

SEI CML

CORE MODULE LAYER – LEGAL COMPLIANCE & POLICY

Module Introduction

1. Purpose and Application

CML – Legal Compliance & Policy establishes the mandatory legal, governance and organisational foundation for certification. CML applies to every organisation and to all activities included within the certification scope. Its purpose is to establish that the organisation is legally constituted, authorised to undertake its activities, aware of the legal and other applicable requirements governing those activities, and capable of maintaining effective responsibility and oversight. The requirements of CML apply across the organisation's applicable Activity Modules and provide the foundation for assessing activity-specific conformity.

2. European Regulatory Basis and International Application

SEI is a European voluntary certification scheme, and the requirements of this Module have been developed primarily within the regulatory and conformity-assessment context of the European Union. Organisations shall nevertheless identify and comply with all mandatory international, national, regional and local requirements applicable in the jurisdiction in which certified activities are undertaken. Where an applicable legal or regulatory requirement establishes a higher or more specific obligation than an SEI requirement, the applicable mandatory requirement shall prevail. Where SEI establishes an additional voluntary requirement that does not conflict with applicable law, conformity with the applicable SEI requirement remains necessary for certification.

3. CML Hierarchy and Assessment Logic

The CML criteria follow a deliberate sequence. An organisation shall first establish its legal existence and authority to operate before demonstrating how applicable requirements, responsibilities, policies, risks, controls, competence, performance and communication are managed.

The assessment hierarchy is:

LEGAL ESTABLISHMENT → AUTHORITY TO OPERATE → APPLICABLE REQUIREMENTS → GOVERNANCE & RESPONSIBILITY → POLICY & COMMITMENT → RISK & CONTROL → COMPETENCE & IMPLEMENTATION → MONITORING & EVIDENCE → CORRECTIVE ACTION & REVIEW → COMMUNICATION

This hierarchy reflects a fundamental principle of the Core Module: an organisation cannot demonstrate responsible performance where the underlying activity is not legally authorised or where fundamental legal or governance requirements are not satisfied.

4. Operational Responsibility, Shared Duties and Third Parties

Ownership, contractual responsibility and operational control shall be distinguished. Responsibility shall follow the activity, condition or function that the organisation controls or has formally accepted, rather than ownership alone. Where horses, facilities, land, routes, services, personnel, contractors, external professionals or other resources are provided or controlled by third parties within the certification scope, the respective responsibilities of the organisation and the relevant owner, keeper, rider, trainer, professional, venue operator, landowner, contractor, service provider or other responsible party shall be clearly established.

Allocation or delegation of responsibility to a third party shall not relieve the organisation of responsibility for conditions, activities, decisions and conduct within areas or functions under its operational control. Interfaces between parties shall be sufficiently defined to prevent gaps, conflicting instructions or assumptions about who is responsible. The organisation shall maintain appropriate authority to establish and enforce requirements necessary to protect horse wellbeing, participant and public safety, safeguarding, biosecurity, environmental protection, and responsible conduct within the certification scope, including the authority to modify, restrict, suspend, or stop an activity where a significant unresolved risk exists. Where objective evidence indicates serious mistreatment, neglect, illness, injury, pain, distress or another significant horse-wellbeing concern, the organisation shall take reasonable and proportionate action within its authority. Serious avoidable harm shall not knowingly be permitted to continue solely because the horse is owned or managed by another person. Where



responsibility is shared, temporary, outsourced or transferred, responsibilities, handovers, escalation routes and emergency arrangements shall be sufficiently defined to prevent gaps in horse care, welfare oversight, participant or beneficiary protection, safety, biosecurity, environmental control, information management or emergency response.

5. Application of CML

CML shall be assessed in conjunction with the applicable Activity Module or Modules. Activity-specific requirements provide the operational detail necessary to demonstrate how the governance principles established through CML are applied in practice. Where a CML requirement and an Activity Module requirement address the same subject, evidence may be assessed together where it adequately demonstrates conformity across the relevant certification scope.

Criterion CML-1 – Legal Establishment and Authorised Operation

The organisation shall be legally established and authorised to conduct all activities included within the certification scope.

Compliance Requirements

CML-1.1 The organisation shall hold current legal registration or equivalent recognised legal status in each country in which certified activities are conducted.

CML-1.2 The organisation's registered, licensed or formally declared activities shall be compatible with the activities included within the certification scope.

CML-1.3 The organisation shall hold all licences, permits, registrations, approvals or authorisations required by competent authorities for the activities conducted, including activity-, establishment-, location-, route-, event- or service-specific authorisations where applicable.

CML-1.4 The organisation shall exercise effective operational control over the activities included within the certification scope, or the legal or contractual relationship establishing such control shall be documented.

