

Protected Harvest

Certification Manual

Version 2.0, July 2019

Sustainable Citrus Certification



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I. Introduction

Welcome to the Protected Harvest Sustainable Citrus Certification program! Protected Harvest welcomes new growers joining the program. This manual aims to explain the certification process.

I.a. About Protected Harvest

Protected Harvest is a 501(c)(3) nonprofit organization in Santa Cruz, California, with the principal mission to advance adoption of quantifiable sustainable agriculture standards. Protected Harvest functions first and foremost as an independent certifier. In addition, Protected Harvest also takes on projects to review standard development processes to provide third-party validation and confirm they are based on sound science and designed to promote continuous improvement. The Protected Harvest Board of Directors is comprised of a diverse group of representatives from prominent environmental NGOs, agricultural experts, scientists, and marketing experts. While the staff carries out daily operations to manage the auditing and certification process, the Board of Directors provides organizational oversight on an ongoing basis.

For more information about Protected Harvest, visit protectedharvest.org.

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850 Front Street, #7189
Santa Cruz, CA 95060
831.706.2097
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I.b. About the Sustainable Citrus Certification

The Protected Harvest Sustainable California Oranges and Mandarins Standard was first developed by Protected Harvest in 2008.

A revision process for the Sustainable California Oranges and Mandarins Standard was initiated in 2019 to create Version 2.0. The revised Standard is now named the Protected Harvest Sustainable Citrus Standard V.2.0. The revision of the Standard was informed by the following objectives:

1. Update the Standard to reflect most recent science and best practices in agricultural production; and,
2. Expand the scope of the Standard to include social responsibility and energy management criteria and additional criteria in existing chapters.

Highlights of revisions and updates include:

- Updating of criteria throughout to reflect currently recognized best management practices;
- Addition of Social Responsibility and Energy Management chapters;
- Revision of criteria text to make the language and answer choices more straightforward;
- Reorganization of criteria, criteria numbering, and chapters to clarify Standard organization and flow; and,
- Addition of straightforward Audit Requirements to the Standard. Previously, resources and information to support growers in achieving the certification was contained in a separate Companion Document.

I.c. The Third-party Auditor

Protected Harvest is **Standard Owner** and the **Independent Certifier** of the Sustainable Citrus Standard. Protected Harvest is responsible for updating and maintaining the Standard. It also reviews audit reports and corrective actions, and issues final certification decisions.

All audits are performed by an independent **Third-Party Auditor**, who is qualified to do sustainable agriculture auditing of farm records, perform site visits, and issue an audit report of an applicant's compliance with the Sustainable Citrus Standard and certification requirements. All auditors hired by the auditing agency must have the following of the following credentials:

- Bachelor's degree in Agricultural Science *and* 2 years agricultural inspection experience; or,
- A minimum of 5 years agricultural inspection experience; AND,
- Successful completion of training in the Sustainable Citrus Certification Program approved by Protected Harvest.

All auditors must also disclose that there is no conflict of interest with any applicant. Auditors are required to sign a confidentiality agreement annually to protect confidential information disclosed during the evaluation.

Protected Harvest has contracted Muser Consulting to conduct audits against the Sustainable Citrus Standard. Muser Consulting is responsible for record review, scheduling, and conducting onsite audits.

Third-Party Auditor Contact:

Muser Consulting
679 Canyon Creek Way
Galt, CA 95632
muserconsulting@gmail.com
209-810-1966

II. The Sustainable Citrus Certification Program

II.a. Applicability of the Sustainable Citrus Standard

The Standard is applicable to orange and mandarin producing operations in California, and applies only to production facilities, not handling or processing facilities.

II.b. The Standard

The Standard contains a total of 152 Criteria plus three Bonus Criteria. Bonus Criteria are criteria that award extra points if practices are implemented, but these points are not included in the total pool of possible points, allowing applicants to earn extra points toward their total earned. Criteria are organized into ten chapters. Each criterion is listed in the Standard with its name, full text, points value, and audit requirements. Audit requirements include the specific type of documentation or visual observation that the auditor will require to verify compliance with the individual criteria.

To achieve certification, an applicant must achieve at least 50% of the available points in each chapter as well as 70% or more of available points in all chapters combined. Certified operations must also not exceed a maximum number of pesticide impact points calculated using the pesticide Environmental Assessment System (PEAS, see below).

