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# **RTRS Standard Revision 2020/21**

## **Process Report**

Document under review:

**RTRS Standard for Responsible Soy Production V3.1**

July 2021

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Prepared by:



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# 1. Introduction

This report is summarizing the review process of the standard revision of the Roundtable on Responsible Soy (RTRS) which took place between July 2020 and June 2021 and was conducted by the Secretariat with the support of the facilitators of BSD Consulting. Scope of the revision was the RTRS Standard for Responsible Soy Production V3.1 which was valid since June 2017 and will be replaced by the current version 4.0 after having incorporated different updated and suggestion from public comments received.

The RTRS Standard for Responsible Soy Production, version 4.0 (from now on “RTRS Standard”) is the result of a multi-stakeholder development process, which involved representatives from the three RTRS membership constituencies, that included several public consultation periods and evaluations by the RTRS board.

The objective of the RTRS standard is to promote the responsible soy production worldwide addressing issues as:

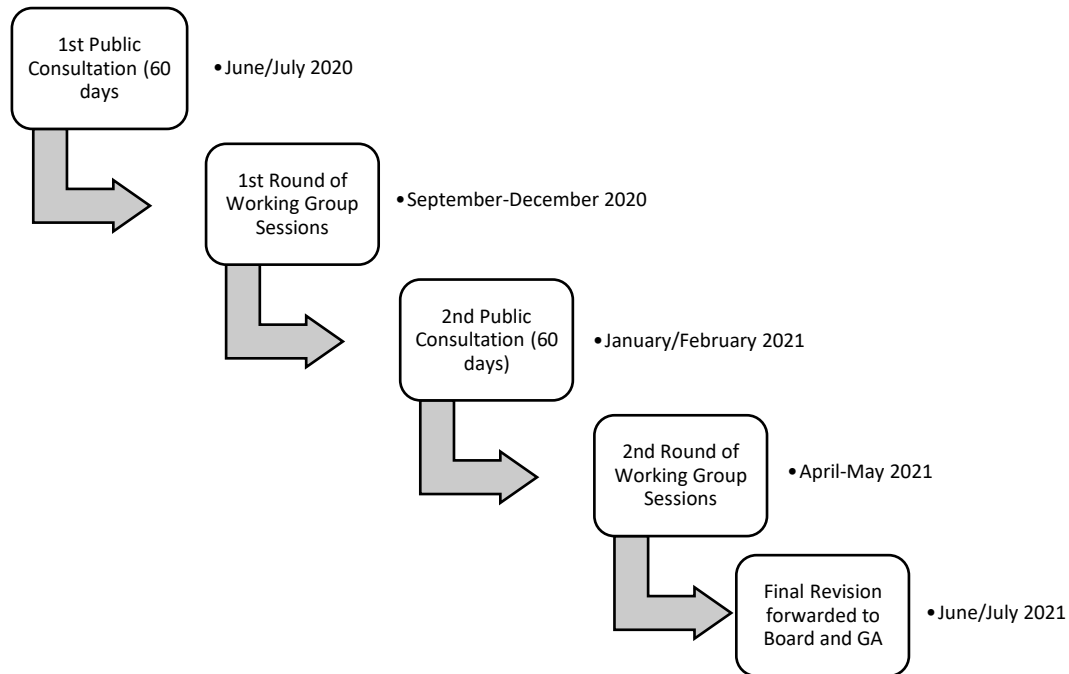
- Legal Compliance and Good Business Practices
- Responsible Labor Conditions
- Good Relationship with the Communities
- Environmental Responsibility
- Good Agricultural Practices

These objectives are equivalent to the 5 chapters of the standards which went through a solid revision process, following internal and internationally recognized best practice guidelines (namely ISEAL compliant practices) which suggest public consultations to provide broad engagement in the revision process. The intent of this report is to inform the RTRS board and other stakeholders on the process and inform the nature of the comments and the decision that have been taken during the review process to include or not include certain aspects receive in the consultation process.

The authors of the report have been responsible to conduct the discussions with the revision working group which has been composed of representatives and observers of the three constituencies of RTRS (Producers, Industry/Trade/Finance – ITF - and Civil Society) during two session cycles which resulted in the final edits to the standard. All sessions have been conducted online due to the Covid-19 pandemic situation in English, Portuguese and Spanish with the official document and edits being made in English. All edits in this report are presented in English.

## 2. Timeline of the Revision

The Review Process took a total of 13 months, starting in June 2020 with the first public consultation period and ending in June 2021 with the final meeting of the Review Technical WG (RTWG).



*Timeline of the Revision Process.*

At the time of writing of the report, the final version was under evaluation of the Board for final approval.

## 3. Revision Working Group

### 3.1 Composition

The Revision Working Group (further WG) has been selected during the month of August 2020. The three constituencies (Industry, Trade and Finance - ITF, Civil Society Organizations and Producers) were represented in the WG. A minimum of four members per constituency was required and a maximum of five members per constituency was admitted. Additionally, different experts were invited to participate as observers of this WG. The following organizations and representatives were part of the WG (up to two representatives were allowed to participate in the meetings):

Constituency	Role	Organization	Name
Producers	Observer	Caldenes S.A.	Gustavo Soto
Producers	Member	Fazendas Bartira Agropecuária S.A.	Luiz Iaquina
Producers	Member	CAT Sorriso	Cristina Delicato Julia Teresa Silva Ferreira
Producers	Member	FAPCEN	Gisela Introvini Samaycon Gonçalves
Producers	Member	Amaggi	Patricia Takase Rafael Pereira
Producers	Observer	Viluco S.A.	Noelia Lescano
Producers	Member	Tecnocampo S.A.	Francisca Llorens Javier Amuchastegui
Producers	Observer	Independent Producer	Manuel Chiappe
ITF	Observer	De Heus Voeders B.V.	Michiel Peters
ITF	Member	Koppert Biological Systems	Marcelino Borges de Brito
ITF	Observer	Louis Dreyfus Company	Murillo Alves Moreira Paloma Silva
ITF	Member	Unilever	Mark Day Cintia Vega
ITF	Member	Cooperativa Agropecuária de Acopiadores Federados	Cecilia Piermatei
ITF	Member	Rabobank	Aline Camargo Aguiar
ITF	Member	ACT Commodities	Jorn Schouten
Civil Society	Member	TNC	Caroline Holtz Rolim Hernan Zunino
Civil Society	Member	Solidaridad	Adriana Aquino
Civil Society	Member	CDP	Isabele Goulart
Civil Society	Member	Aliança da Terra	Christiane Mendes Simioli
Civil Society	Member	Fundación Vida Silvestre	Ulises Martinez
Observer	Observer	Control Union	Talita Asano Tomas Pueta
Observer	Observer	Viridi Soluções Ambientais	Rafaela Gallindo Perez
Observer	Observer	Cerquality	Ismael Trevisan
<b>Moderators (support staff without voting rights)</b>			
RTRS-Staff	Ana Laura Andreani, Daniel Kazimierski, RTRS Secretariat, Argentina; Cid Sanches, External Consultant, Brazil		
BSD Consulting	Beat Grüninger, Marco Pere, Brazil, and Mark Starmanns, Switzerland		

## 3.2 Schedule of Sessions

The WG-Sessions have been prepared by the RTRS-Secretariat (Ana Laura Andreani and Daniel Kazimierski) and by the consultant team of BSD Consulting (Beat Gruninger, Marco Perez and Mark Starmanns). The team participated in the sessions that were moderated by BSD Consulting.

Between September 2020 and June 2021, a total of 12 meetings (including the kick-off session) have been held to review to comments that have been posted in the public consultations. Both rounds have counted with the participation of the same WG presented above. All sessions have been hold online using the Zoom-conference call-tool.

First round of WG-sessions to discuss comments of the first public consultation:

- Kick-Off (Tuesday, 1/9, 11-12 BR Time)
- 1<sup>st</sup> Meeting WG: Tuesday, September 8, 2020, 10-12h BR Time
- 2<sup>nd</sup> Meeting WG: Monday, September 28, 2020, 10-12:30h BR Time
- 3<sup>rd</sup> Meeting WG: Tuesday, October 13, 2020, 10-12:30h BR Time
- 4<sup>th</sup> Meeting WG: Tuesday, October 27, 2020, 10-12:30h BR Time
- 5<sup>th</sup> Meeting WG: Thursday, November 12, 2020, 10-12:30 BR Time
- 6<sup>th</sup> Meeting WG: Thursday, November 19, 2020, 10-12:30 BR Time
- 7<sup>th</sup> Meeting of WG: Wednesday, December 2, 2020, 10-12:30 BR Time

Second round of WG-sessions to discuss comments of the second public consultation:

- 1<sup>st</sup> meeting: Thursday, April 8, 2021. 10-12.30h BR Time
- 2<sup>nd</sup> meeting: Wednesday, April 28, 2021, 10-12.30h BR Time
- 3<sup>rd</sup> meeting: Thursday, May 13, 2021, 10-12.30h BR Time
- 4<sup>th</sup> meeting: Monday, May 31, 2021, 10-12.30h BR Time

Each meeting has observed the following steps:

- Preparation of the comments and suggestions separate by Principles of the RTRS-standard to be discussed during the meetings, edited in a Powerpoint presentation.
- Each Powerpoint presentation has been translated from English to Spanish and Portuguese in order to allow better preparation and comprehension of the comments by the WG-members.
- During the sessions, the English Powerpoint has been used and suggestions have been discussed to reach in a way to reach consensus on the revisions. Discussions have been held in English, Portuguese and Spanish in order to facilitate communication between the members and guarantee that all members could give their opinions.
- Final edits in both rounds have been approve by a qualified quorum of participants but no formal voting has been necessary.

The final draft with all accepted revision has been circulated in June to all WG-members by e-mail and members could make final comments before the text with the agreed revisions was submitted for approval to the Executive Board and the General Assembly of RTRS.

## 4. Review of public consultations and comments

### 4.1 Summary data on public consultations

- Period of the first public consultation: June 1<sup>st</sup> 2020 – August 3<sup>rd</sup> 2020
- Number of comments received per principle:

<b>Principle</b>	<b>No. of public comments received</b>
Principle 1: Legal Compliance and Good Business Practices	6
Principle 2: Responsible Labour Conditions	23
Principle 3: Responsible Community Relations	4
Principle 4: Environmental Responsibility	23
Principle 5: Good Agricultural Practices	33

- Period of the second public consultation: January 6<sup>th</sup> 2021 – March 8<sup>th</sup> 2021
- Number of comments received per principle in the second round (this number includes comments that refer to AFI or FEFAC alignment beyond the public comments):

<b>Principle</b>	<b>No. of public comments received</b>
Principle 1: Legal Compliance and Good Business Practices	17
Principle 2: Responsible Labour Conditions	29
Principle 3: Responsible Community Relations	30
Principle 4: Environmental Responsibility	24
Principle 5: Good Agricultural Practices	18

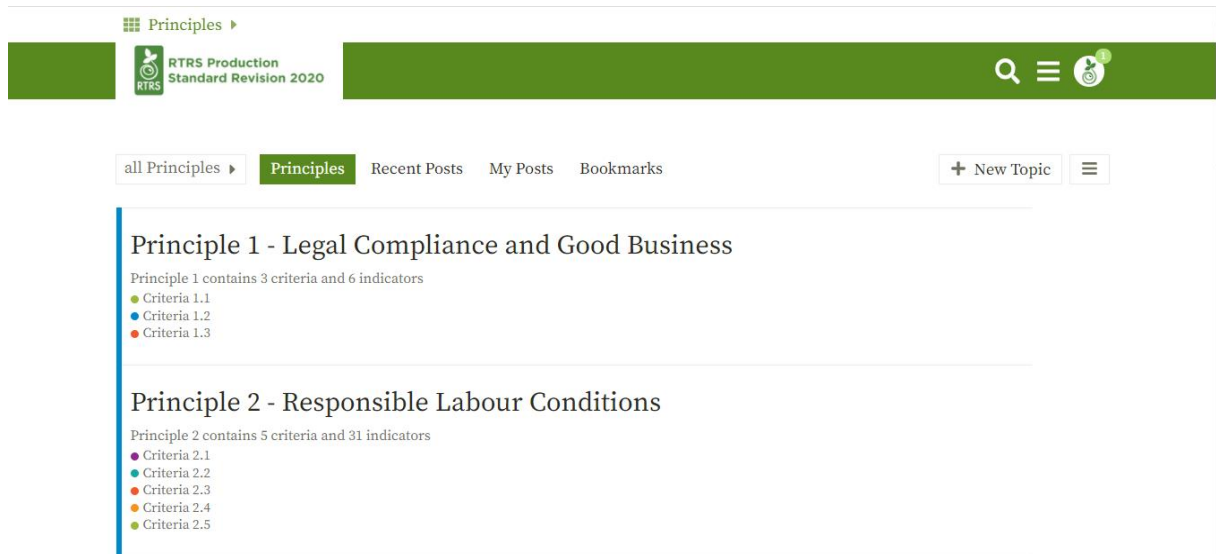
- Note on AFI and FEFAC:  
It has been objective of the revision to align the standard with the FEFAC (European Feed Manufacturers' Association) requirements as well as align the terminologies with the Accountability Framework initiative. The comments are tagged further below as AFI or FEFAC-comments.

### 4.2 Process of review of comments of the public consultations

The review process has been systematically organized along the following lines which describe the applied steps for the two rounds. The challenge has been to conduct all meetings online due to the pandemic situation.

For the review of the first public consultation, an Online Tool was used to collect inputs from all WG-members prior to the first WG-meeting. All comments have been uploaded to the tool and WG-members could comment and add additional comments, see screenshot of the Online Forum below. The Forum has only been used in the first round of the revisions.

Screenshot of the Online Forum:



Based on the collected comments, the moderators prepared possible suggestions for the revision which then were presented to the WG-members during the meetings.

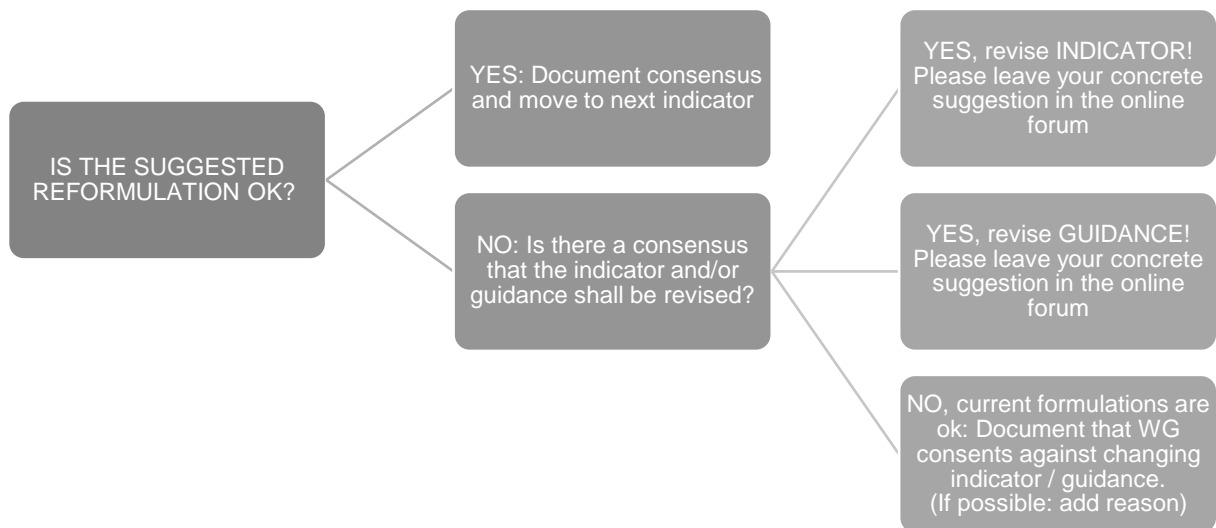
The suggestions were presented in a table that showed the original comment and the suggested solutions, asking the WG-members to decide on the next steps, below an example of how the comments were presented to the WG-members:

CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	WHO?	SUGGESTION ON INDICATOR	SUGGESTION ON GUIDANCE	QUESTION TO WORKING GROUP
2.1.1 No forced, compulsory, bonded, trafficked or otherwise involuntary labour is used at any stage of production.	2.1.1 Personnel should be free to leave their workplace after their hours of work have been completed, and be free to terminate their employment provided that they give reasonable notice.  Reference: ILO Convention 29 on Forced Labour and 105 on Abolition of Forced Labour.	Is there any guidance for if child labour (13 and below) is found and how to handle it? Suggest making a protocol for how to handle cases when child labour is found that the review is holistic and looking at the whole context.	Public		DEVELOP NEW GUIDANCE on what who shall do when forced labour is identified.	DEVELOP GUIDANCE on forced labour?
2.1.2 No workers of any type are required to lodge their identity papers with anyone and no part of their salary, benefits or property is retained, by the owner or any 3rd party, unless permitted by law		Should the word "permitted" be changed to required? Gives the worker more clarity when the word required is used.	Public	2.1.2 No workers of any type are required to lodge their identity papers with anyone and no part of their salary, benefits or property is retained, by the owner or any 3rd party, unless required by law.		REPHRASE 2.1.2 as suggested?

The comments have been translated where necessary into Spanish and Portuguese. The objective of the review sessions was to have consensus between the members on the necessary changes, following a decision tree:



Decision tree used in the process:



During the whole review round 1, the WG made further use of the Online Forum in order to collect possible suggestions and further comments between the meetings. In the final sessions, all agreed changes were presented and a final discussion led to the first Draft of the 4.0 standard that was validated by the Board and submitted to the second public consultation.

In the following tables, for each comment that was discussed, we shortly summarize the decision taken by the WG to integrate the suggested changes or discard the suggestions or the comment after due consideration. The detailed comments and registers of the discussions are available in a separate excel-sheet. The comments include, besides public comments, comments of WG members made using the Online Forum, too.

For the review of the second round of the public consultation, the Online Forum was not used and the comments were directly reviewed in three online meetings and validated in a fourth meeting. In the second round, all alignments of the glossary to AFI-definitions have been included. As the comments of the second round have been made already based on the first revisions, we confront the final versions with the already revised version. All revisions made in round 2 are marked in red and all final revisions made are marked in blue.

The column entitled Discussions is just summarizing the final decisions, we maintain a register of all comments made by WG members during the meetings, but the content of the detailed discussion would exceed the scope of this report.

