

SYNOPSIS OF STAKEHOLDER FEEDBACK

The second round of the Public Consultation Feedback

June 2019- August 2019





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1. SET UP OF THE STANDARD

Topic	Summary of Feedback	Outcome and Further Explanation
Distinction Smallholders between Medium/Large farmers	<p>A: Issues arose in the definition presented of the smallholders. Much feedback stated that there are regional differences in what defines a smallholder (such as hiring workers, size of land), which would incorrectly include or exclude farms.</p> <p>B: Feedback also highlighted a lack of definition or characteristics of a medium farm, which provided confusion.</p>	<p>A: The former Pre-merger Rainforest Alliance description of a smallholder is being adopted in the new standard. Being a global standard, it is important to de-link a definition of a smallholder based solely on farm size. Also, the standard now states that if hired labor over a certain threshold is used, then specific social Requirement. This is to protect these vulnerable workers who were previously not considered in the standard without burdening smallholders who hire workers.</p> <p>B: The term medium farm has been removed from the standard as it does not add any additional clarity.</p>
Improvement Level Timeframes	<p>A: Feedback stated that 9 years was a too-long timeframe overall to implement changes</p> <p>B: Mixed feedback on the timeframe for the improvements being too ambitious or relaxed</p>	<p>A: The improvement levels have been changed to fit levels 1 and 2 to meet in 3 and 6 years.</p> <p>B: There is greater flexibility in the timeframe as producers only need to meet a percentage of the improvement level</p>
Smart Meter	<p>A: Certificate Holders can set there own smart meter targets. However, respondents' feedback was that Certificate Holders would set low targets.</p> <p>B: Respondents were confused with what is a smart meter and improvement level and the difference between them.</p> <p>C: As this was a novel concept, feedback stated that the rainforest alliance should commence with a limited number and then scale up once more testing has started.</p>	<p>A: It was decided to still keep to this approach, as the belief is that this approach empowers the producers as it provides more ownership of their improvements, and ultimately generate more reliable data. Over time, there will be gathering data on what targets are is feasible, which could be used as reference targets.</p> <p>B: In the final standard, Smart Meter and Improvement Levels will have an improved and also visuals for clarity.</p> <p>C: Decision to start just as it is, management smart meters do not require sophisticated measurement.</p>



Self Selected improvements	A: There was mixed feedback on this type of improvement. Feedback stated that there are no incentives for producers to follow self-selected improvements. On the other hand, though feedback and via the feasibility assessment, producers indicated which self-selected improvements they would be working on, or wanting to publish on their member profiles.	A: Self-selected improvements will remain as proposed. Incentives will be that supply chain actors want to support producers on their specific improvements to have the ability claims on this. Another incentive is that the producers themselves can publish these improvements or data measured on their public profile.
Indicators	A: Indicators regarding social areas or behavioral change are difficult to implement without sophisticated data gathering.	A: The indicators are being revised to be more objective, including the gender topic.



2.KEY TOPIC AREAS

Topic	Summary of Feedback	Any outcome and Further Explanation
<p>Service Providers</p>	<p>A: Overall feedback was in favor of including requirements for service providers. However, questions were raised on the feasibility, the effect on the cost of certification, and issues auditing such as availability of documents.</p> <p>B: Comments raised on unclarity of what should be classified as a service provider, what requirements would apply to those parties, and if it is service providers just connected to the certified crops, or service providers of a particular size.</p> <p>C: Questions also arose about the willingness of service providers to coordinate, cost of auditing the service provider, and training.</p>	<p>B: The standard has now specified which service providers to whom the Requirement applies and what type of monitoring is needed, such as signed agreement, internal audit. Additionally, where service providers pose a specific risk, the Requirement are more explicit. For example, the risk of forced labor issues is addressed through requirements of labor providers, agrochemical use though spraying teams without protection. Additional glossary terms were also created to clarify between service providers and sub-contractors.</p> <p>C: The requirements were re-written to be more precise and have reasonable expectations of the Certificate Holder in monitoring their service providers.</p>
<p>Premium questions</p>	<p>A: Respondents accepted the Premium and did not foresee any administrative problems, but does not assist for low market prices This topic generated broad, high-level feedback. Please find it summarized below</p> <ul style="list-style-type: none"> - The main concerns from respondents were the operationalization of the Premium requirements, thus requested more clarity and transparent procedures and guidance on this area. - Transparency is a second strong request from the respondents. In the consultation, this concept and how it would be operationalized in the standard varied. The most common feedback of the idea of transparency is what, when, and how much Premium is received. In contrast, others wanted 	<p>A: Advocating for market prices is completed though the broader actions of Rainforest Alliance in its advocacy work and cannot be taken up in the Rainforest Alliance Standard.</p>



