



# VIVE CHAIN OF CUSTODY MODULE

The Continuous Improvement Sustainable Supply Programme for Sugar Businesses  
Issue 2.1 - November 2017

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**NOTE: Although this document may be translated into various languages for the convenience of users, the English version remains the definitive reference document in the event of any dispute.**

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## Introduction

VIVE is a voluntary continuous improvement sustainability programme for sugar supply chains that enables sustainability performance to be measured and improvement objectives to be set and tracked.

Driving continuous improvement in sustainability performance is fundamental to the VIVE programme. To create initial impetus, VIVE's data capture includes an assessment of current performance and also projections for performance over the next two years. This facilitates the production of action plans required to deliver projected improvements and, in subsequent years, enables analysis of actual delivery versus aspirations.

The VIVE programme is designed to be able to operate along the whole supply chain from producer to industrial end-user and comprehensively covers the key sustainability aspects within the areas of People, Planet and Profit. VIVE is able to act as an 'umbrella' programme, benchmarked against other sustainability initiatives. This provides the potential for one VIVE assessment to meet the requirements of several programmes at once, thus reducing 'audit fatigue'.

VIVE recognises that participants will be at different stages in their sustainability improvement journey when they join the programme and similarly they, or their customers, will have different immediate sustainability priorities. The VIVE programme is therefore made of three 'steps', representing a gradual path to sustainability, tailored to the needs, pace and ambition of each participant:

- **Step 1:** simplified entry level to cover key sustainability principles
- **Step 2:** claim level benchmarked against the entry requirements of other programmes
- **Step 3:** level highlighting areas of excellence, above the requirements of other programmes

Participants in the programme self-assess their sustainability status by completing an online self-assessment within the VIVE Online System. Whilst participants retain the obligation to ensure all information provided is accurate and complete (see below), participants' responses and supporting evidence will be reviewed by VIVE, including through on-site assessments, to see whether the evidence submitted and seen reasonably supports the responses given.

The underlying operating principle of the programme's assessments is first to assess whether a governance structure is in place to address a given issue, and secondly to assess whether that governance structure is being effectively implemented. For example, a positive response (within a participant's self-assessment) to a given question (e.g. the prevention of the use of forced labour) would be assessed firstly by confirming that an appropriate policy is in place, and secondly by confirming that the participant is able to produce records and practices that demonstrate that that policy is being effectively enforced.

The programme operates on a three year improvement cycle, during which all indicators are verified twice. Year 1 involves a full assessment (all indicators) as per the programme scope agreed with the participant, while partial assessments are conducted in the next two years (half of the indicators in Year 2, the remaining half on Year 3). In the fourth year, there is another full assessment and the improvement cycle repeats.

VIVE produces reports after each on-site assessment, and can produce benchmark reports for end-users analysing the sustainability status of all their participating suppliers.

For a summary of the rules governing the operation of the VIVE programme, participants are referred to the **VIVE Programme Manual**. Participants are reminded that, in taking part in the VIVE programme, they warrant that the answers and supporting evidence that they provide to VIVE are an accurate reflection of the current situation. Although an independent on-site assessment is an integral part of the VIVE programme, it remains the responsibility of the participating companies to ensure, and VIVE will operate on the premise, that all responses and evidence entered into the online system and otherwise provided to VIVE are true, accurate, not misleading and have no material omissions.

# The VIVE Modules

The full VIVE programme consists of five modules that, in combination, cover all the operations and activities that may have a bearing on the sustainability of the sugar products supplied. These modules are:

- **VIVE Governance Module**
- **VIVE Farm Module**
- **VIVE Facility Module**
- **VIVE Forwarder Module**
- **VIVE Shipper Module**

In addition, where at the present time the forwarder and shipper elements of a supply chain are not covered by the relevant supply chain companies' participation in VIVE, the **VIVE Chain of Custody Module** has been created as an interim solution to, as minimum, assess the traceability of VIVE sugar once it leaves the control of the producer.

It is VIVE's ultimate goal to be able to include entire supply chains within the programme, as the programme is based on the belief that the sustainability of sugar products cannot be adequately assessed and controlled unless the whole supply is considered.

