



01 March 2024

# ASSURANCE AND CERTIFICATION MANUAL v1.1

SUSTAINABLE FIBRE ALLIANCE



## Introduction

The requirements in this document apply to conformity assessment bodies wishing to provide assurance and certification services for a standard within the scope of the SFA programme.

The scope of the SFA programme includes:

- The SFA Cashmere Standard and any of its predecessors that are still in effect, which applies to producers of 'SFA Certified' cashmere;
- The SFA Clean Fibre Processing Standard and any of its predecessors that are still in effect, which applies to industrial facilities that scour and/or dehair 'SFA Certified' cashmere;
- The SFA Chain of Custody Standard and any of its predecessors that are still in effect, which applies to all entities who take physical possession of 'SFA Certified' cashmere, up to but not including brands and retailers handling finished and labelled products.

All CABs shall follow the requirements of this document from its publication date.

In this document, the following terms are used to indicate requirements, recommendations, permissions, and possibilities or capabilities:

- "shall" indicates a requirement;
- "should" indicates a recommendation;
- "may" indicates a permission; and
- "can" indicates a possibility or a capability.

 *Indicates guidance. Guidance is not normative in and of itself, but may repeat, reinforce and/or clarify normative requirements.*

## References

### SFA programme documents

- [SFA Cashmere Standard](#)
- [SFA Clean Fibre Processing Standard](#)
- [SFA Chain of Custody Guidelines](#)
- [SFA Glossary](#)

### SFA web links

- [Conformity assessment bodies \(CABs\) approved to certify against the SFA standards](#)
- [Conflict of Interest Policy](#)
- [Certification Fee Schedule 2023](#)

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## Amendment record

Page No.	Context	Revision	Date
Version 1.0	Replacement of SFA Requirements for Conformity Assessment Bodies (CABs).	<p>Clarification of requirements.</p> <p>Removal of duplication.</p> <p>Restructure of document.</p>	01/11/2023
Version 1.1	Updates based on feedback during consultation.	<p>Duplication removed where accreditation to ISO IEC 17065:2012 was mentioned in requirements 8.1, 8.2 and 91.d. Now the reference only appears in 8.1.</p> <p>Table 1. added to clarify occupational competency requirements.</p> <p>New requirements 26.5 and 26.5.1 to encourage CABs to be proactive in stakeholder engagement when conducting audits.</p> <p>New requirements 4.3 and 4.4 that provide explicit rules regarding transfer of certificates and transaction-relevant data.</p> <p>Revised requirements 10.7.a.iv for all assessors to be subject to a shadow audit at least once a year.</p> <p>New requirement 10.7.a.viii for the CAB to identify and resolve differences in assessment decisions between assessors.</p> <p>Requirements 17.1.2.a and 17.1.2.b clarified to be less subjective.</p> <p>Requirements 32.2 and 32.2.1 added which were previously guidance.</p> <p>References to timescales of less than 12 months amended to the respective number of calendar days.</p> <p>CAB Approval section removed to the CAB Oversight Manual.</p> <p>Removal of jargon relating to personnel knowledge, training and/or experience.</p> <p>Reporting requirement 33.1 updated to include an aggregated list of all exemptions</p>	04/12/2023

		<p>granted.</p> <p>New requirement 1.4 clarifying that local law should take precedence.</p> <p>Requirement 1.8 updated to include 'or person'.</p> <p>Requirement 21.1 amended to clarify all transactions are to be audited.</p> <p>Previous requirements 21.2 removed which referred to sampling of transactions.</p> <p>New requirement 21.2 for CABs to accept TCs issued by ICCAW and/or SFA before 1 April 2024.</p> <p>New requirement 22.2 requiring The CAB to consult with the SFA before any claim is approved.</p> <p>New requirements 1.15 and 1.16 relating to rules about whistleblowing.</p> <p>New requirements 33.8 and 33.8.1 relating to a new reporting requirement for the CAB to produce a Certification Summary Report in addition to the Assessment Report</p>	
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## Review of this document

Concerns or comments on the design and/or implementation of this document or any other part of the SFA programme more broadly should be sent to [standards@sustainablefibre.org](mailto:standards@sustainablefibre.org). All concerns will be considered carefully, no later than when the formal review of this document starts within three years of the previous major version being published.

## General requirements

### 1. Service level standards

- 1.1. The CAB shall promptly carry out, in a competent and professional manner, all its activities related to the SFA programme.
- 1.2. The CAB shall promptly inform the SFA of any information received that is likely to impact the credibility of the SFA programme.
- 1.3. The CAB shall not engage in any activity that might bring the SFA into disrepute.
- 1.4. Where a requirement of this document contradicts law within a jurisdiction that the CAB operates the CAB shall ensure that local law takes precedence.

*This does not grant exemptions to the CAB when they are operating outside of that jurisdiction.*

- 1.5. The CAB shall not disclose to any other party, without written consent from the SFA, information obtained during the CAB's work for the SFA and will follow all appropriate privacy and data protection requirements as set out by the SFA.
- 1.6. The CAB shall contribute to scheduled standard reviews by providing the SFA with feedback on the CAB's activities related to the SFA programme.
- 1.7. The CAB shall have adequate arrangements (e.g., insurance or reserves) to cover liabilities arising from its operations and shall have the financial stability and resources required for its operations.
- 1.8. The CAB shall be a legal entity or person.
- 1.9. The CAB shall use English as its working language and ensure that all information shared with the SFA is in English.

*This means that the original documents and communications with the SFA shall be in English.*

- 1.9.1. Assessments and assessment reports may be done in the working language of the entity, but certification decisions shall be communicated in English.
- 1.10. The CAB shall not provide any other products or services that could compromise the confidentiality, objectivity or impartiality of its certification process and decisions. If the CAB also performs other activities in addition to certification, it shall apply additional measures to ensure that the confidentiality, objectivity and impartiality of its certifications are not affected by these other activities.
- 1.11. The CAB shall not produce or supply products of the type it certifies.
- 1.12. The CAB shall not give advice or provide consultancy services to the entity as to methods of dealing with matters that are barriers to SFA certification (e.g., non-conformances identified during the certification process).

