SUSTAINABLE WA

Sustainable WA Certified Program Manual

BETA VERSION

Version 1.0

March 8, 2022

Table of Contents

1.0 Introduction

The purpose of the *Sustainable WA Program Manual* is to provide an overview of Sustainable WA and associated certification process to align understandings across the user roles of program administrators, program participants, certifiers, and auditors. The Sustainable WA Winegrape Standard is the basis for the certification process and can be found <u>here</u>.

Sustainable WA was created through consultations and meetings of a multi-stakeholder industry group over the course of 2021 with program development support from SureHarvest, a sustainability consultancy and technology provider. The foundation the Sustainable WA Winegrape Standard was built on the Washington wine industry's Vinewise® online guide to sustainable winegrape growing. The Vinewise® guide was written nearly two decades ago and revised in 2017 as part of a WSDA grant funded project to expand the scope of the winegrape grower self-assessment based on extensive feedback received from stakeholders. Vinewise® was developed for the industry, by the industry, meaning a steering committee of leading Washington state growers and vintners, with the support of Washington State University extension staff and researchers, developed the guide and validated it as maintaining a sustainable balance of people, planet and prosperity.

1.1 Program Governance

Governance Council

The Sustainable WA Governance Council is the governing body responsible for overseeing the program[1], including oversight of budget, industry buy-in, and general progress, as well as making decisions on revisions to the Sustainable WA Winegrape Standard and certification process. The Governance Council will review relevant program components including the standards, the auditor training module, the program manual, and the application form and claims guidance. The Governance Council includes one representative from the Washington State Wine Commission, Washington Wine Institute, Washington Wine Industry Foundation, the Washington Winegrowers, and a to be filled position. This open position will be affiliated with civil society, academia, and regulators/government. Consideration of operation size will factor into representation to ensure diverse needs and perspectives are represented. The size of the Governance Council must be at least five spots but can increase if directed by the Council.

The Governance Council may form relevant subcommittees as need arises. A current active subcommittee is the Technical Subcommittee, which is responsible for decisions relating to program requirements and process, and a marketing and communications subcommittee may be formed to support ongoing outreach and branding. The Technical Subcommittee is populated with subject matter experts charged with thoroughly reviewing the standards annually to address adapting the standard to respond to pest and disease pressures, technical issues, and ensure the program is aligned with cutting-edge research and sustainability best practices.

Program Administrator

The Sustainable WA Program Administrator is responsible for the day-to-day operations of the program. Washington Winegrowers, a 501(c)6 non-profit organization, functions as the Program Administrator. Functions of the Program Administrator include:

- Main point of contact for interested program participants;

---

[1] *Note:* Being a program of the Washington Winegrowers, the Washington Winegrowers board of directors has final authority and discretion over all program elements.

- Review and approval of program participant applications;
- Issuing certificates[2] to participants who achieve certification requirements;
- Oversight and tracking all steps of certification process;
- Carrying out annual review and updates of all program materials; and,
- Manages the standard and is responsible for facilitating all revision processes.

2.0 Certification Process Overview

The Sustainable WA certification process involves a sequential set of steps, each of which has associated activities and outcomes. The Program Administrator, program participants, and certifiers, along with the third-party auditors assigned by certifiers to evaluate program participants' conformance to the Sustainable WA Winegrape Standard, are all responsible for carrying out various activities at each step in the certification process.
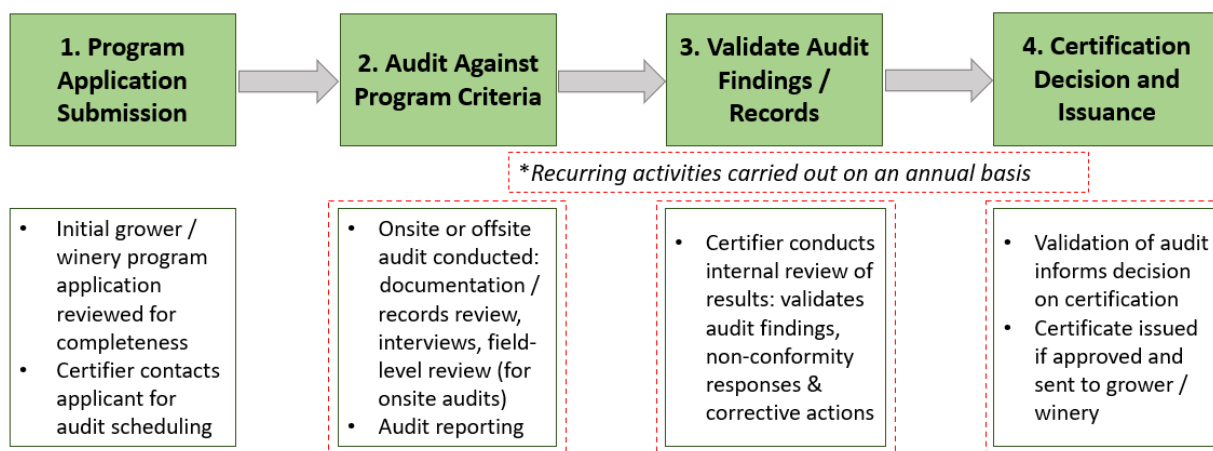
1. Program Application Submission	2. Audit Against Program Criteria	3. Validate Audit Findings / Records	4. Certification Decision and Issuance

