

CLAC's STANDARDS COORDINATION

REVIEW OF CRITERIA FOR SPOs (2nd Round of Consultation)

RESULTS REPORT JULY 13, 2018

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1. INTRODUCTION

Only Fairtrade small producers' organizations were invited to participate in this consultation. The contents of this report are based on results obtained through workshops for gathering collective opinions and in which there were representatives from all products.

CLAC worked intensively to prepare for this second round of consultation. Following are only some of the activities carried out: participation in a meeting of the project team in Germany, with discussion on the contents and methodology for the consultation document; preparation of a methodological package for conducting the consultation in Latin America; a joint workshop (National Networks, Board of Directors, Standards Committee and Regional Networks) for analyzing the questionnaire to be used in the consultation, observing the critical points by products and by countries; training for the operations team and National Networks on the methodology and the workshops for completing the consultation.

As a result of all these efforts, 20 workshops were held in 15 countries. Participating were a total of 333 organizations (48%), just below the participation in the first round of consultation, with 353 organizations (63%). The organizations were represented by 626 delegates, of whom 22% (137) were women and 78% (486) were men. There is a total of 689 Fairtrade organizations in these 15 countries. It is important to mention the excellent work carried out by the National Networks and the operations team to ensure the success of this consultation.

Twelve topics were presented for debate in the consultation, with a total of 41 questions to answer. A final topic (13th) was presented with the aim of collecting comments/proposals beyond the contents of the consultation. Of the 12 topics, those generating the most debate were Topics 1, 3, 8 and 9. Of the 41 questions, 18 generated contradicting responses or responses that were divergent or concerning for CLAC. These questions were in Topics 1 (1.2 & 1.4), 2 (2.2 & 2.3), 3 (all of them, 1 to 9), 7 (7.1), 8 (8.2 & 8.4), 9 (9.1), and 10 (10.2).

CLAC is confident that the Standards Committee carefully considers the number of requirements that small-scale producers' organizations must fulfill, to prevent them from becoming distracted from their primary mission, which is to obtain markets for their products that are in accordance with Fairtrade terms. In the same way it is hoped that the requirements in the standard are written in a simple, clear manner and in a way that does not leave room for different interpretations by auditors.

2. EXECUTIVE SUMMARY

It has been a priority for CLAC since the beginning of this review project to achieve a standard for SPOs that is well-established, simple and clear; that presents solutions to problems associated with standards; and that becomes a development tool for organizations and their members. This extensive report on results from the second round of consultation demonstrates the tremendous work carried out, but also the complexity of the topics addressed. It is difficult to adapt a standard to so many different realities without considering their particularities. There have been long hours of discussion. For some topics it was possible to progress towards a clear and nearly unified response or at least one representing a clear majority. For other topics, the varying realities for different countries and different products mean that opinions are spread out, and there is uncertainty and concern over a final decision, which could potentially lead to non-compliance by many organizations, and even the possibility of not remaining in the system. Of these topics, a satisfactory solution is possible for many of them if they are addressed on the basis of the realities for products/countries.

The following section presents an overall look at the responses given to each topic by those participating in the consultation.

Topic 1: SPO definition

This definition encompasses 4 closely-related items. It is clear there is great interest in increasing the percentage of small-scale producers within SPOs. There is divergence, however, in terms of the number, the time period for such an increase to enter into effect, and the types of products. Respondents propose that limits on land size, indicators for defining a small-scale producer and the percentages of sales volumes be determined in accordance with the actual situation for each product. This is because what could work for one product could lead to a crisis for another.

Topic 2: Management of production practices

The proposal in this topic to include a farm assessment tool as described in the criteria generated a great deal of uncertainty and rejection, as did the extension of the IMS to first-grade organizations. The explanations emphasize the need to recognize what is already being done in organizations.

Topic 3: Environmental development

The most controversial topics were Topic 3 and Topic 1. The rate of rejection for the 9 requirements in Topic 3 was high. The arguments presented show concern over the additional costs, the requirements from external experts and governments, and the burden being placed exclusively on producers. Respondents propose that environmental requirements be reduced to a minimum, and that responsibility for the costs of compliance with these requirements be shared along the commercial chain.

Topic 4: Gender equality and women's empowerment

A wide majority agreed with this requirement.

Topic 5: Development potential

The majority of were clearly in agreement.

Topic 6: SPO governance

Although not all responses were the same, the vote by the majority was clearly identified.

Topic 7: Fairtrade Development Plan and Premium use

Of the 4 items in this topic, the one that was rejected was the proposal to create a new committee for administering the premium. It is argued that this committee is not necessary because organizations already have a structure in place for this purpose. Creating another committee would lead to a contradiction with the governance team (i.e. board).

Topic 8: Workers in SPOs

A great deal of concern was expressed around the proposal to reduce the significant number of workers to ten, as this would mean that many more producers would need to comply with this requirement. This would increase the risk of suspension since it is difficult for organizations to strictly monitor the number of workers hired by their members.

Topic 9: National legislation

This topic led to a great deal of discussion regarding the risk represented by this requirement. Countries have their control mechanisms. This is not FLOCert's responsibility and in many countries not even the government complies with all legislation. This requirement creates uncertainty around how it would be audited.

Topic 10: Fostering continuous improvement

The critical point in this topic on fostering continuous improvement is the proposal to increase certification scores, since it fails to recognize that organizations cannot always maintain linear development. Organizations confront situations that limit their development and sometimes cause setbacks. There is interest in encouragement for continuous improvement but not by a requirement to increase certification scores.

Topic 11: Role of traders and Topic 12: Trading with integrity

No objections were expressed for either of these two topics.

3. NEXT STEPS IN CONSULTATION PROJECT IN 2018

Approval of report on consultation results.	July 13-15
CLAC shares the approved report with all organizations participating in the consultation, and also other Producer Networks.	July 15-20
CLAC receives overall report (synopsis) of consultation results from Fairtrade International's Standards Unit.	October
Webinar for analyzing overall results.	October-November
CLAC sends feedback on report to Standards Unit.	November
Approval of standard at Fairtrade International's Standards Committee meeting in November 2018.	Last week of November

4. METHODOLOGY FOR CONSULTATION PROCESS

Preparation

Package of tools for conducting each workshop (working groups, plenary sessions, report format) delivered to team of facilitators. Conducting joint workshop (Directors, Standards Committee, National Networks, and part of operations team) to discuss the contents of the consultation and to indicate the points that may be the critical ones. Also, to test the workshop methodology. Training webinar on methodology, conducted with the entire operations team and National Networks' personnel. Monitoring schedule of workshops.

