

# **Final Review Process Report V1**

**Document under review: RTRS Standard for Responsible Soy Production  
V2.0**

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# 1. Introduction

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The Roundtable on Responsible Soy Standard for Responsible Soy Production, version 2.0 (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 1 trial version.

The objective of this 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

# 2. Scope of the Standard under Review

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This standard applies to the production of all kinds of soybeans, including conventionally grown, organic, and genetically modified (GM). It has been designed to be used for all scales of soy production and all the countries where soy is produced.

# 3. Scope of the review

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The standard under review is the RTRS Responsible Soy Production Standard V2.0 (from now on “the standard”). The scope of this review is a full review of the standard (all the standard is open for changes).

The scope of the review will be based on all formal comments received during the Public Consultation Periods.

## 4. Working Group Members

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| Names  | Company                       | Country   |
|--|-------------------------------|-----------|
| <b>Producer Members</b>                        |                               |           |
| Luiz Iaquina                                   | Fazendas Bartira - Brookfield | Brazil    |
| Juliana Lopez -Fabiana Reguero                 | AMAGGI                        | Brazil    |
| Alejandro O'Donnell - José Luis Tedesco        | Aapresid                      | Argentina |
| William Bonalume                               | SLC Agrícola                  | Brazil    |
| <b>Industry Members</b>                        |                               |           |
| Pablo Casabianca                               | Syngenta                      | Uruguay   |
| Rodrigo Morais - Bernardo Martinez Ribaya      | Bayer                         | Argentina |
| Ezequiel Paul                                  | Nidera                        | Argentina |
| <b>Civil Society</b>                           |                               |           |
| Cassio Franco Moreira -Edegar de Oliveira Rosa | WWF                           | Brazil    |
| Hernán de Arriba Zerpa - Roxana Aragón         | Fundación Proyungas           | Argentina |
| Ulises Martinez Ortiz                          | Fundación Vida Silvestre      | Argentina |
| Harry van der Vliet                            | Solidaridad                   | Brazil    |
| <b>Observers &amp; Source of Information</b>   |                               |           |
| Verónica Weber                                 | Nidera                        | Argentina |
| Julieta Viglione - Mariano Salerno             | Schutter                      | Argentina |
| Daniel Kazimierski                             | RTRS                          | Argentina |
| Jimena Froján                                  | RTRS                          | Argentina |
| Paulina Villalpando                            | HCVRN                         | Mexico    |
| <b>Coordinator</b>                             |                               |           |
| Cecilia Gabutti                                | Consultant                    | Germany   |

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## 5. Process Duration

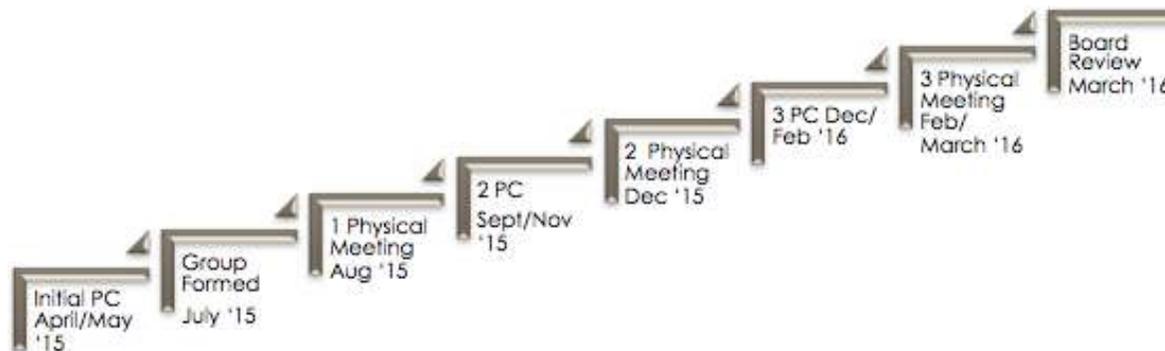
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The Review Process took a total of 11 months, starting in April 2015 with the first public consultation period and ending in March 2016 with the 3<sup>rd</sup> and final meeting of the Review Technical WG (RTWG).

The final draft was approved by the Executive Board of the RTRS in Amsterdam on March 14th, 2016.

## 6. Timeline of the Activities

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PC: Public Consultations

## 7- Public Consultations (PC)

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### *7.1 Public Consultation Duration*

During the review process, 3 PC were carried out:

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|---|--|
| <b>1<sup>st</sup> Public Consultation</b> | <b>8 April 2015 – 8 May 2015.</b>  |
| <b>2<sup>nd</sup> Public Consultation</b> | 2 September 2015 - 1 November 2015 + Extension period:<br>2 November – 15 November 2015. |
| <b>3<sup>rd</sup> Public Consultation</b> | 18 December 2015 – 1 February 2016 + Extension period: 2<br>February – 10 February 2016. |

### *7.2 Companies that participated in the Public Consultations*

More than 50 Companies from more than 18 countries:

Fundación Ambiente y Recursos Naturales (FARN), Shell, Rabobank, Aapresid, Amaggi, Fundación Proyungas y OSAS, Ybi Agro, APDC, Fundación Humedales, Desafiar, Grain farmers of Ontario, RTRS Secretariat, Ahold, Asda, COOP, Delhaize, Marks and Spencer, Migros, Sainsbury's, Tesco, The Co-operative Group, Waitrose, WWF International, Cert ID, Fundación Vida Silvestre, Superunie, National Wildlife Federation, Coop Sweden, Arla Foods, Martin & Servera, Lantmännen, HCV Resource Network, IUCN NL, Axfood, Danmarks Naturfrednings Forening, Snobelen Farms, Danube Soya, ICA, AKScan, , Guyra Paraguay, Universidad de Buenos Aires, Both Ends, Fund. Habitat y Desarrollo, FEFAC, Solidaridad, FAPCEN, Feed Alliance, Adecoagro, HCV Network, Bayer, Nidera, SAI Platform and Control Union.

## 8. Comments Received

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### *8.1 Comments received*

RTRS received more than 250 comments during the 3 Public Consultation Periods.

PC 1: 69 Comments

PC 2: 128 Comments

PC 3: 55

### *8.2 Comments Distribution*

|                    |                        |
|--------------------|------------------------|
| <b>Principle 1</b> | <b>5 Comments – 2%</b> |
| <b>Principle 2</b> | 46 Comments – 18%      |
| <b>Principle 3</b> | 32 Comments – 13 %     |
| <b>Principle 4</b> | 69 Comments – 27%      |
| <b>Principle 5</b> | 70 Comments – 28%      |
| <b>Others</b>      | 30 Comments – 12%      |

### *8.3 Annexes*

Annexes 1, 2 and 3 show all comments received.

Each annex shows the comments received during each public consultation period. Comments have been copied and pasted in the table in the same way that they have been received (sometimes they have been separated as there were multiple indicators related to one comment). The last column of the table shows the work, discussion points and/or conclusions of the working group.

All comments have been treated anonymously by the group members to avoid any political implications or preferences and in order to ensure that they all count with the same level of attention and importance during the discussions, however when it was needed and requested by group members the name of the company has been disclosed during the meetings.

## Annex 1: Comments received during the 1st Public Consultation

### Comments received during the 1st Public Consultation.

#### Document under Consultation: RTRS Standard for Responsible Soy Production V2.

Note 1: Comments are copied and added in this table as they were received. The last column represents the discussion points and conclusions that reflect the work of the Working Group.

Public consultation Period: 8 April 2015 – 8 May 2015.

1st Physical Meeting RTWG: 19-21 August 2015, Sao Paulo – Brazil

Group Members present at the meeting:

NGOs: WWF – Edegar de Oliveira; Fundación Proyungas – Hernán de Arriba.

Industry: Syngenta - Pablo Casabianca; Monsanto - Daniela Mariuzzo.

Producers: Fazendas Brookfield - Luiz Iaquinta; SLC Agrícola - William Bonalume; Amaggi – Fabiana Reguero.

Observers: Schutter – Julieta Viglioni; Consultant – Elton Caixeta.

RTRS Secretariat: Jimena Froján; Verónica Chorkulak.

Group Coordinator & Facilitator: Cecilia Gabutti.

Co-facilitator: James Allen

Companies that participated in the 1<sup>st</sup> Public Consultation:

Fundación Ambiente y Recursos Naturales (FARN), Shell, Rabobank, Aapresid, Amaggi, Fundación Proyungas y OSAS, Ybi Agro, APDC, Fundación Humedales, Desafiar, Grain farmers of Ontario & RTRS Secretariat.

|                    | Criterion/Indicator   | Issue  | Proposed solution   | Discussion/ Conclusion   |
|--------------------|---|--|---|--|
| <b>Principle 1</b> |   |  |   |  |
| 1                  | 1.2 Legal use rights to the land are clearly defined and demonstrable.<br><br>Note: Land use rights of traditional land users are considered in Criterion 3.2 | Concerning leases incorporate measures, mainly related to contracts that are accidental, since most of the national soybean production is performed under this type of contract. | Include measures establishing a minimum holding of the property (lease period) for at least three years as required by law of leases, at least in Argentina, avoiding shorter | <u>Conclusion:</u><br>The group considers that this issue should be treated in the National Interpretation (NI) process. |

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|   | <p>which should be cross-referenced with this criterion.</p> <p>1.2.1 There is documented evidence of rights to use the land (e.g. ownership document, rental agreement, court order etc.).</p>   |   | lease periods.  |   |
| 2 | <p>1.3 There is continual improvement with respect to the requirements of this standard.</p> <p>1.3.2 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 to demonstrate continual improvement with respect to the requirements of this standard; e.g. Soil carbon content, use of agrochemicals, state of</p> | <p>The free selection of indicators allows producers to select first the ones they comply with, for instance the principles related to compliance with national legislation, such as the principle 2.1 linked to child labor.</p> | <p>Establish a minimum requirement of indicators that must be met considering environmental issues and that go beyond the compliance with the national regulatory framework, for instance: crop rotation.</p> | <p><u>Conclusion:</u><br/>The group decided to leave the selection of the indicators up to the producer. The NI already addresses this list.<br/>A guide is added to clarify how indicators are selected.<br/>It is defined what Baseline means</p> <p>Guidance for 1.3.2: These indicators are selected based on the review process carried out according indicator 1.3.1</p> <p>Glossary:<br/>Baseline: data or information that is used as a basis for comparison.</p> |

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|                    | riparian vegetation etc. The baseline year is the year of first certification assessment.  |  |  |  |
| <b>Principle 2</b> |  |  |  |  |
| <b>3</b>           | <p>Responsible Labor Conditions</p> <p>Note1: Note 1: The requirements of Principle 2 apply to both direct employees and to workers supplied by third parties.</p>   | <p>Need to clarify to what extent these criteria apply to 3<sup>rd</sup> party workers. For example, presume this applies only to work conducted on the property of the certified farm. In other words, the 3<sup>rd</sup> party will not be audited for their entire operation. For example, indicator 2.1.8 would apply to work conditions at the certified farm only.</p> |  | <p><u>Conclusion:</u><br/>The group agreed to add a guidance that clarifies the case of companies that supply workers to the farm.</p> <p>The scope of the certification is the farm and its limits; therefore the third party needs to be checked according to this limit and the workers they have provided for the work at the certified farm.</p>  |
| <b>4</b>           | <p>2.1.5 Children under 15 (or higher age as established in national law) do not carry out productive work. 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>I've been advised that 15 is too high for some family farms.</p>  | <p>Further guidance should be provided to allow training opportunities which are safe and do not impact on the child's education, etc. Probably there should be a minimum but perhaps 12 is OK? US SSAP uses that age. Perhaps the definition of productive work should be improved?</p> | <p><u>Conclusion:</u><br/>The group agreed to add a guide regarding the work of children between 13 and 15 if they are not exposed to hazardous, unsafe or unhealthy situation.</p> <p>Family farm is also defined and added to the glossary</p> <p>A guide is added for:</p> <p>2.1.4-2.1.5 When considered as legal and essential on family farms (see Glossary), children between 13 and 15</p> |

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|   |  |  |   | <p>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.</p> <p>Family farm: A farm operated and mostly owned by a family, that produces soy, sometimes simultaneously with other crops and where the family provides the majority of the labour used. Such farms provide the main source of income. Work by children is acceptable on family farms, under adult supervision; when not interfering with education programs; when children are part of the family and when they are not exposed to hazardous working conditions.</p> |
| 5 | 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. | These criteria need to be lighter for smallholders/small family farms. | Smallholder guidance needs to be developed/reviewed for the entire RTRS standard. | <p><u>Conclusion:</u><br/>The group does not see a problem for small producers in the implementation of these requirements.</p> <p>Small producers may certify under a group certification scheme and the</p>  |

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|   | <p>3.1.1 Documented evidence of communication channels and dialogue is available.</p> <p>3.1.2 The channels adequately enable communication between the producer and the community.</p> <p>3.1.3 The communication channels have been made known to the local communities.</p>  |   |  | <p>group manager may implement these indicators as part of the Internal Control System.</p> <p>Add new Guidance:</p> <p>Evidence of compliance of this indicator may be that neighbors and adjacent local communities be notified. Examples of communication channels may be (but are not limited to): informing third parties on data such as the farm contact person, phone number and/or email, etc.).</p>             |
| 6 | <p>3.3 A mechanism for resolving complaints and grievances is implemented and available to local communities and traditional land users.</p> <p>Note: For group certification - the complaints and grievances mechanism can be managed by the group manager and records of complaints and grievances can be maintained at the group level.</p> <p>3.3.1 The complaints and grievances mechanism has</p> | <p>These criteria need to be lighter for smallholders/small family farms.</p> | <p>Smallholder guidance needs to be developed/reviewed for the entire RTRS standard.</p> | <p>It is considered that the implementation of the requirement is not complicated for small producers. Very small producers will certify under a group certification, and this could be part of the ICS.</p> <p>It is believed that the word mechanism creates confusion, it may be interpreted as that the producer has to disclose and communicate their procedure for complaints and grievances.</p> <p>Consensus:</p> |

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|                         | <p>been made known and is accessible to the communities.</p> <p>3.3.2 Documented evidence of complaints and grievances received is maintained.</p> <p>3.3.3 Any complaints and grievances received are dealt with in a timely manner.</p> |  |   | <p>Replace in the indicator 3.3.1 the word “mechanism” for “channel”.</p> <p>3.3.1 The complaints and grievances channel has been made known and is accessible to the communities.</p> |
| <b>Principle 3</b>      |   |  |   |  |
| <b>General Comments</b> | Comment 7   |  | <p>Principle does not address all legitimate land tenure rights and does not align with the Voluntary Guidelines on Responsible tenure of land. Rename to: principle 3: communication, Dialogue and conflict- resolution.</p> | <p>Consensus: without modification. The group considered that the word “Communities” is important in the title of the principle and decided that there is no need to change it.</p>    |
|                         | Comment 8   |  | <p>In all relevant criteria and indicators: replace traditional land users by "stakeholder with legitimate tenure rights" . This address informal rights, from traditional land users.</p>                                    | <p>It is considered that “traditional land users” is not a synonymous of “stakeholder with legitimate tenure rights”.</p> <p>Consensus: without modifications.</p>                     |
|                         | Comment 9   |  | <p>In all of principle 3: change communities into stakeholders. This addresses the problem that stakeholders be others than communities.</p>  | <p>It is considered that “traditional land users” is not a synonymous of “stakeholder with legitimate tenure rights”.</p> <p>Consensus: without modifications.</p>                     |

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|    | Comment 10  |  | Everything related to principle 3 should be reviewed against current leading standards or practices regarding grievance mechanisms, otherwise the standard is outdated.   | The group has reviewed the indicators related to grievances procedure in other comments.<br><br><u>Conclusion:</u><br>Without modification   |
| 11 | <p>3.3 A mechanism for resolving complaints and grievances is implemented and available to local communities and traditional land users.</p> <p>3.3.3 Any complaints and grievances received are dealt with in a timely manner.</p> | Problem: current standard does not say that the grievance mechanism needs to work in practice. This is not in accordance with current standards. | <p>3.3 “Mechanism” to be replaced by “an effective grievance and complaints mechanism”.</p> <p>3.3.3. Change “dealt with” into “adequately dealt with”. Also add: “the disputed part shows fair and adequate efforts and takes measures to do what is reasonably necessary to resolve complaints”. Same motivation.<br/>Add also: “no use of force violence or pressure is used in any way. Guards and staff cannot be armed, nor may armed forces be contracted or allowed to work with or for the land owner”.<br/>Motivation: armed force is not pic and not allowed in many international rights.</p> | <p><u>Conclusion 1:</u><br/>For 3.3: Include the word “effective”.</p> <p><u>Conclusion 2:</u><br/>Include “Adequately dealt with”.</p> <p>Discussion around the use of arms:<br/>The group considers that the ideal situation is not to use guns, but it is not practical in many national contexts, such as Brazil.</p> <p><u>Conclusion 3:</u> there is a consensus that it is not possible to suggest this in many countries. Without changes.</p> |

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|            |   |  | Add: “the company shall take measures to effectively remedy or compensate any infraction of legitimate rights of stakeholders”. Same motivation. | Final point (remedy/compensate stakeholders): this is consistent with indicators that require complying with the law.<br><u>Conclusion 4:</u><br>Without changes.   |
| <b>12</b>  | <p>3.3 A mechanism for resolving complaints and grievances is implemented and available to local communities and traditional land users.</p> <p>3.3.3 Any complaints and grievances received are dealt with in a timely manner.</p> | Clarify which communication channels are used for these complaints and grievances and define what it is meant by the term "timely manner". | Define “timely manner”   | <p>The group considers very hard to define “timely manner” as the different situations and the complexity of the problem may lead to address an issue in different periods of time. However the group considers important to highlight that an answer from the producer should come within 30 days after they have received a complaint.</p> <p><u>Conclusion:</u></p> <p>Add in the Guidance<br/>3.3.3 If the producer receives a complaint, he/she is required to send an answer within 30 days of receiving the complaint to start addressing the issue.</p> |
| <b>13:</b> | 3.1 Channels are available for communication and dialogue with the local community on topics related to the activities of the soy farming operation   | It is important to clarify the communication channels that will be used, for example, local radio, zonal newspapers, etc.                  | Write down specifically which communication channels must be use to inform the community, taking into account the consent, prior, free and       | There are some examples already in the guidance about communication channels; it is impossible to create a list with all possible communication channels. They could be different in different contexts and countries. The  |

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|    | and its impacts.<br><br>3.1.3 The communication channels have been made known to the local communities.   |  | informed consent of indigenous communities (OIT169).  | auditor is the one that needs to check if the communication channels are adequate.<br>This is also addressed in other comment.<br><br><u>Conclusion:</u><br><br>Without modifications.   |
| 14 | 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. |  | 3.2.2 change “compensated” into “fairly compensated” for the damages or losses incurred. This aims to solve the problem of fair compensation is not always fair and appropriate.  | The group considers that the word “fairly” may produce interpretation problems and that in this case there could be also legal aspects involved in how the compensation is estimated.<br><br><u>Conclusion:</u><br><br>Without changes   |
| 15 |   |  | A new indicator 3.5 is proposed with the following wording. "Inclusive business models are applied wherever possible, providing opportunities to stakeholders strengthening social cohesion, economic prosperity and more sustainable business" | This suggestion generated lot of discussion in the group. Some discussion points:<br><br>- This is a trend that is coming where business are required to be more inclusive.<br>- It could be a good opportunity for the RTRS to promote in its standard something related to this.<br>- This shall not be a requirement, but something that is wished.<br>- It could also create extra burden for producers. |

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|                    |  |  |   | <p>- It is hard to define what “Inclusive Business Models” means and it could be interpreted in different ways.</p> <p><u>Conclusion:</u></p> <p>The following text was agreed:<br/>         “Inclusive Business Models are applied whenever possible, providing opportunities to stakeholders, strengthening social cohesion, economic prosperity and more sustainable business.”</p> <p>There was no consensus regarding the location of the text in the standard.<br/>         The 2 options that were discussed:<br/>         Option 1: to put it in the Preamble of the RTRS as a statement.<br/>         Option 2: as a note in Principle 3.<br/>         Both options go for the Public Consultation.</p> |
| <b>Principle 4</b> |  |  |   |  |
| <b>16:</b>         | 4.1 On and off site social and environmental impacts of large or high risk new infrastructure have been assessed and appropriate measures taken to minimize and mitigate any negative impacts. | Establish mechanisms for the dissemination of environmental impact assessments and public participation, prior to the completion of the work, for example linked to the arts. 19, 20 and 21 of the General Environmental Law 25,675 in | Include in the guidelines public hearings and the public consultations (beyond the Web communication only) as key tools in citizen participation. | <p><b><u>This is already covered in the requirements:</u></b></p> <p>The assessment should be appropriate to the scale of the operation and the new infrastructure.</p> <p>Where there do exist national requirements for impact assessments,</p>  |

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|    | Note: For group certification – this also applies to large new infrastructure projects developed by the entity holding the group certificate, where the infrastructure is used by certified group members or the certified soy they produce. | Argentina.   |   | <p>which are adequate to meet this criterion (identified by the NTG) these are followed. Where not, the auditors must verify that an adequate process has been followed.</p> <p>Where no adequate legislation exists and national interpretation is not available, the Equator Principles’ Social and Environmental assessment procedure should be followed.</p> <p>See annex 1</p> |
| 17 | <p>4.2 Pollution is minimized and production waste is managed responsibly.</p> <p>4.2.2 There is adequate storage and disposal of fuel, batteries, tires, lubricants, sewage and other waste.</p>  | The legal requirements for fuel tank habilitation do not apply to the rural situation as these were meant for fuel service stations. | Fuel tanks: it is suggested the tanks conditions during the initial certification do not affect the certifications as long as it is accompanied with a plan of concrete and coherent management as such and as long as the initial situations of the tanks does not mean an imminent danger to the environment or to people. It is proposed not to required the formal habilitation of the tank by the Ministry of Energy as it does not conform to the | <p><b><u>Out of the Scope: Argentinean National Interpretation.</u></b><br/>Application of Law 24.051 should be reviewed.</p>   |

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|    |  |  | <p>rural situation (they are requirements applicable to fuel service stations). In the case that the tank is not in good conditions the proposed plan will serve to amend these deviations without jeopardizing the certification.</p> <p>The management plan should cover the legal requirements. If the law also requires a habilitation, the producer has to comply with it.</p> |   |
| 18 | <p>4.2 Pollution is minimized and production waste is managed responsibly.</p> <p>4.2.2 There is adequate storage and disposal of fuel, batteries, tires, lubricants, sewage and other waste.</p>                      | <p>The certification Bodies request to visit the storage areas for the certification.</p>                      | <p>It is suggested that the RTRS authorizes a documental audit for the storage facilities.</p>  | <p><b><u>Out of the scope of the work of the WG.</u></b></p> <p>Scope: Accreditation and certification requirements</p>   |
| 19 | <p>4.3 Efforts are made to reduce emissions and increase sequestration of Greenhouse Gases (GHGs) on the farm.</p> <p>4.3.2 If there is an increase in the intensity of fossil fuel used, there is a justification</p> | <p>Clarify the justifications that are considered acceptable or valid to increase the use of fossil fuels.</p> | <p>List with justifications.</p>  | <p><u>Conclusion:</u></p> <p>The group agreed that it is not possible to list all possible situations, and that there are already examples in the guidance.</p> |

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|    | for this. If no justification is available there is an action plan to reduce use.  |   |   |   |
| 20 | 4.3.3 Soil organic matter is monitored to quantify change in soil carbon and steps are taken to mitigate negative trends.  | These calculations are challenging for smallholders   | Smallholder guidance needs to be developed/reviewed for the entire RTRS standard.   | <p>The group discussed whether making exceptions would create a standard with double requirements, on one side requirements for big producers and on the other exceptions for smaller producers.</p> <p>The group considers that the standard is voluntary and for small producers the group certification scheme may be used.</p> <p><u>Conclusion:</u><br/>It was decided to add a note in the indicator 4.3.3 that says “For small producers complying with the criteria 5.3 is considered enough”</p> |
| 21 | <p>4.4 Expansion of soy cultivation is responsible.</p> <p>4.4.1 After May 2009 expansion for soy cultivation has not taken place on land cleared of native habitat except under the following conditions: 4.4.1.1 It is in line with an RTRS-approved map and system (see Annex 4.) or 4.4.1.2 Where no</p> | This criterion limits largely, the possibility of certification in areas where the agriculture is advancing (such as the Chaco in Argentina), where many of the social and environmental problems are now a bit marginalized. | Concrete conservation actions involving HCV areas could be used as compensatory measures for even legally transformed areas (according to the territorial planning and the deadline date set by RTRS). In this way it would be possible to develop sustainable landscapes (with a direct link between | <p>There was no consensus in this comment. Most of the present members agreed that some kind of flexibility might be possible. Other members requested time to consult with their constituencies and come back with a clearer position for the next meeting.</p> <p>Discussion points during the meeting:<br/>- Allow changes in the cut-off date only in cases where there is full legal compliance to perform it.</p>   |

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|  | <p>RTRS-approved map and system is available:</p> <p>a) Any area already cleared for agriculture or pasture before May 2009 and used for agriculture or pasture within the past 12 years can be used for soy expansion, unless regenerated vegetation has reached the definition of native forest (see glossary).</p> <p>b) There is no expansion in native forests (see glossary)</p> <p>c) In areas that are not native forest (see glossary), expansion into native habitat only occurs according to one of the following two options:<br/> Option 1. Official land-use maps such as ecological-economic zoning are used and expansion only occurs in areas designated for expansion by the zoning. If there are no official land use maps then maps produced by the government under the Convention on Biological Diversity (CBD) are used, and expansion only occurs outside priority areas for</p> |  | <p>production areas and secured areas for conservation).</p> | <ul style="list-style-type: none"> <li>- Keeping the cut-off date without exceptions exclude farmers that are trying to comply and produce soy in a more responsible way.</li> <li>- Producers go to other standards that allow them to certify because they do not have a cut-off date.</li> <li>- Opening new areas also help and allow developing the economy and the local communities.</li> </ul> <p>Conclusions from the exercise:</p> <p>Discussion on 4.4 was postponed for the next meeting.</p> <p>Task for group members:</p> <p>To prepare a proposal for 4.4 for the next meeting, considering either compensation for producers, changing cut-off date, etc.</p> |
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|    | conservation shown on these maps. Option 2. An High Conservation Value Area (HCVA) assessment is undertaken prior to clearing and there is no conversion of High Conservation Value Areas. Note: Where neither official land use maps nor CBD maps exist, Option 2 must be followed. |  |  |  |
| 22 | <p>4.4 Expansion of soy cultivation is responsible.</p> <p>4.4.1 After May 2009 expansion for soy cultivation has not taken place on land cleared of native habitat except under the following conditions.....</p>   | It is possible to be sustainable even with conversion areas after 2009 as long as it complies with legal requirements  | It is proposed to accept areas that were converted after the cut off date, if this conversion was carried out according national legislation.  | <p>Conclusions:</p> <p>Discussion on 4.4 was postponed for the next meeting.</p> <p>Task for group members:</p> <p>To prepare a proposal for 4.4 for the next meeting, considering either compensation for producers, changing cut-off date, etc.</p>  |
| 23 | <p>4.4.1 b</p> <p>There is no expansion in native forests</p> <p>Definition</p> <p>Areas of native vegetation of 1ha or more with canopy cover of more than 35 % and where some trees (at least 10 trees per hectare) reach 10m in height (or are able to reach</p>                  | The definition of the standard does not match with the definition of native forest that was used to develop the RTRS maps. The reason was that in order to use the original definition of the RTRS standard the mapping would have needed work at field level. Therefore another | For the map system that the RTRS developed a different definition of forest was used. The definition that were used were based on the available technology to identify the forest and other HCVAs. | <p>Discussion:</p> <p>There is no issue in the practice, the definition of the standard applies when there is no local legislation, but in cases of National Interpretation the definition has to be adapted to local conditions. The maps on the other hand offer guidance to producers and certification bodies and they have been developed using local legislation</p> |

