



***trustea* Sustainable Tea
Foundation Seal on Pack and
Chain of custody Guidelines**



Table of Contents

1	Introduction	3
1.1	<i>trustea</i> Chain of Custody Model related to the seal on pack programme	3
1.2	Applicability	4
1.3	Scope of CoC Implementation	4
1.4	<i>trustea</i> Membership Requirements	4
1.5	Chain of Custody Documents	4
1.6	Labelling and Trademark Policy – Seal on pack	5
1.7	Percentage of Certified Content	5
2.	Chain of Custody Management System	5
3.	Use of the <i>trustea</i> Trademarks	6
4.	Management System for Multi-Site Operators	7
5.	Traceability	7
6.	Modality of Payment	9
7.	Changes/ modifications in Seal on Pack guideline:	9
8.	Legal matters	10
	Annexure A – Chain of Custody(CoC) requirements related to Seal on Pack programme	10

Version Updation

Responsibility for the *trustea* ‘Chain of Custody’ Guidelines is held by the *trustea* Sustainable Tea Foundation. Readers should verify that they are using the latest copy of this (and other related documents). The definitive version of the requirements will be maintained over *trustea* Sustainable Tea Foundation’s website i.e. www.trustea.org

1 Introduction

trustea is an Indian sustainability code and verification system for the tea sector. The Code is working with smallholder tea growers, bought leaf factories, estates and packers to address some of the key challenges in the industry including working conditions, health and safety of tea workers, water pollution, food safety, soil erosion and contamination.

The code enables producers, buyers and others involved in Indian tea businesses to obtain tea that has been produced according to agreed, credible, transparent and measurable criteria. *trustea* is working with smallholder tea growers, bought leaf factories, estates and packers to address issues such as poor working conditions, health and safety of tea workers, water pollution, food safety, soil erosion and contamination, gender issues and adverse effects of climate change.

The *trustea Chain of Custody (CoC) Guidelines* set out requirements for organisations in the supply chain who are buying or selling *trustea* certified tea. Between the grower and the manufacturer, this includes tea produced from licensed tea grower in accordance with the *trustea* code compliance which must be kept segregated from conventional tea. *trustea* certified tea refers to the tea that are bought or sold with a '*trustea*' claim.

The CoC Guidelines are the key framework that connects demand with supply of *trustea* certified tea and helps to sustainably transform the Indian tea industry for the benefit of consumers, workers, farmers and the environment.

1.1 *trustea* Chain of Custody Model related to the seal on pack programme

The *trustea* CoC Guidelines define and explain CoC model. At the beginning, the packers need to declare the volume of *trustea* certified tea that they plan to procure during the particular financial year. Between the growers and the manufacturer, *trustea* requires a track and trace model. This means that producers and manufacturer need to store, transport and process *trustea* certified tea separately from any conventional tea. This ensures that all *trustea* certified tea can be traced back to licensed estates and bought leaf factories.

Chain of Custody Model includes the following.

- *trustea* certified tea and conventional tea must be physically segregated at all stages of harvest, storage, transport and processing at the farm. At the factory level, in case the content of retail pack is less than 100% of certified tea, segregation has to be maintained till the batch mixing.
- In case of retail packs where 100% *trustea* certified tea is packed, the processing of such packs should be done separately in order to distinguish them from the rest and to maintain the segregation level.
- No mixing or substitution between conventional tea and *trustea* certified tea is permitted beyond the packers pre-determined content.
- *trustea* tea must be clearly identifiable (e.g. with signage and documentation).

- *trustea* **Seal on Pack** marked tea packets sold by packers must be composed of at least 50% certified tea (in the packets) from licensed tea producers (produced in compliance with the *trustea* certified principles and criteria), and must be traceable back to *trustea* licensed producers.
- The packers need to develop a scale-up plan with *trustea* towards attaining a minimum of 90% certified tea in the packets.

1.2 Applicability

The *trustea* Sustainable Tea Foundation Seal on Pack and related CoC Guidelines are applicable to supply chain organisations that are buying or selling *trustea* certified tea and those participating in the seal on pack programme. These include growers, manufacturers, blenders and packers.

