Policy Title: Higg FEM Verifier Body Program Requirements
Policy Number: VPM - 012
Issue Date: July 24, 2020
Revision Date: March 1, 2021
Revision No.: 1.1
Authorization: Sustainable Apparel Coalition
Distribution: Internal – All
External – All potential and current Eligible FEM Verifier Bodies

Introduction

This document outlines the requirements that SAC approved Higg FEM Verifier Bodies (VBs) must meet to maintain their status as approved VBs in the SAC Higg Facility Environmental Module (FEM) Program.

Scope

This document applies to all SAC approved Higg FEM VBs.

General Requirements

1. General Requirements
   1.1. VBs are subject to the Quality Assurance procedures outlined in the QA Manual.
   1.2. VBs must meet the requirements below for every country where they provide Higg FEM verification services.
   1.3. VBs must be able to demonstrate implementation of the below requirements through documentation and records.

Resource & Personnel Requirements

2. Competence
   2.1. VBs must have procedures that address how VBs ensure Verifiers meet the SAC FEM Verifier requirements.
   2.2. Competency requirements must also cover non-assessor staff.
       2.2.1. Report reviewers must have received training on SAC protocols and have demonstrated knowledge of technical environmental subject matter and assessment. Note: reviewers do not necessarily need to be Verifiers.
       2.2.2. Program support staff must have an understanding of FEM protocols and requirements.
   2.3. VBs must maintain records that demonstrate how competence requirements are met for Verifiers and other FEM program staff.

Note: The SAC specifies eligibility criteria for FEM Verifiers, however VBs must not simply rely on the FEM Verifier application process for qualifying Verifiers. VBs may directly reference or incorporate SAC qualifications into their procedures, however VB procedures must demonstrate how verifiers meet established internal criteria. VBs must maintain records showing that all Verifiers meet internal competency requirements.
3. Training
3.1 VBs must have procedures on how they provide onboarding training on the FEM Verification Program.
   3.1.1 Onboarding training must be provided to new hires and currently employed assessors who become FEM Verifiers. This must be provided in addition to the required e-learning for Verifiers.
   3.1.2 Global/Standardized onboarding training procedures may be used, but onboarding training must cover the FEM Program specifically.
   3.1.3 Procedures must define the length of FEM onboarding training.
3.2 VBs must provide all Verifiers with ongoing training on the FEM Verification Program.
   3.2.1 This training must be provided at minimum once a year.
   3.2.2 This training must be linked to the outcomes of performance monitoring (see Section 4 below).
   3.2.3 Ongoing training must be provided if there are significant changes to the FEM Verification Program.
3.3 VBs must maintain records that show all Verifiers have undergone onboarding and ongoing training.
3.4 VBs are responsible for ensuring trainings are effective. SAC does not define the length, format and content for these trainings.

4. Performance Monitoring
4.1 VBs must have procedures for monitoring Verifier performance.
   4.1.1 VBs must conduct an internal quality review of 100% of FEM Verifications before the reports are completed (i.e. put into VRC status).
4.2 VBs must define the actions they take when Verifier performance is less than acceptable.
   4.2.1 At minimum, VBs must require ongoing training and conduct an observation of the Verifier in the field if performance is less than acceptable.
4.3 SAC FEM Verifier Scoring must be taken into account in performance monitoring. See the FEM QA Manual for details on Verifier Scoring.
4.4 Global procedures for performance monitoring covering multiple schemes may be used, but VBs must be able to demonstrate how the FEM program is covered.

Note: The VPM’s QA activities result in Verifier Scores, which are made available to VBs. VBs must consider Verifier Scores as part of performance monitoring; however, VBs must not only rely on the VPM’s QA activities for the VBs internal performance monitoring process.

5. Calibration
5.1 VBs must have methods to ensure the consistency of FEM verification outcomes among Verifiers.
5.2 Calibrations ensure verifications are conducted consistently. Performance monitoring activities should be used to identify where calibration is needed.
5.3 A documented procedure on calibration is not required if VBs can describe and demonstrate their internal measures for calibration.
5.4 Ongoing training and performance monitoring can be used to meet this requirement if VBs can demonstrate how the outcomes of these activities are used to calibrate Verifiers.

6. Knowledge of FEM Subject Areas
6.1 VBs must make available to Verifiers up-to-date, appropriate resources on environmental subject matter covered by the FEM and applicable country-specific laws.
6.2 Verifiers must understand what resources are available and be able to access this information before or during a verification.