## 4.3 Result of review of the first public consultation

### Summary of revisions in round 1 – PRINCIPLE 1: Legal Compliance and Good Business Practices

CRITERIA	INDICATOR	GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
1.1 There is awareness of, and compliance with, all applicable local and national legislation	1.1.1 Awareness of responsibilities, according to applicable laws can be demonstrated	Guidance 1.1.1 – 1.1.2 Producers need to have access to information, which enables them to know what the law requires them to do. Examples include having a register of laws, or access to relevant advice on legislation. Legal compliance should be verified through: <ul style="list-style-type: none"> <li>• checking available compliance available;</li> <li>• publicly data on where</li> <li>• interviews with staff and stakeholders;</li> <li>• field observations.</li> </ul>	none	A fundamental discussion was raised in the WG on clarify the scope of the verification of these indicators by auditing bodies and the need of a clear reference to local interpretation was demanded. A paragraph was added to the guidance.	<b>Guidance 1.1.1 – 1.1.2</b> Producers need to have access to information, which enables them to know what the law requires them to do. Examples include having a register of laws, or access to relevant advice on legislation. Legal compliance should be verified through: <ul style="list-style-type: none"> <li>- checking publicly available data on compliance where available;</li> <li>- interviews with staff and stakeholders;</li> <li>- field observations.</li> </ul> <b>The National Interpretation of the correspondent country will provide the scope of verification of the applicable law that producers need to demonstrate compliance with during the audit.</b>
	1.1.2 Applicable laws are being complied with		none		

CRITERIA	INDICATOR	GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
1.1 There is awareness of, and compliance with, all applicable local and national legislation	New indicator		<i>Include a criterion that forbids bribery.</i>	After longer discussions that this is part of legal compliance in different countries and therefore a specific indicator is not necessary, a new indicator was agreed.	<p><b>1.1.3 New indicator on bribery suggested</b></p> <p>Producers must not be involved in any act of corruption, extortion, or embezzlement, nor in any form of bribery - including but not limited to - the promising, offering, giving, or accepting of any improper monetary or another incentive.</p> <p><b>Guidance 1.1.3</b> Large producers shall have systems and a written policy in place to manage bribery risks in their organization.</p> <p>The systems shall:</p> <ul style="list-style-type: none"> <li>a. Identify and monitor those parts of the company that pose high risks of participation in bribery.</li> <li>b. Train relevant managers and employees on policies and procedures.</li> </ul> <p>The system may additionally include:</p> <ul style="list-style-type: none"> <li>c. Record of relevant gifts to and from third parties in a gift register, as per the company's policy.</li> <li>d. Investigation any incidences of suspected bribery within their organization.</li> <li>e. Sanction bribery and attempted bribery.</li> </ul> <p>The definition of large producers shall be determined on national level. In countries where there is a law related to this issue, legal compliance will be considered sufficient to comply with this indicator.</p>

CRITERIA	INDICATOR	GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
<p>1.3 There is continual improvement with respect to the requirements of this standard.</p> <p>Note: For group certification continual improvement may be recorded and monitored at the group level.</p>	<p>1.3.1 From the assessment required in 4.1.1, those social, environmental and agricultural aspects of the operation (on and off farm) where improvement is desirable are identified.</p> <p>Note: The producer is expected to be aware of the social and environmental context in which he/she is operating and the existing and possible future impacts of the operation.</p>	<p>Guidance 1.3.1 –1.3.2 – 1.3.3 It is recognized that sometimes there may not be improvement for specific continual improvement indicators due to circumstances beyond the control of the certificate holder.</p>	<p><i>Problem: The producers are free to choose the continual improvement indicators, but is there a requirement for a minimum of indicators?</i></p> <p><i>What is otherwise the incentive for producers to choose indicators for continual improvement? Continuous improvement refers to “good business practices”?</i></p> <p><i>Suggestion: There should be minimum indicators. Review the indicators to make them easier for producers (this is more “objective” with clear measurements and explained measurement methods, type of calculators from other programs).</i></p> <p><i>Is there guidance on what information should be collected for smallholder groups and large holders? Suggest making this guidance if not.</i></p> <p><i>Who guides what continuous improvement indicators to use? What if the company does not have expertise to do this work or knowledge of who to ask? Are the indicators from principle 4 and principle 5 clear for this continual improvement?</i></p>	<p>RTRS Secretariat makes data collection sheet available to WG. But there was a discussion in the WG on how many and which indicators would be suitable, WG-members also considered that indicators can change over time.</p> <p>Decision taken: To GUIDANCE 1.3.1-1.3.3 we add this sentence: "The producer shall monitor and review at least once a year on minimum indicators from the RTRS Data Collection Sheet to ensure continual improvement."</p>	<p><b>Add Guidance 1.3.1:</b> The producer will monitor and review annually at least 1 indicator per pillar of the RTRS Data Collection Sheet to ensure continuous improvement. The RTRS Data Collection Sheet is a guide and is not required to be used for this indicator.</p>
	<p>1.3.2 From these aspects identified in 1.3.1, a number of indicators are selected and a baseline is established to be able to monitor continual improvement on those aspects where desired improvements have been identified.</p> <p>Note: Producers are free to choose the continual improvement indicators that are relevant to them in order to prove that there is continual improvement with respect to the requirements of this standard; e.g. Soil carbon content, use of agrochemicals, state of riparian vegetation, etc. The baseline year is the year of first certification assessment.</p>		<p><i>Who does this monitoring? (internal or external) Suggest making this clear.</i></p>		
	<p>1.3.3 The results of monitoring are reviewed and appropriate action is planned and taken when necessary to ensure continual improvement.</p>				

## Summary of revisions in round 1 – PRINCIPLE 2: Responsible Labour Conditions

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
2.1 Child labour, forced labour, discrimination and harassment are not engaged in or supported.	2.1.1 No forced, compulsory, bonded, trafficked or otherwise involuntary labour is used at any stage of production.	2.1.1 Personnel should be free to leave their workplace after their hours of work have been completed, and be free to terminate their employment provided that they give reasonable notice. Reference: ILO Convention 29 on Forced Labour and 105 on Abolition of Forced Labour.	<i>Is there any guidance for if child labour (13 and below) is found and how to handle it? Suggest making a protocol for how to handle cases when child labour is found that the review is holistic and looking at the whole context.</i>	WG members discussed if Guidance 2.1.1 on forced labour shall be developed, following examples of more detailed provisions in other standards, but they agreed to leave the indicator the way it is.	No change.
	2.1.2 No workers of any type are required to lodge their identity papers with anyone and no part of their salary, benefits or property is retained, by the owner or any 3rd party, unless permitted by law.		<i>Should the word permitted be changed to required? Gives the worker more clarity when the word required is used.</i>	CONSENSUS to rephrase Indicator 2.1.2. using the word required.	2.1.2 No workers of any type are required to lodge their identity papers with anyone and no part of their salary, benefits or property is retained, by the owner or any 3rd party, unless <del>permitted</del> <b>required</b> by law.
	2.1.4 Children and minors (below 18) do not conduct hazardous work or any work that jeopardizes their physical, mental or moral well-being.	2.1.4 & 2.1.5 Children and minors (below 18) do not work in dangerous locations, in unhealthy situations, at night, or with dangerous substances or equipment, nor do they carry heavy loads. They are not exposed to any form of abuse and there is no evidence of trafficked, bonded or forced labour. Reference: ILO Convention 138 on Minimum Age and 182 on Worst Forms of Child Labour. When considered as legal and essential on family farms (see Glossary), children between 13 and 15 years old may carry out light productive activities during the peak season, providing this does not exceed 14 hours per week and does not interfere with their schooling. The number of hours in which these children may carry out light productive activities on family farms in summer shall be defined at National Interpretation level.	<i>What is the protocol for if child labour is found for under 13...how is it handled? Suggest clarifying and creating protocol.</i>  <i>Should state that no children under the age of 13 are to work on farms. Or can any child work on the family farm regardless of age following the "when children are part of the family and when they are not exposed to hazardous working conditions"?</i>	CONSENSUS on adapting Indicator 2.1.4 according to suggestion:  "Children below age 18 must not conduct hazardous work that is likely to jeopardize their physical, mental or moral well-being."	2.1.4 Children <del>and minors (below 18) do not</del> <b>below age 18</b> must not conduct hazardous work that <del>jeopardizes</del> <b>is likely to jeopardize</b> their physical, mental or moral well-being.

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
2.1 Child labour, forced labour, discrimination and harassment are not engaged in or supported.	<p>2.1.5 Children under 15 (or higher age as established in national law) do not carry out productive work.</p> <p>They may accompany their family to the field as long as they are not exposed to hazardous, unsafe or unhealthy situations and it does not interfere with their schooling.</p>	<p>2.1.5 Participation in some agricultural activities is not always considered as child labour. Age-appropriate tasks that are of lower risk and that do not interfere with children schooling and leisure time can be a normal part of growing up in a rural environment.</p> <p>Especially in the context of family farming, small-scale fisheries and livestock husbandry, some participation of children in non-hazardous activities can be positive as it contributes to inter-generational transfer of technical and social skills and children food security. Higher self-confidence, self-esteem and work skills are attributes often detected in young people engaged in some aspects of farm work. Therefore, it is important to distinguish between light duties, that do no harm children and child labour, which is work that interferes with compulsory schooling and damage health and personal development, based on hours and work conditions, age, activities and hazards involved.</p> <p>Source:  <a href="http://www.ilo.org/ipec/areas/Agriculture/lang-en/index.htm">http://www.ilo.org/ipec/areas/Agriculture/lang-en/index.htm</a></p>	<p><i>2.1.5 contradicts 2.1.4 or does it (2.1.5 Children under 15 (or higher age as established in national law) do not carry out productive work) while 2.1.4 (When considered as legal and essential on family farms (see Glossary), children between 13 and 15 years old may carry out light productive activities during the peak season, providing this does not exceed 14 hours per week and does not interfere with their schooling) stated in guidance</i></p> <p><i>Could we add an indicator like: "All children living in the management unit have access to primary school education"</i></p>	<p>WG members agree to improve indicator 2.1.5 to address the concern in the comment and to make the Guidance 2.1.4 &amp; 2.1.5 (see above) more coherent.</p> <p>Guidance 2.1.5 was not changed</p> <p>WG agreed to create a new indicator 2.1.5b addressing this demand.</p>	<p>Indicator 2.1.5 Children under 15 (or higher age, <del>as if</del> established in national law) may not carry out productive work (<del>paid or unpaid</del>).</p> <p><del>They may accompany their family to the field as long as they are not exposed to hazardous, unsafe or unhealthy situations and it does not interfere with their schooling.</del></p> <p>Guidance 2.1.4 &amp; 2.1.5 (see above 2.1.4) <del>Children and minors (below 18) do not work in do not work in dangerous locations.</del></p> <p><b>They may accompany their family to the field as long as they are not exposed to hazardous, unsafe or unhealthy situations and it does not interfere with their schooling. Hazardous work likely to jeopardize children's physical, mental or moral well-being is defined as: working in dangerous locations, in unhealthy situations, at night, or with dangerous substances or equipment, <del>nor do they or to</del> carry heavy loads. They are not exposed to any form of abuse and there is no evidence of trafficked, bonded or forced labour is forbidden.</b></p> <p>Reference: ILO Convention 138 on Minimum Age and 182 on Worst Forms of Child Labour.</p> <p><del>When considered as legal and essential on family farms (see Glossary), children between 13 and 15 years old may carry out light productive activities during the peak season, providing this does not exceed 14 hours per week and does not interfere with their schooling. The number of hours in which these children may carry out light productive activities on family farms in summer shall be defined at National Interpretation level.</del></p> <p><b>NEW INDICATOR</b>  <b>2.1.5b. All children of direct employees living on the farm must have access to school education.</b></p>

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
<p>2.1 Child labour, forced labour, discrimination and harassment are not engaged in or supported.</p>	<p>2.1.6 There is no engagement in, support for, or tolerance of any form of discrimination.</p> <p>2.1.7 All workers receive equal remuneration for work of equal value, equal access to training and benefits and equal opportunities for promotion and for filling all available positions.</p>	<p>Guidance 2.1.6-2.1.7 Discrimination includes, but is not limited to, any distinction, exclusion, restriction or preference based on race, colour, social class, nationality, religion, disability, sex, sexual orientation, pregnancy, HIV status, union membership or political association, with the purpose or effect of annulling, affecting or prejudicing the recognition, fruition or equal exercise of rights or liberties at work, be it in the process of contracting, remuneration, access to training, promotion, lay-offs or retirement. Divergence in salary is not considered discriminatory when the company has a policy that is fully known by employees, which specifies different pay scales for different levels of qualifications, length of experience, etc.</p> <p>Reference: ILO Convention 100 on Equal Remuneration, and ILO Convention 111 on Discrimination.</p>	<p><i>How are these requirements applied? Is a company policy in place? Where there are specific requirements that are policy related- how does RTRS check the evidence? Do they need written documentation as well as interviews? Good requirements, though.</i></p> <p><i>Problem: I would support a more pro-active role in fighting any form of discrimination</i> <i>Suggestion: Rephrase the indicator involved, support installation of a confidential counsellor</i></p> <p><i>Suggest adding "gender identity, ethnicity, language and literacy".</i></p> <p><i>Suggest adding "gender identity, ethnicity, language and literacy".</i></p> <p><i>Suggest adding "lateral transfers" to the definition of rights at work.</i></p> <p><i>Suggest adding "lateral transfers" to the definition of rights at work.</i></p>	<p>In response to these comments, WG members agreed the following:</p> <p>1. Making Indicator 2.1.6 more proactive regarding discrimination.</p> <p>2. Adding definition of Discrimination used in guidance also to Glossary.</p> <p>3. Rephase GUIDANCE 2.1.6</p>	<p><b>Guidance 2.1.6-2.1.7</b> <del>Discrimination includes, but is not limited to, any distinction, exclusion, restriction or preference based on race, colour, social class, nationality, religion, disability, sex, sexual orientation, pregnancy, HIV status, union membership or political association, with the purpose or effect of annulling, affecting or prejudicing the recognition, fruition or equal exercise of rights or liberties at work, be it in the process of contracting, remuneration, access to training, promotion, lay offs or retirement. Divergence in salary is not considered discriminatory when the company has a policy that is fully known by employees, which specifies different pay scales for different levels of qualifications, length of experience, etc.</del></p> <p><b>Discrimination includes, but is not limited to: Distinction, exclusion or preference to invalidate or harm equality of opportunity or treatment in employment, be it in the process of contracting, remuneration, access to training, promotion, lay-offs, lateral transfers or retirement, including:</b></p> <ul style="list-style-type: none"> <li>a) Ethnic group, colour, sex, sexual orientation, gender, caste, religion, political opinion, national extraction or social origin;</li> <li>b) Nationality or migratory status;</li> <li>c) Civil status or social class;</li> <li>d) Medical condition (including HIV status or disability);</li> <li>e) Family condition, including pregnant women and parents with children, or any other protected status as included in applicable laws;</li> <li>f) Worker organization membership or being an organizer;</li> <li>g) Having filed complaints within the complaints or grievance mechanisms;</li> <li>h) Unequal opportunities for gender when appointing management positions;</li> <li>i) Political, religious, social, sexual or cultural opinions and convictions, views or affiliations of workers.</li> </ul> <p>Divergence in salary is not considered discriminatory when the company has a policy that is fully known by employees, which specifies different pay scales for different levels of qualifications, length of experience, etc.</p> <p>Reference: ILO Convention 100 on Equal Remuneration, and ILO Convention 111 on Discrimination.</p>

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
<p>2.2 Workers, directly and indirectly employed on the farm, and sharecroppers, are adequately informed and trained for their tasks and are aware of their rights and duties.</p>	<p>2.2.3 Adequate and appropriate training and comprehensible instructions on fundamental rights at work, health and safety, and any necessary guidance or supervision are provided to all workers.</p> <p>Note for 2.2.3: In case of Group Certification of smallholders, periodical training sessions for workers may be organized by group managers at group level.</p>	<p>Guidance 2.2.3 If there are no regulations regarding frequency of health and safety-related training sessions, health and safety training shall be carried out at least on a yearly basis.</p>	<p><i>Suggest expanding 2.2. to include the following aspects in scope: A training plan is established, to ensure that all legally required training is kept up to date and that all relevant farmers and workers are trained within 2 years of the first assessment.</i></p> <p><i>Training records are kept with the trainee information disaggregated by gender.</i></p> <p><i>Suggest specifying the following topics, where if relevant, training be provided: Handling, storage and disposal of crop protection products; Health and safety of working around biodigestors, manure pits, effluent ponds; Fertilizers choice, source, application rate and placement (based on soil and crop characteristics); Risks of soil loss and degradation Halting deforestation, biodiversity loss and ecosystem services; Energy and water scarcity (energy efficiency, sustainable irrigation systems, etc); Waste minimization, segregation, storage and on-farm disposal.</i></p>	<p>WG approved a rephrasing of GUIDANCE 2.2.3 to reflect the comments made, also regarding time and periodicity required for trainings (currently: "yearly basis").</p>	<p><b>Guidance 2.2.3</b> If there are no regulations regarding frequency of health and safety-related training sessions, health and safety training shall be carried out at least on a yearly basis.</p> <p><b>These are some ideas where training (if of relevance) should be provided by the producer:</b></p> <ul style="list-style-type: none"> <li>• Handling, storage and disposal of crop protection products</li> <li>• Health and safety of working around biodigestors, manure pits, effluent ponds</li> <li>• Fertilizers choice, source, application rate and placement (based on soil and crop characteristics)</li> <li>• Risks of soil loss and degradation</li> <li>• Halting deforestation, biodiversity loss and ecosystem services</li> <li>• Energy and water scarcity (energy efficiency, sustainable irrigation systems, etc)</li> <li>• Waste minimization, segregation, storage and on-farm disposal.</li> </ul> <p>A training plan is established, to ensure that all legally required training is kept up to date and that all relevant farmers and workers are trained within 2 years of the first assessment. Training records are kept with the trainee information disaggregated by gender.</p>



CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
2.3 A safe and healthy workplace is provided for all workers.	2.3.2 Relevant health and safety risks are identified, procedures are developed to address these risks by employers, and these are monitored.		<i>We suggest adding the following to this requirement, as workers are often the ones to notice irregularities, health and safety risks and opportunities: "Workers or worker representatives (e.g. unions and/or women's groups) must be involved in identifying safety and security risks and setting priorities for action"</i>	WG agreed on adding phrase to GUIDANCE 2.3.2: "Workers or worker representatives (e.g. unions and/or women's groups) should be involved in identifying safety and security risks and setting priorities for action"	<b>Guidance 2.3.2 Workers or worker representatives (e.g. unions and/or women's groups) must be involved in identifying safety and security risks and setting priorities for action.</b>
	2.3.5 There are mechanisms in place that make sure that workers follow the safety requirements.		<i>Similarly, procedures or policies should be required to be in place for previous reqs above as well.</i>	WG voted to not address the comments and leave the indicator as it is.	No change
	2.3.6 Accident and emergency procedures exist and instructions are clearly understood by all workers.	Guidance 2.3.6 Accident and emergency procedures should include taking immediate steps to stop any operation where there is imminent and serious danger to safety and health, and to evacuate as appropriate.	<i>Is there trained personnel (if so trained by who and to what standard) Is there an evacuation process or series injuries</i>	Members agree to take the comment into account and add that workers are trained on this matter by a capable professional, to the guidance.	Guidance 2.3.6 Accident and emergency procedures should include taking immediate steps to stop any operation where there is imminent and serious danger to safety and health, and to evacuate as appropriate. <b>Workers are trained on this matter by a capable professional.</b>
	2.3.7 In case of accidents or illness, access to first aid and medical assistance is provided without delay.		<i>Is there a routine for workers to follow in case of accident or need for first aid? Does it get recorded?</i>	WG considered that this question is already covered in 2.2.3)	No change
			<i>Could we add an indicator like: "Producers are required to provide compensation for occupational injuries (or as minimum legal requirements of the correspondent countries)."</i>	Comment was discussed, members alleged legal compliance. But no proposal for change was forwarded by the WG.	Not included

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)	
2.5 Remuneration at least equal to national legislation and sector agreements is received by all workers directly or indirectly employed on the farm.	2.5.1 Gross wages that comply with national legislation and sector agreements are paid at least monthly to workers.	Guidance 2.5 'Workers indirectly employed on the farm' refers here to employees of service providers who carry out services directly related to the production process. The scope of 'services directly related to the production process' will be defined by national interpretations.	<i>Problem: Producer organizations should receive a living wage - reference could be made to the Global Living Wage Coalition and Benchmark (Anker method). Suggestion: Please introduce a criterion to calculate a living wage benchmark and work towards it</i>  <i>What occurs if work is based on piece rate and they only get paid for completion of this work?</i>	The issue of living wage/living income was discussed in the WG, but it was considered as complex issue that needs further analysis and therefore no changes were suggested for this revision.	No change	
	2.5.2 Deductions from wages for disciplinary purposes are not made, unless legally permitted. Wages and benefits are detailed and clear to workers, and workers are paid in a manner convenient to them. Wages paid are recorded by the employer.			<i>Any insurance protection for workers (accident or injury)?  Permanent or temporary workers?</i>	There was consensus in the WG to add the following phrase as GUIDANCE to 2.5.2: "The criterion applies to permanent and temporary workers"	<b>New guidance 2.5.2</b> The criterion applies to permanent and seasonal workers involved in soy production.
	2.5.5 Working hours per worker are recorded by the employer	Guidance 2.5.5-2.5.6 Reference ILO Convention 1 on Hours of Work.	<i>Problem: Workers' shift hours are logged by the employer. I suggest that the Punch Clock card used by auditors as proof only be mandatory for farms with more than 10 Employees, as required by Brazilian Law.  It is very hard for indirect workers to have the hours recorded, especially in Argentina with contractors</i>	The members of the WG were split in the opinions: mainly Brazilian representatives considered this a legal requirement, but Argentinian stakeholders appointed to the difficulty to make this happen, therefore a text revision was made to reflect the reality.	<b>Indicator 2.5.5</b> Working hours of direct employees are recorded by the employer. In case of indirect workers, efforts must be undertaken to obtain lawful working hour records.	
	2.5.9 Potable water is supplied to all employees inside the farm. If employees live on the farm, they additionally have access to affordable and adequate housing and food. If charges are made for these, such charges are in accordance with market conditions. The living quarters are safe and have at least basic sanitation			<i>Suggest adding "access to bathrooms and hand washing".  Could we add an indicator like: "Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers."</i>	There was agreement to rephrase the indicator to include the first comment, the second comment was considered being already reflected.	<b>Indicator 2.5.9</b> Potable water is supplied to all employees inside the farm. If employees live on the farm, they additionally have access to <b>bathrooms and hand washing</b> and affordable and adequate housing and food. If charges are made for these, such charges are in accordance with market conditions. The living quarters are clean, safe, have basic sanitation and meet the needs of the workers.

