



REQUIREMENTS FOR CERTIFICATION BODIES

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Canadian Roundtable for Sustainable Beef
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The CRSB is not liable for any costs, or any potential, real or estimated loss of earnings resulting from any actions taken by a person or entity related to their participation in the program, including, without limitation, any actions taken prior to applying to become a Certification Body.

Table of Contents

1.0 INTRODUCTION	5
2.0 PROCESS STAGES FOR CERTIFICATION BODY APPROVAL	5
2.1 Process Stages.....	5
3.0 GENERAL REQUIREMENTS FOR CERTIFICATION BODY.....	6
3.1 Certification Contract.....	6
3.2 Liability and Financing	6
3.3 Non-Discriminatory Conditions	6
3.4 Confidentiality	6
3.5 Conflict of Interest Policy.....	7
4.0 STRUCTURAL REQUIREMENTS FOR CERTIFICATION BODIES	7
4.1 Organizational Structure	7
5.0 RESOURCE REQUIREMENTS FOR CERTIFICATION BODIES	7
5.1 Management of Competence for Assurance Personnel and Auditors Involved in the Certification Process.....	7
5.2 Training and Calibration for Assurance Personnel	8
5.3 Evaluation and Monitoring.....	9
5.4 Subcontracting	10
6.0 PROCESS REQUIREMENTS FOR CERTIFICATION BODIES	10
6.1 Certification Method	10
6.2 Audit Procedure.....	10
6.2 Audit Cycle for Clients	11
6.3 Use and Control of Certificates	15
6.4 Conditions for Withdrawals	15
6.5 Process for Withdrawals and Corrective Action.....	16
6.6 Changes Affecting Certification.....	16
6.7 Control of Documents and Records.....	17
6.8 Bi-annual Reporting to the Oversight Body.....	17
6.9 Internal Audits.....	19
7.0 APPROVAL AND ANNUAL REVIEW OF CERTIFICATION BODIES	19
7.1 Oversight Body Audit Methodology for Certification Body Approval.....	19
7.2 Audit Types.....	19

7.3 Audit Schedule and Process Phases for Certification Body Approval	20
Initial Phase: 3 year cycle	20
Renewal Phase: 5 year cycle	20
Legacy Phase: 8 year cycle	20
7.4 Certification Bodies Role in Supporting their Approval Audits.....	21
7.5 Certification Bodies Approval Audit Reporting and Corrective Actions	21
7.6 Oversight Body Evaluation of Certification Body Performance.....	21
7.7 Complaints and Appeals with Respect to the Certification Body	22
7.7.1 Applicability.....	22
7.7.2 Procedure	22
7.7.3 Appeals and Complaints Process.....	22
7.8 Termination or Suspension of Certification Body Approval	23
References.....	24

1.0 INTRODUCTION

The purpose of this document is to provide guidance for Certification Bodies that are seeking approval to conduct certification services on behalf of the CRSB. This is a supplemental document that supports the Assurance Protocol document. It is the responsibility of the Certification Body to familiarize themselves with all applicable CRSB documents. The organization seeking to become an accredited Certification Body may be categorized as a second-party or third-party assessment body in relationship to the Client, as defined in ISO/IEC 17000 International Standard: Conformity assessment – Vocabulary and general principles.

2.0 PROCESS STAGES FOR CERTIFICATION BODY APPROVAL

This section outlines the process stages to become an approved Certification Body.

2.1 Process Stages

1. Applicant

The Organization seeking to become an accredited Certification Body contacts the CRSB and undergoes a review and assessment by the Oversight Body.

2. Approved Certification Body

The Organization has received an approval letter from the Oversight Body confirming that the organization meets all Certification Body requirements. In addition, the organization has signed a delivery contract with the CRSB and the Oversight Body. The Organization may begin soliciting business but shall not perform any certification services until the Organization has achieved approval.

3. Accredited Certification Body

The Organization has completed the one-time training (for auditors) and has retained a minimum of one qualified auditor as defined in section 7.3. Once approval is achieved, the Organization may offer certification services.

4. Surveillance

The Oversight Body will review the performance of all Certification Bodies annually, at a minimum.

3.0 GENERAL REQUIREMENTS FOR CERTIFICATION BODY

This section outlines the CRSB's general requirements for Certification Body approval.

