

THE CONSUMER GOODS FORUM

Sustainable Supply Chain Initiative | Primary Production Criteria - Environmental | Comments Received from Stakeholders/Public Consultation | May-June, 2023

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● Introduction

The Sustainable Supply Chain Initiative recently conducted stakeholder consultation involving representatives from diverse sectors, including scheme owners, international and industry experts, associations, NGOs, and academics. This consultation specifically focused on the draft Environmental Benchmark Criteria for Primary Production scope.

This document serves as a compilation of all the valuable input received during the public consultation phase that took place in May and June 2023.

The feedback and comments received during this consultation were thoroughly reviewed and discussed within the SSCI Environmental Working Group (members listed below). Additionally, an external consultant was engaged to provide their expertise in this process. The outcomes of these discussions are documented in this report, which is accessible for your reference.

The report is organised into themed chapters, each containing specific criteria. The comments received have been categorised and consolidated under their respective associated specific criterion, including the original text, the comment received, the SSCI response and the final text.

For further details on the consultation process, please visit the dedicated page [SSCI Public Consultation](#).

If you have any questions or require additional information, please do not hesitate to reach out to the CGF SSCI Team at ssci@theconsumergoodsforum.com.

SSCI Environmental Working Group Members

Tamara Muruetagoiena, Chair	International Fresh Produce Association
Rita Bielinski	Land O'Lakes
Jessica Meisinger	MSD Animal Health
Janis McIntosh	Naturipe Farms

Public Consultation

Stakeholders invited to the consultation

German Agency for International Cooperation (GIZ)	Government Agency
German Institute for Standardization (DIN)	NGO
Global Sustainable Seafood Initiative (GSSI)	NGO
International Social and Environmental Accreditation and Labelling Alliance (ISEAL)	NGO
International Trade Center (ITC)	NGO
National Organic Program (NOP USA)	Government Agency
Organisation for Economic Co-operation	

and Development (OECD)	NGO
The Sustainable Trade Initiative (IDH)	NGO
UN Environment	NGO
UN Forum on Sustainability Standards (UNFSS)	NGO
United States Environmental Protection Agency (EPA)	Government Agency
World Wildlife Fund (WWF)	NGO

Third-party Audit, Certification Standards & Certification Bodies invited to the consultation

Control Union
Ecocert Group
Fair Trade International
Fair Trade USA
Forest Stewardship Council (FSC)
Global G.A.P
Programme for the Endorsement of Forest Certification (PEFC)
Rainforest Alliance
Roundtable on Sustainable Palm Oil (RSPO)

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Scientific Certification Systems Global (SCS Global)

Sustainable Food Group (IPM Institute)

Sustainable Forestry Initiative (SFI)

Sustainable Rice Platform

The European Feed Manufacturers' Federation (FEFAC)

Stakeholders who answered the consultation

ECO Canada

GlobalG.A.P

Japan Food Safety Management Association (JFSM)

Jeronimo Martins

Programme for the Endorsement of Forest Certification (PEFC)

Sustainable Food Group

Sustainable Forestry Initiative (SFI)

● Chapter 1: Environmental Management Systems

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
The standard shall require that the most senior management demonstrates its commitment to environmental sustainability.	<ol style="list-style-type: none"> 1. Why not simply require "Policy"? Much more easier to benchmark standards when the requirements are very specific and explicit . This requirement may specify policy and commitment to provide resources. 2. It should not only be "most senior management", but the organisation as such that should demonstrate commitment. The commitment should encompass all aspects that the standard covers, not only environmental sustainability. Suggestion: "The standard shall require that the organisation demonstrates its commitment to comply with and continuously improve its implementation of standard requirements." 3. Having senior management demonstrate their commitment to environmental sustainability is appropriate. Recommend also that the standard shall require that the organisation demonstrates its commitment to continuous improvement regarding its implementation of standard requirements. 	<ol style="list-style-type: none"> 1. Management commitment can be demonstrated by different means in addition to a written policy. 2. This criterion is specific for top management commitment. 3. Continuous improvement is covered by 1.12 	1.1 The standard shall require that top management demonstrates its commitment to environmental sustainability.
The standard shall require that the environmental commitments are communicated as appropriate.	<ol style="list-style-type: none"> 1. Suggest clarifying "as appropriate" as much as possible. Does it mean Internally? Externally? To all employees involved in helping ensure commitments are met? 2. The standard shall require that environmental commitments by senior management are communicated as appropriate. 3. Split this into internal and external communication 	<ol style="list-style-type: none"> 1. Clarified that they need to be publicly available 2. The criteria refers to the organisational commitments mentioned in 1.1 3. Requirement has been split in two criteria, 1.2 and 1.3 	1.2 The standard shall require that the organisation's environmental commitments, including goals and objectives, are publicly available.