## Summary of revisions in round 1 – PRINCIPLE 3: Responsible Community Relations

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
3.1 Channels are available for communication and dialogue with the local community on topics related to the activities of the soy farming operation and its impacts.		<p>Guidance 3.1 Communication channels need to use local languages and appropriate means (e.g. Internet is not an appropriate mechanism for communication with communities that have no access to it). Communication requirements must be adequate for identifying any disputes with traditional land users as referred to in Criterion 3.2 Where people on or adjacent to the property are demonstrated to be illegal (e.g. squatters), producers should try to engage in communication, but they are not obliged to maintain a dialogue. Local communities may be represented by legitimate representatives in communication or negotiation or in audit situations. Where this is the case, this does not exempt the producer or the auditor from the responsibility of communicating with other members of the community, especially groups such as the poor, illiterate, youth, women or indigenous groups. It is important to include interviews with members of the community to evaluate the existence of the communication channels and their appropriateness.</p>	<p><i>Suggest adding “and other historically disenfranchised groups in that locality” when describing local community groups to engage.</i></p> <p><i>“Evidence of compliance with this indicator may be notifications submitted to neighbors and adjacent local communities. Examples of communication channels may be (but...”</i></p>	It was agreed to rephrase the indicator and include the comments in a revised guidance text.	<p><b>Criterion 3.1</b> Channels (<b>complaint and grievance</b>) are available for communication and dialogue with the local community on topics related to the activities of the soy farming operation and its impacts.</p> <p><b>Guidance 3.1</b> Communication channels need to use local languages and appropriate means (e.g. Internet is not an appropriate mechanism for communication with communities that have no access to it). Communication requirements must be adequate for identifying any disputes with traditional land users as referred to in Criterion 3.2. Where people on or adjacent to the property are demonstrated to be illegal (e.g. squatters), producers should try to engage in communication, but they are not obliged to maintain a dialogue. Local <b>communities and other disenfranchised groups</b> may be represented by legitimate representatives in communication or negotiation or in audit situations. Where this is the case, this does not exempt the producer or the auditor from the responsibility of communicating with other members of the community, especially groups such as the poor, illiterate, youth, women or indigenous groups. <b>Evidence of compliance with this indicator may be notifications submitted to neighbors and adjacent local communities.</b> It is important to include interviews with members of the community to evaluate the existence of the communication channels and their appropriateness.</p>
	3.1.1 Documented evidence of communication channels and dialogue is available.	<p>Guidance 3.1.1 In the case of small farms, documented evidence is not required and is replaced by verbal evidence.</p>	<i>How often do Producers need to send communications to the local community mentioning the communication channels?</i>	<p>WG agreed that the case of small farms, documented evidence is not required and is replaced by verbal evidence. It was also discussed to include guidance on frequency of the communication which will depend on the level of criticality of the issues.</p>	<p><b>Indicator 3.1.1</b> Documented evidence of communication channels and dialogue is available. <b>The channels adequately enable communication between the producer and the community.</b></p> <p><b>Guidance 3.1.1</b> <b>Communication should happen in dependence with the relevance of the issue. Critical issues require a systematic communication, while non-critical issues require a reactive communication. In the case of small farms, documented evidence is not required and is replaced by verbal evidence.</b></p>

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)	
3.2 In areas with traditional land users, conflicting land uses are avoided or resolved.		<p>Guidance 3.2</p> <p>When applying for certification, producers will identify local communities and traditional land users. Traditional land users will provide reasonable proof that they have been exercising use or access rights on the property area or on ecosystem services derived from the area over the last ten years, prior to May 2009. In the case of traditional indigenous communities, Articles 14-18 of ILO Convention 169 also apply.</p> <p>Traditional land users may be represented by legitimate representatives in communication, negotiation or audit situations. Where this is the case, this does not exempt producers or auditors from the responsibility of communicating with other members of the community.</p>	<p><i>The requirement for local communities to present proof that they have been exercising use or access rights on the property area or on ecosystem services over the last ten years, prior to May 2009 may be very challenging.</i></p> <p><i>What is the guidance for 'reasonable proof'?</i></p>		<p>Guidance 3.2</p> <p>When applying for certification, producers will identify local communities and traditional land users. Traditional land users will provide reasonable proof that they have been exercising use or access rights on the property area or on ecosystem services derived from the area over the last ten years, prior to May 2009.</p> <p><b>Reasonable proof may rely on specific criteria, such as, official document/branded, recognized by the personnel and leadership, valid/updated, direct relation with its purpose.</b></p> <p>In the case of traditional indigenous communities, Articles 14-18 of ILO Convention 169 also apply.</p> <p>Traditional land users may be represented by legitimate representatives in communication, negotiation or audit situations. Where this is the case, this does not exempt producers or auditors from the responsibility of communicating with other members of the community.</p>	
	3.2.4 Sites of special cultural, ecological, economic or religious significance and resources fundamental for satisfying the basic necessities of local communities and indigenous people (for livelihoods, health, nutrition, water, etc.) shall be clearly identified in cooperation with such people and recognized and protected by farm managers.			<p><i>Communities are mentioned (do they also have rights equal or indigenous groups?</i></p>	<p>It was decided to rephrase the Indicator 3.2.4 by clarifying the term "communities".</p>	<p>3.2.4 Sites of special cultural, ecological, economic or religious significance and resources fundamental for satisfying the basic necessities of <b>all traditional communities</b>, local communities and indigenous people (for livelihoods, health, nutrition, water, etc.) shall be clearly identified in cooperation with such people and recognized and protected by farm managers.</p>
	3.3.1 The complaints and grievances channel has been made known and is accessible to the communities and employees.	Guidance 3.3	Interviews with members of local communities are important in verifying compliance with this Criterion.	<p><i>Could we add an indicator that says: "Producers are required to address grievances related to working conditions and workers' rights"</i></p>	<p>The WG alleged that the same guidance os already included in the guidance to 3.1, therefore the indicator was merged an the guidance deleted.</p>	<p><b>Indicator merged into 3.1 and 3.1.1</b></p> <p><b>Guidance to delete as same guidance is already given in 3.1</b></p>

## Summary of revisions in round 1 – PRINCIPLE 4: Environmental Responsibility

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
4.1 On and off site social and environmental impacts have been assessed and appropriate measures taken to minimize and mitigate any negative impacts.		<p>Guidance 4.1</p> <p>The assessment should be appropriate to the scale of the operation.</p> <p>In case of group certification of small producers, different groups located in similar areas and having similar issues may exchange information in order to prepare and/or carry out the assessment, however, reports shall be prepared at group level.</p> <p>Where there are national requirements for impact assessments, which are adequate for meeting this Criterion (identified by the NTG), these shall be followed. Where there are no national requirements, auditors shall verify whether an adequate process has been followed (for instance “The Equator Principles’ Social and Environmental Assessment Procedure”.</p>	<p><i>Criteria for selecting indicators;</i></p> <p><i>The minimum set of qualifications that the person who conducted the study must have;</i></p> <p><i>What the summary must contain;</i></p> <p><i>Set targets for the issues raised.</i></p>	The WG discussed the comments and came to the conclusion that the comments talk about details which are given in the following indicators, therefore no change was suggested.	No change
	4.1.1 An initial social and environmental assessment is carried out prior to the first certification audit 1 (see also Indicator 1.3.1).	<p>Guidance 4.1.1</p> <p>Endemic, rare, threatened or endangered species shall be identified in this assessment (see also Indicator 4.5.3).</p>	<p><i>What assessment is used?</i></p>		No change
	4.1.2 The assessment is carried out by someone who is adequately trained and experienced for this task.		<p><i>Problem: The assessment should not only be carried out by someone who is adequately trained and experienced, but who is also independent of the company/farm that is assessed.</i></p> <p><i>Suggestion: It is good if RTRS carries out regular meta-analysis of the quality of its assessments/audits, and develops extra measures to assurance independence.</i></p>		No change
	4.1.3 The assessment is carried out in a comprehensive and transparent manner				No change

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
4.2 Pollution is minimized and production waste is managed responsibly. Note: Chemical use and disposal is dealt with under Principle 5.	4.2.1 There is no burning on any part of the property of crop residues, waste, or as part of vegetation clearance, except under one of the following conditions: a) where there is a legal obligation to burn as a sanitary measure; b) where it is used for generation of energy including charcoal production and for drying crops; c) where only small-caliber residual vegetation from land clearing remains after all useable material has been removed for other uses.		<p><i>Problem: Open fire, for any kind of vegetation clearing, chair coal production and/or drying of crops should be eliminated, especially of unfit fuels/combustibles. This is hazardous both as a feed/food safety issues (dioxins from low temperature waste burning) and greenhouse gas emissions.</i></p> <p><i>We recommend expanding 4.2.2. by adding a new indicator for the storage and disposal of hazardous waste.</i></p> <p><i>- If there are national regulations for the safe storage and disposal of different types of hazardous waste, these shall be complied with. If there are no regulatory requirements, then guidance on the best available options available must be sought, and advice taken.</i></p> <p><i>- All on-farm landfills and discharge to drains, sewers, land or groundwater (including cesspits, soakaways, septic tanks and pit latrines) must be listed. Associated risks to human and environmental safety must be assessed, and actions undertaken to improve the situation where significant risks exist.</i></p> <p><i>- All on-farm waste disposal and composting areas (e.g. for domestic waste) must be at a safe distance from living areas and/or waterways.</i></p> <p><i>- Toilets on the farm must never discharge, directly or indirectly into surface water. All sanitary landfills on the farm must have been designed and managed according to the requirements of applicable national legislation OR, in the absence of legislation, in accordance with the Guidance provided.</i></p> <p><i>- Measures must be in place to ensure that the farm is clean and tidy. Plastic waste and other litter must not be left in fields, field margins, around the farm or on roadsides. Farmers and workers must not throw litter and other general waste into ditches, stream- ways or holes that might flood (and thereby give rise to ground- or surface-water flow-blockage or contamination), but dispose of litter responsibly.</i></p> <p><i>- All waste-disposal contractors and service used must have the appropriate legal approvals to handle the types of waste involved. If no legal approval system is in place locally, large farms and Unilever suppliers (on behalf of their farmers) must take steps to assure themselves that waste management contractors to small- scale farms do not dispose of the waste illegally or in ways that are socially and environmentally damaging.</i></p>	<p>WG agreed to provide more guidance as suggested and also to add a definition to the Glossary on "appropriate fuel".</p> <p>Furthermore, guidance on recycling was included in order to ask for justifications.</p>	<p>Indicator 4.2.1 - There is no <b>intentional</b> burning on any part of the property of crop residues, waste, or as part of vegetation clearance, <del>except under one of the following conditions: a) where there is a legal obligation to burn as a sanitary measure; b) where it is used for drying crops, generation of energy including charcoal production and for drying crops ; c) where only small-caliber residual vegetation from land clearing remains after all useable material has been removed for other uses.</del></p> <p><b>New Guidance 4.2.1</b></p> <p>There are three exceptions to this rule:</p> <ol style="list-style-type: none"> <li>where there is a legal obligation to burn as a sanitary measure;</li> <li>where it is used as fuel for drying crops;</li> <li>counter fires to fight a fire are allowed.</li> </ol>
	4.2.2 There is adequate storage and disposal of fuel, batteries, tires, lubricants, sewage and other waste.	4.2.4 Re-use and recycling are utilized wherever possible			

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
4.3 Efforts are made to reduce emissions and increase sequestration of Greenhouse Gases (GHGs) on the farm.			<p><i>Public.Consultation</i></p> <p><i>We recommend expanding the scope of this requirement to include an indicator on energy management, as this can be an important contributor to on-farm GHG emissions. The new indicator could be as follows:</i></p> <p><i>An energy management plan must be in place, designed to reduce energy consumption and improve energy efficiency. The plan must address energy use for the following activities:</i></p> <ul style="list-style-type: none"> <li>- Cultivation</li> <li>- Storage</li> <li>- Transportation</li> </ul> <p><i>Opportunities to reduce energy use include:</i></p> <ul style="list-style-type: none"> <li>- Scheduling harvest and the delivery of raw materials</li> <li>- Local sourcing of input materials and labour</li> <li>- Installation of and/or access to renewable energy systems</li> </ul> <p><i>Problem: 'Efforts' is still quite weak wording and consider to make the wording more strong in terms of requirements. Interesting to explore in how far this can be linked to an incentive or reward.</i></p> <p><i>Suggestion: Best-practice producers could be supported through new modules in certification to overcome the barriers they are facing (e.g. lack of finance) to adopt agroecological practices. Producers could for example be rewarded for reducing their inputs (moving towards organic) or for carbon fixation.</i></p>	The WG discussed if this eventually becomes a new indicator but opted in adding a guidance to this point to make the carbon reduction goal more tangible.	<b>New Guidance 4.3:</b> The producer must establish a plan that shows how he will fulfil this criterion. The plan must show which targets (% reduction until when) he has set for which areas and what measures he will take to reach his target.
	4.3.1 Total direct fossil fuel use over time is recorded, and its volume per hectare and per unit of product for all activities related to soy production is monitored.	Guidance 4.3.1 With farms which produce multiple crops, an estimate of the use of fossil fuel for soy production should be made. Activities related to soy production include: field operations and on-farm transportation, whether this is supplied by producers or by third parties.	<i>We suggest expanding the scope of this indicator from fossil fuel use to calculating the total on-farm greenhouse gas footprint, which would account for emissions associated with different types of nutrient in use, energy, irrigation, land use change and transport. We recommend RTRS endorse the Cool Farm Tool as a suitable calculator for this, because it is globally relevant to soy and corn, has active working groups and membership to fund and apply the latent science, is easy to use and provides farmers with useful insights to understand what activities are significant drivers of their footprint. These footprints can also be shared by producers with their suppliers and in turn to customers, should all parties permit such data sharing.</i>	It was considered that this issue was not in the scope of the WG but has been treated in relation with the "Cool Farm"-tool	No change

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
4.3 Efforts are made to reduce emissions and increase sequestration of Greenhouse Gases (GHGs) on the farm.	4.3.4 Opportunities for increasing carbon sequestration through restoration of native vegetation, forest plantations and other means are identified and, when possible, implemented.	Guidance 4.3.4 If producers cannot apply the identified opportunities for increasing carbon sequestration, a justification shall be given to the auditor.	<i>If producers cannot apply the identified opportunities for increasing carbon sequestration, a justification shall be given to the auditor. What kind of justification would be sufficient? It relates to the restoration of native vegetation, forest plantations and other means, so it is quite important and is often even a legal requirement. This criterion could be more ambitious.</i>  <i>Is this identification of possibilities for carbon sequestration completed during the Environmental and social assessment? (What is the proportion of RTRS farms who implement after identifying opps.?)</i>	WG confirmed necessity of strengthening the indicator by providing more guidance as indicated at right.	Guidance 4.3.4 If producers cannot apply the identified opportunities for increasing carbon sequestration, a justification shall be given to the auditor. <b>Other means may include:</b> <ul style="list-style-type: none"> <li>• <b>Passively restore roadsides and fences</b></li> <li>• <b>Establish forest plantations</b></li> <li>• <b>Cover crops in degraded non-productive areas, as well as in floodplains or lowlands.</b></li> <li>• <b>Conservation of non-native plantations that were previously used as shades for livestock</b></li> </ul>
4.4 Expansion of soy cultivation is responsible.		Guidance 4.4 for Certification Bodies Data capture requirements for future Payment for Environmental Services (PES) schemes: the date of registration of the producer for certification purposes is recorded by the Certification Body. During the certification audit, the area and type of vegetation of all voluntary reserves of native vegetation (above the legal requirement) are recorded. Following certification, details of the date of registration for certification purposes and the area and type of vegetation of voluntary reserves are added to an RTRS register. When an RTRS PES scheme is developed, payments are available retroactively to the date of registration.	<i>Problem: Considering the growing need for actual knowledge about when certain grounds have been taken into production (cut-off date issues, LULUC &lt;&gt; CFP) it is necessary to map not alone all non-converted natural land (reserve or of natural importance) but also 'to map and register (including date of conversion) of all arable land and pastures on a farm.</i>  <i>Problem: It would be clearer if the current (2) cut-off dates are combined in 1 indicator. Or, better still: the earlier date would be dropped and replaced by the 2016 date. As a (voluntary) indicator the proposed indicator 4.4.2. (see below) might be considered. This way it is clear to see what cut-off date applies to ALL RTRS-certified farms and those which have an even longer track record of no-conversion would be able to show this also.</i>  <i>Suggestion: 4.4.1. After 3rd June 2016, no conversion is allowed in any natural land (see Glossary), steep slopes and in areas designated by law to serve the purpose of native conservation and/or cultural and social protection.</i> <i>4.4.2 [voluntary indicator] In case farm has not converted any natural land prior to 3rd of June 2016, the date of the last known conversion may be included by the auditor in the farm's audit report.</i>	No follow-up to submitted comment by WG. It was recommended not touch in cut-off dates. To mix/merge both indicators could bring more doubt to the certified producers. Mostly of the comments refer to additional explanation. But it was recommended to refer to the Accountability Framework at that stage.	<b>New Guidance 4.4</b> <b>The Accountability Framework definitions are recognized for the applicability of this criterion.</b>



CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
4.4 Expansion of soy cultivation is responsible.	<p>4.4.1 The following areas have not been cleared or converted from May 2009 onwards:</p> <p>4.4.1.a Where RTRS maps are available: All areas included in Category 1 of the maps 3(reference).</p> <p>4.4.1.b Where RTRS maps are not available the following areas: a) native forest, b) Riparian vegetation, c) natural wetlands, d) steep slopes, e) areas designated by law to serve the purpose of native conservation and/or cultural and social protection.</p> <p>4.4.1.c Where there is an unresolved land use claim by traditional land users under litigation, without any agreement from both parties.</p> <p>4.4.2 After 3rd June 2016, no conversion is allowed in any natural land (see Glossary), steep slopes and in areas designated by law to serve the purpose of native conservation and/or cultural and social protection.</p>	<p>Guidance 4.4.1.c Traditional land users will provide reasonable proof that they have been exercising use or access rights on the area of the property over the last 10 years prior to May 2009.</p>	<p><i>Good to note that after June 2016 no conversion of land is allowed (definition of native lands is very broad) will this align with the accountability framework definition of natural ecosystems?</i></p> <p><i>Protection and conservation areas (should be defined) protection is more about soil loss/erosion and water management (protection of watersheds).</i></p> <p><i>Problem: There are some land conservation techniques that require minimum land transformation. In this case, this principle doesn't allow any transformation in order to preserve land from hydrological erosion, for example.</i></p> <p><i>Suggestion: For minimum transformation cases, evaluate impacts, consider case by case scenario</i></p>	<p>The WG has intensively discussed the issues and a new indicator has been suggested during the WG-discussion. It has been broadly discussed. It has been submitted to a subgroup which has debated the issue during separate sessions.</p> <p>A final suggestion has been introduced to be submitted to the Board at the second public consultation (see in red on this page)&gt;</p>	<p><i>New indicator 4.4.3 suggested: In cases where there were minimal level of deforestation or conversion after the corresponding cut-off dates – accounting for 5% of the total size of the farm or less, but no more than 50 hectares, whichever is stricter - the producer shall have in place and effectively implemented a restoration plan at the moment of the initial audit</i></p> <p><i>a) In case of conversion for infrastructure purposes: restore the same number of hectares as converted in areas with environmental gains (e.g. in biological corridors). If the mentioned areas are not available for restoration, the producer must restore 20% more hectares than what was originally converted, in a suitable area (refer to the guideline)</i></p> <p><i>b) Converted areas where the vegetation has been cleared for agricultural production have to be restored in the exact same place.</i></p>
			<p><i>Guidance 4.4.3 The restoration plan will be crucial to the establishment of short-, medium- and long-term objectives and it shall be completed in accordance with the terms set forth in the plan. The auditor must be able to verify that the primary species from the correspondent biome are thriving. The plan must be developed by a professional with the necessary skills, such as an agronomist or forest engineer, and the producer shall take photographic samples that show the evolution of the restoration process.</i></p> <p><i>The restoration must be carried out in a suitable area, meaning an environment similar to the converted environment, with similar topography and environmental and soil characteristics. Likewise, the community of species in the converted ecosystem must be respected and efforts must be made to restore it.</i></p> <p><i>If conversion took place due to a legal requirement (national or local requirement) or verifiable emergency (such as firewalls), the restoration plan will not be required.</i></p> <p><i>In no case will it be accepted that the converted area be subsequently used for agricultural crop production.</i></p> <p><i>Minimal levels of deforestation or conversion at the site scale do not necessarily violate no-deforestation or no-conversion commitments. However, this provision does not sanction substantial conversion of forests or natural ecosystems to enlarge commodity production areas.</i></p> <p><i>To be considered consistent with no-deforestation or no-conversion commitments, minimal levels must generally meet the following conditions:</i></p> <ul style="list-style-type: none"> <li><i>• Not exceed cumulative thresholds that are small both in absolute terms (e.g., no more than a few hectares) and relative to the area in question (e.g., no more than a small proportion of the site). Levels of conversion or deforestation should be assessed cumulatively over space and time; multiple small instances of conversion may lead to a producer being considered non-compliant with commitments.</i></li> <li><i>• Not result in the loss of important biological, social, or cultural values, for instance as defined by the High Conservation Value framework.</i></li> <li><i>• If planned in advance, be specified as a result of an integrated and participatory landuse planning process that follows good practices for achieving positive environmental and social outcomes (e.g., as specified in Core Principle 7).</i></li> <li><i>• If not planned in advance (e.g., if resulting from unauthorised encroachment or other unforeseen activities), are addressed through effective actions to prevent repetition and to remediate harms and restore lost conservation values to the extent necessary</i></li> </ul>		

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
4.5 On-farm biodiversity is maintained and safeguarded through the preservation of native vegetation.	4.5.1 There is a map of the farm, which shows the native vegetation, production areas and water courses (see 5.2.1).	<p>Guidance 4.5.1</p> <p>The map and plan should be appropriate to the size of the operation.</p> <p>For group certification the group manager may maintain the map centrally and may be responsible for maintaining and developing a plan for conservation.</p>	<p><i>We suggested adding to the scope of 4.5.1 the following:</i></p> <p><i>The plan must assess the presence or absence of (i) rare, threatened or endangered species and habitats, (ii) parts of the landscape of High Conservation, (iii) parts of the landscape with value for biodiversity and (iv) parts of the landscape providing valued ecosystem services. The presence of any known wildlife corridors within the landscape shall be included in the documentation/map.</i></p> <p><i>The BAP must include a list of actions that farmers can take to support biodiversity. These must be related to the local biodiversity priorities, and issues on which farming has direct or indirect influence. These can include discussions with NGOs and governments or priorities, and awareness-raising and training in the first year, but must thereafter move to pilot scale and actions on every farm.</i></p> <p><i>Progress over time must be shown, preferably by setting measurable goals on monitoring programme towards them.</i></p> <p><i>The plan should list the following areas as potential topics on which to focus actions:</i></p> <ul style="list-style-type: none"> <li>- Conservation of rare species and/or habitats</li> <li>- Enhancing local high conservation values</li> <li>- Development, maintenance, or improvement of wildlife corridors</li> <li>- Enhancement of ecosystem service provision by the farmed landscape</li> <li>- General landscape improvements for wildlife</li> <li>- Work to eliminate alien and/or invasive species</li> <li>- Conserving genetic diversity of crops or animals</li> </ul>	<p>The WG discussed to include great part of the suggested comments in a guidance. But it was agreed that the indicator is simple and objective and that adding the details makes it complex without adding value to the indicator, therefore no change was suggested after debating the points.</p>	No change

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)	
4.5 On-farm biodiversity is maintained and safeguarded through the preservation of native vegetation.	4.5.2 There is a plan, which is being implemented and monitored to ensure that the native vegetation and wildlife are being maintained.	Guidance 4.5.2 The plan needs to include at least the following: <ul style="list-style-type: none"> <li>• identification of on-farm native vegetation and wildlife;</li> <li>• indicators and baseline of the status of native vegetation and wildlife;</li> <li>• measures to preserve native vegetation and wildlife;</li> <li>• monitoring. Annex 5 provides an example of how a plan could be developed for this Indicator.</li> </ul>	<i>Is there requirements for the development of a biodiversity management plan? Can plans be developed by producer or is trained 3rd party required?</i>	WG accepted to add the requirement of trained personnel to carry out the plan in the guidance.	Guidance 4.5.2 The plan needs to include at least the following: <ul style="list-style-type: none"> <li>• identification of on-farm native vegetation and wildlife;</li> <li>• indicators and baseline of the status of native vegetation and wildlife;</li> <li>• measures to preserve native vegetation and wildlife;</li> <li>• monitoring. Annex 5 provides an example of how a plan could be developed for this Indicator.</li> </ul> <p>The plan is carried out by someone who is adequately trained and experienced for this task. (as 4.1.2). To corroborate this, said person will show attendance to courses, training, and experience through their CV.</p>	
	4.5.3 Rare, threatened or endangered species permanently or temporary present at the property are protected. Hunting or collecting of these species is not allowed.			<i>How can these be determined without a HCV over all categories 1-4?</i>  <i>Suggest starting with "Endemic, rare..." to parallel language in 4.1.1</i>	Language change was accepted, WG did not enter in the discussion of HCV.	Indicator 4.5.3 <b>Endemic</b> , rare, threatened or endangered species permanently or temporary present at the property are protected. Hunting or collecting of these species is not allowed.
	4.5.4 For farms that have less than 10% of native vegetation (but in compliance with 4.4 and 5.2 and other related indicators), producers are required to implement and promote conservation activities in, out or around the farm, in order to promote wildlife and restoration of native vegetation.	Guidance 4.5.4 Activities that could be carried out by producers to comply with this indicator are (but are not limited to) as follows: leaving corridors or restoring borders of fences or paths, restoring degraded or unproductive areas, supporting conservation or restoration activities outside the boundaries of the farm (but related to local wildlife and native vegetation). This support may be given through funding or through the supply of resources, materials, personnel, etc. Producers may set up groups to comply with this indicator. Producers may organize activities together in order to promote conservation activities inside, outside or around the farm.		<i>Review how this point is fulfilled to make it more objective and clear. It should be better specified what "conservation activities" refers to. They would be good possible and logical examples.</i>	It was suggested to change the wording in the indicator to: "..activities <b>inside</b> , <b>outside</b> or around the farm, <del>in order to</del> promote wildlife and <b>the</b> restoration of native vegetation."  An amendment of the Guidance was suggest as presented at right	Guidance 4.5.4 Activities that could be carried out by producers to comply with this indicator are (but are not limited to) <del>as follows</del> : <ul style="list-style-type: none"> <li>• leaving <b>biological</b> corridors or restoring borders of fences or paths,</li> <li>• restoring degraded or unproductive areas,</li> <li>• supporting conservation or restoration activities outside the boundaries of the farm (but related to local wildlife and native vegetation) – e.g. <b>creation of forest seedlings nurseries for subsequent donation to those organizations working in the establishment of species, collaboration with institutions devoted to conservation activities.</b></li> </ul> <p>This support may be <del>given</del> <b>provided</b> through funding or through the supply of resources, materials, personnel, etc. Producers may <del>set up form</del> groups to comply with this indicator. Producers may organize <b>joint</b> activities <del>together in order</del> to promote conservation activities inside, outside or around the farms.</p>

## Summary of revisions in round 1 – PRINCIPLE 5: Good Agricultural Practices

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
5.1 The quality and supply of surface and ground water is maintained or improved.	5.1.1 Good agricultural practices are implemented to minimize diffuse and localized impacts on surface and ground water quality from chemical residues, fertilizers, erosion or other sources, and to promote aquifer recharge.		<p><i>Consider adding "assessment of water risk" to the standard.</i></p> <p><i>Does the requirement to minimize diffuse and localized impacts on surface and ground water quality from chemical residues, fertilizers, erosion and other sources apply to the area around the farm? This is relevant for surrounding communities.</i></p>	WG considered not to change the indicator, as the indicators below enter into the issue.	No change
	5.1.2 There is a plan that includes monitoring and mitigation measures according to risks that have been identified and it is applicable to the scale.	Guidance 5.1.2 Where appropriate there should be monitoring of parameters such as pH, temperature, dissolved oxygen, turbidity and electrical conductivity. Monitoring should be considered at watershed level. Where there are wells, these should be used for monitoring ground water.	<i>How are risks identified?</i>	Agreed to improve the guidance with more details on the monitoring plan.	Guidance 5.1.2 <del>Where appropriate there should be monitoring of.</del> <b>The monitoring plan has to define</b> parameters such as pH, temperature, dissolved oxygen, turbidity, electrical conductivity, <b>contamination levels and as well as the adequate frequency of test.</b> Monitoring should be considered at watershed level. Where there are wells, these should be used for monitoring ground water. <b>The testing laboratory must be independent, but not necessarily certified.</b>
	5.1.3 Any direct evidence of localized contamination of ground or surface water is reported to, and monitored in collaboration with local authorities.		<i>How do they monitor risk (national or international guidelines and requirements)?</i>	WG discussed the different patterns used but decided not to change the indicator.	No change

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
5.1 The quality and supply of surface and ground water is maintained or improved.	5.1.4 Where irrigation is used, there is a documented procedure in place for applying best practices and acting according to legislation. Note: For group certification of small farms, where irrigation is used for crops other than soy, but is not done according to best practices, a plan is in place and is being implemented to improve practices. The group manager is responsible for documentation.	Guidance 5.1.4 When using irrigation, attention should be paid to other potential uses such as household use or use for other food crops, and, if there is lack of water, priority should be given to human consumption. For new irrigation systems, an environmental impact assessment is required.	<i>We recommend introducing an indicator or amending 5.1.4 (Where irrigation is used, there is a documented procedure in place for applying best practices and acting according to legislation and best practice guidance (where this exists), and for measurement of water utilization), to require that irrigation records be kept. We suggest the following scope: Irrigation records shall be kept showing at least: a) Time b) Date c) Land area irrigated d) Quantity of water used Equipment must be maintained and calibrated to ensure water is applied efficiently and sparingly.</i>	The WG opted to not change the current indicator and guidance as national regulation is referred to and followed.	No change
5.2 Natural vegetation areas around springs and along natural watercourses are maintained or re-established.	5.2.2 Where natural vegetation in riparian areas has been removed there is a plan with a timetable for restoration which is being implemented.		<i>Is this connected to the date of non-conversion (june 2016 or May 2009)?</i>	Cut-off dates are related to 4.4.1 & 4.4.2 not to be discussed in this indicator, guidance included.	<b>New guidance 4.2.2. This indicator applies the requirements of the criteria 4.4.</b>
5.3 Soil quality is maintained or improved and erosion is avoided by good management practices.			<i>We recommend introducing an indicator or amending 5.3 to require a soil management plan. We suggest the scope be as follows: There shall be a soil management and conservation plan implemented on every farm. The plan shall be prepared and/or informed by a competent individual or authority (e.g. a farmer educated to college level in agriculture, a professional agronomy advisor/ consultant or government or a research institution advice). The records of the soil management plan will be kept for at least 2 years.</i>	According to WG-members, a soil management plan is necessary, but the farms can do it by themselves.  Guidance for sampling was discussed in subgroup and included in 5.3.1	New guidance included in 5.3.1

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
5.3 Soil quality is maintained or improved and erosion is avoided by good management practices.	5.3.1 Appropriate monitoring of soil quality including taking soil fertility samples (soil organic matter) is in place.	Guidance 5.3.1 Identify appropriate indicators for monitoring, which need to be based on key issues according to production type and region. Any selected monitoring indicators should be straightforward and supply reliable information. Suggestions include: analysis of organic matter, total nitrogen (N) (total N can be estimated as 5% of organic matter), phosphorous (P), pH, electrical conductivity, measurement of surface residues (quality and quantity 30 days before the mean sowing date with a tolerance of +\ -10 days).	<p><i>Suggest adding how often is process control on lab data audited. Is there guidance for sampling (who and how is it tested).</i></p> <p><i>Chapter 5: Good Agricultural Practices, does not have any requirements relating to nutrient management. The monitoring of total nitrogen is only mentioned as a suggested indicator to monitor soil quality under 5.3.1.</i></p> <p><i>Nutrient use and application have crucial importance for sustainable agriculture. Overapplication or the indiscriminate use of nutrients can lead to pollution of water courses (a cause for significant harm to the Mississippi River and Gulf of Mexico in the Mid-West soy producing region, as an example) and substantially contributes to the greenhouse gas footprint of the farm operation. Moreover, this may also be detrimental to soil biology.</i></p> <p><i>We therefore strongly recommend the introduction of a new criteria on nutrient management combined with several sub-indicators, based on those included in Unilever's Sustainable Agriculture Code 2017</i></p> <p><i>Proposed Criteria</i></p> <p><i>There shall be a Nutrient Management Plan implemented on every farm. The plan shall be prepared and/or designed by a competent individual or authority, who may be part of the supplier agronomy team. The Nutrient Management Plan will include a requirement to keep records of nutrients applied for at least 2 years.</i></p> <p><i>Proposed Indicators:</i></p> <ul style="list-style-type: none"> <li><i>- The nutrient requirements of the crop or pasture must be understood at all stages of growth, and used to design the Nutrient Management Plan.</i></li> <li><i>- Soil conditions shall be used to adjust the application rates, as part of the Nutrient Management Plan. If different parts of the farm have different soils, nutrient management is expected to vary appropriately. Nutrient applications must be timed to avoid application during, or just before, periods of heavy rain, snow or frozen ground, cracked, waterlogged or compacted soils, as nutrients will not be retained in the soil under such conditions and both GHG emissions and N in runoff are considerably increased.</i></li> <li><i>- The nutrient content and availability of fertilisers, manures, composts, cover crops and crop residues used shall be recorded, tested and/or estimated, and the results used to inform the Nutrient Management Plan.</i></li> <li><i>- The Nutrient Management Plan must include a calculation of the amount of Nitrogen and Phosphorus to be applied in each year, taking into account all sources of nutrients applied and those available from the soil. The calculation must also include an assessment of the amount of nutrients removed from the crop or pasture by harvesting and/or grazing.</i></li> <li><i>- Nutrient sources that pose unacceptable risks to people, the environment or product quality shall be avoided. This can be achieved either by testing inputs for contaminants to ensure that levels are below tolerable limits OR by an assurance/investigation that shows the source of the material to be free from contamination.</i></li> <li><i>- Application equipment must be maintained in good working order and safe to use. It is cleaned after use. Application equipment (including fertigation) must deliver the desired flow rates and distribution patterns. Manual application of fertilizers shall achieve even distribution and correct placement of the fertilizer.</i></li> </ul>	Items were included in a revised guidance to five more details on the indicators and the soil management plan.	<p>Guidance 5.31 Identify appropriate <b>monitoring</b> indicators <del>for</del> <b>monitoring</b>, which need to be based on key issues according to production type and region. Any selected monitoring indicators should be straightforward and <del>supply</del> <b>provide</b> reliable information. Suggestions include: analysis of organic matter, total nitrogen (N) (total N can be estimated as 5% of organic matter), phosphorous (P), pH, electrical conductivity, measurement of surface residues (quality and quantity 30 days before the mean sowing date with a tolerance of +\ -10 days).</p> <p><b>The soil management plan shall contain at least the following information:</b></p> <ul style="list-style-type: none"> <li>• <b>Soil sampling</b></li> <li>• <b>Crop rotation plan, including rotation with grasses</b></li> <li>• <b>Cover crop plan</b></li> <li>• <b>Type, quality and timing of fertilization, where efforts are made to keep the existing fertilization levels to a minimum.</b></li> <li>• <b>Procedures to avoid soil compaction</b></li> <li>• <b>Tools to prevent erosion caused by wind and water.</b></li> </ul> <p><b>The plan will have a minimum term of one complete rotation and will be carried out by the Agronomist in charge.</b></p>

