



# QUALITY MANUAL

2018-2019

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# QUALITY MANUAL

## INTRODUCTION

Sun+Earth Certified is a not-for-profit organization created to promote earth-friendly cannabis production that prioritizes Earth Care, Human Empowerment, and Community Engagement.

The primary work of Sun+Earth Certified is to promote responsible cannabis farming through the Sun+Earth Certified certification program and through education about regenerative, organic farming practices.

Sun+Earth Certified owns and curates the Sun+Earth Standards, which were created under the guidance of two 3<sup>rd</sup> party certification bodies, The Cannabis Conservancy and Certified Kind, with critical input and feedback from a Technical Advisory Committee (TAC) comprised of visionaries, regenerative farmers, industry leaders and technical experts. The TAC helped to ensure the Sun+Earth Certified Standards are rigorous and meaningful as well as achievable and realistic for cultivators whose agricultural practices regenerate the earth and our communities.

The initial funding for the Sun+Earth Certified project came through a grant from Dr. Bronner's Magic Soaps because the project aligned with their Cosmic Principles to "Treat the Earth Like Home" by supporting regenerative organic farming projects that build soil and reverse climate change, and to "Fund & Fight For What's Right" by supporting hemp and drug policy reform.

In order to test and hone the Sun+Earth Certified Draft Standards, a pilot program with 13 northern California farms in Mendocino, Humboldt, and Sonoma counties were visited two times during the 2018 growing season. The funding for the pilot program work was split between Dr. Bronner's and Flow Kana, a leading California distributor of sun grown, sustainably cultivated cannabis.

Sun+Earth Certified is governed by a volunteer Board of Directors. More information can be found at [www.SunAndEarth.org](http://www.SunAndEarth.org).

## OVERVIEW OF SUN+EARTH CERTIFIED

The Sun+Earth Standard has been developed as a tool to lead the legal cannabis sector towards production methods that reduce the negative impacts on the ecosystem, workers, and communities. The Sun+Earth Standards are rigorous and go beyond current organic certification standards in their intention and impact. The three pillars of the Sun+Earth Certified standards are Earth Care, Human Empowerment, and Community Engagement.

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### EARTH CARE

The Sun+Earth Standards represent an evolution beyond organic by embracing the concept of regeneration. This means growing cannabis under the sun in living soil and conceptualizing the farm as an integral component of a larger ecosystem. It means building soil quality through mulching, crop rotation, and reduced tillage and identifying areas on the farm that require restoration and revitalization. A cannabis farm able to meet the Sun+Earth Standards might use plant mulch to reduce weed pressure, conserve soil moisture, enhance habitat for beneficial soil flora and fauna, and increase organic matter while also interplanting potatoes, lettuce, and marigolds alongside cannabis. The farmer would boost soil fertility on the farm through the strategic use of cover crops, compost, compost teas, and homemade plant ferments derived from on-farm and local resources. This

certification is not intended for industrial farming that relies on purchased off-farm inputs, bottled liquid fertilizers, pesticides, plastic, and monoculture plantings. It is also not a certification for indoor cultivation.

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#### HUMAN EMPOWERMENT

In addition to regenerative farming practices, the Sun+Earth Standards also attempt to address the rights of farm workers, who as a social group within agriculture have long been exploited and marginalized. Current organic standards don't deal with worker rights, but if a farmer wants to describe their farm as regenerative, shouldn't farm workers also be treated fairly? Regenerative farming is intended to renew the ecosystem and people—this means caring for farm workers. The Worker Rights section of the Sun+Earth Standards require written contracts between farms and farm workers, ensure the right to collective bargaining, and that workers aren't harassed but are treated respectfully with fair compensation.

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#### COMMUNITY ENGAGEMENT

The Sun+Earth Standards include language that requires the farm to engage their local community with greater focus and intention. This community piece is far outside the realm of existing organic certifications and represents fertile ground worthy of exploration. Building soil is widely considered a vital activity of an organic farm, yet a truly regenerative farm also realizes building community is just as essential. The Sun+Earth Standards require farms to maintain a written policy on how they contribute to the communities near their farms and require knowledge sharing about their regenerative farming techniques.