CML-1.5 Material changes affecting legal identity, ownership, operational control, licensing status or certified activities shall be communicated to the Certification Body within the period established by the certification rules.

Indicators

- Valid legal registration or equivalent official documentation is available.
- Registered or authorised activities correspond with activities actually delivered.
- Applicable licences, permits and approvals are current and traceable.
- Operational control and relevant contractual relationships are clearly established.
- No material discrepancy exists between the organisation applying for certification and the entity delivering the certified activities.

Verification and Non-Conformity Conditions

Verification includes examining legal registration documents, operating licences, permits, competent-authority approvals, ownership or contractual arrangements, and comparing them with the certification scope.

Minor non-conformity: Arises where legal establishment and operating authority are valid, but individual administrative records, documents or notifications are incomplete or outdated without affecting lawful operation.

Major non-conformity: Arises where the organisation cannot demonstrate legal establishment, undertakes an activity without mandatory authorisation, materially misrepresents its legal identity or operational control, or continues an activity after the competent authority has suspended or withdrawn the required authority.

Criterion CML-2 – Identification and Control of Applicable Legal Requirements

The organisation shall identify, maintain access to and control all legal and regulatory requirements applicable to the activities included within the certification scope.

Compliance Requirements

CML-2.1 Applicable European Union, international, national, regional and local legal and regulatory requirements relevant to the activities and jurisdictions included within the certification scope shall be identified, maintained current and accessible.

CML-2.2 Applicable requirements relating to horses, animal health and welfare, identification and traceability, transport, veterinary medicines, biosecurity, environment, employment, occupational health and safety, safeguarding, accessibility, healthcare or professional services, data protection, consumer protection, tourism and commercial activities, land or route access and other material operational matters shall be identified where relevant to the certification scope.

CML-2.3 Applicable legal obligations shall be translated into responsibilities, operational controls, inspections, records or other appropriate means of demonstrating compliance.

CML-2.4 Legal compliance shall be periodically evaluated, and identified deficiencies shall result in appropriate corrective action.

CML-2.5 Changes in applicable legislation shall be identified, and affected controls or activities shall be reviewed and modified where necessary.

Indicators

- A current legal register, legal matrix or equivalent source is maintained.
- Legal obligations applicable to the certification scope are identifiable.
- Responsibility for material obligations is assigned.
- Periodic Legal-compliance evaluation is demonstrable.
- Legislative changes can be traced to review and operational action.

Verification and Non-Conformity Conditions

Verification includes review of the legal register, licences, permits, statutory inspections, official correspondence, compliance evaluations and sampling against actual practice.

Minor non-conformity: Arises where requirements are substantially identified and controlled but individual references, responsibilities, review dates or evidence are incomplete.

Major non-conformity: Arises where significant applicable legislation has not been identified, legal obligations are systematically unmanaged, or objective evidence demonstrates material or repeated unlawful operation.

Criterion CML-3 – Applicable Equestrian, Professional and Governing Requirements

The organisation shall identify and comply with mandatory equestrian, professional and other governing requirements applicable to activities included within the certification scope.

Compliance Requirements

CML-3.1 The organisation shall identify the international, national, regional or discipline-specific equestrian governing bodies, federations, professional bodies, examination or qualification bodies and other competent organisations whose mandatory requirements apply to the certified activities.

CML-3.2 Mandatory or binding governing or professional requirements affecting horse wellbeing, veterinary control, medication, professional competence, safeguarding, participation, eligibility, safety, integrity, competition, examination, transport, service delivery or other regulated activity shall be identified, including requirements becoming applicable through affiliation, professional registration, participation, contractual commitment or entry into a governed activity.

CML-3.3 Mandatory or otherwise binding governing requirements shall be distinguished from recommendations, guidance and voluntary good practice.

CML-3.4 Activities shall be conducted in conformity with all applicable mandatory governing requirements.

CML-3.5 Relevant changes to applicable governing requirements shall be identified and incorporated into affected activities where necessary.

Indicators

- Applicable governing bodies, federations and competent authorities are identified.
- Current mandatory requirements are accessible.
- Mandatory requirements and voluntary guidance are distinguishable.
- Operational evidence demonstrates conformity.
- Changes in applicable rules are monitored and incorporated.

Verification and Non-Conformity Conditions

Verification includes a review of affiliations, licences, professional registrations or authorisations, governing requirements, relevant veterinary, participation, competition, examination, service or activity records, and operational evidence.

Minor non-conformity: Arises where applicable governing or professional requirements are substantially implemented, but individual documentation, updating or evidence is incomplete.

Major non-conformity: Arises where the organisation knowingly conducts an activity contrary to a material mandatory governing or professional requirement affecting lawful operation, horse wellbeing, participant or beneficiary protection, safety, safeguarding, professional integrity or activity integrity.