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
5.3 Soil quality is maintained or improved and erosion is avoided by good management practices.	5.3.2 Knowledge of techniques to maintain soil quality (physical, chemical and biological) is demonstrated and these techniques are implemented.	<p>Guidance 5.3.2</p> <p>Techniques for maintaining soil quality may include:</p> <ul style="list-style-type: none"> <li>• Conservation agriculture</li> <li>• Crop rotation</li> <li>• Balanced fertilization</li> </ul> <p>Techniques for controlling soil erosion may include:</p> <ul style="list-style-type: none"> <li>• Management of on-farm roads</li> <li>• Management of sloping areas</li> <li>• Maintenance of permanent soil cover</li> <li>• Zero tillage (no-till farming)</li> </ul>	<i>Mandatory zero tillage</i>	<p>Conclusion of the WG: Include phrase: at least 20% of the area or it should be explained why the figures is not higher. --&gt; research minimum of 20% or higher --&gt; specify in national interpretations</p> <p>The goal is to promote zero tillage.</p> <p>Indicator and guidance were adapted.</p>	<p>Indicator 5.3.2</p> <p>Knowledge of techniques to maintain soil quality (physical, chemical and biological) is demonstrated and these techniques are implemented.</p> <p><b>At least 20% should be zero tillage. Producers will have to justify the reason why they could not do zero tillage.</b></p> <p>Guidance 5.3.2</p> <p>Techniques for maintaining soil quality may include:</p> <ul style="list-style-type: none"> <li>• Conservation agriculture</li> <li>• Crop rotation</li> <li>• Balanced fertilization</li> </ul> <p>Techniques for controlling soil erosion may include:</p> <ul style="list-style-type: none"> <li>• Management of on-farm roads</li> <li>• Management of sloping areas</li> <li>• Maintenance of permanent soil cover</li> <li>• Zero tillage (no-till farming)</li> </ul> <p><b>Knowing that zero tillage is often not possible, RTRS motivates producers to move towards zero tillage.</b></p>
	5.3.3 Knowledge of techniques to control soil erosion is demonstrated and these techniques are appropriately implemented.			<i>Is there training available to gain this knowledge of good management techniques?</i>	No changes required for this comment, as it is a direct question and not a requirement to change the indicator
	5.3.4 A crop rotation plan shall be implemented to prevent soy from being planted immediately over soy and to promote a time gap on the same field. <i>During this gap, a second crop or pasture should be cultivated or, at least, land shall be left fallow or under cover vegetation for regeneration purposes. This plan shall consider adapting specific climate and agro-ecological regional conditions.</i>	<p><b>COMMENTS RECEIVED</b></p> <p><i>Problem: Coverage plants</i></p> <p><i>As for soil management and conservation, ideally this coverage proposal would be the rule, using any other plant that can provide nutrient cycling, preservation of natural enemies and nutrient cycling.</i></p> <p><i>This scenario will provide for a better growing environment in the short term, making producers less dependent on fertilizers and synthetic molecules.</i></p> <p><i>The option to leave the soil in fallow or allow the natural regeneration of the soil may be unfavored depending on the type of soil, region and rainfall, among other factors; in other words, in this scenario the producer may see the system recover more slowly, making him very much dependent on synthetic tools for a longer period of time (year).</i></p> <p><i>Problem: The indicator is not sufficiently ambitious in terms of diversity, crop rotation practices, intercropping. The indicator is not linked to the ICM plan.</i></p> <p><i>Suggestion: Consider to make this more concrete/ ambitious in terms of diversity, crop rotation practices, intercropping – also linked to the ICM plan (...this includes measures around prevention, e.g. crop rotation, choice of seed variety) so that it demonstrably contributes to improved soil quality, agro-biodiversity and a reduction of agrochemicals</i></p>			<p><b>CHANGES AFTER DISCUSSION to strengthen the indicator:</b></p> <p>Indicator 5.3.4</p> <p>A crop rotation plan shall be implemented to prevent soy from being planted immediately over soy and to promote a time gap on the same field.</p> <p><i>During this gap, a second crop or pasture should be cultivated or, at least, land shall be left fallow or under cover vegetation for regeneration purposes. This plan shall consider adapting to specific climate and agro-ecological regional conditions.</i></p> <p><b>New Guidance 5.3.4</b></p> <p><b>RTRS encourages producers to conduct crop rotation. In cases where it is not possible, producers will have to justify their decision.</b></p>

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
5.4 Negative environmental and health impacts of phytosanitary products are reduced by implementation of systematic, recognized Integrated Crop Management (ICM) techniques. Note: See Annex 6 for further information on ICM.	5.4.1 A plan for ICM is documented and implemented which addresses the use of prevention, and biological and other non- chemical or selective chemical controls. Note: For group certification of small producers - Monitoring of soil fertility and soil quality should be part of the internal control system and can be carried out on a sampling basis within the group.	Guidance 5.4 Take into account scale and context especially for small farms – this relates to both the level of ICM expected and the records maintained.	<i>Problem: The reduction target could be more concrete and is now not linked to an incentive or reward.</i> <i>Suggestion: Good that the plan for ICM should lead to a reduction of potentially harmful phytosanitary products over time; explore the possibility to make this more concrete in terms of reduction target and in terms of which products (e.g. the use of Glyphosate).</i> <i>Interesting to explore in how far this can be linked to an incentive or reward.</i>  <i>Could we add something like: "Producers are required to implement integrated pest management practices that minimize the use of pesticides".</i>	WG members argued that the soil management plan is setting the targets and not the standard itself. WG decided to leave indicator as it is.	No change
	5.4.2 There is an implemented plan that contains targets for reduction of potentially harmful phytosanitary products over time.	Guidance 5.4.2 Parameters that are monitored include the number of applications of phytosanitary products per crop cycle, volume of phytosanitary product used per hectare, and toxicological class of product. Levels of potential harmfulness of a phytosanitary product may be determined from its WHO class for the purposes of this Criterion. Where targets are not met, documented evidence is presented to justify this.		WG suggested to address an internal comment to include use of biological products.	Guidance 5.4.2 Parameters that are monitored include the number of applications of phytosanitary products per crop cycle, volume of phytosanitary product used per hectare, and toxicological class of product. Levels of potential harmfulness of a phytosanitary product may be determined from its WHO class for the purposes of this Criterion. Where targets are not met, documented evidence is presented to justify this. <b>Producers are encouraged to consider the use of biological products.</b>
	5.4.4 Use of agrochemical products follows legal requirements and professional recommendations (or, if professional recommendations are not available, manufacturer's recommendations) and includes rotation of active ingredients to prevent resistance.	Guidance 5.4 Take into account scale and context especially for small farms – this relates to both the level of ICM expected and the records maintained.	<i>Should be Materials safety data sheets (MSDS) for each chemical but this may differ for different countries.</i>	Add in guidance: producers should store the MSDS sheets where they handle the products.	Guidance 5.4.4 Both local and national legislation should be taken into account. <b>Producers should store the product safety sheets where they handle the products so that they have quick access to them, in case they need them.</b>



CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)	
5.5 All application of agrochemicals is documented and all handling, storage, collection and disposal of chemical waste and empty containers, is monitored to ensure compliance with good practice.	5.5.3 Transportation and storage of agrochemicals is safe and all applicable health, environmental and safety precautions are implemented.	Guidance 5.5.3 Areas used for the storage and distribution of agrochemicals, flammable and toxic substances are designed, constructed and equipped to reduce the risks of accidents and negative impacts on human health and the environment. Suggestions for reducing the risk of accidents and negative impact may be: restricted access, waterproof floor, barrier containment, storage area, safety data sheets, instructions for accidents, protection equipment, fire extinguishers, first aid, spillage elements, minimum ventilation and/or forced ventilation, housekeeping, separation of seeds, fertilizers and products. Legal requirements shall be followed for all farm sizes.	<i>We recommend adding into the scope of 5.5.3 the following on store construction, location, labelling and records. These requirements also apply to other pollutants like fuel and lubricant, so RTRS should decide how best to apply this information in the next version of the standard.</i> <i>- Stores for hazardous or unpleasant materials (including CPPs, human and veterinary medicines, fuel, potentially explosive fertilizers, manure, flammable waste etc.) must be constructed of suitable materials, kept secure, dry and well ventilated.</i> <i>- Hazardous material stores must be located where they minimize risks and offense to people and the environment during normal use and in foreseeable emergencies. This includes having separate stores for different hazardous materials (including CPP-contaminated PPE), waste, and ensuring that manure storage areas (stockpiles) are not located where leachate or unusually heavy rain will result in polluting water or environments of value for biodiversity, leisure or cultural activities.</i> <i>- Stores of hazardous materials must be clearly labelled to identify contents and to take action in case of emergencies</i> <i>- A record of all agrochemicals (CPPs and fertilizers) and medicines in each store must be kept outside the store for use by authorities in case of fire, theft or natural disaster, and in order to provide evidence of CPPs used and stored.</i>	Additions to guidance have been discussed but WG decided not to revise this indicator and leave it as it is.	No change	
	5.5.4 The necessary precautions are taken to avoid people entering into recently sprayed areas.				WG agreed on inclusion of a new guidance on communication to stakeholders on sprayed areas.	<b>New guidance 5.5.4</b> <b>Precautions may include, for instance, training on the matter, signage of sprayed areas or a mechanism that informs employees and external stakeholders which areas have been sprayed.</b>
	5.5.5 Fertilizers are used in accordance with professional recommendations (provided by manufacturers where other professional recommendations are not available).			<i>Professional recommendation</i> <i>Include chemical and biological inputs under the responsibility of the recommending party.</i>  <i>Is fertilizer use measured? Can N and P be measured during soil samples?</i>	WG considered that comments are not adding value as market regulations already consider recommendations.	No change

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
5.6 Responsible Use of Agrochemicals	5.6.1 There is no use of agrochemicals listed in the Stockholm and Rotterdam Conventions.		<p><i>Problem: In Argentina there are no registered replaces for Paraquat and its use is still allowed. Suggestion: Extend prohibition date.</i></p> <p><i>The deadline is January 2021 but now, in Argentina, we are the same as a few years ago (similar products but not the same, many times with a lack of product, etc). Can you move / postpone? For example, use in the fallow period could be accepted, but not as a desiccant, or something like that.</i></p> <p><i>Include at least in the guidance that Carbofuran is already banned since V3.0</i></p>	WG decided to address concerns and include bans of the two products in the guidance.	New guidance 5.6.2 Paraquat and Carbofuran are banned according to the Stockholm and Rotterdam Conventions.
	5.6.2 In countries where Paraquat can be used legally in agricultural production, producers are required to implement a program of progressive reduction of Paraquat over time. The implemented Integrated Crop Management Plan (see indicator 5.4.2) shall specify reduction targets for Paraquat and its phase out, which shall be implemented as soon as possible and not later than 2020. The use of Paraquat is prohibited from January 2021.			WG decided to delete this indicator as Paraquat would now be banned for all producers.	<del>Indicator 5.6.2 In countries where Paraquat can be used legally in agricultural production, producers are required to implement a program of progressive reduction of Paraquat over time. The implemented Integrated Crop Management Plan (see indicator 5.4.2) shall specify reduction targets for Paraquat and its phase out, which shall be implemented as soon as possible and not later than 2020. The use of Paraquat is prohibited from January 2021.</del>
	5.6.3 From January 2018 to December 2020, RTRS will have also a Non-Paraquat module in the platform during this phase out period.			WG decided to delete this indicator as Paraquat would now be banned for all producers.	<del>Indicator 5.6.3 From January 2018 to December 2020, RTRS will have also a Non-Paraquat module in the platform during this phase out period.</del>

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)	
5.9 Appropriate measures are implemented to prevent the drift of agrochemicals to neighbouring areas.	5.9.2 Records of weather conditions (wind speed and direction, temperature and relative humidity) during spraying operations are maintained.	Guidance 5.9.1- 5.9.2 Requirements for small farms should be appropriate to scale and context. For group certification of small farms - group managers may provide documented procedures and maintain records of weather conditions.	<i>Problem: Records of weather conditions (wind speed and direction, temperature and relative humidity) during spraying operations.</i> <i>Suggestion: The spreadsheet with the requested data is overly complex; when operating at the farm, how can Producers be expected to measure wind speed and direction, temperature, air humidity? They do not have equipment for it. It would not be feasible, as operations are already quite labor-intensive as they are.</i> <i>Producers already know the viable times and conditions for each Operation, and the Applications are based on visual observations of weather conditions and Times. Prior to spraying, Producers perform a flow test to determine the level of engine rotation needed to prevent any drift. My suggestion is for this indicator to be assessed through interviews, in which auditors would gauge the parameters followed by those in charge of Spraying to ensure the operation is carried out responsibly.</i>	WG did not see need to change the indicator, as special provision for small farms addresses the challenge already.	No change	
	5.9.3 Aerial application of pesticides is carried out in such a way that it does not have an impact on populated areas. All aerial application is preceded by advance notification to residents within 500m of the planned application. Note: 'Populated areas' means any occupied house, office or other building.			<i>Problem: We are not sure if the 500 m distance is sufficient to protect crops and health in surroundings.</i> <i>Suggestion: 500 m distance may be too little to protect crops and health in surroundings; please research if a 1000 m distance is better.</i>	WG considered 500m sufficient practice and did not revise. Consensus not to change	No change
	5.9.4 There is no aerial application of pesticides in WHO Class Ia, Ib and II within 500m of populated areas or water bodies.					No change
	5.9.5 There is no application of pesticides within 30m of any populated areas or water bodies. Note: 'Water bodies' includes, but is not limited to, water courses, intermittent rivers, rivers, streams, lagoons, springs, lakes, reservoirs and ditches (see Glossary).	Guidance 5.9.5 There may be an exception for manual application of chemicals not classified as WHO Ia, Ib, or II, if adequate measures are taken to prevent drift (e.g. use of backpack applicators with shields) and if it is permitted by Law and by manufacturer's recommendations.		<i>Consider expanding on 30m to crop buffer area and exceptions.</i>	WG decided not to revise as expanding the limit could be very harmful to the farm operations and eventually prohibit the correct application on all crop areas.	No change

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
5.10 Appropriate measures are implemented to allow for coexistence of different production systems.	5.10.1 Measures are taken to prevent interference in production systems of neighboring areas.	Guidance 5.10.1 When a change in soybean production practices is introduced, which could impact on neighboring production systems, it is the responsibility of the producer making the change to implement a buffer strip of 30 m (e.g. in areas where production is generally GM, it is the responsibility of an organic or non-GM farmer to maintain the buffer around his own production. In areas where production is mainly non-GM or organic, farmers planting GM or using chemicals should maintain a buffer strip). In countries or regions where it is proven that a buffer strip smaller than 30 meters is enough for preventing contamination and maintaining the purity of the neighboring systems, the buffer strip may be smaller and defined according to national level practices.	<i>"in the countries or region where it is proven that ... according to national level practices (should this be national interpretation?)."</i>	WG considered that this is clear and the answer is yes.	No change
5.11 Origin of seeds is controlled to improve production and prevent introduction of new diseases.	5.11.1 All purchased seed must come from known legal quality sources.		<i>Quality seeds To minimize the use of chemical fungicides, the seeds can be accompanied by phytopathological reports. Over the years, this will prevent pathogens from spreading in the area, given that relevant soil pathogens have disseminated through seeds. The production process must consider the environment - Soil and water conservation -Environment -Better soil and water conservation -Correct use of inputs - application of pesticides -The environment -Better soil and water conservation -Consider cultural issues - Respect the regional level -Respect workers - view workers as collaborators</i>	WG decided to add that producers can use their own seeds, respecting the legal requirements.	5.11.1 All purchased seed must come from <del>known</del> legally approved <del>quality</del> sources.  <b>New guidance 5.11.1 Producers can use their own seeds, respecting the legal requirements.</b>
1.1. Applicability of the General Chain of Custody System Requirements for Producers	1.1.2. Where organizations growing soy also purchase and handle soy grown by third parties, they shall apply the General Chain of Custody System Requirements for the Supply Chain instead of the General Chain of Custody System Requirements for Producers.	<b>COMMENTS RECEIVED:</b> <i>It is understood that when the producer acquires or manipulates soybeans from third parties, they must apply to the Supply Chain CoC, regardless of whether they apply to physical sales or credit.  Problem: Terms do not appear in alphabetical order. They are difficult to find. Suggestion: Order the terms in alphabetical order.  Add "Internal Control System (ICS)" Add "Vegetation – The plant life or total plant cover of the area." Modify "Wildlife - All animals, including vertebrates, mammals and charismatic animals," Modify "Zoning – The legal or regulatory classification of ..."</i>		DISCUSSION  Comment 1 shall be directly responded, comment 2 was acknowledged as a point to consider. More terms were discussed in a subgroup and the revision was forwarded with amendments to the board.	

## 4.4 Result of review of the second public consultation

### Summary of revisions in round 2 – PRINCIPLE 1: Legal Compliance and Good Business Practices

**Observation:** As the revised version of 3.1 has been submitted to the second consultation, we maintain the revised parts visible in red below and final edits appear in blue.

CRITERIA	INDICATOR	GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN BLUE)
1.1 There is awareness of, and compliance with, all applicable local and national legislation	1.1.1 Awareness of responsibilities, according to applicable laws can be demonstrated	<p><b>Guidance 1.1.1 – 1.1.2</b></p> <p>Producers need to have access to information, which enables them to know what the law requires them to do. Examples include having a register of laws, or access to relevant advice on legislation. Legal compliance should be verified through:</p> <ul style="list-style-type: none"> <li>- checking publicly available data on compliance where available;</li> <li>- interviews with staff and stakeholders;</li> <li>- field observations.</li> </ul> <p>The National Interpretation of the correspondent country will provide the scope of verification of the applicable law that producers need to demonstrate compliance with during the audit.</p>	<p><i>Farmers do not necessarily need to establish a register of laws but should keep themselves informed (maybe also through associations).</i></p> <p><i>Which institution may be the one disposing data for an evaluation of general compliance with laws</i></p>	WG considered to respond directly to the comment, no change necessary.	No change
	1.1.3 Producers must not be involved in any act of corruption, extortion, or embezzlement, nor in any form of bribery - including but not limited to - the promising, offering, giving, or accepting of any improper monetary or another incentive.	<p>Guidance 1.1.3</p> <p>Large producers shall have systems and a written policy in place to manage bribery risks in their organization.</p> <p>The systems shall:</p> <ol style="list-style-type: none"> <li>a. Identify and monitor those parts of the company that pose high risks of participation in bribery.</li> <li>b. Train relevant managers and employees on policies and procedures.</li> </ol> <p>The system may additionally include:</p> <ol style="list-style-type: none"> <li>c. Record of relevant gifts to and from third parties in a gift register, as per the company's policy.</li> <li>d. Investigation any incidences of suspected bribery within their organization.</li> <li>e. Sanction bribery and attempted bribery.</li> </ol> <p>The definition of large producers shall be determined on national level. In countries where there is a law related to this issue, legal compliance will be considered sufficient to comply with this indicator.</p>	<p><i>It is good to see that with this additional indicator 1.1.3. the element of Good Business practice from the principle 1 title now includes Good governance or Integrity (although neither of these two terms are mentioned and the scope is still fairly limited). However, under the heading of criterion 1.1 this seems to remain limited to corruption or bribery practices within the local or national legislative scope. This is too narrow. Relocate this new requirement to a new, separate criterion 1.4 with appropriate title and; 2. use of terminology to address anti-corruption, integrity and good governance.</i></p>	WG discussed the comments reflected on this and the next page but did not consider a new revision of the text or adding a new indicator to 1.1.	