Verifier Status Maintenance

7. Verifier Status Maintenance (VSM)
7.1. Once an individual is approved as a Verifier, they are required to maintain their status annually.
7.2. Status maintenance is demonstrated by completion of recognized professional development activities defined in the VSM procedures that can be found on the VSM Program Information Page.
7.3. Annually, each Verifier must submit a VSM Worksheet for review and approval by the VPM. VSM worksheets are available on and submitted through the STEP platform.
   7.3.1. Generalist Verifiers who are also Chemical Specialists Verifiers only submit one (1) VSM worksheet. Both statuses are renewed through a single VSM process.
7.4. Verifiers have a 30-day grace period after the one-year anniversary of approval (giving them 12 to 13 months of total approval period).
7.5. Candidates whose verifier status has expired, must following the process below to reactivate their status:

<table>
<thead>
<tr>
<th>If Verifier Status has expired (without reason) or been suspended due to:</th>
<th>Reactivation Timeline</th>
<th>Process/Fee:</th>
</tr>
</thead>
</table>
| Failure to complete Verifier Status Maintenance (VSM) requirements including: VSM worksheet and any required FEM training | After status expiration date and up to 6 months after expiration date | ▪ Submitting written request to VPM  
▪ Completion of any required FEM related training (i.e. If training has been revised or updated)  
▪ Submittal of VSM Worksheet covering the prior 12 months immediately preceding the reactivation request  
▪ Subject to automatic audit/verification of VSM-related material  
▪ Must pay $200 re-activation fee plus the VSM fee |

Note: Cases where a Verifier’s status has expired for more than 6 months will be reviewed by the VPM to determine the suitable path and requirements for status reactivation.

Part-time or Subcontracted FEM Verifiers

8. Freelance Verifiers
8.1. SAC prohibits the use of ‘freelance’ verifiers. ‘Freelance’ means the verifier is not a direct employee of the VB and is free to work as a contractor for any company that wishes to hire them.
9. Part-time or subcontracted Verifier

9.1. Use of part-time or subcontracted Verifiers is permitted ONLY if the following conditions are met:

9.1.1. Verifier works on a subcontracted/part-time basis exclusively for one (1) VB for the purpose of performing FEM verifications.

9.1.2. Part-time or subcontracted Verifier is not employed (in any capacity e.g., contract, full or part-time) at a manufacturer in the textile, footwear, apparel, home textiles, leather, outdoor equipment, chemicals industry or at any other type of employer which may create a conflict of interest.

9.2. The SAC reserves the right to review and disqualify part-time or subcontracted verifiers based on their other employment relationships.

9.3. If using part-time or subcontracted Verifiers, the VB must exercise and enforce the same criteria as when utilizing full time employees.

9.3.1. The VB’s FEM policies and procedures on Verifier qualifications, internal training, performance monitoring, calibration and ethics/integrity must be applied to part-time and subcontracted Verifiers.

9.3.2. Any part-time/subcontracted Verifier must also be covered by the VB’s Professional Liability Insurance coverage; and/or Indemnification; and Terms listed in the VB Agreement.

9.4. It is the responsibility of Verifier Bodies to inform the VPM of any Verifiers that are considered sub-contractors. Failure to disclose this information can lead to loss of Verifier Body status.

9.5. Sub-contractors must have an official email address from the associated Verifier Body for official SAC communications. Verifier Applications will not be accepted for individuals who do not have an assigned company email address (e.g. use Gmail, Hotmail, Yahoo email domains).

9.6. VBs must maintain documentation that demonstrates how any subcontracted/part-time Verifiers meet these requirements. This documentation may include subcontracting agreements; Internal training logs for part-time/subcontracted Verifiers; affidavits/documentation from insurer indicating coverage of such Verifiers; Performance Monitoring results for part-time/subcontracted Verifiers.

Use of Translators

10. Translator Qualifications

10.1. VBs must have a procedure for vetting translators to ensure they are trained in and understand environmental sustainability subject matter.

10.2. VB is responsible to ensure that translators understand and abide by the VB’s internal Code of Conduct, confidentiality requirements and all applicable terms of the SAC Verifier Code of Professional Conduct.

10.3. Additional Guidance on the use of Translators is provided in Appendix I.

Ethics and Integrity

11. Ethics and Integrity Procedures

11.1. VBs must have a professional Code of Conduct that covers ethics, integrity and impartiality.

11.2. Verifiers must receive and understand the Code of Conduct.

11.3. VBs must provide annual training on ethics and integrity.

11.4. VBs must have procedures that address how Verifiers can raise concerns about ethical issues, including bribery.
12. Impartiality
12.1 VBs must undertake regular assessment of threats to impartiality and of the conflicts of interest that arise when providing Higg FEM services. Conflicts of interest can arise from a VB’s relationship with its clients and unrelated bodies or from its relationship with related bodies.
12.1.1 For each FEM verification a VB undertakes, they must ensure there are no conflicts of interest that arise from a past or present relationship between the facility and the Verifier(s) and/or VB.
12.2 The VB must document all possible conflicts of interest that relate to provision of Higg FEM services and make this documentation available to SAC and/or the VPM upon request.
12.3 VBs must be able to demonstrate how they eliminate or control any threats to impartiality or conflicts of interest.
12.4 If a Verifier(s) engaged in consulting work (including but not limited to advisory and training services) at a facility, they are prohibited from conducting verification of that facility’s FEM for 2 years.