Workshops

Organized and facilitated by a team consisting of Directors of the National Network and CLAC's operations team. Each workshop lasting a day and a half. Two rounds of working groups and their respective plenary sessions. In the first round, Topic 1 was discussed in all of the working groups, and in addition, each working group addressed another topic (two in total). Then in the second round, each working group addressed one topic. During the plenary sessions, when it was not possible to reach a consensus in the responses, a vote was taken. Each organization had one vote. All of the positions, including those held by a minority, were recorded in the report on each workshop. A report for each country was received by CLAC's Standards Committee, together with a letter from the corresponding National Network, corroborating the results.

After workshops

Data from responses to specific questions were grouped into an Excel document. Open questions that contained texts were grouped by country into a Word document. In both documents the contents of the responses coming from each country were maintained intact. Lastly, a results report was prepared, highlighting the total responses according to each option.

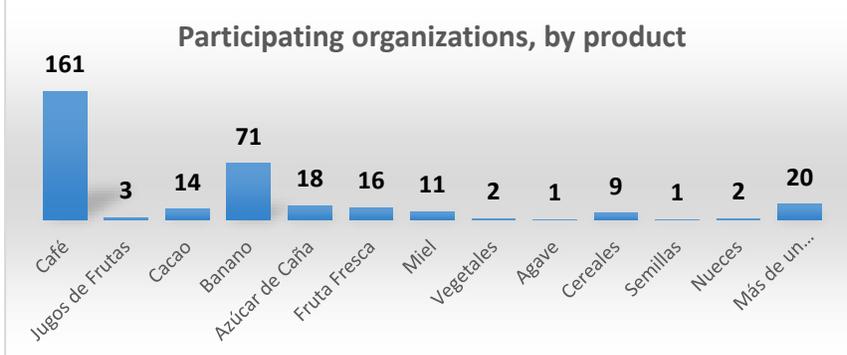
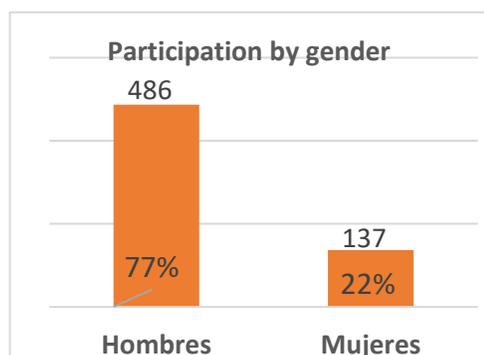
Analysis of results and approval of report, in a joint meeting with participation by representatives of CLAC's National Networks (*Coordinadoras Nacionales—CNs*), Board of Directors (*Consejo de Dirección—CD*) and Standards Committee (*Comisión de Estándares—CECLAC*). Observations obtained at this meeting appear in the report separately from the results from workshops.

The final report will be shared with all National Networks, the Board of Directors, the organizations participating in the consultation, and other Producer Networks.

5. PARTICIPANTS

Total numbers of FT organizations and participants, by country

Country	CU	RD	EC	GU	ME	SA	CO	PA	CRP	CH	BR	ARU	PE	BO	NI
Total number of FT organizations	4	32	40	19	65	5	108	12	19	12	44	7	260	26	36
Total number of participating organizations	4	28	21	16	23	4	50	9	14	9	16	7	101	19	12
% of participation	100%	88%	53%	84%	35%	80%	46%	75%	74%	75%	36%	100%	39%	73%	33%



6. RESULTS FROM CONSULTATION, BY TOPIC

Results from the consultation are presented by topic, bringing together the responses from the 15 countries, precisely as they were presented by the organizations. First, the response option given the most frequently is presented, followed by the other response options, in descending order. Then, the explanations offered by participants for voting only partly in agreement or in disagreement are presented. Lastly, proposals for solutions are presented. In the case of topics receiving concerning results (with contradicting results), the overall assessment obtained at the joint meeting is included and is presented before the responses from the workshops. This assessment is based, above all, on an analysis of where the most votes were concentrated.

The total number of participating organizations was 333, but this number is not reflected in all of the responses, since according to those registering votes, some organizations abstained from voting or arrived late to the workshop, and

others left the workshop temporarily and then rejoined. Also, in one of the countries, the decision was made that only 16 of the 21 organizations that arrived at the workshop had the right to vote. It is important to clarify here that each organization had one vote, even if more than one participant represented the organization at the workshop.

Topic 1: SPO definition

1.1 Increase the number of members that need to be small-scale farmers for an organization to be a small-scale producer organization from 50% to 75%.

In general there is overall interest in increasing the percentage of small-scale producers in SPOs. There are, however, differences in terms of the specific number, the time period in which organizations must comply, and the types of products.

Most (144) organizations strongly agree with this increase. However, a high number of organizations expressed disagreement (85) and others were only partially in agreement (78), and it was not a relevant point for 4 organizations.

Explanations for disagreement or partial agreement:

- Medium and large producers are those that maintain sales volumes, and this supports small producers.
- Orange producers expressed concern that there are no producers with less than 12 hectares, unlike the case for products such as coffee. Their market demands increasing levels of traceability, and for this reason, they need a viable minimum volume for processing. Since oranges are a perishable product, they cannot be maintained in warehouses for extended periods of time.
- There is interest in an increase, but not at the proportion proposed, and not without taking into consideration the particularities of some products.
- It would be discriminatory to remove members that have not committed any infringement. This would contradict with the principles of solidarity and the values of cooperation.
- It is necessary to first define a small-scale farmer. If the idea is to increase the %, then small, medium and large-scale farmers should be defined on the basis of productivity.
- Wine grape producers are on the decline due to emigration of young people and low productivity. If producers are removed as a result of this increase, organizations will collapse.
- In Argentina and Uruguay it is illegal to exclude producers for these reasons. A 60-40 proposal was very positively assessed in nearly all of the countries in which disagreement was expressed.
- This could lead to bad practices in the future.
- The demand for products is not covered by small farmers.
- Leave the percentage as it is: 50-50.

Proposals:

That the increase be implemented gradually; that the percentage be 60-40; and that policies be established for specific cases of certain products.

1.2. Introduce the following maximum (cultivated) land size of a farmer growing a Fairtrade crop in a small-scale producer organization: up to a maximum of 3 times the average land size of all the members.

Joint Meeting: the recommendation is for the maximum size to be established by product, and in this way large producers in SPOs will be excluded.

The majority (151) disagrees with this proposal, while 117 strongly agree, 39 partially agree, and it is not relevant for 4 organizations. Total responses: 311. Generally, interest is expressed in establishing a size limit, but the differences are expressed with regard to how to implement the limit and on the basis of what criteria.