*Explanations regarding the SFA standard(s) and its assurance or certification system are not considered to be advice or consultancy. General information or training may be provided if this service is offered to all standard users in a non-discriminatory manner.*

- 1.13. The CAB shall demonstrate that it seeks and achieves continuous quality improvement.
- 1.14. The CAB shall treat all people and cultures with equal respect and dignity.

*The CAB should take special care in this regard when operating in a country foreign to the one in which the CAB's head office is located.*

- 1.15. The CAB shall encourage all staff to report suspected non-conformities committed by the CAB against this document.
- 1.16. The CAB shall display a notice in prominent locations within staff common areas that includes:
  - a. Direction that all staff report suspected non-conformities committed by the CAB against this document to the CAB's oversight body;
  - b. the contact details for the CAB's oversight body;
  - c. reassurance that all reports to the oversight body made by staff are anonymous and the identity of any whistleblower(s) will not be shared with the CAB.

## 2. CAB availability and accessibility

- 2.1. The CAB shall ensure that its main contact email address for SFA-related queries is not left unattended for more than 48 hours.
- 2.2. CABs shall provide the SFA and oversight body (OB) with access to all assurance- and certification-related documentation and data when requested and in a timely manner.
- 2.3. The CAB shall direct all correspondence with the SFA to [standards@sustainablefibre.org](mailto:standards@sustainablefibre.org).

 *Where the CAB corresponds with individual SFA staff via email, the CAB should put [standards@sustainablefibre.org](mailto:standards@sustainablefibre.org) in carbon copy (cc).*

## 3. Responding to standard system updates

- 3.1. Where the SFA makes changes to SFA programme documents, the CAB shall:
  - a. Update the CAB's procedures and documents to reflect the changes;
  - b. Notify the entity of the nature of the changes and how they will affect the entity;
  - c. Notify the entity of when the changes come into effect.

 *Such changes may include requirements that will be withdrawn, replaced or updated.*

 *Where there are significant changes, the SFA will provide guidance and training materials explaining the changes.*

## 4. Coordinating with other CABs

- 4.1. The CAB shall cooperate with all other SFA-approved CABs to ensure the worldwide equal application of the SFA standard(s) assessment and certification procedures.
- 4.2. The CAB shall recognise certificates issued in accordance with the SFA standard(s) by other SFA-approved CABs.
- 4.3. The CAB shall fulfil data requests from other CABs for information relevant to the verification of transactions within 10 working days.
- 4.4. The CAB shall consider and resolve requests from other CABs to transfer an existing certificate issued by the CAB to the other CAB within 20 working days.

## Management system

### 5. Quality management system

- 5.1. The CAB shall have a quality management system that includes documented procedures for:
- a. Document control;

*This may be demonstrated by compliance with ISO 9001 or equivalent.*

- b. Registering and/or applying for assessments and certification against the SFA standards for which the CAB has been approved to provide assurance and certification services;
- c. Meeting the requirements of this document;
- d. The recruitment, selection, training and assignment of the CAB's assurance and certification personnel;
- e. Conducting conformity assessments, including assigning suitably qualified assessors to any given assessment teams and ensuring that the certification decision is made by personnel separate to the assessment team;
- f. Auditing transactions;
- g. Approving, monitoring and controlling the use of the SFA logo and general and product SFA claims;
- h. Any interested stakeholder to appeal certification decisions made by the CABs. This procedure shall function independently of and shall not undermine the scope of application of the SFA's Complaints and Dispute Resolution Procedure;

*Stakeholders are encouraged to follow the CAB's appeals process, then the SFA's Complaints and Dispute Resolution Procedure prior to initiating any other remedies, such as a legal action including lawsuit, injunction, request for declaratory relief or other claim or legal action against the SFA or its partners.*

- i. Any interested stakeholder to make a complaint about any aspect of the conduct of the CAB or its representatives. This procedure shall function independently of and shall not undermine the scope of application of the SFA's Complaints and Dispute Resolution Procedure;

*Where a complaint cannot be resolved outside of a formal process, the CAB or entity may submit a formal complaint to the SFA in relation to the SFA's standards, policies and procedures, members or activities.*

*Formal complaints shall be made in writing following the SFA's Complaints and Dispute resolution Procedure.*

*Stakeholders are encouraged to resolve matters involving SFA members using the member's own complaints procedure in the first instance. Where this avenue has been exhausted, stakeholders can contact the SFA's Assurance Manager to highlight their concerns. This should be done by email via [standards@sustainablefibre.org](mailto:standards@sustainablefibre.org).*

- j. Annual internal audits on SFA standard-related performance;

*It could perform management reviews and internal audits according to the type, range and volume of certification performed.*

- k. Reviewing the performance of their quality management system;
- l. Annual performance reviews of personnel responsible for evaluation, assessment and certification;

- m. The management of liability;
  - n. The CAB shall have a procedure for identifying, analysing, documenting, preventing and minimising conflicts of interest from the CAB's provision of certification, including any conflicts arising from the CAB's relationships with its entities;
  - o. Meeting the legal and regulatory requirements for the jurisdictions in which they operate.
- 5.2. The quality management system shall include an organisational chart showing lines of authority, responsibilities and allocation of functions.

 *The structure of the CAB shall demonstrate confidence in its certification operations. The organisation chart should identify the management (body, group or person) that has overall responsibility for the functioning of the CAB, including its finances.*

- 5.3. The CAB shall have an organisational chart describing the CAB's management structure.
- 5.4. The CAB shall ensure that the quality management system is understood, implemented, maintained and reviewed at all levels within the organisation for the delivery of the SFA requirements.

