



## 4C System Update 12

03 February 2022

1. Clarification on Guidance for Remote Audits
2. Clarification on Procedures for the 4C Chain of Custody (CoC) Certification and the Use of the Mass Balance Traceability Modality by FBs

### 1. Clarification on Guidance for Remote Audits

4C has published a guidance for remote audits in 4C System Update 9, issued on 4<sup>th</sup> March 2021. In addition to that guidance, please also take into consideration the following clarifications.

#### Compliance to 4C requirements in remote audits

We refer to the 5th bullet point under the “General conditions” section of 4C System Update 9, page 1, which says:

“A complementary on-site audit must be conducted as soon as the safety constraints or travel restrictions are no longer occurring, i.e. an on-site surveillance audit to verify what was not feasible to cover remotely or verify again check-points that could not be properly evidenced during the remote audit (e.g. visual inspections and interviews).”

We clarify that:

- A remote audit is only a type of audit method which is allowed by the 4C System exclusively under the conditions indicated in 4C System Update 9, and therefore must ensure the same level of compliance as an on-site audit. This means that all requirements to make a certification decision must follow the current rules provided in the 4C System Regulations v4.0 and relevant 4C System Updates. Thus, all major checkpoints of the respective compliance level being audited in a remote audit must be complied with, in order for a positive certification decision to be taken.
- The requirement related to conducting the certification audit during the harvest season must be complied regardless of the audit method, either remote or on-site.
- After conducting the remote audit, the CB must make the certification decision within the 60 calendar days deadline, as described in the 4C System Regulations v4.0 and issue the 4C certificate in case a positive certification decision is taken.



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### Sample to be audited in remote audits

We refer to the 2<sup>nd</sup> bullet point under the “Audit plan preparation and communication” section of 4C System Update 9, page 2, which says:

“The complete sample of BPs can be remotely audited. It is also possible to split the sample, i.e., part in the remote audit and part in the required on-site audit. However, the total sample size cannot be less than the minimum sample size calculated based on regular risk assessment applied for on-site audits.”

We clarify that:

- The complete sample of BPs is the total number of BPs Producers and BPs Service Providers, as described in the Chapter 7 of the 4C System Regulations v4.0.
- The ME and the complete sample of BPs must be audited before a certification decision can be taken. It is possible that a part of the complete sample be audited remotely, and the rest be audited on-site in the same audit, even though this audit has been registered as a remote audit. But the complete sample must be fully audited before the CB takes the certification decision.
- In the complementary on-site surveillance audit, which is required as a consequence of carrying out a remote audit, the CB can choose to either audit again the same full sample as in the remote audit or change the sample construction based on their risk assessment and on the results of the previous remote audit.

## **2. Clarification on Procedures for the 4C Chain of Custody (CoC) Certification and the Use of the Mass Balance Traceability Modality by FBs**

In addition to System Update 11, issued on 12th August 2021, please also take into consideration the following clarifications.

### Completion of the BPM by IBs participating in fully certified supply chains, including the FB

The warehouses used and appointed by the FB to receive 4C coffee do not need to be listed in the BPM of the IB, if the following conditions are present:

- The warehouse is already listed in the BPM of the CoC certified FB.
- During the IB's ownership of the 4C coffee while the coffee lot is stored in the respective warehouse, no handling activities occur on behalf of the IB.

Regarding repackaging, this activity is considered of low risk as long as it is not associated with grading and blending of batches. Therefore, warehouses that perform exclusively this handling activity should be marked only with the function of "Storage" in the BPM.





### Specific traceability requirements for IBs and FBs

The requirement regarding physical segregation of 4C coffee is valid until the ownership of the 4C coffee is transferred from the IB to the FB, as described in chapter 8.2 of the 4C System Regulations v4.0.

While the 4C coffee lot is still owned by the IB, physical segregation is mandatory and the 4C coffee lots are required to be identified and stored within the same lot but can share an area with coffee lots certified under other certifications, i.e. an exclusively dedicated warehouse floor to store just 4C coffee lots or a determined silo which will always receive only 4C coffee is not required (silos with 4C coffee should, at that moment, only contain 4C coffee in order to comply with the requirement on physical segregation). All packaging forms of a specific 4C coffee lot (bags, big bags, containers, bulk, etc.) are required to be identified.

After the ownership of the 4C coffee lot is transferred from the IB to the FB, handling of the respective lots on behalf of the FB by the warehouse where it is still stored, may take place. Among the handling activities, the physical blending of coffee lots, including the mass balance traceability modality, is allowed (i.e., blending 4C certified coffee with non-4C certified coffee). In case the FB decides to apply the 4C logo and/or 4C claims on-pack, physical blends based on the mass balance traceability modality must be in line with the requirements of chapter 10 (4C Logo Use and Claims) of the 4C System Regulations v4.0.

The term “handling” mentioned above is defined in System Update 11 and in the system document 4C Glossary.

#### Abbreviations:

BP = Business Partner

BPM = Business Partner Map

CB = Certification Body

CoC = Chain of Custody

FB = Final Buyer

IB = Intermediary Buyer

ME = Managing Entity

