

OUTCOME OF THE PUBLIC CONSULTATION OF THE MONITORING AND VERIFICATION STANDARD



19-09-2023



Suggestion / consideration	ProTerra Answer
<p>"A 'ProTerra Foundation Monitoring, Report and Verification Guidance' document is referenced several times. We could not be sure if this 'guidance document' is a separate document (we thought it could be) which had not been shared, or, if you are referring to the 'MRV Standard' document as this is referred to as both the Standard and Guidance. Examples of why we assumed this include:</p> <ul style="list-style-type: none"> - References are made to a section / annex 6.2 which does not exist p.4, p.10. - In the Sustainability Checklist it states to 'Refer to item 3.4 of the ProTerra Foundation Monitoring and Verification Guidance' with regards to requirements on traceability/chain of custody. The 3.4 section is not relevant to CoC so can assume you are referring to another guidance document. <p>If there isn't a Guidance document which exists we propose that the MRV document is referred to as the 'MRV Standard' consistently or 'MRV Guidance' consistently to avoid confusion and that the references to the sections are checked again please."</p>	<p>ProTerra Foundation Monitoring, Report and Verification Guidance and the MRV Guidance are the same thing. Based on the set of feedback, MRV received the documents will be integrated and significantly revised to avoid misinterpretation. Wording will also be adjusted and improved. The wrong cross references will be corrected.</p>
<p>"Is the Standard a standalone MRV certification system/process or is it building on the existing ProTerra certification standard? I.e. If it is building on the current certification, does this mean that only ProTerra certified organisations/suppliers will be eligible for MRV/DCF certification? This needs to be clearer in the document. If this is building on existing standard, how will this be implemented against the standard?"</p>	<p>It is a total independent Standard from the existing ProTerra Sustainability Standard. One does not relate or exclude the other.</p>
<p>"It is quite interesting that Proterra is adopting a risk based approach to inform monitoring, this is quite aligned with Proforest's approach. However:</p> <ol style="list-style-type: none"> 1. The definition of low must be defined by Proterra or at least general principles for risk classification. 2. Clarify how this information can be used - if sourcing area is low risk, volumes can be claimed DCF? 3. Important to add that traceability to a sourcing area needs to be verified in order to make DCF claims." 	<p>Based on the set of feedback, MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. MRV is a management system Standard, so it is not prescriptive. The risk will be defined by the economic operator and confirmed if reasonable by the Certification Body. Guidance has been added on what to consider when defining risk.</p>

<p>Doesn't seem to be clear linkages with international conventions which would be worth including. UN Guiding Principles, ILO Human Rights etc. This point was referenced in the minimum requirements (characteristics of DCF) section of the Standard and the Sustainability Monitoring checklist.</p>	<p>Based on the set of feedback, MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. At this point of its development MRV target is to align with FEFAC guidelines and not EU regulations as MRV is not limited to the EU market.</p>
<p>"Remediation in some form is mentioned in the MRV Standard a couple of times: under "Indirect Sourcing areas where there is a high risk" <i>"Where weaknesses or non-compliances are detected, monitoring time-bound supplier implementation plans aimed at addressing the problems and providing any necessary remediation."</i> and under 4.2.1.5 Indirect Sourcing - Monitoring of intermediaries/indirect suppliers" <i>"Developing procedures to identify and address non-compliances, for example, indirect suppliers with deforestation after August 2020"</i> "This gives room for the organisation to be the driving force behind what level of remediation should occur in the event of non-compliance.</p> <p>ProTerra also mentions in the auditing document that in the case of non-conformities, a corrective action plan is to be agreed upon between the audited organisation and the ProTerra Foundation for the verification of engagement and implementation of actions to achieve compliance. More guidance on remediation is needed. How will the auditor certify that the 'necessary remediation' is in place? Proforest supports the addition of remediation and action plans to the MRV Standard, but just want more guidance."</p>	<p>Based on the set of feedback, MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. The term remediation is no more used to avoid confusion. MRV is actually focusing on corrective actions for non-compliance identified. The auditors are qualified professionals with background on environmental and social matters and are therefore considered capable to assess if a corrective action is reasonable or not.</p>
<p>The wording of monitoring system always refers to 'blocked suppliers' and it is not so aligned with 'identify, monitor and respond to actual/potential risk etc..' or not really explicit reference to 're-entry' routes for suppliers. A process diagram would be good for this.</p>	<p>Based on the feedback, MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. New wording for this topic will be "economic operators are expected to block non-compliant suppliers and subsequently support these suppliers to become compliant". Block is in the sense of clearly communication the product of that supplier is not MRV compliant.</p>

