Fairtrade International Oversight Procedure

Version 1.3

Contact for comments and information: assurance@fairtrade.net
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Introduction

Fairtrade sees assurance and licensing as a key element for the implementation of our Theory of Change. The provision of assurance and licensing is therefore not seen as a purely technical matter but as a function owned by stakeholders, as with any other aspect of Fairtrade work. Fairtrade also understands assurance and licensing as tools for learning, providing valuable input for the development of appropriate standards, its verification and the support needed to implement them. This requires direct involvement of Fairtrade members into the design and oversight of these mechanisms whilst preserving their independence.

Following this intention, Fairtrade operates a closed assurance and licensing scheme, with a limited number of assurance and licensing bodies, all being either members or subsidiaries of Fairtrade International, ensuring an alignment of their mission. This model is the result of a strategic decision that believes that for Fairtrade a closed and mission-aligned scheme responds better to Fairtrade objectives, reduces risks and is more accessible for users.

The current list and scope of assurance providers and licensing bodies that can operate in the Fairtrade scheme is as follows:

- Assurance provider for producer certification, and traders in producing countries: FLOCERT.
- Assurance providers for trader certification in consuming countries: Fairtrade Australia & New Zealand, Fairtrade Canada, Fairtrade Foundation UK, Fairtrade Label Japan, Fairtrade Belgium, Fairtrade Netherlands and Fairtrade Luxemburg, in their respective countries or FLOCERT.
- Licensing bodies: all National Fairtrade organizations in their respective countries, National Marketing Organisations for a limited scope of licensing in their respective countries and Fairtrade International in any other country.

The higher governance bodies of Fairtrade International are the only ones with authority to modify this strategy and open up assurance and/or licensing to other bodies, in which case Fairtrade may define new criteria for acceptance in the scheme beyond compliance with the Requirements for Assurance Providers and Licensing Bodies (RAPs and RLBS).

In June 2015 the Requirements for Licensing Bodies and Requirements for Assurance Providers were approved and became applicable. These requirements respond to the objective to further strengthen the credibility and the harmonisation of all assurance and licensing activities in the Fairtrade system, as well as to comply with the new ISEAL Assurance Code.

Only new bodies that enter the Fairtrade scheme after the publication of this procedure are required to go through the initial approval process.

Scope of application

This document sets out all requirements for the operation of the Fairtrade International oversight system.
Normative documents

The following documents contain provisions, which, through reference in this text, become part of this procedure.

a) The Fairtrade International Requirements for Assurance Providers (RAPs)
b) The Fairtrade International Requirements for Licensing Bodies (RLBs)
c) ISO 19011 Guidelines for auditing management systems
d) The Oversight Committee Terms of Reference

Terms and definitions

Assurance Provider: any organisation, or part of it, that is allowed by Fairtrade International to perform assurance against Fairtrade Standards. Their activities are regulated by Fairtrade’s Requirements for Assurance Providers in compliance with ISEAL Assurance Code (see the Requirements for Assurance Providers for a more detailed definition).

Licensing Body: any organisation or part of an organisation that is allowed by Fairtrade International to perform specific licensing activities. These organisations can be National Fairtrade Organisations, Fairtrade Marketing Organisations, or Fairtrade International itself (see Requirements for Licensing Bodies for a more detailed definition).

Oversight: bodies, functions and processes put in place by Fairtrade International to ensure the effectiveness of both assurance and licensing activities.

Oversight Committee: a multi-stakeholder subcommittee of Fairtrade International’s Standards Committee responsible for the implementation of this procedure and for the regular evaluation of the effectiveness and adequacy of Fairtrade’s assurance and licensing (see the Terms of Reference of the Oversight Committee for more information).

An organisation may be at the same time, an Assurance Provider and a Licensing Body. For the purpose of this document however those activities will be considered separately and independent from each other. Even if oversight activities may be coordinated for efficiency, decisions on compliance as a Licensing Body and as Assurance Provider will be different decisions.

See the ISEAL Assurance Code for other definitions.

Responsibility for this procedure

The Fairtrade International Oversight Committee (OC) has responsibility for this document, and will periodically review it.
1 General requirements

1.1 Resources

1.1.1 Fairtrade International shall create the position of Assurance Manager with the responsibility to ensure Fairtrade International’s conformity with these procedures, and provide this position with the required financial and human resources to perform this function.