### THE CERTIFICATION PROGRAM

The Sun+Earth Certified program is implemented through third-party certification bodies that focus and specialize in the inspection and certification of sustainably grown cannabis. Sun+Earth Certified partners with Certified Kind and The Cannabis Conservancy to offer Sun+Earth Certified certification to growers, processors, and manufacturers of state-sanctioned legalized medical and adult-use cannabis operations anywhere in the world.

These partner certification bodies have established systems for 3<sup>rd</sup> party certification of cannabis operations and for ensuring confidentiality and impartiality within their certification processes. They also maintain a network of professional inspector/auditors trained to conduct inspections to the Sun+Earth Certified standards. Sun+Earth Certified has partnered with Certified Kind and The Cannabis Conservancy based on their experience conducting 3<sup>rd</sup> party certification of cannabis farms, their involvement with the development of the Sun+Earth Standards and their commitment to offering high-quality inspection and certification services with adherence to professional requirements outlined in ISO/IEC 17065: 2012 "Conformity assessment – Requirements for bodies certifying products, processes, and services."

#### APPROVAL OF CERTIFICATION BODIES

The certification bodies approved to implement the Sun+Earth Certified must provide the following information to be fully evaluated and vetted:

1. Company legal name, address, and legal representative.
2. Organizational chart showing roles and responsibilities.
3. A copy of the certification body's Quality Assurance manuals demonstrating general adherence to ISO/IEC 17065: 2012 guidelines.
4. Declaration that the certification body agrees to follow all Sun+Earth Certified procedures, requirements, and agreements as outline in this Quality Manual, see certifier agreement Annex 1.

5. A summary of the relevant professional qualifications and experience including resume or curriculum vitae for all personnel involved in implementation of the Sun+Earth Certified Standards.
6. Any other information required by the Sun+Earth Board of Directors.

Sun+Earth Certified Board of Directors will evaluate the approval of new certification bodies using the certifier evaluation checklist guide. Currently, Sun+Earth Certified is not accepting applications for new certification bodies.

#### CERTIFICATIONS OFFERED - SCOPE

Sun+Earth Certified is offered to farms growing cannabis, vegetables, fruits, and herbs as well as processors and manufacturers of cannabis products according to the applicable sections of the Sun+Earth Certified Standards.

#### THE CERTIFICATION PROCESS

Farms, processors, distributors, and manufactures wishing to join Sun+Earth Certified must fill out an application and develop a Sun+Earth Certified System Plan that describes in detail the processes and procedures of the operation which will be evaluated to determine if the operation is eligible for certification. The application is available on the Sun+Earth Certified website ([www.sunandearth.org](http://www.sunandearth.org)) or on the Certified Kind website ([www.certified-kind.com](http://www.certified-kind.com)) or The Cannabis Conservancy website ([www.cannabisconservancy.com](http://www.cannabisconservancy.com)). Certification includes several evaluation steps plus an onsite inspection and must be renewed on an annual basis.

**Getting Started**—First, an applicant must fill out the Sun+Earth Certified Application (controlled document) and submit the completed form to one of the approved certification bodies. An applicant can chose to work with Certified Kind ([www.certified-kind.com](http://www.certified-kind.com)) or The Cannabis Conservancy ([www.cannabisconservancy.com](http://www.cannabisconservancy.com)) for all phases of the certification process. In some cases, the certification body may be assigned to work with an operation due to geographical proximity or to reduce travel costs to the operation. Once the certification body has received the Sun+Earth Certified Application, the confidential Initial Review of the application will be conducted. Observations and findings of the initial review will be communicated to the applicant. If there are farming practices that don't meet the core requirements of the Sun+Earth Certified standards, and additional information or clarification is insufficient towards ensuring compliance to the core requirements, then the application request will be denied. If during the initial review, the applicant is found to be eligible for certification because the production practices described meet the Sun+Earth Certified core requirements, then the certification body will proceed to schedule and conduct an onsite inspection.