<p>Proterra needs to explain how the 'MRV standards' are connected with the Proterra Standard Social Responsibility and Environmental Sustainability (Version 4.1 September 25, 2019). For example, refer to FSC model re-links between FSC COC certification (FSC-STD-40-004 Chain of Custody Certification) and the 2 FSC Controlled Wood standards (FSC Controlled Wood Standard for Forest Management Enterprises FSC-STD-30-010 V2-1, Requirements for Sourcing FSC Controlled Wood FSC-STD-40-005 V3-0).</p>	<p>MRV Standard is not linked to the ProTerra Standard Social Responsibility and Environmental Sustainability (Version 4.1 September 25, 2019). They are two separate and independent Standards.</p>
<p>"The Standard is missing a Quality Management section which should cover but not limited to:</p> <ul style="list-style-type: none"> - Procedures requirements covering all the applicable elements specified in the standard. - Person (or position) responsible for implementing procedures. - Stakeholder consultation procedures if this is a requirement for the implementation of the standard. - How to supply MRV materials (sales, purchases). 	<p>Based on the set of feedback, MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid mis understanding. Based on the new structure of MRV, reference to specific procedures have been included (based on a management approach). Quality management is not the focus of the Standard however.</p>
<p>Clarify what is the normative and what is the informative in these documents: this will facilitate the works of the auditors</p>	<p>Based on the set of feedback, MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid mis understanding.</p>
<p>"The Proforest team could not find any references with regards to what DCF claims the organisation/producer can make based on the MRV Standard. We would be curious to understand Proterra's thinking on this. MVR products – can they claim this is deforestation free? DCF? Compliant with EUDR (recognising the challenge of ensuring compliance with regulation)".</p>	<p>The claims are limited to compliance with the MRV Standard requirements. MRV is not intended exclusively for the EU Market. Several elements of EUDR are however included such as legal compliance, compatible cut-off date and definition of deforestations.</p>
<p>Please provide the objective and scope for the Standard.</p>	<p>Based on the set of feedback, MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. This issue is discussed on the new item 2.0.</p>

<p>"Please clarify the unit of certification. An example of this includes: 4.3 Monitoring of a sourcing area for deforestation, conversion, and protection of ecosystems" <i>"In some cases, the monitoring of specific production units or processing facilities may not be possible or may not be necessary."</i> "The document mentions farm and here it mentions production unit, without defining it. While EUDR uses term plot of land, usual scope of certifications as well as national legislation (like Forest Code) is the farm, so clarification is necessary."</p>	<p>ProTerra MRV is applicable to all economic operators who are engaged in the purchase, commercialisation, or storage of agricultural commodities or their products. Any agricultural commodity and related products can be included in the scope of a specific MRV Verification. The MRV is a verification of the economic operator's management system associated with the supply chain of agricultural commodities and related products.</p>
<p>What evidence will be checked for compliance. It would be important to explain this further. The current guidance leaves too much to be determined by the organisation.</p>	<p>Please check ANNEX A – Sampling of suppliers and ANNEX B – Verification Protocol. The certification is based exclusively on third party audits of duly qualified and technical experiences auditors.</p>
<p>A definition of negligible would be helpful to have in the Standard and what ProTerra considers/determines as negligible risk or what you are basing your definition off to understand the direction of guidance better. Or would you refer to EUDR definition for this, if so it will be good to explicitly state.</p>	<p>The term risk and its classification will be defined by the economic operator and confirmed if reasonable by the Certification Body. Guidance has been added on what to consider when defining risk. Once the EU presents detail definition of negligible risk this may (or not) be adopted in a future revision. The focus of MRV is not exclusively the EU market.</p>
<p>Would be good for ProTerra to define objectives at minimum companies should include in the code of conduct.</p>	<p>These are listed in item 2 of the Guidelines: 2 Commitment of Companies/ Will add more clarity to the text. In the revised MRV version this text can be found under item 1. introduction.</p>
<p>Can you clarify what you mean by implementation/verification by 2021 and 2022. Usually, certifications have a cut-off date and at the time of audit, it is verified compliance with that cut-off date. By adding a target dates, this would mean that companies need to prove they have been 100% compliant since their target date. As we are not far from 2021/2022, this might look reasonable now, but considering a company that wants to get MRV certified in 2025 or later, will they be able to demonstrate compliance since 2021?</p>	<p>This was removed. Cut-off date has been reset to 31 December 2020 or earlier if required by local regulations.</p>
<p>The cut-off date is 2020 but this does not align with the Proterra certification itself, so how would this work in practice?</p>	<p>There is no relation between both Standards. Under MRV the cut date has been reset to 31 December 2020 or earlier if required by local regulations.</p>

