



# FSA Third Party Verification System Requirements for FSA Verification Bodies and Auditors

Version 1.2, March 2020

## 1 Introduction

The purpose of this document is to ensure quality and consistency of the verification approach by all auditing bodies.

This document describes the procedures and the requirements by which SAI Platform will approve a Verification Body to carry out Third-Party Farmer Sustainability Assessment (FSA) Verification Audits. Only Verification Bodies that are approved by SAI Platform may carry out FSA Verification Audits and issue recognised FSA Letters of Attestation.

The document describes the requirements for FSA Verification Bodies, including competency requirements for Scheme Managers and In-house Trainers, and revised requirements for FSA auditors, who are now classified as FSA Principal Auditors and FSA Associate Auditors. This document does not describe the application and approval process for VBs, which is covered in a separate document. It also does not cover the ongoing training, and integrity programme requirements. These will be published during 2020.

Guidance on the Third-Party Verification Audit procedure is provided in the FSA Implementation Framework and Third-Party Verification Guide. Links to all documents mentioned in the text can be found in Section 10.

### 1.1 Purpose of FSA Verification

FSA is not a compliance programme, and FSA Third Party Verification is not a compliance audit. Companies are free to determine their required FSA performance level, if any, and which options are best suited to their supply chains. Farms and Farm Management Groups can make Performance Level Claims to whichever FSA performance level reflects their current performance level. Third Party Verification is required in order for anyone in the supply chain to make external claims regarding the FSA Performance Level of their Farm, Farm Management Group or supply chain.

The purpose of the Verification Audit is to confirm the FSA Performance Level Claim that can be made by the Farm or Farm Management Group, by verifying that:

1. the FSA self-assessments have been completed correctly by the farms, and in accordance with the requirements of the FSA Implementation Framework
2. there is a Farm Management System in place to track the volumes produced and sold by the farms(s) and deliver a continuous improvement management system in accordance with the requirements of the FSA Implementation Framework.



## 1.2 Principles of FSA Verification

### 1.2.1 Role of the Auditor

As well as providing independent, impartial verification of a farm or farm group's FSA performance level, SAI Platform encourages FSA auditors to play a role in encouraging farmers to improve their performance. This includes raising awareness of best practices and identifying opportunities for improvement. We ask auditors not to adopt an adversarial or 'compliance' approach to auditing, but to work with farmers to make a fair assessment of where they are on their sustainable development journey.

### 1.2.2 Triangulation

It is important that the auditor adopts the correct approach when determining whether a practice aligns with the answer reported in the self-assessment or not. Rather than only looking for hard evidence, auditor must apply "triangulation of information" obtained from different sources both at the Farm Management Group and on-farm.

- Interviews to verify the level of awareness of policies, practices or management systems
- Observation to verify whether (farm) practices align with the self-assessment
- Documentation to verify the claim against records of implementation

Triangulation of information from different sources is especially important when auditing small scale farmers as these typically will not have hard evidence of farm practices. For example, records of integrated pest management will most likely not be available, even though farmers might implement such practices and these can be observed on-farm.

### 1.2.3 Risk assessment

Risk assessment is a key component of the preparation for an FSA verification audit. The purpose of the risk assessment is to help the auditor to:

- place particular emphasis in the audit on those topics that are most important or where there is greatest risk of non-compliance with FSA requirements
- adjust the burden of proof to reflect the risk of non-compliance

### 1.2.4 Continuous improvement

Third party verification sits alongside farmer engagement, gap analysis, action planning, and farmer training and support in the FSA toolkit to support continuous improvement in sustainable agriculture. For information on these please go to <https://saiplatform.org/fsa/>

## 2 Verification Body Requirements

### 2.1 General

A Verification Body pursuing FSA audits must have a licence agreement in place with SAI Platform (or an organisation appointed by SAI Platform to manage the Approval Process), confirming the ability and competence of the organisation.



Only Verification Bodies that are approved by SAI Platform (or an organisation appointed by SAI Platform to manage the Approval Process) may carry out FSA Verification Audits. SAI Platform (or an organisation appointed by SAI Platform to manage the Approval Process) shall, as part of its enforcement of the license agreement, ask the Verification Body to provide sufficient evidence that it can meet the requirements as set out in this section.

