



## **Verifier and Inspector Guidance Update**

Dear Verifiers and Inspectors,

This document is intended to supplement the “C.A.F.E. Practices Verifier and Inspector Operations Manual”, the “C.A.F.E. Practices Verifier and Inspector Indicator Guidance Reference”, and the “C.A.F.E. Practices Verification Organization Approval Procedure”. This guidance update is divided into three sections: Program Document Updates, Verification Procedures and Methodology, and Indicator Interpretation and Updates.

### **Update Number 14.0–10/2020**

#### **1.0 Program Document Updates:**

##### **1.1 Verifier and Inspector Operations Manual – Version 5.4**

The new version of the Verifier and Inspector Operations Manual will include all procedures that have been created and/or updated, including recent Verifier Guidance Updates (VGU #12, VGU #13 and VGU #14). The updated version of the Verifier and Inspector Operations Manual will be available in 2021.

##### **1.2 Verifier and Inspector Indicator Guidance Reference– Version 1.2**

The new version of the Indicator Guidance Reference document includes all updated indicator guidance as detailed in section 3.0 of this VGU. The updated version of the Indicator Guidance Reference document will be available in early 2021.

##### **1.3 Verification Organization Approval Procedure – Version 2.3**

The new version of the Verification Organization Approval Procedure will include relevant updates for verification organizations. The updated Approval Procedure will include updates on topics such as requirements for inspectors, verifiers and lead inspectors. The updated version of the Verification Organization Approval Procedure will be available in 2021.

#### **2.0 Verification Procedures and Methodology:**

##### **2.1 ZT-CAR Process Updates**

As the C.A.F.E. Practices program is in the process of transitioning the responsibilities of reviewing supplier work plans and corrective actions from Starbucks to the verification organizations, SCS has already started to contact affected organizations directly to carry out work-plan and corrective-action review. SCS is in the process of establishing clear procedures and guidelines to follow on how verification organizations review work plans and complete the ZT-CAR process, which will be shared once finalized. SCS has started to oversee the ZT-CAR check process by conducting quality reviews at various stages in the process.

Verification organizations are expected to keep records of all documentation related to the ZT-CAR check (client contract, client ZT-CAR check plan, copy of completed ZT-CAR check report, and closing meeting signature form).

## 2.2 Supply Chain Discrepancies: Volumes

Verifiers are required to send a supply chain discrepancy as per section 6.4.5 of the Verifier and Inspector Operations Manual (V5.3) for any entities where a substantial difference is noted between production volume listed in the application and actual volume observed in the field. If during a verification, an inspector or inspection team notices such a difference, the verifiers needs to be informed at latest shortly after the verification closing meeting, including any obtained information on where this difference comes from.

## 2.3 Early ZT Notification Submission

Verifiers are reminded that as part of the Early ZT notification process, verifiers are responsible for reviewing the evidence provided by the (lead) inspector and submitting the reviewed Early ZT notification to SCS for review within 5 business days after the verification closing meeting. Once reviewed and confirmed by SCS, the verifier must submit the notification to the supplier via the VRS. If the supplier confirms the reported Non-Compliances in the Early ZT notification, the notification is now automatically submitted to Starbucks and no further action is required on behalf of the verifier.

Should SCS request updates to the Early ZT notification and return it to the verification organization, a revised version will need to be resubmitted within 2 business days. Verifiers are requested to ensure that inspectors reporting ZTNCs are available even after submitting their first notification to be able to clarify questions resulting from the review conducted by SCS.

## 2.4 Requirements for Inspectors and Verifiers

In addition to the requirements for inspectors and verifiers detailed in the Verification Organization Approval Procedure (V2.2), an individual must meet the following requirements in order to be eligible as a C.A.F.E. Practices inspector, lead inspector or verifier: (1) demonstrated experience in the agriculture field and certification/verification schemes; and (2) demonstrated knowledge on coffee production.

## 2.5 Lead Inspectors

The concept of a lead inspector was introduced in VGU #12 and SCS is continuing to develop exact requirements for this position.