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	<p>4. Such a commitment should be made publicly available. Suggestion: "The standard shall require that the commitments are publicly available."</p> <p>5. Recommend that the standard requires that the commitments are publicly available.</p>	4 and 5: Rephrased accordingly.	
New criterion	N/A	Created in response to feedback from 1.2.	1.3 The standard shall require that the organisation's environmental commitments are communicated internally as appropriate.
The standard shall require that clear responsibility is assigned for the implementation of the standard requirements.	<p>1. "The standard should assign overall responsibility for implementation of requirements to senior management."</p> <p>2. The standard should also have requirements for training and education of the organisation's staff and contractors appropriate for their roles and responsibilities."</p>	Reference to senior management added as suggested. Training is covered in 1.5.	1.4 The standard shall require that the responsibility for the implementation of the standard requirements is assigned to top management.
The standard shall require that personnel in relevant business functions receive adequate training on the standard's requirements.	<p>1. Documented?</p> <p>2. The standard should have requirements for training and education of the organisation's staff and contractors appropriate for their roles and responsibilities.</p>	<p>1. Record keeping is required in 1.6</p> <p>2. 'Adequate' has been replaced with 'appropriate to their roles and responsibilities'. Competence of contractors included in 1.5.</p>	1.5 The standard shall require that personnel in relevant business functions receive training on the standard's requirements, appropriate for their roles and responsibilities.

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The standard shall require that outsourced and subcontracted activities comply with the principles and criteria of the standard, which are relevant to the services provided.	The standard should have requirements for training and education of the organisation's staff and contractors appropriate for their roles and responsibilities so that their practices comply with standard requirements.	Wording has been aligned with ISO 14001	1.6 The standard shall require that contractors under its control, doing work that affects its environmental performance and its ability to fulfil its compliance obligations, are competent on the basis of appropriate education, training or experience.
New criterion	N/A	Criterion added	1.7 If applicable, the standard shall require that suppliers of animal feed and crop substrates comply with the standard's requirements.
New criterion	N/A	Criterion added	1.8 The standard shall require that records on the amounts produced and their respective certification claim(s) are maintained and available to stakeholders for chain of custody and certification of finished products.
The standard shall require that records and documentation (e.g., measurements, training records...) are maintained and accessible for a defined period of time to demonstrate compliance	1. Record retention is appropriate and, in many jurisdictions, a legal requirement. 2. Recommend that retention timelines be in accordance with legal requirements in the jurisdiction(s) where the organisation operates.	Legal compliance is already required by 2.1 and the standard certification cycle might require a longer period of retention.	1.9 The standard shall require that records and documentation (e.g., measurements, training records...) are maintained and accessible for a defined period of time to demonstrate compliance with the standards' requirements.

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with the standards' requirements.			
The standard shall require that significant environmental aspects and impacts (negative and positive) are identified and that environmental risk assessments are performed as appropriate to detect and assess potential threats to the environment and that effective measures are taken to address the findings from the risk assessment.	<p>1. Recommend removing (or at least reframing with more open language so that it doesn't sound like something that needs to be contracted out). While we appreciate the desire for something like this, the risks of agricultural production are generally known and a risk assessment is likely to be a significant time/resource investment that doesn't result in a lot of new information or significant value. We recommend alternatively focusing on standard criteria that mitigate known risks, e.g., risks to surrounding habitat, environmentally sensitive areas, water (water bodies, groundwater, soil, native habitat areas like grasslands, woodlands, riparian areas, etc.) and risks to people, (e.g., farm worker housing, offices, neighbouring fields). Environmental risks can be mitigated without needing to perform a full risk assessment. 1.9 would additionally ensure that risks mitigation efforts are tracked and leading to the desired outcome, i.e., successful risk mitigation.</p> <p>2. Ask for "documented" requirements and maintenance of records for this criteria.</p> <p>3. This type of requirement is appropriate. Depending on the jurisdiction where the organisation is located, requirements such as these are typically addressed in regulation.</p>	<p>1. Rephrased so a risk assessment is not specifically required as a means to determine risk and opportunities.</p> <p>2. Maintenance of records is already covered in 1.9.</p>	1.10 The standard shall require that significant environmental aspects and impacts (negative and positive) are identified and that risks and opportunities related to its environmental aspects are determined.

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The standard shall require that, from the identified environmental aspects and impacts, a number of indicators are selected and a baseline is established to be able to monitor continual improvement. The results of monitoring are reviewed and appropriate action is planned and taken when necessary to ensure continual improvement.	<p>1. Too loaded, need to break into multiple requirements?</p> <p>2. The use of indicators and an established baseline is not suitable for all soft commodities and should therefore be removed (or the possibility of n/a) Also, it is important to reflect at which level the indicators should be set as there may be different conditions, such as highly productive soils and poor soils. At minimum, the requirement should be adjusted to read: "The standard shall require that monitoring and evaluation of key environmental aspects, including those identified through an appropriate impact assessment, is periodically performed and results fed back into the planning process for continual improvement. If appropriate, producers shall select indicators at the level of the management unit as a baseline for monitoring and improvement.</p> <p>3. Recommend that the requirement be revised to read: The standard shall require that monitoring and evaluation of key environmental aspects, including those identified through an appropriate impact assessment, is periodically performed and results of this monitoring and evaluation fed back into the planning process for continual improvement. Where appropriate, producers shall select indicators at the level of the management unit as a baseline for monitoring and evaluation. Also, it is important to consider at which level the indicators should be set as there may be different conditions, such as highly productive soils vs. poor soils; varying levels of forest health, etc.</p>	<p>1. Requirement has been split in two.</p> <p>2. Reference to baseline deleted. Rephrased to include improvement based on feedback.</p>	1.11 The standard shall require that a management plan is implemented including environmental goals, objectives and actions to achieve the objectives.