Recurring activities carried out on an annual basis

• Initial grower / winery program application reviewed for completeness • Certifier contacts applicant for audit scheduling	• Onsite or offsite audit conducted: documentation / records review, interviews, field-level review (for onsite audits) • Audit reporting	• Certifier conducts internal review of results: validates audit findings, non-conformity responses & corrective actions	• Validation of audit informs decision on certification • Certificate issued if approved and sent to grower / winery

FIGURE 1. Summary of Certification Process.

Further details on each step in the certification process is included in the subsequent sections in this document.

2.1 Program Scope and Eligibility

Sustainable WA focuses on establishing a supply of sustainably grown winegrapes based on third-party audits of winegrape growers' vineyard and workforce management practices. The specific scope of the third-party audit is determined by the grower application submitted, which may include all or only some of their vineyards.

The integrity of the sustainability claim associated with the certified winegrapes is supported in the supply chain using a third-party chain of custody audit for wineries. The chain of custody audit is only applicable for wineries seeking to make claims using the Sustainable WA Certified logo and brand on wines, websites, or printed materials. The chain of custody requirements for certified winegrapes are included in the **Sustainable WA Winegrape Standard**.

---

[2] *Note:* While the Program Administrator is responsible for issuing certificates, third-party certifiers and auditors will confirm program participants meet certification requirements and will close non-conformities.

Program eligibility is defined based on the geographic location of the vineyards included in the application with the requirement that they are situated in the state of Washington or in one of the four cross-state American Viticulture Areas including Oregon and Idaho.

2.2   Program Application

The program application will include general applicant information, vineyard operation information, and other details that support audit scoping. The initial application process for first-time or returning program participants is structured to begin in February of each calendar year. This timing aligns with the approach to grower completion of self-assessments documenting vineyard and workforce management practices for the previous crop year, which provides a basis for the third-party audit. Following the initial application, program participants will need to submit a new application to the program once every three years since updated information is needed to confirm the scope of the onsite audit and to provide an opportunity for participants to increase or decrease their acreage and vineyard blocks enrolled in the program.

A separate scoping confirmation process will be used for current program participants who have a valid certificate. This will confirm whether any changes to acreage or vineyard blocks to be included in the scope of the audit are needed, as well as confirm if any material changes to the operation (e.g., change in the size of the workforce, etc.) have taken place over the last year.

The Program Administrator is responsible for reviewing submitted applications. Once an application has been confirmed as complete, and all application fees have been paid, the application will be approved and forwarded to the certifier.

Please see the application form **here** for more information on the application process.