## Publicly available information

### 6. Public information on services

- 6.1. The CAB shall ensure its website contains accurate information relating to the CAB's assurance and certification operations, including:
- a. Contact details;
  - b. Accreditation status of the CAB;
  - c. The scope of SFA standards for which they are approved to offer assurance and certification services;

 *The CAB's approval scope can be found in their approval documentation and on the SFA website.*

- d. All programme documents related to the scope of SFA standards for which they are approved to offer assurance and certification services;

 *For these documents, the CAB may link to the SFA website.*

- e. The fee structure for the CAB's services;
- f. A description of the rights and duties of entities, including requirements and restrictions;
- g. The CAB's procedures for registering and/or applying for assessments and certification against the SFA standards for which the CAB has been approved to provide assurance and certification services;
- h. The CAB's procedures for conducting assessments and making certification decisions;
- i. The CAB's policies for data protection;
- j. The CAB's procedures for appeals against a certification decision;
- k. The CAB's procedures for complaints about any aspect of the conduct of the CAB or its representatives;
- l. The CAB's procedures where non-conformances with the certification requirements are detected.

### 7. Public information on entities certified by the CAB

- 7.1. The CAB shall keep its website updated with the information regarding its certified entities to include as a minimum:
- a. Name;
  - b. Address;
  - c. Contact details;
  - d. SFA Certified scope;
  - e. Product specifications;
  - f. Certification status;
  - g. Date of certificate expiry.

- 7.2. The CAB shall provide access to information to ensure confidence in the integrity and credibility of its certification, the following information:

 *Information can be provided through their websites, publications, electronic media, or other means.*

7.2.1.The SFA standard(s) and reference documents as provided by the SFA;

 *For these documents, the CAB may link to the SFA website.*

7.2.2.Information about the procedures for:

- i. Evaluating whether standard users meet the SFA's standard requirements;
- ii. When certification is extended;
- iii. Where non-conformances with the certification requirements are detected;
- iv. Handling general complaints and appeals against its certification decisions.

7.2.3.The fee structure for its services;

7.2.4.A description of the rights and duties of standard users, including requirements and restrictions.

## CAB accreditation and personnel

### 8. Accreditation of CABs

8.1. The CAB shall be accredited to ISO IEC 17065:2012 by an accreditation body that is a signatory of and in good standing with at least one of the following:

- a. International Accreditation Forum (IAF);
- b. EA (European co-operation for Accreditation);
- c. International Laboratory Accreditation Cooperation;
- d. Asia-Pacific Accreditation Cooperation;
- e. Inter American Accreditation Cooperation;
- f. African Accreditation Cooperation;
- g. Arab Accreditation Cooperation.

8.2. CABs shall comply with the legal requirements of the countries in which they operate.

### 9. Personnel

9.1. The CAB shall appoint an SFA Programme Manager who is responsible for communications between the CAB and the SFA, with responsibilities to include:

- a. Seeking SFA approvals;
- b. Supervising inspections;
- c. Assigning assessors;
- d. Coordinating the work of the SFA Certifier.

9.2. The CAB shall appoint an SFA Certifier (who may be the same person as the SFA Programme Manager) who is responsible for review, approval or rejection of the SFA audit reports and the final certification decision.

9.3. The CAB shall ensure that the SFA Certifier shall not make a certification decision where the SFA Certifier is directly involved in the assessment.

9.4. The CAB shall employ sufficient personnel competent to perform assurance and certification functions related to SFA standards and operate its system in a timely fashion.

9.5. The CAB shall ensure that individual personnel have knowledge, training and/or experience relevant to their role within the assurance and/or certification of SFA standards as per table 1, that is:

 *The CAB can ensure that each team member has knowledge, training and/or experience relevant to their role.*

- a. Sufficient;
- b. Current;
- c. Relevant to the scope of the respective SFA standards.

**Table 1 – Examples of Occupational Competencies**

		Applies to SFA Standard		
Competency	Example	Cashmere Standard	Clean Fibre Processing	Chain of Custody
Animal welfare	Degree in Agriculture (livestock production) or Veterinary Medicine	X		
Decent work/ social impact	SA8000 or equivalent	x	x	
Environmental management	ISO 14001 or equivalent, Degree in Environmental Management, Degree in Agriculture (crops), Waste Management, Biodiversity Conservation, Reforestation, or Water Resource Management	x	x	
Textile processing	Degree in Textile Engineering (Chemistry, Dyeing etc.)		x	
Supply chain management	ISO 28001 or equivalent	x	x	x
Quality system/data management	ISO 9001 or equivalent ISO 27001 or equivalent	x	x	x

9.6. The CAB shall require personnel involved in the assurance and certification process to:

- a. Commit themselves to observing the policies and procedures of the CAB;
- b. Declare any prior or present association with an entity seeking assessment or certification to which it is to be assigned to perform assessment or certification procedures.

 ***Conflict of Interest policy.***

9.7. The CAB shall ensure that personnel involved in assurance and certification have up-to-date technical knowledge in their respective fields of activity to enable them to conduct evaluation and certification effectively and uniformly.

In particular, the CAB shall:

 ***Certification Personnel includes inspectors and other certification personnel, including members of certification committees.***

- a. Annually review the competence of its personnel considering their performance to identify training needs for each approval scope in which the personnel will be assigned, including:
  - i. New assessors receive training of on-site assessment and undergo an on-site approval period accompanying on-site assessments while under the supervision of a shadow or lead assessor;
  - ii. All assessment decisions of new assessors are countersigned by a shadow or lead assessor until they have successfully completed their approval period;
  - iii. For each competency, at least three assessments by new assessors are accompanied by a shadow or lead assessor before a new assessor can make assurance recommendations alone;

- iv. For each competency, at least one assessment by each assessor is accompanied by a shadow or lead assessor;
- v. The shadow assessor may take over the conduct of an assessment if it is determined to be necessary for the successful completion of the assessment;

- *In this case, the assessor being evaluated has not met the requirement for a shadow assessment.*

- vi. Certificate decision-making personnel have sufficient knowledge, training and/or experience to make an informed decision on the outcome of an assurance activity;
  - vii. Provide training on assurance and certification processes, methodologies, activities and other relevant standard requirements;
  - viii. All assessors participate in activities that identify and resolve differences of understanding between assessors, where assessors would have been expected to come to similar recommendations.
- b. Participate in all relevant training offered by the SFA.