CRITERIA	INDICATOR/GUIDANCE	COMMENTS RECEIVED	DISCUSSION/DECISION
1.1 There is awareness of, and compliance with, all applicable local and national legislation	1.1.3 Producers must not be involved in any act of corruption, extortion, or embezzlement, nor in any form of bribery - including but not limited to - the promising, offering, giving, or accepting of any improper monetary or another incentive.	<p><u>Continuation of comments received:</u></p> <ul style="list-style-type: none"> <li>• Requirements (Req.) on compliance with international regulations, a documented system for ensuring legal compliance to be in place, on legal/authorized boundaries to be clearly demarcated &amp; visibly maintained, relevant &amp; up-to-date permits are held (such as business legality, water use rights or land use titles), for soy supplies outside the unit of certification (farm boundaries) to be from legal sources</li> <li>• Provide guidance on the definitions of a large &amp; medium &amp; small farmer/producer. (2 comments in this sense)</li> <li>• Have a policy for ethical conduct to be in place and implemented in all business operations and transactions, including recruitment and contracts., a system in place to monitor compliance and the implementation of the policy and overall ethical business practice, include an indicator on conducting a due diligence assessment of business partners, including subsidiaries and contractors &amp; training workers on issues of corruption and bribery? (3 comments)</li> <li>• Have a documented process of continuous improvement to allow its monitoring (annual report to be submitted to RTRS Secretariat using a metrics template)</li> <li>• Requirements (Req.) on compliance with international regulations, a documented system for ensuring legal compliance to be in place, on legal/authorized boundaries to be clearly demarcated &amp; visibly maintained, relevant &amp; up-to-date permits are held (such as business legality, water use rights or land use titles), for soy supplies outside the unit of certification (farm boundaries) to be from legal sources</li> <li>• Provide guidance on the definitions of a large &amp; medium &amp; small farmer/producer. (2 comments in this sense)</li> <li>• Have a policy for ethical conduct to be in place and implemented in all business operations and transactions, including recruitment and contracts., a system in place to monitor compliance and the implementation of the policy and overall ethical business practice, include an indicator on conducting a due diligence assessment of business partners, including subsidiaries and contractors &amp; training workers on issues of corruption and bribery? (3 comments)</li> <li>• Have a documented process of continuous improvement to allow its monitoring (annual report to be submitted to RTRS Secretariat using a metrics template)</li> <li>• We suggest making it clearer in the guide how the producer should implement this indicator and how the implementation by the CB will be verified, as we consider that it is a little subjective to evaluate this indicator to verify compliance. Not finding evidence of corruption does not mean that the farm cannot be involved and the investigation of this topic may require a very high investment of time. The farm that will need to present evidence? What types of evidence? Are the results of public consultation sufficient to verify this indicator?</li> <li>• CB is not a government agency that has the authority to verify this type of information. Further clarification about the minimums to be implemented and verified in this indicator we consider to be important for the correct evaluation of this item.</li> </ul>	It was not deemed necessary to apply further changes. See comment on page 37. Mainly, WG members considered that the detailed process that the comments suggest is not compatible with the reality of the farms where normally only the management was exposed to risk of bribery or corruption. It was also alleged that national legislations exist and cover the issue. Furthermore, the WG rejected the idea to send additional reports to RTRS and it was discussed that CBs have the means to cover verification of this point.
1.3 There is continual improvement with respect to the requirements of this standard.		<ul style="list-style-type: none"> <li>• We think it is relevant to put more examples of how to implement these indicators (correlating with 4.1.1), because in practice we realize that producers do not understand how to do and / or which model to follow (although there is an example that is not popular) in Brazil). Many confuse it with the internal audit that the group certification manager must do (which is not the same thing). So, if possible, publish more details on how to do all this part of evaluation, identification of points to improve, determination of indicators and monitoring, we believe to be very important (and you can standardize the implementation among all certificates).</li> <li>• This draft of the standard talks about the RTRS Data Collection Sheet. We haven't found what that means</li> </ul>	No change, Guidance 1.3.1 to 1.3.3 is explaining this process.
	Guidance 1.3.3 The monitoring is done internally by the producer (group manager). An external auditor reviews the monitoring results on the processes and checks improvements made.	<ul style="list-style-type: none"> <li>• In the orientation it seems that continuous improvement is required as a mandatory requirement and there are campaigns that are not achieved for different and justified reasons.</li> <li>• Add "... or verify the justifications in case of not achieving improvements" into the orientation.</li> </ul>	No further change suggested, as the WG considered that the term monitoring sufficiently covers the need for progress.

## Summary of revisions in round 2 – PRINCIPLE 2: Responsible Labour Conditions

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN BLUE)
2.1 Child labour, forced labour, discrimination and harassment are not engaged in or supported.	2.1.1 No forced, compulsory, bonded, trafficked or otherwise involuntary labour is used at any stage of production.	2.1.1 Personnel should be free to leave their workplace after their hours of work have been completed, and be free to terminate their employment provided that they give reasonable notice. Reference: ILO Convention 29 on Forced Labour and 105 on Abolition of Forced Labour.	<i>Incorporate reference to "modern slavery". Closely review the indicator to ensure it more effectively addresses causes rather than symptoms, notably by shifting the attention towards labour recruitment practices (including the use of recruitment agencies). Where temporary or migrant workers are employed, establish &amp; implement a specific labour policy and procedures, refer to UN Convention on the Protection of the Rights of all Migrant Workers and Members of their Families Refer to ILO Conventions (29, 100, 111, 105, 138, 164, 182, 183, 184)</i>	WG considered not necessary to expand the indicator at this stage and suggested no further change.	No change.
	2.1.3 Spouses and children of contracted workers are not obliged to work on the farm.	Guidance 2.1.3 Personnel should be free to leave their workplace after their hours of work have been completed, and be free to terminate their employment provided that they give reasonable notice. Reference: ILO Convention 29 on Forced Labour and 105 on Abolition of Forced Labour.	<i>Provide appropriate structure for children &amp; spouses to be on the farm, doing their personal activities.  The guidance does not match with the criterion. It says that personnel should be free to leave their workplace after their hours of work have been completed but the criterion does not refer to personnel but to spouses and children.</i>	Guidance has been replaced by the guidance 2.1.3 which takes into account the comment receive.	<a href="#">Guidance 2.1.3 Farms need to provide appropriate structure for children and spouses to live on the farm, and do their personal activities assuring safe distance from eventual hazardous operational areas.</a>
	2.1.4 Children and minors (below 18) do not below age 18 must not conduct hazardous work that jeopardizes is likely to jeopardize their physical, mental or moral well-being.	Guidance 2.1.4 & 2.15 (see above 2.1.4) <b>They may accompany their family to the field as long as they are not exposed to hazardous, unsafe or unhealthy situations and it does not interfere with their schooling. Hazardous work likely to jeopardize children's physical, mental or moral well-being is defined as: working in dangerous locations, in unhealthy situations, at night, or with dangerous substances or equipment, or to carry heavy loads. Exposition to any form of abuse and trafficked, bonded or forced labour is forbidden.</b> Reference: ILO Convention 138 on Minimum Age and 182 on Worst Forms of Child Labour.	<i>Children working on the family farm. There are specific DOL exemptions for children working on a family farm. The guidance or expectations in the RTRS document go well above and beyond the requirements of the DOL. We would like to understand if there is 'flexibility' if a farm is following local, state or federal requirements.  <u>Exposition</u> means "a detailed description of explanation of a theory", we believe the right word may be exposure instead. Suggest to use the word toilets, as this is better understood globally and is more specific.  Include req. on keeping age records: system of identification to keep track of and monitor the age of workers, for a formal policy for the protection of children, including prohibition of child labour and remediation to be in place, and included into service contracts and supplier agreements.</i>	WG maintains indicator and guidance but corrects Exposition to Exposure.	Guidance 2.1.4 & 2.15 (see above 2.1.4) They may accompany their family to the field as long as they are not exposed to hazardous, unsafe or unhealthy situations and it does not interfere with their schooling. Hazardous work likely to jeopardize children's physical, mental or moral well-being is defined as: working in dangerous locations, in unhealthy situations, at night, or with dangerous substances or equipment, or to carry heavy loads. <b>Exposure</b> to any form of abuse and trafficked, bonded or forced labour is forbidden. Reference: ILO Convention 138 on Minimum Age and 182 on Worst Forms of Child Labour

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN BLUE)
2.1 Child labour, forced labour, discrimination and harassment are not engaged in or supported.	<p>2.1.5b. All children of direct employees living on the farm must have access to school education.</p> <p>2.1.6 There is no engagement in, support for, or tolerance of any form of discrimination.</p> <p>2.1.7 All workers receive equal remuneration for work of equal value, equal access to training and benefits and equal opportunities for promotion and for filling all available positions.</p>	<p><b>Guidance 2.1.6-2.1.7</b>  Discrimination includes, but is not limited to: Distinction, exclusion or preference to invalidate or harm equality of opportunity or treatment in employment, be it in the process of contracting, remuneration, access to training, promotion, lay-offs, lateral transfers or retirement, including:  a) Ethnic group, colour, sex, sexual orientation, gender, caste, religion, political opinion, national extraction or social origin;  b) Nationality or migratory status;  c) Civil status or social class;  d) Medical condition (including HIV status or disability);  e) Family condition, including pregnant women and parents with children, or any other protected status as included in applicable laws;  f) Worker organization membership or being an organizer;  g) Having filed complaints within the complaints or grievance mechanisms;  h) Unequal opportunities for gender when appointing management positions;  i) Political, religious, social, sexual or cultural opinions and convictions, views or affiliations of workers.  Divergence in salary is not considered discriminatory when the company has a policy that is fully known by employees, which specifies different pay scales for different levels of qualifications, length of experience, etc.  Reference: ILO Convention 100 on Equal Remuneration, and ILO Convention 111 on Discrimination.</p>	<p>Ensure that children have transportation and school supplies.</p> <p>Be more specific regarding Gender in 2.1.6 &amp; 2.1.7 (regarding equal payment for equal tasks, discrimination) and 2.2.3 regarding access to training. Also, regarding promotion of women in hierarchical positions.</p> <p>Be more specific regarding Gender in 2.1.6 &amp; 2.1.7 (regarding equal payment for equal tasks, discrimination) and 2.2.3 regarding access to training.</p> <p>Also, regarding promotion of women in hierarchical positions.</p>	<p>Inclusion of a public comment as new indicator, the rest of the indicators will have their numbers adjusted:  2.1.6 -&gt; 2.1.7  2.1.7 -&gt; 2.1.8  2.1.8 -&gt; 2.1.9</p> <p>Agreement to introduce policy and to highlight gender equality in payment in letter h) has been accepted. Also inserted reference to last paragraph which has not been changed.</p>	<p>2.1.5b became 2.1.6 and New Guidance 2.1.6 Farms ensure that children have adequate transportation and school supplies at disposal.</p> <p>2.1.7 There is a policy in place that shows the farm's commitment to not engage in, support, or tolerate any form of discrimination.</p> <p>2.1.7 became 2.1.8 and 2.1.8 became 2.1.9</p> <p>Guidance 2.1.7-2.1.8  Discrimination includes, but is not limited to: Distinction, exclusion or preference to invalidate or harm equality of opportunity or treatment in employment, be it in the process of contracting, remuneration, access to training, promotion, lay-offs, lateral transfers or retirement, including:  a) Ethnic group, colour, sex, sexual orientation, gender, caste, religion, political opinion, national extraction or social origin;  b) Nationality or migratory status;  c) Civil status or social class;  d) Medical condition (including HIV status or disability);  e) Family condition, including pregnant women and parents with children, or any other protected status as included in applicable laws;  f) Worker organization membership or being an organizer;  g) Having filed complaints within the complaints or grievance mechanisms;  h) Gender inequality in remuneration* and unequal opportunities for gender when appointing management positions;  i) Political, religious, social, sexual or cultural opinions and convictions, views or affiliations of workers.</p> <p>*Divergence in salary is not considered discriminatory when the company has a policy that is fully known by employees, which specifies different pay scales for different levels of qualifications, length of experience, etc.</p>



CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN BLUE)
2.2 Workers, directly and indirectly employed on the farm, and sharecroppers, are adequately informed and trained for their tasks and are aware of their rights and duties.	2.2.1 Workers (including temporary workers), sharecroppers, contractors and subcontractors have a written agreement, in a language that they can understand and is in compliance with local law.		<i>The requirements of indicator 2.2.1 are recommended in all cases. However, for small farms where there are high illiteracy rates, group managers may implement alternative mechanisms to make collectively known and verify valid working relationships: Is there any guidance on what these alternative mechanisms could be?</i>	Guidance for contracts with illiterate workers or farmers was included.	<b>New Guidance 2.2.1</b> In case of illiterate workers, guidance of the local regulation shall be followed to share the content of the contract and guarantee full understanding of all clauses.
	2.2.3 Adequate and appropriate training and comprehensible instructions on fundamental rights at work, health and safety, and any necessary guidance or supervision are provided to all workers.	<p>Guidance 2.2.3 If there are no regulations regarding frequency of health and safety-related training sessions, health and safety training shall be carried out at least on a yearly basis. These are some ideas where training (if of relevance) should be provided by the producer:</p> <ul style="list-style-type: none"> <li>• Handling, storage and disposal of crop protection products</li> <li>• Health and safety of working around biodigestors, manure pits, effluent ponds</li> <li>• Fertilizers choice, source, application rate and placement (based on soil and crop characteristics)</li> <li>• Risks of soil loss and degradation</li> <li>• Halting deforestation, biodiversity loss and ecosystem services</li> <li>• Energy and water scarcity (energy efficiency, sustainable irrigation systems, etc)</li> <li>• Waste minimization, segregation, storage and on-farm disposal.</li> </ul> <p>A training plan is established, to ensure that all legally required training is kept up to date and that all relevant farmers and workers are trained within 2 years of the first assessment. Training records are kept with the trainee information disaggregated by gender.</p>	<p>Guidance covers mainly health and safety, as well as environmental issues but not fundamental rights. If this is not covered under labour laws, trainings should also cover "fundamental rights" issues.</p> <p><i>With the recommendation, it would seem that only S&amp;H training is required in biodigestors, manure pits and effluent ponds??? The rest of the training in occupational safety and labor issues???</i></p> <p><i>I would add to the recommendation S&amp;H trainings on labor issues, CPR, and others and on labor law, for example pay stubs, overtime, rights and obligations.</i></p> <p><i>Good to see training on pesticide handling added, as an important part in the effective implementation of product stewardship.</i></p> <p><i>Ensure effective implementation and verification of this new requirement.</i></p> <p><i>Training for workers: include assessment of training, technical implementation of env. and soc. requirements mentioned in this standard: plan, implementation, maintenance, monitoring etc. (on farm biodiversity protection, native species, agrochemicals, corruption etc.), compliance with customs, norms and culture of local/indigenous communities.</i></p> <p><i>The guidelines refer to having a training plan to ensure that all legally required training is kept up to date. It's not clear what happens with training beyond law requirements.</i></p> <p><i>We suggest that the training plan is for all training, regardless of whether required by law or not.</i></p>	WG included training issue of worker rights and included other than legally bound trainings, too, in the scope of this indicator. Also added Other sustainable practices to be in line with FEAC.	<p>Guidance 2.2.3 If there are no regulations regarding frequency of health and safety-related training sessions, health and safety training shall be carried out at least on a yearly basis. These are some ideas where training (if of relevance) should be provided by the producer:</p> <ul style="list-style-type: none"> <li>• Handling, storage and disposal of crop protection products</li> <li>• Health and safety of working around biodigestors, manure pits, effluent ponds</li> <li>• Fertilizers choice, source, application rate and placement (based on soil and crop characteristics)</li> <li>• Risks of soil loss and degradation , an halting deforestation, biodiversity loss and ecosystem services</li> <li>• Energy and water scarcity (energy efficiency, sustainable irrigation systems, etc)</li> <li>• Waste minimization, segregation, storage and on-farm disposal.</li> <li>• <b>Other sustainable practices</b></li> <li>• <b>Fundamental rights and duties of workers</b></li> </ul> <p>A training plan is established, to ensure that all legally required and <b>other trainings</b> are kept up to date and that all relevant farmers and workers are trained within 2 years of the first assessment. Training records are kept with the trainee information disaggregated by gender.</p>

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN BLUE)
2.3 A safe and healthy workplace is provided for all workers.	2.3.5 There are mechanisms in place that make sure that workers follow the safety requirements.		<b>FEFAC alignment:</b> <i>There is a system of warnings followed by legally-permitted sanctions for workers that do not apply safety requirements.</i>	There was no objection to include this phrase of FEFAC as guidance: There is a system of warnings followed by legally permitted sanctions for workers that do not apply safety requirements.	<b>New Guidance 2.3.5:</b> There is a system of warnings followed by legally permitted sanctions for workers that do not apply safety requirements.
	2.3.7 In case of accidents or illness, access to first aid and medical assistance is provided without delay.		<i>First aid or medical assistance should be provided by qualified/trained personnel.</i>	No further change was deemed necessary. WG made clear that the issue is access to first aid is key and personnel should be trained to provide access to medical staff asap.	No change
			<b>FEFAC item:</b> <i>Producers make sure there is regular maintenance of machinery, equipment and materials in order to ensure safe functioning of these devices.</i>	Based on discussions, FEFAC indicator has been inserted and guidance provided.	<b>New indicator 2.3.8</b> Producers make sure there is a regular maintenance of machinery and equipment in order to ensure safe functioning of these devices.  <b>Guidance 2.3.8</b> The maintenance should follow the technical guidance of the fabricants and evidence such as maintenance plan or service reports need to be stored.
2.5. Remuneration at least equal to national legislation and sector agreements is received by all workers directly or indirectly employed on the farm.	Guidance 2.5 'Workers indirectly employed on the farm' refers here to employees of service providers who carry out services directly related to the production process. The scope of 'services directly related to the production process' will be defined by national interpretations.	<b>COMMENTS RECEIVED:</b> <i>Minimum wage is often not equal to living wage. Producers should work towards paying a living wage or a living income (in case of smallholders) in case this differs from minimum wages defined by national law. <u>A criterion suggestion for living wages or income could be:</u> The total remuneration (wages plus cash and in-kind benefits) for all types of workers is assessed yearly against the Living Wage benchmark in accordance with the Global Living Wage Coalition (GLWC). If the total remuneration is below the applied benchmark for any type of worker, management, in consultation with workers' representatives, implements a wage improvement plan to progress towards the applicable benchmark, including targets, actions, timeline and responsible persons. At a minimum, wages are adjusted yearly for inflation based on the national inflation rate.</i>  <i>For smallholders, the same procedure applies with regard to a living income benchmark. There should also be a criterion in the chain of custody standard ensuring that producers are able to pay living wages/incomes in terms of shared responsibility. A criterion of the new Rainforest Alliance standard could be an example: "The supply chain actor has a copy of the farm certificate holder's plan for wage improvement and has identified how and when support could be provided to achieve it. There is evidence that contributions to the farm's wage improvement plan are being made and align with modalities, targets and timelines as agreed upon with the farm certificate holder."</i>  <i>The standard should push beyond the legal minimum for wages and pay a living wage for workers. Many downstream buyers are demanding this and this indicator will become dated quickly if it does not aim for this --&gt; Promote Living Wage</i>	<b>DISCUSSION/DECISION:</b>  Living wage has been discussed in the working group and it was decided not to include it as a requirement.		