Explanations for disagreement and partial agreement:

- Must be developed specifically for each product.
- The average size would be very low for some products and for some SPOs, in which producers are very small. It would foster inequality among SPOs in the same sector, favoring organizations with the higher averages.
- This proposal is not in accordance with reality; it is discriminatory. It excludes, not includes.
- It goes against an entrepreneurial spirit.
- Farm size should not define the limit.
- The limit established by the government in some countries should be taken into consideration.
- That 25% of members may have a land plot that is above the average for the other 75% of members.
- This proposal contradicts 1.1.
- This proposal limits the growth of SPO members.
- In Argentina and Uruguay it is illegal to exclude producers for these reasons. Members could file a legal claim against a Cooperative.
- This requirement is more restrictive for wine grapes than for fresh fruit. SPOs are already affected in organizational, economic and financial terms. If approved, this requirement would jeopardize what has been achieved through certification.
- This requirement will not permit small producers to grow.

Alternative suggestions

That the criteria remain the same in the case of bananas and fresh fruit. In the case of other products, that an average be established for each country.

The limit should be established in accordance with each product.

Take into consideration that the land area does not always coincide with the area in which a FT-certified product is being produced.

That this requirement not be approved because local legislation does not include this criterion. Producers can have large land areas, but low production/productivity.

Establish the limit according to variables associated with the productivity of crops/harvests.

That participation by large producers be limited by volume.

That size be limited to 15 hectares.

That the limit be a specific amount, not an average.

Use the average already established in each country, or establish a limit for each country.

Increase the average land cultivated by all members by 5 times.

That the limit be established in accordance with family income.

1.3. Rephrase guidance in requirement 1.2.1. to clarify what Fairtrade understands as a small-scale farmer and under what cases there may be variations.

The majority strongly agree (221), some partially agree (52) and others disagree (33). Total responses: 306. The proposed indicators are: the farm is managed by members and their families; farm work is done mostly by members and their families; and they do not hire workers all year round (exceptions would be made for reasons of age or incapacity).

Explanations for disagreement or partial agreement:

In the explanations presented, there is some confusion around a small producer not being able to hire labor. The indicator refers to permanent workers.

- Small banana producers cannot manage their farms without hiring permanent workers.
- This requirement is linked to the requirement on land size. There are cases and limiting factors in which it is necessary to hire permanent workers.
- There are major differences in the situations among products and among countries, and these signify that indicators cannot be applied in the same way. Creating specific criteria for specific products and countries is indispensable.
- In Argentina grapes and olives are grown together. There is only an indicator for grapes. If this requirement is approved, small grape producers would not qualify as small producers for olives because they hire workers.
- Growing grapes is labor intensive, and if land size is at 7 hectares or larger, it is necessary to hire one worker. This change would limit the growth in fair trade for other products within the fruit category or others in the cases of Argentina and Uruguay.
- The concept of a small-scale producer is not clear.

Proposals:

Change the text to 1 permanent worker.

The definition of a small producer should be specified by product and by region/country.

There should be a CLEAR definition of the conditions under which a member may hire a permanent worker for reasons of age, illness or disability, to avoid these conditions being subject to interpretation.

The indicator should be defined with participation by local stakeholders.

If you think that for your product/country an indicator that defines a small-scale farmer would need to be defined, please explain why:

Review the maximum number of workers. Generally, small producers do not hire permanent workers (ME).

Create a basic indicator. Taking into consideration the annual income for the property. Respect the indicators that the country's credit institutions have as a reference for offering credit to producers and family members (BR).

Establish indicators by product (CO) and determine the upper limit (EC & CR).

Indicator for wine grapes should be updated and olives should be added. The local definition of "COVIAR" is proposed: "Producers of wine grapes, mosto, table grapes and raisins whose total cultivated land area with vineyards and other permanent crops were up to 20 hectares (possibility of including producers of up to 30 hectares) and for whom at least 50% of their income comes from wine-growing."

1.4. Increase from 50% to 75% the amount of volume sold that needs to come from small-scale farmers.

Joint meeting: 75% is very high. For the sustainability of sales in SPOs, an increase from 50% to 60% is recommended. Also, a definition is needed for small-scale producers and medium-scale producers for all products. In this way large producers can be excluded from SPOs.

Respondents disagreed (126), strongly agreed (125), partial agreed (52) and 6 responded that this topic was not relevant for them. There were clear differences in the responses to this question. There was only one vote difference between the votes for disagreement and the votes for strong agreement.

Explanations for disagreement and partial agreement:

- This should be linked to the 80/20 ratio. Specifically, at least 80% of Fair trade volume should be produced by small producers.
- There should be rules for each product. Participation by producers is limited. Coffee is no longer traded because the percentage is restricted.

- It is necessary to analyze whether it will be possible to comply with business contracts with this requirement.
- This criterion excludes. There are small producers in cooperatives with very small producers who will be affected if this is approved.
- In the case of wine grapes, this restricts commitments already made. Small producers do not have the varieties requested in Fairtrade markets. The volume traded by medium-scale and large-scale producers contributes by obtaining more contracts and thus contributes to the premium that benefits small-scale producers. If volumes are reduced, this benefit will be reduced for the entire organization.
- In disagreement because this could place SPOs at risk for not complying with the Fair Trade contracts they manage to sign, if they fail to obtain the required volume.

Proposals:

Maintain the current 50-50.

Increase should be from 50% to 60%.

The wording in the requirement is correct, but we would add: “if the demand for the Fairtrade product is greater than what small-scale producers can supply, it will be necessary to supply the product from larger producers.”

It is important to consider points 1.1, 1.2 and 1.3 comprehensively because they are very closely associated. Guidelines for “democratic control” can be established to cover all the organizations and to emphasize “product” in every country.

Do you think this change is necessary, given the changes proposed in requirement 1.2.1? YES NO

Yes (147), No (66).

The change is necessary, but more discussion is needed.

Take into consideration that volume in the case of honey is defined at the end of the season.

1.5. The proposed transition period for the changes in requirements 1.2.1 and 1.2.2 is two years.

A great majority (200) strongly agrees with the two-year transition period, while 80 disagree, 22 partially agree and this point is not relevant for 6 organizations. Total: 308 responses.

Explanations for disagreement and partial agreement:

- For most of those who disagree with the transition period proposed, their disagreement is with the requirements.
- We are in total disagreement with the change in the criteria, and so the transition time is irrelevant.
- We disagree with the way the criteria would be structured three times the average, and thus this question does not apply.
- It is impossible to adapt to the requirements based on the arguments already presented regarding the legal conflict and technical limitation to be fulfilled.

