



Table of comparison between requirements of ProTerra Standard Version 3 and ProTerra Standard Version 4 (minor editorial differences may exist)

ProTerra V3.0 (December 28, 2014)	ProTerra V4.0	OBS
<p>(Approved by the Board of ProTerra Foundation 28, December 2014)</p> <p>INTRODUCTION</p> <p>The ProTerra Standard for Social Responsibility and Environmental Sustainability is based on the Basel Criteria on Responsible Soy, published in 2005. The aim of the ProTerra Standard is to foster good agricultural practice, the protection of high conservation value areas, the environment and biodiversity in general, rural workers as well as communities by linking production and demand of non-GMO commodities in full traceability.</p> <p>This is Version 3.0 of the ProTerra Standard, which has gone through a transparent and public stakeholder consultation process. The first consultation round took place from 1, August to 30, September</p>	<p>ProTerra Foundation is a non-for-profit organisation that envisages a world where all businesses contribute to the protection of biodiversity by switching to sustainable production, conserve natural resources and ensure that workers and local communities are treated with dignity and respect. The ProTerra Foundation owns the ProTerra Certification Standard and related audit methodology. More information www.proterrafoundation.org</p> <p>The ProTerra Foundation Vision and Mission Statement</p> <p>The ProTerra Foundation's mission is to be a global network of businesses supporting more sustainable agricultural practices, in the</p>	<p>Text in blue removed in version 4.0. /Text in red added to version 4.0</p>

2014; the second phase took place from 15, November to 15, December 2014 with a transparent tracking of the changes. During and after the two consultation rounds, the ProTerra Certification and Standard Committee has discussed and decided on the inputs provided through the consultation process.

For any comment or question with regard to the ProTerra Standard, please contact standards@proterrafoundation.org.

THIS IS A DOCUMENT FOR A CONTROLLED REVISION PROCESS

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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 ensure that local communities are treated with dignity and respect.

Businesses enterprises which support the ProTerra Foundation mission and vision may sign a membership declaration to commit to:

- Support the credibility of the ProTerra Certification Standards and their adaptability to the reality they operate in.
- Raising awareness about impact on biodiversity and climate change.
- Empowering farms and businesses throughout the food supply chain, to become vectors of environmentally and socially responsible business practices.

The ProTerra Standard is based on the Basel Criteria on Responsible Soy, published in 2004. It has four core aims:

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

5

This Version 4.0 of the ProTerra Standard has gone through a transparent and public stakeholder consultation process that took place from 19 February to 20 April 2018. During and after the consultation process, the ProTerra Foundation Certification and Standard Committee discussed all the comments received and

	<p>decided on the aspects to be incorporated in this revision of the Standard.</p> <p>The ProTerra Foundation acknowledges the feedback and suggestions received from all stakeholders that have supported the strengthening of the ProTerra Standard version 4.0 – 2018.</p> <p>The summary of changes and stakeholders’ comments are made available in the ProTerra Foundation website.</p> <p>For any comment or question with regard to the ProTerra Standard, please contact standards@proterrafoundation.org</p> <p>Disclaimer: The trademarks, logos, and service marks not owned or licensed by the ProTerra Foundation that are referenced in this document are the registered and unregistered marks of their respective owners. No rights are granted by ProTerra Foundation to use such marks, whether by implication, estoppels, or otherwise. ProTerra® is a registered mark.</p> <p>The ProTerra Standard Principles</p> <p>The ProTerra Certification Standard is organised in principles, criteria and indicators. These are the ProTerra Standard ten principles:</p> <p>PRINCIPLE 1: Compliance with law, international conventions and the ProTerra Standard</p> <p>PRINCIPLE 2: Human rights and responsible labour policies and practices</p>	
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	<p>PRINCIPLE 3: Responsible relations with workers and community</p> <p>PRINCIPLE 4: Biodiversity conservation, effective environmental management and environmental services</p> <p>PRINCIPLE 5: No use of Genetically Modified Organisms (GMOs)</p> <p>PRINCIPLE 6: Pollution and waste management</p> <p>PRINCIPLE 7: Water Management</p> <p>PRINCIPLE 8: Greenhouse gases and energy management</p> <p>PRINCIPLE 9: Adoption of good agricultural practices</p> <p>PRINCIPLE 10: Traceability and Chain of Custody</p> <p>Organisations become ProTerra certified by demonstrating adherence to each principle, criteria and indicators of the Standard that are relevant to their business.</p> <p>The Principle 10: Traceability and Chain of Custody applies to the three levels of operations considered part of the scope of the ProTerra Standard.</p> <p>The organisations that act only as chain of custody economic operators are to be audited against:</p> <ul style="list-style-type: none"> • The indicators within the ProTerra Principles that make specific reference to Level II (see 1.1 Levels of Certification below); • Principle 10: Traceability and Chain of Custody and, if applicable • Principle 5: No use of Genetically Modified Organisms (GMO). <p>The ProTerra Labelling</p> <p>The ProTerra product packaging label is a mean by which brands can communicate the non-GMO and sustainability commitment directly to consumers and stakeholders. Final consumers can be assured that all products featuring the ProTerra label were produced in a sustainable and traceable manner and meet our non-GMO requirements.</p>	
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<p>SECTION I – Scope of Certification</p> <p>Certification is applicable to distinct levels of operation across the food production chain:</p> <ul style="list-style-type: none"> • Level I – Agriculture • Level II – Transport and Storage • Level III – Industrial Processing • Chain of Custody <p>Production under the ProTerra Standard can be agricultural or industrial. Agricultural production is the growth of crops and seed. Any operation that transforms the agricultural production output, such as a crushing plant or a food product manufacturer, is considered as industrial production.</p> <p>Chain of Custody, on the other hand, is for organisations that only handle the material and pass it on as is.</p> <p>The production certified organisations also have chain of custody elements as they have to comply with traceability indicators as per requirements in the standard, and also function as gathering points.</p> <p>Chain of custody operators have a more limited scope and only have to comply with criteria and indicators of Principle 10.</p> <p>ProTerra Certification can apply to raw materials, ingredients or multi-ingredient products. This may be accomplished using two basic approaches:</p> <ol style="list-style-type: none"> Each link in the supply chain can be certified in its own right to the ProTerra program; or Certified organisations that use ingredients from sources that are not ProTerra certified in their own right may implement systems to control and monitor these supply 	<p>Section I: The Scope of Certification</p> <p>1.1 Levels of Certification</p> <p>The ProTerra Certification is applicable to distinct levels of operation across the food and feed production chains:</p> <ul style="list-style-type: none"> • Level I: Agricultural production • Level II: Transport, Storage, Traders and Dealers • Level III: Industrial Processing <p>In the context of this Standard, food and feed production can be agricultural or industrial.</p> <ul style="list-style-type: none"> • Agricultural production is the growth of crops and seeds. The unit of certification includes the entire farm, both nongrowing activities and noncultivated areas, including all activities ongoing on site at the time of certification. • Industrial production refers to any operation that transforms the agricultural production output, such as a crushing plant or a food product manufacturer. <p>1.2 Raw materials, ingredients or multi-ingredient products</p> <p>The ProTerra Certification can apply to raw materials, ingredients or multi-ingredient products. This may be accomplished using two basic approaches:</p> <ul style="list-style-type: none"> • Each actor in the food and feed supply chain can be certified in its own right against the relevant ProTerra Standard set of indicators or • Certified organisations that use inputs from actors that are not ProTerra certified in their own right shall implement systems to control and monitor its supply chain(s) to ensure that the relevant ProTerra Standard indicators are met. In this case the verification of this system will be considered as part of the user's 	
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<p>chain(s) to ensure that the ProTerra criteria are met; in this case the verification of this system will be considered as part of the user's own ProTerra certification responsibilities and verified by the certification body.</p> <p>Because of its broad scope and distinct levels of operations, not all of the indicators are applicable to all types of certified operations. The standard indicates the applicability of each indicator regarding each of the three levels of operation within the food production chain: I Agriculture, II Transport and Storage, and III Industrial Processing. Chain of Custody is addressed in Principle 10. The ProTerra Standard distinguishes between CORE indicators and other indicators. To be ProTerra certified, organisations have to comply with CORE indicators to 100% and with all the indicators to 80%.</p>	<p>own ProTerra certification responsibilities and verified by the Certification Body.</p> <p>1.3 Principles, criteria and indicators</p> <p>The ProTerra Certification Standard is organised in Principles, criteria and indicators. Because of its broad scope and distinct levels of operations, not all of the indicators are applicable to all types of operations.</p> <p>The standard indicates the applicability of each indicator regarding each of the three levels of operation within the food and feed production chain.</p> <p>The ProTerra Standard distinguishes between core indicators and non-core indicators. To be ProTerra certified, organisations have meet 80% of all indicators, in which all core indicators are included. For smallholder farmers all Level I indicators are applicable except if explicitly indicated otherwise in the guidance.</p> <p>Both core and non-core indicators bear tags that facilitate analysis and generation of specific footprints. Below the classification of tags and their meaning.</p> <p>LAW L Indicators that refer to legal aspects or authorities SOCIETY S Indicators that refer to social responsibility BIODIVERSITY B Indicators that refer to environment and good agricultural practices</p>	
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	<p>ECONOMICS E Indicators that refer to economic aspects</p> <p>TRANSPARENCY T Indicators that refer to traceability and transparency</p> <p>FEED FOOD SAFETY F Indicators linked to feed and food safety</p> <p>Those organizations that act only as chain of custody economic operators, Level II, have a more limited scope in relation to this Standard and are only audited under Principle 10 - Traceability and Segregated Chain of Custody and, if applicable, Principle 5 - Genetically Modified Organisms not used, and those indicators that make specific reference to Level II.</p> <p>ProTerra Certification can apply to raw materials, ingredients or multi-ingredient products. This may be accomplished using two basic approaches:</p> <ul style="list-style-type: none"> (i) Each link in the supply chain can be certified in its own right to the ProTerra program; or (ii) Certified organisations that use inputs from sources that are not ProTerra certified in their own right shall implement systems to control and monitor these supply chain(s) to ensure that the ProTerra criteria are met; in this case the verification of this system will be considered as part of the user's own ProTerra certification responsibilities and verified by the certification body. 	
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	<p>Because of its broad scope and distinct levels of operations, not all of the indicators are applicable to all types of certified operations. The standard indicates the applicability of each indicator regarding each of the three levels of operation within the food production chain: I Agricultural Production, II Transport, Storage, Traders and Dealers, and III Industrial Processing. Chain of Custody is addressed in Principle 10.</p> <p>The ProTerra Standard distinguishes between CORE indicators and other indicators. To be ProTerra certified, organisations have to comply with CORE indicators to 100% and with all the other indicators to 80%.</p> <p>For smallholders farmer all indicators are applicable except if explicitly indicated otherwise in the guidance (in this case a small farmers is the entity under certification).</p>	
SECTION II – Principles, Criteria, Indicators and Guidance	SECTION II – Principles, Criteria, Indicators and Guidance	
PRINCIPLE 1 - Compliance with law, international accords and the ProTerra Standard	PRINCIPLE 1 - Compliance with law and the ProTerra Standard	
1.1 Comply with all applicable national and local laws, regulations, and applicable international conventions.	1.1 Comply with all applicable national and local laws, regulations, and applicable international conventions.	No modification
1.1.1 Levels I, II and III CORE - Certified organisations shall implement procedures to assure consistent compliance. Guidance: Requirement for legal compliance applies with regard to all Principles and their respective Criteria and Indicators. A list of relevant international treaties and conventions is found in Appendix B. In the case of smallholders, this responsibility lays with farmer groups, co-operatives or first processors.	1.1.1 Levels I and III CORE - Certified organisations shall implement procedures to assure consistent compliance. Guidance: Requirement for legal compliance applies with regard to all Principles and their respective Criteria and Indicators. A list of relevant international treaties and conventions is found in Appendix B. In the case of smallholders, this responsibility lays with farmer groups, cooperatives or first processors. The most stringent rule shall always apply and if the ProTerra Standard exceeds national or local regulatory requirements, certified organisations shall adhere to	Level II excluded

	the Standard. In the case of smallholders, this responsibility lays with farmer groups, cooperatives or first processors.	
1.1.2 Levels I, II and III CORE - Certified organisations shall document and retain records of compliance for at least 5 years or longer if required by local law. Guidance: In the case of smallholders, this responsibility lays with farmer groups, co-operatives or first processors.	1.1.2 Levels I and III CORE - Certified organisations shall document and retain records of compliance for at least 5 years or longer if required by local law. Guidance: In the case of smallholders, this responsibility lays with farmer groups, cooperatives or first processors.	Level II excluded
1.1.3 Levels I, II and III CORE - Certified organisations and subcontractors shall keep copies of up-to-date national and local legislation on site or demonstrate on-line access to these. Guidance: In the case of smallholders, this responsibility lays with farmer groups, co-operatives or first processors	1.1.3 Levels I, II and III CORE - Certified organisations and subcontractors shall keep copies of up-to-date national and local legislation on site or demonstrate on-line access to these. Guidance: In the case of smallholders, this responsibility lays with farmer groups, cooperatives or first processors	Level II excluded
1.1.4 Levels I, II and III CORE - Certified organisations shall demonstrate clear title to land in accordance with national practice and law. Guidance: Examples of land title are ownership deed, lease, or other appropriate legal agreement.	1.1.4 Levels I and III CORE - Certified organisations shall demonstrate clear title to land in accordance with national practice and law. Guidance: Examples of land title are ownership deed, lease, or other appropriate legal agreement.	Level II excluded
1.1.5 Levels I, II and III If the ProTerra Standard exceeds national or local regulatory requirements, certified organisations shall adhere to the Standard and/ or if the standards set in international treaties or conventions exceed local or national laws of the country where certification is sought, certified organisations shall adhere to the international treaties		Deleted in version 4.0. See text added to 1.1.1 in red
1.1.6 Levels II and III CORE - Suppliers of core inputs and services shall be compliant with the ProTerra Standard. Guidance: For instance, for a coffee processor's output to be compliant with the ProTerra Standard, the coffee, itself, must be produced in compliance with the ProTerra Standard. Compliance of	1.1.5 Levels I and III CORE - Suppliers of core inputs and services shall be compliant with the ProTerra Standard. .	Level II excluded Guidance excluded.

the processing plant, alone, is not sufficient. Core and non-core suppliers are defined in the Definitions section of the Standard.		
<p>1.1.7 Levels I, II and III</p> <p>Where applicable, outgrower suppliers outside the supply area or group for the certification production of the certified organisation must comply with human rights and labour standards set down on Principle 2.</p>	<p>1.1.6 (Levels I, II and III)</p> <p>Certified organisations must obtain from supplier outside the certification scope a formal and signed commitment that they comply with legal requirements, including those regulations associated to human rights, labour laws and environmental regulations.</p>	<p>The term outgrower will be no longer used.</p> <p>Level II excluded</p>
1.2 Continuous improvement	1.2 Continuous improvement	No modification
<p>1.2.1 Levels I, II and III</p> <p>Certified organisations shall demonstrate continuous improvement regarding compliance with ProTerra Standard.</p> <p>Guidance: Compliance is evidenced from the second year of certification. Examples of evidence can be implementation of corrective action plans, as well as actions as regards social, environmental, agricultural and technical aspects of the operation. Evidence must be proportional to the size and complexity of the operation – for example in a smallholder farm, continuous improvement can be evidenced by better practices and improvements in facilities and equipment.</p>	<p>1.2.1 Levels I and III</p> <p>Certified organisations shall demonstrate continuous improvement regarding compliance with ProTerra Standard.</p> <p>Guidance: Compliance is evidenced from the second year of certification. Examples of evidence can be implementation of corrective action plans, as well as actions associated to social, environmental, agricultural and technical aspects of the operation. Evidence must be proportional to the size and complexity of the operation – for example in a smallholder farm, continuous improvement can be evidenced by better practices and improvements in facilities and equipment.</p>	Level II excluded
1.3 Use of ProTerra logo, seal, trustmark and certificates	1.3 Use of ProTerra logo, seal, trustmark and certificates	No modification
<p>1.3.1 Levels I, II and III</p> <p>ProTerra certified materials and products shall be identified using correct claims, ProTerra logo, seal and certificates, according to the Guidelines and Requirements for the Use of the ProTerra Logo and Seal.</p>	<p>1.3.1 Levels I, II and III</p> <p>ProTerra certified materials and products shall be identified using correct claims, ProTerra logo, seal and certificates, according to the Guidelines and Requirements for the Use of the ProTerra Logo and Seal.</p>	No modification
Principle 2 – Human Rights and Responsible personnel policies, labour practices	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 Absence of slave and forced labour, child labour, and coercive disciplinary or control methods.	No modification
2.1.1 Levels I, II and III CORE - Certified organisations shall not use slave labour, forced labour, indentured servants, and their equivalents. Guidance: This applies also to workers supplied by third parties and contracted labour, including migrant and seasonal workers	2.1.1 Levels I and III CORE - Certified organisations shall not use slave labour, forced labour, indentured servants, and their equivalents. Guidance: This applies also to workers supplied by third parties and contracted labour, including migrant and seasonal workers.	Level II excluded
2.1.2 Levels I, II and III CORE - No worker will be required to lodge their identity papers with their employer or any third party and workers pay, benefits or other property shall, likewise, not be retained.	2.1.2 Levels I and III CORE - No worker will be required to lodge their identity papers with their employer or any third party and workers pay, benefits or other property shall, likewise, not be retained.	Level II excluded
2.1.3 Level I Accompanying family members (children and spouses) shall not be required to work on the farm .	2.1.3 Level I and III Accompanying family members (children and spouses) shall not be required to work on the on the premises of the certified organisation . Guidance: This is not applicable to smallholders.	Level III added. Text in guidance added as outcome from Public Consultation outcome
2.1.4 Levels I, II and III CORE - Child labour, except in contexts permitted within national law and the ILO, shall not be used in certified organisations. Guidance: a. Minimum age for labourers shall be 15 years or the age mandated by local law, whichever is older . b. In family agriculture, child labour can be allowed provided that it is not abusive or dangerous, and does not interfere with the health, education and school attendance of the child.	2.1.4 Levels I and III CORE - Child labour, except in contexts permitted within national law and the ILO, whatever is more stringent , shall not be used in certified organisations. Guidance: Refer to ILO Convention 138 definition including light work and special protection for young workers . In family agriculture, child labour can be allowed 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.	Level II excluded In red text added as outcome from Public Consultation
2.1.5 Levels I, II and III	2.1.5 Levels I and III	Level II excluded

CORE - 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.	CORE - 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.	
2.2 Weekly working hours and overtime	2.2 Weekly working hours and overtime	No modification
2.2.1 Levels I, II and III CORE - The workweek shall be set according to local and national laws, shall be consistent with local industry standards, and shall, at maximum, not routinely exceed 48 hours per week (not including overtime). Collective agreements and agreements with Labour Unions take precedence over the working hours determined by law.	2.2.1 Levels I, II and III CORE - The workweek shall be set according to local and national laws, shall be consistent with local industry standards, and shall, at maximum, not routinely exceed 48 hours per week (not including overtime). Where agreement with trade unions exists related to weekly working hours and overtime, these will be respected.	Level II excluded
2.2.2 Levels I, II and III CORE - Overtime shall be limited as specified in local and national law, and shall not routinely exceed 12 hours per week.	2.2.2 Levels I and III CORE - Overtime shall be limited as specified in local and national law, and shall not routinely exceed 12 hours per week.	Level II excluded
2.2.3 Levels I, II and III Overtime in excess of 12 hours is only allowable if it happens in extraordinary, limited periods where there are time constraints or risk of economic loss and where conditions regarding overtime in excess of 12 hours have been agreed between workers and management. Guidance: The work time limits are flexible in that it is recognized 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. The indicator set down in 2.2.5 shall be respected during such periods.	2.2.3 Levels I and III CORE - Overtime in excess of 12 hours is only allowable if it happens in extraordinary, limited periods where there are time constraints or risk of economic loss and where conditions regarding overtime in excess of 12 hours have been agreed between workers and management. Where agreement with trade unions exists related to excess overtime, these will be respected. Guidance: The work time limits are flexible in that it is recognized 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. The indicator set down in 2.2.5 shall be respected during such periods.	Level II excluded Made CORE In red as per public consultation outcome (no modification to guidance).
2.2.4 Levels I, II and III	2.2.4 Levels I and III	Level II excluded

Overtime shall be compensated as required by law or according to collective agreement or agreement with the Labour Union or, in the lack of those, at a premium rate. Guidance: Legal dispositions which allow exchange of overtime hours for extra days off shall be taken into consideration.	CORE -Overtime shall be compensated as required by law or according to collective agreement or agreement with the Labour Union or, in the lack of those, at a premium rate. Guidance: Legal dispositions which allow exchange of overtime hours for extra days off shall be taken into consideration.	Made CORE
2.2.5 Levels I, II and III All overtime work shall be voluntary.	2.2.5 Levels I and III CORE - All overtime work shall be voluntary.	Level II excluded Made CORE
2.2.6 Levels I, II and III In all cases workers are entitled to at least one day off following 6 consecutive days of work.	2.2.6 Levels I and III In all cases workers are entitled to at least one day off following 6 consecutive days of work. Where agreement with trade unions exists related to day off/rest days these will be respected.	Level II excluded In red as per public consultation outcome
2.3 Personnel Management Program	2.3 Personnel Management Program	
2.3.1 Levels I, II and III The certified organisation shall structure, implement and document a personnel management program consistent with and proportional to the needs of the organisation. Guidance: This indicator is not applicable to smallholder/family farmers.	2.3.1 Levels I and III The certified organisation shall structure, implement and document a personnel management program consistent with and proportional to the needs of the organisation. Guidance: This indicator is not applicable to smallholder.	Level II excluded
2.3.2 Levels I, II and III The certified operation shall assign a staff member to implement and manage the personnel management program. Guidance: This indicator is not applicable to smallholder/family farmers.	2.3.2 Levels I and III The certified operation shall assign a staff member to implement and manage the personnel management program. Guidance: This indicator is not applicable to smallholder.	Level II excluded
2.4 Equal opportunities and treatment for workers	2.4 Equal opportunities and treatment for workers	
2.4.1 Levels I, II and III CORE - All workers, applicants and subcontractors shall have equal employment opportunities, equal 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, sex, religion, political opinion, national extraction or social	2.4.1 Levels I and III CORE - All workers, applicants and subcontractors shall have equal employment opportunities, equal 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,	Level II excluded

<p>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).</p> <p>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 basic compensation due to all workers in the operation.</p>	<p>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).</p> <p>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 basic compensation due to all workers in the operation.</p>	
2.5 Workers’ working and living conditions	2.5 Workers’ working and living conditions	
<p>2.5.1 Levels I, II and III</p> <p>CORE - All workers, regardless of age or gender, shall enjoy appropriate, legally compliant working conditions.</p>	<p>2.5.1 Levels I and III</p> <p>CORE - All workers, regardless of age, gender, or other personal characteristic, shall enjoy appropriate, legally compliant working conditions.</p>	Level II excluded
<p>2.5.2 Level I</p> <p>All workers living on site shall have appropriate, fairly priced, and safe food, water and housing.</p> <p>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.</p>	<p>2.5.2 Level I</p> <p>CORE - All workers living on site shall have appropriate, fairly priced, and safe food, water and housing</p> <p>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.</p>	Made CORE as per public consultation outcome
2.6 Clear and comprehensive labour contracts and legal rights	2.6 Clear and comprehensive labour contracts and legal rights	
2.6.1 Levels I, II and III	2.6.1 Levels I and III	Level II excluded.

