RULES FOR CERTIFICATION AND AUDIT

ABR CERTIFICATION PROGRAM

ABRAPA
ASSOCIAÇÃO BRASILEIRA DOS PRODUTORES DE ALGODÃO

ABR
ALGODÃO BRASILEIRO RESPONSÁVEL
RESPONSIBLE BRAZILIAN COTTON

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1. CERTIFICATION RULES

1.1. CANDIDACY OF CERTIFICATION COMPANIES

Candidacy occurs between October and December of each year, when audit bodies must prove to Abrapa and state associations that their auditors are duly qualified to perform their duties and carry out high-quality audits of cotton-producing farms.

For a certification body to offer reliable certification, it must be impartial and perceived as such.

To obtain and maintain trust, it is essential that its decisions be based on objective evidence of compliance or non-compliance and not be influenced by other interests or other parties.

The certification body must also:

- Identify, analyze, and document the possibilities of conflicts of interest arising from the provision of certification, including any conflicts resulting from its relationships;

- Demonstrate to Abrapa and state associations that it is accredited by an accreditation body that is a signatory of the IAF (International Accreditation Forum) and therefore meets the standards and regulations that allow it to audit and grant certifications;

- The certification body must be accredited by INMETRO under ISO/IEC 17065;

- Prove the competence of its auditors, who must meet the minimum requirements established by the ABR program and be qualified through technical competence, specific training, and relevant experience for the ABR certification process.

Other requirements, criteria, and duties regarding the relationship with Abrapa and state associations are contained in the Accreditation Contracts between these associations and the accredited certification companies.

1.2.
ROLE OF THE INDEPENDENT AUDITOR

Auditors represent the credibility of the ABR program on cotton-producing farms. They play a vital role in providing information to state associations and significantly influence the ABR certification process.

The basic role of the auditor is to be an independent collector of facts and evidence. This must always be explained and clarified to farm managers. At no point should the auditor debate results with managers or seek to convince them of anything. It is their responsibility to ensure that the verification for the purposes of rural property certification proceeds without issues.

Specifically, for the lead auditor, the following tasks are assigned:

- Conducting opening and closing meetings;
- Assigning specific duties to other auditor(s), if more than one auditor is required in the field;
- Making the final decision on controversial issues;
- Managing time during the audit and during the preparation and drafting of reports;
- Approving the report before submission to the state association, writing it if necessary.

Auditors must seek new methods for verification and contribute to the improvement of the verification protocol. State associations value field feedback and the perspective of evolution that only auditors can provide.

1.2.1.
AUDITOR STANDARD OF CONDUCT

Auditors must conduct their activities in compliance with the auditing principles established in ISO 19011, which include integrity, fair presentation, due professional care, confidentiality, independence, and an evidence-based approach.
It is essential that auditors act with cordiality, respect, impartiality, and professionalism, ensuring the reliability of the audit process. Their decisions and practices must reflect a strong commitment to ethical principles.
All ABR program audits must be carried out independently and impartially, ensuring that conclusions are based on objective evidence. Any occurrence that does not comply with these guidelines must be duly recorded in the audit report by the audit team.

1.2.2. AUDITOR QUALIFICATION

The auditor must possess or acquire the following qualifications prior to performing the rural property verification for ABR certification:

- **Education and work experience:** they must have successfully completed higher education—preferably in agricultural or environmental sciences—or technical education in agriculture, human resources, occupational safety, environment, or occupational health; or have proven work experience in agricultural activities and agribusiness, so as to possess knowledge of the context and prevalent issues that require greater sensitivity or deeper investigation into cotton production activities, as well as the cultural and social conditions of the region where the audit will be conducted;

- **Knowledge of laws:** they must have thorough knowledge of or be qualified and trained in national laws and standards applicable to labor relations and environmental compliance, specifically focusing on the items of the Property Certification Checklist (VCP);

- **Knowledge of the ABR program:** the certification body must have proven participation in ABR program training offered by Abrapa or a state association every harvest. In the training, certification body representatives must acquire knowledge about the program criteria and the correct filling of forms and reports. Training will be conducted preferably in Brasília, Federal District, or via webinar.

Trained representatives commit to passing on this knowledge to other auditors of the certification body involved in the ABR program. Compliance with this requirement will be evidenced through attendance lists and other evidence such as teaching materials, photographs, etc.