1.1.2 Assurance Providers and Licensing Bodies shall dedicate the required financial and human resources to implement the procedures that are relevant to them at their respective organizations.

2 Initial approval

2.1, 2.2, 2.3 and 2.4 only apply to licensing bodies and assurance providers that are not already in operation by the time of initial publication of this procedure. 2.5 only applies to said organizations.

2.1 Application

2.1.1 Applications shall include:

2.1.1.1 A completed self-assessment form

2.1.1.2 Copies of all documents required by the self-assessment form

2.1.1.3 If necessary, an explanation of how requirements have been met.

2.1.2 Fairtrade International shall review the application form for completeness.

2.1.2.1 If the form is incomplete, Fairtrade International shall advise the applicant of this fact, and will not process the application until all missing information has been provided.

2.1.3 Once the application is complete, the Assurance Manager shall enter the applicant into the register of applicant and approved bodies.

2.2 Initial assessment

2.2.1 The Assurance Manager shall approve assessors to undertake an initial assessment (for appointment see section 4) and verify the assessment Terms of Reference provided by the Assurance Providers.

2.2.2 Assessors shall carry out assessments following guidance provided in ISO 19011.

2.2.3 Assessors shall carry out an off-site document review to ensure that documents indicate that the applicant will be capable of demonstrating conformity during the on-site assessment.

2.2.3.1 Assessors shall provide a preliminary written report to the applicant indicating areas of apparent non-conformity, and indicating any issues that will be further explored during the on-site assessment.
2.2.3.2 The applicant shall share this preliminary report with Fairtrade International, providing a translated version if the original report is not in English.

2.2.4 The applicant may choose to correct any areas of non-conformity prior to the on-site assessment.

2.2.5 The on-site assessment shall include:

2.2.5.1 A minimum of one person day examining documents and records in the applicant's office for evidence of conformity.

2.2.5.2 For Assurance Providers the on-site assessment must include witnessing audits.

2.2.5.3 A closing meeting at which preliminary assessment findings are presented.

2.2.6 Assessors shall complete an assessment report using the report template provided by Fairtrade International and share it with the applicant and Fairtrade International.

2.2.6.1 The report shall include the assessment of all requirements in the RAPs and/or RLBs as applicable.

2.2.6.2 The reports must clearly identify any requirement that is not complied with, the description of the non-conformity together with objective evidence.

2.2.6.3 The report can grade non-conformities as minor, major or critical. Observations can also be recorded.

2.2.6.4 The applicant shall share the report with Fairtrade International, providing a translated version if the original report is not in English.

2.3 Report review and follow up

2.3.1 The Assurance Manager shall either undertake or appoint staff to undertake a review and evaluation of each assessment report.

2.3.2 The assessment report review shall verify that:

2.3.2.1 The report is complete and readable.

2.3.2.2 Findings of conformity and non-conformity are supported by objective evidence and correctly interpret the requirements in the RAPs and RLBs.

2.3.2.3 If this is not the case the reviewer will ask for amendments to the report.

2.3.2.4 The reviewer shall present the results of the review to the applicant, including a final list of non-conformities (if any) for applicant's follow up.

2.3.2.5 Upon receipt of the final list of non-conformities applicants may request a variation from the RAPs and/or RLBs (see section 4.6).

2.3.2.6 Applicants shall submit to the Assurance Manager for approval a proposed corrective action plan for all non-conformities.

2.3.2.7 Unless variations are accepted, non-conformities shall be closed within timeframes agreed by the Assurance Manager and the applicant, such timeframes shall not exceed 12 months.
2.3.2.8 Non-conformities are closed by presenting to the Assurance Manager the evidence of effective implementation of the agreed corrective actions.

2.4 Decision after initial assessments

2.4.1 Once all non-conformities have been closed or the deadline for it has expired the Assurance Manager shall make
- A recommendation for declaration of conformity, or

2.4.2 A recommendation that conformity is not declared. The Assurance Manager shall present a substantiated recommendation paper to the OC for decision.