## This VIVE Module

This Module is designed to assist participants in the VIVE programme by including the guidance from the VIVE Online System in a portable reference document. It includes the following:

1. A description of the criteria encompassed by the VIVE programme
2. The scores available to participants under each section of the VIVE programme
3. Additional Guidance on how to respond to questions in the VIVE Online System
4. Guidance Questions, which indicate the types of questions an assessor may consider when evaluating a participant company during an on-site assessment
5. The VIVE Indicators

To aid users of this Module, any amendments between published versions are highlighted in the Change history table, included in this Module.

## Legal Compliance of Participating Companies

Although the VIVE programme represents 'good practice', compliance with the VIVE Guiding Principles does not in itself absolve a participating company from, or diminish, obligations that may be incumbent upon the participating company as a result of any client, statutory, or regulatory requirements. In addition to the requirements of the VIVE programme, participants must ensure that all sugar products they supply meet the current legislative requirements of both the country in which the participating company is operating and the countries to which they supply sugar products.

Where a participant is subject to legal action by a Competent Authority or other Enforcement Agency in relation to matters that directly affect compliance with the requirements of VIVE and the integrity of the programme, the participating company must advise VIVE of this at the earliest possible opportunity.

## VIVE Ownership

VIVE is jointly owned and operated by Czarnikow Group Ltd and AB Sustain (a division of AB Agri Ltd).

## VIVE Contact

If you wish to contact VIVE please send an e-mail to: [VIVEinfo@absustain.com](mailto:VIVEinfo@absustain.com)

# Glossary of Terms

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**Additional Guidance** – Additional information to assist participants when completing the on-line self-assessment or evaluating how to address the requirements of the VIVE Programme.

**Chain of Custody** – Those steps of the supply chain for which a company participating in VIVE is directly responsible.

**Company** – Any reference to ‘the Company’ should be taken to include the participating company’s designated contractors wherever activities encompassed by the VIVE programme have been delegated to a third party. Under VIVE rules, a participating company may delegate an activity encompassed by the VIVE programme wherever this offers an effective solution but a participating company remains responsible for any Guiding Principles encompassed by the VIVE programme.

**Criteria** – The component areas that a participant should consider under each Guiding Principle of the VIVE Programme and against which they will be scored under the Indicator(s) relating to each Guiding Principle.

**Guidance Question** – The type of open question(s) a participant should expect to be asked in relation to each topic within the VIVE programme when a VIVE assessment team is undertaking an on-site assessment.

**Guiding Principle** – A succinct summary of the aspiration of VIVE when addressing any issue encompassed within the Programme. Guiding Principles are indicated by the Pillar letter, the Section numeral and the individual Guiding Principle reference number (e.g. ‘B3.1 Housekeeping’).

**Indicator(s)** – The question(s) that a participant should answer against each Guiding Principle of the VIVE programme in order to establish their position on the journey of continuous improvement and against which they will achieve a defined score. Indicators are designated by a Roman numeral (e.g. i, ii, iii, iv, v, vi, vii, viii, ix, x, etc.).

**Module** – The collection of VIVE Pillars applicable to a participant in the VIVE programme and related to the activity they undertake in the sugar supply chain. The Modules of VIVE include: Governance, Farm, Facility, Forwarder, Shipper and Chain of Custody.

**Objective** – A succinct summary of the overall goal of a Pillar or Section within the VIVE Programme.

**Pillar** – A collection of Guiding Principles relating to a specific area of the VIVE programme. Pillars are designated by a letter (e.g. A, B, C, etc.) The Pillars of VIVE include: Governance, Company Facilities, Crop, People, Environment, Traceability, Transport Handling & Storage, etc.

**Section** – A collection of Guiding Principles, covering closely-related areas of the VIVE programme within a defined Pillar. Sections are designated with a numeral alongside the reference letter of the Pillar in which they sit (e.g. ‘B3. Hygiene in the Workplace’, where ‘B’ is for the Company Facilities Pillar and ‘3’ is for the Section within the Pillar).