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New criterion		Created based on feedback from 1.11.	1.12 The standard shall require that the environmental performance of the organisation is monitored, the progress periodically reviewed and the results of this monitoring and evaluation fed back into the planning process to ensure continuous improvement.

● Chapter 2: Compliance, Transparency and Complaints

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
The standard shall require that all applicable national legal requirements are complied with.	<ol style="list-style-type: none"> 1. Include "other requirements" as well 2. Any standard should require legal compliance as one of its underlying principles. 	1. Reference is made now to compliance obligations based on ISO 14001 wording.	2.1 The standard shall require that the organisation fulfils its compliance obligations.
The standard shall require that, if applicable national legal requirements set a different level of adherence than set by the scheme, and the highest level of environmental protection is audited.	<ol style="list-style-type: none"> 1. Recommend consulting with Certification Bodies about the feasibility of this for auditors. This seems like a potentially unreasonable expectation that an auditor knows and understands all of the laws in all of the countries in which they perform audits. Also, standards should generally be written to go above and beyond the law, never less than the law. 2. Only applicable for requirements where emission limits or discharge standards are prescribed by a scheme (which is unusual for environmental schemes) 3. This is superfluous if the standard requires compliance with legal requirements. The certified entity will have to operate in compliance with both legal requirements and standard requirements, so it doesn't matter which one is higher. 	All: Criterion deleted.	N/A

<p>The standard shall require that the producer makes available adequate information on its environmental management system and environmental performance to relevant stakeholders.</p>	<p>1. Too wide. Usually the schemes ask for publically available policies or info on specific incidents and not for environmental performance as a whole.</p> <p>2. I propose to include this requirement in topic 1. Environmental Management Systems as I find criteria 1.2 too narrow in terms of scope and as I am can't understand how legal compliance procedures can give relevant inputs the communication of EMS and environmental performance to stakeholders (that's just one small part of it).</p> <p>3. Soft commodities such as forestry operate with forest management plans, not with environmental management systems. Also, it is difficult to define the term "relevant stakeholder" and therefore suggested to refer to "affected stakeholder" throughout the document. Suggestion: "The standard shall require that the producer makes available adequate information on its sustainable management practices, such as management plans or management systems, to affected stakeholders."</p> <p>4. Recommend that the requirement be edited to: 'The standard shall require that the producer makes available adequate information on its sustainable management practices, such as management plans or management systems, to affected stakeholders.' 'Relevant stakeholder' is a loosely defined term and can result in significant effort for little benefit."</p>	<p>All: Reference to making available information about the management system has been deleted.</p> <p>3&4. Relevant stakeholders has been replaced by stakeholders.</p>	<p>2.2 The standard shall require that the organisation makes adequate information on its sustainability performance available to stakeholders.</p>
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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
The standard shall require that a mechanism to address complaints or concerns is established. The grievance mechanism shall be accessible and understandable to all workers and external parties.	<p>1. The following 3 criteria— I propose to move the topic “Grievance Mechanisms” and be listed as the 3rd topic since it is very related with environmental management systems (e.g., as topic 2. Legislation and Transparency).</p> <p>2. "This requirement should be revised to clarify whether it is addressing:</p> <ol style="list-style-type: none"> 1. complaints about the standard, or 2. complaints that an employee may wish to bring against their employer. An effective Forest Management Standard should have a mechanism for processing complaints regarding the standard and its implementation (1.)." 	<p>1. Grievance mechanisms requirements have been moved to Chapter 2 as requested.</p> <p>2. It has been clarified that it refers to claims concerning the organisation's environmental performance or its compliance obligations.</p>	2.3 The standard shall require that a mechanism to address complaints or concerns, regarding the organisation's environmental performance or its compliance obligations, is established. The mechanism shall be accessible and understandable to all workers and external parties.
The standard shall require that the confidentiality of any complaint raised is provided, and information is revealed only as necessary to investigate and handle the complaint.	<p>1. An appropriate requirement. Typically addressed by legislation and regulation. US and Canadian federal legislation covers whistleblower protection.</p>	<p>Criterion incorporated to this section.</p>	2.4 The standard shall require that the confidentiality of any complaint raised is provided, and information is revealed only as necessary to investigate and handle the complaint.

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The standard shall require that no worker or external party that lodged a complaint in good faith is retaliated against.	1. An appropriate requirement. Typically addressed by legislation and regulation. US and Canadian federal legislation covers whistleblower protection.	Criterion incorporated to this section.	2.5 The standard shall require that no worker or external party that lodged a complaint in good faith is retaliated against.

