1. Introduction

The ProTerra Foundation’s mission is to be a global network of organizations and businesses supporting more sustainable agricultural practices, in the food and feed supply chains, where relevant the conversion to non-GMOs and full respect of workers and communities’ dignity. We envisage a world where all stakeholders contribute to the protection of biodiversity by switching to sustainable production, conserve natural resources and ensures that local communities are treated with dignity and respect.

We recognize that in many parts of the world there is a significant gap between the reality and sustainable agricultural practices and food/feed production, where in other parts the practices can exceed the general benchmark. Therefore, regional interpretations may be necessary to help businesses engage and ultimately implement over time a sustainable approach to their activities or to help stakeholders gain confidence in the practices associated to products coming from regions with a diverse reality than theirs.

ProTerra Foundation has issued its Europe Interpretation version of the ProTerra Standard aiming at supporting the improvement over time of the agricultural activity in and to help stakeholders gain confidence in products incoming their local markets.

ProTerra has four core aims, that have driven the development of this EUROPEAN¹ Interpretation of ProTerra:

- Foster good agricultural practices;
- Secure the supply of sustainably produced, traceable, non-GMO ingredients for feed and food;
- Protect the environment, and
- Promote that workers and communities be treated with dignity and respect.

¹ Europe in the context of Proterra is understood as the European continent therefore including all countries in this geographical location.
2. Implementation Approach

As mentioned, this regional interpretation aims at adjusting ProTerra requirements to the European commodity market and to the operational reality of producers in the diverse countries that are part of Europe.

The approach adopted by ProTerra is based on a risk evaluation of the different European countries. The risk is based on both the potential presence of GMO in a crop and in the potential of negative environmental and social aspects of agricultural activity in a given European country.

Based on the specific result, a set of ProTerra principles, criteria and indicators are selected and against these producers and / or farms will be assessed. Ultimately where there is a reduced level of risk the scrutiny will be also reduced.

2.1 Qualitative Risk Approach

GMO risk

ProTerra European Interpretation GMO risk approach is based on the countries where the crop is coming from. This takes in account the approval or not of plating material within the different European Country, risk of contamination of fields (crosspollination or contamination by wind transport for example). ProTerra takes in consideration the risk criteria established in the Richtlinie zur Definition der “Gentechnikfreien Produktion” von Lebensmitteln und deren Kennzeichnung (Guideline on the Definition of “GMO-Free Production” of Food and its Labelling) published in the Austrian Codex Alimentarius, IV edition (published with decree reference BMGFJ-75210/0014-IV/B/7/2007 from 6 December 2007, as amended on 9 September 2010).

Farms are therefore assigned a production area risk level based on their geographical location (risk of origin)\(^2\) and associated GM risk. Classification is as follows\(^2\):

- **No Risk (NR)** EU countries: national bans on the cultivation of all GM crops approved for cultivation in the EU, non-EU countries: no GM varieties approved for cultivation:

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\(^2\) Albania (ALB), Austria (AUT), Belarus (BLR), Belgium (BEL), Bosnia and Herzegovina (BIH), Bulgaria (BGR), Croatia (HRV), Cyprus (CYP), Czech Republic (CZE), Denmark (DNK), Estonia (EST), Finland (FIN), France (FRA), Germany (DEU), Greece (GRC), Hungary (HUN), Iceland (ISL), Ireland (IRL), Italy (ITA), Kazakhstan (KAZ) (European part), Latvia (LVA), Lithuania (LTU), Luxembourg (LUX), North Macedonia (MKD), Malta (MLT), Republic of Moldova (MDA), Montenegro (MNE), Netherlands (NLD), Norway (NOR), Poland (POL), Portugal (PRT), Romania (ROU), Russian Federation (RUS) (Nenetsia, Komi-Permyak, Sverdlovsk, Chelyabinsk, Orenburg), Serbia (SRB), Slovakia (SVK), Slovenia (SVN), Spain (ESP), Sweden (SWE), Switzerland (CHE), Turkey (TUR) (European part), Ukraine (UKR), United Kingdom of Great Britain and Northern Ireland (GBR).
AUT, BEL, BIH, CHE, CYP, DEU, DNK, EST, FIN, FRA, GBR, GRC, HRV, HUN, IRL, ITA, LTU, LUX, LVA, MLT, NLD, NOR, POL, SRB, SVN, SWE;

• **Low Risk (LR):** risk is related to geographical origin: RUS (Nenetsia, Komi-Permyak, Sverdlovsk, Chelyabinsk, Orengburg), TUR (European part);

• **Medium Risk (MR):** risk of GM contamination with other crops; concerns countries where the cultivation of GM crops is not prohibited and contamination of the target crop may therefore occur: BGR, CZE, ESP, PRT, ROU, SVK;

• **High Risk (HR):** risk of contamination with GM crop as these are cultivated in this country or were cultivated there up until two years ago, or because the situation is unclear: BLR, MDA, UKR.

*Environmental and social risks:*

ProTerra European Interpretation applies the risk approach defined in *amfori BSCI’s Country Risk Classification* most recent publication. The risk classification of countries relies on the ProTerra European Interpretation applies the risk approach defined in amfori BSCI’s Country Risk Classification most recent publication. The risk classification of countries relies on the Worldwide Governance Indicators (6 dimensions of governance identified by the World Bank). These determine the level of risks related to governance in sourcing countries. Countries are classified as either **risk countries** or **low-risk countries**.