**Supply Chain Step** – Any facility, store, means of transport or process within a supply chain where VIVE product is subjected to an activity that may affect its physical form, expose it to contamination by another product or substance, result in loss of material during handling or result in it being comingled with another product. Typically each activity involving processing, storage and transport should be treated as a separate supply chain step. Due to the nature of sugar processing, the production process for raw or refined sugar will typically be considered as one Supply Chain Step.

# Change History

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Version number	Date of Publication	Author	Changes
2.0	01 October 2017	X Huchet	New version of the Facility Guidance document; new branding and programme name change.
2.1	07 November 2017	X Huchet	Revised version of A1.4 Mass Balance Time Boundaries

# TRACEABILITY

# A. Traceability Pillar

## OBJECTIVE

The Company should ensure that it can trace all VIVE products along the full length of its Chain of Custody.

## AI. Mass Balance

### OBJECTIVE

When segregation of VIVE products is not feasible, the Company must adopt the VIVE Mass Balance approach whenever bulk VIVE product is comingled with non-VIVE products.

The VIVE Mass Balance requires that VIVE products are kept administratively separate from non-VIVE products, while the physical products may be combined within the defined rules laid out in this Pillar.

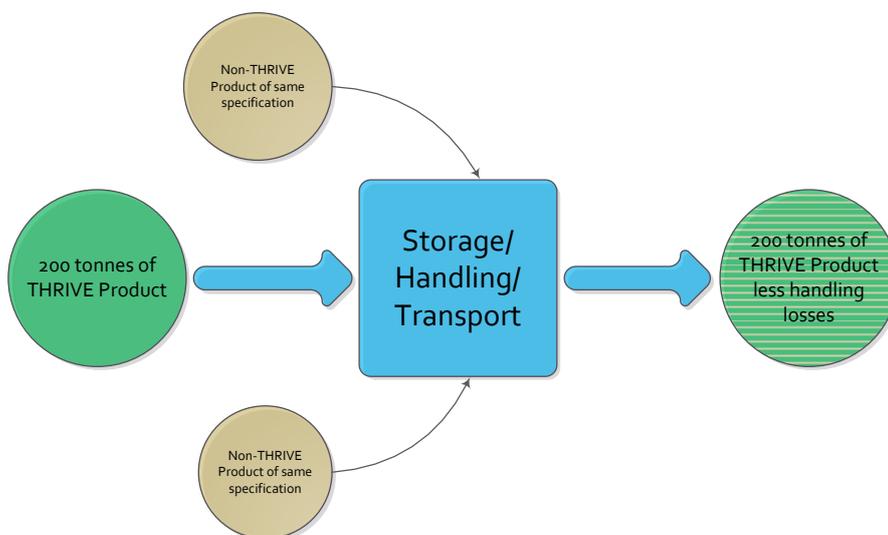
### AI.1 Chain of Custody Mass Balance Methodology

#### GUIDING PRINCIPLE

The Company must accurately measure all quantities of VIVE product entering a Supply Chain Step and all quantities of VIVE product leaving a step. Wherever handling losses occur within a defined step along the supply chain, these must be taken into account.

#### CRITERIA

The Mass Balance methodology used within VIVE allows VIVE product to be physically comingled with non-VIVE products meeting the same specification within a given Supply Chain Step but requires continued administrative separation of the VIVE tonnage to ensure there is no over-claiming of the tonnage assigned to VIVE. This is illustrated below:



## AI.2 Assignment of Mass Balance Data

### GUIDING PRINCIPLE

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The Company must comply with the VIVE Mass Balance rules in relation to assignment of data.

