Implementation Framework

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1 Purpose and Scope of the Implementation Framework

SAI Platform’s Farm Sustainability Assessment (FSA) is a widely used industry solution for assessing, improving, and verifying farm level performance. The Implementation Framework is a key reference for users of the FSA. It helps them understand the intent behind the FSA, provides step by step instructions for implementation at farm or farm group level, and identifies the minimum requirements for passing an FSA verification audit. A glossary of terms can be found in Annex 1.

1.1 Purpose of the Implementation Framework

The Implementation Framework identifies the minimum requirements for implementing the FSA based on the Self-Assessment Questionnaire (SAQ). This ensures that the FSA is implemented effectively, consistently, and accurately, so that any resulting performance claims are reliable.

The Implementation Framework also provides background information and practical implementation guidance to Farm Managers and Farm Management Group Coordinators.

1.2 Scope of the Implementation Framework

The Implementation Framework describes how the FSA should be implemented with a stand-alone farm or a Farm Management Group (FMG), based on the Self-Assessment Questionnaire.

While the document gives some indications on how the FSA can be implemented using benchmarked schemes, this is formally outside the scope of the Implementation Framework. Users are referred to the Benchmarking Protocol for this option.

Equally, while the document does outline how the FSA is used by downstream buyers of agricultural ingredients, this is formally outside the scope of the Implementation Framework. Users are referred to the Supply Chain User Guide for this information.
1.3 Formal status of the Implementation Framework

The Implementation Framework is a normative document for Stand-Alone Farms and Farm Management Groups (FMGs) implementing the FSA. Verification Bodies will therefore use this document as a reference during the FSA Verification Audit. The Audit Guide for Stand-Alone Farms as well as for FMGs builds on the FSA Management System requirements outlined in the Implementation Framework.

2 Understanding the Farm Sustainability Assessment

SAI Platform’s Farm Sustainability Assessment (FSA) is a toolset for farms and companies in agricultural value chains to help assess, improve and verify on-farm sustainability performance.

2.1 Purpose of the FSA

The FSA supports businesses in agricultural value chains to drive relevant and demonstrable continuous improvement of on-farm social, environmental, and business performance through supply chain collaboration and fostering a common understanding of sustainable agriculture.

2.2 Scope of the FSA

The FSA can be used for all cultivated crop farming anywhere in the world. The FSA is applicable to all types of farming systems, all sizes of farms and all levels of professional sophistication and sustainability performance.

The FSA can be applied at the level of a single farm, a group of farms, or a group of farms and their first buyer.

The FSA is available for use by members and non-members of SAI Platform. Members benefit from enhanced FSA implementation support and preferred access to certain FSA tools, such as the online FSA Web App and other services, as well as from other SAI Platform activities.
2.3 Governance of the FSA

The FSA was developed by SAI Platform to align the food and drink industry value chain approach to promoting sustainable agriculture through supply chain engagement. SAI Platform members work together pre-competitively to maintain FSA system integrity, design and review tools and support the day-to-day management of the FSA.

SAI Platform’s Executive Committee has delegated governance of the FSA to the FSA Steering Committee. The FSA Steering Committee is made up of a maximum of eight SAI Platform member companies.

The day-to-day management of the FSA is carried out by the SAI Platform secretariat. It supports the FSA Steering Committee in its work, provides user support, maintains the toolset and manages communication and stakeholder relations. Users and other stakeholders of the FSA can contact the FSA Help Desk, which is managed by SAI Platform by sending an e-mail to fsatool@saiplatform.org.

Any organization can raise a grievance about the FSA by e-mailing fsatool@saiplatform.org, with fsassteerco@saiplatform.org in copy. The SAI Platform secretariat will attempt to address the grievance with the grievant directly and transparently. In case the grievance is not solved satisfactorily, it will be escalated to the FSA Steering Committee for a final decision.

2.4 Normative documents governing the use of the FSA

Normative documents are reference documents containing requirements for FSA Implementation and Verification and making FSA Volume Claims.

2.4.1 FSA Implementation Framework

The FSA Implementation Framework includes all normative documents that underly and govern the implementation process and the representation of results:

- [ ] FSA Implementation Framework
- [ ] Self-Assessment Questionnaire
- [ ] Guide to Making FSA Statements and Claims
2.4.2 FSA Verification Framework

The FSA Verification Framework includes all normative documents that underly and govern the verification process and the representation of results:

- FSA VB and Auditor Requirements
- FSA Audit Guide for Stand-Alone Farms
- FSA Audit Guide for Farm Management Groups
- FSA Audit Control Points

2.4.3 FSA Benchmarking Framework

The FSA Benchmarking Framework includes all normative documents that underly and govern the benchmarking process, and the representation of results. It includes the following documents:

- FSA Benchmarking Protocol
- FSA Benchmarking Overview
- Guide to Making FSA Statements and Claims

2.5 Functions and Roles within FSA Implementation

Implementing the FSA typically requires various actors working together. Within the FSA, each actor has a defined role to ensure that the FSA is applied consistently and effectively. This section introduces the main roles. The minimum requirements to be fulfilled by each role will be specified in FSA Implementation Requirements Step-by-Step of the Implementation Framework.
2.5.1 Farm

The farm is the subject of the Self-Assessment Questionnaire (SAQ), which is the fundament of FSA Implementation. A farm is defined as: All land and facilities used for agricultural production activities, including non-productive areas under the management of an identified responsible person(s). A farm may be composed of several physical separate farm buildings and fields, producing the same crop(s)/product(s) in scope of the assessment.

Fig. 1: Functions and Roles within FSA Implementation

A specific definition for smallholder farms can be found in Annex 5.

In FSA terms, the farmer is the person carrying final responsibility for the farm performance and the SAQ. This may be the farmer-owner or an appointed farm manager.

It is possible for single farm-level FSA Performance Level claims to get independently verified; in which case it is referred to as a stand-alone farm verification.

2.5.2 Farm Management Group (FMG)

The FMG is a group of farms that implement the FSA together, optionally including the direct buyer of their crop(s). The FMG needs to fulfil FSA requirements to ensure that it is a coherent, engaged, and transparent group of farms (3.2.1). As such, the FMG can undergo an FSA verification audit and the verified performance level result applies to crop(s) produced by the FMG. The FMG is managed by an FMG Coordinator.
2.5.3 Farm Management Group Coordinator (FMG Coordinator)

The Farm Management Group Coordinator is the organization that legally represents the Farm Management Group. It is usually a first level aggregator or processor or a cooperative. The FMG Coordinator typically buys raw agricultural products from farms and is responsible for implementing the FSA in accordance with normative documents. The FMG Coordinator sets up and manages the FSA Management System. The individual responsible for FSA implementation within the FMG Coordinator is referred to as FMG Manager.

2.5.4 Buyer

A buyer is an organization in the supply chain buying FSA verified material from a stand-alone farm, an FMG Coordinator or another buyer. A buyer can make FSA Claims about the FSA performance level of the agricultural ingredients it purchased on a mass balance basis and in accordance with the Guide to Making FSA Statements and Claims. Buyers can find customized guidance about implementing the FSA in their supply chain in the FSA Supply Chain User Guide.

2.5.5 Verification Body (VB)

Verification Bodies are SAI Platform approved independent organizations, accredited to perform FSA verification audits and issue FSA Letters of Attestation. The Requirements for Verification Bodies and Auditors stipulate the requirements, roles and responsibilities of the VBs, Principal Auditors and Associate Auditors.