**Onsite Inspection**—Once the Initial Review is complete and the production practices detailed in the application/System Plan have been determined to meet the minimum Sun+Earth Certified core requirements, an auditor will be sent out to the operation to conduct an onsite inspection. The inspection is essential for confirming that the details in the application/System Plan are accurate and that all production practices meet the core requirements. A knowledgeable representative of the operation must be present for the onsite inspection and the inspector must have access to all areas and applicable records of the operation. The inspection should occur at a time when the land and/or facilities are functional and able to demonstrate compliance to the Sun+Earth Certified standards. For farms, this usually means when plants are growing. For processors and manufacturers, the inspection should coincide with production runs or close to production runs. Each operation must be inspected every year to ensure continued respect and adherence to the Sun+Earth Certified standards. Failure to agree to or schedule an onsite inspection could result in a suspension or denial of the certification.

For farmers, the inspection is an excellent time to show-off all the hard-work being done on the farm to restore, revitalize and regenerate the land and the ecosystems on the farm. Although rules regarding professional 3<sup>rd</sup> party certification prevent the inspector from offering consulting advice during the inspection, Sun+Earth Certified inspectors are encouraged and expected to understand and discuss various regenerative farming techniques and

share informational resources about regenerative, organic agriculture. However, inspectors are bound by contractual agreements to maintain strict confidentiality about the proprietary practices and techniques associated with their inspection work. All Sun+Earth Certified inspectors must sign an Inspector Agreement (controlled document) that has requirements that information collected at inspection remains confidential and can only be used to implement Sun+Earth Certified certification. Inspectors also must declare all existing and potential Conflicts of Interest (controlled document) on an annual basis to ensure they aren't assigned inspections of operations that they work for, own, or receive income from.

**Inspection Assurances**—The Certification Bodies will ensure that a trained and qualified inspector is assigned the onsite inspection.

- The inspector will review an applicant's or renewing operation's certification paperwork and fully prepare for the inspection in advance of the inspection date.
- The inspector will contact the operation to set a date and time of the inspection and to share any clarifying information or questions.
- The inspector will travel to the operation location and conduct a professional inspection to verify adherence to the Sun+Earth Certified standards and that the application/System Plan details are accurate, current, and updated.
- The inspector will conduct an exit interview at the end of the inspection to share relevant findings and observations.
- The inspector will complete the Sun+Earth Certified inspection report and submit it to the Certification Body for final review within 14 days from the date of the inspection.

**Final review**—The certification body working with the operation is responsible for the final review of the inspection report and certification decision. The inspector represents the eyes and ears of the Certification Body and doesn't make the final decision on the certification. Instead, a certification specialist with expert knowledge of the Sun+Earth Certified standards will review the inspection report along with the application/System Plan to conduct a final review and recommend a Certification Decision. The final review will be completed usually within 21 days after the inspection report is received. The recommended Certification Decision will be presented to the Board of Directors of Sun+Earth Certified for final approval of the certification. The Certification Decision results will be communicated in writing in a timely manner to the operation requesting the certification. The Certification Decision can have four basic outcomes, Approve, Approve with Reminders, Approve After Resolution of Noncompliance, or Suspend/Deny.

If a farm or processor/manufacturer is found to be compliant to all core requirements, then a decision of Approve is made and certification is granted.

In cases where the certification specialist would like to highlight minor areas of concern where improvement or special consideration is needed, the decision of Approve with Reminders is issued. A letter is sent to the operation that includes the reminders and certification is granted.