The timing and approach to the chain of custody application process aligns with the grower application process.
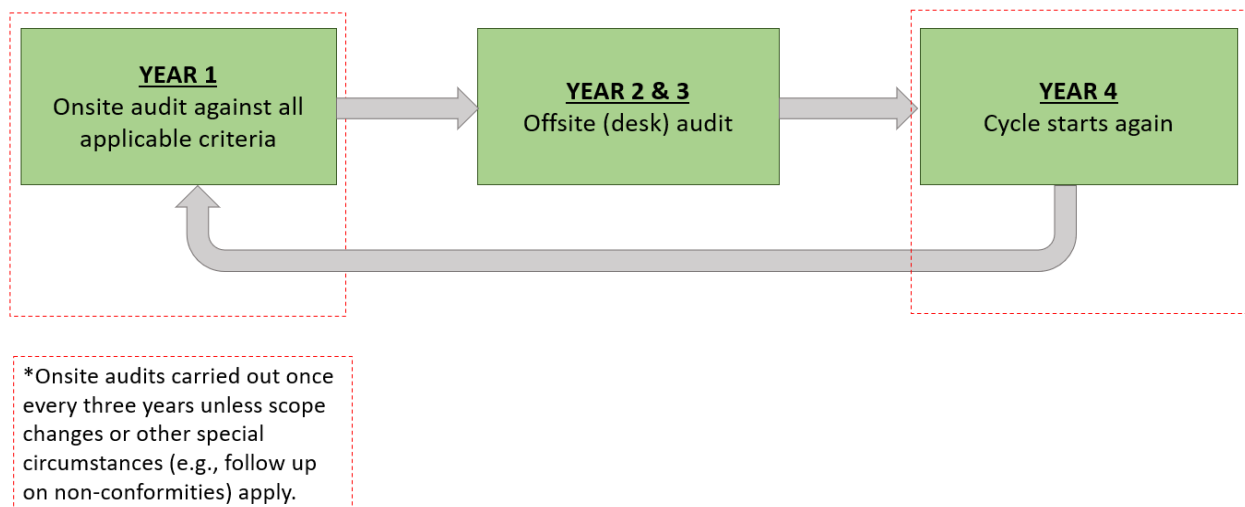
2.3   Third-Party Audit Cycle

YEAR 1
Onsite audit against all applicable criteria

YEAR 2 & 3
Offsite (desk) audit

YEAR 4
Cycle starts again

*Onsite audits carried out once every three years unless scope changes or other special circumstances (e.g., follow up on non-conformities) apply.

FIGURE 2. Summary of Third-Party Audit Cycle. *Note: Onsite audits are conducted in the first year and every three years*, followed by two annual offsite desk-based audits carried out remotely. Certified participants must complete annual self-assessments and follow up on any non-conformities required for certification as identified during audits.*

Sustainable WA operates on a three-year third-party audit cycle with a combination of onsite and desk audits carried out annually. The cycle starts with an onsite audit in the first year and includes offsite audits[3] in the next two years, with the onsite audit process starting again in the fourth year (see **Figure 2**).

3.0 Third-Party Audit Process

An annual third-party audit is required for initial certification in the Sustainable WA program. Certifiers assign qualified auditors (see Section 6 for certifier and auditor requirements) to conduct third-party audits although certifiers may involve other staff members in audit planning and post-audit follow up to coordinate auditor schedules and support review of corrective actions submitted to address any non-conformities identified during the audit. An annual audit process typically involves six steps, which are described in detail in the following sub-sections.
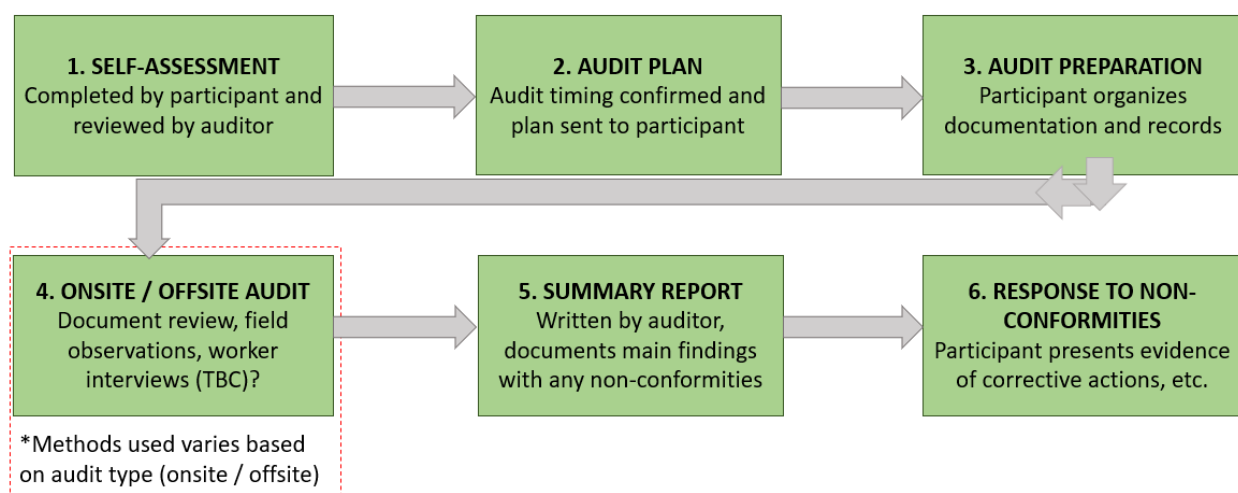