● Chapter 3: Pollution Prevention

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The standard shall require that the potential sources of pollution are identified.	1. Part of aspect impact already (covered in 1.8)	1. This criterion has been deleted since the identification of potential sources of pollution is required for impact and risk identification (1.10).	N/A
The standard shall require that systems and processes are in place for pollution prevention and to minimise the risk of pollution incidents.	1. This is superfluous if the standard requires compliance with legal requirements. The certified entity will have to operate in compliance with both legal requirements and standard requirements, so it doesn't matter which one is higher. 2. "The requirement should be scoped to the forest management. Typically, pollution prevention and minimising risk of incidents are addressed with regulation.	All: Maintained since it might not be covered by legislation in all countries.	3.1 The standard shall require that systems and processes shall be implemented for pollution prevention and to minimise the risk of pollution incidents
New criterion	N/A	Added new requirement on drift and run-off pollutants.	3.2 The standard shall require that systems and processes shall be implemented to prevent the drift or run-off of pollutants to neighbouring areas.
The standard shall require systems and processes are in place to manage and remediate contamination of air, soil and/or groundwater and that any contamination is communicated to relevant stakeholders.	1. Replace "remediate"" or split the requirement in multiple clauses. Communicated to relevant stakeholders is very wide 2. I propose to reword this requirement to "The standard shall require systems and processes are in place to manage and remediate contamination of air, soil and/or surface and groundwater and that any contamination is communicated to relevant stakeholders." to improve its scope. 3. For soft commodities with limited sources of pollution such as forestry, "systems and processes" is not suitable . Replace with	1. Requirement for remediation has been deleted. 2. Reference to surface water has been added. 3. Reference to communicate as appropriate has been added.	3.3 The standard shall require that systems and processes are in place to contain and mitigate the contamination of air, soil and/or surface and groundwater.

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	<p>"...require that appropriate measures are in place...". Also, the communication of any such contamination is not relevant because it is not key to sustainable management. Suggest to reformulate to "...and that contamination is communicated to affected stakeholder as appropriate.</p> <p>4. For forest management operations contamination of soil and water should be included and this is typically addressed with regulation. Regarding contamination of air, this is primarily applicable to manufacturing facilities and not applicable to forest management activities.</p>		
New criterion	N/A	Created based on feedback from 3.3	3.4 The standard shall require that pollution incidents are communicated to affected stakeholders, as appropriate.
The standard shall require that an environmental emergency plan is in place, including roles and responsibilities, training requirements and response guidelines for the prevention and management of major environmental incidents, as needed according to the risks of the activities undertaken on-site. Major environmental incidents shall be investigated and communicated to the relevant stakeholders.	<p>1. Split into two requirements</p> <p>2. See previous comments. Pollution prevention measures to the extent outlined here are not suitable for soft commodities such as forestry given the nature of forest management. This should be n/a for forestry.</p> <p>3. "While a good practice, it may be difficult to require an environmental emergency plan as this could take many forms. Recommend that the requirement outline the key elements of what should be in the plan and that it is scoped to reflect forest management. Also, in some jurisdictions such a plan could be a regulatory requirement.</p> <p>4. Notification to the authorities needed?</p>	<p>1. Emergency response plan and incident investigation split in different criteria.</p> <p>2, 3 & 5. The requirement refers now to an overall emergency response plan (HS&E) and details key elements to be included.</p> <p>4. Communication of incident investigation results required to affected stakeholders.</p>	3.5 The standard shall require that an emergency response plan is in place, detailing roles and responsibilities, training requirements and response guidelines for the prevention and management of major incidents, including environmental incidents, as needed according to the risks of the activities undertaken on the production or processing sites.

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New criterion	N/A	Created based on feedback from 3.5	3.6 The standard shall require that major incidents shall be investigated and the results of the investigation communicated to the affected stakeholders.

● Chapter 4: Management of Potentially Hazardous Substances

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
The standard shall require that an inventory of hazardous substances used and stored is maintained and that only officially registered products are used. Where no official registration exists, the standard shall require that guidance is provided based on Material Safety Data Sheets in accordance with applicable national legal requirements.	<p>1. Refer to GHS and SDS (term MSDS has been replaced with SDS under GHS). Include training requirements e.g. Globally Harmonized System of Classification and Labelling of Chemicals (GHS)</p> <p>2. This is applicable for soft commodities such as agriculture, they are not relevant for forest management. Suggest to change the criterion to "If appropriate, the standard shall..." or n/a.</p> <p>3. "As currently written, 4. Management of Potentially Hazardous Substances reads as though its scope is broader than strictly forest management activities. It would be better to specify that the Potentially Hazardous Substances to be identified are confined to forest management activities.</p>	<p>1. Reference to MSDS removed.</p> <p>2 & 3. The requirement is meant to cover for any hazardous substances used and stored by the organisation for production or processing activities.</p>	4.1 The standard shall require that an inventory of hazardous substances used and stored is maintained.
New criterion	N/A	Created based on feedback from 4.1	4.2 The standard shall require that only officially registered products are used. Where no official registration exists, the standard shall require that guidance is provided on health, physical and environmental hazards in accordance with applicable national legal requirements.