	<p>transparency throughout the supply chain, as well as visibility on the impact of the Premium. Some respondents were the use of mobile banking to ensure that it is traceable back to producers.</p> <ul style="list-style-type: none"> - While there were expectations, there was overall, and there is support to the idea of having a mandatory premium. Feedback varied if this mandatory Premium should be a fixed amount. - There was several responses that requested higher premium levels based on stronger performance levels 	
<p>Countries without a minimum wage</p>	<p>A: Respondents felt that reinforcing the link between the standard, national legislation, international agreements, and wages of high importance. Feedback was concerned about how to set up the minimum wages when there is no official minimum wage for the agricultural sector.</p> <p>B: There was concern expressed is that working with minimum wages might lead to a status quo on a low level of wages being acceptable, especially in countries where the minimum wage is far below a living wage.</p> <p>C: Feedback stated that while working with national poverty lines is acceptable as a starting point, especially the World Bank poverty lines, but it would need additional input from experts or by national consultations.</p>	<p>A: While there were valid feedback, it has not been taken up due to issues in operationalizing the</p>
<p>Climate change feedback</p>	<p>A: Feedback stated that more clarity is needed on Climate-Smart Agriculture.</p> <p>B: Climate change risks need to be included in the risk assessment.</p>	<p>A: Rainforest Alliance to develop more material on Climate-Smart Agriculture</p> <p>B: Climate change considerations to be included in the risk assessment</p>



<p>Agrochemicals</p>	<p>A: Feedback was mixed, and this subject area received strong responses</p> <p>B: A large amount of feedback from the Colombian coffee sector with similar responses in favor of a risk approach rather than a prohibition approach.</p> <p>C: Feedback responses contained examples of specific agrochemicals were requested not to be prohibited they were needed their production of certified and non-certified crops</p> <p>D: A phased out approach to be met by 2024 was felt as unrealistic by stakeholders as citing that there are no creditable alternatives. The other two suggestions of Hazard based (focusing on the application) and overall toxic load got more positive feedback from the respondents.</p> <p>E: Feedback also highlighted that the policy on areal fumigation is outdated, as it does not consider recent changes in the use of drones and GPS.</p>	<p>As this subject is controversial, with stakeholders holding strong conflicting opinions on the matter, it was decided to create a channel of development, which included expert panel and a smaller working group to consider all the feedback and in line with the Rainforest alliance vision along with pragmatic considerations</p>
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CHAPTER 1: MANAGEMENT

Topic	Summary of Feedback	Outcome and Further Explanation
<p>1.1 Management Capacities</p>	<p>A: Positive feedback on the capacity management tool</p> <p>B: Some feedback requested an <i>N/A</i> option in the capacity management tool, especially for groups of large producers and trader-led producer groups to have regular meetings.</p> <p>C: There were concerns about the sharing of financial information with auditors.</p> <p>D: There was comments tool will take much time to fill out and add to the costs for the group</p> <p>E: The topic areas mentioned in the Requirement did not match the topics in the sheets of the tool</p>	<p>B: It was decided not to use <i>N/A</i> as an option, and level 1 (adequate) would be minimal level. This is because it is seen as the first step in a well-functioning IMS system. The ideal IMS has formal documentation and structure in place to implement policies and processes. Policies and procedures are developed based on stakeholder consultation and planning. Post-implementation, activities are checked, evaluated, and monitored to ensure that learning and improvement take place. Therefore, it is essential to document regular meetings.</p> <p>C: In the guidelines and training materials, it will be communicated that it is essential that the management show that financial information exists and is used, which will be confirmed by the auditor, but not review the content of the documentation.</p> <p>D: The pilots concluded that the time needed was limited (2-4 hours) and that there are no additional costs involved. Further guidance will be made to assist the group management in using the tool.</p> <p>E: The tool was corrected so that the subjects aligned with the standard</p>



<p>1.2 Group member Administration</p>	<p>A: <u>Requirement 1.2.1</u>: Feedback included removing ID, date of birth, phone size, and household size as it is difficult to obtain, and with household no clear universal definition. Yields should be specified for a certified crop, and no differentiation between workers and change the <i>first year of certification to the year first certified</i>.</p> <p>B: <u>Requirement 1.2.2</u>: Feedback is to include the type of work for workers' register, specify wages paid, for workers living on-site, including the location of the house and number of family members. For young workers, school registration should include the name of school attending and class level,</p> <p>C: <u>Requirement 1.2.3</u>: Workers' records should be for all farms and delete statements that illiterate group members can give information orally.</p> <p>D: <u>Requirement 1.2.4</u>: For maps, more clarity was needed on the time scale and how regular these needed to be updated. More clarity asked regarding the terms <i>human settlements, the proximity of farm limits, 'other existing native vegetation cover,</i></p> <p>E: <u>Requirement 1.2.5</u>: There was feedback regarding the value of this Requirement as smallholders typically do not have the knowledge or resources to map their farms, and sketches at the group management level are not used.</p>	<p>A+B: The modifications as per the feedback were made, and a template registry will be provided to assist the Group Member administration/Management</p> <p>C: The provision for illiterate group members was kept</p> <p>D: Requirement changed accordingly as well as the definitions.</p> <p>E: The Requirement was changed to a (hand-drawn) sketch for smallholders, but it was decided to remain. The reason is that it is a good part of the management to get to know their farm and risks on the arm and also useful for producers themselves to start to administer their own land.</p>
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<p>1.3 Internal Inspections and Risk Assessments</p>	<p>A: <u>Requirement 1.3.1</u>: Mixed feedback regarding the yearly inspection of all farms, and it often was confused with respondents with the role of the IMS. Also, the rotation system seemed burdensome on the group management as it is not based on risk and also inspecting non-certified crop farm units.</p> <p>B: <u>Requirement 1.3.2</u>: Mixed feedback from responses on the 1:250 ratio of internal inspectors and farms. Also, the feedback stated that the focus should be focused on competency rather than passing an exam</p> <p>C: <u>Requirement 1.3.5</u>: Respondents often thought this as a gap analysis, which was not the objective of the Requirement. A risk assessment should be conducted on all Requirement</p>	<p>A: The Requirement was rephased to provide clarity</p> <p>B: Farms have been clarified as farm units to avoid miscommunication. The ratio was decided to stay.</p> <p>C: The Requirement has been rephased so that it more apparent it is a risk assessment that is required in all areas.</p>
<p>1.4 Management Plan and Service Delivery</p>	<p>A: Feedback from respondents indicated unclarity on the management tools when they should be used and with whom.</p> <p>B: Feedback stated that it was unclear on what content the management plan should include. In addition, Respondents suggested Rainforest Alliance should provide a template for a management plan to assist. On the other hand, feedback from the feasibility assessment stated that would be a lot of work without any value for farms to change their existing plans into a new format for the Rainforest Alliance certification process,</p> <p>C: In regards to recruitment providers, the feedback was to prohibit worker payment of recruitment fees as" the employer pays" principle is regarded as best practice.</p>	<p>A: There is more clarity has been throughout the standard when each management tool does not overlap and when a management tool should make the reference of another.</p> <p>B: The Management Plan will have a template that can be optionally used.</p> <p>C: An additional Requirement have been developed outside of service providers with specific distinction on recruiter pays.</p>



