



HORTICERT

Suggested Template for Internal Risk Assessment

The internal risk assessment must find and evaluate any potential and actual risk that could cause non-compliance with HORTICERT **Sustainability, Traceability and Chain of Custody (CoC) Requirements**.

To identify risks, HORTICERT recommends using the template below. You must answer all questions in the table to complete the risk assessment. Additional questions related to the specific operation can also be added.

To conduct the internal risk assessment, it is recommended to follow these steps:

1. Read each question and give a first answer with “yes” or “no.”
2. Use the matrix table to decide whether the risk is high or regular.

- Probability of occurrence refers to **how likely it is to happen**
→ Ask: *Is this risk something that could likely, occasional or unlikely happen?*
- Consequences refers to **how bad it is if it happens**
→ Ask: *If this happens, will the impact be critical, moderate or negligible?*

Consequences	Probability of Occurrence		
	Likely	Occasional	Unlikely
Critical	High	High	High
Moderate	High	High	Regular
Negligible	Regular	Regular	Regular

3. Write a short explanation for your answer in the “justification” section.
4. List the control measures that help reduce or manage the risk.



Internal Risk Assessment

Name of Company:	
Date:	
Assessor:	

Nr	Potential Risk	Assessment <i>Yes or No</i>	Risk <i>High or Regular</i>	Justification	Risk control measures
<i>Sustainability Requirements</i>					
1	Is the System User in a region ¹ where environmental and social laws are potentially less strict than the HORTICERT Sustainability Requirements, or where these laws are not well enforced by authorities?				
2	Is the System User located in a region ¹ where land-use-change on primary forests or other areas with High Carbon Stock, biodiversity or protected areas potentially took place after the 1 st of January 2015?				
3	Is the System User located in a region ¹ close to any water bodies, protected areas (so called “No-Go areas”) and might they be affected by the System User’s operations?				

¹ For Group Managers: And/or supplies from regions



Nr	Potential Risk	Assessment <i>Yes or No</i>	Risk <i>High or Regular</i>	Justification	Risk control measures
4	Is the System User's operation causing air pollutants (e.g. dust), hazardous waste, or wastewater?				
5	Does the System User operate in a region ¹ where municipal infrastructure (e.g., waste and wastewater system), which would facilitate compliance with the ecological Sustainability Requirements of HORTICERT, is not sufficiently available?				
6	Are pesticides or inorganic fertilizers used in cultivation that might not align with the WHO publication 'Recommended Classification of Pesticides by Hazard and Guidelines to Classification' (2019) (tables 1 and 2), the Rotterdam Convention and the Stockholm Convention (also considering pesticides that might have already been purchased in the past)?				
8	Are there any other potential human or labor rights risk (e.g., bad working conditions, freedom of association and the right to collective bargaining, potential child labor, forced labor, discrimination, harassment and abuse)?				
9	Are there any potentially vulnerable groups (e.g. migrant workers, minorities, etc.) at risk of discrimination and/or harassment?				
10	Are there major health and safety hazards in the workplace? What are the main health and safety risks?				
11	Does the System User provide permanent workers an employment contract that includes the terms and conditions and is				



Nr	Potential Risk	Assessment <i>Yes or No</i>	Risk <i>High or Regular</i>	Justification	Risk control measures
	written in a language that the worker understands?				
12	Is the System User located in a region ¹ where communities live close by or where indigenous people live, and are land use rights, former land acquisition and potential impacts on surrounding local communities known and respected? What are the potential effects of the System User's operation on the surrounding communities (especially indigenous people and vulnerable groups)?				
13	Is the System User familiar with all applicable local, national and international laws and regulations?				
14	In case subcontractors are employed, can the System User ensure that they meet all applicable HORTICERT requirements?				
15	In the case of Group Certification, is the Group Manager aware of their responsibilities towards Group Members, subcontractors, and suppliers (e.g., providing the required documents and lists of agrochemicals, providing training, and implementing requirements, laws and regulations)? Can the Group Manager ensure that Group Members understand and implement the HORTICERT requirements?				



Nr	Potential Risk	Assessment <i>Yes or No</i>	Risk <i>High or Regular</i>	Justification	Risk control measures
<i>Traceability and Chain of Custody Requirements</i>					
17	Is there an adequate quality management system in place already?				
18	Have employees being assigned with the responsibility to ensure compliance with the HORTICERT requirements? Have they been appropriately trained with regard to HORTICERT?				
19	Is the reporting/ERP system well-maintained, in line with e.g., reports of incoming and outgoing material, field records, delivery notes, invoices, and weighbridge tickets and contracts, and are these documents available?				
20	Are the different processing steps of the operation sufficiently documented?				
21	Are there conversion factors in internal processes? Are several products processed with different conversion factors?				
22	Is HORTI-TRACE well-maintained including volume accounting, reporting, documentation, and data maintenance? ²				
23	Are the entries in HORTI-TRACE correct, especially if the System User is a First Traceability Checkpoint?				
24	How accurate and complete are records and documents?				
25	How often are records and documents updated and how easily accessible are they?				

² Not relevant for initial Audit.



Nr	Potential Risk	Assessment <i>Yes or No</i>	Risk <i>High or Regular</i>	Justification	Risk control measures
26	Is the proportion of raw materials of unknown origin known?				
27	How many subcontractors and external service providers are involved? How high is the dependence on their know-how? How many work processes are carried out by subcontractors compared to permanent internal employees?				
<i>Additional questions – use the rows below to add any extra questions that are relevant to your specific situation and operations</i>					