

Red Tractor Farm Assurance Crops and Sugar Beet Scheme – Annual Report to the EU Commission Directorate-General for Energy to cover the period January 2022 to December 2022 inclusive

#### **Certification Bodies**

The Red Tractor Crops and Sugar Beet Scheme is operated to ISO/IEC 17065 to demonstrate independent auditing. All certification bodies are accredited, recognised and regularly monitored by the national body; United Kingdom Accreditation Service (UKAS).

Farm/ member audits for the Red Tractor Crops and Sugar Beet Scheme were carried out by three certification bodies (CBs):

- 1. NSF
- 2. SAI Global Assurance Services Ltd
- 3. LRQA (formerly Lloyd's Register, Acoura and SFQC Ltd)\*

### Annex 1 Information for Red Tractor Crops and Sugar Beet Scheme

### a. Independence, modality & frequency of audits

Independence, modality and frequency of audits remains as per the most recent submission. The Red Tractor Crops and Sugar Beet Sector has a set of documented Standards used as product certification standards. All members of the scheme are assessed each membership year against every one of the scheme standards to establish full compliance and maintain certification.

Under normal circumstances, the assessment is an on-farm audit of farm premises and records. These on farm assessments are carried out by independent certification bodies (see above). All new members are required to undergo this independent audit before being able to market crops as assured. The assessment and certification are delivered by third party Certification Bodies (CBs) who, by contract ('the certification contract'), are licensed by Red Tractor to use the standards and provide certification for scheme members to ISO/IEC 17065.

There is also an annual programme of 'spot checks' and poorer performing members may be subject to an increased frequency of assessment.

During 2020 and 2021 many audits were undertaken remotely in response to the restrictions imposed by the Covid 19 pandemic. With the lifting of these restriction audits gradually moved back to taking place in-person. All audits for those members who are certified as compliant with the recast RED have taken place in-person since 1<sup>st</sup> July 2021.

b. Availability of, and experience and transparency in the application of methods for identifying and dealing with non-compliance including allegations of serious wrongdoing on the part of members of the Scheme.

<sup>\*</sup>NB LRQA ceased being a certification body for Red Tractor 31st December 2022



All members of the Scheme are provided with 'How the Red Tractor Assurance Scheme Works' (incorporating Membership Rules) document.

This document is also published on the Red Tractor Assurance website <a href="http://assurance.redtractor.org.uk/standards/member-rules.">http://assurance.redtractor.org.uk/standards/member-rules.</a>. The Rules detail procedures for identifying and dealing with non-compliance and allegations of wrongdoing on the part of members.

The scheme standards are in addition to all existing statutory requirements and members are required to comply with all legislation relevant to the scope of the scheme at all times.

Any false or misleading statement made on the application form, during assessments or in any other communication may lead to suspension or withdrawal of certification. Members are also required to notify their certification body of any prosecution brought or likely to be brought against them with respect to any issues covered within the standards.

Where there are points identified within the annual audit on which the standards are not met, the procedures outlined in the original submission are followed.

No complaints were received in relation to the Renewable Energy Directive in 2022.

 Transparency, in relation to the accessibility of the scheme, availability of translations, accessibility of details of certified operators, relevant certificates and accessibility of auditorreports

Access to the latest Scheme Standards Version 5.1 dated October 2022 is available via the <u>Red Tractor Assurance website</u>.

All members of the Scheme have been provided with a printed version of the Scheme standards and further copies are available from Red Tractor or Certification Bodies. Updates are available via the Red Tractor website; an insert outlining the 5.1 standard can be found <a href="here">here</a>.

Accessibility of details of certified operators and relevant certificates is via the <u>Red Tractor checker</u> which is available on the website.

The database tracker and member checker are the definitive means of confirming assurance status and membership details at any given point. The online member checker database system and tracker also identifies the compliance status for biofuel or bioliquid markets of Red Tractor Crops and Sugar Beet Scheme participants and this information is accessible to the supply chain. In 2021, Red Tractor also added a downloadable pdf RED certificate for each member which includes the crops grown by the member and map references for each store used by the member.

A copy of any non-conformance report is left with the Scheme member following the assessment. CBs provide Red Tractor with the data outlined in Annex II of the recast Renewable Energy



Directive (Directive 2018/2001), which is detailed on the pdf RED certificate. This also facilitates monitoring consistency and performance across CBs. The Certification contract also requires CBs to furnish Red Tractor with full details of any audit upon request.

The Red Tractor Crops and Sugar Beet Scheme is available for farmers and growers within the United Kingdom. Most members are within England and Wales and there have not been any requests for translations.

## d. Stakeholder involvement, as regards consultation of indigenous and local communities prior to decision making during drafting & reviewing of scheme etc.

The Red Tractor Crops and Sugar Beet Scheme is one of the schemes operated as an industry self-regulatory initiative by Assured Food Standards (AFS). AFS is owned by the UK food Industry and overseen by a series of technical and policy boards. It operates independently and on a not-for profit basis.

The Red Tractor Crops and Sugar Beet Board is comprised of representatives of all major stakeholders plus an independent pesticide adviser. <u>Details of Board members</u> are available on the Red Tractor website.