Lead inspector responsibilities include the general responsibilities of an inspector as detailed in the Verification Organization Approval Procedure, but they are also enabled to support in general verifier responsibilities, including conducting internal observations for new inspectors/verifiers and carrying out report review in the VRS.

Review of inspection report(s) must be completed by at least one C.A.F.E. Practices trained verifier or lead inspector who did not participate in that verification.

## 2.6 SCS Approval of New Personnel

New personnel must be approved by SCS before conducting any C.A.F.E. Practices verification work.

Individuals who did not maintain their approval for at least one year and re-enter the program, regardless of affiliation with the verification organization, need to be considered new and must comply with all the approval requirements outlined in the Verification Organization Approval Procedure (V2.2) and VGUs #12-14.

In order for approval to be considered for new personnel, verification organizations must submit up-to-date CVs, signed conflict of interest and confidentiality statements, and evidence of internal trainings on C.A.F.E. Practices and coffee production and processing, if applicable, for

any prospective inspector/verifier to SCS. SCS will conduct a review of the materials and confirm whether the inspector/verifier is approved for internal field observation in the C.A.F.E. Practices program based on their credentials. SCS will also need to approve a new verifier or lead inspector, even if that person was approved as an inspector for the organization already.

After receiving the preliminary approval from SCS, the verifier can create an account in the VRS for the new personnel. In the case of lead inspectors, the account should be created in the VRS as a verifier account, with a “lead inspector” note entered in the “Additional names” field.

Before carrying out any inspection work, each new inspector/verifier should observe at least one full day of C.A.F.E. Practices inspection(s). In any case when the C.A.F.E. Practices inspection team includes inspectors who are new to the C.A.F.E. Practices program and are under observation, the verifier or a lead inspector must attend the opening meeting of the verification as well as perform at least two full days of internal observation of each new member of the inspection team in order to ensure the inspectors have been provided adequate training and guidance. If two full days cannot be done consecutively, then they should be observed during the number of inspections that are equivalent to two full days (see section 6.4.1 “Preparing the Verification and Inspection Plans” of the C.A.F.E. Practices Verifier and Inspector Operations Manual V5.3), before conducting any inspection work on their own. This applies regardless of whether a SCS shadow audit is occurring concurrently or not, and regardless of whether the new team members have previously worked with another verification organization. Ideally, the new inspector will be observed while inspecting multiple entity types. The new inspector must write the report in the VRS themselves and receive guidance on that process. To finalize the process of approval for new inspectors, the internal observation report will need to be sent to SCS, confirming that the inspector meets the requirements to conduct inspections independently and received approval to do so by the verifier or lead inspector. The internal observation requirement applies for both new inspectors and new verifiers. However, if an inspector becomes a verifier for the same organization, an internal observation report is not required.

## 2.7 Evaluation of Entities against C.A.F.E. Practices Criteria

Unless otherwise specified within the indicator itself or in the Indicator Guidance Document, the evaluation of new supply chains (applications being verified for the first time in C.A.F.E. Practices) in the program shall be done by verifying information as far back in time as the date of the issuing of the First Response Letter. For re-verifications (applications that have previously undergone C.A.F.E. Practices verification), the entities should be evaluated for complying with the indicator since the last verification (unless otherwise noted in the indicator itself or in the Indicator Guidance Document). Whether the supply chain is to be considered a new one or a re-verification, is displayed in the header of the application in the verifier interface in the VRS:

Manage Applications / Application 10074244FY19

**TEST 2019** Application ID **10074244FY19** — Independent

Client Reports					
Country/Region	Progress	Due	Sampling	Type	Legacy entities
Kenya	New		25%	Reverification	10087958FY14, 10036735FY13, 10031752FY20

The type of supply chain also facilitates the determination of the in-harvest verification requirement. Each new supply chain needs to be inspected in harvest, as communicated in VGU #13.

## 2.8 Appeals

The process for communicating appeals and disputes has been revised and will be amplified in section 7.1 of the Verifier and Inspector Operations Manual (V5.4).