Criterion CML-4 – Legal History and Regulatory Integrity

The organisation shall demonstrate a legal and regulatory history compatible with responsible operation, horse wellbeing and environmental protection.

Compliance Requirements

CML-4.1 An authorised representative shall complete and sign a Legal Compliance and Regulatory History Declaration.

CML-4.2 During the 24 months preceding the certification decision, the organisation shall not have received a final conviction, final administrative sanction or final financial penalty for a serious breach causing, or presenting significant risk of, material harm to horses, people or the environment, or materially demonstrating that the organisation is not operating responsibly within the proposed certification scope

CML-4.3 Formal investigations or enforcement proceedings initiated by competent authorities concerning alleged serious horse-welfare, environmental, safeguarding, safety, employment or other material regulatory harm relevant to the certification scope shall be disclosed.

CML-4.4 Relevant regulatory warnings, improvement notices or enforcement measures shall be disclosed together with evidence of actions taken.

CML-4.5 Regulatory information submitted during certification shall be complete, accurate and not intentionally misleading.

Indicators

- A signed regulatory-history declaration is available.
- No disqualifying final legal decision is identified within the defined period.
- Relevant formal investigations have been disclosed.
- Regulatory notices and corrective actions are traceable.
- Declarations correspond with available official evidence.

Verification and Non-Conformity Conditions

Verification includes declarations, official correspondence, public records where available, enforcement information and corrective-action evidence.

Minor non-conformity: Arises where a minor regulatory matter has been controlled, but disclosure or supporting documentation is incomplete.

Major non-conformity: Arises where a disqualifying serious final legal decision exists, material information has been deliberately concealed, a false declaration is submitted, or evidence is knowingly falsified.

Where a formal investigation concerning alleged serious horse-welfare or environmental harm remains unresolved, the certification decision may be placed on hold where the potential outcome could materially affect conformity.

Note: An allegation, media report, social-media publication or unverified third-party accusation alone shall not constitute evidence of legal non-compliance.

Criterion CML-5 – Leadership, Accountability and Resources

Top management shall demonstrate effective leadership and ensure that the responsibilities, authority, and resources necessary to maintain conformity are established.

Compliance Requirements

CML-5.1 A competent person shall be appointed to coordinate implementation and maintenance of the applicable requirements.

CML-5.2 Responsibilities, authorities and operational interfaces affecting legal compliance, horse wellbeing, participant or beneficiary protection, safety, environmental protection, social responsibility, economic sustainability, emergency response and corrective action shall be defined, including where responsibilities are shared with external parties.

CML-5.3 Top management shall demonstrate awareness of the certification scope, significant obligations, material risks and performance priorities.

CML-5.4 Adequate personnel, financial resources, authority, time and access to information shall be provided to maintain effective controls.

CML-5.5 Material compliance failures, horse-welfare concerns, environmental incidents, economic risks and unresolved corrective actions shall be appropriately escalated to top management.

Indicators

- Responsible coordination is formally established.
- Responsibilities and reporting lines are defined.
- Management demonstrates awareness of significant obligations and risks.
- Adequate resources and authority can be demonstrated.
- Material conformity issues can be traced to management oversight.

Verification and Non-Conformity Conditions

Verification includes appointments, organisational responsibilities, management interviews, resource decisions, budgets or equivalent evidence and escalation records.

Minor non-conformity: Arises where effective oversight exists but responsibilities, resources, reporting or documented evidence are incomplete.

Major non-conformity: Arises where accountability is absent, management knowingly permits material non-conformity, or where inadequate leadership or resources systematically compromise horse wellbeing, legal compliance, environmental protection, or the continuity of responsible operations.

Criterion CML-6 – Sustainability & Horse Wellbeing Policy

The organisation shall establish, approve, implement, and maintain a documented Sustainability & Horse Wellbeing Policy that governs activities within the certification scope.

Compliance Requirements

CML-6.1 The Policy shall be formally approved by top management and apply to all relevant activities under the organisation's operational control.

CML-6.2 The Policy shall address the four pillars of Environment, Social Responsibility, Economic Sustainability and Horse Wellbeing.

CML-6.3 The Policy shall establish the governance principles, operational controls, responsibilities and implementation arrangements necessary to address legal compliance, horse wellbeing, environmental protection, responsible resource use, responsible business practices and continual improvement.

CML-6.4 Responsibilities for implementation, monitoring and review shall be defined.

CML-6.5 The Policy shall be periodically reviewed and updated where significant legal, organisational, operational or scope changes occur.