## 2.2 Experience

The Verification Body must have at least 3 years' proven experience in auditing sustainability standards in the agricultural and food supply sector, as a licensed certification body for at least one scheme approved by SAI Platform as demonstrating FSA Silver benchmarked verification experience. For a list of recognised schemes please see the current "List of Verification Audit Schemes recognised by SAI Platform in the VB Approval Process" available on the [GLOBALG.A.P. Website](#).

## 2.3 Audit Management Systems

A quality management system must be in place to control the FSA Verification Audits. The Verification Body must be ISO/IEC 17065 accredited for an FSA recognized standard, or must apply for accreditation at the same time as applying for approval to be an FSA VB. The certificate must be issued by an accreditation body that is recognized by GLOBALG.A.P. For a list of these accreditation bodies, please see this [link](#). For a list of recognised schemes please see the current "List of Verification Audit Schemes recognised by SAI Platform in the VB Approval Process" available on the [GLOBALG.A.P. Website](#).

A VB that has no previous ISO 17065 accreditation and has applied for one, has to present proof of accreditation within 6 months of approval. This period can be extended with the confirmation of the respective accreditation body. If a VB does not manage to obtain accreditation in the given period or the accreditation of a VB is suspended by the accreditation body, SAI Platform reserves itself the right to also temporarily suspend the VB.

The Verification Body must have procedures in place to ensure correct implementation of the requirements of the Third-Party Verification Guides and the Implementation Framework in the execution of FSA Verification Audits.

The Verification Body must have a system in place to monitor follow up and completion of audits.

The Verification Body must have a system to track all FSA audits completed, and must share this information with SAI Platform (or an organisation appointed by SAI Platform) upon request.

The Verification Body must keep records of verification audits for a period of at least 6 years (2 audit cycles) after the report is finalised. Documentation obtained as a result of the audit shall be kept in a safe location to ensure confidentiality.

## 2.4 Impartiality

Where the Verification Body is part of an organization involved in activities other than audit, the Verification Body must be separate from the other functions.



Impartiality of audit personnel and confidentiality of information obtained during audit activities must be maintained.

A Verification Body may not provide paid FSA consultancy services to an organisation for which they provide FSA verification services.

## **2.5 Personnel and training**

The Verification Body must have processes in place to ensure that auditors carrying out FSA Verification Audits meet the requirements in terms of training and experience to ensure that they possess the knowledge, skills and experience required.

The Verification Body must have a sufficient minimum number of qualified staff to be able to run the FSA verification audits. Each VB needs a Scheme Manager, an In-House Trainer, and at least one FSA Principal Auditor. The Scheme Manager and the In-House Trainer can be the same person.

The Verification Body is responsible for the implementation of updates on the FSA, and the training and harmonisation of auditors concerning these updates. The Verification Body must keep a record of all FSA training and updates received by each auditor in order to demonstrate ongoing competence of all auditors if requested by SAI Platform (or an organisation appointed by SAI Platform to manage the Verification Body Approval Process).

## **2.6 Insurance**

The Verification Body must have sufficient insurance coverage for delivery of audits in their particular market. The VB shall present to SAI Platform (or their appointed representative) proof of a “professional liability insurance”. VBs based or operating in USA and/or Canada shall also present proof of “comprehensive general liability insurance”,

## **2.7 Data**

The Verification Body must provide any information and data regarding the performance and management of FSA verification audits to SAI Platform (or its appointed representative) when requested to do so by SAI Platform.

# **3 Competency Requirements for Scheme Managers**

## **3.1 General**

The Verification Body must have a named Scheme Manager with overall responsibility for the quality of the FSA Verification Audits. This manager shall act as the point of contact with SAI Platform (and any organisation appointed by SAI Platform to manage the Approval Process, Quality Control Process or Training) to answer queries or to discuss issues for all activities globally.

The Scheme Manager must be an employee and not a contractor

The Scheme Manager must be fluent in English



### 3.2 Education

The Scheme Manager must have post-secondary education with a minimum course duration of 2 years in a discipline related to agriculture or food.

