

SUMMARY OF THE STAKEHOLDER FEEDBACK: FIRST PUBLIC CONSULTATION

Rainforest Alliance Sustainable Agriculture Standard

17th December 2018 -28th February 2019

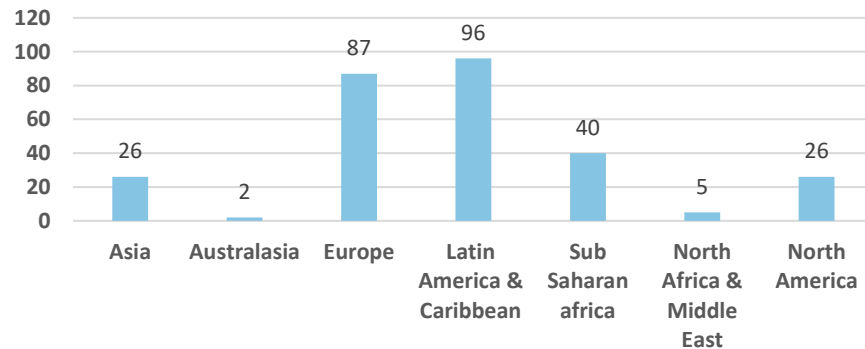




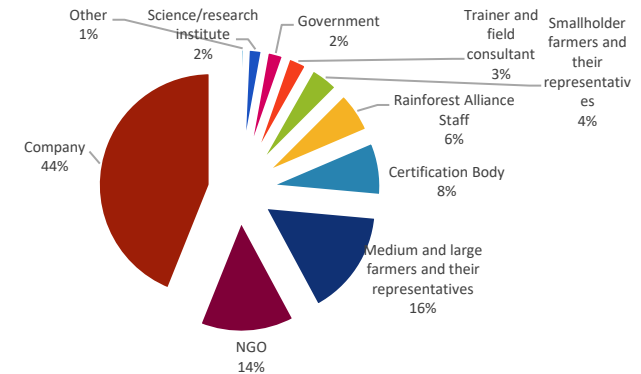
INTRODUCTION

From 17th December 2018 until 28th February 2019, the Rainforest Alliance hosted a public consultation survey to gain valuable feedback from our stakeholders on the first draft for the Rainforest Alliance Sustainable Agricultural Standard. Over 280 stakeholders from over 50 countries responded in four survey languages: English, Spanish, Portuguese, and French. The respondents represented views from over 200 organizations ranging from companies, NGOs, Farmers representatives, governments and research institutes. In addition, nearly 40 consultation workshops were conducted around the globe.

