SYSTEM REGULATIONS

Version 4.0
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## Abbreviations

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<tr>
<td>AU</td>
<td>Annual Update</td>
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<tr>
<td>BP</td>
<td>Business Partner</td>
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<td>BPM</td>
<td>Business Partner Map</td>
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<td>CB</td>
<td>Certification Body</td>
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<td>FB</td>
<td>Final Buyer</td>
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<td>GCP</td>
<td>Global Coffee Platform</td>
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<td>GHG</td>
<td>Greenhouse Gas</td>
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<td>GRAS</td>
<td>Global Risk Assessment Services</td>
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<td>IB</td>
<td>Intermediary Buyer</td>
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<td>IMS</td>
<td>Internal Management System</td>
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<td>IP</td>
<td>Improvement Plan</td>
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<td>ME</td>
<td>Managing Entity</td>
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<td>QMS</td>
<td>Quality Management System</td>
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<td>ToU CB</td>
<td>Terms of Use for Certification Bodies</td>
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<td>ToU IB</td>
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<td>ToU ME</td>
<td>Terms of Use for Managing Entities</td>
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1 Introduction

4C (The Common Code for the Coffee Community) is an independent third-party certification system for the sustainable cultivation, processing and trading of coffee. The aim of 4C is to anchor sustainability in the coffee sector. Independent third-party audits ensure compliance with economic, social and environmental criteria for coffee production and processing to establish credible and traceable sustainable coffee supply chains.

4C’s sustainability principles are set out in the 4C Code of Conduct, which was developed in a comprehensive and transparent multi-stakeholder process involving coffee producers, trade and industry, as well as various civil society organizations from around the world. In 2007 the 4C Code of Conduct was implemented and in 2014 it was revised in another extensive multi-stakeholder process. The focus of the 4C Code of Conduct is sustainable agricultural production of coffee and its post-harvest activities, including the environmental, social and economic dimensions. Certified are so-called "4C Units", which consist of coffee producers, traders and processing operations and cover all elements of the supply chain from the cultivation of the coffee to the green coffee bean.

The 4C standard ensures that coffee cultivation is not contributing to deforestation or reduction of biodiversity, that good agricultural practices and the protection of soil, water and air is applied, that human, labour and land rights are respected and that farmers are sufficiently trained to increase productivity and profitability. 4C pursues an inclusive approach, which is intended to enable coffee producers to enter certification in order to achieve a real impact on the ground in a continuous improvement process.

Remote sensing-based technologies help 4C and its auditors to conduct risk assessments and verify land use change. 4C also allows the measurement of the carbon footprint of coffee. Traceability in the 4C Unit is ensured. Tracing the physical flow of coffee throughout entire supply chains is possible through mandatory reporting of traded 4C certified coffee. Chain of Custody certification for Intermediary and Final Buyers is possible on a voluntary basis.

Initially, 4C was owned and operationalized by the 4C Association. As of April 2016, the 4C Association evolved into the Global Coffee Platform (GCP), continuing to own and periodically revise the Baseline Common Code as a global baseline reference for principles and practices that serve to pave the way in the understanding and implementation of sustainability in coffee production and processing. The 4C Code of Conduct is the operationalized and verifiable version of the GCP’s Baseline Common Code against which compliance can be demonstrated through the 4C System and 4C certificates issued. As of April 2016, Coffee Assurance Services (CAS) GmbH & Co. KG took responsibility to assure compliance against the 4C Code of Conduct through operating the 4C System. In 2018 CAS was renamed to 4C Services GmbH. 4C remains an active member of GCP and will continue to use the GCP Baseline Common...
Code as a basis for the certification in the 4C System. 4C will also contribute to revisions of the GCP Baseline Common Code as they are carried out.

4C operates the 4C Integrity Program, which comprises integrity audits conducted by 4C integrity auditors to continuously monitor the performance of the 4C System users and Certification Bodies (CBs) cooperating with 4C to ensure and maintain the high-quality standard and credibility of 4C. Further information on the 4C Integrity Program is provided in chapter 3.9.

The scope of the 4C System Regulations are described in chapter 2. Chapter 3 on “Governance” lays down the general principles according to which the 4C System is governed. Chapter 4 on “System Basics” describes the key features of the 4C Code of Conduct, names relevant participants of the 4C System and provides insights into the setting up of 4C Units. Chapter 5 on “Certification Process” provides a step-by-step overview of the 4C application and certification process. Chapter 6 on “Audit Process and Requirements” covers different types of audits and requirements on how 4C audits are to be conducted. Chapter 7 on “Risk Management” describes the risk management process and the implications of risks for 4C audits. Chapter 8 on “Traceability” covers requirements for the traceability within and outside the scope of the 4C Unit. Chapter 9 on “Commercial Reporting” points out the requirements, procedures and documents regarding the trading of 4C certified coffee and corresponding reporting. Finally, chapter 10 specifies the requirements on the proper use of the 4C logo and claims on 4C-certified products and other promotional products.
2 Scope

This document describes all relevant aspects and requirements of the 4C System, including general principles according to which the 4C System is governed, its internal structure, the requirements for 4C certification which need to be applied by all participants of the 4C System, including 4C Units as well as CBs cooperating with 4C. Furthermore, the requirements, procedures and documents regarding the trading of 4C certified coffee is covered.

The document aims to inform everyone involved in the 4C System about each party’s roles and responsibilities. These 4C System Regulations are further complemented by the internal Quality Management System (QMS) and its respective procedures.

Table 1 provides an overview of the normative 4C System documents as well as further 4C templates and checklists based on the requirements defined in the 4C System documents, and that are provided by 4C to facilitate the 4C application and certification process.

<table>
<thead>
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<th>4C System documents (normative)</th>
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<tr>
<td><strong>4C Code of Conduct</strong></td>
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<tr>
<td>4C principles and criteria for the production, processing and trading of green coffee beans</td>
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<tr>
<td><strong>4C System Regulations</strong></td>
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<tr>
<td>Relevant aspects and requirements of the 4C System, including general rules according to which the 4C System is governed, its internal structure and the requirements for 4C certification which need to be applied by all participants of the 4C System. Furthermore, requirements regarding the trading of 4C certified coffee and the 4C communication guidelines are described</td>
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<tr>
<td><strong>4C Certification Body Regulations</strong></td>
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<td>Requirements for CBs to become a cooperating CB of 4C, and the duties of CBs to perform certification services according to 4C requirements and the requirements for staff of the CB to be appointed to perform specific tasks relating to 4C certification services.</td>
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<td><strong>4C templates and checklists based on the 4C System documents</strong></td>
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<tr>
<td><strong>4C Audit Checklist</strong></td>
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<td>Audit checklist to be used during 4C audits</td>
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<td><strong>Business Partner Map (BPM)</strong></td>
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<td>Tool for Managing Entities (MEs) to collect the basic required data of its Business Partners (BPs)</td>
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<td><strong>Improvement Plan (IP)</strong></td>
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Plan that includes improvement actions detected during an audit of a 4C Unit

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<th>4C contractual documents</th>
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<tr>
<td>Terms of Use for Managing Entities (ToU ME)</td>
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<tr>
<td>Contractual document between 4C and MEs</td>
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<tr>
<td>Terms of Use for Certification Bodies (ToU CB)</td>
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<td>Contractual document between 4C and CBs</td>
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<td>Terms of Use for Intermediary Buyers (ToU IB)</td>
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<tr>
<td>Contractual document between 4C and Intermediary Buyers</td>
</tr>
<tr>
<td>Service Agreement with Final Buyers</td>
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<td>Contractual document between 4C and Final Buyers</td>
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*Table 1: Overview: 4C System documents, templates and checklists*

The latest versions of all 4C documents are available on the 4C website and must be applied. They all can be identified by a unique document number, version number and date. For documents translated into languages other than English, the English language version remains the definitive version and 4C accepts no responsibility for any discrepancies between translated versions.

Any updates to the 4C System are published in the 4C System Updates, which are sent to all MEs and CBs cooperating with 4C. It is the responsibility of the MEs and CBs to take the System Updates into account and inform all relevant Business Partners (BPs) and members of staff about such updates. An archive of all System Updates is available on the 4C website. If required, 4C may also develop guidelines to further specify certification requirements.
3 Governance

This chapter lays down the general principles according to which the 4C System is governed. The principles specified in this chapter apply to 4C as an organization, to cooperating CBs, to 4C Units and to other stakeholders of 4C.

3.1 Vision and Mission

As an independent, stakeholder-driven, internationally recognized sustainability standard for the entire coffee sector, 4C aims at anchoring sustainability in coffee supply chains across environmental, social and economic dimensions. 4C is a credible and robust system, applying innovative audit and risk assessment procedures, and is strengthened by a comprehensive integrity program. 4C brings real impact on the ground, enabling continuous improvement and enhancing smallholder livelihoods, and supports companies in achieving and keeping their sustainability commitments.

3.2 Multi-Stakeholder Organisation

The 4C Code of Conduct was developed in a participatory and transparent multi-stakeholder process involving coffee producers, trade and industry as well as various civil society organisations from around the world. In line with the recommendations of the ISEAL Alliance for credible sustainability standard systems, the 4C Code of Conduct is reviewed, and revised if necessary, at an interval of every five years in a multi-stakeholder process. Once the document revision is finalized, the new 4C Code of Conduct will be communicated to all 4C System users with the need to be implemented after a reasonable transition period of six to twelve months, depending on the changes made.

The 4C Board has an advisory function and supports the management in particular strategic issues. The 4C Board consists of representatives of 4C stakeholder groups (coffee growers, traders, roasters, retailers, brand owners, civil society organizations, research). Role and responsibilities of the 4C Board, are transparently described in the 4C Advisory Board By-Law of the 4C Board which is publicly available on the 4C website.
Stakeholders do have the possibility to engage with 4C by giving feedback to the system through public consultations, directly via email, webforms, over the telephone or in person or through the participation at our globally and regionally organized stakeholder conferences.

With regard to specific issues and topics which arise, 4C identifies relevant stakeholders from the different stakeholder groups that have knowledge and experience with regard to the topic concerned and proactively approaches them for consultation.

In order to identify to which stakeholder group a person providing feedback belongs to, 4C requires this information during feedback provision via the webform and public consultation procedure.

CBs are another important stakeholder group for 4C. In the framework of regular trainings, meetings and/or webinars specifically convened for the representatives of recognised CBs cooperating with 4C, CBs can provide feedback in relation to the daily application of 4C to facilitate the continuous improvements of the 4C System.

3.3 System Updates

In the event of adjustments or changes in the 4C System, 4C communicates the adjustments to all Managing Entities (MEs) of 4C Units, Intermediary and Final Buyers as well as to all CBs via System Updates. It is their responsibility to take the System Updates into account and inform all relevant members of staff and Business Partners (BPs) about such updates. An archive of all System Updates is published on the 4C website.

During the revision process of the 4C documents, 4C incorporates the communicated adjustments into the 4C Code of Conduct, the 4C System Regulations, the 4C Certification Body Regulations and/or the 4C audit checklist, documents and tools.

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3.4 Public Consultation

In the event of fundamental changes to one of the existing 4C documents, 4C will publish the respective documents on the 4C website for public consultation in order to gather feedback from its stakeholders. The public consultation period shall be sixty calendar days. After the public consultation, 4C will analyse and consider the feedback received during the public consultation phase before publishing the final version of the document including the date on which it becomes valid. In the case of fundamental changes to existing 4C requirements, 4C will consent for an appropriate transitional period to allow for all stakeholders to adapt to the adjustments or changes.

3.5 Transparency

Transparency is a key objective of 4C. It is important that all parties involved in the 4C System have adequate access to relevant information without compromising the confidentiality requirements of individual entities.

Publicly available information about 4C explicitly includes, but is not limited to:

- 4C Code of Conduct
- 4C System Regulations
- 4C Certification Body Regulations
- 4C Terms of Use for Managing Entities
- 4C Terms of Use for Certification Bodies
- 4C Terms of Use for Intermediary Buyers
- 4C Advisory Board By-Law
- 4C System Updates
- 4C audit checklists and related templates to the audit procedure (e.g. Business Partner Map (BPM), Improvement Plan (IP))
- Up-to-date overview of cooperating CBs recognized by 4C
- Up-to-date overview of certified 4C Units including information on the status of the certification (valid, expired, withdrawn, suspended, etc.) and the country they are located in
- Announcement of all 4C trainings and events
- Documentation of 4C events
- Summary of the contributions and suggestions made by stakeholders during public consultation processes.

3.6 Quality and Risk Management

4C is committed to a continuous improvement of its system. To ensure that the 4C System is effective and efficient, quality and risk management practices must be followed. The quality and risk management in the framework of 4C contributes to a continuous improvement process. It aims at consistency in all activities related to 4C, especially concerning the practical implementation and the secure and credible verification of compliance with 4C System requirements.
**Internal monitoring and document management:**

4C constantly reviews and cross-checks all certification documents submitted by CBs. The same procedure applies to the documentation submitted by MEs to CBs and/or to 4C directly. Irregularities or non-conformities found during this review are documented and directly addressed and communicated with the respective party (CB and/or ME). Whether a 4C Unit is compliant with 4C requirements and receives a 4C certificate is based on the decision of the CB having audited the respective 4C Unit. Certification data and records must be retained for a minimum of six years by all parties. Certification data, records and documents can take any form (hard copy or electronic) as long as there is a mechanism in place to ensure they are properly managed and retrievable.

**Maintenance and monitoring of the 4C System/stakeholder dialogue:**

Stakeholder dialogue enables the identification, evaluation and implementation of stakeholder requirements and desires as well as regional specifics and risk prevention measures. The 4C System must be regularly reviewed and monitored to ensure its effectiveness and efficiency. On a periodic basis, 4C provides feedback to its stakeholders on the feedback received and adjustments implemented and reports to the 4C Board on the course and development of 4C and discusses the strategic orientation.

**4C Integrity Program:**

4C has set up the 4C Integrity Program, to ensure a consistent and objective audit and certification process by CBs cooperating with 4C and to monitor companies’ compliance with 4C requirements. It enables closer monitoring of the CBs auditing and certification activities and is based on an ongoing assessment process that is part of the continuous improvement of the 4C System. It consists of assessments of 4C Units, Intermediary and Final Buyers and CB offices which are planned randomly or on a targeted basis e.g. after risk evaluations or complaints or reports by independent actors such as government agencies, media, etc. on any bad practices which are related to 4C requirements. The assessments are conducted by 4C integrity auditors.

**Benchmarks:**

4C regularly participates in benchmarking processes comparing different systems for sustainability standards. 4C uses the results of those processes and the feedback provided to learn and improve continuously. Information on 4C recognitions and benchmarks can be found on the 4C website. Comprehensive, verified and transparent information on voluntary sustainability standards are provided by the online platform “sustainability map” of the International Trade Center (ITC).