3.1 Certification Contract

The Certification Body shall have a legally enforceable written agreement for the provisions of certification and audit activities to its Clients. The contract shall include, at a minimum:

- A requirement for the Client to sign a self-declaration stating they are in compliance with all laws and regulations to the best of their knowledge.
- A requirement for the Client to disclose all other audited programs they are involved in, if any.
- Agreement by the Client that the full onus and responsibility for compliance with the requirements of the applicable CRSB Standards and Requirements, rests solely with them and that neither the CRSB, nor its certification bodies, assurance providers, auditors, delivery agents, or any other third parties engaged by CRSB, bear any responsibility for a Client's compliance with any such requirements.
- Agreement that the Client must, on request, supply any relevant information requested by the auditor.

(Adapted from ISO 17065)

3.2 Liability and Financing

The Certification Body shall have adequate arrangements to cover the liabilities arising from its operations including, at a minimum, insurance or reserves. In addition, the Certification Body shall have financial stability and resources required for its operations. (Adapted from ISO 17065)

3.3 Non-Discriminatory Conditions

The Certification Body shall have policies and procedures that are non-discriminatory. Certification Body services shall be accessible to all applicants whose activities fall within the scope of its operations by providing access to certification applications via its website, direct contact and through public and industry trade. Reasonable effort shall be made to provide the information in both English and French. (Adapted from ISO 17065)

3.4 Confidentiality

The Certification Body shall have a documented procedure in place to manage information obtained during the certification process. The procedure shall require (i) that all information obtained during the certification process is considered proprietary and treated as confidential, unless the Client agrees to make the information publicly available; and (ii) is handled in compliance with applicable privacy legislation. The Certification Body shall also meet the confidentiality requirements to be outlined in the CRSB contract. (Adapted from ISO 17065)

3.5 Conflict of Interest Policy

The Conflict of Interest Policy and Guidelines document can be found on the *Certified Sustainable Beef Framework* (the Framework) [website](#). All Certification Bodies must require their employees and auditors involved in CRSB certification services to sign an acknowledgement of having read and understood the Conflict of Interest Policy and Guidelines document, or an equivalent document as approved by the CRSB, to be kept on file by the Certification Body.

4.0 STRUCTURAL REQUIREMENTS FOR CERTIFICATION BODIES

This section outlines the CRSB's structural requirements for Certification Bodies.

4.1 Organizational Structure

The Certification Body shall provide documentation of its organizational structure, identifying duties, responsibilities and authorities that support the certification services including:

- Performing technical desk reviews and on-site audits;
- Conducting quality control of the desk review and on-site audit;
- Selling, or providing, CRSB certification services or approved equivalent; and
- Providing marketing or communication material related to the provision of CRSB certification services.

(Adapted from ISO 17065)

5.0 RESOURCE REQUIREMENTS FOR CERTIFICATION BODIES

This section outlines the CRSB's resource requirements for Certification Bodies.

5.1 Management of Competence for Assurance Personnel and Auditors Involved in the Certification Process

The CRSB will work with the Certification Body to train assurance personnel and auditors on Standard-related subject matter. This training will be offered via webinar, wherever possible, to reduce costs. Auditors must take an exam administered by CRSB and achieve a passing grade to demonstrate knowledge and understanding of the CRSB Standard.

Certification Bodies must have a procedure in place to demonstrate how they determine when an auditor is competent to conduct CRSB certification audits (e.g. minimum number of shadow or witness audits, supplementary training) and are responsible for any training for auditors to meet the CRSB Auditor Requirements.

Certification Bodies must have a documented procedure in place to calibrate assurance personnel and auditors and ensure consistency in assessment as outlined in section 5.2 Training and Calibration for Assurance Personnel.

Certification Bodies are required to monitor assurance personnel and auditors to ensure they continue to maintain the requirements set out by the CRSB.

The Certification Body shall have policies and procedures in place to manage the competence of their assurance personnel and auditors involved in the certification process. At a minimum, the Certification Body shall address:

- **General Knowledge of Staff involved in Certification Body Services:**
 - i. CRSB Standards knowledge
 - ii. Industry, farming and supply chain practice knowledge
 - iii. Local social and cultural knowledge
 - iv. Linguistic skills appropriate for each region where services are being offered in order to avoid the use of translators
- **Auditor Competence:**
 - i. For the complete list of auditor requirements refer to the Auditor Requirements document. This document is located on the [Framework website](#).
- **Certification Technical Reviewer Competence:**
 - i. Language proficiency to understand all documents relevant to assessing compliance.
 - ii. Ability to review documents and records and determine whether compliance is met.
 - iii. Ability to identify non-conformances in the records that may not be immediately apparent.
 - iv. Ability to analyze and cross check all relevant sources in order to identify conflicting information and make judgements about the validity of information received in order to reach an objective conclusion.
 - v. Ability to conduct impartial and objective evaluations of the information gathered in order to determine compliance.
 - vi. Ability to be courteous and professional when reporting instances or situations of non-compliance.
 - vii. Ability to maintain the confidentiality of proprietary information.
 - viii. Ability and commitment to reporting findings in a timely manner.
- **Communication Process:**
 - i. Certification Bodies shall have a process for communicating to staff, all the applicable guidance from CRSB and the Oversight Body, including relevant responses to Interpretation Requests and other relevant documents published by the CRSB.