<p>CORE - All workers directly employed, contracted, subcontracted including temporary workers shall have an employment contract written in a language understandable by the worker and signed by the employer and employee or the employees' labour representatives. Contracts typically include pay rate, working hours, deductions, overtime conditions, vacation time, conditions for sickness and maternity leave, grounds for dismissal, period of notice.</p>	<p>CORE - All workers directly employed, contracted, including temporary workers, shall have an employment contract or equivalent document understandable by the worker and signed by the employer and employee or the employees' labour representatives. Contracts typically include pay rate, working hours, deductions, overtime conditions, vacation time, conditions for sickness and maternity leave, grounds for dismissal, period of notice.</p> <p>Should the cultural context, in a relevant and unquestionably manner, not consider a written contract this should be taken in consideration and is applicable only to smallholders.</p>	<p>Text in red is an outcome of public consultation.</p>
<p>2.6.2 Levels I, II and III</p> <p>There shall be a signed work agreement between the certified organisation and the subcontractor.</p>	<p>2.6.2 Levels I and III</p> <p>CORE -There shall be a signed work agreement between the certified organisation and subcontracted companies that includes clauses requiring compliance with labour and legal rights of employees.</p>	<p>Level II excluded. Made CORE</p>
<p>2.6.3 Levels I, II and III</p> <p>Certified organisations shall communicate legal rights, contracts and agreements to their personnel in simple language and style that workers can easily understand and comply with.</p> <p>Guidance: The operation shall assign a person or persons to be responsible for maintaining and updating such information, and shall identify that person to the Certification Body. This indicator is not applicable to smallholder/family farmers.</p>	<p>2.6.3 Levels I and III</p> <p>Certified organisations shall communicate legal rights, contracts and agreements to their personnel in simple language and style that workers can easily understand and comply with.</p> <p>Guidance: The operation shall assign a person or persons to be responsible for maintaining and updating such information, and shall identify that person to the Certification Body. This indicator is not applicable to smallholder.</p>	<p>Level II excluded</p>
<p>2.6.4 Levels I, II and III</p> <p>The certified organisation shall maintain personnel records for each employee for at least 5 years or longer if required by local law.</p> <p>Guidance: Personnel records will include for each employee their contract, their current status and history, job title, salary, training, hours worked, and vacation time accrued. This indicator is not applicable to smallholder/family farmers.</p>	<p>2.6.4 Levels I and III</p> <p>The certified organisation shall maintain personnel records for each employee for at least 5 years or longer if required by local law.</p> <p>Guidance: Personnel records will include for each employee their contract, their current status and history, job title, salary, training, hours worked, and vacation time accrued. This indicator is not applicable to smallholder.</p>	<p>Level II excluded</p>

2.7 Qualification, working experience and training of workers	2.7 Qualification, working experience and training of workers	No modification
<p>2.7.1 Levels I, II and III</p> <p>Worker job descriptions, including necessary skills and legal status, and salary range shall be set in written form.</p> <p>Guidance: All employed and/or subcontracted workers shall have the necessary qualifications, experience, meet legal requirements to fulfil their job. Written description of jobs, skills, legal status and salary range will serve as the basis for the operation's demonstration that this indicator is being met. This indicator is not applicable to smallholder/family farmers.</p>	<p>2.7.1 Levels I and III</p> <p>CORE - Worker job descriptions, including necessary skills and legal status, and salary range shall be set in written form.</p> <p>Guidance: All employees and/or subcontracted workers shall have the necessary qualifications, experience, meet legal requirements to fulfil their job. Written description of jobs, skills, legal status and salary range will serve as the basis for the operation's demonstration that this indicator is being met. This indicator is not applicable to smallholder.</p>	<p>Level II excluded.</p> <p>Made CORE.</p>
<p>2.7.2 Levels I, II and III</p> <p>An ongoing program of job-related training and regular refresher training shall be provided to all workers to ensure that they are competent to conduct their work efficiently, effectively and safely.</p> <p>Guidance: If this criterion is first being met during the initial year that ProTerra certification is achieved, the certification body will waive the retroactive aspect of it for the first year of certification. Certified organisation shall provide all employees with training regarding (a) sustainability; (b) GMOs where applicable; and (c) their specific tasks, roles and responsibilities. This indicator is not applicable to smallholder/family farmers.</p>	<p>2.7.2 Levels I and III</p> <p>An ongoing program of job-related training including regular refresher training shall be provided to all workers to ensure that they are competent to conduct their work efficiently, effectively and safely.</p> <p>Guidance: Certified organisation shall provide all employees with training regarding for example (a) sustainability; (b) GMOs where applicable; and (c) their specific tasks, roles and responsibilities. This indicator is not applicable to smallholder.</p>	<p>Level II excluded.</p> <p>In blue text removed as a result of public consultation outcome.</p>
<p>2.7.3 Levels I, II and III</p> <p>Certified organisations shall maintain records for all training for a minimum of 5 years, or longer if specified by local regulations.</p> <p>Guidance: The following information shall be included in these records: date, time, attendees, trainer, and content material used during training. This indicator is not applicable to smallholder/family farmers.</p>	<p>2.7.3 Levels I and III</p> <p>Certified organisations shall maintain records for all training for a minimum of 5 years, or longer if specified by local regulations.</p> <p>Guidance: The following information shall be included in these records: date, time, attendees, trainer, and content material used during training. This indicator is not applicable to smallholder.</p> <p>During the initial four years following the granting of the ProTerra Certification, the certified organisation should maintain records covering the period of time for which they have been certified.</p>	<p>Level II excluded.</p>

2.8 Salaries, payments and benefits	2.8 Salaries, payments and benefits	
<p>2.8.1 Levels I, II and III</p> <p>CORE - All workers, regardless of age or gender, shall be paid a fair, locally representative wage or salary, which shall meet or exceed the Minimum or Basic Salary or Wage (Minimum Wage) legally established for the region. If no Minimum Wage law exists, compensation shall at least meet the typical salaries usually paid in that region for the equivalent function or job.</p> <p>Guidance: The operation must demonstrate to the certification body and its auditors how it arrived at its determination that it has met this indicator.</p>	<p>2.8.1 Levels I and III</p> <p>CORE - 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. If no Legal Minimum Wage exists, compensation shall at least meet the typical salaries usually paid in that region for the equivalent function or job.</p> <p>Guidance: The operation must demonstrate to the certification body and its auditors how it arrived at its determination that it has met this indicator.</p>	Level II excluded.
<p>2.8.2 Levels I, II and III</p> <p>CORE - Piece work shall be paid at a rate that assures workers (female and male) will be capable of earning at least a legal minimum wage.</p>	<p>2.8.2 Levels I and III</p> <p>CORE - Piece work shall be paid at a rate that assures workers (female and male) will be capable of earning at least a legal minimum wage.</p>	Level II excluded.
<p>2.8.3 Levels I, II and III</p> <p>CORE - Wages or salaries and hours worked shall be regularly and legally paid in the national currency, documented and recorded.</p> <p>Guidance: Payment shall be at least monthly unless workers or their representatives expressly agree that it can be less frequent, the terms of which are specified in writing and signed by said parties.</p>	<p>2.8.3 Levels I and III</p> <p>CORE - Wages or salaries and hours worked shall be regularly and legally paid in the national currency, documented and recorded.</p> <p>Guidance: Payment shall be at least monthly unless workers or their representatives expressly agree that it can be less frequent, the terms of which are specified in writing and signed by said parties.</p>	Level II excluded.
<p>2.8.4 Levels I, II and III</p> <p>CORE - Employer shall not deduct from wages for disciplinary or similar purposes.</p> <p>Guidance: Deductions for social security or other legally mandated programs are acceptable.</p>	<p>2.8.4 Levels I and III</p> <p>CORE - Employer shall not deduct from wages for disciplinary or similar purposes.</p> <p>Guidance: Deductions for social security or other legally mandated programs are acceptable.</p>	Level II excluded.
<p>2.8.5 Levels I, II and III</p> <p>A social security plan shall be established for the workers in regions where such a plan is not required by law or regulation.</p>	<p>2.8.5 Levels I and III</p> <p>A social security plan shall be established for the workers in regions where such a plan is not required by law or regulation.</p>	Level II excluded.

<p>Guidance: The plan shall include timelines for implementation, as well as age requirements for receiving benefits and other related conditions/situations where benefits would be available. The impact of such a social security plan on regular worker pay amounts shall be specified in the plan description. This indicator is not applicable to smallholder/family farmers.</p>	<p>Guidance: The plan shall include timelines for implementation, as well as age requirements for receiving benefits and other related conditions/situations where benefits would be available. The impact of such a social security plan on regular worker pay amounts shall be specified in the plan description. This indicator is not applicable to smallholder.</p>	
2.9 Safety and health of workers protected	2.9 Safety and health of workers protected	
<p>2.9.1 Levels I, II and III</p> <p>The organisations shall have a worker health and safety program that at minimum assures compliance with legal requirements or with indicators of the Standard as set out below, whichever is more protective.</p> <p>Guidance: Scope and complexity of the program shall be proportional to the scope and complexity of the certified organisation. In the case of smallholders, this responsibility lays with farmer groups, co-operatives or first processors, where applicable.</p>		<p>Deleted from Version 4 (text included as relevant in the next indicator).</p> <p>The exclusion of 2.9.1 and its unification with 2.9.2 is an outcome of Public consultation and internal discussions.</p>
<p>2.9.2 Levels I, II and III</p> <p>CORE - The certified organisation shall conduct a risk assessment of their operation and use the results of that study to guide mitigation of risks and development and implementation of accident and emergency systems and procedures.</p> <p>Guidance: This indicator is not applicable to small holders, or farms with no employees.</p>	<p>2.9.1 Levels I and III</p> <p>CORE- The certified organisation shall conduct a risk assessment of their operation and use the results of that study to guide mitigation of risks and the development of a health and safety program. Additionally, it should support the implementation of accident and emergency systems and procedures.</p> <p>Guidance: This indicator is not applicable to farms with no employees. Scope and complexity of the program shall be proportional to the scope and complexity of the certified organisation. In the case of smallholders, this responsibility lays with farmer groups, cooperatives or first processors, where applicable.</p>	Level II excluded.
2.9.3 Levels I, II and III	<p>2.9.2 Levels I and III</p> <p>CORE - First aid shall be readily and quickly available if and when accidents or other emergencies occur on the worksite.</p>	Level II excluded.

<p>CORE - Medical treatment/first aid shall be readily and quickly available if and when accidents or other emergencies occur on the worksite.</p>		
<p>2.9.4 Levels I, II and III</p> <p>The certified organisation shall monitor and ensure compliance with its worker safety and health program and keep records of health and safety performance, including accident statistics for the operation.</p> <p>Guidance: Accident statistics: accidents per number of hours worked and accidents per employee. This indicator is not applicable to smallholder/family farmers.</p>	<p>2.9.3 Levels I and III</p> <p>The certified organisation shall monitor and ensure compliance with its worker safety and health program and keep records of health and safety performance, including accident statistics for the operation.</p> <p>Guidance: Accident statistics: accidents per number of hours worked and accidents per employee. This indicator is not applicable to smallholder.</p>	Level II excluded.
<p>2.9.5 Levels I, II and III</p> <p>CORE - 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 qualified and properly trained workers. The following types of employees, shall not be permitted to conduct such tasks, including subcontracted workers: Persons under the age of 18 or above the age of 60 - Pregnant or nursing women - Persons with mental illness - Persons with chronic, hepatic, renal, or respiratory diseases - Persons with other health problems or limitations that would make them more vulnerable to hazardous conditions.</p> <p>Guidance: The operation shall maintain documentation identifying employees excluded from these activities and require subcontractors to do the same. The certification body may allow for the minimum/maximum ages to be lower/higher than 18/60 in cases where national legislation and/or other legal permitting procedures are in effect, and provided there are measures in place to adequately protect the health and safety of such workers.</p>	<p>2.9.4 Levels I and III</p> <p>CORE - 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 qualified and properly trained workers. The following types of employees, shall not be permitted to conduct such tasks, including subcontracted workers: Persons under the age of 18 or above the age of 60 - Pregnant or nursing women - Persons with mental illness - Persons with chronic, hepatic, renal, or respiratory diseases - Persons with other health problems or limitations that would make them more vulnerable to hazardous conditions.</p> <p>Guidance: This indicator applies to organization with worker or subcontracted worker. The operation shall maintain documentation identifying employees excluded from these activities and require subcontractors to do the same.</p>	<p>Level II excluded.</p> <p>Text in red and deletion in blue is an outcome of public consultation</p>
2.9.6 Levels I, II and III	2.9.5 Levels I and III	Level II excluded.

Certified organisations shall provide all required personal protective equipment (PPE) and clothing.	CORE - Certified organisations shall provide all required personal protective equipment (PPE) and clothing. Guidance: training on the importance and usage o PPE is to be considered as part of this indicator.	Made CORE as per public consultation outcome. Guidance is an outcome of public consultation.
2.9.7 Levels I, II and III Wearing of appropriate personal protective equipment (PPE) and clothing is mandatory during handling and application of toxic substances or conduct of other hazardous tasks.	2.9.6 Levels I and III Wearing of appropriate personal protective equipment (PPE) and clothing is mandatory during handling and application of toxic substances or conduct of other hazardous tasks.	Level II excluded
2.10 Training in health and safety	2.10 Training in health and safety	
2.10.1 Levels I, II and III CORE - Workers shall be trained in health and safety on the job, and particularly those workers 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. Guidance: In addition to conducting all aspects of their work safely, workers shall handle all pesticide use and disposal in a manner that protects the worker and others in the vicinity as well as the environment. An example of additional measures is the marking of areas where pesticides are stored, handled, or used. In the case of smallholders, training in health and safety should be ensured by groups, co-operatives or first processors.	2.10.1 Levels I and III CORE - Workers shall be trained in health and safety on the job, and particularly those workers 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. Guidance: In addition to conducting all aspects of their work safely, workers shall handle all pesticide use and disposal in a manner that protects the worker and others in the vicinity as well as the environment. An example of additional measures is the marking of areas where pesticides are stored, handled, or used. In the case of smallholders, training in health and safety should be ensured by groups, cooperatives or first processors.	Level II excluded
2.10.2 Levels I, II and III Certified organisations shall maintain records for all health and safety training for a minimum of 5 years, or longer if specified by local regulations. Guidance: The following information shall be included in these records: date, time, attendees, trainer, and content material used during training.	2.10.2 Levels I and III CORE -Certified organisations shall maintain records for all health and safety training for a minimum of 5 years, or longer if specified by local regulations. Guidance: The following information shall be included in these records: date, time, attendees, trainer, and content material used during training.	Level II excluded. Made CORE

<p>2.10.3 Levels I, II and III</p> <p>Certified organisations shall employ qualified personnel to instruct workers in safety and health on the job, and especially in the safe handling, storage, and application of pesticides and other toxic materials and the safe conduct of other hazardous tasks.</p> <p>Guidance: Certified organisations shall ensure that instructors have necessary technical knowledge and legal qualifications. In the case of smallholders, the instruction should be ensured by groups, co-operatives or first processors.</p>	<p>2.10.3 Levels I and III</p> <p>Certified organisations shall employ qualified personnel to instruct workers in safety and health on the job, and especially in the safe handling, storage, and application of pesticides and other toxic materials and the safe conduct of other hazardous tasks.</p> <p>Guidance: Certified organisations shall ensure that instructors have necessary technical knowledge and legal qualifications. In the case of smallholders, the instruction should be ensured by groups, cooperatives or first processors.</p>	Level II excluded.
<p>2.11 Maternity leave</p>	<p>2.11 Parental leave</p>	
<p>2.11.1 Levels I, II and III</p> <p>Certified organisations shall comply at least with national and state regulations regarding maternity leave.</p>	<p>2.11.1 Levels I and III</p> <p>Certified organisations shall comply at least with national and state regulations regarding maternity and paternity leave.</p>	Level II excluded.
<p>2.11.2 Levels I, II and III</p> <p>Workers taking maternity leave have the right to resume their work under the same conditions existing before taking leave, without discrimination, deduction of wages or loss of seniority.</p>	<p>2.11.2 Levels I and III</p> <p>Workers taking maternity/paternity leave have the right to resume their work under the same conditions existing before taking leave, without discrimination, deduction of wages or loss of seniority.</p>	Level II excluded.
<p>2.11.3 Levels I, II and III</p> <p>In locations where specific regulations do not cover the topics, certified organisations shall establish reasonable maternity leave, and leave for health treatment.</p>	<p>2.11.3 Levels I and III</p> <p>CORE - In locations where specific regulations do not cover maternity leave, certified organisations shall establish a reasonable leave period.</p> <p>Guidance: This indicator is not applicable to smallholders.</p>	Level II excluded. Made Core as per public consultation outcome.
<p>2.12 Freedom for workers to organize and form associations.</p>	<p>2.12 Freedom for workers to organize, join and form associations</p>	
<p>2.12.1 Levels I, II and III</p>	<p>2.12.1 Levels I and III</p>	Level II excluded.

<p>CORE - All workers, contracted and share-croppers shall be allowed to form and join trade unions or other collective bargaining organisations of their choice.</p> <p>Guidance: Certified organisations must provide evidence demonstrating that the certified organisation respects the rights of all personnel to form and join trade unions or other collective bargaining organisations in accordance with the law. This indicator is not applicable to smallholder/family farmers.</p>	<p>CORE - All workers, contracted and share-croppers shall be allowed to form and join trade unions or other collective bargaining organisations of their choice.</p> <p>Guidance: Certified organisations must provide evidence demonstrating that the certified organisation respects the rights of all personnel to form and join trade unions or other collective bargaining organisations in accordance with the law. This indicator is not applicable to smallholder.</p>	
<p>2.12.2 Levels I, II and III</p> <p>Certified organisations shall not impede functions of collective bargaining organisations and representatives of collective bargaining organisations shall have access to their members at the workplace.</p>	<p>2.12.2 Levels I and III</p> <p>CORE - Certified organisations shall not impede functions of collective bargaining organisations and representatives of collective bargaining organisations shall have access to their members at the workplace.</p>	<p>Level II excluded. Made CORE</p>
<p>2.12.3 Levels I, II and III</p> <p>There shall be no discrimination by management or workers between unrepresented workers and members of labour or trade unions.</p>	<p>2.12.3 Levels I and III</p> <p>CORE - There shall be no discrimination by management or workers between unrepresented workers and members of labour or trade unions.</p>	<p>Level II excluded. Made CORE</p>
Principle 3 – Responsible relations with workers and community	Principle 3 – Responsible relations with workers and community	
3.1 Systems of communication	3.1 Systems of communication and grievance mechanism	
<p>3.1.1 Levels I, II and III</p> <p>CORE - Certified organisations shall establish and document an effective and timely system of communication with all workers and with the local communities, and an effective and timely system to receive, investigate and respond to all complaints from these parties.</p> <p>Guidance: This system shall function at the worksites and in the communities linked to certified organisations. This indicator is not applicable to smallholder/family farmers.</p>	<p>3.1.1 Levels I and III</p> <p>CORE - Certified organisations shall establish and document an effective and timely system of communication with all workers and with the local communities, and an effective and timely system to receive, investigate and respond to all complaints from these parties.</p> <p>Guidance: This system shall function at the worksites and in the communities linked to certified organisations. This indicator is not applicable to smallholder.</p>	<p>Level II excluded.</p>
3.1.2 Levels I, II and III	3.1.2 Levels I and III	<p>Level II excluded.</p>

Complaints, responsive actions, and outcomes shall be documented and records maintained for 5 years or more if required by local law. Guidance: Auditor will look into the number of complaint resolution processes and verify the number of effective resolutions achieved. This indicator is not applicable to smallholder/family farmers.	Complaints, responsive actions, and outcomes shall be documented and records maintained for 5 years or more if required by local law. Guidance: Auditor will look into the number of complaint resolution processes and verify the number of effective resolutions achieved. This indicator is not applicable to smallholder.	
3.1.3 Levels I, II and III The system shall include a mechanism that allows workers and community members to lodge complaints in a manner anonymous to the management of the certified organisation (if they desire anonymity), yet also allows verification of the validity of the complaints. The certified organisation should also recognize the competence of local labour tribunals, if these are the mechanism chosen by workers for raising grievances. Guidance: One example of such a system would be to appoint an independent ombudsman who receives complaints, assesses validity and sets in motion appropriate processes for correction/redress. The procedures for electing/appointing the ombudsman must be transparent and must equitably include workers, community members or their representatives in the appointment process. This indicator is not applicable to smallholder/family farmers.	3.1.3 Levels I and III The system shall include a mechanism that allows workers and community members to lodge complaints in a manner anonymous to the management of the certified organisation (if they desire anonymity), yet also allows verification of the validity of the complaints. The certified organisation should also recognize the competence of local labour tribunals, if these are the mechanism chosen by workers for raising grievances. Guidance: One example of such a system would be to appoint an independent ombudsman who receives complaints, assesses validity and sets in motion appropriate processes for correction/redress. The procedures for electing/appointing the ombudsman must be transparent and must equitably include workers, community members or their representatives in the appointment process. This indicator is not applicable to smallholder.	Level II excluded.
3.2 Land use does not impair the rights of traditional other users	3.2 Land use does not impair the rights of traditional other users	No modification
3.2.1 Levels I, II (transport excluded) and III Land use in all cases shall not interfere with the agricultural production systems of neighbours, so as to allow coexistence of different production systems.	3.2.1 Levels I and III CORE - Land use in all cases shall not interfere with the agricultural production systems of neighbours, so as to allow coexistence of different production systems.	Level II excluded. Made CORE
3.2.2 Levels I, II (transport excluded) and III CORE - Land rights disputes shall be resolved before certified status can be awarded.	3.2.2 Levels I and III Land rights disputes shall be resolved before certified status can be awarded. The UN Principle of free, prior and informed consent (FPIC) shall apply to this indicator.	Level II excluded Guidance on FPIC added as per agreements with Swiss soy network. FPIC is

		also an outcome of public consultation.
3.3 Supporting local economy	3.3 Economic development and support to local economy	
3.3.1 Levels I, II and III Certified organisations shall demonstrate support for local community development projects. Guidance: This indicator is not applicable to smallholder/family farmers.	3.3.1 Levels I and III Certified organisations shall demonstrate support for local community development projects. Guidance: This indicator is not applicable to smallholder.	Level II excluded.
3.3.2 Levels I, II and III Certified organisations shall contribute to the local economy by preferentially offering local businesses the opportunity to supply goods and services that meet the organisation's specifications.	3.3.2 Levels I and III Certified organisations shall contribute to the local economy by preferentially offering local businesses the opportunity to supply goods and services that meet the organisation's specifications. Guidance: This indicator is not applicable to smallholder.	Level II excluded.
3.3.3 Levels I, II and III Job opportunities shall be made available first to qualified members of the local community.	3.3.3 Levels I and III Job opportunities shall be made available first to qualified members of the local community. Guidance: This indicator is not applicable to smallholder.	Level II excluded.
	3.3.4 Levels I and III Certified organizations shall have a financial planning of its business to ensure its economic feasibility over time. Guidance: Smallholder are expected to at least be able to verbally explain the way the farms finance is organized and issues that are relevant for economic feasibility of the family business and actions eventually taken to ensure sustainability over time.	
Principle 4 – Environmental services, effective environmental management plan	Principle 4 – Biodiversity conservation, effective environmental management and environmental services	Title modified
4.1 Land conversion	4.1 Land conversion and forest conservation	
4.1.1 Levels I, II (transport excluded) and III	4.1.1 Levels I and III	Level II excluded.

<p>CORE - For certification under this Standard, areas of native vegetation and other high conservation value areas cannot have been cleared or converted into agricultural areas, or used for industrial or other commercial purposes, after 2004, in particular the following: a) Primary Forests (for instance, rainforests) b) Riparian Vegetation c) Wetlands d) Swamps e) Floodplains f) Steep slopes g) Other high conservation value areas as defined by the HCVA Network.</p> <p>Guidance: An example of a prohibited industrial use of resources would be cutting timber for commercial use or use as fuel for drying grain. This indicator states the requirement regarding land conversion of native vegetation and HCVAs. The cut-off date can be adjusted for specific regions, and can be modified to include compensatory measures for certain limited periods. However, the fundamental Principle of the ProTerra Standard is that conversion of native vegetation and HCVAs is not allowed.</p>	<p>CORE -For certification under this Standard, areas of native vegetation cannot have been cleared or converted into agricultural areas, or used for industrial or other commercial purposes, after 2008, in particular the following: a) Primary Forests (for instance, rainforests); b) Riparian Vegetation; c) Wetlands; d) Swamps; e) Floodplains; f) Steep slopes; g) Other as defined by the HCV Resource Network and h) High above-ground carbon stocks.</p>	<p>High above-ground carbon stocks was added as agreed with Swiss Soy network.</p> <p>Under version 3 of the ProTerra standard, the cut-off date could “be adjusted for specific regions and can be modified to include compensatory measures”. Therefore, the compensatory measures existed to compensate for additional conversion of native vegetation and HCVs that occurred after the cut-off date. In version 4.0 this flexibility is no longer applicable, meaning that from 2008 onwards no land, with native vegetation, can be converted or cleared for agriculture, with no exceptions, reason while compensatory measures are not being considered.</p>
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<p>4.1.2 Levels I, II (transport excluded) and III</p> <p>Certified organisations shall adhere to governmental regulations and international conventions that pose additional limits on conversion of native vegetation to agricultural or other commercial purposes.</p> <p>Guidance: In the case of smallholders, this responsibility lays with farmer groups, co-operatives or first processors.</p>	<p>4.1.2 Levels I and III</p> <p>CORE -Certified organisations shall adhere to governmental regulations and international conventions that pose additional limits on conversion of native vegetation to agricultural or other commercial purposes.</p> <p>Guidance: In the case of smallholders, this responsibility lays with farmer groups, cooperatives or first processors.</p>	<p>Level II excluded. Made CORE</p>
<p>4.1.3 Levels I, II (transport excluded) and III</p> <p>CORE - In certain limited circumstances in specific regions, measures to compensate for HCVAs that have already been cleared between 1994 and 2004 must be used to augment indicator 4.1.1.</p> <p>Guidance: Regarding this indicator, certified organisations that run large agricultural operations, on land converted between 1994 and 2004, mainly industrial agriculture, must have an Environmental and Social Impact Assessment (ESIA), and a corresponding Management Plan used to set out a program of compensatory measures that are relevant to their operation and to the local ecosystem and community. Decisions regarding the need to implement a program of compensatory measures in a given region shall be made by the Certification Body. The CB shall inform the ProTerra Certification Committee about their interpretation and decision. If necessary, the ProTerra Certification Committee will make a final decision on the matter, before implementation. The key outcome shall be that the compensation measures shall, over time, restore the ability of the ecosystem to continue to deliver essential environmental services. Two aspects of the compensatory measures must be considered: i. The type and place of restoration – areas as described in indicator 4.1.1 above should be re-vegetated with native species appropriate to the zone in question, preferably to reproduce as much as possible what was originally destroyed. ii. The percentage of the originally</p>		<p>Excluded from version 4 (please refer to 4.1.4 observation)</p>

<p>cleared area that must be restored – this will depend on local, regional, national, and/or international laws and/or conventions as applicable to the biome in question. For example certified organisations will protect areas that are: (a) designated by law or by the relevant competent authority for nature protection purposes; or (b) designated for the protection of rare, threatened or endangered ecosystems or species recognized by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature. In regional interpretations of the standard, compensation criteria and indicators can be stated as necessary. When it is ascertained that compensatory measures are necessary, that requirement becomes a CORE requirement that must be complied with. Example of a region-specific requirement – Brazil: an evidence of compensatory measures being implemented for situations described in this indicator will be the existence of an Environmental Rural Registration (CAR) for an agricultural operation.</p>		
<p>4.2 Maintenance and maximization of biodiversity</p>	<p>4.2 Maintenance and enrichment of biodiversity</p>	
<p>4.2.1 Levels I, II (transport excluded) and III Certified organisations shall maintain or restore areas of natural vegetation around bodies of water and on steep slopes and hills, and other sensitive parts of the ecosystem. Guidance: The width or area of vegetation shall be sufficient to maintain and foster the continued survival of the natural biodiversity of the area and to avoid erosion.</p>	<p>4.2.1 Levels I and III CORE - Certified organisations shall identify and maintain valuable biodiversity within farm areas and shall, with the involvement of external expert, restore areas of natural vegetation around bodies of water and on steep slopes and hills, and other sensitive parts of the ecosystem. Guidance: The width or area of vegetation shall be sufficient to maintain and foster the continued survival of the natural biodiversity of the area and to avoid erosion. To the extent possible, large agricultural developments (industrial level), shall support and stimulate the identification and maintenance of valuable biodiversity outside its farmed areas.</p>	<p>Level II excluded. Made CORE as per Stakeholder consultation outcome and as per agreement with Swiss Soy Network.</p>