Proposals

That the minimum be 3 years.

Topic 2: Management of production practices.

2.1. Change the focus from compliance to management in the relevant parts of the production chapter of the standard. Intention and scope of Chapter 3 and Intention and scope of management of production practices (section 3.1).

Strongly agree (a majority, with 234); partially agree (55); and disagree (22). Total responses: 311.

Explanations for disagreement and partial agreement:

- There are doubts with regard to the following points: 1. Definition of what an IMS is, and 2. Proposal for what an IMS is. We agree that it will improve our activities, but we are not in a situation in which we can implement it quickly.
- The term (IMS) is subjective, because [between] what is known as an IMS and an ICS, an IMS is more robust and requires more depth.
- The IMS is a good tool for making improvements, but its application should be adapted to the real possibilities of SPOs, especially since the additional generated by Fairtrade does not cover the costs involved.
- Honey production takes place in areas with limited accessibility, and the risks of non-compliance are high, including the need to generate a structure for compliance.

Proposals:

That this be a proposal for good practice, but not a requirement in the standard.

That SPOs not be required to implement additional systems, but instead use the system, formats and information already available in organic certification.

2.2. Additional guidance in requirements 3.1.1 (clarifying how to use the list of members to inform and explain the standard to members), 3.1.2 (addition of a farm assessment tool as best practice), and 4.2.2 (connection of the requirement with the IMS).

Joint meeting: recommendation is to eliminate from requirement 3.1.2 the part of guidance referring to a best practice using farm assessments, leaving it as it is now.

Partially agree (137), strongly agree (117), disagree (53), not relevant (5). Total responses: 312.

Explanations for disagreement and partial agreement:

- The information is important, but obtaining this data may be a major challenge in regions with agrarian conflicts.
- A significant investment will be required to train field personnel for obtaining and assessing information. Not all SPOs can conduct such a detailed farm assessment.
- There is a lack of coherence between the criterion and the guidance.
- Complying with this requirement in Year 1 is not viable. More time and more resources for obtaining the information suggested would increase organizations' costs.
- A guidance is a suggestion, not a requirement in an audit.

- To address this is to attempt to establish the best baseline possible.
- Each organization will evaluate and prioritize the data to be obtained on the basis of its needs and its particular situation.
- Disagreement with this proposal becoming part of criteria.
- High costs and excessive demand for organizations.

Proposals:

A proposal to eliminate the guidance referring to the criteria because it does not contribute to compliance with the chapter on production.

Criterion 3.1.2 should be placed in Year 3 as a Development criterion.

Organizations should define the minimum elements.

2.3. Extension of requirement 3.1.5 (IMS) to first grade organizations with more than 100 members. Shift from ICS to IMS and from Dev/Year 3 to Core/Year 0.

Partially agree (141), strongly agree (115), disagree (52) and not relevant (2).

Explanations for partial agreement and disagreement:

- In addition to the costs represented, some fundamental concerns are expressed around creating indicators, and monitoring and evaluating the information required in an IMS: 1. Resistance to change will be one of the initial obstacles. A management system is continuous improvement, and leads to the standardization of processes. It is necessary to first increase awareness around the benefits this would bring for producers. It is necessary to respond to the market, to quality standards. This topic is very important, but it is a challenge that will require time. The disagreement here is NOT with improving the management of information, but this should not place producers in a “straightjacket.” 2. The costs of implementing an internal control system (ICS) are very high, beginning with establishing exact geolocations. While data is managed in an ICS, because of organic certification, there are still challenges in providing producers with simple, accessible tools.
- For SPOs that have thousands of members, compliance is very complicated and requires a significant investment of human and financial resources.
- It appears this change is currently not relevant, since an internal control system is already in place. There are no resources for its application.
- There is disagreement with FLOcert being the one to define the necessary elements in an IMS.

Proposals:

Having a mechanism (not system) for appropriate control is proposed before implementing an IMS. It does not need to be sophisticated, and should be designed to “fit” the organization.

That this criterion not be at Year 0, but rather at Development / Year 3.

An IMS is a monitoring tool for an SPO that assists in achieving the best management possible. Going back to the concept of simplifying standards, it is proposed that if an SPO already has an IMS, that Fairtrade criteria be integrated into that system.

That FLOCert acknowledges the IMS of an SPO as a tool for compliance by producers with the organization, and that if it is discovered that a producer is not complying with the IMS, that non-compliance with the IMS be established and that “sanctions” be applied to the producer, not to the overall SPO.

Eliminate the reference to the number of member producers corresponding to an IMS. That this criteria be applied to all SPOs.

That it be applied to all organizations, including those with fewer than 100 members.

Continue as a criteria for Year 3/ Development.

That making FLO-CERT the one that defines the elements of an IMS not be permitted.

There should be training in the IMS.

Topic 3: Environmental development

Joint meeting: In general, it is recommended that environmental requirements be reduced to a minimum and that solutions encompassing the entire chain be sought, in order to distribute the burden of paying the costs of compliance with environmental standards. It is also important to recognize the efforts that SPOs are already making with regard to the environment, and in order to obtain organic certification.

a. Climate change adaptation

3.1. Introduce a new requirement on the identification of climate change as a risk.

Strongly agree (131); partially agree (98), disagree (81), and not relevant (5). Total responses: 315.

Explanations for partial agreement and disagreement:

- There is awareness of the importance of identifying the risks caused by climate change. It is recognized that there is a need to improve in this area. Nevertheless, this cannot be achieved immediately.
- Capitalist economics transfers environmental costs to poor countries. This is an upside-down view of the world with those who have less and who contaminate less being required to do more to redress the damage.
- Developed countries do not want to take actions to improve the environment. Our peoples, in contrast, are working to take actions to preserve seeds, food, soil and water. There is a contradiction here.
- In reality, what is involved here is having professionals who can provide technical assistance and the available economic resources.
- Acceptance of this criteria signifies that the weakest link in the commercial chain—producers—will be responsible for the solutions. And what about the other stakeholders in the chain? Local, national and international entities? Traders?
- What we do not agree with is that measurement is based on a technical level that is beyond our capacities.
- Climate change problems should not be addressed in standards, because mitigation requires intervention by various actors

Proposals:

That a commitment be made by all the parties involved in the Fair Trade system, with producers and consumers taking actions that correspond to addressing this issue. Native peoples and communities have historically conserved the forest and other ecosystems where fair trade products are currently being harvested.

That this requirement correspond to Year 3 or 4, because a process is necessary to comply.