Verifiers are no longer required to contact SCS first to clarify if an appeal is justifiable. Verifiers are required to submit a draft C.A.F.E. Practices verification report to the client prior to submission to Starbucks for review and approval. Clients have the option to approve the client report through the VRS. The client can decline to approve the version of the report sent, by initiating the appeal process.

A client may either **appeal** due to clear **errors** (e.g., indicator evidence contradicts indicator evaluation) in the report **or** may not be in agreement with the **interpretation** of indicators/criteria and/or verification procedures.

The verifier should inform SCS of the appeal if any reporting deadline is affected by it, according to the communication protocol in Section 11 of the Verifier and Inspector Operations Manual (V5.3). In all cases the verifier should set the appeal flag for the application through their interface and remove it once the appeal is resolved.

The verifier should review the supplier appeal and provide responses to clarify interpretation, or make any changes if errors were encountered by returning the affected reports to the inspectors to make the necessary changes. It may be necessary to revise draft client reports and send the updated version to the client for approval.

The required communication information for disputes has been updated. When sending a dispute email to SCS, the general email address [cafeprac@starbucks.com](mailto:cafeprac@starbucks.com) should be kept in copy, individual Starbucks emails are no longer required. Also, the supplier will need to be included in copy in the email initiating the dispute with SCS.

## 2.9 Use of Tablet or Paper-based Field Notes

During the verification planning phase, it needs to be ensured that there are sufficient field notes available for the inspection team to conduct the verification, considering possible supply chain discrepancies. The verifier needs to be aware if the inspector is using paper-based field notes or an electronic device to record evidence.

During inspections, inspectors should always use the entity-specific paper-based C.A.F.E. Practices Field Notes available at <http://www.scsglobalservices.com/starbucks-cafe-practices> or the electronic version accessed through the inspector account in the VRS. All field notes and respective electronic reports, if applicable, need to be reviewed by verifiers or lead inspectors as part of the internal report review process to ensure accuracy with information entered into the VRS.

Verifiers should maintain updated, secure files of all C.A.F.E. Practices field notes from verifications or PDF reports of inspections conducted on a tablet.

## 2.10 Water Bodies

In C.A.F.E. Practices, a water body refers to any natural or man-made water body, including ponds, lakes, streams, springs, rivers, wetlands, all kinds of wells, or other areas that ordinarily (permanent) or intermittently (temporary) contain water.

### 2.11 Standalone Mills

'Standalone' wet mills are processors that receive coffee cherry from at least two different farms and mill it to the parchment stage. Standalone dry mills are processors that receive parchment coffee from at least two different farms and that de-hull parchment coffee received and/or sort, grade, bag, or otherwise prepare the green coffee for export.

### 2.12 List of WHO 1A and 1B Pesticides

Verifiers and inspectors are reminded that the updated WHO 1A and 1B list of banned pesticides should be consulted to determine if a pesticide is permitted for the evaluation of CG-EM1.1. The updated list of banned pesticides will be included in the updated Verifier and Inspector Operations Manual (V5.4).

## 3.0 Indicator Interpretation and Updates:

For the indicators below, new or updated guidance has been developed that will be included in the next version of the Verifier and Inspector Indicator Guidance Reference. When new guidance is noted, it will be added to existing guidance to supplement current guidance, when it is noted as updated, it will replace or modify current guidance.

### 3.1 Receipts and Invoices

EA-IS1.3	Entity keeps receipts or invoices for the coffee (cherry, parchment, green) it buys or sells.
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**New guidance:** For new supply chains that have not yet sold any coffee as C.A.F.E. Practices verified, inspectors should evaluate any receipt exchanges between entities to ensure that there is a system for managing traceability.

### 3.2 Minimum Wage

SR-HP1.1	<b>ZERO TOLERANCE: All permanent workers</b> are paid the nationally or regionally established minimum wage. If minimum wages for permanent workers have not been established, all permanent workers are paid the local industry standard wage. If workers are paid by production, wages meet the nationally or regionally established minimum wage, or, where minimum wage has not been established, the local industry standard wage.
SR-HP1.2	<b>ZERO TOLERANCE: All temporary and seasonal workers</b> are paid the nationally or regionally established minimum wage. If minimum wages for temporary/seasonal workers have not been established, all temporary/seasonal workers are paid the local industry standard wage. If workers are paid by production, wages meet the nationally or regionally established minimum wage, or, where minimum wage has not been established, the local industry standard wage.