<p>4.2.2 Level I</p> <p>Certified organisations shall gather wild species or products from their natural habitat only when permitted by law and shall do so only in a manner that assures those species will continue to flourish in their natural habitat along with other species that normally depend on the gathered species.</p>	<p>4.2.2 Level I</p> <p>Certified organisations shall gather wild species or products from their natural habitat only when permitted by law and shall do so only in a manner that assures those species will continue to flourish in their natural habitat along with other species that normally depend on the gathered species.</p>	No modification
<p>4.2.3 Levels I and III</p> <p>The introduction of invasive species and new pests shall be avoided, and past introductions must be controlled and monitored, and any invasive expansion of these shall be reported to the authorities.</p>	<p>4.2.3 Levels I</p> <p>CORE -The introduction of invasive species and new pests shall be avoided, and past introductions must be controlled and monitored, and any invasive expansion of these shall be reported to the authorities.</p>	Level III excluded. Made CORE.
<p>4.3 Social and environmental impact assessment and management plan</p>	<p>4.3 Social and environmental impact assessment and management plan</p>	
<p>4.3.1 Levels I, II and III</p> <p>Certified organisations shall perform a comprehensive Environmental and Social Impact Assessment (ESIA) for new large or high risk greenfield expansion or projects and infrastructure to identify potentially harmful or damaging impacts and to define a Management Plan to address these where necessary. This plan also shall include actions to maintain and maximize biodiversity within and surrounding the operation, which will be updated yearly.</p> <p>Guidance: This indicator is not applicable to agricultural operations of smallholders. The cut-off date for the need of an ESIA for greenfield expansion, new agricultural areas and new projects will be considered as 2004, respecting the cut-off date for land conversion set on 4.1. The ESIA must be commensurate to the scale of the operation and infrastructure. It must take into account the sustainability of the environment, wildlife and endangered species, and the social impact on the local population including, where relevant, indigenous people. If the organisation does not have</p>	<p>4.3.1 Levels I and III</p> <p>CORE - Certified organisations shall perform a comprehensive Environmental and Social Impact Assessment (ESIA) for any large or high risk greenfield expansion or new infrastructure projects to identify potentially harmful or damaging impacts and to define a Management Plan to address these where necessary. External experts are to be involved.</p> <p>Guidance: This indicator is not applicable to agricultural operations of smallholders. The ESIA must be commensurate to the scale of the operation and infrastructure. It must take into account the sustainability of the environment, wildlife and endangered species, and the social impact on the local population including, where relevant, indigenous people and traditional land users. Guidance from government, academic or other recognized experts should be accessed, as applicable, to complete the ESIA. Where existing, national regulations related to such assessment must be complied with. A definition of ESIA is provided under section III.</p>	<p>Level III excluded.</p> <p>Made CORE.</p> <p>Involvement of external experts is an agreement made with Swiss Soy network.</p> <p>Text in Red is an outcome of public consultation.</p>

expertise in house to effectively conduct the ESIA, guidance from government, academic or other recognized experts shall be accessed. Where these exist, national regulations must be complied with.		
<p>4.3.2 Levels I, II and III</p> <p>Certified organisations shall carry out the Management Plan specified in 4.3.1 and will review and revise it annually prior to the ProTerra audit, including consideration of new projects, assessing progress, revising and setting new objectives, as appropriate.</p> <p>Guidance: ProTerra will audit annually the progress and implementation of the ESIA Management Plan. This plan is expected to become more concrete and comprehensive over time.</p>	<p>4.3.2 Levels I and III</p> <p>Certified organisations that fall within the requirements of 4.3.1 shall carry out the Management Plan specified in that indicator and will review prior to the ProTerra audit, assessing progress, revising and setting new objectives, as appropriate. This plan shall also include actions to maintain and foster biodiversity within and surrounding the operation, which will be monitored regularly and updated as necessary.</p>	Level III excluded.
<p>Principle 5 – Genetically Modified Organisms (GMO) not used</p> <p><i>The applicability of this Principle is determined by assessing risk of GMO presence, contamination or use. Auditor should refer to Appendix A for risk assessment. If risk is non-existent this Principle is non-applicable.</i></p>	<p>Principle 5 – No use of Genetically Modified Organisms (GMO)</p> <p><i>The applicability of this Principle is determined by assessing risk of GMO presence, contamination or use. Auditor should refer to Appendix A for risk assessment. If risk is non-existent this Principle is non-applicable.</i></p>	
5.1 GMOs excluded	5.1 GMOs and Genetically Engineered Organisms are excluded	
<p>5.1.1 Levels I, II and III</p> <p>CORE - Genetically modified organisms (GMO) and their by-products must not be used in the production of ProTerra certified products.</p> <p>Guidance: This indicator applies to seed and other agricultural inputs, as well as ingredients, processing aids, additives, and other inputs used in processing agricultural products and used in manufacturing food, feed, fibre, derived products, and fuel products. Not applicable if there are no genetically modified varieties existing or approved in the country where this Standard is being applied. Where there is GMO risk ProTerra determines that</p>	<p>5.1.1 Levels I, II and III</p> <p>CORE - Genetically modified organisms (GMO) and their by-products must not be used in the production of ProTerra certified products. This includes technology that can be used to edit genes within organisms such as CRISPR/Cas9.</p> <p>Guidance: This indicator applies to seed and other agricultural inputs, as well as ingredients, processing aids, additives, and other inputs used in processing agricultural products and used in manufacturing food, feed, fibre, derived products, and fuel products. Not applicable if there are no genetically modified varieties existing</p>	

certified organisation meets one of the following: (a) organisation is certified to Non-GM production by a standard such as the Cert ID Non-GMO Standard or equivalent to the same, like for example the American Non-GMO Project Standard (US), the German VLOG “ohne Gentechnik” Standard, the Guidelines on the definition of GMO-free production of Food and its labelling according to the Austrian Codex Alimentarius, respecting their scope of applicability, or b) operates an effective control system that deliver equivalent results.	or approved in the country where this Standard is being applied. Where there is GMO risk ProTerra determines that certified organisation meets one of the following: (a) organisation is certified to Non-GM production by a standard such as the FoodChain ID Non-GMO Global Standard or equivalent to the same, like for example the American Non-GMO Project Standard (US), the German VLOG “ohne Gentechnik” Standard, the Guidelines on the definition of GMO-free production of Food and its labelling according to the Austrian Codex Alimentarius, respecting their scope of applicability, or b) operates an effective control system that deliver equivalent results.	
<p>5.1.2 Levels I, II and III</p> <p>CORE - All certified organisations shall avoid the unintentional contamination of certified products by GMO's from external sources and shall demonstrate that the Non-GMO control system is set to assure that products have less than 0.1% of adventitious or unintended GMO contamination.</p> <p>Guidance: Lots of product that meet this specification for unintended adventitious contamination may carry the claim, “ProTerra Certified Non-GMO,” and can also state “less than 0.1% GMO,” if the certified organisation wishes. In cases where a given lot of product exceeds the 0.1% threshold but contains less than 0.9% GMO, that lot can still be accepted under the ProTerra Certification Program, but shall not be allowed to make the “ProTerra Certified Non-GMO” claim. Instead, such lots can be sold with the claim “ProTerra Certified less than X% GMO,” where X% indicates the measured GMO content of the lot based on quantitative GMO testing.</p>	<p>5.1.2 Levels I, II and II</p> <p>CORE - All certified organisations shall avoid the unintentional contamination of certified products by GMO's from external sources and shall demonstrate that the Non-GMO control system is set to assure compliance with non-GMO requirements of their target market(s), which includes defining (1) the Targeted Threshold Tolerance Level—i.e., the level of acceptable GM contamination found in a specified product for a specified region (country)—and (2) approved/ non-approved GMOs.</p> <p>Guidance: Where the Targeted Threshold is not defined, the target level is 0.1% with an adventitious GM presence level of up to 0.9%, of approved GMOs. For claims on products, certified organisations shall refer to the document entitled Guidelines and Requirements for the Use of the ProTerra Logos and Seals.</p>	
<p>5.1.3 Levels I, II and III</p> <p>CORE - Certified organisations may use certain substances, which are produced by GMOs or which are of non-defined genetic origin,</p>	<p>5.1.3 Levels I, II and III</p> <p>CORE - Certified organisations may use certain substances, which are produced by GMOs or which are of non-defined genetic origin,</p>	No modification

<p>if: • The substances are not available on a continuous basis in Non-GMO quality as defined in this standard (based on origin, production process, quantity and analysis); • The substances cannot be replaced with alternative products or methods; • The substances are necessary for animal health and protection reasons; • The substances are necessary for the production of food products; or • The substances' use in food or animal feed is required by law or by regulation in the country or region where they are produced and/ or consumed.</p> <p>Guidance: Such exemptions shall be limited to a minimum and a time limit shall be imposed, if necessary. Substances that are exempted according to this guideline include food additives, processing aids, flavours, amino acids, other micronutrients, vitamins, animal feed additives. Exemptions are only possible, according to the Recommendations of the Expert Group to the Austrian "platform gmofree" or to the recommendations of the EU Commission based on the labelling of organic food.</p>	<p>if: • The substances are not available on a continuous basis in Non-GMO quality as defined in this standard (based on origin, production process, quantity and analysis); • The substances cannot be replaced with alternative products or methods; • The substances are necessary for animal health and protection reasons; • The substances are necessary for the production of food products; or • The substances' use in food or animal feed is required by law or by regulation in the country or region where they are produced and/ or consumed.</p> <p>Guidance: Such exemptions shall be limited to a minimum and a time limit shall be imposed, if necessary. Substances that are exempted according to this guideline include food additives, processing aids, flavours, amino acids, other micronutrients, vitamins, animal feed additives. Exemptions are only possible, according to the Recommendations of the Expert Group to the Austrian "platform gmofree" or to the recommendations of the EU Commission based on the labelling of organic food.</p>	
5.2 System of Identity Preservation and segregation	5.2 System of Identity Preservation and segregation	
<p>5.2.1 Levels I, II and III</p> <p>Certified organisations shall have in place an adequate system of segregation for GMO materials, achieved by one of the following methods: • Use of dedicated sites, facilities, equipment, conveyances, handling equipment and/or related infrastructure. • By inspecting and/or cleaning and/or flushing facilities, equipment and conveyances between use in contact with genetically modified material and Non-GMO material. • A combination of the above methods.</p>	<p>5.2.1 Levels I, II and III</p> <p>Certified organisations shall have in place an adequate system of segregation for GMO materials, achieved by one of the following methods: • Use of dedicated sites, facilities, equipment, conveyances, handling equipment and/or related infrastructure. • By inspecting and/or cleaning and/or flushing facilities, equipment and conveyances between use in contact with genetically modified material and Non-GMO material. • A combination of the above methods.</p>	No modification
<p>5.2.2 Levels I, II and III</p> <p>Certified organisations shall have at least the following procedures and records to provide evidences that segregation is maintained: • Sampling plan for immunologically based screening using strip tests;</p>	<p>5.2.2 Levels I, II and III</p> <p>Certified organisations shall have at least the following procedures and records to provide evidences that segregation is maintained: • Sampling plan for immunologically based screening using strip tests;</p>	No modification

<ul style="list-style-type: none"> • Sampling plan for PCR analyses; • Strip test procedure; • Strip test records; • PCR analysis reports; • Records of flushing or cleaning for product change in nondedicated sites; • Inspection checklist of trucks and other conveyances. <p>Guidance: Applicability of the above evidences should be proportionate to the type and size of the operation. For example, at farm level in general, one may need only a sampling plan, strip test procedures and records. At country elevators and industrial plants, in addition one will need PCR sampling and testing protocol and results linked to production periods and lots. Auditor will decide what the level of compliance is.</p>	<ul style="list-style-type: none"> • Sampling plan for PCR analyses; • Strip test procedure; • Strip test records; • PCR analysis reports; • Records of flushing or cleaning for product change in nondedicated sites; • Inspection checklist of trucks and other conveyances. <p>Guidance: Applicability of the above evidences should be proportionate to the type and size of the operation. For example, at farm level in general, one may need only a sampling plan, strip test procedures and records. At country elevators and industrial plants, in addition one will need PCR sampling and testing protocol and results linked to production periods and lots. Auditor will decide what the level of compliance is.</p>	
Principle 6 – Pollution and waste managed effectively	Principle 6 – Pollution and waste management	This principle has suffered relevant modifications and there is not necessarily an equivalence between indicators from version 3.0 and 4.0
6.1 Reduction and appropriate disposal of non-biological wastes	6.1 - Appropriate management of hazardous wastes and pollutant materials	
6.1.1 Levels I, II and III CORE - Certified organisations shall minimize the use of waste materials and pollutants and shall handle, store and dispose of these materials properly. Management of these wastes shall at least comply with national laws relevant to the location of the certified operation, as stated in Principle 1 of this standard. Guidance: These waste materials include but are not limited to pesticides, fertilizers, processing aids, cleaning products, detergents, and oil derivatives.		
6.1.2 Levels I, II and III		

Non-biological wastes shall be segregated and, where appropriate, recycled. If recycling is not possible, a legal means of disposal or a legal alternative use shall be employed.		
	<p>6.1.1 Levels I and III</p> <p>CORE -Certified organisations shall segregate, handle, store and dispose of hazardous wastes properly. Management of hazardous wastes shall at least comply with national laws relevant to the location of the certified operation, as stated in Principle 1 of this Standard.</p> <p>Guidance: Hazardous wastes include but are not limited to batteries, fluorescent lamps, tires, used lubricant oil. For pesticides residues refer to indicators 9.7.8.</p>	
	<p>6.1.2 Levels I and III</p> <p>CORE - Certified organisations shall handle, store and dispose of pollutant materials properly, having appropriate facilities to prevent spills. Management of pollutant materials shall at least comply with national laws relevant to the location of the certified operation, as stated in Principle 1 of this Standard.</p> <p>Guidance: 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.</p>	
REFER to 6.2.4 in V3	<p>6.1.3 CORE Levels I and II</p> <p>Certified organisations shall discharge sewage /effluents in a manner that does not cause pollution to water and does not contaminate the soil or crops with chemicals, heavy metals, by-products, excess nutrients or pathogens. Raw sewage shall not be used to irrigate crops.</p>	Made Core

	<p>Guidance: If sewage is to be used or otherwise incorporated back into any production system, it must be treated to assure that liquid that is released back into the environment is safe.</p> <p>For certified organizations of Level III, all effluents must be treated and verified by testing to comply with legal requirements.</p>	
6.2 Appropriate disposal of biological wastes	6.2 – Management and appropriate disposal of non-hazardous wastes	
	<p>6.2.1 Levels I and III</p> <p>CORE- Non-hazardous wastes shall be segregated and, where appropriate, recycled or reused. If recycling or reuse is not possible, a legal means of treatment and final disposal shall be employed.</p>	
<p>6.2.1 Levels I, II and III</p> <p>CORE - Certified organisations shall manage biological wastes (e.g., manure, straw, harvest plant residues, and processing by-products thereof) appropriately to avoid pollution and/or to prevent these from becoming a source of pathogenic contamination or pest harbourage. Management of these wastes shall at least comply with national laws relevant to the location of the certified operation, as stated in Principle 1 of this standard.</p>	<p>6.2.2 Levels I and III</p> <p>CORE- Certified organisations shall manage biological wastes such as manure, straw, crop residues, food scraps, processing by-products, among others, appropriately in order to avoid pollution and/or to prevent these from becoming a source of pathogenic contamination or pest harbourage. Management of these wastes shall at least comply with national laws relevant to the location of the certified operation, as stated in Principle 1 of this standard.</p>	Level II excluded
<p>6.2.2 Levels I, II and III</p> <p>Biological wastes shall not be incinerated, except when required for phytosanitary purposes, or in some cases when burned for energy or heating, or used for biogas/oil production.</p> <p>Guidance: Burning or generation of biofuels for energy production, when legal, shall be practiced only in cases where sufficient biomass can also be recycled to the fields by composting or other methods for effectively building healthy soil.</p>	Refer to 6.2.4 in V4	
<p>6.2.3 Levels I, II and III</p> <p>In cases where biological wastes are returned to the agricultural fields as either mulch or compost to build soil organic matter, or as</p>	<p>6.2.3 Levels I and III</p> <p>In cases where residues are returned to the agricultural fields as either mulch or compost to build soil organic matter, or as fertilizer,</p>	

fertilizer, these materials must be treated, where applicable, to assure the absence of chemical or biological contaminants.	these materials must be treated, where applicable, to assure the absence of chemical or biological contaminants. Guidance: When using raw manure as fertilizer, composting is recommended before application to fields.	
Refer to 6.2.2 in V3	6.2.4 Levels I and III CORE -Wastes shall not be incinerated or burned, except when required for phytosanitary purposes, or in cases when it is burned for energy or heating, or used for biogas/oil production. Guidance: Burning for generation of biofuels, for energy production or for heating is only acceptable if legally authorized if regulation determine authorization.	Made CORE as per public consultation (note under version 3.0 it was equivalent to 6.2.2)
6.2.4 Levels I, II and III Certified organisations shall discharge sewage water/effluents in a manner that does not cause pollution to water supplies for human beings or animals , and does not contaminate the soil or crops with chemicals, heavy metals, by-products, excess nutrients or pathogens. Raw sewage shall not be used to irrigate crops. Guidance: If sewage is to be used or otherwise incorporated back into any production system, it must be treated and filtered , to assure that water that is released back into the environment is safe. Effluent water must be verified by test to comply with requirement 6.2.3 , and at least meets legal requirements regarding presence of contaminants. Use of raw manure as fertilizer is suboptimal; composting is recommended before application to fields. However, if used, application should be compliant with the law and should not contaminate the soil or crops with chemicals, medicines (such as antibiotics), heavy metals, by-products, excess nutrients or pathogens.	Refer to 6.1.3 in V4	
6.2.5 Level III		Deleted from version 4.0.

<p>Certified organisations shall monitor physical, chemical and biological characteristics of water discharged into the environment to ensure safety and legal compliance.</p> <p>Guidance: COD or BOD and also N and P concentrations must not exceed local environmental regulations.</p>		It is indirectly considered under 6.1.3
6.3 Control of water contamination		Removed from V4
<p>6.3.1 Level I</p> <p>CORE - Water, soil, pests, fertilization and irrigation shall be managed such that surface and groundwater and other water supplies are not further contaminated.</p> <p>Guidance: Testing shall be done to assure that contamination does not occur. Groundwater is already contaminated with fertilizer and pesticide residues in many countries where industrial agriculture is predominant. The certified organisation is expected to manage their operation in a manner that does not further exacerbate the situation.</p>		<p>Deleted from version 4.0.</p> <p>It is indirectly considered under 6.1.3 and in Principle 4</p>
6.4 Control of atmospheric pollution	6.3 Control of atmospheric pollution	
<p>6.4.1 Levels II and III</p> <p>CORE - Certified organisations shall implement systems and procedures to ensure that concentrations of contaminants emitted through smoke pipes, chimneys, boilers, ovens, incinerators, and electricity generators do not exceed established limits set by local, national or regional law, or by individual authorizations delivered by competent national, regional or local authorities.</p> <p>Guidance: Certified organisations shall document the performance of these control systems.</p>	<p>6.3.1 Levels III</p> <p>CORE - Certified organisations shall implement systems and procedures to ensure that concentrations of contaminants emitted through smoke pipes, chimneys, boilers, ovens, incinerators, and electricity generators do not exceed established limits set by local, national or regional law, or by individual authorizations delivered by competent national, regional or local authorities.</p> <p>Guidance: Certified organisations shall document the performance of these control systems.</p>	Level II excluded
Principle 7 – Water managed conservatively	Principle 7 – Water management	
7.1 Conservation of natural water resources	7.1 Conservation of natural water resources	
7.1.1 Levels I, II (except transport) and III	7.1.1 Levels I, II and III	

CORE - Certified organisations shall conserve quantity and quality of existing natural water resources, such as lakes, rivers, artificial lakes, dams, water tables and aquifers around their facilities.	CORE - Certified organisations shall conserve quantity and quality of existing natural water resources, such as lakes, rivers, artificial lakes, dams, water tables and aquifers around their facilities.	
<p>7.1.2 Levels I and III</p> <p>Certified organisations shall not undertake new initiatives that reduce the availability of water for neighbouring communities and farms for drinking and irrigation, or for “traditional” uses.</p> <p>Guidance: “Traditional” uses of water by certified organisations must likewise be shown to still be viable and sustainable. Practices that once were considered sustainable may no longer be due to increased population pressure or other recent ecosystem or climatic changes.</p>	<p>7.1.2 CORE Levels I and III</p> <p>Certified organisations shall not undertake new initiatives that reduce the availability of water for neighbouring communities and farms for drinking and irrigation, or for “traditional” uses.</p> <p>Guidance: “Traditional” uses of water by certified organisations must likewise be shown to still be viable and sustainable. Practices that once were considered sustainable may no longer be due to increased population pressure or other recent ecosystem or climatic changes.</p>	Made Core as outcome of Stakeholder consultation
<p>7.1.3 Levels I and III</p> <p>In cases where activities that predate the certification application damage water resources, certified organisations shall undertake improvements in practices according to an agreed time frame that will rectify such interference.</p>	<p>7.1.3 Levels I and III</p> <p>In cases where activities carried out prior to the certification application have damaged water resources, certified organisations shall undertake mitigation actions based on a plan agreed with the local environmental authority. This indicator is not applicable to smallholders.</p>	.
7.2 Best practices for water management	7.2 Best practices for water management	No modification
<p>7.2.1 Level I</p> <p>Certified organisations shall implement best practices for water management on the farm and for irrigation.</p>	<p>7.2.1 Level I</p> <p>CORE- Certified organisations shall implement best practices for water conservation and avoidance of contamination of surface and groundwater. If irrigating, salinization and desertification shall be prevented.</p>	Made CORE
	<p>7.2.2 -Level I and III</p> <p>CORE - Any evidence of contamination of ground or surface water shall be reported to the local environmental authority and mitigated based on a plan agreed with such authority.</p>	

7.2.2 Levels I and III Certified organisations shall implement recycling systems and strategies to promote aquifer and water table recharge according to an agreed timeline.		REMOVED From version 4.0 (see 7.2.1)
7.2.3 Level I Irrigation shall be managed so as to avoid contamination, salinization and desertification of the soil.		REMOVED From version 4.0 (see 7.2.1)
Principle 8 – Greenhouse gases and energy managed effectively	Principle 8 – Greenhouse gases and energy management	
8.1 Management of greenhouse gas emissions	8.1 Management of greenhouse gas emissions	
8.1.1 Levels I and III CORE - Certified organisations shall monitor and reduce greenhouse gas emissions such as carbon dioxide, methane, nitrogen and sulphur oxides, etc., and observe restrictions and limits in order to minimize climate change impacts. Guidance: This is achieved through effective management of energy, soil, fertilizers, native biodiversity and other practices. This indicator is not applicable to smallholders/family farms.	8.1.1 Levels I and III Certified organisations should develop an inventory of its greenhouse gas emissions and develop a programme to reduce or compensate emissions. Guidance: For Level I, this indicator is only applicable to industrial large scale agriculture. Certified organizations are stimulated to voluntarily make their GHG information public.	Guidance on voluntarily disclosure of GHG information is an outcome of stakeholder consultation.
8.1.2 Levels I, II (except transport) and III If products are used that are classified as destructive to the ozone layer, a schedule for their elimination and replacement, as described by the Montreal Protocol, shall be followed, or if more stringent national laws exist, those should be followed. Guidance: Examples of such products are Chlorofluorocarbons (CFCs), halons, Hydrochlorofluorocarbons (HCFCs) and Hydrobromofluorocarbons (HBFCs). This indicator is not applicable to smallholders/family farms.		REMOVED From version 4.0 – obsolete topic
8.2 Management of energy use	8.2 Management of energy use	No modification
8.2.1 Levels I, II and III Over time, certified organisations shall adopt practices to minimize the use of energy, especially energy from non-renewable sources	8.2.1 Levels I and III CORE - Over time, certified organisations shall adopt practices to minimize the use of energy from non-renewable sources and to	Level II excluded. Made CORE

<p>and to derive an increasing proportion of their energy from renewable sources such as solar and wind, or from local, recycled materials.</p> <p>Guidance: Examples of applicable materials are reforestation wood, bio-fuels, wood chips, and crop residues or food processing waste, such as sugarcane fibre. Plans should identify timelines, methods, and proposed budgeting of time and company resources needed. Progress shall be documented or otherwise demonstrable. In the case of smallholders, the responsibility lays with farmer groups, co-operatives or first processors.</p>	<p>derive an increasing proportion of their energy from renewable sources such as solar and wind, or from local, recycled materials.</p> <p>Guidance: Examples of applicable materials are reforestation wood, bio-fuels, wood chips, and crop residues or food processing waste, such as sugarcane fibre. Plans should identify timelines, methods, and proposed budgeting of time and company resources needed. Progress shall be documented or otherwise demonstrable. In the case of smallholders, the responsibility lays with farmer groups, cooperatives or first processors.</p>	
Principle 9 – Good agricultural practices adopted	Principle 9 – Adoption of good agricultural practices	
9.1 Systems of best practices	9.1 Systems of good practices	
<p>9.1.1 Level I</p> <p>CORE - Growers shall adopt agricultural best practices and, where possible, adopt conservation systems such as Integrated Pest Management (IPM) and organic agricultural practices.</p> <p>Guidance: Best practices include methods that build soil, protect water, reduce chemical usage, and foster biodiversity.</p>	<p>9.1.1 Level I</p> <p>CORE - Growers shall adopt agricultural best practices and, where possible, adopt conservation systems such as Integrated Pest Management (IPM) and organic agricultural practices.</p> <p>Guidance: Best practices include methods that build soil, protect water, reduce chemical usage, and foster biodiversity.</p>	
9.2 Control of burning	9.2 Control of burning	No modification
<p>9.2.1 Level I</p> <p>Certified organisations shall not clear areas for cultivation by burning vegetation, unless this practice is allowed by local and national law, and then only if this method is prescribed by experts as the optimal ecological option.</p> <p>Guidance: Such recommendations shall be documented.</p>	<p>9.2.1 Level I</p> <p>CORE Certified organisations shall not clear areas for cultivation by burning vegetation, or burn sugarcane for harvesting purposes, e.g sugarcane, unless this practice is allowed by local and national law.</p> <p>Guidance: If allowed by local and national law, burning must be adequately documented. In these cases, workers shall be trained for this activity. Training records shall be available.</p>	Made CORE as per Public Consultation outcome
<p>9.2.2 Level I</p> <p>If experts recommend fire as the most appropriate option for clearing an area, then trained people shall apply the technical procedure and employ all required safety and environmental measures.</p>		REMOVED From version 4.0 (see 9.2.1 above)