II.c. PEAS (Pesticide Environmental Assessment System)

The Pesticide Environmental Assessment System is a model used to quantify the environmental and human impact of the active ingredients of pesticides available for use on a crop. Using PEAS, numbers are generated for:

- acute risks to farm workers;
- dietary risks from acute and chronic exposure to people who consume the product;
- acute risks to small aquatic invertebrates;
- acute risks to birds; and,
- acute risks to bees and pest natural enemies.

The sum of these five numbers is called the “environmental impact unit” (EIU) score for the active ingredient. A list of current scores for active ingredients can be obtained from Protected Harvest and is provided with the Standard in the application package. The same list applies to both oranges and mandarins for the San Joaquin Valley and adjoining foothills, but not to other crops or locations.

Using a product not found on the list may prevent an applicant from achieving certification. Certified operations should contact Protected Harvest if there is a potential need to use a product that is not found on the current list. If a certified operation plans to use a certain product not on the list, the operation must request the PEAS impact unit early to allow time to get the calculation from our outside resource.

During the year, applicants must list the EIUs for every pesticide application to the grove in a report along with the total EIU sum for that grove. The total score must be kept within the maximum allowed value (see below). The report must cover the 12 months prior to submission of the report. The report is due at the time of inspection. Failure to submit it at this time may delay certification being issued.

There is no required format for the EIU report, however, it must record the following information:

- the date of each application,
- the active ingredient involved,
- the number of acres to which it was applied,
- the environmental impact units for each application, and
- the mean total per acre score across all groves by species and seasonal category.

The maximum Environmental Impact Unit (EIU) accumulation for California oranges or mandarins is 400 per acre.

Please note that in 2020 the Sustainable Citrus Certification Program will no longer use PEAS but will be converting to the Pesticide Risk Tool (PRT)¹ developed by the IPM Institute.

III. Getting Certified with Sustainable Citrus

III.a. Application

To apply for certification, write Protected Harvest at certification@protectedharvest.org to request an application form.

The application form is provided in electronic format and can be submitted to certification@protectedharvest.org.

On the certifying fields section of the application, list the groves, blocks or ranches to be certified. Some organizations list blocks separately. Most applicants list whole groves or even lump adjacent groves into “ranches.” The decision is largely up to the applicant. However, the decision should be guided by the concept that each unit listed should have similar management practices. For example, since irrigation type is provided during the self-assessment, the type of irrigation across the whole unit should be the same even if different blocks use separate pumps.

III.b. Application Fees

Once an application is received, an invoice will be sent to the applicant. Payment must be received before a certificate will be issued.

The certification fee for the Protected Harvest Sustainable Citrus Certification consists of the base certification fee and the per-acre fee:

Base certification fee:

- \$3,020 for applicants in their first year of certification
- \$2,400 for renewing applicants

Fee per acre of production being certified: \$2 per acre

III.c. Self-Assessment

After submitting the application and fee payment to Protected Harvest, the next step is to self-assess the practices being implemented on each production block against the Sustainable Citrus Standard V2.0 using the Self-Assessment Platform found at www.citrus.protectedharvest.org. User credentials for the platform are issued once the application is received. A deadline for completing the self-assessment will be provided.

¹ <https://pesticiderisk.org/>

It is highly recommended that the person responsible for completing the self-assessment is present during the onsite audit. Upon logging in, the Self-Assessment Platform will contain a profile of the production blocks listed by the applicant on the application. An assessment will need to be completed for each separate production block, and users can generate a score report for each block assessed. The system includes a timesaving cloning tool for copying answers from production block to production block and from year to year. For support using the Self-Assessment Platform, email certification@protectedharvest.org or call 831-477-7797.

The applicant can generate a certification score report. The auditor uses the self-assessment to organize the audit and identify areas to focus on during the audit process.

III.d. Onsite Audit and Verification of Practices

Sustainable Citrus Certification requires an onsite audit the first year of certification, and every third year thereafter. A desk audit will be performed in years 2 and 3. The onsite audit will include spot checking the production blocks and verifying practices based on the information provided in the self-assessment. Applicants will not be informed in advance of the onsite inspection as to which production blocks have been selected to audit. A farm representative with sufficient knowledge of the certification program must be present during the audit, and available to the auditor. Failure to be at the agreed-upon location at the agreed-upon time may result in additional fees. Additionally, if a second visit is required due to a lack of sufficient documentation at the time of the first visit, further fees will be required. See Appendix A for the schedule of additional fees.