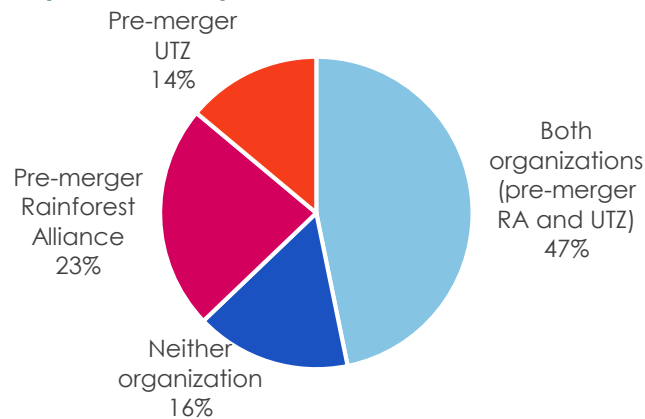
Respondents as per region



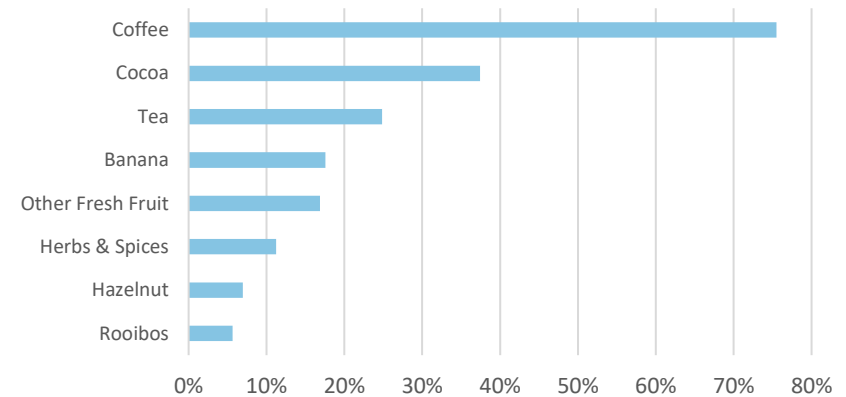
Respondents by Stakeholder Groups



Previous Respondents Experience with UTZ and Rainforest Alliance



Crops that Respondents worked with





PLEASE INCLUDE SOME STATISTICS ABOUT THE CONSULTATION WORKSHOPS (WHICH COUNTRIES / HOW MANY PARTICIPANTS / STAKEHOLDER GROUPS)

SUMMARY OF THE FEEDBACK AND OUTCOME

1) OVERALL FEEDBACK ON THE STRUCTURE OF THE STANDARD

a) The distinction between Smallholders and Medium-Large farmers

Topic	Summary of Feedback	Outcome	Further Explanation
Definition of a smallholder	<ul style="list-style-type: none">• Global level definition of smallholders is unrealistic due to vast differences in regions	<ul style="list-style-type: none">• Concept of smallholder is now described with a series of attitudes. The primary reference is the type of labor used.	<ul style="list-style-type: none">• This approach allows flexibility of what is understood as a smallholder in different regions.
Workers hired by smallholders	<ul style="list-style-type: none">• Many smallholders hire workers	<ul style="list-style-type: none">• Basic requirement for all workers (including those hired by smallholders) in both smallholders and med-large standard	<ul style="list-style-type: none">• Workers hired by smallholders who are a vulnerable group that needs adequate protection



b) Core and Continuous Improvement Approach

Topic	Summary of Feedback	Outcome	Further Explanation
<p><i>Simplification of Improvement approach</i></p>	<ul style="list-style-type: none"> • The purposed system of three types of improvements (mandatory, context-specific, or self-selected) was too complicated. • Ambiguity on how the context-specific topics would be selected for certificate holders. • Lack of clarity of the distinction between certificate holders work if they work on different improvements 	<ul style="list-style-type: none"> • Only two types of improvements are included in the second draft: Mandatory and Self Selected. • Mandatory topics moved to self-selected if they are proved to be low risk in the sector/region. • Fewer topics are selected for self-selected in the revised standard 	<ul style="list-style-type: none"> • Based on a risk assessment, topics can be moved from mandatory to self-selected depending if they are high or low risk
<p><i>How the improvement approach affects the certification process</i></p>	<ul style="list-style-type: none"> • There was unclarity on how the improvement levels affect the certification decision. 	<ul style="list-style-type: none"> • There are two types of improvement requirements: <ul style="list-style-type: none"> <u>A. Improvement levels:</u> Predefined levels of improvement, with predefined timelines, to reach next level. Audits verify these levels with a pass or fail criteria <u>B. "Smart meter":</u> Predefined indicators by the Rainforest Alliance, but no targets; Producers define their own targets/timelines for improvement, Audits validate the quality of data in case these are published. The data measured does not influence the certification decision. 	<ul style="list-style-type: none"> • The introduction of smart meter criteria provides the opportunity to collect better data on improvements



c) Outcomes of the Standard

Topic	Summary of Feedback	Outcome	Further Explanation
Climate	<ul style="list-style-type: none"> Climate adaptation and mitigation need to be strengthened further in the standard 	<ul style="list-style-type: none"> Climate-smart agricultural practices revised throughout the standard in areas group management, risk assessment, good agronomic practices and natural resource conservation, safe use of agrochemicals, biodiversity conservation. A new topic area has been added in the environment chapter, and that is CO₂. 	<ul style="list-style-type: none"> Important to ensure farmers resilience and adaptive capacity to the challenges of climate Supply chain actors are quantifying their GHG emissions (CO₂-eq) and indicators for the energy source as well as energy and CO₂ reduction in their supply chain

