



ProTerra Standard

for Smallholders

Social Responsibility and Environmental Sustainability



Interpretation for India
Version 1.0 | August 2019



The ProTerra Standard for Smallholders - India Interpretation

1. Introduction

The ProTerra Foundation's mission is to be a global network of 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 businesses 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, therefore regional interpretations may be necessary to help businesses engage and ultimately implement over time a sustainable approach to their activities. The concept of continuous improvement is an essential aspect of any regional interpretation. In the ideal scenario organizations would, in the long run, reach a full alignment with the ProTerra Standard (understood as the full version of the document).

ProTerra Foundation has issued its India Interpretation version of the ProTerra Standard aiming at supporting the improvement over time of the agricultural activity in India, especially amongst smallholders (family farms). Additionally ProTerra Foundations understand that any effort in implementing sustainable agricultural practices would also contribute to smallholder livelihood and life quality in many aspects.

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

- Foster good agricultural practices to increase yield and quality of products;
- 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.

For the sake of this standard a smallholder in India is considered to be any agricultural property owned by an individual or a group of individuals (not a company) with less than 2 hectares.

1.1 Implementation Approach

As mentioned, this regional interpretation aims at adjusting ProTerra requirements to the Indian market and operational reality of smallholders in order to support the gradual alignment of Indian agricultural commodities with the ProTerra core aims.

To reach such intention a stepwise approach was been used in **ProTerra India Smallholder Interpretation**:

- A set of ProTerra requirements are to be met in the initial certification (**entry level of ProTerra India Smallholder Interpretation**);
- An additional set of requirements must be met by the beginning of the third year of certification (intermediate level of **ProTerra India Smallholder Interpretation**), and
- All requirements to be met by the end of the fifth year of certification (advanced level of the **ProTerra India Smallholder Interpretation**).

Participants may at the end of the initial certification reach intermediate or advanced level should they meet all the necessary requirements.

For terms and definitions, GMO risk in crops and listing of forbidden pesticide please refer to ProTerra Standard version 4.0.

The current valid version of the Proterra Certification Protocol, available at the ProTerra Foundation web page, applies to this **ProTerra India Smallholder Interpretation** with exception of:

- Item 6.5 (Non-conformities and Corrective action) is not applicable to **ProTerra India Smallholder Interpretation**.
- Item 6.6 (Certification) is not applicable.
 - To achieve certification against **ProTerra India Smallholder Interpretation** the farmers must demonstrate compliance with all the requirements of a given certification level. If there are non-conformities, the certificate will not be issued until objective evidence has been received and verified by the Certification Body that these are corrected. This verification may include additional on-site audit. The economic operator shall answer the non-conformity report with the corrective actions to be taken, and send it to the Certification Body within a maximum of 3 months. The implementation of the corrective actions for non-conformities will be verified at the next annual audit. The Certification Body shall not issue a certificate of compliance or re-issue a certificate until non-conformity is closed out to the satisfaction of the Certification Body. The validity of certification is 1 year for Level II and Level III organizations and of 2 years for Level I.

- Appendix 1 – Certification Body Application
- Appendix 3 – Sampling Methodology

Attachment A, brings the Farm sampling methodology applicable to the

ProTerra India Smallholder Interpretation.

As this interpretation is reduced in relation to ProTerra Standard, any certification or communication related to the certification of a smallholder must clearly indicate the reference to ProTerra India Smallholder Interpretation and the associated level (entry, intermediate or advanced). This will ensure a transparent communication with the stakeholders.

2.0 Principles, Criteria, Indicators and Guidance for smallholders in India

PRINCIPLE 1: Compliance with law

1.1 Comply with all applicable national and local laws and

1.1.1 Smallholders shall demonstrate clear title to land or to its use in accordance with national practice and law (at initial certification – entry level).

1.1.2 Smallholders shall demonstrate understanding and complying with relevant applicable national and local regulations (the beginning of the third year – intermediate level).

1.1.3 Smallholders shall demonstrate continuous improvement regarding compliance with the requirement of the ProTerra Standard India Interpretation (beginning of the fifth year and thereafter – advanced level).

PRINCIPLE 2: Human Rights and responsible labour policies and practices

2.1 Absence of slave and forced labour, child labour, and coercive disciplinary or control methods.

2.1.1 Smallholders shall not use slave labour, forced labour, indentured servants, and their equivalents (at initial certification – entry level).

2.1.2 Child labour, except in contexts permitted within national law shall not be used in certified organisations (at initial certification – entry level)

2.1.3 Coercive disciplinary or control methods shall not be permitted. This includes corporal or mental coercion, confinement, threats of violence or other forms of physical, sexual, psychological, or verbal abuse/harassment (at initial certification – entry level).