**4C trainings:**

4C has developed a specific training program for auditors, other staff members of CBs, Managing Entities (MEs) of 4C Units and interested stakeholders. The training is used to harmonize the understanding of 4C requirements and procedures, to guarantee consistent audit processes, to update participants on
the latest requirements and also to receive feedback and provide opportunities for discussions.

Data access:

By participating in the 4C System, the ME, on behalf of its BPs, must grant 4C access to a minimum set of predefined BP data, which is relevant for the audit. The ME is accountable to its BPs and 4C on the rights and quality of the information provided. Data collection by 4C enables monitoring and evaluation of progress towards its vision. Data from producers and other types of BPs registered in the BPM covers all data described in the 4C System Regulations.

3.7 Complaints and Appeals Procedure

The consideration and handling of conflicts in a certification system is an essential part of its reliability, continuous improvement and user-friendliness. Clear, definite and transparent rules to deal with submissions of complaints and appeals are required for unprejudiced and prompt handling and conflict resolution. The procedure described applies to complaints and appeals that are related to certification activities received mainly from 4C Units and 4C CBs/auditors but also other parties, such as customers of 4C in the context of 4C certification activities. Complaints and appeals on certification issues are handled by 4C.

Definitions:

- Complaint: a formal (written) expression of dissatisfaction by any related party (complainant) about any other party intentionally not following specified rules or regulations or breaching agreement within the certification process
- Appeal: a formal (written) request for a review of any decision made by 4C or the 4C Board
- Certification decision: a decision made by the CB/auditor regarding the issuance or withdrawal of a 4C certificate

A complaint can be filed when:

- A cooperating CB or an approved 4C auditor has a conflict of interest
- A 4C Unit’s confidentiality is concerned
- A 4C auditor, the CB or 4C is not competent to perform their respective tasks
- A 4C Unit disagrees with the conclusion on their overall result made by the auditor or CB during and/or after the audit
- A 4C Unit is not satisfied with the performance of an auditor or 4C
- An interested party disagrees with the facts by which a certificate was granted
An appeal can be filed when:

- A 4C Unit disagrees with the certificate decision, including (non-) certificate issuance, certificate withdrawal and suspension of the ME and/or 4C Unit
- An interested party disagrees with the certification decision of any 4C Unit
- A CB or a 4C Unit disagrees with the decision of the auditor’s sample selection process
- A CB disagrees with the decision of termination of the cooperation between 4C and the CB
- A CB disagrees with the decision of dis-/ approval of their company and/ or auditors

Formal complaints and appeals on certification matters must be sent in written form (via email, 4C web-form, by post) to complaints@4C-services.org or 4C Services GmbH office at Hohenzollernring 72, 50672 Köln, Germany. The addressee of the complaint or appeal must be 4C.

A complaint or appeal must include the below-described parameters:

- Basic information about complainant such as name and organization. In case the complainant intends to maintain anonymous throughout the further process, the complainant must declare this at the time of submission and provide a reasonable explanation for the request
- A clear description of the nature of the complaint or appeal and supporting evidence
- Grounds for complaints and appeals should be reasonable. Note that complaints and appeals lacking clear justification and supporting evidence will be considered irrelevant and will not be processed

Complaints and appeals are considered unacceptable under the provisions laid down in this chapter if they meet one of the following criteria:

- The requirements regarding form and content are not met. This includes complaints and appeals which are not sufficiently supported by objective and sufficient evidence necessary in order to be able to attain a clear idea and unambiguous understanding of the situation at hand (e.g. allegations based on hearsay)
- The complaint or appeal aims for adjustments of the 4C standard
- The complaint or appeal aims to have sanctions amended, which have been imposed by 4C due to violations or infringements of 4C requirements
- The reason for the complaint or appeal does not explicitly relate to 4C or activities conducted within the framework of 4C

The complainant will be informed immediately about the receipt of their complaint or appeal, the acceptance or rejection for further investigation of the complaint or appeal and what further actions will be taken. Complaints and appeals will be analyzed, investigated and decided on by 4C on a case by case
basis. In the course of investigating the conflict or reason for the complaint or appeal, 4C is entitled to contact the parties and stakeholders affected and to ask for supporting evidence, documentation or statements in order to attain a sufficient understanding of the situation. 4C may schedule an independent assessment in the framework of the 4C Integrity Program if required. If necessary, the 4C Board will be involved in the process in order to bring it to a conclusion. 4C aims to resolve conflicts in a timely manner. Any result and decision will be communicated to the complainant by 4C without delay.

If the complainant does not accept the decision made by 4C, the complainant can file an appeal against this decision. Appeals against such decisions must be filed within thirty calendar days after the complainant has received the decision by the 4C appointed staff. In this case, 4C will re-evaluate the complaint and involve the 4C Board to further conduct the procedure.

The 4C Board members involved in the conflict resolution process must be free of all conflicts of interest with respect to the complaint or appeal and shall not be involved in any decision if they are in conflict with the particular party making the complaint or pursuing the appeal. The 4C Board shall verify all evidencing documents of the parties involved before making a decision. The results of the verification shall be documented. In critical cases, the 4C Board can consult an independent expert. In the event that the involved parties doubt the neutrality or qualification of the expert, the doubts shall be submitted to the 4C Board before the final decision in the process is delivered. Another person can replace the expert should this be decided by the 4C Board.

The decision of the 4C Board shall be made within three months after receipt of the appeal, provided that the complainant cooperated well in the conflict resolutions process. The decision of the 4C Board is communicated to 4C. 4C submits the results to the parties involved. Decisions taken by the 4C Board in the course of dealing with a complaint or appeal are binding and bring the 4C arbitration process to a close.

All complaints and appeals are handled professionally, impartially and transparently. Person(s), leading the handling and resolving a complaint or appeal, are not directly involved in the certification decision related to the complaint or appeal.

### 3.8 Non-Conformities, Infringements and Sanctions

Non-conformities refer to the non-fulfillment of 4C requirements specified in the 4C audit checklist, which are usually identified during the conduct of 4C audits. Infringements of 4C requirements refer to any kind of disregard or violation of 4C requirements as specified in the 4C System documents by any user of the 4C System, which often are identified beyond a specific 4C audit and can be classified as moderate, severe or critical, depending on the degree of severity.

Non-conformities identified during the audit
A certificate can be issued, if a 4C Unit complies with the requirements of 4C. Compliance is proven in an audit carried out by a CB. Before a certificate can be issued, existing non-conformities of the applicable requirements (major check-points) as specified in the audit checklist must always be eliminated. Proof of complete elimination of the non-conformities with major check-points identified in the audit should be verified by the CB prior to making the certification decision, which is required at the latest 60 calendar days after the end date of the full audit conducted. CBs can verify the proofs of the complete elimination of the non-conformities with major check-points either through a new on-site audit or through a desk audit, depending on the type of non-conformities identified and appropriate verification measures. If the proof is not provided in time prior to the required certification decision by the CB after 60 calendar days or they are provided, but are found to be inadequate, the CB must state a negative certification decision in the 4C portal, with which the issuing of a certificate is not possible, and the ME must apply for a new full audit. It is also possible to exclude individual BPs who caused the audit to fail from the 4C Unit and the certificate can then be issued for the 4C Unit with the remaining BPs.

**Figure 2: Process of elimination of non-conformities and issuance of certificate**
Exclusion of BPs

BPs that have been audited non-compliant and are not able to clear the non-conformities with major check-points in time prior to the required certification decision by the CB after the 60-day period need to be excluded by the ME from all its 4C Units it is part of and not just from the 4C Unit where it was audited non-compliant. With regard to the exclusion of the BP from other 4C Units it is part of and that do not belong to the audited ME, 4C will approach the MEs of these other 4C Units to inform them about the exclusion of this respective BP. The MEs must adjust the BPM accordingly. The BP is excluded until the next certification, where this BP needs to be part of the sample and audited compliant in order to become part of the 4C Unit again. To avoid being audited in the recertification audit of all 4C Units it had been part of, the BP can show to the auditor its successful audit report of another 4C Unit’s audit to indicate that it is not mandatory to include it again in an audit. In case the excluded BP is also part of a new 4C Unit that is applying for 4C certification, this exclusion is pointed out to the respective ME during application in the 4C portal. For new 4C Unit applications, the respective BP can only be included, if it has been part of the sample and audited compliant.

Infringements of 4C requirements identified beyond the audit

If infringements with regard to 4C requirements are detected beyond an audit of the 4C Unit, e.g. during 4C internal verification processes or 4C integrity assessments, these infringements with 4C requirements can be classified by the severity of the infringement (moderate, severe, critical), the fault of the responsible actor and the impact for the integrity of 4C, leading to different forms of sanctions.

An infringement is considered to be of moderate severity if it does not violate fundamental 4C requirements and does not have an impact on the downstream coffee supply chain actors. Examples of moderate infringements include infringements with respect to e.g. documentation. Moderate infringements may be corrected by implementing appropriate corrective measures within a specific timeframe. In the case of moderate infringements detected 4C may issue a warning to the 4C System user. A warning can be connected with conditions. Conditions shall be so constructed as to prevent future infringements or to ensure future compliance with the 4C requirements e.g. during the validity period of a certificate. A condition could be a mandatory surveillance audit after a certain period of time, certain documents that need to be provided by the 4C System user to 4C, an increased risk level at recertification, etc. Repeated moderate infringements, especially of the same type, may indicate a systematic infringement and thus may be classified as “severe”.

A severe infringement is substantial and violates fundamental 4C requirements. These are especially those infringements, which have an impact on the downstream coffee supply chain actors, which continue over a long period of time, are repeated or systematic and have a serious (negative) impact. Examples include but are not limited to:

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4C Unit:

- Selling/trading coffee from non-registered BPs in the latest approved BPM of the 4C Unit as 4C certified coffee or selling coffee as 4C certified despite no valid certificate being available at the time of ownership transfer

- Selling one batch of 4C certified coffee multiple times ("double accounting"), e.g. when being certified according to more than one sustainability certification system or being registered in different 4C Units

- Non-conformities with regard to the initial major check-points as specified in the 4C audit checklist

- Failing to provide complete and accurate Annual Update (AU) documents and commercial reporting data in time

- Declining or failing to participate and cooperate in the 4C Integrity Program or surveillance audits ordered by the CB and/or by 4C

- Handling or trading 4C certified coffee batches by facilities or traders not registered in the latest approved BPM of the 4C Unit

- Refusing to provide access to documents, workers or facilities registered in the BPM during the audits

- Unauthorized use of the 4C logo or publication of unauthorized claims related to the 4C certification system. This is valid for on-product or off-product claims

Intermediary and Final Buyer:

- In case Intermediary Buyer is buying directly from ME: Selling/trading 4C certified coffee from 4C Units despite the fact that the 4C Unit did not have a valid certificate at the time of ownership transfer

- Selling one batch of 4C certified coffee multiple times ("double accounting")

- Using the 4C logo and claims on pack despite no or insufficient 4C certified coffee purchased or despite not having accepted the Terms of Use for Intermediary Buyers or signed the Service Agreement for Final Buyers

- Declining or failing to participate and cooperate in the 4C Integrity Program

In the event of severe infringements by 4C Units detected after the 4C certificate has already been issued, the CB must declare the certificate invalid and withdraw the certificate immediately. In the case of ordinarily negligent infringements, 4C may suspend the ME and/or its 4C Unit from recertification for a period of up to six months. In the event of grossly negligent infringements, 4C may suspend the ME and/or its 4C Unit for a period of up to twelve months.
In the event of severe infringements by Intermediary Buyers, the registration on the 4C portal may be suspended up to twelve months, having the consequence of no longer being able to participate in 4C certified coffee trading for this limited period of time. For Final Buyers, a fine can be imposed through the volume-based fee.

Infringements are critical if they are intentional, in particular, non-conformities with the intent to fraud. In the case of critical infringements, especially when this involves confirmed fraudulent behavior of a certified 4C Unit, the CB must declare the certificate invalid and withdraw the certificate immediately. In this case, 4C may suspend the ME and/or its 4C Unit from the 4C System and recertification for a period of up to 60 months.

Critical infringements identified at Intermediary and Final Buyers may lead to the termination of the contractual agreement, the withdrawal of any claim related to 4C and the cancellation of the registration on the 4C portal for up to 60 months. The trading and selling of coffee as 4C certified is no longer possible.

In the event that a certificate is withdrawn due to a severe or critical infringement of 4C requirements, 4C will immediately publish the withdrawal on the 4C website. If 4C imposes a suspension of a ME and/or its 4C Unit due to infringements, 4C will make the suspension including the period of suspension public on the 4C website as well. 4C is entitled to notify other certification systems, CBs, Intermediary and Final Buyers about the withdrawal of certificates and the suspension of MEs and/or its 4C Units in very serious cases with evident impacts to the other stakeholders involved.

If a certificate is withdrawn but the 4C Unit is not suspended, an immediate recertification is possible. Recertification in the case of suspension is only possible if the 4C Unit can demonstrate compliance with the applicable requirements during an audit. 4C is entitled to define specific conditions for the recertification (in the case of suspended MEs and/or its 4C Units or withdrawn certificates) which are suitable for preventing future infringements or for ensuring future compliance with the 4C requirements. This may include, for example, the application of a higher risk level and/or additional surveillance audits of a certified 4C Unit after a specific timeframe to verify and ensure compliance with 4C requirements.

4C is responsible for classifying any infringements in accordance with its degree of severity (moderate, severe or critical) and for assessing the fault of the party responsible as part of a case by case assessment if this is required. 4C may take adequate fact-finding measures such as requesting documents or other evidence to be provided to 4C by the CB and/or the 4C System user. In addition, 4C may ask for a statement to be submitted to 4C by the 4C System user and the CB, if applicable.

If the responsible party reports an infringement to 4C in a proactive and timely manner, this may be taken into account as an extenuating circumstance during the assessment of the particular event. Proactive and timely communication is
Contractual infringements are found to be the case when a recognized CB or a 4C System user does not act according to contractual agreements with 4C. Contractual infringements may include but are not limited to: misleading or false information or communication, confirmed fraud, not cooperating in the framework of the 4C Integrity Program. In the event of contractual infringements, 4C is entitled to suspend the services offered by 4C. This includes customer service via telephone or email, participation in 4C events, public display of certificates on the website of 4C and any other claim related to 4C logo or text claims referring to 4C.