d) Performance Focus

Topic	Summary of Feedback	Outcome	Further Explanation
Data Collection	<ul style="list-style-type: none"> The purposes of the data collection and use of data unclear 	<ul style="list-style-type: none"> The future standard has a more precise explanation of the role of data 	<ul style="list-style-type: none"> Data privacy concerns are of essential to supply chain actors and certificate holders
Costs of Data Collection	<ul style="list-style-type: none"> Concerns about the increased costs due to data collection 	Improved clarity on the costs, and emphasis on the reduction of costs	



2) PRICE AND PREMIUM

Topic	Summary of Feedback	Outcome	Further Explanation
<p>Premium mechanism</p>	<ul style="list-style-type: none"> • A mechanism should be placed to enable producers to cover the costs of sustainable production • the Fixed amount for premium is less supported 	<ul style="list-style-type: none"> • The notion of mandatory premium in all sectors. • The Rainforest Alliance will explore in the four main sectors (cocoa, coffee, tea, and bananas). A sector approach to further guidance on addressing the adequacy of premium and how in each sector this is implemented. 	<ul style="list-style-type: none"> • Stakeholders felt it was a shared responsibility of the supply chain and an integral part of sustainable production
<p>Transparency of Premium</p>	<ul style="list-style-type: none"> • Transparency on the usage of the premium and amount investment needs to more explicit and aligned • Respondents wanted to ensure a % to reach the farmers • A decision-making process for the expenditure should be in place 	<ul style="list-style-type: none"> • Changes made to the smallholder standard include; transparency by the group management on the price and premium received, with a percentage being a cash payment. An improvement level is that there needs to be group decision making in the expenditure. New: Smart Meter on % of premium transferred in cash to group members • Medium-large farms standard includes the premium expenditure must benefit all workers. 	



3) FEEDBACK ON STANDARD CHAPTERS

a) Management Chapter

Topic	Summary of Feedback	Outcome	Further Explanation
Capacity Assessment Tool	<ul style="list-style-type: none"> • Respondents wanted to review capacity Assessment Tool described in the standard 	<ul style="list-style-type: none"> • Capacity assessment tool for analysis for the second consultation period 	
Profitability	<ul style="list-style-type: none"> • Concerns on the suitability of the profitability criteria, the scope of and feasibility of its implementation as the support would be required • Not a relevant topic for medium and large estates. • Pure record keeping does not necessarily lead to increased profits 	<ul style="list-style-type: none"> • Second draft standard only included this area only for smallholders. • Scope of the audit clarified: Audit should focus if the management utilizing the relevant information such as yields/production, volume, production costs to make the choices. • Developed the improvement criteria to focus on skills and resources to adequately provide the farms such as financial literacy, management training 	<ul style="list-style-type: none"> • The skills and resources that could enable to higher profitability should be encouraged.
Gender	<ul style="list-style-type: none"> • A pure quota is unrealistic 	<ul style="list-style-type: none"> • Standard will ask for a self-assessment and plan for improvements which is non-quoted 	<ul style="list-style-type: none"> • To give Certificate Holders more ownership of the outcomes of gender assessment