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|    | these thresholds in situ (ie. In that soil/climate combination)).  | definition was used in order to allow RTRS to use the technology to produce these maps. |  | and available tools, which is why it is considered that there is no problem having 2 definitions.<br><br>Conclusion: the definition of native forest in the generic standard remains the same.  |
| 24 | 4.4.1 b<br>There is no expansion in native forests<br>Definition<br>Areas of native vegetation of 1ha or more with canopy cover of more than 35 % and where some trees (at least 10 trees per hectare) reach 10m in height (or are able to reach these thresholds in situ (ie. In that soil/climate combination)). |   | Review forest definition to align with globally widely accepted definitions of HCV and forests. Preferentially non-proprietary standards, including standardized methods. May be adapted in national contexts.<br>Motivation: unclarity in practice making it difficult to apply . | See comment before<br>Conclusion: the definition of native forest in the generic standard remains the same.   |
| 25 | 4.4 Expansion of soy cultivation is responsible.<br><br>Note: This criterion will be revised after June 2012 if RTRS-approved maps and system are not available.   | The wording should be adjusted to the Guidance System that the RTRS has developed.      | Change Map and system into Guidance and system.  | <a href="http://www.responsiblesoy.org/es/proyectos/mapas-rtrs/">http://www.responsiblesoy.org/es/proyectos/mapas-rtrs/</a><br><br><u>Discussion:</u><br><u>Conclusion:</u> the group accepted to change the wording, but it is important to note that this does not change the requirement to use the map. |
| 26 | 4.4 Expansion of soy   | In this regard it is important to review this criterion, so as                          | Review the criteria and incorporate specific   | <b><u>The preservation of wetlands is already covered under 5.2 Natural</u></b>   |

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|    | <p>cultivation is responsible.</p> <p>Note: This criterion will be revised after June 2012 if RTRS-approved maps and system are not available.</p>                     | <p>to ensure that the expansion of soybean continues not at the expense of the destruction and degradation of native ecosystems. RTRS Standard properly recognizes forests and deforestation as an impact of irresponsible expansion of soybean cultivation. But such policies do not incorporated into perspective wetland ecosystems and water as a key resource for man and for agricultural production. The maps that RTRS is developing have to consider weatlans and the existence of Ramsar sites and other wetland areas of importance for biodiversity conservation.</p> | <p>guidelines so the expansion of the soybean crop is not at the expense of the destruction and degradation of wetlands.</p> <p>For the maps development the criteria for these should include the distribution and character of wetlands and should be reviewed and adapted to each country.</p> | <p><b><u>vegetation areas around springs and along natural watercourses are maintained or re-established.</u></b></p> <p>5.2.1 The location of all watercourses has been identified and mapped, including the status of the riparian vegetation.</p> <p>5.2.3 Natural wetlands are not drained and native vegetation is maintained.</p> <p>Definition of wetland see annex 4</p> <p>Areas of marsh, fen, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water depth of which at low tide does not exceed six meters (Ramsar Convention).</p> |
| 27 | <p>4.4 Expansion of soy cultivation is responsible</p> <p>4.4.1 After May 2009 expansion for soy cultivation has not taken place on land cleared of native habitat</p> | <p>Native habitat has not been defined and it is not in the glossary.</p>   | <p>Define native habitat in the glossary as: “ecosystems of forests, wetlands and native grasslands”</p>  | <p>The group considers that the word “native habitat” is clear enough and there is no problem with its interpretation and that trying to define it could be more complicated than leaving it without a formal definition. Native habitat has not been defined in</p>   |

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|    | <p>except under the following conditions:</p> <p>c) In areas that are not native forest (see glossary), expansion into native habitat only occurs according to one of the following two options:</p> |   |  | <p>many other standards.</p> <p>Conclusion:<br/>Without changes.</p>   |
| 28 | <p>4.4 Expansion of soy cultivation is responsible.</p>  | <p>Include other impacts than soybeans, not only on natural ecosystems such as forests and wetlands, but also how it impacts on planned biodiversity (with crops chosen by the producer) due the expansion of monoculture, mainly in the Pampas region where natural ecosystems where replaced before 2009.</p> | <p>Including environmental measures to areas of high agricultural history, but with the same need for conservation. For example include crop rotation, etc.</p>        | <p>It was not possible to connect “soy expansion” with “crop rotation”.</p> <p>Conclusion:<br/>The group agrees that the issue about crop rotation should be addressed in principle 5.</p> <p>Creation of a new indicator:<br/>5.4.5 There should not be soy planted immediately over soy and there must be a gap between 2 plantations in the same field. During this gap, a second crop or pasture should be cultivated or at least there should be a regeneration of wild vegetation.</p> |
| 29 | <p>4.5 On-farm biodiversity is maintained and safeguarded through the preservation of native vegetation.</p> <p>4.5.1 There is a map of the</p>  | <p>More detail is required in the wording of this indicator</p>   | <p>The map should identify productive areas and areas of native vegetation. Especially it is suggested to highlight the existence of forest curtains, runners, and</p> | <p>Conclusion:<br/>The group agreed to add the word “ and productive areas “ in the indicator 4.5.1</p> <p>4.5.1 There is a map of the farm which</p>  |

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|                    | farm which shows the native vegetation.  |   | vegetation associated with river channels and remnants of forests that serve as connection with the most extensive patches of native vegetation.   | shows the native vegetation and <i>productive areas</i> .  |
| <b>30</b>          | 4.5 On-farm biodiversity is maintained and safeguarded through the preservation of native vegetation.  | This point refers to the conservation of biodiversity through the preservation of native vegetation. This is a very narrow view of the subject, whereby it will not be possible to reach the achievement thought by the criterion. The conservation of biodiversity not only depends on the preservation of native vegetation, but also and mainly depends on the preservation of native ecosystems such as wetlands, grasslands and forests. | It is suggested to replace the current text for this one: "The farm biodiversity is maintained and safeguarded through the preservation of ecosystems and native vegetation". Review the points related to this criterion and adequate them to the new text. | The group discussed the implications of adding the word "ecosystems". It was considered that this word might create more confusion for producers than the current wording. In the practice there are no problems in the implementation and in the certification of this indicator.<br><br>Conclusion:<br>Without changes |
| <b>Principle 5</b> |  |   |  |  |
| <b>31</b>          | 5.1 The quality and supply of surface and ground water is maintained or improved.<br><br>5.1.1 Good agricultural practices are implemented to minimize diffuse and | The term surface water is introduced which is indirectly a reference to wetlands. This is clear in the Argentinean NI where surface water is defined as: "Rivers, lakes, ponds, streams, swamps, marshes".  | It is recommended to replace "superficial water" to "wetlands" in the criterion 5.1 and in the indicator 5.1.1.<br><br>This is the text suggested:   | The word "Wetlands" produces a misinterpretation of what is covered under this definition. In countries like Brazil the word wetlands means "pantanal" and normally wetland is only identified with this kind of superficial water. The same happens in  |

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|    | <p>localized impacts on surface and ground water quality from chemical residues, fertilizers, erosion or other sources and to promote aquifer recharge.</p>   | <p>All these are wetland ecosystems according to the Ramsar Convention.</p>            | <p>5.1 The quality and supply of water in the wetlands and ground water is maintained or improved.</p> <p>5.1.1 Good agricultural practices are implemented to minimize diffuse and localized impacts on wetlands and ground water quality from chemical residues, fertilizers, erosion or other sources and to promote aquifer recharge.</p> | <p>Argentina. Therefore the group sees a risk replacing the word because the producer can give it a limited interpretation.</p> <p>Conclusion:<br/>The group considers that “superficial water” should be maintained and that in the glossary Superficial Waters/ wetlands should be added as synonymous.</p>   |
| 32 | <p>Guidance</p> <p>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.</p> | <p>Water quality indicators like dissolved O<sub>2</sub> requires sampling cooling</p> | <p>Another indicator that could be considered is (C) of metabolites. This indicator is good to infer possible agrochemical residues/fertilizer contamination.</p> <p>RTRS considers also: water pH, temperature, dissolved oxygen, turbidity and electrical conductivity.</p>   | <p>The group considers that sometimes it is very expensive to do this monitoring and sometimes is not needed depends on the risk.</p> <p>Conclusion:<br/>It is suggested to add new indicators:<br/>5.1.2 The producer is required to carry out a water quality risk assessment (add the guidance of globalgap as a guide for the producer).<br/>Note: For group certification the group manager as part of the Internal Control System may undertake this risk analysis.<br/>5.1.3 There is a plan that includes monitoring and mitigation measures according to the risk assessment. This plan should be applicable to the scale and it demonstrates that the applied</p> |

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|    |   |  |   | practices are effective.  |
| 33 | <p>5.1 The quality and supply of surface and ground water is maintained or improved.</p> <p>5.1.2 There is monitoring, appropriate to scale, to demonstrate that the practices are effective.</p>                             | <p>Monitoring water parameters such as pH, temperature, dissolved oxygen, turbidity and electrical conductivity will not make possible to detect levels of contamination by agrochemicals, which should be monitored according point 5.1.1 “Good agricultural practices are implemented to minimize diffuse and localized impacts on surface and ground water quality from chemical residues, fertilizers....”</p> | <p>It is recommended to incorporate the analysis and monitoring of the agrochemical level in wetlands and groundwater. To this end consider potential collaboration with universities and national or provincial research institutes.</p> | <p>Discussion:<br/>It is expensive for producers. If there is a risk of contamination this will be covered in the new added indicators (see previous comments) requiring a risk analysis.</p> <p>Conclusion:<br/>Without changes.</p> |
| 34 | <p>Guidance</p> <p>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.</p> | <p>To do the monitoring for the dissolved oxygen monitoring it is complicated because of the treatment that has the sample</p>   | <p>To ask for a different parameter like consumed oxygen. This parameter is required by DIPAS in Argentina</p>  | <p>Out of the scope of this WG. Should be part of Argentinean NI.</p>   |
| 35 | <p>5.1.2 There is monitoring, appropriate to scale, to</p>  | <p>The need for monitoring at watershed (Cuenca) level is</p>  | <p>The monitoring should be conducted at the facility</p>   | <p>Conclusion:<br/>Erase that the monitoring should be</p>  |

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|    | <p>demonstrate that the practices are effective.</p> <p>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.</p> | <p>mentioned, however it is unclear who will be responsible for such monitoring and how it will be organized / implemented when the watershed involves several producers.</p> | <p>level, using a good sampling design. For example, in the case of a stream running through a property, the producer could establish sampling stations at points of entry and exit of the river, which would give clarity on the contribution of the establishment. Consideration of the results should be made on a regional scale, that is taking into account the potential contribution of pollutants from other production facilities.</p> | <p>carried out at watershed level. The monitoring will be carried out at facility level.</p> <p>For example, in the case of a stream running through a property, the producer could establish sampling stations at points of entry and exit of the river, which would give clarity on the contribution of the establishment.</p>   |
| 36 | <p>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.</p>  | <p>Accredited lab availability in Argentina is poor.</p>  | <p>RTRS needs to evaluate the feasibility of these criteria and modify if not possible.</p>  | <p><b>Already addressed:</b></p> <p>The RTRS has expressed itself in the following communication:<br/>RTRS-ADV-001-02-LAB<br/><a href="http://www.responsiblesoy.org/documentos/acreditacion-de-laboratorios/">http://www.responsiblesoy.org/documentos/acreditacion-de-laboratorios/</a><br/>The laboratory should either be certified under ISO17025 or be verified by the Certification Body.</p> |
| 37 | <p>Accredited Laboratories</p>   | <p>Accredited laboratories: RTRS requires that the laboratories that analyze the samples are accredited under ISO 17025 or that they</p>                                      | <p>Aapresid authorizes laboratories that frequent the Interlaboratory rounds and SAMLA</p>   | <p><b>Already addressed:</b></p> <p>The RTRS has expressed itself in the following communication:<br/>RTRS-ADV-001-02-LAB<br/><a href="http://www.responsiblesoy.org/">http://www.responsiblesoy.org/</a></p>  |

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|    |   | implement it. This situation is not common in laboratories in Argentina at least in all the provinces.  |   | documentos/acreditacion-de-laboratorios/<br>The laboratory should either be certified under ISO17025 or be verified by the Certification Body.  |
| 38 | <p>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.</p> <p>Note: For group certification of small farms - Where irrigation is used for crops other than soy but is not done according to best practice, a plan is in place and is being implemented to improve practices. The group manager is responsible for documentation.</p> | In order to understand the implications of the water consumption through the use of an irrigation system, it is recommended to perform an environmental impact assessment.      | It is suggested to modify the text of the indicator 5.1.4 and replace it for this one: "Where irrigation is used, there is a prior environmental impact assessment and a documented procedure of good practices ... Similarly review the guidelines for the indicator 5.1.4. to adapt to this change. | <p>The group decided to leave the current indicator but erasing the last part as it creates confusion.</p> <p>Add in the guidance that for new irrigation systems an impact assessment is required.</p> <p>Conclusion:<br/>The indicator is modified (last part erased):<br/>5.1.4 Where irrigation is used, there is a documented procedure in place for applying best practices and acting according to legislation.<br/>Add in the guidance from 4.1.4 that: "for new irrigation systems an environmental impact assessment is required"</p> |
| 39 | <p>5.2 Natural vegetation areas around springs and along natural watercourses are maintained or re-established.</p> <p>5.2.3 Natural wetlands are</p>   | The term Natural wetlands is not defined in the standard. Natural wetlands could then be defined as the marine and coastal wetlands (categories A, B, C, D, E, F, G, H, I, J, K | It is suggested to define natural wetlands in the glossary of the standard based on the classification of different types of wetlands according to the Ramsar   | <p><u>Discussion</u></p> <p>Include in the glossary for the Natural Wetlands the Ramsar definition and its classification.</p>  |

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|    | not drained and native vegetation is maintained.   | and ZKA Ramsar, see Appendix I in this document) and as inland wetlands (categories L, M, N, O, P, Q, R, Sp, Ss, Tp, Ts, U, Va, Vt, W, Xf, Xp, Y, Zg, ZKB Ramsar; see Annex I).   | convention. See annex 1   |  |
| 40 | 5.2 Natural vegetation areas around springs and along natural watercourses are maintained or re-established.<br><br>5.2.3 Natural wetlands are not drained and native vegetation is maintained.                    | There are doubts about if the cut off date of the forests also apply to the wetlands.   | It is the interpretation of the RTRS that the same cut off date of May 2009 is applicable to wetlands, therefore it is suggested to incorporate this clarification in the guidance. | The cut-off date for wetlands is the same than for forests. This is how certification bodies have been working. This could be added as guidance in annex 1.<br><br><u>Conclusion:</u><br>Include in the guidance for 5.2.3 cut-off date for natural wetlands is May 2009.  |
| 41 | 5.3 Soil quality is maintained or improved and erosion is avoided by good management practices.<br><br>5.3.2 Knowledge of techniques to control soil erosion is demonstrated and these techniques are implemented. | It also should be controlled how these techniques are being implemented because for instance in the case of no till, in the practice the technique is not always applied in the proper way so the benefits are being partial. | Greater control in verifying the implementation of these techniques or practices.   | This comment is already addressed in the indicator 5.3.2 where it is requested not only to have the knowledge about the techniques but also it has to be demonstrated that these techniques are implemented.<br><u>Conclusion:</u> add the word “appropriately”<br>The indicator will be written as follows:<br>5.3.2 Knowledge of techniques to control soil erosion is demonstrated and these techniques are <i>appropriately</i> implemented. |
| 42 | 5.3 Soil quality is maintained or improved and erosion is  | In this and other indicators is not clear who carried out the   | We suggest including details on the implementation, the   | The group considers that it is not possible to include details on the  |

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|    | <p>avoided by good management practices.</p> <p>5.3.3 Appropriate monitoring, including soil organic matter content, is in place.</p> <p>Note: For group certification<br/>- 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>monitoring, who is responsible for it and the frequency they use to carry it out.</p>         | <p>monitoring and the consequences of detection of potential problems.</p>  | <p>implementation due to the resulting limitation of producer's flexibility on how to address the issue.</p> <p>Conclusion:<br/>Without changes</p>  |
| 43 | <p>5.4 Negative environmental and health impacts of phytosanitary products are reduced by implementation of systematic, recognized Integrated Crop Management (ICM) techniques.</p> <p>5.4.2 There is an implemented plan that contains targets for reduction of potentially harmful phytosanitary products over time.</p>                | <p>Clarify what would be potentially harmful phytosanitary products.</p>                         | <p>Make a list with the phytosanitary products that could be considered potentially harmful and the reasoning behind this list.</p> | <p><u>Discussion points:</u></p> <ul style="list-style-type: none"> <li>- Phytosanitary risk is already defined by WHO and universally accepted.</li> <li>- Products currently used are those that are accepted by international authorities.</li> <li>- All pesticides are classified under toxicological conditions.</li> <li>- Everybody in the group agrees that international and national regulatory systems cover this and there is already a definition of 'potentially harmful' in the guidance.</li> <li>- It is already addressed in the guideline 5.4.2</li> </ul> <p><u>Conclusion:</u> Without changes</p> |
| 44 | <p>5.4.3 Use of phytosanitary products follows legal requirements and</p>   | <p>In this regard crop rotation should also be considered as a method to prevent resistance.</p> | <p>Require crop rotation as a practice in pest management.</p>  | <p>Previous proposal from WWF:<br/>There should not be soy planted immediately over soy and there must</p>   |

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|     | professional recommendations (or, if professional recommendations are not available, manufacturer's recommendations) and includes rotation of active ingredients to prevent resistance.  |   |   | be a gap in between two soy plantations in the same field. During this gap, a second crop or pasture should be cultivated or at least there should be regeneration of wild vegetation.<br><u>Conclusion:</u> without changes in the indicator.<br>The inclusion of crop rotation as a specific indicator was proposed in a previous discussion (around 5.4.4). <u>This new proposed indicator, along with what exists in Annex 5, sufficiently responds to the issue raised here.</u> |
| 45  | 5.4.3 Use of phytosanitary 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. | A tool that is required in some provinces in Argentina is the Agronomic recipe. However sometimes it cannot be found. | In cases where the agronomic recipe is a law requirement, the producer has to comply with it. If not it is recommended at least to have a work order with at least the information included in the agronomic recipe and signed by a professional or suitable person in this matter. | <b>Out of the Scope: Argentinean NI.</b><br>However the indicator is very clear about the approach in the use of phytosanitary products.<br>1 Legal requirements and professional recommendations are followed.<br>2- If there are no legal requirements or professional recommendations the producers should follow the manufacturer's recommendations.  |
| 46: | 5.5 All application of agrochemicals is documented   | A tool that could be considered is the agronomic  | Ensure implementation of the agronomic recipe.  | See comment above, <b>Out of the Scope: Argentinean NI.</b>   |

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|    | and all handling, storage, collection and disposal of chemical waste and empty containers, is monitored to ensure compliance with good practice.   | recipe. This is a written document containing information on the professional who approved the application, the area where data is applied and the / the agrochemical / s used / s.   |  |   |
| 47 | <p>5.4 Negative environmental and health impacts of phytosanitary products are reduced by implementation of systematic, recognized Integrated Crop Management (ICM) techniques.</p> <p>5.4.4 Records of monitoring of pests, diseases, weeds and natural predators are maintained.</p>             | It is not clear who carried out the monitoring and who is responsible for it.   | It is suggested to include more details about the monitoring. In addition to recording the occurrence of pests it is also suggested to document any increased in the doses of chemicals or change in products, which often are related to the appearance of new pests. | <p>The group considers that these clarifications are not needed. If RTRS explains how implementation should be carried out, flexibility in terms of implementation options might be taken away from producers.</p> <p>Conclusion:<br/>Without modifications</p> |
| 48 | <p>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.</p> <p>5.5.2 Containers are properly stored, washed and disposed of; waste and residual</p> | Explain in which ways containers could be disposed as there are some ways mentioned but only as recommendations. Also, consider the extended producer responsibility (chemicals products) in the treatment of the containers. | List of methods or forms to be performed for the deposition of chemical containers.  | <p>The group considers that there is enough available information about this. Different countries have also different programs and laws regarding the methods and forms of disposal.</p> <p>Conclusion:<br/>Without modifications</p>                           |

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|    | agrochemicals are disposed in an environmentally appropriate way.  |  |   |  |
| 49 | <p>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.</p> <p>5.5.3 Transportation and storage of agrochemicals is safe and all applicable health, environmental and safety precautions are implemented.</p> | Subcontractors: It is suggested to apply minimum conditions for them in the case that they are responsible for transportation. Handling, storage, collection and disposal of waste and empty containers. | Subcontractors must comply with the standard requirements. For permanent agrochemicals deposits (>4000 Liters) it is suggested that in order to comply with this indicators during the certification audit at least the deposit complies with the following requirements: restricted access, waterproof floor, barrier containment storage area, safety data sheets, instructions for accidents, protection equipment, fire extinguishers, first aids, spill elements, minimum ventilation and / or forced ventilation, housekeeping, separation of seeds, fertilizers and products. For all sizes, legal requirements shall be followed. | <p><u>Discussion points</u></p> <ul style="list-style-type: none"> <li>- Farmers don't like to store agrochemicals on the farm.</li> <li>- Two issues: <ul style="list-style-type: none"> <li>i) Responsibility of sub-contractors at the farm (this is already covered in the discussion of other indicator.</li> <li>ii) RTRS provide guidance on storage of &gt; 4000 litres.</li> </ul> </li> <li>- There are also different legal frameworks in different countries.</li> <li>- Most of the group members advise not to change the indicator.</li> </ul> <p><u>Conclusion</u></p> <p>Include in the guidance of indicator 5.5.3 these suggestions as information on best practices.</p> |
| 50 | 5.6 Agrochemicals listed in the Stockholm and Rotterdam Conventions are  | It is important to recognize the Integrated Pest Management as an alternative to pesticides use. During the work of the  | We believe that the RTRS should develop its own approach / policy on Integrated Pest Management.  | 'THIS WAS NOT DISCUSSED, this comment will be addressed during next meeting.   |

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|  | not used. | <p>PUWG it was discussed to have a clear definition of IPM. According to the FAO1 :</p> <p>“Integrated Pest Management (IPM) is an ecosystem approach to crop production and protection that combines different management strategies and practices to grow healthy crops and minimize the use of pesticides. IPM programs use current, comprehensive information on the life cycles of pests and their interaction with the environment. This information, in combination with available pest control methods, is used to manage pest damage by the most economical means, and with the least possible hazard to people, property, and the environment. IPM is not a single pest control method but, rather, a series of pest management evaluations, decisions and controls. In practicing IPM, growers who are aware of the potential for</p> | <p>We believe that this policy should include clear criteria to avoid or minimize the impacts of pesticides on wetlands, water and biodiversity</p> |  |
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<sup>1</sup> <http://www.fao.org/tc/exact/sustainable-agriculture-platform-pilot-website/integrated-pests-management/en/>

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|    |   | pest infestation follow a four-tiered approach. The four steps include: 1) set Action Thresholds, 2) monitor and Identify Pests, 3) prevention y 4) control“. |   |  |
| 51 | <p>5.6 Agrochemicals listed in the Stockholm and Rotterdam Conventions are not used.</p> <p>5.6.2 The use of Paraquat and Carbofuran is eliminated by June 2017.</p> <p>5.6.3 During this phasing out period the use of Carbofuran and Paraquat should be controlled, if possible reduced according an Integrated Crop Management (ICM) plan developed by the producer, which explains under what specific circumstances the use of Paraquat and Carbofuran is allowed.</p> | The impact of these agrochemicals were largely debated by the Pesticides Use WG   | <p>Carbofuran and Paraquat should be banned for 2015/2016, therefore Fundación Humedales supports WWF’s proposal presented in the aforementioned WG that says:</p> <p>Include in Criteria 5.6: Carbofuran and Paraquat have a demonstrated reduced use until elimination in 2015/2016 crop (by RTRS certified producers) or in 3 years from certification;</p> <p>Indicators for 5.6 and 5.4:</p> <p>Carbofuran and Paraquat shall only be used in specific and exceptional circumstances as identified in national best practice guidelines.<br/>If Carbofuran and Paraquat are used, the plan for ICM</p> | This indicator was already discussed in a specific group (Agrochemicals WG). The changes proposed are not feasible. After changes in the RTRS standard are incorporated and after its approval, the RTRS has to communicate it and then it gives the producers 1 year (transition period) to adequate their processes to the new requirements. If the new version of the RTRS standard is approved by June 2016, the requirements will be enforced by June 2017, therefore it makes no sense to discuss this proposal. |

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|    |  |  | should include description of the exceptional circumstances where these are used and a plan with targets for elimination of these is implemented till complete elimination of these by 2015/2016 crop or 3 years from certification. |  |
| 52 | <p>5.7 The use of biological control agents is documented, monitored and controlled in accordance with national laws and internationally accepted scientific protocols.</p> <p>5.7.1 There is information about requirements for use of biological control agents.</p> <p>5.7.2 Records are kept of all use of biological control agents that demonstrate compliance with national laws.</p> | To make biological control a priority  |  | <p><b><u>Out of the scope, there is no specific proposal on how to address this issue about priority.</u></b> Not specific proposal for the standard. This is a strategic decision that should be addressed by the Board not by this WG.</p> <p>The standard already addresses the use of biological control agents.</p> |
| 53 | 5.9.3 All applying, handling, and storage of agrochemicals shall be done with proper training, licensing (when appropriate) and documentation submitted when requested by the auditor. For peri- urban areas   | This is unclear, what is a “peri-urban area” defined as? This creates some confusion with the language used. | Clarify the definition of “peri-urban area” in a Canadian context.   | <b><u>Out of the scope: Canadian NI</u></b>  |

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|    | where spraying is conducted, the producer shall inform neighbors, as requested, through appropriate means for the region (mail, signage on field edge, email, text message, or similar).   |  |   |  |
| 54 | <p>5.9 Appropriate measures are implemented to prevent the drift of agrochemicals to neighboring areas.</p> <p>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.</p> | The 500m limit is insufficient in some situations  | In some communities where the problem arose, a limit of 1500m is suggested. | <p><u>Discussion:</u></p> <p>There is a concern that the comment was made based on a specific situation.</p> <p><u>Conclusion:</u> If there is a specific case with the problem, this will arise during certification or audit.<br/>Without modifications</p>  |
| 55 | <p>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.</p> <p>5.9.5 There is no application of pesticides within 30m of any populated areas or water bodies.</p>   | The term mentioned is “water bodies” and there is a note with the definition of it. In these points the RTRS standard again refers with these definitions to wetlands. | Replace the term “water bodies” for “wetlands”.                             | <p><u>Discussion</u></p> <p>As it was already discussed, there is a risk of confusion at the national level about the definition of water bodies.</p> <p><u>Suggestion:</u></p> <ul style="list-style-type: none"> <li>- This could be a task for national interpretations (suggestion) to define water bodies.</li> <li>- There is some uncertainty about whether there could be confusion about the definition of wetlands at the</li> </ul> |

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|    | Note: 'Water bodies' includes, but is not limited to, water courses, rivers, streams, lagoons, springs, lakes, reservoirs and ditches.  |   |  | <p>local level.</p> <p>- In Portuguese and Spanish, there is a risk that wetland may be understood in a much more limited way than the English definition (just pantanals and large flooded areas).</p> <p>- The proposal of the group therefore is to include water bodies <u>and</u> wetlands, to avoid the aforementioned confusion.</p> <p>Conclusion: the final proposal is to use water body / wetland throughout the standard (but check this with a water expert to see if valid).</p> |
| 56 | <p>5.9.5 There is no application of pesticides within 30m of any populated areas or water bodies.</p> <p>Note: 'Water bodies' includes, but is not limited to, water courses, rivers, streams, lagoons, springs, lakes, reservoirs and ditches.</p> |   | What happens if there is a riverbed that in some periods of the year is dry? The distance of 30 m should be kept?  | <p>Conclusion:</p> <p>If there is a riverbed that in some periods of the year is dry, the distance of 30 meters still shall be kept.</p> <p>Add in the note for clarification "intermittent rivers"</p>  |
| 57 | 5.10.1 When a change in soybean production is introduced, which could impact on neighbouring systems, it is the responsibility of the producer making the change to implement a buffer strip of   | For over 15 years Canada has been a nation that grows both genetically modified and non-genetically modified crops to satisfy the divergent needs of our customers. Canada is recognized around the world for its segregation | In Canada, specified buffers of 3 meters in soybeans have been set between GMO and non-GMO crops (to maintain genetic purity). To address indicator 5.10.1, Grain Farmers of Ontario would recommend removal | <b>Out of the scope: Canadian NI</b>   |