5.2 Training and Calibration for Assurance Personnel

Certification Body training is required for Certification Body personnel responsible for providing CRSB certification services.

The Certification Body training shall include at a minimum:

- **CRSB Course (provided via webinar):** The CRSB will work with the Certification Body to provide training to the auditors. This course will include an overview of CRSB Standard-related subject matter.

- **CRSB Course Exam:** Auditors shall take an exam and achieve a passing grade to demonstrate knowledge and understanding of the CRSB Standard.
- **Certification Technical Reviewer Training:** The Certification Body shall have a procedure in place to demonstrate how they determine when a technical reviewer is competent to conduct CRSB certification technical reviews for assurance (e.g. supplementary training, verbal interview, test or examination) and are responsible for any training for technical reviewers to meet the CRSB Certification Technical Reviewer Competence identified above.

The calibration training shall include at a minimum:

- **Annual Calibration Session:** The Certification Body shall hold an in-person or remote calibration session every year for both auditors and technical reviewers. This should be organized in collaboration with the CRSB.
- **Auditor Consistency:**
 - i. Minimum of 3 annual audits (unless Client demand does not allow for this).
 - ii. Attend or participate in auditor consistency sessions held by the Certification Body.
 - iii. Obtain successful performance evaluations through periodic witness audits or other means of evaluation to retain qualified auditor status. If auditors do not maintain their qualified status, the Certification Body will notify them and the CRSB.
- **Certification Technical Reviewer calibration:**
 - i. Reviewer does a minimum of 3 technical reviews (i.e. audit reports or annual assessments) (unless Client demand does not allow for this).
 - ii. Attend or participate in any technical reviewer consistency sessions held by the Certification Body.
 - iii. If the technical reviewer does not maintain their competency, the Certification Body will notify them and the CRSB.

5.3 Evaluation and Monitoring

The CRSB via the Oversight Body shall review the Certification Body's auditor training and monitoring system as part of the annual review.

Certification Bodies shall keep at a minimum:

- A list of qualified auditors, records to demonstrate auditor participation in consistency sessions and performance during witness audits. They shall regularly review audit reports for completion.
- A list of qualified auditors and the training status (i.e. trained, in-training, removed) of each individual. They shall keep records of qualified auditors' re-evaluations and continuing education performance.

The CRSB, or its agent, may audit the records of the Certification Body on a periodic basis to ensure compliance with all aspects of auditor requirements. The records audit shall be scheduled to provide the Certification Body with reasonable notice.

5.4 Subcontracting

The Certification Body shall take responsibility for all activities outsourced to another body and must ensure the outsourced or contracted activities and personnel meet the CRSB's requirements. The Certification Body shall have a legally binding written contract with the body providing the sub-contracted service. (Adapted from ISO 17065).

6.0 PROCESS REQUIREMENTS FOR CERTIFICATION BODIES

This section outlines the CRSB's process requirements for Certification Bodies.

6.1 Certification Method

The Certification Body shall have documented policies and procedures that require evidence to be supplied in order to demonstrate conformance with the specified requirements of CRSB Standard(s) and/or Chain of Custody Requirements. The Certification Body shall assess the integrity of the evidence provided and use their professional judgement when necessary. Some evidence can be verified; however, when evidence is provided internally, or by suppliers, and there is no standard method for verifying the integrity of the information, the Certification Body shall use their professional judgement. When assessing the integrity of evidence, the Certification Body shall, at a minimum:

- Confirm the evidence supplied is sufficient to meet the requirements of the relevant Standard(s) or Chain of Custody Requirements.
- Confirm the evidence is dated, as appropriate.
- Ensure that evidence supplied by other parties includes a determination or evaluation identifying the individual responsible for the decisions and their authority for making the decision.