## 10. Assessment team

10.1. The CAB shall ensure that all assessors satisfy the following knowledge, training and/or experience requirements:

- a. Evidence of one of the following options for professional experience:
  - i. Tertiary education (college/university qualification) in a relevant discipline and one year of occupational experience in the subject area(s) to be assessed; or
  - ii. Secondary education (high school diploma) and two years of occupational experience in the subject area(s) to be assessed.
- b. Completion of a course/qualification on auditing/assessment techniques;
- c. Demonstrated knowledge of the SFA standard scope(s) for which they wish to perform conformity assessments as per table 1;
- d. Demonstrated knowledge of:
  - i. The CAB's procedures;
  - ii. The general context of the entity to be assessed;
  - iii. The general production methods and/or processes applicable to the organisations to be assessed;
  - iv. The preparation of written assessment reports that are clear, accurate and complete, and which articulate the assessment findings in relation to the SFA standard(s) and other applicable requirements.

10.2. The CAB shall ensure that all shadow assessors (assessors evaluating other assessors) are compliant with the requirements of 10.1.

10.3. The CAB shall ensure that all assessors are:

- a. Independent of the organisation being assessed;
- b. Not involved in the certification decision for the assessment.

## 11. Certification team

- 11.1. The CAB shall ensure that all certification decision-makers satisfy the following competence requirements:
- a. Either:
    - i. Current assessor/auditor qualification and knowledge, training and/or experience of the relevant standard scope(s) as per table 1 (preferred option); or
    - ii. Meets the requirements of 10.1 a, c, and d.
  - b. Knowledge of:
    - i. The CAB's procedures for certification decision-making;
    - ii. The relevant SFA standard(s) and all relevant related documents, interpretations and guidance;
  - c. Have completed a minimum of three certification decisions under the supervision of an experienced certification decision-maker.
- 11.2. The CAB shall ensure that all certification decision-makers are an employee of the CAB or one of its fully or majority-owned subsidiaries.

## Subcontracting

### 12. CAB responsibilities regarding subcontractors

- 12.1. The CAB may subcontract (i.e., outsource) assurance activities related to measuring compliance with SFA standards to an external body.
- 12.2. The CAB shall not subcontract or outsource any part of the certification decision.
  - 12.2.1. The CAB shall notify the SFA within five working days about the subcontracting body and the kind of subcontracted work they will be undertaking.
- 12.3. Where a CAB subcontracts any part of the assessment process, the CAB shall have a management system that describes the procedures to be followed by the CAB to ensure compliance by the subcontractors with the relevant requirements and to demonstrate that the subcontractor is competent to carry out the task for which it has been engaged.
  - 12.3.1. Where the CAB subcontracts any part of the assurance process, the CAB shall ensure that all external parties sign a legally binding contract that covers:
    - a. Subcontracted assurance activities;
    - b. Confidentiality;
    - c. Personnel competence;
    - d. Conflicts of interest.
- 12.4. Where the CAB subcontracts any part of the assurance process, the CAB shall:
  - a. Take responsibility for such subcontracted work;
  - b. Directly hold the certification agreement with the standard user and keep final responsibility for the granting, maintaining, renewing, extending, suspending or withdrawing of certification;
  - c. Ensure that the subcontracted body is compliant with the requirements of this manual;
  - d. Review all communication of the external body about the subcontracted work and check that it is accurate;
  - e. Implement corrective actions for any breaches of the contract or other requirements related to the subcontracted work;
  - f. Inform the entity in advance of outsourcing activities, with sufficient time for them to object.

 *This is to provide the entity with an opportunity to object.*

- 12.5. The CAB shall maintain documented procedures for the assessment and monitoring of the subcontractors:
  - a. Ability to fully conform to the requirements that are placed on the CAB itself with respect to the task contained within the subcontract;
  - b. Personnel to ensure they are:
    - i. Occupationally competent and experienced;
    - ii. Not involved, either directly or through any other employer, with the operation, process or entity that is subject to assessment in any way that may compromise impartiality.

12.6. The CAB shall ensure that interpreters or technical experts utilised in the assurance of the SFA standards have declared any affiliations with the entity being assessed.

## Planning for assessment

### 13. Contracting with entities

- 13.1. The CAB shall not enter into any contract with any entity not recognised by the SFA, as evidenced by a registration certificate.
- 13.2. The CAB shall not issue certificates to any entity not recognised by the SFA, as evidenced by a registration certificate.
- 13.3. As part of contracting, the CAB shall provide the entity with an up-to-date description of the procedures to be applied for conducting assurance and certification.
- 13.4. As part of contracting, the CAB shall inform the entity about:
  - a. Its contractual conditions, including fees and possible contractual penalties;
  - b. The entity's rights and duties, including the right to appeal with reference to the CAB's appeals procedure;
  - d. The current version of SFA standard(s) and corresponding relevant documents released by the SFA;
  - e. Programme changes, including regular updates of procedures and standards;
  - f. The evaluation and assessment procedures applied by the CAB during certification.
- 13.5. The CAB shall have an auditing and certification agreement with the entity that shall specify the terms of the contract, including:
  - a. That the SFA is not responsible for costs associated with conformity assessment of certification;
  - b. That the SFA has the right to change the standard and/or process of certification at its discretion; and
  - c. A commitment on the part of the entity to comply with the relevant indicators in the SFA standard(s), the Labelling and Licensing Guide where claims of 'SFA Certified' are made and other provisions of the SFA standard(s) as provided by the SFA;
  - d. A commitment on the part of the entity to allow the CAB, the SFA and the OB access to all sites covered by the scope certificate, including to sites where no 'SFA certified' products are processed, stored or administered, if applicable, and to all relevant documentation and records, including financial records;
  - e. A commitment on the part of the entity that in the event of suspension or removal of certification, the entity discontinues its use of all advertising matter that contains any reference to it and acts as required by the certification procedure (e.g., the return of certification documents);
  - f. A commitment on the part of the entity to keep records of all complaints received related to compliance with SFA standards and make these records available to the CAB and/or the SFA on request, to take appropriate action about such complaints and any related deviations to the certification requirements found and to document the actions taken;
  - g. A commitment on the part of the entity to inform the CAB, without delay, of any information or changes that may affect its ability to conform with the requirements of the standard(s) against which the entity is certified;

- h. A data-sharing agreement that allows the CAB to exchange information with other approved CABs, National Accreditation Bodies and the SFA as related to the SFA programme;
- i. A commitment on the part of the entity that it does not and will not hold certification for any SFA standard with more than one CAB at a time.

