



OUTCOME OF THE PUBLIC CONSULTATION OF THE PROTERRA REGENERATIVE AGRICULTURE MODULE (PROTERRA REGENERA)

29-09-2025



Suggestion / consideration	Proterra Answer
How has SAI Platform been involved in the development of this Module?	SAI's guidelines, publicly available, have been used as technical reference for the development of the Standard (https://saiplatform.org/regenerating-together-programme).
How compatible is this module with the current SAI RTF?	A specific benchmarking exercise has not yet been developed at this point in time. Once the final version of PT Regenera is completed such comparison can be done and results can be made public. As of now, both "standards" share impact areas that must be addresses such as - Soil Health, Water Management , Biodiversity preservation and enhancement and climate change mitigation.
Where can I find the gap analysis between this module and other RegenAg assessments (ROC, SAI RTF, FSA etc)	As above. Only when the final version of ProTerra Regenera is ready will a benchmark be possible.
The module does not mention anything about a context analysis. without it, the farm does not necessarily know where he should focus on. It could lead to Farms randomly choosing practices that have little or no effect on their farm. We must be careful here, as often if the chose practices 'fail' or presente negative effects, the farm can easily write off the practice thinking it is useless.	While we understand your concern, ProTerra Regenera is designed around Principles and requirements that "guide" the farmer on what to focus on beyond Proterra Standard requirements. Note that Proterra Regenera is not a stand alone standard, it is actually a complement to ProTerra Standard V5 or ProTerra MRV. All Standards are very clear in what is mandatory (core) and what is not.

<p>waiving the reduction of non organic inputs should be supported by reasoning.</p>	<p>This will be included in the final version of the Module.</p>
<p>Proterra Regenra document is very crisp and clear , one thing I would like to highlight here, in case of India where small holder farmers are there, does the 30% of total cultivable area rule implies here as well. Or is there any other provision imply in Indian context.</p>	<p>At this point in time no specific guidance for the implementation of ProTerra Regenra in the smallholder context has been considered. So initially the 30% applies. Once the Standard is finalised, the ProTerra Foundation may evaluate specific guidance for smallholders should this be deemed necessary.</p>
<p>The program's ineligibility requirements are broad and do not specify how they will be evaluated.</p>	<p>We believe requirements are very specific (refer to the Appendixes). The verification of each of these aspects is done in the context of a certification/verification audit. Please keep in mind that PT Regenra is a complementary standard to both PT V5 and PT MRV and all PT V5 and PT MRV complementary documentation such as Audit Protocols, including audit procedures and Certification Body selection criteria to cite a few additional documents are fully applicable. This is informed under the topic <i>Applicability</i> of the Regenra.</p>

<p>Leaving it up to each organization to choose what to evaluate is a point of caution. For the assessment of a general scenario, if the same items are not assessed, I don't see the possibility of generating a solid position on how the standard is progressing.</p>	<p>It is not about what to evaluated (these are very clearly indicated in the requirements, refer to Appendix A - ProTerra Regenera requirements for organisations seeking certification under PT V5 and Appendix B - ProTerra Regenera requirements for organisations seeking verification under PT MRV) , what is up to the organisation is defining KPI (key performance indicators that are quantitative; how much). Each organisation must therefore define its own set of KPIs based on a plausible, realistic and technically sound aspects. Consistency of the KPIs defined by the organisation will be confirmed during the first certification audit by the CB. Inadequate KPIs may result in non-compliance, which must be corrected for the next audit cycle if the farm wishes to remain in the ProTerra Regenera programme. Continuous improvement is the number one requirements under ProTerra Regenera (checked during the audit, and this considers for example how KPI have evolved overtime. This ensures progress.</p>
<p>Considering that the farm can plant conventional soybeans one year and not plant them the next, does this mean that the year it does not plant conventional soybeans will not be audited by Proterra, and therefore it will lose the ProTerra Regenera certificate, and consequently the monitoring of the indicators?</p>	<p>ProTerra Regenera is a add-on Module to either PT V5 or PT MRV, both standard require annual audits. The Regenera Module is not an independently verifiable tool. PT V5 is a non GMO standard while PT MRV is not. In order to keep the Regenera status, a yearly audit is required. However, monitoring indicators can, and should, be maintained by the organisation if in the future it wishes to resume its status (only possible if successfully audited).</p>

<p>Evaluating the increase in organic matter over time is valid, but the increase in OM tends to slow down over time, especially in soils that have already undergone recovery processes. It would be advisable to evaluate with integrated indicators.</p>	<p>This considerations will be included in the final version of the Module.</p>
<p>To develop and implement a nutrient management plan cause impacts on fertilization decisions and the client's production costs, in addition to the technical competence on the part of the organization (agronomists for technical assessment).</p>	<p>Production cost can be affected by the implementation of improvement to production practices, nevertheless these same improved production practices are what will ensure resilience overtime. Steps such as shifting from synthetic to organic inputs, implementing data-driven nutrient management, building internal technical capacity and collaborating with clients may help this transition, lower the investment and create resilience.</p>
<p>Applying 30% of the area to each activity may not be the idea, just as living fences on 30% of the area are not essential for regeneration and are not viable for production.</p>	<p>It reads "the initial certification/verification, at least the 30% ". Considering the requirement of continuous improvement this is to be increased on a year to year basis. How much? That depends on the specific reality of the organisation, but has to be reasonable and will be audited.</p>