### CRITERIA

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The VIVE Mass Balance rules on assignment of data require that:

- Products leaving a Supply Chain Step may only be assigned data from products that physically entered the same Supply Chain Step. For example, if 100 tonnes of VIVE sugar are despatched from a store the necessary amount of VIVE sugar to deliver 100 tonnes of VIVE sugar, once handling losses have been taken into account, must have entered the same store
- It is acceptable to retain administrative balances of VIVE products after the physical goods have been despatched, while awaiting a sale (i.e., a long administrative position may be held)
- It is **not** acceptable to despatch products from a facility under the VIVE brand until adequate physical stocks of VIVE product have been received at the same facility to cover this quantity (i.e., a short administrative position is **not** acceptable)
- Any actual handling losses experienced by the physical goods must be reflected in all administrative balances (e.g. if a ship loads a given tonnage of VIVE sugar product, only the quantity of VIVE sugar that reaches the despatch point may be sold, taking into account any losses incurred during transfers and handling)
- Physical and administrative Mass Balance stocks of VIVE compliant products must be balanced, reconciled and audited within six months of the shelf-life of the sugar products assigned to VIVE

## AI.3 Mass Balance Physical Boundaries

### GUIDING PRINCIPLE

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The Company must limit each VIVE Mass Balance to an individual Supply Chain Step.

### CRITERIA

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The Company must define each step in the supply chain for which it is responsible.

Each Mass Balance must operate within a defined Supply Chain Step.

The administrative Mass Balance cannot move from one step to the next without a corresponding physical flow of product with the same specification that meets or exceeds the tonnage of the Mass Balance stock being allocated to it. It is not acceptable for one step to utilise the data for product delivered to another step without such a physical flow of product. For example, for 100 tonnes of the Mass Balance stock of sugar products of a given specification held in a port store to be allocated to a ship, at least 100 tonnes of physical material of the same specification must be loaded into the ship. The Mass Balance stock in the store will then be reduced by 100 tonnes and the Mass Balance stock in the ship be credited with 100 tonnes minus a pro rata share of any handling losses that may be experienced in the process of loading the ship.

Where more than one VIVE Mass Balance commodity is in the system of a given Supply Chain Step it is not acceptable to transfer the VIVE data from one type of commodity to another. For example, VIVE data for molasses cannot be transferred to sugar, even if both are held in stock at the same store, factory, etc.

## AI.4 Mass Balance Time Boundaries

### GUIDING PRINCIPLE

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The Company must limit the administrative life of any VIVE Mass Balance product to the shelf-life of the sugar products assigned to VIVE.

### CRITERIA

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The Company may only maintain an administrative Mass Balance for VIVE products while those products remain within their shelf-life. Once the shelf-life of a product assigned to VIVE has expired, the associated VIVE Mass Balance cannot be reassigned to any other product and any administrative Mass Balances left after this period must be deleted.

## A2. Traceability of Mass Balance Products

### OBJECTIVE

The Company must be able to trace all of the VIVE products it receives back to the third parties from which they were received and forward to the third parties who receive them.

It is acceptable to comingle bulk sugar products only if the individual weights of the VIVE constituent parts are documented and retained for Mass Balance purposes.

### A2.1 Traceability of Incoming Products

#### GUIDING PRINCIPLE

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The Company must be able to demonstrate traceability for the VIVE products it receives.

#### CRITERIA

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The Company must be able to demonstrate traceability for all VIVE products received at any step in its supply chain. This will require the ability to produce a traceability trail for each delivery of VIVE product back to the point in the supply chain where a previous Mass Balance occurred and/or the VIVE status of the product can be verified.

Upon request, the Company must be able to provide a traceability trail back to the previous third party in the supply chain for each lot of VIVE product. To facilitate this, the Company must:

- Record the names and addresses of suppliers of incoming VIVE products
- Record the types and quantities of incoming VIVE products
- Record the numbers of the batches or lots of VIVE products received
- Identify the transport means and unique identification reference of the transport for all incoming VIVE products
- Where applicable, container, trailer and ship hold references must be known
- Where intermediate storage is used, the relevant stores, silos or bays must be known

## A2.2 Traceability of Outgoing Products

### GUIDING PRINCIPLE

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The Company must be able to demonstrate traceability for the VIVE products it despatches.

### CRITERIA

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The Company must be able to demonstrate traceability for all the sugar products it despatches, and that all VIVE products have either been segregated, or the VIVE Mass Balance rules have been adhered to, at each step of the supply chain for which the Company is responsible.