## 4 Competency Requirements for In-house Trainers

### 4.1 General

The Verification Body must nominate an In-House Trainer who is responsible for ensuring that the Auditor team is up to date with training and updates to the FSA. The role of the In-house Trainer is to ensure all auditors have been trained, and to cascade learning and updates from SAI Platform.

The In-House Trainer must be an employee and not a contractor

The In-House Trainer must be fluent in English

### 4.2 Education

The In-House Trainer must hold a post high school (post-secondary education) diploma with a minimum course duration of 2 years in a discipline related to agriculture or food science or equivalent.

### 4.3 Experience

The In-House Trainer must have a minimum of 2 years' experience gained after finishing post high school studies, or 4 years if their qualification is in food rather than agriculture. This must be in a practical capacity on farm/site or in a technical production management role in agriculture.

The In-House Trainer must additionally be able to demonstrate audit experience in sustainable agriculture through one of the following routes:

- at least 3 years' experience of delivering sustainable agriculture audits in crops and regions relevant to the FSA for at least one scheme recognized by SAI Platform. For a list of recognised schemes please see the current "List of Verification Audit Schemes recognised by SAI Platform in the VB Approval Process" available on the [GLOBALG.A.P. Website](#).
- experience of delivering at least 5 FSA Verification Assessments as an (Associate) Auditor (see Section 6), including at least 3 FSA Verification Assessments of Farm Management Groups. This option provides a pathway for FSA Associate Auditors without direct experience of the standards listed above to become FSA Principal Auditors through FSA experience. (see also Section 5.2 below).

The In-House Trainer must have completed Lead Auditor training covering ISO19011 principles, with minimum duration of 37 hours, provided or accredited by a recognized external body.

### 4.4 FSA Expertise

The In-House Trainer must:

- have completed SAI Platform training for In-house Trainers
- attend additional training as required by SAI Platform
- keep up to date with Clarification Notes and other FSA updates



## 5 Competency Requirements for FSA Principal Auditors

### 5.1 Education

FSA Principal Auditors must have post-secondary education with a minimum course duration of 2 years in a discipline related to agriculture or food science.

### 5.2 Experience

FSA Principal Auditors must have a minimum of 2 years' experience gained after finishing post high school studies, or 4 years if their qualification is in food rather than agriculture. This must be in a practical capacity on farm/site or in a technical production management role in agriculture.

FSA Principal Auditors must additionally be able to demonstrate audit experience in sustainable agriculture through one of the following routes:

- at least 3 years' experience of delivering sustainable agriculture audits in crops and regions relevant to the FSA and in which they will be delivering FSA audits for at least one scheme recognized by SAI Platform. For a list of recognised schemes please see the current "List of Verification Audit Schemes recognised by SAI Platform in the VB Approval Process" available on the [GLOBALG.A.P. Website](#).
- experience of delivering at least 5 FSA Verification Assessments as an (Associate) Auditor (see Section 6), including at least 3 FSA Verification Assessments of Farm Management Groups. This option provides a pathway for FSA Associate Auditors without direct experience of the standards listed above to become FSA Principal Auditors through FSA experience.

### 5.3 FSA Expertise

All FSA Principal Auditors must complete the required training prior to delivery of audits:

- participation in the FSA Verification Audit Principal Auditor Training webinar programme delivered by SAI Platform (or its Training Partner); OR
- participation in an internal FSA Verification Audit Principal Auditor Training programme developed and delivered by the audit body and approved by SAI Platform (or its Training Partner)

All FSA Principal Auditors must take part in annual refresher training

### 5.4 Approval

All FSA Principal Auditors must be registered in the FSA VB database.



## 6 Competency requirements for FSA Associate Auditors

### 6.1 Education

- FSA Associate Auditors must have post-secondary education with a minimum course duration of 2 years in a discipline related to agriculture or food science.

