

Workflow: Procurement

Toolkit 11.2

Audit and Certification Compliance

target audience

Owners, managers, and supervisors.

what it is

The citrus market, and in particular the citrus export market, demands a high level of compliance to regulatory, quality, and phytosanitary rules. In short, these can be defined as risk management, quality, and quality assurance requirements.

Compliance to these requirements is assured by several inspections, certifications, and check points.

This toolkit lists some of the control and certification measures and focuses on your ability to prepare and comply with them.

why it is important

In the citrus export market, compliance to quality, regulatory and phytosanitary requirements is non-negotiable; if you do not comply, you cannot sell to that market.

Furthermore, the rules keep on changing as export markets demand additional measures:

- Logical, justifiable changes – Changes in agrochemical use (MRL thresholds), or in phytosanitary risk management processes.
- Market protectionism – Changes that are imposed that do not so much reflect a real risk (e.g., black spot, cold chain requirements) but are imposed by a citrus producing country to protect its own market.

Whatever the reason, whether scientifically reasonable or not, you have no choice but to comply if you want to compete.

Complying to the various requirements, audits and certifications can be a time-consuming process. Sometimes businesses work purely reactively rather than proactively, i.e., they have to prepare vigorously before an audit or inspection because they have not integrated the measures as standard operating practice and they do not maintain necessary data and documentation. Ideally, you want to build the various requirements into your standard operating practice so that you comply by default and not because you have had to fix many things in frantic preparation for the audit/check.

The various inspections, certifications, and regulatory bodies you have to satisfy include, but are not limited to:

- SA GAP
- GlobalGAP
- SIZA
- British Retail Certification (BRC Food Standards)
- PHCs
- NOSA
- Water rights and water licenses
- Borehole rights and yield certificates
- DALRRD
- PPECB.

success factors

- **Comprehensive understanding of compliance requirements** – This would include:
 - All the compliance criteria of all mandatory checks.
 - The latest technical specifications as published and communicated by the CRI.
 - Understanding of compliance areas with clearly set thresholds and those where no threshold is set (but requires risk management nonetheless).
- **Matching operating best practice** – You will benefit tremendously if you integrate all the compliance requirements into your standard operating best practice. This could include areas such as:
 - Procuring accredited materials.
 - Pre-sorting.
 - Sourcing and applying chemical treatments.
 - Excellent recordkeeping and documentation.
- **Avoiding duplication of work** – The above will prevent duplication of work. There will be numerous documents, data and records required by several institutions and bodies. Make use of technology and apply the rule of “prepare once, keep updated, and use often”.
- **Planning, scheduling, and accountability** – Ensure that you have a plan (what, when, how, who):
 - Schedule all the activities related to the various requirements and deadlines over a year.
 - List all the actions and items where you may be dependent on, i.e., input of an external stakeholder or service provider and secure commitments to provide this well in time.
 - Allocate responsibility for each activity.
- **Compliance of external stakeholders** – As a citrus packhouse you are reliant on several external stakeholders to maintain a clean compliance record:

- Your producers – They have a direct impact on the health of the region.
- Contractors and suppliers – Certification and compliance are important, e.g., packaging, bins, chemicals, etc.
- Seasonal staff – Seasonal workers can be a risk if they are not well trained.
- Logistics, cold chain, and harbour – Satisfy yourself that risks related to the more removed supply and value chain operate compliantly. Generally, you would do this as a member of a citrus producing region.

execution steps

See success factors.

assessment questions

Please Note: There is no minimum / maximum number of questions you can add.

1.	Do have a comprehensive list of all areas of accreditation and certification you are required to comply with?
2.	Have you integrated the data management and preparation of information for accreditation and certification purposes into your daily administrative process?
3.	Are you clear on the accreditation and certification requirement of all your suppliers (e.g., cartons) and service providers (e.g., logistics, cold chain services, container services etc)?
4.	Do you comply with all the requirements for all the necessary accreditations and certifications for an export business?
5.	Is accountability and process for all accreditation and certification activities and outputs clearly identified?

resources

1.	Citrus Export Standards (Citrus Academy)
2.	Production Learning Material – Food Safety (Citrus Academy)
3.	SIZA Updates and Reports
4.	BRC Global Standard Food Safety
5.	Export Citrus Postharvest Treatment Declarations and Labelling Considerations for 2020 (CRI - Cutting Edge 290/2020)
6.	Export Citrus Postharvest Treatment Labelling Considerations (CRI - Cutting Edge 202/2015)
7.	CRI Recommended Usage Restrictions (MRLs) 04/2022