Figure 3: Third-Party Audit Process – Summary of Activities

The following list of activities is provided for the purpose of understanding the approach third-party auditors will use to evaluate a program participant's conformance with the Sustainable WA Winegrape Standard. As additional context, the audit activities listed relate to onsite audits of both vineyard operations and wineries, although chain of custody audits for wineries and related entities are more focused on specific requirements related to handling of certified winegrapes. Offsite audit activities are summarized separately.

Onsite Audit Activities
1. Self-assessment completed to prepare both the participant and the auditor for the onsite audit. Auditor reviews the self-assessment and follows up with any questions.
2. Audit timing confirmed and general audit plan sent to the participant.
3. Participant prepares for the onsite audit organizing documentation/records and works with vineyard manager(s) to ensure workers understand they may be interviewed.
4. Document review and field observations are primary methods used for evaluating the operation(s) conformance to the standard requirements. Worker interviews

---

[3] *Note:* Changes to application scope (e.g., number of vineyards included) and/or other circumstances (e.g., confirmation of corrective actions) may require an onsite audit process during the Year 2 or Year 3.

are to be conducted using a sample of workers for larger workforces and a minimum number of interviews to be carried out to verify conformance.
- Note: Scope of winery worker interviews may be limited given the focus of winery audit requirements on chain of custody and product handling.

5. Summary report with any non-conformities with the standard requirements written by auditor to document findings and sent to client within 30 calendar days.
6. Participant is provided a timeline of 30 calendar days to respond to non-conformities with implementation plans for any needed corrective actions.

Offsite Audit Activities
1. Sample of documents/records related to critical aspects of the standard are requested to support auditor review of the self-assessment.
2. Review of documents/records and self-assessment carried out by auditor.
3. Video-enabled call to interview management and to speak with any other workers at the operation, as needed.
4. Steps 5 and 6 above for onsite audits repeated.

3.1 Self-Assessments

Grower completion of self-assessments documenting vineyard and workforce management practices is required each year as part of the certification process. The self-assessment supports the approach to both onsite and offsite audits in Sustainable WA program. The self-assessment report will be reviewed by auditors in advance of the audit to understand the program participant's practices relative to the requirements in the Sustainable WA Winegrape Standard.

Growers who have previously completed self-assessments in the Vinewise® online platform (**www.sustainablewa.com**) can use their username and password to access the platform and complete self-assessments. New user credentials will otherwise be provided to growers, as needed.

Self-assessments are not currently required for wineries seeking chain of custody certification.

3.2 Audit Plan

The certifier will work with its auditors to develop an audit plan to guide the onsite audit process. The audit plan should include details on audit scope (e.g., vineyards in different locations to be audited), approximate timing for audit activities (e.g., opening meeting, document/records review, worker interviews, site observations) to be carried out, and contact information for auditors or the audit team if more than one auditor will conduct the audit.

For offsite audits, at minimum, an agenda should be provided to structure the overall remote audit process, although use of a formal audit plan is encouraged for the offsite process.

Audit plans should be sent to program participants 30 days, but not less than five days, in advance of audits.

3.3 Audit Preparation

It is the responsibility of the program participant to comply with the requirements in the Sustainable WA Winegrape Standard. In the case of grower participants, the self-assessment process provides an opportunity to prepare for the audit by reviewing current practices and documentation in relation to the requirements in the standard.

All necessary documentation should be prepared in advance of the audit and provided upon request from the auditor. Workers that are either directly and indirectly employed by the vineyard operation should be informed by management that they may be interviewed as part of the audit process. The certifier can provide information on both onsite and offsite audit methods used to collect information and data to evaluate a program participant's conformance with the Sustainable WA Winegrape Standard.