4C requires full compliance of all 4C System users with the 4C requirements. 4C acknowledges the fact that in reality, there might be circumstances preventing the full compliance with the 4C requirements at all times based on e.g. region, farm size, audit time, etc. wherefore exceptions might be required. Within the 4C audit checklist, several check-points are not applicable for smallholders, hence 4C is excepting these operations from compliance with all 4C requirements. Furthermore, 4C allows for exceptions with regard to the compliance with 4C requirements in case evidence can be provided that a non-conformity with 4C requirements is not caused by the 4C System user, but e.g. due to “force majeure”. Cases of “force majeure” might be situations such as a pandemic where companies must protect their workers, suppliers and auditors, natural disasters such as typhoons or flooding making an inspection on the ground impossible, high-risk regions with armed political and drug trafficking, etc. Exceptions will be limited in time and a 4C Unit should not be granted exceptions on a continuous basis. Exceptions granted will be registered in the audit report and recorded within the 4C portal for internal documentation and follow-up.

3.9 Integrity Program

Overview:

The 4C Integrity Program aims to ensure a consistent, objective and reliable audit and certification process by all CBs cooperating with 4C on a global basis. The program was launched to enable closer monitoring of CBs’ auditing and certification activities and companies’ compliance with 4C requirements. It supports the quality and risk management at 4C and provides valuable feedback to 4C regarding the implementation of the standard and its verification.

The 4C Integrity Program consists of monitoring and assessments of 4C Units, Intermediary Buyers (IBs), Final Buyers (FBs) and of CB offices. 4C integrity assessments are planned randomly or on a risk basis after risk evaluations, complaints or reports of non-conformity or fraud.

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4C does not charge any costs of integrity assessments to the participants. The assessments are conducted by 4C integrity auditors and can take place in any country where 4C Units, IBs, FBs and CBs are located. The 4C integrity auditors must be independent and free of any conflicts of interest. They work on behalf of 4C and are not allowed to work for CBs cooperating with 4C at the same time.

The participation of 4C System users in a scheduled 4C integrity assessment is mandatory and may be requested up to two years after the expiry of the last 4C certificate or termination of using the 4C System. Refusal to participate may be considered a severe infringement with the 4C requirements and will be sanctioned (see chapter 3.8).

4C will notify the ME of the 4C Unit, the IB or FB about the integrity assessment with a proposed date for the assessment four weeks prior to the proposed date in writing, by e-mail or fax. In exceptional cases, integrity assessments can be conducted without further notice.

After the receipt of the first notification letter, the selected participant is obliged to respond to the notification letter within 72 hours to confirm participation at the date proposed by 4C. Rescheduling may be possible in case of well-founded reasons upon written request by the selected participant if requested without delay (within 72 hours from the date the notification is sent by 4C). If the selected participant cannot confirm the date proposed by 4C, the selected participant is obliged to immediately provide 4C with two alternative dates. These alternative dates shall be within 60 calendar days from receipt of the first invitation letter sent by 4C. 4C will then assess the proposed date(s). If a selected participant does not reply within the respective timeframe this is considered as non-cooperation and thus a severe infringement of 4C requirements which will lead to sanctions specified in chapter 3.8.

**Integrity assessment at 4C Units:**

The objective of the 4C Unit integrity assessment is to assess the audit and certification process of the CB by auditing a sample of its certified clients. During this assessment (re-audit), the 4C integrity auditor carries out an evaluation of the conformity of the certified 4C Unit on the basis of the

<table>
<thead>
<tr>
<th>4C Units</th>
<th>Intermediary and Final Buyers</th>
<th>CBs/ Auditors</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Location/ region</td>
<td>• Size of the 4C coffee supply chain/ Amount of Intermediary Buyers included in the supply chain of 4C certified coffee</td>
<td>• Number of 4C audits conducted</td>
</tr>
<tr>
<td>• Certification history</td>
<td>• No 4C chain of custody certification in place</td>
<td>• General performance of the CB and/ or the auditor</td>
</tr>
<tr>
<td>• Amount of BPs</td>
<td>• Annual reporting of 4C certified coffee volumes in comparison to real-time reporting</td>
<td>• Complaints received</td>
</tr>
<tr>
<td>• Complaints received</td>
<td></td>
<td>• Reports of non-compliances</td>
</tr>
<tr>
<td>• Reports of non-conformities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Poor quality of ME’s Internal Management System (IMS)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Volumes handled by BP Service Provider</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Table 2: Examples of risk-based criteria per 4C System user**

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applicable 4C procedure documents. The results of this assessment are then compared with the CB’s audit report(s) from the last audit(s).

The CB representative or 4C may attend the assessment as an observer. However, the CB must not influence the assessment in any way. Participation of the respective CB during this integrity assessment is recommended but not mandatory.

To determine the exact schedule of the integrity assessment, 4C or the 4C integrity auditor will contact the ME after the date has been confirmed. A schedule for the assessment and a list of documents that are required prior to, during and after the audit will be provided to the participant. This may include but is not limited to geo-coordinates of the fields/plots or plantations supplying the respective ME provided in shape- or kmz data format, lists of suppliers and recipients of 4C certified coffee, bookkeeping documents of incoming and outgoing amounts of 4C certified coffee, etc. MEs are obliged to provide the respective documents to 4C prior to the integrity assessment to enable a full evaluation of all applicable requirements.

Integrity assessments usually refer to the last full certification audit of that specific 4C Unit, but may, in addition, include addendum\(^1\) and surveillance\(^2\) audits. The 4C Unit integrity assessment is a full assessment and will evaluate compliance with all applicable 4C requirements. The 4C integrity assessment resembles a regular certification audit by the CB and the 4C integrity auditor must be granted access and insight to all sites and documents that the 4C integrity auditor considers relevant for the assessment.

A 4C integrity report is prepared on the day of the integrity assessment at the 4C Unit premises. The report contains the basic data of the assessment (assessed company, contact persons and persons present during the assessment, 4C Unit number, location of the audit/s, etc.), and the findings of the 4C integrity auditor. The report shall be signed by all parties attending the 4C integrity assessment and will be forwarded to 4C. After an internal review by 4C, the integrity report shall be sent as a digital copy to the CB and the ME of a 4C Unit. Depending on the non-conformities detected during the 4C integrity assessment, 4C is entitled to request corrective measures from the CB and/or the ME and its 4C Unit to re-establish compliance with the 4C requirements. If applicable, the report may contain the results of additional analysis such as remote sensing-based verification of land use change or laboratory tests in order to verify compliance with 4C requirements.

\(^1\) Addendum audit: Audit, which applies if new BP Service Providers or new facilities or functions of BP Service Providers (e.g. new wet or dry mill, and/or new warehouse facilities or locations of already existing BP Service Providers in the 4C Unit) are going to be added to a 4C Unit within a three-year certification period. In case of BP Producers, it applies only if the turnover rate of BP Producers is above 10% per year. For further information see chapter 6.1

\(^2\) Surveillance audit: Surveillance audits can be required by the CB or 4C to verify compliance with the 4C requirements during the validity period of a certificate issued by the respective CB. For further information see chapter 6.1

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The 4C integrity auditor may find non-conformities that were also found by the CB during its last audit, non-conformities that were not found by the CB during its last audit and non-conformities that were not found but should have been detected during its last audit. Moderate infringements and their closure shall be included in the Improvement Plan (IP) of the ME and explicitly assessed by the CB during the subsequent regular recertification audit and will be checked by 4C when reviewing the recertification documents. Severe infringements detected during the 4C integrity assessment lead to the withdrawal of the certificate as specified in chapter 3.8. Depending on the severity of the infringements and in case the overall performance of the CB is found to be not acceptable, 4C is entitled to decide on sanctions against the CB, which are specified in the 4C Certification Body Regulations.

**Integrity assessment at Intermediary and Final Buyers:**

The objective of the integrity assessment at IB and FB is to assess the traceability of 4C certified coffee purchased and sold as well as the use of 4C logo and claims, if applicable. During this assessment, the 4C integrity auditor carries out an evaluation of the conformity of the IB or FB on the basis of the 4C requirements. The results of this assessment are then compiled in an integrity report. The report shall be signed by all parties attending the 4C integrity assessment and will be forwarded to 4C. After an internal review by 4C, the integrity report shall be sent as a digital copy to the IB or FB. Depending on the infringements detected during the 4C integrity assessment, 4C is entitled to request corrective measures from the IB or FB so as to re-establish compliance with the 4C requirements and impose respective sanctions as specified in chapter 3.8. This may include as well additional integrity assessments after a specific timeframe to verify and ensure compliance with 4C requirements.

**Integrity assessment at CB office:**

The CB is obliged to allow for and to participate in CB office audits scheduled by 4C. Upon request, 4C is entitled to forward the integrity report to the competent public national authority or accreditation body responsible for recognition or accreditation of the CB, especially in case of severe infringements of the CB or its auditors. For further information on the CB office audit and the CB sanction procedure, please have a look at the 4C document “4C Certification Body Regulations”.

### 3.10 Impact Assessment

The 4C impact assessment has the goal to monitor the outcomes and impacts of 4C certification. The 4C impact assessment is conducted regularly on a scientific basis. When conducting the impact assessment, 4C takes into account the principles laid down by ISEAL for “Assessing the Impacts of Social and Environmental Standards Systems”.


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4C is committed to raise the social, economic and environmental conditions of coffee production and processing worldwide. These impacts are achieved if 4C activities result in greater social and economic development in the areas controlled by 4C Units, improved productivity, living income and risk management as well as long term conservation of biodiversity, soil and water resources.

The 4C impact assessment monitors and evaluates the information gathered from the certification process of 4C Units as well as from the 4C Integrity Program. Generally, all dimensions (economic, social, environmental) that are covered by 4C certification are subject to the impact assessment. As 4C’s principles are primarily designed to improve the sustainability of agricultural production, it is expected that the most significant impacts from certification will occur on the farm level. Therefore, a focus of the 4C impact assessment will be on assessing the impact on farm level. Other BPs can be included, in particular regarding the outcomes and impacts of certification on the management systems and the traceability of products.

One part of the impact assessment is the internal assessment of the 4C System’s performance. The system performance includes the coverage of the system, meaning e.g., the quantity of issued certificates, the quantity of 4C Units and the countries in which they operate. Furthermore, it includes the quantity of withdrawn certificates, the performance of the CBs and the quantity and results of 4C integrity assessments. This information will be used for the continuous improvement of the 4C System.

The impact reports resulting from the 4C impact assessment will be published on the 4C website. Learnings from the assessment will be evaluated and if suitable implemented within the 4C System through its continuous improvement process.
4 System Set-up

4.1 The 4C Code of Conduct

The 4C Code of Conduct is a set of sustainability principles and criteria for the production of green coffee beans. Its inclusive nature aims to reach out to producers who are currently not participating in the market for sustainable coffee and bring them into compliance with economic, social and environmental sustainability criteria. The 4C Code of Conduct is publicly available on the 4C website.

At the time being, other certification schemes are not accepted under 4C. Any coffee claimed as 4C certified coffee must consist entirely of 4C certified coffee. Coffee certified under any other certification scheme cannot be accepted in 4C Unit’s supply chains. The recognition of certification schemes other than 4C requires a positive equivalence benchmarking result by 4C. 4C reserves the right to withdraw the acceptance of certification schemes in case of, for example, bankruptcy or indication of fraud of an accepted certification scheme or significant changes in scheme requirements or procedures.

4.2 Participants

4C is globally applicable to the certification of green coffee beans. 4C can be applied by any type of green coffee beans producing entity (4C Unit) based in any coffee producing country that wishes to produce and sell coffee as 4C certified.

Please find below a detailed description of the relevant participants of the 4C System, which are:

- 4C Services GmbH (4C)
- 4C Units including ME and BPs
- CBs
- Intermediary and Final Buyers

4.2.1 4C Services

4C Services is an operator of the 4C System. The main tasks of 4C include:

- To operate the 4C System and ensure its credibility
• To support 4C Units, CBs and stakeholders
• To develop and continuously revise the 4C System documents, audit checklists, 4C portal, etc.
• To operate the quality management and Integrity Program
• To monitor compliance of 4C Units with the 4C requirements - including reviewing audit reports and AUs
• To train, approve, and supervise CBs
• To manage certification and commercial reporting data of 4C Units and FBs
• To engage in marketing activities
• To involve in projects to improve the 4C System
• To handle complaints and appeals with regard to 4C related issues
• To continuously develop and improve the 4C System

4.2.2 4C Units

A 4C Unit is a green coffee producing group that includes any type of production and process facility and that produces a minimum of 20 tons of 4C certified green coffee per year. Each element of the supply chain, from the production of the coffee up to the sale of the green coffee bean (including farmers, wet mills, traders, dry mills, exporters, etc.), has to be covered within 4C certification by being part of a 4C Unit.

A 4C Unit is set up of a ME and BPs. 4C differentiates between BP Producers, which refers to coffee farmers, and BP Service Providers, which refers to operators being part of the supply chain after the production of the coffee cherry, including e.g. local traders, warehouses, dry and wet mills. A 4C Unit must, as a minimum, include BP Producers and a ME. In addition to that, a 4C Unit may also include dry mills, wet mills, local traders and/or warehouses. A ME may manage more than one 4C Unit and also BPs are allowed to be part of more than one 4C Unit.

The size of a 4C Unit is limited by the capacity of management of the ME with regard to the capacity to enable, monitor, and measure the implementation of the 4C requirements within the 4C Unit and to provide respective trainings and services to the BPs.

The relevant elements of a 4C Unit are the following:

1. **Managing Entity**: The ME administrates the 4C Unit. Each 4C Unit is required to have a legally registered person, company or organization who is responsible for the implementation of the Internal Management System (IMS) and all other 4C requirements and the ensuring of its compliance within the 4C Unit. It needs to be defined prior to the application for certification in order to have clearly defined who is responsible for the 4C Unit’s performance, monitoring and reporting on improvement. The ME is the holder of the 4C certificate and the only one allowed to sell the 4C certified coffee from its 4C Unit. The address and name of the ME will be published on the 4C certificate. The address
cannot be a post box. So-called “letterbox companies” cannot participate in the 4C System.

2. **BP Producer:** A BP Producer is a legally registered person, company or organization who is responsible to manage the agricultural operation and implement the applicable 4C requirements. The total area of the farm, including any owned, leased or rented land, must be compliant with 4C requirements in order to be part of a 4C Unit, not just the coffee plots registered in the BPM of a 4C Unit. 4C differentiates between big/medium BP Producer and smallholder BP Producer, as some of the 4C criteria do not apply for smallholder BP Producer. A BP Producer is considered a smallholder if its workforce consists primarily of family and/or household labour or workforce exchange with other members of the community and whose coffee farm is normally not larger than five hectares. “Primarily” means that the contracted workforce should not be more than or replace the family workforce. The contracted workforce should only complement the family workforce to a small extent and not replace it. Exemptions to this definition are only allowed for countries or regions where an official definition of the term “smallholder” is available for coffee growers or similar crops to coffee. Prior to applying this exemption 4C must be contacted and asked for approval.