## 14. Defining the scope of the certificate

14.1. The CAB shall define the scope of the entity including:

- a. The SFA standards against which the entity is seeking certification;
- b. The location of the entity's management office;
- c. A list of all the physical sites at which the entity performs the activities for which the entity is certified.

14.2. Sites may be added to an existing scope certificate following an audit of that site by a CAB.

14.2.1. The entity may remove one or more sites from a scope certificate by giving the reason for removal and 10 working days' notice in writing to the CAB and the SFA.

 *Notice to the SFA is given via [standards@sustainablefibre.org](mailto:standards@sustainablefibre.org).*

## 15. Pre-assessment

15.1. The CAB shall not carry out an on-site assessment before the entity has completed a risk assessment for each of the sites proposed to be listed on the entity's scope certificate.

## 16. Risk assessments

16.1. The CAB shall complete a risk assessment of the entities certified against the SFA Cashmere Standard and/or SFA Clean Fibre Processing Standard using the risk matrix for entities provided by the SFA.

16.1.1. The CAB shall grade an entity as high risk where one or more of the following applies to the entity:

- a. The entity has prior criminality or evidence of wilful wrongdoing;
- b. There has been a suspension or removal of other certificates that included any of the sites that are part of the new certificate;
- c. The entity has open non-conformances;
- d. It is the entity's first certificate;
- e. The entity is an organisation or company created in the last 12 months;
- f. The entity's last assessment was a remote assessment.

16.1.2. Where the entity has not been graded as high risk, the CAB shall grade it as medium risk where one or more of the following applies to the entity:

- a. The entity relies on verbal, anecdotal, disaggregated and/or incomplete evidence/records;
- b. The entity has experienced a turnover of personnel in the last year that is greater than 20% of all staff;
- c. The entity is comprised of more than 25 sites;
- d. The entity operates over multiple jurisdictions;

- e. The entity has resolved non-conformances in the last three years;
- f. The entity contains sites that have been added to the entity since its last assessment;
- g. The entity contains sites that involve an organisation or company created in the last 12 months.

 *Risk assessments are done to determine whether an entity is considered low, medium or high risk, which affects sampling.*

 *Risk ratings for entities affect the number of surveillance audits an entity shall have.*

16.2. The CAB shall complete a risk assessment for each site that it assesses using the risk matrix for sites provided by the SFA.

- a. High – where red flags or medium risks are likely to manifest;
- b. Low – not the above.

## 17. Conditions for on-site and remote assessments

17.1. The CAB shall carry out assessments on-site.

17.1.1. Where it is not possible to conduct an assessment on-site, the CAB may do the assessment remotely, provided the following:

- a. The CAB can justify why the remote audit is needed;

 *This could be due to the official publication of travel restrictions due to a pandemic.*

- b. The CAB gains written confirmation that the entity agrees to a remote assessment and the proposed methods for conducting it;
- c. The appropriate technology is available to share required documentation and connect the CAB staff directly with the entity's staff or stakeholders;

 *For example, equipment, internet connection and bandwidth, and the skills needed by the entity for them to effectively participate.*

- d. Full confidentiality, security and data protection are ensured for all data shared during the assessment;
- e. The risk assessment also includes a section that identifies areas that cannot be assessed by remote assessment alone and mitigation actions undertaken;
- f. An on-site assessment will be done as soon as possible.

17.1.1.1. The remote assessment can be partial or full.

## 18. Time and place of assessment(s)

18.1. The CAB shall ensure that assessments are done at a time and place relevant to the standard requirement of interest.

 *For example, assessments of harvests should be done in spring and assessments of cold weather shelter should be done in winter.*

18.2. Conformity must be demonstrated by full assessment at intervals determined by the SFA standard(s) against which the entity is being assessed:

- a. This is every three years for the SFA Cashmere Standard and its predecessors;
- b. This is every three years for the SFA Clean Fibre Processing Standard;
- c. This is every one year for the SFA Chain of Custody Standard.

18.3. The CAB shall not issue certification to an entity that does not demonstrate compliance within two years of the date of registration with the SFA.

*If an entity has not met the relevant requirements within two years of registering, it will be required to withdraw and reapply for assessment.*

18.4. For medium-risk entities certified against the SFA Cashmere Standard and/or SFA Clean Fibre Processing Standard, the CAB shall conduct one surveillance assessment in the second or third year of the entity's certificate.

*This means one surveillance audit in total.*

18.4.1. The surveillance assessment shall cover all requirements potentially affected by the reasons that the entity does not have a low-risk rating.

18.5. For high-risk entities certified against the SFA Cashmere Standard and/or SFA Clean Fibre Processing Standard, the CAB shall conduct two surveillance audits in the second and third year of the entity's certificate.

*This means two surveillance audits in total.*

18.6. A surveillance audit shall not be conducted within 180 calendar days of an initial or recertification assessment or another surveillance audit.

18.7. Where the CAB is made aware of a credible complaint against an entity or information in the public domain that threatens the integrity of the SFA's Standard System, the CAB shall conduct a monitoring assessment as part of its investigations.

*Monitoring assessments are conducted in addition to the entity's scheduled surveillance assessments.*

18.7.1. The monitoring assessment shall cover all requirements related to the nature of the credible complaint.

## 19. Communication with entity ahead of assessments

19.1. The CAB shall provide the following information in writing to the applicant ahead of the assessment:

- a. The requirements of the relevant standard(s);
- b. The date of the assessment;
- c. Name of the assessor(s);
- d. The site(s) of the assessment;
- e. Who needs to be available for the assessment and their role;
- f. What will be covered during the assessment – opening/closing meetings, site tour, etc.;
- g. Length of assessment;
- h. How evidence shall be recorded and data protection;
- i. Grievance and complaints process for both the CAB and the SFA.