2.4.3 The OC members shall review the paper and make comments either supporting or disagreeing with the recommendation presented by the Assurance Manager.

2.4.4 The OC members shall document the reasons why the recommendation is supported or not.

2.4.5 If the majority of OC members recommend that conformity is declared the Assurance Manager shall make the recommendation to the Board to approve the applicant.

2.4.6 If the majority of OC members recommend that conformity is not declared:

2.4.6.1 The Assurance Manager shall advise the applicant that their application has been declined and the applicant will be asked to take corrective actions / corrections and to either provide evidence requested or to undergo further assessment activities specified by the Assurance Manager. If the applicant does not meet the conditions the Assurance Manager will discontinue the application and the applicant will not be allowed to start performing corresponding assurance or licensing activities as applicable. Discontinued applicants can reapply.

2.4.6.2 Once the applicant advises that conditions have been met and this has been verified the processes (2.4.1-2.4.6) is repeated.

2.4.7 Applicants can appeal against a decision within 30 calendar days after communication of the decision. The appeal will be managed by the Fairtrade International Quality Manager who will review the appeal and present a proposal to the Board for decision.

2.4.8 The Assurance Manager shall update the register of applicants and approved bodies after each decision.

2.5 Initial declaration of conformity of existing LBs and APs

2.5.1 APs and LBs that are already in operation by the time of initial publication of this procedure (July 2015) are considered approved by the Board but shall follow a process to corroborate conformity as follows:

2.5.1.1 The AP or LB submits a completed self-assessment form with copies of all documents required by the self-assessment and if necessary, an explanation of how requirements have been met.
2.5.1.2 The self-assessment and evidence is reviewed by the Assurance Manager, conformity gaps identified and a corrective action plan is proposed by the AP or LB for approval.

2.5.2 Applicants may request a variation from the RAPs and/or RLBs (see section 4.6)

2.5.3 Unless variations are accepted, non-conformities shall be closed within timeframes agreed by the Assurance Manager and the applicant.

2.5.4 Non-conformities are closed by presenting to the Assurance Manager the evidence of effective implementation of the agreed corrective actions.

2.5.5 Once all non-conformities have been closed or the deadline for it has expired the Assurance Manager shall make

- A recommendation for declaration of conformity, or

- A recommendation that conformity is not declared.

2.5.6 The Assurance Manager shall present the self-assessment together with a substantiated recommendation paper to the OC for decision.

2.5.7 The OC members shall review the paper and make comments either supporting or disagreeing with the recommendation presented by the Assurance Manager.

2.5.8 The OC members shall document the reasons why the recommendation is supported or not.

2.5.9 If the majority of OC members recommend that conformity is declared the Assurance Manager will communicate this to the AP or LB.

2.5.10 If the majority of OC members recommend that conformity is not declared:

2.5.10.1 The Assurance Manager shall advise the AP or LB that conformity is not declared and will ask the AP or LB to take corrective actions / corrections within a given timeline and to provide the evidence requested.

2.5.10.2 Once the AP or LB advises that conditions have been met and this has been verified the processes (2.5.4-2.5.9) is repeated

2.5.10.3 If the AP or LB does not meet the conditions the OC will request to the Board that the approval of the AP or LB is discontinued.

2.5.11 The AP or LB can appeal against a decision within 30 calendar days after communication of the decision. The appeal will be managed by the Fairtrade International Quality Manager who will review the appeal and present a proposal to the Board for decision.

2.5.12 The Assurance Manager shall update the register of applicant and approved bodies after each decision.
3 Regular assessment

3.1 Assessment calendar and record

3.1.1 The Assurance Manager shall maintain an assessment calendar covering a 30 to 36-month period, updated each six months.

3.1.2 The assessment calendar shall set out:

- 3.1.2.1 Which body is due for assessment activity and when;
- 3.1.2.2 The proposed assessment scope, which shall be either all requirements or specific themes agreed with the OC;
- 3.1.2.3 Whether the planned on-site assessment activities will be observed by the Assurance Manager or delegated staff.

3.1.3 Once an assessment has been completed, planned activities shall be updated to take account of requirements for closing non-conformities, and changes in conditions and/or frequency.