<p>Guidance: Terms for qualifications of trained people shall be described by the certified operation.</p>		
<p>9.2.3 Level I</p> <p>Although burning may be recommended for a specific current application, certified organisations shall develop alternative methods for use in future years.</p> <p>Guidance: The development of alternative practices should commence within the year that burning is employed, and should be completed on a timeline, defined in consultation with the certification body.</p>	<p>9.2.2 Level I</p> <p>Should burning vegetation be practiced by an organization in accordance with aspects of indicators 9.2.1, certified organisations shall develop alternative methods for future use.</p>	
9.3 Soil and crop management	9.3 Soil and crop management	
<p>9.3.1 Level I</p> <p>Certified organisations shall define a soil and crop management regime that monitors soil quality, builds soil, enhances fertility and manages pests and diseases.</p> <p>Guidance: Examples of useful practices include use of cover crops, management of vegetation, management of crop succession and rotation.</p>	<p>9.3.1 Level I</p> <p>CORE -Certified organisations shall define a soil and crop management regime that monitors soil quality, builds soil, enhances fertility and manages pests and diseases.</p> <p>Guidance: Examples of useful practices include use of cover crops, management of vegetation, management of crop succession and rotation.</p>	Made Core as per public consultation
<p>9.3.2 Level I</p> <p>Certified organisations shall evaluate suitability of the soil for production of specific crops and to define a soil management regime.</p> <p>Guidance: Expert advice on soil science can be accessed outside the organisation if not available on site and soil analysis can be a useful tool for this evaluation.</p>	<p>9.3.2 Level I</p> <p>CORE - Certified organisations shall evaluate suitability of the soil for production of specific crops and to define a soil management regime.</p>	Made Core
<p>9.3.3 Level I</p> <p>Best practices are followed in fertilizer use, based on expert opinion or at least the manufacture's recommendations. Whenever possible producers should reduce the use of chemical fertilizer to the optimal minimum level.</p>	<p>9.3.3 Level I</p> <p>Best practices are followed in fertiliser use, based on expert opinion or at least the manufacture's recommendations. Whenever possible producers should reduce the use of chemical fertilizer.</p>	No modification

<p>9.3.4 Level I</p> <p>Certified organisations shall minimize soil erosion and damage to soil structure caused by wind, water, human activity and presence of farm animals.</p> <p>Guidance: Production practices should maintain vegetative cover for as long as possible throughout the year.</p>	<p>9.3.4 Level I</p> <p>CORE - Certified organisations shall minimize soil erosion and damage to soil structure caused by wind, water, human activity and presence of farm animals.</p> <p>Guidance: Production practices should maintain vegetative cover for as long as possible throughout the year. Techniques such as deep-rooting green crops; mulching; use low pressure tires, for example, should be considered.</p>	<p>Made CORE</p> <p>Text in green as per agreement with Swiss Soy Network</p>
9.4 Documentation of agricultural production	9.4 Documentation of agricultural production	
<p>9.4.1 Level I</p> <p>All records referred to in the following indicators should be kept for 5 years or longer if required by local regulations.</p> <p>Guidance: If this indicator is first being met during the initial year that ProTerra certification is achieved, and local regulations do not prescribe, the certification body will waive the retroactive aspect of it for the initial years of certification. This indicator is not applicable to smallholders/family farms.</p>	<p>9.4.1 Level I</p> <p>CORE - All records referred to in the following indicators should be kept for 5 years or longer if required by local regulations.</p> <p>Guidance: If this indicator is first being met during the initial year that ProTerra certification is achieved, and local regulations do not prescribe, the certification body will waive the retroactive aspect of it for the initial years of certification. This indicator is not applicable to smallholders.</p>	Made Core
<p>9.4.2 Level I</p> <p>Certified organisations shall maintain all seed records.</p> <p>Guidance: Records include: a) Invoices of purchase of seeds - If the seed invoice does not include the following: supplier's name, date of purchase, variety and/or brand name, quantity and lot number, then this information shall be recorded independent of the invoice; b) Seed certificates and seed bag labels; c) Records of seeds produced by the farm; d) Each season's records identifying the seeds and their source used for planting each crop.</p>	<p>9.4.2 Level I</p> <p>Certified organisations shall maintain all seed records.</p> <p>Guidance: Records include: a) Invoices of purchase of seeds - If the seed invoice does not include the following: supplier's name, date of purchase, variety and/or brand name, quantity and lot number, then this information shall be recorded independent of the invoice; b) Seed certificates and seed bag labels; c) Records of seeds produced by the farm; d) Each season's records identifying the seeds and their source used for planting each crop.</p>	No modification
<p>9.4.3 Level I</p> <p>Certified organisations shall maintain records of all agricultural production.</p>	<p>9.4.3 Level I</p> <p>Certified organisations shall maintain records of all agricultural production.</p>	No modification

<p>Guidance: Records typically are harvest records, including: a) crop succession and rotation for each field; b) crop weight; c) yield; d) identification of the field from which the crop was harvested; e) seed lots and variety used; f) harvest date; g) pest and diseases; h) other soil and crops information and management practices.</p>	<p>Guidance: Records typically are harvest records, including: a) crop succession and rotation for each field; b) crop weight; c) yield; d) identification of the field from which the crop was harvested; e) seed lots and variety used; f) harvest date; g) pest and diseases; h) other soil and crops information and management practices.</p>	
<p>9.4.4 Level I Certified organisations shall maintain records of all fertilizer, pesticides, other agrochemicals and other inputs purchased, used, and disposed of, including biocontrol agents. Records of pests, diseases, weather conditions during spraying, and weeds shall also be recorded.</p> <p>Guidance: Records typically include: a) Fertilizer and pesticide applications; b) Purchase Invoices of all inputs used in agricultural production; c) Application procedures; d) Dilution dosages and amounts used; e) Crops and field locations to which they were applied; f) Dates of application; g) Relevant quarantine times before the crop was harvested; h) Weather conditions during application.</p>	<p>9.4.4 Level I CORE - Certified organisations shall maintain records of all fertilizer, pesticides, other agrochemicals and other inputs purchased, used, and disposed of, including biocontrol agents. Records of pests, diseases, weather conditions during spraying, and weeds shall also be recorded.</p> <p>Guidance: This is not applicable to smallholders- Records typically include: a) Fertilizer and pesticide applications; b) Purchase Invoices of all inputs used in agricultural production; c) Application procedures; d) Dilution dosages and amounts used; e) Crops and field locations to which they were applied; f) Dates of application; g) Relevant quarantine times before the crop was harvested; h) Weather conditions during application.</p>	<p>Made CORE</p>
<p>9.5 Management of propagation material</p>	<p>9.5 Management of propagation material</p>	
<p>9.5.1 Level I Seeds, seedlings, and propagation materials shall be selected for quality and performance for the locale.</p> <p>Guidance: Evidence for this indicator may consist of seed germination and vigour test reports. Such evidence may come from suppliers or technical assistance organisations and extension services. The certification body may waive this indicator in cases where producers save their own seed or propagate from their own existing stocks, especially in the case of smallholders.</p>	<p>9.5.1 Level I Seeds, seedlings, and propagation materials shall be selected for quality and performance for the locale.</p> <p>Guidance: Evidence for this indicator may consist of seed germination and vigour test reports. Such evidence may come from suppliers or technical assistance organisations and extension services. The certification body may waive this indicator in cases where producers save their own seed or propagate from their own existing stocks, especially in the case of smallholders. Smallholders may report verbally on their own propagation materials.</p>	

<p>9.5.2 Level I</p> <p>When seeds are saved and/or obtained by breeding locally, the certified organisation must conduct practices to assure seed quality and performance.</p> <p>Guidance: Evidence of this indicator may be yield records from the past crop from those seeds and/or germination/vigour test records.</p>	<p>9.5.2 Level I</p> <p>When seeds are saved and/or obtained by breeding locally, the certified organisation must conduct practices to assure seed quality and performance.</p> <p>Guidance: Evidence of this indicator may be yield records from the past crop from those seeds and/or germination/vigour test records.</p>	No modification
<p>9.5.3 Level I</p> <p>Certified organisations shall retain archive seed samples for a minimum of 1 year.</p> <p>Guidance: The certified organisation must begin archiving seed during the first year of certification. In cases, where due to conservation conditions seeds deteriorate, as in smallholder operations, this indicator shall be non-applicable.</p>	<p>9.5.3 Level I</p> <p>Certified organisations shall retain archive seed samples for a minimum of 1 year.</p> <p>Guidance: The certified organisation must begin archiving seed during the first year of certification. In cases, where seeds deteriorate due to conservation conditions, this indicator shall be non-applicable.</p>	
9.6 Reduction of toxic and polluting materials	9.6 Reduction of toxic and polluting materials	
<p>9.6.1 Level I</p> <p>CORE - Growers 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.</p> <p>Guidance: Operations that use agrochemicals for pests, diseases, and non-crop plants shall employ Integrated Pest Management (IPM) and other strategies, like use of ecologically sound biological controls for the target pests or disease where applicable, to minimize agrochemical use.</p>	<p>9.6.1 Level I</p> <p>CORE - Growers 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.</p> <p>Guidance: Operations that use agrochemicals for pests, diseases, and non-crop plants shall employ Integrated Pest Management (IPM) and other strategies, like use of ecologically sound biological controls for the target pests or disease where applicable, to minimize agrochemical use.</p>	No modification
<p>9.6.2 Levels I, II and II</p> <p>CORE - Pesticides listed in the WHO classes Ia, Ib and II lists, Rotterdam Convention, Stockholm Convention, and PAN international list of highly hazardous pesticides, as well as pesticides forbidden by local, national, and regional law, may not be used. Hazardous substances listed in the Rotterdam Convention also are not to be used in agricultural or industrial operations.</p>	<p>9.6.2 Levels I, II and II</p> <p>CORE - Pesticides listed in the WHO classes Ia, Ib lists, Rotterdam Convention, Stockholm Convention as well as pesticides forbidden by local, national, and regional law, may not be used. Hazardous substances listed in the Rotterdam Convention also are not to be used in agricultural or industrial operations, the provisions of indicator 9.6.3. being observed.</p>	Removal of Who class II and PAN international list of highly hazardous pesticides

<p>Guidance: Lists of all chemicals referenced in this indicator may be found on the websites listed in Appendix C of this Standard.</p>	<p>Guidance: Lists of all chemicals referenced in this indicator may be found on the websites listed in Appendix C of this Standard.</p>	
<p>9.6.3 Levels I, II and III</p> <p>In cases where chemicals included on the lists cited in 9.6.2 can be used legally in the country where agricultural production is conducted, certified organisations shall implement a program of progressive reduction over time. In such cases, products exported to countries where said pesticides are not allowed by law shall be tested before export to assure that residue levels are negligible or are, at least, compliant with residue limits set in the country of import.</p>	<p>9.6.3 Levels I, II and II</p> <p>CORE - In cases where producers use a pesticide that is legally authorised in their country but is restricted in the buyer market, the producers shall implement a progressive reduction programme. Level II and III operators shall test products before export to ensure that residue levels of such pesticide are negligible or are, at least, compliant with residue limits set in the country of import.</p> <p>Guidance: The certified organisation must show awareness on the pesticide which are not permitted on the market(s) they intend to sell to. Furthermore, a mitigation plan must have been developed to show the measures taken to ensure, elimination, reduction and or substitution of these pesticide. An example of a pesticide falling under this indicator is Paraquat.</p>	<p>Made Core</p>
<p>9.6.4 Level I</p> <p>Certified organisations shall use non-chemical weed control methods whenever possible, such as mechanical methods and management of crop rotations, crop succession and intercropping.</p> <p>Guidance: Operations that use agrochemicals should make stepwise changes in their systems to significantly minimize or eliminate the need for herbicides. There should be a monitoring of substances and quantities applied and the number of application per field. In the case of smallholders, this responsibility lays with farmer groups, operatives or first processor.</p>	<p>9.6.4 Level I</p> <p>Certified organisations shall use non-chemical weed control methods whenever possible, such as mechanical methods and management of crop rotations, crop succession and intercropping.</p> <p>Guidance: Operations that use agrochemicals should make stepwise changes in their systems to significantly minimize or eliminate the need for herbicides. There should be a monitoring of substances and quantities applied and the number of application per field. In the case of smallholders, this responsibility lays with farmer groups, cooperatives or first processor.</p>	
<p>9.6.5 Level I</p> <p>Certified organisations 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</p>	<p>9.6.5 Level I</p> <p>CORE - Certified organisations 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</p>	<p>Made Core as per public consultation</p>

defined in local laws and regulations and by manufacturers' recommendations or by documented best practices. Guidance: This will include a program of pesticide rotation designed to minimize development of pest resistance.	conditions, as defined in local laws and regulations and by manufacturers' recommendations or by documented best practices. Guidance: This will include a program of pesticide rotation designed to minimize development of pest resistance.	
9.7 Management of agrochemicals and chemical residues	9.7 Management of agrochemicals and chemical residues	
9.7.1 Level I CORE - Agrochemicals shall be applied using methods that minimize harm to human health, wildlife, plant biodiversity, and water and air quality.	9.7.1 Level I CORE - Agrochemicals shall be applied using methods that minimize harm to human health, wildlife, plant biodiversity, and water and air quality.	No modification
9.7.2 Level I Certified organisations 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. Guidance: Pesticides shall not be sprayed within 100 meters of human populated areas, and shall not be sprayed within 50 meters of bodies of water.	9.7.2 Level I CORE - Certified organisations 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. Guidance: Pesticides shall be sprayed as per local regulations requirements in terms of distance from populated areas and bodies of water. In the absence of such regulations, pesticides shall not be sprayed within 100 meters of human populated areas, and within 50 meters of bodies of water.	Made Core based on public consultation. Text in red also based on outcome of public consultation.
9.7.3 Level I 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 into such areas.	9.7.3 Level I CORE - 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 into such areas.	Made CORE
9.7.4 Level I Aerial spraying shall be conducted only under weather conditions that minimize drift to adjacent areas, and must be in compliance with local, national and regional laws.	9.7.4 Level I CORE Aerial spraying shall be conducted only under weather conditions that minimize drift to adjacent areas, and must be in compliance with local, national and regional laws.	Made CORE as per public consultation
9.7.5 Level I Residents within 1 km shall be informed at least one day in advance before aerial spraying is done.	9.7.5 Level I CORE - Residents within 1 km shall be informed at least one day in advance before aerial spraying is done.	Made CORE
9.7.6 Level I	9.7.6 Level I	Removal of the reference to the PAN international

<p>CORE - Aerial spraying shall not be carried out with pesticides listed in the WHO Classes Ia, Ib and II lists, Rotterdam Convention, Stockholm Convention, and PAN international list of highly hazardous pesticides.</p>	<p>CORE - Aerial spraying shall not be carried out with pesticides listed in the WHO Classes Ia, Ib and II lists, Rotterdam Convention, Stockholm Convention, and PAN international list of highly hazardous pesticides.</p>	<p>list of highly hazardous pesticides.</p>
<p>9.7.7 Level I Certified organisations shall adhere to quarantine periods, avoiding harvest until applied pesticide hazard for consumers is reduced to acceptable levels.</p>	<p>9.7.7 Level I CORE -Certified organisations shall adhere to quarantine periods, avoiding harvest until applied pesticide hazard for consumers is reduced to acceptable levels.</p>	<p>Made CORE as per public consultation</p>
<p>9.7.8 Level I Pesticides shall be handled, stored, transported, and disposed of according to manufacturers' instructions, legal requirements, or according to procedures documented to be superior. Guidance: Pesticides shall be stored and transported in original containers or in other appropriate containers clearly labelled to identify contents. Growers shall follow manufacturer's recommendations and legal requirements for disposing of agrochemical wastes and empty pesticide containers, and for cleaning all application equipment. Growers 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.</p>	<p>9.7.8 Level I, II and III CORE - Pesticides shall be handled, stored, transported, and disposed of according to manufacturers' instructions, legal requirements, or according to procedures documented to be superior. Guidance: Pesticides shall be stored and transported in original containers or in other appropriate containers clearly labelled to identify contents. Growers shall follow manufacturer's recommendations and legal requirements for disposing of agrochemical wastes and empty pesticide containers, and for cleaning all application equipment. Growers 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.</p>	<p>Made Core Included Level II and III</p>
<p>9.7.9 Level III Organisations shall test agricultural produce on receipt for chemical residues (e.g., pesticides) and harmful contaminants (e.g., mycotoxins), and maintain testing records. Guidance: Tests should be designed so that they are as relevant as possible to the specific risks involved. Frequency of tests shall be</p>	<p>9.7.9 Level I, II and III Organisations shall test products bound to commercialization for tolerance thresholds of chemical residues (e.g., pesticides) as regulated by the target market and for harmful contaminants (e.g., mycotoxins) maintaining testing records. Guidance: Tests should be designed so that they are as relevant as possible to the specific risks involved. Frequency of tests shall be</p>	<p>Inclusion of level I and II</p>

determined on the basis of a risk analysis conducted by the operation and evaluated by the certification body	determined on the basis of a risk analysis conducted by the operation and evaluated by the certification body.	
<p>Principle 10 – Traceable and segregated Chain of Custody</p> <p><i>Fulfilment of the indicators outlined in 10.1.1 through 10.3.9 qualify an economic operator to make a sustainability claim on final products offered to consumers and on any intermediate product as well. They apply to all links of the supply chain.</i></p>	<p>Principle 10 – Traceability and Chain of Custody</p> <p><i>Chain of custody requirements apply to the different levels of operation considered under ProTerra Standard, that is Levels I, II and III. This is because organisations pass their products on to another certified operator or receive material for its processing. Traceability indicators are part of the chain of custody. Fulfilment of the indicators outlined in 10.1.1 through 10.3.9 qualify an economic operator to make a sustainability claim on final products offered to consumers and on any intermediate product as well. They apply to all links of the supply chain.</i></p>	Text in red as per outcome of public consultation
10.1 Chain of Custody System	10.1 Chain of Custody System	
<p>10.1.1 All records referred to in the following indicators should be kept for 5 years or longer if required by local regulations and records shall be systematically managed and readily available for access.</p> <p>Guidance: The certification body will waive the retroactive aspect of this indicator for the first years of certification, in case local regulations do not provide for this.</p>	<p>10.1.1 Level I, II and III</p> <p>All records related to the Chain of Custody System shall be kept for 5 years or longer if required by local regulations</p> <p>Guidance: The certification body will waive the retroactive aspect of this indicator for the first years of certification, in case local regulations do not provide for this.</p>	
<p>10.1.2 The certified organisation shall have sufficient documentation and records to demonstrate traceability.</p> <p>Guidance: Examples of records for agricultural production: see 9.4.3. Examples of records for warehouse operations: • Reception records: crop type, weight, date, driver name, number of vehicle license plates, farm name, as well as analytical results. • Storage records: volume, number of silo or warehouse. • Shipment records. Examples of production records for processing plants: • Reception records: crop type, weight, date, driver name, number of vehicle license plates, farm or warehouse of origin, as well as analytical results. •</p>	<p>10.1.2 Level I, II and III</p> <p>The certified organisation shall have sufficient documentation and records to demonstrate traceability.</p> <p>Guidance: Examples of records for agricultural production: Seed and propagation material; • Information of planted area and plots, Crop type and volume records, and Analysis reports. Examples of records for warehouse operations: • Reception records: crop type, weight, date, driver name, number of vehicle license plates, farm name, as well as analytical results. • Storage records: volume, number of silo or warehouse. • Shipment records. Examples of production records</p>	

Processing records: date of process, production line or facilities used, volume and identification of raw material, volume of product made, product lot number, as well as analytical results. • Shipment records. For chain of custody operators (trader, dealer, distributor, co-packer and handler of certified sustainable material): ProTerra Chain of Custody Certificate (CCC) .	for processing plants: • Reception records: crop type, weight, date, driver name, number of vehicle license plates, farm or warehouse of origin, as well as analytical results. • Processing records: date of process, production line or facilities used, volume and identification of raw material, volume of product made, product lot number, as well as analytical results. • Shipment records. For chain of custody operators (trader, dealer, distributor, co-packer and handler of certified sustainable material): ProTerra Traceability Certificate of Compliance Traceability Certificate of Compliance (TCC) .	
10.1.3 The certified organisation shall assign lot numbers to 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.	10.1.3 Level I, II and III The certified organisation shall assign lot numbers to 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.	
10.1.4 Certified organisations shall maintain chain of custody traceability during transfer of ownership of a consignment of ProTerra certified product by means of a Chain of Custody Certificate (CCC) specific for that transaction. The information contained in the CCC shall include the following: volume of the consignment changing ownership, lot numbers and volumes of each lot of material contained in the consignment, identification of seller and buyer, date of the transaction. The CCC shall be retained by both economic operators.	10.1.4 Level I, II and III Certified organisations shall maintain chain of custody traceability during transfer of ownership of a consignment of ProTerra certified product by means of a Traceability Certificate of Compliance Traceability Certificate of Compliance (TCC) , specific for that transaction. The information contained in the TCC shall include the following: volume of the consignment changing ownership, lot numbers and volumes of each lot of material contained in the consignment, identification of seller and buyer, date of the transaction and, where applicable, information verifying that the specific lot of material referenced in the TCC complies with the relevant threshold for GMO . The TCC shall be retained by both economic operators.	
10.1.5 Certified organisation shall maintain and update inventory control documentation, including mass balance documentation verifying that volumes of ProTerra certified materials received are equal to volumes disbursed.		

