



The Equitable Food Initiative Certification Program Summary

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Responsibility for these Requirements

The EFI Standards Committee has responsibility for this document and will periodically review and update it.

Users should verify that they are using the latest copy by checking on the EFI website at:

www.equitablefood.org.

Versions Issued

Version No.	Date	Description of Amendment
v1.0	January 24, 2014	First public-facing version.
v1.1	June 30, 2014	Key updates to the role of the Leadership Team and timing and scope of the audit. Clarifications added to what the scope of an EFI certification is and how that scope is set and adjusted.
v1.2	July 1, 2015	Adjustments to the timeline of the auditing process for consistency with the EFI Certification Requirements. Ability for certain audit reports to be submitted in Spanish.
v1.3	November 20 th , 2017	The branding of the document updated to meet current EFI requirements. The document name was changed to “EFI Certification Program Summary”. “About EFI” preamble revised. Copy edits made to improve the clarity of the document. The validity date of a certificate is pegged to the certification date instead of the audit date. The prohibition against extending a certificate has been removed and a new policy has been defined. Verification and Re-certification audits are now announced.

Version No.	Date	Description of Amendment
		Clarified required sections of the EFI Standards, Guidance, and Interpretations.
v2.0	November 30 th , 2018	Corrective action processes are now timebound. Verification audit indicator selection has been revised.
		Copy edits made to improve the clarity of the document.
v2.1	December 1 st , 2020	Notice of audit requirements changed to include additional unannounced auditing. References added for two additional normative documents: <i>EFI Certification Statuses</i> and <i>EFI Complaints Process</i>

About the Equitable Food Initiative (EFI)

EFI is a non-profit skill-building and certification organization that brings growers, farmworkers, retailers, and consumers together to create a safer, more equitable food system. This unique approach sets standards for labor practices, food safety and pest management while engaging workers at all levels to address issues and challenges in the produce industry.

Our Mission Statement

To bring together growers, farmworkers, retailers and consumers to transform agriculture and the lives of farmworkers.

We Believe:

- That being a farmworker is a valuable and honorable profession.
- The skills and contributions of farmworkers create a healthier work environment and produce safer food.
- The future of agriculture lies within the collaboration among growers, farmworkers, retailers and consumers.
- By transforming agriculture, we will transform lives.

Introduction

The purposes of the EFI Certification Program Summary [this document] are:

1. To provide growers and certification bodies (CBs) with a description of the certification program requirements that directly affect growers;
2. To describe the requirements for those in the supply chain handling EFI-certified product that wish to make a claim about the EFI-certified status of that product; and
3. To provide transparency so the EFI certification program has credibility with stakeholders.

This document contains administrative requirements that growers will need to conform to in addition to the performance requirements specified in the EFI Standards.

CBs should read this document in conjunction with EFI Certification Program Requirements, which further details requirements for CBs.

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1 Scope

This document covers the requirements of the EFI certification program that have direct impact on growers, and information that growers require to place the EFI certification program in context.

2 EFI Certification Requirements for Growers

2.1 Covered Farmworkers

- 2.1.1 All farmworkers that provide services to the product to be certified shall be considered to be included within the scope of an EFI audit regardless of whether they are directly employed by the grower or other entities such as Farm Labor Contractors (FLCs) and/or staffing agencies.

2.2 Scope of Certification

- 2.2.1 Prior to Leadership Team training, EFI will undertake a Grower Mapping exercise in coordination with the grower to define the scope of EFI certification.
 - 2.2.1.1 Grower Mapping is a process where key information about an operation is documented and submitted by the grower to inform:
 - 2.2.1.1.1 The scope of an audit and certification; and
 - 2.2.1.1.2 Audit planning.
- 2.2.2 All farmworkers employed by the grower, whether directly or indirectly, at a location that is seeking or has obtained certification are covered by the EFI Standards.
- 2.2.3 The EFI certificate applies to all farmworkers and management systems at locations that are seeking, or that have obtained, EFI certification and to the crops produced at these locations that are identified by the Grower Mapping document as being in-scope.
- 2.2.4 In-scope crops that are not available to be audited at the time of the initial audit may be added to a certification in accordance with the EFI Scope Adjustment Policy available on the EFI website.

2.3 Training

- 2.3.1 Growers seeking certification to the EFI Standards shall engage directly with the Workforce Development Team of EFI on the formation and training of a Leadership Team, and other training needs and requirements.