3.2 Type of assessments

DESKTOP ASSESSMENTS

Licensing bodies

3.2.1 The desktop assessment shall take a sample of the product and artwork approvals from the last 12 months as defined in Table 1 and review them for correctness: identifying any substantive errors (errors affecting the outcome of the decision).

3.2.2 Should the acceptable number of errors for the relevant sampling plan in Table 1 be exceeded, the licensing body shall be required to provide the Assurance Manager with details of a root cause analysis of the reasons for the errors detected, and proposed corrective and preventive actions:

Table 1: Sample size and acceptable number of errors (reject number)

<table>
<thead>
<tr>
<th>Number of product and artwork approvals per 12 months</th>
<th>Sample size</th>
<th>Acceptable errors</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 – 90</td>
<td>13</td>
<td>1</td>
</tr>
<tr>
<td>91 – 150</td>
<td>20</td>
<td>2</td>
</tr>
<tr>
<td>151 - 280</td>
<td>32</td>
<td>3</td>
</tr>
<tr>
<td>281 - 500</td>
<td>50</td>
<td>5</td>
</tr>
<tr>
<td>501 +</td>
<td>80</td>
<td>7</td>
</tr>
</tbody>
</table>

Note on acceptable Quality Levels (AQLs): These sample sizes result in an AQL of 4%. An AQL of 4% indicates that less than 4% of approvals will be incorrect. A more precise AQL could be calculated depending on sample size and the number of faults detected, but we cannot ever say that there may be no faults even though none have been detected due to sampling limitations.
Assurance providers

3.2.3 The desktop assessment shall take a sample of the completed audit reports and review them for completeness, accuracy and whether non-conformities have been supported by objective evidence.

3.2.4 Should there be errors on the relevant sampling the Assurance Provider shall be required to provide the Assurance Manager with details of a root cause analysis of the reasons for the errors detected, and proposed corrective actions.

ON-SITE ASSESSMENTS

3.2.5 On-site regular assessment, report review and follow up and decision shall follow the process set out for an initial assessment (see sections 2.2 and 2.3).

3.3 Decision after regular assessments

3.3.1 After desk-top regular assessments: the Assurance Manager may recommend an earlier on-site assessment, which needs to be approved by the OC prior to taking effect.

3.3.2 After on site regular assessments: the decision process follows the same steps as for an initial declaration of conformity of existing APs and LBs (see section 2.5), using the external assessment rather than a self-assessment.

3.3.3 If an approval is discontinued the Board of Fairtrade International will define a specific suitable transference process for the affected certified or licensed clients that ensures a smooth transfer so their certified or licensed status is not affected.

3.4 Frequency of assessments of licensing bodies

3.4.1 Licensing bodies shall have a desk-top assessment every two years, in between on-site assessments.

3.4.2 Licensing bodies shall have on-site assessments every four years.

3.4.3 The Assurance Manager may recommend more frequent on-site assessments, which needs to be approved by the OC prior to taking effect.

3.4.4 The OC may require more frequent on-site assessments.

3.5 Frequency of assessments of assurance providers

3.5.1 Assurance providers shall have a desk-top assessment every year, except in the year where an on-site assessment is performed.

3.5.2 Assurance providers shall have on-site assessments every three years.

3.5.3 The Assurance Manager may recommend more frequent on-site assessments, recommendation which needs to be approved by the OC prior to taking effect.
3.5.4 The OC may require more frequent on-site assessments.

4 Appointment of assessors

4.1 Assessor approval

4.1.1 Fairtrade International assessor shall meet the qualification and competency criteria as set out in Table 2.

4.1.1.1 For assurance providers: the assurance provider shall select an assessment body and prepare a request for acceptance of each assessor as meeting the qualification and competency criteria. The recommendation shall be approved by the Assurance Manager.