#### **Updated guidance (in bold):**

##### **Minimum Evidence Required:**

- National/regional minimum wage, including the legal reference, **or wage as established by the C.A.F.E. Practices program.**
- For workers that are paid by productivity (i.e., piece-rate), **evidence must include productivity range (e.g., kg per hr, highest and lowest), price per unit (e.g., \$ per kg), AND corresponding payment rate;** and

- Rates paid for different tasks performed at the entity, e.g. harvesting, weeding, security (watchmen);

**New guidance:** For medium/large farms, documentation of wages must include hours worked in order to confirm that the minimum wage is met.

### 3.3 Written earning records

SR-HP1.4	Management maintains complete written earning records for at least the past year, which itemize all: wages, overtime worked, and deductions. For warehouses and mills, hours AND days worked must also be included in the records.
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**New guidance:** This indicator is applicable when workers are hired, directly or indirectly through a labor intermediary/contractor, etc. This indicator cannot be evaluated as Not Applicable if workers are contracted. “Complete” means for all workers in all activities, 12 months back from the month of inspection.

SR-HP1.6	<u>EXTRA POINT:</u> Workers are given copies of earnings records, which itemize all wages, overtime and deductions.
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**New guidance:** This indicator can only be evaluated Comply in cases where earning records are given proactively. If workers need to ask for a copy of the records, the correct evaluation is Not Comply.

### 3.4 Wages above Minimum Wage

SR-HP1.10	<u>EXTRA POINT:</u> All permanent workers are paid MORE than the nationally or regionally established minimum wage. If minimum wages for permanent workers have not been established, all permanent workers are paid MORE than the local industry standard wage. If workers are paid by production, wages are higher than the nationally or regionally established minimum wage, or, where minimum wage has not been established, the local industry standard wage.
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**New guidance:** This indicator can only be evaluated as Comply if all permanent workers receive more than minimum wage throughout the time they work. If there are times, e.g., during low season, in which they are payed only minimum wage, the indicator cannot be evaluated as Comply.

In the case of in-kind payments, determining the value of the in-kind payments will be necessary to evaluate whether the sum of in-kind and monetary payment is above minimum wage.

### 3.5 Time spent on Required Trainings

SR-HP1.13	Time spent by workers in any required trainings and meetings is considered working time and workers are compensated at their normal rate.
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**New guidance:** A training deemed required is one that is pertinent to the job at hand.

### 3.6 Recruitment Fees from Labor Intermediaries

SR-HP1.16	Workers are not required to pay a recruitment fee as a condition for employment.
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**New guidance:** Inspectors should pay special attention to this practice in countries where it is common practice for labor intermediaries to obtain a fee from workers. Inspectors should also pay close attention for cases where the fee is charged to the entity itself rather than the workers, but the entity then deducts the fee paid to the intermediary from worker payments.

### 3.7 Labor Intermediaries

SR-HP1.17	<b>ZERO TOLERANCE:</b> Labor intermediaries are only used where legally permissible. Legal status of the intermediary can be demonstrated at the time of inspection. All necessary documentation from the labor intermediary is made available at the time of the inspection to support evaluation of relevant Social Responsibility indicators.
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**New guidance:** This indicator applies to workers employed through labor intermediaries that either handle the coffee (like cargo personnel) or work in/on the entity like security guards and cleaning personnel.

The following has been **removed** from SR-HP1.17 guidance:

*“c) provision of all necessary documentation to support evaluations of Social Responsibility indicators for workers of labor intermediaries.”*

Non-Compliances for lack of documentation must be evaluated in the respective SR indicators.

### 3.8 Worker Representative and Meetings with Management

SR-HP2.1	Workers have either direct communication or a designated representative to communicate with management or employer.
SR-HP2.5	There are regular meetings between management and employees or worker's representative to improve working conditions.