10.1.6 For sealed products that are packaged and labelled for the end user, for example, retail packages, use of CCCs is not required. However, the certified organisation shall maintain records that allow them to trace back from the lot number on the package to the lots of ProTerra certified ingredients contained in the product.	10.1.5 Level I, II and III For sealed products that are packaged and labelled for the end user, for example, retail packages, use of TCCs is not required. However, the certified organisation shall maintain records that allow them to trace back from the lot number on the package to the lots of ProTerra certified ingredients contained in the product.	
10.2 Mass balance <i>chain of custody</i> <i>Observation: Mass balance is applicable, for example, in situations where agricultural crops used in production do not have GM commercial varieties or risk of GM contamination. Other examples are situations where products do not claim organic status or controlled origin denomination.</i>	10.2 Mass balance	
10.2.1 A running total mass balance shall be maintained for inputs and outputs correlating the amounts of certified inputs with amounts of certified outputs. <i>Guidance: For certified industrial operations mass balance will be maintained for certified raw materials and proportional certified products, out of total raw material and total products which will include both certified and non-certified raw materials and products. For certified chain of custody operations mass balance will be maintained for certified product received quantity to an equal quantity of certified product shipped, out of a total handled product quantity that will include both certified and non-certified product.</i>	10.2.1 Level I, II and III A running total mass balance shall be maintained for inputs and outputs correlating the amounts of certified inputs with amounts of certified outputs taking into consideration conversion factors.	
	10.2.2 Level I, II and III In cases where a ProTerra certified material can be mixed with other non-GMO material, or with material that does not have commercial GMO varieties, a mass balance shall be maintained to demonstrate that volumes of ProTerra certified material received are equivalent to ProTerra certified material dispatched.	
10.3 Segregated chain of custody	10.3 Segregated chain of custody	

10.3.1 The economic operator shall have, and shall consistently employ, standard operating procedures for maintaining full segregation for each lot of ProTerra certified product from non-ProTerra materials from the point of receipt to the point of transfer to the next economic operator in the supply chain. As required in 5.2.2 , procedures and records may include, depending on the operation level: • Sampling plan for immunologically based screening using strip tests; • Sampling plan for PCR analyses; • Strip test procedure; • Strip test records; • PCR analysis reports; • Procedures of flushing or cleaning for product change in nondedicated sites;	10.3.1 Level I, II and III The economic operator shall have, and shall consistently employ, standard operating procedures for maintaining full segregation for each lot of ProTerra certified product from GMO materials from the point of receipt to the point of transfer to the next economic operator in the supply chain. Procedures and records may include, depending on the operation level: • Sampling plan for immunologically based screening using strip tests; • Sampling plan for PCR analyses; • Strip test procedure; • Strip test records; • PCR analysis reports; • Procedures of flushing or cleaning for product change in nondedicated sites.	
10.3.2 Precautions, including physical labelling of facilities and conveyances, must be in place to prevent co-mingling of ProTerra certified material and other material during transport and during loading and unloading of conveyances.	10.3.2 Level I, II and III Precautions, including physical labelling of facilities and conveyances, must be in place to prevent co-mingling of ProTerra certified material and other material during transport and during loading and unloading of conveyances.	
10.3.3 Conveyances used to transport ProTerra certified material shall be inspected before loading to verify freedom from residues of materials that are not ProTerra compliant, and if residues are observed, the conveyance shall be cleaned before loading ProTerra certified materials.	10.3.3 Level I, II and III Conveyances used to transport ProTerra certified material shall be inspected before loading to verify freedom from residues of materials that are not ProTerra compliant, and if residues are observed, the conveyance shall be cleaned before loading ProTerra certified materials. Inspection and cleaning of conveyances shall be documented.	
10.3.4 Inspection and cleaning of conveyances shall be documented.		
10.3.5 When ProTerra compliant material is transported as a part-load together with other material , systems and procedures must be in place to prevent mixing during loading, transport and unloading and to prevent errors in selection of the correct ProTerra certified product on delivery to the customer. Certified materials must be	10.3.4 Level I, II and III When ProTerra certified material is transported as a part-load together with other material, GMO or non-specified material as to genetic engineering modification , systems and procedures must be	

clearly identified and physically segregated to effectively prevent cross-contamination by non-compliant material.	in place to prevent mixing during loading, transport and unloading. Correct ProTerra certified product must be clearly identified and delivered to the customer.	
10.3.6 In the case of ProTerra certified materials that have GMO risk, certified organisation shall comply with Principle 5 and the CCC shall also include information verifying that the specific lot of material referenced in the CCC complies with the relevant threshold for GMO content - 0.1% or up to 0.9% depending on the claim made (see 5.1.2 guidance).	10.3.5 Level I, II and III Certified organisation shall comply with Principle 5 to demonstrate that genetically modified organisms are not used.	
10.3.7 A ProTerra chain of custody certified organisation will be able to merge or split received consignments of ProTerra certified products. To each new merged or split consignment a unique identification number must be assigned. Guidance: It should be noted that consignments of products certified under ProTerra Standard received by chain of custody certified organisations may consist of one production lot, or parts of one or more production lot	10.3.6 Level I, II and III A ProTerra chain of custody certified organisation will be able to merge or split received consignments of ProTerra certified products. To each new merged or split consignment a unique identification number must be assigned. Guidance: It should be noted that consignments of products certified under ProTerra Standard received by chain of custody certified organisations may consist of one production lot, or parts of one or more production lot	
10.3.8 The use of certified rework in the production of ProTerra certified products must be recorded in the product inventory. Mixing of certified materials with non-certified material is forbidden.		
10.3.9 Customer service, inventory management, and order fulfilment procedures must be in operation, verifying that the correct ProTerra certified product consignments have been shipped to customers ordering ProTerra certified products.	10.3.7 Level I, II and III Customer service, inventory management, and order fulfilment procedures must be in operation, verifying that the correct ProTerra certified product consignments have been shipped to customers ordering ProTerra certified products.	
SECTION III – Definition of Terms Abuse – mistreat: treat badly; maltreatment: cruel or inhumane treatment either verbal or physical in nature. Agrochemical – all synthetic or non-agricultural inputs used directly or indirectly in agricultural production, and for the maintenance of	Section III – Definition of Terms Abuse – mistreat: treat badly; maltreatment: cruel or inhumane treatment either verbal or physical in nature. Agrochemical – all synthetic or non-agricultural inputs used directly or indirectly in agricultural production, and for the maintenance of	

<p>equipment and storage, including: • Detergents • Pesticide control agents (including fungicides, herbicides, insecticides) • Fertilizers • Mineral oil-based products • Production aids such as cleaning agents</p> <p>Chain of Custody – the chain of economic operators through whose facilities a given lot of product has passed. A documented chain of custody, such as that required in the ProTerra Certification program, documents, at minimum, the identities of all economic operators in the chain, the unique identifiers for each lot of product passing from one economic operator to the next, and the volume of that product, as well as other important information regarding that lot of product, such as its GMO status. Chain of Custody Certificates (CCC) are the primary means of record keeping within the ProTerra documented chain of custody system.</p> <p>Consignment – volume of a shipment of product changing custody or ownership in the supply chain, composed of one or more production lots, or split from a given lot. A consignment can be comprised of merged consignments and can be split into various consignments. Each consignment is assigned a unique identification number for traceability purposes and inventory control.</p> <p>Core Indicator – this indicator is essential and must be met by applicants to be granted the ProTerra Standard certification. The Core Indicator shall be complied with from the beginning and maintained throughout the entire certification period.</p> <p>CFCs – a fluorocarbon with chlorine; formerly used as a refrigerant and as a propellant in aerosol cans; the chlorine in CFCs causes depletion of atmospheric ozone.</p> <p>Core Supplier/Service provider – a supplier of an input to the production process that is added to the product stream as part of the formulation of the final product to be certified under the ProTerra program. For instance, the supplier of soybeans is a core supplier to a soy crushing plant. Core service provider is a provider</p>	<p>equipment and storage, including: • Detergents • Pesticide control agents (including fungicides, herbicides, insecticides) • Fertilizers • Mineral oil-based products • Production aids such as cleaning agents</p> <p>Chain of Custody – the chain of economic operators through whose facilities a given lot of product has passed.</p> <p>Those organizations that act only as chain of custody economic operators, Level II, pass product as is, i.e. without transformation or further industrial processing.</p> <p>A documented chain of custody, such as that required in the ProTerra Certification program, documents, at minimum, the identities of all economic operators in the chain, the unique identifiers for each lot of product passing from one economic operator to the next, and the volume of that product, as well as other important information regarding that lot of product, such as its GMO status. Traceability Certificate of Compliances (TCC) are the primary means of record keeping within the ProTerra documented chain of custody system.</p> <p>Consignment – volume of a shipment of product changing custody or ownership in the supply chain, composed of one or more production lots, or split from a given lot. A consignment can be comprised of merged consignments and can be split into various consignments. Each consignment is assigned a unique identification number for traceability purposes and inventory control.</p> <p>Cooperative or Association of growers – a group of growers collectively seeking a common objective through combined effort.</p> <p>Core Indicator – Core indicator are those that are considered by the ProTerra Foundation as essential to mitigate sustainability negative impacts. This indicator is essential and must be met by applicants to be granted the ProTerra Standard certification. The Core Indicator shall be complied with from the beginning and maintained throughout the entire certification period.</p>	
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of essential services to the production system, such as outsourcing of labour.

Dedicated – used only for the storage, handling, transport, distribution, production or processing of certified non-GMO product.

Economic Operator – organisation or individual with legal ownership or physical control of agricultural commodities, derived products, and products made with them, [from agricultural production to consumer market, for any node or level in the supply chain](#). In the context of this Standard a Certified organisation means the same as a Certified Economic Operator.

GM (Genetically Modified or Genetic Modification) – products or processes employing gene splicing, gene modification, recombinant DNA technology, or transgenic technology. Also refers to products produced using one or more GM inputs or process elements. Cloned animals and their progeny are also considered GMOs under this Standard.

GMO-Risk Product – refers to any product derived from a food species of which GM varieties have been commercialized anywhere in the global food production system. Appendix [B](#) to this Standard is a list of crops and products that have high GMO risk.

GMO or Genetically Modified Organism – a plant, animal, or other organism whose genetic makeup has been modified using recombinant DNA (gene splicing) methods or food/feed products derived from such an organism. Refers to products derived from a species of which GM varieties have been commercialized somewhere in the global production system.

Greenfield expansion – a new project as well as expansion to an area where the crop has not been planted before, even if the operation is not a new plant.

Greenhouse Gases or Emissions – those gases, such as [water vapor](#), carbon dioxide, [tropospheric ozone](#), nitrous oxide, and methane,

Core Supplier/Service provider – a supplier of a [core](#) input that is added -as part of the formulation of the final product to be certified under the ProTerra program. For instance, the supplier of soybeans is a core supplier to a soy crushing plant. Core service provider is a provider of essential services to the production system, such as outsourcing of [harvesting](#) labour.

Dedicated – [facilities, equipment or vehicles](#) used only for the storage, handling, transport, distribution, production or processing of certified non-GMO product.

Economic Operator – organisation or individual with legal ownership or physical control of agricultural commodities, derived products, and products made with them. [Economic operators may be in any node of the supply chain](#). In the context of this Standard a [certified organisation](#) means the same as a [certified economic operator](#).

Environmental and Social Impact Assessment (ESIA) – [a structured and technically based process for predicting and assessing the potential environmental and social impacts of a proposed project, and designing appropriate compensation, mitigation, management and monitoring measures to deal with negative impacts.](#)

GM (Genetically Modified or Genetic Modification) – products or processes employing gene splicing, gene modification, [DNA editing](#), recombinant DNA technology, or transgenic technology. Also refers to products produced using one or more GM inputs or process elements. Cloned animals and their progeny are also considered GMOs under this Standard.

GMO (Genetically Modified Organism) – a plant, animal, or other organism whose genetic makeup has been modified using recombinant DNA (gene splicing) [or DNA editing](#) methods or food/feed products derived from such an organism. Refers to products derived from a species of which GM varieties have been commercialized somewhere in the global production system.

<p>which are transparent to solar radiation but opaque to longwave radiation.</p> <p>Grower – a person or organisation that develops activities required for the cultivation of crop plants and/or management of animals.</p> <p>Halons – a compound in which the hydrogen atoms of a hydrocarbon have been replaced by bromine and other halogen atoms. Examples of halons are: Hydrobromofluorocarbon (HBFCs) and hydrochlorofluorocarbon (HCFCs).</p> <p>Identity Preservation/Identity Preserved (IP) – use of segregation and traceability procedures to maintain the identity of specific lots of agricultural or processed products throughout all stages of production, maintenance, transportation, storage and processing. IP is primarily used to preserve the authenticity of defined traits or characteristics of products, one of which is the Non-GMO status of the product.</p> <p>Indentured Servant – a labourer under contract to work for an employer for a specific amount of time to pay off a debt. Typically the employers provide little if any monetary remuneration; however, they are responsible for accommodation, food, other essentials, and training.</p> <p>Inputs – any material or substance that becomes a part of the final product, or a component of which becomes a part of the product. These include the following:</p> <ul style="list-style-type: none"> • Agricultural inputs, such as seeds, fertilizers, and pesticides • Unprocessed agricultural products, such as vegetables, grains, fruit, greens, herbs, and other fresh foods etc. • Feed components, such as grains, forage plants, vitamins, enzymes, minerals • Manufacturing and processing inputs, including ingredients, flavourings, seasonings, colourings, additives, and all other substances present in final, manufactured products, such as residues of processing aids. 	<p>GMO-Risk Product – refers to any product derived from a food species of which GM varieties have been commercialized anywhere in the global food production system. Appendix A to this Standard is a list of crops and products that have high GMO risk.</p> <p>Greenfield expansion – a new project as well as expansion to an area where the crop has not been planted before, even if the operation is not a new industrial plant.</p> <p>Greenhouse Gases or Emissions – those gases, such as carbon dioxide, nitrous oxide, and methane, which are transparent to solar radiation but opaque to longwave radiation.</p> <p>Grower – a person or organisation that develops activities required for the cultivation of crop plants and/or management of livestock.</p> <p>High Conservation Value (HCV) is an area that has a biological, ecological, social or cultural value of outstanding significance or critical importance as follows. Examples are:</p> <ul style="list-style-type: none"> • areas with species diversity, concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels; • areas with landscape-level ecosystems and mosaics large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance; • areas with ecosystems and habitats that are rare, threatened, or endangered, habitats or refugia; • areas that have ecosystem services or basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes; areas with ecosystem services or basic ecosystem 	
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<p>Integrated Pest Management (IPM) – IPM programs use current, comprehensive information on the life cycles of pests and their interaction with the environment. This information, in combination with available pest control methods, is used to manage pest damage by the most economical means, and with the least possible hazard to people, property, and the environment.</p> <p>International Treaties and Conventions – an agreement under international law entered into by actors in international law, namely states and international organisations. A treaty may also be known as: (international) agreement, protocol, covenant, convention, exchange of letters, exchange of notes, memorandum of understanding, etc. Regardless of the terminology, all of these international agreements under international law are equally treaties and the rules are the same.</p> <p>Labour/Trade Unions – an organisation of individuals associated through type of employment, or labour. These organisations may be comprised of individual workers, professionals, past workers, or the unemployed. The most common, but by no means only, purpose of these organisations is “maintaining or improving the conditions of their employment.”</p> <p>Lot – volume of product originated in agriculture or industrial processing assigned a unique identification number linking that production volume to a given period.</p> <p>Minimum or Basic Salary or Wage – the lowest wage, determined by law or contract, that an employer may pay an employee for a specified job.</p> <p>Montreal Protocol – a treaty signed in 1987, which governs stratospheric ozone protection and research, and the production and use of ozone-depleting substances. It provides for the end of production of ozone-depleting substances such as CFCs.</p>	<p>services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and</p> <ul style="list-style-type: none"> • areas with cultural values, sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or indigenous peoples. <p><i>(Source: HCV COMMON GUIDANCE FOR IDENTIFICATION, HCV Resource Network, Oct 2013).</i></p> <p>Identity Preservation/Identity Preserved (IP) – use of segregation and traceability procedures to maintain the identity of specific lots of agricultural or processed products throughout all stages of production, maintenance, transportation, storage and processing. IP is primarily used to preserve the authenticity of defined traits or characteristics of products, one of which is the Non-GMO status of the product.</p> <p>Indentured Servant – a labourer under contract to work for an employer for a specific amount of time to pay off a debt. Typically the employers provide little if any monetary remuneration; however, they are responsible for accommodation, food, other essentials, and training.</p> <p>Inputs – any material or substance that becomes a part of the final product, or a component of which becomes a part of the product. These include the following: • Agricultural inputs, such as seeds, fertilizers, and pesticides • Unprocessed agricultural products, such as vegetables, grains, fruit, greens, herbs, and other fresh foods etc. • Feed components, such as grains, forage plants, vitamins, enzymes, minerals • Manufacturing and processing inputs, including ingredients, flavourings, seasonings colourings, additives, and all</p>	
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<p>Non-Core Supplier – a supplier of inputs or services that are not core to the production system, such as providers of telephone services, equipment or other repair services.</p> <p>Non-GMO or Non-GM – A plant, animal, or other organism or derivative of such an organism whose genetic structure has not been altered by gene splicing, or a process or product that whose production does not employ GM processes or inputs.</p> <p>Organisation of growers – a cooperative, association, group or other types of organisation collectively seeking a common objective through combined effort.</p> <p>Outgrower supplier – external suppliers of the certified operation not included in the certification supply area. The volume of outgrower suppliers must not be counted under the certified volume. Outgrowers have to sign a Code of Conduct to ensure compliance with legal requirements.</p> <p>PCR analyses – a biochemistry and molecular biology technique for isolating and exponentially amplifying a fragment or sequence of interest of DNA, via enzymatic replication, without using a living organism.</p> <p>Pesticide – a collective term that refers to all insecticides, fungicides, and herbicides.</p> <p>Product – that which the certified organisation offers to the marketplace, at whatever stage of the production chain (i.e., final consumer product, ingredient for further manufacturing, raw agricultural crop or commodity, etc., as applicable). “Product” refers to products that are involved in the ProTerra certification program. Program, or the ProTerra Program – As used in this document, the term Program with a capitalized “P” signifies solely the ProTerra Certification Program.</p> <p>Segregation – The system of facilities, equipment, and procedures through which an Economic Operator keeps ProTerra certified</p>	<p>other substances present in final, manufactured products, such as residues of processing aids.</p> <p>Integrated Pest Management (IPM) – IPM programs use current, comprehensive information on the life cycles of pests and their interaction with the environment. This information, in combination with available pest control methods, is used to manage pest damage by the most economical means, and with the least possible hazard to people, property, and the environment.</p> <p>International Treaties and Conventions – an agreement under international law entered into by states and international organisations. A treaty may also be known as: (international) agreement, protocol, covenant, convention, exchange of letters, exchange of notes, memorandum of understanding, etc. Regardless of the terminology, all of these international agreements under international law are equally treaties and the rules are the same.</p> <p>Labour/Trade Unions – an organisation of individuals associated through type of employment, or labour. These organisations may be comprised of individual workers, professionals, past workers, or the unemployed. The most common, but by no means only, purpose of these organisations is “maintaining or improving the conditions of their employment.”</p> <p>Legal Minimum Wage – the lowest wage, determined by law or collective agreement that an employer has to be pay to a worker for a specified job. This excludes overtime premium.</p> <p>Lot – volume of product originated in agriculture or industrial processing assigned a unique identification number linking that production volume to a given period.</p> <p>Mass Balance - Mass balance: A system for control of the input quantities and equivalent output of certified material/products in each stage of the supply chain, taking into account conversion rates, in case of processing. For agricultural crops without GMO varieties</p>	
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<p>product physically separate from non-ProTerra certified material from the point of receipt to the point of transfer to the next Economic Operator in the chain of custody.</p> <p>Smallholder/Family farm – a farm where the majority of labour is provided by family members. This is the same as a family farm or family agriculture.</p> <p>Stakeholder – a party with an interest or concern in a given program, event, or system.</p> <p>Standard – the “Standard” herein refers to the Standard for the ProTerra certification program, which is this document.</p> <p>Strip test – immunologically-based screen-testing strip devices, which analyse the protein expressed by the DNA, and used as a rapid and on-site method for identification of GM seed or crops.</p> <p>Supplier – any party from whom an input or service is obtained.</p> <p>Traceability – the system of documentation that enables any economic Operator in the chain of custody to trace the product or raw material or a derivative thereof back through the chain of custody and ultimately to the farm.</p> <p>Worker Welfare Laws – a program that may include any or all of the following types of worker benefits: retirement benefits, disability income, veteran’s pension, public housing and food stamp program.</p>	<p>or risk of GMO contamination, the mass balance allows physical mixing of certified and non-certified materials. For crops with risk of GMO contamination, physical segregation shall be maintained.</p> <p>Non-GMO or Non-GM – A plant, animal, or other organism or derivative of such an organism whose genetic structure has not been altered by gene splicing, gene modification, recombinant DNA technology, transgenic technology, DNA editing, or by a process or product whose production utilizes GM processes or inputs.</p> <p>PCR analyses –biochemistry and molecular biology techniques for isolating and exponentially amplifying a fragment or sequence of interest of DNA, via polymerase replication, without using a living organism.</p> <p>Pesticide – a collective term that refers to all insecticides, fungicides, and herbicides.</p> <p>Product – materials or goods that are assessed as part of the ProTerra Standard certification process, which the certified organization offers to the market, at whatever stage of the production chain (i.e. as a final consumer product, an ingredient for further manufacturing, a raw agricultural crop or commodity, etc.).</p> <p>Segregation – the system of facilities, equipment, and procedures through which an Economic Operator keeps (1) material bound to ProTerra certification physically separated from GMO material; and (2) ProTerra certified product physically separated from non-ProTerra certified material from the point of receipt to the point of transfer to the next Economic Operator in the chain of custody.</p> <p>Smallholder— a farm where the majority of labour is provided by family members. This includes family farm or family agriculture.</p> <p>Stakeholder – a party with an interest or concern in a given program, event, supply chain or system.</p> <p>Standard – the “Standard” herein refers to the Standard for the ProTerra certification program, which is this document.</p>	
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	<p>Strip test – immunologically-based screen-testing strip devices, which analyse the protein expressed by the DNA, and used as a rapid and on-site method for identification of GM seed or crops.</p> <p>Supplier – any party from whom an input or service is obtained.</p> <p>Traceability – the system of documentation that enables any economic operator in the supply chain to trace the product or raw material or a derivative thereof back through the supply chain.</p> <p>Worker – this term refers to direct employees of an organization, subcontractors working at or for the organization at the organization's premises. It also includes all permanent and temporary members of the organization's labour force.</p>	
APPENDIX A: list of commercialized GM crops and their derivatives	APPENDIX A: list of commercialized GM crops and their derivatives	TEXT Remains unchanged
APPENDIX B: list of relevant international treaties and conventions	APPENDIX B: list of relevant international treaties and conventions	TEXT Remains unchanged
<p>APPENDIX C: Pesticides listed in WHO classes 1a, 1b and II, Rotterdam Convention and Stockholm Convention, and Pan International list of Highly Hazardous Pesticides.</p> <p>Please refer to the websites listed below regarding pesticides and other hazardous chemicals that may not be used in the production of ProTerra certified materials.</p> <p>WHO classes 1a, 1b and II http://www.who.int/ipcs/publications/pesticides_hazard/en/index.html</p> <p>Rotterdam Convention http://www.pic.int/TheConvention/Chemicals/AnnexIIICChemicals/tabid/1132/language/enUS/Default.aspx</p>	<p>APPENDIX C: Pesticides listed in WHO classes 1a, 1b and II, Rotterdam Convention and Stockholm Convention, and Pan International list of Highly Hazardous Pesticides.</p> <p>Please refer to the websites listed below regarding pesticides and other hazardous chemicals that may not be used in the production of ProTerra certified materials.</p> <p>WHO classes 1a, 1b and II http://www.who.int/ipcs/publications/pesticides_hazard/en/index.html</p> <p>Rotterdam Convention http://www.pic.int/TheConvention/Chemicals/AnnexIIICChemicals/tabid/1132/language/enUS/Default.aspx</p>	

<p>Stockholm Convention</p> <p>http://chm.pops.int/Convention/ThePOPs/The12InitialPOPs/tabid/296/Default.aspx</p> <p>http://chm.pops.int/Convention/ThePOPs/TheNewPOPs/tabid/2511/Default.aspx</p> <p>http://chm.pops.int/Convention/ThePOPs/ListingofPOPs/tabid/2509/Default.aspx</p> <p>Pan International list of Highly Hazardous Pesticides</p> <p>http://www.panna.org/issues/publication/pan-international-list-highly-hazardous-pesticides</p> <p>NOTE - Observe that the names of all the materials listed in these websites are just generic chemical names. Brand names/commercial products are not provided. It is necessary that all certified operations compare all products labels with these lists. The Certification Body and their auditors shall verify if all labels properly list the names of all the components of commercial formulations of the agrochemical products.</p>	<p>Stockholm Convention</p> <p>http://chm.pops.int/Convention/ThePOPs/The12InitialPOPs/tabid/296/Default.aspx</p> <p>http://chm.pops.int/Convention/ThePOPs/TheNewPOPs/tabid/2511/Default.aspx</p> <p>http://chm.pops.int/Convention/ThePOPs/ListingofPOPs/tabid/2509/Default.aspx</p> <p>NOTE - Observe that the names of all the materials listed in these websites are just generic chemical names. Brand names/commercial products are not provided. It is necessary that all certified operations compare all products labels with these lists. The Certification Body and their auditors shall verify if all labels properly list the names of all the components of commercial formulations of the agrochemical products.</p>					
	<p>Appendix D: Addendum for Crop Trees</p> <p>The guidance below is applicable to crop trees, such as almonds, coconut, cocoa, hazelnut, coffee, oranges, etc. It is not intended to be prescriptive but to be adapted and interpreted according to the edafoclimatic conditions of each crop and agricultural region to be verified or certified.</p> <table><tr><th>INDICATOR Number</th><th>INDICATOR and CROP TREE SPECIFIC GUIDANCE</th></tr><tr><td>6.1.3</td><td>CORE - Certified organisations shall discharge sewage water/effluents in a manner that does not cause pollution to water, and does not contaminate the soil or crops with</td></tr></table>	INDICATOR Number	INDICATOR and CROP TREE SPECIFIC GUIDANCE	6.1.3	CORE - Certified organisations shall discharge sewage water/effluents in a manner that does not cause pollution to water, and does not contaminate the soil or crops with	
INDICATOR Number	INDICATOR and CROP TREE SPECIFIC GUIDANCE					
6.1.3	CORE - Certified organisations shall discharge sewage water/effluents in a manner that does not cause pollution to water, and does not contaminate the soil or crops with					

	<p>chemicals, heavy metals, by-products, excess nutrients or pathogens. Raw sewage shall not be used to irrigate crops.</p> <p>Guidance for crop trees: One should not use recycled or reclaimed water, as a source of irrigation water, unless documented as having received tertiary treatment which includes a terminal pathogen disinfection step.</p> <p>6.2.2 CORE- Certified organisations shall manage biological wastes such as manure, straw, crop residues, food scraps, processing by-products, among others, appropriately in order to avoid pollution and/or to prevent these from becoming a source of pathogenic contamination or pest harbourage. Management of these wastes shall at least comply with national laws relevant to the location of the certified operation, as stated in Principle 1 of this standard</p> <p>Guidance for crop trees: Manure must be stored away from areas where tree crops are grown and handled; Manure slurry is to be stored for at least 60 days in the summer and 90 days in the winter before applying to fields.</p> <p>Physical barriers and/or diversion buffer must be deployed to prevent runoff from stacked piles into water sources, equipment storage areas, orchard traffic areas or into the orchard.</p> <p>Non-composted raw manure must be aged for at least six months prior application.</p> <p>Non composted, untreated manure should never be applied fewer than 120 days prior to harvest. Manure is to be applied at the end of the season, preferably</p>	
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	<p>when soils are warm, not saturated and/or cover cropped.</p> <p>When planting new trees, manure is to be spread two weeks before planting. Manure is to be incorporated into the soil immediately after application to minimize wind drift and water runoff.</p> <p>Tractors, frontend loaders, and other tools and equipment used in handling manure are to be thoroughly cleaned after each use.</p> <p>Wash water is to be prevented from draining to water sources, the orchard floor or any area where harvested crops are handled or stored.</p> <p>All food and beverage containers or other metallic and glass materials must be kept out of the orchard, as potential sources of foreign-material contamination.</p> <p>9.1.1 (CORE) Growers shall adopt agricultural best practices and, where possible, adopt conservation systems such as Integrated Pest Management (IPM) and organic agricultural practices.</p> <p>Guidance for crop trees: A regular program for inspection of all buildings, structures and fields must be developed, to check for evidence of pest populations or deposits of animal droppings. The program should include regular and frequent monitoring of affected and treated areas to accurately assess the program's effectiveness. Inspections should be documented on a simple site identified checklist.</p> <p>The accumulation of pest and vector attractants, including water, cull piles and any food source must be prevented. Garbage, trash and related debris is to be collected and removed frequently. All waste receptacles should have tight-fitting covers. Insect pest build-up must be prevented. Rodent and small mammal</p>	
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	<p>population build-up must be prevented, unless the presence of predators and raptors are welcome for pest management.</p> <p>Pests must be removed from traps and property to ensure clean and sanitary facilities and to avoid attracting additional pests. All equipment contact surfaces with crops must be regularly inspected for evidence of animal droppings or deposits and soiled surfaces must be sanitized with approved disinfectants.</p> <p>All government regulations and pesticide label instructions must be thoroughly followed.</p> <p>The pest control program must be documented.</p> <p>9.3.4 (CORE) Certified organisations shall minimize soil erosion and damage to soil structure caused by wind, water, human activity and presence of farm animals.</p> <p>Guidance for crop trees: Domestic animals are prevented from free access to the orchard. Wild animal and bird traffic through the orchard is minimized by eliminating all sources of habitat, nesting and hiding places for rodents and other vermin in and around the orchard and farm operational areas. This will include keep equipment “boneyards” and debris piles away from orchards, and inspect unused buildings for possible issues with pest nesting.</p> <p>All food and beverage containers or other metallic and glass materials must be kept out of the orchard, as potential sources of foreign-material contamination.</p> <p>Suitable methods should be used to keep dust to a minimum. Minimizing dust helps reduce the spread of contamination, and is one additional benefit of meeting or exceeding air quality objectives.</p>	
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	<p>The orchard floor is to be kept as level, smooth and dry as practical during the season.</p> <p>Development of uneven areas within inter-row spaces should be prevented that could result in pooling of rainfall.</p> <p>If needed, temporary shallow diversion channels may be formed to prevent rainfall accumulation, draining from the tree-line soil surface to the drying windrows.</p> <p>9.4.4 (CORE) Certified organisations shall maintain records of all fertilizer, pesticides, other agrochemicals and other inputs purchased, used, and disposed of, including biocontrol agents. Records of pests, diseases, weather conditions during spraying, and weeds shall also be recorded.</p> <p>Guidance for crop trees: Fertilizer application records must typically include: type of manure or compost used, the rates, and locations of the applications.</p> <p>9.7.1 (CORE) Agrochemicals, including pesticides, shall be applied using methods that minimize harm to human health, wildlife, plant biodiversity, and water and air quality.</p> <p>Guidance for crop trees: Where applicable pesticides, must be managed in a way such that it will not affect pollinating bees, and only pesticides that will not interfere with the population of bees will be used.</p>	
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ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

NOTE: The text with the suggestion made and the reference to ProTerra principle, criterion and indicator number are sole responsibility of the stakeholder that have provided their input either via email or by filling a form at the ProTerra Foundation website during the public consultation period. This table shows the response given to the stakeholders that are identified by sector. Please note the suggestions, and therefore responses, have been in several cases repeated. In all cases, participating stakeholders have received individual feedback from ProTerra on the responses.