4.1.2 For licensing bodies: the Assurance Managers appoints an assessor that meets the necessary criteria.

Table 2: Assessor qualification and competency criteria

<table>
<thead>
<tr>
<th>Area</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Language</td>
<td>Shall be able to fluently speak and write English. Shall be able to hold an interview in the language of the assessment.</td>
</tr>
<tr>
<td>Work experience</td>
<td>At least two years working for a certification body or an accreditation body or equivalent experience.</td>
</tr>
<tr>
<td>Auditing or assessment experience</td>
<td>Minimum of two years auditing or 50 audit days or equivalent experience</td>
</tr>
<tr>
<td>Fairtrade system training</td>
<td>Have undertaken training on auditing of relevant Fairtrade standards and licensing requirements provided by Fairtrade International.</td>
</tr>
<tr>
<td>Conflict of interest</td>
<td>Absence of conflict of interest to perform the task.</td>
</tr>
<tr>
<td>Communication</td>
<td>Able to express ideas and concepts clearly. Able to interview individuals from workers to senior management in a way that encourages their confidence and enables them to answer questions. Able to express findings in written reports clearly and concisely.</td>
</tr>
<tr>
<td>Time management</td>
<td>Capable of managing time before and during audits so audit plans are realized.</td>
</tr>
<tr>
<td>Personal attributes</td>
<td>Able to display the attributes of an auditor as set out in ISO 19011.</td>
</tr>
<tr>
<td>Knowledge of Fairtrade</td>
<td>Knowledge of and competence in the application of Fairtrade International requirements for assurance providers and licensing bodies.</td>
</tr>
<tr>
<td>International system</td>
<td></td>
</tr>
</tbody>
</table>

4.1.3 Once approved, assessors shall be placed on a register of approved assessment bodies and assessors.
5 Management of Fairtrade International requirements

5.1 Review

5.1.1 Fairtrade International Requirements for Assurance Providers and Licensing Bodies shall be reviewed each five years, or sooner as agreed by the OC.

5.1.2 The review process is administered by the Assurance Manager and includes a consultation period where input from affected bodies is sought, and a transition period to implemented new or amended requirements.

5.2 Approval of requirements

5.2.1 New versions of the Fairtrade International Requirements for Assurance Providers and Licensing Bodies shall be submitted to the OC for approval.

5.3 Variations to requirements

5.3.1 Assurance providers and licensing bodies may ask for exceptions from the RAPs and RLBs at any time using the template provided in Annex 2.

5.3.2 Upon this request the OC may approve variations to these requirements in writing if:

a) The assurance provider or licensing body can demonstrate to Fairtrade International that the variation meets the requirement’s intent in an equivalent way, and

b) Fairtrade International Standards are met.

6 Allegations, complaints and comments

6.1 Allegations

6.1.1 Any interested party may present an allegation of non-conformity against the RAPs or RLBs.

6.1.1.1 The allegation shall be presented in writing to the Assurance Manager and accompanied by evidence of the claim.

6.1.1.2 The Assurance Manager will review the allegation and its evidence within 30 days decides either to:

a) Accept the allegation, in which case a proposal will be made to the OC to decide on an earlier on-site assessment to the affected assurance provider or licensing body. The complainant will be informed of the steps taken.

b) Dismiss the allegation as outside scope or unsubstantiated, in which case this will be informed to the complainant and reported to the OC for information.
6.2 Complaints

6.2.1 Any interested party may present a complaint against Fairtrade International oversight, assurance and licensing activities.

6.2.1.1 The complaint shall be presented in writing to the Assurance Manager.

6.2.1.2 The Assurance Manager will review the complaint and within 30 days decide:

a) If this complaint corresponds to an assurance provider’s or licensing body’s first instance complaint management process, in which case the complainant will be requested to agree that this complaint is transferred to the relevant assurance provider or licensing body that will handle it according to their respective complaint procedures.

b) If the complaint falls under the terms of reference of the OC (second instance complaint), in which case the Assurance Manager will transfer it to the OC for review, decision and action, and inform the complainant accordingly.

c) If the complaint is against the OC, the Assurance Manager or the oversight scheme as such, in which case it will be transferred to the Fairtrade International Quality Manager for review, decision and action, who will inform the complainant accordingly.

6.3 System improvement comments

6.3.1 Any interested party who wish to comment on Fairtrade International oversight, assurance or licensing requirements and procedures are encouraged to do so by sending an email to assurance@fairtrade.net.

6.3.2 Any interested party who wish to comment on standards may participate in Fairtrade International’s consultation processes, a description of which can be found on Fairtrade International’s website.