b) Farming Practices Chapter

Topic	Summary of Feedback	Outcome	Further Explanation
<p>Sustainable Yields</p>	<ul style="list-style-type: none"> • Notion of 'optimal yields' was perceived as 'maximum yields', which caused confusion 	<ul style="list-style-type: none"> • Need for clear definition in the standard and supporting documentation. • Topic changed to recording of actual yields, as part of the Management Chapter (1.8) • Criteria regarding optional yields removed as is covered in areas such as risk assessment and profitability 	<ul style="list-style-type: none"> • To keep in line with the terminology used elsewhere • optimal yields very place-specific parameters make it difficult to work with and audit
<p>Sustainable Production Practices</p>	<p>The following feedback to the agricultural practices</p> <ul style="list-style-type: none"> • <u>Pruning</u>: requests for specific guidelines • <u>Renovation and rejuvenation</u>: realistic and context-specific criteria are asked for. • <u>Planting density and rotation</u>: Criteria needed on annual crops • <u>Diversification</u>: Concept agreed with the concept but how it was written was arbitrary • Feasibility of these practices can be difficult as input, knowledge, finance are required. 	<ul style="list-style-type: none"> • Further crop specification in the standard. The Rainforest Alliance refers to existing local guidance and will if needed develop guidance materials • Renovation/rejuvenation is taken up as a separate, self-selected topic with smart meter indicator • Diversification is encouraged in the management chapter 	<ul style="list-style-type: none"> • to avoid the standard becoming too extensive by crop-specific areas • To be explored how support to producers can be incentivized and encouraged through Chain of Custody in the feasibility of these practices



<p>Soil fertility and conservation</p>	<ul style="list-style-type: none"> • Yearly soil testing is too expensive. • Some criteria need to be either more specific or need more guidance: fertilizer principle of appropriate source, rate, time and place; advanced soil conservation measures; additional measures to improve soil fertility; / • Some topics were missing or not well reflected: drainage, soil erosion in slopes, soil health, nutrient cycling. 	<ul style="list-style-type: none"> • Soil testing will be once in 3 years, while still yearly for annual crops • Use of context-specific guidelines • Criteria have been reformulated to integrate missing topics • The content on crop coverage has been made stricter after the pesticide expert meeting, to enhance the decrease in pesticide use. 	
<p>IPM</p>	<ul style="list-style-type: none"> • The IPM criteria need to be restructured, • Some criteria are redundant and subjective. • Some criteria need to be reformulated as auditability is difficult (example: chemicals as a last choice). 	<ul style="list-style-type: none"> • Criteria have been restructured and reformulated. • New Smart meter: "Producers reduce the use of pesticides and abandon the use of pesticides from the risk mitigation list." 	
<p>Agrochemicals management</p>	<ul style="list-style-type: none"> • Many detailed requirements for adaptations of the criteria • Text is considered long 	<p>The criteria have been grouped according to the activity with the agrochemicals. Differences small/large: some criteria are included as improvement for smallholders New improvement for smallholders to use centralized, specialized spraying teams</p>	
<p>Harvest and post-harvest practices</p>	<ul style="list-style-type: none"> • In general, a supportive reaction towards including harvest and post-harvest handling criteria, but more details needed. 	<ul style="list-style-type: none"> • Rewritten with greater detail and clarity • From self-selected improvement to mandatory improvement 	



c) Social Chapter

Topic	Summary of Feedback	Outcome	Further Explanation
<p>Assess & Address</p>	<ul style="list-style-type: none"> • Approach generally supported • Some feared approach is too weak, as it may be perceived as permitting human rights violations 	<ul style="list-style-type: none"> • Stronger wording in our statement to ensure it is communicated in the Rainforest Alliance Standard does not tolerate human rights violation • More guidance and binding annexes. These cover areas such as the assurance approach which includes preventative measures in stage 1 of the certification cycle and clear sanctioning including suspension and de-certification if the violation occurs. • The binding remediation protocol is provided to ensure steps to safeguard the safety to the victim as well as thoroughly addressing the issue. 	<ul style="list-style-type: none"> • This model goes beyond a narrow prohibition approach in its ability to drive truly long-lasting change. Rainforest Alliance experience and human rights experts support the argument that this is the most effective approach.
<p>Freedom of Association</p>	<ul style="list-style-type: none"> • Define separately, in different sub-criteria, the various aspects that constitute the right to Freedom of association • Widen the criteria to respond to the concerns of incorrect interpretation because of lack of definitions and description of instances of interference 	<ul style="list-style-type: none"> • The former improvement criteria will be incorporated into the core criteria 	<ul style="list-style-type: none"> • Core criteria contains all necessary elements to ensure freedom of association