Indicators

- Current top-management-approved Policy is available.
- All four pillars are explicitly addressed.
- Governance principles and implementation controls are established.
- Responsibilities for implementation and review are identifiable.
- Policy review and revision can be demonstrated.

Verification and Non-Conformity Conditions

Verification includes review of the Policy, approval records, assigned responsibilities and objective evidence demonstrating implementation.

Minor non-conformity: Arises where the Policy is substantially implemented but individual elements, responsibilities, review, or communication are incomplete.

Major non-conformity: Arises where no effective Policy exists, a material pillar is omitted, management endorsement is absent, or actual practice materially contradicts the Policy.

Criterion CML-7 – Horse Wellbeing Governance and Welfare Intervention

Activities involving horses shall be governed so that horse wellbeing remains protected irrespective of ownership, commercial arrangements or the person responsible for day-to-day care.

Compliance Requirements

CML-7.1 Responsibility for horse-wellbeing oversight shall be defined for all horses present within activities or facilities under the organisation's operational control, including horses owned or managed by third parties.

CML-7.2 Persons responsible for horses shall have appropriate authority to report and escalate legitimate horse-wellbeing concerns, and the organisation shall maintain a defined process for responding to such concerns.

CML-7.3 Horse wellbeing shall be evaluated using relevant physical and behavioural indicators appropriate to the activity and horse. Absence of obvious resistance, vocalisation or visible injury shall not by itself demonstrate acceptable wellbeing where other indicators suggest pain, fear, distress or material welfare compromise.

CML-7.4 Notification of a horse owner, keeper, or other responsible person shall not, by itself, discharge the organisation's responsibility where a significant horse-wellbeing concern remains unresolved. Where necessary, the organisation shall take further reasonable action within its legal and contractual authority, including obtaining veterinary advice or escalating the concern to the appropriate competent authority.

CML-7.5 An activity, practice or condition shall not knowingly continue where objective evidence indicates that continuation would expose a horse to significant avoidable pain, injury, distress, exhaustion, mistreatment or other serious welfare risk. No person shall be pressured to continue an activity with a horse where a reasonable material welfare concern remains unresolved.

Indicators

- Horse-wellbeing oversight is clearly assigned irrespective of horse ownership.
- A practical welfare-reporting and escalation process is available.
- Significant illness, injury, pain or distress results in an appropriate competent or veterinary assessment.
- Third-party ownership does not prevent appropriate welfare intervention.
- Operational decisions demonstrate that horse wellbeing takes precedence over commercial, instructional, competitive or scheduling pressures.

Verification and Non-Conformity Conditions

Verification includes examining welfare responsibilities, livery or user agreements (where relevant), emergency veterinary arrangements, incident and welfare records, complaints, veterinary evidence, interviews, and observation of actual practice.

Minor non-conformity: Arises where horse-wellbeing governance is substantially effective but individual responsibilities, escalation records, communication or follow-up evidence are incomplete without significant welfare consequences.

Major non-conformity: Arises where serious horse-wellbeing concerns are knowingly ignored, veterinary assessment is unreasonably withheld where significant welfare risk exists, management permits serious mistreatment or avoidable suffering to continue, or a person is knowingly pressured to continue an activity with a horse presenting significant unresolved welfare concerns.

Criterion CML-8 – Environmental Responsibility

The organisation shall govern its activities to prevent significant environmental harm, manage material environmental impacts and support responsible use of natural resources.

Compliance Requirements

CML-8.1 Material environmental impacts relevant to the certification scope shall be identified.

CML-8.2 Responsibilities and controls shall be established for material impacts associated with energy, greenhouse gas emissions, transport and mobility, water, wastewater, waste, manure, air quality, noise or lighting where material, harmful substances, land, soil, biodiversity, resource use and other relevant environmental matters.

CML-8.3 Environmental objectives and controls shall consider the prevention of pollution and the protection of soil, water, air, habitats and biodiversity.

CML-8.4 Material environmental incidents and abnormal conditions shall be recorded, investigated and appropriately addressed.

CML-8.5 Environmental performance shall be periodically evaluated using appropriate qualitative and quantitative evidence, and improvement actions shall be established where necessary.

Indicators

- Material environmental impacts are identified.
- Responsibilities and operational controls are established.
- Pollution prevention and resource protection are demonstrable.
- Environmental incidents and corrective actions are traceable.
- Environmental performance and improvement can be demonstrated.

Verification and Non-Conformity Conditions

Verification includes environmental assessments, operational controls, performance information, incident records, improvement actions and relevant Activity Module evidence.

Minor non-conformity: Arises where environmental controls are substantially effective, but individual identification, monitoring, measurement or review elements are incomplete.

Major non-conformity: Arises where significant environmental risks are knowingly uncontrolled, serious environmental harm results from inadequate controls, or material unlawful environmental practices occur.