- **Auditing knowledge:** the auditor must demonstrate the ability to competently perform specific conformity assessment processes, including knowledge of techniques for conducting worker interviews, reviewing and analyzing records and documents, and physical verification of workplaces, machinery, vehicles, and equipment, in addition to other auditing techniques. Knowledge must be proven through respective certificates.

2. AUDIT RULES

The external verification process aims to evaluate the farm's compliance with the Brazilian Responsible Cotton Program (ABR) criteria and the accuracy of reported information, according to the guidelines in the **ABR Program Technical Compliance Guide**, supported by the **ABR Regulations**, ensuring the credibility of the certification.

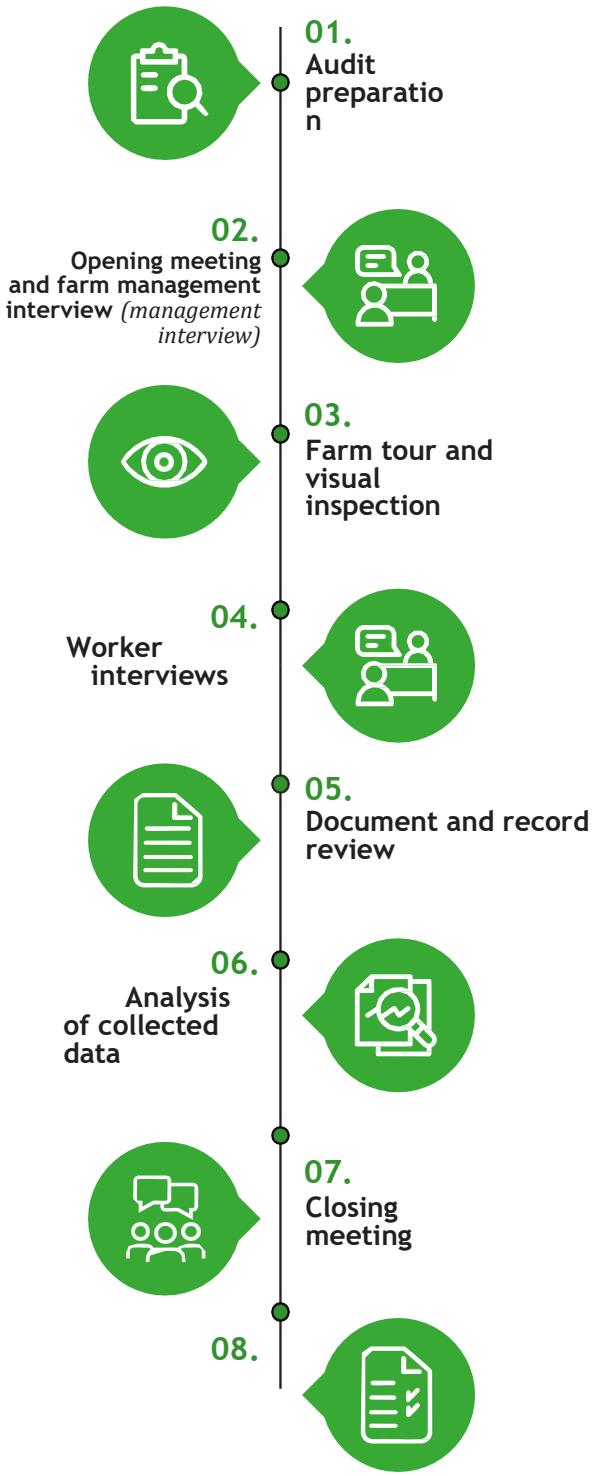
External verification is performed *in situ*, and information is obtained from interviews with farm management and workers, visual inspection and observation, and the checking and analysis of documents and records.

The success of each verification depends heavily on the collaboration of farm management in providing full access to the property and pertinent records, as well as releasing workers for interviews. It also depends on the quality of work performed by the auditors designated to conduct the independent verification visits.

Finally, audit quality is related to its preparation, the auditor's technical skills and knowledge, and full knowledge of the ABR program, especially its criteria, certification parameters, and checklists.

2.1. OVERVIEW OF THE EXTERNAL VERIFICATION PROCESS

The overview of the verification process, whose main steps are shown in the figure below and detailed thereafter, is intended to guide the auditor in the performance of their duties.