<p>The inclusion of the additional 2021/22 cut-off dates do not align with EU Deforestation Free Regulations which explicitly state the cut off date for all suppliers as December 2020. I think as a team we were curious to understand what companies would do to manage this and it was an area some guidance would be welcomed on. We assume all companies will focus on deforestation-free in the immediate term.</p>	<p>Under MRV the cut date has been reset to 31 December 2020 or earlier if required by local regulations. Please refer to new indicator 3.10. For all indirect suppliers for which the economic operator does not have traceability information, the economic operator shall define an action plan to work with these suppliers to bring them to a traceable level in the medium term (3 to 5 years from the initial verification). Lots of non-compliant commodities and/or related products of ProTerra MRV verified companies must be clearly identified as such and this information should be passed on to potential buyers down the supply chain. The focus is not exclusively on EU regulations.</p>
<p>We'd like to note this is another point Proforest embraces, a 'progressing to DCF' is also highlighted in CGF Soy Guidance. If this is similar to what ProTerra is aiming/highlighting here, further guidance on the process would be welcome. For DCF Proforest recognises this is a bigger discussion to consider as an industry with a focus on further alignment.</p>	<p>Based on the set of feedback, MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding.</p>
<p>The definition for the conversion of land should also be included here. A good explanation of it seems to be included in the paragraph above in the Cut-off dates section, but generally it is very broadly spoken about, so it would be great to have further clarity.</p>	<p>Based on the feedback, MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. A section on definitions has been up graded.</p>
<p>In this section the Proforest team felt there were limited details particularly in reference to criteria and the outlining of specific indicators.</p>	<p>Based on the set of feedback, MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding.</p>

<p>What commodities does the Standard cover? This is the only reference to multiple commodities. It would be good to have some clarification in the document. As it is geared towards EUDR and other legislative requirements emerging, we had assumed it was Soy, but perhaps are wrong?</p>	<p>MRV is not created based on EUDR and other EU legislative requirements emerging. It can be applied to any crop in any location focussing on deforestation free commodities produced respecting human rights. This will be reinforced in the revised text.</p>
<p>It is great that the Standard explicitly states the monitoring system must cover all operations.</p>	<p>Noted.</p>
<p>It would be good to define how this information (farm-level traceability) is used somewhere in the standard.</p>	<p>Based on received feedback, the MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. ProTerra Foundation understands this issue is now clear in the final version.</p>
<p>Is the sustainable sourcing policy referred to here another document requirement i.e in addition to the supplier code of conduct and DCF sourcing policy. Or, is this referencing the DCF sourcing policy?</p>	<p>Based on received feedback, the MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. ProTerra Foundation understands this issue is now clear in the final version.</p>
<p>It would be helpful for Proterra to include the requirements in article 3 of the EUDR here and try to provide some guidance on what evidences are acceptable for compliance under the EUDR. Proforest understands this is still not very clear from the EUDR yet itself but hopes more clarity will be redy by the time this Standard is released later this year.</p>	<p>Based on received feedback, the MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. ProTerra Foundation understands this issue is now clear in the final version. Focus is beyond the EU.</p>

<p>Please provide more detail on what a 'sufficient level of tabular data on a supplier' looks like? A set of minimum requirements would be helpful here.</p>	<p>Based on received feedback, the MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. ProTerra Foundation understands this issue is now clear in the final version.</p>
<p>Define what CAR information needs to be supplied. Would the criteria be collecting the CAR number, or CAR information and status (validated, cancelled, pending etc.)?</p>	<p>Reference to CAR was removed. It is valid only for Brazil.</p>
<p>"Would be good for ProTerra to define objectives at minimum companies should include. This includes any criteria on what DCF a policy should contain? e.g. covers all types of sources, geographies and business units, includes concept of Deforestation and Conversion aligned with AFi, target date etc."</p>	<p>Clear requirements for MRV certification have been included under item 3.0 and 4 of the revised standard.</p>
<p>"It would be helpful to understand how this will be verified. Perhaps including something similar or adding to the following which is in the audit document: <i>Access the geospatial database used to monitor all commitment compliance indicators either operated within the organisation or contracted outside, to verify indicators used to approve suppliers, such as deforestation of areas, the overlap of farmland with protected areas, such as indigenous territories, national parks, quilombo lands, settlements of the Agrarian Reform, existence embargoes, human rights violations, etc.</i> Including any data tools you see a suitable such as PRODES which you mention in references. "</p>	<p>Based on received feedback, the MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. ProTerra Foundation understands this issue is now clear in the final version. Focus is beyond the EU.</p>
<p>"How will this be monitored and verified remotely? Guidance isn't included in the audit document, only that it is a valid issue to block a supplier with immediate effect under certain circumstances. It only covers national environmental law and no other national laws?"</p>	<p>Based on received feedback, the MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. ProTerra Foundation understands that this issue is clear in the final version. Applicable laws are regulations that related to the topics that are covered by the MRV notably environmental, labour, human rights. For verification please consider new ANNEX A – Sampling of suppliers of the revised version.</p>