Stakeholder	Principle, Criterion and Indicator number	Suggestion	ProTerra Foundation reply
NGO	5	Please mention about the new genetic technologies like CRISPR Cas and Gene Drives. And please consider them as GMOs. ProTerra should not be allowed those things which may cause great damage to living things on Earth.	ProTerra acknowledges that both technologies are relatively new and that more study is required to understand them and their impacts and/or potential uses in agricultural commodities. ProTerra will include in version 4.0 "DNA editing" in the definition of GMO and will observe how these new technologies evolve and can in the future explicitly consider these technologies equivalent to GMO.
Agricultural Cooperative/feed compounder	Principle 1	This must be a CORE requirement.	Principle 1 refers to the need of legal compliance. It is noted that several indicators of ProTerra, that are based on legal requirements are already CORE and that several indicators under Principle 1 are also CORE. We understand that making this principle CORE (or all of these indicators) is an unnecessary duplication of effort.
Agricultural Cooperative/feed compounder	2.9.5	a) Delete sentence in the Guidance:“The cut-off date can be adjusted for specific regions, and can be modified to include compensatory measures for certain limited periods. However, the fundamental principle of the ProTerra Standard is that conversion of native vegetation and HCVAs is not allowed.”..... This sentence in the guidance is not clear and can lead to misunderstanding. We recommend to delete this sentence. b) use correct terminology HCVA Network should	Terminology will be corrected and guidance will be rephrased to avoid misunderstanding (we believe the reference relates to indicator 4.1.1 and not 2.9.5).

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

NOTE: The text with the suggestion made and the reference to ProTerra principle, criterion and indicator number are sole responsibility of the stakeholder that have provided their input either via email or by filling a form at the ProTerra Foundation website during the public consultation period. This table shows the response given to the stakeholders that are identified by sector. Please note the suggestions, and therefore responses, have been in several cases repeated. In all cases, participating stakeholders have received individual feedback from ProTerra on the responses.

		be HCV Resource Network and HCVAs should be HCVs.	
Agricultural Cooperative/feed compounder	2.5.2	Must be core	Will be revised to be considered core. It is relevant in avoiding modern slavery.
Agricultural Cooperative/feed compounder	2.7.1	Must be core	Will be made CORE
Agricultural Cooperative/feed compounder	4.2.1	Must be core	Considering the need to reinforce ProTerra position in protecting biodiversity this indicator will be considered Core
Agricultural Cooperative/feed compounder	4.2.2	Must be core	Considering that indicated 4.2.1 will be considered CORE in version 4.0, ProTerra considers it is not necessary to make this indicator additionally CORE at this stage. It is important to have a balance between CORE and non-CORE indicators to ensure adherence to the Standard and in this way strive improvements.
Agricultural Cooperative/feed compounder	4.3.1	Must be core	To be considered CORE in revision 4.0. Large operations are to be considered as defined at the country level. In the absence of such definition producer must provide to certification body independent and technically sound justification as to the classification of its future operation. Guidance text will be improved.
Agricultural Cooperative/feed compounder	6.2.5	Must be core	The matter will be considered Core under version 4.0, however not applicable to smallholders (note that in most countries this is a legal compliance issues: operations must meet discharge parameters falling within Principle 1). Please also note that Principle 6 will undergo major modification in order to ensure a more clear approach specially related to hazardous waste management. Under version 4.0 indicator 6.2.5 will correspond to the new 6.1.3 (CORE).
Agricultural Cooperative/feed compounder	7.1.2	Must be core	Water scarcity and water disputes have gained a significant relevance in the last years. This indicator will be considered Core in version 4.0, but not applicable to smallholders.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Agricultural Cooperative/feed compounder	9.2.1	Must be core	Will be made a CORE requirement under revision 4.0
Agricultural Cooperative/feed compounder	9.2.3	Must be core	Indicator 9.2.1 (related to opening new areas for cultivation with fire) will be made a CORE requirement under revision 4.0. Making 9.2.3 also CORE at this point is considered unnecessary and can jeopardize implementation of the standard in overall improvement overtime. Under version 4.0 this indicator will be renumbered as 9.2.2.
Agricultural Cooperative/feed compounder	9.3.1	Must be core	Will be made CORE (and joined with 9.3.2)
Agricultural Cooperative/feed compounder	9.6.4	Must be core	The indicator is a " whenever possible " therefore it cannot be CORE. Additionally, pesticide usage has many CORE indicators that aim at ensuring that only authorised pesticides are used. Making this indicator CORE would nullify several other indicators such as 9.6.2.
Agricultural Cooperative/feed compounder	9.2.1	Merge 9.2.1 and 9.2.3	9.2.1 will be made a CORE requirement under revision 4.0, text and guidance will be reviewed to improve clarity. However, indicators will not merge to allow for a gradual improvement on this topic.
Agricultural Cooperative/feed compounder	9.2.3	Merge 9.2.1 and 9.2.3	Indicator 9.2.1 (related to opening new areas for cultivation with fire) will be made a CORE requirement under revision 4.0. Making 9.2.3 also CORE at this point is considered unnecessary and can jeopardize implementation of the standard in overall improvement overtime. Indicators will not merge. Under version 4.0 this indicator will be renumbered as 9.2.2.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

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Agricultural Cooperative/feed compounder	9.6.3	The indicator shall be deleted. This indicator is very problematic. It nullifies the intention of 9.6.2 which is CORE. As it will take about 2 years before the new standard will be applied in the field	The intention of this indicator is not nullifying 9.6.2 rather it is to recognize reality that exists in many locations where a ban pesticide under WHO is legally authorized in a country. Experience has shown that when a more stringent requirement is established than those set under national regulation the adherence to it is reduced. The approach for ProTerra 4.0 will be different and the indicator will be modified to focus on producers that use a pesticide that is legally authorized in their country for crops that are to be exported to countries that have restrictions to the said pesticide. This indicator will be made CORE.
Food Manufacturer	Rules about compliance requirements:	The ProTerra Standard distinguishes between CORE indicators and other indicators. To be added: Audit reports from approved organisations/producers are made public available (www.xxxxx.com)	ProTerra understands that audit report brings sensitive information about business and can impact competition. Organizations are free to make their audit reports publicly available. ProTerra Foundation is currently striving to understand GDPR (general data protection regulation) and its impact in the disclosure of such type of data. Please note that ProTerra publishes in its web page consolidated information.
Food Manufacturer	1.1.5	Must be Core	This requirement will be removed from version 4.0. Indicators are evaluated individually and most are based on legal requirements.
Food Manufacturer	2.2.5	Suggest this paragraph to be Core	Considering the modern slavery topics, this indicator will be considered CORE
Food Manufacturer	2.2.6	Suggest this to be Core	Considering that indicators 2.2.5 (all overtime work shall be voluntary) will be made CORE under version 4.0, ProTerra understands that it is not necessary to make 2.2.6 also CORE at this stage and worker may or may not adhere to additional work demand as per their interest and needs. Additionally, local labour regulations typically cover this relation. It will be clarified that where agreements with Union exist these will be respected.
Food Manufacturer	2.5.2	Must be Core	Will be revised to be considered core. It is relevant in avoiding modern slavery.
Food Manufacturer	2.6.3	Suggest to be Core	ProTerra considers it is not necessary to make this indicator CORE at this stage. It is important to have a balance between CORE and non-Core indicators to ensure adherence to the Standard and in this way strive improvements.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Food Manufacturer	2.7.1	Must be Core	Will be made CORE
Food Manufacturer	2.9.1	Suggest to be Core	This will be made CORE under ProTerra 4.0 (2.9.1 will be integrated to 2.9.2 that is CORE)
Food Manufacturer	2.9.5	Delete the second part of the Guidance text. Otherwise the indicator is over ruled.	Second part of the guidance will be deleted.
Food Manufacturer	2.9.6	Must be Core	Will be made CORE. A guidance will be added on the need of training on usage of PPEs.
Food Manufacturer	2.9.7	Must be Core	Considering that indicator 2.9.6 will be considered CORE in version 4.0, ProTerra considers it is not necessary to make this indicator also CORE at this stage. It is important to have a balance between CORE and non-CORE indicators to ensure adherence to the Standard and in this way strive improvements.
Food Manufacturer	2.11.1	Indicator must be Core	ProTerra considers that it is already CORE the fact that certified organisations shall implement procedures to assure consistent compliance with legal requirements. Maternity leave is in general regulated by national regulations and the indicators 2.11.1 and 2.11.2 just reinforces the need to comply with a legal obligation. They will not be made CORE. As for 2.11.3 considering that there are country's where maternity leave is not regulated, to ensure that woman's rights are protected, the indicator will be made CORE.
Food Manufacturer	2.11.2	Indicator must be Core	ProTerra Considers that it is already CORE the fact that certified organisations shall implement procedures to assure consistent compliance with legal requirements. Maternity leave is in general regulated by national regulations and the indicators 2.11.1 and 2.11.2 just reinforces the need to comply with a legal obligation. They will not be made CORE. As for 2.11.3 considering that there are country's where maternity leave is not regulated, to ensure that woman's rights are protected, the indicator will be made CORE.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Food Manufacturer	2.11.3	Indicator must be Core	ProTerra Considers that it is already CORE the fact that certified organisations shall implement procedures to assure consistent compliance with legal requirements. Maternity leave is in general regulated by national regulations and the indicators 2.11.1 and 2.11.2 just reinforces the need to comply with a legal obligation. They will not be made CORE. As for 2.11.3 considering that there are country's where maternity leave is not regulated, to ensure that woman's rights are protected, the indicator will be made CORE.
Food Manufacturer	4.1.1	Delete the two last sentences in Guidance text starting with: The cut-off date can be adjusted	Guidance will be rephrased to avoid misunderstanding and terminology will be corrected
Food Manufacturer	4.1.2	Must be Core	Will be made CORE
Food Manufacturer	4.1	Please use the more correct terminology HCV Resource Network and HCVs.	Terminology will be corrected
Food Manufacturer	4.2.1	Must be Core	Considering the need to reinforce ProTerra position in protecting biodiversity this indicator will be considered Core
Food Manufacturer	4.2.3	Must be Core	It will be made CORE
Food Manufacturer	4.3.1	Must be Core	To be considered CORE in revision 4.0. Large operations are to be considered as defined at the country level. In the absence of such definition producer must provide to certification body independent and technically sound justification as to the classification of its future operation. Guidance text will be improved.
Food Manufacturer	6.2.4	Must be Core	Will be made CORE
Food Manufacturer	7.1.2	Must be Core	Water scarcity and water disputes have gained a significant relevance in the last years. This indicator will be considered Core in version 4.0, but not applicable to smallholders.
Food Manufacturer	9.2.1	Must be Core and merged with 9.2.3	9.2.1 will be made a CORE requirement under revision 4.0, text and guidance will be reviewed to improve clarity. However, indicators will not merge to allow for a gradual improvement on this topic.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Food Manufacturer	9.3.1	Must be Core	Will be made CORE (and joined with 9.3.2)
Food Manufacturer	9.6.3	Delete this indicator as it is an back door around the Core indicator 9.6.2	The intention of this indicator is not nullifying 9.6.2 rather it is to recognize reality that exists in many locations where a ban pesticide under WHO is legally authorized in a country. Experience has shown that when a more stringent requirement is established than those set under national regulation the adherence to it is reduced. The approach for ProTerra 4.0 will be different and the indicator will be modified to focus on producers that use a pesticide that is legally authorized in their country for crops that are to be exported to countries that have restrictions to the said pesticide. This indicator will be made CORE.
Food Manufacturer	9.6.5	Must be Core	Will be made CORE
Food Manufacturer	9.7.2	Must be Core	Will be made CORE
Food Manufacturer	9.7.4	Suggest to be Core	This indicator will be made CORE
Food Manufacturer	9.7.7	Suggest to be core	Will be made CORE as it directly affects final consumer.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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CB	1.2.1	<p>1. Protocol ProTerra clause 1.2.1 Continuous Improvement For Certification compliance to Core clause >80% compliance for all clauses</p> <p>Suggestion to Introduce a form of continuous Improvement into the Certification a) For Initial Audit have some clauses that are “nice to have “ but if not in place do not stop Initial Certification However on year 2 audit these have to be in place and compliant. b) Introduce targets of compliance- Any site that does not achieve 100% compliance of clauses at this years audit has a self- agreed Target of this score +10% compliance at next years audit .</p>	Continuous improvement and opportunities are to be determined by each economic operator taking in account their own realities and resources. Indicator 1.2.1 determines that “certified organisations shall demonstrate continuous improvement regarding compliance with ProTerra Standard”, so without being prescriptive in terms of %, the current indicator covers improvements on compliance. ProTerra is not prescriptive in any of its indicators and wishes not to be so as it is applicable to a variety of different agricultural cultures and operations (food/feed processing and transportation). It is up to the audit team to structure the field work taking in consideration pass audit results to verify, in a robust way, continuous Improvement. Additionally, the corrective action plan, to be agreed with CB for the non-compliance identified, may include compliance targets as applicable. Finally, a requirement of 100% compliance would remove many operators from the ProTerra Scheme and in this way reduce extent of the potential beneficial impact of the implementation of the standard.
CB	general	Amend terminology of Core clauses to Mandatory	In the context of ProTerra CORE and MANDATORY have the same meaning there is no advantage in making this modification (it is just wording). Additionally, the expression CORE is already a jargon between ProTerra user.
CB	general	For sites achieving 3 years of 100% compliance are awarded “Gold status” on Certificate	At this point managing an additional award /scheme within the context of ProTerra operations is not feasible and adds no value to the final certified product.
CB	10	Section 10 needs a re-write for clarification of the Term and understanding of “Mass Balance”- ProTerra need to stipulate it is equivalence scheme like RSPO and not Mass Balance like Organic- reconciliation.	A definition of mass balance will be included in SECTION III – Definition of Terms of version 4.0
CB	10	Clarification of section 10. In opening to this section and in pre-amble of Standard. My understanding is all clauses of Section 10 apply for levels 1,2,3. If ProTerra Certification is for a Trader in	Your understanding is correct. Principle 10 – Traceable and segregated Chain of Custody is applicable to all level (to the extent the organisations pass their products on to another certified operator or receives material for its processing). Please refer to SECTION I – Scope of Certification. Text will be revised to minimized potential misunderstanding.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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		ProTerra certificated material then if the Trader wants a certificate only section 10 is audited	
CB	general	Site to have audited supplier of Agency Labour to ensure operating legally	It is not possible to link the certification of a voluntary standard to an audit from an official labour agency as one has no control as to when these official inspections may occur or if they will occur at all. On the other hand, evidence of a successful audit from a Labour agency may be a robust evidence used by the auditors to confirm or not compliance. However, defining audit evidences is outside the scope of ProTerra.
CB	2.1	Consider “Where young workers and children are present on a farm the producer shall be able to demonstrate knowledge of and compliance with the national and international laws regarding young workers and children.”	This consideration be incorporated as part of the guidance of 2.1.4
CB	2.1	Consider” The Farm shall carry out a risk assessment which identifies both labouring and non-labouring children, the hazards present, assesses potential risks and take actions to mitigate those risks.”	There are other means to verify compliance with the requirement of absence of slave and forced labour, child labour, and of coercive disciplinary or control methods such as interviews, field observations, procedures among others. A risk assessment is not feasible in most of the cases and once child labor is associated to CORE indicators it would jeopardize certification (reducing possibility of improvements in other key areas).
CB	3	Consider” The Producers should identify and eliminate any potential hazards to public health and safety caused by its operation.”	Elimination of potential hazards to public health and safety is already considered in topics related to: use of pesticide, waste and effluent management, avoidance of soil and water contamination and quarantine. Public health information is generated by public entities and producers do not have how to generate public health data to base any eventual action. Additionally, public health data related to agricultural activities is not an information readily available, if available, in many developing countries.
CB	general	Consider” Producers should work together to share best practice.”	This is outside the scope of ProTerra certification

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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CB	7	Consider” A risk assessment will be undertaken to determine the environmental impact on water sources particularly any that are under stress of water vulnerability.”	This is implicit under Principle 7 – Water managed conservatively
CB	7	Consider” All abstracted water must be used in accordance with regulatory requirements	This is implicit in Principle 1 – Compliance with law, international accords and the ProTerra Standard
CB	9	Consider” The producer shall record key soil health metrics and based on actions, plot improvement over time	This is implicit in 9.3.1 “Certified organisations shall define a soil and crop management regime that monitors soil quality, builds soil, enhances fertility and manages pests and diseases” and in 9.4.3 “Certified organisations shall maintain records of all agricultural production” (in guidance soil information is referred to). Please also refer to the guidance under 9.3.2.
CB	9	Consider” Field conditions should be assessed for the risk of soil degradation prior to operations being carried out and all field cultivations and operations should be recorded.”	This is implicit in 9.3.1 “Certified organisations shall define a soil and crop management regime that monitors soil quality, builds soil, enhances fertility and manages pests and diseases” and in 9.4.3 “Certified organisations shall maintain records of all agricultural production” (in guidance soil information is referred to). Please also refer to the guidance under 9.3.2.
CB	general	Consider” Producers should develop and implement a specific security plan for the protection of their premises, crops (and storage) and the environment to promote best practice in line with, regulatory requirements, international codes and procedures. The plan should include Producer layout, Producer inputs, equipment, staff, visitors and their movements.”	Security matters are currently outside the scope of ProTerra Certification
CB	financial	Consider” The farm should assess the financial implications, other risks and opportunities of introducing new innovations and equipment to build in capacity and economical sustainability of the farming operation	Economical sustainability aspect will be introduced in version 4.0 but yet in an initial stage. Future revision may consider the suggestion made.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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CB	financial	Consider" Farm led investment and adoption of innovation/ best practice initiatives to enhance the economical performances of the farm and production should be documented and recorded	Economical sustainability aspect will be introduced in version 4.0 but yet in an initial stage. Future revision may consider the suggestion made.
CB	2.3	Consider" A producer shall develop a management and employee development plan to create a training structure to enhance the long term prosperity of the Producer and its employees	Economical sustainability aspect (long term prosperity) will be introduced in version 4.0 but yet in an initial stage. Training (criterion 2.7) is included under several other indicators and all enhance employee's knowledge and therefore prosperity.
NGO	Rules about compliance requirement:	The ProTerra Standard distinguishes between CORE indicators and other indicators. To be ProTerra certified, organisations have to comply with CORE indicators to 100% and with all the indicators to 80%. There should be an addition to the rule so as to avoid that all non-CORE indicators that are not complied with are all under the same principle.	Certification rules are detailed in the Certification Protocol, which is not object of this public consultation. Nevertheless, your suggestion will be considered in future discussions associated to the revisions of the Protocol. Please note that every principle has at least one CORE indicator and that under revision 4.0 several indicators have become CORE.
NGO	1.1.5	This should be a CORE requirement.	This requirement will be removed from version 4.0. Indicators are evaluated individually and most are based on legal requirements. Additionally, making this requirement CORE would remove many operators from the ProTerra Scheme and in this way reduce extent of the potential beneficial impact of the implementation of the standard.
NGO	2.5.2	Should be CORE	Will be revised to be considered core. It is relevant in avoiding modern slavery.
NGO	2.7.1	Should be CORE	Will be made CORE

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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NGO	2.9.5	Delete the second part of the guidance as it risk nullifying the indicator. The certification body may allow for the minimum/maximum ages to be lower/higher than 18/60 in cases where national legislation and/or other legal permitting procedures are in effect, and provided there are measures in place to adequately protect the health and safety of such workers.	Second part of the guidance will be deleted.
NGO	2.9.6	Should be core	Will be made CORE. A guidance will be added on the need of training on usage of PPEs.
NGO	2.9.7	Should be CORE	Considering that indicator 2.9.6 will be considered CORE in version 4.0, ProTerra considers it is not necessary to make this indicator also CORE at this stage. It is important to have a balance between CORE and non-CORE indicators to ensure adherence to the Standard and in this way strive improvements.
NGO	2.11	All indicators should be core	ProTerra Considers that it is already CORE the fact that certified organisations shall implement procedures to assure consistent compliance with legal requirements. Maternity leave is in general regulated by national regulations and the indicators 2.11.1 and 2.11.2 just reinforces the need to comply with a legal obligation. They will not be made CORE. As for 2.11.3 considering that there are country's where maternity leave is not regulated, to ensure that woman's rights are protected, the indicator will be made CORE.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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NGO	4.1.1	<p>Principle 4: 4.1.1. Land conversion (page 16): Delete sentence in the guidance:“The cut-off date can be adjusted for specific regions, and can be modified to include compensatory measures for certain limited periods. However, the fundamental principle of the ProTerra Standard is that conversion of native vegetation and HCVAs is not allowed.”.....</p> <p>Comment: This sentence in the guidance is not clear and can lead to misunderstanding. This sentence should be deleted. Use correct terminology HCVA Network should be HCV Resource Network and HCVAs should be HCVs.</p>	Guidance will be rephrased to avoid misunderstanding and terminology will be corrected
NGO	4.2.1	Should be CORE	Considering the need to reinforce ProTerra position in protecting biodiversity this indicator will be considered Core
NGO	4.2.2	Should be CORE	Considering that indicated 4.2.1 will be considered CORE in version 4.0, ProTerra considers it is not necessary to make this indicator additionally CORE at this stage. It is important to have a balance between CORE and non-CORE indicators to ensure adherence to the Standard and in this way strive improvements.
NGO	4.3.1	Should be CORE	To be considered CORE in revision 4.0. Large operations are to be considered as defined at the country level. In the absence of such definition producer must provide to certification body independent and technically sound justification as to the classification of its future operation. Guidance text will be improved.
NGO	6.2.5	Must be CORE	The matter will be considered Core under version 4.0, however not applicable to smallholders (note that in most countries this is a legal compliance issues: operations must meet discharge parameters falling within Principle 1). Please also note that Principle 6 will undergo major modification in order to ensure a more clear approach specially related to hazardous waste management. Under version 4.0 indicator 6.2.5 will correspond to the new 6.1.3 (CORE).

