

# OUTCOME OF THE PUBLIC CONSULTATION OF PROTERRA STANDARD V5

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19-09-2023



Suggestion / consideration	ProTerra Response
In addition to the biomes there was the inclusion of HCVs and high carbon stock (should it not be ProTerra accepting users to use one or the other approach? Can it be both?) Analyse there could be some incompatibility.	Will be removed de reference to high carbon stock.
With cut-off date for 2008 without flexibility: indicator 4.3.1 (CORE - Certified Organizations shall perform a comprehensive Environmental and Social Impact Assessment (ESIA) for any large or high-risk greenfield expansion or new infrastructure projects.... ) actually doesn't make much sense now because greenfield expansion is impossible.	The requirement will be rephrased to be made clear.
"Create a new indicator: Managements system for the supply chain (certified organization is responsible to implement and maintain) + The sampling amount by the CB could even go down if the certified operator's internal control system was good."	Indicator on Management System will be created. As it is a new requirement impact to supply chain operation will occur in the long run and reduction of sampling will be considered in a future PT revision (v6).
Create different levels of compliance as in Proterra India.	With the entering in force of the deforestation free regulation in EU PT Foundation understandings that this is not necessary and could create contractions and non compliance with legal requirements. Two new indicators ( 9.4.5 and 4.1.1) have been created associate to EU regulations.
See paper "Final report "Setting the bar for deforestation-free soy in Europe". Consider as appropriate.	With the entering in force of the deforestation free regulation in EU PT Foundation understands that compliance with this regulation should be focus. EU definitions will be incorporated as will the accountability Framework be used a key reference as applicable. Two new indicators ( 9.4.5 and 4.1.1) have been created associate to EU regulations.
Include requirements regarding animal welfare.	A new Appendix on Animal husbandry will be incorporated to ProTerra and animal welfare will be included therein.

<p>Integrate a risk based approach for all regions, similar to PT Europa, decrease interpretations, add PT Europa as an annex.</p>	<p>With the entering in force of the deforestation free regulation in EU PT Foundation understandings that this is not necessary and could create contractions and non compliance with legal requirements. Two new indicators ( 9.4.5 and 4.1.1) have been created associate to EU regulations.</p>
<p>Add rules for Employment Agency contract conditions (these must meet Proterra Requirement) and Include explicit reference to no recruitment fees.</p>	<p>Will be included.</p>
<p>Include explicit reference to no fees for uniforms or PPE.</p>	<p>Will be included.</p>
<p>Food safety requirements / Understand and eventually consider aspects of WHO Codex Alimentarius / Consider FSS <a href="https://www.zef.de/fileadmin/webfiles/downloads/projects/FSS/20170516_Food_Security_Standard_Brief.pdf">https://www.zef.de/fileadmin/webfiles/downloads/projects/FSS/20170516_Food_Security_Standard_Brief.pdf</a> when adding/looking at food security, adding certain elements would be advantageous.</p>	<p>Will be include a general requirement to comply with food safety regulations . Beyond that ( adding specific requirements is beyond the scope of ProTerra Standard.</p>
<p>1) Maintain equipment and machinery to ensure their proper, efficient functioning.  2) Add criteria on nutrient management or at least integrate in other environmental indicators.  3) Be aligned with international management practices (include criteria on all): Crop management, soil management, nutrient management.  4) Define criteria for soil fertility - Provide best practice guidance.  5) Based on FEFAC benchmarking exercise ProTerra was requested to include: Compliance with regulations on usage of biocontrol agents.</p>	<p>All suggestions have been considered, except for a detailed criteria for soil fertility ( ProTerra is multiple crop and therefore can not provide specific performance levels). Note that several of the points in the suggestion already existed (e.g. crop management is under 9.3.1).</p>
<p>1) maintain and calibrate crop protection product and fertilizer application equipment on a regular basis.  2) Obligation of Level I to declare volumes and volume feed shall apply to contracted ProTerra volumes on Level I not only TCCs.  3) Principle 10 - All the requirements of this section should be CORE.</p>	<p>Will be included.</p>

<p>1) ensure that all children under 15 years living on the farm can go to school or receive schooling at home.</p> <p>2) From FCID Principle 2 - We do not understand why Level II operations should be exempt from the requirements in this section. If ProTerra wishes to be a leading voice and mark of sustainable supply chains, then we would advocate for including such basic requirements throughout.</p> <p>3) Based on FEAC benchmarking exercise ProTerra was requested to include: Presence on site of emergency first aid kits.</p>	<p>Will be included. Point 1 under 2.1.4 and point 3 under 2.9.2. Several of the requirements of Principle 2 have been extended to level II based on risk. Others may be added in future revisions.</p>
<p>Farmer and workers who have been injured or are ill, do not perform activities that are detrimental to their health and safety or that of the other workers.</p>	<p>Will be included.</p>
<p>1) Understand and eventually consider aspects of LO 129 and 155 (make explicit reference in Appendix B).</p> <p>2) In 2007, the UN General Assembly adopted the United Nations Declaration on the Rights of Indigenous Peoples, recognizing their rights and making specific mention of Free, Prior and Informed Consent (FPIC) as a pre-requisite for any activity that affects their ancestral lands, territories and natural resources. (make explicit reference in Appendix B).</p> <p>3) Add all the international conventions listed in the EU DD regulation.</p>	<p>Will be included.</p>
<p>Access to drinking water (harvest in special).</p>	<p>Will be included.</p>
<p>Obligation of traders to certify. How to deal with this issue.</p>	<p>Will not be included ( note new requirements have been included for Level II increasing traceability and sustainability at trader level).</p>
<p>How to deal with livelihood issues: minimum wage versus living wage? Integrate in the standard the concept of Living income (either what we have now or the min. living income).</p>	<p>Will not be included (we understand this is not feasible at this point in time).</p>
<p>Include something explicit on anti corruption (?)</p>	<p>Will be included.</p>