6.2 Audit Procedure

The audit process is initiated when a Client contacts a Certification Body to schedule an audit. The Certification Body shall have the following procedures documented:

- How the audit or assessment fee is determined.
- The information collected in the Client's application and how it is used to appropriately carry out the certification services and the audit (e.g. the applicable Standard or Chain of Custody Requirements, general features of the Client –name and address, staff or employees, site location, size, topography, surface waters, buildings and structures, biosecurity, physical access requirements/clearances, personal protective equipment).
- Process for selecting the appropriate auditor.
 - Certification Body ensures that the auditor has signed the Conflict of Interest Policy and Guidelines or equivalent, and if any conflicts or potential conflicts have been cited (e.g. by Client, auditor, Certification Body staff, etc.), the procedures governing their resolution (as outlined herein) are followed.
- Process for developing the audit plan (e.g. scope, locations to be visited as part of the audit, on-site guide, persons to be interviewed, process for closing meeting if necessary). Every audit must be preceded by discussion on the scope of the audit.
- Process for audit reporting and submission of the report to the Certification Body by the auditor.

- Process for assessment of reports for consistency and individual responsible for this task.
- Process for reporting audit and/or assessment results to Clients. At a minimum the audit report and/or assessment results to the Client shall include the level achieved for each indicator, the numeric score for each indicator, total score on the audit and a brief summary on each principle confirming the final result of the audit decision.

The Certification Body considers: scheduling (e.g. auditor should see the location during different seasons), logistics (e.g. if multiple auditors are needed they will all be on-site at the same time), and impartiality when selecting an auditor (e.g. ensures that the auditor has signed the Conflict of Interest Policy and Guidelines). The audit must take place within a reasonable amount of time following the Client's request.

The auditor is responsible for ensuring they have all the information, instructions, procedures and materials needed to complete the scope of work. The Certification Body or auditor must prepare an audit plan prior to the audit to ensure time on-site is maximized and the auditor is prepared.

For future audits or annual assessments, Certification Bodies must send at least one notification to Clients that their certification is expiring.

Auditors shall record the length of time taken for every audit.

6.2 Audit Cycle for Clients

Certification Bodies shall adhere to the following audit cycle for their Clients.

Certification Bodies shall conduct a risk assessment based on the initial audit findings and place the Client in the appropriate audit cycle category (i.e. standard, low or high risk). The following shall be considered and used to provide rationale as to the risk categorization:

- Performance and number of corrective actions on the critical indicators (for beef producers and beef processors);
 - Risk to watershed health, manure control, food safety, worker health and safety, animal care, crop input use;
- Performance on previous assessments (if applicable).

Notes for further guidance:

- The risk categorization can change within the audit cycle after three years of consecutive exemplary performance.
- Random audits as necessary at the discretion of the Certification Body and related to program risk.
- Trigger audits are based on high risk incidence(s) contrary to expected program outcomes, regulatory infraction, negative legal action, significant change in management system or complaints that can be substantiated
 - Client pays for trigger audits. CRSB to pay if conducting spot checks, for example, regarding the certification framework.
- Audit cycle plus 2 months (60 days) between audit and re-certification audit maximum.

Box 1. Audit Cycle

a. Standard audit cycle (5 years)

- Year 1: full on-site audit

The following years must consist of:

- 1 partial records assessment (on-site/desktop, optional)
- 3 self-declarations (not all consecutive)

b. Low risk (6 years)

- Year 1: full on-site audit

The following years must consist of:

- 2 partial records assessment (on-site/desktop, optional)
- 3 self-declarations (not all consecutive)

c. High risk (5 years)

- Year 1: full on-site audit

The following years must consist of:

- 3 full records assessments (on-site/desktop, optional)
- Additional full on-site audit
- No self-declarations

Definitions and purpose of different types of Client assessments (see Table below):

Type of Audit		Involved Parties
On-site	<p>Definition: On-site audit conducted by a Certification Body auditor to assess conformance to the CRSB standard or approved equivalent. An onsite audit can also be triggered by a change in management or ownership.</p> <p>Occurrence: See audit cycle for detail based on risk category.</p>	<p>Pays: Client</p> <p>Conducted by: Certification Body</p>
Partial Records Assessment	<p>Definition: The Client must provide select records to the Certification Body by email, video conference, or mail by a particular date specified. This can also be provided on-site if requested by the Client. This is a cost efficient way to provide second or third-party assurance on an annual basis, while reducing the time burden and cost to the Client.</p> <p>Occurrence: See audit cycle for detail based on risk category.</p>	<p>Pays: Client</p> <p>Conducted by: Certification Body</p>
Full Records Assessment	<p>Definition: The Client must provide all records required for CRSB certification to the Certification Body by email, video conference, or mail by a particular date specified. This can also be provided on-site if requested by the Client. This is a cost efficient way to provide second or third-party assurance on an annual basis, while reducing the time burden and cost to the Client.</p> <p>Occurrence: See audit cycle for detail based on risk category.</p>	<p>Pays: Client</p> <p>Conducted by: Certification Body</p>
Self Declaration	<p>Definition: The Client must complete a self-declaration and submit by electronically or by mail by the date specified by the Certification Body to maintain certified status.</p> <p>Occurrence: See audit cycle for detail based on risk category.</p>	<p>Pays: Client</p> <p>Conducted by: Certification Body</p>