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|                       | 30 meters. (e.g. in areas where production is generally GMO, it is the responsibility of an organic or non-GM farmers to maintain a buffer around his own production)  | <p>system and it is what sets us apart from our competitors. For the past 15 years Canada has adopted a system that allows for each type of crop to co-exist. By introducing a new standard to this system could jeopardize the industry and put Canada at a disadvantage.</p> <p>Furthermore, in regions of Canada, field sizes can range significantly. For instance, in Ontario, a field could be as small as 15 acres (6.07 hectares). In a field that is only 15 acres (6.07 hectares) maintaining a 30m buffer would take up a significant portion of the field.</p> | of the 30 meter buffer restriction between areas that have change in production. The solution would be to have farmers maintain a 3 meter buffer. A 3 meter buffer is already common practice in Canada between GMO and non-GMO to remain genetic purity. |   |
| <b>Other Comments</b> |  |  |   |   |
| 58                    | <p>When does the producer have to notify the Certification Body that they want to be audited?</p> <p>Is it possible that due the time of the audit some records are still empty when the producers have the certification audit?</p> |  |   | <b><u>Implementation and verification requirements. Out of the scope of this WG. Guidelines</u></b> |
| 59                    | Aapresid allows the producers that start complying with the  |  |   | <b><u>Out of the scope of this WG. Verification requirements</u></b>                                |

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|    | requirements in the new production period but that have not complied with the requirements in the previous production period. How does RTRS checks that producers have complied in the previous production period? |  |  |  |
| 60 | How the RTRS credits work in the platform, how do they have access to it. Can the producer offer the number of tons that it desires or is the RTRS that defines this?  |  |  | <b><u>Out of the scope of this WG Credit Trading Rules</u></b>   |
| 61 | The main audit and the surveillance audits, should be carried out in production time?  |  |  | <b><u>Out of the scope of this WG, but clarified already in the Accreditation and certification requirements for CBs.</u></b><br>A.2.5.3 the timing of the assessments shall be set freely by the CB.<br>Assessments shall take place during periods when farming operations are taking place. |
| 62 | Could the certificate be divided in different parts? 1 certificate of 300 tons in 3 certificates of 100 each?  |  |  | <b><u>Out of the scope: Certificate Trading Rules</u></b>  |
| 63 | In order to facilitate the compliance with the RTRS standard it is suggested to modify the progressive level   | There is a document for the progressive level approach for producers, where producers are require to comply with all | It is suggested to modify the enforcement of the requirements in the progressive entry level approach document. Full | <b><u>Scope of the comment related to the Progressive entry level approach for producers, not part of the scope of this WG.</u></b>  |

|    | approach document.  | the requirements after 3 years.  | compliance after 5 years instead of 3. |   |
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| 64 | Aspects that should be addressed in P&C and Guidance to align RTRS with the latest level of knowledge and science without choosing here where to address them | Transparency to stakeholders on status of operations, annual improvements, social and environmental performance is provided. |  | <p>Discussion:</p> <ul style="list-style-type: none"> <li>- Transparency is important, but there is a concern that too much public information may discourage some producers from choosing RTRS.</li> <li>- There should be a balance between transparency and private operation practices and sensitive information.</li> </ul> <p>- Guiding question: does the Standard need to be more transparent?</p> <p>- There is already an annual report, which is sufficient. No need to create a new instrument; rather just improve the current report, which is something that producers and certification bodies are implementing.</p> <p>- Comment: it could improve the transparency to include some additional information, e.g. about land rights</p> <p><u>Consensus:</u> without changes regarding transparency requirements. The public audit report already reflects the level of compliance of the producer and provides lot of information regarding its operation.</p> |

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| 65 |  | Members are committed to apply RTRS criteria and principles to all of their operations, including those of business they source from or in joint ventures they participate. As far as their operations are not 100% certified, they provide a time bound plan for the certification of uncertified operations, and they report progress on achieving the timeline plan. |  | <p><b><u>Out of the scope, part of the RTRS accreditation and certification requirements.</u></b></p> <p>However this could be debated in the WG as an additional requirement for producers.</p> <p>Comment:<br/>The RTRS standard applies to subcontracted activities. Regarding the uncertified operations and the time bound plan for their certification, there is a requirement that states that the producers need to comply with the spirit of the P&amp;C in all production facilities, however it is not subject to verification.</p> |
| 66 |  | Membership and its implications apply to all legal entities involved within the same industry group of legal entities.  |  | <p><b><u>Out of the scope of the standard because everything that is in the standard needs to be verified in order to be certified and these statements are not ruled by the P&amp;C.</u></b></p> <p>However it could be suggested to regulate this with the use of the RTRS claims or membership rules</p>  |
| 67 |  | Members promote inclusive business models.  |  | <p><b><u>Out of the scope of the standard because everything that is in the standard needs to be verified in order to be certified and these statements are not ruled by the P&amp;C.</u></b></p> <p>However it could be suggested to</p>  |

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|    |  |  |  | regulate this with the use of the RTRS claims or membership rules  |
| 68 |  | A new planting procedure is installed, publicly announcing new areas to be developed for planting where planting has not taken place before, with a six week public comment period for stakeholders to comment on potential adverse social and environmental impacts. The concerns are addressed in audit report. New planting announcements, comments, audit reports, are public. |  | <p><u>Discussion:</u><br/>This comment makes sense for palm oil, where you certify the company as a whole.<br/>But RTRS works differently, as it is farm based.<br/>This is a discussion for the future: for example, adding new land to the group.<br/><u>Conclusion:</u> this is something for the future, but nothing that should be changed now.</p> |
| 69 |  | Industry, trade and finance members publish their commitments to responsible soy sourcing, and report annually on their progress.  |  | <b><u>This is out of the scope of the P&amp;C standard because the standard under review is applicable to farmers, however this suggestion could be addressed in the RTRS membership requirements.</u></b>   |

Annex 2: Comments received during the 2nd Public Consultation. Comments regarding 4.4 and discussions around it are presented in the sub- annex 2 of this document.

**Comments received during the 2<sup>nd</sup> Public Consultation. Comments regarding 4.4 and discussions around it are presented in the sub- annex 2 of this document.**

**Document under Public Consultation: 1<sup>st</sup> DRAFT: RTRS Standard for Responsible Production V3.0**

Note: Comments are copied and added in this table as they were received. The last column represents the discussion points and conclusions that reflect the work of the Working Group.

**Public consultation Period:** 2 September 2015 - 1 November 2015 + Extension period: 2 November – 15 November 2015

**2<sup>nd</sup> Physical Meeting RTWG:** 1 – 3 December, 2015, Buenos Aires - Argentina

**Group Members present at the meeting:**

**NGOs:** WWF - Cassio Franco Moreira; Fundación Vida Silvestre - Ulises Martinez; Fundación Proyungas – Hernán de Arriba

**Industry:** Nidera –Ezequiel Paul & Débora Telles; Syngenta – Pablo Casabianca; Bayer – Rodrigo Morais & Bernardo Martinez Ribaya;

**Producers:** Fazendas Brookfield - Luiz Iaquina; SLC Agrícola - William Bonalume; Amaggi - Juliana Lopes; Aapresid – José Luis Tedesco

**Observers:** Nidera -Verónica Weber, Schutter – Mariano Salerno

**RTRS Secretariat:** Jimena Froján & Daniel Kazimierski

**Group Coordinator & Meeting Facilitator:** Cecilia Gabutti

**Companies that participated in the 2<sup>nd</sup> Public Consultation:**

Proyungas, Danube Soya, Axfood, ICA Svenge AB/ ICA Gruppen, AKScan, Lantmännen, Martin & Servera, Guyra Paraguay, WWF, UBA, Mc Donalds, Fundación Vida Silvestre, Both Ends, Fund. Habitat y Desarrollo, Arla Foods, FEFAC, National Wildlife Federation, Superunie, Solidaridad, FAPCEN, Shell, SLC Agrícola, Feed Alliance, Adecoagro, John Landers, Amaggi, HCV Network, Ahold, Asda, Coop, Delhaize, Marks & Spencer, Migros, Sainsbury's, Tesco, The Cooperative Group, Waitros, Bayer, Snoebelen Farms, Grain Farmers of Ontario, Nidera, Aprosoja, SAI Platform and Control Union.

| Criterion/Indicator                                     | Issue | Proposed solution | Discussion/ Conclusion |
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| Principle 1: Good Business Practices & Legal Compliance |       |                   |                        |

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| 1   | <p>1.3.1 A review process is carried out which identifies those social, environmental and agricultural aspects of the operation (on and off farm) where improvement is desirable.<br/>And<br/>1.3.2 A number of indicators are selected and a baseline is established to be able to monitor continual improvement on those aspects where desired improvements are identified.<br/>And<br/>1.3.3 The results of monitoring are reviewed and appropriate action is planned and taken when necessary to ensure continual improvement.</p> | <p>It is not clear what is exactly meant with the review process. Although FEFAC supports the concept of continuous improvement, it wonders whether the approach currently taken is practically applicable.</p> | <p>We would advise RTRS to give producers more guidance on this. For instance by providing a list of ‘approved’ agricultural advisors that can help the farmers draft a continuous improvement plan. Or by providing formats for such continuous improvement plan. We also want to make a reference to the approach taken by Agricultura Certificada (Aapresid) that gives detailed guidance on soil and water quality monitoring and improvement of certain important parameters.</p> | <p>Discussion:<br/>To provide a list of “approved advisors” can create a parallel business for advisors. This could be dangerous and RTRS would like to keep independence in this sense. To provide detailed guidance can take out flexibility to producers in terms of implementation possibilities. As this is an international standard that applies to different countries and different soy production conditions. It is very hard to provide detailed guidance in the generic standard.<br/>It is considered that the indicator is clear enough and that no additional guidance is required but minor modifications for better understanding could be considered.</p> <p><u>Conclusion:</u> The word “review process” has been replaced by “assessment”. The indicator has also been cross referenced with indicator 4.1.1</p> |
| Principle 2: Responsible Labor Conditions |  |   |  |  |
| 2   | <p>2.1.3 Spouses and children of contracted workers are not obliged to work on the farm</p>  | <p>Although FEFAC of course supports the fact that children nor spouses are obliged to work on the farm, this indicator seems to be covered already by the indicators on child labor and no forced labor.</p>   | <p>Leave this indicator out.</p>   | <p>Discussion</p> <p>It is important to keep the indicator, as the non-obligation for the spouses has not been defined previously in the indicators.</p> <p>It is part of ILO.</p> <p><u>Conclusion:</u> without modifications</p>   |

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| 3 | <p>Annex1 Guidance</p> <p>2.1.4-2.1.5 Where legal and considered 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</p> | <p>We find it important not to deviate from the ILO Convention 138 on Minimum Age and 182 on Worst Forms of Child Labor.</p>  | <p>We propose to keep the reference to the ILO Convention 138 on Minimum Age and 182 on Worst Forms of Child Labor</p>   | <p><u>Conclusion:</u> This is already covered and the ILO convention is referred in the guidance</p> |
| 4 | <p>Annex1 Guidance</p> <p>2.1.4-2.1.5 Where legal and considered 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</p> | <p>My concern is that the grower, if found to have had his children on the farm, must somehow prove that his/her children were on the farm less than the proposed 14 hours. For example, a time card for their child. Or including the children on the stakeholder interview “list”, during the audit, which some growers may take issue with.</p> <p>The other concern is that during the summer months, 14 hours could easily be exceeded. I’ve been told that children may spend well over that on the farm, just to be with their parents and not necessarily performing light or any type of activities.</p> | <p>Although this proposition is an improvement, I believe it to still be too subjective.</p> <p>I would not add the proposed draft amendment. I would only remove the following statement from the existing 2.1.5 indicator: “<b>Children under 15 (or higher age as established in national law) do not carry out productive work.</b>”</p> | <p>See comment 6</p>   |

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| 5 | <p>Guidance</p> <p>2.1.4 – 2.1.5 Where legal and considered 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</p> | <p>The problem with this is that despite children have the opportunity to help out around the family farm this is limited by 14 hours a week. In the summer season (July, August) students are not enrolled in school as they are on summer vacation. Therefore, a lot of students will be helping on the family farm and would easily exceed 14 hours in a week while not interfering with their schooling.</p>  | <p>In order to not create arbitrary hourly limits on what children can work on their own family farm the hourly limit of 14 hours should be ignored.</p>   | <p>See comment 6</p>   |
| 6 | <p>2.1.4 – 2.1.5</p>  | <p>We agree with the intention that is also in line with the ILO definition: Child labour refers to the employment of children in any work that deprives children of their childhood, interferes with their ability to attend regular school, and that is mentally, physically, socially or morally dangerous and harmful. However the way it has been translated into indicators in 2.1.4 and 2.1.5 is quite unclear:<br/>2.1.4: children under 18 do not conduct hazardous work</p> | <p>In 2.1.5 to leave out the sentence: children under 15 do not carry out productive work<br/>It is proposed: to add in the guidance as background the following explanation based on ILO wordings:<br/><i>Participation in some agricultural activities is not always child labour. Age- appropriate tasks that are of lower risk and do not interfere with a child’s schooling and leisure time can be a normal part of growing up in a rural environment. Especially in the context of family farming, small-scale fisheries and livestock husbandry, some participation of children in non-hazardous</i></p> | <p>Discussion:</p> <p>Keep it as it is. Following the ILO and adding this to the NI.<br/>It is important to differentiate “child labour” from “minors that help their parents”<br/>It was suggested to put some exceptions in the guidance, for instance the number of hours in Sommer.<br/>At the end it is suggested to leave it as it is and change the wording of the guidance.</p> <p><u>Conclusion1:</u> Indicator without modifications.<br/><u>Conclusion 2:</u> Add the guidance proposed</p> |

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|   |   | <p>or any work that jeopardizes their physical , mental or moral well being</p> <p>2.1.5 : children under 15 do not carry out productive work. 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>On the one hand it says that children under 15 should not be exposed to hazardous, unsafe or unhealthy work or work that interferes with their schooling. But the sentence before says they should not do any productive work.</p> | <p><i>activities can be positive as it contributes to the inter-generational transfer of technical and social skills and children’s food security. Improved 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 to the child and child labour, which is work that interferes with compulsory schooling and damages health and personal development, based on hours and conditions of work, child’s age, activities performed and hazards involved.</i></p> <p>From:<br/> <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>in the comment received.</p> <p><u>Conclusion 3</u>: the followig is added in the guidance “ the number of hours in summer that these minors may carry out light productive work on family farms shall be defined in the National Interpretation”</p>                                  |
| 7 | <p>2.1.5 : children under 15 do not carry out productive work. 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 The Constitution of India in the Fundamental Rights and the Directive Principles of State Policy prohibits child labour below the age of 14 years, Sentence also says they should not do any productive work.</p>  | <p>2.1.5 In place of children under 15 it should be 14</p>  | <p>Discussion</p> <p>This has to be addressed at the NI level in India. However it is not a problem as the requirement 1.1.1 is to comply with legal requirements.</p> <p><u>Conclusion</u>: if legal requirements are more restricted than the RTRS then the law has to be followed.</p> |

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| 8  | <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>2.2.1 Workers (including temporary workers), sharecroppers, contractors and subcontractors have a written contract, in a language that they can understand.</p> | <p>It is not usual to have a written contract with suppliers, labor contractors and providers.</p>   | <p>Consider that the documentation related to the payment of the service or selling of supplies is enough to proof this agreement.</p> | <p>Discussion:</p> <p>For the NI of Argentina AAPRESID is working with certificated subcontractors. The criteria of this certification should be checked.</p> <p><u>Conclusion:</u> The word “contract “ is replaced for “agreement” providing more flexibility in the documents that can prove this relationship and the conditions of it.</p> <p>Final 2.2.1</p> <p>2.2.1 Workers (including temporary workers), sharecroppers, contractors and subcontractors have a written <b>agreement</b>, in a language that they can understand.</p> |
| 9  | <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>Training to workers is not practical by producers, as they are illiterate and they hire labour for very short period of time i.e. 7-10 days during the one soy season</p> | <p>Periodical trainings for workers can be organized by group manager</p>  | <p><u>Conclusion:</u> Add a note to allow it.</p> <p>Note for 2.2.3: In case of group certification of small holders, periodical trainings for workers may be organized by group manager at group level.</p>  |
| 10 | <p>No related indicator</p>   | <p>Grievance procedures and compensation for workers (as they exist for communities, see 3. 3) do not exist<br/>Include a new criterion under 2.3</p>                        |  | <p>Discussion<br/>Instead of adding new indicators add the word employee to the 3.3 related criteria</p> <p><u>Conclusion:</u> Add in the 3.3 the word: employee (3.3.1 )<br/>New 3.3.1: The complaints and grievances</p>  |

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|    |   |  |  | channel has been made known and is accessible to the communities <b>and employees.</b>   |
| 11 | No related indicator  | Grievance procedures and compensation for workers (as they exist for communities, see 3. 3) do not exist | Include a new criterion under 2.3: (see example 3.3) | <p>Conclusion: Add in the 3.3 the word: employee (3.3.1 )<br/>Keep 3.3 with proposal</p> <p>New 3.3.1: The complaints and grievances channel has been made known and is accessible to the communities <b>and employees.</b></p>  |
| 12 | 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. | It is not clear how often the company should train their employees                                       | Is it possible to establish the periodicity?         | <p>Discussion</p> <p>This is an issue for health and safety, it is important that for this a training is carried out at least once a year.</p> <p>It is also considered that not all aspects need the same training periodicity, to establish a periodicity for all kinds of trainings take out the freedom of producers to plan it as it suits them better and according to real needs.</p> <p><u>Conclusion</u> to add a guidance for 2.2.3: If there are no related laws that regulate health</p> |

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|    |   |  |  | and safety periodicity trainings, health and safety trainings shall be carried at least on yearly basis.   |
| 13 | 2.3.5: There is a system of warnings followed by legally permitted sanctions for workers that do not apply safety requirements  | We suggests RTRS to consider rephrasing this indicator. Instead of working with sanctions, a farmer could for instance also work with rewards.   | It is probably more effective to describe the end goal ‘there are mechanisms in place that make sure workers follow the safety requirements’ than the means ‘a sanction system’  | <u>Conclusion:</u><br>New wording for 2.3.5:<br>There are mechanisms in place that makes sure that workers follow the safety requirements.   |
| 14 | 2.5.3 Normal weekly working hours do not exceed 48 hours. Weekly overtime hours do not exceed 12 hours. and<br>2.5.4 If additional overtime hours are necessary the following conditions are met:<br>a) It only occurs for limited periods of time (eg. peak harvest, planting).<br>b) Where there is a trade union or representative | Via its contact with farmer organizations in all parts of the world, We have learned that limiting overtime in agriculture is very difficult. Although the attempt to describe in detail under what conditions overtime is allowed is admirable, FEFAC suggests a more practical approach. | We consider it more important that workers can at all time determine for themselves whether or not they want to make more hours a day. Furthermore workers have to receive appropriate payment for this work. When these two conditions are met, it is probably not necessary to prescribe exactly under which conditions overtime is allowed. | <u>Discussions:</u><br><ul style="list-style-type: none"> <li>- There are always local laws that regulate these situations. It is hard to imagine that hours can be determined freely.</li> <li>- There is always legislation in this regard.</li> <li>- The other issue is safety reasons.</li> <li>- The limit in the working hours is not meant only to avoid exploitation but also to protect people from fatigue and avoid</li> </ul> |

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|    | <p>organization the overtime conditions are negotiated and agreed with that organization.</p> <p>c) Where there is no trade union or representative organization agreement the average working hours in the two-month period after the start of the exceptional period still do not exceed 60 hours per week.</p>  |  |   | <p>accidents.</p> <p><u>Conclusion:</u> Without modifications. It's a matter of risk and legal requirements.</p>  |
| 15 | <p>2.5.4 If additional overtime hours are necessary the following conditions are met:</p> <p>a) It only occurs for limited periods of time (eg. peak harvest, planting).</p> <p>b) Where there is a trade union or representative organization the overtime conditions are negotiated and agreed with that organization.</p> <p>c) Where there is no trade union or representative organization agreement the average working hours in the two-month period after the start of the exceptional period still do not exceed 60 hours per week.</p> <p>2.5.5 Working hours per worker are recorded by the employer.</p> <p>2.5.6 Overtime work at all</p> | <p>Although this is feasible for the personnel under the CBA, it is not applicable to personnel not covered by the scope of the Collective Bargaining Agreement (e.g. Agronomic Engineers, and Junior Engineers “Ayudantes de Agricultura”).</p> | <p>The regime for personnel not covered by the CBA is completely different. These employees work for objectives and not for rigid timetable. Although they could have very rare cases of overtime, the truth is that all through the year they could freely determine their own working hours and compensate the sporadic days that overtime is needed. This is a clear reflection of the agricultural production in Argentina, not only in our Company. That is why we understand that indicators 2.5.4; 2.5.5 and 2.5.6 should only apply for personnel under the scope of the CBA.</p> | <p>See comment 14</p> <p><u>Conclusion:</u> Without modifications. Safety reasons.</p> <p>There are legal requirements that cannot be avoided, even for employees that are out of the CBA there are legal requirements that apply and should be considered. Legal requirements should be explored at national level, to see what are the requirements for personnel that are out of the CBA system.</p> |

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|    | <p>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.</p>   |   |   |   |
| 16 | <p>2.5.3 Normal weekly working hours do not exceed 48 hours. Weekly overtime hours do not exceed 12 hours. and</p> <p>2.5.4 If additional overtime hours are necessary the following conditions are met:</p> <p>a) It only occurs for limited periods of time (eg. peak harvest, planting).</p> <p>b) Where there is a trade union or representative organization the overtime conditions are negotiated and agreed with that organization.</p> <p>c) Where there is no trade union or representative organization agreement the average working hours in the two-month period after the start of the exceptional period still do not exceed 60 hours per week.</p> | <p>Via its contact with farmer organizations in all parts of the world, we have learned that limiting overtime in agriculture is very difficult. Although the attempt to describe in detail under what conditions overtime is allowed is admirable, we suggest a more practical approach.</p> | <p>We consider it more important that workers can at all time determine for themselves whether or not they want to make more hours a day. Furthermore workers have to receive appropriate payment for this work. When these two conditions are met, it is probably not necessary to prescribe exactly under which conditions overtime is allowed.</p> | <p>See comment 14: Without modifications. Safety reasons. There are also legal requirements that have to be considered.</p> |

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| 17  | 2.5.9 If employees live on the farm, they have access to affordable and adequate housing, food and potable water. 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. | Question wording reduces the scope to only those employees who live on the farm, not all farm workers.                                      | We would like to have a discussion about increasing the scope to field work also. | <p>Discussion</p> <ul style="list-style-type: none"> <li>- Should the employer be requested to provide water, housing and food to all workers?</li> <li>- The group considers that water should be provided for all employees as long as they are in the farm, however food and housing are different matters.</li> </ul> <p><u>Conclusion:</u> new 2.5.9</p> <p>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.</p> |
| <b>Principle 3: Responsible Community relations</b> |  |   |   |   |
| 18  | <p>Principle 3: Responsible Community Relations</p> <p>Option 2: Inclusive Business Models: they are applied whenever possible, providing opportunities to stakeholders, strengthening social cohesion,</p>  | I don't really understand what you mean by this. This kind of seems obvious and part of normal business anyway (providing employment, etc.) | Please provide more examples in the guidance document                             | <p>Discussion:</p> <ul style="list-style-type: none"> <li>- The problem in Brazil is that the term "communities" is associated to family farming.</li> <li>- There are many requirements in the standard that are aligned with an Inclusive Business Model approach.</li> <li>- Many of these requirements are covered in</li> </ul>  |

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|    | economic prosperity and more sustainable business.  |   |   | 3.3.<br>- Risk of misinterpretation as a requirement.<br><br><u>Conclusion:</u> in order to avoid misinterpretation and to be considered as a mandatory requirement for producers, the note will be placed in the preamble. |
| 19 | Note: p3<br>Inclusive business models are applied whenever possible, providing opportunities to stakeholders, strengthening social cohesion, economic prosperity and more sustainable business. | We are worried that the term 'inclusive business models' is open for interpretation and that it is unclear how this concept can be translated into practical actions specifically in soy production | We advice to add this term to the Guidance table and to the Glossary of Terms and make very concrete what soy farmers could do to include smallholders or members of the local community.   | <u>Conclusion:</u> in order to avoid misinterpretation and to be considered as a mandatory requirement for producers, the note will be placed in the preamble.  |
| 20 | Preamble<br>Inclusive Business Model  | Is not clear this option here. If it is a new requirement it should be at principle 3   | Delete it from the preamble and move it to principle 3 (Option 2)   | <u>Conclusion:</u> in order to avoid misinterpretation and to be considered as a mandatory requirement for producers, the note will be placed in the preamble.  |
| 21 | 3.1.1 Documented evidence of communication channels and dialogue is available.  | It is not so clear what is meant exactly. It is unlikely that there is documented evidence of the 'informal' contact between the producers and its neighbors.                                       | Maybe rather than referring to documented evidence on communication channels and dialogue, this can be left to the auditor. He can, via interviews in the community, review whether the farmer is indeed accessible for questions, complaints, suggestions or comments. | Discussion<br>The indicator is clear enough<br>There is already an exception for small producers.<br><br><u>Conclusion:</u> Without modifications.  |
| 22 | 3.1.2 The channels adequately enable communication between  | How gender equity is ensured  | Specific training programmes organized for women to enhance   | Discussion  |

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|    | the producer and the community. |   | their capacities and participation in decision making in soy farming   | <ul style="list-style-type: none"> <li>- This could be a problem in India.</li> <li>- Some producers don't have the opportunity to have women working for them.</li> <li>- Putting something like this as a mandatory requirement could be hard to fulfill.</li> <li>- The trainings should be the same and open for everyone.</li> <li>- There should be an specific training for them since they should be stimulated.</li> <li>- Make it only applicable for bigger producers. (What is a big producer?, define at NI level)</li> <li>- Add in the guidance that this should be addressed in the NI.</li> </ul> <p>The auditor should ask for this in order to stimulate it.</p> <p><u>Conclusion:</u><br/>Change the title of 3.4<br/>Fair opportunities for employment and provision of goods and services are given to the local population <b>no matter the gender or race.</b></p> |
| 23 | No Related indicator            | Food security and clean drinking water availability is not included in the impact assessment. | <p>Include a new indicator:<br/>Impacts on food security and drinking water availability are assessed prior to any significant intensification or expansion of cultivation or infrastructure.<br/>Negatives impacts are mitigated.</p> | <p>Discussion</p> <ul style="list-style-type: none"> <li>- Should this be addressed in the principle 3? This should be part of principle 4.</li> <li>- Are these requirements not covered in other indicators like 1.3.1?</li> <li>- See the impact of expansion.</li> </ul> <p>4.1.1 An initial social and environmental assessment is carried out prior the first audit. (take out "of large infrastructure" with a general assessment.</p> <ul style="list-style-type: none"> <li>- Group certification: The group manager is</li> </ul>  |

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|  |  |  |  | <p>the responsible for this.</p> <ul style="list-style-type: none"> <li>- 4.1.1 is already inside the 1.3.1. It is not an extra assessment. It is covered.</li> </ul> <p><u>Conclusion 1</u>: new 4.1.1<br/>An initial social and environmental assessment is carried out prior to the first audit (see indicator 1.3.1).</p> <p>Regarding the suggestion related to WATER AVAILABILITY ASSESSMENT</p> <ul style="list-style-type: none"> <li>- 1.3 the producer will be aware of the social impact.</li> <li>- The standard also provides lots of mechanism to address social or environmental problems or community problems in other indicators.</li> <li>- The concept of food security is complex to understand, to define and to assess.</li> <li>- This is connected to a lot of other issues.</li> </ul> <p><u>Conclusion 2</u><br/>Final 4.1.1 An initial social and environmental assessment is carried out prior to the first audit (see indicator 1.3).<br/>4.1.4 Measures to minimize or mitigate the impacts identified by the assessment are documented and are being implemented and monitored.<br/>Note for group certification of small farmers all 4.1.1, 4.1.2, 4.1.3 and 4.1.4 can be implemented at group manager level<br/>Add guidance: in case of group certification of small producers. The</p> |
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|    |  |   |  | different groups located in the similar areas with similar problems can exchange information in order to prepare and/or carry out the assessment, however the report should be prepared at group level.  |
| 24 | 3.2 In areas with traditional land users, conflicting land uses are avoided or resolved. | The right of indigenous people and the respect of the ILO Convention 169 is only mentioned in the Guidance to the criterion 3.2 and under the ESIA Assessment criteria 4.3.1 - this doesn't reflect enough the importance of respecting indigenous rights and the convention. | Include a new indicator 3.2.3 Producers are required to respect the rights, customs and culture of indigenous peoples as defined in the UN Declaration on the Rights of Indigenous Peoples (2007) and ILO Convention 169 (1989). | Discussion<br>- It is already included in others standards like FSC (without ILO Conventions).<br>- How can this be added in the checklist? It is already being checked.<br>- 3.2.1 and 3.2.2 already cover this but it can be added as a new indicator.<br><u>Conclusion:</u> new indicator 3.2.3<br>"Producers are required to respect the rights, customs and culture of indigenous peoples as defined in the UN Declaration on the Rights of Indigenous Peoples (2007) and ILO Convention 169 (1989)." |
| 25 | 3.2 In areas with traditional land users, conflicting land uses are avoided or resolved. | The right of indigenous people and the respect of the ILO Convention 169 is only mentioned in the Guidance to the criterion 3.2 and under the ESIA Assessment criteria 4.3.1 - this doesn't reflect enough the importance of respecting indigenous rights and the convention. | Include a new indicator 3.2.3 Producers are required to respect the rights, customs and culture of indigenous peoples as defined in the UN Declaration on the Rights of Indigenous Peoples (2007) and ILO Convention 169 (1989). | See comment 24   |
| 26 | 3.2 In areas with traditional land users, conflicting land uses are avoided or resolved. | The right of indigenous people and the respect of the ILO Convention 169 is only mentioned in the Guidance to the criterion 3.2 and under the ESIA Assessment criteria 4.3.1 - this doesn't reflect enough the importance of respecting indigenous rights and the convention. | Include a new indicator 3.2.3 Producers are required to respect the rights, customs and culture of indigenous peoples as defined in the UN Declaration on the Rights of Indigenous Peoples (2007) and ILO Convention 169 (1989). | See comment 24   |