## 20. Sampling of entities and sites during assessments

20.1. The CAB shall assess 100% of entities.

20.2. The CAB shall assess 50% of sites that are high risk.

20.3. The CAB shall assess a random sample of at least 10% of sites marked as low risk.

- *Randomly means that every site has an equal chance of being sampled within their strata.*
- *Where an entity is being assessed against the SFA Chain of Custody Standard at the same time as another SFA standard, the sample of sites selected for Chain of Custody audits can be the same as the sample of sites selected for the other SFA standard. The random selection of each sample does not need to be done independently.*

20.3.1. The CAB may stratify its sample of low-risk sites, but sampling must be random within any strata.

20.4. The CAB shall produce a sampling strategy that documents and justifies its process for determining how sites are chosen for sampling.

i. Cost cutting and time saving shall not be used as justification for any stratification that results in some sites being more likely to be audited than others;

ii. The CAB shall review its sampling strategy annually.

20.5. The CAB must produce an annual sampling plan based on its sampling strategy to determine which entities and sites shall receive an assessment when, what type of assessment they shall receive (e.g., on-site, remote etc.) and who shall conduct the assessment.

## 21. Auditing of transactions

21.1. The CAB shall audit all transactions within 30 calendar days of the entity submitting the details of a transaction.

■ *This means auditing the transaction and entity against the requirements for transactions and quantity reconciliation in the version of the SFA Chain of Custody against which the entity is certified.*

■ *The CAB should use all available data, including transaction receipts submitted to the SFA and any other associated company invoices and shipping and customs documents the entity may possess.*

21.2. The CAB may recognise transactions verified by the SFA and/or the International Cooperation Committee of Animal Welfare (ICCAW) before 1 October 2024 as evidence of valid transaction inputs.

■ *This includes Transaction Certificates issued by the SFA and/or the International Cooperation Committee of Animal Welfare (ICCAW).*

## 22. Auditing of claims

22.1. The CAB shall audit all claims within 30 calendar days of the entity requesting approval for a claim.

22.2. The CAB shall consult with the SFA before any claim is approved.

■ *This means auditing the claim and entity against the requirements for claims in the version of the SFA Chain of Custody against which the entity is certified.*

■ *The CAB should use all available data, including transaction receipts submitted to the SFA and any other associated company invoices and shipping and customs documents the entity may possess.*

## Assessments

### 23. Application of requirements and scoring

- 23.1. The CAB shall apply the requirements of the standard without any limitations and without any additions or reductions.
- 23.2. The CAB shall apply standard requirements to the entity as a whole, including every site sampled that is operated by the entity and any sites sampled that are operated by a subcontractor acting on behalf of the entity.

 *For more information on sampling, see sections 20, 21, and 22.*

- 23.3. The CAB shall only certify entities that comply with all the requirements of the SFA standard(s) against which the entity has been assessed after any non-conformances recorded during the assessment have been closed.
- 23.4. The CAB shall only recertify entities that conform with either:
  - a. All of the improvement indicators of the SFA standard(s) against which the entity has been assessed, if any; or
  - b. All the improvement indicators of the SFA standard(s) against which the entity is being assessed, if any, that they were assessed to be compliant with at their last assessment and a minimum of three additional improvement indicators of the SFA Standard(s) against which the entity is being assessed, if any, that they were assessed to be not compliant with at their last assessment.
    - iii. The CAB shall determine whether a certificate against the SFA Clean Fibre Processing Standard is bronze, silver and gold certification according to the Awarding Criteria in the SFA Clean Fibre Processing Standard.

### 24. Conducting the assessment

- 24.1. The assessor shall conduct direct observation and questioning of the policies, systems, procedures and processes relevant to the elements of the scope being assessed.
- 24.2. The assessor shall verify documented evidence.
- 24.3. The assessor shall conduct interviews with concerned/authorised employees and management.
- 24.4. The assessor shall collect and examine all evidence related to the requirements.

 *Types of evidence include but are not limited to work products, formal questioning, witness testimony, photographs and videos.*

- 24.5. The assessor shall submit a documented report (the assessment report) to the CAB on the assessment findings within the 30 calendar days following the assessment.
- 24.6. The assessor shall provide a copy of the assessment report to the entity assessed within the 30 calendar days following the assessment taking place.
- 24.7. Where an assessor is joined during an assessment by anyone not part of the assessment team, the names and affiliations of those people shall be recorded in the assessment report(s).

 *The assessor and the CAB shall ensure that those people take no part in the recommendation or decision making of the certification.*

## 25. Certification decisions

- 25.1. The CAB shall use the Scope Certificate template provided by the SFA.
- 25.2. The CAB shall not issue certification to any entity that does not demonstrate conformity through full assessment against the requirements of the SFA standard(s) against which the entity is being assessed.

 See Introduction for the list of SFA standards.

 The CAB has full and sole responsibility for granting, maintaining, extending, suspending and removing certification.

- 25.3. The CAB shall not issue certification to an entity that does not demonstrate compliance within two years of the date of registration with the SFA.

 If an entity has not met the relevant requirements within two years of registering, it will be required to withdraw and reapply for assessment.

- 25.4. The CAB shall make certification decisions within 60 calendar days of the assessment taking place.
- 25.5. The CAB shall not make a decision before publishing a draft decision as a public notice on their website for 30 calendar days.
- 25.5.1. This public notice shall invite comments via email directly to the CAB from any interested stakeholder.
- 25.6. The CAB shall ensure that each decision on certification is made by (a) person(s) or committee different from the one(s) that carried out the assessment.
- 25.7. The CAB shall ensure that documentation of certification decisions includes:
- The basis for the decisions;
  - The decision;
  - Consequences.
- 25.8. For decisions where certification is approved, the CAB shall issue official certification documents to each certified entity within 90 calendar days of the assessment taking place.
- 25.9. Following a certification decision, the CAB shall notify the entity, all stakeholders who submitted comments and the SFA of the decision in writing.
- 25.10. The CAB shall ensure that the validity period of the scope certificate must not exceed:
- 36 months from the date of issue for certificates against the SFA Cashmere Standard and the SFA Clean Fibre Processing Standard;
  - 12 months from the date of issue for certificates against the SFA Chain of Custody Standard.

