometimes high number of producer files put in place; - Unavailability of GPS; Law respecting unclarified register - The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups - The declaration of areas during audits and almost always different from the areas in the registers. * 	<ul style="list-style-type: none"> - RA provided Guidance Document C - Checks of internal inspection sheets, verifications of the membership register, cocoa delivery; interview with some producers; internal inspectors, the storekeeper or purchasing manager, - Delimitation of plots
Correct Geolocation data and farms polygons (corriger les données de géolocalisation et les polygones des fermes)	1.1.11 & 1.2.12 & 1.2.13	Coton, mangue	Cocoa and coffee growing area		Severe	Very Likely	<ul style="list-style-type: none"> - The CH's don't know how to use technology, how to use application for checking 	<ul style="list-style-type: none"> - Makes it difficult to confirm that there is no certified culture in protected area. And to get the actual farm size. 	<ul style="list-style-type: none"> - The sometimes high number of producer files put in place; - Unavailability of GPS; - The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups - The declaration of areas during audits and almost always different from the areas in the registers. * 	<ul style="list-style-type: none"> - Previous analysis of GPS coordinates and different images sources - Equip auditors for the verification of a determinate number of GPS coordinates and farms site - RA provided Guidance Document F
Risk assessment (Evaluation des risques)	1.3.1 & 1.3.2	Coton, mangue, pomme de terre	All growing area	Décret N°2018-0991/P-RM du 31 Décembre 2018 relatif à l'Etude et de la Notice d'impacts environnemental et social	Significant	Likely	<ul style="list-style-type: none"> - The unqualified risk assessor; - The evaluation is non-participatory; - All the steps of the risk assessment were not followed - the high cost of an ESIA - Falsification of the risk assessment report 	<ul style="list-style-type: none"> - Possibility of non-compliance with the requirements of the standard - Possibility of destruction of natural ecosystems and HCVs; - Failure to respect the rights of neighboring populations; - Conflicts with local populations 	<ul style="list-style-type: none"> - Knowledge of the realities of the certified group's business area - Knowledge of and access to all national legislation; - Difference between the criteria of the standard and the requirements of the legislation; measures to mitigate negative impacts. 	<ul style="list-style-type: none"> - RA provided Annex 3 and Guidance Document B - Know the realities of the certified group's business area - Verification of the competence of the evaluators; - Interviews with the participants of the evaluation; - Examination of minutes and attendance lists.
Quality of internal inspection (La qualité du contrôle interne)	1.4.2	Coton, mangue	Cocoa and coffee growing area		Significant	Very Likely	<ul style="list-style-type: none"> - Lack of money to equip and pay internal inspectors - Internal inspectors have other occupations than the group activities - difficulties to find qualified persons in villages 	<ul style="list-style-type: none"> - Insufficient monitoring of farmers - Incomplete understanding of the requirement by the member 	<ul style="list-style-type: none"> - The groups do not have the same farmers spatial distribution - what are minimum qualifications and competencies for internal inspectors? 	<ul style="list-style-type: none"> - RA fixed a ratio between internal inspections and farms - Check if internal inspectors can read and write - Check if they went to school - Inspectors really conduct activities and give information concerning the standard
A grievance mechanism (non-communication and non-appropriation of complaint mechanisms) Mechanism de réclamation (non communication et non appropriation du mécanisme de plainte)	1.5.1	Coton, mangue, pomme de terre	All growing area	Loi du Travail au Mali N°2017-021 du 12 Juin 2017	Moderate	Possible	<ul style="list-style-type: none"> - Familiarity between group and worker and between group and community - fear of reprisals from other members of The community or group - Lack of real complaints and grievance mechanism - Lack of communication of The mechanism - Ignorance of The importance of The mechanism by workers or communities. - Ignorance of rights 	<ul style="list-style-type: none"> - Abuse - favoritism - ineffective treatment of concerns and / or disputes within the group 	<ul style="list-style-type: none"> - How to manage a problem that needed to be treated by the complaint protocole according the auditor but not been? - How to decide that a problem was well treated? 	<ul style="list-style-type: none"> - Interview techniques to detect problems that merit complaint handling - RA developed annex 4
Gender equality (égalité de genre)	1.6.1	Coton, mangue, pomme de terre	All growing area		Severe	Very Likely	<ul style="list-style-type: none"> - Women are just considered in food crops. - Some persons don't know that gender concern men also - unequal salary treatment 	<ul style="list-style-type: none"> - Women are less trained - less monitored - no improvement in women income. - Sometimes men are forgot in activities to promote gender equality 	<ul style="list-style-type: none"> - The standard do not specify clear action to promote gender equality - What can be considered as sufficient for gender equality promotion? 	<ul style="list-style-type: none"> - RA provided guidance document G - Check by interviews and documented proofs what was done for men and women according to their needs

Mixing of certified and non certified product (Melange de produit certifié et non certifié)	2.1	Coton, mangue	growing area	- Décret N° 00-505/P-RM du 16 octobre 2000 réglementation du commerce extérieur	Significant	Likely	- Insufficiency of the traceability system set up to manage the flow of certified product - Insufficient training of actors for the registration of the flow of certified product. - Fraud - The hunt for the premium of certain wormy actors - The lack of rigor or the tolerance of the auditors in the control of the traceability of the certified product. - Overestimation of yields - Non-existence of members - Inaccurate value of areas - Double registration of plots - Parallel sale - Risk of sale of non-certified product - Non-cooperation of state bodies	- Integrity of certify product - To prevent the product sold from being superior to the product harvested and to avoid all kinds of risks of mixing. - Attention of the media and denunciation of the media on fraudulent acts in the traceability process	- Lack of credibility of acreage data and estimation of farm yields - the non-conservation of traceability documents by producers and their ease of forgetting sales information - Inability to use information from the traceability system in certification and the national system (SYDORE).	- RA provided guidance document H - Interview with producers and actors of the traceability system - Visits to farms - Analysis of the traceability system put in place (traceability manual and documents relating to traceability, Register) - Average yields - Mapping - Previous deliveries, - Prescription history and forecast
Equipment used to define the weight (Appareil utilisé pour déterminer le poids)	2.1.9	Coton, mangue	growing area	DECRET N°2017-0200/P-RM DU 06 MARS 2017 FIXANT L'ORGANISATION ET LES MODALITES DE FONCTIONNEMENT DE L'AGENCE MALENIENNE DE METROLOGIE (AMAM)	Moderate	Possible	A national law designated only one structure for calibration of equipment used to define the weight. This structure don't take annually calibration as strict requirement	Large differences in weight between producers, cooperatives and exporters can result from this lack of calibration. The producer will always be the loser	Compliance with RA standard of national law?	- Check weigh difference if it is significant - Check if the group tests its scales itself at regular intervals - Give a non compliance if the farmer is the loser
Living income (Revenu vital)	3.1.2	Coton, mangue, pomme de terre	All growing area		Severe	Likely	- Living income is not define in the country - Living income is not well known by actors	without reference, groups will not know how to approach this requirement		- RA developed the annex 5 - Knowledge of living income for each country
Sustainability Differential (Différentiel de durabilité)	3.2.1	All crops	All growing area		Moderate	Possible	- Fraud	- Producers work hard to be certified but do not receive their Sustainability Differential - No improvement in the living conditions of farmers	- Most producers do not know the certified quantities sold - It is difficult to reconcile the amounts received because the Sustainability Differential is sometimes paid quarterly - Sometimes during audits Sustainability Differential are not yet been paid	Possibility to fix a rate to confirm interview from producer in term of percentage that lead to non conformity
Selection of plant varieties for planting, grafting and renovation (Selection des variétés de plantes, greffage et rénovation)	4.1.1	Coton	growing area	Communication du conseil coton	Severe	Very Likely	These actions are prohibited by the national management office to avoid overproduction	Most of Farms are less productive and cocoa trees are old	How to evaluate control points concerning farm management (pruning, renovation, weeding etc.)	
Privileged Use of inorganic fertilizers (Privilégier l'utilisation d'engrais inorganiques)	4.4.4	Coton, mangue, pomme de terre	All growing area		Severe	Very Likely	- More availability compared to organic fertilizer - Easy use compared to organic fertilizer	- soils have no good structure - Inorganic fertilizers are washed out in water bodies		
Prohibited agrochemicals (Interdire les produits agrochimiques)	4.6.1	Coton, mangue, pomme de terre	All growing area		Moderate	Possible	- Prohibited pesticides are cheaper and accessible on the markets - The low price of pesticides sold in the villages by itinerant and illegal traders; - Producers are not trained on good agricultural practices; or are not aware of the danger associated with the use of its products. - Fraud - The real products used in secret by the producers do not appear on the list of products used by the group, - The insufficient number of applicators.	- The producers themselves have to spray their plantations without the knowledge of the group's leaders; - Environmental contamination and human health problem. - Possibility of contamination of the bean (LMR). - The interviewed farmer is neither able to give the real names of the pesticides used, nor to explain the procedure for using these products.	- The interviewed farmer is neither able to give the real names of the pesticides used, nor to explain the procedure for using these products. - The real products used in secret by the producers do not appear on the list of products used by the group.	- RA provided Annex 7 - Analysis of the application register of applicators from the previous year - Interview with laborers, family members, neighbors
Functional personal protective equipment (PPE) (Equipeement de protection individuelle fonctionnel)	4.6.3	Coton, mangue, pomme de terre	All growing area		Severe	Likely	- Applicators use safety masks which are not functional due to overuse - Producers apply The plantations without The knowledge of The personnel responsible for The operations and do not use PPE - Damaged PPE is not replaced	Agrochemicals are dangerous for the health of the population and the environment	Producers apply themselves without the knowledge of the SGI without adequate PPE	- Check the application dates for agrochemicals, the state and the place of conservation - Interview applicators on the use of PPE - Interview the applicators on the knowledge of the measures to be taken in the event of application of the products on the list of restrictive substances - Check the preventive measures of the population in case of application of the products
Bathing facilities to all handlers of pesticides or other toxic substances (Installations sanitaires à tous les manipulateurs de pesticides et d'autres substances toxiques)	4.6.4	Coton, mangue	All growing area		Severe	Likely	The PPE is washed and kept at the home of the applicator	Possible contamination at home by agrochemicals	The washing areas on the farm are not available during audits outside of application periods, because destroyed or stolen after application.	- Ask The applicator about The PPE washing place after application - Check where The PPE is stored - Interview family members to find out who washes and where PPE is washed - Check The nature and state of cleanliness of The PPE
Arrangements of empty pesticides and Prohibited, obsolete and expired pesticides (Arrangement de pesticides vides et interdits, de pesticides obsolètes et expirés)	4.6.9	Coton, mangue	All growing area		Moderate	Possible	Non-functional elimination system of empty pesticides and Prohibited, obsolete and expired pesticides	Non authorized persons (children) handle these bottles		
Maximum residue levels (MRLs)	4.7.2	Coton, mangue, pomme de terre	growing area		Moderate	Possible	Tools for MLR measurements are not available for groups.	Lot of Farmers use pesticides and do not have checking tool of MRL and crops are for eating		
No worst forms of child labor (Pas de mauvaise formes du travail des enfants)	5.1	Coton, mangue	Coton, mangue growing area	- Convention sur l'âge minimum, 1973 (No 138), la Convention sur les pires formes de travail des enfants, 1999 (No 182), - Loi N°2017-021 du 12 juin 2017 portant modification du code de travail en République du Mali (Loi N°92-020 du 23 Septembre 1992) - loi no 2012- 023 du 12 juillet 2012 relative à la lutte contre la traite des personnes et les pratiques assimilées - Décret 2250 portant sur la liste des travaux dangereux - Arrêté n° 2017-4388 MTFP-SG du 29 décembre 2017 complétant la liste des travaux dangereux interdits aux enfants de moins de 18 ans	Significant	Likely	- Lack of workers. Need to reduce production costs - Easy labor - Absence / Distance from school - Parents' refusal to send the child to school because of field work - Poverty	- Failure to respect children's fundamental rights (education, health, safety, etc.) - Results of research on child labor in the cocoa sector: according to Tulane University (2013-2014), 2.26 million children work in cocoa production in Ghana and Côte d'Ivoire, i.e. an increase of 14% compared to 2008/2009 - In Côte d'Ivoire the percentage of children working in cocoa production increased from 23.1% to 34.9% - The percentage of children doing hazardous work in cocoa farming increased from 22.3% to 30.9%	- The scourge on child labor does exist, however, audit reports rarely take it into account. - Farms are rid of children during audits - It is difficult to detect the case of child labor because of the complicity of parents who hide and cover them up	- Check if there is a procedure to fight against child labor - check if a committee exists, intervene the committee - interviewed workers - Check whether the risk assessment takes into account the issue of child labor - Check workers' identity documents - Interview the minor workers met during the visits - Check the presence / proximity of schools
minimum wage or the wage negotiated in a Collective Bargaining Agreement (Salaire minimum ou salaire négocié dans une négociation d'accord collective)	5.3.3	Coton, mangue, pomme de terre	growing area	- Loi N°2017-021 du 12 juin 2017 portant modification du code de travail en République du Mali (Loi N°92-020 du 23 Septembre 1992) - BAREME DES SALAIRES 2017 (SECTEUR AGRICOLE, ELEVAGE ET FORET)	Significant	Likely	Minimum wage in agriculture sector is not well known. The employment rate is high. Agriculture is not enough profitable for smallholders	Many workers are receiving less than the national minimum wage, which is low in agriculture sector.	workers refuse to answer these types of questions at the risk of losing their jobs	- Interviews and verification of payslips - Check The employment contract
Workers' working hours (les heures de travail des travailleurs)	5.5.1	Coton, mangue, pomme de terre	growing area	- Loi N°2015-532 du 14 Septembre 2015 portant CODE DU TRAVAIL	Minor	Possible	Working hours are not registered	Many workers work more than authorized working hours in pic season	workers refuse to answer these types of questions at the risk of losing their jobs	- Interviews - Check The employment contract
Overtime work (Heure supplémentaire de travail)	5.5.2	Coton, mangue, pomme de terre	growing area	- Loi N°2017-021 du 12 juin 2017 portant modification du code de travail en République du Mali - Conventions internationales de travail	Minor	Likely	Working hours are not registered	For many workers, overtime work are not paid	It is difficult to verify the veracity when at overtime, there is no register which traces the working hours of the employees, the payslips of the employees are not archived on the site of the company.	Check the pay slips or slips of all employees, interview with the managers of the company (HRD, accounting), the different categories of employees.