2.5.6 SAI Platform

SAI Platform is the FSA Scheme Owner and Manager. The FSA is developed, maintained, and improved by SAI Platform members through an agreed governance mechanism. It has delegated the day-to-day management of the FSA to the SAI Platform Secretariat.

2.6 FSA Modules

The FSA is a set of adaptable modules supported by tools and guidance materials. The use of these modules and tools is governed by normative documents to ensure users can demonstrate to auditors that they have used the tools correctly and confidently communicate about the results. The modules are outlined in the rest of section 2.6.
2.6.1 Self-Assessment Questionnaire (SAQ)

The FSA is built around a holistic SAQ which a farmer and/or a Farm Management Group Coordinator can use to assess the application of sustainable farm practices. The SAQ needs to be completed at farm level, and contains yes / no questions on business, environmental and social farm practices. It is available for Farm Managers in the online FSA Web App and as a downloadable Excel version free of charge and in several languages. SAI Platform members and their suppliers can access the SAQ through the FSA Web App.

2.6.2 Priority Screening Module (PSM)

The Priority Screening Module is meant for the Farm Management Group (FMG) Coordinator to perform a high-level screening of social, environmental, and business priorities for the farms in the FMG. This provides the FMG Coordinator with an opportunity to better understand the sustainability context which the farms operate in, in connection to farm characteristics and customer priorities.

2.6.3 Continuous Improvement Module (CIM)

The Continuous Improvement Module is a set of guidance materials and templates to help the FMG Coordinator develop, implement, and monitor a continuous improvement plan for the FMG. The Continuous Improvement Plan will be subject to the FSA Management System audit in case of independent verification of Farm Management Group Performance and is optional for verification at stand-alone farms.

2.6.4 Outcome Measurement Module

The Outcome Measurement Module provides an overview of tools to help measure environmental and social outcomes of farming. The module provides guidance on linking outcome measurement tools to Continuous Improvement Plans, how to select the right tool for the Farm Management Group and how to use the results in communicating outcomes.

2.6.5 Verification Module

The Verification Module allows farms or FMGs that have implemented the FSA to demonstrate their performance through independent third-party verification. Verification by SAI Platform approved Verification Bodies results in an FSA performance claim at bronze/silver/gold level.
2.6.6 Benchmarking Module

The Benchmarking Module allows agricultural sustainability schemes to be benchmarked against the FSA Self-Assessment Questionnaire and FSA normative documents. Following a defined Benchmarking Protocol, sustainability schemes can obtain a partial/bronze/silver/gold equivalence level against the FSA. The Benchmarking Overview provides businesses with transparency to make informed and consistent sustainable sourcing decisions.

2.6.7 Supply Chain Module

The Supply Chain Module guides businesses that buy agricultural ingredients, or products with such ingredients, in implementing the FSA in their business and with their suppliers. The Supply Chain User Guide informs companies how to use the FSA to achieve their sustainable farming goals.

2.7 Collateral Support Materials

SAI Platform has a range of support materials available to help implement the FSA and promote the uptake of sustainable agricultural practices through the FSA. These materials can be accessed through the FSA Resource Centre on the SAI Platform website.

2.8 FSA Web App

The FSA Web App is SAI Platform’s online tool for managing FSA related information. The FSA Web App is available free of charge to members of SAI Platform, who can invite their suppliers onto it. The FSA Web App allows farmers, FMG Coordinators, and Buyers to collect, manage, and analyze and information about FSA performance and communicate it along the supply chain. The FSA Web App gives all users a much richer FSA experience, providing insights and advice users miss out on when they only use the free off-line Self-Assessment Questionnaire in Microsoft Excel.

2.9 FSA Performance Level Claims

It is possible for Stand-Alone Farms, FMG Coordinators and buyers to make FSA Performance Level Claims relative to the (processed) crops that they produce and source. The following pre-conditions for making claims apply:
Stand-Alone Farm / FMG has been third-party verified as demonstrated through a valid FSA Letter of Attestation. This implies the Stand-Alone Farm / FMG uses a verified Volume Accounting System to track the mass balance of incoming and outgoing product flows in relation to FSA performance.

External claims can only be made based on Bronze / Silver / Gold Performance.

Buyer can demonstrate that (processed) crops have been sourced with an FSA claim through its volume accounting system. The FSA does not prescribe Chain of Custody requirements for buyers but expects them to keep a mass balance administration to support external FSA claims. This administration should use industry accepted conversion factors to account for any volume losses due to processing.

Claim cannot be made on-product, whether in writing or by using the FSA logo and name, of the SAI Platform logo and name. The FSA primarily provides business-to-business assurance about on-farm sustainability and can be used to support online public facing communication about on-farm sustainability. Users should avoid using the FSA purely for product promotion with consumers.

Claimants must follow the guidance provided in the Guide to Making FSA Statements and Claims. Any external claims must be approved by SAI Platform in writing and can be submitted for approval through fsatool@saiplatform.org

It is not possible to make a product-related FSA claim based on the use of a benchmarked scheme. Users of benchmarked schemes should use the claim possibilities provided by the scheme and may add that the scheme has bronze/silver/gold level equivalence to the FSA. Companies using the FSA for aggregate reporting on sustainable sourcing targets may do so in their Annual Report and related communication. External claims need to be pre-approved by SAI Platform in this case.
3 FSA Implementation Requirements Step-by-Step

This section informs farmers and FMG Managers how to implement the FSA based on the SAQ in a way that meets the minimum requirements that the auditor will look for during an FSA Verification Audit.

The process for implementing the FSA is outlined in a step-by-step way to make it easier to understand. In most cases, this will also be the most effective and efficient way to implement the FSA. Nevertheless, users are free to change the order of the steps outlined below according to their needs and circumstances. In some cases, it might be opportune to implement steps in parallel to each other.

Each step will be explained to guide the user and includes links to relevant tools and resources. At the end of each step, there is a summary of requirements that the auditor will look for during a verification audit. This can be used as a checklist to ensure the FSA is implemented properly.
The online [FSA Learning Centre](#) provides complementary implementation guidance, including tips & tricks and examples. Users are recommended to consult this resource for additional information.
3.1 **Step 1: Agree internally on the purpose of implementing the FSA**

The FSA is a flexible and adaptable toolset that allows Stand-Alone Farms or Farm Management Group Coordinators to achieve a variety of outcomes, depending on how it is used. Therefore, the recommended first step is to agree what the aspired outcomes are internally.

This will help inform:

- internal roles and responsibilities in the implementation start-up phase
- which farms to approach for FSA implementation
- the need to have early conversations with customers and / or partners about this
- how to sequence and structure the conversations with farmers, customers, and other partners
- your narrative for farms, customers, and partners about why and how you want to implement the FSA
- whether it makes sense to opt for using an FSA Benchmarked Scheme instead of implementing the FSA directly

FSA Implementation works best if internal management of the FMG Coordinator and Farm Managers buy into the ‘why’ and the ‘how’ of it. It is important to keep an open mind to adjust your aspirations based on the external conversations you have about them, and the learnings that come through implementing the FSA.

Ensure senior management buy-in early in the process. This will help you get access to the support and resources you may need later in the process.

Remember that there are alternative routes to demonstrating FSA Performance Levels besides implementing it directly. Consider using an alternative sustainability scheme that has FSA Benchmark Equivalence or one of the hybrid options for demonstrating performance. This allows your organization to leverage existing efforts and avoid duplication or benefit from specialized schemes that may be more appropriate to your specific business. More information on benchmarking can be found in 2.6.6.
Why are we doing this?

**Example 1 - The customer demands it.**

Our customer has introduced FSA Silver level as a new product requirement. We have 12 months to fulfil it.