Criterion CML-9 – Social & Cultural Responsibility

Activities shall be governed under lawful, fair, respectful and socially responsible conditions and shall recognise the organisation's relationship with employees, communities and relevant equestrian cultural traditions.

Compliance Requirements

CML-9.1 Employment, volunteer and working practices under the organisation's control shall comply with applicable labour, equality, occupational health and safety, safeguarding and other relevant social requirements.

CML-9.2 Appropriate controls shall prevent discrimination, harassment, abuse, coercion and inappropriate treatment and shall support safeguarding, dignity, accessibility and inclusion where relevant to employees, volunteers, participants, beneficiaries, visitors or other affected people.

CML-9.3 Local employment, development of local skills and professional development shall be supported where reasonably practicable and compatible with competence requirements.

CML-9.4 The organisation shall identify appropriate opportunities to support local communities, charities, educational initiatives, equestrian heritage or other relevant social and cultural activities.

CML-9.5 Employees and relevant stakeholders shall have access to appropriate mechanisms for raising social, ethical, safeguarding or employment concerns.

Indicators

- Fair employment and responsible workplace controls are implemented.
- Safeguarding and non-discrimination arrangements are identifiable.
- Local employment or skills-development activity can be demonstrated.
- Community, charitable, educational or cultural participation is evident.
- Appropriate reporting or grievance mechanisms are accessible.

Verification and Non-Conformity Conditions

Verification includes employment documentation, safeguarding arrangements, local employment information, community or charitable activity, grievance mechanisms and interviews.

Minor non-conformity: Arises where social responsibilities are substantially implemented but individual documentation, monitoring or communication is incomplete.

Major non-conformity: Arises where systemic discrimination, exploitation, serious safeguarding failure, retaliation or material unlawful employment practice is demonstrated.

Criterion CML-10 – Economic Responsibility and Organisational Resilience

The organisation shall manage its activities with sufficient economic responsibility and operational resilience to maintain legal compliance, horse wellbeing and material sustainability commitments over time.

Compliance Requirements

CML-10.1 The organisation shall identify material operating costs and financial dependencies capable of affecting the continuity of responsible activities.

CML-10.2 Adequate financial and operational resources shall be available for essential horse care, competent personnel, maintenance, legal obligations, emergency response and material environmental controls.

CML-10.3 Significant financial or operational risks capable of compromising horse wellbeing, safety, legal compliance or continuity of service shall be identified and evaluated.

CML-10.4 Resource-efficiency and cost-control decisions shall consider their effects across all four sustainability pillars and shall not knowingly transfer unacceptable risks to another pillar.

CML-10.5 Material economic risks, significant cost trends and resilience priorities shall be periodically reviewed and considered in operational planning.

Indicators

- Material operating costs and dependency areas are understood.
- Essential responsibilities are supported by adequate resources.
- Significant economic and continuity risks are identified.
- Cost-control decisions demonstrate consideration of wider sustainability impacts.
- Economic resilience and material cost trends inform planning.

Verification and Non-Conformity Conditions

Verification includes evidence of appropriate financial or operational planning, resource allocation, maintenance and staffing information, management interviews, risk records, and continuity arrangements. The assessment does not require disclosure beyond what is reasonably necessary to demonstrate conformity.

Minor non-conformity: Arises where economic controls are generally effective, but material risks, trends, responsibilities or planning evidence are incomplete.

Major non-conformity: Arises where systemic economic or resource failure materially threatens essential horse care, legal compliance, safety or continuity of responsible operations, or where management knowingly pursues financial savings that create significant, unacceptable welfare, environmental or safety impacts.

Criterion CML-11 – Responsible Procurement and Supply Chain

Goods and services used within the certification scope shall be procured through controls that consider legality, suitability, horse wellbeing, environmental responsibility, social responsibility, economic value and local economic contribution.

Compliance Requirements

CML-11.1 Purchasing controls shall define relevant legal, quality, environmental, ethical, horse-wellbeing, social and economic considerations.

CML-11.2 Suppliers, contractors and external professional or service providers whose products or activities can materially affect horse wellbeing, safety, safeguarding, environmental performance, service integrity or legal compliance shall be appropriately evaluated before or during use according to the significance of the risk.

CML-11.3 Local suppliers, products and professional services shall be considered where suitable, available, competent and economically reasonable.

CML-11.4 Products or services known to present unacceptable legal, welfare, environmental or ethical risks shall not be knowingly procured.

CML-11.5 Material supplier performance, risks and corrective actions shall be periodically evaluated.

Indicators

- Responsible purchasing criteria are established.
- Material or horse-critical suppliers are appropriately evaluated.
- Consideration of local supply can be demonstrated.
- High-risk products or services are controlled.
- Supplier performance and corrective actions are traceable.