3. **BP Trader:** BP Trader is a service provider that trades (buys and sells) sustainable coffee (i.e. cherry beans, parchment, green beans) within the 4C Unit.

4. **BP Storage:** BP Storage is a service provider operating a warehouse to store sustainable coffee (i.e. parchment, green beans). BPs which are processing coffee are assumed to also store coffee and do therefore not need to be considered as BP Storage if not offering pure storage services to third parties.

5. **BP Processor:** BP Processor is a service provider that operates a wet and/or dry mill and provides this service to other BPs. Examples to illustrate the activities of wet and dry mills are the following, but these activities may differ depending on the region and general set up: A wet mill may include both the ferment-and-wash method of wet processing and the machine-assisted method wet processing which leaves the coffee bean surrounded by the parchment. During the dry milling process, in general the dry parchment is removed. A dry mill may carry the process of hulling, sorting, grading and bagging of green coffee beans. Dry milling may be applied to both wet-processed (washed coffees) and dry processed (natural coffee) coffee cherries.

*Figure 4: Example of a simplified 4C Unit supply chain for green coffee beans*
4.2.3 Certification Bodies

4C cooperates with ISO 17065 accredited and independent third-party CBs that are responsible to conduct audits and to issue 4C certificates after a positive compliance assessment with the respective 4C requirements. The respective body responsible for the recognition or accreditation of a CB is also responsible for the monitoring and surveillance of the CB. The monitoring and surveillance of the CBs is complemented by the 4C Integrity Program.

Furthermore, 4C closely cooperates with the CBs, e.g. in the form of regular meetings/webinars held to exchange feedback and practical experiences with the aim of continuously improving 4C. Before a CB is allowed to conduct audits and to issue 4C certificates, the CB has to accept the 4C Terms of Use for CBs and its 4C auditors must be formally trained and approved by 4C.

Names and contact details of all CBs that cooperate with 4C are published on the 4C website. The requirements to become a cooperating CB and to conduct audits under 4C are laid down in the “4C Certification Body Regulations”.

4.2.4 Intermediary and Final Buyers

Intermediary Buyer: Trader, exporter, importer, processor, or any other entity which trades or originates 4C certified coffee outside the 4C Unit. MEs of 4C Units could also act as Intermediary Buyers (IBs) when buying 4C certified coffee from other MEs.

Any IB who claims sustainable sourcing through 4C certified coffee purchases must have accepted the Terms of Use for IBs. In order to accept the Terms of Use, IBs must register in the 4C portal. By confirming the registration in the 4C portal as IB, the IB accepts the Terms of Use for IBs. A prerequisite to handle coffee as 4C certified is the validation of the registration of the IB by 4C via the 4C portal.

IBs that would like to get 4C certified can do so on a voluntary basis.

All IBs need to comply with the trading requirements as described in chapter 9 on “Commercial Reporting”.

Final Buyer: Last actor in the supply chain purchasing 4C certified coffee. It can either be a roaster, instant coffee manufacturer, private label company, retail company with private label, brand owner, coffee shop chain, or any other entity that is sourcing 4C certified coffee.

Any Final Buyer (FB) who claims sustainable sourcing through 4C certified coffee purchases must have a valid Service Agreement with 4C.

FBs that would like to get 4C certified can do so on a voluntary basis.

FBs need to comply with the commercial reporting requirements as described in chapter 9.
4.3 Internal Management System (IMS)

The IMS is the core element of the 4C Unit. It is a documented set of internal procedures and concrete measures that the 4C Unit’s ME implements in order to achieve compliance with the 4C requirements. It must be implemented by the ME to ensure that the 4C requirements are properly implemented by the ME and all BPs within the 4C Unit. An IMS is crucial to enable the certification of producer groups, mainly to include small producers. The IMS includes internal audits, controls and reports, whose performance, quality and robustness will be verified by complete external audits. Mature and robust systems with the capacity to manage and mitigate the group’s internal risks allow the reduction of external audits, as the sample-size of on-site audits is determined by the risk level of the 4C Unit. The IMS focuses on continuous improvement and impact measurement. If any activities or responsibilities related to IMS and its respective procedures and records are outsourced, the relationship with the third parties must be documented and the roles and responsibilities of each party clearly defined.

The IMS includes at least the following:

- An appointed person or group in charge of the IMS
- Roles, responsibilities and knowledge of staff, elected persons, and committees
- Procedure for approval/disapproval of (new) members of a 4C Unit
- Complete and updated BPM (see next chapter for further information on BPM)
- Mutual commitment by the ME and BPs in implementing the 4C requirements. This includes that all BPs have been informed by the ME about the 4C requirements and that they are aware of their obligation to comply with these requirements as well as written agreement from all BPs on the commitment to and compliance with the 4C requirements. New BPs joining the 4C Unit during the validity period of the certificate must always provide such a written agreement to the ME prior to joining the 4C Unit
- Training plan for BPs
- Land use map of the 4C Unit
- Procedure for internal assessments, including risk and needs assessment
- An implemented traceability system, including record keeping
- Procedure for sanctions and appeals
- Improvement Plan (IP) to mitigate the identified risks and to prepare the 4C Unit for the upcoming audits, to be updated annually
- Procedure on Annual Updates (AUs), including procedure on updating the BPM and on the implementation and measurement of continuous improvement as specified in the IP
- Agreement with third parties regarding the implementation of IMS, if applicable.
4.3.1 Business Partner Map (BPM)

The Business Partner Map (BPM) is a tool that enables MEs of 4C Units to manage the data and performance of individual BPs. MEs of 4C Units must complete the BPM before applying for an audit and keep it always up to date. The BPM is an excel sheet that MEs fill out with the basic data of BPs, which has to be updated at least on an annual basis.

The BPM template is publicly available on the 4C website. A guidance sheet on how to correctly fill out the BPM is included in the BPM excel sheet template. The BPM has to be updated each year and provided to the CB and 4C for verification in the framework of application for an audit or as part of the submission of documents for the AUs.

4.3.2 Internal Assessment by Managing Entities

MEs must conduct and document internal risks and needs assessments of their 4C Unit to identify certification gaps, which will be checked by the auditor during the certification audit. The internal assessment must be regularly conducted to serve multiple purposes:

- To make sure that BPs of the 4C Units have understood the 4C requirements
- To check internally if compliance with 4C requirements is achieved
- To identify gaps and needs for improvement
- To set up risk/need-based trainings for BPs
- To reduce the risk of failing the upcoming certification

MEs need to have a clear procedure in place on how they do the internal assessment and how they identify needs and risks. The ME needs to make sure that the BPs compliance with 4C requirements is checked appropriately. Auditors are required to check MEs procedure for conducting internal assessments and how MEs are ensuring compliance of all BPs. Awareness-raising activities, trainings, etc. are necessary as well as incentive and sanction mechanisms in case of non-conformities of BPs. The results of the internal assessment must be documented, reviewed and signed by the ME and must be made accessible to the CB during the certification audit.

The internal auditors in charge must be qualified to professionally judge the relevant questions. Before they start auditing, they must be trained regarding the requirements of the 4C System. Training of the internal auditors should continue on a regular basis, especially with a focus on relevant risks identified within the group.

4.3.3 Improvement Plan (IP)

Prior to the issuance of the certificate, The ME of the 4C Units must develop an IP based on the results of the external audit, with the aim to address non-conformities within the 4C Unit with check-points that are currently still minor but will be lifted to major check-points during the next certification audits (see

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The IP includes all non-conformities of minor check-points, even if only detected at one BP of the sample. The IP should support the ME in its continuous improvement management to prepare itself and its BPs for the next certification audits. The IP must be provided to the CB for final approval and must be uploaded to the 4C portal by the CB together with all other relevant audit documents.

If other types of audits (addendum, surveillance, integrity) occur within the same three-year certification period, the results of these audits must also be included in the same IP, as the IP accompanies the ME throughout the entire period of the validity of its 4C Unit’s certificate.

The Plan, Do, Check, Act (PDCA) cycle, based on the principles of ISO 19011 can be applied for internal management (see figure 5).

![PDCA cycle for IMS: Plan, Do, Check, Act](image)

The IP template based on the certification audit results will be automatically generated via the 4C portal once the CB has uploaded the audit report into the 4C portal. The implementation status has to be updated each year and provided to the CB for verification in the framework of application for an audit or as part of the submission of documents for the AUs. The implementation status report must be based on the initial IP.
5 Certification Process

This chapter describes the entire process of certification, from the initial contact between MEs, 4C and CBs up to the approval of Annual Updates (AUs) to maintain the certificate. All parties involved are expected to implement and comply with the respective requirements.

The complete certification process, including its maintenance after the certificate has been issued, can be summarized in the nine steps indicated in figure 6.

Restart from step one to apply for the renewal of the certificate or to apply for an addendum or surveillance audit.

The application and audit documents contain relevant data about the amounts of sustainable coffee handled by a 4C Unit. This is necessary to enable 4C to accumulate reliable information about the total amounts of sustainable coffee covered by 4C certification and/or the total cultivation area complying with 4C requirements. 4C will treat this information from individual 4C Units confidential if not required otherwise by law or by competent authorities. 4C is entitled to gather, accumulate and publish such data about the system in anonymised form.

A detailed description of the audit process and requirements is provided in chapter 6 on “Audit Process and Requirements”.

5.1 Organisation of a 4C Unit

To be able to be certified under 4C, a 4C Unit has to be set up and prepared for certification. The following tasks are required from the ME to organise and prepare the 4C Unit for certification:

- Familiarize with the requirements of the 4C System (4C Code of Conduct and 4C System Regulations)
- Take responsibility for the 4C Unit

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• Identify the coffee producers to join the 4C System, who agree to implement the 4C requirements and who agree to supply 4C coffee to the ME
• Identify all other elements of the supply chain that will be handling the coffee cherries or dried beans originating from the identified producers
• Communicate to all BPs the sustainability and certification requirements of the 4C System
• Obtain the acceptance of participation in the 4C Unit by all BPs. A written agreement should be evidenced. The written agreement is required once when a BP is joining the 4C Unit and needs to be renewed every time a revision of the 4C Code of Conduct with fundamental changes took place
• Fill in and update documents and forms of the 4C System (BPM, IP)
• Diagnose the compliance level of all BPs to the 4C requirements (internal assessment) and identify needs for improvement on an annual basis
• Implement the principles of the 4C Code of Conduct within the 4C Unit
• Confirm the exclusion of non-conformities with major check-points in the 4C Unit
• Design an IMS for the 4C Unit that complies with the 4C IMS requirements
• Implement the IMS within the 4C Unit
• Contract one of the CBs cooperating with 4C to organize the audit and to issue the certificate upon a positive audit and to evaluate and approve the Annual Updates (AUs) required to maintain the certificate

After implementing the 4C requirements, the ME must apply for an audit via a 4C cooperating CB.

5.2 Certification Process

5.2.1 Application for a 4C Audit

An audit can only be conducted after an application has been registered and validated within the 4C portal by the CB and 4C for a 4C Unit. The application has to be done for each kind of audit, including certification, surveillance and addendum audits (see chapter 6.1 for further information on the different types of audits). An application for an initial certification audit includes the receipt of a unique registration number which will be communicated to the ME of the 4C Unit and CB. The registration number is unique to each 4C Unit and will be included on the 4C Unit’s certificate at a later stage and remain valid as long as the 4C Unit exists. The receipt of a 4C Unit registration number after the initial application does not entitle the 4C Unit to handle coffee as 4C certified, this is only allowed after the receipt of a certificate. For the application, the following tasks are required:
1. The ME needs to select and sign a contract with one of the CBs cooperating with 4C. A list of approved CBs is available on the 4C website.

2. The ME needs to fill in the application documents and send them to the selected CB. The application documents consist of the BPM and IP. The BPM template is available on the 4C website. The IP is the one which has been generated during the previous certification audit and was updated throughout the certification period. In case of initial certification, no IP needs to be provided during the application process.

3. The CB has to check the application documents with regard to the correct template version used and with regard to the correct and complete filling out of both documents. After a positive evaluation, the CB approves the application documents and registers the application in the 4C portal. Both MEs and CBs must make use of the automatized pre-check of the BPM to see if all data was filled in correctly and completely by the ME and to see if the physical and commercial coffee flow make sense. The process works as follows and can be repeated as many times as necessary:

   Upload the BPM excel sheet [here](#). The system extracts all information and transfers it to the 4C portal. Results are presented in different categories: clear errors (e.g. non-unique national identification number) or non-conformities with requirements (e.g. missing geo-coordinates for BP Service Providers).

   **Additional features are:**
   - Automatic calculation of the turnover rate (see chapter 6.1)
   - Automatic comparison of BP Producers with the Brazilian Transparency List of Contemporary Slave Labour
   - Automatic check of BPs unique national identification numbers and availability of geo-coordinates
   - Automatic generation of the physical and commercial flow charts within the 4C Unit as per information supplied in the BPM

4. The ME needs to accept the most current version of the 4C Terms of Use for MEs in the 4C portal and confirm the application in the 4C portal, confirming that an application for an audit was actually requested and confirming the correctness of the data inserted.

5. 4C validates the application in the 4C portal and provides the ME with a unique 4C registration number (if it is a new 4C Unit).

6. The CB has to conduct a first risk assessment and prepare the audit plan (see chapter 6.4 for information on the audit plan and chapter 7 for information on the risk assessment).

7. The CB needs to register the audit plan in the 4C portal, including relevant information on identified risk levels, sample sizes, etc.
The on-site audit must be conducted no later than six months after the date of validation by 4C. Otherwise, 4C is authorised to annul the application. In case the applicant is still interested in becoming 4C certified, the application process has to be started again. Exceptions may only be made if evidence can be given that the delay is not owing to the applicant, but e.g. to “force majeure” or the CB instead. (Please note that in the framework of this regulation, one month is regarded as equal to 30 calendar days).

4C will supply the selected CB with the documents which were approved by 4C, and any other possible relevant documents from previous audits, if this is the case. Based on this information, the CB will conduct a risk assessment and prepare the audit plan (see chapter 7). If CBs need more relevant information other than the ones supplied in the application documents, they are responsible to contact MEs and request relevant information from the 4C Unit requesting an audit proposal. This is to make sure that their proposal will be relevant and realistic in terms of time and resources needed for an adequate audit.