**Example 2 - We want to showcase our existing sustainability programme.**

We have a successful sustainability programme with our 200 growers, and we’d like to gain external international recognition for it. The FSA will allow us to demonstrate our performance independently and support our story-telling efforts to customers and stakeholders.

**Example 3 - Brand differentiation**

Our brand differentiates itself as very sustainable, so our contracted farmers should be at FSA Gold Level.

**Example 4 - Starting a coordinated improvement programme.**

Our supplying growers are facing common issues and we want to help them with a coordinated programme to help them overcome their challenges. The FSA provides us with the structure and process we need, and to include all our growers.

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3.2 **Step 2: Set up the FSA Management System**

Having an adequate FSA Management System in place is a key requirement for FSA Implementation, and is key verification requirement. This is to ensure the FSA is implemented in accordance with the Implementation Framework as well as to enable the FMG Coordinator or Stand-Alone Farm to take accountability for the results.

The FSA Management System should consist of the following components:

- Farm Management Group
- Accountability and Administration
- Volume Accounting System
- Continuous Improvement Plan and Report
Your company might already have some components in place as part of your everyday business. For example, you may have a Volume Accounting System. These components may just need minor adjustments for them to meet the requirements of the FSA Management System. In that case, there is no need to set up these components for the FSA separately.

One FSA Management System can be used by multiple FMGs, allowing for consistency and efficiency in FMG Management.

In case of FSA Verification, the auditor will verify if the FSA Management System meets the minimum requirements outlined in this section every three years.

3.2.1 Setting up the Farm Management Group

This step does not apply if the FSA is implemented at a Stand-Alone Farm.

The Farm Management Group (FMG) is a group of farms implementing the FSA in a joint fashion. This is the most efficient way to organize farmer engagement, achieve farm improvements, and perform FSA performance level assessments. By being part of a group, farmers can share expertise and experience, and support each other in making improvements. It is recommended that farms in a group are already naturally grouped, because this facilitates a smoother implementation of the FSA. For example, farms are:

- supplying to the same first level buyer
- part of the same legal entity, e.g. a cooperative
- members of the same organization, e.g. a farm union or organization
- participating in the same performance improvement programme
We recommend forming groups along natural factors like the following

- Farms supplying to the same 1st level buyer
- Farms which are part of the same legal entity
- Members of the same organization, e.g. a farm union
- Farms participating in the same performance improvement programme

**Fig 3: Natural farm group setups**

It is optional to include the first level buyer from the farms in the FMG. Most FMGs do this, as the first level buyer is typically the FMG Coordinator responsible for implementing the FSA with the FMG (3.2.2).

The benefits of including the first-level buyer in the FMG are that it:

- can use the existing relationships with farmers as the administrative basis for the FMG
- will own the FSA Letter of Attestation, which is the basis for making volume claims in the market
- can control the Volume Accounting System, as it is typically the entity selling (processed) agricultural products into the supply chain
The FMG must fulfill the following requirements during an FSA Management audit:

- All farms must be in the same country.

- SAI Platform reserves the right to grant an exception to this rule in circumstances where ALL the following conditions are met:
  - The proportion of farms in at least one of the countries is more than 95% OR the number in the Farm Management Group is 6 or fewer (meaning all farms are sampled for self-assessment).
  - The farms are clearly part of the same Information and Accounting System
  - The farms are subject to one and the same sustainability programme/approach (Continuous Improvement Programme).

- FMGs wishing to use this exception must gain written approval from SAI Platform.
All farms must deliver the same crop or crops. Multi-crop FMGs are allowed without additional SAI Platform permission:

- The scope of the farm assessment should be determined based on the crops for which the FMG wishes to make a claim. This will also affect the sampling regime.
- If the FMG wishes to make one claim covering all crops, then the farms can be treated as one FMG, which is sampled using farm-level assessments. If there are differences between management practices between crops, the overall farm score is the lowest score (i.e. if the answer for any one crop is ‘no’ the answer for the farm is ‘no’). The result of the FSA self-assessment sample is the Performance Level Claim for all crops for the whole group.

All farms have an agreement with the FMG Coordinator meeting the minimum administrative requirements outlined in 3.2.2.

All farms are within scope of the implementation of the FMG’s Continuous Improvement Plan (3.5).

All farms are administered in the Volume Accounting System.

The maximum number of farms in the FMG is 5,000. SAI Platform may grant permission for exceptions to this requirement. FMGs exceeding the maximum size will be required to prove that there are sufficient thresholds to ensure sufficient homogeneity in the group as well as sufficient farm engagement with all farms in the Farm Management Group.

### 3.2.2 Farm Management Group Coordinator

The FMG Coordinator is the legal entity responsible for implementing the FSA in accordance with the Implementation Framework. This means it is responsible for identifying and engaging the individual farms within the FMG.

The FMG Coordinator is free to use its existing administration in support of meeting these requirements and encouraged to integrate the FSA into its operations for maximum efficiency and continuity.

During an FSA Management System Audit, the FMG Coordinator must be able to show the auditor that it fulfilled its responsibility. Therefore, the FMG Coordinator needs to demonstrate conformance with the requirements below.
The FMG Coordinator’s top management must document its commitment to implement and maintain the FSA Management System in accordance with the FSA Implementation Framework.

The day-to-day implementation of the FSA is managed by an FMG Manager, who is a competent person with a contractual relationship with the FMG Coordinator.

The FMG Coordinator must regularly evaluate the implementation of procedures and conformance with the FSA Management System requirements, at least once per year. The findings must be reviewed by the FMG Coordinator’s top management.

The FMG Coordinator must have written procedures and definitions for managing the FSA Management System.

The FMG Coordinator must maintain sufficient records for the FSA Management System Audit. This includes at least the following information per FMG:

- List of farms included in the FMG including contact details per farm.
- Completed Self-Assessment Questionnaires by sampled farms in the FMG.
- FSA Audit Reports and FSA Letters of Attestation per FMG.
- The FMG Coordinator must demonstrate that its Volume Accounting System meets the requirements and record volume accounts at least annually (0).
- The FMG Coordinator must demonstrate that its Continuous Improvement Plan meets the requirements and record progress against plan at least annually (Error! Reference source not found.).
3.2.3 Volume Accounting System

The purpose of the Volume Accounting System is to support the generation of accurate and reliable verified FSA claims, and to ensure there is no double counting of FSA verified volume.

**Mass Balance Accounting**

The FSA requires a mass balance accounting system as a minimum. This is a system in which FSA-verified and non-verified material is mixed physically but kept separate via an administrative trail to ensure there is no overselling of FSA verified volumes. FMGs may choose to physically segregate verified from non-verified volumes, but this is not a requirement for the FSA Management System Audit.

**Quantity Credit Method**

The FSA requires the use of the quantity credit method for mass balance accounting. A ‘credit’ is a unit of material at a specific verified FSA performance level (i.e. bronze, silver, or gold). The FMG Coordinator must set up and maintain a credit account for each crop at each FSA performance level used as an output declaration. The credit output (volume of material sold at that performance level) must be deducted from the credit account for that material/performance level, up to the limit in, but not exceeding, the credit account (taking into account conversion factors). The credit account balance cannot be negative.

For the same crop, credits can be reassigned from a higher performance level to a lower one if there are sufficient credits within the higher performance level. This cannot be reversed later.
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</tr>
<tr>
<td>E Bronze</td>
<td>52.5</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>CLOSING</td>
<td>235</td>
<td>0</td>
<td>27.5</td>
<td>0</td>
</tr>
</tbody>
</table>

---

*Fig. 5 Quantity credit method for mass balance accounting*
3.2.4 Accounting Period

The inventory balancing period for FSA mass balance accounting is 12 months. The starting and closing dates of each inventory period must be clearly defined in the Volume Accounting System. The FMG Coordinator must calculate the balance of accounts at the end of each inventory balancing period and file resulting records internally.