<p>Would a Chain of Custody verification explanation work well here? What this section is aiming to achieve is unclear. Is this instruction on the monitoring of indirect suppliers entirely separate to the assessment requirements?</p>	<p>Based on received feedback, the MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. ProTerra Foundation understands this issue is clear in the final version. Please refer to the new 3.10.</p>
<p>Does this section build on top of the requirements given for direct suppliers?</p>	<p>Based on received feedback, the MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. ProTerra Foundation understands this issue is clear in the final version. Requirements for direct and indirect suppliers are the same. For all indirect suppliers for which the economic operator does not have traceability information, the economic operator shall define an action plan to work with these suppliers to bring them to a traceable level in the medium term (3 to 5 years from the initial verification).</p>
<p>"ProTerra could support to define this a bit clearer. This statement indicates there is room for choice as to the level of monitoring, that a company can decide to only evaluate based on commitments or location."</p>	<p>Based on received feedback, the MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. ProTerra Foundation understands this issue is clear in the final version. Requirements for direct and indirect suppliers are the same. For all indirect suppliers for which the economic operator does not have traceability information, the economic operator shall define an action plan to work with these suppliers to bring them to a traceable level in the medium term (3 to 5 years from the initial verification).</p>
<p>We found this paragraph a bit unclear. Will this be applicable if the area is considered low-risk? If it is, and it does not allow compliance claims, then it would not be considered a risk-based approach, but instead a 'conditions under the level of traceability to source' based approach.</p>	<p>Based on received feedback, the MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. ProTerra Foundation understands this issue is clear in the final version.</p>

<p>"This section (paragraph) is not clear to us. It could be worth simplifying this section as well as Annex 4. It sounds like the Supplier Assessment has its own set of sustainability requirements whilst sustainability requirements for producing farms are directly referenced to the checklist. When the Sustainability Checklist acts as requirements and guidance for suppliers and farmers as well as marking criteria for auditing.</p> <p>It could be a good time here to clarify who gains the certification here / how it works. Can producers come forward on an individual basis to be MRV DCF certified? Or is this classification only completed through organisations and their suppliers?"</p>	<p>Based on received feedback, the MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. ProTerra Foundation understands this issue is clear in the final version.</p>
<p>The risk assessment method is only for Brazil, it is not clear if that is just an example and if it will be developed to other countries and areas? Again, what happens in municipalities outside cerrado and amazon?</p>	<p>Based on received feedback, the MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. ProTerra Foundation understands this issue is clear in the final version, MRV was originally developed and tested in Brazil but now has been up graded to be applicable to any location.</p>
<p>"It is not clear if the sampling is for solely auditing purposes or for the MRV implemented by the company. Please define if the sampling for indirect suppliers with no traceability information is for the company's purchase control or for auditing.</p> <p>So companies can do remote assessment in low risk areas?</p> <p>The Proforest team is happy to provide further feedback on these points once we have all the information on the scope of the sampling."</p>	<p>Based on received feedback, the MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. ProTerra Foundation understands this issue is clear in the final version. Requirements for direct and indirect suppliers are the same. For all indirect suppliers for which the economic operator does not have traceability information, the economic operator shall define an action plan to work with these suppliers to bring them to a traceable level in the medium term (3 to 5 years from the initial verification).</p>