3.2. Introduce a new requirement on trainings on climate change adaptation practices.

Strongly agree (131), partially agree (96), disagree (87), not relevant (1). Total responses: 315.

Explanations for partial agreement and disagreement:

- SPOs do not have the resources to carry out these training processes.

Proposals:

That the guidance be eliminated, and only the requirement remain.

Review the time schedule for the three requirements. There is little time between one and the next.

Establish a baseline and develop a previously defined and assessed education program.

3.3. Introduce a new requirement on the implementation of climate change adaptation activities.

Strongly agree (173), disagree (109), and partially agree (33). Total responses: 315.

Explanations for disagreement and partial agreement:

- Organizations cannot guarantee that their members will implement actions. They can encourage and motivate the adoption of new practices leading to environmental protection.
- Producers lack the resources to comply with this requirement.
- There is concern about the way in which FLOCert will evaluate all of these requirements.
- Addressing climate change issues requires a range of stakeholders, not just SPOs.

Proposals:

That each organization determine the most appropriate way to achieve compliance.

That this be considered part of Development/Year 6.

It is proposed that implementation of climate change actions take place in accordance with the financial situation for SPOs.

b. Natural resource use

3.4. Changing the requirements on identification of land at risk of soil erosion and listing of sources of water, from Development to Core.

Strongly agree (188), disagree (66), partially agree (61), and not relevant (9). Total responses: 324.

Explanations for partial agreement and disagreement:

- By changing from Development to Core, this makes it more demanding. Environmental issues are a necessity, and a demand from the market, but there is still a great deal of difficulty in achieving implementation with producers. We are still in the process of considering up to what point we can implement them.

Proposals:

That this remain at Development/Year 3.

3.5. Addition of water quality assessment as a topic for trainings.

Disagree (143), strongly agree (119), partially agree (34), and not relevant (18). Total responses: 314.

Explanations for disagreement and partial agreement:

- There are a number of complications involved in reaching the point where producers would be able to assess water quality. Not even governments, at the municipal, state or federal level, are able to resolve even water supply, and it is even less possible to do so with water quality. This is beyond our reach.
- Water quality assessment should not be included within the criteria.
- In order to conduct analysis of water quality, it is necessary to conduct physical, chemical and microbiological analysis, which is very challenging and costly.

Proposal:

That assessment of the quality of water to be used for irrigation or processing not be included in the requirements.

3.6. Introducing a new requirement on efficiency of water management practices.

Strongly agree (124), disagree (118), partially agree (40), and not relevant (33). Total responses: 315.

Explanations for disagreement and partial agreement:

- But if this new requirement is approved, it will be necessary to require a report from the buyer along the same lines: How many liters of water are you using for processing? What are you doing to mitigate climate change? Responsibility for this should be shared.
- Complying with this requirement will require large amounts of human and financial resources.

Proposals:

That this be for Year 3 / Development, and that it be applied to each SPO, but not to all of its members.

Place this at Year 6, Development, since there are numerous items requiring compliance.

That each organization determine the most efficient manner to manage groundwater resources.

3.7 Introducing a new reactive requirement on land and water use and land tenure. This requirement would not be proactively checked but would enable Fairtrade to act in case there are indications of conflict.

Disagree (146), strongly agree (110), not relevant (36), and partially agree (23). Total responses: 315.

Explanations for disagreement and partial agreement:

- “No indications [of conflict]” is a difficult requirement to meet in territories where there are environmental, agrarian and land use conflicts. This is a very complex topic, involving laws, which in some cases would not apply,

for example, in communal land, in *ejidal* land, in municipalities. There would be many limitations to complying with this requirement.

- These topics are only resolved in a country's legal arena. The standard should not meddle in this matter.
- This criterion would force us into a process that, as organizations, we are unable to carry out.
- The tangible intervention by Fairtrade International in the case of a conflict is not clearly explained.
- The policies in every country and the internal regulations in every organization specify that, in the case of disputes or conflicts, members will resolve them through the corresponding legal entities.

Proposals:

That this requirement be eliminated. This topic does not fall within the scope of SPOs or that of the standard.

c. Approach to environmental requirements

3.8. Change in the following requirements, 3.2.6, 3.2.10, 3.2.11 and 3.2.14, [as specified] from Development to Core, and applicability from Year 3 to Year 1, and a new requirement on centralized purchasing.

Strongly agree (121), disagree (105), partially agree (46), and not relevant (43). Total responses: 315.

Explanations for disagreement and partial agreement:

- Cannot make centralized purchasing mandatory.
- The decision is very complex, since it brings together numerous topics in a single decision, particularly the topic of centralized purchasing.
- Centralizing the purchasing of pesticides and chemical substances is not an effective measure for controlling the use of prohibited agrochemicals. This was attempted in the past, and it did not work.
- Centralizing purchasing requires having the necessary and corresponding administrative, economic and financial capacity, and having some specific abilities, generating an enormous responsibility for SPOs.
- A lack of correspondence is apparent between guidance and the new requirement. Each proposes something different.

Proposals:

That it continue as Development / Year 3.

That the new requirement on centralized purchasing of pesticides and chemical substances not be included.

3.9. Introduce a requirement to prevent deforestation activities.

Strongly agree (166), disagree (85), partially agree (58), and not relevant (6). Total responses: 315.

Explanations for disagreement and partial agreement:

- The organizations consulted are not familiar with the HCS methodology, nor with the implications or difficulties in application.
- This is a criterion that is very complex, costly and difficult to implement.
-

Proposals:

That the criterion be written as follows: ...The organization provides training and supervises members to ensure that they do not carry out activities that generate deforestation and that they do not destroy vegetation in protected areas.

Regarding carbon stock, it is proposed that the commitment be only for training.

That this requirement be at Development/Year 3.

That this requirement be at Development/Year 6.

Topic 4: Gender equality and women's empowerment

4.1. Introduce a new development requirement for Year 3, on SPOs having a gender policy.

A wide majority (227) strongly agree that a requirement for a gender policy be included. Some partially agree (57) and disagree (30). Total responses: 314.

Explanations for partial agreement and disagreement:

- Supporting women is very important. However, making it a policy is a violation of democracy. We work on this as an initiative, not as a policy. It makes it something imposed. Participation is voluntary.
- This should be a process from the inside to the outside. Not recognition due to external pressure.
- Policy should be developed in accordance with our capabilities and in a participative manner within each SPO.

Proposals:

That the terms of measurement for this policy be specified.

That awareness-raising and training occur first to then be able to understand the topic.

There can be a requirement for training and for having a list of participants, photos, etc. (means of verification).