<p>"1) growers that had deforestation after 2008 could be accepted if at the time of audit/ certification they have already compensated or have a concrete plan to do so within the period of the corrective plan.  2) Make clear that deforestation is for farm and not crop only.  3) In addition to the biomes there was the inclusion of HCVs and high carbon stock (should it not be ProTerra accepting one or the other approach? Can technically it be both?"</p>	<p>Will be included ( new guidance on 4.1.1). High carbon stock will be removed.</p>
<p>1) AFI (acc.framework) as definition basis / Include a definition for conversion (Afi) and 'native vegetation'.  2) We could precise our smallholder definition.  3)Add definition of irrigation.  4)Define what exactly transformation means to have clarity on differences between Level II and III.</p>	<p>Definitions will be added except for the definition of transformation ( under level II no transformations is possible - it included only storage, commercialization and transport).</p>
<p>See English language improvements and more based on the German translator notes ( part 1 and 2).</p>	<p>Will be done.</p>
<p>"1) In countries where the is absence of local laws and regulations concerning environmental topic. There is no guidance in the ProTerra Standard about this specific situation. The suggestion is that there is a guidance in the Standard to consider the application of World Bank and IFC guidelines regarding emissions levels.  2) Principle 6 - We do not understand why Level II operations should be exempt from the requirements in this section. If ProTerra wishes to be a leading voice and mark of sustainable supply chains, then we would advocate for including such basic requirements throughout."</p>	<p>Reference to IFC was added and level II was included as applicable.</p>

<p>1) Desiccation free cereals, prohibited use of desiccation  2) Focus more on pesticide residues than ever before ( ref Swiss study - On eight of the 23 ProTerra farms, three substances from WHO List Ib, which the standard bans, were used. Overall, the contamination of arable soils is comparable to that in other regions of the world.  3) Update the list of banned active substances with the participation of scientists to include further WHO I, II pesticides.</p>	<p>Points 2 and 3 will be included (2 discussed under 9.6.3 and 3 will be based on WHO updates). Point 1 is not feasible as several countries need desiccation.</p>
<p>Indicate the topics that are covered by the term " compliance regulations ( indicate that this covers h&amp;s, env, labour, etc).</p>	<p>Will be done.</p>
<p>Analyse the biotope networking on the certified farms by means of remote sensing and GIS + identification of deficit areas/ Introduce biotope networking as a principle.</p>	<p>The requirement will be up dated to include the use of satellite images. Additional suggestion will be considered for a future revision.</p>
<p>"1.1.5 CORE - Certified organizations shall ensure that suppliers of core inputs and services are compliant with the ProTerra Standard. This should not be applicable to smallholders (?)"</p>	<p>Will not be included (we understand this is not feasible for smallholder and they are at the starting point of the supply chain).</p>
<p>"1.1.6 Certified organizations 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. This should not be applicable to smallholders (?)"</p>	<p>Will not be included (we understand this is not feasible for smallholder and they are at the starting point of the supply chain).</p>
<p>Level 3 certification: redefine the cores and principles in order to concentrate more on management system processes in case of food producers to create a more pragmatic approach. Maybe implement a risk based approach (similar to the European interpretation) for all level III companies that wish to be certified if raw material delivery is not direct (not processing fresh products).</p>	<p>ProTerra Standard is not a Management system Standard. Nevertheless and indicator has been created considering the need of a supplier management system being implemented.</p>
<p>Include a criteria on soil health, soil biology.</p>	<p>Will be included as a general requirement (refer to 9.3.1).</p>

<p>"Standard language, use:</p> <ul style="list-style-type: none"> <li>• "shall" indicates a requirement</li> <li>• "should" indicates a recommendation</li> <li>• "may" indicates a permission</li> <li>• "can" indicates a possibility or a capability</li> <li>• "may not" indicates a prohibited action</li> </ul> <p>Review wording in standard ( must/shall/may) to use a very direct wording and avoid confusion on what is mandatory or not ( example are wording on 10.1.4)"</p>	<p>Will be included.</p>
<ol style="list-style-type: none"> <li>1) Producers are required to engage with affected stakeholders and document measures taken to resolve disputes related to water is missing.</li> <li>2) Consider Water management plan from BioSuisse-definitions etc.</li> <li>3) Future issues such as water catchment areas not yet considered.</li> <li>4) Provide best practice manual - risk assessment for water use in risk areas.</li> </ol>	<p>Most of the suggestions will be considered. Point 1 will be addressed under 7.1.2; Management Plans will be considered under 7.1.4 while point 4 under 7.1.5.</p>
<p>On page. 5 change the email address from standards@proterrafoundation.org to info@proterrafoundation.org.</p>	<p>Will be included.</p>
<p>TAGS: Check if singular or plural of Level applies + Check the colours of the tags, for example B should be green and not blue ( have these tags been useful and should they be kept?).</p>	<p>Tags will be removed.</p>
<p>Define the habitats -HCV- better (measures, scale, definition min. size etc).</p>	<p>HVC are very well defined ( refer to section III: TERMS AND DEFINITIONS). No further details is needed ( note also that HCV is not a concept created by ProTerra Foundation).</p>