**Carry-over credits**

FMG Coordinators and Stand-Alone Farms can carry over credits into the next inventory balancing period or use them in the period following the last inventory balancing period covered by the FSA Letter of Attestation. In both cases, the maximum validity of these carry-over credits is twenty-four months. After this period, the validity of the credits will expire, and they must be removed from the credit account.

![Fig. 6: Carry-over credits](image)

**Conversion factors**

Conversion factors are required where internal processes mean that input material is lost or converted so that the volume of output material is lower. The FMG Coordinator must determine if conversion factors are required and must determine the conversion factors to be used. The conversion factor(s) must be defined and justified in the system procedures. The same method must be used throughout the three-year duration of the Letter of Attestation. The conversion factor itself may vary, but the method used to calculate it must remain the same. The amount of material sold within one inventory period must not be larger than the product of the amount of material going into the process multiplied by the conversion factor.
Summary of the Volume Accounting System requirements

Since the Volume Accounting System is a key focus of the FSA Management System Audit, it is important to meet the following requirements:

☐ There is a mass-balance Volume Accounting System based on the Quantity Credit Method in place at the level of the FSA Management System

☐ There are written definitions and procedures for managing the Volume Accounting System, specifying:

☐ Roles and responsibilities within the FMG Coordinator for managing the Volume Accounting System
☐ How the Quantity Credit method is applied in the FSA Management System
☐ How complete and up to date records are maintained to demonstrate that the accounting system meets FSA requirements, for example:
  ☐ Purchase records such as POs, invoices, delivery notes
  ☐ Sales orders, invoices, delivery records
  ☐ Stock records
☐ How annual reporting and review of the Volume Accounting System are done
☐ Conversion factors used and the justification for doing so
☐ The start and end date of the inventory balancing period for each Farm Management Group
☐ Complete and up to date records to demonstrate the Volume Accounting system is operated in accordance with internal procedures
3.3 **Step 3: Priority Screening Module**

This module is built around the Priority Screening Tool (PST) and the summary report this tool generates. The PST is available as an online application.

Once there is clarity on the composition of the Farm Management Group, the FMG Coordinator must fill out the PST. The PST can also be used by a Stand-Alone Farm voluntarily, although not all sections are equally relevant. The PST summary report serves three basis purposes.

### Understanding the sustainability context of the FMG

The PST will generate a summary report that will rank FSA sustainability topic areas by order of priority, based on the data input. This is useful to:

- Understand high-level sustainability priorities resulting from farming conditions and farm group characteristics, as input for the Continuous Improvement Plan. (► section 3.5).
- Identify sustainability topics that farms in the FMG may lack awareness of. This may be useful information when supporting farmers to fill out the FSA Self-Assessment Questionnaire (SAQ), as providing extra support may result in more accurate self-assessment results. This reduces the amount of time spent on FSA implementation and increases the likelihood of efficient and successful FSA verification.

### Identifying potential mistakes in the set-up of the Farm Management Group

The summary report will flag potential issues related to the FMG set-up, based on the data input. If this happens, the FMG Coordinator is advised to contact a Verification Body or any other advisor to check if any adjustments to the FMG set-up must be made. This will help ensure that the FSA is implemented by an FMG that can pass the FSA Management System Audit.

### Informing the Verification Body about the farm base and farming context

The summary report will be a useful resource to help the auditors understand the farm (base) and farming context quicker and better. Sharing the report will save both the Farm Group Coordinator / Farm manager and the Auditor time.

**During the Farm Management Audit, the auditor will further check if the following documentation is available:**
3.4 Step 4: Deploy FSA Self-Assessment Questionnaire

The basic design and function of the FSA Self-Assessment Questionnaire (SAQ) is explained in 2.4.1.

Implementing the FSA at a stand-alone farm simply requires the farmer to complete the SAQ, either using the online FSA Web App or the freely downloadable excel version. Since the questions are formulated generically, farmers might find it useful to consult the question level requirements and guidance included in the SAQ. In addition, they can consult the freely available FSA Topic Guides to help them interpret the questions in their farming context. The Topic Guides provide more detail on the meaning of the question, what good looks like and references to relevant additional resources.

When implementing the FSA with a Farm Management Group (FMG), the FMG Coordinator needs to take an Internal Self-Assessment Sample of farms from the group according to the sampling regime in Table 1. This must be a random sample to ensure there is no bias in the sample. The FMG Coordinator may also ask a Verification Body or another service provider to take the sample on its behalf. This makes sampling easier for the FMG Coordinator and ensures it is being done correctly.
The FSA Self-Assessment Questionnaire contains adjusted requirements for smallholder farms, to ensure the FSA can also be implemented under smallholder conditions. Smallholder farms are defined in Annex 5. The SAQ contains a column that indicate which questions can be evidenced with an adjusted burden of proof in the case of smallholder farms.

<table>
<thead>
<tr>
<th>Number of farms in FMG</th>
<th>Self-assessment sample size</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 – 10</td>
<td>6</td>
</tr>
<tr>
<td>11 – 20</td>
<td>10</td>
</tr>
<tr>
<td>21 – 30</td>
<td>13</td>
</tr>
<tr>
<td>31 – 50</td>
<td>18</td>
</tr>
<tr>
<td>51 – 100</td>
<td>24</td>
</tr>
<tr>
<td>101 – 200</td>
<td>30</td>
</tr>
<tr>
<td>201 – 500</td>
<td>36</td>
</tr>
<tr>
<td>501 - 5000</td>
<td>40</td>
</tr>
</tbody>
</table>

*Table 1: Sampling regime for self-assessment*

In case the FMG Coordinator is already highly aware of farm performance in the FMG on the outset, for example because there is already a well-established support programme in place, it may decide to forego the Internal Self-Assessment Sample and go straight to verification. If this is the case, the Verification Body will need to define the Audit Self-Assessment Sample as part of the audit procedures, following the same sampling regime.

The FMG Coordinator will then ask the farmers of the sampled farms to complete the SAQ, providing them with sufficient support and guidance. The FMG Coordinator might use the FSA Web App for collecting the information from farmers. The FSA Web App is available to SAI Platform members, which can invite their suppliers to use it. Farmers can then complete the SAQ online, and the FMG Coordinator can monitor the progress of the FMG and use aggregator and analytical functions to easily understand FMG performance. Alternatively, the FMG Coordinator might send out the freely downloadable excel version of the SAQ and use its own in-house system to monitor progress, as well as to aggregate and analyse FMG performance. Both versions of the SAQ are available in multiple languages.
Self-Assessment questions are classified as:

- Essential
- Intermediate
- Advanced

Farmers can mark selected questions ‘Not Applicable’ if a practice does not apply to their farm. The online SAQ allows them to do this using topical filters. For example, questions about irrigation practices do not apply for farms without irrigation. ‘Not Applicable’ questions will count towards the FSA Performance Score as ‘YES’.

**TIP**

FMG Coordinators should make sure farmers of sampled farms know why they are receiving this questionnaire and provide them with the right level of support and guidance to easily complete it accurately. For example, consider the following:

- Should the farmers complete all questions, or only a selection of them? If your aspiration is to achieve Bronze Level Performance, it may not be necessary to send them the Advanced Questions.
- Would it help to redefine the questions so that farmers better understand how they apply to their operations? Or would it help to add location specific question level guidance, so they better understand when to answer ‘YES’?
- Do you have any information about the farms that will help prepopulate answers, to avoid asking farmers for information that you already have?
- Is this an opportunity for farm advisors to sit down with farmers to complete the questionnaire together, allowing for an informed conversation about on-farm sustainability to arise between the farm advisor and the farmer?