2.4 Declaration of Audit Readiness

- 2.4.1 When the grower, in consultation with the Leadership Team, concludes that the farm, and the farm's subcontractors (such as FLCs) that are included in an audit, are in conformity with the EFI Standards, they shall conduct an internal audit of conformity using the EFI Audit Report Template.
- 2.4.2 If nonconformity is found in this internal audit, the grower, in consultation with the Leadership Team, shall ensure that corrective action is undertaken to address all identified nonconformities, and shall verify that the corrective actions taken are effective.
- 2.4.3 Once satisfied that the farm is in conformity with the EFI Standards, the grower, in consultation with the Leadership Team, shall make a Declaration of Audit Readiness to their preferred and accredited CB.
- 2.4.4 A Declaration of Audit Readiness and an updated Grower Mapping document shall also be provided to the CB prior to Verification and Re-certification audits.

2.5 Eligibility for Certification

- 2.5.1 A grower is eligible for EFI certification if it meets the following criteria:
 - 2.5.1.1 Has been provided an approved scope of certification by EFI through the Grower Mapping process;
 - 2.5.1.2 Has signed a contract for certification with a CB that is accredited to provide EFI auditing and certification services; and
 - 2.5.1.3 Has documents and records required for an EFI audit available dating back, at a minimum, to the date of the formation of the Leadership Team.
- 2.5.2 All growers will have included in the scope for certification:
 - 2.5.2.1 Social Standards, Guidance, and Interpretations;
 - 2.5.2.2 Food Safety Standards, Guidance, and Interpretations; and
 - 2.5.2.3 Pest Management Standards, Guidance, and Interpretations.
- 2.5.3 An on-site processing and/or packing facility shall be included in the scope for both the EFI Standards and the EFI Processing & Packing Facility Standards if the operation:

- 2.5.3.1 Is located on or near the farm such that workers in the packing facility can practically participate in the Leadership Team;
- 2.5.3.2 The records required to audit the processing and/or packing facility are available in the same location as the records for the growing operation;
- 2.5.3.3 It is owned by the business that operates the farm or an affiliated business, such as a subsidiary or parent corporation; and
- 2.5.3.4 It employs workers who are ultimately employed, managed, (including through human resources procedures) or supervised by the grower (even if there is an intermediary such as a subsidiary corporation or a labor contractor).

2.6 Timing and Intensity of Audits

- 2.6.1 A grower may commence the certification process following:
 - 2.6.1.1 Submission of a Declaration of Audit Readiness to their CB; and
 - 2.6.1.2 Acceptance of its application for certification by an EFI-accredited CB or a CB that has applied for EFI accreditation.
- 2.6.2 Certificates shall have a three-year validity from the date of the initial certification, subject to continuing satisfactory performance.

2.7 Initial Audit and Certification

- 2.7.1 An initial audit, verifying conformity with every indicator in the three sections of the Standards, Guidance, and Interpretations (Social, Food Safety, and Pest Management), shall occur during one of the three months when the greatest numbers of farmworkers are on-site (“Peak Operations”).
- 2.7.2 The CB shall provide a draft of the audit report to EFI within 10 business days of the closing meeting. EFI may provide comments to the CB during a five-business day period after receiving the draft audit report. The CB will then have five additional business days to respond to the EFI comments and make, at their discretion, any necessary revisions to the report.
 - 2.7.2.1 In cases where the draft audit report has been submitted in Spanish, the EFI comment period will be 10 business days in order to allow for translation.
- 2.7.3 Upon completion of the audit report review process, the CB shall submit to the grower the final version of audit report no later than 20 business days following the audit’s closing meeting.

- 2.7.4 The CB, in accordance with the Certification Decision and Issuance of Certificates section of the EFI Certification Program Requirements, shall make and communicate a certification decision.

2.8 Verification Audits

- 2.8.1 There shall be two annual, on-site verification audits at a time when at least 60% of the expected maximum workforce is on-site and roughly around the anniversary of the certificate date.
- 2.8.2 The verification audit shall verify conformity with the Food Safety Standards, all Critical indicators found in the Social and Pest Management Standards, all Worker Involvement indicators found in the Social and Pest Management Standards, 30 Major and/or Minor indicators chosen by EFI, and all nonconformities identified during previous audits in the current certification cycle. EFI may add further indicators at its discretion.