**New guidance:** The inspector must ensure the designated representative is a worker who is not part of the management.

Inspectors should evaluate and note in the evidence whether the meetings are regular enough to give workers sufficient opportunity to communicate their needs based on the context of the specific entity.

### 3.9 Worker's Associations

SR-HP2.6	<b>EXTRA POINT:</b> If a workers' association or committee exists, a workers' association fund has been established to which management and workers contribute matching funds.
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**New guidance:** In the case where there is no association/committee this indicator should be evaluated as Not Applicable. In the case where an association/committee exists but there is no fund this indicator should be evaluated as Non Comply. In the case where an association/committee and a fund exist but management does not contribute this indicator should be evaluated as Non Comply.

In the case where an association/committee and fund exist, but management contributes less than matching funds as workers (i.e., management contributes fewer funds than what the workers contribute), then this indicator should be evaluated as Non Comply. When an association/committee and fund exist, management contributes at least matching or more then this indicator should be evaluated as Comply.

### 3.10 Working hours

SR-HP3.1	All workers do not work more regular hours (before overtime) per day or week than allowed by local law. If regular hours are not established, regular hours are considered as 8 hours per day, 48 hours per week.
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**New guidance:** Different worker positions may have different hours established by law (e.g., some countries establish 60 hrs/week as regular working hours for security guards)

### 3.11 Hazardous Activities

SR-HP3.5	Hours worked on potentially hazardous activities (pesticide application, very heavy labor, etc.) are limited according to the law. If hours have not been established by law, the activities are limited to six hours per day.
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**New guidance:** If no hazardous activity is done at the entity, this indicator should be evaluated as Comply.

Examples for potentially hazardous activities include: pesticide-related activities (exposure risk based on Material and Safety Data Sheets), carrying heavy loads (carrying 60 kg for more than 15 minutes), exposure to loud noises (6 hrs), using machinery (6hrs), high pruning, etc.

### 3.12 Child Labor

SR-HP4.1	ZERO TOLERANCE: Employer does not directly or indirectly employ any persons who are under the age of 14 or the legal working age (ILO Conventions 10 and 138).
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SCS has expanded guidance for SR-HP4.1 to define hazardous and light work, to include reference to the worst forms of child labor, to define indirect and direct employment, and to include additional references to national legislation. Guidance on how to evaluate child labor will be provided in early 2021 as a distinct, standalone guidance document.

**Updated guidance:** Indirect employment refers to situations where children are not hired directly by the entity itself, but are working through a labor intermediary, lead harvester, or other group, or are assisting a family member when the family member is hired by the farm owner. Only when permitted by national legislation, there can be some allowance for minor assistance or “light work” on farms during the coffee harvest for children accompanying farm workers ages 12 to 14 or age 13 to 15 (depending on national legislation and the minimum working age. “Light work” can include occasionally picking coffee, carrying loads of less than 20% of the child’s body weight, and caring for siblings in the field (ages 13-14 only). Children working as part of “light work” should not be working alongside their parents for the same number of hours and conducting the same type of work. If children accompanying farm workers ages 12-14 or age 13 to 15 (depending on national legislation and the minimum working age) are observed assisting their family, the inspector must ensure that the activities: (i) are not harmful to the child’s health and development (i.e. hazardous work), (ii) do not interfere with schooling, (iii) involve supervision of an parent or guardian, (iv) must not exceed 14 hours a week, and (v) meet all legal requirements for young workers as defined by national law. The number of light work hours that can be done during school holidays must be verified in

national legislation but should not exceed 14 hours. If children under 14 or under the national legal working age are present on the farm accompanying farm workers and are in violation of conditions (i) to (v) above, SR-HP4.1 should be evaluated as Not Comply. “Hazardous work” includes the handling of pesticides or hazardous waste or work conducted in pesticide storage areas; the operation or cleaning of machinery/power tools or work conducted in tool storage areas; activities that require physical effort beyond the child's safe capacity, such as lifting heavy objects with loads greater than 20% of their body weight; working on steep slopes of more than 50%; and night work. A country’s list of Hazardous Child Labor activities should be reviewed to ensure that the activities carried out by children are not hazardous as defined by national legislation. In no cases should children accompanying farm workers under the age of 12 be doing any type of work.