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<p>The standard shall forbid the use of hazardous chemicals listed by WHO 1A and B and the Stockholm and Rotterdam conventions.</p>	<p>1. The standard should specifically reference these lists, e.g., in an Appendix, supplemental documentation or the standard criteria itself (or perhaps at least a link to where the lists can be found), so that this criteria is explicitly clear and the certified operations are not being relied upon to reference and follow these lists. The lists are not particularly easy to find. “Stockholm and Rotterdam Conventions” should clearly reference Rotterdam Convention Annex III which is the list of chemicals, and Stockholm Convention – which Annexes? A, B and C? Just A? A and B? We recommend A, B and C, though B and C are less directly relevant to agricultural production. Consider allowing standards to have an exemptions process to grant specific, limited uses of these chemicals. There are a small minority of these chemicals that are rodenticides for which there are no registered alternatives, and are in some cases necessary to protect workers health and safety as well as food safety, and can be use within an IPM framework (i.e., based on monitoring rodent populations) and with specific placements that minimise potential risks. I can help identify a full list if that’s helpful – offhand I see brodifacoum, bromadiolone, bromethalin, diphacinone and warfarin.</p> <p>2. For forest management operations this is an appropriate requirement.</p> <p>3. Is prohibit a better choice of words than forbid? Will there be a link to the references?</p>	<p>1. Reference to applicable appendixes has been included.</p>	<p>4.3 The standard shall forbid the use of hazardous chemicals listed by WHO (1A and B) and the Stockholm convention (A, B and C) and Rotterdam convention (Annex III).</p>

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The standard shall require specific procedures and controls to be in place for the management, storage, handling and disposal of all hazardous substances in order to minimise the potential for negative impacts on human health and the environment.	<p>1. Hazardous substances are not necessarily stored and handled. In forest management, the hazardous substance would be oil within machinery, which has potential negative impacts on the environment (but not human health). "The standard shall require that hazardous substances are managed in a manner that minimises the potential for negative aspects on the environment and/or human health.</p> <p>2. As currently written, 4. Management of Potentially Hazardous Substances reads as though its scope is broader than strictly forest management activities. It would be better to specify that the Potentially Hazardous Substances to be identified are confined to forest management activities. For forest management operations the management, storage, handling and disposal of hazardous substances are typically addressed with regulation.</p> <p>3. Introduce criteria on Chemical use, PPEs to workers, training to workers on chemical handling and use, etc.</p>	All: The scope of this requirement is any hazardous substance used by the organisations for its production or processing operations. It is not restricted to forestry management operations. For example, it is applicable for pesticides used in tree plantations.	4.4 The standard shall require that systems and processes shall be implemented for the safe handling, storage, use, transportation and disposal of all hazardous substances, in order to minimise the potential for negative impacts on human health.
The standard shall require that the environmental training program includes appropriate and adequate training on pollution prevention and response for all workers that handle or come into contact with pesticides or other hazardous substances.	<p>1. This is generally not relevant for forestry and should be n/a.</p> <p>2. Recommend that the requirement be revised to state that employees/contractors handling pesticides and other hazardous materials be trained in the appropriate procedures. In some jurisdictions they may also require licensing or permitting.</p>	All: Criterion deleted since it's covered by 4.4.	N/A

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The standard shall require that agrochemicals are applied using methods that minimise negative impacts on human health and the environment. Appropriate measures shall be implemented to prevent the drift, run-off, or spills of agrochemicals to neighbouring areas.	1. Agrochemicals are chemicals used in agriculture. This should be n/a for forest management.	1. This is covered now under pollution prevention and it does not refer to agrochemicals	N/A

● Chapter 5: Integrated Pest Management

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
The standard shall require that producers minimise the use of pesticides by practising Integrated Pest Management (IPM).	<p>1. Strongly recommend explicitly defining IPM criteria that a standard must include. At a minimum, basic IPM means regular, systematic monitoring and scouting for pests (insects, weeds, diseases, etc.) and making pesticide applications based on scouting results and economic thresholds. (Monitoring can also include use of predictive models, monitoring weather conditions, natural enemy populations; scouting means actually going into fields and looking for pests; for this reason suggest either including both terms or using "monitoring"). It should also specify that there are farm staff that can identify key pests and understand their biology, which is essential to implementing an IPM program, and require pest prevention measures (e.g., crop rotation, physical exclusion, resistant varieties), use of non-chemical pest management strategies (cultural, physical/mechanical, biological) and assessing pesticide risks and prioritising lower-risk options when using chemicals. Beyond that it could also address resistance management and annual evaluation of the pest mgmt program as a whole, and adapting as needed.</p> <p>2. The standard shall require that producers minimise the use of pesticides by practising Integrated Pest Management or IPM equivalent method.</p> <p>3. Use of integrated pest management strategies is an appropriate requirement for forest management operations.</p> <p>4. Is minimization of use of pesticides always the best, or should it be optimisation of use?</p>	<p>All: a chapter has been created for IPM requirements</p> <p>1. IPM practices included in 5.2</p> <p>4. Minimization has been replaced by Optimization</p>	5.1 The standard shall require that the organisation optimises the use of pesticides by practising Integrated Pest Management or an IPM equivalent method.