<p>Is there a minimum deadline for the farm to reach 100% of the score or is it allowed to remain at intermediate levels, such as 80%?</p> <p>What criteria will be used to count the score?</p> <p>Does the presence of an indicator already generate a score or are there specific subdivisions for awarding points within each indicator?</p>	<p>There is no deadline. Considering the requirement of continues improvement this is to be increased on a year to year basis. How fast? That depends on the specific reality of the organisation, but has to be reasonable and will be audited. The criteria is based on the total number of core and non core requirements in the standard:</p> <ul style="list-style-type: none"> • Bronze level – an organisation that meets all the core requirements and at least 30% of the non-core requirements. • Silver level – an organisation that meets all the core requirements and at least 60% of the non-core requirements. • Gold level – an organisation that meets all the core requirements and at least 80% of the non-core requirements. <p>Core requirements under PT V5 are also core requirements under ProTerra Regenera. Under PT MRV, those that are core for the sake of ProTerra Regenera are clearly indicated in the document. All indicators must be fully met.</p>
<p>Can the organization define the KPIs, align them with the OC and monitor them continuously, with annual updates?</p>	<p>That is the idea.</p>

<p>Do regenerative practices have to cover the entire area of the farm? If no conventional soy is grown the following year, does the farm cease to be audited by ProTerra, lose its Regenera certificate and stop monitoring the indicators?</p>	<p>The entire area is not mandatory in the initial certification/verifications, but overtime increase in area should be demonstrated, based on continuous improvement, and ultimately should be extended to the entire farm. For some of the indicators a 30% of the area is required at the initial certification. How fast should the process go? That depends on the specific reality of the organization, but has to be reasonable, and will be audited. ProTerra Regenera is a add-on to either PT V5 or PT MRV, both standard require annual audits. The Regenera Module is not an independently verifiable tool. PT V5 is a non GMO standard while PT MRV is not. In order to keep the Regenera status, a yearly audit is required. However, monitoring indicators can, and should, be maintained by the organisation if in the future it wishes to resume its status (only possible if successfully audited).</p>
<p>Specify the formats accepted for proof: photographic records, digital systems or manual spreadsheets.</p>	<p>This is defined and cross checked by the Certification Body on a case to case basis.</p>
<p>Is it necessary to present only the indicators defined by ProTerra or is it also mandatory to define specific KPIs?</p> <p>Will the evidence required for Regenera be the same as that used in the ProTerra Standard audit?</p>	<p>KPIs should be defined and maintained (so yes it is mandatory). Typically yes, evidences are the same, only on those cases a specific requirement exists only under PT Regenera (not the case when the topic is <i>Management and appropriate disposal of non-hazardous waste</i>).</p>

Clarify the relationship between the planting cycles of CO soy on the farm and the validity of the Regenera certificate, in order to define the applicable monitoring periods.	ProTerra Regenera is a add-on to either PT V5 or PT MRV, both standard require annual audits. The regenerate Module is not an independently verifiable tool. PT V5 is a non GMO standard while PT MRV is not. In order to keep the Regenera status, a yearly audit is required. However, monitoring indicators can, and should, be maintained by the organisation if in the future it wishes to resume its status (only possible if successfully audited). Monitoring periods have to be defined by the organization based in its reality.
The word 'adequally' is not correct; it should be replaced with 'adequately'. Also, 'Economic operation' should be changed to 'Economic operator'.	Correction made.
duplicate "at least"	Correction made.
The requirement describes the indicators 6.1.3 and 6.1.4. However, there is no 6.1.4 in the ProTerra Standard V5.0	6.1.4 under version 5.0 reads :CORE - Certified organisations shall ensure that there is no run-off of wastewater, oil and oil spills, chemical and chemical residues, minerals and organic substances. Please refer to page 41.
Change "Alternatively, organisations demonstrated the application of equivalent techniques for protecting soil quality" to "Alternatively, organisations can demonstrate the application of equivalent techniques for protecting soil quality".	Correction to the text was made.
duplicate "at least"	Correction made.

It's unclear whether full ground cover is required across all areas during periods of high erosion risk, or only in areas that are already classified as high erosion risk.	Clarification made.
What does 'properly managed' refer to in the sentence: 'Manure and its application must be properly managed'?	The sentence reads "Manure and its application must be properly managed". So both manure and manure application must be properly managed.
It was noted that the KPIs should be defined and maintained. However, in my view, the term "shall" would be more appropriate, as establishing KPIs is one of the core objectives of the add-on.	Correction to the text was made.
Is it necessary for the ProTerra or MRV certification area to be the same as the RegenAg add-on area? I ask because there may be areas eligible for ProTerra but not for the RegenAg add-on, such as those where fire is used for harvesting, when it is applicable by local and national law. Would this be considered cherry-picking?	Yes it is necessary for ProTerra Regenera that it is associated to the same area under ProTerra V5 or PT MRV. ProTerra Regenera is a add-on to either PT V5 or PT MRV. The regenerate Module is not an independently verifiable tool. Should burning vegetation be practised by an organisation certified organisations shall develop alternative methods for future use. This is a crucial element in the continuous improvement of the implementation.