In Costa Rica and Panama, as agreed by the Assembly, the National Network will develop internal policies and share them with SPOs. Each organization will accommodate the policy in line with its reality and will implement the policy.

Indicators should not be imposed.

Topic 5: Development potential

5.1. Adding a self-assessment tool before applying to Fairtrade, for organizations to have a better understanding of what Fairtrade requires.

A wide majority strongly agree (265), some partially agree (46), and for others, it is not relevant (3). Total responses: 314.

Explanations for partial agreement:

- It is important to establish whether one wants to become certified or not, and to protect those that are certified. The process to enter the system should be more demanding.

- The tool on its own is not enough. The SPO applicant, on its own, may not know how to use the tool and may self-assess externally. External assistance is necessary. It is recommended that qualified personnel, such as CLAC's operations team, provide follow-up.

5.2. Introduction of a requirement that during the application process an organization wishing to join Fairtrade demonstrate that: it has a potential market for its product, and it was established and has been operational for at least two years.

A great majority strongly agree (242), some partially agree (65) and only 6 disagree. Total responses: 313.

Explanations for partial agreement and disagreement:

- There should be a filter for those joining.
- When an organization is just being established, this type of assistance is important, entering into the system, it would be discriminatory.
- The minimum prior to accessing Fairtrade should be 3 years.
- Disagree: it limits freedom to take actions and independence in the certification decision.
-

Do you have any other suggestion on indicators that could be included and that organizations should comply with during the registration process (that is, prior to joining Fairtrade)? Yes: 116. No: 90.

Consider the organization's reputation, and the market potential for its products.

That the National Fair Trade Network in each country also be included, as a preceding filter.

Benefit from advice from CLAC's National Networks and operations team.

Nor does a letter of intention represent certainty; it should be a contract or a more serious document.

That new organizations do not affect contracts already in effect. That they demonstrate having verifiable commercial activity, financial statements that are solid and transparent and can be monitored, partnership activities and a clearly democratic structure.

Include an indicator that establishes that none of the leaders of the new SPO is a trading official.

Local Fairtrade organizations should be previously consulted with.

5.3. A new core requirement for organizations to involve all members in the decision to join Fairtrade.

Strongly agree (288), partially agree (23), and only 2 organizations disagree. Total responses: 313.

Explanations for partial agreement and disagreement:

- There should be a clear explanation of what "collective" means; this concept is ambiguous.
- This requirement does not guarantee knowledge of the system and its implications.

Proposals:

Improve the wording. It should say: Guarantee that the decision to join Fairtrade was a decision reached democratically by the General Assembly.

The requirement should focus on prior training.

Topic 6: SPO Governance

6.1 Additional guidelines separating the role of Board members from that of management.

The great majority strongly agree (279), some partially agree (22), some disagree (8), and for others, it is not relevant (5). Total responses: 314.

Explanations for partial agreement and disagreement:

- Disagree, considering that the by-laws and internal regulations for each SPO already has this defined and it adheres to the national legislation in each country.

Proposals:

The separation of functions between the Board of Directors and the operations team should be a requirement and not a point of guidance.

6.2 A more explicit definition of the frequency of updates and the information to be kept a link to an IMS, and not allowing double membership.

Strongly agree (169), partially agree (104), disagree (35), and not relevant (4). Total responses: 312.

Explanations for partial agreement and disagreement:

- Prohibition of double membership should extend to the organization's members and members of their families in the same area or micro-region (for example: a wife who has a production area in the same municipality and who belongs to another Fairtrade cooperative).
- This situation may occur in cooperatives because people are free, as citizens, to join an organization.
- If this criterion is approved, many associations will disappear.
- It is not so easy for SPOs to detect double membership.
- Double membership does not represent problems for a cooperative. The Law on Cooperatives allows it.

Proposals:

Regarding double membership, this should be a separate requirement.

SPOs should put some terms of responsibility in writing, so that new members can sign it when they join, verifying that they do not belong to another SPO producing the same products.

This should be analyzed from a legal perspective (freedom of association).

6.3 Additional guidance on defining Board term limits.

A great majority strongly agree (208), some disagree (62), some partially agree (39) and for others, it is not relevant (4). Total responses: 313.

Proposals:

The requirement should clarify that in countries where there is legislation regulating this matter, the SPO should comply with this legislation. In countries where there is no national regulation on this matter, the time period for which they are elected should be regulated by the Assembly in a democratic manner, guaranteeing that it will not be for an indefinite period of time.

Eliminate the following from the guidance: “Best practice is a Board term limit of 9 years (3 x 3-year terms, and re-election for 2 additional terms).”

6.4 Limitation on non-members in the Board to reduce external actors’ (e.g. traders) influence over organizations.

A great majority strongly agree (295), some disagree (16), and some partially agree (2). Total responses: 313.

Proposal:

It should read: PREVENTION OF or PROHIBITION OF, instead of LIMITATION ON.

6.5 Changing requirement 4.2.13 (on sharing audit results with members) from Development to Core.

A great majority strongly agree (290), some partially agree (19), and some disagree (2). Total responses: 311.

Proposals:

- Better to keep it at Development.
- The mechanisms for sharing audit results should be clarified.

6.6 New requirement on having a surveillance committee to oversee the overall administration of the organization (including the use of Premium) on behalf of the members in order to enhance members’ control over the organization.

A great majority strongly agree (247), some disagree (33), some partially agree (29), and for some it is not relevant (4). Total responses: 313.

Proposals:

Replace the term “committee” with “entity.” There is a committee, in accordance with by-laws and national legislation. A council is not required by law, and it can even be one person who is responsible, because there are cases in which it is a problem to have a council because it should have various members and a small organization may not have enough participants.

It is suggested that the guidance be adapted to a section on good practices.

In Brazil, the term “Surveillance Committee” may be interpreted different ways by auditors. It would be better to use the term “Fiscal Council” (*Consejo Fiscal*), which already exists in the legislation.

Do you have any additional comments on the surveillance committee? Yes.

Members of the surveillance committee should minimally have basic knowledge of accounting and administration. It is suggested that a requirement for training be added.

Topic 7: Fairtrade Development Plan and Premium use

7.1 On Fairtrade Development Plan and Premium use planning (recommendation to create a committee, as a best practice, but not a requirement).

Joint meeting: SPOs already have legal structures for addressing the use of the premium. The Board of Directors has been mandated by the General Assembly in this regard. If a committee is established outside the by-laws, this may generate even more internal conflicts. The Board of Directors and Surveillance Committee have obligations clearly established in the by-laws, and the assembly can remove members from these two entities if they fail to fulfill their responsibilities. Another committee is not necessary.