<p>1.5 Grievance Mechanism</p>	<ul style="list-style-type: none">A. Definitions of grievance and grievance mechanism are to be more in line with the United Nations Guiding Principles on Business and Human Rights principles 29 and 31B. Guidance is needed on how to develop adequate grievance mechanismsC. The mechanism does not need to be "formal" and should feedback highlighted that other more informal was should able submitted and recorded, with verbal possibilitiesD. More significant connections gender committee and assess-and-address committee/personE. A clear description of follow up actions once a grievance is submittedF. Language and approach was not fully aligned with the Assess-and-address systemG. The grievance mechanism lacks protection against retaliation, and also a concern for those submitting grievances outside the workforceH. The Rainforest Alliance needs to develop its grievance mechanism as a standard-setting organization	<ul style="list-style-type: none">A: Following definitions were added or revised: grievance, grievance mechanism, confidentiality, and retaliation.B: Grievance mechanism was refining scope and Requirement in the following ways: people need to receive a response, need to know how a complaint will be dealt with, follow up needs to be specifiedC. Requirement rephased to encourage alternatives ways of submitting a grievanceD. The grievance mechanism has been more connected in the standard in gender, assess-and-address and also communitiesE: The connection of follow up actions have been interlinked with the remediation protocolF: Requirement rephrased to be more aligned with the assess-and-address systemG: Greater considerations in the standard for retaliation against whistleblowers and other grievance submittersH. The Rainforest Alliance has formulated its grievance mechanism
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<p>1.6 Gender Equality</p>	<p>A: Important to clarify what we want to achieve with gender equality and how that could look like in practice. From the feedback, it becomes clear that improve Requirement is not easily understood. Through this formulation, it becomes more clear what we are aiming for and how it could be measured. From the feedback, it becomes clear that many pp (including CBs) think gender equality is about parity in numbers, not about equal opportunities and rights. More awareness-raising is needed</p> <p>B Important to adjust the gender assessment tool and make its indicators coincide with the indicators of the smart meter and some indicators of the standard (like # female farmers with improvement plans)</p> <p>C: Important to clarify links with management, grievance mechanism, and assess and address. A specific gender grievance mechanism was suggested</p>	<p>A: Requirement adjusted to have more awareness-raising of gender equality</p> <p>B: More preferable indicators have been modified</p> <p>C: The gender requirement has a greater connection to links to the management, grievance mechanism, and assess-and-address chapter.</p>
<p>1.7 Young Farmers</p>	<p>A. This (new) topic was accepted due to the importance of bringing young persons into the farming sector.</p> <p>B. There were concerns about implementation as groups have little influence on voluntary membership in groups. Young persons need to be persuaded to see that farming is an economically viable income.</p> <p>C. There were concerns that this topic could be used as a loophole to bring children/young persons into child labor/ hazardous work.</p>	<p>C: The standard included greater clarification on what is meant by a young farmer by the emphasis on the age brackets in the standard, inclusion in the glossary and changing the child labor, child work definitions.</p> <p>D: Management is requested to map out and identifies appropriate ways to include young farmers (age 18-35) in farming activities. This includes suggestions of adding but not limited to group membership, access to farmlands, provision of planting materials and other inputs, training, service provision, employment, and decision making.</p>



	<p>D. Feedback was that management to map out young farmers, and appropriate ways to include them in activities before the inclusion of young farmers.</p>	
<p>1.8 Traceability</p>	<p>A. Some unclarity concerning terms such as <i>annually</i>, <i>credible</i></p> <p>B. Contradictory feedback on delay for submitting sales transactions of three months – some wanted more or less.</p> <p>C. Confusion on what is a credible methodology for yield estimation.</p> <p>D. A representative sample is too vague, and members and auditors will play around it. Feedback stated that traceability was not aligned to the relative of the cut flower industry</p>	<p>A: Terms and clarification re-written for better understanding as well as new definitions.</p> <p>B: There is a guideline for a credible methodology for yield estimation</p> <p>C: We have to be specific with a % of the farms that should be sampled.</p> <p>C: Where the necessary distinction has been made for cut-flowers, which also includes the assurance and</p>



1.9 Premium

A: Feedback raised issues on the timing of the delivery vs. the selling (of the product). The distribution method of the premium and payment methods, as well as a broader question on premium purpose and levels.