<p>"1) Future issues such as climate change not yet considered.  2) Future issues such energy balancing not yet considered.  3) Be aligned with international management practices (make sure we include criteria on all of the below) :Energy efficiency.  4) Indicate external reference that can be considered as waiver for some parts of ProTerra such as:  The GHG emissions ("carbon footprint") associated with the product are calculated with a life cycle approach and according to the LCA (Life Cycle Assessment) methodology, having the following standards as references: UNI EN ISO 14040 and UNI EN ISO 14044, and/or ISO TS 14067 and/or ISO 14064-1."</p>	<p>Partially considered. Will be added elements related to point 1, 3, 4 and 5.</p>
<p>"1) Add biodiversity management plan / include risk assessment in case of relevant changes in activities add before the one that refers to expansion. Not to be core).  2) Be aligned with international management practices (make sure we include criteria on all of the below) :High-diversity landscape features.  3) Remedy of post harms: Add clear requirements related to restoration/compensation in the case of conversion. (Post-cut-off date conversion (even minimal conversion) is not allowed) , add clear requirements regarding legacy harms and remediation of associated human rights, address legacy harms and company obligations related to them.  Remediation activities monitored and reported.  4) Define audit requirements for deforestation-free verification (satellite imagery etc) and non GMO testing (events, sampling procedure)  5) Consider a mechanisms for restauration of ecosystem."</p>	<p>Partially considered. Will be pending for a future revision risk assessment.</p>
<p>Prescribe "whole farm" certification for "no go's" such as deforestation free and child labour, independently from the certified crop.</p>	<p>Will be considered. The entire farm is the certification unit ( has always been, but wording will be improved). Note that all Core requirements are a "no go" for certification.</p>
<p>Evaluate adding a "Quality assurance system" email and results from Coop Sweden 27.11.2020.</p>	<p>A quality management system is outside the scope of ProTerra.</p>
<p>Formulate the implementation for the control bodies in more detail.</p>	<p>Not Standard related. Note this is an ongoing action as part of the ProTerra ISEAL improvement Plan.</p>



<p>implement E&amp;M plan according to ISEAL criteria.</p>	<p>Not Standard related. Note this is an ongoing action as part of the ProTerra ISEAL improvement Plan and updates and details of the M&amp;E can be found on the ProTerra website.</p>
<p>Provide the soy buyers with up-to-date online satellite maps showing the areas of all certified farms (anonymized).</p>	<p>Not Standard related.</p>
<p>In pilot projects, test the implementation of a landscape approach (Mallet et al., 2016), which e.g. brings together private and public actors at the level of the Brazilian municipalities and takes agricultural businesses and landscape into account as a whole (e.g. project in Sorriso).</p>	<p>Not Standard related.</p>
<p>Provide the producers with a continuously updated online list of the crop protection products prohibited in the standard (not just the active ingredients). This should be taken into account in the next standard revision.</p>	<p>Not Standard related.</p>
<p>1) Improve non-GMO requirements to make them more clear including threshold values/GMO that are acceptable, etc. Include definitions.  2) From FCID: 5.1 - We fully appreciate and support the intention to exclude GMOs. Up until this point in ProTerra's history, since FoodChain ID has been the sole certification body and since we have a track record of expertise and certification rigor in this topic, and since many ProTerra operators are also certified to our own non-GMO Standard, the verification of non-GMO activities has been relatively straightforward; thus the ProTerra Standard has been able to function well with its relatively brief language under Principle 5. We are concerned however that as other CBs enter the program that there could be inconsistency in how non-GMO status is evaluated and assured. The Standard needs more in-depth sampling and testing guidelines than currently appear in it. ProTerra could also potentially benchmark existing non-GMO standards and accept certification to them as proof of compliance with this section of the ProTerra Standard, and/or incorporate similar requirements under Principle 5. We understand that this is a complex issue and invite ProTerra Foundation to have a more in-depth discussion with us so that we may collaborate to develop these ideas further.  3)Should Proterra allow for certification of GMO crops/products, would you see any additional actions, requirement that could be considered under ProTerra to reduce or mitigate risks/impacts associated to this new ProTerra certification?</p>	<p>ProTerra will create a separate document to address GMO sampling to be launched as part of V5.</p>

<p>1) Align with FCID on sampling size (how and how much per LOT) and on events that have to be analysed (VLOG benchmark).  2) Include sampling methodology and clear description for all levels (not only raw materials, e.g. core suppliers for food processors)/ Consider a risk criteria for sampling?</p>	<p>ProTerra will create a separate document to address GMO sampling to be launched as part of V5.</p>
<p>1) Define clear definitions and requirements for mass balance approaches (incl. the requirements for the non-certified inputs) / see Danube soy / add basic requirements/ to be in the certificate in the future if mass balance or full segregation /for mass balance add requirements for pesticides / forced and child labour/ land use change.  2) Add more detailed requirements on mass balance and segregated and incentives models.  3) Better explain the use of mass balance as chain of custody model. In the Standard indicated that limited claims must be made associated to this model.</p>	<p>Improvements will be considered including making reference in the certified of the type of system used by an organisation. Pesticide minimum criteria have been also added.</p>
<p>"Indicate external reference that can be considered as waiver for some parts of ProTerra such as: Having certification on EN ISO 22005:2008 Traceability in the feed and food chain - General principles and basic requirements for system design and implementation."</p>	<p>ProTerra has improved clarity on traceability requirements, that we currently understand should solve the issue.</p>