2.9 Re-certification audit

- 2.9.1 Prior to the end of the three-year certification cycle, the CB shall undertake a full audit of conformity at such a time to allow sufficient time to issue a new certificate prior to the expiry of the old certificate.
- 2.9.2 When, for purposes of meeting Section 2.7.1, there is not a minimum of 120 days between the audit date and the expiration of a current certificate, the current certificate may be extended at the discretion of EFI.
- 2.9.2.1 The following criteria must be met to allow a certificate to be extended:
- 2.9.2.1.1 The re-certification audit has been completed
 - 2.9.2.1.2 The audit date was set in order to meet the peak operations requirement in Section 2.7.1.
 - 2.9.2.1.3 EFI does not find evidence in the draft re-certification audit report that would warrant recommending that the CB consider exercising Section 2.13.3.

2.10 Notice of Audit

- 2.10.1 For the Initial audit, the CB shall determine the audit dates in coordination with the grower.
- 2.10.2 Recertification audits and the first verification audit within each certification cycle shall be scheduled in coordination with the grower and following the criteria

outlined in Sections 2.8.1 and 2.9.1. The dates shall be announced to the grower.

2.10.3 The second verification audit within each certification cycle shall be unannounced.

2.10.3.1 The CB shall provide to the grower a four-week period in which the second verification audit will take place in conformance with Section 2.8.1 and at least ninety days before the first potential audit date.

2.10.3.2 Up until sixty days before the first potential audit date, the grower may communicate to the CB blacked-out dates when the LT will not be available to participate in the audit. Blacked-out dates must allow for at least three contiguous weekdays in at least three of the four weeks be available for the audit.

2.10.3.3 In order to facilitate the convening of the LT, the CB shall communicate the audit starting date and time 48 hours ahead of the start time.

2.10.4 A CB may elect to carry out a short-notice or unannounced audit at any time, or EFI may instruct them to do so.

2.10.4.1 Short-notice audits shall have a maximum of 48 hours' notice.

2.10.4.2 Unannounced audits will have no prior notice.

2.10.4.3 When requested to undertake a short-notice or unannounced audit by EFI, the CB shall do so within the timeframes agreed between the CB and EFI at the time of the request.

2.11 Opening and Closing Meetings

2.11.1 The Leadership Team or their designees shall be present for the audit opening and closing meetings.

2.11.2 Attendees at the opening and closing meetings shall be documented by the CB.

2.12 Nonconformities

2.12.1 When the CB detects nonconformity against the EFI Standards it shall include a corrective action request (CAR) in the audit report which shall direct the grower, in consultation with the Leadership Team, to take corrective action.

2.12.2 For all nonconformities raised by the CB, the following actions shall be taken:

- 2.12.2.1 The grower shall investigate the root cause of the nonconformity and develop a corrective action plan (CAP).
 - 2.12.2.2 The grower shall submit to the CB, within four weeks of the delivery of the final audit report, a CAP which identifies the actions and the timeframes for implementation.
 - 2.12.2.3 Within five business days, the CB shall review the CAP and respond to the grower.
 - 2.12.2.4 The grower, in consultation with the Leadership Team, shall implement CB-reviewed CAPs and verify their effectiveness.
 - 2.12.2.5 The grower shall notify the CB that the corrective action has been implemented and effective and request verification.
 - 2.12.2.6 All corrective action plans shall be verified as implemented and effective within three months of the grower receiving the final audit report.
 - 2.12.2.7 If the nature of a corrective action is such that it cannot be satisfactorily closed in three months, the CB can petition EFI in writing for additional time.
 - 2.12.2.8 If the nonconformity remains open after three months, or the time agreed to in writing by EFI, the CB shall decline to certify the grower. In the case of a verification or re-certification audit, the CB shall suspend the certificate.
 - 2.12.2.9 Corrective actions for nonconformances that trigger the *EFI Additional Diligence Protocols* shall be implemented on a timeline determined by EFI's Executive Director. It can be expected that the serious nature of the triggering conditions will require immediate remedy.
- 2.12.3 The CB shall verify the corrective actions as implemented and effective through a desk review or on-site visit within four weeks of the grower providing notice.
 - 2.12.4 Once the CB verifies the corrective actions are implemented and effective, the nonconformity shall be closed.