Verification and Non-Conformity Conditions

Verification includes purchasing controls, supplier records, contracts, invoices, evidence of competence, supplier evaluations, and corrective actions.

Minor non-conformity: Arises where appropriate procurement controls exist but supplier screening, monitoring or records are incomplete.

Major non-conformity: Arises where an unauthorised or demonstrably unsuitable supplier is knowingly used for a regulated or horse-critical service, or procurement materially conflicts with mandatory legal, welfare or environmental requirements.

Criterion CML-12 – Competence, Education and Awareness

People whose work can materially affect horse wellbeing, legal compliance, safety, sustainability performance or conformity shall be competent and appropriately aware of their responsibilities.

Compliance Requirements

CML-12.1 Competence, professional-boundary and awareness requirements shall be identified for roles capable of materially affecting certified activities, including roles involving horses, participants, beneficiaries, safety-critical functions, regulated professional services or environmental controls.

CML-12.2 Persons shall receive appropriate induction, information and instruction before undertaking relevant unsupervised responsibilities and shall understand their authority and obligation to recognise, report and escalate significant horse-wellbeing, safety, environmental or compliance concerns.

CML-12.3 Legally or professionally required qualifications, licences, registrations, authorisations and competencies shall be maintained where applicable, and persons shall operate within any defined conditions, limitations or scope of professional authority.

CML-12.4 Training, instruction or supervision shall be provided where competence or awareness gaps are identified.

CML-12.5 Competence and awareness shall be periodically evaluated through records, interviews, observation, performance results, incidents or another appropriate method.

Indicators

- Competence requirements for relevant roles are identifiable.
- Appropriate induction and awareness evidence is available.
- Required licences or qualifications are current.
- Identified gaps lead to training, instruction or supervision.
- Operational evidence confirms competence and awareness.

Verification and Non-Conformity Conditions

Verification includes qualifications, training, induction, awareness activities, interviews and observation of relevant activities.

Minor non-conformity: Arises where competence is generally adequate, but individual training, refresher or evaluation evidence is incomplete.

Major non-conformity: Arises where legally required competence is absent, unqualified persons perform material-risk functions or systemic competence failure creates significant risk to horses, people, the environment or legal compliance.

Criterion CML-13 – Risk, Incident and Emergency Control

Material risks associated with activities within the certification scope shall be identified, evaluated, and controlled, and suitable arrangements shall be in place for incidents and emergencies.

Compliance Requirements

CML-13.1 Material risks affecting horses, participants, beneficiaries, visitors, workers, the public, the environment, infrastructure or continuity of responsible activity delivery shall be identified and evaluated. Assessment shall consider, where applicable, biosecurity, transport and loading, weather and climate conditions, remote or off-site activities, temporary facilities, visiting horses, third-party providers, shared responsibilities, capacity changes and temporary or event-based operations.

CML-13.2 Appropriate preventive controls, responsibilities and escalation arrangements shall be established.

CML-13.3 Significant incidents and relevant near misses shall be recorded and investigated proportionately to their severity. The investigation shall, where appropriate, evaluate immediate causes, underlying or systemic causes, the effectiveness of existing controls and whether the event represents an isolated occurrence or evidence of a recurring or wider management system failure.

CML-13.4 Corrective or preventive actions arising from incidents and risk assessments shall be assigned and monitored.

CML-13.5 Emergency arrangements shall be appropriate to the nature, location and scale of the activities and shall include, where applicable, veterinary emergencies, serious horse-wellbeing incidents, human first aid and access to medical assistance, safeguarding emergencies, fire or evacuation, biosecurity events, horse escape, transport-related incidents, extreme weather, remote-activity response, temporary-stable conditions and situations in which the usual responsible person is unavailable, unwilling or unable to respond appropriately.

Indicators

- Current risk assessments or equivalent evaluations are available.
- Significant risks have defined controls and responsibilities.
- Incident and relevant near-miss records are maintained.
- Actions arising from risks and incidents can be traced to completion.
- Emergency arrangements are maintained and appropriately reviewed.

Verification and Non-Conformity Conditions

Verification includes risk assessments, incident records, emergency arrangements, testing evidence and corrective actions.

Minor non-conformity: Arises where controls are effective but individual assessments, records, testing or follow-up are incomplete.

Major non-conformity: Arises where a known critical risk remains uncontrolled, serious incidents are deliberately concealed or not investigated, or emergency arrangements are materially incapable of protecting horses or people.

Criterion CML-14 – Documented Evidence, Data Integrity and Traceability

The organisation shall maintain reliable, traceable and proportionate objective evidence capable of demonstrating conformity and supporting quantitative performance evaluation.