### 5.2.2 On-site Audit

After the validation of the 4C application by 4C and the registering of the audit plan in the 4C portal, the on-site audit can be conducted, which includes the following tasks:

1. The CB audits the ME’s and BPs’ compliance to the 4C requirements on-site using the latest version of the 4C audit checklist template, BPM and IP. The last two documents have already been provided during the application process and will be checked for correctness during the on-site audit
2. The CB prepares the audit report by inserting the audit results in the audit checklists and audit result page
3. The CB uploads the audit report into the 4C portal to automatically generate the IP template for the ME
4. The ME fills in the IP based on the non-conformities with minor check-points identified during the audit that become major check-points during the next certification audits and presents it to the CB (see chapter 6.5)
5. The CB evaluates and approves the IP prior to making its certification decision

The CB needs to provide a copy of the audit report, signed audit result page and approved IP to the ME.
Details of the audit process and audit requirements can be found in chapter 6 on “Audit Process and Requirements”.

5.2.3 Audit Report Evaluation

After the on-site audit has been conducted, the CB analyses and approves the audit report and the filled-in IP from the ME, together with all pertinent documents and evidences. If necessary, the CB will contact the auditor or the ME to obtain further details and clarification. The CB must make sure that the audit report including the corresponding attachments is complete, consistent, and the certification recommendation provided by the auditor is coherent with the information provided in the audit report’s result page, where a certification recommendation by the auditor is requested. If any changes are made to the audit report and its result page during the audit report evaluation process, a copy of the revised audit report and result page needs to be provided to the ME and be uploaded into the 4C portal.

5.2.4 Certification Decision and Issuance of Certificate

After a positive audit and evaluation of the audit report and IP, the CB issues a certificate to the ME of the audited 4C Unit and uploads in the 4C portal all pertinent documents and information (audit report, signed audit result page, BPM, IP). The certificate can be issued with immediate validity or with a beginning validity once the current valid certificate has expired in order to avoid overlapping of certification periods. 4C certificates are documents that confirm compliance of the certificate holder with the requirements of the 4C System, are valid for three years and may be subject to a surveillance and/or integrity audit at some point during the three-year period. The certificate will be published on the 4C website and can be freely accessed by any interested party. Any buyer of 4C certified coffee is obliged to verify the validity of the supplier’s 4C certificate at the date of the transferral of ownership of 4C certified coffee.

If major non-conformities are identified during the audit, evidenced and reported which cannot be corrected prior to the certification decision by the CB required after 60 calendar days, the certification decision will be negative, i.e., the certificate is not issued. A full new audit must be conducted once the 4C Unit is ready to comply with the 4C requirements in order to achieve a 4C certificate by the CB.

4C internally validates the certification documents uploaded by the CB and might come back to the CB and/or ME for clarifications in case of doubts.

The CB who has issued the certificate is responsible for the compliance of the 4C Unit with 4C requirements during the validity period of the certificate. In case the ME decides to change the CB within the three-year validity period of a certificate e.g. conducting addendum audits or evaluating AUs (see chapter 5.3.2) the ME of the 4C Unit should inform 4C beforehand in written, provided that its decision and justification for a CB change are reasonable and a new
A certificate would need to be issued by the newly contracted CB after the audit or evaluation has taken place. The new CB is now responsible for the conformity of the 4C Unit's compliance with the 4C requirements. The newly contracted CB needs to receive the former audit documents. It is up to the newly contracted CB whether an additional on-site audit or surveillance audit is required in the framework of e.g. evaluating AUs in order to come to a positive certification decision and issue a new certificate. But if an integrity assessment is conducted, the CB takes responsibility for any non-conformities identified that should have been already detected by the auditor during the certification audit. Therefore, in case of doubt, the newly contracted CB is required to conduct a surveillance audit. A change of CB during an audit or evaluation process of AUs is not possible. The validity period of the certificate remains the same, despite a new certificate having been issued.

5.3 Maintenance of the Certificate

5.3.1 Continuous Improvement

In order to maintain the 4C certificate throughout the three-year period the following tasks are required from the ME:

- Implement the proposed improvement actions within the 4C Unit which are stated in the IP within the three-year period of certification, indicating progress each year during the AUs (see chapter 5.3.2)
- Monitor compliance performance of the BPs of the 4C Unit and be able to report this to 4C
- Measure the results and impact of the improvement actions
- Report to 4C on sales of 4C coffee every year through the 4C portal (see chapter 9 on “Commercial Reporting”)
- Receive surveillance or integrity assessment at the office of the ME and the chosen BPs within the 4C Unit

The BPs are responsible for the following:

- Report intentional or unintentional non-conformities to the ME
- Produce, trade, store and process coffee according to 4C requirements
- Commit to implement amendments and corrective actions
- Supply progress information to the ME
- Show the ME changes and improvements achieved
- Cooperate with the ME on supply of relevant information

5.3.2 Annual Updates (AUs)

To keep the implementation of 4C requirements in 4C Units cost-effective for MEs, the approach of 4C is to have three-year certification periods with an on-site audit at the beginning of each period, but without regular annual audits in between by third-party auditors. On the other hand, for system credibility, compliance and continuous improvement needs to be monitored. Therefore, after the first and second year of certification, the ME is obliged to send to its
contracted CB (preferably the one who has conducted the previous audit) an updated set of documents respectively called AU1 and AU2, which includes the BPM and the IP.

**Updated BPM:**

The ME needs to update all data included in the BPM prior to sending it to the CB. This includes inclusions and exclusions of BPs, inclusion of geo-coordinates and national identification numbers, if still missing, coffee production/harvest of the last twelve months, data on the physical and commercial flows of coffee inside the 4C Unit, etc. 100% of all geo-coordinates and national identification numbers need to be available for BP Producers one year after the compliance level 1 audit, at the time of the AU1. For BP Service Providers, 100% of all geo-coordinates and national identification numbers need to be available already prior to issuing a certificate.

**Updated IP:**

The ME needs to monitor the progress of the improvement actions listed in the IP. The IP must be updated by inserting the current implementation status of each action proposed by the ME and the actions that are now being proposed for the next twelve months, based on the initial IP set up at the certification audit, plus any other additional non-conformities that have been identified in other audits over the three-year period of validity of the certificate and that have been added into the IP. The aim of the IP is to ensure that the 4C requirements will be fully met by the time of recertification.

<table>
<thead>
<tr>
<th>Initial IP</th>
<th>Annual Update 1</th>
<th>Annual Update 2</th>
<th>Application for next audit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proposed actions</td>
<td>Status of implementation</td>
<td>Status of implementation</td>
<td>Status of implementation at application</td>
</tr>
<tr>
<td>Expected measurable results (with clear objectives and % of achievement)</td>
<td>Proposed actions for the period between AU1 and AU2</td>
<td>Proposed actions for the period between AU2 and application for next audit</td>
<td></td>
</tr>
<tr>
<td>Deadline for implementation</td>
<td>Deadline for implementation</td>
<td>Deadline for implementation</td>
<td></td>
</tr>
</tbody>
</table>

**Figure 8: Structure of the 4C Improvement Plan**

The CB then evaluates and approves the AU1 and AU2, by checking if all documents have been handed in correctly and completely filled out. In case of doubts, a surveillance audit may follow to ensure the implementation of the 4C requirements. Approved AU documents must be uploaded to the 4C portal by the CB.

MEs are held responsible for data accuracy, truthfulness and correctness of the information that they provide in AUs. This is monitored by CBs and 4C and verified on-site latest during certification audits.

The timely provision of the AU documents is part of the 4C compliance mechanism and failing to fulfill this requirement is considered a severe infringement of 4C requirements. This includes the timely cooperation between

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MEs and CBs in case clarifications or adjustments are required. If the evaluation process of the AU documents has not been finalized and approved by the CB within 60 calendar days after the due date of the submission of the AU documents to the CB, the certificate for that 4C Unit will be withdrawn and the 4C Unit will be suspended from recertification for six months (see chapter 3.8).

However, the mere sending of AU documents by the ME to the CB is not sufficient to maintain the 4C Unit’s certification. In order for the certification to remain valid, the documents must be evaluated and approved by the CB. If problems are detected during the revision of the documents, this will also lead to consequences as specified in chapter 3.8. It is the responsibility of the ME to ensure that the evaluation and approval or disapproval of the AU documents is concluded as soon as possible, within the 60 calendar days from the AU due date.

In case the evaluation of the AU documents revealed that an addendum audit is required (see chapter 6.1), the CB has to first register an application for addendum audit in the 4C portal prior to finalizing the evaluation and approval of the AU documents in the 4C portal. The addendum audit needs to take place within 60 calendar days after the evaluation closing date of the AU documents.

If the ME decides to outsource any of its responsibilities, documented evidence must be available to describe the formal link between ME and subcontracted parties regarding staff corresponding roles and functions. This documentation must be incorporated in the IMS of the ME.

Figure 9: Continuous improvement throughout the three-year certification period
6 Audit Process and Requirements

Clear requirements on how to conduct audits and how to manage risks in the framework of 4C are an integral part of 4C’s quality policy. They are key factors for ensuring the integrity, reliability, credibility and high-quality assurance of 4C. Furthermore, they facilitate a consistent verification of the 4C requirements by the CBs and their auditors.

The audit requirements specified in this chapter describe how 4C audits are to be conducted at a 4C Unit, the relevant aspects to be considered and procedures to be followed and the implications of risks for 4C audits.

In order to facilitate the carrying out of reliable and consistent audits, 4C prescribes audit checklists to CBs which have to be used during the audits. The audit checklists are working documents containing the 4C requirements laid down in the 4C System documents. 4C uses the filled-in audit checklists to perform internal reviews and risk analyses, conducting the 4C impact assessment and to evaluate the performance of CBs and auditors.

6.1 Audit Types

The following audits can be conducted by the CB:

Certification audit: Certification audits are the basis for a CB to issue a 4C certificate. Certification audits must be conducted during harvest season and need to take place on-site at least every three years.

Surveillance audit: Surveillance audits can be required by the CB or 4C to verify compliance with the 4C requirements during the validity period of a certificate issued by the respective CB. Surveillance audits may focus only on the implementation of specific aspects of 4C requirements and can be either on-site or desk-audit, depending on the means required to fully check compliance with the relevant 4C requirements.

Addendum audit: An addendum audit is a full audit, which applies if new BP Service Providers or new facilities or functions of BP Service Providers (e.g. new wet or dry mill, and/or new warehouse facilities or locations of already existing BP Service Providers in the 4C Unit) are going to be added to a 4C Unit within a three-year certification period. In case of BP Producers, it applies only if the turnover rate of BP Producers is above 10% per year. The turnover rate is the rounded ratio between new BP Producers or existing BP Producers with new plots and old net BP Producers (“Net” meaning: BP Producers remaining after exclusions). Family members taking over a coffee plot that has already been part of the 4C Unit before but managed by another member of the family are also considered as new BP Producers.

\[
\text{turnover rate} = \frac{\text{producer included}}{\text{producer previous} - \text{producer excluded}}
\]
The turnover rate is automatically calculated when uploading the new BPM into the 4C portal. The turnover rate is calculated annually with the uploading of the AU documents, comparing the current BPM data with the older BPM version archived and approved during the previous AU or certification audit. Addendum audits can be conducted at any point in time. BP Service Providers can begin to commercialize and/or handle 4C certified coffee only once an addendum audit has taken place and has had a positive result. BP Producers can only sell 4C certified coffee to its respective ME once they have undergone an internal audit by the ME (documentation as evidence required) and having been included in the BPM, regardless of whether an addendum audit is required or not.

6.2 General Requirements

All members of a 4C Unit that go through a 4C audit must comply with relevant national and regional laws and regulations as long as those laws and regulations do not violate any requirements of 4C. In case of discrepancies, the stricter rule shall always be followed. If, for example, certain countries have legislation in place that allows for a certain degree of forest clearance for agricultural production which violates the 4C requirement on no cutting of primary forest and destruction of other natural resources within protected areas, it would not be allowed to produce coffee under the 4C System on these areas.

100% of the BPs of a 4C Unit have to comply with all 4C requirements relevant for the respective compliance level. If one or more sampled BPs or the ME refuse to receive auditors or give access to their records and/or facilities, the audit cannot be concluded. In such cases, the audit is only accepted as completed if the auditor receives access to the requested premises and information, or if another additional visit is conducted in order to have access to all necessary information.

The BP and ME have to address all relevant non-conformities with major check-points which have been detected during an audit. The ME must set up corrective measures for the identified non-conformities of major check-points, which have to be implemented by the BP prior to the required certification decision by the CB after 60 calendar days. The BP or ME cannot be positively certified or audited if the auditor does not come to a positive conclusion regarding the implementation of corrective measures. If the ME does not meet the requirements, the 4C Unit cannot be certified. If BPs do not meet the requirements, they cannot be accepted as a member of the 4C Unit and supplier of 4C certified coffee and must be excluded by the ME from all its other 4C Units they are currently part of. If not excluded by the ME, a certificate to the 4C Unit cannot be issued. 4C will inform the MEs of other 4C Units the excluded BP may also be part of accordingly. Partial compliance (e.g. only fulfilling parts of the 4C requirements) is not sufficient to declare the coffee produced as sustainable. If the auditor cannot verify the implementation of corrective measures prior to the required certification decision by the CB after 60 calendar days, the audit is considered as failed. A new full audit must be
conducted. 4C must be informed by the CB about BPs, which are audited non-compliant or which refuse to be audited as a part of a sample. The audit report used during the audit must be submitted to 4C even if the CB will make a negative certification decision due to non-conformities with major check-points which were not corrected within the respective deadline.

If non-conformities are detected during a 4C audit that lead to questioning the sustainability claim made by the 4C Unit members during the previous certification period, 4C and the CB are entitled to impose conditions for recertification of the 4C Unit. Conditions may include the requirement to submit copies of relevant documents for a specific period to 4C and/or to the CB and that the CB conducts a surveillance audit after a specific period after recertification. This especially applies in case of severe infringements that have an impact on the downstream supply chain.

The certification audit must take place during harvest season in order to sufficiently ensure that the 4C requirements are met. An exception exists for 4C Units undergoing initial certification that would like to become 4C certified and handle coffee as 4C certified already prior to the upcoming harvest season. Here, a surveillance audit during the upcoming harvest season has to be conducted to fully verify the compliance with 4C requirements. It has to be ensured that the coffee harvested during the previous harvest season prior to 4C certification is only handled as 4C certified coffee if an IMS was already implemented allowing the full traceability of the 4C coffee back to the BP Producer and if none of these BPs has been identified to be non-compliant with any of the major check-points of the compliance level 1. In order to avoid a gap between two certification periods, the audit has to be conducted during the harvest season closest to the expiration date of the certificate and prior to its expiration. This can be anything from less than a month up to twelve months (only in exceptional circumstances).