1.3 Scope of CoC Implementation

The Chain of Custody Standard applies to all Supply Chain Actors (SCAs) who trade and/or process a *trustea* certified product. Tea processors will implement the CoC model at Product Level, and the *trustea* certified tea CoC requirements and data will be maintained at each level i.e. growers, manufacturers, blenders and packers. The packers who adhere to these guidelines related to the Seal on Pack will be entitled to display the *trustea* Seal on Pack subject to signing formal Seal on Pack membership agreement with Trustea Sustainable Tea Foundation, the owner of all intellectual property rights related to the program and marks of *trustea*.

1.4 *trustea* Membership Requirements

The organisations handling or sourcing *trustea* certified tea are required to be *trustea* members. All tea processing units need to be listed with and trained by Implementation partners and must use *trustea*'s online system known as 'tracetea' to enter their purchases and sales relating to *trustea* certified tea. Gardens processing *trustea* tea are subject to the requirements of the *trustea*'s Agreement (available over the *trustea*'s website). In an interim period to be defined by the programme, paper based trace and track programs are acceptable with prior intimation and concurrence of the Trustea Sustainable Tea Foundation.

1.5 Chain of Custody Documents

The following documents form a suite of tools to support organisations in implementing the *trustea* CoC. These include the following.

- *trustea* Seal on Pack and Chain of Custody Guidelines
- *trustea* Agreement
- *trustea* Platform – training modules (available to *trustea* members and registered traceability system users)
- *trustea* Claims Framework
- *trustea* Code of Practice (applicable to *trustea* members only)
- Additional guidance and FAQs available on the *trustea* website

1.6 Labelling and Trademark Policy – Seal on pack

The labelling and Trademark Policy define the requirements for the following.

- On-pack labelling on retail pack
- Off-pack use of the *trustea* trademark e.g. use of the *trustea* trademark on a website, advertisement or corporate report labelling includes all references to *trustea* certified ingredients, both with and without the logo. The correct wording (text claims) is part of the policy as well as details on the correct logo use (colour, positioning, size).

The policy can be found over the *trustea*'s website. Awareness around the policy may be created through promotional materials. The policy may also be availed by contacting the member support team.

1.7 Percentage of Certified Content

The percentage of certified content used in a product determines how the seal may be used. *trustea* encourages businesses to use 100% certified content, as much as possible, in any product bearing the *trustea* seal. Products are only eligible to bear the *trustea* seal when the percentage of certified content stands at least 50%. The minimum 50% content level is considered a starting point.

2. Chain of Custody Management System

The Participating Operator's Chain of Custody Management System includes the planning, procedures and monitoring of the responsible personnel and the relevant documentation for certified products. The Chain of Custody Management System can vary according to the size and complexity of the operation.

2.1 The Participating Operator shall document the control procedures to ensure that its Chain of Custody Management System maintains the integrity of the certified products. The procedures shall include:

- a) A flowchart of the products originating from certified farms with the identification of all processing steps and points where the products from non-certified sources may enter or where certified products may leave the system
- b) Procedures and records for controlling the reception, processing, mixing, storing, packaging, delivery, transport and resale of products coming from certified farms
- c) Responsibilities of the personnel involved with the Chain of Custody Management System
- d) Self-declaration from the entities on adherence to the policy

2.2 The personnel involved with the handling and processing of certified products shall demonstrate that they have been trained and that they have the knowledge and skills to effectively implement the Participating Operator's Chain of Custody Management System.

2.3 The Participating Operator shall not be in material violation of any applicable laws relating to the handling, reception, processing, mixing, storing, packaging, delivery, transport and resale of certified products, including without limitation laws relating to the environment, occupational health and safety, and labour. The Participating Operator shall demonstrate the foregoing by providing a truthful representation as to the foregoing. In case of deviations from the terms of CoC, action will be taken as per the defined protocol.

2.4 The Participating Operator shall implement internal inspection of processes and systems to ensure conformance with this standard. These shall include documented sample based internal inspections once a year towards monitor conformance with the *trustea* Chain of Custody system and a corrective action plan to eliminate nonconformities. This will be supplemented with a third-party verification process by a mutually agreed audit protocol.

2.5 The Participating Operator shall enter into a binding agreement with any contractor to which processing, storing, packaging and/or labelling is outsourced.

2.6 All documents generated to support the Chain of Custody Management System shall be maintained online for a period of at least three (3) years. All relevant records shall be available (in soft copy) to Participating Operator staff and to external auditors.

2.7 The Participating Operator shall document and implement a procedure for receiving and resolving complaints regarding its conformance with this standard.