3.4 Onsite and Offsite Audits

All audits are conducted by independent, qualified third-party auditors working for the certifier. Onsite and offsite audits involve an overlapping set of activities; however, a notable difference with onsite audits relates to worker interviews. Aside from the interview process carried out remotely by the auditor with the representatives participating in the audit of the Sustainable WA Winegrape Standard, worker interviews are not typically included in the scope of offsite audits.

Review of Documentation and Records

Different aspects of the Sustainable WA Winegrape Standard refer to documentation and records that should be developed and maintained. In other cases, the documentation or record-keeping requirement may be less explicit. Auditors will need to conduct a review of documents and records during both onsite and offsite audits to assess conformance with the Sustainable WA Winegrape Standard.

This process starts prior to the initial onsite audit in the program with the auditor's review of a vineyard operation's completed self-assessment. The process of reviewing the self-assessment helps the auditor understand the operation's perspective on their level of conformance with the Sustainable WA Winegrape Standard and may help identify areas for follow up and review.

Certifiers may work with auditors and program participants to develop a list of key documentation and records that will be reviewed during the audit; however, this approach is provided as an option, but ultimately the certifier has discretion to leverage preexisting approaches they have established as per their internal procedures and quality requirements.

Some examples of documentation and record types applicable to vineyard operations include:
- Human Resources Management
  - Employee handbook
  - Accident Prevention Program documentation
  - Meeting records such as sign-in sheets
  - Safety training documentation
- Environmental Management
  - Management and conservation plans for soil, water, etc.
  - Lab analysis reports
  - Fertilizer application records
- Pesticide Management
  - Management plans
  - Monitoring records and scouting reports
  - Sprayer/duster maintenance and calibration records

The above list is only an example of documentation and records that will be reviewed to verify conformance with the Sustainable WA Winegrape Standard. The scope of documentation and record review will be determined by the auditor during the audit.

Site Observations
Direct observation of vineyards and winery winegrape handling and storage areas are critical aspects of the third-party onsite audit process. Observations related to handling of Sustainable WA Certified Vineyard winegrapes are especially important in the context of chain of custody audits, which are carried out for wineries and related facilities.

In the case of stand-alone vineyard operation onsite audits, the auditor's observations should include a review of the entire vineyard. ***In the case of multiple vineyard blocks with significant acreage that are included in the scope the program participant's application***, a minimum of 75% of the vineyard blocks included in the application should be reviewed via onsite audit observations to confirm consistency of management practices across all blocks in the application. Targeted spot checks of the remaining 25% of the vineyard blocks can be carried out in these situations.

In the case of winery chain of custody audits, the auditor's approach to observations should include a review of the parts of the winery facility where receiving, handling and storage of certified winegrapes are done, along with areas where fermentation and post-fermentation storage activities are carried out. Winery observations should support crosschecking of documentation and records that clearly document processing of wines produced from certified winegrapes and identify their location in the facility.

Depending on the circumstances associated with offsite audits, observations of specific aspects of the vineyard operation may be done remotely using technology, as appropriate.

Worker Interviews
Worker interviews are carried out as part of onsite audits in order to evaluate conformance with different aspects of the Sustainable WA Winegrape Standard, including occupational health and safety, wages and benefits, pesticide handling, and other relevant requirements.

An outline of the general approach to be used for conducting worker interviews is provided:
- Auditor(s) review the information in the application and follows up to confirm workers will be present during the timeframe for the onsite audit (also confirming languages spoken by the workforce). Audit timing is calibrated as needed to ensure workers are available for interviews (as much as is feasible); audit plan indicates when interviews will be done.

- In advance of the audit, auditor confirms the exact number of workers to be interviewed ensuring a representative sample of 15% of the

---

Additional Context on Worker Interviews

Worker interviews are a routine part of third-party sustainability audits and strengthen the validity of audit findings.

Worker interview protocols dictate they should be done in a way that provides a level of confidentiality related to the specific information workers share during the process. Auditors may need to have proficiency or fluency in Spanish in order to carry out worker interviews with a representative group of workers in some operations.

In some cases, an auditor may require the support of a translator. In these situations, it is important for the certifier that manages the auditor to review the credentials of the translator and to confirm they are free from any conflicts of interest and have appropriate understanding of the subject matter and terminology related to the Sustainable WA Winegrape Standard.

total workforce (based on the current crop year), accounting for worker types (directly employed vs. contracted via a farm labor contractor, management company, etc.), job responsibilities, and gender.