Workers' to sufficient and safe drinking water (Les travailleurs à une eau potable en quantité suffisante et salubre)	5.6.6	Coton, mangue	Coton, mangue growing area	Loi N°2017-021 du 12 juin 2017 portant modification du code de travail en République du Mali	Significant	Likely	<ul style="list-style-type: none"> - Safe drinking water from the national network is not available in most localities - Insufficient drinking water sources in rural areas, use of surface water sources (rivers, lowlands, etc.) - Possible water contamination at all stages of supply - Lack of protection of drinking water supply sources 	<ul style="list-style-type: none"> - Water analysis are very expensive and the group directory can not take sample in all farm - Presence of diseases related to unsafe water 	<ul style="list-style-type: none"> - what are the characteristics of safe drinking water or how to make safe drinking water in area where there is no national water network or hydraulic pump - Presence of diseases related to unsafe water - The analysis reports relate only to the physico-chemical quality of the water. - The dispersion of farms / members. 	<ul style="list-style-type: none"> - RA must give clear instruction for safe drinking water: - water color - cleanliness of water body - how to consider wells? - water analysis need to be considered in all situation? - Check the preventive measures in case of contamination - Interview with workers and the community to find out if the drinking water provided is sufficient - Check if there are water related diseases
rights of indigenous peoples and local communities (Droits des indigènes et de la communauté locale)	5.8.1	Coton, mangue, pomme de terre	growing area	Loi N°2017-021 du 12 juin 2017 portant modification du code de travail en République du Mali	Significant	Likely	<ul style="list-style-type: none"> - Right to use the land are verbal in most case - The pressure of large companies on the occupation of land by populations 	<ul style="list-style-type: none"> - Protect the legitimate rights of land use over the lands of individuals or companies, the lands of producers under group administration, leased lands or lands in community or indigenous territories. 	<ul style="list-style-type: none"> - It is difficult to have advance information about conflicts over land tenure in the region. - Property and nationality are linked; the land issue remains one of the main drivers of the Ivorian conflict. The right to use agricultural land also remains subject to interpretation, in particular with regard to the articles of the law relating to "ownerless" land most often governed by customary arrangements. 	<ul style="list-style-type: none"> - Ra provided Annex 11 - Interview members on their legitimate right to land ownership; the time of detention, from which the land was acquired - Investigate with the neighboring community concerning conflicts, land limits - Check the cartographic boundaries - Interview of members and the community on the mode of land acquisition
Legal and legitimate right to use the land (Droit légal et légitimes pour utiliser la terre)	5.8.2	Coton, mangue, pomme de terre	growing area	<ul style="list-style-type: none"> - Ordonnance N°00-027/P-RM du 22 Mars 2000 portant code domanial et foncier, Droit coutumier 	Significant	Likely	<ul style="list-style-type: none"> - Right to use the land are verbal in most case - The villagers are often dispossessed of their land, for the benefit of rubber companies. - Only 4% of land is registered in rural areas despite significant investment - The fall in cocoa prices is causing great tension on the ground. Indeed the income from rental contracts, such as the "Planter-Partger" which is based on the income from the harvest has fallen. 	<ul style="list-style-type: none"> - The villagers are now without resources. They can no longer cultivate food; - development of defects; - destruction of their sacred forest; 	<ul style="list-style-type: none"> - Lack of documents to certify the villagers' right to their land. What does the Ivorian land code say about this? - Cultural incompatibility between the terms of the law (known as 98) which governs rural land and custom. The law advocates individual private property whereas, traditionally, property is more family-owned. Whoever wants a land title must divide the family land. This phase is not easy to achieve everywhere. 	<ul style="list-style-type: none"> - Check the land titles of the population - Interview the customary authorities, some inhabitants of all the surrounding villages, also question the officials of the rubber society - Check the Free, Prior and Informed Consent (FPIC) Processes
Destruction of natural forests and other natural ecosystems (Destruction des forêts naturelles et autres écosystèmes naturels)	6.1.1	Coton, mangue, pomme de terre	All growing area	<ul style="list-style-type: none"> - LOI NO 86-42/AN-RM PORTANT CODE FORESTIER - Décret n° 03 – 594 / P-RM du 31 décembre 2003 relatif à l'étude d'impact sur l'environnement - Arrêté N°09-1010/MEA/SG du 30 avril 2009 portant création de l'unité de gestion du programme de gestion décentralisée des forêts (GEDEFOR). - Loi n°10-028 du 12 juillet 2010 déterminant les principes de gestion des ressources du domaine Forestier National 	Significant	Likely	<ul style="list-style-type: none"> - Naturel forests and natural ecosystems are not well know and recognize - Traditional practice of establishing new cocoa plantations on soils deemed fertile and colonized by fallows and forests. - Low capacity to fertilize farm soils. 	<ul style="list-style-type: none"> - Makes it difficult to claim "deforestation free." - Large areas of forest are disappearing little by little 	<ul style="list-style-type: none"> - There is many definition of natural forest and natural ecosystem 	<ul style="list-style-type: none"> - Need of a clear definition of natural forest and natural ecosystem - Inventory and management plan - Protection of natural ecosystems and protected areas in the area. - Use of GPS, Use of Global Forest Watch. - Interview, visit of farms, - Check information with state bodies
protected areas or buffer zones (Zones protégées ou zones tampon)	6.1.2	coton, mangue	Coton, mangue growing area	<ul style="list-style-type: none"> - Décret N°02-243/P-RM du 13 mai 2002 fixant l'organisation et les modalités de fonctionnement de la Direction Nationale de la Conservation de la Nature - Décret N°99-321/P-RM du 04 octobre 1999 fixant les modalités de classement, de déclassement des réserves de faunes, des sanctuaires et les modalités de création des zones d'intérêt cynégétique et des ranches de gibier dans le domaine forestier de l'état. - Décret N° 00-022/P-RM du 19 janvier 2000 fixant les modalités de classement et de déclassement des forêts, des périmètres de protection dans le domaine forestier de l'état, - LOI NO 86-42/AN-RM PORTANT CODE FORESTIER - Document du programme de Gestion Décentralisée des Forêts (GEDEFOR) d'octobre 2008 	Significant	Likely	<ul style="list-style-type: none"> - Smallholders clandestinely practice "creeping deforestation"; large landowners buy recently deforested land 	<ul style="list-style-type: none"> - Makes it difficult to claim "deforestation free." - Large areas of forest are disappearing little by little 	<ul style="list-style-type: none"> - It is difficult to get aerial photos or other imagery for these areas. Coverage is limited in Google Earth and Global Forest watch. 	<ul style="list-style-type: none"> - Previous analysis of different images sources. Need for a tool for percentage of the total area under natural vegetation cover measurement - Community interviews and public consultations. Walk boundaries of farms and look for evidence.
Monitoring of natural vegetation cover (suivi de la couverture végétale)	6.2.3	coton, mangue	Coton, mangue growing area	<ul style="list-style-type: none"> - Décret N°02-243/P-RM du 13 mai 2002 fixant l'organisation et les modalités de fonctionnement de la Direction Nationale de la Conservation de la Nature - Décret N°99-321/P-RM du 04 octobre 1999 fixant les modalités de classement, de déclassement des réserves de faunes, des sanctuaires et les modalités de création des zones d'intérêt cynégétique et des ranches de gibier dans le domaine forestier de l'état. - Décret N° 00-022/P-RM du 19 janvier 2000 fixant les modalités de classement et de déclassement des forêts, des périmètres de protection dans le domaine forestier de l'état, - LOI NO 86-42/AN-RM PORTANT CODE FORESTIER - Document du programme de Gestion Décentralisée des Forêts (GEDEFOR) d'octobre 2008 	Significant	Likely	<ul style="list-style-type: none"> - Farmers don't know when area under natural vegetation cover is sufficient or not 	<ul style="list-style-type: none"> - Continuous deforestation in farm until a critical threshold in most of farms 	<ul style="list-style-type: none"> - It is difficult to get aerial photos or other imagery for these areas. Coverage is limited in Google Earth and Global Forest watch. It is difficult to do loss calculation. How to measure percentage of the total area under natural vegetation cover? 	<ul style="list-style-type: none"> - Previous analysis of different images sources. Need for a tool for percentage of the total area under natural vegetation cover measurement
No hunting or killing of wildlife (Non à la chasse et tuerie de la faune)	6.4.1	coton, mangue	Coton, mangue growing area	<ul style="list-style-type: none"> - Décret n°97-052/P-RM du 31 janvier 1997 déterminant les conditions et modalités d'exercice des droits conférés par les titres de chasse. - Décret N°2018-0991/P-RM du 31 Décembre 2018 relatif à l'Etude et à la Notice d'impacts environnemental et social - Document du programme de Gestion Décentralisée des Forêts (GEDEFOR) d'octobre 2008 	Significant	Likely	<ul style="list-style-type: none"> - Traditional hunting as a means of subsistence. - Popular consumption of bushmeat 	<ul style="list-style-type: none"> - Progressive disappearance of protected and threatened wild species, degradation of natural habitats of wild animals 	<ul style="list-style-type: none"> - Difficulty relating the facts and trace of a limb hunt 	<ul style="list-style-type: none"> - Inventory and hunting ban policy, interviews, observation. - Investigate the communities that have hunting practices - Observe hunting tracks, animal traps, guns, the company of hunting dogs and interview members before any conclusion. - Also check that toxic substances are not used for hunting and fishing.
Processing wastewater (Traitement des eaux usées)	6.6.1	Coton, mangue, pomme de terre	All growing area	<ul style="list-style-type: none"> - Décret N°2018-0991/P-RM du 31 Décembre 2018 relatif à l'Etude et à la Notice d'impacts environnemental et social - LOI N°02-006/DU 31 JAN.2002 PORTANT CODE DE L'EAU 	Moderate	Possible	<ul style="list-style-type: none"> - The Lack of an industrial wastewater treatment system - Lack of expertise in industrial wastewater treatment 	<ul style="list-style-type: none"> - Contamination of surface and underground water by the infiltration of untreated wastewater before spillage, which can lead to public health problems 		<ul style="list-style-type: none"> - Verification of the water management plan (waste and drinking water) - Results of analyzes of industrial wastewater and surrounding waterways and soils - Observation industrial wastewater discharge areas - Check the characteristics of the soil where the wastewater is poured, the slope *



**RAINFORREST ALLIANCE
RISK ASSESSMENT
2020 RA STANDARD**

Certification body:	BUREAU VERITAS CÔTE D'IVOIRE	Date reviewed:	
Country:	CONGO, BRAZZAVILLE	Reviewed by:	
Date submitted:	16/04/2024	Approved by:	
Contact person:	AKA MARIE BERTHE	Date approved:	