B: Terms and clauses which were unclear to respondents were *responsible overhead; paid within a year in case of continuous harvest, in-kind benefit.*

C: Requirement 1.9.3 and 1.9.4: The feedback stated that there was confusion between these two requirements, especially between terms *co-decide* and *consulted*. Besides, feedback questions the logic on how the Premium can be spent on sustainability investments by the group management in case the group members co-decide on a different (non-sustainable) priority.

D: Requirement 1.9.6: Feedback asked to form more clarification on what investments/Premium would benefit the workers, and how to assure this

E: Concerns were raised concern on the administration distribution of Premium within farmer groups

C: Further definition of the terms will be applied

D: Requirements were merged into one Requirement and using the word consulted

D: Requirement now specifies examples of how the workers can benefit from the Premium, such as Living Wage, health and safety improvements, housing, and living conditions.

E: The distribution of Premium has been rephrased to have better transparency.



CHAPTER 2: FARMING CHAPTER

<p>2.1 Planting and rotation</p>	<p>A: <u>Requirement 2.1.1</u>: The term <i>certified planting material</i> not understood by respondents and created confusion. Also, feedback wanted to keep records of the variety and the name of the provider for all new plantings. Also, add <i>preferably</i> resistant to diseases as it is not always possible to find such variations.</p> <p>B: <u>Requirement 2.1.2</u>: Confusion when this is applicable, also what is meant by intercropping and diversification.</p> <p>C: <u>Requirement 2.1.3</u>: Feedback stated that crop rotation would be difficult for smallholders that have less arable land. Also, feedback from the flower sector indicated that it is not possible to intercrop in their industry—contradictory feedback from within the pineapple sector about the feasibility of a rotation system.</p>	<p>A: Requirement reformulated to avoid confusion with the term <i>certified planting material</i> removed, and it specifies that this is to be done to new plantings and <i>preferably</i> was added.</p> <p>B: Requirement reformulated.</p> <p>C: This Requirement has been moved to an improvement level</p>
<p>2.2 Pruning and renovation of crop trees</p>	<p>A: <u>Requirement 2.2.1</u>: The feedback stated there was confusion regarding the pruning cycle referred to and what the Requirement expected from producers. Feedback also concept of "annual pruning" and align pruning with the production cycle</p>	<p>B: This criterion was moved to a smart meter requirement for better understanding and to reflect the fact that it is an improvement</p>



2.3 Genetically Modified Organisms (GMOs)	<p>A: Feedback was for both stricter and more lenient approach to GMO. However, the majority wants the standard to have a more stringent approach towards GMOs.</p> <p>B: Feedback also asked some extra clarification as to why we have those Requirement.</p>	<p>B: A position paper on the rainforest Alliance approach to GMOs.</p>
2.4 Soil fertility and Conservation	<p>A: Term soil assessment was not understood by the respondents and was generalized as chemical aspects. This was also prevalent in the Spanish feedback translation, where the term 'soil' was translated <i>análisis de Tierra</i> instead of <i>análisis de Suelo</i>.</p> <p>B: There was feedback that soil assessment should be done on a sample of farmers rather than all involved farms.</p>	<p>A: the Requirement goes beyond chemical aspects and to physiography. Requirement re-written, and careful consideration of future translation.</p> <p>B: The stipulation was made that the soil assessment can be done on a sample of farms.</p>



**2.5 Integrated
Pest
Management
(IPM)**

A: Requirement 2.5.1: Smallholders should not ask to develop the IPM Strategy. The Group Management is responsible for the development, and SHs are accountable for the implementation; the criterion should reflect that. Include being developed by a professional. And include guidance

B: Requirement 2.5.2: Smallholders will have difficulties in complying with this as the core, so feedback asked for this to be simplified. A suggestion that weed mapping is needed to define actions

C: Requirement 2.5.3: There feedback on these Requirement highlighting its subjective nature, thus making it difficult to audit and the difficulties in complying from year one of the standards. Also, references to national institutions and competent professionals needed to be made. Also, there was mixed feedback about the role of preventive feedback or calendar spraying.

D: Requirement 2.5.4: Feedback requested to change *pesticide* to the *active ingredient*

E: Requirement 2.5.5: Feedback stated that the Requirement is unclear and was too subjective. Also, it was highlighted that some beneficial plants to crops also host pests,

F: Requirement 2.5.6: Reduction of pesticide use is not always possible, and the correct dosage is also linked to effectiveness.

A: Applicability of the Requirement has been changed. The text has been modified accordingly as well as an IPM guidance document. Also, conditions have been developed to assist small farms in as they are not able to create an IPM strategy.

C: Wording has been improved, and references to competent professionals and institutions have been added. Also, calendar spraying has been included when recommended by a competent professional.

D: The Requirement has now been rephrased as per the feedback.

E: Requirement was reformulated to be clearer

F: This Requirement was modified to monitor the application and rationalize/optimize the pesticide use, as reduction is not always possible, so the key is optimized use.