Provision of Training

13. Facility Training
13.1 VBs may not provide external training to facilities on the Higg FEM unless they are approved as a SAC Higg FEM Training Body.
13.2 VBs that wish to provide external training to facilities should apply through the Training Program Manager (TPM) to become a Trainer Body.

Changes to VB Staffing

14. Informing the VPM of staff changes
14.1 If a Verifier ceases to be employed by a VB, the VB must inform the VPM immediately by emailing SAC@sumerra.com.

15. Transfer of FEM Verifier approvals
15.1 VBs that hire an existing Verifier can maintain their approval status. Reapplication is not required if a Verifier transfers from one approved VB to another.
15.2 To maintain approval status, the Verifier or VB must complete this form.

Payment of SAC Fees

16. VB Fees
16.1 All VBs (SAC members and non-members) are required to pay an application fee.
16.2 Non-member VBs are required to pay an initial program fee after being deemed eligible to become a VB and an annual program fee in subsequent years.
16.2.1 The annual program fee is due by March 31st each year.
16.2.2 If a VB becomes approved and pays the initial program fee after June 30th, the annual program fee for the following year will be due June 30th. In subsequent years, the annual fee will be due on March 31st each year.

16.3 Failure to pay the annual program fee in a timely manner can result in immediate termination of the VB approval.

16.4 Current fees are maintained here.

17. Penalties for non-payment of Annual Program Fee

17.1 If a VB fails to pay the program fee on time the VPM will monitor non-payment of fees and implement the following actions:

17.1.1 Invoice unpaid after 90 days: the VPM will issue the VB with a warning that failure to pay will result in suspension of the VB from the FEM Program.

17.1.2 Invoice unpaid after 120 days: the VPM will inform the VB that they have been temporarily suspended from the FEM Program. The VB will be able to complete any assigned verifications but will not be permitted to be selected for new verifications until payment is received.

17.1.3 Invoice unpaid after 150 days: the VB’s status will be reviewed by the SAC and VPM, which may result in the VB being permanently suspended from the FEM Program.

17.1.4 Repeated late payment of fees: VBs that are consistently late in paying their Program Fee invoices (if two or more invoices are not paid within 60 days) will also be subject to a warning and at risk of suspension if further invoices are not paid on time.
Appendix I – Guidance on the Use of Translators for Higg FEM Verification

The SAC no longer provides country-specific approval for Verifier Bodies (VB) or Individual Verifiers. This allows VBs to serve clients in all countries/regions including using non-local Verifiers where necessary. Generally, ‘non-local’ means that the verifier is not a native citizen or resident of the country and/or does not speak the local language(s) of facility staff. In cases were non-local Verifiers perform Verification (on or off-site), the use of Translators is required.

The following guidance outlines the SACs expectations for the use of Translators:

- Prior to assigning a Verifier, the VB shall verify with facility staff the language(s) spoken by relevant facility personnel (including management and employee level staff), as well as the languages in which all relevant documents are written.
- Translators should be used if Verifiers do not speak the language(s) spoken by a significant percentage of relevant facility staff and/or if the relevant supporting documentation is in a language that the Verifier is not able read fluently.
- Translators do not need to be Higg FEM Verifiers and may be an employee of the VB, third party translation service providers or a freelance individual.
- The VB must ensure that the Translator is competent and understands the technical content and terminology of the Higg FEM.
- Translators must work under the direct supervision of the Verifier and may not conduct any part of the Verification themselves.
- The VB is responsible to ensure that Translators understand and abide by the VBs internal Code of Conduct and all applicable terms of the SAC Verifier Code of Professional Conduct.

It is the also responsibility of Verifier Bodies to ensure the non-local verifiers are familiar with applicable environmental legislation and norms in countries where they perform Verifications.

Verifications conducted by non-local auditors may be subject to additional QA reviews by the VPM and failure to ensure a high-quality verification by a non-local verifier will reflect negatively on VB and Verifier scoring and may result in additional actions from the SAC including removal of VB or Verifier status.

Additionally, documentation may be requested or required by the VPM to verify the above including but not limited to:

- Internal procedures or policies regarding the use of Translators
- Excerpts from contracts or service agreements (specifically relating to above noted obligations)
- Documented qualifications and experience of Translators (e.g., education, accreditations)
- Other documentation deemed necessary to determine the Translators competence or understanding of Higg FEM content or Terminology.