In the years when an on-site visit is not required, applicants will be asked to provide required documentation to the auditor. The auditor will inform applicants which documents are needed and the specific production blocks they are to represent (unless they are relevant to the whole farm), and the date they are due.

If an applicant feels that the auditor assigned by Protected Harvest has a conflict of interest or any other issue that would prevent an adequate evaluation, the applicant should contact the Protected Harvest program for assistance. A different auditor will be assigned if necessary.

Applicants are requested to respond promptly to communications from the auditor. If the auditor does not receive a response after three attempts, it will be assumed the applicant is no longer interested in certification and their production blocks may be failed without refund of fees. If the applicant resumes communication and does wish to continue with certification, additional fees may be charged due to the additional auditor time required (see Appendix A: Additional Fee Schedule).

III.e. Audit Requirements

To prepare for the audit, program participants should refer to the Sustainable Citrus Standard Version 2.0, in which audit requirements are listed for each Practice. Audit requirements include documentation of practices in the form of paper records, electronic records, purchase receipts, and/or photographs. It is highly recommended that applicants compile all listed documentation before their scheduled audit. Some practices will be verified during visual inspection or observation as noted in the Standard. The auditor also reserves the right to verify practices by interviewing employees at the operation.

Pesticide records will always be requested by the auditor to verify compliance with the PEAS requirement (see Section II.a. above). In some blocks or groves, the final pesticide application will not have been made at the time of the audit. For this reason, the certificate issued from Protected Harvest may be a “conditional certificate.” The conditional certificate is contingent on the final pesticide records demonstrating

compliance when submitted. The certificate can be revoked at any time if the certified production unit is found to be out of compliance.

III.f. Corrective Actions

The auditor will verbally communicate to the person in charge of the audit at the operation any discrepancies, missing documentation, and corrective actions required to achieve certification. After the audit, the auditor will prepare an Audit Report that Protected Harvest will send to the applicant within five days of the onsite audit. The applicant has 30 days to carry out all corrective actions listed in the Audit Report.

III.g. Certification Decisions

Upon submitting evidence of all corrective actions to Protected Harvest, Protected Harvest will review and follow up if more information is needed. . Once all Corrective Actions have been shown to be sufficiently addressed, Protected Harvest will issue a Corrective Actions Report listing all closed corrective actions. Once all corrective actions are closed and the applicant has satisfied all requirements for certification, Protected Harvest will issue a certificate. The certificate will be issued in electronic form only. The certificate is valid for the crop produced during the season for which it was issued only.

III.h. Failure to Achieve Certification

If an applicant fails to comply with any certification requirements including the Standard, Do Not Use List and Pesticide Limited Use Policy, or documentation requirements, Protected Harvest will inform the entity of this status and the primary cause for the failure, as well as necessary actions to be able to achieve certification. The decision to grant certification is based solely on the entity's compliance with certification requirements.

III.i. Suspension

Once certified, certified entities are obliged to remain in compliance by maintaining the operational practices shown during the evaluation. If at any time Protected Harvest discovers that practices have changed in such a way that a compliant score can no longer be achieved, certification may be suspended. During suspension, product may not be represented as certified.

If the applicant performs corrective actions and returns to a level of compliance, the certification may be reinstated. If no corrective actions are taken before the end of the certificate term, the certification expires.

III.j. Revocation

If it is determined that a certified entity is not operating in the manner observed during the certification audit, the certification may be revoked.

If the auditor determines that a certified entity, their consultant(s), or employee(s) willfully provide untrue information during the inspection and certification evaluation, this is grounds for revocation from the program and loss of eligibility for certification for three years.

If the operation is found to be fraudulent and not in compliance with the terms of the Grower Affidavit found in the application form, possible civil action may be taken.

III.k. Appeals and Disputes

If an applicant feels that a certification decision was made without adequate information or based on erroneous data, they are permitted to appeal the decision. The appeal must be filed with Protected Harvest within 30 days of the decision and must include:

- Name of the applicant and person submitting the appeal. No anonymous appeals will be accepted. The name of the applicant, address, phone number, and name and title of person submitting the appeal must be included;
- A copy of the certification decision being appealing;
- Any information and supporting documentation that confirms the claim; and,
- A summary of applicant's position in 100 words or less.