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|    | avoided or resolved.  | mentioned in the Guidance to the criterion 3.2 and under the ESIA Assessment criteria 4.3.1 - this doesn't reflect enough the importance of respecting indigenous rights and the convention.  | of indigenous peoples as defined in the UN Declaration on the Rights of Indigenous Peoples (2007) and ILO Convention 169 (1989).  |  |
| 27 | <p>3.2 In areas with traditional land users, conflicting land uses are avoided or resolved.</p> <p>3.2.1 In the case of disputed use rights, a comprehensive, participatory and documented community rights assessment is carried out.</p> <p>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> <p>Guidance 3.2</p> <p>When applying for certification the producer will identify</p> | <p>The criterion refers only to land users rights. At least in Spanish version this excludes access to water and water resources rights, including the availability of water downstream the farm limits. The criteria should also include cultural uses</p> | <p>-To change the wording as follow:<br/>In areas with traditional territory users, conflicting in farm or out farm uses are avoided or resolved.</p> <p>Discussion<br/>Proposal: to adapt the Annex 1 Guidance in accordance, specifying the reference to: access to water, water resources, cultural and religious significant sites and downstream/out farm effects.</p> | <p>Discussion<br/>It is impossible to require that out-farm conflicts are avoided or resolved. This cannot be the responsibility of the producers.</p> <p><u>Conclusion:</u><br/>Include in the annex 1 for guidance 3.2 that the community right assessment should aim to "identify water resources".</p> |

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|    | <p>traditional land users. Traditional land users will provide reasonable proof that they have been exercising use or access rights on the area of the property over the 10 years prior to May 2009 (the ‘cut-off date’). In the case of traditional indigenous communities, articles 14-18 of ILO convention 169 also apply.</p> |   |  |   |
| 28 | <p>Guidance<br/>3.3.3 If the producer receives compliance, he/she is required to send an answer within 30 days of receiving the complaint to start addressing the issue.</p>  | <p>This is already well described in the original, and not necessary to include a deadline.</p>   | <p>Leave it as is:<br/>3.3.3 Any complaints and grievances received are adequately dealt with in a timely manner</p>   | <p>Discussion<br/>- Every complaint must have an answer. - 30 days as it was proposed, ensures that the complaint will be answered.<br/>- What the group meant by suggesting this, was that the producer must at least provide feedback of the reception of the complaint within 30 days, not to solve it in 30 days. May be a clarification is needed.</p> <p>Conclusion:<br/>To add in indicators: <b>To provide feedback of the reception of the complaint and/or</b> to start addressing the issue.</p> |
| 29 | <p>3.4.1: Employment opportunities are made known locally</p>   | <p>FEFAC believes that the farmer, as an independent entrepreneur, should be able to decide for him or herself whom to hire. In practice local people will often be the logical choice.</p> | <p>It is likely that producers will hire local people. However, producers should be free to determine whom to hire. Therefore we propose to leave this indicator out. Another option is to make a ‘tool box’</p> | <p>Discussion<br/>The standard does not force the producers to hire locally. It is a normal practice for the producers to look for local people. This is also aligned to the Inclusive Business Model approach considered in the</p>  |

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|    |   |  | about inclusive business models (giving practical examples on how the local community can be involved) and let the farmer decide which tools from that tool box are applicable and relevant in his/her situation. | preamble.<br><br>Conclusion: Without modifications.   |
| 30 | 3.4.1 Employment opportunities are made known locally.<br>Note: Not applicable for small farms.<br>3.4.3 Opportunities for supply of goods and services are offered to the local population.<br>Note: Not applicable for small farms. | There is no reason for small farms to not fulfill this requirement   | To delete the notes excepting small farms on these indicators   | Discussion<br>It was agreed to take out the notes.<br><u>Conclusion:</u> delete the notes   |
| 31 | 3.4.2: There is collaboration with training programs for the local population   | Although we understand the benefits of possible cooperation with local training programs, it is not always possible and relevant.  | We would suggest to mention this option as an example of ‘inclusive business models’ (see previous remark on tool box) and let the farmer decide if and how this can be applicable to his/her situation.          | Discussion<br>It is not always possible to carry out such trainings.<br><u>Conclusion:</u> to add <b>if possible</b> to indicator 3.4.2 |
| 32 | 3.4.3: Opportunities for supply of goods and services are offered to the local population   | Like the example with local employment, FEFAC considers it the freedom of the entrepreneur to decide from whom to buy its inputs. In practice local suppliers will be a preferred option in terms of transport and | We would suggest to mention this option as an example of ‘inclusive business models’ (remark on tool box) and let the farmer decide if and how this can be applicable to his/her situation.                       | See comment 29  |

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|    |  | transaction costs.   |   |  |
| 33 | No related indicator   | Protection of cultural and religious significant sites in the management unit is not covered.      | Include a new criterion (+ indicators): Cultural and religious significant sites in the management unit are identified and protected. | <p>Discussion</p> <p>It is proposed to use the wording of FSC in this regard.</p> <p><u>Conclusion:</u> New indicator 3.2.4: Sites of special cultural, ecological, economic or religious significance to indigenous people shall be clearly identified in cooperation with such people, and recognized and protected by farm managers.</p>  |
|    | <b>Principle 4: Environmental Responsibility</b>   |  |   |  |
| 34 | 4.1 On and off site social and environmental impacts of large or high risk new infrastructure have been assessed and appropriate measures taken to minimize and mitigate any negative impacts. | No public reporting is required of impact assessment.<br>No monitoring and evaluation is required. | Include a indicator on public reporting.<br>Change 4.1.4. to include monitoring and evaluation  | <p>Discussion</p> <p>This discussion is around the new 4.1.1 that have replaced the old 4.1.1<br/>“An initial social and environmental assessment is carried out prior to the establishment first audit (see indicator 1.3.1).”</p> <ul style="list-style-type: none"> <li>- A farmer won’t provide sensitive information.</li> <li>- The report after the audit is available, which contains even more information than the information required as mandatory.</li> </ul> <p><u>Conclusion:</u> create a new indicator 4.1.5: A summary of the assessment shall be available at request.<br/>This can be done at group level for group certification of small farms</p> |

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| 35 | <p>4.1 On and off site social and environmental impacts of large or high risk new infrastructure have been assessed and appropriate measures taken to minimize and mitigate any negative impacts.</p> <p>4.1.3 The assessment is carried out in a comprehensive and transparent manner.</p>  | No public reporting is required of impact assessment.                               |  |   |
| 36 | <p>4.1.1 A social and environmental assessment is carried out prior to the establishment of large or high risk new infrastructure.</p> <p>4.1.2 The assessment is carried out by someone who is adequately trained and experienced for this task.</p> <p>4.1.3 The assessment is carried out in a comprehensive and transparent manner.</p> <p>4.1.4 Measures to minimize or mitigate the impacts identified by the assessment are documented and are being implemented.</p> | At a single ICS it requires more resources and it is not possible for all producers | Should be done by Group of ICS jointly, it may be done region wise-sample basis, so that cost can be reduced and managed by group managers jointly | <p>Discussion</p> <p>The group does not agree with the proposal. Who will be responsible for the group of groups? Different regions? Different groups can share information and resources for the assessment, but the reports should be prepared individually.</p> <p><u>Conclusion:</u> The report should be at group level.</p> <p>New guidance: Group certifications can share information that is social and environmental relevant but the report is at group level.</p> |

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|    | Note: For group certification – this also applies to large new infrastructure projects developed by the entity holding the group certificate, where the infrastructure is used by certified group members or the certified soy they produce |   |  |  |
| 37 | 4.2.2 There is adequate storage and disposal of fuel, batteries, tires, lubricants, sewage and other waste.   | The definition of adequate storage is unclear |  | <p>Discussion:</p> <p>This is not defined and it is left to the auditor ‘s criteria.</p> <p>- Should the NI address this? They already include this in their national legislation?</p> <p>- Should this be added in the guidance? Yes, and for every type of product. (what is adequate storage...)</p> <p><u>Conclusion:</u> add in annex 6: Guidance for NI:</p> <p>4.2.2 It is required that the NTG defines what adequate storage and disposal of the elements listed in 4.2.2 mean.</p> |
| 38 | 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.   | Not possible at producer level                |  | <p>May be addressed by the group manager under the ICSs.</p> <p><u>Conclusion:</u> Add that for group certification of small farmers, this could be part of the ICS.</p>   |
|    | If there is an increase in the intensity of fossil fuel used,   |   |  |  |

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|  | there is a justification for this. If no justification is available there is an action plan to reduce use.   |   |   |   |
| 39   | 4.3.4 Opportunities for increasing carbon sequestration through restoration of native vegetation, forest plantations and other means are identified. | No measure required.  | Opportunities for increasing carbon sequestration through restoration of native vegetation, forest plantations and other means are identified “and implemented”                                       | <p>Discussion</p> <ul style="list-style-type: none"> <li>- Implementation should be considered.</li> <li>- For producers is complicated. It should not be mandatory.</li> <li>- Not always it is possible to implement all options.</li> <li>- It is more important to address the issue of soil organic matter in the soil related indicators.</li> <li>- The indicator 4.3.3 should be reviewed. The requirement to only maintain the soil organic matter is not enough.</li> </ul> <p><u>Conclusion 1:</u> in indicator 4.3.4 Add “and when possible implemented”</p> <p><u>Conclusion 2:</u> New proposal from the group 4.3.3: Soil organic matter is monitored to quantify change in soil carbon and steps are taken to “improve it or at least to mitigate negative trends”.</p> |
| <b>For comments regarding 4.4 See: Sub - Annex 2 at the end of this annex.</b> |  |   |   |   |
| 40   | 4.5.1 There is a map of the farm which shows the native vegetation, productive areas and water courses (see 5.2.1)                                   | If there are watercourses or lakes on the farm they have to be on the map | <p>4.5.1 There is a map of the farm which shows the native vegetation, waterbodies (if present) and productive areas.</p> <p>Note: ‘Water bodies’ includes, but is not limited to, water courses,</p> | <p>Discussion: this is already covered in 5.2.1</p> <p><u>Conclusion:</u> Add water courses (and add a note saying that this is included in the indicator 5.2.1)</p>  |

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|    |  |   | intermittent rivers, rivers, streams, lagoons, springs, lakes, reservoirs and ditches (see glossary)  |  |
| 41 | <p>4.5 On-farm biodiversity is maintained and safeguarded through the preservation of native vegetation.</p> <p>4.5.2 There is a plan, which is being implemented, to ensure that the native vegetation is being maintained (except areas covered under Criterion 4.4)</p> | <p>Due to the use of temporary rental or campaigns contracts it is not possible always to have a maintenance plan for native vegetation in the middle and/or long term.</p> | <p>While it is possible to check the state of biodiversity in the moment, it should not be considered mandatory to prepare a restoration plan when there is no continuity in the use of the land.</p> | <p>Discussion:</p> <ul style="list-style-type: none"> <li>- The Accreditation and Certification requirements state very clearly that the unit of certification is the whole farm, even if only the productive area is rented.</li> <li>- This is key for RTRS' credibility, otherwise with this approach a producer could be certified in a farm where there is child labour, where deforestation exists but not in the part that they certify.</li> <li>- A restoration plan must be carried out.</li> </ul> <p>The producer not only rent the productive area in certification terms the whole farm is rented.</p> <ul style="list-style-type: none"> <li>- The producer is responsible for the whole land even if it hasn't been rent.</li> <li>- This requirement is not clear for producers as this requirement of the unit of certification is in another document and not in the Standard.</li> </ul> <p><u>Conclusion 1:</u> if the producer that is renting the farm does not want to prepare the restoration plan, then the owner of the farm shall has such a plan. The certification is for the whole farm.</p> <p><u>Conclusion 2:</u> Unit of certification will be added in the standard to avoid any misinterpretations.</p> |

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| 42 | <p>4.5 On-farm biodiversity is maintained and safeguarded through the preservation of native vegetation and wildlife.</p> <p>4.5.1 There is a map of the farm which shows the native vegetation.</p> <p>4.5.2 There is a plan, which is being implemented, to ensure that the native vegetation is being maintained (except areas covered under Criterion 4.4)</p> <p>4.5.3 No hunting of rare, threatened or endangered species takes place on the property.</p> | <p>There are no measures on how to identify, protect and manage on farm biodiversity, including native vegetation and wildlife, actively on the farm level.</p> <p>No monitoring and evaluation is required</p> <p>There is no requirement about a farm area reserved for native ecosystem.</p> | <p>Include “wildlife” in the Criteria.</p> <p>- Change 4.5.2 to the following: “There is a plan, which is being implemented AND MONITORED, to ensure that the native vegetation is being maintained (except areas where Criterion 4.4 allows for conversion);</p> <p>- Include 4.5.4 (or a guidance on 4.5.2 but better a new indicator): The plan needs to include how the identification, protection and management of native vegetation, wildlife and biodiversity in general is developed on farm level, as well as monitoring and evaluation.</p> | <p>Discussion</p> <ul style="list-style-type: none"> <li>- The word “developed” should be replaced by “maintained”.</li> <li>- There is an issue of interpretation of the word “identification” that could lead to the idea that farmers are requested to do an inventory of species.</li> </ul> <p><u>Conclusion 1:</u> to add a guidance with the wording proposed replacing “developed” by maintained”</p> <p><u>Conclusion 2:</u> It is proposed to create a sub-group that works on guidance on how this plan can be developed specially considering guidance to do this identification without high cost or specialized assessors that could increase the costs and complexity of the certification. The deadline to present the content of this guidance to the group coordinator is beginning of February. The sub-group will be formed by representatives from Proyungas, Fundación Vida Silvestre and Bartira.</p> |
| 43 | <p>4.5.2 There is a plan, which is being implemented, to ensure that the native vegetation is being maintained (except areas covered under Criterion 4.4)</p>   | <p>There are no measures on how to identify, protect and manage on farm biodiversity, including native vegetation and wildlife, actively on the farm level.</p> <p>No monitoring and evaluation is required</p> <p>There is no requirement</p>  | <p>Change to the following:</p> <p>4.5.2 “There is a plan, which is being implemented and monitored, to ensure that the native vegetation and wildlife is being maintained (except areas where Criterion 4.4 allows for conversion);</p> <p>- Include a guidance on 4.5.2:</p>   | <p>Discussion, for the two first proposals see comment 42</p> <p>For the last proposal (10% of the farm area)</p> <p>Discussion</p> <ul style="list-style-type: none"> <li>- Is this doable?</li> <li>- That is only for consolidated regions with almost no native vegetation.</li> </ul>   |

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|  |  | <p>about a farm area reserved for native ecosystem.</p> | <p>The plan needs to include how the identification, protection and management of native vegetation, wildlife and biodiversity in general is developed on farm level, as well as monitoring and evaluation.</p> <ul style="list-style-type: none"> <li>- Include a new indicator 4.5.x: 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 reserve at least 10% of the farm area to be restored as native vegetation in order to promote wildlife and provide ecosystems services.</li> </ul> | <ul style="list-style-type: none"> <li>- Requesting restoration through the restoration of border fences and micro corridors could be positive.</li> <li>- Criteria are needed to implement this.</li> <li>- This applies to producers that have less than 10% of native vegetation at farm level, but that comply with 4.4 and other indicators.</li> <li>- This is already legally required in Brazil, is it possible to do it in other countries where this is not legally required?</li> <li>- If the producer cannot support restoration in his own farm, it could support other activities that support native vegetation restoration in the same region.</li> <li>- The producer can give resources to a fund instead of lose productive lands.</li> <li>- Create a compensation mechanism: If a producer have less than 10% and wont reforest, the producer can support restoration activities through compensation mechanism (conservation, support NGO for example).</li> </ul> <p><u>Conclusion 1:</u> Include a new indicator 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 carry out conservation activities in or out of the farm in order to promote wildlife and restoration of native vegetation.</p> <p><u>Conclusion 2:</u> add a Guidance for 4.5.4 Activities that could be carried out by</p> |
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|   |   |   |  | producers to comply with this indicator are for example, but not limited to, the following: to leave corridors or restoration of borders of fences or paths, restoration of degraded or unproductive areas, support of conservation or restorations activities outside the boundaries of the farm (but related to the local wildlife and native vegetation). This support cannot only be done with funds but also providing people, other resources, etc. |
| 44                                      | 4.5.3 There is no hunting of rare or endangered species on the property.          | No hunting  | Suggested text:<br>4.5.3 No hunting of any kind occurs on the property, except of species that are breeding in an unbalanced fashion and jeopardizing food production. | Discussion<br>- If the government formally informs it, some species can be hunted.<br>- If the sport hunting is legal, it can be allowed.<br>- If we change the indicator as it was proposed we need to start making exceptions for situations like valid permits, etc, therefore it is considered that the priority is to protect rare or endangered species.<br><u>Conclusion:</u> leave the indicator as it is, the priority is clear.                 |
| Principle 5: Good Agriculture Practices |   |   |  |   |
| 45                                      | 5.1 The quality and supply of surface and ground water is maintained or improved. | It is quite hard to determine ground water contamination. The studies that involve sampling this ground water are very costly, the ground water that surrounds the area has to be identify first, then it | Fields with less of 2000 ha cannot produce water contamination. This requirements should be only applicable to farms with more than 2000 ha.                           | Discussion<br>This is no scientific information, or any reference to some study that can confirm this proposal.<br>If there are bad practices or an accident it does not matter the size of the farm, it can produce water ground contamination.  |

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|    |   | is necessary to identify where they are located in the farm, analyze the slope ect.   |  | <u>Conclusion:</u> It is necessary for good practises and it is not costly. Leave the indicator as it is.   |
| 46 | 5.1.2 The producer is required to carry out a water quality risk assessment.<br>(There is a plan that includes monitoring and mitigation measures according to the risk assessment and applicable to the scale that demonstrates that the applied practices are effective.) | Unclear definition of water quality risk assessment.<br><br>We must observe several provincial and federal laws in place to protect both surface and groundwater.<br>These include but are not limited to:<br><br>Canada Water Act<br>Canada Water Rights<br>Ontario Clean Water Act (Provincial)<br>Ontario Safe Drinking Water Act (Provincial)<br><br>As an example, I received a package from the <u>Ausable Bayfield Maitland Valley Drinking Water Source Protection Region, (an additional local organization)</u> informing us of the work they are doing, maps which indicate our proximity to the river, and a list of things to do to “help keep drinking water clean”. Testing the water, or doing our own water quality risk assessment, | I am not sure if this indicator would land on the Canadian NI of the Standard or not.<br>I would propose not adding it. I believe it would be redundant, considering existing legislation. | <u>Discussion:</u><br>- Yes, this would affect Canadian NI because this is part of the generic Standard.<br>- The intention of the group was to facilitate to producers the water sampling requirements, but it seems that the indicator has created more complications.<br>- With this indicator and the new guidance (at facility level) the oficial information is not allowed.<br>- Every test must be carried out by the producer.<br>- One option is to request this for countries where there is not enough or robust legislation about this.<br>- The other option is to leave it as it was.<br><br><u>Conclusion:</u><br>Eliminate 5.1.2<br>5.1.3 take out the risk assessment<br>New wording for new 5.1.2 :“There is a plan that includes monitoring and mitigation measures according to the identified risks and applicable to the scale.” |

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|    |   | was not on that list. That work is done regularly by organizations such as the ones previously mentioned.  |   |                |
| 47 | 5.1.2 The producer is required to carry out a water quality risk assessment.<br>(There is a plan that includes monitoring and mitigation measures according to the risk assessment and applicable to the scale that demonstrates that the applied practices are effective.) | <p>What is a water quality risk assessment? What is required for this?</p> <p>Currently, a number of pieces of legislation exist in Canada to limit risk to both surface and groundwater. These include:</p> <p>Canada Water Act (R.S.C. 1985, c. C-11) Canada Water Rights Act (C.C.S.M. c. W80) Manitoba Drinking Water Safety Act (C.C.S.M. D101) Manitoba Ground Water and Well Water Act (C.C.S.M. c. G110) Manitoba Water Protection Act (C.C.S.M c. W65) Manitoba Water Resources Conservation Act (S.M. 2000, c. 11(C.C.S.M. W72)) Ontario Clean Water Act, 2006 (S.O. 2006, c. 22) Ontario Drainage Act (R.S.O 1990, c. D.17) Ontario Water Resources Act (R.S.O 1990, c. O.40) Ontario Safe Drinking Water Act, 2002</p> | <p>Further explanation is needed as to what is required for water quality risk assessment.</p> <p>As Canada has a number of ways to limit water quality risk through legislation and water quality monitoring exists. In a Canadian context, this would be redundant and place significantly more burden on the farmer, if in fact water quality risk assessment was forced to be carried out by the producer. We must be mindful that farmers already have a large workload and water quality risk assessment would increase this.</p> | See comment 46 |

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|    |   | <p>(S.O. 2002, c 32) Prince Edward Island Water and Sewerage Act, 2002<br/> (R.S.P.E.I. 1988, c. U-5) Quebec Watercourses Act<br/> (R.S.Q. c. R-13)</p> <p>Furthermore, Conservation Authorities (CA's) administer water quality monitoring throughout Ontario which is a proactive process to assess water quality risks for both surface and groundwater.</p>   |   |                |
| 48 | 5.1.2 The producer is required to carry out a water quality assessment. | <p>This is another burden for the producer, without clear additional environmental benefit. Especially when you can argue about who is going to do this quality risk assessment, depending on the auditor this can be very expensive indeed. Just to remember the costs of a HVCA assessment for 2 farms in Brazil was over EUR 120.000,00, because just one person was accredited to do so. The issue has been covered already in the 5.1.1 indicator.</p> | Take out the indicator 5.1.2                                | See comment 46 |
| 49 | Guidance  | This will be another burden for the producers, and a  | Take out the suggestion:<br>Monitoring should be considered | Discussion     |

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|    | <p>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 facility level.</p> <p>For example, in the case of a stream running through a property, the producer could establish sample stations at points of entry and exit of the river, which would give clarity on the contribution of the establishment.</p> | <p>costly one, as these suggested analysis are expensive. The additional environmental benefits are not apparent. Moreover, it is not clear what will happen if a farm is cut by a polluted river, and the origin of the pollution is NOT the farm activities.</p>       | <p>at.....</p>   | <p>With this guidance producers cannot use official information.</p> <p><u>Conclusion:</u> Guidance 5.1.2: take this guidance out. It will be “carried out at watershed level”</p> |
| 50 | <p>5.1.2 The producer is required to carry out a water quality risk assessment.</p> <p>Note: For group certification of small producers the risk analysis could be undertaken by the group manager</p> <p>5.1.3 There is a plan that includes monitoring and mitigation measures according to the risk assessment and applicable to the scale that demonstrates that the applied practices are effective.</p>                                  | <p>The present proposal bears the risk that the water risk evaluation is too demanding and expensive for a single farmer and therefore needs clarification. Monitoring, if at all should be limited to the parameters explicitly mentioned in 5.1.2 of the Guidance.</p> | <p>5.1.2 The producer is required to carry out a <b>appropriate</b> water quality risk <b>evaluation</b>.</p> <p>5.1.3 There is a plan that includes ( eliminate: monitoring and) mitigation measures according to the risk assessment and applicable to the scale that demonstrates that the applied practices are effective.</p> <p>Annex 1 – Guidance</p> <p>5.1.2 Where appropriate there should be monitoring of parameters such as pH,</p> | <p>See comments 46 &amp; 49</p>  |

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|    |   |  | temperature, dissolved oxygen, turbidity and electrical conductivity. <b>As a principle, a monitoring will not be required if a sufficient water risk evaluation and appropriate implementation of measures has been carried out</b> . Monitoring, if at all, should be considered at facility level. For example, in the case of a stream running through a property, the producer could establish sampling stations at points of entry and exit of the river, which would give clarity on the contribution of the establishment. |  |
| 51 | 5.1.3 There is a plan that includes monitoring and mitigation measures according to the risk assessment and applicable to the scale that demonstrates that the applied practices are effective. | This is another burden – and potentially considerable costs - for the producer, without clear additional environmental benefit | Take out 5.1.3   | See comment 46   |
| 52 | 5.1.5 (former 5.1.4)  | the wording “where it exists” counteracts the intention of the sentence.   | Delete “(where it exists)”<br>New version: Where irrigation is used, there is a documented procedure in place for applying best practices and acting according to legislation and best practice guidance   | <u>Conclusion:</u> Proposal accepted<br>Take out “Best practice guidance as well” for a better understanding of the indicator. |
| 53 | 5.2.1 The location of all   | It is difficult at producer  | Group manager/ICS can  | <u>Conclusion:</u> in order to be consistent with  |

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|    | <p>watercourses has been identified and mapped, including the status of the riparian vegetation.</p> <p>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.</p> <p>5.2.3 Natural wetlands are not drained and native vegetation is maintained.</p> | level   | manage this in collaboration of local authorities   | 4.5 (maps requirements and plan) that is also linked to 5.2. the same guidance applied “ In group certification of small farmers the group manager can maintain the map centrally and can be responsible for maintaining and developing a plan for restoration” |
| 54 | <p>5.2 Natural vegetation areas around springs and along natural watercourses are maintained or re-established.</p> <p>5.2.3 Natural wetlands are not drained and native vegetation is maintained.</p>   | Analyze the case of production sites by lease and cases when the water channel have been already built by field owners to drain lowlands that do not fall under the definition of wetlands. In these cases there is not always supporting documentation to justify the channeling | Define clearly if this situation excludes a site for certification  | Conclusion: Yes, there is a cut-off date May 2009 in the guidance   |
| 55 | Annex 1 Guidance<br>5.2.3 cut off date for natural wetlands is May 2009  | Recall that the cut-off date for biodiesel for EU under RED remains with January 2008   | How/when will the RTRS-RED document be updated and informed to the EC?  | <b><u>Conclusion: Out of scope other document. RTRS annex for Biofuels Production.</u></b>  |
| 56 | 5.3 Soil quality is maintained or improved and erosion is avoided by good management practices and 5.4 Negative environmental and health impacts of phytosanitary products are reduced by implementation of systematic, recognized   | There is no indicator/criteria which refers to crop rotation which is either good to maintain soil quality and as well to avoid any negative environmental and health impacts   | <p>Include a new criteria: 5.12 Crop rotation and crop diversity is implemented in the management unit.</p> <p>Indicator:<br/>5.12.1 There should not be soy planted over soy and there must be a gap between 2 soy</p> | Conclusion: This comment was already addressed during the first meeting. It was proposed by one of the members of the WG.   |