<p>Random Audit</p>	<p>Definition: A sampling of certified operations selected by the Certification Body and reported to CRSB to enhance rigour or used to check on specified aspects of an auditor or Client’s performance. Random audits do reset the cycle timing and are used to enhance credibility of the conformance system. Random audits add to the integrity of the CRSB Framework.</p> <p>Occurrence: A random audit can occur at any time, and may or may not be unannounced.</p>	<p>Pays: Certification Body</p> <p>Conducted by: Certification Body</p>
<p>Trigger Audit</p>	<p>Definition: an audit that is triggered by: alert of a high-risk situation, flagged by a complaint, or changes that would affect a Client’s existing certification to the applicable CRSB standard(s). Trigger audits do not reset the cycle timing; the Certification Body must report all trigger audits to CRSB bi-annually. Trigger audits add to the integrity of the CRSB Framework.</p> <p>Occurrence: A trigger audit can occur at any time.</p>	<p>Pays: Based on scenario (Client or CRSB)</p> <p>Conducted by: Certification Body or CRSB</p>

6.3 Use and Control of Certificates

Certification Bodies shall have a documented procedure for issuing and managing certificates.

At a minimum the documented procedure shall address the following:

- Clients must agree to the terms and conditions in the CRSB Communications and Claims Policy if making claims or promoting CRSB certification status.
- The Certification Body is required to send the Client the Communications and Claims Policy along with the certificate. These restrictions include:
 - Unless otherwise revoked, certificates issued to Clients are valid as long as the Client is certified.
 - Full audits and annual assessments are conducted as scheduled.
 - Clients shall not reproduce the actual certificate; additional copies may be requested in writing.
- Termination of certificates. CRSB certificates may be withdrawn if Client violates the above noted terms and conditions;
 - at any time with the agreement of the Certification Body and Client; and/or
 - at any time by the CRSB or Certification Body if the conditions for certification are not respected and/or the certificate is withdrawn from the Client.

Certification Bodies are responsible for making the certification decision and determining if certificates are re-established or withdrawn. The CRSB also reserves the right to withdraw certificates.

6.4 Conditions for Withdrawals

Certification Bodies shall have a documented procedure for managing the withdrawal of certified Clients. At a minimum, the documented procedure shall include the following:

Certified Clients assume specific responsibilities under the terms and conditions for CRSB Communications and Claims Policy. The conditions that may result in the withdrawal of a Client's certification include:

- a) Standard requirements, Chain of Custody requirements or equivalent are not maintained;
- b) Cooperation and access to documentation, facilities and personnel are not provided to auditors during on-site audits;
- c) Client does not permit an audit to be conducted;
- d) Client does not submit annual assessments when required or does not agree with or does not sign the declaration or assessment;
- e) Client uses the CRSB certificate in ways that conflict with the requirements outlined in the Communications and Claims Policy;
- f) Client volunteers withdrawal or circumstance warrants temporary suspension
- g) Certificate expires; or
- h) Other matters or circumstances arising in connection with a Client which may in the sole opinion of the CRSB, in any way compromise the integrity or reputation of the CRSB or its Standards or Chain of Custody Requirements.

Should the Client fail to meet any of the above conditions, the Certification Body may withdraw the Client's certificate.

6.5 Process for Withdrawals and Corrective Action

The Certification Body shall have a documented procedure to address withdrawal of Client certification and corrective action. The process followed by the Certification Body in the event that a Client fails to meet any of the above conditions, is:

- The Certification Body shall send written correspondence to the Client outlining results of current assessment, and if needed, requesting corrective action within the timeline noted below or the Client will not achieve or maintain certification.
 - **Entry Threshold:** certification cannot be achieved and a re-audit is necessary (in person or virtual) to follow up on any Entry Threshold(s) identified, timeframe must be appropriate to the Entry Threshold identified
 - **Achievement level:** corrective action taken and verified within 45 days with some exceptions
 - Certificate is issued after the corrective action is implemented and found to be acceptable by the Certification Body
 - **Innovation and Excellence levels:** no corrective actions are required since these are not requirements for certification in either Standard
 - Above timing of withdrawal may be adjusted by Certification Body on a special case basis.
- If the Client does not respond within the timeframes noted above, the Certification Body sends a written notice stating that the Client's certificate will not be issued, or for a Client with an existing certificate (active CRSB status), that the certificate will be withdrawn in 45 days if corrective action is not taken, unless more time is required to complete the corrective action, in which case the Client must request additional time from the Certification Body and obtain approval from the Certification Body prior to the 45 days.
- If the Client takes no action, the Certification Body issues a written notification to inform the Client that his/her/its certificate is withdrawn.
- The Certification Body removes the Client from their list of certified Clients.
- If a Client wishes to recover CRSB certification after having their CRSB certificate withdrawn, the Client must start the certification process from the beginning.