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN BLUE)	
2.5. Remuneration at least equal to national legislation and sector agreements is received by all workers directly or indirectly employed on the farm.	Indicator 2.5.5 Working hours of direct employees are recorded by the employer. In case of indirect workers, efforts must be undertaken to obtain lawful working hour records.	Guidance 2.5.5-2.5.6 Reference ILO Convention 1 on Hours of Work.	<i>For direct workers, due to the type of work carried out in the field, it is very difficult to obtain information, for indirect workers it would be almost impossible. In addition, the services are harvesting, sowing, spraying, in general they go to a percentage and do not have fixed hours to keep daily attendance records.</i>  <i>This requirement should be rethought. More guidance would be relevant. Indirect workers record working hours in written form and submit them to their employer?</i>	The issue was considered discussed in depth in the first round and no further change was considered.	No change	
	Indicator 2.5.6 Overtime work at all times is voluntary and paid according to legal or sector standards. In case overtime work is needed, workers receive timely notification. Workers are entitled to at least one day off following every six consecutive days of work.			<i>In this case, it is not clear that, if there is a less restrictive collective labor agreement, for example, that allows 1 break after 10 consecutive days of work, what overlaps? We think it is worth highlighting this for all indicators related to labor issues / legislation.</i>	The WG denied any possibility to open space for less restrictive regulations.	No change
	Indicator 2.5.9 Potable water is supplied to all employees inside the farm. If employees live on the farm, they additionally have access to bathrooms and hand washing and affordable and adequate housing and food. If charges are made for these, such charges are in accordance with market conditions. The living quarters are clean, safe, have basic sanitation and meet the needs of the workers.			<i>Reference to bathrooms. Suggest to use the word toilets, as this is better understood globally and is more specific.</i>	Suggestion to refer to bathrooms as toilets accepted.	Indicator 2.5.9 Potable water is supplied to all employees inside the farm. If employees live on the farm, they additionally have access to toilets and hand washing and affordable and adequate housing and food. If charges are made for these, such charges are in accordance with market conditions. The living quarters are safe and have at least basic sanitation.
				<i>Suggestion of a new indicator was raised on the comment that workers have a safe channel to report abuse and be represented in guaranteeing their rights. UK DD legislation on FRC: recommends a mandatory obligation for human rights due diligence &amp; action plans.</i>	New indicator and Guidance suggested to WG and accepted, also to attend AFI alignment.	<b>New Indicator 2.5.10</b> <b>Workers have a safe and effective channel to report abuses and be able to guarantee their rights.</b>  <b>Guidance 2.5.10</b> <b>There are permanent communication channels open between employers and workers.</b>

## Summary of revisions in round 2 – PRINCIPLE 3: Responsible Community Relations

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN BLUE)
<p><b>3.1</b> Channels (complaint and grievance) are available for communication and dialogue with the local community on topics related to the activities of the soy farming operation and its impacts.</p>		<p><b>Guidance 3.1</b>            Communication channels need to use local languages and appropriate means (e.g. Internet is not an appropriate mechanism for communication with communities that have no access to it).            Communication requirements must be adequate for identifying any disputes with traditional land users as referred to in Criterion 3.2.            Where people on or adjacent to the property are demonstrated to be illegal (e.g. squatters), producers should try to engage in communication, but they are not obliged to maintain a dialogue.            Local communities and other disenfranchised groups may be represented by legitimate representatives in communication or negotiation or in audit situations.            Where this is the case, this does not exempt the producer or the auditor from the responsibility of communicating with other members of the community, especially groups such as the poor, illiterate, youth, women or indigenous groups. Evidence of compliance with this indicator may be notifications submitted to neighbors and adjacent local communities.            It is important to include interviews with members of the community to evaluate the existence of the communication channels and their appropriateness.</p>	<p><b>AFI alignment:</b> Expand Criterion 3.1 to include indigenous peoples in the scope  <i>Add text to Criterion 3.1 to include, "...to allow them to effectively and meaningfully participate in decision-making about matters that affect them."</i>  <i>This is in certain circumstances a difficult definition "illegal squatters" as often traditional populations have been using the land for extracting fruits or hunting and have no legal land titles. There should be a requirement to balance those interests and needs. In the guidance it says that producers should engage in the dialogue but do not need to maintain it.</i>  <i>Not clear who is included under "disenfranchised groups"</i>  <i>Consider clarifying somewhere (maybe in annex) what disenfranchised groups are. Wording used needs to be reviewed.</i>  <i>Wording used needs to be reviewed "Reasonable proof may rely on specific criteria....direct relation with its purpose."</i>  <i>Perhaps "Reasonable proof may rely on specific criteria....directly relevant to its purpose?"</i>  <i>It would be good to refer to complaints and grievances explicitly (2 comments).</i>  <i>Perhaps "Communication should happen in a manner that is related to the importance of the issue".</i>  <i>Communication should happen in dependence with the relevance of the issue".</i></p>	<p>Indigenous people was explicitly included and text added to 3.1.             Disenfranchised groups has been included in the glossary.</p>	<p>3.1 Channels are available for communication and dialogue with the local community (including indigenous people) on topics related to the activities of the soy farming operation and its impacts. This shall allow them to effectively and meaningfully participate in decision-making about matters that affect them.             Guidance 3.1: Communication (complaints and grievance) channels for complaints and grievances need to use local languages and appropriate means (e.g. Internet is not an appropriate mechanism for communication with communities that have no access to it).             Communication requirements must be adequate for identifying any disputes with traditional land users as referred to in Criterion 3.2             Where people on or adjacent to the property are demonstrated to be illegal (e.g. squatters), producers should try to engage in communication, but they are not obliged to maintain a dialogue.             Local communities and other disenfranchised groups may be represented by legitimate representatives in communication or negotiation or in audit situations. Where this is the case, this does not exempt the producer or the auditor from the responsibility of communicating with other members of the community, especially groups such as the poor, illiterate, youth, women or indigenous groups. Evidence of compliance with this indicator may be notifications submitted to neighbors and adjacent local communities.</p>

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	3.1.2 The communication channels have been made known to the local communities.	Guidance 3.1.2 Evidence of compliance of this indicator may be notifications submitted to neighbours and adjacent local communities. Examples of communication channels maybe (but are not limited to): informing third parties on data such as the farm contact person, phone number and/or email, etc.).	<i>New: 3.1.2 The communication channels have been made known to the local communities, and they allow anonymous communication and dialogue according to their wish.</i>	Agreed that the wording of the indicator can be adjusted.	3.1.2 The communication channels have been made known to the local communities, <b>and they allow anonymous communication and dialogue according to their wish.</b>
3.2 In areas with traditional land users, conflicting land uses are avoided or resolved.		Guidance 3.2 When applying for certification, producers will identify local communities and traditional land users. Traditional land users will provide reasonable proof that they have been exercising use or access rights on the property area or on ecosystem services derived from the area over the last ten years, prior to May 2009. <b>Reasonable proof may rely on specific criteria, such as, official document/branded, recognized by the personnel and leadership, valid/updated, direct relation with its purpose.</b> In the case of traditional indigenous communities, Articles 14-18 of ILO Convention 169 also apply. Traditional land users may be represented by legitimate representatives in communication, negotiation or audit situations. Where this is the case, this does not exempt producers or auditors from the responsibility of communicating with other members of the community.	<i>AFI alignment: Expand scope to include indigenous peoples. Add requirement that the company identifies the indigenous peoples that exist within the production unit or that are affected by management activities. Then, through engaging with them, the company will identify their formal and customary rights to land, territories, and resources.</i>	Wording of the indicator has been adjusted after discussion in the group.	3.2 In areas with traditional land users <b>(including indigenous peoples)</b> , conflicting land uses are avoided or resolved.
	3.2.1 In the case of disputed use rights; a comprehensive, participatory and documented community rights assessment is carried out.	Community rights assessment should aim at: a) identifying the individual and collective uses and rights of local communities and traditional land users; b) identifying uses of water resources (if available); c) identifying the places and landscape conditions needed to meet these rights; d) identifying the places/issues where there is conflict between property rights and traditional land use rights and ecosystem services; e) finding a solution to resolve possible conflicting land uses and/or agree on proposals for compensation.	<b>COMMENTS RECEIVED BUT NO CHANGE HAS BEEN DONE IN 3.2.1 AS COVERAGE IS CONSIDERED SUFFICIENT:</b> <i>The case that the producer and / or person in charge of the property had criminal problems with the person (s) claiming the land. Include said antecedent and, if documented, apply the non-certification of the property Include criteria to seek Free, Prior and Informed Consent (FPIC) of local communities, require farmers to engage with affected stakeholders and document measures taken to resolve disputes related to land tenure, access and use rights Provisions for customary land rights: where there are no documents but ownership/rights, can customary land rights be demonstrated by other means such as consultations with chiefs, community leaders, family heads and other relevant stakeholders? Req.: Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc...), identified through engagement with these communities or indigenous peoples. Req.: Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or indigenous peoples. When the culture or natural resources necessary for the survival of these communities are in jeopardy, should farmers do anything to help restore them</i>		

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN BLUE)
	3.2.2 Where rights have been relinquished by traditional land users there is documented evidence that the affected communities are compensated subject to their free, prior, informed and documented consent.		<p><b>AFI:</b> Revise 3.2.2 to read, “the company makes sure that, prior to any activity that may affect local communities, indigenous peoples and traditional users’ rights, land, resources, territories and food security, their free, prior and informed consent (FPIC) is secured.”</p> <p><b>AFI:</b> Either as part of indicator 3.2.2 or a separate indicator, add that: in the event that company activities impinge on their rights, lands, resources, territories, livelihoods or food security, indigenous peoples and local communities (and traditional land users) are compensated or accommodated following the results of an FPIC process.</p> <p><i>In the case of traditional users, we understand that not everyone can be aware and clear of these processes and their purposes. Therefore, we suggest that this procedure be performed by an entity (NGOs for example) that act defending the rights of users.</i></p>	WG considered current indicator already clear and suggested no more change.	No change
	3.2.4 Sites of special cultural, ecological, economic or religious significance and resources fundamental for satisfying the basic necessities of <b>all traditional communities</b> , local communities and indigenous people (for livelihoods, health, nutrition, water, etc.) shall be clearly identified in cooperation with such people, and recognized and protected by farm managers.		<p>Reference to HCV 6</p> <p><i>This is identified through HCV assessments. There should be a guidance mentioning the HCV assessment for HCV 5 &amp; 6.</i></p>	As in the first round, it was not considered necessary to introduce the term HCV here.	No change
	3.3 An effective mechanism for resolving complaints and grievances is implemented and available to local communities, employees and traditional land users.		<p><b>AFI:</b> In addition to “employees”, add “and other workers.”</p> <p><b>AFI:</b> Key recommendation here and throughout when looking at requirements related to communities: Include “indigenous peoples”</p> <p><b>AFI:</b> Add to Criterion 3.3 or a new indicator within 3.3 that the company provides fair and just remedy if causes or contributes to the harm of human rights (including IP/LC and workers)</p>	Wording has been adapted to cover these groups.	3.3 An effective mechanism for resolving complaints and grievances is implemented and available to local communities (including indigenous people), employees, other workers and traditional land users.
	3.3.1 (before 3.3.2) Documented evidence of complaints and grievances received is maintained.		Community complaints & grievances: these mechanisms should allow anonymous and confidentiality, according to people wish.	Guidance on this has been added.	Guidance 3.3.1 Complaints handed in anonymously will also be dealt with.
	3.4.2 Whenever possible, there is collaboration with training programs for the local population.  Note: Small farms may participate in training programs where they exist. For groups the collaboration with training programs may occur at the group level.	Guidance 3.4.2 If it is not possible to apply this indicator, a justification shall be given to the auditor.	It follows the same as the previous version. We believe it is necessary to have more information, clarifying what covers the local population (many producers understand that it is only the employees, we believe it is broader than that), in addition to making it more detailed which are the cases that it is acceptable not to have collaboration with training (the farm must demonstrate that it promoted a training program, but there was no adherence? Or evidence that there is no budget for this? Examples for which the evaluation is not so subjective.	Wording has been adjusted to include indigenous people.	3.4.2 Whenever possible, there is collaboration with training programs for the local population (including e.g. indigenous people).

## Summary of revisions in round 2 – PRINCIPLE 4: Environmental Responsibility

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN BLUE)
4.1 On and off site social and environmental impacts have been assessed and appropriate measures taken to minimize and mitigate any negative impacts.		<p>Guidance 4.1</p> <p>The assessment should be appropriate to the scale of the operation.</p> <p>In case of group certification of small producers, different groups located in similar areas and having similar issues may exchange information in order to prepare and/or carry out the assessment, however, reports shall be prepared at group level.</p> <p>Where there are national requirements for impact assessments, which are adequate for meeting this Criterion (identified by the NTG), these shall be followed. Where there are no national requirements, auditors shall verify whether an adequate process has been followed (for instance “The Equator Principles’ Social and Environmental Assessment Procedure”).</p>	<p><i>On Guidance 4.1.1 &amp; 4.1.2 Guidance on the implementation of criteria:</i></p> <p>a) <i>Req. on assessing the environmental risks and impacts of production/ operations prior to any significant intensification or expansion of business operations/cultivation and infrastructure</i></p> <p>b) <i>Req. on the social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way, stakeholder engagement to achieve env. &amp; soc. targets: maintenance of stakeholder lists, public consultations or community liaison.</i></p>	WG acknowledge that the assessment needs to be redone prior to any expansion of the operation.	No change of criterion
	4.1.1 An initial social and environmental assessment is carried out prior to the first certification audit 1 (see also Indicator 1.3.1).	<p>Guidance 4.1.1</p> <p>Endemic, rare, threatened or endangered species shall be identified in this assessment (see also Indicator 4.5.3).</p>			4.1.1 An initial social and environmental assessment is carried out prior to the first certification audit (see also Indicator 1.3.1). <b>This assessment needs to be redone before any expansion of the operations take place.</b>
	4.1.2 The assessment is carried out by someone who is adequately trained and experienced for this task.				No change
	4.1.4 Measures to minimize or mitigate the impacts identified by the assessment are being documented, implemented and monitored.				<p><i>Mitigation hierarchy should be specifically cited in impact avoidance: Avoid, minimize, restore, offset.</i></p>

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN BLUE)
4.2 Pollution is minimized and production waste is managed responsibly. Note: Chemical use and disposal is dealt with under Principle 5.	<p><b>Indicator 4.2.2</b> All waste is adequately stored and disposed of (e.g. fuel, batteries, tires, lubricants, sewage).</p> <p>Indicator 4.2.4 Re-use and recycling are utilized wherever possible.</p> <p>Indicator 4.2.5 There is a residue management plan including all areas of the property.</p>	<p><b>New Guidance 4.2.2</b> If national regulations exist for the safe storage and disposal of different types of hazardous waste, they must be complied with. If there are no regulatory requirements, guidance should be sought on the best available options and advice should be taken. All waste disposal and composting areas on the farm (e.g. for household waste) must be at a safe distance from living areas and/or waterways. Measures must be taken to ensure that the farm is clean and tidy. Plastic waste and other rubbish should not be left in the fields, on field margins, around the farm or on roadsides. Farmers and workers should not throw rubbish and other general waste into ditches, streams or wells.</p> <p><b>New Guidance 4.2.4</b> The producer must explain why he does not apply recycling in case he does not use it for cases where it can be easily used.</p> <p><b>Guidance 4.2.5</b> For large and medium producers, this should be documented. For small farms or family farms, producers only need to know which residues are generated on their farms and what will be done with each one of them.</p>	<ul style="list-style-type: none"> <li>• <i>Pollution incidents: specific procedures/controls to deal with pollution incidents to mitigate environmental impacts, air pollution: requirements on emissions of air pollutants (excl. greenhouse gases).</i></li> <li>• <i>Waste reuse or recycling: ensure the wording is always gender inclusive: "why he/she does..." instead of the "producer/farmer" (4.2.4)</i></li> <li>• <i>Waste management in the production phase: managing, storing, transportation and disposal of waste streams, excl. wastewater (to avoid negative environmental impacts), uncontrolled waste landfilling: dumping in areas not officially demarcated as garbage dumps/landfills, waste volumes: total amounts of waste being produced (excl. wastewater).</i></li> <li>• <i>Wastewater quality &amp; volume: any precautions on the quality of wastewater or water discharge, on wastewater volumes (per unit of production)</i></li> <li>• <i>Resource efficiency: req. for farmers/producers to identify &amp; implement measures for improving efficiency in their consumption of energy, water and other resources and input materials i.e. water use efficiency in the farms with the aim of optimising water consumption per tonne of crop produced, use of renewable energy.</i></li> </ul>	<p>Higher degree of detail on waste management and procedure for pollution incident included.</p> <p>Circular Economy introduced in Guidance 4.2.4</p> <p>Include Circular Economy in the Glossary. Included wastewater treatment in 4.2.5 Guidance.</p>	<p><b>Guidance 4.2.2</b> If national regulations exist for the safe storage and disposal of different types of hazardous waste, they must be complied with. If there are no regulatory requirements, guidance should be sought on the best available options and advice should be taken. All waste disposal and composting areas on the farm (e.g. for household waste) must be at a safe distance from living areas and/or waterways. <b>Waste management must occur in the production phase by managing, storing, transportation and disposal of waste streams, no uncontrolled waste landfilling: dumping in areas not officially demarcated as landfills.</b> <b>The farm shall have a procedure in place in case of pollution incidents in order to mitigate potential damage of contaminations and leaks.</b></p> <p><b>Guidance 4.2.4</b> The producer <b>should adopt practices of Circular Economy</b> and must explain why he does not apply recycling in case he does not use it for cases where it can be easily used.</p> <p><b>Guidance 4.2.5</b> <b>Residues include non-organic and organic solid waste as well as wastewater that results from the operation.</b> For large and medium producers, this should be documented. For small farms or family farms, producers only need to know which residues are generated on their farms and what will be done with each one of them.</p>



CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN BLUE)
4.3 Efforts are made to reduce emissions and increase sequestration of Greenhouse Gases (GHGs) on the farm.	4.3.4 Opportunities for increasing carbon sequestration through restoration of native vegetation, forest plantations and other means are identified and, when possible, implemented.	<p>Guidance 4.3.4</p> <p>If producers cannot apply the identified opportunities for increasing carbon sequestration, a justification shall be given to the auditor.</p> <p>Other means may include:</p> <ul style="list-style-type: none"> <li>• Passively restore roadsides and fences</li> <li>• Establish forest plantations</li> <li>• Cover crops in degraded non-productive areas, as well as in floodplains or lowlands.</li> <li>• Conservation of non-native plantations that were previously used as shades for livestock.</li> </ul>	<p><i>Opportunity to increase carbon sequestration refers to "Passively restore roadsides and fences". Does this mean hedges? Edge of field?</i></p> <p><i>Safeguards against fragmentation of ecosystems or habitats, such as for example requirements on establishing or maintaining wildlife corridors or ecological niches, ecosystem protection through spatial management (conservation areas, set aside or buffer zones), wetlands and/or watercourses affected by agricultural activities.</i></p>	Agreed to add Ecological corridors as additional bullet in the guidance, accompanied by a technical note.	<p>Guidance 4.3.4</p> <p>If producers cannot apply the identified opportunities for increasing carbon sequestration, a justification shall be given to the auditor.</p> <p>Other means may include:</p> <ul style="list-style-type: none"> <li>• Passively restore roadsides and fences</li> <li>• Establish forest plantations</li> <li>• Cover crops in degraded non-productive areas, as well as in floodplains or lowlands.</li> <li>• Conservation of non-native plantations that were previously used as shades for livestock.</li> <li>• <a href="#">Build and maintain ecological corridors for biodiversity protection.</a></li> </ul> <p><a href="#">Note: Implementation of ecological corridors for biodiversity protection need specific technical guidance from specialists in this area.</a></p>
	4.4.2 After 3rd June 2016, no conversion is allowed in any natural land (see Glossary), steep slopes and in areas designated by law to serve the purpose of native conservation and/or cultural and social protection.			<p><i>According to this guide, it is ensured that there have been no changes in use since 2016, but in calculating the environmental impact of the change in use, the last 20 years are considered. So why only the last 5 years?</i></p>	It has been indicated that the calculation of impacts follows separate rules, but that the indicator will not be changed and the cut-off dates remain.