Under no circumstances, children can be involved with jobs that are considered the worst forms of child labor, as defined by Article 3 of ILO Convention 182.

Payment made directly (e.g., by farm owner) or indirectly (e.g., through a parent or other entity who is not the farm owner) is not a condition for an NC evaluation for SR-HP4.1. Children who are unpaid and accompanying farm workers may also be performing child labor and the conditions of their work must be evaluated. Inspectors are required to assess whether entities that use a third-party organization or employment agency to contract workers are employing persons under the age of 14 or the legal working age. If workers under the age of 14 or the legal working age are found to be working either through an employment agency or directly for the farm and are not contributing light work as part of family labor, SR-HP4.1 should be evaluated as Not Comply.

Only when permitted by national legislation, the children of the farmer may work on their family farm in work that (i) is not harmful to the child’s health and development (i.e. hazardous work), (ii) does not interfere with schooling or training, (iii) involves supervision of an parent or guardian, (iv) must not exceed 14 hours a week, and (v) meets all legal requirements for young workers as defined by national law (including the minimum age from which children can perform light work on their own family farm).

### 3.13 Habitable Housing

SR-WC1.1	Permanent and temporary/seasonal workers living onsite have habitable housing.
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**New guidance:** As part of the assessment of habitable housing, inspectors should also evaluate access to appropriate number and quality of sanitary facilities (bathrooms, showers, sinks).

The producer’s house, if he/she is the owner of the farm, does not fall under the scope of this indicator.

### 3.14 Sanitary Facilities

SR-WC1.4	Workers have convenient access to sanitary facilities that do not contaminate the local environment.
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**New guidance:** Sanitary facilities must be clean and working properly. Sanitary facilities include bathrooms and hand-washing stations.

### 3.15 Children Living Onsite

SR-WC2.1	<b>ZERO TOLERANCE:</b> Children of legal school age who live onsite or accompany family members who are working onsite attend school.
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**New guidance:** In the case of farms, “onsite” refers to the entity affiliated with the producer (the farm itself AND any housing provided for workers).

### 3.16 Training on Additional Skills

SR-WC2.5	<b>EXTRA POINT:</b> Employer supports training or workshops for permanent/full-time workers on additional skills or trades (i.e., financial literacy, second language).
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**New guidance:** This indicator is always applicable when there are permanent/full-time workers and can only be evaluated as Not Applicable in cases where the entity doesn’t employ permanent/full-time workers.

### 3.17 Medical Coverage

SR-WC3.4	Employer contributes to the cost of general health services for <b>all permanent workers.</b>
SR-WC3.5	<b>EXTRA POINT:</b> Employer contributes to the cost of general health services for <b>all temporary/seasonal workers.</b>
SR-WC3.6	Employer pays for all medical costs associated with documented work-related injuries and illnesses if not covered by other programs or services.

**New guidance:** If medical coverage is provided by general health services (e.g., by the state) and if the employer decides voluntarily to not contribute to the program, the correct evaluation for these indicators is Not Comply. If medical coverage is entirely provided by general health services (e.g., by the state) or if the law does not allow the employer to contribute, the correct evaluation is Not Applicable.

In cases where an employer pays for a Workers Compensation plan that covers injury costs the correct evaluation is Comply.

### 3.18 Enclosed Work Areas

SR-WC4.5	For all enclosed work areas, there is a documented fire and emergency evacuation plan. <i>Applicable to farms, mills, and warehouses.</i>
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**New guidance:** An outdoor space with gates is not considered an enclosed area.

### 3.19 Injury Reports

SR-WC4.6	Management maintains written injury reports. The written injury reports include the type of injury, name of worker, time and date, and location of the accident.
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**New guidance:** Even if no accidents have occurred in recent years, the entity needs to provide a template to record possible injuries with all the topics listed in the indicator for a Comply evaluation. If an entity does not have any recorded injuries, it should be confirmed in worker interviews that no injuries have occurred.