<p>"Define the retention period (for all indicators listed below) of minimum 2 years if there is no legal requirement or the legally required period is shorter than two years.  ProTerra Indicators:  1.1.2 Certified organizations shall document and retain records of compliance for at least 5 years or longer if required by local law.  2.6.4 The certified organization shall maintain personnel records for each employee for at least 5 years or longer if required by local law.  2.7.3 Certified organizations shall maintain records for all training for a minimum of 5 years, or longer if specified by local regulations.  2.10.2 Certified organizations shall maintain records for all health and safety training for a minimum of 5 years, or longer if specified by local regulations.  3.1.2 Complaints, responsive actions, and outcomes shall be documented and records maintained for 5 years or more if required by local law.  9.4.1 All records referred to in the following indicators should be kept for 5 years or longer if required by local regulations (seed, agricultural production, 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).  10.1.1 All records related to the Chain of Custody System shall be kept for 5 years or longer if required by local regulations."</p>	<p>Will not be considered. Under ProTerra Document retention is of 5 years.</p>
<p>1) Include EHRD protection, remediation of impacts to indigenous peoples or local communities, social impacts / not core beyond biodiversity also check social impacts related to changes.  2) The certified company identifies indigenous peoples' and local communities' formal and customary rights to lands, territories, and resources in the context of any company activity. This includes rights to own, occupy, use, and administer these lands, territories, and resources.</p>	<p>Partially added ( 4.3.1).</p>
<p>Company commitments shall be embedded into decision-making processes, systems, and performance metrics of core business units and company affiliates and subsidiaries, showing leadership on a high-management level.</p>	<p>Requirement associated to a Supplier management system have been added, therefore partially addressing the suggestion.</p>
<p>Make it obligatory for the whole supply chain to become certified to increase traceability-board decision.</p>	<p>Will not be considered. ProTerra is voluntary.</p>

<p>1) Adjust FPIC: The certified company ensures that, prior to any activity that may affect indigenous peoples' and local communities' rights, land, resources, territories, livelihoods, and food security, their Free, Prior and Informed Consent (FPIC) is secured.</p> <p>2) Based on FEFAC benchmarking exercise ProTerra was requested to include: In the case of grievance, involve competent authorities.</p>	<p>Will be considered.</p>
<p>Re-evaluate documents and processes in order to get information from FCID: (customer information-customer portal), Part of the revision: TCCs and certificates should be obligatory to be sent to PTF (e.g.to <a href="mailto:quality@proterrafoundation.org">quality@proterrafoundation.org</a> ) .-should be created) . This process should be evident and added to the protocol too.</p>	<p>Not Standard related. TCC will not be a Standard requirements under V5.</p>
<p>Add requirements on pesticide and GMO testing (min. requirements and scope of analysis).</p>	<p>Will be considered.</p>
<p>Make a more clear statement/requirement about irrigation management and salinization minimization.</p>	<p>Will be considered.</p>
<p>"7.1.1 CORE(Levels I, II and III) - Certified organizations shall conserve quantity and quality of existing natural water resources, such as lakes, rivers, artificial lakes, dams, water tables and aquifers around their facilities./ This should not be applicable to Level II."</p>	<p>Will be considered.</p>
<p>Explore if elements and reference to regenerative agricultural can be added.</p>	<p>Will be considered.</p>
<p>Add the principle of shared responsibility to the standard.</p>	<p>Will not be considered ( note that big processor already have " responsibility" in guiding smaller suppliers.</p>
<p>Feed back from Insecta revision public consultation that can be useful for V5 ( double check cross reference to numeration).</p>	<p>Will be considered.</p>

<p>page 4 - Under the section that read: "Businesses enterprises that support the ProTerra Foundation mission and vision must sign a membership declaration to commit to:" - We suggest that it may be worth considering here if the language could be stronger, to require certified companies to fully commit to the Standard, as opposed to only certifying small parts of their overall holdings while the majority of their operations may causes negative environmental and social impact. This was a central critique of the Greenpeace exposé published in 2020.</p>	<p>This has been addressed in the application process (membership declaration has been reviewed).</p>
<p>1.1.1 - It should be incumbent upon the certified operation to show how they know about what laws are relevant, and how they keep up to date. This also shares the burden of proof/verification with the auditor/CB.</p>	<p>Will be considered (guidance 1.1.1).</p>
<p>1.2.1 - If an operation fully complies with all requirements, then what? ( refer to text in Insecta).</p>	<p>Will be considered (guidance 1.1.1).</p>
<p>2.6.1 - Please clarify: period of notice of what?</p>	<p>Will be considered (this refers to period of notice for work termination).</p>
<p>2.6.4 - Insert a comma after 5 years. This clarifies the meaning.</p>	<p>Will be considered.</p>
<p>2.8.1 - This seems like a potential hole. If there is no legal minimum wage and everybody in the areas is paid a typical but insufficient amount to have a decent life, shouldn't the minimum follow some other criterion? The guidance helps but is still likely too vague to be verifiable or enforceable if there is a questionable practice. ProTerra might also gather data from multiple certifications to inform a reasonable minimum wage.</p>	<p>Guidance removed to avoid confusion. ProTerra is applicable to all location in the globe. As such, CB has to have local knowledge to understand this point in the local context.</p>
<p>2.8.2 - See comment for 2.8.1 and then add "or the wage determined under 2.8.1."</p>	<p>Added text to make the requirement more complete and clear, but not in line with the suggestion ( see previous reply on the need of CB having local expertise).</p>