Upon request, the Company must be able to provide a traceability trail to its customers for each lot of VIVE product sent to them. To facilitate this, the Company must:

- Record the names and addresses of all customers
- Record the types and quantities of outgoing products
- Record the numbers of the batches or lots despatched
- Identify the transport means and unique identification references of the transport for all outgoing products
- Where applicable, container, trailer and ship hold references must be known
- Where intermediate storage is used, the relevant stores, silos or bays must be known

Traceability must continue from the point at which the Company receives any VIVE products to the point at which responsibility for any VIVE products is passed by the Company to the next responsible party in the supply chain. This must include:

- Any storage location (by bay, silo or tank)
- Ships (by hold or tank)
- Vehicles (by trailer reference)
- Port(s)
- Bulk handling equipment

## A2.3 Handling Losses

### GUIDING PRINCIPLE

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The Company must accurately measure handling losses of VIVE sugar products passing through the various steps in its Chain of Custody.

### CRITERIA

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The Company must ensure that all records for calculating the loss factors for VIVE sugar products are supported by verifiable data.

The Company must ensure that any losses incurred during handling are calculated and taken into account when establishing administrative stocks under the VIVE Mass Balance rules at each step in the Chain of Custody.

Where a factor is used to establish handling losses, the Company must ensure these figures are validated at least once every crop year.

# GOVERNANCE

# B. Governance Pillar

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## OBJECTIVE

The Company should embed in its business practices the processes necessary for the successful implementation of VIVE and the maintenance of the Programme's integrity and credibility.

The Pillars of VIVE will only deliver continuous improvements towards sustainable sugar production effectively if they are built on the sound foundations of robust Governance. The Guiding Principles included within Governance apply to all of the Guiding Principles within this module.

## BI. VIVE Online Self-Assessment

### GUIDING PRINCIPLE

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The Company should ensure its data is kept up-to-date in the Online System.

### CRITERIA

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The Company should collect information on its own activities and, where relevant, those activities of third parties upon which it is reliant to ensure any applicable Guiding Principles of VIVE are met. This information should be used to update relevant sections of the VIVE online system. As a minimum, the Company should update the Online System at the following times:

- At the end of the crop season
- One month prior to a VIVE Assessment
- When additionally requested by specific VIVE end-users (e.g. prior to approving a supplier for supply of products)

The Company should collate the information and evidence for each applicable Guiding Principle within VIVE and incorporate the findings as part of their VIVE Online Self-Assessment.

## B2. Company Policies

### GUIDING PRINCIPLE

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The Company should have Policies that are aligned to the relevant Guiding Principles of VIVE.

### CRITERIA

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The Company should assess whether its existing policies sufficiently encompass the Guiding Principles of VIVE or whether additional policy statements are required.

Where the Company is part of a group, any Group policy should be suitable for local use and adapted as necessary.

The Company Policies that commit to the effective implementation of the VIVE Guiding Principles should:

- Be Company and country specific
- Commit to compliance with all relevant national and local regulations
- Commit to providing sufficient resources to ensure the effective implementation of the VIVE Guiding Principles
- Commit to ensuring all affected staff are aware of those VIVE Guiding Principles relevant to their roles
- Be signed by a member of the Company senior management
- Be subject to regular review (at least annually)

## B3. Documented Procedures

### GUIDING PRINCIPLE

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The Company should ensure its documented procedures encompass the relevant Guiding Principles of VIVE.

### CRITERIA

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The Company should assess whether its existing documented procedures sufficiently encompass the Guiding Principles of VIVE or whether additional documented procedures are required.

Where VIVE requires procedures, they should be documented.

Documented Procedures may be held electronically or on paper and form part of a structured and certificated quality management system (e.g. ISO 9001) or be part of a national, industry or Company scheme that delivers equivalent controls.