### 6.2 Experience

- FSA Associate Auditors must have a minimum of 2 years' experience gained after finishing post high school studies, or 4 years if their qualification is in food rather than agriculture. This must be in a practical capacity on farm/site or in a technical production management role in agriculture.
- FSA Associate Auditors must have at least 2 years of experience of delivering agriculture audits in crops and regions relevant to the market and/or crop(s) of the FMG being audited

### 6.3 FSA Expertise

FSA Associate Auditors must have completed the required training prior to delivery of audits:

- participation in the FSA Verification Audit Auditor Training webinar programme delivered by SAI Platform (or its Training Partner); OR
- participation in an internal FSA Verification Audit Auditor Training programme developed and delivered by the audit body and approved by SAI Platform (or its Training Partner)

This training must have been completed within a maximum of 12 months prior to delivering any FSA Verification Audit.

### 6.4 Approval

FSA Associate Auditors do not need to be registered in the FSA VB database.

It is the responsibility of the VB to maintain its list of FSA Associate Auditors, and to demonstrate that they meet these requirements.

It is the responsibility of the FSA Principal Auditor to ensure that the auditor(s) delivering an individual FSA Verification Audit meet these requirements.

## 7 Roles and Responsibilities of FSA Principal and Associate Auditors

### 7.1 When an FSA Associate Auditor May Be Used

All FSA Verification Audits must be delivered by an approved & registered FSA Principal Auditor (see section 5).



If the VB does not have an FSA Principal Auditor with the relevant country, market, crop or other expertise required for an individual FMG, the VB may appoint an FSA Associate Auditor to work with the FSA Principal Auditor to deliver the Audit.

The FSA Associate Auditor must meet the competency requirements outlined in Section 6.

## **7.2 Responsibilities of the FSA Principal Auditor**

The FSA Principal Auditor is responsible for:

- ensuring the FSA Associate Auditor has the required set of audit skills and experience as outlined in Section 6, including confirming that they completed the FSA training component within 12 months prior to the Audit date.
- ensuring the FSA Associate Auditor has the relevant country, industry, crop & other relevant experience for the Audit, as identified in the risk assessment
- ensuring the Audit is carried out according to the relevant FSA guidance and requirements, and the VB's own procedures for FSA Verification Audits.
- the quality of the audit report
- signing the Audit Report

## **7.3 Role of the FSA Associate Auditor**

The role of the FSA Associate Auditor is to carry out the FSA Verification Audit according to the relevant FSA guidance and requirements, and the VB's own procedures for FSA Verification Audits.

## **7.4 Records**

The FSA Principal Auditor must maintain a written record of the following in relation to each Verification Audit for which an FSA Associate Auditor has been assigned:

- the FSA Principal Auditor's engagement with the client, & understanding of the audit requirements
- the assessment of the FSA Associate Auditor as competent for the Audit, justifying why an Associate Auditor was assigned to this Audit, and detailing their competency for the role including education, experience, training, and relevant expertise
- the risk assessment & risk profile of the Audit & FMG
- note from the preparation meeting(s) with the auditor prior to the Audit, and debrief meetings to review outcomes & the audit report

It must be clear in the Audit Report that an FSA Associate Auditor was assigned, and the report must name the FSA Principal Auditor who led the engagement. Additionally, the VB shall register the Letter of Attestation (LoA) in the FSA VB database under the FSA Principal Auditor, who is responsible for it.



## 8 Probationary Period and Quality Control

### 8.1 Probationary period following approval

The first three Letters of Attestation issued by the VB following approval must be reviewed by SAI Platform before being issued to the client or entered into the register of Letters of Attestation. These LoAs must be emailed along with the full audit report to the FSA Programme Manager before issuing the LoA to the client.

The FSA Programme Manager (or their appointed representative) will review and respond with questions or requests for clarification within 10 working days. The FSA Programme Manager (or their appointed representative) may then request any amendments to be made and set a deadline within which the VB shall implement the corrective measures.

The VB must make these amendments before issuing the LoA to the client.

### 8.2 Ongoing Quality Checks

SAI Platform (or their appointed representative) may carry out random sample checks of the LoAs issued by each approved Verification Body each year. This will include review of the associated audit reports. The VB must provide SAI Platform (or their appointed representative) with these audit reports on request. VB shall provide the requested documentation within 10 working days.