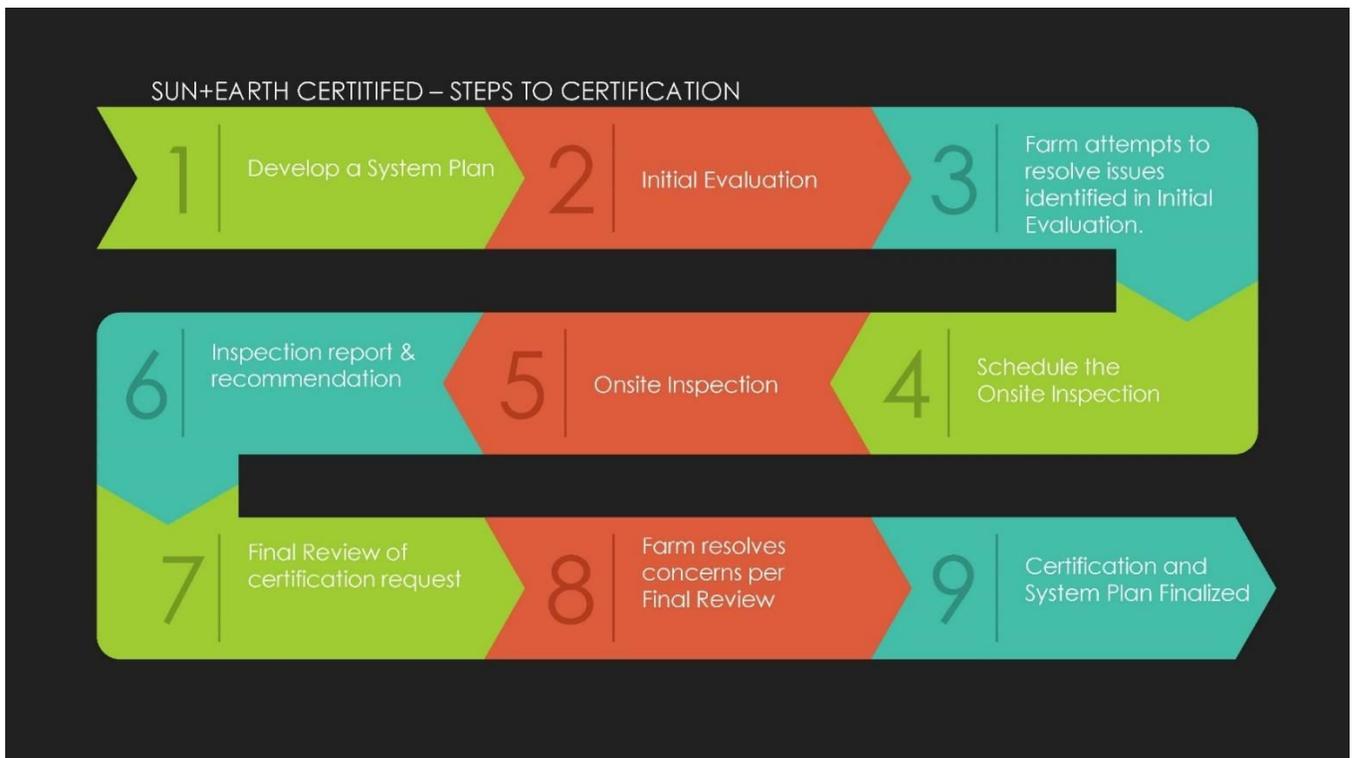
In situations where the certification specialist identifies a minor noncompliance that is correctable, the certification specialist will return a decision of Approve After Resolution of Noncompliance and will communicate the issue(s) that needs to be resolved and indicate a deadline to submit clarification and/or modification to operating procedures. After all noncompliance points are resolved, the certification will be granted.

In cases where a major noncompliance is found during inspection, issues that can't be easily corrected, like use of a prohibited pesticide or fertilizer or repeated failure to comply with a core requirement, the certification specialist

will issue a denial letter for applicants and a suspension letter for renewing clients. Both denial and suspension mean certification is not granted and the operation may not use the Sun+Earth Certified Logo or name to represent their product or production methods. Denial and suspension decisions can be appealed to the Sun+Earth Board of Directors or applicable subcommittee as noted below in the subsection entitled Complaints and Appeals. Operations that have been denied or suspended can re-apply for certification once all noncompliance issues have been resolved with the certification body.

**Certificate** – As part of the certification, a certificate will be sent that includes basic information about the operation certified including the operation name, address, certificate issue date, and expiration date. The certificate can be used as a marketing tool by the certified operation to communicate that they have met all the core requirements of Sun+Earth Certified. Certified operations must read and sign a Logo Use Agreement that describes how the Sun+Earth Logo can be used and under which circumstances logo use is restricted or not allowed. In all cases, the certificate and logo use and promotion of an operation as Sun+Earth Certified is permitted only to operations with a current, valid Sun+Earth Certified certification.