<p>If the organisation/supplier has traceability to farm and production level, does that automatically mean they are considered low-risk? It would be good to have some clarification somewhere which explicitly states this is the case for direct suppliers.</p>	<p>No it does not. Based on received feedback, the MRV will be significantly revised to avoid misinterpretation. Wording will also be adjusted to avoid misunderstanding. MRV is a management system Standard. The term risk will be defined by the economic operator and confirmed if reasonable by the Certification Body. Guidance has been added on what to consider when defining risk.</p>
<p>Can there be clearer distinctions between smallholders / larger scale producers?</p>	<p>Definition will be added.</p>
<p>Specific qualifications and competencies for verification team, that include environmental and social expertise (we did not identify the social expertise)</p>	<p>Definition will be added.</p>
<p>No requirement for auditors to solicit external stakeholder input.</p>	<p>Not at this point in time.</p>
<p>How is certification decision made?</p>	<p>Made clear. Evidence of the closure of any non-compliance identified shall be presented by the economic operators to the VB up to 60 working days after the closing meeting. The verification decision will be based on the acceptance or not by the VB of the evidence provided and shall be communicated to the economic operator within 20 working days from the receipt of the evidence.</p>
<p>Is there a certificate of compliance?</p>	<p>Yes. Topic made clear in the revised version. Certification of Compliance with MRV.</p>
<p>How is the suspension process?</p>	<p>Yes. Topic made clear in the revised version.</p>
<p>How do you control the MRV claims?</p>	<p>Claims relate exclusively to being in compliance with the MRV requirements. They are controlled by the CB and based on a certificate with validity.</p>
<p>Are you going to make the verification reports publicly available?</p>	<p>No, not at this point in time.</p>

<p>Are you going to publicly disclose the list of MRV verified companies?</p>	<p>Yes.</p>
<p>Please clarify who counts as the operator here? Is this the supplier, the auditor or the farmer/producer. There is no mention of an operator in the audit document or the Standard document.</p>	<p>It refers to the organization seeking certification under MRV. Reference will be corrected.</p>
<p>The monitoring of greenhouse gas emissions could be added to 'Use of fossil fuels is monitored and measures are taken to reduce its consumption.' in the environment section of the checklist.</p>	<p>MRV Sustainability Checklist is based on the minimum requirements of FEFAC.</p>
<p>We would welcome the inclusion of zero tolerance to threats & violence against forest, land, and human rights defenders.</p>	<p>MRV Sustainability Checklist is based on the minimum requirements of FEFAC.</p>
<p>The inclusion of all ecosystems and conversion within the checklist is welcomed by Proforest.</p>	<p>MRV Sustainability Checklist is based on the minimum requirements of FEFAC.</p>
<p>"Want to note that for this section, we don't think we had all the information. It would be great to see the guidance on this. Some thoughts and questions which emerged include: Clear clarification on the different types of MB accepted for DCF verified volumes. How will mixing be controlled? This is notable further downstream."</p>	<p>"The ProTerra MRV is applicable to all economic operators who are engaged in the purchase, commercialization, or storage of agricultural commodities or their products. Any agricultural commodity and related products can be included in the scope of a specific MRV Verification. The MRV is a verification of the economic operator's management system associated with the supply chain of agricultural commodities and related products. The objective is to verify whether the economic operator adequately manages its supply chain to ensure that it is sustainable and free from deforestation".</p>

<p>When mixing with non-MVR-certified but DCF verified material, what level of evidence is required from that third-party? How will you ensure this is carried out?</p>	<p>The entire MRV documentation has been revised based on feedback. The final version indicates that the economic operator shall have, and shall consistently employ, standard operating procedures for maintaining full segregation for each lot of MRV product from other materials from the point of receipt to the point of transfer to the next level in the supply chain. Precautions, including maintenance and physical labelling of facilities and conveyances, must be in place to prevent the co-mingling of MRV material with other materials during transport loading and unloading activities.</p>
<p>"Proforest welcomes the effort and progress which ProTerra is addressing the blind spot in relation non-certified volumes coming in and the mixing that takes place. However, we do have a few additional points we would like to clarify/address. Who owns the certificate? The producer/farmer or another supply chain actor?"</p>	<p>The ProTerra MRV is applicable to all economic operators who are engaged in the purchase, commercialisation, or storage of agricultural commodities or their products. Any agricultural commodity and related products can be included in the scope of a specific MRV Verification. The MRV is a verification of the economic operator's management system associated with the supply chain of agricultural commodities and related products. Who applied for certification and is successfully approved owns the certificate (not its suppliers).</p>
<p>Can guidance be shared on the MB calculations used / what the standard is based upon?</p>	<p>No mass balance is considered. It is management system Standard.</p>
<p>This sentence appears to read as if you wish to reduce 'corporate responsibility' when you wish to increase 'corporate responsibility : that aims to decrease/reduce and mitigate the risk of importing raw materials that may be connected to deforestation or social corporate responsibility.</p>	<p>We apologise but could not find this sentence in the MRV documents. Nevertheless, MRV is intended to be a tool to help organisations with their "corporate responsibilities" and the sentence is trying to indicate that using MRV can be motivated exclusively by corporate responsibility issues/considerations. However, MRV has been totally revised and this sentence is no longer considered.</p>
<p>Cut-off date for deforestation is August 2020, while EUDR is December 31 2020. Why the difference?</p>	<p>Under MRV the cut date has been reset to 31 December 2020 or earlier if required by local regulations.</p>