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|    | Integrated Crop Management (ICM) techniques   |   | plantations in the same field. During this gap, a second crop or pasture should be cultivated or at least there should be regeneration of wild vegetation.<br>5.12.2 There is no fellow land between soy cultivation.   |  |
| 57 | 5.3.1 Knowledge of techniques to maintain soil quality (physical, chemical and biological) is demonstrated and these techniques are implemented.<br>5.3.2 Knowledge of techniques to control soil erosion is demonstrated and these techniques are implemented. | <p>Justification :The two criteria 5.3.1.1 and 5.3.2 were overlapping.</p> <p>The clear adoption of Conservation Agriculture as a norm after 2021 assists soybean producers to gradually adopt the most sustainable production system available today.</p> <p>This system has proven benefits to yields through :</p> <ul style="list-style-type: none"> <li>-Almost eliminating erosion;</li> <li>- Drought alleviation through reduced soil evaporation and improved rainfall absorption by soil;</li> <li>- Improved internal drainage and root aeration;</li> <li>- Increased fertilizer</li> </ul> | <p>Combine 5.3.1 with 5.3.2</p> <p><u>Revised 5.3.1 (including 5.3.2).</u> Knowledge of techniques to maintain soil quality (physical, chemical and biological) <b>and specifically to avoid soil erosion and pollution</b>, is demonstrated and these techniques are implemented <b>under the aegis of Conservation Agriculture, as defined by FAO, whose adoption should be obligatory by 2021.</b></p> <p><b>5.3.2 ELIMINATED</b> Knowledge of techniques to control soil erosion is demonstrated and these techniques are implemented.</p> <p><b>5.3.2 NEW (previous 5.3.3)</b> Appropriate monitoring, including soil organic matter content, is in place.</p> | <p>Discussion</p> <ul style="list-style-type: none"> <li>- The group proposed a new 5.3.1</li> <li>- Keep them separate because they are not the same. There are different measures for each one.</li> <li>- Obligatory by 2021? Could be a guidance but not mandatory. The standard should be applicable for all countries and soy production systems.</li> <li>- There is already a recommendation in the guidance for NI</li> </ul> <p><u>Conclusion:</u> move the guidance from 5.3 in annex 6 of the NI to the guidance of this indicator in annex 1.</p> |

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|    |   | <p>efficiency through reduced leaching and erosion losses and elevated cation exchange capacity;</p> <p>In fact conservation agriculture is increasing fast in India, Pakistan, China and other Asian countries and RTRS can materially assist farmers in improving their production process by CA adoption, which, in turn, stimulates certification, through higher yields</p> |   |   |
| 58 | 5.3.3 Appropriate monitoring, including soil organic matter content, is in place.   | Organic matter specification is redundant with indicator 4.3.3   |   | <p><u>Conclusion:</u> Change to:<br/>5.3.3 Appropriate monitoring of soil quality, including soy <b>fertility samples</b> is in place indicator 4.3.3.</p> <p>The 5.3.3 should be the new 5.3.1</p> |
| 59 | <p>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.</p> <p>5.4.2 There is an implemented plan that contains targets for reduction of potentially harmful phytosanitary products over time.</p> | The indicators 5.4.1, 5.4.2 and 5.4.4 are only “short term compliance indicator”   | These three indicators should be integrated in the “immediate compliance indicator”, which means in the 1 <sup>st</sup> year. | Conclusion: Out of scope this is a part of another document.  |

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|    | 5.4.4 Records of monitoring of pests, diseases, weeds and natural predators are maintained.  |   |   |   |
| 60 | <p>5.4.2 A plan has been implemented that includes goals for drift reduction on a term determined by potentially harmful phytosanitary products.</p> <p>5.4.3 Use of phytosanitary products follows legal requirements and professional recommendations (or, if professional recommendations are not available, manufacturer's recommendations) and includes active ingredient rotation to prevent resistance.</p> <p>5.9.1 There are documented procedures in place that specify adequate agricultural practices, including drift decrease, through the application of agrochemicals and such procedures are being implemented.</p> | <p>Our concern is focused on developing and using new technologies as a substitute/supplementary tool for coping with the appearance of an large amount of resistant weeds: e.g. the use of dicamba and 2,4d resistant varieties, that are a classified as having toxicological levels higher than those of glyphosate. Consequently, standards should assure preventing the glyphosate experience (its abuse, incorrect use and bad applications), as such varieties may generate similar or even more serious issues.</p> <p>And, on the other hand, it should be determined if non-volatility and drift of such new formulations is really assured, taking into account social issues as well as the border effect on other crops and forests</p> <p>This situation represents a</p> | <p>In this sense, companies shall encourage producers to implement a GAP system geared to good quality applications as a means for preventing "bad" applications and their negative impact, besides preventing legal issues. But, our view is that, according to GAP, such products should not be used, at least until the necessary research is done, that assures the quality of applications and the absence of undesired effects.</p> | <p>Discussion:</p> <ul style="list-style-type: none"> <li>- It is proposed the no use of the 24D as part of the good agricultural practices.</li> <li>- It is important to promote the appropriate use of the agrochemicals.</li> </ul> <p>To ban this agrochemical will not solve the problem.</p> <ul style="list-style-type: none"> <li>- Banning this agrochemical means to take out flexibility to producers.</li> </ul> <p><u>Conclusion;</u> This will be discussed in the Agrochemical section.</p> |

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|    |   | serious problem and a negative impact, not only at health level, but also in terms of forest and biodiversity conservation, through the border effect on corridors, patches, curtains and forests in general, besides the contamination of groundwater and waterways. Another issue derived from the (bad) use of such products is the impact on human health and on other crops where the damage produced by the drift effect may be high. |   |  |
| 61 | <p>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.</p> <p>5.4.2 There is an implemented plan that contains targets for reduction of potentially harmful phytosanitary products over time.</p> <p>5.4.4 Records of monitoring of pests, diseases, weeds and natural predators are maintained</p> | The above mentioned indicators are only “short term compliance indicator”   | These three indicators should be integrated in the “immediate compliance indicator”, which means in the 1 <sup>st</sup> year. | <b><u>Conclusion: Out of scope, this is part of another document</u></b> |

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|    | 5.4.5 There should not be soy planted immediately over soy and there must be a gap between 2 plantations in the same field. During this gap, a second crop or pasture should be cultivated or at least there should be a regeneration of wild vegetation. |   |  |   |
| 62 | 5.4.4 Records of monitoring of pests, diseases, weeds and natural predators are maintained  | It is difficult to keep records of natural predators at farmer level  | Records of monitoring of pests, diseases and weeds are maintained at producer level and natural predators are managed by group manager | <u>Conclusion:</u> add a note to allow this at group level for small producers.   |
| 63 | 5.4.5 There should not be soy planted immediately over soy and there must be a gap between 2 plantations in the same field. During this gap, a second crop or pasture should be cultivated or at least there should be a regeneration of wild vegetation. | I consider the language in the draft to be unclear. There are many reasons why growers would plant soybeans two years in a row, such as weather restrictions. | Do not add this indicator to NI. This doesn't appear to be an issue with Canadian agriculture.   | Discussion<br>- Monoculture is a real issue.<br>- The reality of rotation is different for each region. (weather conditions for example).<br>- Should this be mandatory?<br>- In South America, India, China can exist soy after soy. For cold places not (e.g. Canada).<br>- The RTRS should incentivize corn production.<br>- The group considers that the way the indicator is written should not represent a problem in Canada, as during winter there is a GAP that complies with this requirement.<br>- It could be an option to request a plan |

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|    |   |  |  | <p>that considers the weather and agro ecological conditions, so this kind of cases can be clarified and addressed in this plan.</p> <p><u>Conclusion rewording of 5.4.5:</u><br/> 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.<br/> 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.<br/> This plan shall consider adapting specific climate and agro-ecological regional conditions.</p> |
| 64 | <p>5.4.5 There should not be soy planted immediately over soy and there must be a gap between 2 plantations in the same field. During this gap, a second crop or pasture should be cultivated or at least there should be a regeneration of wild vegetation</p> | <p>This newly developed indicator needs further explanation.</p> <p>As in Canada, as we have a very limited growing season (April to September) soybeans cannot be grown immediately after soybeans in the same growing season.</p> <p>Most farmers work a proper crop rotation; however, in some situations farmers will grow soybeans in two consecutive growing seasons</p> | <p>This needs further clarity. In South American farmers may be able to grow two soybean crops out of one growing season but in Canada this is not possible. It is unjustifiable to penalize farmers who, for certain well thought out reasons chose to grow soybeans in consecutive growing seasons. Based on certain factors such as weather, markets etc. farmers will determine how a crop rotation will look.</p> <p>This indicator needs to be more thoroughly thought out as in</p> | <p>See comment 63</p>  |

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|    |  | but these will be in two separate years. It is unjustifiable to penalize a farmer for growing soybeans in two consecutive growing seasons as these decisions are made for a multitude of reasons. | some geographic regions this is a non-issue. We have been growing soybeans in Canada for over 30 years and diseases such as soybean rust that have become a problem in South America are a non-issue in Canada.   |  |
| 65 | 5.4.5 There should not be soy planted immediately over soy and there must be a gap between 2 plantations in the same field. During this gap, a second crop or pasture should be cultivated or at least there should be a regeneration of wild vegetation | This formulation may lead to confusion and could give way to millions of interpretations.   | It is important that a producer has adequate knowledge of crop rotation techniques and is actually implementing them. We don't have the answer at hand, but it should be formulated in such a way that it is relevant for all locations and not open to interpretation or leading to confusion. Either the guidance should be very clear or the formulation should be adjusted. | See comment 63   |
| 66 | 5.4.5 There should not be soy planted immediately over soy and there must be a gap between 2 plantations in the same field. During this gap, a second crop or pasture should be cultivated or at least there should be a regeneration of wild vegetation | This indicator is more related to soil quality than to phytosanitary impacts  | Move this indicator to Criteria 5.3   | <u>Conclusion:</u> the indicator was moved from 5.4.5 to 5.3.4 |

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| 67 | 5.5 All application of agrochemicals <sup>2</sup> is documented and all handling, storage, collection and disposal of chemical waste and empty containers, is monitored to ensure compliance with good practice.   | The word “agroquímico” in Spanish include phytosanitary products as well as fertilizers.  | Change agroquímico for phytosanitary products in the criteria and indicators 5.5.1, 5.5.2, and 5.5.3  | <p>Discussion</p> <p>In Portuguese “agroquímicos” don’t include fertilizers. There is footnote that clarifies this. The word phytosanitary refers to all chemicals used in the farm. It is already included in the standard.</p> <p><u>Conclusion:</u> for 5.4.3 use of agrochemicals (not phytosanitary) 5.4.3 without modifications. 5.5.5 without modifications.</p> |
| 68 | <p>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.</p> <p>5.5.2 Containers are properly stored, washed and disposed of; waste and residual agrochemicals are disposed in an environmentally appropriate way.</p> | It is not always possible to solve the problem of empty containers according to the legislation. Not always the resources proposed by the legislation are available and is not always possible to obtain an official certificate of final disposal. There are few operators authorized for the treatment of the empty containers and costs of the logistics for the treatment is very pricey and sometimes goes beyond the possibility of many producers. | Only in cases where the legislation related to the issue is workable and defines logical mechanism at the local level (municipal level), it should be required that the producer knows the traceability of the containers that provides to the operator or recycler. But it should not be mandatory to present the certificate of final disposal. ( the same situation occurs with the oils that are in disused). | <p>Discussion</p> <p>In Brazil is a legal requirement. If there is no legislation available good practices are follow.</p> <p><u>Conclusion:</u> indicator without modifications.</p>   |
| 69 | 5.5.2 Containers are properly  | Disposal is still problematic   |   | See conclusion comment 68   |

<sup>2</sup> Note: Agrochemicals refers to all chemicals used including fertilizers and pesticides

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|    | stored, washed and disposed of; waste and residual agrochemicals are disposed in an environmentally appropriate way. | in Argentina where there are inadequate receiving facilities. What did the working group propose to solve this? How will and auditor evaluate effectiveness against this criteria? |   |   |
| 70 | 5.6.1 There is no use of agrochemicals listed in the Stockholm and Rotterdam   | Include in the national interpretations the list of prohibited active ingredients or the ingredients with restricted use of SENASA (with periodic review)                          |   | <b><u>Out of the scope, this belongs to the NI of Argentina.</u></b>  |
| 71 | 5.6.1 There is no use of agrochemicals listed in the Stockholm and Rotterdam Conventions.                            | Extend the list of agrochemicals which should not to be used in RTRS certified farms.  | New 5.6.1: There is no use of agrochemicals listed in the Stockholm and Rotterdam Convention, WHO 1 a and b, WHO 2 and in the PAN international list of highly hazardous pesticides (recent version: <a href="http://www.pan-germany.org/download/PAN_HP_List_150602_F.pdf">http://www.pan-germany.org/download/PAN_HP_List_150602_F.pdf</a> ). | Discussion<br>- It was proposed to disregard completely this proposal.<br>- PAN cannot be considered an objective source of information many NGOs influence it.<br>- An option would be to consider the products list in WHO1. This is a serious source of information.<br>- The WHO list is not a list of banned products, rather a classification according their toxicity.<br>- Include WHO 1 (banned or as a recommendation to be used in specific situations).<br>- Include the most dangerous agrochemicals (from the WHO list) to reduce the use of them.<br>- Add new lists won't contribute to the sustainability, is only limiting the tools that |

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|    |   |   |  | <p>producers can use.</p> <p><u>Conclusion</u>, to create a new indicator 5.6.4 The use of products in the list WHO with classification 1a and 1b should be controlled, if possible reduced according an ICM plan developed by the producer, which explains on what specific circumstances the use of this products is allowed.</p> |
| 72 | 5.6.1 There is no use of agrochemicals listed in the Stockholm and Rotterdam Conventions. | Extend the list of agrochemicals which should not to be used in RTRS certified farms. | New 5.6.1:<br>There is no use of agrochemicals listed in the Stockholm and Rotterdam Convention, WHO 1 a and b, WHO 2 and in the PAN international list of highly hazardous pesticides (recent version: <a href="http://www.pan-germany.org/download/PAN_HP_List_150602_F.pdf">http://www.pan-germany.org/download/PAN_HP_List_150602_F.pdf</a> ). | See discussion and conclusion comment 71  |
| 73 | 5.6.1 There is no use of agrochemicals listed in the Stockholm and Rotterdam Conventions. | Extend the list of agrochemicals which should not to be used in RTRS certified farms. | New 5.6.1:<br>There is no use of agrochemicals listed in the Stockholm and Rotterdam Convention, WHO 1 a and b, WHO 2 and in the PAN international list of highly hazardous pesticides (recent version: <a href="http://www.pan-germany.org/download/PAN_HP_List_150602_F.pdf">http://www.pan-germany.org/download/PAN_HP_List_150602_F.pdf</a> ). | See discussion and conclusion comment 71  |

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| 74 | 5.6.1 There is no use of agrochemicals listed in the Stockholm and Rotterdam Conventions.   | Extend the list of agrochemicals which should not to be used in RTRS certified farms.  | New 5.6.1:<br>There is no use of agrochemicals listed in the Stockholm and Rotterdam Convention, WHO 1 a and b, WHO 2 and in the PAN international list of highly hazardous pesticides (recent version: <a href="http://www.pan-germany.org/download/PAN_HP_List_150602_F.pdf">http://www.pan-germany.org/download/PAN_HP_List_150602_F.pdf</a> ) | See discussion and conclusion in comment 71  |
| 75 | 5.6.1 There is no use of agrochemicals listed in the Stockholm and Rotterdam Conventions.   | The Rotterdam convention establishes an information duty. A product in this list may be registered in a specific country and there is no reason for a general ban.   | Delete "Rotterdam" from 5.6, 5.6.1 and Annex 6, 5.6   | See discussion and conclusion comment 71   |
| 76 | 5.6.2 Use of Paraquat and Carbofuran is eliminated by June 2017. <u>Note for 5.6.2:</u> In the Case of Paraquat, the deadline for the prohibition for its use by June 2017 could be extended by the RTRS if enough evidence is put forward before June 2016 to demonstrate that at the time there are still no alternatives in the market (globally or locally), that can substitute it with less environmental and human risks and with similar costs. | With the resistance to Glyphosate in more than 33 species of weeds globally, farmers cannot afford to loose tools such as Paraquat that we have been using for decades and that is a very good tool for NO-Till, Minimum Tillage systems due to the weed spectrum, mode of action,.... | Extend the revision of PQT beyond 2019 with the same Note 5.6.2 to review the extension at that time with the same criteria   | Discussion:<br><ul style="list-style-type: none"> <li>- The use of Paraquat is still necessary.</li> <li>- There is a mechanism in the note that provides RTRS members the opportunity to send evidence saying that it is still not possible to replace Paraquat fully with the available options in the market.</li> <li>- Evidence should be presented formally.</li> <li>- It is not clear in the note who is responsible for receiving this evidence.</li> <li>- The producers thought that the certification bodies were in charge of collecting this information.</li> <li>- Resistance is a cause of bad practices, not a product.</li> <li>- There are other products 24D, diquad (+cost, also dangerous)</li> <li>- Used in no-till (replaced partially by glyph).</li> </ul> |

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|  |  |  |  | <ul style="list-style-type: none"> <li>- Paraquat – there is no evidence that it causes resistance.</li> <li>- Paraquat it is not in Rotterdam convention, but included in the PAN list.</li> <li>- Rotterdam and Stockholm are not updated.</li> <li>- Production: GAP and this includes the use of different agrochemicals.</li> <li>- How is this handled and used? RTRS covers this, RTRS requests everywhere the use of GAP.</li> <li>- The only way to reduce the prices of a product is to create demand for it.</li> <li>- When products with high toxicity are banned a new market for new less dangerous products is created and this increases the demand and the prices go down.</li> <li>- INTA, AAPRESID, CREA, EMBRAPA are source of information.</li> <li>- What kind of evidence should be presented? Producers can present how they are using the alternatives, if these alternatives are effective, a comparison of the price of alternative products, etc.</li> <li>- Concerns can be sent to the Secretariat who will inform to the board.</li> <li>- Everybody can send information in order to prove that there is no replacement.</li> <li>- There is a concern that members are not aware of this deadline, or that this note has been misinterpreted.</li> </ul> |
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|    |   |  |  | <p><u>Conclusion 1:</u> add a clarification in the note: 5.6.2 Use of Paraquat and Carbofuran is eliminated by June 2017. <u>Note for 5.6.2:</u> In the Case of Paraquat, the deadline for the prohibition for its use by June 2017 could be extended by the RTRS if enough evidence is put forward <b>and is sent to the RTRS Secretariat</b> before June 2016 to demonstrate that at the time there are still no alternatives in the market (globally or locally), that can substitute it with less environmental and human risks and with similar costs.</p> <p><u>Conclusion 2:</u> It is proposed that the secretariat sends an email to all members to clarify the note and to remind all members about the deadline.</p> <p><u>Conclusion 3:</u> the title of the Criterion is changed to “5.6 Responsible use of agrochemicals”</p> |
| 77 | 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. | This is unclear, what is a “peri-urban area” defined as? This creates some confusion with the language used. | Clarify the definition of “peri-urban area” in a Canadian context. | Conclusion: Out of the scope, this should be clarified in the Canadian NI   |

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| 78             | <p>5.10.1 When a change in soybean production is introduced, which could impact on neighbouring systems, it is the responsibility of the producer making the change to implement a buffer strip of 30 meters. (e.g. in areas where production is generally GMO, it is the responsibility of an organic or non-GM farmers to maintain a buffer around his own production)</p> | <p>For over 15 years Canada has been a nation that grows both genetically modified and non-genetically modified crops to satisfy the diverse needs of our customers.</p> <p>Canada is recognized around the world for its segregation system and it is what sets us apart from our competitors. For the past 15 years Canada has adopted a system that allows for each type of crop to co-exist. By introducing a new standard to this system could jeopardize the industry and put Canada at a disadvantage.</p> <p>Furthermore, in regions of Canada, field sizes can range significantly. For instance, in Ontario, a field could be as small as 15 acres (6.07 hectares). In a field that is only 15 acres (6.07 hectares) maintaining a 30 meter buffer would take up a significant portion of the field.</p> | <p>In Canada, specified buffers of 3 meters in soybeans have been set between GMO and non-GMO crops (to maintain genetic purity). To address indicator 5.10.1, Grain Farmers of Ontario would recommend removal of the 30 meter buffer restriction between areas that have change in production. The solution would be to have farmers maintain a 3 meter buffer. A 3 meter buffer is already common practice in Canada between GMO and non-GMO to remain genetic purity</p> | <p>Discussion</p> <ul style="list-style-type: none"> <li>- The 30 meters was the outcome of an informed decision in the “Development Group” that developed the original standard.</li> <li>- In countries where it is demonstrated that less than 30 meters in order to maintain the purity of the crop works, the buffer could be smaller.</li> <li>- For small producers is complicated to leave a buffer of 30 meters.</li> </ul> <p>Conclusion: add in the guidance for indicator 5.10.1</p> <p>In countries or regions where it is proven than 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 at national level practices.</p> |
| Other comments |  |  |  |  |
| 79             | General comments   |  | General recommendations:   | For RTRS   |

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|    |                  |  | <p>1. Contact with producers<br/>We consider it of vital importance that producers see the added value of obtaining certification and feel empowered (in terms of financial means, capacity and time) to change their farming practices for the better. Therefore we encourage RTRS to maintain and improve the dialogue with producer organizations in especially South-America and to take into account their feedback on the production standard</p>  |                        |
| 80 | General comments |  | <p>Focus on applicability<br/>The RTRS production standard includes substantial requirements for analysis, monitoring and plan making. Although the producer will certainly benefit from this (management) information, in the short term it is often perceived as time consuming and costly for producers to collect, store and analyze the different parameters.<br/>In the new version we clearly see attempts to make the standard more practical and to give more detailed (practical) guidance. However at the same time new risk assessments and concepts (inclusive business models) are</p> | Presented to the group |

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|    |   |  | introduced which, without further clarification, will make the standard more complicated. We recommend RTRS to properly assess the practical applicability of the standard in close dialogue with farmer's organizations and ask RTRS to explain |  |
| 81 | 5b. Application of phytosanitary products only when the economical damage threshold is exceeded | The principle of "economical damage threshold" needs an alternative as in case of fungi an early application before reaching such damage is vital. | Add "or when a qualified agronomist would apply" after "economical damage threshold is exceeded".  | Conclusion to add the following:<br>Application of phytosanitary products only when the economical damage threshold is exceeded. Exceptions are allowed in the use of phytosanitary products in a preventive way when qualified agronomists recommend this practice due to exceptional conditions. |

## Sub - Annex 2: Comments regarding 4.4

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| 1 | General Comment about 4.4   | <p>We welcome the reference to legal requirements in the sketched options in the new document and we also appreciate RTRS's efforts to come up with a standard for maize.</p> <p>Concerning deforestation we have in general the following remarks:<br/>         Make clear where the RTRS mapping goes beyond legal and what kind of compensation mechanisms should be implemented.<br/>         Since it is about land usage the item of preventing deforestation can never be allocated to one crop only.<br/>         The instrument of so called land swop should be considered to be allowed: to compensate wrong doing in the past.</p> <p>It is often mentioned that the use of a cut-off date prevents good farmers who happened to have deforested after that cut-off date to participate in sustainability programmes, despite their good intentions. We welcome the thinking about this problem in the 4 options, but warns for a complete standstill of development after 2016.</p> |  | <p><b><u>Discussions around 4.4 for all comments received:</u></b><br/>         Arguments Summary:</p> <p>Why a cut-off date?<br/>         - To limit expansion<br/>         - In the beginning it was a guidance.<br/>         - Soy moratorium was part of the same movement.<br/>         - It responded to a need: crop expansion, but not all regions had the same expansion process and problems.</p> <p>- Producers need clarity in the wording.</p> <p>- HCV is a complicated concept, hard to explain and hard to implement. It is also associated to high costs.<br/>         - It is important to consider the amount of comments from the demand side, what consumers want, they want a clear message against deforestation.</p> |
| 2 | This criterion largely restricts the possibility of certifying areas that | Our proposal determines that, irrespective of the cutoff date, changes in the use of land could be   |  | <p>- Producers that are not in compliance because of this cut-</p>   |

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| <p>are traditional agricultural areas (such as the pampeana region in Argentina). Areas in the borders where agriculture is advancing (e.g. Chaco, in Argentina) and where many of the social and environmental issues are taking place currently these are slightly marginalized from certification scheme.</p> <p>Under the premise of not certifying locations with environmental and social issues, we discourage businesses from committing themselves to carry out different activities in such locations.</p> <p>On the other hand, not all the ecoregions have entered into the process of expanding agri-livestock borders at the same historical time, nor have they the same status of public awareness</p> | <p>introduced in areas within the legal framework where there are categories or percentages that enable the use of new lands.</p> <p>The legal aspect is independent from the time aspect, hence, the legal framework of each country should be assessed.</p> <p>This leads us to the need for determining what the legal framework is like in each country, where, in the legally enabled locations in each country, Certification could be accepted by the RTRS, but in combination with compensation policies. The same could apply in traditionally transformed areas that could make up for this by adding surfaces to be preserved in other areas within the same ecosystem or ecoregion.</p> <p>An option we are analyzing is adopting a principle on "Common, yet Differentiated, Responsibilities" (as with carbon emissions) and an agreement by which the funding for coping with the advance of the agricultural border and deforestation be applied also in regions or provinces with higher levels of soy production, that is, areas where the transformation of natural systems may have taken place long before.</p> <p>Such compensation mechanisms should be as follows:</p> <p>One-on-One Compensation: each enabled hectare should be compensated for with a hectare devoted to long-term conservation (HCVAs and Corridors, if any, are considered as</p> |  | <p>off date are marginalized; there are no incentives for them to have responsible practices because they will never comply with the cut-off date.</p> <ul style="list-style-type: none"> <li>- There should be a compensation mechanism in place for producers that want to comply, that do everything good, but are limited because this cut-off date.</li> <li>- The cut-off date does not solve the deforestation problem in areas where deforestation is happening; the farms that certify are farms that are located in areas without deforestation problems. Is the RTRS standard used in areas where deforestation is an issue?</li> <li>- RTRS has to be kept as a credible standard, changing the cut-off date will affect RTRS' credibility.</li> <li>- RTRS is a voluntary scheme, those producers that do not comply or do not want to comply can open or convert land, this is voluntary.</li> </ul> |
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|  |  | <p>priorities). This could firstly be done based on a land scale; secondly, on a landscape scale, and, thirdly, on an ecoregion scale.</p> <p>Activities involving HCVAs may be used as compensation measures for areas transformed according to zoning procedures and, XXXX, with changes in uses previous to the RTRS cut-off date.</p> <p>The different ecoregions in South America have different historical dynamics as regards land permits, hence, should there be a cut-off date in place, such date should be specific for each different ecoregion.</p> <p>As to map and policy development, RTRS should draw upon the law of the relevant countries. In the case of Argentina, for instance, this could be the OTBN (Ordenamiento Territorial de los Bosques Nativos or Native Forest Zoning Ordinance), with 2007 - year the ordinance was passed - as its key year.</p> <p>RTRS should consider a mechanism that assures the update of such Maps.</p> <p>As the RTRS Criteria are under review and as it is necessary for maps to accurately adjust to such Criteria, it is important that the review and development of RTRS Maps be done once the Criteria review is completed.</p> <p>Within a system identified as valuable (e.g. Native Forests), there are higher conservation</p> |  | <ul style="list-style-type: none"> <li>- RTRS does not solve deforestation issue by itself but acts as a reference in business and public policies.</li> <li>- The decision of making a business/ investment is not and will not be based in certification.</li> <li>- There are lots of misunderstandings; the maps have a lot of "ifs" and "ors".</li> <li>- The cut-off date should be a commitment between market needs and producers' possibilities.</li> </ul> <p><b><u>Proposal from Group members for the new 4.4</u></b></p> <p>For certification under this standard, priority natural lands for conservation have not been cleared or converted into productive areas after may 2009, this includes:</p> <p>›1.a) Where RTRS maps are available:</p> |
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|  |  | <p>value areas (HCVAs, CE). That is, it is necessary to identify these areas, areas that must be specifically protected within valuable areas with larger surfaces.</p> <p>Identifying HCVAs in each value ecoregion (grasslands, forests, wetlands).</p> <p>For areas legally cleared, meeting a neutral Carbon balance, areas legally enabled must be compensated for with a similar surface to be devoted to long-term conservation (Net Deforestation = 0). Such compensation should be granted on a triple level: on a farm level, on a landscape level and on an ecoregion level.</p> <p>Farm Implementation Mechanism: land owners themselves may compensate for their production surface with forest/grassland areas present on their properties or on other properties owned by them, on condition that they are located in the same ecoregion.</p> <p>In the case of Argentina, compensation should be granted to transformed areas as per legal permits after 2007.</p> <p>Areas compensated for would then become Red Conservation Status areas.</p> <p>Any land use change and compensation mechanism must be implemented through a Zoning Plan (POP - Plan de Ordenamiento Predial) within a "Sustainable Landscape". Such Plan shall be used by auditors for checking</p> |  | <p>› all natural lands included in category one<br/> ›1.b) Where RTRS maps are not available the following priority areas:<br/> a) native forests*,<br/> b) riparian vegetation**,<br/> c) wetlands,<br/> d) steep slopes, e) peat lands,<br/> f) areas designated by law to serve the purpose of native protection,<br/> g) high carbon stock areas<br/> 2) For all other kind of natural lands not mentioned on item 1,<br/> no conversion is allowed after 2016</p> <p>No changes in the indicator 4.4.2</p> <p><b>Conclusion:</b> some organizations need to check with their own organizations to support this 4.4. Feedback will be sent by email.</p> <p>Note: some concerns were</p> |
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|   |   | productive areas and conservation areas.<br><br>We propose creating a Technical Group or a Research Group to follow-up the proposal, that shall allow for the monitoring and adjustment (as done with agrochemicals) in the coming years for defining something workable, based on reality.  |  | raised regarding some definitions and interpretations after the meeting.<br>The final 4.4 for consultation which is not considered final is the following:<br><br>4.4.1 For certification under this standard, priority natural lands for conservation have not been cleared or converted into productive areas after May 2009. Priority natural lands include:<br>4.4.1.a Where RTRS maps are available:<br>all areas included in category I of the maps<br>4.4.1.b Where RTRS maps are not available the following areas:<br><ul style="list-style-type: none"> <li>a) native forests (see glossary),</li> <li>b) riparian vegetation,</li> <li>c) natural wetlands,</li> <li>d) steep slopes,</li> <li>e) areas with high below ground carbon stocks</li> <li>f) areas designated by law to serve the purpose of native conservation and/or cultural and social protection.</li> </ul> |
| 3 | Following new text (option 1 in the RTRS standard version 3.0):<br>4.4. Expansion of soy cultivation is responsible For certification under this Standard, priority natural lands for conservation have not been cleared or converted into productive areas after May 2009, in particular the following:<br>a) Native Forests* b) Riparian Vegetation c) Wetlands d) Swamps e) Floodplains f) Steep slopes g) Peat lands h) Areas designated by law to serve the purpose of nature protection i) High carbon areas j) Other priority areas defined by the RTRS maps1. When there are no RTRS maps available the other priority areas must be defined according to the convention of biodiversity maps, or other biodiversity maps and information available defined by the National Interpretation.<br>1) Annex 4 RTRS maps and systems remains as it is. | Option 1<br><br>1) Annex 4 RTRS maps and systems remains as it is.<br><br>Native Forest: should be defined in the Glossary as in standard version 2.0:<br>Areas of native vegetation of 1ha or more with canopy cover of more than 35 % and where some trees (at least 10 trees per hectare) reach 10m in height (or are able to reach these thresholds in situ (ie. In that soil/climate combination)). |  |   |