<p>2.6 Agrochemicals Management</p>	<p>A: Feedback stated that the following Requirement said it was ambiguous, too subjective, or too few details or too many elements in one requirement: 2.6.3, 2.6.4, 2.6.5, 2.6.6, 2.6.7 and 2.6.8, 2.6.9</p> <p>B: <u>Requirement 2.6.1</u>: Feedback suggested that only products that are legally registered for the specific crop in the production country can be used</p> <p>C: Feedback stated that the bathing requirements needed to be evaluated</p> <p>D: <u>Requirement 2.6.11</u>: add additional safety requirements for spillage</p>	<p>A: The requirements were rephrased, reduced, modified into new Requirement.</p> <p>B: This requirement was rephrased to focus solely on training, with MSDS sheets and conditions moved elsewhere.</p> <p>C: Bathing after application of agrochemicals was given its requirement, with special considerations to the resources of smallholders.</p> <p>D: Additional safety requirement of accidental spillage (Emergency spill kit, Material Safety Data Sheets, Emergency Shower area)</p>
<p>2.7 Harvest and Post Harvest Practices</p>	<p>A: Feedback focused on the unclarity in the requirements of what was required</p> <p>B: A request for crop-specific requirements to be included in post-harvest practices to guarantee a bit more quality and food safety.</p>	<p>A: Wording changed for better understanding in this topic</p> <p>B: A general practice related to hygiene and cleanliness of harvest and post-harvest techniques; however, it was decided to keep this requirement general and go into more detail in the crop guidance.</p>