Once the appeal is received by Protected Harvest, the decision will be reevaluated. The applicant will be notified of the results of the reevaluation within 30 days of submission of the appeal.

If the decision is upheld and the applicant feels it is within compliance of the Standard, a dispute may be filed with Protected Harvest. The dispute should include all the information previously provided in the appeal. The Protected Harvest Board of Directors will review the appeal and the original decision and rule on the issue. The applicant will be notified within 30 days of submission of the dispute of the decision of the Board.

III.l. Voluntary Withdrawal

At any time during the application process, an applicant may voluntarily opt to withdraw their application. A partial refund may be available to certifying entities that are withdrawing as follows:

- Complete withdrawal prior to online self-assessment: Full refund of payment.
- Complete withdrawal after self-assessment up to 5 business days prior to the scheduled onsite audit: Refund of payment minus \$500.
- Partial withdrawal (individual production block) before or during onsite audit: 75% of the withdrawing incremental acreage assessment is refundable.
- Complete or partial withdrawal after onsite audit: No refund is available.

III.m. Complaints Investigation

Any individual with credible information may file a complaint with Protected Harvest against a certified operation that is not operating within the requirements of the Standard. All complaints must be signed and submitted with a return address. The complaints must clearly describe the area of non-compliance. Any support for the complaint must be provided.

Protected Harvest staff will investigate the complaint thoroughly. The name of the individual making the complaint will remain confidential. The investigation may include an unannounced visit to the operation. A response is sent to the individual making the complaint upon completion of the investigation.

III.n. Federal, State and Local Laws

Applicants must meet all legal requirements pertaining to their operation. These may include, but are not limited to, record keeping, food safety, labor management, employee safety, and nutrient management. Any legal requirement that exceeds the requirements of the Standard supersedes this program's authority.

III.o. Confidentiality

Protected Harvest and its contracted third-party auditors agree that information collected during the certification process is to be considered confidential and proprietary to the applicant and 1) shall hold the same in confidence, 2) shall not use the individual grower information other than for the purposes of its certification business, and 3) shall disclose it only to its officers, directors, or employees with a specific need to know.

IV. Use of Certification

Once certification is granted, the certified entity may represent products that are included in the scope of the certification as certified, as per program guidelines. The certified entity may also communicate publicly regarding its certification status.

IV.a. Handler Certification

All packing houses using the Protected Harvest label and/or other references to the certification program on displays or other marketing materials must use robust traceability procedures to track product back to certified groves. For this reason, all grower applicants are asked on their application to provide the names of all packing houses that are expected to receive fruit from the groves being certified.

IV.b. Representation of Certified Products

Participation in the Protected Harvest Sustainable Citrus Certification program entitles the producer or manufacturer to make a claim about the way in which its products or the ingredients in its products are grown. Both the Protected Harvest program and the producer or manufacturer of the products may make a marketing claim to the consumer of the products or to the retail purchaser of the products. The producer or manufacturer is not authorized to make any claims beyond those that the Standard to which the products or the ingredients of products are certified are designed to address.

IV.b. Use of the Protected Harvest Seal

Producers or manufacturers who are certified under the Protected Harvest Sustainable Citrus Certification program may affix the Protected Harvest seal to their products at the distribution or retail level. Language like the following should be used to explain the use of the seal: "This product was produced using a set of environmentally friendly practices that are approved and certified by Protected Harvest. See protectedharvest.org for more information." The seal may be displayed in consumer marketing materials, as well as on the website of the producer or manufacturer.

V. Amending the Standard

V.a. Submit Proposed Revisions

Proposed revisions to the Protected Harvest Sustainable Citrus Standard may be submitted to certification@protectedharvest.org. The person submitting proposed revisions must be identified by name. Anonymous proposals will not be accepted. If submitted on behalf of an organization or company, the name of the organization or company, address, phone number, number of members, and name and title of person submitting proposed revisions must be included. For proposed revisions, please include the following items:

- List the Standard, section number, question number, and actual text that is proposed to be changed.
- Provide the proposed replacement language. New text should be in underline format, and deleted text should be indicated by strike-out format.
- Provide a rationale, including the need for and intended effect of the proposed change. Supply any supporting documents or research information, including historical use.
- Include a summary of the position in 100 words or less.