Strongly agree (139), partially agree (83), disagree (82), and not relevant (4). Total responses: 308.

Explanations for partial agreement and disagreement:

- The general assembly, surveillance committee and Board of Directors are already carrying out the determination, planning, implementation and documentation of Premium use. Creating another committee is not necessary nor is it viable.
- Creating additional committees generates more costs and more bureaucracy in the organization.
- This is very much imposed from the outside, assisting in decision-making in accordance with the standard. This is a decision to be made by the SPO after assessing where investment is necessary.

Proposals:

Eliminate the reference to creating a Committee in the guidance, because mechanisms for governance already exist.

Specify in the guidance that the suggestion to create a committee is only for organizations with more than 500 members.

7.2 Requirement on needs identification proposed to be changed from Development / Year 6 to Core / Year 1.

A wide majority strongly agree (237), some partially agree (68), some disagree (5), and it is not relevant for 1. Total responses: 311.

Explanations for partial agreement and disagreement:

- One year is very little time to fulfill this requirement.

Proposals:

That it not be Year 1, because this is very little time. That it be Development / Year 3. SPOs require external advice for prioritizing actions to be taken.

7.3 New requirement on Premium reporting on an annual basis.

A wide majority strongly agree (230), some partially agree (41), and some disagree (40). Total responses: 311.

Explanations for partial agreement and disagreement:

- This is a task for FLOCert, in the audits.

- FLOCert charges fees for conducting audits and gathers information. Are FLOCert, Fairtrade and CLAC not part of the same system?
- Who is going to assess the impacts?

Proposals:

Create a communication mechanism to enable organizations to demonstrate their impact.

That the time period be defined as 3 months instead of 1 month.

Share information with the Latin American Network to lend more weight and support to the Producers' Network.

7.4 New requirement to sanction mismanagement of Fairtrade Premium.

A wide majority strongly agree (209), some partially agree (61), and some disagree (41). Total responses: 311.

Explanations for partial agreement and disagreement:

- Agree with the system's transparency, responsibility and appropriate management, but the way in which confidentiality of information is treated is important.
- Producers' organizations do not have access to reports from the rest of the chain.
- This criteria should be for Year 1, since there are no premiums in Year 0.

Proposals:

There should be a body for disseminating information.

The requirement should read: "You and members of your organization administer Premium funds in a transparent, responsible, and democratic way and with appropriate management." The rest of the requirement is offensive. The guidance may generate misinterpretations. This requirement should be removed.

That this criteria be one of the more major ones.

Topic 8: Workers in SPOs

8.1 A new requirement on compliance with national legislation that is checked reactively as a means to act in case there are known violations.

In the consultation this item did not have an indicator of evaluation in 8.1, but rather in 9.1.

8.2 Reduce the significant number of workers from 20 workers to 10 permanent workers or equivalent worker days (days worked multiplied by the number of workers working 40 hours/week all year round).

Joint meeting: The recommendation is to conduct a more profound analysis before making this change in the standard. How much control can an SPO exert over the hiring of workers of its members? The number of workers depends on the crop.

Disagree (150), strongly agree (89), partially relevant (69), and not relevant (5). Total responses: 313. The votes were very much divided.

Explanations for disagreement and partial agreement:

- Agree with reducing the number of workers, but not with the wording of the criterion.
- Need a more profound review. The criterion should be reconsidered by country and by product.

- More clarity is needed regarding the scope of this criterion. Does it apply only to the Cooperative and/or also to its members?
- It is better for national legislation in each country to be applied in the case of compliance with requirements for SPO workers.

Proposals:

Eliminate the requirement of equivalence in days worked.

There should be a transition period, due to the risk of non-compliance.

It should continue as it is at 20.

Improve the writing to be more specific and to include members.

8.3 Changes on contracts for permanent workers:

- **Change the requirement on written contracts for permanent workers (applicable only if the organization or members employ a significant number of workers) from Development / Year 3 to Core / Year 1.**
- **Change the requirement that requires that copies of contracts are given to permanent workers from Development / Year 3 to Core / Year 1. The requirement is applicable only if the organization or members employ a significant number of workers.**

A wide majority strongly agree (234), some partially agree (43), disagree (31), and for others it is not relevant (4). Total responses: 312.

Explanations for partial agreement and disagreement:

- The wording should consider the actual situation for each product and each country.
- It is very demanding to change from Year 3 / Development to Year 1 / Core.

8.4 New requirement to ensure that field workers have access to clean drinking water. This requirement would be applicable to all producers regardless of the significant number of workers.

Joint meeting: It is recommended that the following be maintained in the standard: that auditing will be focused exclusively on members that in fact have a significant number of workers. Clarification that if “drinking water” remains in the standard, it will be difficult to guarantee compliance by SPOs with this criterion. It should read: “water suitable for human consumption.”

Strongly agree (145), disagree (121), and partially agree (46). Total responses: 312.

Explanations for disagreement and partial agreement:

- Access to water is a right that the State should guarantee. SPOs should pressure for compliance on this by the government. SPOs cannot meet this requirement if their members are not guaranteed this right.
- It is difficult to transport drinking water to some farms that are located in remote areas, and it will be important to allow more time on this.
- If this is implemented, it should specify that water quality will be the same as the quality of water consumed by farm owners.

Proposals:

The new requirement for compliance should specify safety indicators.

It should have parameters, frequency of analysis, and this criterion should not be requested in Year 0 / Core.

It is suggested that this should be classified as a development criterion since the costs involved are very high.

The wording should be as follows: “You and the members of your organization ensure that all field workers have access to water suitable for human consumption in its various modalities,” because if “drinking water” is left in the criterion, it is limited exclusively to this stipulation, and realities vary greatly in communities. For example: communities use varying forms of improving water quality, such as water filters, and when water has been chlorinated, families receive clear indications from the health ministry for determined uses.

Topic 9: National legislation

9.1. A new core requirement on compliance with national law.

Joint meeting: Every country has its own control mechanisms. This is not Flocert’s task as certifier. For any certifier, it would be complicated to comprehensively address so many laws to be applied in an audit. Furthermore, in many countries not even the government complies with its own legislation.

Strongly agree (162), partially agree (104), disagree (46). Total responses: 312.

Explanations for partial agreement and disagreement:

- It is not possible to violate legislation in countries like Mexico, for example, because even the government is in violation. As Fair Trade organizations, we should provide dignified work with rights to our workers. However, the extent to which we can go beyond this on our own, without government assistance, will be limited.
- The limitation for complying is a matter of time. Training should be provided on this topic.
- The question is: how will this criterion be measured? An audit may indicate non-compliance—resulting from a lack of knowledge of national legislation.

