



4C System Update 11

12th August 2021

1. Clarification on Procedures for the 4C Chain of Custody (CoC) Certification

Please observe the following procedures for the Chain of Custody certification.

General

- The 4C CoC certification is voluntary. It could, though, be required by a FB as mandatory for all actors in its supply chain. Applicants should check this with the FBs to whom they sell 4C coffee, to confirm if the 4C CoC certification is required from them or not.
- Brokers are not eligible for 4C CoC certification, i.e., only companies that take ownership of 4C certified coffee are eligible for 4C CoC certification.

BPM

- The applicant for the 4C CoC certification must fill in the BPM version for IBs and FBs, available in the 4C website, and send it to an approved 4C cooperating CB.
- The BPM must list all companies, with their offices and facilities locations, used by the applicant to trade and/or handle 4C coffee on behalf of the applicant, either owned or subcontracted by the applicant. This means that while the applicant has the ownership of the 4C coffee lots, all offices and facilities used by the applicant to trade and/or handle 4C coffee, must be listed in the BPM, regardless of whether the office or facility is used by the applicant only sporadically or regularly.
- The term “handling” includes all activities described in the 4C Glossary for terms “Chain of Custody”, “Dry Mill” and “Post-harvest processing”. Therefore, the warehouses that handle 4C coffee on behalf of the applicant, must be marked with the role of “processor” in the BPM. The activity of “storage” is implicit to all “processors”, as explained in the guidance sheet of the BPM.
- The field “number of employees” in the BPM must inform how many employees are directly working with 4C coffee in each office and facility listed in the BPM, whether they are responsible for documentation or for the physical handling of 4C coffee batches.
- The CBs must verify that all offices and facilities actually used by the applicant, are in fact listed in the BPM.



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- Once it is verified that the BPM is correctly filled in, the rules for risk assessment, sample size calculation, and sample selection, described in the 4C System Regulations, must be followed to determine the sample to be audited. The offices and facilities listed in the CoC BPM are to be considered as equivalent to BPs Service Providers, and the applicant for the 4C CoC certification as equivalent to the ME, in the rules described in chapter 7 of the 4C System Regulations.

CBs

- The 4C cooperating CBs approved to carry out 4C CoC audits are listed in the 4C website. Those have the word “CoC” under the column of Certification Scope. For CoC audits, the column of Countries to Conduct 4C Audits is not applicable, since this is valid only for certification of coffee production, and not valid for CoC audits. The approved CBs for CoC audits may carry out CoC audits in any country.

Audit

- The CB must use the audit checklist specific for 4C CoC audits, available in the 4C website.
- The office locations and facilities which purely trade and store 4C coffee, i.e., marked only with the role of “storage” in the BPM may be audited remotely. All conditions and regulations for remote audits, specified in 4C System Update 9 issued on 4th March 2021, must be met, except for the force-majeure rule. As always, a positive certification decision must be based on the fact that the CB can assure compliance to all 4C requirements, and the security and reliability of data and information provided in the remote audit.
- The facility locations which handle 4C coffee, i.e., marked with the role of “processor” in the BPM must be audited physically.
- The audit procedures described above are valid for companies that have the ownership of the 4C coffee and for those that are outsourced, i.e., applies to all companies including those that generate the orders (for purchasing and handling) and the facilities that execute the orders.
- Outsourced offices and facilities must receive clear instructions from the 4C coffee owner, including traceability documentation and record keeping whether digital or paper, identification of the coffee batches to ensure physical segregation, information that must appear on invoices and other relevant 4C system requirements.





Abbreviations:

CoC = Chain of Custody

FB = Final Buyer

IB = Intermediary Buyer

BPM = Business Partner Map

CB = Certification Body

BP = Business Partner

ME = Managing Entity



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