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| 4 | <p>We support option 1 in general but not all of it.</p> <p>The cut-off date 2009 must be retained.</p> <p>Option 1 j) Other priority areas defined by the RTRS maps .... should be reworded.</p> <ul style="list-style-type: none"> <li>• The reference to the HCV approached must be retained. This is used in many different for a and other standards. For buyers of many commodities consistency with other standards is important. The HCV and cut off date is included in the Swedish criteria for public procurement of soy as animal feed.</li> <li>• The “other priority areas” should be explained.</li> </ul> <p>Original 4.4.2 is missing from option 1 and must be retained.</p> | <p>Keep option 1 but with improved wording/structure.</p> <p>The cut-off date 2009 must be retained.</p> <p>Option 1 j) must be amended related to the requirement of when there are no maps available.</p> <ul style="list-style-type: none"> <li>• The reference to the HCV approached must be retained instead of the current draft unclear reference to convention of biodiversity maps, or other biodiversity maps</li> <li>• The “other priority areas” as defined by the RTRS maps should be explained.</li> </ul> <p>Retain original 4.4.2</p> |  | <p>4.4.2 For all natural land types not included in the areas listed in 4.4.1.a or 4.4.1.b, no conversion is allowed after 2 016.</p> <p>4.4.3 There is no conversion of land where there is an unresolved land use claim by traditional land users under litigation, without the agreement of both parties.</p> |
| 5 | <p>We support option 1 in general but not all of it.</p> <p>The cut-off date 2009 must be retained.</p>  | <p>Keep option 1 but with improved wording/structure.</p> <p>The cut-off date 2009 must be retained.</p>   |  |  |

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|   | <p>Option 1 j) Other priority areas defined by the RTRS maps .... should be reworded.</p> <ul style="list-style-type: none"> <li>The reference to the HCV approached must be retained. This is used in many different for a and other standards. For buyers of many commodities consistency with other standards is important. The HCV and cut off date is included in the Swedish criteria for public procurement of soy as animal feed.</li> <li>The “other priority areas” should be explained.</li> </ul> <p>Original 4.4.2 is missing from option 1 and must be retained.</p> | <p>Option 1 j) must be amended related to the requirement of when there are no maps available.</p> <ul style="list-style-type: none"> <li>The reference to the HCV approached must be retained instead of the current draft unclear reference to convention of biodiversity maps, or other biodiversity maps</li> <li>The “other priority areas” as defined by the RTRS maps should be explained.</li> </ul> <p>Retain original 4.4.2</p> |  |  |
| 6 | <p>HKScan support option 1 in general but we would like to see an addition under j).</p> <p>Keep 2009 “priority natural lands for conservation have not been cleared or converted into productive areas after May 2009”.</p> <p>Option 1 j) to add:</p>  | <p>Keep option 1 but with improved wording/structure.</p> <p>The cut-off date 2009 must be retained.</p> <p>Option 1 j) must be amended related to the requirement of when there are no maps available.</p> <ul style="list-style-type: none"> <li>The reference to the HCV approached must be retained instead of the current</li> </ul>   |  |  |

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|   | <ul style="list-style-type: none"> <li>The reference to the HVC approached must be kept. HVC is referred to by many companies, public procurement and standards. For buyers of many commodities consistency with other standards is important. The HCV and cut-off date is included in the Swedish criteria for public procurement of soy as animal feed.</li> <li>The “other priority areas” should be explained.</li> </ul> <p>Original 4.4.2 is missing from option 1 and must be retained.</p> | <p>draft unclear reference to convention of biodiversity maps, or other biodiversity maps</p> <ul style="list-style-type: none"> <li>The “other priority areas” as defined by the RTRS maps should be explained.</li> </ul> <p>Retain original 4.4.2</p>   |  |  |
| 7 | <p>We support option 1 in general but not all of it.</p> <p>The cut-off date 2009 must be retained.</p> <p>Option 1 j) Other priority areas defined by the RTRS maps .... should be reworded.</p> <ul style="list-style-type: none"> <li>The reference to the HCV approached must be retained. This is used in many different forums and other standards. For buyers</li> </ul>  | <p>Keep option 1 but with improved wording/structure.</p> <p>The cut-off date 2009 must be retained.</p> <p>Option 1 j) must be amended related to the requirement of when there are no maps available.</p> <ul style="list-style-type: none"> <li>The reference to the HCV approached must be retained instead of the current draft unclear reference to convention of biodiversity maps, or other biodiversity maps</li> <li>The “other priority areas” as defined by</li> </ul> |  |  |

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|   | <p>of many commodities consistency with other standards is important. The HCV and cut off date is included in the Swedish criteria for public procurement of soy as animal feed.</p> <ul style="list-style-type: none"> <li>• The “other priority areas” should be explained.</li> </ul> <p>Original 4.4.2 is missing from option 1 and must be retained.</p>  | <p>the RTRS maps should be explained.</p> <p>Retain original 4.4.2</p>   |  |  |
| 8 | <p>We support option 1 in general but not all of it. The cut-off date 2009 must be retained.</p> <p>Option 1 j) Other priority areas defined by the RTRS maps .... should be reworded.</p> <ul style="list-style-type: none"> <li>• The reference to the HCV approached must be retained. This is used in many different for a and other standards. For buyers of many commodities consistency with other standards is important.</li> <li>• The HCV and cut off date is included in the Swedish criteria for public procurement of soy as animal feed. Those</li> </ul> | <p>Keep option 1 but with improved wording/structure.</p> <p>The cut-off date 2009 must be retained.</p> <p>Option 1 j) must be amended related to the requirement of when there are no maps available.</p> <ul style="list-style-type: none"> <li>• The reference to the HCV approached must be retained instead of the current draft unclear reference to convention of biodiversity maps, or other biodiversity maps</li> <li>• The “other priority areas” as defined by the RTRS maps should be explained.</li> </ul> <p>Retain original 4.4.2</p> |  |  |

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|    | <p>criteria is used in both public and private sector, and is a well- established important part of the procurement system in Sweden.</p> <p>· The “other priority areas” should be explained. Original 4.4.2 is missing from option 1 and must be retained.</p>   |   |  |  |
| 9  | <p>Option1</p> <p>4.4.1 For certification under this Standard, priority natural lands for conservation have not been cleared or converted into productive areas after May 2009, in particular the following:</p>   | <p>There is a lack of accurate information about biodiversity / affected locations.</p> <p>Add: Studies of High Conservation Values in the sights, biological inventories. (HCV approach)</p>   |  |  |
| 10 | <p>Clearer wording is proposed, as the first RTRS maps are available now for Brazil and Paraguay, to avoid misinterpretation.</p> <p>As option 1 is proposed by the Executive Board it is assumed that it mirrors the procedures in practice of current 4.4. Therefore the cut-off date 2009 should be retained.</p> <p>We do not advise the alternative options, this not the moment to</p> | <p>4.4.1. Farms where expansion has occurred after May 2009 on priority conservation habitats and/or structures as per below are not eligible for certification.</p> <p>a) native forests*</p> <p>b) riparian zones</p> <p>c) steep slopes or erosion prone soils</p> <p>d) natural wetlands**</p> <p>e) high below-ground carbon stocks***</p> <p>f) areas designated by law to serve the purpose of nature protection</p> <p>g) other priority areas, such as grasslands, woodlands, etc, as defined by the RTRS maps (Annex 4). Where there are no endorsed RTRS</p> |  |  |

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|    | <p>move the cut-off date, nor to introduce the concept of restoration and compensation in a poorly defined manner.</p> <p>We recognize this will be difficult for some frontier zones for development and encourage RTRS to develop alternative options to full RTRS certification to enable development where appropriate in these areas. (e.g. perhaps look at RTRS's forthcoming Community certification pilot trial, or verification of excellent farmers development and support programmes like the SojaPlus)</p> <p>While we in principle support the content of option 1 we find that the wording needs to be improved. Therefore we have provided a suggestion for improved wording, in line with that proposed by WWF. In this proposal it is crucial to retain the HCV concept for areas not covered by maps.</p> <p>Original 4.4.2 is missing from option 1 and must be retained.</p> | <p>maps as per Annex 4, additional priority areas shall be identified through High Conservation Value Assessments, adapted to the scale and risk in line with HCV Resource Network Guidance and based on National HVC Interpretations (where available).</p> <p>4.4.2 There is no conversion of land where there is an unresolved land use claim by traditional land users under litigation, without the agreement of both parties.</p> <p>Note: Annex 4 RTRS maps and systems must remain as in RTRS_STD_002_V2-0<br/> * Native forests: see Comment 3 below<br/> ** Definition: Natural wetlands include all permanent or seasonal natural wetlands, such as swamps and floodplains.</p> <p>*** according to definition in the draft</p> |  |  |
| 11 | <p>Option 1<br/> Proposal of clearer wording, as the first RTRS maps are available now</p>  | <p>4.4.1. Farms where expansion has occurred after May 2009 on priority conservation habitats and/or structures as per below are not eligible</p>  |  |  |

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|  | <p>for Brazil and Paraguay, to avoid miss-interpretation and miss understanding.</p> <p>Note: As option 1 is proposed by the Board of Directors it is assumed that it mirrors the procedures in practice of current 4.4. Therefore the cut-off date 2009 can be retained.</p> <p>While we in principle support the content of option 1 we find that the wording needs to be improved. Therefore we have provided a suggestion for improved wording. In this proposal it is crucial to retain the HCV concept for areas not covered by maps.</p> <p>Original 4.4.2 is missing from option 1 and must be retained.</p> | <p>for certification.</p> <ul style="list-style-type: none"> <li>a) native forests*</li> <li>b) riparian zones</li> <li>c) steep slopes or erosion prone soils</li> <li>d) natural wetlands**</li> <li>e) high below-ground carbon stocks***</li> <li>f) areas designated by law to serve the purpose of nature protection</li> <li>g) other priority areas, such as grasslands, woodlands, etc, as defined by the RTRS maps ( Annex 4). Where there are no endorsed RTRS maps as per Annex 4, additional priority areas shall be identified through High Conservation Value Assessments, adapted to the scale and risk in line with HCV Resource Network Guidance and based on National HVC Interpretations (where available).</li> </ul> <p>4.4.2 There is no conversion of land where there is an unresolved land use claim by traditional land users under litigation, without the agreement of both parties.</p> <p>Note: Annex 4 RTRS maps and systems must remain as in RTRS_STD_002_V2-0</p> <p>* Definition of native forests must remain as in RTRS_STD_002_V2-0</p> <p>** Definition: Natural wetlands include all permanent or seasonal natural wetlands, such as swamps and floodplains.</p> <p>*** according to definition in the draft</p> |  |  |
|  | <p>We consider responsible soy shouldn't affect natural habitats at</p>  | <p>Keep option 1</p>  |  |  |

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| 12 | <p>all. We also consider that any update of the standard must follow the non-regression principle. Introducing a new cut of date would mean a serious regression in the current criteria. To give a step back in this issue would be a very bad message to markets, consumers and to civil society. RTRS should promote an efficient use of already converted or degraded lands, instead of recognizing the expansion over natural lands as responsible.</p> |  |  |  |
| 13 | <p>Changing the deforestation cut-off date will undermine the credibility and reputation of the RTRS standard. It will also create a bigger gap (in the Amazon) between the Soy Moratorium and the RTRS Standard (where now the cut-off date is closely aligned: 2008 vs 2009)</p> <p>If this criteria was to be weakened we as a business would urgently reassess whether or not to continue to use the RTRS standard in our supply chain</p>               | Keep option 1  |  |  |
| 14 | <p>Support option 1<br/>4.4.2 It is missing: There is no conversion of land where there is</p>   | <p>We consider responsible soy shouldn't affect natural habitats at all. We also consider that any update of the standard must follow the non-</p> |  |  |

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|           | <p>an unresolved land use claim by traditional land users under litigation, without the agreement of both parties.</p>  | <p>regression principle. Introducing a new cut of date would mean a serious regression in the current criteria. To give a step back in this issue would be a very bad message to markets, consumers and to civil society. RTRS should promote an efficient use of already converted or degraded lands, instead of recognizing the expansion over natural lands as responsible.</p> <p>Keep 4.4.2</p>  |  |  |
| <p>15</p> | <p>We support Option 1: Zero deforestation and maintenance of the current cut-off date (May 2009)</p> <p>Most acceptable option even though this may need some further and more detailed explanation.</p> | <p>Option 2: Changing the cut-off date to 1st of June 2016.</p> <p>Not acceptable. There is no justification to change the earlier defined cut-off date.</p> <p>Option 3: Maintenance of the cut-off date 2009, but allowing expansion between May 2009 and June 2016 only if all these requirements are complied with:</p> <ul style="list-style-type: none"> <li>- Expansion meets legal requirements</li> <li>- Expansion has been done according to RTRS expansion guidelines</li> <li>- If expansion occurs without a prior or adequate HCV assessment, an adequate compensation plan has been developed &amp; accepted by the RTRS.</li> </ul> <p>Not acceptable. You cannot change the cut-off date in retrospective. It would mean that producers responding to the first cut-off date did not have to do so. If compensation would be an option depends on defining what is meant by</p> |  |  |

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|    |               | <p>that first.</p> <p>Option 4: Maintenance of the cut-off date May 2009, but allowing expansion between May 2009 until June 2016 if it meets legal requirements.</p> <p>Not acceptable, same as above. This is changing the rules in retrospective.</p>  |   |  |
| 16 | Option 1      | <p>We consider responsible soy shouldn't affect natural habitats at all. We also consider that any update of the standard must follow the non-regression principle. Introducing a new cut of date would mean a serious regression in the current criteria. To give a step back in this issue would be a very bad message to markets, consumers and to civil society. RTRS should promote an efficient use of already converted or degraded lands, instead of recognizing the expansion over natural lands as responsible.</p> |   |  |
| 17 | 4.4.1 & 4.4.2 | <p>To Arla foods the protection of priority, natural lands is a core value of the RTRS standard as deforestation and related carbon emissions and biodiversity loss are serious sustainability challenges in soy cultivation. .</p> <p>We acknowledge "Option 1" as a more straight forward way to specify the criteria and to address the challenges of expansion. The criteria and its implications is easy to communicate, which is very important to us from a commercial perspective.</p>                                | <p>A clarification on the probabilities and consequences for the protection of priority, natural lands and for the possibilities for the growth of RTRS.</p> <p>What is the background for suggesting 01.06.2016 as new cut-off date?</p> |  |

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|    |  | <p>“Option 2-4” is complicated to understand and we find it difficult to comment on these options as we need clarifications on the pros and cons and preferably a background to the formulation of these options.</p>  |  |  |
| 18 | <p>Option 1<br/>4.4.1 For certification under this Standard, priority natural lands for conservation have not been cleared or converted into productive areas after May 2009, in particular the following:</p> <ul style="list-style-type: none"> <li>a) Native Forests</li> <li>b) Riparian Vegetation</li> <li>c) Wetlands</li> <li>d) Swamps</li> <li>e) Floodplains</li> <li>f) Steep slopes</li> <li>g) Peat lands</li> <li>h) Areas designated by law to serve the purpose of nature protection</li> <li>i) High carbon stocks areas</li> <li>j) Other priority areas defined by the RTRS maps<sup>3</sup>. When there are no RTRS maps available the other priority areas must be defined according to the convention of biodiversity maps, or other</li> </ul> | <p>General remark: It is not clear to us what is expected from the consultation partners in terms of the four options. Therefore we decided to briefly discuss all four.</p> <p>Option 1:<br/>We appreciate the attempt of RTRS to be very specific about the biomes / vegetation types that have to be protected. However this option doesn't solve the problem that farmers whom deforested after 2009 will never be able to join RTRS, unless their best intentions to produce responsible soy.</p> | <p>General remark:<br/>We suggest RTRS to communicate more about and explain in more detail the mapping approach and the additional value of the maps for responsible soy expansion. It is not clear how the maps have been created and who have been involved, nor what the role of government has been. Clarification of these items might contribute to a better appreciation and understanding of this approach.</p> |  |

<sup>3</sup> Anex 4 RTRS maps and system, remains as it is.

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|    | biodiversity maps and information available defined by the National Interpretation  |   |   |  |
| 19 | Option 2<br>4.4.1 Independent of vegetation type, only lands not cleared after 01.06.2016 will be eligible for RTRS certification   | The problem with a cut-off date (in the past) is that farmers that have deforested after this date will never be included in certification programs, even though they might work very hard to manage their company in a sustainable manner. This is one of the reasons why farmers are frustrated about certification. Option 2 offers a solution to this, as the cut-off date is somewhere in the future. It is a rather simple and straightforward approach, that can easily be monitored with today's remote sensing technologies. However, a negative effect might be that there is an incentive to quickly deforest before 01-06-2016 and that zero-deforestation after 2016 will basically block all economic activity. |   |  |
| 20 | Option 3<br>4.4.1 For certification under this Standard, priority natural lands for conservation have not been cleared or converted into productive areas after May 2009, in particular the following:<br>a) Native Forests<br>b) Riparian Vegetation<br>c) Wetlands<br>d) Swamps<br>e) Floodplains<br>f) Steep slopes<br>g) Peat lands | Positive about this option is that there is a clear reference to specific biomes / vegetation types, which is straight forward and in line with other initiatives. And in addition there is space for soy expansion later than 2009, only when certain principles are met. In the current phrasing it is not clear that no deforestation after 2016 (like in option 2) can take place. FEFAC is worried about this reference to 2016, as it basically blocks development of the agricultural sector not taking into account the vegetation type. It is also questionable how the RTRS maps that are currently being constructed play a role in the post 2016 scenario.  | FEFAC would suggest to take the first part of this option:<br>4.4.1 For certification under this Standard, priority natural lands for conservation have not been cleared or converted into productive areas after May 2009, in particular the following:<br>a) Native Forests |  |

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|  | <p>h) Areas designated by law to serve the purpose of nature protection<br/> i) High carbon stocks areas<br/> j) Other priority areas defined by the RTRS maps<sup>4</sup>. When there are no RTRS maps available the other priority areas must be defined according to the convention of biodiversity maps, or other biodiversity maps and information available defined by the National Interpretation.</p> <p>4.4.2 Where expansion occurred between May 2009 and May 2016 all the following conditions are met:<br/> It meets legal requirements<br/> It has been done according to RTRS expansion guides,<br/> If expansion occurred without a prior and adequate HCV assessment, an adequate compensation plan has been developed and accepted by the RTRS.</p> |  | <p>b) Riparian Vegetation<br/> c) Wetlands<br/> d) Swamps<br/> e) Floodplains<br/> f) Steep slopes<br/> g) Peat lands<br/> h) Areas designated by law to serve the purpose of nature protection<br/> i) High carbon stocks areas<br/> j) Other priority areas defined by the RTRS maps<sup>5</sup>. When there are no RTRS maps available the other priority areas must be defined according to the convention of biodiversity maps, or other biodiversity maps and information available defined by the National Interpretation.</p> <p>And to add:<br/> 4.4.2 Where expansion occurred after May</p> |  |
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<sup>4</sup> Anex 4 RTRS maps and system, remains as it is.

<sup>5</sup> Anex 4 RTRS maps and system, remains as it is.

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|    |  |  | <p>2009, the following conditions are met:</p> <ul style="list-style-type: none"> <li>It meets legal requirements</li> <li>It is in line with the RTRS mappings</li> <li>It has been done according to RTRS expansion guides</li> <li>If expansion occurred without a prior and adequate HCV assessment, an adequate compensation plan has been developed and accepted by the RTRS.</li> </ul> |  |
| 21 | <p>Option 4<br/>4.4.1 For certification under this Standard, priority natural lands for conservation have not been cleared or converted into productive areas after May 2009, in particular the following:</p> <ul style="list-style-type: none"> <li>a) Native Forests</li> <li>b) Riparian Vegetation</li> <li>c) Wetlands</li> <li>d) Swamps</li> <li>e) Floodplains</li> <li>f) Steep slopes</li> <li>g) Peat lands</li> <li>h) Areas designated by law to serve the purpose of nature protection</li> </ul> | <p>See the remarks for option 3. Although FEFAC strongly believes that legal compliance is the first step towards zero (net) deforestation, and has consciously chosen to only refer to legal compliance in its FEFAC Soy Sourcing Guidelines, it considers it very important that RTRS goes beyond legal compliance. The sectors (dairy, retail, brands) and initiatives (CSG, RSG, EBI) that are already referring to zero (net) deforestation need to be able to buy RTRS soy that indeed complies with zero (net) deforestation.</p> <p>Concerning the reference to zero deforestation after 2016, FEFAC considers it important that there remains space for development, in cooperation with the land management plans of</p> | <p>FEFAC would suggest to take the first part of this option:</p> <p>4.4.1 For certification under this Standard, priority natural lands for conservation have not been cleared or converted into productive areas after May 2009, in particular the following:</p> <ul style="list-style-type: none"> <li>a) Native Forests</li> <li>b) Riparian Vegetation</li> <li>c) Wetlands</li> </ul>   |  |

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|  | <p>i) High carbon stocks areas<br/>j) Other priority areas defined by the RTRS maps<sup>6</sup>. When there are no RTRS maps available the other priority areas must be defined according to the convention of biodiversity maps, or other biodiversity maps and information available defined by the National Interpretation.</p> <p>4.4.2 Where expansion occurred between May 2009 and May 2016 the following conditions are met:<br/>It meets legal requirements.</p> | <p>governments. The approach to make all development impossible after 2016 would give a perverse incentive to deforest before June 2016, and would make it even more difficult to involve farmer organizations.</p> | <p>d) Swamps<br/>e) Floodplains<br/>f) Steep slopes<br/>g) Peat lands<br/>h) Areas designated by law to serve the purpose of nature protection<br/>i) High carbon stocks areas<br/>j) Other priority areas defined by the RTRS maps<sup>7</sup>. When there are no RTRS maps available the other priority areas must be defined according to the convention of biodiversity maps, or other biodiversity maps and information available defined by the National Interpretation.</p> <p>And to add:<br/>4.4.2 Where expansion occurred after May 2009, the following conditions are met:</p> |  |
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<sup>6</sup> Anex 4 RTRS maps and system, remains as it is.

<sup>7</sup> Anex 4 RTRS maps and system, remains as it is.

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|    |   |   | <p>It meets legal requirements</p> <p>It is in line with the RTRS mappings</p> <p>It has been done according to RTRS expansion guides</p> <p>If expansion occurred without a prior and adequate HCV assessment, an adequate compensation plan has been developed and accepted by the RTRS.</p> |  |
| 22 | <p>Select Option 1:<br/>This revision of criterion 4.4.1 is a sensible re-wording of the existing language. The most important aspect of the revision is to maintain the central point of the existing strong and clear criterion, which correctly deals with the conservation of biological diversity and natural habitats, including avoidance of deforestation, in the cultivation of soy.</p> <p>The RTRS has been a credible and appropriate standard for soy. There is no reason to introduce a change that would reduce the reputation of the RTRS, by</p> | <p>Select Option 1.<br/>The only existing problem has been minor unclarity in the language of 4.4.1. Option 1 is the only choice that will deliver this improvement without seriously weakening the standard.</p> <p>Any of the other options would change the approach of the RTRS to deforestation, reducing its credibility and effectiveness, just when the sustainability approach for other commodities is moving toward a clearer rule of “zero deforestation”. This change would open up a big difference between the RTRS and the Soy Moratorium in the Brazilian Amazon, an unwarranted move which would go in the opposite direction from the New York Declaration signed last September at the United</p> |  |  |

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|    | opening it up to the serious critique that it encourages deforestation – which would be the impact of providing amnesty to deforestation between 2009 and 2016. In the case of other commodities, there is agreement that elimination of deforestation is a general goal. The RTRS should continue its 2009 cut- off date, maintain its credibility and avoid introducing ambiguity on this issue. | Nations Climate Summit. It also goes in the opposite direction from the pledge of the Consumer Goods Forum, many of whose members are important buyers of soy products, including those of RTRS members.                                     |   |  |
| 23 | OPTION 1: 4.4.1  | Support option 1   |   |  |
| 24 | Option 2<br>4.4.1 Independent of vegetation type, only lands not cleared after 01.06.16 will be eligible for RTRS certification.   | I think there has to be a reference to the national legislation each country has.  | Use this wording:<br><i>4.4.1 Independent of vegetation type</i> but legally in compliance with national legislation, <i>only lands not cleared after 01.06.2016 will be eligible for RTRS certification.</i> |  |
| 25 | Option 3<br>4.4.1 After May 2009, expansion for soy production has not occurred on lands where native habitats have been removed,  | Our region is considered Brazil's last agricultural frontier. According to indicator 4.4.1, only 260,797 hectares out of the covered 577,774 hectares are eligible for RTRS certification. All farmers follow the Brazilian legislation and, | Proposal: Independent of vegetation type but legally in compliance with national legislation, only lands  |  |

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|           | <p>except under the following conditions:</p>   | <p>as such, they do not adequately interpret the objectives of the RTRS.<br/>By using other RTRS principles in these regions, FAPCEN has promoted significant impacts on properties discarded by this indicator, allowing farmers to cast their gazes outwards from the doors of the properties, in full compliance with principles 2 and 3 of the Standard. These principles make a big difference in poorer regions with the lowest rates of human development, where agriculture has led to higher incomes, employment rates and per capita incomes.</p> | <p>not cleared after 01.06.2016 will be eligible for RTRS certification.</p> |  |
| <p>26</p> | <p>4.4 Option 3:<br/>4.4.1 For certification under this Standard, priority natural lands for conservation have not been cleared or converted into productive areas after May 2009, in particular the following:<br/>a) Native Forests<br/>b) Riparian Vegetation<br/>c) Wetlands<br/>d) Swamps<br/>e) Floodplains<br/>f) Steep slopes<br/>g) Peat lands<br/>h) Areas designated by law to serve the purpose of nature protection<br/>i) High carbon stocks areas<br/>j) Other priority areas defined by</p> | <p>Option 3 probably the most robust but would like to understand the rationale behind the other options. Also unsure what the difference is between RTRS maps 3 and 4.</p>   |  |  |

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|    | <p>the RTRS maps<sup>8</sup>. When there are no RTRS maps available the other priority areas must be defined according to the convention of biodiversity maps, or other biodiversity maps and information available defined by the National Interpretation.</p> <p>4.4.2 Where expansion occurred between May 2009 and May 2016 all the following conditions are met:</p> <p>It meets legal requirements<br/> It has been done according to RTRS expansion guides,<br/> If expansion occurred without a prior and adequate HCV assessment, an adequate compensation plan has been developed and accepted by the RTRS.</p> |   |  |  |
| 27 | <p>We propose to review the criteria, with:</p> <p>“4.4.2 Where expansion occurred between May 2009 and May 2016 all the following conditions are met:</p> <p>It meets legal requirements<br/> It has been done according to RTRS expansion guides,<br/> If expansion occurred without a</p>  | <p>The today’s following criteria have a break based in May 2009. But, the today’s legal requirements are heavier, and maybe the criteria would be changed.</p> |  |  |

<sup>8</sup> Anex 4 RTRS maps and system, remains as it is.