If an appeal is in process, the withdrawal procedure may be suspended pending the outcome of the appeal.

6.6 Changes Affecting Certification

The Certification Body shall have documented policies and procedures in place addressing how to handle changes that are initiated by the Client. At a minimum the procedures shall include:

- A contractual obligation between the Certification Body and Client requiring that the Client immediately disclose any changes that would affect certification. This may include process or management changes.
- If a Client is transferring from one Certification Body to another, the new Certification Body shall require Clients to disclose previous enrollment with

- another Certification Body and provide a copy of the latest audit report or audit findings and corrective actions.
- The Certification Body shall have a procedure in place to review, evaluate, and issue revised certification documentation as needed.

6.7 Control of Documents and Records

Certification Bodies must keep all certification-related records for a minimum of six years. The CRSB reserves the right to access certification records at any time, in accordance with privacy laws.

Records will be stored electronically and backed up regularly. It is understood that it may take some time for some programs to transition to an electronic system.

Individual Client data are confidential. Certification Bodies must provide evidence as to how confidentiality in the data collected will be maintained (including proof of backup systems and off-site storage for electronic records).

Certification Bodies will give Clients the option to make their name and certificate number public. Upon authorization from a Client, Certification Bodies must list the name and certificate number of each Client on their website; some Clients may choose not to have their name and certificate number published, in which case their information is kept confidential.

6.8 Bi-annual Reporting to the Oversight Body

The Certification Body shall have a procedure in place to electronically submit the below information to the CRSB and Oversight Body on a bi-annual basis (every six months). This information will be used in aggregate reporting only, to maintain confidentiality of Client information. The reports shall be submitted in Excel format and submitted to info@CRSBcertifiedsustainablebeef.ca

Producer/Processor/Chain of Custody Certification Information	Certification Body Level
<p>Aggregated information reported to CRSB by Certification Body</p> <ul style="list-style-type: none"> • # of operations certified <ul style="list-style-type: none"> ○ by standard/requirement ○ by province ○ by sector • # of operations with failed audits <ul style="list-style-type: none"> • by standard/requirement • by province • by sector 	<ul style="list-style-type: none"> • # trigger audits, reasons • # of auditors trained • Conflicts of interest, resolution • Complaints / appeals, resolution • Scoring system used (for equivalencies) • Feedback on auditor training program • Reason for failed audits • Challenges, opportunities for CRSB to consider

Sustainable Beef Production Standard	Sustainable Beef Processing Standard
<p># of operations scored in each level:</p> <p><u>Natural Resources</u></p> <ul style="list-style-type: none"> • Riparian areas, wetlands, surface and ground water sources and nutrient runoff are responsibly managed to help maintain or enhance watershed health. • Grasslands, tame pastures and native ecosystems are maintained or enhanced. <p><u>People and the Community</u></p> <ul style="list-style-type: none"> • A healthy and safe work environment is provided. <p><u>Animal Health and Welfare</u></p> <ul style="list-style-type: none"> • Animal health and welfare is monitored and maintained as per the relevant National Farm Animal Care Council Code of Practice; sick and injured animals are treated appropriately. • Animal health products are responsibly used and disposed. <p><u>Food</u></p> <ul style="list-style-type: none"> • Operation contributes to the production of safe food. 	<p># of operations scored in each level:</p> <p><u>Natural Resources</u></p> <ul style="list-style-type: none"> • Water resources are responsibly managed. <p><u>People and the Community</u></p> <ul style="list-style-type: none"> • A safe and healthy work environment is provided. <p><u>Animal Health and Welfare</u></p> <ul style="list-style-type: none"> • Cattle are regularly monitored and have sufficient quantity and quality of water and feed, when required, to meet their physical needs. • Compromised and sick animals are managed appropriately. <p><u>Food</u></p> <ul style="list-style-type: none"> • A food safety program is followed. • Efforts are made to reduce food waste.

6.9 Internal Audits

Internal audits are a systematic, objective and documented process for obtaining and evaluating evidence to confirm the CRSB requirements are being met. An annual internal audit by a qualified person who is knowledgeable in the applicable CRSB Standard(s) and/or Chain of Custody Requirements and assurance protocols is required.