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New criterion		Created based on feedback from 5.1.	5.2 The standard shall require that the pest management practices include: <ul style="list-style-type: none"> - systematic pest monitoring (insects, weeds, diseases...) - use of non-chemical pest management strategies (cultural, physical/mechanical, biological) - monitoring the effectiveness of non-chemical control methods used - assessing pesticide risks and prioritising lower-risk options when using chemicals
The standard shall require that the use of agrochemicals is recorded, including the active ingredients used, the area treated, the amount applied per Ha and the number of applications.	1. Strongly recommend that records must also include the application rate (perhaps that's what is meant by "amount applied per Ha" but ""application rate"" is a more standard phrasing), and the date of application. Other highly recommended attributes include the full product/trade name, location/site of the application (this might be "area treated" but that's unclear as to whether it's looking for a number of acres/hectares, or the location/site, e.g., the name of the block/field/greenhouse treated.), applicator name. Ideally records would also include the target pest (this helps ensure applications are based on actual pest pressure), time of application, weather conditions (air temp and wind speed and direction) at the time of application, which helps ensure implementation of drift mitigation plans/strategies, application method, REI and registration number. Number of applications isn't useful/needed – there should be one record for each application made.	1. Application rate, date and location are required. 2 & 3. The criterion refers to pesticides now. 4. Number of applications deleted.	5.3 The standard shall require that the use of pesticides is recorded, including: <ul style="list-style-type: none"> - the product/trade name and active ingredients used, - the location treated, - the application rate (amount per Ha) and date, - the target pest and - the applicator's name

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	<p>2. Agrochemicals are chemicals used in agriculture. This should be n/a for forest management.</p> <p>3. Agrochemicals are not applicable to forest management activities - examples where the framework would benefit from a better defined scope.</p> <p>4. Why ask for the number of applications? The Recording will show the applications.</p>		

● Chapter 6: Soil Health

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
The standard shall require that land at risk of soil erosion and land that is already eroded are identified and that the suitability of the soil for production of specific crops is evaluated.	<p>1. (related to comments on 5.2) recommend expanding the scope to explicitly require that soil erosion is prevented, areas at risk of erosion are identified, and mitigation strategies are implemented. 5.1 seems to stop short of requiring that erosion is actively being mitigated and therefore not occurring, and where it is occurring, strategies are in place to address it.</p> <p>2. This is not relevant for forestry in the way it is written. Better: "The standard shall require that special care is given to sensitive soils and erosion prone areas. If appropriate, land at risk..."</p> <p>3. As written this is very difficult to address. Focus should be on the conservation of soil productivity. Recommend the requirement be revised to: 'The standard shall require that measures are taken to address sensitive soils and erosion prone areas thereby protecting soil productivity.'"</p>	All: rephrased to focus on soil erosion prevention	6.1 The standard shall require that areas at risk of erosion are identified and that measures for soil erosion prevention and mitigation shall be implemented.
The standard shall require that a soil Management Plan is established and implemented, including measures to maintain soil fertility, avoid soil erosion, use fertilisers efficiently and promote soil recovery.	<p>1. • Recommend a focus on the implementation of practices that promote soil health, rather than a focus on documentation of plans. The measures addressed here – soil health, erosion and fertiliser use – can be better addressed through specific criteria focused on these aspects of soil health.</p> <p>• Recommend a more holistic focus on “soil health” rather than “soil fertility” which suggests a narrower focus on soil’s ability to support the particular crop.</p> <p>• Recommend removing reference to erosion here, since it is covered in 5.1 (see above for recommended changes to 5.1)</p> <p>• Recommend a requirement that fertiliser use is based on nutrient management planning, i.e., that nutrient application rates are based</p>	<p>All: rephrased to focus on soil erosion. Fertiliser use covered now by 6.4 and 6.5</p> <p>3. Reference to a soil management plan has been deleted.</p>	6.2 The standard shall require that measures to maintain soil health and promote soil health recovery shall be implemented.

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	<p>on the crop need and available nutrients in the soil/growing medium. This should be its own criteria.</p> <p>2. This is not relevant for forestry in the way it is written. Better: "The standard shall require that areas that fulfil specific and recognised protective functions, including sensitive soils and erosion-prone areas, are mapped and management plans ensure that they are maintained and enhanced to maintain soil fertility, avoid soil erosion, use fertilisers..."</p> <p>3. A soil management plan should not be a specific requirement provided soil productivity, soil health and soil erosion are addressed elsewhere in the requirements.</p>		
The standard shall require that the use of fertilisers is recorded and soil health monitored on a regular basis.	<p>1. Recommend that fertiliser application recordkeeping and soil testing are two separate, distinct criteria, rather than combined into one. Additionally, recommend addressing what "soil health" monitoring means specifically – testing for basic macronutrients like N, P, K, and pH, are part of nutrient management planning and making sure the crop gets enough nutrients, but don't really reflect soil "health". Soil health monitoring would require different indicators than a "standard" soil test for NPK and pH. (The exception is that standard tests generally include organic matter, which is a component of soil health.) Really, both things should be happening, 1) soil testing for NPK, pH and organic matter, which is part of nutrient management planning, and 2) monitoring soil health including soil organic matter and other measures like aggregate stability, compaction, infiltration rate, measures of the microbial community. Soil Health Institute recommends three metrics for soil health – soil organic carbon, carbon mineralization potential and aggregate stability.</p> <p>2. To make this more relevant for forestry, consider "The standard shall require that fertiliser use shall not be an alternative to</p>	<p>1. Requirement on soil health and fertiliser use splitted as required. Record keeping of fertiliser use added.</p> <p>2. Requirement on the use of fertilisers based on soil needs added.</p>	6.3: The standard shall require that soil health is measured and monitored on a regular basis, as appropriate.