The Standards are under continuous review and scrutiny and a formal stakeholder review is undertaken every 3 years. The most recent consultation was launched in October 2020 and changes to the Standards were published in July 2021 for implementation in November 2021.

Updates are sometimes made within the three-year period – an update was implemented in the Crops and Sugar Beet Scheme in October 2022 to clarify the rules around the use of toxic rodent baits.

## e. Robustness of Scheme, in light of rules on the accreditation, qualification and independence of auditors and relevant scheme bodies

All certification bodies must be accredited, recognised and regularly monitored by the national body, United Kingdom Accreditation Service (UKAS).

In addition, the Scheme normative documents include a certification contract and a Protocol for Certification Bodies Offering Certification Against Red Tractor Assurance (RTA) Standards. All CBs are required to sign the contract and conform to the requirements of the Protocol which include:

- Operational management
- IT system and data integrity
- · Assessor recruitment and training, performance and consistency monitoring
- Assessment and Certification
- Process 6 monthly KPIs

Each Certification Body also publishes its rules and requirements on the relevant website.



Red Tractor has a documented Complaints Procedure that outlines actions and investigations to be undertaken in the event of serious complaints, enforcement challenges, prosecutions etc.

Before being allowed to assess to version 5 of the standards, Red Tractor retrained all the assessors using a new e-learning programme with courses including sector specific elements and tests to ensure understanding .All assessors are required to gain a pass of 90% in both a multichoice test and a free-text scenario-based test.

# f. Market updates of the scheme, amount of feedstocks and biofuels certified, by country of origin and type, the number of participants

The Scheme Rules permit Red Tractor to produce and publish statistical reports drawing upon aggregated scheme data.

### g. System that tracks proofs of conformity with sustainability criteria & follow-up of fraud or other irregularities

The annual audit of Standard EI.3. plus its associated Appendix tracks whether land that is being used to produce biofuels and bioliquids has had one of the following statuses on or after Jan 2008:

- A high biodiversity value or
- Land with a high carbon stock or
- Land that was peatland unless evidence is provided that the cultivation and harvesting does not involve drainage of previously undrained soil

The RT database is updated following each audit as is the assurance certificate for each scheme member which confirms the current compliance status for biofuel or bioliquid markets of Red Tractor Crops and Sugar Beet Scheme participants.

In addition, a post-harvest declaration form is sent with each load delivered from farm. This is commonly known as a 'grain passport' document and it includes a signed, dated declaration that the load has been grown on land that meets the recast Renewable Energy Directive sustainability criteria. To be recognised as originating from an assured holding the post-harvest declaration must be completed by inclusion of the relevant valid scheme membership information.

Any false or misleading statement made on the application form, during assessments or in any other communication may lead to suspension or withdrawal of certification. Members are also required to notify their CB of any prosecution brought or likely to be brought against them with respect to any issues covered within the standards. Upon receipt of any enforcement challenges, prosecutions etc. Red Tractor has procedures to follow up with its own investigation.

### h. Options for entities to be authorised to recognise and monitor Certification Bodies

See above, RT requires CBs to be fully accredited with relevant extension of scope under ISO/IEC 17065, recognised and regularly monitored by the national body, United Kingdom Accreditation Service (UKAS).



### i. Criteria for recognition or accreditation of certification bodies

See above and original submission, the Red Tractor Crops and Sugar Beet Scheme is operated by CBs to ISO/IEC 17065 to demonstrate independent auditing.

#### j. Rules on how the monitoring of certification bodies is to be conducted

As per the most recent submission, the rules are clearly specified under the ISO/IEC 17065 accreditation system and include audits by the United Kingdom Accreditation Service UKAS.

In addition, RT has developed an internal monitoring system laid down in the Protocol for Certification Bodies Offering Certification Against Red Tractor Assurance (RTA) Standards (see also response to e) above.

Within the Red Tractor structure there is a function responsible for the compliance of all parties involved in the certification of Red Tractor members. This encompasses Certification Bodies are delivering against all requirements as laid down in the Certification Body protocol, which in itself covers certification personnel training, witnessed assessment schedules, assessment and corrective action reviews.

Regular meetings are held with key Certification Body personnel at a delivery level, data and technical level. KPI data for schemes and individual Certification Bodies are recorded and trends mapped. Should any deficiencies be noted then action plans with milestones are implemented.

All audit report information that is required by the Implementing Regulation is detailed on audit reports which are reviewed both through our internal database system and through randomized retrieval of reports direct from Certification Bodies. As noted above Red Tractor also undertakes a programme of witnesses with assessors from across the Certification Bodies which allows us to ensure that detail captured during the assessment process is transferred into the reported assessment report.

The Red Tractor Standards Committee and main Board of Directors are provided with details about Certification Body performance and compliance with Red Tractor procedures.

### k. Possibilities to facilitate or improve promotion of best practice

The Red Tractor Crops and Sugar Beet Board, the Board of Directors and the Standards Committee consist of stakeholder representation, all of which continually review, assess and monitor best practice across the industry. There is ongoing liaison with research institutions, trade bodies, industry and faming organisations, European and global organisations resulting in significant co-operation and commitment from farmers, processors, retailers and manufacturers to ensure that the RT standards reflect best practice whilst being comprehensive and responsible.