Compliance topic	Related standard requirement	Risks related to specific				Severity	Likelihood	What are the root causes	Why is this risk so important?	Interpretation challenge	Auditing technique to detect & reduce risks	Column 1
		Crop(s)	Region(s)	Laws								
Services providers	1.2.2	Cocoa, coffee	All regions		Moderate	Possible						
Group member registry	1.2.4	Cocoa and coffee growing area		Acte uniforme OHADA du 15 décembre 2010 - Droit des sociétés coopératives	Significant	Very Likely	<ul style="list-style-type: none"> - Internal inspections were not carried out completely; - Internal inspection reports are not filed in correctly; 	<ul style="list-style-type: none"> - (Traceability problem) Possible mixture of cocoa: impossible to control production potential; - Unavailability of GPS; 	<ul style="list-style-type: none"> - The sometimes high number of producer files put in place; - Checks of internal inspection sheets; 	<ul style="list-style-type: none"> - RA provided Guidance Document C - Check if internal inspection sheets; 		
Gender equality	1.6.1	Cocoa, coffee	All growing area		Severe	Very Likely	<ul style="list-style-type: none"> - Women are the ones who work the most in cocoa plantations - Some persons don't know that gender concern men also 	<ul style="list-style-type: none"> - Women are less trained - no improvement in women income. 	<ul style="list-style-type: none"> - The standard do not specify clear action to promote gender equality - What can be 	<ul style="list-style-type: none"> - RA provided guidance document G - Check by interviews and documented proofs 		
Mixing of certify and non certify product	2.1	Cocoa, coffee	growing area		Significant	Likely	<ul style="list-style-type: none"> - Insufficiency of the traceability system set up to manage the flow of certified product - Insufficient training of actors for the 	<ul style="list-style-type: none"> - Integrity of certify product - To prevent the product sold from being superior to the product harvested and 	<ul style="list-style-type: none"> - Lack of credibility of acreage data and estimation of farm yields - the non-conservation of 	<ul style="list-style-type: none"> - RA provided guidance document H - interviews with producers and actors of 		
Functional personal protective equipment (PPE)	4.6.3	Cocoa, coffee, Banana, mangoes, pineapple	All growing area		Severe	Likely	<ul style="list-style-type: none"> - Applicators use safety masks which are not functional due to aversus - Producers apply the plantations without the Knowledge of the Personnel 	<ul style="list-style-type: none"> - Agrochemicals are dangerous for the health of the population and the environment 	<ul style="list-style-type: none"> - Producers apply themselves without the knowledge of the SCI without adequate PPE 	<ul style="list-style-type: none"> - Check the application dates for agrochemicals, the state and the place of conservation 		
Genetically Modified Organisms (GMOs)	4.1.1 4.1.2 4.1.3	All crop	All regions		Minor	Possible	<ul style="list-style-type: none"> - Most farmers regenerate their farms with species not known and the origin not mastered 	<ul style="list-style-type: none"> - This risk is possible because most producers have no real knowledge of the species used in their plantations. 	<ul style="list-style-type: none"> - Most farmers are content with species that they find just nearby or grown by some relatives for their farms 	<ul style="list-style-type: none"> - Conduct interviews with these farmers, their workers and families to ensure the origin of the cultivated species 		
Agrochemicals Management	4.6.1 4.6.2 4.6.3	All crop	All regions		Minor	Possible	<ul style="list-style-type: none"> - Farmers have very little interest in agrochemicals. In addition, they do not have too much knowledge of agrochemicals in Congo - Women applied agrochemical in the farms 	<ul style="list-style-type: none"> - There is very little communication on the use of agrochemicals in agriculture. So the few farmers are content with what they can find with the few vendors of agrochemicals. 	<ul style="list-style-type: none"> - Most farmers can not read nor write and they are also not trained. 	<ul style="list-style-type: none"> - Check if they used chemicals if yes which type and where did they buy it or who supplied to them and who apply the agrochemicals 		
ACCESS AND ADDRESS	5.1.1 5.1.3	All Crop	rural areas		Minor	Possible	<ul style="list-style-type: none"> - children perform hazardous work on farms - Opportunity to see cases of forced labor, discrimination and violence and workplace harassment 	<ul style="list-style-type: none"> - There is very little communication about hazardous work, forced labor, discrimination and violence and workplace harassment 	<ul style="list-style-type: none"> - Most farmers don't know all information about hazardous work, forced labor, discrimination and violence and workplace harassment 	<ul style="list-style-type: none"> - Check if the group have in place ACCESS AND ADDRESS system 		
Assess-and-Address Child Labor, Forced Labor, Discrimination, Workplace Violence and Harassment	5.1		rural areas		Minor	Possible	<ul style="list-style-type: none"> - The Congolese are very little interested in agriculture. 	<ul style="list-style-type: none"> - The school enrollment rate is very low in rural areas. 	<ul style="list-style-type: none"> - The majority of Congolese have only one meal / day 	<ul style="list-style-type: none"> - Ask the number of children , their ages, interview with the children and observation in the different workers in plantations 		
Working Conditions	5.5		All regions		Significant	Possible	<ul style="list-style-type: none"> - no legal contract between employer and employee 	<ul style="list-style-type: none"> - it has so may other point link to it 		<ul style="list-style-type: none"> - check workers contract, pay slips, cnps registrations, check working hours in the register of wastes time arrive and depature 		
Health and Safety	5.6				Significant	Very Likely	<ul style="list-style-type: none"> - most workers are laborers and not trained at all 	<ul style="list-style-type: none"> - there can be an accident in the workplace at any time 	<ul style="list-style-type: none"> - most workers are virtually unaware of the link between accident risk and their work 	<ul style="list-style-type: none"> - Check the different training offer to workers, check signal od health and safety measure interview with workers 		
Forests, other Natural Ecosystems and Protected Areas	6.1		All regions		Minor	Possible	<ul style="list-style-type: none"> - The regulations on protected areas are very strict and known by most farmers. In addition there is enough unexploited cultivable land 	<ul style="list-style-type: none"> - there may be risk of deforestation in order to have agricultural land 		<ul style="list-style-type: none"> - Projection of waypoint of farms near protected areas 		
Conservation and Enhancement of Natural Ecosystems and Vegeta	6.2				Minor	Possible	<ul style="list-style-type: none"> - The regulations on protected areas are very strict and known by most farmers. In addition there is enough unexploited cultivable land 	<ul style="list-style-type: none"> - there may be risk of deforestation in order to have agricultural land 		<ul style="list-style-type: none"> - Projection of waypoint of farms near protected areas 		
No hunting or killing of wildlife	6.4.1	All crop	All regions		Important	Possible	<ul style="list-style-type: none"> - Traditional hunting as a means of subsistence - Popular consumption of bushmeat 	<ul style="list-style-type: none"> - Progressive disappearance of protected and threatened wild species and degradation of natural habitats of wild animals 	<ul style="list-style-type: none"> - Difficulty relating the facts and trace of a farm hunt 	<ul style="list-style-type: none"> - Inventory and hunting ban policy, interviews, observation, - Investigate the communities that have hunting practices - Observe hunting 		
Processing wastewater	6.6.1	Cocoa, banana, mangoes, pineapple, cassava	All regions		Minor	Possible	<ul style="list-style-type: none"> - The Lack of an industrial wastewater treatment system - Lack of expertise in industrial wastewater treatment 	<ul style="list-style-type: none"> - Contamination of surface and underground water by the infiltration of untreated wastewater before spillage, which can lead to public health problems 		<ul style="list-style-type: none"> - Verification of the water management plan (waste and drinking water) - Results of analyzes of industrial wastewater and surrounding waterways and soils - Observation industrial wastewater discharge areas - Check the characteristics of the soil where the wastewater is poured, the slope " 		
Net Greenhouse Gases (GHG) emissions	6.9.1	All crops	CONGO		Significant	Possible	<ul style="list-style-type: none"> - Ignorance of the consequences of using different energy sources 	<ul style="list-style-type: none"> - Climate change 	<ul style="list-style-type: none"> - How to calculate GHG emissions 	<ul style="list-style-type: none"> - RA provided guidance document P 		
Polygons are available for all farm units of 4ha and above. Geolocation points are available for all other farm units.	EUD01	Cocoa, coffee,	growing area	LOI N° 11/022 DU 24 DECEMBRE 2011 PORTANT PRINCIPES FONDAMENTAUX RELATIFS A L'AGRICULTURE	Severe	Very Likely	<ul style="list-style-type: none"> - The CH's don't know how to use technology, how to use application for checking 	<ul style="list-style-type: none"> - Makes it difficult to confirm that there is no certified culture in protected area.And to get the actual farm size. 	<ul style="list-style-type: none"> - The sometimes high number of producer files put in place; - Unavailability of GPS; - The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups - "The declaration of areas during audits and almost always different from the areas in the registers." 	<ul style="list-style-type: none"> - Previous analysis of GPS coordinates and different images sources; - Equip auditors for the verification of a determinate number of GPS coordinates and farms size - RA provided Guidance Document F 		
Geolocation data for both points and polygons must have 6 decimals.	EUD02	Cocoa, coffee,	growing area	LOI N° 11/022 DU 24 DECEMBRE 2011 PORTANT PRINCIPES FONDAMENTAUX RELATIFS A L'AGRICULTURE	Severe	Very Likely	<ul style="list-style-type: none"> - The CH's don't know how to use technology, how to use application for checking 	<ul style="list-style-type: none"> - Makes it difficult to confirm that there is no certified culture in protected area.And to get the actual farm size. 	<ul style="list-style-type: none"> - The sometimes high number of producer files put in place; - Unavailability of GPS; - The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups - "The declaration of areas during audits and almost always different from the areas in the registers." 	<ul style="list-style-type: none"> - Previous analysis of GPS coordinates and different images sources; - Equip auditors for the verification of a determinate number of GPS coordinates and farms size - RA provided Guidance Document F 		
Management implements measures to prevent and address potential cases of corruption (including bribery and extortion), fraud and nepotism by : A written public statement that is communicated to group members/workers and supply chain partners; Training of management and workers/group members to raise awareness of possible forms, at least annually - Taking measures to avoid, and to remediate cases	EUD03	Cocoa, coffee,	growing area	loi n°9-2022 du 11 mars 2022 LOI N° 5 - 2009 DU 22 SEPTEMBRE 2009 sur la corruption, la concussion et la fraude et les infractions assimilées en République du Congo	lack of money	we cannot trust everything he has put in place as an activity.	<ul style="list-style-type: none"> - document authentication difficulties 	<ul style="list-style-type: none"> - stakeholder interview - verification of contracts between the CH and the service providers 				
Management shows evidence of payment of all applicable fees, royalties, taxes and other charges as prescribed by local laws and regulations.	EUD04	Cocoa, coffee,	growing area	Loi n° 3-2007 du 24 janvier 2007 réglementant les importations, les exportations et les réexportations.	lack of money	We run the risk of certifying a CH which does not comply with the law of the country	<ul style="list-style-type: none"> - knowledge of the taxes applicable to different types of CH 	<ul style="list-style-type: none"> - verification of proof of payment 				



Certification body:	BUREAU VERITAS CÔTE D'IVOIRE
Country:	France
Date submitted:	16/04/2024
Contact person:	AXA MARIE BERTHE

(Risk = risks to non-compliance)

Instructions

The Certification Body (CB) should list applicable local laws for all core requirement of the RA 2020 Standard according to the geographic scope requested (the format should include individual legislations for each country). The following is a brief explanation of how to complete the template:

Compliance topic	Related standard requirement	Risks related to specific...					Describe the risk	What are the root causes	Why is this risk so important?	Interpretation challenges	Auditing technique to detect & reduce risks
		Crop(s)	Region(s)	Laws	Severity	Likelihood					
	1.1.3						no specific risk identified				
	1.1.4						no specific risk identified				
	1.2.3						no specific risk identified				
	1.2.5						no specific risk identified				
	1.2.9						no specific risk identified				
	1.2.16						no specific risk identified				
	1.2.17						no specific risk identified				
	1.4.1						no specific risk identified				
	1.4.2						no specific risk identified				
	1.4.3						no specific risk identified				
	1.5.1						no specific risk identified				
	1.6.1						no specific risk identified				
	1.6.2						no specific risk identified				
	2.1.3						no specific risk identified				
	2.1.4						no specific risk identified				
	2.1.6						no specific risk identified				
	2.1.7						no specific risk identified				
	2.1.9						no specific risk identified				
	2.1.10						no specific risk identified				
	2.1.11						no specific risk identified				
	2.1.12						no specific risk identified				
	2.1.13						no specific risk identified				
	2.2.1						no specific risk identified				
	2.2.2						no specific risk identified				
	2.2.3						no specific risk identified				
	2.2.4						no specific risk identified				
	2.2.5						no specific risk identified				
	2.2.6						no specific risk identified				
	2.2.7						no specific risk identified				
	2.3.1						no specific risk identified				
	2.3.2						no specific risk identified				
	2.3.3						no specific risk identified				
	2.3.4						no specific risk identified				
	2.3.5						no specific risk identified				
	3.2.3						no specific risk identified				
	3.2.4						no specific risk identified				
	3.2.5						no specific risk identified				
	3.2.6						no specific risk identified				
Minimum Sustainability Differential	3.2.7	All crops apart from cocoa			Moderate	Possible	The sustainability differential paid could be insufficient	For the moment RA did not established a Minimum Sustainability Differential for all crops (only for cocoa)	as soon as RA establish a sustainability differential minimum for other crops the buyers of certified product might not respect		a transition periods should be fixed by RA to enable the contracts updating, with the new MSD.
	3.3.4						no specific risk identified				
	3.3.5						no specific risk identified				
	3.4.1						no specific risk identified				
	3.4.2						no specific risk identified				
	3.4.3						no specific risk identified				
	3.4.4						no specific risk identified				
Comity members of Assess and Adress	5.1.1	all crops			Moderate	Possible	Assess and Adress comity could be less efficient than expected because Comity Members could be partial.	the comity representative are named, they could be themself involved in conflict relative to discrimination and harassment.	Efficiency of the Assess and Adress comitee is low. Workers might be mistruful.	this is tricky to attest the impartiality of someone, especially with the topic discrimination and harassment, comity members could have affinity with the people involved in this conflicts.	the appointment as comity member should be based on selection criteria established by the direction and workers representatives. Comity members should undertake to honour to respect impartiality.
	5.1.2						no specific risk identified				
	5.1.3						no specific risk identified				
	5.1.4						no specific risk identified				
	5.2.1						no specific risk identified				
	5.2.2						no specific risk identified				
	5.2.3						no specific risk identified				
	5.3.1						no specific risk identified				
	5.3.2						no specific risk identified				
	5.3.3						no specific risk identified				
	5.3.5						no specific risk identified				
	5.3.6						no specific risk identified				
Remuneration of work	5.3.8	all crops		article 8.1. la loi Informatique et libertes du 6 janvier 1978	Minor	Possible	The salary assessment depending on skin colour, origin etc. Will not be available.	ethnic statistics are not allowed in France.	Some required data for this criteria might be missing	Should the management collect data about workers salary regarding their opinions, origin.?	for same jobs Salary should be compared. If significant differences are observed an acceptable reason should be provided.
	5.3.9						no specific risk identified				
	5.5.1						no specific risk identified				
	5.5.2						no specific risk identified				
Breastfeeding and workplace	5.5.3	all crops			Moderate	Likely	A specific place at work dedicated for breastfeeding or for expressing breast milk might be missing or not fulfil the entire requirement of RA standarts.	UK did not ratified the ILO convention N°183 dealing with protection of motherhood	This is discrimination against women workers, who have to choose between return to work or breastfeeding		
	5.6.1						no specific risk identified				
	5.6.2						no specific risk identified				
	5.6.4						no specific risk identified				
	5.6.7						no specific risk identified				
	5.6.8						no specific risk identified				
	5.6.9						no specific risk identified				
	5.6.10						no specific risk identified				
	5.6.11						no specific risk identified				
	5.6.12						no specific risk identified				
	5.6.13						no specific risk identified				
	5.6.14						no specific risk identified				
	5.6.15						no specific risk identified				
	5.6.16						no specific risk identified				
	6.1						no specific risk identified				
	6.2						no specific risk identified				
	6.3						no specific risk identified				

**RAINFOREST ALLIANCE
RISK ASSESSMENT
2020 RA STANDARD**

Certification body:	BUREAU VERITAS COTE D'IVOIRE
Country:	UNITED KINGDOM
Date submitted:	16/04/2024
Contact person:	AKA MARIE BERTHE