Compliance Requirements

CML-14.1 Documents, records and source information necessary to demonstrate conformity shall be identifiable, retrievable and appropriately retained. Where evidence contains personal, beneficiary, health, veterinary or other confidential information, access, use and retention shall be controlled in accordance with applicable confidentiality and data-protection requirements.

CML-14.2 Information presented as evidence shall correspond with actual activity delivery and underlying source records.

CML-14.3 Quantitative information used for performance measurement, benchmarking, certification assessment or public claims shall identify its source, reporting period, unit of measurement, calculation methodology and relevant assumptions, estimates, conversions or emission factors where applicable.

CML-14.4 Significant modifications to controlled records, calculations or data shall be traceable where relevant to conformity or reported performance, and conversions or normalisation applied for benchmarking purposes shall be reproducible from the underlying source data.

CML-14.5 Evidence presented during assessment shall not be deliberately altered, falsified, fabricated, concealed or materially misleading.

Indicators

- Relevant evidence is identifiable and retrievable.
- Reported information can be traced to source records.
- Quantitative data and calculations are reproducible.
- Material changes to evidence or data are identifiable.
- No unexplained material inconsistency exists between reported evidence and actual practice.

Verification and Non-Conformity Conditions

Verification includes record sampling, source-data tracing, calculations, performance reports, invoices, monitoring data and comparison with operational observation.

Minor non-conformity: Arises where reliable evidence exists but individual traceability, retention, methodology or documentation elements are incomplete.

Major non-conformity: Arises where significant evidence cannot be produced, data are systematically unreliable, or information has been deliberately altered, falsified, fabricated or concealed.

Criterion CML-15 – Complaints, Concerns, Non-Conformity and Corrective Action

Complaints, concerns and identified non-conformities shall be evaluated and addressed in a manner proportionate to their significance, and corrective action shall address underlying causes where relevant.

Compliance Requirements

CML-15.1 Clients, horse owners, participants, beneficiaries, employees, volunteers, visitors and other relevant stakeholders shall have access to an appropriate mechanism for raising legitimate complaints, safeguarding concerns, safety concerns or horse-wellbeing concerns, including a means of escalating a serious concern independently where the person who would normally receive the complaint is directly involved in the matter.

CML-15.2 Complaints, incidents and identified non-conformities shall be recorded, evaluated and prioritised according to significance.

CML-15.3 Serious horse-welfare, safeguarding, environmental, legal or integrity concerns shall be appropriately escalated.

CML-15.4 Corrective action shall address the immediate issue and, where relevant, identify and address the underlying or systemic cause.

CML-15.5 Corrective actions shall be reviewed for effectiveness, and recurring issues shall trigger further evaluation.

Indicators

- Complaint and concern mechanisms are accessible.
- Complaints and non-conformities are recorded and prioritised.
- Serious matters demonstrate appropriate escalation.
- Corrective actions address causes as well as immediate failures where relevant.
- Effectiveness review and recurrence monitoring are demonstrable.

Verification and Non-Conformity Conditions

Verification includes complaints, findings, investigations, corrective actions, root-cause analysis, escalation evidence and effectiveness review.

Minor non-conformity: Arises where matters are generally controlled but individual documentation, analysis, response or effectiveness review is incomplete.

Major non-conformity: Arises where serious matters are deliberately suppressed, recurring material failures remain unresolved, legally reportable matters are knowingly not escalated, or corrective-action processes are systemically ineffective.

Criterion CML-16 – Objectives, Measurement and Continual Improvement

The organisation shall establish measurable improvement objectives and use objective performance information to demonstrate continuing development across material areas of the certification scope.

Compliance Requirements

CML-16.1 Improvement objectives shall be established for material areas relevant to the four sustainability pillars and applicable Core Topics.

CML-16.2 Objectives shall include responsibilities, target dates, baseline information and measurable outcomes where reasonably practicable.

CML-16.3 Progress shall be periodically evaluated using objective qualitative and quantitative evidence, including applicable benchmarking indicators, baselines, trends and benchmark information where available.

CML-16.4 Where objectives are not progressing as intended, causes shall be evaluated and actions, resources or targets adjusted where appropriate.

CML-16.5 Completed objectives, benchmarking results, benchmarking information, significant performance trends and identified performance gaps shall inform subsequent priorities and continual improvement.

Indicators

- Current improvement objectives are established.
- Responsibilities, dates, baselines and measurable outcomes are defined where applicable.
- Progress is supported by objective evidence.
- Underperformance results in evaluation and adjusted action.
- Successive planning cycles demonstrate progression and learning.

Verification and Non-Conformity Conditions

Verification includes objectives, baselines, performance information, action plans, trend analysis and completed improvement actions.