- o For a smaller workforce (e.g., 10 or less workers), a minimum of three worker interviews will be conducted.
- o For a larger workforce (e.g., 60 or more workers) a maximum of nine worker interviews will be conducted.

Auditors will use their discretion to determine the best location for conducting worker interviews, and a reasonable effort made to ensure the overall operational needs are not adversely impacted by the worker interview process. With this in mind, time management techniques should be used to streamline the approach for each worker interview conducted.

For onsite chain of custody audits of wineries and related entities, the worker interview sample should be comprised of management and workers responsible for receiving and handling certified winegrapes (rather than the entire workforce) given the scope of the requirements.

Offsite Audits
As previously noted, the approach to offsite audits is to be adapted from the approach to onsite audits considering only a targeted set of activities to verify ongoing conformance to the Sustainable WA Winegrape Standard can be carried out remotely. For the purposes of ensuring program participants are prepared for the offsite audit and to support an efficient process, auditors are encouraged to coordinate with the participants to confirm they have completed self-assessments in advance of the offsite audit date and have compiled all necessary documentation and records.

3.5 Summary Audit Report
A summary audit report will be developed by third-party auditors and shared with program participants no later than 20 days following the completion of an audit. Audit reports will mainly focus on documenting any non-conformities with the Sustainable WA Winegrape Standard that need to be addressed (i.e., minimum requirements – see below) for certification to be granted. The audit report will also reference documentation/records and/or actions needed to achieve compliance with each area of non-conformity. Program participants should note that the audit report is the outcome of the third-party audit verifying the level of conformance with the Sustainable WA Winegrape Standard and this will provide their score relative to the standard.

3.6 Response to Non-Conformities
Program participants will have 30 days following receipt of the summary audit report to submit an initial response to any non-conformities with proposed corrective actions necessary to achieve compliance with the minimum certification requirements.

The certifier, working with the auditor, will review the program participant's initial response, along with the objective evidence documenting the corrective actions, to confirm non-conformities have been addressed. If further follow up is needed due to insufficient corrective actions with one or more non-conformities, an additional timeline

> **Sustainable WA Winegrape Standard**
> **Minimum Requirements**
>
> **Self-Assessment completed**
> **+**
> **18 mandatory requirements**
> **+**
> **70% for each chapter**
> **(Average category score of 2.8)**
> **+**
> **4 quantitative metrics reported on**

of 15 days will apply for the program participant to provide a satisfactory response to address closure of any pending non-conformity. **Certification cannot be granted if sufficient responses in the form of corrective actions are not provided according to the above deadlines.**

4.0 Certification Decision

Once the audit process has been completed and corrective actions confirmed for addressing any necessary non-conformities, the certifier will inform the Program Administrator that certification can be granted. All supporting documentation and records associated with the completed audit process will be provided to the Program Administrator as supporting evidence.

The decision to certify is based on the program participant's conformance with all program requirements, including verification of meeting the required scoring threshold per the Sustainable WA Winegrape Standard Minimum Requirements. Program participants will be notified by the Program Administrator that they have been certified and certificates will be provided.

Certification may not be granted in some circumstances, which include the following:
- Failure to meet the Sustainable WA Winegrape Standard Minimum Requirements;
- Failure to complete corrective actions to address non-conformities by the deadlines;
- If, during the time in between audits, the program participant is found to no longer be compliant with the Sustainable WA Winegrape Standard; and,
- If, at any time during the audit and certification process, the program participant submits incomplete, misleading or false information.

If a program participant is denied certification, the certifier and Program Administrator will coordinate to provide a written justification for the decision to not grant certification in order to give notice to the program participant.