The graphic below illustrates the steps involved in certification.



#### COMPLAINTS AND APPEALS

Complaints about the integrity of the Sun+Earth Certified certification program or integrity of certified products will be tracked, and action undertaken to resolve them. Similarly, if an applicant or certified operation is denied certification or has their existing certification suspended by the certification body, the affected party may appeal the certification decision. Complaints and appeals must first be sent to the certification body responsible for the contested decision. Complaints and appeals of certification decisions and actions taken to review and resolve them will be based on information obtained through the certification process or made available by the applicant/certified entity, and other sources as applicable. Complaints and appeals must be received in writing with a full description of the situation and relevant information, evidence, or documentation to help explain the

situation. If a settlement or resolution between the certification body and the applicant/certified entity who filed the complaint or appeal cannot be reached, then the certification body will notify the Sun+Earth Certified Board of Directors. The Sun+Earth Certified Board of Directors or subcommittee of the Board of Directors will determine if the complaint or appeal relates to Sun+Earth Certified certification activities for which it is responsible. The Board of Directors will acknowledge receipt of the appeal or complaint and gather enough information necessary to attempt to resolve and/or mediate the appeal or complaint in an efficient manner that is free from conflicts of interest.

To ensure there is no conflict of interest, personnel who have provided consultancy or been previously employed by the complainant or appellant or entity named in a complaint within two years shall not participate in the review or approval of that complaint. The Sun+Earth Certified Board of Directors or subcommittee will meet to discuss and evaluate the complaint or appeal to fully understand the situation and find a resolution and direct the certification body, if applicable, of any subsequent action needed to resolve the complaint or appeal. Formal notice of the outcome and end of the complaint or appeal process will be given to the complainant or appellant.

#### MANAGEMENT OF IMPARTIALITY AND CONFLICTS OF INTEREST

It is necessary for certification bodies and their personnel to be impartial, and to be perceived as impartial, in order to give confidence in their activities and their outcomes.

The certification bodies working on behalf of Sun+Earth Certified shall ensure that certification activities are conducted impartially. This means the certification body shall be responsible for the impartiality of its certification activities and shall not allow commercial, financial or other pressures to compromise impartiality. The certification body must remain free from conflicts of interest and must implement the certification objectively, fairly, and with an open mind.

Risks to impartiality can arise from the certification agency's relationships or relationships of its personnel but these relationships may not necessarily present a certification body with a risk to impartiality.

Risks to impartiality include bias that may arise from the following:

- a) self-interest (e.g. overdependence on a contract for service or the fees, or fear of losing the client or fear of becoming unemployed, to an extent that adversely affects impartiality in carrying out conformity assessment activities);
- b) self-review (e.g. performing a conformity assessment activity in which the certification body evaluates the results of other services it has already provided, such as consultancy);
- c) advocacy (e.g. a certification body or its personnel acting in support of, or in opposition to, a given company which is at the same time its client);
- d) over-familiarity, i.e. risks that arise from a certification body or its personnel being overly familiar or too trusting, instead of seeking evidence of conformity (in the product certification context, this risk is more difficult to manage because the need for personnel with very specific expertise often limits the availability of qualified personnel);
- e) intimidation (e.g. the certification body or its personnel can be deterred from acting impartiality by risks from, or fear of, a client or other interested party);
- f) competition (e.g. between the client and a contracted person).

The certification bodies have mechanisms in place to safeguard against conflict of interests. Potential conflicts of interest are monitored and avoided. Anyone that reviews an application for certification performs onsite inspections, makes certification decisions, or is responsible for any certification step must use Sun+Earth Certified certification forms and verify they have no conflict of interest. If there is a conflict of interest they must recuse themselves from certification work that could risk or could foster the perception of risking impartial, fair, objective decision making. For example, inspectors with familial connections or a commercial interest in an operation seeking Sun+Earth Certified certification may not participate in any process or step of the certification.