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|    | prior and adequate HCV assessment, an adequate compensation plan has been developed and accepted by the RTRS.”   |  |  |  |
| 28 | Which of the 4 options proposals for the redefinition of the 4.4 Criterion is best for RTRS standard<br>My voice goes to N° 3 option (on the 4 options proposed into the “draft V3 RTRS Standard for public consultation”), enabling RTRS to keep high level of requirement and at the same time keeping a pragmatical approach to get the more people we can on board | Either there is higher focus on assessing how soy expansion is done, regardless of the date, or the limiting date is changed under a dynamic and flexible criteria specially adapted to Argentinian circumstances. |  |  |
| 29 | 4.4.1 Soy Expansion  | Having a limiting date for soy cultivation (cut-off date) doesn´t make much sense per se.  |  |  |
| 30 | 4.4.1 Soy Expansion Justifications :<br><br>- We must demonstrate an advance on our original P&C which will align us with public opinion and negate the earlier criticism of radical NGOs that we were not totally forbidding clearing, as it was permitted within legal limits outside of HCVA areas. In Brazil, the focus has now shifted to the                     | Text proposed: 4.4.1 After June 30th 2016 expansion for soy cultivation has not taken place on land cleared of native habitat  |  |  |

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| <p>Cerrado region, where clearing is still significant and it is rumoured that the official figure of 50% still standing is an over-estimate.</p> <p>- Times have changed and even in Brazil there is a general acceptance among progressive farmers that horizontal expansion is unnecessary because we can intensify land use on over 40 million hectares of under-used pastures in order to meet future demand over the next 25 years – this should be incentivated by “intensification grants” paid for by REDD, or other international or national mechanism to show that society is willing to pay farmers for biodiversity preservation and GHG mitigation – a debate on this topic needs to be included in RT11 focussing on such mechanisms as intensification grants, green indexing in stock markets, green guidelines in financing organizations and a revised Kyoto (what went wrong with REDD?)..</p> <p>- RTRS is not denying anyone their legal right to clear land, certification is a voluntary process merely excluding such land from being certified, by (popular)</p> |  |  |  |
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| <p>consumer demand.</p> <p>- The RTRS = Zero De-forestation banner is an excellent one to give a needed boost to sales in Europe. We will need a BIG communication campaign in second semester 2016.</p> <p>- This modification is a HUGE simplification for the certification process and eliminates the need for RTRS to undertake expensive mapping of HCVA areas in other countries, competing with governments who themselves should be doing this. This benefit offsets the impact of earlier criticism by farmers of the complicated nature of the RTRS HCVA procedure. To the Cassandras, we can say that the HCVA exercises have awakened all sectors, especially governments, to the value of maintaining HCVA and have materially contributed to the implantation of national HCVA concepts and procedures.</p> <p>- On the basis of the outcome of RT11, the zero de-forestation proposal should be communicated officially to governments and civil society think tanks, but not before</p> |  |  |  |
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| <p>approval by the AGM.</p> <p>- As a foundation for the argument for environmental payments for land use intensification an improved calculation of the magnitude of benefits needs to be undertaken, with a realistic valuation of the cost of continued land clearing. To date I have not seen a black and white value put on the preservation of biodiversity for future generations (it's all non-numerical hype) and we are dependent on the inevitably protracted renewal of the Kyoto accord to see whether carbon credits for reduction of GHG emissions will be renewed and if farmers will actually have easy access to them. There is also urgent need for a comparison of the reduction in GHG emissions and pollution by improved farming practices, as compared to these same indicators for the urban population, plus a calculation of the wealth transfer to society generated by the reduction in food costs by about 30% over the last 25 years and other economies generated by better farming practices e.g. positive downstream effects of erosion control with</p> |  |  |  |
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|    | conservation agriculture. To this end, RTRS should request this of international and other independent agencies.   |  |   |  |
| 31 | Proposal for 4.4: When land has been cleared before May 2009, no HCV assessment is required. When land has been cleared after May 2009, the deforestation cannot take place in special protection areas (e.g. Parks), remnants of the Amazon rainforest, special protection areas (APA) and in the priority areas of MMA without an HCV assessment. In cases where a socioeconomic ecological zoning plan from the government is available, the evaluation will be done according to the zoning plan criteria. |  |   |  |
| 32 | 4.4.1.2 Where no RTRS-approved Guidance system is available  | <p>The Note above this criteria should be updated to reflect that we are a few years past this date:<br/> Note: This criterion will be revised after June 2012 if RTRS-approved Guidance - system is not available.</p> <p>Since 2012 the global definitions of HCV have been updated, along with some updated interpretation which means that the focus is no longer on HCV “Areas” but rather on the values themselves. Therefore, where the standard refers to High Conservation Value Areas (HCVA), this</p> | <p>Note: This criterion will be revised after June 2012 if RTRS-approved Guidance - system is not available.</p> <p>Option 2. A High Conservation Value (HCV) assessment is undertaken prior to clearing and there is no damage to High</p> |  |

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|    |  | should be changed to High Conservation Values.  | Conservation Values or conversion of areas required to maintain High Conservation Values.   |  |
| 33 | Annex 4: RTRS Approach to Responsible Conversion | <p>It is not clear what the short term and medium term are, would be good to provide some more detail on timing. It says that some work on developing the RTRS guidance system will be completed before end of 2012. Has this been done? The text should be updated to reflect this.</p> <p>Category I Areas = areas which are critical for biodiversity (hotspots), where stakeholders agree there should not be any conversion of native vegetation to responsible soy production.</p> <p>Guidance will also be produced on how to undertake the HCV assessments required for expansion in Category II areas.</p> | <p>Category II Areas = areas with high importance for biodiversity where expansion of soy is only carried out after an HCV assessment which identifies areas for conservation and areas where expansion can occur.</p> <p>For all: replace HCVA for HCV</p> <p>Recommend that you reference the HCV Resource Network Common Guidance available at:<br/> <a href="https://www.hcvnetwork.org/resources/resources/folder.2006-09-29.6584228415">https://www.hcvnetwork.org/resources/resources/folder.2006-09-29.6584228415</a></p> <p>3. Production of national macro-scale maps</p> |  |

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|    |  |  | <p>3.5 The multi-stakeholder group reviews the generic methodology for on-farm HCV assessments for expansion in Category II areas and produces a national version.</p> <p>Using the term "hotspots" may be confusing because it will make people think of Conservation International's Hotspots<br/> <a href="http://www.conservat ion.org/How/Pages/Hotspots.aspx">http://www.conservat ion.org/How/Pages/Hotspots.aspx</a></p> <p>Regarding the Guidance what is the timeline for this?<br/> What is happening so far?</p> |  |
| 34 | Annex 4 – Native forests*<br>Definition of native forests in RTRS_STD_002_V2-0 | * Definition of native forests currently reads:<br>Areas of native vegetation of 1ha or more with canopy cover of more than 35 % and where some trees(at least 10 trees per hectare) reach 10m in height (or are able to reach these | There may be several options for a better definition of native forests,<br>e.g. 1 – use the  |  |

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|    |                   | <p>thresholds in situ (ie. In that soil/climate combination))</p> <p>This is not a proper definition of native forests; it is not assessable at landscape level; it makes no reference to viability of ecosystems. For these reasons, the maps that have been developed so far do not comply with this definition.</p> | <p>definition that was applied for the Brazil / Paraguay maps in different biomes e.g. 2 – use / adapt the HCS Approach <a href="http://highcarbonstock.org/">http://highcarbonstock.org/</a> definition, which is a landscape level approach that has been developed for tropical areas</p>   |  |
| 35 | Annex 1: Guidance | <p>4.4.1.2 c) Option 2:</p> <p>An High Conservation Value Area (HCVA) assessment is undertaken prior to clearing and there is no conversion of High Conservation Value Areas.</p>  | <p>Changes proposed for the text:</p> <p>4.4.1.2 c) option 2: HCV assessment should be undertaken using HCV Resource Network guidance e.g. HCV Common Guidance and referencing National HCV Interpretations (where these exist). Note that where National HCV Interpretations pre-date or differ from official HCV Resource Network definitions and interpretations, the global guidance takes precedence. The</p> |  |

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|    |                            |  | <p>assessors should be recognized by RTRS or the HCV Resource Network.</p> <p>or</p> <p>HCV Resource Network is working on a new system for carrying out HCV assessments in lower risk contexts – that might not need assessors to go through the Assessor Licensing Scheme.</p>   |  |
| 36 | Annex 3: Glossary of Terms | <p>An HCV is a biological, ecological, social or cultural value of outstanding significance or critical importance. There are six categories of HCVs (FSC v. 5.0 2012 and HCV Resource Network Common Guidance 2013):</p> <p>Please note updated HCV definitions</p> | <p>HCV 1<br/>Concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels.</p> <p>HCV 2 - Large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable</p> |  |

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|  |  |  | <p>populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.</p> <p>HCV 3 - Rare, threatened, or endangered ecosystems, habitats or refugia.</p> <p>HCV 4 - Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.</p> <p>HCV 5 - 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.</p> <p>HCV 6 - Sites,</p> |  |
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|    |   |   | 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. |  |
| 37 | <p>There are 4 sets of options for areas where conversion should not happen – if soy cultivation is to be considered responsible. There are many items in the lists ranging from native forests, wetland and peat lands to high carbon stock areas.</p> <p>However, there is no mention of High Conservation Value Areas.</p> | <p>We would like to recommend the addition of High Conservation Value Areas (it is appropriate to use this term here) in whichever option is adopted. This is because:</p> <ul style="list-style-type: none"> <li>- HCVRN is in discussions with RTRS about developing a medium risk approach to HCV assessment which will be cost-effective and practical for the RTRS context</li> <li>- Though there may be some overlaps with HCV areas and the other categories like native forests, wetlands, etc. there may be many other cases of HCVs which are not found in this list</li> <li>- Members of the Consumer Goods Forum and other big buyers have made commitments to maintain HCVs in their supply chains. The HCV approach is also making its way into public</li> </ul> |   |  |

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|  |  | <p>procurement: e.g. Swedish authorities already require that soy for animal feed is not produced at the expense of HCVs.</p> <ul style="list-style-type: none"><li>- HCVs are well defined and it is a widely used concept. Since the HCV definitions are listed in the Annex, it would be preferable to also see HCV mentioned in the main P&amp;C text</li></ul> |  |  |
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## Annex 3: Comments received during the 3<sup>rd</sup> Public Consultation

### Comments received during the 3<sup>rd</sup> Public Consultation.

#### Document under Public Consultation: 2nd DRAFT: RTRS Standard for Responsible Production V3.0

Note: Comments are copied and added in this table as they were received. The last column represents the discussion points and conclusions that reflect the work of the Working Group.

Public consultation Period: 18 December 2015 – 1 February 2016 + Extension period: 2 February– 10 February 2016.

3<sup>rd</sup> Physical Meeting RTWG: 29 February & 1 March 2016, Buenos Aires – Argentina.

#### Group Members present at the meeting:

NGOs: WWF - Cassio Franco Moreira; Fundación Vida Silvestre - Ulises Martinez; Fundación Proyungas – Roxana Aragón; Solidaridad - Harry van der Vliet.

Industry: Nidera –Ezequiel Paul.

Producers: Fazendas Brookfield - Luiz Iaquinta; Amaggi - Juliana Lopes; Aapresid – Alejandro O’Donnell

Observers: Nidera -Verónica Weber, Schutter – Julieta Viglioni, HCV Network - Paulina Villalpando.

RTRS Secretariat: Jimena Froján & Daniel Kazimierski

Group Coordinator & Meeting Facilitator: Cecilia Gabutti

#### Companies that participated in the 3<sup>rd</sup> Public Consultation:

Ahold, Asda, COOP, Delhaize, Marks and Spencer, Migros, Sainsbury’s, Tesco, The Co-operative Group, Waitrose, WWF International, Cert ID, Fundación Vida Silvestre, Superunie, National Wildlife Federation, Coop Sweden, Arla Foods, Martin & Servera, Lantmännen, HCV Resource Network, IUCN NL, Axfood, Grain Farmers of Ontario, Danmarks Naturfrednings Forening, Snobelen Farms.

|   | Criterion/Indicator  | Issue   | Proposed solution   | Discussion/<br>Conclusion   |
|---|--|---|---|---|
| 1 | <b>Preamble</b><br><b>Unit of certification:</b><br>The unit of certification shall be the farm on which soy is cultivated and is delimited by the | RTRS certification is competitively disadvantaged when compared, for example, to ProTerra and ISCC certification systems by the unit of certification being | Consider changing the unit of certification and the certification system to mill.<br><br>Additional comment: Another, more flexible, way of handling this may be to look at wording in the Preamble that says something along the lines of: | Conclusion: the group considers that this clarification should be kept in the preamble to avoid misinterpretations, |

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|                    | farm boundaries. This includes fields where soy is cultivated, but also all non-soy growing areas, non-cultivated areas, infrastructure and installations and other areas that form part of the farm (see accreditation and certification requirements A 1.2.1). | defined as the farm. It would help RTRS to be more competitive and scalable if it defined a supply shed, e.g. mill, as the unit of certification and then a rotational risk-based sampling system developed to audit farms that supply a (to be) certified mill.   | "Unit of certification: The unit of certification shall be as defined in the current Accreditation and certification requirements document" (and even, if considered feasible, providing a link to the webpage from which that can be downloaded?!).  | especially in cases of property rental. On the other side as this definition is part of another document, it is outside of the WG's scope to discuss about disadvantages regarding other standards.  |
| <b>Principle 3</b> |  |  |   |  |
| 2                  | 3.2.4 "sites of especial cultural, ecological, economic or religious significance to indigenous people shall be clearly identified in cooperation with such people and recognized and protected by farm managers."   | <p>This indicator does not cover fully HCV 5:<br/> <i>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.</i></p> <p>This is important as there are so many companies and public procurement policies referring to the HCV concept.</p> | <p>Add a criterion that covers HCV 5.</p> <p>It is very important that the P&amp;Cs fully cover protection of HCV 5. We strongly suggest that RTRS contacts the HCV Resource Network to get a "formal" agreement that the RTRS P&amp;C 3.0 fully protects HCV 1-6, (without requiring HCV assessments).</p> | <p>Discussion: the aim of aligning HCV definitions to the indicators is to make the standard HCV compliant without expressly mentioning HCV areas.</p> <p>During the last meeting it was discussed that the mention of HCV creates confusion and rejection among producers, as the concept is associated to complexity and to an expensive process.</p> <p><u>Conclusion:</u> the current indicator 3.2.4 is replaced to make it HCV5 compliant.</p> |

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|   |  |   |  | <p>New 3.2.4:<br/> 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>                                      |
| 3 | <p>3.4 Fair opportunities for employment and provision of goods and services are given to the local population no matter the gender and race.<br/> 3.4.2 If possible there is collaboration with training programs for the local population.</p> | <p>In this new version, RTRS has added “If possible” to this indicator. This phrase may make confusion when different auditors will evaluate this indicator and they can use different criteria to evaluate (what “if possible” in this case means?). In addition, it could be unfair with Certified Organizations, when you compare two different organization, one provide training and another don’t, but both can be certified (are not using the same criteria).</p> | <p>Suggestion 1: Remove “If possible” in this indicator and maybe add in the guidance (or create a note) a description saying in which situations farms don’t need to collaborate with trainings for the local population (e.g.: Farms that don’t have neighbors or farms located in small cities that don’t have training services available, etc.).</p> <p>Suggestion 2: Change the requirement of collaborate with training programs to collaborate with projects of the community. It seems more feasible.</p> | <p>Discussion points:</p> <ul style="list-style-type: none"> <li>- Create guidance for certification bodies to address in which situations this indicator might not apply. For instance in case of:</li> <li>- Smallholders</li> <li>- Farms that do not have neighbors or are very far away from local communities.</li> <li>- In order to understand the indicator 3.4.2 it is necessary to understand</li> </ul> |

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|                    |  |  |  | <p>how the assessment of indicator 4.1.1 was done and how stakeholders have been identified.</p> <p><u>Conclusion:</u> create guidance for the indicator. Guidance 3.4.2 If is not possible to apply this indicator, a justification shall be provided to the auditor.</p> |
| <b>Principle 4</b> |  |  |  |  |
| 4                  | 4.3.4 Opportunities for increasing carbon sequestration through restoration of native vegetation, forest plantations and other means are identified and when possible implemented. | RTRS has included in this indicator “when possible implemented”. As in the case above, the “when possible” may create different interpretation and evaluation criteria among auditors. | Remove “when possible”. The indicator should be writing like this:<br>Opportunities for increasing carbon sequestration through restoration of native vegetation, forest plantations and other means are identified and implemented.   | <u>Conclusion:</u> add the following guidance. If producers cannot apply the identified opportunities for increasing carbon sequestration, a justification shall be given to the auditor.  |
| 5                  | 4.4.1.   | Need to move RTRS to a zero deforestation standard.  | <p><b>A clear and rigorous definition of “natural land types” is included</b> in the glossary in order to avoid misinterpretation and to make sure that RTRS P&amp;C indeed represents a zero conversion standard as of 2016. WWF proposes the following text: <i>“All land with natural, native vegetation, including but not limited to grasslands, savannabs, prairies, Cerrado, and woodlands.”</i></p> <p><b>Additional proposed definitions:</b></p> | <p><u>Discussion:</u><br/>This definition is not complete, natural regeneration should be considered.</p> <p><u>Conclusion:</u><br/>Definition of natural lands: All land with natural, native</p>   |

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|   |   |   | Add a definition for natural land types in the glossary: “All land with natural, native vegetation, including but not limited to grasslands, savannahs, prairies, Cerrado, and woodlands”  | vegetation, including, but not limited to, native forests (according to RTRS definition), riparian vegetation, natural wetlands, grasslands, savannahs, prairies, cerrado and woodlands.  |
| 6 | 4.4.1 For certification under this standard, priority natural lands for conservation have not been cleared or converted into productive areas after May 2009. Priority natural lands include: | A lack of definition for “natural lands” could lead to misinterpretation and reduce the effectiveness of the zero-conversion standard as of 2016. | <p>Include the following definition of natural lands in the glossary of terms:</p> <p>Natural land: All land with natural, native vegetation, including but not limited to grasslands, savannahs, prairies, Cerrado, woodlands, and wetlands.</p>  | <p><u>Conclusion:</u><br/>Definition of natural lands: All land with natural, native vegetation, including, but not limited to, native forests (according to RTRS definition), riparian vegetation, natural wetlands, grasslands, savannahs, prairies, cerrado and woodlands.</p> |
| 7 | 4.4.1.b   | A lack of definition for “natural lands”  | <p>In order to accept 4.4.1.b there must be a clear definition and rigorous definition of “natural land types” is included in the glossary in order to avoid misinterpretation and to make sure that RTRS P&amp;C indeed represents a zero conversion standard as of 2016</p> <p>We propose the wording “<i>All land with natural, native vegetation, including but not limited to grasslands, savannahs, prairies, Cerrado, and woodlands.</i>”</p> | <p><u>Conclusion:</u><br/>Definition of natural lands: All land with natural, native vegetation, including, but not limited to, native forests (according to RTRS definition), riparian vegetation, natural</p>   |

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|   |               |   |  | wetlands, grasslands, savannahs, prairies, cerrado and woodlands.   |
| 8 | 4.4.1 – 4.4.3 | <p>As commented in the previous pc we find it complicated to foresee the consequences of the suggested criterias for expansion of soy cultivation. From a stakeholder point of view we would appreciate a clarification of the expected consequences for the responsible soy supply implementing the criterias proposed. i.e.: How will the suggested criterias impact the land use change and the expected volumes of soy entering the responsible soy supply chain?</p> <p>As a dairy company striving for a responsible feed supply for our dairy farmers we are stressing the importance of both protecting priority natural lands and allowing sufficient volumes of soy entering the responsible soy supply chain and thus not keep the responsible soy in a limited niche.</p> <p>Having said that we would like to support the present proposal with the needed clarification as described below.</p> | A clear and rigorous definition of “natural land types” should be included in the glossary in order to avoid misinterpretation and to make sure that RTRS P&C indeed represents a zero conversion standard as of 2016. | <p><u>Conclusion:</u><br/>Definition of natural lands: All land with natural, native vegetation, including, but not limited to, native forests (according to RTRS definition), riparian vegetation, natural wetlands, grasslands, savannahs, prairies, cerrado and woodlands.</p> |

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| 9  | 4.4.2   | There is no definition of “natural land types”.                  | Add a definition for <u>natural land types</u> in the glossary. Suggestion:<br>All land covered with spontaneous vegetation (not cultivated), including areas that haven’t been cultivated from the last x(?) years, regardless if they have reached the original native species composition or not. | <u>Conclusion:</u><br>Definition of natural lands: All land with natural, native vegetation, including, but not limited to, native forests (according to RTRS definition), riparian vegetation, natural wetlands, grasslands, savannahs, prairies, cerrado and woodlands. |
| 10 | 4.4.2 All natural land types not included in the areas listed in 4.4.1.a or 4.4.1.b no conversion is allowed after 2016 | There is a need to provide a definition of “natural land types”. | Include the following definition (recommended by WWF) in the glossary:<br>Natural Land Types: All land with natural, native vegetation, including but no limited to grasslands, savannahs, prairies, Cerrado and woodlands.  | <u>Conclusion:</u><br>Definition of natural lands: All land with natural, native vegetation, including, but not limited to, native forests (according to RTRS definition), riparian vegetation, natural wetlands, grasslands, savannahs, prairies, cerrado and woodlands. |
| 11 | 4.4.1/4.4.2   | Definitions in glossary for natural land types                   | We can accept 4.4.2 under condition there is a rigorous definition of natural land types in glossary.<br><br>For example: All land with natural, native vegetation, including but not limited to grasslands, savannahs, prairies, Cerrado, and woodlands.  | <u>Conclusion:</u><br>Definition of natural lands: All land with natural, native vegetation, including, but not limited to,   |

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|    |   |  |   | native forests (according to RTRS definition), riparian vegetation, natural wetlands, grasslands, savannahs, prairies, cerrado and woodlands.   |
| 12 | 4.4.2 Expansion of soy cultivation is responsible   | There is no definition of “natural land types”.  | A solid definition for <u>natural land types</u> is needed, ensuring the inclusion of natural wood lands and grasslands.  | <u>Conclusion:</u><br>Definition of natural lands: All land with natural, native vegetation, including, but not limited to, native forests (according to RTRS definition), riparian vegetation, natural wetlands, grasslands, savannahs, prairies, cerrado and woodlands. |
| 13 | 4.4.1.a<br>a) Where RTRS maps are available, all areas included in category I of the maps | But category II could also contain areas with high importance for biodiversity where – according to earlier versions of that standard: expansion of soy is only carried out after an HCV assessment which determines if HCVs are present and (if present) identifies areas for conservation and areas where expansion can occur. Should more be mentioned about RTRS maps here or in an annex? | <u>Conclusion:</u> the new 4.4 does not allow any conversion of natural lands from June 2016 on. Therefore there is no need for carrying out an HCV assessment. | <u>Conclusion:</u><br>The group agreed to keep the text without mentioning category II of the RTRS maps. The new 4.4 does not allow any conversion of natural lands from June 2016 on. Therefore there is no need to carry out an HCV assessment.                         |

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| 14 | 4.4     | 4.4.1 b) doesn't make reference to CAT II and doesn't fulfil the previous wording referring to HCVAAs. | <p>A. Suggested reformulations:</p> <p>4.4.1.b <b>For Category II areas on RTRS maps and</b> where RTRS maps are not available the following areas:</p> <p>a) native forests (see glossary),<br/> b) riparian vegetation,<br/> c) natural wetlands, <b>(see glossary)</b><br/> d) steep slopes,<br/> e) areas with high below ground carbon stocks<br/> f) areas designated by law to serve the purpose of native conservation and/or cultural and social protection.</p> | <p>Conclusion:</p> <p>The group agreed to keep the text without mentioning category II of the RTRS maps. <u>The new 4.4 does not allow any conversion of natural lands from June 2016 on. Therefore there is no need to carry out an HCV assessment.</u></p> |
| 15 | 4.4.1.b |  | <p>Related to 4.4.1.b, WWF also proposes to include the following text (our additions are marked in red):<br/> <b>“For Category II areas on RTRS maps and</b> where RTRS maps are not available the following areas...”<br/> We recommend this change in order to avoid clearance of high priority areas within Category II due to possible lack of accuracy of the maps.</p>   | <p>Conclusion:</p> <p>The group agreed to keep the text without mentioning category II of the RTRS maps. <u>The new 4.4 does not allow any conversion of natural lands from June 2016 on. Therefore there is no need to carry out an HCV assessment.</u></p> |
| 16 | 4.4.1.b |  | <p>Related to 4.4.1.b, it is proposed to include the following text: <b>“For Category II areas on RTRS maps and where RTRS maps are not available the following areas...”</b> We recommend this change in order to avoid clearance of high priority areas within Category II due to possible lack of accuracy of the maps.</p>  | <p>Conclusion:</p> <p>The group agreed to keep the text without mentioning category II of the RTRS maps. <u>The new 4.4 does not allow any conversion of natural lands from June</u></p>   |

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|    |  |   |  | 2016 on. Therefore there is no need to carry out an HCV assessment.   |
| 17 | 4.4.1.b  | Maps Category I and where maps are not available. However, it does not address Category II maps, leaving the priority natural lands listed in bullets a-f that fall under Category II in jeopardy if maps are inaccurate. Priority areas in Category II should be duly addressed in this indicator. | Amend 4.4.1.b to read:<br><br>4.4.1.b <b>For Category II areas on RTRS maps and</b> where RTRS maps are not available the following areas:<br><br>a) native forests (see glossary),<br>b) riparian vegetation,<br>c) natural wetlands(see glossary),<br>d) steep slopes,<br>e) areas with high below ground carbon stocks<br>f) areas designated by law to serve the purpose of native conservation and/or cultural and social protection. | Conclusion:<br>The group agreed to keep the text without mentioning category II of the RTRS maps. <u>The new 4.4 does not allow any conversion of natural lands from June 2016 on. Therefore there is no need to carry out an HCV assessment.</u>                                     |
| 18 | 4.4.1.a<br>f) areas with high below ground carbon stocks | How are these areas identified? Not generally included in your standard EIA.  |  | Discussion:<br>There is not lot of available information regarding definitions of this concept. Most of the information found about high below ground carbon stocks are related to peatlands. Peatlands protection is already covered in the standard under the definition of natural |