<p>2.9.3 - For the guidance, some basic record of who got hurt when should be doable for smallholders.</p>	<p>Documentation requirements has been rephrased. This indicator is not applicable to smallholder. It is applicable to smallholders that are part of the supply chain of industrial processors seeking certification, training should be provided the processors, as applicable.</p>
<p>3.1 - Why don't 3.1.1, 3.1.2, and 3.1.3 also pertain to Level II operations?</p>	<p>Several new requirements have been added to level II. These 3 are not considered a priority at this point in time.</p>
<p>3.1.2 - Insert a comma after 5 years. This clarifies the meaning.</p>	<p>Will be considered.</p>
<p>3.2.4 - If a smallholder is operating more or less dependent on selling to a primary processor or similar buyer, there needs to be some requirement from the buyer toward a fair price in order to consistently assure the smallholder can meet the requirement.</p>	<p>Will not be included, at this point in time we understand to define a fair price is a complex discussion to be handled.</p>
<p>4.1.1 - Is an external expert needed by a smallholder? Add guidance that this is optional in such cases?</p>	<p>Will be considered.</p>
<p>5.1.1 - On the Guidance, what is the rationale for the reference to the Austrian Codex Alimentarius as the basis? We suggest that it might it be better to refer to adherence, at a minimum, to the regulations of the country where production is occurring and those of the country of sale - with a more universal reference as a default in case there are no such regulations in force in those countries?</p>	<p>The codex is not the only reference and the operator can have a control system of this own as per the guidance. No modification will be made. Additionally there will be a specific Guideline for GMO sampling.</p>
<p>5.1.2 - We would suggest the creation of standardized affidavits that operators must use to attest to the non-GM origin of inputs that are not currently testable. We are willing to collaborate with ProTerra Foundation to help develop this kind of documentary support. Furthermore, on the Guidance, does this mean to say also that there is no tolerance for unapproved GMOs?</p>	<p>There is no tolerance to unapproved additives. Considering the wide application of ProTerra Standard we understand that it is not possible operate around a predefined list.</p>

<p>5.1.3 - Allowance to use any of the kinds of inputs listed should only be given if the CB explicitly approves on a case-by-case basis, and all such uses are documented by the operation. On the Guidance: Who decides if a time limit is necessary? (Or should "if necessary" just be deleted from the first sentence?) Also, this Guidance seems very Eurocentric. Could there be a more global reference as well?</p>	<p>Will be considered.</p>
<p>5.2.2 - On the Guidance, does "Industrial plants" mean facilities that produce potentially GMO feed? We find the example vague and potentially confusing and suggest it be clarified or deleted.</p>	<p>In the context of ProTerra "industrial plants" refers to level III. Clarification will be added.</p>
<p>7.1.3 - Include Level II on this one.</p>	<p>Will not be considered as we understand this requirement is not relevant for level II ( while several other new requirements for level two have been included).</p>
<p>10.1.2 - In the Guidance, all of the "may" documents should be required. Only having traceability within the confines of the operation is insufficient to ensure traceability. It must connect to the source and destination.</p>	<p>Significant modifications have been made do Principal 10 and most of the requirements have become CORE.</p>
<p>Definitions: - Chain of Custody - Only the 1st sentence here should be kept; the rest is part of the Standard above. Instead of calling it a "paper trail" might be better to call it "records, either in paper and/or digital form" or similar. -</p>	<p>Will be considered.</p>
<p>Dedicated - delete "non-GMO" -</p>	<p>Will be considered.</p>
<p>Indentured Servant - insert after "Typically" "in cases of indentured servitude" -</p>	<p>Will be considered.</p>
<p>Trade Unions - This one is out of alphabetical order.</p>	<p>Will be considered.</p>
<p>Include a criteria for GHG calculation ( to be based on PEFCR).</p>	<p>Will not be considered as we understand this would be a separate tool.</p>

SMETA auditing principles for CBs?	Will not be considered (note that for workers interview SMETA already considered).
Use of external expert under 4.2.1?	Will not be considered any change in this requirement. External expert was added as this topic is technically complex. Additionally an external expert gives an independently view and ensure that the restoration is feasible.
Make indicator 1.3.1 Core.	Will be considered.
Add definition of minimum wage and living wages as per ISEAL ( see next sheet for picture with the definitions ).	Will not be considered. Definition on Legal Minimum Wage already existed and at this point of time is what is feasible to be considered.
See references to international convention and applicable guidance in Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on Corporate Sustainability Due Diligence and amending Directive (EU) 2019/1937 and incorporate do V5 as applicable, adjusting principle 1 if necessary.	Will be considered as applicable ( at this point in time focus is on the EU regulation on deforestation. Appendix will also be updated with international conventions as appropriate.
Check The Commission's proposal for a Regulation on deforestation-free supply chains and consider as applicable.	Will be considered (refer to Principle 4 modifications and new requirements under 9.4).
Correct text in guidance of 10.1.2 ( add " is necessary").	The original text of this indicator was modified based on internal stakeholders feed back and the suggestion makes no sense anymore.
Based on ISEAL requirements: As part of the M&E system we have identified ProTerra initiatives, impacts, and outcomes; Review Standard to ensure that criteria are included to address all the defined social, environmental, and economic outcomes.	Based on the Monitoring and Evaluation document and benchmarking exercises, all key aspects are currently included/considered.
Add specifications for GMO for multi-ingredient products (admix/micro elements are/may be an exemption of the GMO testing).	ProTerra has developed a specific sampling procedure for GMO that we understand will cover this issues. Additionally there is indicator 5.1.2 that covers this topic.