The completed SAQ will indicate the performance level of a farm. This can be Bronze, Silver or Gold. The FSA Performance Score depends on the proportion of questions answered with ‘YES’. Figure 7 explains how the scoring works on a farm level.
The FSA performance level of a FMG is determined based on the performance of the Self-Assessment Sample. It is possible for farms in the self-assessment sample to attain different Performance Levels, e.g. some farms are at Bronze level and others are at Silver Level.

The Internal SAQ results will enable the Farm Manager and the FMG Coordinator to assess which topics or practices can or must be addressed to achieve the desired Performance Level. This should then be done on an FMG level to ensure that the improvements are made across the entire group of farms, where needed.

The SAQ is also the critical tool during FSA Verification Audits. The auditor will take a new Audit Self-Assessment Sample of the FMG. Sampled farms will then have to complete the SAQ, which is the basis of an on-farm verification audit and the FMG Performance Level Claim. The precise auditing procedures can be found in FSA Verification Audit.
3.5 Step 5: Develop Continuous Improvement Plan

This module provides guidance for Farm Sustainability Assessment (FSA) users on how to develop a Continuous Improvement Plan (CIP). The guidance has been created with a focus on the process for Farm Management Groups (FMGs) which need to have a CIP as part of their FSA Management System. The approach can be adapted for Stand-Alone Farms, although the CIP is a voluntary requirement for them. It is generally not required by the FSA to have CIPs at farm level.

The process for developing a CIP is designed to be flexible rather than rigid and overly prescriptive. This flexible design allows for multiple pathways for addressing continuous improvement priorities and targets identified as part of the process. Optimising farmer engagement and outreach are key in developing and implementing a Continuous Improvement Plan successfully.

FMG Managers can find detailed instruction in Guidance and Templates for developing a Continuous Improvement Plan. This includes a template for annual reporting against the CIP, which is an internal management requirement for FMG Coordinators.

During the Farm Management Audit, the auditor will further check if the following documentation is available:

- Continuous Improvement Plan containing at least the following information:
  - Priority Area identified and justified for the FMG to improve upon
  - At least time-bound target for the FMG to work towards
  - Evidence that farmers from the FMG have been included in developing the Continuous Improvement Plan
  - Clearly assigned management responsibilities for implementing the plan
3.6 Step 6: Start Outcome Measurement

SAI Platform encourages FMGs to use outcome measurement tools to monitor and support progress where on those topics where there are CIPs in place.

For support choosing an Outcome Measurement tool we are developing an [Outcome Measurement Tools Handbook] which explains the benefits of outcome measurement and helps FMGs decide which tool is most appropriate for their needs. The Handbook describes the main features to look out for when selecting a tool, as well as reviews and recommends some of the more commonly used tools for each sustainability issue from an FSA perspective.

Version 1 of the Handbook will focus on farm GHG calculators and gradually review more tools over time.
4 FSA Verification Audit

This section provides the FMG Coordinator and / or Stand-Alone Farm Manager with a high-level overview of the Verification Audit process and some tips and tricks on how to best prepare for it. More detailed information can be found in the Audit Guides for FMGs and Stand-Alone farms, which define the audit process requirements for auditors.

4.1 Purpose of the FSA Verification Audit

The purpose of the FSA Verification Audit is to validate that the FSA has been implemented correctly, and hence that the result of the FSA Self-Assessment is accurate and applicable to the Stand-Alone Farm or the entire Farm Management Group (FMG).

A successful FSA Verification Audit results in a Letter of Attestation confirming the performance of the Stand-Alone Farm or FMG. A valid Letter of Attestation is required for making FSA Volume Claims.

![Audit process diagram](image)

*Fig. 9: Audit process*
4.2 Select a Verification Body

Only approved Verification Bodies can perform FSA Verification Audits. This ensures all Verification Bodies fulfil minimal organizational and competency requirements for conducting FSA audits ensuring quality and consistency of results.

A list of approved Verification Bodies can be found in the FSA VB Register. Clicking on the Verification Body will show you the geographies in which the company can perform Verification Audits as well as contact details of relevant offices.

SAI Platform recommends asking various Verification Bodies for a quote to select the company that best fits the needs of the Stand-Alone Farm or FMG.

Verification Bodies are required to charge a VB License Fee of €500 to their customers for each Letter of Attestation registered in the FSA Database. SAI Platform uses these revenues for the maintenance and approval of its verification programme.

4.3 Do an FSA Pre-audit

It is recommended for FMGs to perform a pre-audit before the actual audit. This will reveal how well prepared the FMG is for the Verification Audit and where additional effort may be needed. It is also an opportunity to sensitize and prepare FMG Coordinator Staff and farmers for the audit experience. Doing a pre-audit will help prepare for the real Verification Audit and ensure a more seamless audit process.

FMG Coordinators may use their internal auditors for the pre-audit or hire advisors or auditors to do it on their behalf. Internal auditors can choose to prepare for the audit through the FSA Online Auditor Course.

If the Stand-Alone Farm or FMG needs to attain an agreed Performance Level, e.g. because a customer has asked for it, it recommended to ensure that farms meet that Performance Level with a wide margin. This is to prevent that any downward deviations lead to a negative Performance Level change. For example, when the FMG wishes to demonstrate FSA Silver Level Performance, it is advised for the well over the required minimum 75% of intermediate questions to be answered with ‘YES’.
4.4 FSA Verification Audit

FMGs and Stand-Alone Farms can have the results of their FSA Self-Assessment independently verified by an approved Verification Body. Auditors will follow audit guidance and requirements by SAI Platform, as described in the Audit Guide for Stand-Alone Farms and the Audit Guide for Farm Management Groups. The auditor will verify if requirements for the FSA Management System are met and if the self-assessments accurately reflect on-farm sustainability practices. Verification requirements can be found in FSA Implementation Requirements Step-by-Step.

4.4.1 Preparing for a Verification Audit

Once a Verification Body (VB) has been selected, it is time to prepare for the Verification Audit. In most cases this will be the final step in implementing the FSA.

Starting conversation

The VB and its client will have a starting conversation in which they discuss:

- Scope and desired outcomes
- Timing and resourcing
- Guidance about audit requirements and audit process
- Any other relevant topics

The agreements are reflected in a clear contract covering the audit activities, fees, and terms.

Pre-audit Check

The VB will perform some pre-audit checks to ensure the client meets the basic FSA requirements before commencing the audit process. The VB will inform the client of the results, allowing time to respond to any requirement gaps.

In most cases it is the FMG Coordinator or the Stand-Alone Farm that contracts the Verification Body. However, it is allowed for other entities to do so. In this case, the Letter of Attestation will still be owned by the FMG Coordinator or the Stand-Alone Farm. For the purposes of this document, we refer to the client as the FMG Coordinator or the Stand-Alone Farm.
Risk Assessment
The VB is required to complete a risk assessment prior to the Verification Audit to inform the amount and type of evidence required at farm-level during the audit. The VB will share the outcome of the risk assessment with the client.

Audit Plan
The VB will agree a detailed audit plan with the client. The client will ensure that the audit can be carried out according to plan. It is the responsibility of the client to provide the auditor with access to the people, documentation and sites needed to perform the audit.

The audit of the FSA Management System can take place any time of year. It is recommended that the on-farm audits are performed during the growing season of the crop(s) covered by the audit.