For details, results please refer to [COUNTRY RISK Classification](#).

3. **Applicable ProTerra requirements under the European interpretation**

All current and valid ProTerra documents are fully to be considered as part of the European Interpretation except were specifically referred to in this document.

In this way, the valid version of the ProTerra Standard with all its principles, criteria, indicators and definition apply. In a similar way, are applicable the ProTerra Certification Protocol, the Guidelines and Requirements for the Use of the ProTerra Logos and Seals and any other valid documents that are part of the ProTerra certification scheme.

Considering the results of the risk evaluation, the following ProTerra Standard requirements are applicable (empty cells indicate that no indicator is applicable):
Table 2 - GMO risk and applicable ProTerra Standard requirements

<table>
<thead>
<tr>
<th>Principle</th>
<th>No Risk</th>
<th>Low Risk</th>
<th>Medium Risk</th>
<th>High Risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Principle 5 – No use of Genetically Modified Organisms (GMO)</td>
<td>5.1.3</td>
<td>5.1.2</td>
<td>All indicators apply</td>
<td>All indicators apply</td>
</tr>
<tr>
<td>Principle 9 – Adoption of good agricultural practices</td>
<td></td>
<td></td>
<td>All indicators under 9.5</td>
<td>Management of propagation material</td>
</tr>
<tr>
<td>Principle 10 – Traceability and Chain of Custody</td>
<td>All indicators apply</td>
<td>All indicators apply</td>
<td>All indicators apply</td>
<td>All indicators apply</td>
</tr>
</tbody>
</table>

Table 3 - Environmental and social risks and applicable ProTerra Standard requirements

<table>
<thead>
<tr>
<th>Low risk Countries</th>
<th>Risk Countries</th>
</tr>
</thead>
<tbody>
<tr>
<td>PRINCIPLE 1: Compliance with law, international conventions and the ProTerra Standard (all indicators)</td>
<td>PRINCIPLE 1: Compliance with law, international conventions and the ProTerra Standard (all indicators)</td>
</tr>
<tr>
<td>PRINCIPLE 3: Responsible relations with workers and community (all indicators)</td>
<td>PRINCIPLE 2: Human Rights and responsible labour policies and practices (all indicators)</td>
</tr>
<tr>
<td>Criteria 9.4 Documentation of agricultural production</td>
<td>PRINCIPLE 3: Responsible relations with workers and community (all indicators)</td>
</tr>
<tr>
<td>Criteria 9.6 Reduction of toxic and polluting materials</td>
<td>PRINCIPLE 4: Biodiversity conservation, effective environmental management and environmental services (all indicators)</td>
</tr>
<tr>
<td></td>
<td>PRINCIPLE 6: Pollution and waste management (all indicators)</td>
</tr>
<tr>
<td></td>
<td>PRINCIPLE 7: Water management (all indicators)</td>
</tr>
<tr>
<td></td>
<td>PRINCIPLE 8: Greenhouse gases and energy management (all indicators)</td>
</tr>
<tr>
<td></td>
<td>PRINCIPLE 9: Adoption of good agricultural practices (all indicators)</td>
</tr>
</tbody>
</table>
For the audit the CB shall apply the set of Principles, criteria and indicators that apply to both the GMO Risk (Table 2) and Environmental and social risks (Table 3).

4. Sampling Plan and Sample size

The sampling of farms (sample size definition) will be as per the requirements described below.

Table 4 – Sampling requirements based on GMO risk

<table>
<thead>
<tr>
<th>Risk level</th>
<th>Sampling requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Risk</td>
<td>Square root of the number of farms divided by 2</td>
</tr>
<tr>
<td>Low Risk</td>
<td>Square root of the number of farms</td>
</tr>
<tr>
<td>Medium Risk</td>
<td>Square root of the number of farms + 30%</td>
</tr>
<tr>
<td>High Risk</td>
<td>Square root of the number of farms + 40%</td>
</tr>
</tbody>
</table>

Table 5 – Sampling requirements based on environmental and social risk

<table>
<thead>
<tr>
<th>Environmental and social Risk level</th>
<th>Additional requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low risk Counties</td>
<td>Square root of the number of farms</td>
</tr>
<tr>
<td>Risk Countries</td>
<td>Square root of the number of farms + 40%</td>
</tr>
</tbody>
</table>

The final sample size will be the value derived of the highest value that resulted from the comparison of the sample size based on GMO risk and the sample size for the environmental and social risk.

Numbers are always to be rounded upwards.

5. Stakeholder communication

The certification or communication related to the certification must clearly indicate the reference to ProTerra European Interpretation, the associated country of origin and the level risks considered. This will ensure a transparent communication with stakeholders.
6. Benchmarking against other standards

ProTerra has rules for benchmarking against other sustainability criteria. The objective of benchmarking is understandings the level of alignment between standards and defining recognition agreement where possible. ProTerra embraces mutual recognition and synergies wherever applicable. These synergies aim towards the reduction of costs and complexity on all levels, reduce audit burden and encourages cooperation.

ProTerra benchmarking criteria and the current recognized Standards are detailed at the ProTerra Foundation webpage.