CRITERIA	CURRENT INDICATOR	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
4.4 Expansion of soy cultivation is responsible.	<p><i>New Indicator</i></p> <p><i>4.4.3 In cases where there were minimal levels of deforestation or conversion after the corresponding cut-off dates and they account for 5% of the total size of the farm or less, but no more than 50 hectares (whichever is stricter), the producer shall have in place a restoration plan effectively implemented at the time of the initial audit</i></p> <ul style="list-style-type: none"> <li><i>In case of conversion for infrastructure purposes: restore the same number of hectares as converted in areas with environmental gains (e.g. in biological corridors). If the mentioned areas are not available for restoration, the producer must restore 20% more hectares than what was originally converted, in a suitable area (refer to the guideline)</i></li> </ul> <p><i>In case of conversion for agricultural production: restore the same number of hectares as converted in areas with environmental gains (e.g. in biological corridors). If the aforementioned areas are not available for restoration, the producer must restore 20% more hectares than what was originally converted, in a suitable area (refer to the guideline). This conversion may not have taken place in a Category 1 area (red area) as featured on RTRS maps. This exception only applies to farms not yet certified.</i></p>	<p><i>It's not understood. Express it better so that the producer and what we verify we understand better.</i></p> <p><i>This opening for the entry of farmers with recent though limited deforestation, will create different cut-off dates, different "qualities" of deforestation free soy, which will cause unclarity in supply chain partners along the chain, and is thus undesirable. There should be no room for deforestation after the cut-off date of May 2009</i></p> <p><i>I believe minimal level of deforestation is an exploitable loophole and shows the RTRS to lack the courage of its commitment to no deforestation. - Remove the allowance for a minimal level of deforestation and maintain ZERO.</i></p> <p><i>AFi: Decrease the minimal conversion threshold, as described above.</i></p> <p><i>To improve clarity of this indicator, and toward alignment with the sector, consider adopting FEFAC guideline 34: No soy is produced in converted natural ecosystems (natural forest, native grasslands, wetlands, swamps, peatlands, savannas, steep slopes and riparian areas) after [the cutoff date of 2 June 2016]</i></p> <p><i>Within the requirement for restoration, add that this includes cases where the company acquired interest in the production unit.</i></p>	<p>As per subgroup decision, the new indicator 4.4.3 will be included in the guidance of 4.4.1c and as Annex 8.</p> <p>See new guidance at right and new Annex 8 on the next page.</p>	<p><i>New Guidance 4.4.1</i>  <i>If conversion/clearing takes place due to legal obligation (at the national or local level) or a verifiable emergency (such as firewalls) this indicator does not apply. Legal obligations may include but not be limited the need for roads, transmission lines, etc. Under certain circumstances minimal level of conversion may occur if there is a restoration plan in place. Please refer to Annex 8 and the definition of "minimal level of conversion" of the glossary according to the Accountability Framework Initiative.</i></p> <p><i>Guidance 4.4.1.c</i>  <i>Traditional land users will provide reasonable proof that they have been exercising use or access rights on the area of the property over the last 10 years prior to May 2009.</i></p>

**New ANNEX 8**

**Annex 8 – Minimal Level of Conversion Allowed**

In cases where there were minimal levels of deforestation or conversion after the corresponding cut-off dates and they account for 5% of the total size of the farm or less, but no more than 20 hectares (whichever is stricter), the producer shall have in place a restoration plan effectively implemented at the time of the audit:

- a) In case of conversion for infrastructure purposes, the producer shall restore the same number of hectares as converted in areas with environmental gains (e.g. in biological corridors). If the mentioned areas are not available for restoration, the producer must restore 20% more hectares than what was originally converted, in a suitable area.
- b) For producers that are not yet certified, conversion may occur for agricultural production after the cut-off dates if the producer restores the same number of hectares as converted in areas with environmental gains (e.g. in biological corridors). If the aforementioned areas are not available for restoration, the producer must restore 20% more hectares than what was originally converted, in a suitable area. This conversion may not have taken place in a Category 1 area (red area) as featured on RTRS maps.

This minimal level of deforestation/conversion shall be assessed cumulatively over time.

This minimal level does not apply if the local law is stricter. Further, the restoration must take place in the same production area that is certified RTRS.

The restoration plan will be crucial to the establishment of short, medium- and long-term objectives and shall be completed in accordance with the terms set forth in the plan. The auditor must be able to verify that the restored ecosystem includes dominant native species and resembles the prior or corresponding biome in species composition, structure, and function. The plan must be developed by a professional with the necessary skills, such as an agronomist or forest engineer, and producers shall take photographic samples that show the evolution of the restoration process.

Restoration must be carried out in a suitable area, meaning an ecosystem with similar climate, topography and soil characteristics. Likewise, the community of species in the converted ecosystem should resemble the community of the prior ecosystem and/or natural ecosystems in that location.

The restoration plan should include remediation for harm to human rights (e.g. land rights; right to access natural resources) where these rights have been affected by ecosystem conversion.

Soy produced in areas converted as per point b) shall be deducted from the total volume of soy produced in the farm. Under no circumstance converted areas can be subsequently used for agricultural certified crop production.

## Summary of revisions in round 2 – PRINCIPLE 5: Good Agricultural Practices

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN BLUE)
5.1 The quality and supply of surface and ground water is maintained or improved.	5.1.2 There is a plan that includes monitoring and mitigation measures according to risks that have been identified and it is applicable to the scale.	Guidance 5.1.2 The monitoring plan has to define parameters such as pH, temperature, dissolved oxygen, turbidity and electrical conductivity, contamination levels as well as the adequate frequency of test. Monitoring should be considered at watershed level. Where there are wells, these should be used for monitoring ground water.	<p><i>Climate adaptation concerns and related business risks are increasing (notably related to drought and other weather extremes affecting the most important soy regions), but appear to be only weakly addressed in this revision of the standard. We note modest additional guidance on climate mitigation efforts such as GHG emissions in 4.3 (guidance), carbon sequestration in 4.3.4 and no-tillage in 5.3.2. Knowing that this standard's lifespan will bring us even closer to the intermediate target date of the UN Paris Agreement in 2030, the standard should more explicitly show how it contributes to meeting the intermediate target reduction goals.</i></p> <p><i>Building on stronger risk identification (5.1.2 among others), strengthen both the climate mitigation requirements as well as adding the climate adaptation requirements by adding more rigor than in the draft.</i></p> <p><b>Additional requirements in the implementation of the principle:</b>  <i>-Impacts on water quality: are farmers required to take measures to minimize and mitigate negative impacts from operations on water resources</i>  <i>-Monitor impacts on soil and water: are farmers required to regularly monitor their impacts on soil and water and to adapt management as necessary for improvement.</i></p> <p><i>Req. on impacts on the water levels of surface and/or ground water (covered by ESIA)</i>  <i>Req. on water consumption e.g. water being abstracted from any source.</i></p> <p><b>FEFAC alignment:</b> <i>Water use on the farm is carefully monitored. Actions are implemented to reduce water use wherever possible</i></p> <p><b>Additional requirements in the implementation of the principle:</b>  <i>-Impacts on water quality: are farmers required to take measures to minimize and mitigate negative impacts from operations on water resources</i>  <i>-Monitor impacts on soil and water: are farmers required to regularly monitor their impacts on soil and water and to adapt management as necessary for improvement.</i></p> <p><i>Req. on impacts on the water levels of surface and/or ground water (covered by ESIA)</i>  <i>Req. on water consumption e.g. water being abstracted from any source.</i></p>	The WG discuss necessities to improve the indicators on water use and decided to include a new indicator 5.1.5.	
			<p><b>5.1.5 The different uses of water on the farm shall be identified.</b></p> <p><b>For those activities that require the biggest amount of water use, the producer shall seek for a way to monitor it.</b></p> <p><b>Actions shall be implemented to reduce water use wherever possible.</b></p> <p><b>Guidance 5.1.5</b>  <b>Legal and regulatory requirements would be sufficient to meet this indicator.</b></p>		

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN BLUE)
<p>5.3 Soil quality is maintained or improved and erosion is avoided by good management practices.</p> <p>Note: For group certification of small producers - Monitoring of soil fertility and soil quality should be part of the internal control system and can be carried out on a sampling basis within the group.</p>	<p>5.3.1 Appropriate monitoring of soil quality including taking soil fertility samples (soil organic matter) is in place.</p>	<p>Guidance 5.3.1 Identify appropriate <b>monitoring</b> indicators for <del>monitoring</del>, which need to be based on key issues according to production type and region. Any selected monitoring indicators should be straightforward and <b>provide</b> reliable information. Suggestions include: analysis of organic matter, total nitrogen (N) (total N can be estimated as 5% of organic matter), phosphorous (P), pH, electrical conductivity, measurement of surface residues (quality and quantity 30 days before the mean sowing date with a tolerance of +/- 10 days). <b>The soil management plan shall contain at least the following information:</b></p> <ul style="list-style-type: none"> <li>• <b>Soil sampling</b></li> <li>• <b>Crop rotation plan, including rotation with grasses</b></li> <li>• <b>Cover crop plan</b></li> <li>• <b>Type, quality and timing of fertilization, where efforts are made to keep the existing fertilization levels to a minimum.</b></li> <li>• <b>Procedures to avoid soil compaction</b></li> <li>• <b>Tools to prevent erosion caused by wind and water.</b></li> </ul> <p><b>The plan will have a minimum term of one complete rotation and will be carried out by the Agronomist in charge.</b></p>	<p><i>Suggest to remove reference to soil organic matter as it, and other measures, are detailed in the guidance.</i></p> <p><i>Producers are required to document all practices and justification of not implementing a practice. Practices vary depending on small, medium, or large scale operation. Our concern is producers' ability to maintain paperwork and records, and how audit results hold producers accountable while assisting in decision making and reporting. Additionally, if producers does not meet Good Agricultural Practices (GAP) or amend any audit findings, how does this affect the buyer of credits and/or physical soy from the farm?</i></p>	<p>Removed Soil organic matter in indicator.</p> <p>Second part of the guidance has been removed to and inserted in the guidance of 5.3.2.</p>	<p>5.3.1 Appropriate monitoring of soil quality including taking soil fertility samples (<del>soil organic matter</del>) is in place.</p> <p>Guidance 5.3.1 Identify appropriate monitoring indicators which need to be based on key issues according to production type and region. Any selected monitoring indicators should be straightforward and provide reliable information. Suggestions include: analysis of organic matter, total nitrogen (N) (total N can be estimated as 5% of organic matter), phosphorous (P), pH, electrical conductivity, measurement of surface residues (quality and quantity 30 days before the mean sowing date with a tolerance of +/- 10 days).</p> <p>-----</p> <p>Indicator 5.3.2 The farmer has knowledge of techniques to maintain and control soil quality (physical, chemical and biological) and the relevant techniques are implemented. At least 20% of the <b>productive area of the farm</b> should be zero tillage. Producers will have to justify the reason <b>in case they could not comply with this threshold.</b></p> <p>Guidance 5.3.2 &amp; 5.3.3 Techniques for maintaining soil quality may include:</p> <ul style="list-style-type: none"> <li>• Conservation agriculture</li> <li>• Crop rotation</li> <li>• Balanced fertilization</li> <li>• <b>Precision farming</b></li> <li>• <b>Nitrogen fixing plants</b></li> <li>• <b>Green manures</b></li> </ul> <p>Techniques for controlling soil erosion may include:</p> <ul style="list-style-type: none"> <li>• Management of on-farm roads</li> <li>• Management of sloping areas</li> <li>• Maintenance of permanent soil cover</li> <li>• Zero tillage (no-till farming)</li> <li>• <b>Contour tillage</b></li> </ul> <p>Knowing that zero tillage is often not possible, RTRS motivates producers to move towards zero tillage.</p>
	<p>Indicator 5.3.2 Knowledge of techniques to maintain soil quality (physical, chemical and biological) is demonstrated and these techniques are implemented. <b>At least 20% should be zero tillage. Producers will have to justify the reason why they could not do zero tillage.</b></p>	<p>Guidance 5.3.2 Techniques for maintaining soil quality may include:</p> <ul style="list-style-type: none"> <li>• Conservation agriculture</li> <li>• Crop rotation</li> <li>• Balanced fertilization</li> </ul> <p>Techniques for controlling soil erosion may include:</p> <ul style="list-style-type: none"> <li>• Management of on-farm roads</li> <li>• Management of sloping areas</li> <li>• Maintenance of permanent soil cover</li> <li>• Zero tillage (no-till farming)</li> </ul> <p><b>Knowing that zero tillage is often not possible, RTRS motivates producers to move towards zero tillage.</b></p>	<p><i>There seems to be some contradiction asking producers to do 20% tillage and then explaining this is often not possible and hence RTRS motivates producers to move to zero tillage. Is 20% referring to the total cropped land or only soy related? In which circumstances is less than 20% acceptable? Consider clarifying whether the 20% tillage is a recommendation or a requirement and under which circumstances is less than 20% acceptable.</i></p>	<p>Guidance extended to Indicator 5.3.3 on Soil erosion. Second part of guidance 5.3.2 has been inserted and modified.</p>	

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN BLUE)
5.3 Soil quality is maintained or improved and erosion is avoided by good management practices.	5.3.4 A crop rotation plan shall be implemented to prevent soy from being planted immediately over soy and to promote a time gap on the same field. During this gap, a second crop or pasture should be cultivated or, at least, land shall be left fallow or under cover vegetation for regeneration purposes.	Guidance 5.3.4 RTRS encourages producers to conduct crop rotation. In cases where it is not possible, producers will have to justify their decision.	<i>RTRS encourages producers to conduct crop rotation. In cases where it is not possible, producers will have to justify their decision. Is there ever a case where rotation is really not possible? Consider clarifying what is deemed as a suitable justification for lack of crop rotation.</i>  <i>Soil conservation practices: req. on the use of organic fertilizer inc. manure. Soil contamination: any strategies and practices to prevent soil contamination (e.g. salinization, acidification, overfertilization or other chemical soil contamination)</i>  <i>FEFAC: Farmers enhance the soil by applying crop rotation (minimum of 2 crops).</i>	Justification has already been included and is auditor have capacity to judge a justification. Guidance was slightly amended. Other comments are covered in the standard.	Guidance 5.3.4 RTRS encourages producers to conduct crop rotation. In cases where it is not possible <b>to follow the plan</b> , producers will have to justify their decision.
5.4 Negative environmental and health impacts of phytosanitary products are reduced by implementation of systematic, recognized Integrated Crop Management (ICM) techniques. Note: See Annex 6 for further information on ICM.		Guidance 5.4 Take into account scale and context especially for small farms – this relates to both the level of ICM expected and the records maintained.	<i>ONLY 5.4: The negative environmental and health impacts of phytosanitary products are reduced through the implementation of systematic and recognized techniques of Integrated Crop Management (ICM).</i>  <i>Take into account scale and context, especially for small farms. This relates to the expected ICM level and the records kept. (Take into account the scales not only small farms but also large farms and the inconvenience of monoculture that this implies in the negative impact.)</i>  <i>The structure of sections 5.4, 5.5. and 5.6 is confusing (use of "phytosanitary" to distinguish from chemical fertilizers, but then switch to agrochemicals in the same section?). Suggest to review terminology used across sections 5.4, 5.5. and 5.6 to ensure consistency.</i>	Text has been reviewed, slight adjustment in 5.4.	5.4 The negative environmental and health impacts of phytosanitary products are reduced <b>through</b> the implementation of systematic and recognized techniques of Integrated Crop Management (ICM). Note: See Annex 6 for further information on ICM.
5.5 All application of agrochemicals is documented and all handling, storage, collection and disposal of chemical waste and empty containers, is monitored to ensure compliance with good practice.					
5.6 Responsible Use of Agrochemicals	5.6.1 There is no use of agrochemicals listed in the Stockholm and Rotterdam Conventions.	Guidance 5.6.1 Paraquat and Carbofuran are banned according to the Stockholm and Rotterdam Conventions.	<i>Hazardous chemicals: include criteria on hazardous chemicals, as referenced by WHO class 1A and B, or banned by the EU or banned by the United States Environmental Protection Agency (3 comments on the same issue)</i>	Issue has been discussed and decided on round one.	No change

CRITERIA	CURRENT INDICATOR	CURRENT GUIDANCE	COMMENTS RECEIVED	DISCUSSION	REVISION AGREED (IN RED)
5.8 Systematic measures are planned and implemented to monitor, control and minimize the spread of invasive introduced species and new pests.			<b>FEFAC alignment of 5.8:</b> Producers are not allowed to introduce or use invasive species in the management unit	FEFAC wording integrated in 5.8: Producers are not allowed to introduce or use invasive species in the management unit.	Criterion 5.8 <b>Producers are not allowed to introduce or use invasive species in the management unit.</b> Systematic measures are planned and implemented to monitor, control and minimize the spread of invasive introduced species and new pests.
5.9 Appropriate measures are implemented to prevent the drift of agrochemicals to neighbouring areas.		Guidance 5.9.1- 5.9.2 Requirements for small farms should be appropriate to scale and context. For group certification of small farms - group managers may provide documented procedures and maintain records of weather conditions.	<b>FEFAC alignment of 5.9:</b> Agrochemicals shall be applied using methods that minimize harm to human health, wildlife, plant biodiversity, and water and air quality.	Criterion has been maintained.	No change
	5.9.3 Aerial application of pesticides is carried out in such a way that it does not have an impact on populated areas. All aerial application is preceded by advance notification to residents within 500m of the planned application. Note: 'Populated areas' means any occupied house, office or other building.			<b>Chemicals selective and targeted application:</b> chemicals are applied in an appropriate and cautious way to avoid negative effects on the environment, e.g. by drifting (especially, in case of aerial spraying).  <b>Use of genetically modified organisms (GMOs):</b> req. on management of GMOs.	Here is another indicator more related to the use of GMO. There is no need to add guidance on aerial spraying.