CHAPTER 3: SOCIAL CHAPTER

<p>3.1 Assess and Address Discrimination, Forced Labor, Child Labor, Workplace Harassment and Violence</p>	<ul style="list-style-type: none"> A. The overall positive response towards the assess and address approach. However, feedback also wanted to include a strong statement against human rights violations B. Criticism was that more details were needed on <i>the responsible person/committee</i> within the assess and address system. There was lacking direction on who is appointed as person/committee, how to ensure the person/committee is qualified. etc C. More details were also needed on the remediation process, such as clarify how the requirement complies in case of criminal offenses where local authorities need to be involved, vulnerable groups, cooperation NGOs, continuous improvement), strengthen links to international frameworks. D. Feedback also stated that more specification of timelines of awareness-raising and monitoring was needed E. Specify links with grievance mechanisms (1.5) and gender committee (1.6.). 	<p>A: Standard will include a strong statement stating that all forms of human rights abuses will not be tolerated on Rainforest alliance farms and approach requires certificate holders to have specific measures in place to monitor, mitigate and remediate any cases found.</p> <p>B: The standard includes more details about who the responsible person/committee should be and that they raise awareness</p> <p>C: A detailed remediation protocol has been further developed as a binding annex. More inclusion of vulnerable groups now covered in the standard and the glossary</p> <p>E: There are now links with the Grievance mechanism and gender committee. Also, the Remediation Protocol as a tool in any situation where the Grievance Mechanism receives a worker/labor rights grievance.</p>
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<p>3.2 Freedom of Association and Collective Bargaining</p>	<p>A: Concern that where unionization is restricted, it might bring management in a difficult position if they facilitate forms of the association on their farm(s)</p> <p>C: Emphasis on unions is a concern to some as it might give the impression that other worker representation forms are valued less (specifically sensitive in Costa Rica and Ecuador).</p> <p>B: Concern that this chapter might bring too much work to farms with a limited number of workers / individual smallholder farmers. Should there be a minimum threshold for instance</p> <p>C: ILO convention more explicit especially around what social dialogue means</p>	<p>A: The Freedom of Association criterion in the standard provides that workers must have the right to join or form a union/workers' organization, and where these are prohibited by law, "management does not hinder the development of parallel means for independent and free association, bargaining and dialogue with management." However, farms are not required to have a union/workers' organization.</p> <p>There is much rephrasing in the topic to avoid some misconceptions</p> <p>B: Indications on how to deal with national legislation needs to be improved to avoid confusion on how to interpret the requirements and to prevent problems for management in countries where worker representation is not stimulated by government.</p> <p>C: awareness-raising activities should be given to increase understanding of what the requirement entails / could be implemented.</p> <p>D: these requirements and the concern needs to be addressed + clarification given why unions are mentioned so explicitly</p> <p>In the guidance document, additional explanation/justification needs to be given why unions are mentioned so explicitly (above other types of worker representation). Maybe also in external communication.</p>
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<p>3.3 Wages and Contracts</p>	<p>A: There was a high level of feedback opposing verbal contracts.</p> <p>B: <u>Requirement 3.3.2</u>: Feedback stated it was unclear what this requirement tried to achieve</p> <p>C: <u>Requirement 3.3.3</u>: Mixed feedback regarding adding <i>national</i> before the minimum wage. Other feedback stated that local/regional minimum wage should apply, whereas the national minimum wage should be an improvement criterion.</p> <p>D: <u>Requirement 3.4.4</u>: There were mixed feedback wage deductions. When it is legal, like disciplinary actions or decisions for work-related items, some feedback asked for it to be acceptable for deducting costs of tools/protective gear, other times, it suggested it due to theft of items.</p> <p>E: Feedback arose of the definition of permanent workers and which groups would include (sub-contractors, collection center)</p> <p>F: Feedback stated that for smallholders, the requirements were not feasible with their abilities.</p> <p>G <u>Requirement 3.3.5</u>: Feedback asked is labor contractors could be used. Further feedback was that the costs of labor providers should be within these Requirement</p> <p>H: Feedback on worker definition also question what workers do they include: IMS staff, group workers, subcontracted workers, workers of processing facilities</p>	<p>A: This has been decided to remain as it is not feasible to have only written contracts. Written records are expected to be kept of this verbal communication.</p> <p>B: The former <u>requirement 3.3.2</u> have been integrated into <u>Requirements 3.3.1 and 3.3.5</u></p> <p>C: The requirement will remain the same at <i>minimum wage</i> with no stipulation of national or regional as it is the auditor's knowledge of what will be the prevailing wage.</p> <p>B: Requirement reformed to highlight each different circumstance to provide greater clarity that deductions are only able by prevailing law.</p> <p>The definition includes types of workers to avoid ambiguity</p> <p>it is not feasible to adjust wages for inflation</p> <p>G: Labour providers will be kept as the term, as often it is informal, and by calling it labor contractor, it falls into the scop of contractors. The requirement of employee pays recruitment fees added here.</p>
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<p>3.4 Living Wage</p>	<p>A: Positive Feedback praises the approach for being realistic about the ability of producers to meet the Living wage Requirement gradually, for the transparency with through the use of the salary matrix and member profiles.</p> <p>B: Negative criticism was that this approach was too unambitious, and weak where producers have to pay the target living wage within a specified timeframe.</p> <p>C: The feedback tended to focus on how the system of certification and the living wage approach would provide the profitability of farmers to pay a living wage. Additional feedback, explicitly requesting Requirement for the buyers (supply chain) and/or mandatory Premium.</p> <p>D: The criticism states that only encouraging Living Wage Requirement instead of having a clearly defined method to guarantee wage increases does not accredit the standard and its effectiveness. This is especially when there is a great deal of public/media attention over the living wage.</p> <p>E: Feedback also stated that this should be included for workers of smallholder farmers</p> <p>I: Feedback highlighted national living wage benchmark should be included in the standard</p>	<p>C+D: This concern of additional Premium will be reflected in the Supply chain standard and the broader work of the Rainforest Alliance.</p> <p>E: It was decided to keep as a criterion for medium to large farms, as smallholders need first to provide themselves a living income.</p> <p>G: The living wage requirement now includes the living wage benchmark in the standard</p>
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<p>3.5 Working Conditions</p>	<p>A: <u>Requirement 3.5.1</u>: Feedback was given that the current requirement could be misinterpreted as continuous shifts without breaks for sleep.</p> <p>B: <u>Requirement 3.5.2</u>: There was disagreement with this proposal for overtime to be phased out is unattainable to reach in 6 years as peak seasons, climate conditions, and workforce shortages will continue to occur. Respondents stated that there needs to be flexibility in the agriculture sector. Also, overtime hours are linked to local regulations with some national contexts that do not require overtime to be made in request, and often these requests are caused due to unexpected and unforeseen events. Also, feedback asked that small producers are also required to comply with these hours.</p> <p>C: <u>Requirement 3.5.3</u>: Additional request to define what a breastfeeding room for nursing workers should be</p>	<p>A: This criterion has been rephased to stipulate that a standard 8 hour day is a regular workday.</p> <p>B: Overtime work now stipulates that it must be <i>requested in a timely manner</i>. The Requirement further highlight that the health of the worker should always be considered, so that they are impacting the health of the worker (though accidents), by monitoring potential incents, and stress the importance of adequate pay and sufficient breaks.</p> <p>C: Additional clarification of what a nursing room should comprise of.</p>
<p>3.6 Health & Safety</p>	<p>A: Respondents were asked if they preferred a pre-merger UTZ approach of having detailed Requirement, or a pre-merger Rainforest Alliance approach where a health and safety risk assessment and plan. Those in favor of the pre-merger UTZ approach stated that this approach was more feasible, less complicated, less costly simpler to comply with, and an auditor can enforce consistency as there is (less prone to interpretation). On the other hand, a pre-merger Rainforest Alliance approach would focus on risks identified by experts, cover a broader section of possibilities more effective attacking the risks.</p>	<p>A: From the feedback, it was decided to have a Risk assessment approach for medium-large farms and prescribed Requirement for smallholders, with some necessary and requirements to set a standard across the board, for the best interest of the worker in varying contexts. A combination of both is better to ensure nothing is left out.</p> <p>B: Certain Health and safety requirements are now applicable to workers who hire more than 5 workers annually.</p> <p>C: The specifics of the number of sanitary services have been adopted from the Former RA, which includes the maximum persons for facilities. Also, for farms and facilities with fewer than 10 workers, facilities do not need to be separated by gender.</p> <p>D: The requirement now stipulates that workers should receive a copy of their test results (not just informed).</p>