4.1 Renewal Certification

Program participants will confirm if any changes to the scope of their certificates are needed as part of the renewal certification process each year. This includes completing a self-assessment annually and receiving either an onsite or offsite audit according to the third-party audit cycle in Section 2.3. Renewal certification is based solely on the program participant's successful completion of the entire certification process and maintaining conformance with the Sustainable WA Winegrape Standard on an ongoing basis. **The non-conformity closure process for renewal certification applies, as well as all associated established deadlines for corrective actions.**

4.2 Appeals

In cases where a program participant wishes to file an appeal related to the outcome of a third-party audit in relation to non-conformities identified during the audit, the written appeal should be submitted to the certifier within 15 days of receipt of audit report. If a program participant wishes to appeal a final certification decision, they must have already started the appeals process within the 30-day timeframe for non-conformity responses referred to in Section 3.6. The appeal should be sent to the certifier's certification manager via email with the Program Administrator included in copy using the contact information provided in Section 8.0. The program participant must provide:
- A copy of the communication with the certification decision that is being contested.

- A summary of the applicant's claim of conformance with the Sustainable WA Winegrape Standard that addresses each item in the decision letter.
- Supporting documentation that supports the claim of conformance with the Sustainable WA Winegrape Standard.

Once the appeal is received, the Program Administrator will engage the Governance Council to review the appeal and provide a response with a proposed resolution within 30 days.

5.0 Program Fees
The Sustainable WA program fees are as follows:

Onboarding application fee: $500

Acreage fee: $10/acre

Annual program fee (growers):
- First-time program participants (growers):
  - Less than 50 acres: $750
  - 50-200 acres: $1,500
  - 201-1,000 acres: $2,250
  - More than 1,000 acres: $3,000
- Returning/renewing program participants (growers):
  - Less than 50 acres: $500
  - 50-200 acres: $1,000
  - 201-1,000 acres: $1,500
  - More than 1,000 acres: $2,000

6.0 Third-Party Certifier and Auditor Qualification
Qualifications of third-party certifiers and auditors are vetted by the program administrator before approval to conduct audits in the Sustainable WA program is granted. At minimum, certifiers must have a valid ISO 17065 accreditation for GlobalGAP certification scope(s) to be eligible for training and approval in the Sustainable WA program, as this accreditation indicates a quality management and internal review system is implemented by the certifier based on an independent review carried out by an accreditor.

All certifier staff and auditors are approved for work in the Sustainable WA program based on the following:

- University or college degree (or equivalent experience) in agriculture, environmental science, or related field.

- Over 5 years of experience conducting third-party audits against food and agriculture standards or comparable experience that demonstrates subject matter competency.

- Working Knowledge of winegrape and vineyard management production practices.

- Experience with chain of custody auditing.

- Business proficiency in Spanish (at least one team member from the audit team) and/or experience conducting audits with the support of a Spanish language interpreter.

- Satisfactory participation and completion of an introductory Sustainable WA Certified Vineyard Program training.

- Consistent involvement in all ongoing training and review activities identified by the program administrator.

7.0 Brand and Logo Use Guidelines

To review all brand and logo use guidelines, please access information **here**.

8.0 Contact Information

For more information and inquiries regarding the Sustainable WA Program please contact:

Washington Winegrowers
Email: marissa@wawinegrowers.org
Phone: Office: 509.782.8234
Address: 203 Mission Avenue, Suite 107
      PO Box 716
      Cashmere, WA 98815

9.0 Terms and Definitions

Some terms are excerpted from the ISEAL Code of Good Practice, Assuring Compliance with Social and Environmental Standards, V2.0 (January 2018), ISEAL's Chain of Custody Models and Guidance (2016) and ISEAL's Sustainability Claims Good Practice Guide (2015).

Certification: The issuance of a third-party statement that fulfillment of specified conformance requirements has been demonstrated.

Chain of Custody: The custodial sequence that occurs as ownership or control of the material supply is transferred from one custodian to another in the supply chain (Adapted from: WB, WWF Alliance for Forest Conservation and Sustainable Use, 2002).

Claim: A message used to set apart and promote a product, process, business or service with reference to one or more of the pillars of sustainability: social, economic and/or environmental.

Corrective Action: An action taken to eliminate the cause of a non-conformity identified by an auditor to prevent reoccurrence.

Non-Conformity: Any failure to meet a requirement.

Third-Party Audit: An evaluation that is conducted against a set of objective requirements or requirements carried out by an entity independent from the entity or operation being evaluated. A systematic, documented process for obtaining records, statements of fact or other relevant information and assessing them objectively to determine the extent to which specified requirements are fulfilled.

Third-Party Auditor: Person who performs the third-party audit.

Traceability: The completeness of the information about every step in a process chain which allows for verification of origin of the material.