4.4.2 FSA Management System Audit
A Verification Audit starts with an audit of the FSA Management System.

Purpose and scope
The auditor will verify that the FSA Management System meets the requirements set out in 3.2 The FSA Management System Audit consists of four components:

<table>
<thead>
<tr>
<th>Icon</th>
<th>Component</th>
</tr>
</thead>
<tbody>
<tr>
<td>![Icon]</td>
<td>Confirm FMG Set-up meets FSA requirements</td>
</tr>
<tr>
<td>![Icon]</td>
<td>Confirm there is management accountability and oversight of the FSA Management System</td>
</tr>
<tr>
<td>![Icon]</td>
<td>Confirm the volume accounting system is accurate, reliable and meets FSA requirements</td>
</tr>
<tr>
<td>![Icon]</td>
<td>Confirm the continuous improvement programme meets minimum FSA requirements</td>
</tr>
</tbody>
</table>

*Fig. 10: Components of the FSA management system audit*
The FSA Management System Audit should only include those systems that are used to govern, manage, implement, and monitor the implementation of the FSA.

**Audit activities and duration**

The auditor will perform a mix of activities to gather evidence that the requirements for an FSA Management System have been met, including management interviews, document and records review, sample testing and data checks.

It is expected the FSA Management System audit will take 1 to 2 days. The actual time required will depend on:

- the size and complexity of the Volume Accounting System
- the nature of the evidence (database, paper files, excel)
- the availability of evidence required
- the preparedness of the Farm Management Group Coordinator

**Audit report and statement**

The auditor will complete an FSA Management System Audit Report within two weeks of completing the audit and share this with the client.

- If the audit report confirms that the FSA Management System meets FSA requirements, the VB should confirm this with an audit statement. This statement is valid for three years from the date of the audit
- If the audit report identifies gaps in the FSA Management System, the Verification Audit must be halted until the client makes the necessary corrections, and this has been confirmed by the VB

**4.4.3 On-Farm Verification Audits**

Once the FSA Management audit has been completed, the auditor can proceed to the on-farm audits.
Completing the Audit Self-Assessment Sample

In case of implementing the FSA with an FMG, the auditor will randomly select a sample of farms to complete the FSA Self-Assessment Questionnaire (Step 4: Deploy FSA Self-Assessment Questionnaire). This is called the Audit Self-Assessment Sample.

The sample size depends on the size of the FMG and follows the sampling regime in Table 2. This sample needs to be taken within 3 months of the first on-farm audit.

<table>
<thead>
<tr>
<th>Number of farms in FMG</th>
<th>Self-assessment sample size</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 – 10</td>
<td>6</td>
</tr>
<tr>
<td>11 – 20</td>
<td>10</td>
</tr>
<tr>
<td>21 – 30</td>
<td>13</td>
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<tr>
<td>31 – 50</td>
<td>18</td>
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<tr>
<td>51 – 100</td>
<td>24</td>
</tr>
<tr>
<td>101 – 200</td>
<td>30</td>
</tr>
<tr>
<td>201 – 500</td>
<td>36</td>
</tr>
<tr>
<td>501 – 5000</td>
<td>40</td>
</tr>
</tbody>
</table>

Table 2: Sampling regime for Audit Self-Assessment

All completed Audit Self-Assessments should be sent to the auditor prior to the audit. This will allow the auditor to review if they are complete and if question that were answer ‘Not Applicable’ (N/A) were excluded correctly. The auditor will also review the Performance Level Score for each farm.
Next, the auditor will randomly take a second sample from the Audit Self-Assessment Sample to select the farms that will be subject to an on-farm audit. This will be within 2 weeks of the first on farm audit and will follow the regime in Table 3.

<table>
<thead>
<tr>
<th>Number of Audit Self-Assessments</th>
<th>On-farm audit sample size</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>4</td>
</tr>
<tr>
<td>10</td>
<td>4</td>
</tr>
<tr>
<td>13</td>
<td>7</td>
</tr>
<tr>
<td>18</td>
<td>7</td>
</tr>
<tr>
<td>24</td>
<td>9</td>
</tr>
<tr>
<td>30</td>
<td>9</td>
</tr>
<tr>
<td>36</td>
<td>9</td>
</tr>
<tr>
<td>40</td>
<td>9</td>
</tr>
</tbody>
</table>

*Table 3: Sampling regime for on-farm audits*

**Detailed Audit Plan**

The auditor and the client need to agree on a detailed audit plan for the on-farm audits with the aim of ensuring an efficient audit.

Any question can be evidenced at FMG level if the topic is actively managed at group or landscape level, or if policies and records are held by the FMG Coordinator on behalf of the farms in the group.

Where relevant activities or policies are managed by third parties, evidence must be provided that the policies or activities of this provider reflect the FSA requirements.

The typical on-farm audit plan is outlined in figure 12.
<table>
<thead>
<tr>
<th>Event</th>
<th>Timeframe</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Within 3 months before the first on-farm audit</td>
<td></td>
<td>VB Selects Audit Self-Assessment Sample</td>
</tr>
<tr>
<td>Within 2 weeks before the first on-farm audit</td>
<td></td>
<td>Auditor receives and reviews all Audit Self-Assessments</td>
</tr>
<tr>
<td>Within 6 weeks of first on-farm audit</td>
<td></td>
<td>Auditor Selects farms for on-farm audit</td>
</tr>
<tr>
<td>Within 2 weeks of final on-farm audit</td>
<td></td>
<td>Auditor conducts on-farm audits</td>
</tr>
<tr>
<td>Within 6 weeks of final audit review meeting</td>
<td></td>
<td>Auditor provides Audit Report</td>
</tr>
<tr>
<td>Within 4 weeks of Verification Closing Meeting</td>
<td></td>
<td>Audit Review Meeting</td>
</tr>
<tr>
<td>Within 3 months before the first on-farm audit</td>
<td></td>
<td>No deviations found</td>
</tr>
<tr>
<td>Within 6 weeks of final audit review meeting</td>
<td></td>
<td>Deviations accepted by client</td>
</tr>
<tr>
<td>Within 4 weeks of Verification Closing Meeting</td>
<td></td>
<td>Client provides evidence deviations do not change performance levels</td>
</tr>
<tr>
<td>Within 3 months of Verification Closing Meeting</td>
<td></td>
<td>Verification Closing Meeting</td>
</tr>
<tr>
<td>Within 4 weeks of Verification Closing Meeting</td>
<td></td>
<td>VB issues Letter of Attestation</td>
</tr>
<tr>
<td>Within 3 months of Verification Closing Meeting</td>
<td></td>
<td>Escalation process if VB and client disagree</td>
</tr>
<tr>
<td>Within 6 weeks of final audit review meeting</td>
<td></td>
<td>Letter of Attestation registered in FSA Database</td>
</tr>
</tbody>
</table>

*Fig. 12: On-farm audit plan*
In general half a day to a day should be sufficient to conduct each on-farm verification audit. The time require for doing such audit will depend on factors including:

- Sample size
- Size and complexity of farms
- Distance between farms
- Level of documentation of farm practices
- Number of farm workers to be interviewed

The on-farm audit will be performed in the spirit of promoting continuous improvement. Since this is not a compliance audit, the auditor may engage in conversations with the farmer for the purposes of knowledge exchange.

**Timing**

On-farm audits must commence within 2 weeks of the selection of the on-farm sample, and within 3 months of the selection of the Audit Self-assessment sample.

The auditor has 6 weeks to complete the on-farm audit process from the start of the first on-farm audit. SAI Platform may provide exemption to this rule upon request.