3. Use of the *trustea* Trademarks

The *trustea* name, logo and *trustea* Certified seal are all registered trademarks of the *trustea Sustainable Tea Foundation*. No Participating Operator can claim that a product is *trustea* Certified without the prior written approval of the *trustea*. Participating Operators may only use *trustea* trademarks in accordance with the rules defined by the *trustea*, and must provide applicable supporting documentation. These guidelines can be found over the *trustea's* website. Awareness around the guidelines may be created through promotional materials. This may also be availed by contacting the member support team.

3.1. The Participating Operator shall enter into a License Agreement (by accepting the terms and conditions online) directly with the *trustea* prior to using any *trustea* trademark.

3.2. The Participating Operator shall obtain and maintain records of prior written approvals granted by the *trustea* for the use of any *trustea* trademark on communication and marketing materials (on or off product) before such materials are issued, published or distributed.

3.3. A Participating Operator shall present evidence that any product bearing the *trustea* Certified seal meets the minimum percentage of certified content or the claim made on the product package.

4. Management System for Multi-Site Operators

This principle only applies to Participating Operators that administer two or more sites and that want to apply for Chain of Custody Certification. Multi-site System Administrators administer sites and are responsible for the evaluation and reporting of the sites. It is the responsibility of the Multi-site System Administrator to determine which sites are included in the scope of the certification and subsequently to ensure that the different sites conform to the *trustea* Chain of Custody system.

4.1. The Multi-site System Administrator shall document and implement an Internal Control System that guarantees conformance of all the individual sites with the *trustea* Chain of Custody system. At a minimum, the Internal Control System shall include the following elements:

- a) An organisational chart illustrating the relationship between the Multi-site System Administrator and each site.
- b) The Multi-site System Administrator shall internally inspect all sites once a year. Annexure A may be referred for further details.
- c) New sites must undergo an internal inspection before being included.
- d) For sites that are not under a common ownership structure, consent from each site (through online mode) acknowledging participation in the certification and granting authority to the Multi-site System Administrator for internal inspection and sanction.

4.2. The Multi-site System Administrator shall keep records of the sites included in the scope of its Chain of Custody certificate, including:

- a) A list of sites including name, location, type of processing, and responsible personnel
- b) Status of internal inspections and external audit
- c) Identification of the sanctioned sites

4.3. The Multi-site System Administrator's Internal Control System shall document and implement procedures for sanctioning sites that do not comply with the *trustea* Chain of Custody system. Each site shall be informed of the sanction system. A system of progressively more serious sanction measures shall be established, concluding with the exclusion of a site from the Chain of Custody certificate scope.

5. Traceability

Products from certified farms are traceable throughout the supply chain of the Participating Operator using pre-established and self-sufficient procedures that identify the history, location and movements of the product or batches of products. The identity of these products can be distinguished from non-certified products visually, in time and/or via documentation and records available over the system.

5.1. The Participating Operator shall demonstrate that the certified products handled in its facilities are covered by internal procedures to preserve the product's integrity in accordance with the Participating Operator's claim.

5.2. The Participating Operator shall implement a system for identifying the certified products.

5.3. The Participating Operator shall demonstrate that Transaction Certificates are requested and issued through online record repository, when required by the *trustea*.

5.4. The Participating Operator shall develop and maintain records to document quantities of product from certified farms for the following.

- a) Purchased as inputs
- b) Inputs and outputs in stock
- c) Outputs sold

5.5. The Participating Operator shall check supplier documentation to ensure it includes one of the following.

- a) A copy of a Transaction Certificate(s) from the *trustea* or associated Transaction Certificate number(s)
- b) Supporting documentation (supply contracts, invoices, delivery documents etc.) that indicates the Participating Operator's claim for the product(s) purchased.

5.6. The Participating Operator shall provide claim information to its customers, including:

- a) A copy of a Transaction Certificate(s) from the *trustea* or associated Transaction Certificate number(s) or
- b) Supporting documentation (supply contracts, invoices, delivery documents, etc.) to indicate the Participating Operator's claim for the product(s) sold and
- c) When an unlabelled product is sold that contains less than 90% *trustea* Certified content, the Participating Operator shall indicate the certified percentage.

tracetea is a mobile and web-based tea traceability system powered by *trustea* to trace the complete tea supply chain from grower to factory exit invoice. Growers, Aggregators, transporter, factories and buyers are the users of this application.