Independently certified quality systems are not a pre-requisite under VIVE but where documented procedures are in place they should:

- Be approved, dated and signed by an authorised person
- Be readily available and understood by those required to operate to the requirements of the procedure
- Be reviewed at least annually and revised to reflect any significant changes that have an effect on the operations of the Company
- Be subjected to Internal Verification on at least an annual basis to confirm Company practices align with documented procedures. Findings should be reported to quality management and any necessary corrective actions should be recorded and implemented

## B4. Records

### GUIDING PRINCIPLE

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The Company should ensure that all relevant records meet VIVE's criteria (as listed below).

### CRITERIA

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Records may be kept in either hard or soft (electronic) format but should meet the following criteria:

- All records required by VIVE are kept for a minimum of two years or longer if required by legislation
- Where applicable, all data protection regulations should be adhered to
- Storage prevents any deterioration or damage to records under all likely local conditions
- Records are sorted and filed in such a way that information is complete and easily retrievable
- Records are legible
- Electronic record systems should be equipped with a secure logging system to confirm who created, amended or modified each record, what was changed and when
- Records are subject to audit, with findings reported to quality management and any necessary corrective actions recorded and implemented

## B5. Management Structures

### GUIDING PRINCIPLE

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The Company should be able to demonstrate management structures that will ensure VIVE is implemented effectively.

### CRITERIA

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The Company should be able to demonstrate a management structure and sufficient, suitably trained personnel to ensure that the Guiding Principles of VIVE are implemented.

There is no requirement to use the VIVE brand but where other systems or existing structures are utilised it is a requirement that the Guiding Principles of VIVE are encompassed.

Depending on the Company structure, individuals may hold more than one role and have other duties besides their involvement in the Implementation of the VIVE Guiding Principles. In all cases, however, adequate resources should be made available to ensure the implementation is effective.

Where the Company outsources activities to independent third parties (e.g. storage, transport, etc.) it should ensure that such independent third parties comply with all Guiding Principles within the VIVE Chain of Custody module relevant to those activities.

Any organisational structure used to implement the Guiding Principles of VIVE should be documented

### ADDITIONAL GUIDANCE

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A typical structure may include the following roles and responsibilities:

**A 'Steering Committee'** that includes representation from the senior management team of the Company. The Committee should meet before, during and after the crop season and circulate meeting minutes. The Steering Committee responsibilities should include:

- Providing guidance on the VIVE Guiding Principles
- Allocating human and financial resources to ensure effective implementation of the VIVE Guiding Principles
- Verifying the priorities for implementation
- Engaging with external stakeholders

**A 'Coordinator'** with direct responsibility to the Steering Committee for:

- Coordinating the 'VIVE' Team
- Driving the implementation of the VIVE Guiding Principles and continuous improvement

**A 'Team'** made up of cross-functional representatives (such as: Production, Procurement, Corporate Affairs, Legal Compliance, Health & Safety), to support the implementation of the VIVE Guiding Principles and continuous improvement. This Team should communicate regularly in order to plan, coordinate and manage all activities relating to VIVE, including:

- Review and approval of the VIVE online self-assessments
- Ensuring that any issues are correctly recorded and addressed
- Monitoring the implementation of recommended actions
- Escalating to the Steering Committee any issues that they cannot resolve

## B6. Training on the VIVE Guiding Principles

### GUIDING PRINCIPLE

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The Company should identify and train key personnel upon which it will rely for the effective implementation of VIVE.

### CRITERIA

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The Company should undertake regular training of key personnel throughout the year.

The Company should have:

- Identified key personnel to be trained in VIVE. The number, type and status of identified personnel should be adequate to ensure the effective implementation of the VIVE Guiding Principles
- A documented process for training key personnel which includes:
  - a. Knowledge about how to apply the VIVE Guiding Principles within the Chain of Custody
  - b. Processes for monitoring the VIVE Guiding Principles within the Chain of Custody
  - c. Reporting issues relating to the VIVE Guiding Principles
  - d. Methodology for the implementation of action plans to address any issues relating to the VIVE Guiding Principles
- Procedures in place that ensure the understanding of key personnel, and application of the VIVE Guiding Principles, are kept up to date as the Programme evolves and develops

### ADDITIONAL GUIDANCE

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Every Guiding Principle of VIVE should be covered by a relevantly qualified and authorised member of the Company. These assigned people should have an appropriate understanding of what is required and possess the authority and resources to deliver against this.