### 3.20 Injury Record Review

SR-WC4.7	Management reviews accident and injury records at least annually and updates safety procedures and training materials to prevent accident and injury re-occurrence.
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**New guidance:** Inspectors must evaluate whether management implemented changes to procedures and training materials in an appropriate amount of time. In case where no accidents have occurred, the correct evaluation is Not Applicable.

### 3.21 Prohibited Entrance

SR-WC4.10	Entrance is prohibited to areas where pesticides were applied 48 hours prior without protective equipment.
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**New guidance:** Chemicals include both pesticides and herbicides as well as rodent management in warehouses, dry mills, storage areas and housing. If the product label re-entry interval (REI) indicates less than 48 hours required, entrance can be granted before the 48hrs without PPE, as long as the safe time frame indicated on the label has been respected. Signposts need to clearly indicate prohibition of entry.

### 3.22 Emergency Exits

SR-WC4.11	For all enclosed work areas, there is a sufficient number of emergency exits that are clearly marked, unobstructed at all times, unlocked when workers are present or have latches that do not require special operation.
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**New guidance:** In order to evaluate “clearly marked”, inspectors should confirm that the sign is not only clearly visible by the exit, but that workers may identify the exit from wherever they are located within the enclosed work area.

### 3.23 Safe Working Environment

SR-WC4.12	Employees are provided with a safe working environment.
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**New guidance:** Safe work environments have well ventilated and lighted enclosed areas, machinery and equipment of the site are kept in good condition and have adequate protection and safety devices. There are stairs, emergency exits and fire extinguishers with signage and they remain accessible.

Examples of unsafe work environments can include unprotected electric wires, uncovered trenches, water tanks and lagoons, unstable ladders and bridges, overstacked coffee, very narrow alleys, slippery floors.

### 3.24 Equipment Maintenance

SR-WC4.13	All equipment used by workers is properly maintained and safe to use.
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**New guidance:** Examples of equipment include (but are not limited to): wet/dry milling machinery, tractors, anything for transportation, spraying equipment, weeding machinery.

Inspectors should confirm with the entity representative that maintenance schedules are well known and clearly defined and documented. “Properly maintained” should show records of servicing, recalibration, certificates, etc.

### 3.25 C.A.F.E. Practices Work Plan

CG-EM 2.1	Farm managers have developed and implemented a written C.A.F.E. Practices work plan AND improvement activities are tracked and documented.”
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**New guidance:** For new applications a general plan is sufficient, as long as it includes the criteria which are part of C.A.F.E. Practices. For re-verifications proof of follow up and documenting improvement activities is needed.

### 3.26 Coffee Processing Indicators relating to Calculations per Kg

CP-WC 1.1	The total volume of water used for pulping, washing, and sorting for coffee processing operations is tracked and recorded, documenting the <b>annual total</b> water used and <b>volume per Kg of coffee cherry processed</b> . <i>Indicator should be evaluated “Not Applicable” for mills that process 3500 Kgs or less in green coffee.</i>
CP-EC 1.1	The quantity of energy used on-site for coffee processing operations is recorded documenting both the <b>annual total</b> energy used AND, quantity of energy used <b>per Kg</b> of green coffee processed.
CP-EC 1.3	The quantity of <b>wood or other fuel</b> (except parchment skin) used for drying coffee is recorded, documenting both the <b>annual AND per Kg of green coffee processed</b> totals.
CP-RM 1.1	The quantity of energy (e.g., electricity and diesel) used on-site for coffee processing operations is recorded, documenting both the <b>annual total</b> energy used, AND quantity of energy used <b>per Kg</b> of green coffee processed.

**New guidance:** For new applications carrying out their first verification in C.A.F.E. Practices, these calculations can be made by the entity during the inspection. For applications undergoing a re-verification, these calculations need to have been made prior to the inspection and the methodology for the calculation needs to be explained to the inspector.