2.13 Review, Suspension, or Revocation of a Certification

- 2.13.1 A CB may suspend or revoke a certificate for a contractual or administrative reason.

- 2.13.2 A CB shall deny or suspend a certificate as a result of a nonconformity that is not closed within the time frame allowed.
- 2.13.3 A CB shall review, suspend, or revoke a certificate upon finding flagrant nonconformities with the Standards or other EFI certification program requirements that represent unacceptable risk to farmworkers, consumers, and/or the goodwill of EFI or the CB as determined by those parties.
- 2.13.4 A grower whose certificate is suspended or revoked, shall:
 - 2.13.4.1 Immediately stop making any claims of certification and shall not use the EFI label;
 - 2.13.4.2 Within 24 hours, inform their customers whose purchase specifications include a requirement that products are EFI certified that their certificate has been suspended or withdrawn;
 - 2.13.4.3 Immediately prevent any nonconforming product bearing the EFI label from entering the supply chain;
 - 2.13.4.4 Investigate to determine if nonconforming product may already be in the supply chain, and if so, consider if a recall is required for health and safety reasons; and
 - 2.13.4.5 Inform the CB and EFI of the nonconforming product in the market and steps taken to reduce, eliminate, or recall nonconforming product bearing the EFI label.
- 2.13.5 Additional details about the six different statuses that can be applied to a certification can be found in *EFI Certification Statuses* document available on the EFI website.

2.14 Requests for Interpretations, Complaints, and Appeals

- 2.14.1 Growers that seek interpretation of any of EFI's requirements should ask their CB for explanation.
- 2.14.2 Growers that are dissatisfied with the performance of their CB should complain directly to the CB, which shall have procedures to deal with complaints.
- 2.14.3 If a grower is dissatisfied with the CB's response to their complaint, the grower may forward a lodge a formal complaint with EFI using the *EFI Complaints Process* available on the EFI website.

2.15 Changes Affecting Certification

- 2.15.1 EFI will periodically issue revisions to EFI documents, including the EFI Standards and EFI Certification Program.
 - 2.15.1.1 Changes to documents will be identified.
 - 2.15.1.2 The time frame for growers to conform to and be audited against the revised standard or requirement will be specified.
 - 2.15.1.3 Revised documents supersede previous versions unless otherwise specified.
 - 2.15.1.4 EFI is not liable for any costs or loss of certification arising out of changes to the EFI Certification Program.
- 2.15.2 All of EFI's documents are identified with a date and version number, and users should ensure they are using the latest version, which can be found on EFI's website.

2.16 Publicly Available Information

- 2.16.1 EFI shall make publicly available the following information about certificate holders:
 - 2.16.1.1 Name, address, and contact details (telephone, email, and website);
 - 2.16.1.2 The scope of certification, including the location of farming operations;
 - 2.16.1.3 The dates of certificate issue and expiration; and
 - 2.16.1.4 Details of any suspensions, revocations, or withdrawals.
- 2.16.2 CBs shall make a range of information publicly available on their websites, including:
 - 2.16.2.1 Name of the certificate holders, address, and contact details (telephone, email, and website);
 - 2.16.2.2 The scope of certification, including the location of farming operations;
 - 2.16.2.3 The dates of certificate issue and expiration; and
 - 2.16.2.4 Details of any suspensions, revocations or withdrawals.

2.17 Language

- 2.17.1 The official language of EFI is English.

2.17.1.1 Translations of some documents are provided. If there are any differences between the English and other language versions, the English language version shall prevail.

2.17.1.2 All EFI licenses and EFI agreements shall be executed in English, and in case of dispute, the dispute will be heard in English.

2.17.2 Audit reports shall be completed in English and, at the request of the grower, also in Spanish.

2.17.3 A summary of nonconformities shall be provided by the CB to the grower and the Leadership Team in English and, in cases where the Grower Mapping document shows Spanish to be widely in-use, also in Spanish.

2.18 Use of the EFI Label and Trade Name

2.18.1 Once certified and after entering into a certification program participation agreement to use the EFI label and trade name, growers may use the EFI label and trade name in conformity with the EFI Branding Guidelines and valid certification program participation agreement.

2.19 Traceability Data Provision

2.19.1 When requested by EFI, growers shall supply traceability data within 24 hours to enable EFI to trace and track products bearing the EFI label through the supply chain.