In order to achieve 4C certification, the total farm area must be compliant with 4C requirements and not only the fields of the BP Producer where coffee is cultivated. Example: If a farmer has cut primary forest to convert it into a cocoa plantation after 2006, this farmer can not be certified according to 4C, even though no deforestation might have taken place for coffee production.

MEs and BPs must provide CBs and auditors with full access to all information necessary for their work during an audit. If any document, record or other information is not available at the time of request by CBs or auditors, 4C Units must ensure it is made available before the end of the audit. 4C Units and CBs must retain all relevant documents for the verification of 4C requirements for at least six years.

4C Units are obliged to provide accurate and true information to 4C and the CB. Furthermore, 4C Units are obliged to declare to 4C and the CB the names of all other sustainability certification systems they are participating in simultaneously to 4C, or sustainability certification systems they have previously been participating in (certification history). 4C Units are obliged to
make available to the CB all relevant information including bookkeeping data and the auditing reports also regarding other sustainability certification systems used in order for the CB to verify that multiple claiming (so-called “double-accounting”) of sustainable coffee cannot and did not occur. This is also necessary to verify the overall plausibility of incoming and outgoing 4C certified coffee and ensures that not more sustainable coffee is sold than has been received.

BPs participating in 4C are obliged to enable the full assessment and evaluation of all applicable 4C requirements, including relevant activities that are outsourced to subcontractors. Relevant subcontractors, e.g. for the application of plant protection products, transport and handling of coffee batches, outsourced labour suppliers and other subcontracted activities must be included in the audit if this is necessary to evaluate full compliance with 4C. This should be included appropriately in contractual agreements between the BP and the relevant sub-contractors. Contractual agreements must be accessible during the 4C audit.

4C audits are retrospective and focus on the verification of compliance with 4C requirements during the previous certification period. An exception to this rule is the first (initial) audit of a 4C Unit, during which a retrospective audit of sustainably produced coffee claims is not possible and thus the focus of the audit is on the necessary procedures that need to be in place to appropriately implement and apply the 4C System. When reviewing documents and records during an initial audit, a period up to six months prior to the date of audit will be considered. During other types of audits, a period starting from the previous certification audit will be considered.

An audit to verify compliance of a 4C Unit is required at least every three years. The ME is responsible to arrange for a timely recertification of the 4C Unit in order to avoid the risk of a gap between two certificates. Backdating of certificates and extensions of certificates are not possible. If there is an indication of non-conformity or fraud the frequency or intensity of audits may be increased. This means, that a CB is entitled to conduct additional (surveillance) audits e.g. in case there is reasonable doubt of compliance with the 4C requirements or in order to verify substantiated allegations of fraudulent behavior. It is the CB’s responsibility to define the intensity of the audit or the size of a sample that will permit the CB to reach the level of confidence necessary to issue a certificate.

4C audits have to be conducted on-site at the location of the subjects to be certified. Audits are conducted throughout the entire supply chain of the 4C Unit.

Particular aspects of an audit, especially the risk assessment and the analysis of land use change after 2006 on a specific area may be conducted on-site, or by using tools which may even provide a more reliable level of assurance than an on-site audit, or by a combination of on-site and desk audit. The use of independent traceability databases may also allow for an equivalent level of assurance.
assurance as an on-site audit. Precondition for verifying compliance with 4C requirements based on such tools is the analysis and approval of the respective tool by 4C as being appropriate to provide at least the same level of assurance as an on-site audit.

In any case, audits must follow a risk-based approach and take into account the risk according to the principles specified in chapter 7. This means, if the result of a desk audit based on tools or systems approved by 4C does not provide a sufficient level of assurance or even indicates non-conformity with 4C requirements (e.g. indication of land use change in the area of cultivation), the CB must take appropriate further actions to sufficiently verify compliance, e.g. the audit on-site.

Audits should be conducted taking into account the principles specified in ISO 19011 (plan, do, check, act) or justified equivalent.

If compliance with the 4C requirements has been verified during the audit, the CB has to make its certification decision no later than 60 calendar days after the last day of the audit. Together with the decision, the audit documents (audit report, signed audit result page, BPM, IP) have to be uploaded into the 4C portal. In order to avoid overlaps of certification periods, the validity starting date of the certificate can be aligned with the validity expiration date of a current still valid certificate. Backdating in case of a gap between two certification periods is not possible. The CB is responsible to properly plan, conduct and report on the audit especially with respect to nature, timing and extent of evidence-gathering procedures. The audit must be conducted in such a way that a meaningful level of assurance for a decision regarding compliance with the 4C requirements is available. The CB must be responsible to provide further evidence or information in a timely manner if that is requested by 4C during the internal validation process.

6.3 Interviews During Audits

Interviews with workers, be it at the level of the ME or the level of the BPs, are a critical part of 4C audits. If both female and male workers are present, both should be interviewed. The number of worker interviews of each BP should be proportional to the number of workers hired by a BP or the ME. Any accompanying person must not answer the questions that auditors ask to BPs and workers. In order to receive objective and uninfluenced information from interviewees, auditors may request representatives of the ME or employers of workers to not participate in the respective interview.

Auditors may judge that it is necessary to obtain information from other sources through interviews with other local stakeholders, e.g. teachers in nearby schools, union representatives outside the 4C Units, community leaders, input providers, representatives/stores or local NGOs to confirm or refute certain information.
6.4 Audit Plan

An audit plan must be set up and registered in the 4C portal, including the upload of the GRAS risk assessment report as specified in chapter 7. The audit plan to be provided to the ME includes dates, times, activities, duration of activities, travelling periods, locations of each activity, place of the opening and closing meeting, risk levels, sample sizes, etc. The audit plan could also serve as the opening of the sample list to the ME, but not necessarily, as the audit plan might be provided to the ME prior to the opening of the sample.

Names of the selected BPs to be audited shall only be announced to the ME of a 4C Unit a maximum of 48 hours before the audit takes place. The selected BPs to be audited shall not be influenced in any way by the ME. Opening the sample with such a short notice prior to the start of the audit compensates the size of the sample. Short notice delivers the unannounced audit approach. In the 4C System, this is a common practice for all audits, bringing credibility to the certification system.

6.5 Specific Audit Requirements

The 4C audit checklist provides four different sheets, one for MEs, one for BP Producers, one for BP Service Providers and one for a summary of the audit results.

The audit result page of the audit checklist provides general audit information for the whole 4C Unit audit, such as compliance level of the 4C Unit audited, type of audit, sample size, etc. Furthermore, it presents an overview of non-conformities of major and minor check-points identified during the audit with the information whether non-conformities of major check-points could be cleared and verified prior to the required certification decision by the CB 60 calendar days after the date of the audit.

The 4C audit checklist, that needs to be used during any kind of audit, contains three levels of compliance, which are named compliance level 1, 2 and 3. With each new certification audit, the level of compliance needs to be increased, as indicated by the compliance levels in the audit checklist. The requirements included in the 4C audit checklist are differentiated between major check-points and minor check-points. All check-points, both major and minor, need to be audited during each certification audit. The major check-points of compliance level 1 must always be complied with in order to become certified. Non-conformities with regard to minor check-points are accepted but must be marked as such in the audit checklist. The IP which is generated automatically from the 4C portal right after the auditor has uploaded the audit report into the 4C portal includes all non-conformities with regard to minor check-points that do become major check-points during the next certification audits. The ME needs to fill-in the IP right after the audit, with improvement actions being SMART (specific, measurable, achievable, reasonable, time-bound) and relating to impact. The IP then needs to be provided to the CB for evaluation and approval prior to the issuance of the certificate. During the certification
period of three years, MEs are obliged to implement actions from the IP approved by the CB in order to prepare itself and the BPs of the 4C Unit to comply with all major check-points of the next compliance level.

Once having conducted an audit according to compliance level 1, no matter how many new BP Producers join a 4C Unit at a later stage (e.g. at compliance level 2), the audit would have to be conducted according to the compliance level the 4C Unit would be in. It is not allowed to go back to compliance level 1 as 4C does not certify individual producers but a whole 4C Unit (see example A below). Hence the compliance levels of the 4C Unit would have to be continued, despite the fact that many new BP Producers might have joined the 4C Unit. The same logic applies in case there might be a certification break between two compliance levels in the future (see example B below).

Example A
4C Unit reaches compliance level 2 and applies for recertification

Example B
4C Unit is in compliance level 1, certificate expires in 2022. In 2024, after a break, the 4C Unit applies to restart 4C certification

Figure 10: Examples of compliance level determination

It is not allowed to form a new 4C Unit including old BPs in order to avoid the verification of compliance with the 4C requirements in a certain compliance level. E.g. this includes “new” 4C Units that are set up and certified to avoid being audited against requirements of a renewal audit or to avoid suspension of BPs of a certain 4C Unit. Auditors need to check this issue, before allowing a new 4C Unit to be certified.

4C offers chain of custody certification for Intermediary Buyers (IBs) which trade 4C certified coffee outside the 4C Unit, as may be requested by some FBs. The same applies for FBs. A specific audit checklist for IBs/FBs must be used, covering requirements with regard to the IMS, business integrity, coffee safety and quality as well as traceability. A 4C certification for IBs and FBs is not mandatory in order to handle coffee as 4C certified, but the reporting requirements as laid down in chapter 9 have to be complied with by all IBs and FBs.
7  Risk Assessment and Sample Size Calculation and Selection

The procedure for risk assessment and sample size calculation and selection consists of the following steps:

| 1 | IDENTIFICATION of the GRAS Index only for BP Producers |
| 2 | ANALYSIS of risk indicators for BP Producers and BP Service Providers |
| 3 | DEFINITION of final risk levels |
| 4 | CALCULATION of the minimum size of samples |
| 5 | SELECTION of samples |

**Figure 11: Risk assessment and sample size calculation and selection procedure**

### 7.1  Risk Index for BP Producers

The auditor must identify the GRAS index\(^4\) for the BP Producers of a 4C Unit by using the [GRAS tool]().

The use of the GRAS tool is mandatory for all types of 4C audits, except for surveillance audits.

The GRAS index ranges and respective risk levels yielded by the GRAS tool are:

<table>
<thead>
<tr>
<th>GRAS index range</th>
<th>Respective risk level per GRAS index range</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 – 0,2</td>
<td>Low</td>
</tr>
<tr>
<td>0,2 – 0,4</td>
<td>Medium</td>
</tr>
<tr>
<td>&gt; 0,4</td>
<td>High</td>
</tr>
</tbody>
</table>

To obtain the GRAS index of a 4C Unit, the geographical coordinate (longitude and latitude) of the central point, as well as the radius of each sourcing area in the 4C Unit, must be entered in the GRAS tool.\(^6\)

Click [here](#) for a video with a detailed description of this process.

Only BP Producers listed in the BPM being presented by the ME at the application for a 4C audit should be considered for the analysis of the sourcing area, to determine the central point and radius of the area.

For addendum audits, only the new BP Producers being included in the 4C Unit are to be considered as the basis for the identification of the GRAS index.

---

\(^4\) The GRAS index is an overall risk score which merges relevant data on biodiversity, land use change, carbon stock, and social indices on specific regions.

\(^5\) The GRAS tool is currently the only tool offering the risk analysis as required by 4C. Should other tools become available covering the same criteria and analysis approach, these could also be applied.

\(^6\) Sourcing area is the area where the coffee BP Producers of a 4C Unit are located. BP Service Providers are not to be included in the analysis of the sourcing area.
For those 4C Units where there are clearly multiple sourcing areas due to the existence of clear geographical clusters of BP Producers, the identification of the central point and radius should be done per cluster. In this case, after obtaining the GRAS index for each cluster, a weighted average must be calculated based on the quantity of BP Producers per cluster, in order to obtain one final number (final index) for all BP Producers in the 4C Unit. This final number must be matched with the corresponding level of risk defined by the GRAS tool (table above).

E.g. a 4C Unit has a total quantity of 350 BP Producers which are geographically located in two clearly different clusters (sourcing areas):

<table>
<thead>
<tr>
<th>Cluster</th>
<th>Quantity of BP producers</th>
<th>GRAS Index</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>100</td>
<td>0.03</td>
</tr>
<tr>
<td>2</td>
<td>250</td>
<td>0.22</td>
</tr>
</tbody>
</table>

\[
\text{GRAS Index} = \frac{100 \times 0.03 + 250 \times 0.22}{100 + 250} \approx 0.17
\]

\[
\text{Risk Level} = 0.5 \times \sqrt{(100 + 250)} = 9.35
\]

**Figure 12: Identification of GRAS index and respective risk level**

In this example, because the weighted average result falls in the lower range of the GRAS index, the risk level to be used is low and leads to the application of the factor 0.5 times the square root.

### 7.2 Risk Indicators for BP Producers and BP Service Providers

After identifying the GRAS index for the BP Producers of a 4C Unit, the auditor must also analyze as a minimum, the following additional risk indicators:

- Quality of ME’s Internal Management System (IMS): self-assessments made by ME, risk/needs assessments made by ME, BPM data quality, robustness of training plans and improvement plans, etc.
- Presence of BPs or of the ME itself in national government ban lists on any of the issues covered by the major check-points of compliance level 1.
- History of the 4C Unit: past suspended certificates, non-conformities identified in previous audits, risk to any of the major check-points of compliance level 1, indication of possible non-conformities due to public statements or reports/press releases made by the media, watchdog organizations, stakeholders, etc.
- Geographic conditions: location in declivity areas, natural disaster-, social conflict- or land use conflict zones, etc.
• Volumes handled by BP Service Providers of the 4C Unit: analysis of the 4C Unit’s commercial and physical coffee flow charts and of the respective volumes handled by each BP Service Provider.

• Analysis of country-specific risk lists as provided by 4C. These lists are no complete lists but are constantly revised, adjusted and expanded and which serve only as a supplement to other sources of country-specific information on risks. The country-specific risk lists can be downloaded from the 4C portal.

The auditor must analyze the potential risks of non-conformity to all 4C requirements in the 4C Unit.

As for BP Service Providers of a 4C Unit, the auditor may skip the use of the GRAS tool, but must analyze at least the above-stated additional risk indicators, as well as the potential risks of non-conformity to all 4C requirements.

7.3 Definition of the Final Risk Levels for a 4C Unit

The auditor must define two separate final risk levels, low, medium or high: one risk level for BP Producers and one risk level for BP Service Providers.

BP Producers:

The GRAS index of the sourcing area (or multiple sourcing areas) in a 4C Unit is the predominant risk level which must be applied. But the GRAS index level can be increased (never lowered) in case the auditor comes to a different conclusion from the above-stated minimum additional risk indicators as well as the potential risks of non-conformity to all 4C requirements. After this, the auditor must define which final risk level will be applied in the audit.