For *trustea* certified entities e.g. estates, BLFs it is encouraged to use tracetea (although physical recordkeeping is also acceptable) for the processes related to *trustea* so that the product could be traced all the way back to the producer/producer group that it originates from. The tracetea will be rolled out in phase-wise manner. For packers, its mandatory to use tracetea. From 2021 onwards, tracetea is mandatory for new BLF entrants.

Application Feature	Benefit
<ul style="list-style-type: none"> ✓ Covering Grower to factory Exit Gate ✓ Forward & Backward Traceability i.e. from Grower to Factory Exit Invoice and Invoice to Grower ✓ QR Code based grower authentication ✓ Application for Plant Protection Code (PPC) Compliance ✓ Agriculture Advisory Desk for Grower ✓ Mobile & Web based System ✓ Open Source & less resource hungry system ✓ On and Off – line operating mode 	<ul style="list-style-type: none"> ✓ All players in the tea supply chain want to demonstrate their commitment to tea quality and safety, and assure the reliability of their suppliers. ✓ A tea chain traceability standard helps map and document a product’s history from the farmer to retail packet creating trust and confidence across the tea supply chain. ✓ Traceability prevents or tracks any mixing of certified and non-certified product at every stage of the process, ensuring that the certified product leaving the factory is the same certified product that entered that originated from the certified farmer

6. Modality of Payment

At the beginning, the packers need to declare the volume of *trustea* certified tea that they plan to procure during a particular financial year. Depending on the agreed fee for seal on pack, the packers will pay 50% of total estimated amount in advance, 3 months prior to the commencement of the accounting period towards ensuring continuity of the services. The remaining 50% amount needs to be paid at the beginning of the second quarter. Thus the packers need to pay twice a year at an interval of 6 months.

The calculations for payment will be based on the data that is being captured in the *tracetea* application after verification by both i.e. the packer and *trustea*. Once the financial year concludes, the actual volume of *trustea* certified tea procured by the respective packers during the year, will be calculated. Any difference in the amount already paid by the packer based on the estimated volume vis-à-vis the amount payable by the packer in line with the actual volume procured, will get adjusted while the packer makes the payment for the next financial year.

The above payment mechanism will be followed for all the subsequent years. The members of the seal on pack programme may be assessed for compliance to these guidelines by the *trustea* foundation or any other competent third party assessor with mutual agreement and prior consent, in line with the principles mentioned in annexure A.

7. Changes/ modifications in Seal on Pack guideline:

Subsequent to the adoption of the CoC this guideline, any changes/ modifications will have to be approved by *trustea* Sustainable Tea Foundation's Council.

8. Legal matters

Any legal matters pertaining to this guideline will fall under the jurisdiction of courts in Kolkata.

Annexure A – Chain of Custody(CoC) requirements related to Seal on Pack programme

The entities may refer to the following principles:

- The entity shall have a system for maintaining the CoC, as defined by *trustea* and recorded in the *tracetea* system.
- The entity shall maintain up-to-date procedures that clearly delegate responsibilities by assigning the overall responsibility to one person for compliance to the standards.
- The entity shall ensure all the applicable requirements related to the standards are properly documented.
- The entity shall designate responsible positions or individuals for each component of the CoC e.g. forms, records, documents, along with instructions for compiling and filing them, including a process for annually reviewing and updating them.
- All relevant staff of the entity should be trained on maintaining the integrity of verified material throughout the production and distribution process.
- The entity shall keep up-to-date register of all applicable business registration, tax, transport laws and maintain records of their compliance.
- The entity shall maintain the updated documents and records demonstrating compliance to all sections of the standards for at least 4 years.
- The entity shall correctly classify products upon purchase and receipt.
- The entity shall employ a secure system of physical separation for all verified products to be sold.
- The entity shall clearly identify certified products throughout production and/or processing by maintaining segregation.
- The entity shall plan and implement production activities at clearly distinct times.
- The entity shall maintain up-to-date records of products distributed and/or sold with *trustea* claim.
- The entity shall maintain a general description of the product and composition contained within it.
- For each product, the entity shall maintain all applicable records demonstrating the legal sale, transport of all the verified products as utilised.
- The entity shall maintain an up-to-date account of all input and output quantities of certified products. The entity's purchases, inventory in stock, and final sales to customers shall be calculated on a monthly basis.
- The entity shall have a system for identifying all certified components and products that are sold, shipped and/or transferred to other entities.