7.0 APPROVAL AND ANNUAL REVIEW OF CERTIFICATION BODIES

7.1 Oversight Body Audit Methodology for Certification Body Approval

The Oversight Body shall perform the first onsite Audit Schedule and Process Phases (see section 7.3), unless certain circumstances require additional auditing.

7.2 Audit Types

Full on-site audit: on-site audit conducted by the Oversight Body to assess conformance to the CRSB Certification Body Requirement document or approved equivalent. An onsite audit can also be triggered by changes in management or ownership.

Trigger audits – an audit that is triggered by: alert of a high-risk situation, flagged by a complaint, or changes that would affect a Certification Body’s existing CRSB Certification Body approval. Trigger audits do not reset the cycle timing; the Oversight Body must report all trigger audits to CRSB bi-annually. Trigger audits add to the integrity of the Framework.

Self-declaration – The Certification Body shall complete a Self Declaration form and submit electronically or by mail by the date specified by the Oversight Body to maintain accredited status.

Partial records assessment – The Certification Body shall complete a “Partial Records Assessment” form and submit electronically or by mail by the date specified by the Oversight Body. This is a cost efficient way meeting the desire to have an audit every 15-18 months while reducing the time burden on the Certification Body and support participation.

7.3 Audit Schedule and Process Phases for Certification Body Approval

Initial Phase: 3 year cycle

Year 1-3: During the first three years of approval, a minimum of 1 full on-site audit (FA) at the primary facility(s) where the certification services are supported, shall occur within 12 months of the Certification Body's first client. A minimum of 1 on-site shadow field audit (SFA) shall also occur within the first three years of approval, and once the Certification Body obtains their first client. An annual remote desk audit will occur during the years there is no onsite facility or onsite shadow field audit. CRSB and the Oversight Body obtain the right to conduct additional audits at any time if circumstances arise, such as complaints.

Renewal Phase: 5 year cycle

If the Certification Body completes their first 3-year audit cycle successfully, and there are no issues, complaints or additional training needed, the Oversight Body may promote the Certification Body to the Renewal Designation with a 5-year audit cycle. The 5-year audit cycle may include:

Year 4*	Year 5*	Year 6*	Year 7*	Year 8*
FA or PRA	PRA	SD	PRA	PRA

Full on-site audit (FA), Partial records assessment (PRA), Self-declaration (SD), Shadow Field Audit (SFA)

*A Shadow Field Audit (SFA) shall be conducted a minimum of 1 time per 5-year cycle. The SFA will be scheduled at an agreed upon time by the Certification Body, Oversight Body and auditor.

If the Certification Body does not complete the requirements of the initial 3-year audit cycle or there are issues, complaints or additional training needed, the Certification Body shall continue with the 3-year audit cycle until all requirements have been met.

Legacy Phase: 8 year cycle

After 8 years of uninterrupted service with CRSB, the Certification Body may apply for Legacy designation. Legacy designation is a reduced scope of audit and is scheduled based on the results of each previous audit.

The Oversight Body and CRSB reserve the right to conduct audits at any time if circumstances arise that bring the Certification Body's practices into question.

7.4 Certification Bodies Role in Supporting their Approval Audits

In order to maintain CRSB approval, the Certification Body shall be responsible for:

- Coordinating with the Oversight Body to schedule the audit;
- Making necessary personnel, records, and facilities available for the Oversight Body to conduct the audit;
- Providing a knowledgeable employee, who is fluent in English, to guide the audit and to act as a liaison to assist the Oversight Body with obtaining and interpreting the necessary audit evidence; and
- Developing corrective action plans in response to each identified non-conformance, and implementing the plan to correct them in a timely manner.

7.5 Certification Bodies Approval Audit Reporting and Corrective Actions

At the close of each approval audit, the Oversight Body shall provide a draft audit report to the Certification Body in English within 30 days of completing each audit. The audit report shall identify:

- General audit information including the location of the facility(s), the Certification Body staff that participated, and the scope of the audit
- Evidence obtained and reviewed
- Decision of conformance or non-conformance for each requirement
- Opportunities for improvement (if any). Opportunities for improvement may include observations of inefficiency or ineffectiveness. This is an opportunity for the Oversight Body to promote continuous improvement and risk reduction by reporting opportunities for improvement.

The Certification Body shall have 30 days from receipt of the audit report to respond to the Oversight Body in writing with a proposal for corrective action and a timeline for completing the plan for each identified non-conformance. The Oversight Body will have 15 days from receipt of the Certification Body's corrective action plan, to communicate to the Certification Body the acceptability of the proposed action and the method and timeframe for follow up. To officially resolve the non-conformance, the Certification Body, shall provide evidence of correction via email to the Oversight Body for review and final approval. In some circumstances, the Oversight Body may decide to evaluate it at the next scheduled audit.