For 4C Units with BP Producers located in a country that is not yet covered by the GRAS tool at the moment of the risk assessment for a 4C audit, auditors must use other remote sensing tools to identify potential risks that could be seen through satellite images. In addition to that, the auditor must analyze at least the above-stated additional risk indicators, as well as the potential risks of non-conformity to all 4C requirements.

BP Service Providers:

In order to define the risk level for the BP Service Providers of a 4C Unit, the auditor may skip the use of the GRAS tool, but must analyze at least the above-stated additional risk indicators, as well as the potential risks of non-conformity to all 4C requirements.

7.4 Calculation of the Minimum Size of 4C Samples

After defining the final risk levels of BP Producers and BP Service Providers in the 4C Unit, the minimum sample size must be calculated separately for each, using the factors shown in the table below.
The result of each calculation must be rounded up to the nearest whole number.

<table>
<thead>
<tr>
<th>Risk levels</th>
<th>Factors square root</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low</td>
<td>minimum 0.5 times the square root</td>
</tr>
<tr>
<td>Medium</td>
<td>minimum 1.0 times the square root</td>
</tr>
<tr>
<td>High</td>
<td>minimum 1.5 times the square root</td>
</tr>
</tbody>
</table>

*Table 3: Factors of the square root to be applied for different risk levels*

The ME is always counted apart from the defined minimum quantity of BP Producers and BP Service Providers.

Either or both calculated sample sizes can be increased during the audit at auditor’s discretion, in case it becomes evident during the audit that the risks are actually higher than what was defined during the desk analysis.

In addition, if non-conformities with regard to any of the major check-points of compliance level 1 have been detected during the previous certification audit, the risk level for the recertification audit needs to be increased, even though the BPs where these non-conformities have been detected may no longer be part of the 4C Unit.

### 7.5 Selection of 4C Audit Samples

The selection of the components of both samples, one for BP Producers and one for BP Service Providers, is up to the judgement of the auditor, as long as the following conditions are met:

For certification audits, the samples must contain new and old BPs, both in the sample of BP Producers and in the sample of BP Service Providers. The ME is always audited against the full audit checklist for MEs.

For addendum audits, the samples must contain only new BPs, both in the sample of BP Producers and in the sample of BP Service Providers. The ME is always audited, but only against the IMS related check-points of the ME audit checklist.

For certification and addendum audits, the following conditions must also be met:

- At least one of each type of the BP Service Providers existing in the 4C Unit must be included in the sample, even if this requirement leads to increasing the result of the square root factor used, thus consequently increasing the size of the sample. BP Service Providers with multiple functions should be considered as one additional type.
  
  For example, if there are three BP Service Providers, one trader, one wet mill, and one trader who is also a wet mill, these should be considered as three different types of BP Service Providers.

- Samples must be as representative as possible, covering BPs with different characteristics such as region/clusters/locations, volumes of coffee produced by BP Producers, volumes of coffee handled by BP Service Providers, yields, farm sizes, distances to the ME, use/non-use
of water by mills, quantity of workers, quantity of farms per producer, quantity of facilities per BP Service Providers, etc.

For surveillance audits, the definition of the risk levels, size of samples, and the selection of the samples is up to the judgment of the auditor. The ME may or may not be audited, depending on the scope of the surveillance audit. If the ME is to be audited, it should be audited only against the specific check-points applicable to the defined scope of the surveillance audit.
8 Traceability

Traceability within a supply chain is the ability to identify, track and trace a product or substance as it moves through the supply chain from raw goods to finished products.

Traceability provides a benefit, in that, it offers the ability to investigate and troubleshoot matters related to a component or ingredient and it can be used to settle customer complaints and questions about the product that was sold. Traceability is also a method to boost brand image amid consumers' growing concerns about the sourcing of what they consume and the products they buy.

Traceability in 4C means that 4C certified coffee can be tracked and traced in all steps of the coffee supply chain, from the BP Producer up to the Final Buyer. Traceability provides assurance to the coffee sector and the consumers that coffee sold as 4C certified is sourced from 4C certified producers. It ensures that not more 4C certified coffee is sold than has been harvested or purchased and that conventional coffee is not traded as 4C certified coffee. Traceability means that 4C certified green bean coffee needs to be identifiable as 4C in all relevant documents and packaging within the 4C Unit.

![Traceability within 4C supply chain](image)

Figure 13: Traceability of 4C certified coffee throughout the coffee supply chain

Commercial transactions are defined through the legal transfer of ownership between sellers and buyers strictly linked to the physical product, with or without physical movements of the coffee beans. Any other type of commercial transaction or sale/purchase commitments, including future contracts, are out of the scope.

Within 4C Units, full traceability has to be ensured and verified during the 4C audit. Outside of 4C Units, traceability is ensured through mandatory annual reporting of all transactions via the 4C portal (see chapter 9 “Commercial Reporting”). In addition, Intermediary and Final Buyers of 4C certified coffee must have records available which indicate the date and quantities of incoming and outgoing 4C certified coffee volumes, including the names of the corresponding supplier and recipient, that might be subject to verification in the framework of the 4C Integrity Program (see chapter 3.9 “Integrity Program”). A chain of custody 4C certification for Intermediary and Final Buyers can be done on a voluntary basis.
Correct implementation of traceability management practices is crucial to ensure that:

- 4C certified coffee producers are valued and awarded.
- Commercial transactions of 4C certified coffee are properly recorded in the 4C portal and available at any time.
- Physical coffee deliveries match with the corresponding delivery notes, storage documentation, invoices and shipping documentation.
- The quantity of coffee traded as 4C certified coffee does not exceed the quantity of 4C certified coffee actually produced and harvested.

8.1 Specific Traceability Requirements for 4C Units

The ME is the 4C certificate holder and is solely responsible for trading 4C certified coffee from the 4C Unit. No BP from a 4C Unit is allowed to trade 4C certified coffee.

The ME of a 4C Unit can only trade 4C certified coffee produced by and bought from the registered BPs of the 4C Unit. When accepting a bid from buyers or making an offer to sell 4C certified coffee, the ME of the 4C Unit must have a valid 4C certificate and 4C certified coffee available before it may conduct any commercial transactions.

If stored coffee is available during the initial audit, it can be traded as 4C certified coffee after the first 4C certificate is issued and as long as the following conditions are met:

- The coffee in storage has been harvested in the harvest season immediately prior to the audit or harvested during the period of no more than twelve months before the closing date of the audit.
- The records made available to the auditor during the audit confirm compliance with the requirements described in this chapter from the harvest up to the facilities where the coffee is stored, that is, that the coffee batches remained segregated from non-4C certified lots until the date of the audit.

Physical segregation is the only traceability model allowed within the 4C Unit.

In physical segregation, 4C certified and non-4C certified coffee is kept physically separated. Under physical segregation, it must be possible to identify the batches of 4C certified coffee throughout the entire production, delivery, processing, packing and distribution process. 4C certified coffee must be clearly identified, segregated, stored, and protected from being mixed with coffee beans from non-4C certified coffee at each BP and the ME of the 4C Unit.

Within 4C, physical segregation means that there is no mixing of 4C certified with non-4C certified coffee. The 4C certified coffee can be traced back to the BP Producer, or to the point where it was mixed with 4C certified coffee.
Identification systems for segregation are in place at the ME and each BP to ensure that 4C certified coffee is traceable.

Physical segregation can be achieved by:

- Setting up parallel processes for production, storage and transport.
- Setting up sequential and periodical processes at the site of production, storage or transport. In this case, maximum levels of contamination must be calculated and documented.

During the audit, the CB must especially verify the traceability and plausibility of the incoming and outgoing amounts of 4C certified coffee as well as the conversion factors applied in each step within the 4C certified BP wet and/or dry mills. A part of the assessment of the conversion process is the determination of conversion factors describing the relations between sustainable input and sustainable output.

### 8.2 Specific Traceability Requirements for Intermediary and Final Buyer

The Intermediary and Final Buyers can only trade coffee as 4C certified that was initially bought from a certified 4C Unit. The 4C certificate must be valid on the date when the 4C certified coffee is purchased, meaning on the date that the first buyer received ownership of the coffee or coffee batch from the MEs of 4C Units. This date must have the documental support of the respective issued invoice. Any first buyer purchasing 4C certified coffee directly from the ME of a certified 4C Unit is therefore obliged to verify the validity of the supplier’s 4C certificate at the date of the transfer of ownership of the 4C certified coffee.

The only traceability option allowed for Intermediary and Final Buyers is physical segregation.

### 8.3 Documentation and Record-Keeping

Good management practices related to traceability must be implemented to ensure that all 4C certified coffee commercial transactions are properly recorded and available at any time, including a comprehensive relation between the physical coffee deliveries (shipment or reception) and the corresponding invoices. This is also applicable for commercial transactions without physical movements.

Every commercial transaction, physical movement and processing activity of 4C certified coffee must be documented (e.g. delivery note, weighbridge ticket, sorting, blending and stock reports, invoice, receipt, sales slip, shipping list or bill of lading).

Supporting documentation for traceability must be available at every step in the supply chain. The documentation is a part of clear procedures, appropriate control actions and records (digital or on paper) that are established and managed by the ME.

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Documents that need to be available at BPs and MEs include:

- Records that give a clear link between product flow and documentation. This includes records of incoming and outgoing 4C certified coffee (e.g. delivery notes, weighbridge tickets, storage documentation, invoices), records of any internal processing of 4C certified coffee including the respective conversion factors (if applicable), records on the periodic reporting on opening and closing stock for incoming and outgoing 4C certified and non-4C certified coffee, list and contracts with all suppliers and buyers of 4C certified coffee.

- Periodic reporting system (e.g. monthly and yearly) regarding the incoming quantities and storage levels at the beginning and end of the period and the outgoing quantities of 4C certified and non-4C certified coffee.

- Records and documentation on traceability and bookkeeping including quantity harvested, processed, stored and traded must be complete, up-to-date and accessible at each BP.

The 4C certificate number must be indicated in all sale and purchase contracts and the corresponding invoices. In case of coffee blends from different 4C certified sources are traded by the Intermediary Buyers, all certificate numbers need to be included in the delivery documents, contract and invoices.

If a BP, ME, IB or FB is simultaneously certified under more than one certification scheme or handling coffee from different certification schemes, so-called double accounting must not take place. An example of double accounting is: “A BP certified under 4C and another certification scheme X, sells one same coffee lot once classified as 4C certified coffee and once classified as certified under the scheme X”. In order to ensure that no double accounting takes place, it must be checked during the audit, whether a ME or BP is certified under more than one certification scheme. The System users must declare the names of all certification schemes they participate in and provide the auditor with all relevant information, including the audit reports and traceability information for auditing.
9 Commercial Reporting

This chapter covers the requirements on how to report the traded volumes of 4C certified coffee, which is a requirement for users of the 4C System. These requirements apply exclusively to commercial transactions of green coffee beans (unroasted) and are applicable to national (domestic) and international (export and import) commercial transactions.

All transactions of 4C certified coffee by actors in the 4C supply chain, from ME to FBs must be recorded in the 4C portal. The report must be made transaction by transaction, which means that for each transaction reported there must be a corresponding invoice. Annual reporting is mandatory, however, reporting of individual batches throughout the year is also possible. To access the 4C portal, users need a login and password provided by 4C. The 4C portal is accessible via the 4C website. MEs, IBs and FBs must appoint and inform 4C regarding the staff in charge of commercial reporting. With this information, 4C will provide the necessary login and password for the first access.

The 4C portal is open for reporting during the whole calendar year. The timeline to conclude the annual reporting for any calendar year is the 28th of February of the following calendar year. It is the responsibility of the MEs, IBs, and FBs to comply with the reporting deadline.

9.1 Requirements for Managing Entities

The first actor in the supply chain selling 4C certified coffee is the ME of the 4C Unit.

The second actor in the supply chain is the first buyer. The first buyer buys 4C certified coffee directly from a ME. A first buyer can be one of the following:

- MEs of 4C Units (becoming an Intermediary Buyer in this case)
- Intermediary Buyers (IBs)
- Final Buyers (FBs)

In case a ME is operating as the first buyer, the corresponding requirements valid for IBs are applicable as described in chapter 9.2.

MEs are required to report into the 4C portal the amount of 4C certified coffee sold, including the name of its recipient, the amount of 4C certified coffee sold as non-4C certified (conventional), the amount of discarded 4C certified coffee and the amount of 4C certified coffee carried forward to next year.

9.2 Requirements for Intermediary Buyers

In order to trade 4C certified coffee, IBs must register in the 4C portal by providing the complete name and contact data of the legal registered company and the contact details of relevant staff who will be in contact with 4C. This is valid for all IBs that are taking ownership of 4C certified coffee within the supply chain. In addition to the registration, IBs could apply to become 4C certified on
a voluntary basis in order to meet the requirements of specific FBs that require certification of the whole supply chain.

All IBs, including those 4C certified and non-4C certified, are required to report into the 4C portal the amount of 4C certified coffee sold, including the name of its recipient and the 4C certificate number under which the 4C certified coffee was traded.

If a FB requires the entire chain of custody to be certified, all commercial transactions reported on the 4C portal must be covered by a valid certificate, i.e. purchases from suppliers without a valid 4C chain of custody certificate on the date of transfer of ownership of 4C certified coffee (date of issue on invoice) are not valid and therefore cannot be reported as purchases of 4C certified coffee.

9.3 Requirements for Final Buyers

The last actor in the supply chain purchasing 4C certified coffee is the FB.

In case a FB is operating as IB for certain transactions, the corresponding requirements valid for IBs are applicable for the corresponding transactions, as described in chapter 9.2.

Final Buyers are required to report into the 4C portal the amount of 4C certified coffee purchased, including the certificate number under which the 4C certified coffee was purchased.

9.4 Data Security and Confidentiality

The 4C portal operates with high-security standards. 4C uses the highest security measures to keep reported data confidential. Only consolidated data are published in order to provide transparency to external and reliable organizations on demand.
10 4C Logo Use and Claims

10.1 Introduction

Logo and claims can be applied to 4C certified coffee packages (on-product) or in general communication and other types of merchandise materials (off-product). Claims are attributes of a product or service that are announced to an audience in form of text, through marketing channels, final packaging, or other printed materials. 4C has developed this chapter to facilitate a correct logo and claims use and respective communication throughout the supply chain while maintaining 4Cs objectives of transparency and credibility.

Claims related to 4C shall generally fulfill the following criteria\(^7\): The claims must be clear, easy to understand and shall not be misleading. In line with that, claims shall be accurate based on substantiated evidence. Furthermore, they must be relevant for the issue and not a distraction from bigger and more important issues. The claim must be transparent, providing unambiguous information about the applied (certification) system easily available and accessible.