-------------------------------- End of procedure --------------------------------
### ANNEX 1

**INFORMATION REQUIREMENTS FOR ASSURANCE PROVIDERS (AP) AND LICENSING BODIES (LB)**

**Initially**  
(APs and LBs already in operation by June 2015)

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AP</strong></td>
<td>Self-assessment against RAPs and corresponding evidence (relevant procedures)</td>
</tr>
<tr>
<td><strong>LB</strong></td>
<td>Self-assessment against RLBs and corresponding evidence (relevant procedures)</td>
</tr>
<tr>
<td><strong>AP/LB</strong></td>
<td>Ownership, organizational structure and constitution.</td>
</tr>
</tbody>
</table>

(APs and LBs starting operations after June 2015)

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AP/LB</strong></td>
<td>Application for approval with corresponding requested documentation</td>
</tr>
<tr>
<td><strong>AP/LB</strong></td>
<td>Initial audit results and corresponding corrective action evidence</td>
</tr>
</tbody>
</table>

**Annually**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AP/LB</strong></td>
<td>Exceptions granted (outside those to be reported to the EC)</td>
</tr>
<tr>
<td><strong>AP</strong></td>
<td>Report from the impartiality committee (if any) or report on impartiality</td>
</tr>
<tr>
<td><strong>AP</strong></td>
<td>KPIs (per type of standard: producer vs trader): Certification staff / client ratio, average audit days, average number of NCs/client, number of suspensions, number of appeals and number of unannounced audits as percentages of number of clients.</td>
</tr>
<tr>
<td><strong>AP</strong></td>
<td>Sample of audit reports</td>
</tr>
</tbody>
</table>

**Every two years**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>LB</strong></td>
<td>Sample of product approvals</td>
</tr>
</tbody>
</table>

**Every three years**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AP</strong></td>
<td>Evidence of compliance with RAPs (including any change to procedures) to the auditor</td>
</tr>
<tr>
<td><strong>AP</strong></td>
<td>Audit report to the OC</td>
</tr>
</tbody>
</table>

**Every four years**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>LB</strong></td>
<td>Evidence of compliance with RAPs (including any change to procedures) to the auditor</td>
</tr>
<tr>
<td><strong>LB</strong></td>
<td>Audit report to the OC</td>
</tr>
</tbody>
</table>

**When changes**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AP/LB</strong></td>
<td>Customer status (certified, suspended, decertified, voluntary decertification // Licensed, not licensed)</td>
</tr>
<tr>
<td><strong>AP/LB</strong></td>
<td>Ownership, organizational structure and constitution.</td>
</tr>
</tbody>
</table>

**When requested by the OC**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AP/LB</strong></td>
<td>Specific data/analysis of a particular topic</td>
</tr>
</tbody>
</table>
# ANNEX 2

## VARIATION REQUEST FORM

### Fairtrade International Variation Request

<table>
<thead>
<tr>
<th>Field</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of variation request</td>
<td>mm/dd/yyyy</td>
</tr>
<tr>
<td>Submitted by assurance provider or licensing body</td>
<td>assurance provider name</td>
</tr>
<tr>
<td>Individual submitting request</td>
<td>The name, telephone number and email address of the person submitting the request</td>
</tr>
<tr>
<td>Number and text of indicator or requirement to be varied</td>
<td>The indicator or requirement, and the full text of the indicator or requirement.</td>
</tr>
<tr>
<td>What is the variation requested?</td>
<td>A description of the variation required</td>
</tr>
<tr>
<td>Why is the variation needed?</td>
<td>What is the justification for this variation? How will the intent of the clause be met? Will the Fairtrade standards still be met?</td>
</tr>
<tr>
<td>Other comments</td>
<td>Any other comments thought to be of value to the Fairtrade International – for example support of the leadership team</td>
</tr>
</tbody>
</table>

### Fairtrade International Response

<table>
<thead>
<tr>
<th>Field</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td></td>
</tr>
<tr>
<td>Authority for response</td>
<td></td>
</tr>
<tr>
<td>Variation approved</td>
<td>Yes  No</td>
</tr>
<tr>
<td>Rationale for decision</td>
<td></td>
</tr>
</tbody>
</table>