7.6 Oversight Body Evaluation of Certification Body Performance

The Oversight Body shall review the following Certification Body performance items in addition to the required items identified in this document.

- Number of Clients and certificates issued.
- Any complaints (See Section 7.7: Complaints and Appeals with Respect to the Certification Body).
- Other items that may be developed by CRSB or the Oversight Body.

7.7 Complaints and Appeals with Respect to the Certification Body

The following organizations are responsible for appeals and complaints:

CRSB - responsible for managing and resolving appeals and complaints that cannot be resolved by the Certification Body, and complaints that are received directly by the CRSB. The CRSB also manages appeals and complaints related to the *Certified Sustainable Beef* certification mark and Communications and Claims Policy. Contact: info@CRSBcertifiedsustainablebeef.ca.

Certification Body – responsible for managing and resolving appeals and complaints associated with their certification services. Certification Bodies may consult with the CRSB on decisions and must report all appeals and complaints to the CRSB.

Clients, Auditors, the Public - Anyone who has an appeal or complaint is responsible for reporting appeals and complaints to the Certification Body, Oversight Body or CRSB.

7.7.1 Applicability

The appeals and complaints procedure applies unless Canadian legislation requires that such appeals and complaints be addressed in accordance with Canadian laws.

7.7.2 Procedure

The Certification Body must have a documented procedure for receiving and resolving appeals and complaints from Clients, auditors and any other stakeholders related to the CRSB certification services they provide. They must have a dedicated individual that is publicly identified (e.g. on the organization's website) for stakeholders to contact. The appeals and complaint procedure must also be publicly available and include a reasonable time for confirming receipt of the complaint and an estimated resolution date.

Appeals and complaints must be submitted and handled as outlined in the steps below. The procedure applies to Certification Bodies and the CRSB.

7.7.3 Appeals and Complaints Process

1. Person or organization appealing or complaining contacts the Certification Body or CRSB and presents their case.
2. Certification Body or CRSB confirms receipt within a reasonable timeframe; provides the appellant or complainant an estimated timeline for resolution; reviews, and investigation; and subsequently notifies the appellant or complainant of the resolution.
3. If the resolution is unsuccessful by the Certification Body, the case is presented to the CRSB, who reviews and makes a decision.
4. CRSB informs appellant/complainant in writing of decision.
5. CRSB records decision.

7.8 Termination or Suspension of Certification Body Approval

CRSB, together with the Oversight Body, may suspend or terminate the approval of a Certification Body at any time. Termination is cancellation of the agreement between the Oversight Body, CRSB and the Certification Body and bars the Certification Body from providing CRSB certification services.

A Certification Body's approval may be terminated or suspended if:

- A Certification Body violates the terms of their contract with CRSB, the Oversight Body, or their Clients.
- The Certification Body volunteers to remove itself from the approval.
- Non-conformance's identified during an audit performed by the Oversight Body that remain uncorrected beyond the time specified by the Oversight Body for corrective action.
- Cooperation and access to documentation, facilities and personnel are not provided to the Oversight Body during audits.
- The Certification Body does not permit an audit to be conducted.
- The Certification Body does not submit a self-declaration or partial record assessment form when required or does not agree with or does not sign the declaration or assessment.
- The approval expires.
- The Certification Body has not obtained self-declarations from their Clients indicating they are in compliance with all laws and regulations.
- Other matters or circumstances arising in connection with a Certification Body which may, in the sole opinion of the CRSB, or upon recommendation by the Oversight Body to the CRSB, in any way compromise the integrity or reputation of the CRSB or its Standards.

In the event that a Certification Body's approval shall be terminated or suspended, a meeting among the Oversight Body, CRSB and the Certification Body may occur to discuss the reason for termination or suspension.

If a Certification Body's approval must be suspended, the Certification Body shall present the Oversight Body with a plan and timeline for describing how they will correct the issue that resulted in suspension.

If a Certification Body is terminated:

- CRSB and the Oversight Body shall submit a letter of intent to terminate the Certification Body.
- If a resolution to the termination is not found, CRSB and the Oversight Body shall ensure that the Certification Body's Clients are informed of the pending termination.
- If a Certification Body is terminated, the Certification Body shall transfer all Client records, reports and any other information to the Oversight Body to support a timely transition to a new Certification Body, in accordance with privacy laws.

References

ISO/IEC 17000:2004 - Conformity assessment – Vocabulary and general principles.
ISO/IEC 17065:2012(en) - Conformity assessment – Requirements for bodies certifying products, processes and services.