**Scope of labour questions**

The auditor will ask for evidence relating to labour practices at an early stage.

The auditor should carry out interviews with a sample of those people working on the farm. The purpose of the interviews is to confirm awareness of policies, procedures, and programmes, and to corroborate other sources of evidence for aspects such as labour practices, safety, and training.

All questions cover permanent, temporary and seasonal workers hired directly and through subcontractors. Where employment is managed through third parties, the guidance for auditing third party providers applies.
The number of worker interviews depends on the total number of workers and is displayed in Table 4.

<table>
<thead>
<tr>
<th>Total number of workers</th>
<th>Recommended number of workers in interview sample</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>3-7</td>
<td>3</td>
</tr>
<tr>
<td>8-48</td>
<td>4</td>
</tr>
<tr>
<td>49-54</td>
<td>5</td>
</tr>
<tr>
<td>55-64</td>
<td>6</td>
</tr>
<tr>
<td>Increases of 10</td>
<td>Increase by 1, up to a maximum total of 25 interviews.</td>
</tr>
</tbody>
</table>

*Table 4: Recommended number of worker interviews*

**Auditing smallholder farms**

Smallholder farms have been defined in Annex 5. Smallholder farms can always give verbal descriptions instead of written plans and policies. In FMGs with large numbers of smallholder farms, the FMG Coordinator can hold significant amount of the evidence. The auditor will refer to the smallholder farm requirements in the Self-Assessment Questionnaire for specific guidance.

**4.4.4 Audit Review and Follow up**

Once all on-farm audits have been conducted the auditor will shift focus to the FMCG Coordinator again in case of implementation by a Farm Management Group. Otherwise, the auditor will complete the audit process with the Stand-Alone Farm Manager.

**Audit Report**

The auditor must finalise an Audit Report within two weeks of the final on-farm audit. This must be sent to the client. The Audit Report will follow a required format. The VB is not required to share the Audit Report with SAI Platform, unless requested to do so for purposes of the FSA Verification Integrity Programme.
The Audit Report will clearly state the Performance Level Claim that has been verified. If this claim has not been verified, it should state the reasons for this and provide an overview of deviations found by the auditor. A deviation is any difference in score between the Audit Self-Assessment and the on-farm audit, i.e. a change from 'YES' to 'NO' or from 'NO' to 'YES'.

Audit Review Meeting
The auditor must hold an Audit Review Meeting with the client within 2 weeks of the final on-farm audit.

The purpose of this meeting is to
- review the findings in the Audit Report
- discuss areas of good practice and opportunities for improvement identified by the auditor
- review any deviations from the self-assessments identified
- give the FMG Coordinator the opportunity to respond and provide additional evidence, if required
- agree next steps

Corrective actions
FMGs and Stand-alone farms are encouraged to close gaps that have been identified during the audit. However, corrective actions are not allowed to change the audit findings. This is because it is unlikely for corrective actions to be made to all farms during the audit process, ensuring Performance Level changes are reflected across the entire FMG. FMG Coordinators are encouraged to carry out internal FSA assessments and other checks to ensure that farmers are meeting their target FSA performance level in case deviations have been identified.

Dealing with Deviations
A deviation is any change in a farm’s answer in the FSA self-assessment that results from an FSA verification audit:
- A downward deviation is a change in answer from yes (or n/a) to no.
- An upward deviation is a change in answer from no (or n/a) to yes.
If deviations are identified during the audit process, the client must decide whether to investigate further and provide evidence to show that the deviation does (or does not) occur at the farms in the Audit Self-Assessment group that were not audited. If the client decides not to investigate a downward deviation, it accepts that the deviation applies to all farms in the Audit Self-Assessment Sample. This may result in a Performance Level Change for one or more farms in the FMG.

If the client decides to investigate the deviations, it is the responsibility of the client to provide sufficient evidence to show that any downward deviation(s) identified during audit do not occur at other farms in the Audit Self-Assessment group, and lead to a negative change in Performance Level.

If the FMGC wishes to make a positive performance level change at other farms in the Audit Self-Assessment group, it must provide sufficient evidence to show that an upward deviation(s) identified during audit occurs at other farms and leads to a positive change in performance level.

If multiple deviations have been found, the FMG Coordinator must decide which deviations they choose to investigate and which they choose to accept.

There is no requirement to provide evidence for farms where there would be no performance level change.

**Escalation process in case of disagreement**

If the VB and the client are unable to agree on the outcome of an audit, this must be escalated to SAI Platform for adjudication via fsatool@saiplatform.org.

In the first instance, the Systems Director (or an appointed representative) will seek to mediate between the two parties to agree a resolution.

If no agreement can be reached, the Systems Director will refer the question to the FSA Steering Committee, who may convene an adjudication sub-committee to resolve the question. The judgement of the Steering Committee will be final.

SAI Platform will seek to resolve all issues within one month of receipt of the initial escalation notification email.
4.5 **Receive the Letter of Attestation**

Once the VB has confirmed the FMG Performance Level Claim, the audit process will be signed off and the Letter of Attestation will be issued.

The Letter of Attestation must be issued within 4 weeks of the completion of the Verification Audit. This is either the date of the Audit Review Meeting, or the date of the Follow up Verification Closing Meeting, whichever is later.

The VB must register the Letter of Attestation in the FSA Verification Database within 12 weeks of completion of the Verification Audit. The client will receive an email confirming the registration of the Letter of Attestation in the FSA Database.

Each Letter of Attestation will have a unique code. Anyone using this code can download the Letter of Attestation from the FSA Database, which is hosted by GLOBALG.A.P. as long as it is valid.

Letters of Attestation will not be made public or shared with third parties by SAI Platform. FMG Performance Level Claims, and the outcomes of Verification Audits, will not be made public by SAI Platform, unless agreed with the FMG Coordinator or Stand-Alone Farm that holds the Letter of Attestation.

4.6 **Annual Reporting Requirements**

The FMG Coordinator must provide the VB with an annual report including the list of all the farms in the FMG for that year, confirming that any changes in FMG composition do not exceed the 10% mark.

The VB must review this list, and if changes exceed the 10% mark, inform the FMG Coordinator that the Letter of Attestation will be invalidated within 6 months unless there is a re-audit of the FMG.

4.7 **Make FSA Volume Claims**

Once the client has received the Letter of Attestation, it can commence to make FSA Volume Claims. These claims relate to the performance of the farms producing the material that the client sells to a Buyer.

The FSA is primarily a business-to-business toolset. It is not allowed to make consumer facing claims with the purpose of advertising a product. Hence, the use of the names or logos of SAI Platform or the FSA cannot be used on-pack or in product advertising.
Verified Farm Management Groups and Stand-Alone Farms are welcome to communicate about their achievement in accordance with the Guide to making FSA Statements and Claims.
Index 1: Glossary

**Audit Report**  Report containing the findings from Verification Audit.

**Audit Self-Assessment Sample**  Identification of farms in a Farm Management Group by the VB for completing the Self-Assessment Questionnaire as the basis for the FMG Volume Claim.

**Associate Auditor**  Auditor meeting the competency requirements for Associate Auditors defined in *FSA VB and Auditor Requirements*. Associate Auditors can only perform audits under supervision of a Principle Auditor.

**Benchmarked Scheme**  A sustainability scheme which has been benchmarked against the FSA as a point of reference to compare and evaluate the performance and level of quality of that sustainability scheme against the FSA.

**Benchmark Equivalence**  Indication that a Benchmarked Scheme covers the content of the FSA questions partially or at bronze/silver/gold level and meets the criteria for verification and governance.