The implementation of the guidelines for the 4C logo and claims presented in this chapter is mandatory for all 4C stakeholders which have received approval to use the 4C logo. This chapter specifies the requirements on the proper use of the 4C logo and claims on 4C-certified products and other promotional products, and it must be considered as the evaluative basis in the 4C logo approval process.

This chapter will be updated by 4C to incorporate best practice examples of potential claims (“Example Claims”, Annex II). 4C welcomes suggestions and feedback from stakeholders regarding logo and claims use.

10.2 General Requirements

The 4C logo holds copyright protection and is a registered trademark.

Any party wanting to use the 4C logo and/or claims, explanatory statements about the 4C System as well as on-product and off-product claims, must receive written approval from 4C upon request prior to its use. Any misuse of the 4C logo and claims is prohibited and can lead to criminal charges. Traceability of the coffee through the entire supply chain must be given in any case where the 4C logo or a 4C related claim is used.

To obtain approval by 4C and to receive the logo file, interested parties shall send a request for a logo and claim use to 4C via the official 4C e-mail address (info@4c-services.org). It should be clearly stated in the request for which use or application the logo and claims are intended and where they will be placed.

\(^7\) Based on the requirements of the ISEAL alliance
For this purpose, a copy or draft of the intended design should be submitted to 4C. The request for logo and claim use will then be reviewed by 4C. If the request complies with the requirements outlined in this chapter, 4C will reply with a written approval and provide a high-resolution file of the 4C logo for the intended application. In case adjustments are required to comply with the requirements described in this chapter, they will be clearly indicated in 4C’s feedback via e-mail. The formal approval via e-mail from the 4C team must be issued before printing or publishing the final label or communication material. This is valid for on-product and off-product logos with or without text claims.

The use of on-product logo and claims for the advertisement to end consumers includes the obligation to be in the possession of a valid contract with 4C. No additional fees to the annual volume-based fee charged to FBs are charged to authorize the use of the 4C logo.

Claims that directly refer to 4C should follow the provisions laid down in chapter 10.4 and 10.5. This includes such claims that explicitly include the name 4C or claims that explicitly refer to the 4C certified coffee or claims that are made on a product that exclusively contains the 4C logo (and no other sustainability-related logos) thus establishing a direct link between the claim and 4C.

General sustainability-related claims which do not directly reference 4C (e.g. “green product”, “best choice for a sustainable future”, “saving the environment”, etc.) are not subject to approval by 4C. As no “official approval” of such general claims by 4C is required (or possible), companies can freely decide to use such claims. When making such general claims, it shall be avoided that third parties are given the impression that the claim directly relates or references to 4C. This could, for instance, be the case, if a general claim is made in close proximity to the 4C logo, particularly if no other sustainability-related logos are used, as this could establish an unfounded or inadequate link to 4C.

Furthermore, the eligibility of particular claims depends on the exact wording (e.g. “based on”, “featuring”, etc.) and how this wording can be understood by stakeholders and consumers. It is the responsibility of the company to ensure that 4C related claims are in line with this guidance chapter. Communication and marketing, particularly towards end consumers (business-to-consumers or B2C) but also towards suppliers and clients (business-to-business or B2B), may be subject to legal regulations, national labelling requirements and consumer protection laws. 4C cannot be held liable for compliance with the respective regulations of the countries where the stakeholder intends to sell and distribute the product.

4C does not take any responsibility for the legal implications of the use of this guidance chapter and does not claim that following this guidance chapter will result in legal compliance. The guidance given in this chapter is not intended as a substitute for legal advice. It is recommended that companies discuss claims also with their legal department to ensure compliance with consumer protection laws in the respective country. It is, therefore, the responsibility of

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the stakeholder to implement claims that are not only attractive from the marketing point of view but that are also legally correct to avoid potential greenwashing allegations and damage to the user’s reputation.

A correct and appropriate use of the 4C logo and related claims is necessary to maintain the 4C certification standard’s credibility. Critical or false claims may result in legal implications for companies. Any direct claim, statement or reference made to the name “4C Services”, the letters “4C”, or to the 4C logo that is not in line with the respective rules outlined in this chapter will be regarded as “unauthorized”. 4C reserves the right to publish any case of misuse or unauthorized use, request correction and compliance with requirements and/or take legal action against any party that uses the 4C logo without written approval. The same applies to MEs and 4C Units that are still using the 4C logo and claims despite the fact that their certificate has expired, has been withdrawn or they have been suspended from certification. The 4C logo and claims must not be used anymore and must be removed immediately from all sites and communication channels, as well as printed materials, when there is no valid certificate in place anymore. 4C does follow up on this on a regular basis through random checks of former 4C certified MEs and 4C Units.

With giving the permission of the logo use, 4C is permitted to publish examples of the respective companies for marketing purposes on e.g. its website and presentations.

10.3 4C Climate Friendly Coffee

The 4C Climate Friendly Coffee trademark is a special 4C logo indicating a climate friendly coffee production and processing. The 4C Climate Friendly Coffee logo can only be applied if a greenhouse gas (GHG) emission calculation has been conducted, GHG emission reduction targets have been defined and the reduction of GHG emissions has been verified within an external 4C audit.

![Figure 14: 4C Climate Friendly Coffee logo](image)

10.4 Off-Product Communication

Off-product claims can be defined as any communication referring to 4C which is not directly related to a specific product. Such claims can be used for information about a successful certification (certificate holders), about the approval of certificates or the recognition by 4C (CBs) or regarding activities in close relation to 4C (e.g. projects). Off-product communication includes websites, e-mail signatures, brochures, leaflets, (annual) reports,
advancements, flyers, posters, displays, (news)letters, offerings, invoices, document templates, etc. Statements must be consistent and not misleading to market participants of the up- and downstream supply chain, consumers or other stakeholders.

10.4.1 Off-Product Logo Use

For off-product communication approved by 4C, the 4C logo can be used. The 4C logo consists of the number 4 and the letter C with a stylized globe symboling a coffee bean inside the C. The files of the 4C logo in the “original” colors (orange and green) and “neutral” colors (black or white) are provided by 4C. In case a company or organization would like to use the 4C logo in any other colour than the ones specified above, a request for approval must be send to 4C prior to its application. 4C will decide on the application of any other colour on a case-by-case basis.

![4C logo](image1)

Figure 15: 4C logo

The initials “4C” must be used with the correct reference to the 4C System. The 4C logo is a new version of the former 4C Association logo. It represents sustainability and the “for the coffee community by the coffee community” approach. The use of the 4C logo is meant to help users of the 4C System to signify 4C certified coffee and to communicate their efforts in pursuing sustainability in the coffee sector.

![Examples of 4C off-product logo use](image2)

Figure 16: Examples of 4C off-product logo use

The 4C logo will not be provided for internal company documents which could be misleading because they contain statements that are not directly related to the 4C certification and/or have not been verified by 4C. The 4C logo will also not be provided for the use on business cards.

Further information on the graphical implementation of the 4C logo is available in the 4C logo styleguide (Annex I).

10.4.2 Off-Product Claims

The following table shall be used as a guideline for off-product communication of the different stakeholder groups:

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### Requirements on claims

<table>
<thead>
<tr>
<th>Interest group</th>
<th>Requirements on claims</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Certificate holders</td>
<td>Claim shall refer to the certification, e.g. 4C certified.</td>
</tr>
<tr>
<td>2. Intermediary or Final Buyers</td>
<td>Claim shall refer to the traded 4C certified coffee, e.g. Company sources coffee that is produced in accordance with 4C Code of Conduct.</td>
</tr>
<tr>
<td>3. Certification Bodies</td>
<td>Claim shall refer to the cooperation, e.g. 4C-cooperating Certification Body.</td>
</tr>
<tr>
<td>4. Other third parties (e.g. project-related partner)</td>
<td>Claim shall refer to partnership or relationship with 4C, e.g. project was conducted together with 4C.</td>
</tr>
</tbody>
</table>

**Table 4: Requirements for off-product claims**

If 4C coffee is recognized by other sustainability standards as being equivalent, stakeholders may choose to apply a respective claim for the outgoing material (e.g. “SAI Silver Compliant”). Recognitions by other sustainability standards can be found on the 4C website. It is strongly recommended that stakeholders visit also the other standard’s website to research applicable and more specific requirements in order to implement these additional claims in a proper way.

### 10.5 On-Product Communication

#### 10.5.1 Introduction

On-product communication refers to all communication directly related to the final product, e.g. 4C logo and claims on final product packaging (for end consumers). In the 4C System, the FB, as well as a roaster operated by a certified ME or BP Producer, are the relevant stakeholders who will print the 4C logo or 4C related claims on the final product label. The compliance with the 4C System requirements is the basis for possible on-product claims on final products.

4C encourages companies to pack 100% 4C certified coffee into products bearing the 4C logo whenever possible. Additionally, all stakeholders should at all times strive to achieve 100% 4C certified coffee purchases. However, the 4C logo and 4C related claims can be applied, provided that the product contains at least 90% of 4C certified coffee. For the start of using the 4C logo and 4C related claims on pack, a minimum percentage of 30% 4C certified coffee must be contained in the package, with a maximum timeframe of three years to reach 90%.

The 4C logo must be used in combination with a disclaimer, in case the product contains less than 90% of 4C certified coffee. The disclaimer must clearly state the sustainable share of the product’s content in percent to improve transparency and avoid misunderstanding among end consumers. Further information on the formulation of disclaimers is provided in Annex II.
10.5.2 On-Product Logo Use and Claims

Stakeholders have to take into account the following rules on using the 4C logo on products:

- 4C logo shall not be positioned in any disadvantageous way; especially not if applied together with logos of other sustainability certification schemes.

- 4C logo and claims shall not be used in a misleading way, avoiding confusion and misunderstanding by stakeholders and loss of credibility of the 4C System.

- 4C logo and claims shall not be applied in a way that implies a connection between 4C and actions performed by the stakeholder that are outside of the certification scope.

- Stakeholders shall not use the 4C logo and claims to relate to product characteristics not covered by 4C certification in any kind of internal or external communication or marketing activities.

![Figure 17: Examples of 4C on-product logo use](image)

Further information on the graphical implementation of the 4C logo is available in the 4C logo styleguide (Annex I).
Annex I: Style Guide of the 4C Logo

Colors

The 4C logo is available in different digital formats in RGB, CMYK, positive and negative colour schemes. The 4C logo should preferably be used in the colour version. If this is not possible due to optical or graphical reasons, you may use the black or white version.

1. Color-version
   a. Orange (CMYK: 0 75 86 0; RGB: 235 90 43; Hex: #eb5a2b)
   b. Light green (CMYK: 53 0 55 0; RGB: 133 196 143; Hex: #85c48f)
   c. Dark green (CMYK: 80 29 57 42; RGB: 30 97 85; Hex: #1e6155)

2. Black-version (100%)

3. White-version (invers)

![4C logo colours]

Figure 18: 4C logo colours

In case a company or organization would like to use the 4C logo in any other colour than the ones specified above, a request for approval can be send to 4C prior to its application. 4C will decide on the application of any other colour on a case-by-case basis.

Opacity

The 4C logo must be used in 100% opacity and should not be used with reduced opacity.

![4C logo opacity]

Figure 19: 4C logo opacity

Size

It is possible to adjust the size of the 4C logo proportionally. The absolute minimum height allowed for on-product logos is 7.5 mm.
There is no minimum size expressed in units of length for web-based logo uses. However, the logo must have a reasonable size and be clearly visible.

Clearance area

The 4C logo should only be used where its independence and integrity are preserved. A required free space of 25% of the logo’s height shall be kept around the logo.

Please allow more space whenever possible.

Manipulation

The colors, formatting, opacity, proportion and text of the 4C logo should not be altered. Do not cut and / or use the elements of the 4C logo separately from each other, add shadows, effects, warp or rotate the 4C logo.
Dos and Don’ts in applying the 4C logo

<table>
<thead>
<tr>
<th>Dos</th>
<th>Don’ts</th>
</tr>
</thead>
<tbody>
<tr>
<td>&gt; Use only logo designs and graphical attributes that are provided by 4C (original graphics).</td>
<td>&gt; Add, amend or remove any part of the logo</td>
</tr>
<tr>
<td>&gt; Apply the logo in a noticeable area in your company catalogue/website/product etc.</td>
<td>&gt; Change colours or font</td>
</tr>
<tr>
<td>&gt; The clearance area for the logo should be kept</td>
<td>&gt; Use parts to re-design another logo</td>
</tr>
<tr>
<td>&gt; Choose the best logo colours that optimize visibility</td>
<td>&gt; Adapt proportions individually.</td>
</tr>
<tr>
<td>&gt; Keep at least the minimum size for on-product logos</td>
<td>&gt; Recreate shapes</td>
</tr>
<tr>
<td>&gt; Ask for approval before making use of the 4C logo on- and off-product</td>
<td>&gt; Include special effects or shadows</td>
</tr>
<tr>
<td></td>
<td>&gt; Border with shape</td>
</tr>
<tr>
<td></td>
<td>&gt; Integrate pictures or forms.</td>
</tr>
<tr>
<td></td>
<td>&gt; Disadvantageous size</td>
</tr>
<tr>
<td></td>
<td>&gt; Use the logo as a read-through object in texts</td>
</tr>
</tbody>
</table>

Table 5: Dos and Don’ts in applying the 4C logo
Annex II: Example Claims and Disclaimers

Examples of 4C claims for products containing 100% of segregated 4C certified coffee:

- Contains 100% 4C certified coffee
- 4C certified coffee
- Sustainable coffee certified based on 4C sustainability requirements
- Made from 4C certified sustainable coffee beans
- Made from coffee beans certified according to 4C requirements
- Coffee is made from 4C certified coffee beans.
- Coffee produced under responsible farming practices.
- The coffee in this package originates from sustainable sources.
- This product originates from a social, environmental and economic sustainable supply chain.
- This 4C certified coffee reduces deforestation / discrimination / child labour / …
- This 4C certified coffee comes from socially and environmentally responsible coffee farms

Examples of 4C disclaimers for products containing less than 90% (but a minimum of 30%) of segregated 4C certified coffee:

- Contains over 75% 4C certified coffee
- 30% certified coffee
- 45% sustainable coffee meeting 4C requirements
- With 50% certified coffee now, we’re working towards using 100% 4C certified coffee by (year)
- We are committed to use 100% 4C certified coffee, currently using 80% 4C certified coffee from sustainable sources
- Product contains sustainable coffee
Annex III: Examples of 4C Units

Examples of 4C Units:

Figure 23: ME is a dry mill and trader

Figure 24: ME is a cooperative.

Figure 25: ME is a cooperative. A trader can also own the milling operation.

Figure 26: ME is a cooperative. Warehouse and commercial department.