Report preparation and submission

2.2. GENERAL REQUIREMENTS

Certification companies must follow these requirements to ensure that audits are conducted in a structured and consistent manner, providing accurate information about the audited production unit. The following points must be taken into consideration:

- In each audit, the certification company team must adhere to and effectively apply the principles, practices, and guidelines established in the latest version of ISO 19011;

- The certification company must always ensure sufficient resources are allocated, including time, for its personnel to perform the tasks assigned in the certification process. This includes time for the team to effectively carry out audit activities, including, but not limited to, audit preparation, execution, and/or reporting activities to gather all required evidence to deliver an accurate audit report;

- The audit team must develop an audit plan for each external evaluation. The lead auditor shall be responsible for the quality and execution of the audit plan;

- The audit plan must detail the sequence of activities clearly and comprehensively, ensuring total coverage of the audit scope. The objective is to ensure that both the compliance of the Production Unit (PU) and the effectiveness of the management system are duly verified;

- The lead auditor must ensure that the audit plan includes, at a minimum, the following elements:
    1. Audit objectives;
    2. Audit requirements;
    3. Audit scope, including the identification of the organizational and functional units or processes to be audited;
    4. Audit dates;
    5. Locations and structures to be visited;
    6. Planned duration of the audit at each location;
    7. Approximate time and duration of each audit activity during each audit day;
    8. Declaration of absence of conflict of interest, commitment to confidentiality, anti-bribery, and/or anti-corruption policies, both generic and specific to the audit;
    9. List of the main documents or groups of documents that must be readily available for the audit.

2.3. CERTIFICATION AUDIT

An audit must include, at least, the following elements:

- Opening meeting;
- Visit to the property's facilities;
- Visit to the field and native vegetation areas;
- Verification of records, policies, documented procedures, HR practices, and other documentary evaluation activities related to the program's scope;
- Interviews with the production unit's administrative team;
- Interviews with workers, worker committees, worker representatives, service providers, labor suppliers, and other persons involved in the certification, if applicable;
- Triangulation of information collected before the closing meeting;
- Determination of audit results among the audit team members;
- Closing meeting.

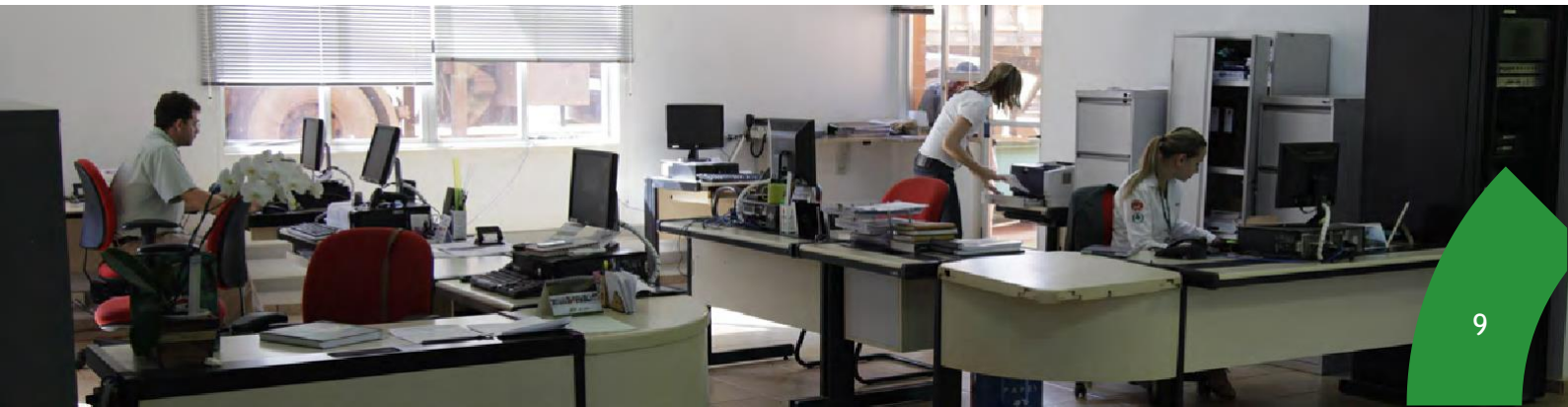
2.3.1. CONDUCTING AN OPENING MEETING

The certification company's audit team must ensure that each audit begins with an effective opening meeting, conducted by the lead auditor.