Guidance: Although smallholders rely mainly on family members, they may hire rural workers for specific tasks or support. These workers are to be treated with respect and dignity and under no circumstance be victims of human rights abuses.

Refer to ILO Convention 138 definition including light work and special protection for young workers. In family agriculture, the child can be allowed to work provided that it is not abusive or dangerous, and does not interfere with the health, education and school attendance of the child.

Where young workers and children are present on a farm, the producer shall be able to demonstrate knowledge on child work-related issues.

2.2 Weekly working hours and overtime

2.2.1 Smallholders shall take necessary measures to guarantee decent working hours for workers engaged to work at their farms, according to the local and national laws (at initial certification – entry level).

2.2.2 In all cases, workers are entitled to at least one day off following 6 consecutive days of work, unless collective bargaining has defined a different frequency (at initial certification – entry level).

2.2.3 Overtime shall be voluntary, exceptional and be compensated at a premium rate (at the beginning of the fifth year of certification – advanced level).

Guidance: The work time limits are flexible in that it is recognised that there may exist certain unavoidable periods during the year, during which employees will be expected to work substantially longer hours for a restricted period of time. The extraordinary time pressure of harvest time is an example of such a situation. Typically, as decent is understood as not routinely exceed 48 hours per week and not routinely exceed 12 hours per week of overtime (therefore 48 to 60 hours/week).

2.3 Equal opportunities and treatment for workers

2.3.1 All workers and applicants shall have equal employment opportunities, and equal treatment on the job. No discrimination shall be tolerated including: “any distinction, exclusion or preference made on the basis of race, colour, age, gender, sexual orientation, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation. Any distinction, exclusion or preference in respect of a particular job based on the inherent requirements thereof shall not be deemed to be discrimination.” (Ref: ILO Convention 111, Articles 1 and 2) (at initial certification – entry level).

Guidance: There shall be no differences in the working conditions of any workers due to employment status (e.g., permanent, temporary or subcontracted workers). However, “equal opportunities” and/or “equal treatment” shall not necessarily prevent certain workers from receiving rewards based on merit or performance, such as pay bonuses, paid vacation time, or other enhancements that are above and beyond the entry compensation due to all workers in the operation.

2.4 Workers’ working and living conditions

2.4.1 All workers living on site shall have appropriate, fairly priced, and safe food, water and housing, should these be provided by the certified organization (at initial certification – entry level).

Guidance: “Appropriate” includes at least the following: shelter from the elements; exclusion of pests; ready access to facilities for maintaining hygiene; ready access to water, facilities for food preparation and eating; clean sleeping and sitting quarters (including some type of bed), and open space where workers would be able to move around freely during non-working hours.

2.5 Decent salary and income

2.5.1 All workers, regardless of age or gender, shall be paid a fair, locally representative wage or salary, which shall meet or exceed the Legal Minimum Wage established for the region, including ant piece work (at initial certification – entry level).

2.5.2 The smallholder does not practice any illegal deduction from wages or for disciplinary or similar purposes (at initial certification – entry level).

2.5.3 Payment shall be regularly paid in the national currency, documented and recorded (at the beginning of the third years of certification – intermediate level).

2.6 Safety and health of workers protected

2.6.1 Workers and family members shall be trained in health and safety on the job, and particularly those workers or family members handling pesticides and other toxic substances, or hazardous equipment shall be trained to store, apply, and dispose of pesticides and other toxic substances and to operate hazardous equipment safely, as specified in the manufacturer’s instructions and legal requirements. Usage and maintenance of personal protective equipment PPE are to be included in the training provided (at initial certification – entry level).

2.6.2 Hazardous tasks, including the application or handling of pesticides such as insecticides, fungicides, and herbicides, for pests, diseases and non-crop plants, shall be conducted only by workers or members of the family who are qualified and properly trained (at the beginning of the third years of certification – intermediate level).

2.6.3 Smallholders shall provide workers and family members all necessary personal protective equipment (PPE), clothing and working tools relevant for the task and these should be used (at the beginning of the third years of certification – intermediate level).

2.6.4 First aid shall be readily and quickly available if and when accidents or other emergencies occur on the work site (at the beginning of the third years of certification – intermediate level).

PRINCIPLE 3: Responsible relations with workers and community

3.1 Land use does not impair the rights of traditional other users

3.1.1 Land use in all cases shall not interfere with the agricultural production systems of neighbours and other traditional users (at initial certification – entry level).

PRINCIPLE 4: Biodiversity conservation, effective environmental management and environmental services

4.1 Land use conversion and forest conservation

4.1.1 Smallholders shall ensure that land use conversion to agricultural area is aligned with the governmental regulations (at initial certification – entry level).