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	appropriate soil nutrient management and, if appropriate, the use of fertilisers is..." 3. Soil fertilisers are considered a forest chemical and therefore their use is typically addressed with legal requirements.		
New criterion		Created based on feedback from 6.3	6.4 The standard shall require that fertiliser use is based on the crop needs and available nutrients in the soil.
New criterion		Created based on feedback from 6.3	6.5 The standard shall require that the use of fertilisers is recorded.

● Chapter 7: Energy Use and GHG Emissions

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
The standard shall require that the supplier measures its energy consumption and that types of energy sources used for production, processing and transport are quantified and documented.	<p>1. Consider combining Energy use and GHG Emissions into a single section. These two topics are inextricably linked. Energy efficiency practices (6.2) will reduce GHG emissions, and records of energy use (6.1) are needed to conduct a GHG emissions analysis.</p> <p>2. Not relevant for forestry. Should be n/a.</p> <p>3. Not applicable to Forest Management Standards. An example where the framework would benefit from a better defined scope - energy use is not quantified by any Forest Management Standard.</p>	<p>1. Energy use and GHG Emissions now into a single section.</p> <p>2 & 3: Energy use and GHG emissions are relevant for forestry also (e.g., logging and transportation equipment...).</p>	7.1 The standard shall require that the energy consumption is measured and monitored, and that types of energy sources used for production, processing and transport are quantified and documented.
The standard shall require that energy efficiency mechanisms are in place to reduce the use of energy per unit of product and to optimise the use of renewable energy.	<p>1. Consider making these two distinct criteria; energy efficiency, and use of renewables. They are really two distinct practices that would be implemented separately in practice. Feels like perhaps too high of a bar to outright require use of renewable energy, so perhaps this is focused on energy efficiency in order to optimise energy usage (which would include optimising use of any renewables, without requiring use of renewables).</p> <p>2. "Split in two requirements (optimization/reduction and use of renewables). More criteria on energy use can be added"</p> <p>3. Not relevant for forestry. Should be n/a.</p> <p>4. "Not applicable to Forest Management Standards. An example where the framework would benefit from a better defined scope - energy use is not quantified by any Forest Management Standard.</p>	<p>1 & 2. Rephrased as suggested as criteria 7.2 and 7.3</p> <p>3 & 4: Energy efficiency and use of renewable energies are applicable to forestry (e.g., logging and transportation equipment...).</p>	7.2 The standard shall require that energy efficiency measures shall be implemented to reduce the use of energy per unit of product.

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
New criterion	N/A	Created based on feedback from 7.2	7.3 The standard shall require that measures shall be implemented to optimise the use of renewable energy.
The standard shall require that the supplier measures and maintains records of its GHG (Greenhouse Gas) emissions.	<p>1. Recommend removing (or, if kept, narrowing to scopes 1 and 2). This is a very high bar for an average grower, and especially for smaller growers with limited resources or those outside of the US, to expect them to conduct and maintain a GHG emissions analysis, given it's not something that can be done without using specific tools/calculators. (and there are still a lack of grower-friendly tools even in the English language for growers to achieve this.) We recommend instead focusing on achieving the same objective, i.e., reduction in GHG emissions, through practice-based avenues like building soil health, cover cropping or other ways to keep the soil covered, carefully managing nutrient inputs through nutrient mgmt planning (both addressed in comments above), monitoring and reducing energy and fuel use (addressed in section 6), avoiding pesticide applications through use of IPM (applications based on monitoring and thresholds which avoids any unnecessary applications, addressed in section 5). All of those practices contribute to reduced GHG emissions.</p> <p>2. Not relevant for forestry. Should be n/a.</p> <p>3. "Not applicable to forest management (supplier measurement and recording of GHG emissions). An example where the framework would benefit from a better defined scope.</p>	<p>1. Scope narrowed to 1 and 2</p> <p>2 & 3: reduction of GHG emissions is applicable to forestry</p>	7.4 The standard shall require that scope 1 and 2 GHG (Greenhouse Gas) emissions are measured and monitored.

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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
The standard shall require that mechanisms are in place to reduce GHG emissions.	1. Not relevant for forestry. Should be n/a. 2. Recommend that the requirement be revised to focus on strategies an organisation can employ to demonstrate how they are addressing GHG emissions from forest operations.	1. Reduction of GHG emissions is applicable to forestry. 2. Continuous improvement is already covered elsewhere.	7.5 The standard shall require that measures shall be implemented to reduce GHG emission in line with applicable protocols.