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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NGO	7.1.2	Must be CORE	Water scarcity and water disputes have gained a significant relevance in the last years. This indicator will be considered Core in version 4.0, and not applicable to smallholders.
NGO	9.2.1	9.2.1 – must be CORE and merged with 9.2.3	9.2.1 will be made a CORE requirement under revision 4.0, text and guidance will be reviewed to improve clarity. However, indicators will not merge to allow for a gradual improvement on this topic.
NGO	9.2.3	9.2.3 – merge with 9.2.1	Indicator 9.2.1 (related to opening new areas for cultivation with fire) will be made a CORE requirement under revision 4.0. Making 9.2.3 also CORE at this point is considered unnecessary and can jeopardize implementation of the standard in overall improvement overtime. Indicators will not merge. Under version 4.0 this indicator will be renumbered as 9.2.2.
NGO	9.3.1	9.3 Soil and Crop management/ 9.3.1 Soil and Crop management (page 25): Certified organisations shall define a soil and crop management regime that monitors soil quality, builds soil, enhances fertility and manages pests and diseases. Comment: this indicator should become a CORE indicator.	Will be made CORE (and joined with 9.3.2)

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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NGO	9.6.3	9.6. Reduction of toxic and polluting materials /9.6.3 (page 28) In cases where chemicals included on the lists cited in 9.6.2 can be used legally in the country where agricultural production is conducted, certified organisations shall implement a program of progressive reduction of use over time. In such cases, products exported to countries where said pesticides are not allowed by law shall be tested before export to assure that residue levels are negligible or are, at least, compliant with residue limits set in the country of import. Comment: This indicator should be deleted (this was already proposed in the last standard revision). This indicator is very problematic. It nullifies the intention of 9.6.2 which is CORE. As it will take about 2 years before the new standard will be applied in the field. There have to be a clear time bound plan for a phase out for the in 9.6.2 mentioned list of pesticides. The use of Paraquat (WHO II) and Glyphosate (PAN list 2017) should be prohibited in ProTerra certified soy operations till 2020.	The intention of this indicator is not nullifying 9.6.2 rather it is to recognize reality that exists in many locations where a ban pesticide under WHO is legally authorized in a country. Experience has shown that when a more stringent requirement is established than those set under national regulation the adherence to it is reduced. The approach for ProTerra 4.0 will be different and the indicator will be modified to focus on producers that use a pesticide that is legally authorized in their country for crops that are to be exported to countries that have restrictions to the said pesticide. This indicator will be made CORE. All pesticides in WHO II and PAN list (see indicators 9.6.2, which is CORE) may not be used.
NGO	9.6.4	9.6.4 (page 28) Certified organisations shall use non-chemical weed control methods whenever possible,.... Comment: should become a CORE standard	The indicator is a " whenever possible " therefore it cannot be CORE. Additionally, pesticide usage has many CORE indicators that aim at ensuring that only authorised pesticides are used. Making this indicator CORE would nullify several other indicators such as 9.6.2.
Retailer	1.1.5	1.1.5 this must be a CORE requirement	This requirement will be removed from version 4.0. Indicators are evaluated individually and most are based on legal requirements. Additionally, making this requirement CORE would remove many operators from the ProTerra Scheme and in this way reduce extent of the potential beneficial impact of the implementation of the standard.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	2.5.2	Must be core	Will be revised to be considered core. It is relevant in avoiding modern slavery.
Retailer	2.7.1	Must be core	Will be made CORE
Retailer	2.9.5	2.9.5 delete the second part of the guidance as it risk nullifying the indicator.	Second part of the guidance will be deleted.
Retailer	2.9.6	Must be core	Will be made CORE. A guidance will be added on the need of training on usage of PPEs.
Retailer	2.9.7	Must be core	Considering that indicator 2.9.6 will be considered CORE in version 4.0, ProTerra considers it is not necessary to make this indicator also CORE at this stage. It is important to have a balance between CORE and non-CORE indicators to ensure adherence to the Standard and in this way strive improvements.
Retailer	2,11	All indicators must be core	ProTerra considers that it is already CORE the fact that certified organisations shall implement procedures to assure consistent compliance with legal requirements. Maternity leave is in general regulated by national regulations and the indicators 2.11.1 and 2.11.2 just reinforces the need to comply with a legal obligation. They will not be made CORE. As for 2.11.3 considering that there are country's where maternity leave is not regulated, to ensure that woman's rights are protected, the indicator will be made CORE.
Retailer	4.1.1	4.1.1 a Delete sentence in the Guidance..."The cut off date can be adjusted..." This sentence in the guidance is not clear and can lead to misunderstanding. We recommend to delete this sentences. b. use correct terminology it should be HCV Resource Network and HCVAs should be HCVs.	Guidance will be rephrased to avoid misunderstanding and terminology will be corrected
Retailer	4.2.1	4.2.1 must be CORE.	Considering the need to reinforce ProTerra position in protecting biodiversity this indicator will be considered Core

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	4.2.2	Must be CORE.	Considering that indicated 4.2.1 will be considered CORE in version 4.0, ProTerra considers it is not necessary to make this indicator additionally CORE at this stage. It is important to have a balance between CORE and non-CORE indicators to ensure adherence to the Standard and in this way strive improvements.
Retailer	4.3.1	Must be CORE.	To be considered CORE in revision 4.0. Large operations are to be considered as defined at the country level. In the absence of such definition producer must provide to certification body independent and technically sound justification as to the classification of its future operation. Guidance text will be improved.
Retailer	6.2.5	6.2.5 must be CORE	The matter will be considered Core under version 4.0, however not applicable to smallholders (note that in most countries this is a legal compliance issues: operations must meet discharge parameters falling within Principle 1). Please also note that Principle 6 will undergo major modification in order to ensure a more clear approach specially related to hazardous waste management. Under version 4.0 indicator 6.2.5 will correspond to the new 6.1.3 (CORE).
Retailer	7.1.2	7.1.2 must be CORE	Water scarcity and water disputes have gained a significant relevance in the last years. This indicator will be considered Core in version 4.0, and not applicable to smallholders.
Retailer	9.2.1	Must be core and merge with 9.2.3	9.2.1 will be made a CORE requirement under revision 4.0, text and guidance will be reviewed to improve clarity. However, indicators will not merge to allow for a gradual improvement on this topic.
Retailer	9.2.3	Merge with 9.2.1	Indicator 9.2.1 (related to opening new areas for cultivation with fire) will be made a CORE requirement under revision 4.0. Making 9.2.3 also CORE at this point is considered unnecessary and can jeopardize implementation of the standard in overall improvement overtime. Indicators will not merge. Under version 4.0 this indicator will be renumbered as 9.2.2.
Retailer	9.3.1	Must be core	Will be made CORE (and joined with 9.3.2)

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	9.6.3	The indicator shall be deleted. This indicator is very problematic. It nullifies the intention of 9.6.2 which is core. As it will take about 2 years Before the new standard will be applied in the field.	The intention of this indicator is not nullifying 9.6.2 rather it is to recognize reality that exists in many locations where a ban pesticide under WHO is legally authorized in a country. Experience has shown that when a more stringent requirement is established than those set under national regulation the adherence to it is reduced. The approach for ProTerra 4.0 will be different and the indicator will be modified to focus on producers that use a pesticide that is legally authorized in their country for crops that are to be exported to countries that have restrictions to the said pesticide. This indicator will be made CORE.
Retailer	9.6.4	9.6.4 must be CORE	The indicator is a " whenever possible " therefore it cannot be CORE. Additionally, pesticide usage has many CORE indicators that aim at ensuring that only authorised pesticides are used. Making this indicator CORE would nullify several other indicators such as 9.6.2.
Government	4.1.1	<p>Principle 4.1.1: We encourage that you consider including the High Carbon Stock Approach methodology and toolkit in addition to the High Conservation Value Approach when revising this principle. This could strengthen the principle with regards to protecting secondary forests or other natural high carbon areas not covered by the HCV approach.</p> <p>Transparency: We encourage that you provide openness and transparency into your certification system. Some members of the NGO community say it is challenging to verify the robustness of Proterra certification, due to lack of openness about which farms that have been certified. Openness on producers and traceability is important in order to achieve deforestation-free supply chains, and we encourage your</p>	ProTerra has to evaluate the impact on certification of the potential use of the High Carbon Approach methodology, this will require additional time, beyond the time expected to launch version 4.0. The topic will be considered in future discussions and evaluated. ProTerra Foundation acknowledges the concern with transparency and will strive to improve its governance topic currently not covered under this revision. As to making farm information public we are still understanding potential impacts and requirements related to third party data protection issues.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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		contribution to this. We also encourage you to ensure that ProTerra control and monitoring routines are in line with general international certification standards.	
Food Manufacturer	Principle 3	Addition of FPIC to the standard: Respect the rights of indigenous and local populations and apply the UN principle of free, prior and informed consent (FPIC). No land conflicts. https://www.un.org/development/desa/indigenous-peoples/publications/2016/10/free-prior-and-informed-consent-an-indigenous-peoples-right-and-a-good-practice-for-local-communities-fao/	The UN principle of free, prior and informed consent (FPIC) will be added in version 4.0
Food Manufacturer	4.1	No contribution to deforestation or to the conversion of valuable ecosystems as defined through the HCS / HCV approach (www.hcvnetwork.org/).	Guidance associated 4.1 will be rephrased to avoid misunderstanding. Contribution to deforestation exist to the extent that a premium is paid to those that are certified (in this case those that have not converted land in the recent years).

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Food Manufacturer	Principle 4- Water managed conservatively.	<p>Two enhanced criteria elements:</p> <p>Implementation of measures to protect (ground and surface, seasonal and annual) water bodies: not only on farm level, but also water management in the catchment area. Access to a sufficient quality and quantity of clean water: e.g. availability of valid permits/licenses for all farm water extractions; compliance with all rights for access to drinking water and sanitation for all users and inhabitants of the river basin; avoiding water conflicts.</p> <p>Protect or restore riverbank/shoreline vegetation with native species along water bodies.</p>	<p>The presence, use and operations of several players, including urban developments, impact the catchment area and are outside the control of any single organization. To contribute to the adequate water management at the catchment area in where it is located ProTerra understands that the certified organizations shall observe the requirements of indicators under Principle 7 – Water managed conservatively suffice (please also note that this principle will be subjected to improvements in version 4). These indicators already take in considerations the points put forwards in your comments. Protection and e riverbank/shoreline vegetation restoration is considered under 4.2.1</p>
Food Manufacturer	8- Greenhouse gases	<p>GHG are calculated via standard methodology and public ally reported in one ProTerra GHG database. This will require ProTerra to define the methodology and develop a public tool to enable reporting.</p>	<p>This is currently very difficult to implement but will be further discussed internally. ProTerra will strive to approach GHG calculation organizations and see the best way to interact and advance in this topic. As to version 4.0 of Proterra Standard, guidance in this criterium will be reviewed to include, as a suggestion, a stimulus for certified organizations to practice GHG calculations and to voluntarily make their information public.</p>
Food Manufacturer	9.7- Mgmt of agrochemicals and chemical residues	<p>Minimization of pesticide use and ban of pesticides of category WHO 1a and 1b.</p>	<p>Indicators 9.6.1 (which is CORE) determines that "growers 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", so pesticide minimization is already considered within ProTerra. Additionally, WHO classes 1a, 1b lists, Rotterdam Convention, Stockholm Convention, and PAN international list of highly hazardous pesticides are the key reference sources in pesticide ban within the scope of ProTerra Certification.</p>

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Food Manufacturer	9.3 Soil & Crop Mgmt	Implementation of measures to protect and enhance soils: Soil management, humus build-up, improvement of soil quality and erosion protection, e.g. through techniques to improve or maintain soil structure and avoid soil erosion, deep-rooting green crops, mulching, use low pressure tillage, etc.	This is already considered under ProTerra (refer to all indicators under 9.3)
Food Manufacturer	Governance, accreditation and M&E systems	<p>Ensure independence of bodies governing and controlling the standard and its implementation.</p> <p>Accredit more than one control body for the assurance and certification mechanism</p> <p>Control bodies are approved by independent accreditation bodies and monitored in terms of quality</p> <p>Relevant governance documents (e.g. decision-making processes), audit dates and summary audit reports are publicly available</p> <p>Establishment of a sound monitoring and evaluation system: for reporting on performance and impacts</p>	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for future modifications. It should be noted that several relevant documents are already available at the ProTerra Foundation Web site (such as Terms of Reference of ProTerra Certification Governance Board V1.1 and BYLAWS STICHTING PROTERRA FOUNDATION 2016 among others). Audit reports are currently considered as confidential as they present third party sensitive information and users must adhere to a disclosure scheme.
Retailer	1.1.4	Should be a CORE requirement	Indicator 1.1.4 is already a CORE requirement.
Retailer	2.5.2	Should be a CORE requirement	Will be revised to be considered core. It is relevant in avoiding modern slavery.
Retailer	2.7.1	Should be a CORE requirement	Will be made CORE
Retailer	2.9.6	Should be a CORE requirement	Will be made CORE. A guidance will be added on the need of training on usage of PPEs.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	2.9.7	Should be a CORE requirement	Considering that indicator 2.9.6 will be considered CORE in version 4.0, ProTerra considers it is not necessary to make this indicator also CORE at this stage. It is important to have a balance between CORE and non-CORE indicators to ensure adherence to the Standard and in this way strive improvements.
Retailer	2.11.1	Should be a CORE requirement	ProTerra Considers that it is already CORE the fact that certified organisations shall implement procedures to assure consistent compliance with legal requirements. Maternity leave is in general regulated by national regulations and the indicators 2.11.1 and 2.11.2 just reinforces the need to comply with a legal obligation. They will not be made CORE. As for 2.11.3 considering that there are country's where maternity leave is not regulated, to ensure that woman's rights are protected, the indicator will be made CORE.
Retailer	2.11.3	Should be a CORE requirement	ProTerra Considers that it is already CORE the fact that certified organisations shall implement procedures to assure consistent compliance with legal requirements. Maternity leave is in general regulated by national regulations and the indicators 2.11.1 and 2.11.2 just reinforces the need to comply with a legal obligation. They will not be made CORE. As for 2.11.3 considering that there are country's where maternity leave is not regulated, to ensure that woman's rights are protected, the indicator will be made CORE.
Retailer	4.1.1	Adjust: use correct terminology HCVA Network should be HCV Resource Network and HCVAs should be HCVs. <u>Delete this guidance, which introduces significant loop-holes in the “no land conversion” status of the ProTerra Standard (align with RTRS V3.0 criterion 4.4)</u>	Guidance will be rephrased to avoid misunderstanding and terminology will be corrected
Retailer	4.2.1	Should be a CORE requirement	Considering the need to reinforce ProTerra position in protecting biodiversity this indicator will be considered Core

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	4.3.1	Should be a CORE requirement	To be considered CORE in revision 4.0. Large operations are to be considered as defined at the country level. In the absence of such definition producer must provide to certification body independent and technically sound justification as to the classification of its future operation. Guidance text will be improved.
Retailer	6.2.5	Should be a CORE requirement	The matter will be considered Core under version 4.0, however not applicable to smallholders (note that in most countries this is a legal compliance issues: operations must meet discharge parameters falling within Principle 1). Please also note that Principle 6 will undergo major modification in order to ensure a more clear approach specially related to hazardous waste management. Under version 4.0 indicator 6.2.5 will correspond to the new 6.1.3 (CORE).
Retailer	7.1.2	Should be a CORE requirement	Water scarcity and water disputes have gained a significant relevance in the last years. This indicator will be considered Core in version 4.0, and not applicable to smallholders.
Retailer	9.2.1	Should be a CORE requirement	Will be made a CORE requirement under revision 4.0
Retailer	9.2.3	Merge with 9.2.1	Indicator 9.2.1 (related to opening new areas for cultivation with fire) will be made a CORE requirement under revision 4.0. Making 9.2.3 also CORE at this point is considered unnecessary and can jeopardize implementation of the standard in overall improvement overtime. Indicators will not merge. Under version 4.0 this indicator will be renumbered as 9.2.2.
Retailer	9.3.1	Should be a CORE requirement	Will be made CORE (and joined with 9.3.2)

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	9.6.2	Add: In countries where Paraquat can be used legally in agricultural production, producers are required to implement a program of progressive reduction in Paraquat over time. The implemented Integrated Crop Management Plan (see indicator x.x.x) shall specify reduction targets for Paraquat and its phase out, which shall be implemented as soon as possible and not later than 2020. The use of Paraquat is prohibited from January 2021. Align with RTRS V3.1 indicator 5.6.2. Paraquat is not listed in any of the lists of chemicals referenced in indicator 9.6.2. (Paraquat – also known by the generic name Gramoxone Max or Gramoxone Extra)	Specific reference to Paraquat will be made in indicator 9.6.3, however in the context of exports to countries where the pesticide is banned. Nevertheless it is expected (as part of Principle 1 and indicator 9.6.2) that certified organizations follow up with pesticide ban topics and, based on future updates of the reference sources (WHO classes Ia, Ib and II lists, Rotterdam Convention, Stockholm Convention, and PAN international list of highly hazardous pesticide), plan pesticide substitution in a proactive way.
Retailer	9.6.3	Indicator should absolutely be deleted. The indicator is very problematic. It nullifies the intention of 9.6.2, which is CORE. Align with RTRS V.3.1	The intention of this indicator is not nullifying 9.6.2 rather it is to recognize reality that exists in many locations where a ban pesticide under WHO is legally authorized in a country. Experience has shown that when a more stringent requirement is established than those set under national regulation the adherence to it is reduced. The approach for ProTerra 4.0 will be different and the indicator will be modified to focus on producers that use a pesticide that is legally authorized in their country for crops that are to be exported to countries that have restrictions to the said pesticide. This indicator will be made CORE.
Retailer	Scope of Certification	Level 1 - agriculture: Add: The unit of certification shall be limited to the farm boundaries. This includes fields where soy is cultivated, and also non-soy growing areas, non-cultivated areas, infrastructure and facilities and other areas that form part of the farm. (This requirement should	With respect to farm operations, the scope is currently limited to the farm area but including non-cultivated areas, infrastructure and all activities that occur at the farm. This will be made clear under version 4.0

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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		be specified in certification and accreditation requirements)	
Retailer	Governance & Management	Strive for ISEAL membership. Link: https://www.isealalliance.org	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. Currently there are financial limitation that make ISEAL membership not viable.
Retailer	Governance & Management	Implement a balanced and accessible multi-stakeholder governance, among other things, by means of: <ul style="list-style-type: none"> - Equal representation and voting rights of all stakeholder groups, members of the board and of the standard. The General Assembly, consisting of all members of the standard organized into constituencies, has to decide on all critical issues, such as changes to the standard. - Balanced representation of all interests in the board, organized into constituencies. - Transparent designation of board members, elected by the General Assembly Transparent explanation of voting rights and powers of members and the board.	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. A foundation does not work as a private entity and it is governed by specific regulations that it has to adhere to. ProTerra is seeking to engage with more stakeholders.
Retailer	Governance & Management	Ensure independence of bodies governing and controlling the standard and its implementation	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	Governance & Management	Accredit more than one control body for the assurance and certification mechanism	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews.
Retailer	Governance & Management	Group audits: Random sampling of operations must be structured so that all operations get inspected at least once during a certification cycle (generally five years)	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations and ProTerra is currently reviewing its sampling procedures.
Retailer	Governance & Management	Risk assessment/classification of operations: Determine criteria to determine risk-level of operations (e.g. biodiversity loss, workers' rights, GMO, corruption) and record the procedure in the certification protocol (don't leave the determination to the control body).	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. Currently GMO risk is considered under APPENDIX A: list of commercialized GM crops and their derivatives, of the Standard.
Retailer	Governance & Management	Operations classified as low and medium risk, must be audited by an independent third party regularly (at least once in 5 years), including unannounced audits. Operations classified as high risk, must be audited more frequently and rigorously.	Governance of Proterra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. It is noted that unannounced audits represent additional cost to organizations and can in certain situation be impeditive to the implementation of the Standard.
Retailer	Governance & Management	Unannounced inspections of identified high-risk operations.	Governance of Proterra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. It is noted that unannounced audits represent additional cost to organizations and can in certain situation be impeditive to the implementation of the Standard.
Retailer	Governance & Management	Accreditation process is clearly defined and publicly available.	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	Governance & Management	Control bodies are approved by independent accreditation bodies and monitored in terms of quality.	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews.
Retailer	Governance & Management	Establish segregated non-GMO flows.	We regret to inform that this request is not clear. It should be noted that genetically modified organisms (GMO) and their by-products must not be used in the production of ProTerra certified products, so there is no need of segregated flow. Principle 5 brings requirements associated to system of identity preservation and segregation. Principle 10 relates exclusively to traceable and segregated Chain of Custody. Additionally, it is noted that governance of ProTerra Foundation is not the object of this review process.
Retailer	Governance & Management	Relevant governance documents (e.g. decision-making processes), audit dates and summary audit reports are publicly available.	Governance of ProTerra Foundation is not the object of this review process. It should be noted that several relevant documents are already available at the ProTerra Foundation Web site (such as Terms of Reference of ProTerra Certification Governance Board V1.1 and BYLAWS STICHTING PROTERRA FOUNDATION 2016 among others). Audit reports are currently considered as confidential as they present third party sensitive information and users must adhere to a disclosure scheme.
Retailer	Governance & Management	Establishment of a sound monitoring and evaluation system: for reporting on performance and impacts.	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews.
Retailer	Governance & Management	For Europe: National or at least regional interpretations of the Standard and additional modules (if applicable) of the production standard and audit mechanism for the certification of all operations.	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. Nevertheless, several national interpretations are under discussion and shall be communicated as soon as possible.
Retailer	1.1.4	Should be a CORE requirement	Indicator 1.1.4 is already a CORE requirement.
Retailer	2.5.2	Should be a CORE requirement	Will be revised to be considered core. It is relevant in avoiding modern slavery.
Retailer	2.7.1	Should be a CORE requirement	Will be made CORE
Retailer	2.9.6	Should be a CORE requirement	Will be made CORE. A guidance will be added on the need of training on usage of PPEs.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	2.9.7	Should be a CORE requirement	Considering that indicator 2.9.6 will be considered CORE in version 4.0, ProTerra considers it is not necessary to make this indicator also CORE at this stage. It is important to have a balance between CORE and non-CORE indicators to ensure adherence to the Standard and in this way strive improvements.
Retailer	2.11.1	Should be a CORE requirement	ProTerra Considers that it is already CORE the fact that certified organisations shall implement procedures to assure consistent compliance with legal requirements. Maternity leave is in general regulated by national regulations and the indicators 2.11.1 and 2.11.2 just reinforces the need to comply with a legal obligation. They will not be made CORE. As for 2.11.3 considering that there are country's where maternity leave is not regulated, to ensure that woman's rights are protected, the indicator will be made CORE.
Retailer	2.11.3	Should be a CORE requirement	ProTerra Considers that it is already CORE the fact that certified organisations shall implement procedures to assure consistent compliance with legal requirements. Maternity leave is in general regulated by national regulations and the indicators 2.11.1 and 2.11.2 just reinforces the need to comply with a legal obligation. They will not be made CORE. As for 2.11.3 considering that there are country's where maternity leave is not regulated, to ensure that woman's rights are protected, the indicator will be made CORE.
Retailer	4.1.1	Adjust: use correct terminology HCVA Network should be HCV Resource Network and HCVA's should be HCVs. <u>Delete this guidance, which introduces significant loop-holes in the "no land conversion" status of the ProTerra Standard (align with RTRS V3.0 criterion 4.4)</u>	Guidance will be rephrased to avoid misunderstanding and terminology will be corrected
Retailer	4.2.1	Should be a CORE requirement	Considering the need to reinforce ProTerra position in protecting biodiversity this indicator will be considered Core
Retailer	4.3.1	Should be a CORE requirement	To be considered CORE in revision 4.0. Large operations are to be considered as defined at the country level. In the absence of such definition producer must provide to certification body independent and technically sound justification as to the classification of its future operation. Guidance text will be improved.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	6.2.5	Should be a CORE requirement	The matter will be considered Core under version 4.0, however not applicable to smallholders (note that in most countries this is a legal compliance issues: operations must meet discharge parameters falling within Principle 1). Please also note that Principle 6 will undergo major modification in order to ensure a more clear approach specially related to hazardous waste management. Under version 4.0 indicator 6.2.5 will correspond to the new 6.1.3 (CORE).
Retailer	7.1.2	Should be a CORE requirement	Water scarcity and water disputes have gained a significant relevance in the last years. This indicator will be considered Core in version 4.0, and not applicable to smallholders.
Retailer	9.2.1	Should be a CORE requirement	Will be made a CORE requirement under revision 4.0
Retailer	9.2.3	Merge with 9.2.1	Indicator 9.2.1 (related to opening new areas for cultivation with fire) will be made a CORE requirement under revision 4.0. Making 9.2.3 also CORE at this point is considered unnecessary and can jeopardize implementation of the standard in overall improvement overtime. Indicators will not merge. Under version 4.0 this indicator will be renumbered as 9.2.2.
Retailer	9.3.1	Should be a CORE requirement	Will be made CORE (and joined with 9.3.2)
Retailer	9.6.2	Add: In countries where Paraquat can be used legally in agricultural production, producers are required to implement a program of progressive reduction in Paraquat over time. The implemented Integrated Crop Management Plan (see indicator x.x.x) shall specify reduction targets for Paraquat and its phase out, which shall be implemented as soon as possible and not later than 2020. The use of Paraquat is prohibited from January 2021. Align with RTRS V3.1 indicator 5.6.2. Paraquat is not listed in any of the lists of chemicals referenced in indicator 9.6.2. (Paraquat – also known by the generic name Gramoxone Max or Gramoxone Extra)	Specific reference to Paraquat will be made in indicator 9.6.3, however in the context of exports to countries where the pesticide is banned. Nevertheless it is expected (as part of Principle 1 and indicator 9.6.2) that certified organizations follows up with pesticide ban topics and, based on future updates of the reference sources (WHO classes Ia, Ib and II lists, Rotterdam Convention, Stockholm Convention, and PAN international list of highly hazardous pesticide), plan pesticide substitution in a proactive way.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	9.6.3	Indicator should absolutely be deleted. The indicator is very problematic. It nullifies the intention of 9.6.2, which is CORE. Align with RTRS V.3.1	The intention of this indicator is not nullifying 9.6.2 rather it is to recognize reality that exists in many locations were a ban pesticide under WHO is legally authorized in a country. Experience has shown that when a more stringent requirement is established than those set under national regulation the adherence to it is reduced. The approach for ProTerra 4.0 will be diferent and the indicator will the modified to focus on producers that use a pesticide that is legally authorized in their country for crops that are to be exported to countries that have restrictions to the said pesticide. This indicator will be made CORE.
Retailer	Scope of Certification	Level 1 - agriculture: Add: The unit of certification shall be limited to the farm boundaries. This includes fields where soy is cultivated, and also non-soy growing areas, non-cultivated areas, infrastructure and facilities and other areas that form part of the farm. (This requirement should be specified in certification and accreditation requirements)	With respect to farm operations, the scope is currently limited to the farm area but including non-cultivated areas, infrastructure and all activities that occur at the farm. This will be made clear under version 4.0
Retailer	Governance & Management	Strive for ISEAL membership. Link: https://www.isealalliance.org	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. Currently there are financial limitation that make ISEAL membership not viable.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	Governance & Management	Implement a balanced and accessible multi-stakeholder governance, among other things, by means of: - Equal representation and voting rights of all stakeholder groups, members of the board and of the standard. The General Assembly, consisting of all members of the standard organized into constituencies, has to decide on all critical issues, such as changes to the standard. - Balanced representation of all interests in the board, organized into constituencies. - Transparent designation of board members, elected by the General Assembly Transparent explanation of voting rights and powers of members and the board.	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. A foundation does not work as a private entity and it is governed by specific regulations that it has to adhere to. ProTerra is seeking to engage with more stakeholders.
Retailer	Governance & Management	Ensure independence of bodies governing and controlling the standard and its implementation	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews.
Retailer	Governance & Management	Accredit more than one control body for the assurance and certification mechanism	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews.
Retailer	Governance & Management	Group audits: Random sampling of operations must be structured so that all operations get inspected at least once during a certification cycle (generally five years)	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations and ProTerra is currently reviewing its sampling procedures.
Retailer	Governance & Management	Risk assessment/classification of operations: Determine criteria to determine risk-level of operations (e.g. biodiversity loss, workers' rights, GMO, corruption) and record the procedure in the certification protocol (don't leave the determination to the control body).	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. Currently GMO risk is considered under APPENDIX A: list of commercialized GM crops and their derivatives, of the Standard.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	Governance & Management	Operations classified as low and medium risk, must be audited by an independent third party regularly (at least once in 5 years), including unannounced audits. Operations classified as high risk, must be audited more frequently and rigorously.	Governance of Proterra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. It is noted that unannounced audits represent additional cost to organizations and can in certain situation be impeditive to the implementation of the Standard.
Retailer	Governance & Management	Unannounced inspections of identified high-risk operations.	Governance of Proterra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. It is noted that unannounced audits represent additional cost to organizations and can in certain situation be impeditive to the implementation of the Standard.
Retailer	Governance & Management	Accreditation process is clearly defined and publicly available.	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews.
Retailer	Governance & Management	Control bodies are approved by independent accreditation bodies and monitored in terms of quality.	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews.
Retailer	Governance & Management	Establish segregated non-GMO flows.	We regret to inform that this request is not clear. It should be noted that genetically modified organisms (GMO) and their by-products must not be used in the production of ProTerra certified products, so there is no need of segregated flow. Principle 5 brings requirements associated to system of identity preservation and segregation. Principle 10 relates exclusively to traceable and segregated Chain of Custody. Additionally, it is noted that governance of ProTerra Foundation is not the object of this review process.
Retailer	Governance & Management	Relevant governance documents (e.g. decision-making processes), audit dates and summary audit reports are publicly available.	Governance of ProTerra Foundation is not the object of this review process. It should be noted that several relevant documents are already available at the ProTerra Foundation Web site (such as Terms of Reference of ProTerra Certification Governance Board V1.1 and BYLAWS STICHTING PROTERRA FOUNDATION 2016 among others). Audit reports are currently considered as confidential as they present third party sensitive information and users must adhere to a disclosure scheme.
Retailer	Governance & Management	Establishment of a sound monitoring and evaluation system: for reporting on performance and impacts.	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	Governance & Management	For Europe: National or at least regional interpretations of the Standard and additional modules (if applicable) of the production standard and audit mechanism for the certification of all operations.	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. Nevertheless, several national interpretations are under discussion and shall be communicated as soon as possible.
Producer and industrial processing	2.1.3	How can this be implemented in countries like India, where families work jointly on fields to serve livelihoods? Need for national interpretations! A solution for the gap of labour and income should be provided as very often families rely on each family member, especially small farmers.	This indicator is just applicable if there is a work contract in place. It is not applicable to family agriculture. This will be made clear in version 4.0 of the Standard. National interpretations are being discussed and will be communicated as soon as they are completed.
Producer and industrial processing	2.2.1	Related to 2.1.3, in peak seasons and especially for small farmers this regulation is difficult to comply with. For small farmers alternative solutions shall be provided without jeopardizing their existence.	Guidance under 2.2.3 indicates that "the work time limits are flexible in that it is recognized 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". It will be clarified in the introduction of version 4.0 what indicators apply or not to small family holders. Additionally where agreements with Union exists these will be respected ("collective agreements and agreements with Labour Unions take precedence over the working hours determined by law").
Producer and industrial processing	2.6.1	E.g. in India, at farm the laborers are daily wage earner and do not have any legal contract with the farm owner. As per requirement they are called upon at the field for the required task. So on the farmer field there is no such arrangement available. This is practiced at plant location for all staff.	ProTerra will include text to this the indicator to permit flexibility considering the cultural context of the different locations limited to smallholders/family farm.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Producer and industrial processing	2.8.1	Please see comment 2.6.1	Payment must be fair and locally representative and shall at least meet the typical salaries usually paid in that region for the equivalent function or job.
Producer and industrial processing	2.8.3	Please see comment 2.6.2	Payment must be fair and locally representative and shall at least meet the typical salaries usually paid in that region for the equivalent function or job.
Producer and industrial processing	2.9.5	<p>The differentiation of the age and professional trained personal is challenging for small farmers in rural areas. In developing countries farmers are sometimes not able to read declarations of the inputs if not translated in their language. Sometimes they are not able to read at all. So if the aim is to include all farmers and provide market chance for poor farmers as well, setting only requirements is not the adequate solution.</p> <p>How can standards like ProTerra encourage farmer groups in rural areas? For e.g. by supporting local organizations which train the farmers according to ProTerra requirements. Setting incentives / financial compensation for farmers who commit with requirements.</p>	ProTerra encourage farmer groups in rural areas by giving them the possibility of additional financial gains for having a certified culture and by providing the basis for the sustainability of their family business over time. In the guidance of this indicator it will be clarified that it applies to employees.
Producer and industrial processing	2.9.6	Trainings for PPE's shall be provided but it would be more realistic if other institutions would be accepted as well. E.g. Universities or farmer associations	There is no restriction under ProTerra on who and what resources are used to provide training on PPE usage. A guidance will be added on the need of training on usage of PPEs.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Producer and industrial processing	3.2.2	In many developing countries documents which represent the evidence of the land owner are available. Often the land is split and cultivated under oral sub contracts to other farmers. Thus, only the evidence of the land owner is feasible in certain countries	3.2.2 is a CORE requirements and relates to land rights disputes being resolved before certified status can be awarded. Certified organisations shall demonstrate title to land in accordance with national practice and law. As per indicator 1.1.4 guidance: examples of land title are ownership deed, lease, or other appropriate legal agreement. Please note however that having title to land does not imply in no ongoing dispute and that dispute itself is the issues under consideration. Eventual disputes have to be evaluated on a case to case basis by the Certification Body. This indicator, under version 4.0, will incorporate the UN Principle of free, prior and informed consent (FPIC).
Producer and industrial processing	5.1.1	Difficulties for small farmers to get access to non GM seeds if markets provide only GM-seed material. The only solution is to provide own seeds which goes along with considerable extra efforts in the upstream supply chains.	ProTerra certification is for GMO free products. ProTerra Foundation strives to promote the production of non-GMO seeds. Extra effort by producers is to be compensated by the market mechanisms.
Producer and industrial processing	6.3.1	Managing in developing countries the inputs on the field is challenging because small farmers seldom take records and aim for high yields. In order to control inputs farmers should get access to best practice seminars and programs / management support to keep records.	ProTerra is favourable of small farmers getting access to best practice seminars and programs. These initiatives can be promoted by the supply chain actors and consumer and ProTerra will support all initiatives in this regard (however note that item 6.3.1 refers to " water, soil, pests, fertilization and irrigation shall be managed such that surface and groundwater and other water supplies are not further contaminated").