4.2 Maintenance and enrichment of biodiversity

4.2.1 Smallholders shall understand the importance of biodiversity and be knowledgeable on conservation strategies (at initial certification – entry level).

4.2.2 Smallholders shall maintain valuable biodiversity within their areas (at the beginning of the third years of certification – intermediate level).

4.2.3 Smallholders shall restore areas of natural vegetation around bodies of water and on steep slopes and hills, and other sensitive parts of the ecosystem (at the beginning of the third years of certification – intermediate level).

PRINCIPLE 5: No use of Genetically Modified Organisms (GMO) management and environmental services

5.1 GMOs are excluded

5.1.1 Genetically modified organisms (GMO) and their by-products must not be used in the production of ProTerra certified products (at initial certification – entry level).

5.1.2 Smallholders shall avoid contamination¹ of certified products by GMO's from external sources (at initial certification – entry level).

5.2 System of Identity Preservation and segregation

5.2.1 Smallholders must not mix production or storage of non-GMO with GMO materials.

PRINCIPLE 6: Pollution and waste management

6.1 Appropriate management of hazardous and non-hazardous wastes and pollutant materials

6.1.1 Smallholders shall segregate, adequately handle, store and dispose hazardous and non-hazardous waste properly. Waste management shall at least comply with national laws (at initial certification – entry level).

6.1.2 Smallholders shall handle, store and dispose of pollutant materials properly. Management of pollutant materials shall at least comply with national laws (at initial certification – entry level).

6.1.3 Raw sewage shall not be used to irrigate crops (at initial certification – entry level).

¹ Targeted Threshold for presence of GMO is 0.1% with an adventitious GM presence level of up to 0.9%.

6.1.4 Smallholders shall discharge sewage/effluents in a manner that does not cause pollution to water and does not contaminate the soil or crops (at the beginning of the third years of certification – intermediate level).

Guidance: Hazardous wastes include but are not limited to batteries, fluorescent lamps, tires, used lubricant oil.

Pollutant materials include but are not limited to oil derivatives and fuels. Appropriate facilities include drum spill containment basins with oil water separation system, machinery filling stations, and machinery washing stations built in accordance with legal requirements.

If sewage is to be used or otherwise incorporated back into any production system, it must be treated to assure that water that is released back into the environment is safe.

When using raw manure as fertilizer, composting is recommended before application to fields.

PRINCIPLE 7: Water management

7.1 Conservation of natural water resources

7.1.1 Smallholders shall conserve quantity and quality of existing natural water resources, such as lakes, rivers, artificial lakes, dams, water tables and aquifers around their facilities (at the beginning of the third years of certification – intermediate level).

PRINCIPLE 8: Adoption of good agricultural practices

8.1 Systems of good practices

8.1.1 Smallholders shall understand the importance and the key aspects of good agricultural practices (at initial certification – entry level).

8.1.2 Smallholders shall adopt agricultural good practices and, where possible, adopt conservation systems such as Integrated Pest Management (IPM) and organic agricultural practices (at the beginning of the third years of certification – intermediate level).

Guidance: Good practices include methods that build soil, protect water, reduce chemical usage, and foster biodiversity.

8.2 Soil and crop management

8.2.1 Smallholders shall define a soil and crop management regime that monitors soil quality, builds soil, enhances fertility and manages pests and diseases (at the beginning of the third years of certification – intermediate level).

8.2.2 Smallholders shall minimise soil erosion and damage to soil structure caused by wind, water, human activity and presence of farm animals (at the beginning of the third years of certification – intermediate level).

Guidance: Evaluate suitability of the soil for production of specific crops and to define a soil management regime.

As much as possible smallholders should reduce the use of chemical fertilizer.

Production practices should maintain vegetative cover for as long as possible throughout the year. Techniques such as deep-rooting green crops; mulching; using low pressure tires, for example, should be considered.

8.3 Documentation of agricultural production

- 8.3.1 Smallholders shall maintain records of all agricultural production, including all seed records (at the beginning of the third years of certification – intermediate level).

Guidance:

Recordkeeping is adapted to the smallholder circumstance and should include:

- Information on the workers (name, activity and payment);
- Invoices of purchase of seeds, which should at least include supplier's name, date of purchase, variety and/or brand name, quantity and lot number.

If the seed invoice does not include the above-mentioned information, then information shall be recorded independent of the invoice;

- Seed certificates and seed bag labels
- Records of seeds produced by the farm;
- Each season's records identifying the seeds and their source used for planting each crop.

Harvest records include:

- crop succession and rotation for each field
- crop weight
- yield
- identification of the field from which the crop was harvested
- seed lots and variety used
- harvest date
- pest and diseases
- other soil and crops information and management practices

8.4 Management of propagation material

- 8.4.1 Seeds, seedlings, and propagation materials shall be selected for quality and performance for the region (at the beginning of the third years of certification – intermediate level).