## 26. Claims

- 26.1. In accordance with the SFA Chain of Custody Guidelines and SFA Visual Brand Guidelines, the CAB shall:
- Issue Licensing Agreements and Conformity Mark Licences;
  - Exercise control over ownership, use and display of licences, certificates and logos that it can authorise certified entities to use;
  - Conduct follow-up activities on entities who have had certification removed or suspended to monitor cessation of claims;

- d. Review and approve the intended use of the 'SFA Certified' logo and labelling by certified entities in advance of the claim being made.

 *This must be done for each individual claim that uses different artwork and/or text and/or is for a different batch of products.*

## Incentivising improvement

### 27. Non-conformance classifications

27.1. Where an entity does not meet a requirement of the standard against which the entity is being assessed, the CAB shall issue a non-conformance to the entity.

27.1.1. Non-conformances can be critical, major or minor.

27.2. Where an entity has met a requirement of the standard against which the entity is being assessed but attention is needed to prevent a lapse of either performance, discipline or control, which could/would lead to a non-conformance in the future, the CAB may offer guidance to the entity on this matter.

 *The CAB may also offer guidance on how the entity could exceed the requirements of the standard.*

### 28. Conditional conformance

28.1. Where major non-conformances are determined by the CAB, the CAB shall take the appropriate action.

28.1.1. Appropriate action shall include one or more of the following:

- a. Continuation of certification under conditions specified by the CAB;
- b. Where the non-conformance is systemic, the CAB shall apply conditions to the entity and all its sites as a whole;
- c. Where the non-conformance is not systemic, the CAB shall apply conditions to at least the site(s) affected;
- d. Reduction in the scope of certification to remove non-conforming SFA standard components.

28.1.1.1. Where a non-conformity site has been removed from a scope certificate in this way, the CAB shall either:

- a. Grade the entity as high risk if the site that was removed was graded as low risk;
- b. Grade the entity as medium risk if the site that was removed was graded as high risk.

28.1.2. Where removal of non-conforming sites from a scope certificate indicates a systemic issue, the CAB shall either:

 *This supersedes 28.1.1.1*

- a. Suspend the certification pending remedial action by the applicant; or
- b. Remove the certification.

### 29. Inconsistencies in transactions

29.1. Where quantities of outputs for any product contained within any transaction cannot be reconciled to within a margin of 5% of the quantity of inputs, the entity shall be suspended.

29.2. Where quantities of outputs for any product contained within any transaction exceed the quantity bought and cannot be reconciled to within a margin of 5% of the quantity of inputs, the entity shall have its certification removed.

 This requirement supersedes 26.1.

## 30. False claims

- 30.1. Where the CAB has found a claim to be misleading, the CAB shall suspend the entity until all instances of the claim have been removed or for 90 calendar days if the CAB determines that the claim cannot be removed.
- 30.2. Where the CAB has found an entity to make claims that are intentionally false or to make claims that are repeatedly misleading, the entity shall have their certification removed.
- 30.3. Suspension or removal of certification
- 30.4. The CAB shall state in writing to the entity the reasons for denial, suspension or removal of certification with clear reference to the SFA standard(s) requirement or other certification requirement violated.
- 30.5. The certificate suspension or removal shall commence from the date of the CAB's communication about the certificate's suspension, withdrawal or termination to the entity.
- 30.6. The CAB shall not permit transactions or claims involving 'SFA Certified' fibre by an entity whose certification has been suspended or removed.

 *If certification is suspended and the certificate is later reinstated, the standard user is allowed to sell the entire product in stock that was harvested, purchased or processed during the suspension period as 'SFA Certified', subject to inventory verification by the CAB.*

 *This means that the CAB shall not approve any claims by the entity to sell products with 'SFA Certified' from the moment the CAB notifies the entity about the suspension or removal of its certification. This suspension could extend to any previously approved claims, making them null and void until the suspension is lifted.*

- 30.7. Where certification is suspended or removed, the CAB shall immediately inform the SFA of the suspension, removal or termination of certification.

## 31. Suspension of certification

- 31.1. The CAB shall deny or suspend the certificate of an entity when:
  - a. A critical breach is identified during assessment;

 *The CAB shall immediately notify the SFA of all critical breaches and major non-conformances, including details of the non-conformance.*

- b. It is not fulfilling clauses of the contractual agreement with the CAB;
    - c. The CAB decides to suspend a certificate holder's certificate before or at any point during an investigation or assessment if there is enough evidence of a potential systemic non-conformance.
- 31.2. The CAB shall enact the suspension within a maximum of five business days from the day the critical breach was identified, even if the entire assessment has not yet been completed.
  - 31.2.1. The suspension will last up to a maximum of 120 calendar days.
- 31.3. In the case of major non-conformances, the CAB shall withhold or suspend certification until implementation of corrective actions has been demonstrated.

## 32. Removal of certification

- 32.1. The CAB shall deny or remove the certificate of an entity:

*The SFA reserves the right to request the CAB to suspend or cancel a certificate when a case involving one or more critical breaches has been proven in a court or when a case can potentially cause significant harm to the reputation of the SFA.*

- a. Where critical breaches have not been rectified within the agreed timescale;

*In cases where reasons for denial or removal of certification include critical breaches, the CAB shall immediately notify the SFA with details of the entity's breach.*

- b. If a suspension is not lifted within the time allocated by the CAB;
- c. When the entity rejects an unannounced assessment without a reason that is out of their control;
- d. Where the entity does not fulfil clauses of the contract with the CAB, leading to cancellation of the contractual agreement;
- e. When the re-certification assessment was not carried out while the certificate was valid;
- f. When the certified entity voluntarily requests the cancellation of its certificate.

32.2. The CAB may conduct a recertification assessment to reinstate a certificate that was removed, subject to the entity's application and status.

32.2.1. The CAB shall investigate and determine the reason(s) for voluntary cancellation by the entity within 90 calendar days.