V.b. Consideration of Revisions

Revisions represent substantive changes or additions to the Standard that may affect the ability of an operation to comply. Revisions can include additional requirements, changes to the allowance of practices, or adjustments to the scoring of a certification audit.

By contrast, technical corrections are changes that do not change the intent of the Standard. These include grammar and spelling corrections or adjustments to terminology. Technical corrections can be made by Protected Harvest at any time to improve the certification documents. As these do not affect the intent of the Standard, no notice or phase in period is required.

Revisions require a transparent procedure that allows for comment from all stakeholders. It is expected that four distinct facets of industry will provide request for revisions. They are:

- Growers and program participants;
- The auditor;
- Industry groups and consumers; and
- Certification program administrator.

The same procedure will be used, regardless of who submits the request, as follows:

1. Written request for revision submitted to Protected Harvest. Requests must be submitted at least 6 months prior to the application month (generally January).
2. Within 30 days, Protected Harvest will create a recommendation based on the information in the request. This recommendation will be forwarded to the Protected Harvest Board of Directors.
3. The staff and Board will have 30 days to provide comments. Comments may be used to create a revised recommendation.
4. The revised recommendation will be posted for comment on the Protected Harvest website for 30 days. Simultaneously, the industry group is advised of the recommendation.
5. After the posting, within 30 days the recommendation will be revised once again by staff to encompass comments and submitted to the Board of Directors of Protected Harvest for approval.
6. Once approved, the recommendation will be posted on the Protected Harvest website as a notice of change, including the date of implementation. The date of implementation is the date in which program participants will be required to meet the new Standard requirement. Prior to the implementation date, Protected Harvest will adjust documentation effected by the change. In the case of substantial changes, the implementation date may be held off until the following season to allow an exploratory period prior to implementation. Simultaneously, the current and expected certifying entities will be alerted to the imminent change.

Appendix A: Additional Fee Schedule

Applications are processed in batches so that they can be assigned to an auditor based on geographic location and operation size. Late applications, changes to applications, changes to inspection dates, and withdrawal of production blocks may cause additional scheduling and work for inspections and staff and may result in an assessment of additional fees as detailed below.

The following schedule of fees will be billed directly to the applicant for additional administrative expenses, if applicable. The efforts by the applicant to submit materials on time and provide accurate information will greatly improve the efficiency of the certification process and minimize costs.

- Inspection Cancellation (with less than 48 hours' notice): \$100
- Absence at a scheduled inspection (without notice of cancellation): \$200
- Exceptional auditor time required (e.g., grower was unprepared or absent at the scheduled inspection or requires additional time after failing to respond to auditor requests for documentation): \$100/hour
- Add-on production block at inspection: \$50/added production block
- Add-on production block after inspection: \$150/added production block, plus acreage fees
- Replacement Certificate: \$15
- Insufficient Funds Check: \$30 each

Appendix B: Definitions

Applicant: The company/growing operation seeking to certify its practices against the Sustainable Citrus Standard.

Audit: The onsite inspection of the applicant's facilities and documentation to verify practices.

Audit Requirement: Specific types of documentation or visual observation that the auditor will require to verify compliance with the individual criteria. Audit Requirements are listed for each individual Criterion in the Standard.

Auditor: The person retained to conduct inspections of applicant's operations.

Certifier: The third-party entity responsible for the certification process and ensuring the rigor of the applicability of the Standard. In the case of the Sustainable Citrus Certification, Protected Harvest is the Certifier.

Criterion: An individual practice that is required by the certification. Criteria are organized into ten Chapters within the Standard. Each Criterion has a corresponding point value.

Onsite Audit vs. Desk Audit: Onsite audits occur on the first year of certification and on every third year thereafter (i.e. Year 1 and Year 4). The auditor also randomly selects certified operations for a surprise onsite audit every year, and these surprise audits occur on years designated for Desk Audits. Desk Audits occur on years 2 and 3 of every three-year certification cycle.

Production Block: Also Block, Ranch, Grove in this document. Refers to the unit of land being assessed for audited for certification, that has uniform production practices and so can be treated as a discrete unit for certification.

Standard: The collective body of required practices to achieve certification.

Standard Owner: The entity that effectively owns the Standard and is responsible for its maintenance and improvement. In the case of the Sustainable Citrus Standard, Protected Harvest is the Standard Owner.