Guidance: Smallholders may report verbally on their own propagation materials. They may report if they save their own seed or propagate from their own existing stocks.

8.5 Reduction of toxic and polluting materials

8.5.1 Pesticides listed in the WHO classes 1a, 1b lists, Rotterdam Convention and Stockholm Convention, as well as pesticides forbidden by local, national, and regional law, may not be used. (at initial certification – entry level).

8.5.2 Smallholders shall only use pesticides on crops and for target species for which they are legally allowed, at the prescribed dosage, during the required timeframe and/or crop conditions, as defined in local laws and regulations and by manufacturers' recommendations at least (at initial certification – entry level).

8.5.3 Smallholders shall avoid or reduce the use of toxic or polluting materials whenever possible and shall select agrochemical inputs having the least possible toxicity and environmental impact for the required application (at the beginning of the third years of certification – intermediate level).

8.5.4 Smallholders shall use non-chemical weed control methods whenever possible, such as mechanical methods and management of crop rotations, crop succession and intercropping (at the beginning of the third years of certification – intermediate level).

Guidance: Smallholders who use agrochemicals for pests, diseases, and weeds shall employ strategies like the use of ecologically sound biological controls for the target pests or disease where applicable, to minimize agrochemical use. This will include a programme of pesticide rotation designed to minimize development of pest resistance.

8.6 Management of agrochemicals and chemical residues

8.6.1 Agrochemicals, including pesticide, shall be applied using methods that minimise harm to human health, wildlife, plant biodiversity, and water and air quality (at initial certification – entry level).

8.6.2 Pesticides shall be handled, stored, transported, and disposed of according to manufacturers' instructions, legal requirements, or according to procedures documented to be superior (at initial certification – entry level).

8.6.3 Smallholders shall not engage in pesticide spraying over bodies of water, or over preserved, protected or residential areas, in compliance with regional, national, and local regulations (at initial certification – entry level).

8.6.4 In crop areas adjacent to roads or residential areas where access by people is possible, recently sprayed areas shall be marked appropriately to warn people not to enter such areas (at the end of the third years of certification – intermediate level).

Guidance: Pesticides shall be sprayed as per local regulation requirements in terms of distance from populated areas and bodies of water. In the absence of such regulation, pesticides shall not be sprayed within 100 meters of human populated areas (residences, schools, medical centres, ect) and bodies of water.

Pesticides shall be stored and transported in original containers or in other appropriate containers clearly labelled to identify contents. Certified Organisations shall follow manufacturer's recommendations and legal requirements for disposing of agrochemical wastes and empty pesticide containers, and for cleaning all application equipment. Certified Organisations shall triple rinse empty pesticide containers with water, then perforate to prevent reuse, and when possible return containers to the supplier, or to facilities designed to handle such wastes.

PRINCIPLE 9: Traceability and Chain of Custody

9.1 Chain of Custody System

9.1.1 Smallholders shall have sufficient documentation and records to demonstrate traceability (at the beginning of the third years of certification – intermediate level).

8.1.2 Smallholders shall define a method to keep track of each received or shipped raw material or product consignments, as well as processing lots and final product lots, where applicable, linked to the traceability information pertaining to the same (at the beginning of the fifth years of certification – advanced level).

Guidance: An example of a method is attributing a number or a colour to each consignment in a given year.

Attachment A – Farm sampling methodology

Sampling Criteria

The application of the sampling criteria considered in the context of the **ProTerra Indian interpretation** can be used when a same producer has multiple production areas (farms) under the same management, farms have a similar operation reality or when a processor is supplied by multiples farms. In all cases, should there be a farm administrative headquarter, this location must be included in the Certification audit site visit. The table below indicated the sampling criteria to be used.

The farm selection should also include among others the following aspects:

- Significant variations in the size of the sites;
- Differences in culture, language and regulatory requirements; and
- Geographical dispersion.

The sampling criterion below shall be applied.

Table A.1 - Sampling Criterion

Type	Criterion *	Observations
Certification audit	a minimum of 100 supplying farm of an industry	As far as possible, the CB should visit farms not visited in the previous audit.

**This criterion is to be revised after the first or second year of the application of this interpretation. Revision should be based in the practical experience gained and should aim at defining a statistically representative sample size.*

Audit duration

The minimum audit duration per farm sampled is a minimum of 2 (hours). In special cases, the audit duration shall be increased when:

- a. Views or concerns of interested parties deem this precaution necessary;
- b. Additional or unusual environmental aspects, social issues or regulated conditions exists, or
- c. Any other aspects necessitating additional audit time.