*Entities whose certificate was removed due to critical breaches after an assessment and who wish to renew the certificate may apply for a reassessment at any time.*

*Entities who voluntarily request the cancellation of their certificate and who wish to renew the certificate may apply for a reassessment at any time.*

32.3. Where certification has been removed, the CAB shall not process an entity's application for recertification for at least:

*Where certification has been denied or removed, the entity will be considered out of scope and a successful reassessment will be required before any claims will be considered.*

- a. One year in the case of non-compliance with red flag requirements;
- b. Three years if the entity exerted coercion or made any form of implicit or explicit threats to the moral or physical integrity or the life of any members of the CAB assessment team or staff, through the employees of the entity, or people under its influence or orders;

*There should be evidence of coercion or threats in the form of a witness report, a written report on the outcomes of an investigation, or a police report where a crime was reported.*

- c. For a maximum of three years, if the entity participated in illegal, fraudulent or unethical activities that could discredit the certification programme.

*Entities that have had certification removed and wish to rejoin the certification programme will have to reapply and declare as part of their application any sites included in the application that have been included in any previous certificates.*

## Reporting

### 33. Reporting requirements

- 33.1. The CAB shall provide a report to the SFA for each calendar month. The emailed report shall include:
- a. PDF copies of all scope certificates issued in the reporting month;
  - b. An aggregated list of all entities that your CAB has audited and certified on behalf of the SFA to date. The aggregated list should include the following information as a minimum:
    - i. Entity name;
    - ii. Country of audit;
    - iii. Certificate number;
    - iv. Certificate issue date;
    - v. Certificate expiry date;
    - vi. Certificate scope – product(s);
    - vii. Certificate scope – process category(ies);
    - viii. Withdrawn entities and the reason for withdrawal.
  - c. An aggregated list of all transactions that have been audited, including:
    - i. all data contained within each transaction; and
    - ii. the outcome of the CAB's audit of that transaction.
  - d. An aggregated list of all exemptions granted
  - e. An aggregated list of where an exemption was granted on the basis of requirement 1.4.

 *An aggregated list means an editable database, e.g., Microsoft Excel, csv, etc.*

33.2. The CAB shall ensure that the report is sent to the SFA within 10 working days after the end of the reporting period.

33.3. The CAB shall produce an annual report for the SFA that includes:

- a. A list of site-level audits that were done, indicating for each audit:
  - i. The site audited;
  - ii. The entity to which the site belongs;
  - iii. The date(s) of the audit;
  - iv. The identity of the assessor(s)/auditor(s);
  - v. Whether the audit was for an initial assessment, reassessment, surveillance or monitoring;
  - vi. Whether the audit was remote or on-site;
  - vii. The risk rating of the site as determined by the entity;
  - viii. Any changes to the risk rating of the site as determined by the CAB.
- b. A list of the total number of sites for each entity the CAB certifies;

- c. A description and justification of any variations to their sampling strategy for any sampling done in the preceding year;
- d. Details of any changes the CAB intends to make to its sampling strategy;
- e. A review of the effectiveness of previous changes to sampling strategy, as detailed in any previous reports;
- f. The results of any internal audits related to the performance of SFA standards;
- g. Any conflicts of interest identified and actions taken in response;
- h. Any changes to the CAB's personnel.

*Examples could include, but are not limited to, if the Responsible Officer is replaced, if the main SFA contact changes, if a member of the assessment team leaves, if legal proceedings or disciplinary proceedings are enacted against the CAB, or if the CAB is subject to suspension or removal of accreditation for other standards.*

33.4. The CAB shall report all data related to a certification decision to the SFA within 30 calendar days of the decision being made.

*This can be compiled and delivered as a monthly report.*

33.5. The CAB shall report the suspension or removal of any certificates or sites from any certificate to the SFA within 10 calendar days.

33.6. The CAB shall inform the SFA of any changes to personnel responsible for delivering assurance and certification services relating to SFA standards within 10 working days.

33.7. The CAB shall inform the SFA of any changes to the location of any publicly available SFA-related information within 10 calendar days.

*This refers to websites and ensures that the SFA has updated links to all content.*

33.8. For every decision made by the CAB on whether an entity is to be certified or not the CAB shall produce a report that contains:

- a. A justification for the decision that was made;
- b. A list of non-conformities and any associated actions and their completion dates;
- c. Any objections or complaints made to the CAB about the entity or its certification;
- d. Feedback to the SFA on any challenges experienced during the course of the certification process.

*This report shall be in English as per 1.9.1.*

33.8.1. The CAB shall share this report within 30 calendar days of the decision being made.

## Record keeping

### 34. Record-keeping requirements

- 34.1. The CAB shall maintain an up-to-date system of records to demonstrate how each of the requirements of this document has been met.
- 34.2. The CAB shall maintain full records related to contracting, assurance and certification for each of its clients.
- 34.3. The CAB shall maintain records on exemptions granted, appeals, complaints and actions taken in response to exemptions, appeals and complaints.
- 34.4. The CAB shall maintain up-to-date records on personnel, including subcontractors and assessors used. The records shall include:
  - a. Name, address and contact details;
  - b. Position held;
  - c. Educational qualifications and professional status;
  - d. Experience and training;
  - e. The assessment of competence;
  - f. Periodic performance review;
  - g. Authorisations to conduct assessments and/or make certification decisions;
  - h. Date of most recent updating of each record.
- 34.5. The CAB shall ensure that records are kept, managed and disposed of in such a way that the integrity of the process and the confidentiality of the information are maintained.
- 34.6. The CAB shall retain individual records for at least five years.
- 34.7. The CAB shall make all records and documentation relating to the delivery and implementation of SFA standards available to the SFA upon request.





# **SUSTAINABLE FIBRE ALLIANCE**

*Creating a Sustainable Cashmere Value Chain*

Contact: [standards@sustainablefibre.org](mailto:standards@sustainablefibre.org)

Sustainable Fibre Alliance (SFA) is a registered charity in England and Wales;

Registered Charity Number 1165742; Company Registration No. 9389265