Minor non-conformity: Arises where objectives exist but measurement, baseline, responsibility, monitoring or review is incomplete.

Major non-conformity: Arises where no meaningful improvement process exists, material known deficiencies repeatedly remain unaddressed, or objectives exist only nominally without implementation.

Criterion CML-17 – Periodic Management Review

Top management shall periodically review whether the controls supporting activities within the certification scope remain suitable, adequate and effective.

Compliance Requirements

CML-17.1 A formal management review shall be completed at least annually.

CML-17.2 The review shall consider applicable legal, professional and governing requirements, significant regulatory or organisational changes, changes in certification scope, activities, capacity, facilities or third-party arrangements, and material risks.

CML-17.3 The review shall consider performance across Environment, Social Responsibility, Economic Sustainability and Horse Wellbeing and relevant material Core Topics.

CML-17.4 The review shall consider objectives, benchmarking results, benchmarking and performance trends, competence and resource adequacy, emergency readiness, relevant supplier or contractor performance, complaints, incidents, non-conformities, corrective actions and improvement performance.

CML-17.5 Decisions arising from management review shall identify actions, responsibilities, priorities and resources where necessary and shall be monitored to completion.

Indicators

- Annual management-review evidence is available.
- Legal, governing and material change considerations are included.
- All four sustainability pillars are represented.
- Performance, objectives, benchmarking, incidents and corrective actions are evaluated.
- Decisions and follow-up actions are traceable.

Verification and Non-Conformity Conditions

Verification includes review records, performance information, decisions, action logs and interviews with top management.

Minor non-conformity: Arises when management review is undertaken, but individual inputs, outputs, quantitative evidence, or follow-up are incomplete.

Major non-conformity: Arises where no effective management review occurs, material legal or horse-welfare matters are systematically excluded, or management repeatedly fails to act upon known significant conformity failures.

Criterion CML-18 – Sustainability & Horse Wellbeing Statement, Transparency, Incident Communication and Public Claims

The organisation shall communicate its sustainability and horse-wellbeing commitments, verified performance, certification status and material public-interest information accurately, transparently and in a manner supported by objective evidence. Where a significant incident is publicly witnessed, becomes publicly known or is reasonably likely to generate material concern regarding horse or human wellbeing, communication shall be factual, appropriately verified and responsibly managed.

Compliance Requirements

CML-18.1 The organisation shall maintain a publicly accessible Sustainability & Horse Wellbeing Statement that communicates its commitments across the four sustainability pillars.

CML-18.2 The Statement and other material public communications shall accurately reflect the Sustainability & Horse Wellbeing Policy, actual activities, verified performance and the defined SEI certification scope. Where a significant incident becomes publicly relevant, communications shall accurately reflect the facts confirmed at the time and shall not speculate beyond verified information.

CML-18.3 Material sustainability, environmental, social, economic, horse-wellbeing, certification and significant incident-related claims shall be specific, accurate and supported by current identifiable objective evidence. Information concerning horse condition, treatment or outcome shall be appropriately verified before public release.

CML-18.4 Verified achievements and measured performance shall be clearly distinguishable from objectives, intentions, ambitions, future commitments, estimates and unverified claims. Absolute, generic or comparative sustainability and environmental claims shall not be made where they cannot be objectively substantiated.

CML-18.5 Public information shall be periodically reviewed, and inaccurate, outdated, unsupported, ambiguous or materially misleading information shall be corrected or withdrawn without undue delay. Where significant incidents generate public concern or misinformation, verified information shall be communicated appropriately while respecting privacy, consent and confidentiality relating to affected persons.

Indicators

- A current public Sustainability & Horse Wellbeing Statement is accessible.
- Public communication corresponds with actual activities, policy, statement and certification scope.
- Material claims can be traced to objective evidence and quantitative data where applicable.
- Verified achievements and aspirations are clearly distinguishable.
- Public and incident-related communications are periodically reviewed and corrected where necessary.

Verification and Non-Conformity Conditions

Verification shall include sampling the evidence supporting material sustainability and certification claims and comparing such claims with the organisation's actual certification scope and applicable benchmarking results. Where significant publicly relevant incidents have occurred, verification shall include incident records, authorised communications, supporting veterinary or competent-person information where relevant, subsequent updates and evidence that privacy and confidentiality were respected.

Minor non-conformity: Arises where public communication is substantially accurate but individual information is outdated, incomplete, insufficiently contextualised or supported by incomplete evidence without materially misleading stakeholders.



Major non-conformity: Arises where no required public Statement exists, material claims are false or unsupported, certification is deliberately represented beyond its scope, actual practice materially contradicts public communication, or deliberate greenwashing, welfare-washing or material misrepresentation is identified.