1. Objective

To establish guidelines for an effective and impartial receipt, treatment and record of complaints.

2. Applicability

This procedure applies to any complaint against any certification/verification process of IBD, regarding any certification/verification scheme, received by any means (telephone, mail, e-mail, fax...).

Complaint is defined as expression of dissatisfaction, other than appeal, expressed by clients or other parties, regarding IBD's certification/verification activities.

3. Reference standards

Always consider the last applicable version:

- ISO/IEC 17065
- European Regulation (EU)2018/848 and associated regulations
- USDA organic regulation, CFR Part 205 – National Organic Program – 205.661
- IFOAM Accreditation Requirements
- RSPO P&C/SC Certification Systems
- 4C complaint procedure regarding verifications
- NATRUE Requirements for Certification Bodies
- ROC^{TM} Certification Body Requirements

4. Associated Quality System documents

- Complaints protocol (doc. 5_1_1)
- Complaint Registration Form (doc. 8_7_6)
- Procedure for investigation of suspicion of irregularities and/or contamination (P_INV)
- Investigation Protocol of suspicion of irregularity (doc. 5_1_7)

5. Involved areas

- Quality management
- Certification management

6. Authorities and responsibilities

- Complaint evaluation and treatment: assigned evaluators
- Follow-up approval, confirmation of complaint closure and preventive actions: Quality Manager
- Maintenance of complaint records: Quality assistant

7. Procedure

a. Complaint reception

Any staff member may receive complaints.

All complaints must be reported immediately in writing to the Quality Manager, Quality Assistant and Certification Manager in charge of the activity or the process object of the complaint.

b. Complaint evaluation and treatment

The Quality Manager (or its hierarchical superior, in case he/she is object of the complaint) must evaluate if the complaint is relevant. If not, it is not necessary to fill out a Complaint Protocol (doc. 5_1_1) nor open a Complaint Project in VEGAS, however a complaint number must be generated, indicated as “unfounded” in the Complaint Registration Form (doc. 8_7_6) and a folder with records of the complaint, justification for considering unfounded, reply to complainer and possible follow-up shall be saved in IBD electronic system.

If yes, the Quality Manager must assign at least one person accountable for verifying all necessary information of the complaint and implement all relevant corrective actions and/or measures until complete resolution. When the complaint is related to a suspicion of irregularity or contamination of an organic product, the assigned person shall conduct an investigation according to IBD Procedure for investigation of suspicion of irregularities and/or contamination (P_INV), and fill in the corresponding Investigation Protocol (doc. 5_1_7).

The Quality Assistant or the Quality Manager starts filling in the Complaint Protocol (doc. 5_1_1), the Complaint Registration Form (doc. 8_7_6), opens a Complaint Project in VEGAS, acknowledges receipt formally, informing the protocol number to the complainant (except when the complainant did not inform contact information), and, in case of suspicion of irregularity or contamination of an IBD certified product, also opens an Investigation Project in VEGAS.

All the decision process to solve the complaint must be reviewed and approved by the Quality Manager, or in its absence, by person not involved in the certification activities related to the complaint.

To ensure that there is no conflict of interest, the Quality Manager, or in its absence the person who reviews and approves the resolution of a complaint, must not have provided any consultancy to the complainant in the last two years before the complaint.

The Quality Manager (or its hierarchical superior, in case he/she is object of the complaint) is responsible for controlling the treatment given to the complaint within established deadlines by

means of a Complaint Project opened in VEGAS, confirming the closure and implementing preventive actions in accordance with the Occurrence For Improvement Procedure (8_P_OPM), if applicable.

Upon closure of the complaint's treatment, the result must be reported to the complainant, in order not to place the confidentiality of the parties involved at risk.

The Quality Assistant must maintain the Complaint Registration Form (doc. 8_7_6) duly updated as the complaint progresses.

c. Deadlines

Complaints must be evaluated and treated as soon as possible, within a maximum deadline of 60 days. If it is not possible to conclude the treatment within this deadline, the complainant must be informed of the complaint status.

For RSPO, in case of complaints regarding the provision of service, the certifier must communicate the accreditation body within seven days and seek resolution of the problem within 60 days. Failure to resolve the complaint within this time limit, the certifier shall immediately notify the accreditation body.

If the complaint refers to the conditions of RSPO membership IBD will inform the RSPO Secretariat if a resolution was not achieved within 60 days.

For the 4C scheme, any complaint must be notified by the client within 15 days and solved within 30 days from the sending of the result. Otherwise, a request of Formal Dispute may be sent by the client to the 4C secretariat. In this case, the evaluation process is placed under the exclusive responsibility of 4C.

For the CE/EU scheme, any notification of irregularity received in OFIS system (Organic Farming Information System), shall be investigated and replied in OFIS within 30 calendar days, providing any further information available and/or requested by the notifying Member State.

For ROC™, IBD shall report all complaints to the ROA. If the Certification Body does not meet the timelines and requirements outlined, the complainant may present the complaint to the ROA. The ROA Operations Team will review the actions of the Certification Body.

d. Complaints registration

The finalized Complaint Protocol must be archived in IBD electronic system with all the related documentation, which includes the confirmation of the complaint receipt, the detail of the evaluation, possible follow-up and the communication of the final decision to the complainant.