<p>What is the role of this standard in the due diligence process of different actors in the supply chain (see new code under consultation of ISEAL)?</p>	<p>The Monitoring and Verification Program (MRV) is an interactive, ongoing process that companies use to assess and demonstrate compliance, performance, and progress with respect to their supply chain. So with this in mind MRV is considered a tool to help generate data that is needed to meet the due diligence requirements of the EU. It focus strongly on understanding and therefore helping to prevent deforestations while its checklist (now presented in a different form - item 4.0) has many elements associated to legal compliance (it is not designed for a an specific country).</p>
<p>Clarify the scope of companies to implement this standard.</p>	<p>The ProTerra MRV is applicable to all economic operators who are engaged in the purchase, commercialisation, or storage of agricultural commodities or their products. Any agricultural commodity and related products can be included in the scope of a specific MRV Verification. The MRV is a verification of the economic operator´s management system associated with the supply chain of agricultural commodities and related products.</p>
<p>The use of "Should" and "Shall" indicates it is an option and must not be used for mandatory requirements.</p>	<p>"Standard language, use: • "shall" indicates a requirement • "should" indicates a recommendation • "may" indicates a permission • "can" indicates a possibility or a capability • "may not" indicates a prohibited action Adjusted and added to the term and definition section."</p>
<p>Indirect vs Intermediate: either use one term and clearly define this term, now they are used both and it is very confusing.</p>	<p>Added to the definitions section.</p>
<p>Indirect suppliers can also mean suppliers or products and service that are not part of the companies core business (e.g. cleaning services, IT-service, etc.) are they also part of the scope of suppliers to be assessed, or only suppliers contributing to the companies core business?</p>	<p>Added to the definitions section.</p>

<p>4.1.7.2: it is not illegal OR legal deforestation, it is free from illegal AND legal deforestation.</p>	<p>The entire MRV documentation has been revised based on feedback. The final version indicates that farms shall comply with the legislation relevant to the expansion of agricultural production. No crop shall be produced in converted natural ecosystems (natural forests, native grasslands, wetlands, swamps, peatlands, savannahs, steep slopes and riparian areas) nor in areas subjected to deforestation after 31 December 2020 or earlier if required by local regulations.</p>
<p>Why is respect to International Human Rights not part of the requirements listed in 4.1?</p>	<p>The entire MRV documentation has been revised based on feedback. Suppliers shall respect international laws and legally enforced standards on the rights of indigenous people and tenure rights of local communities. Other human right topics are considered under topic 4.1 Working Conditions (these topics were nevertheless considered in the version that was submitted to public consultation).</p>
<p>4. Sustainability monitoring on Farm level: Is the on-site assessment required for the organization that wishes to meet the MRV standard, or will the independent auditor verify on farm level the MRV system of the organization?</p>	<p>Both. Auditor will verify the organisation management system and a sample of suppliers.</p>
<p>There is no time span defined for the sampling size, I assume this is per year?</p>	<p>Certificates are valid for 1 year.</p>
<p>4.2 Indirect Sourcing - Monitoring of intermediaries/indirect suppliers 1. How is this approach compliant with EUDR where traceability of the product may not be fully known / geo coordinates are not required to be supplied?</p>	<p>MRV is not intended for compliance with EUDR in the absolute sense. Requirements for direct and indirect suppliers are the same. For all indirect suppliers for which the economic operator does not have traceability information, the economic operator shall define an action plan to work with these suppliers to bring them to a traceable level in the medium term (3 to 5 years from the initial verification). It has to be a process of working with supply chain to be in compliance.</p>