**Deviation**  Difference in the answer to the same question in the Self-Assessment Questionnaire between an Audit Self-Assessment and the on-farm audit.

**External Claim**  Product-based Performance Level Claim to customers in the supply chain and/or consumers.

**Farm**  All land and facilities used for agricultural production activities, including non-productive areas under the management of an identified responsible person(s). A farm may be composed of several physical separate farm buildings and fields, producing the same crop(s)/product(s) in scope of the assessment.

**Farm Advisor**  Organisation or individual providing farm advisory services based on a contractual agreement.

**Farm Audit Sample**  Identification of farms in a Farm Management Group selected for the on-farm verification audit.
<p>| <strong>Farm Management Group (FMG)</strong> | A group of farms who together apply the self-assessment, on their own initiative (e.g. as a cooperative) or as part of the supply base of a trader, processor or company. |
| <strong>Farm Management Group Coordinator (FMGC)</strong> | Organisation legally representing the Farm Management Group. |
| <strong>Farm Management Group Manager</strong> | Individual within the FMG Coordinator carrying operational responsibility for FSA implementation. |
| <strong>FSA Management System</strong> | A documented internal management system to ensure the Stand-Alone Farm or Farm Management Group fulfils the requirements of the FSA Implementation Framework. |
| <strong>FSA Management System Audit</strong> | Third-party verification assessment of the Farm Management System against requirements outlined in the FSA Implementation Framework, as part of a Verification Audit. |
| <strong>Farmer</strong> | Representative of the farm with overall responsibility for the farm management. |
| <strong>Farm Sustainability Assessment (FSA)</strong> | Name of the SAI Platform tool to assess, improve and communicate social, environmental, economic and (good) agricultural practices. FSA is a list of essential, intermediate, and advanced questions. Depending on the coverage of these questions, the farmer can see at which sustainability Performance Level s/he performs. |
| <strong>FSA Volume Claim</strong> | Declaration that a volume of product from a Farm Management Group or Stand-Alone Farm is verified coming from farms that are at one or more FSA Performance Levels (i.e. Bronze/Silver/Gold). |
| <strong>Internal Self-Assessment Sample</strong> | Identification of farms in a Farm Management Group by the FMG for completing the Self-Assessment Questionnaire. |
| <strong>Letter of Attestation</strong> | Formal letter issued by a Verification Body to confirm the FSA Performance Level(s) of a Farm Management Group or Stand-Alone Farm. |
| <strong>On-Farm Audit</strong> | On-farm assessment by a Verification Body to verify the Self-Assessment is accurate and complete. |</p>
<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Principal Auditor</strong></td>
<td>Auditor meeting the competency requirements for Principle Auditors defined in <em>FSA VB and Auditor Requirements</em>. Principle auditors work on behalf of an approved Verification Body.</td>
</tr>
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<td><strong>Performance Level Claim</strong></td>
<td>Declaration of the FSA Performance Level (Bronze, Silver, Gold) by a Stand-Alone Farm, a farm in the FMG or the FMG.</td>
</tr>
<tr>
<td><strong>Self-Assessment Questionnaire</strong></td>
<td>Farm level questionnaire to assess sustainability performance resulting in a Farm Sustainability Assessment Performance Level Claim.</td>
</tr>
<tr>
<td><strong>Smallholder Farm</strong></td>
<td>See definition in Annex 5.</td>
</tr>
<tr>
<td><strong>Stand-Alone Farm</strong></td>
<td>Farm that applies the Self-Assessment Questionnaire directly and only to itself, without being part of a Farm Management Group.</td>
</tr>
<tr>
<td><strong>Stand-alone Farm Manager</strong></td>
<td>Representative of the Stand-Alone Farm with overall responsibility for the farm management, including the implementation of the FSA.</td>
</tr>
<tr>
<td><strong>Sustainability Scheme</strong></td>
<td>Framework for assessing the sustainability performance of farm operations.</td>
</tr>
<tr>
<td><strong>Verification Audit</strong></td>
<td>Act of reviewing, inspecting, or testing, to establish and document that a farm or Farm Management Group meets the claimed FSA performance level, and the requirements of the FSA Implementation Framework.</td>
</tr>
<tr>
<td><strong>Verification Body (VB)</strong></td>
<td>Organisation approved by SAI Platform for performing FSA Verification Audits.</td>
</tr>
<tr>
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<td>Audit Control Points – Self-Assessment Questionnaire</td>
<td>3.0</td>
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<td>Audit Control Points – FSA Management System</td>
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<td>Benchmarking Protocol</td>
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<tr>
<td>Benchmarking Overview</td>
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<td>Implementation Framework</td>
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<td>Requirements for FSA Verification Bodies and Auditors</td>
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<td>Self-Assessment Questionnaire</td>
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<tr>
<td>Third-Party Audit Guide for FMGs</td>
<td>3.0</td>
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<tr>
<td>Third-Party Audit Guide for Stand-Alone Farms</td>
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## Index 3: Farm Sustainability Assessment – Overview Guidance Documents

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<tr>
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<th>Version</th>
<th>Function</th>
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</thead>
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<tr>
<td><strong>Continuous Improvement Plan – Guidance and Templates</strong></td>
<td>3.0</td>
<td>Provides guidance to FMG Managers and Stand-Alone Farm Managers on how to develop, implement and monitor a Continuous Improvement Plan in line with FSA requirements.</td>
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<tr>
<td><strong>FSA Topic Guides</strong></td>
<td>3.0</td>
<td>Provides detailed insight to Farm Managers, and FMG Managers on a question level for the FSA Self-Assessment Questionnaire, how to answer ‘YES’ and resources for further learning.</td>
</tr>
<tr>
<td><strong>FSA Training Toolkit</strong></td>
<td>3.0</td>
<td>Provides customizable slide decks to train Farm Managers on sustainable agricultural practices in line with the questions in the FSA Self-Assessment Questionnaire. Designed with smallholder farms in mind.</td>
</tr>
<tr>
<td><strong>Guide for making FSA Statements and Claims</strong></td>
<td>3.0</td>
<td>Provides guidance to FMG Managers and Buyers on how to make statements and claims about the use and performance level against the FSA.</td>
</tr>
<tr>
<td><strong>Supply Chain User Guide</strong></td>
<td>3.0</td>
<td>Provides guidance to Buyers on how to apply the FSA in their supply chain.</td>
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## Index 4: Farm Sustainability Assessment – Overview of Online Tools

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<tr>
<td><strong>FSA HELPDESK</strong></td>
<td><a href="mailto:fsatool@saiplatform.org">fsatool@saiplatform.org</a></td>
</tr>
</tbody>
</table>
Index 5: Definition of a Smallholder Farm

There are two routes to being classified as a smallholder farm:

A. Legal

Legal Compliance with a legal definition of a SHF as determined by relevant local or national legislation and, where applicable, to a specific crop.

B. Profiling

Need to meet a minimum of three out of the following four criteria:

1. Self-identification as a SHF relative to the local context.
2. Individual plot size of up to two hectares, including:
   a. Communal land shared by villagers. Total hectarage divided by the number of households ≤ 2 ha.
   b. Gender-based farming. Farms and their activities and income have been divided by gender, where any given plot managed by either household sex is ≤ 2 ha.
3. Employment is primarily carried out by family members, with the following exceptions:
   a. Communal work. Communities taking collective responsibility for farming activities.
   b. Seasonal paid work limited to individual peak-demand activities. Examples could include land preparation, planting or harvesting.
4. Total household income from farming and other activities is below the national poverty line
## Index 6: Document Version History

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<td>20 April 2021</td>
<td>First introduction</td>
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