## **B7. Prompt Action Issues**

### **GUIDING PRINCIPLE**

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The Company should effectively address Prompt Action Issues related to the VIVE Chain of Custody module.

### **CRITERIA**

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Taking into account its own circumstances and the findings of its VIVE risk assessments, the Company should identify the specific situations related to the VIVE Guiding Principles that require Prompt Action (i.e. issues that need to be addressed immediately).

The Company should be able to demonstrate that the documented processes for addressing Prompt Action Issues are in place and are clear, transparent and effective.

The Company should ensure follow-up is undertaken and documented for all issues that require Prompt Action.

The Company should ensure that there are regular meetings between supervisors, field staff (where applicable), key processing personnel and the VIVE Coordinator/VIVE Team to discuss, follow-up and provide feedback on the issues identified. The number, type and status of Prompt Action Issues should be recorded, collated and available for these meetings.

The Company should keep records of all Prompt Action Issues and their resolution status. This should be included in the VIVE Team's minutes.

### **ADDITIONAL GUIDANCE**

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Identified Prompt Action Issues should be derived from the risk assessment process and should also include, but are not limited to, the following:

- The Chain of Custody for VIVE products has been broken
- The food safety of VIVE products has been jeopardised
- The identity of products with VIVE status is in doubt

## B8. Unannounced Visits

### GUIDING PRINCIPLE

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To ensure the validity of collected data, the Company should carry out unannounced visits along its supply chain, using suitably qualified individuals who do not regularly visit those steps in the supply chain.

### CRITERIA

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The Company should ensure that the Unannounced Visit programme is effective in confirming whether or not any data gathered to evidence the implementation of VIVE is reflected in day-to-day activities. The goal is to confirm that data collection is effective and any decisions are based on accurate information.

Unannounced Visits should examine example topics from each of the relevant Pillars and include some questions where the information is relatively simple to collect (e.g. by visual inspection) and others where the information is more challenging to collect (e.g. requiring the review of records or detailed discussion with relevant personnel).

All steps in the supply chain for VIVE products should be subject to Unannounced Visits and should:

- Be completed by personnel with a good understanding of both VIVE and the areas being visited
- Be completed by personnel with no day-to-day responsibility for the areas being visited
- Be completed with a minimum possible notification time to ensure an accurate reflection of the true VIVE status
- Be designed to ensure that the accuracy is verified of all the personnel collecting data from the various steps in the supply chain

# USE OF THIRD PARTIES

# C. Use of Third Parties

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## CI. Third Party Service Providers

### OBJECTIVE

The Company should ensure that when it outsources services to third parties, the relevant Guiding Principles of the VIVE Chain of Custody module continue to be applied at all steps of the supply chain for which it is responsible.

## CI.I Performance of Service Providers

### GUIDING PRINCIPLE

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The Company should develop and document procedures for ensuring that any providers of services to the Company (including transport, storage, handling and packing) that may have direct influence over the status and integrity of VIVE products are approved and controlled.

### CRITERIA

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The Company should provide its Service Providers with written details that address the Criteria of VIVE relevant to the services they supply.

Prior to placing VIVE business with them, the Company should evaluate all its Service Providers for their ability to meet the Guiding Principles of VIVE relevant to the services they provide.

The Company should record the performance of its Service Providers against the relevant Criteria of VIVE.

The Company should review the performance of each of its Service Providers against the relevant Criteria of VIVE at least annually. The Company's scores in the VIVE On-line System should then be adjusted where necessary.

The Company should maintain a record of those Service Providers it has approved to participate in its VIVE Chain of Custody and ensure only these providers are used for handling VIVE products.

### ADDITIONAL GUIDANCE

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There is no requirement to either quote directly from VIVE or to mention VIVE by name in contracts or other documents shared with Service Providers. However, the Company should be able to demonstrate to what extent the Criteria of VIVE are being met by its Service Providers.