<p>Wages and contract</p>	<ul style="list-style-type: none"> • Written contracts in agricultural production are rarely found • Limit the in-kind benefits • Workers hired by smallholders are not addressed in the standard 	<ul style="list-style-type: none"> • Definition includes written and verbal contracts • In-kind benefits limited to 30% of total remuneration • Provisions for workers hired by smallholders 	
<p>Living wage</p>	<ul style="list-style-type: none"> • There was opposing feedback. Some respondents wanted the gaps to be closed faster in order to pay a living wage. Alternatively, others argued that there is too much burden to pay living wage on the producers, especially in case of low product prices. • Contextualise living wage improvement criteria, as some countries have their own or different benchmarks • Assessment can show where prices are insufficient 	<ul style="list-style-type: none"> • A living wage is actively encouraged, but there is no penalisation for producers unable to reach the living wage threshold within a certain time. • A smart meter added. A payment towards living wage must be measured but cannot be imposed to producers if price paid is too low. • Include other benchmarks 	<ul style="list-style-type: none"> • Living wage in the standard including a priority benchmark Global living Wage coalition (GLWC) to standardise assessment in most countries. In case of absence of the GLWC benchmark, other/local benchmarks are allowed



<p>Working conditions</p>	<ul style="list-style-type: none"> • Two opposing views. Part of the feedback agreed with ILO Industry Convention 1919 Hours of Work no.1, 30, which the standard followed. • Alternatively, stakeholders disagreed as it does not allow for exceptions in peak production in specific sectors. 	<ul style="list-style-type: none"> • Limited flexibility for overtime during “exceptional circumstances” such as peak production periods or changing weather conditions: <ul style="list-style-type: none"> - The maximum period of 12 weeks per calendar year - Maximum 24 hours of overtime a week - Maximum 14 consecutive days of work <p>Inspired by the ILO Code of Practice on safety and health in agriculture, 2010, art. 19.2</p> <ul style="list-style-type: none"> • Topic raised in the second public consultation for further discussion. The limited flexibility is planned to be phased out within six years. 	<ul style="list-style-type: none"> • In some sectors, there is a shortage of labor during peak harvest season. • Agricultural sector is incomparable with other industries in terms harvest needs • During peak harvest workers want to work more overtime to increase their income and cover the period without work • Not in all countries there are (acceptable) overtime policies
<p>Maternity rights</p>	<ul style="list-style-type: none"> • Paid maternity (ILO C183) needs to be included 	<ul style="list-style-type: none"> • 14 weeks maternity leave is now included in the standard for M/L 	<ul style="list-style-type: none"> • New Standard is in line with ILO conventions



<p>Health and Safety</p>	<ul style="list-style-type: none"> • Need of increased clarity on aspects of health and safety such as drinking water • OHS plan was not included, but installment of an OHS committee. Respondents felt this made the system incomplete 	<ul style="list-style-type: none"> • More descriptive approach was chosen with all specific requirements. • Question in second public consultation about the need of an OHS plan and OHS Committee 	
<p>Housing and living conditions</p>	<ul style="list-style-type: none"> • Criteria were a mix of various requirements applicable for dormitory type of accommodation as well as individual quarters provided to workers • Improvement levels were perceived as unrealistic to be globally applicable (due to cultural differences) • Terminology perceived as too technical • Advocacy for applicable to smallholders hiring temporary workers, where housing is provided • Important to cover safety of vulnerable groups 	<ul style="list-style-type: none"> • Criteria have been redesigned to <ul style="list-style-type: none"> - fit different contexts and leave space for local interpretation of the best kind of housing - cover the minimum safety, health, hygiene and decency requirements in the core requirements - Have a logical build-up of improvements in respectively direct living conditions and comfort 	<ul style="list-style-type: none"> • Important to improve minimum safety, health, hygiene, and decency requirements as well as a better fit to local contexts of housing
<p>Communities</p>	<ul style="list-style-type: none"> • Criteria on land rights should also apply to smallholder groups 	<ul style="list-style-type: none"> • The smallholder standard includes "right to use the land is not legitimately disputed by groups of current or former local residents or communities." For M/L one mandatory improvement, and one self-selected improvement included. 	<ul style="list-style-type: none"> • Not feasible to apply the full-fledged FPIC-criteria to smallholders