An opening meeting must include, at least, the participation of the audit team and key personnel from the production unit.

The following elements must be considered:

- Presentation of the audit team with clear roles and responsibilities;
- Confirmation of the audit plan and that all planned activities can be carried out;
- Indication of the situations under which the audit may be interrupted.



2.3.2.
FACILITY VISIT

The purpose of the facility tour is to allow the audit team to observe the physical conditions and current practices in all areas and installations to form a view of the conditions and practices that correspond to the standard's requirements. The tour is also an opportunity to establish unstructured conversations/interviews with management and workers and to seek local evidence to support conclusions.

The results of the tour will later be triangulated with evidence from management/worker interviews and document reviews.

2.3.3.
VISIT TO THE FIELD AND NATIVE VEGETATION PRESERVATION UNITS

Visits to crop areas are fundamental to identifying possible deviations that cannot be detected through documentary evaluation. In these areas, it is essential to verify if conservation practices are being effectively implemented and if operations involving workers are being conducted in compliance with applicable regulations. These are just a few examples and do not limit the scope of what should be evaluated. Furthermore, preservation areas must also be inspected. In these areas, it is crucial to prove that native vegetation is duly conserved and protected, ensuring the property's environmental integrity.

2.3.3.
CONDUCTING A CLOSING MEETING

The certification body must conduct a closing meeting with the participation of at least the audit team and those responsible for accompanying the audit of the Production Unit (PU).

The closing meeting must include, but is not limited to, the following elements:

- Explanation that the audit process used a sampling approach;
- A short summary of the UP's positive points and good practices, if applicable;
- Explanation of all audit results in language that is accessible for participants to understand;
- Deadline for the UP to respond to audit results, such as the deadline for correcting minor NCs (Non-Conformities);
- Reiteration of confidentiality;
- Information on the appeals procedure for the certification company.

2.3.4.
QUALITY REVIEW

After the closing of the audit report, the checklist, necessary data, and evidence of NC closure must undergo a review to ensure the quality of the final report and the approval of the production unit.

The certification company's audit team must ensure that the evidence for all applicable requirements—both conformities and non-conformities—is described in a clear, concise, and objective manner, accurately reflecting the nature, magnitude, and correct technical basis of the (non)conformities in relation to the Standard.

The description of evidence for audit results (compliance/non-compliance) must allow another person to verify the same evidence and reach the same conclusion. Descriptions must refer to specific documents and records evaluated, for example: payroll from March to September 2024; grievance procedure SGI-PQ-05, issued on June 8, 2024; minutes of OHS committee meetings dated August 21, 2024.

2.3.5. ISSUANCE OF CERTIFICATES

At the end of the audit, the certification company shall present participants with a preliminary summary of the results and conclusions, indicating whether or not they are eligible for certification.

Within 30 calendar days, the certification body must register, through the ABR system, the results regarding the production units qualified in the certification process. If the farm meets the program's minimum requirements, the certificate will be issued by the certification company via the ABR system. Once the production unit verifies the certification approval in the ABR Program management system, it will have access to the certificate.

3. VERIFICATION PROCESS DEADLINES

The deadlines for executing the various stages, from the audit to the issuance of the ABR Certificate of Compliance, vary depending on the situation and are described below:

- Farm not eligible for certification: If the certification body identifies that the farm is not eligible to be certified, the process will be closed with the presentation of the audit report, which must be issued **within 7 (seven) calendar days.**

- Minor non-conformities: If the certification body concludes that the farm presents minor non-conformities that could compromise approval, the unit will have **up to 15 (fifteen) calendar days** after the close of the audit to correct the deviations. After receiving the evidence of correction, the certification body will have up to 5 (five) days to evaluate it and decide whether or not to recommend the farm for certification, finalizing the Preliminary Compliance Verification (VCP) process. If approved, the certificate must be issued in the ABR system **within 30 (thirty) days after approval.**

- **Farm approved for certification:** if the certification body concludes that the farm is eligible for certification, the certificate must be issued by the ABR system within **30 (thirty) calendar days.**

Photos: Abrapa/ Carlos Rudiney (Marcplus)

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