Use satellite images.	Will be considered.
Must gather information on land use change during audits not only for the cut off date . Consider additional years to obtain data on 20 years period of no deforestation.	Will be considered ( new indicator 8.1.2).
Consider more data on GHG emissions.	Have included Level II report on GHG and land use changes. No additional change will be done. Understands that 8.1.1 covers the topic.
The certificate must bring information of the type of traceability used.	Will be considered.
Create a Due diligence Statement.	Will not be considered, this is outside the scope of the Standard.
Details on the description of the production ( in line with EU regulations).	Compliance with EU regulations, as applicable, have been considered under V5.
Use geolocation.	Will be considered.
Disclose Supplier and buyers info.	Will not be considered, this is outside the scope of the Standard.
Consider risk Criteria use as in the Eu regulation.	Compliance with EU regulations, as applicable, have been considered under V5.

<p>Language in the Guidance section is confusing and contradictory to 5.1.2 Core, i.e. 5.1.2's definition of adventitious threshold is not in sync with the Guidance.</p>	<p>Will not be considered. The referred guidance is only applicable in those situations where the producing country has no legal provision for adventitious presence of GMO.</p>
<p>Prescribe inclusion weight percentage of GMO/unknown genetic source inputs. There does not seem enough guidance on this principle for operations that do not have any Non-GMO Certification and not willing to get one.</p>	<p>Weight percentage of GMO/unknown genetic source inputs will not be considered. New elements have been included around GMO usage limits in the new GMO sampling procedure.</p>
<p>It seems in general there is not enough guidance for some of the principles, 5.2.2 being one example where the guidance just refers 'Auditor will decide what the level of compliance is'. With multiple Certifying Bodies clear implementation guidance will be important to ensure consistent implementation of the Standard.</p>	<p>The reference to the audit deciding was removed. In addition the guidance was rephrased and a guideline for sampling has been created to minimise inconsistency in implementations.</p>
<p>Overall Comment - with multiple certifying bodies implementing the Standard for consistent implementation of the Standard, elaborate guidance will be important for principles that are not tied to any specific national/international regulation.</p>	<p>Guideline for GMO sampling has been created to minimise inconsistency. Several text clarifications have been included hoping to improve clarity.</p>
<p>Some subpoints under Principle 2 Human Rights and responsible labour policies and practices would apply to the Level II operations, who should comply with these principles. The suggestion recommends considering compliance of Level II operations to principles related to Human Rights and Personnel principles.</p>	<p>Level II has been included in several requirements.</p>
<p>Needs to be updated, i.e. cloned sperm, milk derivatives, etc. Cloned sperm should be listed as prohibited inputs instead of risk input because there is no non-risk version of Cloned sperm and rGH.</p>	<p>Appendix A will include the need to check:  1) European Commission: Community register of GM food and feed;  2) ISAAA (International Service for the Acquisition of Agri-biotech Applications) GM Approval Data base/ GM Crops List; and  3) USDA Agricultural Marketing Service US Department of Agriculture: List of Bioengineered Foods in other to incorporated updates.</p>

<p>Add additional definitions in the new version of the standard to avoid confusion regarding Level I and Level II certifications.</p>	<p>Protocol will be adjusted as needed to avoid confusion. ProTerra understands that the definition is however very clear: Industrial processing refers to any operation that transforms the agricultural production output, such as a crushing plant or a food product manufacturer while level II is just Transport, Storage, Traders and Dealers (commercialization).</p>
<p>Process for collecting volume data and reported data should be specified to ensure consistent implementation of the Standard by all CBs.</p>	<p>Under version 4.1 there is a guideline associated to collecting ProTerra certified data. This will be added as an attachment of V5.</p>
<p>Clarification on the validity period of the certificate: 3 months from date of audit or 3 months from sign off of corrective actions.</p>	<p>This clarification will be provided under the ProTerra certification Protocol.</p>
<p>Most of the core principles seem to be applicable to Level II organisations as well. Suggestion - Include Level II for core principles 1 and 2.</p>	<p>Will be included as applicable. Several requirements have been extended to Level II.</p>
<p>The standard must study the possibility of forest regeneration in degraded areas after 2008, July. Considering the seal's reputation, through periodical monitoring or real-time of regenerated area until the complete recovery. Using as a basis "Area with polygon under monitoring".</p>	<p>Will be included (4.1.1).</p>
<p>Including the farm sampling plan considering territorial distances and displacement;</p>	<p>Sampling has to be representative while distance ( and associated displacement) is not necessarily representative. Reason why this will not be considered.</p>
<p>Wordings should be harmonized with texts and definitions from upcoming (and already existing) legislations like EUDR, LkSG (so far only German but there is more to come with Due Diligence directive etc).</p>	<p>There has been an alignment with EU deforestation free regulations.</p>
<p>Why not thinking about a time span in which the ProTerra certified organisation/farm/cooperative has to climb from 80% meeting the indicators up to 90%. For example after three years. This could be a way to implement progress for certified organisations also in the ProTerra standard.</p>	<p>ProTerra has a continues improvement requirement and V5 has many new indicators , including CORE. At this point in time we understand that challenges have been placed to organisations.</p>