d) Environment Chapter

Topic	Summary of Feedback	Outcome	Further Explanation
<p>Deforestation cut-off date</p>	<ul style="list-style-type: none"> • Opposing feedback regarding 2008 cut-off date for deforestation. Some find it correct, others find it too strict. • 2008 date is more stringent than almost all company commitments and other organizations 	<ul style="list-style-type: none"> • Cut-off date is changed to 2014 	<ul style="list-style-type: none"> • Simplicity & consistency in having a single cutoff date -allows more new producers to join the program without allowing more deforestation • Continuity in the program as it same cutoff date as 2017 Rainforest Alliance agriculture standard • Borden eligibility rules allow greater participation in our program • Forest cover data for 2014+ is generally available and more accessible to monitor
<p>Assessment of natural ecosystems</p>	<ul style="list-style-type: none"> • Standard needs to mention High Conservation Value areas (HCV) 	<ul style="list-style-type: none"> • No additional actions are needed for smallholder operations • For M/L we require an inventory of HCVs and appropriate management actions to protect these. • > 10.000 Has or with >1000 ha of natural ecosystems an HCV assessment by a licensed assessor will be required. 	<ul style="list-style-type: none"> • The risk level will have to be assessed by the farms through a simple risk assessment on, for example, overlap with protected areas, key biodiversity areas, intact forest landscapes etc. These risk assessment questions will likely form part of the broader risk assessment that will be required to comply with 1.3.5.



Agroforestry – Set aside area	<ul style="list-style-type: none"> • the criteria were not clear if it is applicable for which crop, compliant with Agroforestry 	<ul style="list-style-type: none"> • The improvement level is now a smart indicator with more explicit indicators and set aside areas 	
Riparian buffer and chemical non-application zones	<ul style="list-style-type: none"> • More guidance needed on non-application zone parameters and Riparian Buffers 	<ul style="list-style-type: none"> • Riparian buffers are moved to the core with an increase of % of Riparian Buffers 	
Wildlife protection	<ul style="list-style-type: none"> • No exceptions to hunting should be in the standard. • Standard needs to refer to National regulations. 	<ul style="list-style-type: none"> • Criteria now prohibits wildlife hunting. 	
Wastewater treatment	<ul style="list-style-type: none"> • Monthly tests for Smallholders would be challenging to complete • Should focus on increased re-use of waste water 	<ul style="list-style-type: none"> • No longer indicating the number/frequency of test rather than has to be conducted during peak harvests • Focus in the standard on the increase the re-use of treated wastewater 	
Waste management	<ul style="list-style-type: none"> • Waste recording would have no additional value for certificate holders • Greater need for segregation of waste • Considerations needed in the standard what to do if there are no waste disposal facilities 	<ul style="list-style-type: none"> • No record keeping (kg of waste) • Waste segregation in place • Improvement on processing organic matter and/or organic fertilizer and application to the fields. 	



<p>Water conservation</p>	<ul style="list-style-type: none"> • New irrigation systems should be core rather than self-selected • Focus on water use efficiency 	<ul style="list-style-type: none"> • New irrigation systems is a core requirement • Water use efficiency in the improvement topics 	
<p>Energy</p>	<ul style="list-style-type: none"> • Add indicator for energy source used, e.g. renewable or non-renewable. • The standard should support CO2 reduction in the supply chain. • Energy reduction is not an accurate indicator of sustainability, therefore focus on energy use efficiency • Energy section is probably infeasible for Smallholders 	<ul style="list-style-type: none"> • Standard revised so that Farm sets targets for increasing energy efficiency and for reducing dependency on non-renewable energy sources. • New GHG emission criteria. • Both these topics only have self-selected improvement requirements, no core criteria. 	<ul style="list-style-type: none"> • Many supply chain actors are already quantifying GHG emissions (CO2-eq). • European Union working on carbon Footprint of commodities