Complaints regarding the impartiality of the certification bodies implementing the Sun+Earth Certified program can be filed in writing with the Sun+Earth Board of Directors or applicable subcommittee as noted in the subsection entitled, Complaints and Appeals.

#### CONFIDENTIALITY

All information maintained or collected for certification purposes will remain strictly confidential between the farm/facility requesting certification and the certification body responsible for implementing the certification steps. Records shall be transported, transmitted and transferred in a way that ensures confidentiality is preserved. The certified farm/facility shall have access to information and records pertaining to their own certification upon request.

Absolutely no proprietary information is disclosed to third parties without the certified entity's written consent.

During complaint and appeal investigations, Sun+Earth Board of Directors or applicable subcommittee may also have access to certification information and records relating to the scope of the appeal or complaint, with the written consent of the complainant or applicant, as applicable.

Public information about the certified operations may be made available on the Sun+Earth Certified website and websites of the partner certification bodies. The type of information made available to the public about a certified entity may include the following:

- Business Name
- Names of Responsible Parties
- Mailing Address
- Contact Information (phone number, email, website, social media)
- Certification Date
- Farm and/or Facility Location
- Status of Certification
- Photos (with consent of operation)

#### FEES

The Sun+Earth Certified program is a professional certification program that requires expert knowledge in certification systems to implement correctly. Sun+Earth Certified is a not-for-profit that depends on select third party certification agencies to conduct the essential certification steps of Initial Review of an application, Onsite Inspection, Final Review, Correspondence, Final Decision, Data Management, Material Review, and Annual Renewal of Certifications.

Every effort will be made to keep costs for certification affordable for participating farms. Sun+Earth Certified plans to create a *Free the Fee Fund* to help offset the cost of certification.

To make the certification affordable for farmers, Sun+Earth Certified has set the ceiling price for certification bodies of \$2200 for inspection and certification (excluding travel costs). Inspector travel expenses (transportation, lodging, food) may be invoiced separately and depend on several factors including inspector availability and proximity to the farm/facility requesting certification. Every effort will be made to reduce travel expenses and combine multiple farms on the same inspection trip. An applicant or renewing operation may withdraw their request for certification at any time but is liable for the costs of services provided up to the time of the withdrawal.

Fees shall be invoiced to the applicant by the certification body responsible for their certification according to the fee policies set in place by the certification body.

#### LOGO USE AND NAME

Sun+Earth Certified operations must agree to and sign the Sun+Earth Logo Use Agreement and comply with all Sun+Earth Certified Standards. The Sun+Earth Certified logo can be used for promotion and marketing and in any color or size but must not be altered in any other way. Only Sun+Earth Certified operations may use the logo on product packaging and for marketing purposes. Logo use by non-certified entities to market products or promote their business is generally not allowed and is considered an infringement of Sun+Earth Certified trademark rights.

The Logo:



Additional Logo with the three certification pillars:



#### LOGO USE MONITORING

Sun+Earth Certified partnering certification bodies will periodically survey retail venues to check that use of the Sun+Earth Certified Logo is being done in accordance with the Sun+Earth Logo Use Agreements and with

conformity to the Sun+Earth Certified Standards. Any misuses of the logo will be reported to the Sun+Earth Board of Directors along with applicable and necessary notices to involved parties.

## Annex 1 – Certifier Agreement

Certification bodies that partner with Sun+Earth Certified agree to:

- Carry out their duties in an impartial, objective, and conflict of interest free manner while protecting the confidentiality of client information at all times.
- Use Sun+Earth Certified Intake Forms and Sun+Earth Certified Inspection Report Forms.
- Follow applicable guidelines and principles as discussed in ISO/IEC 17065: 2012 “Conformity assessment – Requirements for bodies certifying products, processes, and services.”
- Use Sun+Earth Certified letterhead for official correspondence with certified entities.
- Store and manage certified entity information on password protected data management systems.
- Share information with other Sun+Earth Certified partner certification bodies with the goal of providing the highest quality certification service for all parties.
- Only charge fees to new applicants or renewing farms as established in the Sun+Earth Certified Quality Manual.
- Ensure only updated internal and external documents are being used to implement the certification per policies regarding Controlled Documents.