	<p>B: Respondents highlighted that Health and safety Requirement should also apply to smallholders who hire workers who are a vulnerable group.</p> <p>C: Respondents want to quantify sanitary services, and also have separate toilets in larger groups.</p> <p>D <u>Requirement 3.6.10</u>: Suggestions suggested that stating <i>workers having access to results</i> as in practice works never receive their documentation.</p> <p>E: Feedback stated that the health and safety requirements were lacking for fire drills, evaluation maps, and building safety.</p> <p>F: Respondents wanted greater clarity on terms such as <i>Hazardous situation</i> and <i>Imminent danger situation</i></p>	<p>E: Additional requirements to include fire drills, evaluation maps, and building safety.</p> <p>F: Additional terms such as hazardous situations and immediate danger to be added to the definition.</p>
<p>3.7 Housing and Living Conditions</p>	<p>A: <u>Requirements 3.7.1</u>: The feedback was that it wanted more specific, quantifiable numbers and measures and reduce subjective terms such as <i>acceptable housing, walking distance, or reasonable traveling distance</i>.</p> <p>B: The improvements to housing not seen as feasible within the established deadlines</p> <p>C: Make sure that standard does not give incentives to avoid providing housing to escape the requirements</p>	<p>A: Overall, an illustrated guide will be provided that explains and clarifies acceptable housing while allowing regional and cultural context.</p> <p>B: Improvement levels and what was required adjusted to be in the line of what is feasible</p> <p>C: The Housing and living conditions section provides a requirement for offsite housing for temporary workers.</p>



<p>3.8 Communities</p>	<p>A: The feedback that the communities did sufficiently relate to the ven to the FPIC process. It is necessary to include in the indicator text or through a specific tool the guidelines for certified and certifying undertakings when deemed necessary the need for an FPIC process</p> <p>B: Feedback stated that <u>Requirement 3.8.3 and 3.8.4</u> should both mandatory, not voluntary for medium-large farmers</p> <p>C: Feedback requested more clarity on the terms <i>legitimately disputed</i> and <i>cultural and religious interests</i></p> <p>D: Indigenous peoples are not referred to in the standard, and they are a group that is often most affected by land disputes/issues. The concrete proposal is to include some specific points to protect this group</p>	<p>A: Binding annex was developed to outline the FPIC process and considerations for certificate holders, as well as more significant considerations in the standard.</p> <p>B: This has remained an improvement criterion as it is a difficult criterion to meet. The grievance mechanism deals with immediate complaints from local communities, and this criterion works towards a more extended plan.</p> <p>C: Terms added in the definitions</p> <p>D: Specific reference to indigenous people made in the standard and a definition added.</p>
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CHAPTER 4: ENVIRONMENTAL CHAPTER

4.1 Forests, Other Natural Ecosystems and Protected Area	<p>A: Many stakeholders strongly advocating an earlier date for deforestation that 2014 arguing a reputational risk.</p> <p>B: There was confusion regarding the term <i>natural ecosystems</i>, which is some respondents found confusing, especially when referring to the previous pre-merger standard.</p> <p>C: Feedback also stated that there needs to be a mechanism to allow for exceptions, for example, fallow land left due to armed conflict, deforested land that is now being restored</p>	<p>A: The Rainforest Alliance decided to keep this cut-off date, with better communication is needed for the reasons for this decision, which are Simplicity & consistency, continuity, Strong market positioning, Inclusivity, and Monitorability.</p> <p>B: Rephrasing definitions to provide clarity on the new terminology of the system</p> <p>C: Additional guidance for situations which may</p>
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<p>4.2 Conservation and Enhancement Of Natural Ecosystems and Native Vegetation</p>	<p>A: Feedback related to the difficulties of reaching the required amount of native vegetation cover. Also, feedback foresee difficulties on how to assess the percentage of native vegetative cover accurately</p> <p>B: Responses stated a definition of a <i>large native tree</i> was required</p> <p>C: Requirement 4.2.3 was misunderstood</p> <p>C: Feedback raised on how to consider restoration efforts</p> <p>D: Confussion about the agroforest Requirement, as there are serval examples when a <i>shade torrent crop</i> would not apply</p>	<p>B: Definition was added of large native tree added</p>
<p>4.3 Riparian Buffer and Chemical Non-Application Zones</p>	<p>A: Feedback was more clarity is needed between aquatic ecosystems the difference between riparian buffers and chemical non-application zones, as well as vegetative barriers and chemical non-application zones</p> <p>B: Feedback also stated drift control measures was absence from the standard</p>	<p>A: Requirements were reordered and reworded. The pesticide non-application zone requirements were moved to the agrochemical topic to provide better clarity on this topic. The definitions were reformulated of the following terms to improve understanding: Riparian zones, non-application zones, vegetative barriers, restoring</p> <p>B: Drift control measures requirement added in the agrochemical use in the farming chapter.</p>