<p>Sample size can be adjusted based on risk of deforestation, this does not consider other risks, such as tenure rights, human rights, labour rights, good farming practices etc. This may increase the risk that non-compliances related to these issues are missed.</p>	<p>MRV has been totally revised based on the comments received. Final version does consider other risks please refer to 3.3.</p>
<p>Sampling methodology for farms of variable size – when selecting the large farms is the threshold >80% of average crop volume supplied by farms in that production area? And likewise for the small farms is it.</p>	<p>MRV has been totally revised based on the comments received. At the final version please refer to ANNEX A – Sampling of suppliers. Sampling will be based on a % of the total number of suppliers plus the associated risk classification.</p>
<p>How are farms identified if they are supply product through indirect suppliers where traceability / source geo-coordinates may not be known?</p>	<p>The organisation needs to start working with its direct suppliers to obtain this information in the long run. This is the key objective of the MRV. It will help identify where data gaps exists, where they are coming from and based on that start working with suppliers. The information will not be available for 2 or 3 cycles. MRV is a process not a immediate solution.</p>
<p>Feedback on MRV Checklist: We would like to see the checklist prohibit the practice of charging fees and costs related to recruitment, employment or termination processes to workers. The practice of workers providing deposits as part of the recruitment process should also be prohibited.</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>
<p>Checklist: Written and communicated policies and procedures on the use of alcohol and drugs should be required.</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>
<p>ChecklistDisciplinary measures should not include wage deductions even if legally permitted. The checklist should also prohibited the removal of contractual benefits as a result of disciplinary measures.</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>
<p>Checklist: We are glad to see that rest areas must be provided to workers but we would the checklist to require regular rest periods agreed through contracts or through worker representations. The checklist should also address the special rest needs of women workers relation to pregnancy, breastfeeding and reproductive health.</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>

<p>Checklist: Requirements on the working week and overtime should specify that workers have at least 24 consecutive hours rest every seven days in line with ILO conventions. Exceptional circumstances may be permitted if approved under national legislation for example during peak harvest demands.</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>
<p>The checklist should require that workers are compensated for additional living costs resulting from working away from their base location.</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>
<p>Checklist: The checklist should require that workers receive a payslip with complete pay, benefits and deduction information that reflects the pay received.</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>
<p>Checklist: Suppliers should be required to provide accident insurance to all workers. Insurance should covers medical treatment for work related injuries and illnesses and provides compensation for work related injuries and illnesses resulting in permanent disability or death.</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>
<p>Checklist: The checklist should also require that accidents and near misses related to occupational health and safety are reported, analysed, followed-up and acted upon. It should also require that records of accidents and near misses are kept.</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>
<p>Checklist: Building safety, including electrical wiring, gas fixtures and structural safety should be specifically addressed in the checklist.</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>
<p>Checklist: Drinking water should be available to workers within a reasonable distance of the work area.</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>
<p>"Environmental Responsibility 1. We ProTerra Foundation understands this section should be stronger on the protection and enhancement of biodiversity within the farm. Specifically the checklist should prohibit the hunting, killing, fishing, collecting, trafficking of threatened species. Invasive species should also not be introduced or released by suppliers unless measures are taken to monitor and prevent the spread of these species beyond farms."</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>

<p>Environmental Responsibility: Farms should also be required to have biodiversity plans to enhance biodiversity and landscape connectivity. These plan should consider the protection and enhancement of biodiversity beyond legal reserves and rather identify actions to restore, improve, enlarge, or create high-biodiversity landscape features within the farm boundaries. This is important for restoring biodiversity beyond protected areas, enabling species to move between protected areas – helping them to adapt to climate change and maintain gene flow between isolated subpopulations of species.</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>
<p>Environmental responsibility: We would like to see the practice of landfilling waste on farm prohibited as well the incineration of waste on farm unless for the purpose of energy recovery.</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>
<p>"Good agricultural practices 1. We agree that chemicals on the Stockholm and Rotterdam Conventions should be prohibited, but we would also like to see chemicals listed as Class 1a (Extremely hazardous) and Class 1b (Highly hazardous) of WHO recommended Classification of Pesticides by Hazard prohibited as well (see guidelines here: https://www.who.int/publications/i/item/9789240005662)".</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>
<p>Good agricultural practices: Chemical risks should also be assessed as per the UN Global Harmonising System and chemicals labelled accordingly.</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>
<p>"Good agricultural practices: Good agricultural practices concerning maintaining soil fertility and health and minimising run-off should include the use of regular soil and/or leaf tests to ensure fertilisers are applied in such a way that nutrients become available when and where the crops need them."</p>	<p>MRV Sustainability Checklist (now item 4.0) is based on the minimum requirements of FEFAC.</p>