(Risk = risks to non-compliance)

Instructions

The Certification Body (CB) should list applicable local laws for all core requirement of the RA 2020 Standard according to the geographic scope requested (the format should include individual legislations for each country). The following is a brief explanation of how to complete the template:

Compliance topic	Related standard requirement	Risks related to specific...				Likelihood	Describe the risk	What are the root causes	Why is this risk so important?	Interpretation challenges	Auditing technique to detect & reduce risks
		Crop(s)	Region(s)	Laws	Severity						
Documentation regarding RA management and procedures	1.1.3	All	All	NA	Moderate	Likely	Management do not have resources enough and plan does not address all RA requirements and documented procedures are incomplete	Lack of professional competence of responsible staff and top management involvement	Non-compliance could compromise control of handling the certified products	One of the aspects can be lost right at, especially when management time using is channelled more in one direction and some relevant issues are not noticed.	A good knowledge of the content of the organization and of the certified products from the planning stage of the audit. Preparing in advance a list of certified products and some procedures to check
Responsible business conduct	1.1.4	All	All	EU legislation	High	Possible	Policies are either incomplete or not communicated or not properly implemented	Insufficient involvement of senior management, insufficient accountability of partners	The policies cover both human rights and environmental protection and non-compliance in this area represents breaches of legislation and/or standard requirements.	Given the complexity of the subject matter, the correct and large enough sampling of audit evidence plays a very important role. Also, the existence of a balanced relationship between what happens in practice vs. the related documentation can be overlooked.	Effective interviewing using the open question technique with senior management, fair sampling, objective assessment of the relationship between practices and documentation of it.
Certification rules for 3rd parties	1.2.3	All	All	NA	Moderate	Likely	Failure of business partners to comply to certification rules	Inability to properly assess business partners due to deficiencies either of attitude or professional capacity.	A non-compliance of partners leads to a non-compliance of certified products in the organization	Focus on the completeness of the list of partners and not on their evaluation	Assessment of documents attesting that a proper evaluation of partners has been carried out
Ensuring accurate worker evidence	1.2.5	All	All	Law 52 of 2003 Updated on 4 October 2021 by GED 117 of 2021 (Labour Code)	High	Possible	The inability of organizations to collect complete and accurate data on their workers	Lack of a systematic procedure for collecting data from all workers, regardless of the nature of the contract, inability of those responsible to update the data collected	The risk is severe as this is legally regulated and a breach of this clause could lead to a breach of the law.	Auditors might be tempted to see if there is a list of workers and if the data collected is complete, without verifying these data by objective evidence (identity cards etc.) if they are also current.	Training of auditors to verify including the data collected for day workers and to have an auditing technique that allows the verification of data based on objective evidence
Keeping documents and records for at least 4 years	1.2.9	All	All	EU legislation	High	Unlikely	Loss of all documents and records	Failure to provide a back-up system for documents and records	The risk is severe as this is legally regulated and a breach of this clause could lead to a breach of the law. However, the likelihood of occurrence was determined to be statistically very low.	Auditors could focus on documents and records that are current and very close to the present time.	Train auditors to verify the archiving of documents attesting that the standard and legal provisions. Auditors should have knowledge of ERP and ICT payment systems.
Ensuring competent human resources	1.2.16	All	All	NA	Moderate	Possible	Inadequate allocation of resources, decrease quality of the system but just signed some training protocols	Either the assessment of the workers or the recording of their competences was done improperly. The employees were not actually trained but just signed some training protocols.	If competency mapping has not been done properly, resources could be misallocated, leading to poor quality.	The inability to match the competences required for a particular position with the current qualifications of the occupant. Failure to collect objective evidence including, for example, interviewing staff.	Staff should be interviewed using the open-ended questioning technique in order to see if they are really competent for the job and have even taken part in training. Auditor should ask if company is measuring the training results.
Efficient management of sites under the umbrella of the administrator (valid for multi-sites)	1.2.17	All	All	NA	Low	Likely	Loss of control over sites	Poor management on the part of the administrator	Leads to loss of important information and loss of overview	Not knowing which sites should be included in each administrator's list	Auditors should prepare themselves in the audit planning process by listing the sites that should be included in the list of administrators.
An efficient internal inspection, self-assessment and sanction system is in place	1.4 (1.4.1 - 1.4.3)	All	All	NA	High	Possible	Failure to obtain initial certification or recertification due to insufficient preparation	Failure to understand the importance of internal certification or recertification by not adequately human resources, lack of a risk-based approach. Failure to implement adequate corrective measures that also fulfil a preventive function	Can lead to loss of certification or recertification by not effectively and timely detecting gaps and weaknesses in the system	Verification of internally audited processes only quantitatively, not qualitatively. Loss of focus on risk-based aspects. Leaving out of sight how corrective actions are implemented and whether continuous improvement is considered.	Auditors have to audit such processes using an internal audit, management self-assessment. The risk-based approach should not be lost sight of.
A grievance mechanism is in place	1.5.1	All	All	Law No 363/2007 on combating unfair practices by traders in dealings with consumers and harmonising regulations with European consumer protection legislation	Moderate	Likely	The management system cannot be improved	Insufficiently trained human resources, lack of adequate communication system for reporting	Failure to implement a complaint management system leads to poor quality without the possibility of continuous improvement because problems are not noticed and addressed.	Focus only on the presence or absence of complaints and how they were handled, not on the system as a whole.	Understanding the functioning of the grievance system as a whole and checking the validation of the system by the organisation. The auditor may request as objective evidence for validation of the system.
Gender equality	1.6 (1.6.1 - 1.6.2)	All	All	C11 - Convention (n° 111) concernant la discrimination (emploi et profession), 1958 approuvée 08 juin 1999	High	Possible	The working climate does not comply with legal provisions on gender equality at work, leading to potential lawsuits, problems with authorities, fines, etc.	Lack of involvement and accountability of top management in this issue. Lack of awareness of the issue with deep social and educational roots.	Gender inequality and lack of awareness of the issue at a systemic level can lead to costly lawsuits, fines, loss of reputation in the labour market and more.	In general, it is difficult to detect if there are gender inequality issues within an organisation. Reasons include the fact that often even women are not aware that they are discriminated against.	The level of awareness of the entire staff, regardless of hierarchical function, and the way in which control measures are implemented throughout the system must be tested. Interviews with staff using the open question technique are recommended as audit techniques.
Implementing an effective traceability system	Chapter 2	All	All	NA	High	Possible	Loss of control over assets	Lack of knowledge or equipment failure	Poor traceability leads to a loss of control over goods with economic implications, blocking of all goods (not only those with problems), loss of reputation and credibility on the market, counterfeiting (giving away goods falsely as belonging to a certain category), etc.	Difficulties in interpretation arise from the lack of efficient implementation of the traceability system taking into account the particularities imposed by the RA	A good knowledge of the particularities of the requirements to be met by the specific RA traceability system. Conducting a proper traceability test taking into account both human and material resources.
Payment of Sustainability Differential & of Sustainability Investment	3.2 (3.2.3 - 3.2.7) & 3.3 (3.3.4 - 3.3.6)	All	All	NA	Moderate	Possible	Failure to assume liability and to invest in sustainability by a timely payment	The desire to make profit without taking responsibility. Willingness to benefits from some RA certified products without paying as agreed for their benefits	Lack of payment leads to a decline in sustainability. Contractual clauses are breached with legal repercussions for offenders.	Lack of knowledge of contract terms, date when payment was to be made, arrangements for clear record of payment.	Training on a good knowledge of the particular situation regarding payment and records of payments.
NO CHILD LABOR, FORCED LABOR, DISCRIMINATION, WORKPLACE VIOLENCE AND HARASSMENT	5.1 (5.1 - 5.1.4)	All	All	C183 - Worst Forms of Child Labour Convention, 1999 (No. 182) approuvée 22/03/2000 Fundamental Provisions, CFA	High	Possible	Top management fails to effectively manage of CHILD LABOR, FORCED LABOR, DISCRIMINATION, WORKPLACE VIOLENCE AND HARASSMENT	Lack of top management involvement and monitoring of compliance with legislation.	Non-compliance implies violation of legislation with criminal liability of the responsible persons.	Unreported and unrecorded cases from the past are difficult to verify. Uncovering such cases involves management involvement	Open-ended questioning technique, investigating situations that may not have been reported. Interviewing employees at all hierarchical levels.
Ensuring freedom of association	5.2 (5.2.1 - 5.2.3)	All	All	C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) approuvée 03/04/2008	High	Possible	Employees are denied a right they should have and/or they are subject to discrimination or retaliation for reasons of past or present workers' association	Top management's unwillingness and/or ignorance to facilitate and encourage this workers' right.	Non-compliance implies violation of legislation.	The documents may often present a picture that does not correspond to the real situation.	Open-ended questioning technique, interviewing employees at all hierarchical levels.
Ensuring fair wages and proper employment contracts	5.3 (5.3.1 - 5.3.9)	All	All	Contracts between employers associations and trade unions	High	Possible	Workers are being unfairly treated through remuneration or contractual provisions that are inconsistent with the most advantageous in the market	Employer's unwillingness or ignorance	Non-compliance implies violation of legislation with criminal liability of the responsible persons.	Discrepancy between records and actual situation	Open-ended questioning technique, interviewing employees at all hierarchical levels.
Ensuring proper working conditions	5.5 (5.5.1 - 5.5.3)	All	All	EU legislation. Contracts between employers associations and trade unions	High	Possible	Failure to respect workers' rights regarding working hours, overtime and maternity protection	Employer's unwillingness or ignorance	Non-compliance implies violation of legislation with criminal liability of the responsible persons.	Discrepancy between records and actual situation. In the case of maternity rights, the current lack of women benefiting from this protection does not imply the absence of conditions and penalization for	Open-ended questioning technique, interviewing employees at all hierarchical levels. Inspection of existing facilities for breastfeeding women and investigation of the conditions provided in
Adequate environment to ensure health and safety at work	5.6 (5.6.1 - 5.6.14)	All	All	UK ratified the ILO Convention 102 - C130 - 161 ; 158 ; 162 ; 160 ; 161 ; 162 ; 163 ; 164 ; 165 ; 166 ; 167 ;	High	Unlikely	Health impairment of workers (pregnant women or women who have just given birth, endangering pregnancy or newborn child)	Failure to provide a safe working environment either due to human error or defects in the equipment used.	Accidents at work or endangering workers in any way during working hours are particularly serious incidents, which, in addition to the ethical impact, have legal repercussions for the employer.	Without a proper risk analysis it is often difficult to assess situations that pose a danger.	Sound knowledge of risk assessment in the field of occupational safety and health. Open-ended questioning technique in interviews with workers at all hierarchical levels.

Efficient wastewater management	6.6 (6.6.1 - 6.6.2)	All	All	EU legislation The Urban Waste Water Treatment (England and Wales) Regulations 1994	Moderate	Possible	Contamination of surface and underground water by the infiltration of untreated wastewater before spillage	Lack of expertise in industrial wastewater treatment, lack of knowledge and/or human error	Can lead to public health problems, environmental pollution, violation of legal provisions with legal consequences	Inconsistency between the documentation and the situation on the field	Verification of the water management plan (waste and drinking water) Results of analyzes of industrial wastewater and surrounding waterways and soils Observation industrial wastewater discharge areas
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**RAINFOREST ALLIANCE
RISK ASSESSMENT
2020 RA STANDARD**

Certification body:	BUREAU VERITAS COTE D'IVOIRE
Country:	FINLAND
Date submitted:	16/04/2024
Contact person:	AKA MARIE BERTHE

(Risk = risks to non-compliance)

Instructions

The Certification Body (CB) should list applicable local laws for all core requirement of the RA 2020 Standard according to the geographic scope requested (the format should include individual legislations for each country). The following is a brief explanation of how to complete the template:

Compliance topic	Related standard requirement	Risks related to specific...			Severity	Likelihood	Describe the risk	What are the root causes	Why is this risk so important?	Interpretation challenges	Auditing technique to detect & reduce risks
		Crop(s)	Region(s)	Laws							
Documentation regarding RA management and procedures	1.1.3	All	All	NA	Moderate	Likely	Management do not have resources enough and procedures does not address all RA requirements and documented procedures are incomplete	Lack of professional competence of responsible staff and top management involvement	Non-compliance could compromise control of handling the certified products	One of the aspects can be lost sight of, especially when management time using is focused to more than one direction and some relevant issues are not noticed.	A good knowledge of the content of the organization and of the certified products from the planning stage of the audit. Preparing in advance a list of certified products and some procedures to check
Responsible business conduct	1.1.4	All	All	EU Legislation	High	Possible	Policies are either incomplete or not properly implemented	Insufficient involvement of senior management, insufficient accountability of partners and middle management.	The policies cover both human rights and environmental protection and non-compliance in this area represents breaches of legislation and/or standard requirements.	Given the complexity of the subject matter, the correct and large enough sampling of audit evidence plays a very important role. Also, the existence of a balanced relationship between what happens in practice vs. the related documentation can be overlooked.	Effective interviewing using the open question technique with senior management, fair sampling, objective assessment of the relationship between practices and documentation of it.
Certification rules for 3rd parties	1.2.3	All	All	NA	Moderate	Likely	Failure of business partners to comply to certification rules	Inability to properly assess business partners due to deficiencies either of attitude or professional capacity.	A non-compliance of partners leads to a non-compliance of certified products in the organization	Focus on the completeness of the list of partners and not on their evaluation	Assessment of documents to check that a proper evaluation of partners has been carried out
Ensuring accurate worker evidence	1.2.5	All	All	Law 53 of 2000 Updated on 4 October 2021 by GEO 117 of 2021 (Labour Code)	High	Unlikely	The inability of organizations to collect complete and accurate data on their workers	Lack of a systematic procedure for collecting data from all workers, regardless of the nature of the contract, inability of those responsible to update the data collected	The risk is severe as this is legally regulated and a breach of this clause could lead to a breach of the law.	Auditors might be tempted to see if there is a list of workers and if the data collected is complete, without verifying these data by objective evidence (identity cards etc.) if they are also current. In Finland the social security	Training of auditors to verify including the data collected for day workers and to have an auditing technique that allows the verification of data based on objective evidence
Keeping documents and records for at least 4 years	1.2.9	All	All	EU legislation	High	Unlikely	Loss of all documents and records	Failure to provide a back-up system for documents and records	The risk is severe as this is legally regulated and a breach of this clause could lead to a breach of the law. However, the likelihood of occurrence was determined to be statistically very low.	Auditors could focus on documents and records that are current and very close to the present time.	Train auditors to verify the archiving of documents according to the standard and legal provisions. Auditors should have knowledge of ERP and ICT payment systems.
Ensuring competent human resources	1.2.16	All	All	NA	Moderate	Possible	Inadequate allocation of resources, decreased quality of the system	Either the assessment of the workers or the recording of their competences was done improperly. The employees were not actually trained but just signed some training protocols.	If competency mapping has not been done properly, resources could be misallocated, leading to poor quality.	The inability to match the competencies required for a particular position with the current qualifications of the occupant. Failure to collect objective evidence including, for example, interviewing staff.	Staff should be interviewed using the open-ended questioning technique in order to see if they are really competent for the job and have even taken part in training. Auditor should also, if company is measuring the training results.
Efficient management of sites under the umbrella of the administrator (valid for multi-sites)	1.2.17	All	All	NA	Low	Likely	Loss of control over sites	Poor management on the part of the administrator	Leads to loss of important information and loss of overview	Not knowing which sites should be included in each administrator's list	Auditors should prepare themselves in the audit planning process by listing the sites that should be included in the list of administrators.
An efficient internal inspection, self-assessment and sanction system is in place	1.4 (1.4.1 - 1.4.3)	All	All	NA	High	Possible	Failure to obtain initial certification or recertification due to insufficient preparation	Failure to understand the importance of internal evaluation and treat it superficially, failure to allocate adequate human resources, lack of a risk-based approach. Failure to implement adequate corrective measures that also fulfil a preventive function	Can lead to loss of certification or recertification by not effectively and timely detecting gaps and weaknesses in the system are implemented and whether continuous improvement is considered.	Verification of internally audited processes only quantitatively, not qualitatively. Loss of focus on risk-based aspects. Leaving out of sight how corrective actions are implemented and whether continuous improvement is considered.	Auditors have to audit such processes as internal audit, management self-assessment. The risk-based approach should be kept in mind.
A grievance mechanism is in place	1.5.1	All	All	Law No 363/2007 on combating unfair practices by traders in dealings with consumers and harmonising regulations with European consumer protection legislation	Moderate	Likely	The management system cannot be improved	Insufficiently trained human resources, lack of adequate communication system for reporting	Failure to implement a complaint management system leads to poor quality without the possibility of continuous improvement because problems are not noticed and addressed.	Focus only on the presence or absence of complaints and how they were handled, not on the system as a whole.	Understanding the functioning of the grievance system as a whole and checking the validation of the system by the organization. The auditor may request as objective evidence for validation of the system.
Gender equality	1.6 (1.6.1 - 1.6.2)	All	All	Finland Labour Law - (Finland ratified the ILO convention in 23 Apr 1970 in Force.	High	Possible	The working climate does not comply with legal provisions on gender equality at work, leading to potential lawsuits, problems with authorities, fines, etc.	Lack of involvement and accountability of top management in this issue. Lack of awareness of the issue with deep social and educational roots.	Gender inequality and lack of awareness of the issue at a systemic level can lead to costly lawsuits, fines, loss of reputation in the labour market and more.	In general, it is difficult to detect if there are gender inequality issues within an organization. Reasons include the fact that often even women are not aware that they are discriminated against.	The level of awareness of the entire staff, regardless of hierarchical function, and the way in which control measures are implemented throughout the system must be tested. Interviews with staff using the open question technique are recommended as audit techniques.
Implementing an effective traceability system	Chapter 2	All	All	NA	High	Possible	Loss of control over assets	Lack of knowledge or equipment failure	Poor traceability leads to a loss of control over goods with economic implications, blocking of all goods (not only those with problems), loss of reputation and credibility on the market.	Difficulties in interpretation arise from the lack of efficient implementation of the traceability system taking into account the particularities imposed by the RA	A good knowledge of the particularities of the specific RA traceability system. Conducting a proper traceability test taking into account both human and material resources.
Payment of Sustainability Differential & of Sustainability Investment	3.2 (3.2.3 - 3.2.7) & 3.3 (3.3.4 - 3.3.6)	All	All	NA	Moderate	Possible	Failure to assume liability and to invest in sustainability by a timely payment	The desire to make profit without taking responsibility. Willingness to benefit from some RA certified products without paying as agreed for these benefits.	Lack of payment leads to a decline in sustainability. Contractual clauses are breached with legal repercussions for offenders.	Lack of knowledge of contract terms, date when payment was to be made, arrangements for clear record of payment.	Training on a good knowledge of the particular situation regarding payment and records of payments.
NO CHILD LABOR, FORCED LABOR, DISCRIMINATION, WORKPLACE VIOLENCE AND HARASSMENT	5.1 (5.1 - 5.1.4)	All	All	Finland ratified the ILO convention 17 Jan 2000 In Force EU fundamental rights Chart - Finland Labour Law - ratified the ILO convention in 13 Jan 1936 In Force and 27 May 1960 In Force	High	Unlikely	Top management fails to effective management of CHILD LABOR, FORCED LABOR, DISCRIMINATION, WORKPLACE VIOLENCE AND HARASSMENT	Lack of top management involvement and monitoring of compliance with legislation.	Non-compliance implies violation of legislation with criminal liability of the responsible persons.	Unreported and unrecorded cases from the past are difficult to verify. Uncovering such cases involves management involvement.	Open-ended questioning technique, investigating situations that may not have been reported. Interviewing employees at all hierarchical levels.
Ensuring freedom of association	5.2 (5.2.1 - 5.2.3)	All	All	Finland Labour Law - ratified the ILO convention in 20 Jan 1950 In Force, Finland Labour Law - ratified the ILO convention 13 Jan 1976 In Force	High	Unlikely	Employees are denied a right they should have and/or they are subject to discrimination or retaliation for reasons of past or present workers' organization or union membership or activities.	Top management's unwillingness and/or ignorance to facilitate and encourage this workers' right.	Non-compliance implies violation of legislation.	The documents may often present a picture that does not correspond to the real situation.	Open-ended questioning technique, interviewing employees at all hierarchical levels.

Ensuring fair wages and proper employment contracts	5.3 (5.3.1 - 5.3.9)	All	All	Contracts between employers associations and trade unions	High	Possible	Workers are being unfairly treated through remuneration or contractual provisions that are inconsistent with the work performed and in violation of legal provisions.	Employer's unwillingness or ignorance	Non-compliance implies violation of legislation with criminal liability of the responsible persons.	Discrepancy between records and actual situation	Open-ended questioning technique, interviewing employees at all hierarchical levels.
Ensuring proper working conditions	5.5 (5.5.1 - 5.5.3)	All	All	EU legislation. Contracts between employers associations and trade unions	High	Possible	Failure to respect workers' rights regarding working hours, overtime and maternity protection	Employer's unwillingness or ignorance	Non-compliance implies violation of legislation with criminal liability of the responsible persons.	Discrepancy between records and actual situation. In the case of maternity rights, the current lack of women benefiting from this protection does not imply the absence of conditions and regulation for such cases.	Open-ended questioning technique, interviewing employees at all hierarchical levels. Inspection of existing facilities for breastfeeding women and investigation of the conditions provided in case of such cases (when they do not currently exist).
Adequate environment to ensure health and safety at work	5.6 (5.6.1 - 5.6.14)	All	All	PT15 - Protocol of 2002 to the Occupational Safety and Health Convention, 1981 (ratified on 09 Dec 2003 (in Force)) Has ratified the Protocol of 2002 24 Apr 1985 in force.	High	Unlikely	Health impairment of workers/pregnant women or women who have just given birth, endangering pregnancy or newborn child	Failure to provide a safe working environment either due to human error or defects in the equipment used.	Accidents at work or endangering workers in any way during working hours are particularly serious incidents, which, in addition to the ethical impact, have legal repercussions for the employer.	Without a proper risk analysis it is often difficult to assess situations that pose a danger.	Sound knowledge of risk management in the field of occupational safety and health. Open-ended questioning technique in interviews with workers at all hierarchical levels.
Efficient wastewater management	6.6 (6.6.1 - 6.6.2)	All	All	EU legislation and national law. https://www.finlex.fi/fi/jarki/ajantasa/2017/20170157	Moderate	Possible	Contamination of surface and underground water by the infiltration of untreated wastewater before spillage.	Lack of expertise in industrial wastewater treatment, lack of knowledge and/or human error	Can lead to public health problems, environmental pollution, violation of legal provisions with legal consequences	Inconsistency between the documentation and the situation on the field	Verification of the water management plan (waste and drinking water). Results of analyses of industrial wastewater and surrounding waterways and soils. Observation industrial wastewater discharge areas.



RAINFOREST ALLIANCE
RISK ASSESSMENT
 2020 RA STANDARD

Certification body:	BUREAU VERITAS CÔTE D'IVOIRE	Date	
	Country:	Czech republic	Reviewed
		16/04/2024	Approved
	Date submitted:	AKA MARIE BERTHE	Date
Contact person:		approved	

(Risk = risks to non-compliance)

Compliance topic	Related standard requirement	Risks related to specific...					Severity	Likelihood	What are the root causes	Why is this risk so important?	Interpretation challenges	Auditing technique to detect & reduce risks
		Crop(s)	Region(s)	Laws								
Documentation regarding RA management and procedures	1.1.3.	All	All	NA		Moderate	Likely	Management does not have resources enough and plan does not address all RA requirements and documented procedures are incomplete	Lack of professional competence of responsible staff and top management involvement	Non-compliance could compromise control of handling the certified products	One of the aspects can be lost sight of, especially when management time using is channelled more in one direction and some relevant issues are not noticed.	
Responsible business conduct	1.1.4	All	All	EU legislation + CZ legislation		High	Possible	Policies are either incomplete or not communicated or not properly implemented	Insufficient involvement of senior management, insufficient accountability of partners	The policies cover both human rights and environmental protection and non-	Given the complexity of the subject matter, the correct and large enough sampling of	
Certification rules for 3rd parties	1.2.3	All	All	NA		Moderate	Likely	Failure of business partners to comply to certification rules	Inability to properly assess business partners due to deficiencies either of attitude or professional capacity.	A non-compliance of partners leads to a non-compliance of certified products in the organization	Focus on the completeness of the list of partners and not on their evaluation	
Ensuring accurate worker evidence	1.2.5	All	All	Law 262 (labor code of CZ) - fundamental point § 96		High	Possible	The inability of organisations to collect complete and accurate data on their workers	Lack of a systematic procedure for collecting data from all workers, regardless of the nature of the contract, inability of those responsible to update the data collected	The risk is severe as this is legally regulated and a breach of this clause could lead to a breach of the law.	Auditors might be tempted to see if there is a list of workers and if the data collected is complete, without verifying these data by objective evidence (identity cards etc.) if they are also current.	
Keeping documents and records for at least 4 years	1.2.9	All	All	EU legislation + CZ legislation		High	Unlikely	Loss of all documents and records	Failure to provide a back-up system for documents and records	The risk is severe as this is legally regulated and a breach of this clause could lead to a breach of the law. However, the likelihood of occurrence was determined to be statistically very low.	Auditors could focus to documents and records that are current and very close to the present time.	
Ensuring competent human resources	1.2.16	All	All	NA		Moderate	Possible	Inadequate allocation of resources, decreased quality of the system	Either the assessment of the workers or the recording of their competences was done improperly. The employees were not actually trained but just signed some training protocols.	If competency mapping has not been done properly, resources could be misallocated, leading to poor quality.	The inability to match the competencies required for a particular position with the current qualifications of the occupant. Failure to collect objective evidence including, for example, interviewing staff.	
Efficient management of sites under the umbrella of the administrator (valid for multi-sites)	1.2.17	All	All	NA		Low	Likely	Loss of control over sites	Poor management on the part of the administrator	Leads to loss of important information and loss of overview	Not knowing which sites should be included in each administrator's list	
An efficient internal inspection, self-assessment and sanction system is in place	1.4. (1.4.1 - 1.4.3)	All	All	NA		High	Possible	Failure to obtain initial certification or recertification due to insufficient preparation	Failure to understand the importance of internal evaluation and treat it superficially, failure to allocate adequate human resources, lack of a risk-based approach. Failure to implement adequate corrective measures that also fulfill a preventive function	Can lead to loss of certification or recertification by not effectively and timely detecting gaps and weaknesses in the system	Verification of internally audited processes only quantitatively, not qualitatively. Loss of focus on risk-based aspects. Leaving out of sight how corrective actions are implemented and whether continuous improvement is considered.	
A grievance mechanism is in place	01/05/2001	All	All	Law No 634/1992 part 19 on combating unfair practices by traders in dealings with consumers and harmonising regulations with European consumer protection legislation		Moderate	Likely	The management system cannot be improved	Insufficiently trained human resources, lack of adequate communication system for reporting	Failure to implement a complaint management system leads to poor quality without the possibility of continuous improvement because problems are not noticed and addressed.	Focus only on the presence or absence of complaints and how they were handled, not on the system as a whole.	
Gender equality	1.6. (1.6.1 - 1.6.2)	All	All	CZ Labour law + EU regulations		High	Possible	The working climate does not comply with legal provisions on gender equality at work, leading to potential lawsuits, problems with authorities, fines, etc.	Lack of involvement and accountability of top management in this issue. Lack of awareness of the issue with deep social and educational roots.	Gender inequality and lack of awareness of the issue at a systemic level can lead to costly lawsuits, fines, loss of reputation in the labour market and more.	In general, it is difficult to detect if there are gender inequality issues within an organisation. Reasons include the fact that often even women are not aware that they are discriminated against.	
Implementing an effective traceability system	Chapter 2	All	All	Reg 178/2004/ES part 18		High	Possible	Loss of control over assets	Lack of knowledge or equipment failure	Poor traceability leads to a loss of control over goods with economic implications, blocking of all goods (not only those with problems), loss of reputation and credibility on the market, counterfeiting (giving away goods falsely as belonging to a certain category), etc.	Difficulties in interpretation arise from the lack of efficient implementation of the traceability system taking into account the particularities imposed by the RA	
Payment of Sustainability Differential & of Sustainability Investment	3.2 (3.2.3 - 3.2.7) & 3.3 (3.3.4 - 3.3.6)	All	All	NA		Moderate	Possible	Failure to assume liability and to invest in sustainability by a timely payment	The desire to make profit without taking responsibility. Willingness to benefit from some RA certified products without paying as agreed for these benefits	Lack of payment leads to a decline in sustainability. Contractual clauses are breached with legal repercussions for offenders.	Lack of knowledge of contract terms, date when payment was to be made, arrangements for clear record of payment.	
NO CHILD LABOR, FORCED LABOR, DISCRIMINATION, WORKPLACE VIOLENCE AND HARASSMENT	5.1 (5.1 - 5.1.4)	All	All	Law No 420/1990 EU fundamental rights chart		High	Possible	Top management fails to effective manage of CHILD LABOR, FORCED LABOR, DISCRIMINATION.	Lack of top management involvement and monitoring of compliance with legislation.	Non-compliance implies violation of legislation with criminal liability of the responsible persons.	Unreported and unrecorded cases from the past are difficult to verify. Uncovering such cases	
Ensuring freedom of association	5.2 (5.2.1 - 5.2.3)	All	All	Law NO 2/1992 Cz laour code		High	Possible	Employees are denied a right they should have and/or they are subject to discrimination or retaliation for reasons of past or present workers' organization or union membership or activities.	Top management's unwillingness and/or ignorance to facilitate and encourage this workers' right.	Non-compliance implies violation of legislation.	The documents may often present a picture that does not correspond to the real situation.	
Ensuring fair wages and proper employment contracts	5.3 (5.3.1 - 5.3.9)	All	All	Contracts between employers associations and trade unions		High	Possible	Workers are being unfairly treated through remuneration or contractual provisions that are inconsistent with the work performed and in violation of legal provisions.	Employer's unwillingness or ignorance	Non-compliance implies violation of legislation with criminal liability of the responsible persons.	Discrepancy between records and actual situation	
Ensuring proper working conditions	5.5 (5.5.1 - 5.5.3)	All	All	EU legislation. Contracts between employers associations and trade unions		High	Possible	Failure to respect workers' rights regarding working hours, overtime and maternity protection	Employer's unwillingness or ignorance	Non-compliance implies violation of legislation with criminal liability of the responsible persons.	Discrepancy between records and actual situation. In the case of maternity rights, the current lack of women benefiting from this protection does not imply the absence of conditions and regulation for such cases.	