Indicators of this principle should also belong to Level II (responsible labour policies, overtime regulations, equal opportunities, fair pricing, safety and health of workers etc. is surely relevant there as well).	Will be included as applicable.
How are those areas defined (FAO?) this should be clarified. How is the evidence for cultivation on areas that have not been deforested? Geodata? This should be a mandatory evidence at least for SG streams.	Definition have been based on EU regulation on deforestation free commodities for alignment. satellite imagery (georeferencing) is considered.
ProTerra standard should strengthen not only the conservation of existing Biodiversity than also the promotion of biodiversity should be asked more deeply. Examples could be the implementation of an Biodiversity-Management plan that shows the already high valued and conserved areas BUT also the plans which areas will be developed. Such a Management plan should also contain concrete landscape elements that promote sustainability in general like flower strips or nesting boxes. This indicator should therefore be designed specific and detailed.	The need of a biodiversity Management Plan was included under 4.2.1 as the creation of biodiversity area in farms should they be absent. Biodiversity Plan requirements may be detailed in future revisions.
Documentation should contain mandatory geodata of production area (field) in the future. The collection and forwarding of this information in the supply chain or the ProTerra chain of custody is essential for a participation in European market. Please consider definitions of EUDR (polygons from 4 ha, <4ha altitude and longitude with 6 decimals). Guidance should provide help of how to collect and proceed such data (especially for smallholders).	Will be included. In the case of smallholders that are part of the supply chain of industrial processors, the implementation of this indicator shall be supported by the processor.
Poderá unificar esses dois indicadores.	We understand that 2.6.2 is Core while 2.6.3 is not. So unification is not feasible.
Todos esses indicadores que tratam sobre retenção de registros podem se tornar um só.	As they relate to several different topics we opted to keep them separate. Additionally It would significantly change the structure of the document with no practical difference or benefits for the users.
Poderá unificar esses dois indicadores.	We understand that while one is Core, the other is not. So unification is not feasible additional there is no practical benefit for users.

<p>Poderá unificar esses dois indicadores.</p>	<p>We understand that while one is Core, the other is not. So unification is not feasible additional there is no practical benefit for users.</p>
<p>Poderá unificar esses dois indicadores.</p>	<p>There is no practical benefit for users while significantly impacting the structure of the document.</p>
<p>"Estabelecer limites e critérios claros para os casos de desmates, podendo ser limites mínimos que abonem aberturas para estabelecer atividades que não sejam as agrícolas. Ex: piscicultura, cascalheira, implantação de infraestrutura da fazenda (armazem, sede, etc) estradas, linhões ou qualquer outra atividade (que não seja agrícola) que possua licença ambiental emitida pelo órgão regulamentador competente.</p> <p>Nos casos de aberturas novas após a data de corte, estabelecer critérios e documentos, onde a fazenda/produtor se comprometa a não plantar soja convencional nessas áreas. Estes documentos poderiam ser: relatórios fotográficos feitos no período de safra, declarações, relatório de imagens de satélites, laudo técnico ou qualquer outro documento que evidencie o não plantio nas áreas de aberturas durante a safra.</p> <p>Em caso de áreas que tiveram o desmate antes da data de corte, e que foram novamente limpas após a data de corte, possam ser claramente consideradas aptas a atender ao requisito, desde que comprovada sua abertura inicial. Ou ainda, estabelecer um intervalo mínimo de pousio para a área que foi desmata antes da data de corte."</p>	<p>The limit is the cut off date and the standard applies to the entire farm not only cultivated areas. The exception you refer to may be considered on a case to case basis, however, for exports to Europe such interventions may be a limitation. Satellite imagery will be clearly considered as part of ProTerra assessment what will minimise issues on opening of areas dates. Please note the definition of forest under the EU regulation that will be adopted by ProTerra. Additional guidance will be provided and recovery criteria. Guidance on restoration will be added.</p>
<p>Trazer clareza ao indicador quanto ao porquê da exclusão apenas da "mutagenese aleatória" e não da "edição gênica".</p>	<p>More clarity and guidance will be provided based on the outcome of recent discussions around relevant GMO regulations.</p>
<p>Poderá unificar esses dois indicadores considerando que para que aconteça a segregação, o manuseio, a armazenagem e o descarte do resíduo perigoso, as estruturas devem estar corretas (o que solicita o indicador 6.1.2).</p>	<p>There is no practical benefit for users while significantly impacting the structure of the document. Additionally we clearly wish to make a distinction between hazardous waste and hazardous materials (that include beyond waste).</p>

Poderá unificar esses dois indicadores.	There is no practical benefit for users while significantly impacting the structure of the document.
Poderá incluir um indicador que estabeleça diretrizes para o controle e registro do uso de biológicos como forma de redução do uso de produtos tóxicos e poluentes.	In the guidance it was considered that in the case of usage of bio controls associated regulations must be met. The Standard already referred to biological control as guidance.
Poderá unificar esses dois indicadores, considerando que os três retratam cuidados com os métodos, locais e distâncias de aplicação, podendo separar em aplicação terrestre e aérea. Sugestão de criar em tópicos as diretrizes para aplicação correta, incluindo também os distanciamentos mínimos de povoados, mananciais, casas, sedes, vegetação nativa, etc, conforme legislações nacionais aplicáveis para a operação.	The application of fertilisers was explicitly included under 9.7.1. Distances, already included under ProTerra, relate more to pesticide application. No modification will be made.
Não seria necessário esse item se considerar as aplicações aéreas serão regulamentadas conforme sugerido no item anterior.	As above.
Not explicit reference to the protection of Savannas.	Will be made explicit reference ( 4.1.1).
Need to include the need of polygons of land lots.	Will be made explicit reference guidance ( 4.1.1).
Sampling should include not only farm, but also any Core supplier.	Will be included.
In opening text "Deforestation is one of the primary causes of climate change". Change to "Deforestation and conversion of natural habitats are one of the primary causes of climate change, biodiversity loss, and loss of ecosystem services." Also add some opening text about the new Principal recommended below (4.4).	Text will be improved. To avoid confusion with the EU definition of deforestation we will make no changes. Introductory texts are not requirement of the Standard.