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Public Consultation held from 19 February to 20 April, 2018

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Producer and industrial processing	9.7.6	<p>Suggestion: Pesticides listed in the WHO class Ia and Rotterdam Convention, Stockholm Convention, as well as pesticides forbidden by local, national and regional law may not be used in agricultural or industrial operations.</p> <p>Only pesticides approved by responsible authorities or national legislation on plant protection will be tolerated.</p> <p>In cases where chemicals were applied, especially pesticides listed in the WHO classes Ib and II have to be documented each year. Alternatively the toxicity of chemicals containing active ingredients classified as WHO 1b and 2 chemicals only should be assessed for the whole formulation and following the notes on page 7 of the WHO Classification of Pesticides – meaning it has to be referred to the manufacturer's toxicity data.</p>	<p>WHO classes Ia, Ib and II lists, Rotterdam Convention, Stockholm Convention, and PAN international list of highly hazardous pesticides are the key reference sources in pesticide ban worldwide. Accepting pesticide listed in WHO Classes Ib and II, even if documented would be moving backwards and not improving the management (and use) of agrochemicals and chemical residues.</p>
Producer and industrial processing	Principle 4	<p>Suggestion to replace by the application of monitoring tools, e.g. 'GRAS'</p>	<p>Monitoring is fundamental to provided evidence that the requirements under principle 4 are met. ProTerra understands that it is not a matter of replacing the principle, rather understanding the relation of it with the need of monitoring. Each producer and the industry are free to use the monitoring tool they consider adequate to their reality. In Brazil there are several tools such as those found in www.florestal.gov.br/atlas.</p>

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Food Manufacturer	Outgrowers (small farmers)	Standard is not clear in the Principles' requirements for smallholder farmers – sometimes out growers have expressed that it is a challenge to transfer them to individual fields/ Inability to improve practices in the field and/or how to do so/ Inability to collect information (records) – is it possible to set a baseline that smallholder farmers should be expected to collect?	For smallholder farmers a note will be added to clearly indicate all indicators that apply /do not apply to them (in this case a small farmer is a entity under certification). Setting a Baseline is not possible as reality is significantly different in the different countries and crops where ProTerra is used.
Food Manufacturer	2.2	Because of the nature of the agricultural industry and specifically sugarcane, I consider important that there is more flexibility with respect to overtime. With respect to the sugarcane industry, generally speaking, workers work for 4 – 5 months every year; thus, they try to make as much money as they can within that short period of time. While I am not suggesting allowing an unlimited amount of OT but, perhaps the standard could increase the 12 hours per week.	Indicator 2.2.3 establishes that "overtime in excess of 12 hours is only allowable if it happens in extraordinary, limited periods where there are time constraints or risk of economic loss and where conditions regarding overtime in excess of 12 hours have been agreed between workers and management". It will be clarified that, with respect to this criterion where agreements with unions exist, these will be respected.
Food Manufacturer	2.9.1	It is crucial that workers in the fields are required to wear PPE. However, when we talk about smallholders, it is unrealistic to demand they have management systems and/or a safety program in place describing their policies and procedures. Alternatively, it would be more feasible to require them to show a list of PPE they use for the tasks they perform and audit them against that and ensuring such PPE meets all the needs and it's appropriate (and it's in compliance with local laws and regulations, if any).	As indicated in the guidance of 2.9.1 the scope and complexity of the worker health and safety program shall be proportional to the scope and complexity of the certified organisation. In the case of smallholders, this responsibility lies with farmer groups, co-operatives or first processors, where applicable. The way the audit runs and the type of evidence accepted is to the description of the CB. It should be noted that under version 4.0 indicator 2.9.1 will be integrated to 2.9.2.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Food Manufacturer	2.9.2	Performance of a risk assessment – generally, smallholders do not have the capacity to implement these types of assessments. However, in line with the previous bullet point, perhaps smallholders could be assessed based on a list of H&S practices they implement while performing their tasks and ensure those meet minimum requirements.	As per guidance associated to this indicator it is not applicable to smallholders, or farms with no employees.
Food Manufacturer	2.9.4	Keep Health & Safety records for a small family owned operation is also a big challenge. In many occasions, we deal with people that are illiterate and are unable to understand simple reading.	As per guidance associated to this indicator it is not applicable to smallholders, or farms with no employees.
Food Manufacturer	4.3.1	In the past, we have had a lot of requests regarding further explanation with respect to the SEIA. There is some confusion with respect to the requirements/information a SEIA must to comply with/include.	Version 4.0 will strive to clarify the definition of Environmental and Social Impact Assessment (ESIA)
Food Manufacturer		Chain of Custody - for mills aiming towards certification, further detailed information regarding the CoC process should be included in the Standard. A chart including the different processes would be helpful.	Version 4.0 will strive to clarify the explanation of the Chain of Custody system
Retailer	1.1.4	Should be a CORE requirement	Indicator 1.1.4 is already a CORE requirement.
Retailer	2.5.2	Should be a CORE requirement	Will be revised to be considered core. It is relevant in avoiding modern slavery.
Retailer	2.7.1	Should be a CORE requirement	Will be made CORE
Retailer	2.9.6	Should be a CORE requirement	Will be made CORE. A guidance will be added on the need of training on usage of PPEs.
Retailer	2.9.7	Should be a CORE requirement	Considering that indicator 2.9.6 will be considered CORE in version 4.0, ProTerra considers it is not necessary to make this indicator also CORE at this stage. It is important to have a balance between CORE and non-CORE indicators to ensure adherence to the Standard and in this way strive improvements.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

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Retailer	2.11.1	Should be a CORE requirement	ProTerra Considers that it is already CORE the fact that certified organisations shall implement procedures to assure consistent compliance with legal requirements. Maternity leave is in general regulated by national regulations and the indicators 2.11.1 and 2.11.2 just reinforces the need to comply with a legal obligation. They will not be made CORE. As for 2.11.3 considering that there are country's where maternity leave is not regulated, to ensure that woman's rights are protected, the indicator will be made CORE.
Retailer	2.11.3	Should be a CORE requirement	ProTerra Considers that it is already CORE the fact that certified organisations shall implement procedures to assure consistent compliance with legal requirements. Maternity leave is in general regulated by national regulations and the indicators 2.11.1 and 2.11.2 just reinforces the need to comply with a legal obligation. They will not be made CORE. As for 2.11.3 considering that there are country's where maternity leave is not regulated, to ensure that woman's rights are protected, the indicator will be made CORE.
Retailer	4.1.1	Adjust: use correct terminology HCVA Network should be HCV Resource Network and HCVAs should be HCVs. <u>Delete this guidance, which introduces significant loop-holes in the “no land conversion” status of the ProTerra Standard (align with RTRS V3.0 criterion 4.4)</u>	Guidance will be rephrased to avoid misunderstanding and terminology will be corrected
Retailer	4.2.1	Should be a CORE requirement	Considering the need to reinforce ProTerra position in protecting biodiversity this indicator will be considered Core
Retailer	4.3.1	Should be a CORE requirement	To be considered CORE in revision 4.0. Large operations are to be considered as defined at the country level. In the absence of such definition producer must provide to certification body independent and technically sound justification as to the classification of its future operation. Guidance text will be improved.

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Retailer	6.2.5	Should be a CORE requirement	The matter will be considered Core under version 4.0, however not applicable to smallholders (note that in most countries this is a legal compliance issues: operations must meet discharge parameters falling within Principle 1). Please also note that Principle 6 will undergo major modification in order to ensure a more clear approach specially related to hazardous waste management. Under version 4.0 indicator 6.2.5 will correspond to the new 6.1.3 (CORE).
Retailer	7.1.2	Should be a CORE requirement	Water scarcity and water disputes have gained a significant relevance in the last years. This indicator will be considered Core in version 4.0, and not applicable to smallholders.
Retailer	9.2.1	Should be a CORE requirement	Will be made a CORE requirement under revision 4.0.
Retailer	9.2.3	Merge with 9.2.1	Indicator 9.2.1 (related to opening new areas for cultivation with fire) will be made a CORE requirement under revision 4.0. Making 9.2.3 also CORE at this point is considered unnecessary and can jeopardize implementation of the standard in overall improvement overtime. Indicators will not merge. Under version 4.0 this indicator will be renumbered as 9.2.2.
Retailer	9.3.1	Should be a CORE requirement	Will be made CORE (and joined with 9.3.2)
Retailer	9.6.2	Add: In countries where Paraquat can be used legally in agricultural production, producers are required to implement a program of progressive reduction in Paraquat over time. The implemented Integrated Crop Management Plan (see indicator x.x.x) shall specify reduction targets for Paraquat and its phase out, which shall be implemented as soon as possible and not later than 2020. The use of Paraquat is prohibited from January 2021. Align with RTRS V3.1 indicator 5.6.2. Paraquat is not listed in any of the lists of chemicals referenced in indicator 9.6.2. (Paraquat – also known by the generic name Gramoxone Max or Gramoxone Extra)	Specific reference to Paraquat will be made in indicator 9.6.3, however in the context of exports to countries where the pesticide is banned. Nevertheless it is expected (as part of Principle 1 and indicator 9.6.2) that certified organizations follows up with pesticide ban topics and, based on future updates of the reference sources (WHO classes Ia, Ib and II lists, Rotterdam Convention, Stockholm Convention, and PAN international list of highly hazardous pesticide), plan pesticide substitution in a proactive way.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	9.6.3	Indicator should absolutely be deleted. The indicator is very problematic. It nullifies the intention of 9.6.2, which is CORE. Align with RTRS V.3.1	The intention of this indicator is not nullifying 9.6.2 rather it is to recognize reality that exists in many locations where a ban pesticide under WHO is legally authorized in a country. Experience has shown that when a more stringent requirement is established than those set under national regulation the adherence to it is reduced. The approach for ProTerra 4.0 will be different and the indicator will be modified to focus on producers that use a pesticide that is legally authorized in their country for crops that are to be exported to countries that have restrictions to the said pesticide. This indicator will be made CORE.
Retailer	Scope of Certification	Level 1 - agriculture: Add: The unit of certification shall be limited to the farm boundaries. This includes fields where soy is cultivated, and also non-soy growing areas, non-cultivated areas, infrastructure and facilities and other areas that form part of the farm. (This requirement should be specified in certification and accreditation requirements)	With respect to farm operations, the scope is currently limited to the farm area but including non-cultivated areas, infrastructure and all activities that occur at the farm. This will be made clear under version 4.0
Retailer	Governance & Management	Strive for ISEAL membership. Link: https://www.isealalliance.org	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. Currently there are financial limitations that make ISEAL membership not viable.

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Retailer	Governance & Management	Implement a balanced and accessible multi-stakeholder governance, among other things, by means of: - Equal representation and voting rights of all stakeholder groups, members of the board and of the standard. The General Assembly, consisting of all members of the standard organized into constituencies, has to decide on all critical issues, such as changes to the standard. - Balanced representation of all interests in the board, organized into constituencies. - Transparent designation of board members, elected by the General Assembly Transparent explanation of voting rights and powers of members and the board.	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. A foundation does not work as a private entity and it is governed by specific regulations that it has to adhere to. ProTerra is seeking to engage with more stakeholders.
Retailer	Governance & Management	Ensure independence of bodies governing and controlling the standard and its implementation	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews.
Retailer	Governance & Management	Accredit more than one control body for the assurance and certification mechanism	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews.
Retailer	Governance & Management	Group audits: Random sampling of operations must be structured so that all operations get inspected at least once during a certification cycle (generally five years)	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations and ProTerra is currently reviewing its sampling procedures.
Retailer	Governance & Management	Risk assessment/classification of operations: Determine criteria to determine risk-level of operations (e.g. biodiversity loss, workers' rights, GMO, corruption) and record the procedure in the certification protocol (don't leave the determination to the control body).	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. Currently GMO risk is considered under APPENDIX A: list of commercialized GM crops and their derivatives, of the Standard.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	Governance & Management	Operations classified as low and medium risk, must be audited by an independent third party regularly (at least once in 5 years), including unannounced audits. Operations classified as high risk, must be audited more frequently and rigorously.	Governance of Proterra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. It is noted that unannounced audits represent additional cost to organizations and can in certain situation be impeditive to the implementation of the Standard.
Retailer	Governance & Management	Unannounced inspections of identified high-risk operations.	Governance of Proterra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. It is noted that unannounced audits represent additional cost to organizations and can in certain situation be impeditive to the implementation of the Standard.
Retailer	Governance & Management	Accreditation process is clearly defined and publicly available.	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews.
Retailer	Governance & Management	Control bodies are approved by independent accreditation bodies and monitored in terms of quality.	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews.
Retailer	Governance & Management	Establish segregated non-GMO flows.	We regret to inform that this request is not clear. It should be noted that genetically modified organisms (GMO) and their by-products must not be used in the production of ProTerra certified products, so there is no need of segregated flow. Principle 5 brings requirements associated to system of identity preservation and segregation. Principle 10 relates exclusively to traceable and segregated Chain of Custody. Additionally, it is noted that governance of ProTerra Foundation is not the object of this review process.
Retailer	Governance & Management	Relevant governance documents (e.g. decision-making processes), audit dates and summary audit reports are publicly available.	Governance of ProTerra Foundation is not the object of this review process. It should be noted that several relevant documents are already available at the ProTerra Foundation Web site (such as Terms of Reference of ProTerra Certification Governance Board V1.1 and BYLAWS STICHTING PROTERRA FOUNDATION 2016 among others). Audit reports are currently considered as confidential as they present third party sensitive information and users must adhere to a disclosure scheme.
Retailer	Governance & Management	Establishment of a sound monitoring and evaluation system: for reporting on performance and impacts.	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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Retailer	Governance & Management	For Europe: National or at least regional interpretations of the Standard and additional modules (if applicable) of the production standard and audit mechanism for the certification of all operations.	Governance of ProTerra Foundation is not the object of this review process, nevertheless the suggestions will be taken in considerations for next reviews. Nevertheless, several national interpretations are under discussion and shall be communicated as soon as possible.
Producer and industrial processing	4.1.1	De maneira geral, nossa principal consideração é a respeito da mudança da data de corte de 2004 para 2008. Áreas de campo naturais (lavrados), não se enquadrariam em nenhuma dessas tipologias. o indicador descreve “vegetação nativa e outras áreas (...)” e cita alguns tipos de vegetação, entendendo dar abertura para interpretação de algum tipo de vegetação poderia ter a conversão, por exemplo, os campos naturais (lavrados de Roraima), não sei se seria o caso de deixar claro que não podem ser aberta em hipótese alguma ou descrever algumas exceções como áreas não florestais.	ProTerra will revise the cut date to 2008 to align with other standards. Guidance will be improved to avoid misunderstanding
Producer and industrial processing	2.7.2	As organizações certificadas devem fornecer a todos os trabalhadores treinamentos relacionados a: (a) sustentabilidade; (b) OGM, onde aplicável; (c) sua função e tarefas específicas e responsabilidades. Não especificar os treinamentos	The reference to the specific training will be removed. Examples of training will be provided in the guidance as a suggestion.
Producer and industrial processing	2.9.4	A organização certificada deve monitorar e garantir a conformidade com o programa de saúde e segurança do seu empregado, e manter registros dos índices de saúde e segurança, incluindo estatísticas de acidentes nas operações. Orientação: Estatísticas de acidentes: acidentes	As per the guidance associated to this indicator it is not applicable to smallholders, or farms with no employees. Establishing accident statistics are a very common practice in the industry. In Brazil one can refer to ABNT Standards or Fundacentro for guidance in matter.

ProTerra Public Consultation Outcome – Summary of comments receive and Responses

Public Consultation held from 19 February to 20 April, 2018

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		por hora trabalhada e acidentes por empregado. Complicado conseguir estatística por hora trabalhada.	
Producer and industrial processing	2.9.5	2.9.5 Orientação: A operação deve manter documentação identificando os empregados excluídos dessas atividades e solicitar aos subcontratados para fazerem o mesmo. Como evidenciar que o subcontrato tenha documentos identificando os empregados excluídos?	There are several ways to demonstrate compliance with this indicator, most considered reasonably straight forward and common business practice. ProTerra Foundation is not engaged in providing consulting advice. Certified organization should request for support from specialized companies or, in a limited extent, to its CB.
Producer and industrial processing	9.7.2	9.7.2 Orientação: Os agrotóxicos não devem ser pulverizados dentro de um raio de 100 metros de áreas com população humana, e de 50 metros de corpos de água. Acrescentar na orientação: "ou de acordo com a regulamentação local, regional ou nacional"	Guidance will be rephrased to indicate that " pesticides shall be sprayed as per rules of local regulations. In the absence of such regulations, pesticides shall not be sprayed within 100 meters of human populated areas and shall not be sprayed within 50 meters of bodies of water". This will be a CORE indicator under version 4.0.
Producer and industrial processing	4.13	4.1.3 BÁSICO - Em certas circunstâncias limitadas em regiões específicas, medidas para compensar HCVA's abertas entre 1994 e 2004 devem ser usadas para expandir o indicador 4.1.1. Não fica claro "certas circunstâncias limitadas em regiões específicas"	This reference will be removed as this is an obsolete information (Basel Criteria that expired in 2008)

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Producer and industrial processing	8.1.1	8.1.1 BÁSICO - As organizações certificadas devem monitorar e reduzir as emissões de gases de efeito estufa, tais como dióxido de carbono, metano, óxidos de nitrogênio e de enxofre, etc., e observar as restrições e limites, de maneira a minimizar os impactos nas mudanças climáticas. Orientação: Isto é alcançado através da gestão eficaz de energia, solo, fertilizantes, biodiversidade nativa e outras práticas. Item muito importante, contudo, ainda muito difícil de ser auditado.	ProTerra Foundation acknowledges the challenges associated to this indicator as well as its importance and will foster that this indicator is implemented in practice.
Producer and industrial processing	8.2.1	8.2.1 As organizações certificadas devem adotar práticas para minimizar o uso de energia, especialmente de fontes não renováveis, para obter uma proporção crescente da sua energia de fontes renováveis, tais como solar, eólica ou de materiais reciclados locais. Na prática ainda não acontece.	ProTerra Foundation acknowledges the challenges associated to this indicator as well as its importance and will foster that this indicator is implemented in practice.
Producer and industrial processing	9.7.5	9.7.5 Os residentes dentro de um raio de 1 km devem ser avisados com um dia de antecedência da realização de pulverização aérea. Na prática ainda não acontece.	ProTerra Foundation acknowledges the challenges associated to this indicator as well as its importance and will foster that this indicator is duly implemented.