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|    |   |   |   | <p>wetlands.<br/>This does not represent at the moment an issue for RTRS. If there is a need in the future to review and include this concept in the standard, this can be analyzed later.</p> <p><u>Conclusion:</u> Exclude from the list “f) areas with high below ground carbon stocks”</p> |
| 19 | <p>4.4.1.b Where RTRS maps are not available the following areas:<br/>a) native forests (see glossary), b) riparian vegetation, c) natural wetlands, d) steep slopes, e) areas with high below ground carbon stocks f) areas designated by law to serve the purpose of native conservation and/or cultural and social protection.</p> | <p>We accept this indicator exactly as written in Draft 3 of RTRS Production Standard version 3.0. However we are aware of a proposal to add “Category II areas on RTRS maps” to indicator 4.4.1.b, which we do not accept. As the indicator is written in draft 3, it allows producers to use their lands that are on category II if there was legal deforestation in the period from 2009-2016. The proposal to add “Category II areas” to this indicator changes the entire discussion, because it will prevent the areas in category II from becoming certified. This is totally different from the proposal, which we understand was the consensus reached at the December working</p> | <p>Keep this indicator exactly as written in Draft 3 of RTRS Production Standard version 3.0.</p> | <p><u>Conclusion:</u><br/>The group agreed to keep the text without mentioning category II of the RTRS maps. The new 4.4 does not allow any conversion of natural lands from June 2016 on. Therefore there is no need to carry out an HCV assessment.</p>                                      |

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|    |                                  | group meeting.   |   |  |
| 20 | 4.4.1.b Native Forest definition | <p>The following definition of “Native forests” in the Glossary is rather artificial and could not be implemented in practice in the development of the RTRS maps:</p> <p>“Areas of native vegetation of 1ha or more with canopy cover of more than 35 % and where some trees (at least 10 trees per hectare) reach 10m in height (or are able to reach these thresholds in situ (ie. In that soil/climate combination)).”</p> | <p>Recommend to change the definition to whatever definition of “native forests” was applied in the development of the RTRS maps. So that the revised RTRS Standard will match the maps that have been developed and will be easier to implement in practice.</p> | <p><u>Conclusion:</u><br/> This comment was already discussed during the second meeting of the group. The maps in different countries were developed using different native forest definitions and considering available information and particularities of the country. Therefore it is impossible to provide a common definition of native forest based on the maps’ approach. The group considers important to keep the current forest definition for all those countries where maps are not available.<br/> National Interpretations also require that the native forest definition of the standard has to be complemented with national and regional definitions of native forests. For this reason</p> |

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|    |   |   |   | the definition of native forests will vary according to the particularities and conditions of each country.  |
| 21 | 4.4.2 For all natural land types not included in the areas listed in 4.4.1.a or 4.4.1.b, no conversion is allowed after 2016. | The conversion cut-off date should be July 2016.  | Amend the indicator to read:<br><br>4.4.2 For all natural land types (see glossary) not included in the areas listed in 4.4.1.a or 4.4.1.b, no conversion is allowed after <b>July 2016.</b>  | Decision: to keep the month of the General Assembly June 2016<br><br>Note: the Executive Board might consider also being more specific and adding a specific date. |
| 22 | 4.4.2   |   | 4.4.2 For all natural land types (see glossary) not included in the areas listed in 4.4.1.a or 4.4.1.b, no conversion is allowed after <b>July 2016.</b>  | Decision: to keep the month of the General Assembly June 2016<br><br>Note: the Executive Board might consider also being more specific and adding a specific date. |
| 23 | 4.4.2 All natural land types not included in the areas listed in 4.4.1.a or 4.4.1.b no conversion is allowed after 2016       | However this risks attracting criticism to our Round Table that we are setting too high a “gold standard” that will potentially exclude development in frontier zones etc.<br><i>So at the same time as putting this forward, RTRS must offer an alternative tool to full RTRS certification for those areas, which</i> | Communication about the new 4.4 should include that the new RTRS Production standard:<br><ul style="list-style-type: none"> <li>- enables RTRS to certify zero deforestation</li> <li>- makes RTRS certification clearer, simpler and less costly to implement, as HCVA Assessments are no longer required where there are no RTRS approved maps</li> <li>- estimated impact of the new standard in terms of deforestation / no deforestation.</li> </ul> <i>And</i> (subject to RTRS Executive Board approval, | <u>Conclusion:</u> this comment is aligned with the WG’s thinking.   |

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|    |               | <p>de-risks from the worst deforestation and land rights abuses, e.g. an Area or Jurisdiction or Landscape approach (noting that RTRS Executive Board approved a Community approach trial in September 2015).</p> <p>Clear communication about both the change in the RTRS Production Standard (especially 4.4) <i>and</i> a new alternative approach is essential for the GA10 and RT11 in June 2016. We understand that to develop this is beyond the scope of the Review, but encourage the working group to send a clear request back to RTRS to commission its development.</p> | <p>hopefully in March!) that RTRS is committed to: Developing an alternative mechanism to de-risk supply chains from illegal deforestation and land rights abuses for conversion in areas that cannot meet its “zero deforestation” standard.</p> |   |
| 24 | Guide for 4.4 | <p>Delete first 3 paragraphs<br/>See if there will be a space for PES Mechanism in the new standard and if so, move the last paragraph accordingly.</p>  |   | <p><u>Conclusion:</u> Guide has been adapted to the new 4.4.</p> <p>Data capture requirements have been maintained in the guidance.</p>           |
| 25 | Annexes       |  | <p>The 4.4 annexes and references to the existing RTRS P&amp;C documentation must be revised and re-worded as they do not yet reflect the “new” 4.4 .</p>   | <p><u>Conclusion:</u> Old annex 4 has been replaced by a guidance developed by the RTRS regarding the use of the maps and updated by this WG.</p> |
| 26 | Annex 1       | <p>. 4.4. is not updated and the content refers to v2. This means that these points will not have been out for</p>   | <p>Develop new relevant guidance. This should be sent out for consultation</p>  | <p><u>Conclusion:</u> there is no possibility to go for another PC period.</p>  |

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|    |                   | consultation which is not appropriate  |   |  |
| 27 | Annex             | Review Annex 1 and Annex 4 accordingly to new 4.4.   | .   | <p><u>Conclusion I:</u> Old annex 4 has been replaced by a guidance developed by the RTRS regarding the use of the maps and updated by this WG.</p> <p><u>Conclusion II:</u> Guidance has been adapted to the new 4.4.</p> <p><u>Conclusion III:</u> Data capture requirements have been maintained in the guidance.</p> |
| 28 | Annex 1           | All annexes need to be updated to reflect the newest iteration of principle 4.4.   | Update annexes  | <p><u>Conclusion:</u> Guide has been adapted to the new 4.4.</p> <p>Data capture requirements have been maintained in the guidance</p>   |
| 29 | Old annex 4       | Important to make reference to current RTRS-approved maps in order to explain how the existing maps were develop and how they refer to the rules for expansion between 2009 and 2016 which define eligibility for certification. | Update the original Annex 4 and include it again and make a reference to it under Criterion 4.4. in the standard. | <u>Conclusion:</u> Old annex 4 has been replaced by a guidance developed by the RTRS regarding the use of the maps and updated by this WG.   |
| 30 | Annex: Integrated | This wording opens the possibility   | Revise this second sentence under 5b):  | <u>Conclusion:</u> the   |

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|    | <p>Crop Management (ICM) 5. chemical crop protection</p> <p>5.b) Exceptions are allowed regarding the application in a preventive way when qualified agronomists recommend this practice due to exceptional conditions.</p> | <p>for all kind of pesticide application and contradicts the Integrated Crop Management approach.</p> | <p>5.b) Application of phytosanitary products only if the economic damage threshold is exceeded. <del>Exceptions are allowed regarding the application in a preventive way when qualified agronomists recommend this practice due to exceptional conditions.</del>—Exceptions regarding the application in a preventive way can be given by the certification body after a written application explaining the exceptional conditions.</p> | <p>indicator is replaced by its original version, however the word “exceeded” is replaced by “reached” as follows:<br/>5.b) Application of phytosanitary products only if the economic damage threshold is REACHED.</p> |
| 31 | Intro, page i, Under National interpretation  | Typo: refers to Annex 6, should be annex 5.   | Fix typo  |   |
| 32 | New additions   |   | Add guidance on means of verification for 4.4.  | <u>Conclusion:</u> the means of verification of the different indicators are part of the RTRS Accreditations and Certification requirements, therefore out of the scope of the work of this WG.                         |
| 33 | New additions   | Means of verification for Principle 4.4 are not included in this document                             | Add guidance on the means of verification for Criteria 4.4  | <u>Conclusion:</u> the means of verification of the different indicators are part of the RTRS Accreditations and Certification  |

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|    |   |   |   | requirements, therefore out of the scope of the work of this WG.  |
| 34 | New additions   | Means of verification for Principle 4.4 are not included in this document   | Add guidance on the means of verification for Criteria 4.4  | <u>Conclusion:</u> the means of verification of the different indicators are part of the RTRS Accreditations and Certification requirements, therefore out of the scope of the work of this WG.   |
| 35 | Update the definition of HCV  | Use the definition of the HCV RN<br><a href="https://www.hcvnetwork.org/about-hcvf/the-six-high-conservation-values">https://www.hcvnetwork.org/about-hcvf/the-six-high-conservation-values</a>           |   | <u>Conclusion:</u> definitions have been updated.   |
| 36 | 4.4 Expansion of soy cultivation is responsible.<br>4.5 On-farm biodiversity is maintained and safeguarded through the preservation of native vegetation.<br>4.4.1 and 4.4.2<br>4.5.1 – 4.5.4 | The HCV Resource Network is concerned that the HCV concept has been completely removed from P4 and would like to propose a new formulation for P4 that is based on the earlier draft (draft 1 version 3). | 4.4 Expansion of soy cultivation is responsible.<br>4.5 On-farm biodiversity is maintained and safeguarded through the preservation of native vegetation.<br>4.4.1 and 4.4.2<br>4.5.1 – 4.5.4 | <u>Conclusion:</u><br>The Group has decided to avoid mentioning HCV concepts in the standard but to include the protection of this high conservation values in the requirements with the objective of having an HCV protection compliant standard but not mentioning them as HCVs |
| 37 | 4.4.1 a HCVA<br>4.4.1.a Where RTRS maps are   | There is no reference in Draft 3 of the Standard v3.0 to how Category I of the maps are defined. Add  | 4.4.1 a HCVA<br>4.4.1.a Where RTRS maps are available: all areas included in category I of the maps   | <u>Conclusion:</u> A new annex references the new 4.4 and the maps.   |

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|    | available: all areas included in category I of the maps | revised working definitions of maps categories to the Annex, revised according to the new 4.4.2.   |                |  |
| 38 | HCV protection  | <p>The new P&amp;Cs does not fully ensure the protection of HCV (according to the HCV Resource network).</p> <p>This is important as HCV protection is part of our sourcing policies and Swedish public procurement policies.</p>  | HCV protection | <p><u>Conclusion:</u><br/>The Group has decided to avoid mentioning HCV concepts in the standard but to include the protection of this high conservation values in the requirements with the objective of having an HCV protection compliant standard but not mentioning them as HCVs.</p> |
| 39 | HCVA  | <p><i>We understand that HCV assessments no longer will be needed as no conversion will be allowed on natural vegetation areas. However for us it is crucial that the RTRS standard fully protects HCV 1-6 and that this is publically communicated. If there are any aspects in the standard that are missing in order to fully protect HCV 1-6 we ask the RTRS standard working group to make the amendments or additions needed. Many companies have an HCV-policy and it is a recommended requirement in the Swedish public procurement framework.</i></p> | HCVA           | <p><u>Conclusion:</u><br/>The Group has decided to avoid mentioning HCV concepts in the standard but to include the protection of this high conservation values in the requirements with the objective of having an HCV protection compliant standard but not mentioning them as HCVs.</p> |

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| 40 | 4.4 HCV assessment | <p>For us it is crucial that the RTRS standard fully protects HCV 1-6 and that this is publically communicated. If there are any aspects in the standard that are missing in order to fully protect HCV 1-6 we ask the RTRS standard working group to make the amendments or additions needed. Many companies have an HCV-policy and it is a recommended requirement in the Swedish public procurement framework.</p> <p>The HCV framework does make it possible for Swedish companies to buy soy products direct (food) or indirect (feed).</p> | 4.4 HCV assessment  | <p><u>Conclusion:</u><br/>The Group has decided to avoid mentioning HCV concepts in the standard but to include the protection of this high conservation values in the requirements with the objective of having an HCV protection compliant standard but not mentioning them as HCVs.</p> |
| 41 | 4.4 HCVA           | <p>Definition of HCVA and its method is lacking here. It can be made more simple, but not as un-nuanced as now.</p>  | <p>I think still reference should be made to HCV categories when talking about natural lands, as HCVA is much more nuanced. What we miss here is important areas for livelihoods and cultural and spiritual values, and, for example a distinction between any grassland and high biodiversity grassland. We know HCV criterion was complicated but you can help by just listing the 6 categories in clear terms and say that IF clearance takes place, it should be done after a professional HCV assessment. It is madness if a farmer cannot open land grown over by weed.</p> <p>I like that categories broadly agreed with to conserve such as riparian vegetation, wetlands etc are spared, but any natural land is not necessary. It</p> | <p><u>Conclusion:</u><br/>The Group has decided to avoid mentioning HCV concepts in the standard but to include the protection of this high conservation values in the requirements with the objective of having an HCV protection compliant standard but not mentioning them as HCVs.</p> |

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|  |  |  | <p>will further shy away farmers in risk zones where RTRS wants to make a difference.</p> <p>Rather, as said, explain HCV categories in clear terms and invest, with RTRS members' money, in having trainers and assessors for a "quick and clean" HCV assessment at reasonable cost. It is to their own benefit at last: safeguard important natural values and have farmers on board.</p> <p>I know there was discussion too on compensation. It is indeed to early to include. I would however recommend to install already in 2016 a long-term working group on compensation, restauration and restitution to be ready for the next 5 year P &amp; C review. To take on board those farmers who are willing to repair their environmental and social debt by money and compensatory action that are really just and ecologically defendable.</p> <p>I also hope RTRS will continue researching and implementing, possibly with other good standards, a PES mechanism for above-legal conservation in important areas for biodiversity and biological corridors. This may come in part from certificates, from donor money, funds such as Trust Funds, and from government for example in the form of green taxes. All leading to long-term agreements with farmers to compensate their HCVAs, either or not in an existing legal category such as private reserves.</p> <p>Good luck in remaining the best standard for soy!</p> |  |
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| 42 | 4.4 HCVA   | <p>We understand that HCV assessments no longer will be needed as no conversion will be allowed on natural vegetation areas. However for us it is crucial that the RTRS standard fully protects HCV 1-6 and that this is publically communicated. If there are any aspects in the standard that are missing in order to fully protect HCV 1-6 we ask the RTRS standard working group to make the amendments or additions needed. Many companies have an HCV-policy and it is a recommended requirement in the Swedish public procurement framework.</p> |  | <p>Conclusion:<br/>The Group has decided to avoid mentioning HCV concepts in the standard but to include the protection of this high conservation values in the requirements with the objective of having an HCV protection compliant standard but not mentioning them as HCVs.</p>                               |
| 43 | <p>4.5.1 There is a map of the farm which shows the native vegetationproductive areas and water courses (see 5.2.1).</p> |   | <p>Suggestion:<br/>4.5.1 There is a map of the farm which shows the native vegetation, any of the priority conservation areas listed in 4.4.1.a, productive areas and water courses (see 5.2.1).</p> | <p>Discussion:<br/>4.4.1.a references the RTRS maps. The scale of the maps could be a problem when these maps have to be translated into the scale of a farm plan. The maps are not available in many countries. There is already a requirement that the map of the farm needs to show the native vegetation.</p> |

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| 44 | 4.5.2 There is a plan, which is being implemented, and monitored to ensure that the native vegetation and wildlife are being maintained (except areas covered under Criterion 4.4) | Why does it say? (except areas covered under Criterion 4.4) Are these priority areas NOT included in the plan? | Eliminate “except areas covered under Criterion 4.4”<br>These areas should be part of the plan.  | Conclusion I: to eliminate “except areas covered under Criterion 4.4).<br>Conclusion II: to add in the guidance, which is the minimum content of the requested monitoring plan.<br>Conclusion III: to adapt the guidance developed by Fundación Vida Silvestre and add it as an example in a new annex. |
| 45 | 4.5.3 No hunting of rare, threatened or endangered species takes place on the property.  |  | Suggestion:<br>4.5.3 No hunting or collecting of rare, threatened or endangered species takes place on the property.                         | Conclusion: In order to cover and protect HCV 1 and 3 the indicator 4.5.3 is replaced by: Rare, threatened or endangered species permanently or temporary present at the property are protected. Hunting or collecting of these species is not allowed.   |
| 46 | 4.5.3 No hunting of rare, threatened or endangered species takes place on the  | With this writing RTRS does not fully cover HCV1 and it is too weak.<br>The current standard does not fully    | It is very important that the P&Cs fully cover protection of HCV 1. We strongly suggest that RTRS contacts the HCV Resource Network to get a | Conclusion: In order to cover and protect HCV 1 and 3 the indicator 4.5.3 is replaced by:   |

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|    | property  | represent proxies for HCV 1-6. This is important as there are so many companies and public procurement policies referring to the HCV concept.<br>Additional criteria must be added to cover HCV1. Amendments of 4.5.3 (HCV 1) are needed.   | “formal” agreement that the RTRS P&C 3.0 fully protects HCV 1-6, (without requiring HCV assessments).  | Rare, threatened or endangered species permanently or temporary present at the property are protected. Hunting or collecting of these species is not allowed.   |
| 47 | 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 or out of the farm to promote wildlife and restoration of native vegetation. | If farmers comply with 4.4 and 5.2 but have less than 10% native vegetation it is not justifiable to make them pay out of their own pocket to promote restoration of native vegetation on or off the farm.<br><br>The farmers would be put at a significant disadvantage. If a farmer has a 100 hectare farm and only 9 hectares is in natural native vegetation and the remaining 91 hectares is farmed it is unjustifiable to make him take land out of production to meet this indicator goal of at least 10% native vegetation. | Remove this indicator completely as it is unjustifiable for the Canadian agricultural industry and could hinder our farmers. A lot of our farmers do proactively implement a number of tree planting or restoration project on their own accord. Forcing them to do so meet this indicator would be very problematic and is unadvisable. | Discussion:<br><br>- Is it possible to have an exception for small producers?<br><br>- If exceptions are made, they should be made for “smallholders”.<br><br>- Creating additional concepts will create additional complexity in the standard. The standard already has concepts like “small producers”, and “family farming”.<br><br>- Leave it as it is. If they don’t have inside farm vegetation they should promote it.<br><br>In case of small |

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|    |   |  |   | <p>producers in a group certification this could be applicable at group level.</p> <p>Small farmers are defined at National Interpretation level.</p> <p><u>Conclusion:</u> add a guidance that allows producers to get together in order to promote conservation activities. This will reduce efforts and costs.</p> <p>Producers can comply with this indicator at a group level (group of producers that get together in order to comply with the indicator).</p> |
| 48 | 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 |  | <p><b>Suggestion:</b><br/>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 <b>around</b> of the farm in order to promote wildlife and restoration of native vegetation.</p> | <p><u>Conclusion:</u> the word “around” has been added.</p>  |

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|                    | implement and promote conservation activities in or out of the farm in order to promote wildlife and restoration of native vegetation |   |  |  |
| <b>Principle 5</b> |   |   |  |  |
| 49                 | 5.1.2<br>There is a plan that includes monitoring and mitigation measures according to the identified risks and applicable to scale.  | There needs to be further clarification on this and exactly what it means.<br>Currently, a number of legislation exists in Canada to limit risk to both surface and groundwater. These include:<br>Canada Water Act (R.S.C. 1985, c. C-11) Canada Water Rights Act (C.C.S.M. c. W80) Manitoba Drinking Water Safety Act (C.C.S.M. D101) Manitoba Ground Water and Well Water Act (C.C.S.M. c. G110) Manitoba Water Protection Act (C.C.S.M c. W65) Manitoba Water Resources Conservation Act (S.M. 2000, c. 11(C.C.S.M. W72)) Ontario Clean Water Act, 2006 (S.O. 2006, c. 22) Ontario Drainage Act (R.S.O 1990, c. D.17) Ontario Water Resources Act (R.S.O 1990, c. O.40) Ontario Safe Drinking Water Act, 2002 | Further clarification and what this means for our farmers. | <u>Conclusion:</u><br>The wording of the indicator is clear enough. An example on how to develop a plan that includes monitoring could be seen in the new annex 5. |

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|    |  | (S.O. 2002, c 32) Prince Edward Island Water and Sewerage Act, 2002 (R.S.P.E.I. 1988, c. U-5) Quebec Watercourses Act (R.S.Q. c. R-13)<br>Furthermore, Conservation Authorities (CA's) administer water quality monitoring throughout Ontario which is a proactive process to assess water quality risks for both surface and groundwater. |  |  |
| 50 | 5.3.4 There shall be an implemented crop rotation plan in order to avoid soy planted immediately over soy and promote a gap in the same field. | In some places where only succession cropping is practiced (corn generally succeeds soybean), the rotation term used in this criteria may be confused with succession cropping.  | - Suggestion 1: Include " Succession cropping such as soybean-corn crop succession is also considered valid".<br>In this case, succession cropping would be contemplated, once that the aim of this criteria seems to be maintain the soil covered.<br><br>- Suggestion 2: If the objective of the indicator is promoting the crop rotation system, it should be clearly specified that crop rotation shall be done including a minimum number of species for a determined period. Otherwise, the implementation of this plan should consider the economic aspects along with the region's specific climatic and agro-ecological conditions. | <u>Conclusion:</u> the indicator allows any kind of crop rotation. The objective of this indicator is to avoid soy planted <u>immediately</u> after soy. |
| 51 | 5.6.2 The use of Paraquat and Carbofuran is eliminated by June   | This note is not acceptable! RTRS should hold on to the 100 % elimination date June 2017 of Paraquat and Carbofuran. There should not be any opportunities for   | Hold on to the 100 % elimination date June 2017 of Paraquat and Carbofuran.  | <u>Conclusion:</u> the group already discussed the note during the second meeting of the RTWG. The group decided to                                      |

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|    | <p>2017.</p> <p>Note for 5.6.2: In the Case of Paraquat, the deadline for the prohibition for its use by June 2017 could be extended by the RTRS if enough evidence is put forward and is send to the RTRS Secretariat before June 2016 to demonstrate that at the time there are still no alternatives in the market (globally or locally), that can substitute it with less environmental and human risks and with similar costs.</p> | <p>keep using these agrochemicals, which have been found highly negative for the environment and humans. The phasing out period has been long enough for producers to be prepared to make a change in their agricultural practices. If the practices should be GOOD Agricultural Practices, improvements have to be implemented.</p> |  | <p>leave the note without modifications.</p>  |
| 52 | <p>5.6.4: The use of products in the WHO list 1a and 1b should be controlled, if possible reduced according an ICM plan developed by the producer,</p>  | <p>The requirements are already mentioned in the standards 5.4.2 and 5.5., and this standard is still not excluding the pesticides which are most harmful for humans.</p>  | <p>Proposed New 5.6.1:<br/>There is no use of agrochemicals listed in the Stockholm and Rotterdam Convention, WHO 1 a and b;</p> | <p>Discussion: this was discussed during the last meeting. Members of the group reached an agreement.</p> <p>The indicator 5.6.2 is more restrictive than 5.6.4. With the new</p> |

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|    | which explains on what specific circumstances the use of this products is allowed. |  |  | <p>indicator 5.6.4 the group has given more flexibility than restriction.</p> <p><u>Conclusion:</u> eliminate indicator 5.6.4</p>  |
| 53 | 5.6.5  | <p>The proposal to exclude the use of highly hazardous pesticides in general was not accepted in the P&amp;C review. However the use of highly hazardous pesticides has to be reduced as soon as possible for social and environmental reasons. Therefore we suggest a compromise to exclude this kind of pesticides in the context of the use of “desiccation”, as this practice can easily be replaced by good agricultural management practices (e.g. selection of varieties, etc.)</p> | <p>5.6.5. For the desiccation (application before harvest) there are no agrochemicals used which are listed in the Stockholm and Rotterdam Convention, WHO 1 a and b, WHO 2 and in the PAN international list of highly hazardous pesticides (recent version: <a href="http://www.pan-germany.org/download/PAN_HHP_List_150602_F.pdf">http://www.pan-germany.org/download/PAN_HHP_List_150602_F.pdf</a>)</p> | <p>Discussion points:</p> <ul style="list-style-type: none"> <li>- Some group members considered that RTRS needs to send a message to the market so new products are developed. This comment comes from the demand side that is expecting to see this kind of prohibitions in the standard.</li> <li>- On the other hand many members of the group think that prohibitions only affect the capacity from RTRS to attract more producers, the number of producers that are certified is not enough to push the agrochemical companies to develop or invest in new less</li> </ul> |

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|  |  |  |  | <p>toxic products.</p> <p>- The addition of this new indicator affects more the producers than the benefits that its implementation may produce. - Most of the prohibited agrochemicals proposed in this indicator are already covered for all activities and not only for desiccation.</p> <p>Rotterdam and Stockholm are already banned, for the potential harmful phytosanitary products we have indicator 5.6.2 that requires targets for reduction and regarding the PAN list it was already agreed by the group that this list has none scientific base, therefore the group will not accept to include this in the standard.</p> <p>Lastly the most used product for desiccation</p> |
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|    |   |  |   | <p>is Paraquat, which is also prohibited in another indicator from June 2017 on.</p> <p>Conclusion: The group did not reach a consensus. Because of lack of industry representatives, there was no quorum to vote in this regard. Therefore this issue remains as an “open issue” and it will be presented to the Executive Board, so they can decide whether to include this or not in the standard.</p> <p>Note: the Executive Board decided not to include this proposal during its meeting on the 14 of March, 21016, in Amsterdam.</p> |
| 54 | 5.9.5 There is no application of pesticides within 30 meter of any populated areas or water bodies. | We are proposing a reduction in the buffer requirement. We feel the existing programs offered by the province, both voluntary and mandatory, are sufficient in terms of managing drift and contamination of both pesticides and waste. | 5.9.5 There is no application of pesticides within 30 meter of any populated areas or water bodies. | Conclusion: this is considered by the group as matter of safety, the indicator remains the same.  |

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|    |   | <p>Some examples are:</p> <ul style="list-style-type: none"> <li>• The Environmental Farm Plan, is a compulsory program for any farmers registered for farm insurance in Ontario. This programs helps farmers and families assess, address and correct issues with an environmental impact in up to 23 different areas on their farm. This programs provides them with buffer calculator tools.</li> <li>• The Grower Pesticide Safety course is mandatory to anyone who purchases pesticides. It provides applicators with the knowledge needed to take appropriate measures for safe handling and application of pesticides.</li> <li>• Health Canada’s Pest Management Regulatory Agency has a free buffer tool that provides farmers with accurate buffer measurements based on real time conditions.</li> </ul> |   |   |
| 55 | <ul style="list-style-type: none"> <li>• 5.9.5 There is no application</li> </ul> | <ul style="list-style-type: none"> <li>• To purchase pesticides in Ontario it is required that farmers become certified</li> </ul>   | <ul style="list-style-type: none"> <li>• 5.9.5 There is no application of pesticides within 30 meter of any populated areas or water bodies.</li> </ul> | <p><u>Conclusion:</u> the group considers that independently of the</p> |

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|  | <p>of pesticides within 30 meter of any populated areas or water bodies.</p> | <p>through the “Grower Pesticide Safety Course.” This course is required by all farmers who purchase pesticides and needs to be renewed every 5 years.</p> <ul style="list-style-type: none"> <li>• This “Grower Pesticide Safety Course” ensures that farmers take the appropriate measures for the safe handling and application of agrochemicals on their farms.</li> <li>• The “Grower Pesticide Safety Course” trains farmers on the proper procedures for agrochemical applications taking into consideration the pest or disease being dealt with, weather conditions, etc.</li> <li>• Canada is a very low risk country and our farmers adhere to some of the most stringent agrochemical regulations in the world.</li> <li>• Furthermore, Health Canada’s Pest Management Regulatory Agency (PMRA) has a free buffer tool online that gives farmers an accurate buffer zone based on the current conditions and proximity to populated</li> </ul> |  | <p>related laws and training courses, the 30 meters distance from populated areas and water bodies is a must for security. The indicator remains the same, without modifications.</p> |
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|  |  | <p>areas, water bodies and terrestrial ecosystems.</p> <ul style="list-style-type: none"> <li>It is very problematic with a no application of pesticides within 30 meter of any populated areas. This is very problematic as field sizes range significantly. For instances, in Ontario, a field could be as small as 15 acres (6.07 hectares). In a field that is only 15 acres (6.07 hectares) maintaining a 30 meter buffer would take up a significant portion of the field.</li> </ul> <p>For Canadian agriculture, we see the 30 meter buffer as very unrealistic and would cause significant problems in becoming RTRS certified.</p> |  |  |
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## Annex 4: Pictures from the Meetings

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