If, as a result of these checks, an LoA or audit report are deemed not to meet the FSA requirements, SAI Platform (or their appointed representative) will request that the VB investigate the cause of the discrepancies and SAI Platform (or their appointed representative) will prescribe required improvements to their systems and set a deadline within which the VB shall implement the corrective measures. These findings and improvements must be demonstrated to SAI Platform (or their appointed representative).

Following this process, SAI Platform (or their appointed representative) will place the VB in a probationary period, and will not be able to issue LoAs without review and approval from SAI Platform (or their appointed representative).

If the VB continues not to meet requirements, SAI Platform may require re-training of the Scheme Manager and In-house trainer and set the VB a deadline to complete the re-training.

### 8.3 Termination of approved VB status

If a VB continues to fail the requirements following re-training, SAI Platform reserves the right to terminate their approved status.

If a VB refuses to comply with the requirements for sample checks, SAI Platform reserves the right to terminate their approved status.

In case SAI Platform decides to terminate a VB's approved status, SAI Platform will state a period, after which the VB may apply to re-join the programme. The application will be subject to the same criteria and costs as if they were applying to join the program for the first time. A precondition for this is that the VB has paid all outstanding invoices.

The LoAs issued by a terminated VB are allowed to continue their validity and expire normally after which the FMG can be issued a LoA by another VB. SAI Platform reserves the right to cancel those LoAs that were issued in a wrongly manner and not in accordance with the FSA System Rules.



## 9 Grievance Procedure for Audit Bodies

If a Verification Body wishes to make a complaint about the implementation of the procedures described in the document or any other document or procedure, or if another person or organisation wishes to make a complaint regarding the conduct or qualifications of a Verification Body or an Auditor in relation to these or any other FSA requirements or procedures, this should be communicated in writing to SAI Platform via [fsatool@saiplatform.org](mailto:fsatool@saiplatform.org)

In the first instance, the FSA Programme Manager will seek to resolve the complaint. This may include mediation between two parties to agree a resolution.

If no agreement can be reached to the satisfaction of all parties, the FSA Programme Manager will refer the question to the FSA Steering Committee, which may convene an adjudication sub-committee to resolve the question. An appeal against the decision of the FSA Steering Committee shall be finally settled in accordance with the Arbitration Rules of the German Institution of Arbitration (DIS) without recourse to the ordinary courts of law. The number of arbitrators is three (3). The place of arbitration is Frankfurt am Main, Germany and the language of the arbitration proceedings shall be English.

## 10 Relevant documents

Relevant documents be downloaded from the FSA Resource Centre [saiplatform.org/fsa/resource-centre/](https://saiplatform.org/fsa/resource-centre/) and the [GLOBALG.A.P. Website](#).

1. FSA Implementation Framework
2. FSA Third Party Verification Audit Guide for Farm Management Groups
3. FSA Third Party Verification Audit Guide for Stand-Alone Farms
4. FSA Verification Audit Control Points Evidence (excel spreadsheet)
5. List of Verification Audit Schemes recognised by SAI Platform in the VB Approval Process July 2019



## 11 Document change control

Section	Change made
<b>Amends made since version 1.0 issued 21 August 2019</b>	
1 Introduction	Update to refer to inclusion of new Principal and Associate Auditor guidance
4.3 Experience requirements for In-House Trainers	Added FSA experience pathway to maintain consistency with Principal Auditor requirements
5 Competency Requirements for FSA Principal Auditors	Revised to change FSA Auditor to FSA Principle Auditor, and to add new FSA Experience Pathway
6 Competency requirements for FSA Associate Auditors	New section added: requirements for FSA Associate Auditors
7 Roles and Responsibilities of FSA Principal and Associate Auditors	New section added to describe Principal and Associate Auditor roles & responsibilities
Sections 8, 9 & 10	Previously sections 6,7 & 8 - content unchanged but renumbered due to addition of new sections 6 and 7
<b>Amends made since version 1.1 issued 24 February 2020</b>	
2.3 Audit Management Systems	Added period and process for obtaining accreditation
2.5 Personnel and Training	Updated to refer to FSA Principal auditor. Clarified Scheme Manager and In-House Trainer requirements.
7.4 Records	Added requirement for registration of LoAs in the FSA VB database