<p>4.4 Protection of wildlife and biodiversity</p>	<p>A: Positive feedback on the topic and requirement</p> <p>B: Requirement 4.4.1 Comments stated that hunting should be allowed if there are national regulations and cultural parts of communities. Feedback also highlighted that threatened animals are never hunted, even if causing problems to crops.</p> <p>C: <u>Requirement 4.4.2</u>: The requirement of the welfare of animals should be included in domestic/farm animals</p> <p>D: <u>Requirement 4.4.4</u>: Feedback noted that the prohibition use of animals more general than coffee,</p> <p>E: Feedback that temporary workers still should get an introduction to the general aspects of human-wildlife conflicts</p> <p>F: Improve the definitions of wildlife and related terms</p>	<p>B: Requirement on hunting now stipulates that Animals that are endangered or protected are never hunted or killed" to allow local laws and cultural hunting in certain circumstances</p> <p>C: Welfare of farm animals also included in the requirement</p> <p>D: Requirement updated to use for animals and held captive for commercial purposes.</p> <p>E: As temporary workers are part of the definition of workers, in general, this was not included</p> <p>F: The following terms have been updated: Wildlife, Pest wildlife, Vertebrates Threatened species, Hunting</p>
<p>4.5 Water Conservation</p>	<p>A: <u>Requirement 4.5.1</u>: Feedback differculties in asking for water extraction permits from certificate holders as these formal concessions cannot be mandatory.</p> <p>B: <u>Requirement 4.5.2</u>: Feedback that when new irrigation systems are established, water from one watershed is not diverted to another.</p> <p>C: <u>Requirement 4.5.5</u>: Feedback request that water harvesting references rainwater for non-consumptive activities</p>	<p>A: Requirement in topics updated to be more precise on what is expected on sustainable water extraction (and in cases of the absence of a legal framework), while not comprising general water security</p> <p>B: Requirement rephrased to include not diverting watershed from one to another</p> <p>C: Requirement was rephased to included additional clarification on rainwater is to be used</p>



<p>4.6 Wastewater management</p>	<p>A: <u>Requirement 4.6.1</u>: Feedback was that there must be explicit reference to country legislation regarding water parameters such as <i>BOD</i>, <i>COD</i>. In the absence of this, certificate holders should comply with Rainforest Alliance parameters.</p> <p>B: <u>Requirement 4.6.2</u> Not clear what is our objective with this.</p> <p>C: <u>Requirement 4.6.1</u>: Make Requirement applicable for all crops, or specific Requirement per crop or type of processing (e.g., fresh fruit vs. mills).</p>	<p>A: This feedback has been incorporated stating it should meet national legislation, lack of this National Legislation, then Rainforest Alliance Parameters applies. For smallholders, a system is in place to reduce containment, but tests are not required.</p>
<p>4.7 Waste Management</p>	<p>A: <u>Requirement 4.7.4</u>: Feedback was that work should be improved</p> <p>B: Request of explicit mentioning of the procedure when storage facilities are full</p>	<p>A: Requirements in the waste management topic have rephased to provide additional clarity with additional definitions of Hazardous materials, sewage, waste, and designated area.</p> <p>B: Specific consideration is now given in the standard of returning obsolete agrochemicals.</p>
<p>4.8 Energy Efficiency</p>	<p>A: Positive response from the consultation to this topic. Suggestions for improvement, including examples of energy efficiency.</p> <p>B: Respondents asked if this could be converted into a mandatory requirement rather than self-selected. This was because of the sizeable volume of GHG that are emitted through agricultural activities; energy efficiency needs to be necessary at last for medium and large farms.</p>	<p>A: Guidance document will be provided to assist certificate holders on energy efficiency measures and existing tools and approaches that can be used.</p> <p>B: It is now a mandatory requirement for management to quantify and documents the type of energy sources used.</p>



4.9 Greenhouse Gases Reduction	A: Feedback was supportive of the inclusion of Greenhouse gas reduction. However, feedback felt the requirement was vague and needed more detail and support in the form of guidelines and training.	A: The requirement has been rephrased to be more precise and includes with additional definitions of <i>carbon footprint (CO2 footprint)</i> , <i>Greenhouse gases (GHGs)</i> . Rainforest Alliance will provide materials including a methodology, list with recommended methods/tools, best practices. Guidances will be provided on data collection as well as training on how to carry out a CO2 footprint assessment.
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ANNEXES

<p>Annex 1: Glossary</p>	<p>A: Child labor definition needed to be revised to align with international law</p> <p>B: Remediation needed to be revise</p>	
<p>Annex 2: Capacity Assessment Tool</p>	<p>A: Introduction was not clear</p>	<p>A: Add additional guidance on how to use the tool</p>
<p>Annex 3: Gender Equality & Annex 4: Gender Assessment Tool</p>	<p>A: Language of the document needs to be more accessible to different literary levels</p> <p>B: Questions too subjective</p> <p>C: Include transgender in the definition</p>	<p>A: Guidance to be written in a more accessible language</p> <p>B: Questions are more concrete and understandable by relating to procedures, structures, and policies in place rather than questions on perceptions</p> <p>C: Definition of gender to also include transgender</p>
<p>Annex 6: Assess & Address Approach Annex 7: Risk Assessment and Mitigation Tool Annex 8: Remediation Protocol</p>	<p>A: More guidance needed for Certificate holders and auditors regarding the system</p> <p>B: A whistleblower policy should be included</p> <p>C: The standard lacks clarity on what family labor is opposed to child labor or child work</p>	<p>A: Develop a self-explanatory responsibility chart for contacting the authorities; who makes that decision, based on what checklist</p> <p>B: More detailed consideration on whistleblowers</p> <p>C: Definition updated on the standard</p>



Annex 9 &: Methodology for Measuring Remuneration and Gaps with a Living Wage & Annex 10: Salary Matrix for a Living Wage Gap Analysis	A: The matrix is complicated and complex—also additional questions about how they can be supported and examples of how it can be used. B: The methodology which explains is clear and understandable	A: These considerations will be considered as well as further testing of the matrix
Annex 11: Guidance on non-deforestation approach	A: More clarity on the term "minor destruction." B: The guidance does not cover groups where deforestation occurs before certification	A: Term to be clarified in the guidance B: Guidance to be created regarding changes