Proposals:

- Remove the following from the requirement: “there are no indications that you violate any of them,” and that “you” refers to the organization and not its members.
- It is recommended that when an auditor visits an organization, that he/she has extensive knowledge of legislation, particularly the labor code and environmental laws.

Topic 10: Fostering continuous improvement

10.1. To show separately the core requirements from the development requirements so the options the standards offer are clearer to producers. Also, to redraft development requirements highlighting the intended outcome and leaving the decision to the organization on how to reach this outcome.

The majority strongly agree (253), some partially agree (31) and some disagree (28). Total responses: 312.

Explanations for partial agreement and disagreement:

- This is a very nice criterion, but difficult to apply. Soil fertility may be demonstrated in improvements in the organic layer and microorganisms. There is soil that is not worth anything without fertilizers, and the costs involved economically affect the organization. Conducting soil studies is also expensive.

Proposals:

Improve the wording of the criterion, establishing that “you have a plan for improving soil fertility for your members.”

There should be a baseline for defining improvement in soil fertility. For this reason, the requirement should not be approved as it is currently formulated.

Update knowledge through trainings.

10.2. Introducing a new requirement for organizations that have been in the system for more than 6 years to foster continuous improvement. Your overall certification score on certification requirements increases over time.

Joint meeting: There are different moments in the life of an organization. There will be high points and low points, and increasing certification scores should not become a “straightjacket” for organizations. It is not always possible to maintain steady growth. Some situations that organizations must confront make it difficult to maintain linear growth. The assessment of continuous improvement is a task for the MEL more than for the standard.

Votes were significantly divided. Strongly agree (132), disagree (99) and partially agree (81), for a total of 312 responses.

Explanations for disagreement and partial agreement:

- It would be an immense challenge to comply with this requirement. This is a very sensitive matter. Organizations confront changes in external variables that are beyond their control but that affect their performance, in terms of both organization and production. Organizations can ensure compliance with requirements year to year, but not necessarily improvement.
- Organizations would not make great efforts to increase their scores, due to concern that they would not be able to maintain those scores and increase them over time.
- Assessing with scores is not the way. It does not measure the real advances made by an organization. Audits are often subjective, and sometimes, results depend on an auditor’s particular criteria.
- The fact that an organization remains in the system indicates continuous improvement.
- With low prices and low sales, Fairtrade is difficult to comply with.
- There is concern regarding FLOCert’s interpretation with regard to this assessment.

Proposals:

An improvement (increase) in sales and income could be taken into consideration.

Topic 11: Role of traders

11.1 Add a new requirement in the Trader Standard on transparency should the trader provide services.

Results very close to consensus: strongly agree (235), partially agree (32) and disagree (41). Total responses: 308.

Explanations for partial agreement and disagreement:

- This implies payments for services that should be free and transparent. And furthermore, that support the improvement of the entire system.
- The intention here is an interesting one, but this practice should not exist.

- There are small groups that know very little about the system, and it is important to provide them with training. Nor do auditors know about this.
- The creation of organizations by large cooperatives and/or traders should not occur.
- Many traders offer advance payments and trainings, and one supposes they are free. But later, they charge for this in coffee sales. This is why the role of traders and the economic implications for producers must be very clear.
- Transparency is necessary not only in services, but also in transactions.

Proposals:

Information should be tripartite (tripartite contracts between an importer, an exporter and an SPO).

The wording of the requirement should be more complete.

That the services that traders provide to organizations not be charged for, and rather, free.

Topic 12: Trading with integrity

12.1. New requirement to prevent bad faith practices.

The option receiving the most votes was strongly agree (154), followed by partially agree (98), disagree (45), and not relevant (15). Total responses: 312.

Explanations for partial agreement and disagreement:

- Define what the indicator is.
- The wording lacks clarity. It is not even clear how a determination will be made. It could lead to a subjective evaluation by an auditor.

Proposals:

The wording of the criterion should be clearer and more specific in order to prevent diverse interpretations.

Develop a guide with examples.

12.2. New Core / Year 0 requirement on honoring contracts.

The majority strongly agree (219), some partially agree (72), and some disagree (21). Total responses: 312.

Explanations for partial agreement and disagreement:

- During the discussion, many cases of traders not complying with Fairtrade terms were presented. This could affect the audits of producers, even though the latter are not responsible for such non-compliance.

Proposals:

Document circumstances that hinder compliance with contracts when they occur.

Determine if arbitration is indicated.

That this be enforced throughout the entire chain.

It is proposed that this requirement be included in the tripartite contract or the contract signed by the final buyer with an SPO.

Fairtrade could suggest models/forms of contracts to guide SPOs in their commercial dealings with buyers.

Compliance should be focused on the buyer.

Propose, as one of the parties in contracts, to establish minimum and maximum volume levels.

Topic 13: General comments/feedback from stakeholders

- ✓ After the new standard for SPOs has been reviewed and approved, the score or ranges on the checklist should be presented and interpreted with producers and auditors, to ensure that all of us interpret them in the same way.
- ✓ Regarding “3.1 Introduce a new requirement on identification of climate change as a risk,” the risks in production could be identified and registered in ICS internal control records.
- ✓ In 3.3, include the terms “mitigation” and “resilience.”
- ✓ Regarding 11.1, FT sales contracts are still received in English, and therefore the obligation to prepare contracts in the producer’s language should be included in criteria for traders.
- ✓ Once again look at the need to simplify the language used in criteria.
- ✓ Regarding the South-South market: Support for developing local markets and facilities in the trial phase of licenses for use of the FT logo.
- ✓ Regarding unfair competition: Bring visibility to the difference between products from SPOs and from contract-work companies.
- ✓ Request to implement mechanisms for verifying unfair competition in specific products such as wine grapes (SPOs versus contract work) and honey (SPOs versus local traders).
- ✓ Regarding Chapter 3 and biodiversity: It is suggested that a Development / Year 6 requirement be added in which actions for increasing biodiversity and protection of native plants will be demonstrated.
- ✓ Orange list: There are major difficulties in relation to the costs of replacing agrochemicals such as glyphosate and mancozeb in grape production. Particularly in the case of glyphosate, it is not taken into consideration that this agrochemical is applied manually (from a backpack) or with machines that spray weeds found. It is not applied from airplanes as the case with soybeans.
- ✓ It is very positive that during the discussions the manner in which requirements will be measured in audits was included.
- ✓ There are requirements that should be more specific, since it is not clear how auditors will measure them.
- ✓ There are more requirements, but we are increasingly selling less Fairtrade.