<p>Auditing Monitoring System for Deforestation, Land Use Change and Human Rights: Clarify the scope of the audit and to be audited company.</p>	<p>"The ProTerra MRV is applicable to all economic operators who are engaged in the purchase, commercialisation, or storage of agricultural commodities or their products. Any agricultural commodity and related products can be included in the scope of a specific MRV Verification. The MRV is a verification of the economic operator's management system associated with the supply chain of agricultural commodities and related products. The objective is to verify whether the economic operator adequately manages its supply chain to ensure that it is sustainable and free from deforestation. MRV, therefore, assesses the economic operator's purchasing practices, contracts and direct and indirect suppliers' performance in terms of sustainability, among other issues."</p>
<p>Auditing Monitoring System for Deforestation, Land Use Change and Human Rights: Define duration of the audit.</p>	<p>This is not possible, it depends on the complexity of the organisations and the number of suppliers that will be visited as part of the sample. Each case will be defined by the CB considering the specificities.</p>
<p>Auditing Monitoring System for Deforestation, Land Use Change and Human Rights: Define the time a assessment report will be send to the audited company (only the time to respond on the assessment report is mentioned).</p>	<p>"Topic was clarified in the revised version. The Verification Report is due 20 working days after the conclusion of the verification assessment of an economic operator (which includes the assessment of the sampled suppliers). An individualised report should be prepared considering the MRV Sustainability requirement for each supplier assessed. Suppliers will receive a copy of their specific report 15 working days after the delivery of the Verification Report to the economic operator. "</p>
<p>Auditing Monitoring System for Deforestation, Land Use Change and Human Rights: Activities are very specific for the auditor, it would help to add the purpose and wished outcome of these activities: too understand the need and also to potentially include other questions activities to see the outcome.</p>	<p>Topic was totally rearranged based on the feedback received. Clear indicators (what has to be done/ what is expected) are stated under section 3 and 4.</p>
<p>Auditing Monitoring System for Deforestation, Land Use Change and Human Rights: I miss the assessment of risk mitigation strategies by the auditor.</p>	<p>Topic was totally rearranged based on the feedback received. Please check ANNEX B – Verification Protocol item 1.2 Verification Process keeping in mind MRV is a managements system Standard.</p>

<p>Auditing Monitoring System for Deforestation, Land Use Change and Human Rights: There seems to be a lot of focus on the effectiveness of the system, not on the robustness of the system, e.g. no assessment of the processes.</p>	<p>Topic was totally rearranged based on the feedback received. Please check ANNEX B – Verification Protocol item 1.2 Verification Process keeping in mind MRV is a managements system Standard.</p>
<p>Auditing Monitoring System for Deforestation, Land Use Change and Human Rights: 1.3 Complaint and Appeal and 1.3 Sampling have the same number.</p>	<p>To be corrected.</p>
<p>Auditing Monitoring System for Deforestation, Land Use Change and Human Rights: The Sampling is for the auditor? Or the auditor will verify the sampling done by the company as this same sampling is mentioned in the MRV Standard.</p>	<p>Topic was totally rearranged based on the feedback received and made more clear. The sampling under ANNEX A is for the auditor.</p>
<p>Auditing Monitoring System for Deforestation, Land Use Change and Human Rights: 1.3.3 How does this rating from low-medium-high-very-high relate to the EUDR rating of Low, High and Standard Risk.</p>	<p>It does not relate. EU has not specified the risk criteria + the risk with be defined per country what will be done by EU authorities (this risk herein in is at the supplier level). Additionally the term risk and its classification at the operational level, will be defined by the economic operator and confirmed if reasonable by the Certification Body. Guidance has been added on what to consider when defining risk. Once the EUDR presents detail definition of risk this may (or not) be adopted in a future revision. The focus of MRV is not exclusively the EU market.</p>
<p>Auditing Monitoring System for Deforestation, Land Use Change and Human Rights: 1.3.4 Farm Level: Will the auditor audit all these farms on-site? What is the expected duration of such audit? Or is the organization expected to do these audits every year and will the auditor verify?</p>	<p>Audits are to be done by the auditor based on a sample and typically on site. The duration of the audit will depend on the complexity of the area, size of farm/supplier, sample size, etc. This will be defined by the CB before starting.</p>
<p>Auditing Monitoring System for Deforestation, Land Use Change and Human Rights: 6.1 Clarify definitions of Indirect, Intermediate (see comment on the standard).</p>	<p>Definitions have been added.</p>
<p>Auditing Monitoring System for Deforestation, Land Use Change and Human Rights: 6.1 cut-off date is August 31 2020, while EUDR is December 31 2020. Explain the Difference.</p>	<p>Under MRV the cut date has been reset to 31 December 2020 or earlier if required by local regulations.</p>