<p>Add savannah or similar biotope to cover cerrado / gran chaco.</p>	<p>Will be made explicit reference ( 4.1.1).</p>
<p>Add a new core criterion under principal 4. Could be 4.4 "Commitment to measuring and reducing environmental footprint of farming practices".  Sub-criterion 4.4.1 "Certified organizations shall perform a life cycle assessment (LCA) according to the ProTerra LCA quality standards in appendix XYZ (need a working group on this - I am happy to lead it) or submit primary data allowing ProTerra to perform an LCA on behalf of the certified organization. If the certified organization prefers to submit primary data to ProTerra, this data transaction shall occur at a minimum during the audit process, but can also be voluntarily submitted on a yearly basis. 4.4.2 "The certified organization has an action plan to continuously reduce the key environmental impacts identified in the LCA (such as climate change, ecotoxicity, water use, eutrophication potential, resource depletion, etc.)" The action plan shall include baseline results, time-based improvement targets, actions, milestones, progress, and identify knowledge gaps so that ProTerra may provide or recommend amendments, remedies, or technical assistance as needed. 4.4.3 "The certified organization includes in the action plan, a report section addressing the potential of including regenerative farming practices to improve the environmental footprint of the farm (see criterion 9.1.1). 4.4.3 is designed to raise awareness and improve knowledge of the potential environmental and economic benefits of regenerative farming practices using the LCA methodology".</p>	<p>This currently outside the scope of ProTerra. Can be tackled as a separate initiative.</p>
<p>DELETE. Now covered by 4.4.</p>	<p>As above.</p>
<p>For 8.2.1 - Add hydropower, green hydrogen, and biomass as types of renewable energy.</p>	<p>The examples given in the guidance did not intent to be exhaustive. Nevertheless, will be added. Green Hydrogen is not excluded but still a faraway reality in most countries.</p>

<p>Recommend some positive language rather than minimizing negatives. For example: "Good agricultural practices are fundamental to maximize the benefits of agricultural activities, while minimizing negative impacts on the health of the environment, workers and neighbouring communities. This principle aims to support organisations to maximize soil health, while reducing and optimizing the use of agricultural inputs, especially the use of pesticides, and other toxic / polluting materials."</p>	<p>Will be considered.</p>
<p>9.1.1 - Add regenerative farming practices here. Such as: "Certified organisations shall adopt good agricultural practices, and demonstrate knowledge of, and preferentially practice regenerative agricultural practices. Examples of regenerative agricultural practices can be found in the ProTerra Regenerative Agriculture guide in Appendix (XYZ). Demonstration of regenerative agriculture techniques can be achieved through training manuals, feasibility studies, participation in research projects, or other clear examples of capacity building around the subject.</p>	<p>Will be considered the use of regenerative and agroforestry agriculture practices.</p>
<p>9.3.2 (recommend a new criterion). The certified organisation measures soil health using key performance indicators, including soil organic matter (SOM), soil organic carbon (SOC), nutrient levels (N, P, K), and other relevant indicators. Soil testing shall be performed on a yearly basis before fertilizer application with adequate coverage of productive areas. The purpose of these tests is to allow for the precise application of agricultural inputs, such as fertilizer and soil conditioning agents, and improve knowledge around how soil health impacts other production parameters critical to the farmer (such as yields, crop nutritional content, pests, losses, etc.).Soil health indicators shall be registered annually and included in 9.4.3.</p>	<p>Will be considered under 9.3.3.</p>
<p>"Taking advantage of the public consultation process towards updating the ProTerra Standard V4.1, ASR Group wants to request the following items to be considered/added to the audit questionnaires (it's possible that questions outlined below might be already part of the questionnaires): ( a list is questions follows)."</p>	<p>The audit questions are prepared by the Certification Bodies and are not part of the ProTerra Standard or Certification Protocol. The request will be forwarded to CB. It is highlighted that many of the aspects' suggested are part of or related to a ProTerra requirements and are checked during the certification audit already.</p>
<p>Need to add regenerative agriculture practices.</p>	<p>Will be considered the use of regenerative and agroforestry agriculture practices.</p>



<p>Include measurement of CO2 emissions.</p>	<p>The existing 8.1.1 refers to GHG inventory applicable to large agricultural areas (this is in line with scope 1,2 and 3 approach used under several calculation tools). This topic is maintained under version 5 with additional requirements being considered.</p>
<p>Need to add Crop rotation.</p>	<p>The existing version considered this topic that will be maintained under V5.</p>
<p>Need to add Organic and Regenerative organic certification.</p>	<p>While both topics are dealt with under version 4.1 and will be maintained under V5, making additional certification necessary under ProTerra is not under consideration at this point in time.</p>
<p>Need to add Cover crops.</p>	<p>The existing version considered this topic that will be maintained under V5.</p>