Adequate environment to ensure health and safety at work	5.6 (5.6.1 - 5.6.14)	All	All	Cz Labour code Law 309/2009 in the meantime, other requirements for safety and health protection at work in labor relations are regulated	High	Unlikely	Health impairment of workers/pregnant women or women who have just given birth: endangering pregnancy or newborn child	Failure to provide a safe working environment either due to human error or defects in the equipment used.	Accidents at work or endangering workers in any way during working hours are particularly serious incidents, which, in addition to the ethical impact, have legal repercussions for the employer.	Without a proper risk analysis it is often difficult to assess situations that pose a danger.
Efficient wastewater management	6.6 (6.6.1 - 6.6.2)	All	All	EU legislation + Cz legislation	Moderate	Possible	Contamination of surface and underground water by the infiltration of untreated wastewater before spillage	Lack of expertise in industrial wastewater treatment, lack of knowledge and/or human error	Can lead to public health problems, environmental pollution, violation of legal provisions with legal consequences	Inconsistency between the documentation and the situation on the field
Workers' to sufficient and safe drinking water	5.6.6	Cocoa, coffee	Cocoa, coffee growing area	Law No 252/2004 hygienic requirements for drinking and hot water	Significant	Likely	- Safe drinking water from the national network is not available in most localities - Insufficient drinking water sources in rural areas, use of surface water sources (rivers, lowlands, etc.). - Possible water contamination at all stages of supply - Lack of protection of drinking water supply sources	- Water analysis are very expensive and the group directory can not take sample in all farm - Presence of diseases related to unsafe water	- What are the characteristics of safe drinking water or how to make safe drinking water in area where there is no national water network or hydraulic pump - Presence of diseases related to unsafe water - The analysis reports relate only to the physico-chemical quality of the water. - The dispersion of farms / members.	RA must give clear instruction for safe drinking water: - water color - cleanness of water body - how to consider wells? - water analysis need to be consider in all situation? - Check the preventive measures in case of contamination - Interview with workers and the community to find out if the drinking water provided is sufficient - Check if there are water related diseases
rights of indigenous peoples and local communities	5.8.1	Cocoa, coffee, Banana, mangoes, pineapple	growing area	Low No 198/2009 Anti-discrimination law	Significant	Likely	- Right to use the land are verbal in most case - The pressure of large companies on the occupation of land by populations	- Protect the legitimate rights of land use over the lands of individuals or companies, the lands of producers under group administration, leased lands or lands in community or indigenous territories.	It is difficult to have advance information about conflicts over land tenure in the region. Property and nationality are linked, the land issue remains one of the main drivers of the Ivorian conflict. The right to use agricultural land also remains subject to interpretation, in particular with regard to the articles of the law relating to "ownerless" land most often governed by customary arrangements.	- Ra provided Annex 11 - Interview members on their legitimate right to land ownership; the time of detention, from which the land was acquired - Investigate with the neighboring community concerning conflicts, land limits - Check the cartographic boundaries - Interview of members and the community on the mode of land acquisition
Legal and legitimate right to use the land	5.8.2	Banana, mangoes, pineapple	growing area	N/A	Significant	Likely	- Right to use the land are verbal in most case - The villagers are often dispossessed of their land, for the benefit of rubber companies. - Only 4% of land is registered in rural areas despite significant investment - The fall in cocoa prices is causing great tension on the ground. Indeed the income from rental contracts, such as the "Planter-Partger" which is based on the income from the harvest has fallen.	- The villagers are now without resources, they can no longer cultivate food; - development of defects; - destruction of their sacred forest;	Lack of documents to certify the villagers' right to their land. What does the Ivorian land code say about this? - Cultural incompatibility between the terms of the law (known as 98) which governs rural land and custom. The law advocates individual private property whereas, traditionally, property is more family-owned. Whoever wants a land title must divide the family land. This phase is not easy to achieve everywhere.	- Check the land titles of the population - Interview the customary authorities, some inhabitants of all the surrounding villages, also question the officials of the rubber society - Check the Free, Prior and Informed Consent (FPIC) Processes
Destruction of natural forests and other natural ecosystems	6.1.1	Cocoa, coffee, Banana, mangoes, pineapple	All growing area	Law No 114/1992 Act on Nature and Landscape Protection law No 282/1991 environmental inspection Law No 167/2008 on preventing ecological damage	Significant	Likely	- Nature forests and natural ecosystems are not well know and recognize - Traditional practice of establishing new cocoa plantations on soils deemed fertile and colonized by fallows and forests. - Low capacity to fertilize farm soils.	Makes it difficult to claim "deforestation free." Large areas of forest are disappearing little by little	There is many definition of natural forest and natural ecosystem	- Need of a clear definition of natural forest and natural ecosystem - Inventory and management plan - Protection of natural ecosystems and protected areas in the area, - Use of GPS, Use of Global Forest Watch, - Interview, visit of farms, - Check information with state bodies
protected areas or buffer zones	6.1.2	cocoa, coffee	Cocoa, coffee growing area	- Décret N° 2002-359 du 24 Juillet 2002, portant création, organisation et fonctionnement de l'OIPR - Loi n° 2002-102 du 11 février 2002 relative à la création, à la gestion et au financement des parcs nationaux et des réserves naturelles - Décret N° 66-428-du-15-septembre-1966 fixant les procédures de classement et de déclassement des forêts domaniales - Loi N° 2014- 427 DU 14 JUILLET 2014 portant Code forestier - Document de stratégie du programme national sur le changement climatique	Significant	Likely	Smallholders clandestinely practice "creeping deforestation"; large landowners buy recently deforested land	Makes it difficult to claim "deforestation free." Large areas of forest are disappearing little by little	It is difficult to get aerial photos or other imagery for these areas. Coverage is limited in Google Earth and Global Forest watch.	Previous analysis of different images sources. Community interviews and public consultations. Walk boundaries of farms and look for evidence.
Monitoring of natural vegetation cover	6.2.3	cocoa, coffee	Cocoa, coffee growing area	- Décret N° 2002-359 du 24 Juillet 2002, portant création, organisation et fonctionnement de l'OIPR - Loi n° 2002-102 du 11 février 2002 relative à la création, à la gestion et au financement des parcs nationaux et des réserves naturelles - Décret N° 66-428-du-15-septembre-1966 fixant les procédures de classement et de déclassement des forêts domaniales - Loi N° 2014- 427 DU 14 JUILLET 2014 portant Code forestier - Document de stratégie du programme national sur le changement climatique	Significant	Likely	Farmers don't know when area under natural vegetation cover is sufficient or not	Continuous deforestation in farm until a critical threshold in most of farms	It is difficult to get aerial photos or other imagery for these areas. Coverage is limited in Google Earth and Global Forest watch. It is difficult to do loss calculation. How to measure percentage of the total area under natural vegetation cover?	Previous analysis of different images sources. Need for a tool for percentage of the total area under natural vegetation cover measurement
No hunting or killing of wildlife	6.4.1	cocoa, coffee	Cocoa, coffee growing area	- Loi N° 94-442 portant modification de la loi N° 65-255 relative à la protection de la faune et à l'exercice de la chasse. - Code de l'environnement (Article 17, 19, 44) - Loi N° 2016-554 du 26 Juillet 2016 relative à la pêche et à l'aquaculture - Document de stratégie du programme national sur le changement climatique	Significant	Likely	- Traditional hunting as a means of subsistence. - Popular consumption of bushmeat	Progressive disappearance of protected and threatened wild species, degradation of natural habitats of wild animals	Difficulty relating the facts and trace of a limb hunt	- Inventory and hunting ban policy, interviews, observation. - Investigate the communities that have hunting practices - Observe hunting tracks, animal traps, guns, the company of hunting dogs and interview members before any conclusion. - Also check that toxic substances are not used for hunting and fishing.
Processing wastewater	6.6.1	Cocoa, Banana, mangoes, pineapple, cocunut	All growing area	- Loi N° 96-766 du 3 octobre 1996 portant Code de l'Environnement; - Loi N° 98-755 du 23 décembre 1998 portant Code de l'eau	Moderate	Possible	- The Lack of an industrial wastewater treatment system - Lack of expertise in industrial wastewater treatment	- Contamination of surface and underground water by the infiltration of untreated wastewater before spillage, which can lead to public health problems		- Verification of the water management plan (waste and drinking water) - Results of analyses of industrial wastewater and surrounding waterways and soils - Observation industrial wastewater discharge areas - Check the characteristics of the soil where the wastewater is poured, the slope "

Net Greenhouse Gases (GHG) emissions 6.9.1

Cocoa, coffee, Banana, mangoes, pineapple
All growing area

Significant	Possible
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Ignorance of the consequences of using different energy sources
Climate change

How to calculate GHG emissions

RA provided guidance document P

**RAINFOREST ALLIANCE
RISK ASSESSMENT
2020 RA STANDARD**

Certification body:	BUREAU VERITAS COTE D'IVOIRE
Country:	ROMANIA
Date submitted:	16/04/2024
Contact person:	AKA MARIE BERTHE

(Risk = risks to non-compliance)

Instructions

The Certification Body (CB) should list applicable local laws for all core requirement of the RA 2020 Standard according to the geographic scope requested (the format should include individual legislations for each country). The following is a brief explanation of how to complete the template:

Compliance topic	Related standard requirement	Risks related to specific...				Describe the risk	What are the root causes	Why is this risk so important?	Interpretation challenges	Auditing technique to detect & reduce risks	
		Crop(s)	Region(s)	Laws	Severity						
Documentation regarding RA management and procedures	1.1.3	All	All	NA	Moderate	Likely	Management plan fails to address all RA requirements and documented procedures are incomplete	Lack of professional competence of responsible staff and top management involvement	Non-compliance could compromise control on certified products	There are actually two requirements in one. One of the aspects can be lost sight of, especially when energy is channelled more in one direction (e.g. one analyses the management plan in detail and the procedures superficially or vice versa).	A good knowledge of the context of the organisation and in particular of the certified products from the planning stage of the audit. Preparing in advance a list of certified products and some procedures to check
Responsible business conduct	1.1.4	All	All	EU Legislation	High	Possible	Policies are either incomplete or not properly implemented	Insufficient involvement of senior management, insufficient accountability of partners	The policies cover both human rights and environmental protection and non-compliance in this area represents breaches of legislation and/or standard requirements.	Given the complexity of the subject matter, the correct sampling of audit evidence plays a very important role. Also, the existence of a balanced relationship between what happens in practice vs.	Effective interviewing using the open question technique with senior management, fair sampling, objective assessment of the relationship between best practice and documentation of it.
Certification rules for 3rd parties	1.2.3	All	All	NA	Moderate	Likely	Failure of business partners to comply to certification rules	Inability to properly assess business partners due to deficiencies either of omission or professional capacity.	A non-compliance of partners leads to a non-compliance of certified products in the organization	Focus on the completeness of the list of partners and not on their evaluation	Assessment of documents attesting that a proper evaluation of partners has been carried out
Ensuring accurate worker evidence	1.2.5	All	All	Law 53 of 2009 Updated on 4 October 2021 by GEO 117 of 2021 (Labour Code)	High	Possible	The inability of organisations to collect complete and accurate data on their workers	Lack of a systematic procedure for collecting data from all workers, regardless of the nature of the contract, inability of those responsible to update the data collected	The risk is severe as this is legally regulated and a breach of this clause could lead to a breach of the law.	Auditors might be tempted to see if there is a list of workers and if the data collected is complete, without verifying these data by objective evidence (identity cards etc.) if they are also current.	Training of auditors to verify including the data collected for day workers and to have an auditing technique that allows the verification of data based on objective evidence
Keeping documents and records for at least 4 years	1.2.9	All	All	EU legislation	High	Unlikely	Loss of all documents and records	Failure to provide a back-up system for documents and records	The risk is severe as this is legally regulated and a breach of this clause could lead to a breach of the law. However, the likelihood of occurrence was determined to be statistically very low.	Auditors often tend to audit only documents and records that are current and very close to the present time.	Train auditors to verify the archiving of documents according to the standard and legal provisions.
Ensuring competent human resources	1.2.16	All	All	NA	Moderate	Possible	Inadequate allocation of resources, decreased quality of the system	Either the assessment of the workers or the recording of their competences was done improperly. The employees were not actually trained but just signed some training protocols.	If competency mapping has not been done properly, resources could be misallocated, leading to poor quality.	The inability to match the competencies required for a particular position with the current qualifications of the occupant. Failure to collect objective evidence including, for example, interviewing staff.	Staff should be interviewed using the open-ended questioning technique in order to see if they are really competent for the job and have even taken part in training (not just signed some protocols).
Efficient management of sites under the umbrella of the administrator (valid for multi-sites)	1.2.17	All	All	NA	Low	Likely	Loss of control over sites	Poor management on the part of the administrator	Leads to loss of important information and loss of overview.	Not knowing which sites should be included in each administrator's list	Auditors should prepare themselves in the audit planning process by using the sites that should be included in the list of administrators.
An efficient internal inspection, self-assessment and sanction system is in place	1.4 (1.4.1 - 1.4.3)	All	All	NA	High	Possible	Failure to obtain initial certification or recertification due to insufficient preparation	Failure to understand the importance of own/internal evaluation and treat it superficially, failure to allocate adequate human resources, lack of a risk-based approach. Failure to implement adequate corrective measures that also fulfil a preventive function	Can lead to loss of certification or recertification by not effectively and timely detecting gaps and weaknesses in the system	Verification of internally audited processes only qualitatively, not quantitatively. Loss of focus on risk-based aspects. Leaving out of sight how corrective actions are implemented and whether continuous improvement is considered.	Auditors have to audit such complex processes as internal audit, management self-assessment and the sanctions system based on the "who-what-when-when/how often" series of questions. The risk-based approach should not be lost sight of.
A grievance mechanism is in place	1.5.1	All	All	Law No 363/2007 on combating unfair practices by traders in dealings with consumers and harmonising regulations with European consumer protection legislation	Moderate	Likely	The management system cannot be improved	Insufficiently trained human resources, lack of adequate communication system for reporting	Failure to implement a complaint management system leads to poor quality without the possibility of continuous improvement because problems are not noticed and addressed.	Focus only on the presence or absence of complaints and how they were handled, not on the system as a whole.	Understanding the functioning of the grievance system as a whole and checking the validation of the system by the organisation. The auditor may request an objective evidence validation tests of the system.
Gender equality	1.6 (1.6.1 - 1.6.2)	All	All	Romanian Constitution ARTICLE 41: Labour and social protection of labour (4) For equal work, women shall have equal pay with men; Law no. 229 of October 6, 2015 for the amendment and completion of Law no. 202/2002 on equal opportunities and treatment between women and men - Chapter II Equal opportunities and treatment between women and men in the	High	Possible	The working climate does not comply with legal provisions on gender equality at work, leading to potential lawsuits, problems with authorities, fines, etc.	Lack of involvement and accountability of top management in this issue. Lack of awareness of the issue with deep social and educational roots (Romania has a history of being a deeply patriarchal society).	Gender inequality and lack of awareness of the issue at a systemic level can lead to costly lawsuits, fines, loss of reputation in the labour market and more.	In general, it is difficult to detect if there are gender inequality issues within an organisation. Reasons include the fact that often even women are not aware that they are discriminated against.	The level of awareness of the entire staff, regardless of hierarchical function, and the way in which control is implemented in the labour market throughout the system must be tested. Interviews with staff using the open question technique are recommended as audit techniques.
Implementing an effective traceability system	Chapter 2	All	All	NA	High	Possible	Loss of control over assets	Lack of knowledge or equipment failure	Poor traceability leads to a loss of control over goods with economic implications, loss of all goods (not only those with problems), loss of reputation and credibility on the market, counterfeiting (giving away goods falsely as belonging to a certain category), etc.	Difficulties in interpretation arise from the lack of efficient implementation of the traceability system taking into account the particularities imposed by the RA	A good knowledge of the particularities of the requirements to be met by the specific RA traceability system. Conducting a proper traceability test taking into account both human and material resources.
Payment of Sustainability Differential & of Sustainability Investment	3.2 (3.2.3 - 3.2.7) & 3.3 (3.3.4 - 3.3.6)	All	All	NA	Moderate	Possible	Failure to assume liability and to invest sustainably by a timely payment	The desire to make profit without taking responsibility. Willingness to benefit from some RA certified products without paying as agreed for these benefits	Lack of payment leads to a decline in sustainability. Contractual clauses are breached with legal repercussions for offenders.	Lack of knowledge of contract terms, date when payment was to be made, arrangements to be made, payment.	Training on a good knowledge of the particular situation regarding payment (when, how, by whom, etc.)
NO CHILD LABOR, FORCED LABOR, DISCRIMINATION, WORKPLACE VIOLENCE AND HARASSMENT	5.1 (5.1 - 5.1.4)	All	All	Government Decision 600/2007 - The protection of young people at work Law 319/2006 - Occupational safety and health Law 53/2003 - Romanian Labour Code	High	Possible	Top management fails to properly manage CHILD LABOR, FORCED LABOR, DISCRIMINATION, WORKPLACE VIOLENCE AND HARASSMENT	Lack of top management involvement and monitoring of compliance with legislation. Employers' desire to profit by using cheap labour staff from disadvantaged social categories.	Non-compliance implies violation of legislation with criminal liability of the responsible persons.	Unreported and unrecorded cases from the past are difficult to verify. Uncovering such cases involves management involvement.	Open-ended questioning technique, investigating situations that may not have been reported. Interviewing employees at all hierarchical levels.
Ensuring freedom of association	5.2 (5.2.1 - 5.2.3)	All	All	Law 62/2011 - the law of social dialogue: 087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), Law 53/2003 - Romanian Labor Code C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111)	High	Possible	Employees are denied a right they should have and/or they are subject to discrimination or retaliation for reasons of past or present workers' organization or union membership or activities.	Top management's unwillingness and/or ignorance to facilitate and encourage this workers' right.	Non-compliance implies violation of legislation.	The documents may often present a picture that does not correspond to the real situation.	Open-ended questioning technique, interviewing employees at all hierarchical levels.

Ensuring fair wages and proper employment contracts	5.3 (5.3.1 - 5.3.9)	All	All	Law 53/2003 - Romanian Labor Code, Government Decision no. 938/2004 - the conditions of establishment and operation, as well as the procedure for the authorization of the temporary work agent	High	Possible	Workers are being unfairly treated through remuneration or contractual provisions that are inconsistent with the work performed and in violation of legal provisions.	Employer's unwillingness or ignorance	Non-compliance implies violation of legislation with criminal liability of the responsible persons.	Discrepancy between records and actual situation	Open-ended questioning technique, interviewing employees at all hierarchical levels.
Ensuring proper working conditions	5.5 (5.5.1 - 5.5.3)	All	All	Law 53/2003 - Romanian Labour Code, Ordinance no.53/2003 - related to maternity protection	High	Possible	Failure to respect workers' rights regarding working hours, overtime and maternity protection	Employer's unwillingness or ignorance	Non-compliance implies violation of legislation with criminal liability of the responsible persons.	Discrepancy between records and actual situation. In the case of maternity rights, the current lack of women benefiting from this protection does not imply the absence of conditions and regulation for such cases.	Open-ended questioning technique, interviewing employees at all hierarchical levels. Inspection of existing facilities for breastfeeding women and investigation of the conditions provided in case of such cases (when they do not currently exist).
Adequate environment to ensure health and safety at work	5.6 (5.6.1 - 5.6.14)	All	All	Law 319/2006 - related to occupational health and safety, Government Decision no.1425/2006 - Methodological norms to apply the provisions of the Law on safety and health at work no. 319/2006, Government Decision no.1091/2006 - on minimum safety and health requirements for the workplace	High	Unlikely	Health impairment of workers/pregnant women or women who have just given birth, endangering pregnancy or newborn child	Failure to provide a safe working environment either due to human error or defects in the equipment used.	Accidents at work or endangering workers in any way during working hours are particularly serious incidents, which, in addition to the ethical impact, have legal repercussions for the employer.	Without a proper risk analysis it is often difficult to assess situations that pose a danger.	Sound knowledge of risk management in the field of occupational safety and health. Open-ended questioning technique in interviews with workers at all hierarchical levels.
Efficient wastewater management	6.6 (6.6.1 - 6.6.2)	All	All	Government Decision no 188/2002 - approving some norms on the conditions of discharge of waste water into the aquatic environment Government Decision no. 532/2005 - amending and supplementing Government Decision no. 188/2002 for the approval of certain norms regarding the conditions of discharge of waste water into the aquatic environment	Moderate	Possible	Contamination of surface and underground water by the infiltration of untreated wastewater before spillage.	Lack of expertise in industrial wastewater treatment, lack of knowledge and/or human error	Can lead to public health problems, environmental pollution, violation of legal provisions with legal consequences	Inconsistency between the documentation and the situation on the field	Verification of the water management plan [waste and drinking water] Results of analyzes of industrial wastewater and surrounding waterways and soils Observation Industrial wastewater discharge areas Check the characteristics of the soil where the wastewater is poured, the slope

Certification body:
Country:
Date submitted:
Control person:
(Risk = risks to non-compliance)

BUREAU VERITAS CÔTE D'IVOIRE	Date reviewed:
BENIN	Reviewed by:
16/04/2024	Approved by:
AKA MARI BEHÉ	Date approved:

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Compliance topic		Related standard requirement	Crop(s)	Region(s)	Lois	Severity	Likelihood	What are the root causes	Why is this risk so important?	Interpretation challenges / Difficultés d'interprétation	Auditing technique to detect & reduce risks
Management capacity	1.1.1	pineapple, oil palm, anacarde	All growing area			Significant	Likely	Les membres du groupes n'ont pas encore saisi l'importance de la certification et de ce fait s'intéresse très peu à l'agriculture durable et de la conformité à la présente norme les lois applicables ne sont pas connues - la plupart des groupes n'ont pas un plan de gestion bien défini	Ne favorise pas l'adoption des règles de durabilité dans les décisions de gestion	Les règles de fonctionnement sont définies théoriquement mais non opérationnelles	Les outils d'évaluation de la capacité de gestion doivent être conçus conformément aux normes de durabilité - Former un comité interne chargé de vérifier la conformité des normes - allouer un budget spécial pour le suivi de la mise en oeuvre du plan de gestion - prendre en compte la participation des acteurs - le comité doit évaluer et surveiller régulièrement la conformité aux normes de certification
Location of production areas	1.2.1	All crops	All growing area		Loi n°93-009 du 2 juillet 1993 portant régime des forêts LOI No 87-014 du 21 Septembre 1987 portant réglementation de la protection de la nature et de l'exercice de la chasse en République du Bénin	Significant	Likely	Les zones de production ne sont pas identifiées - l'absence d'un cadastre national - Les limites des zones protégées ne sont pas clairement délimitées	Plusieurs producteurs exploitent clandestinement les forêts protégées et ne respectent pas la présente norme	Difficulté d'identifier la zone de production - les lois applicables en la matière ne sont pas connues par les exploitants	- Une carte actualisée de la (des) zone(s) de production doit être établie y compris les zones de production, les zones protégées, les masses d'eau et les établissements humains, à proximité des limites de l'exploitation. - Tenir à jour un registre des membres du groupe, comprenant pour chaque membre du groupe les données de localisation
Services providers	1.2.2	anacarde, riz, soja	All growing area			Significant	Likely	- Le recrutement des prestataires n'est basé sur aucun critère prédéfini	- Les prestataires de service n'étant pas formés sur les normes, leurs prestations ne seront donc pas adéquat avec les normes, ce qui revient à la charge du groupe.	Les prestataires ne sont pas formés sur la spécificité des services à offrir	Quelque soit le processus de sélection et de recrutement des prestataires, ces derniers doivent être formés sur les spécificités des services
Group member registry	1.2.4	Cocoa, coffee	Cocoa and coffee growing area		Acte uniforme OHADA du 15 décembre 2010 - Droit des sociétés coopératives	Significant	Very Likely	- Internal inspections were not carried out completely; - Internal inspection reports are not filed in correctly - Group administrator is not competent - Insufficient work equipment (GPS, rolling stack) - The register may contain fictitious members - The registry can contain members who are registered with several certified groups	(Traceability problem) Possible mixture of cocoa; impossible to control the production potential; possibility of situation of the plantation in a protected area (IWC destruction)	- The sometimes high number of producer files put in place; - Unavailability of GPS; - Low respecting unclassified register - The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups - The declaration of areas during audits and almost always different from the areas in the registers."	RA provided Guidance Document C - Checks of internal inspection sheets, verifications of the membership register, cocoa delivery interview with some producers; internal inspectors, the storekeeper or purchasing manager. - Delimitation of plot
Correct Geolocation data and farms polygons	1.1.11 & 1.2.12 & 1.2.13	Cocoa, coffee	Cocoa and coffee growing area			Severe	Very Likely	The CH's don't know how to use technology, how to use application for checking	Makes it difficult to confirm that there is no certified culture in protected area. And to get the actual farm size.	- The sometimes high number of producer files put in place; - Unavailability of GPS; - The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups - The declaration of areas during audits and almost always different from the areas in the registers."	- Previous analysis of GPS coordinates and different images sources. - Check if internal inspectors can read and verify a determinate number of GPS coordinates and farms size - RA provided Guidance Document F
Risk assessment	1.3.1 & 1.3.2	Palmer à huile, riz	All growing area		Décret N° 2017-332 du 06 juillet 2017 portant organisation des procédures de l'évaluation environnementale en République du Bénin.	Significant	Likely	- L'évaluateur de risques non conforme aux prescriptions de la présente norme - l'évaluation n'est pas participative - toutes les étapes de l'évaluation des risques n'ont pas été suivies - les données collectées ayant servi à l'évaluation sont faussées - Falsification du rapport d'évaluation des risques - Sous estimation des risques - surestimation des charges affectées - détournement index fonds	- Les résultats d'évaluation non valables - Violation des lois environnementales et non convergence des résultats d'évaluation de risque - Efficacité des plans de gestion déclinant les domaines d'ambition et les mesures à prendre élaborés par la direction à partir du rapport d'évaluation.	- Difficulté dans l'application des mesures d'amélioration élaborées - incohérence entre les mesures d'amélioration et la législation et les normes de durabilité - Mauvaise connaissance des réalités du secteur d'activité	- Sélectionner et former les évaluateurs - Instaurer la triangulation dans les outils de collecte de données - Créer des codes de concertation pour prendre en compte les avis des participants - Réaliser aus des comptes évaluations pour confronter les résultats
Quality of internal inspection	1.4.2	Cocoa, coffee	Cocoa and coffee growing area			Significant	Very Likely	- Lack of money to equip and pay internal inspectors - Internal inspectors have other occupations than the group activities - difficulties to find qualified persons in villages	- Insufficient monitoring of farmers. - Incomplete understanding of the requirement by the member	- The groups do not have the same farms spatial distribution - what are minimum qualifications and competencies for internal inspectors?	- RA fixed a ratio between internal inspectors and farms - Check if internal inspectors can read and write - Check if they went to school - Confirm with farmers if inspectors really conduct activities and give information concerning the standard
Gender equality	1.6.1	Cocoa, coffee, Banana, mangoes, pineapple	All growing area			Severe	Very Likely	- Women are just considered in food crops - Some persons don't know that gender concern men also	- Women are less trained - no improvement in women income. - Sometimes men are forged in activities to promote gender equality	- The standard do not specify clear action to promote gender equality. - What can be considered as sufficient for gender equality promotion?	- RA provided guidance document G - Check by interviews and documented proofs what was done for men and women according to their needs
Mixing of certify and non certify product	2.1	Ananas, anacarde, palmiers à huile	growing area		- Décret N° 85-244 du 14 Juin 1985 relatif à la définition des conditions de production et de commercialisation de denrées alimentaires particulières - Loi n° 2007-21 du 14 octobre 2007 portant protection du consommateur en République du Bénin et n° 2016-25 du 04 novembre 2016 portant organisation de la concurrence en République du Bénin.	Significant	Likely	- Insufficient traceability system in place to manage the flow of certified products. - Insufficient training for those involved in registering certified product flows. - Fraud - Lack of a mechanism for identifying certified products. - Payer fraud - No indication on packaging of certified products - Non-existence of members - inaccurate surface area values - Double registration of plots - Parallel sales	- Integrity of certify product - To prevent the product sold from being superior to the product harvested and to avoid all kinds of risks of mixing. - Attention of the media and denunciation of the media on fraudulent acts in the traceability process	- Lack of credibility of acreage data and estimation of farm yields - The non-conservation of traceability documents by producers and their ease of forgetting sales information	- Guidance document provided by RA H - Training for producers and players in the traceability system - Georeferencing farm plots - Farm visits - Digitization of traceability system using bloc chain technology - Estimate average yields from yield squares - Map all group members' plots - Rainfall history and forecast
Equipment used to define the weight	2.1.9	Cocoa, coffee	growing area		Décret N° 2019-327 du 10 avril 2019 portant approbation de la délégation de service public de service de métrologie légale portant sur les vérifications primaires et périodiques d'appareils et instruments de mesure	Severe	Very Likely	A national law designated only one structure for calibration of equipment used to define the weight! This structure don't take annually calibration as strict requirement	Large differences in weight between producers, cooperatives and exporters can result from this lack of calibration. The producer will always be the loser	Compliance with RA standard or national law?	- Check weigh difference if it is significant - Check if the group tests its scales itself at regular intervals - Give a non-compliance if the farmer is the loser
Controlling production costs	3.1.1	All crops	growing area			Significant	Likely	Asymmetric information on input markets - Diversity of supply sources for factors of production	The quality and price of production factors can strongly influence the group's yield and production costs.	Difficult access to approved inputs - Rising prices for production inputs	- Encourage group members to buy inputs together - Encourage group members to sell together to make better choices
Living income	3.1.2	Palmer à huile, riz, ananas, anacarde	All growing area			Minor	Possible	- Daily labor rates are not fixed - Living income is not define in the country - Living income is not well known by actors	without reference, groups will not know how to approach this requirement		- RA developed the annex 5 - Knowledge of living income for each country
Sustainability Differential	3.2.1	All crops	All growing area			Significant	Likely	- Lack of transparency in transactions - Fraud - Corruption of responsible members	- Certified producers do not receive the sustainability difference in the form of a monetary transfer as advertised.	- Most producers do not know the certified quantities sold - It is difficult to reconcile the amounts received because the Sustainability Differential is sometimes paid quarterly - Sometimes during audits Sustainability Differential are not yet been paid	Possibility to fix a rate to confirm interview from producer in term of percentage that lead to non conformity
Selection of plant varieties for planting, grafting and renovation	4.1.1	Cocoa	growing area		Communication du conseil café-cocoa	Severe	Very Likely	These actions are prohibited by the national management office to avoid overproduction	Most of Farms are less productive and cocoa trees are old	How to evaluate control points concerning farm management (pruning, renovation, weeding etc.)	
Privileged Use of inorganic fertilizers	4.4.4	Cocoa, coffee, Banana, mangoes, pineapple	All growing area			Severe	Very Likely	- More availability compared to organic fertilizer - Easy use compared to organic fertilizer	- soils have no good structure - Inorganic fertilizers are washed out in water bodies		
Sustainability investment	3.3	All crops	All growing area			Moderate	Possible	Sustainability investment needs not clearly defined	Low mobilization of financial resources will hamper implementation of standards	Overestimated needs	Check the investment plan every month

	Pest management	All crops	All growing area	DÉCRET N° 2018. 172DU 16 MAI 2018 fixant les modalités d'application des règlements communautaires sur l'homologation des pesticides en République du Bénin.	Significant	Likely	Pests are all at the roof of low crop yields. - Poor quality insecticides damage crops	Pest damage is a major loss for growers	Difficulty identifying approved, quality products	Build producers' capacity for sustainable pest management	
	Prohibited agrochemicals	4.6.1 pineapple	pineapple area		Moderate	Possible	- Prohibited pesticides are cheaper and accessible on the markets. - The low price of pesticides sold in the villages by itinerant and local traders. - Producers are not trained on good agricultural practices or are not aware of the danger associated with the use of its products. - Fraud. - The real products used in secret by the producers do not appear on the list of products used by the group. - The insufficient number of applications.	- The producers themselves have to spray their plantations without the knowledge of the group's leader; - Environmental contamination and human health problem. - Possibility of contamination of the bean (LMS). - The interviewed farmer is neither able to give the real names of the pesticides used, nor to explain the procedure for using these products. - The interviewed farmer is neither able to give the real names of the pesticides used, nor to explain the procedure for using these products.	- The interviewed farmer is neither able to give the real names of the pesticides used, nor to explain the procedure for using these products. - The real products used in secret by the producers do not appear on the list of products used by the group.	- RA provided Annex 7 - Analysis of the application register of applicators from the previous year. - Interview with laborers, family members, neighbors	
	Post-harvest losses	4.7.1 Palmier à huile, riz, ananas, anacarde	All growing area		Significant	Likely	- Inadaptation des outils de récoltes - Dégradation des voies	- Post-harvest losses have a negative impact on profitability - Poor management of post-harvest operations affects product quality	- Pas de directive en la matière		
	No want farms of child labor	5.1 anacarde, riz, soja	growing area	Loi no 98-004 du 27 janvier 1998, portant code du travail.	Significant	Likely	- Lack of workers. Need to reduce production costs - Easy labor - Absence / Distance from school - Parents' refusal to send the child to school because of field work. - Poverty	- Non respect du droit de l'homme - Violation de la législation en vigueur	- The scourge on child labor does exist, however, audit reports rarely take it into account. - Farms are rid of children during audits - It is difficult to detect the case of child labor because of the complicity of parents who hide and cover them up	- Check if there is a procedure to fight against child labor - Check if a committee exists, intervene the committee - Interviewed workers - Check whether the risk assessment takes into account the issue of child labor - Check workers' identity documents - Interview the minor workers met during the visits - Check the presence / proximity of schools	
	minimum wage or the wage negotiated in a Collective Bargaining Agreement	5.3.3 anacarde, riz, soja	growing area	Loi no 98-004 du 27 janvier 1998, portant code du travail.	Significant	Likely	Minimum wage in agriculture sector is not well known. The employment rate is high. Agriculture is not enough profitable for smallholders	Many workers are receiving less than the national minimum wage, which is low in agriculture sector.	workers refuse to answer these types of questions at the risk of losing their jobs	- Interviews and verification of pay slips - Check the employment contract	
	Workers' working hours	5.5.1 anacarde, riz, soja	growing area	Loi no 98-004 du 27 janvier 1998, portant code du travail.	Minor	Possible	Working hours are not registered	Many workers work more than authorized working hours in pic season	workers refuse to answer these types of questions at the risk of losing their jobs	- Interviews - Check The employment contract	
	Overtime work	5.5.2 anacarde, riz, soja	growing area	Loi no 98-004 du 27 janvier 1998, portant code du travail.	Minor	Likely	Working hours are not registered	For many workers, overtime work are not paid	It is difficult to verify the veracity when all overtime, there is no register which traces the working hours of the employees, the pay slips of the employees are not archived on the site of the company.	Check the pay slips or slips of all employees, interview with the managers of the company (HRD, accounting), the different categories of employees.	
	Polygons are available for all farm units of 4ha and above. Geolocation points are available for all other farm units.	EUDR1	Cocoa, coffee.	Cocoa, coffee growing area	Loi n° 2002-14 du 18 octobre 2004 portant régime de la faune en République du Bénin Loi n°2022-14 du 19 juillet 2022 portant orientation agricole, sécurité alimentaire et nutritionnelle en R8	Significant	Very Likely	The CH's don't know how to use technology, how to use application for checking	Makes it difficult to confirm that there is no certified culture in protected area. And to get the actual farm size.	- The sometimes high number of producer files put in place; - Unavailability of GPS; - The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups - The declaration of areas during audits and almost always different from the areas in the registers.	- Previous analysis of GPS coordinates and different images sources. Equip audits for the verification of a determinate number of GPS coordinates and farms size RA provided Guidance Document F
	Geolocation data for both points and polygons must have 6 decimals.	EUDR2	Cocoa, coffee.	Cocoa, coffee growing area	Loi n° 2002-14 du 18 octobre 2004 portant régime de la faune en République du Bénin Loi n°2022-14 du 19 juillet 2022 portant orientation agricole, sécurité alimentaire et nutritionnelle en R8	Significant	Very Likely	The CH's don't know how to use technology, how to use application for checking	Makes it difficult to confirm that there is no certified culture in protected area. And to get the actual farm size.	- The sometimes high number of producer files put in place; - Unavailability of GPS; - The absence of a national register to control the reliability of the identity of producers, duplicates and membership of several certified groups - The declaration of areas during audits and almost always different from the areas in the registers.	- Previous analysis of GPS coordinates and different images sources. Equip audits for the verification of a determinate number of GPS coordinates and farms size RA provided Guidance Document F
	Management implements measures to prevent and address potential cases of corruption (including bribery and extortion), fraud and nepotism by: - A written public statement that is communicated to group members/workers and supply chain partners. - Training of management and workers/group members to raise awareness of possible forms, at least annually. - Taking measures to avoid, and to remediate cases	EUDK3	Cocoa, coffee.	Cocoa, coffee growing area	LOI N° 2011-20 DU 12 OCTOBRE 2011 portant lutte contre la corruption et autres infractions connexes en République du Bénin.	Significant	Likely	lack of money	we cannot trust everything he has put in place as an activity.	document authentication difficulties	-stakeholder interview -verification of contracts between the CH and the service providers
	Management shows evidence of payment of all applicable fees, royalties, taxes and other charges as prescribed by local laws and regulations.	EUDR4	Cocoa, coffee.	Cocoa, coffee growing area	code general des impôts 2024	Significant	Possible	lack of money	We run the risk of certifying a CH which does not comply with the laws of the country	knowledge of the taxes applicable to different types of CH	verification of proof of payment