● Chapter 8: Water Protection

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
The standard shall require that sources of water used for irrigating and processing are identified.	<ol style="list-style-type: none"> For the water section, recommend a greater focus on tracking and efficiency (7.3 is the most impactful criteria here. We would argue that the first two criteria aren't impacting or improving environmental sustainability, they are more so prerequisites to it. <ul style="list-style-type: none"> Also recommend a new criteria requiring irrigation based on crop need. More criteria could be added on water use (crop selection, irrigation techniques). Not relevant for forestry. Should be n/a. Better to introduce criteria that ensure that water resources are protected, such as "The standard requires that special care shall be given to operations in areas with water protection functions to avoid adverse effects on the quality and quantity of water resources Not applicable to Forest Management Standards. An example where the framework would benefit from a better defined scope - use of water for irrigation and processing is not applicable for forest management standards. 	<p>1 & 2. Criterion added requiring irrigation based on crop needs.</p> <p>3 & 4: Might be applicable for forestry (e.g., irrigation of plantations and seedlings, cleaning and cooling of engines and equipment, etc).</p>	8.1 The standard shall require that sources of water used for production and processing, if any, are identified.
The standard shall require that the supplier measures and maintains records of its water consumption for irrigating and processing.	<ol style="list-style-type: none"> Not relevant for forestry. Should be n/a. Better to introduce criteria that ensure that water resources are protected, such as "The standard requires that special care shall be given to operations in areas with water protection functions to avoid adverse effects on the quality and quantity of water resources As per above - not applicable to Forest Management Standards. 	<p>1 & 2: Might be applicable for forestry (e.g., irrigation of plantations and seedlings, cleaning and cooling of engines and equipment, etc).</p>	8.2 The standard shall require water consumption for production and processing is measured and monitored.

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
	An example where the framework would benefit from a better defined scope - use of water for irrigation and processing is not applicable for forest management standards.		
The standard shall require that water efficiency mechanisms are in place to reduce the use of irrigating and processing water.	<p>1. Not relevant for forestry. Should be n/a. Better to introduce criteria that ensure that water resources are protected, such as "The standard requires that special care shall be given to operations in areas with water protection functions to avoid adverse effects on the quality and quantity of water resources</p> <p>2. Not applicable to Forest Management Standards. An example where the framework would benefit from a better defined scope - use of water for irrigation and processing is not applicable for forest management standards.</p>	1 & 2: Might be applicable for forestry (e.g., irrigation of plantations and seedlings, cleaning and cooling of engines and equipment, etc).	8.3 The standard shall require that measures shall be implemented to reduce the use of production and processing water.
New criterion	<p>1. Not relevant for forestry. Should be n/a. Better to introduce criteria that ensure that water resources are protected, such as "The standard requires that special care shall be given to operations in areas with water protection functions to avoid adverse effects on the quality and quantity of water resources</p> <p>2. Not applicable to Forest Management Standards. An example where the framework would benefit from a better defined scope - use of water for irrigation and processing is not applicable for forest management standards.</p>	1 & 2: Might be applicable for forestry (e.g., irrigation of plantations and seedlings, cleaning and cooling of engines and equipment, etc).	8.4 The standard shall require that measures shall be implemented to avoid the depletion of groundwater resources beyond its recharge capacity.
The standard shall require that a drainage plan is in place describing the identification of contaminants, wastewater flow direction, discharge points and potential impact.	<p>1. Not relevant for forestry. Should be n/a.</p> <p>2. As written this criterion could be interpreted more broadly. An example where the framework would benefit from a better defined scope specific to forest management operations - what types of contamination and wastewater are the focus of this requirement.</p>	1 & 2: Criterion deleted.	

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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
New criterion		Added based on feedback from 8.1.	8.5 The standard shall require that measures shall be implemented to ensure that irrigation is tailored to the crop needs.
The standard shall require that mechanisms are in place to improve the quality and reduce the volume of wastewater effluents, including basic on-site wastewater treatment or connection to offsite wastewater treatment system.	<p>1. Not relevant for forestry. Should be n/a.</p> <p>2. This type of criterion (control of wastewater effluents) is not required in forest management standards. An example where the framework would benefit from a better defined scope.</p>	1 & 2: It might be applicable to forestry (e.g, wastewater from cleaning machinery and equipment).	8.6 The standard shall require that measures shall be implemented to improve the quality and reduce the volume of wastewater effluents from production and processing operations.

● Chapter 9: Waste

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
The standard shall require that systems and processes are in place to manage waste generation, reduction, storage, transportation, and disposal.	<p>1. Unclear on what benefit is gained from this criterion, recommend removing. It feels like this is essentially stating the obvious, because what is the alternative? An operation has to have some sort of system in place to manage waste. We recommend that this section focus more on what the desired system and processes look like. E.g., how does the waste management system reduce waste to landfill? This can be achieved by reducing overall waste generated and promoting diversion strategies like recycling, reuse, composting or others.</p> <p>This section feels very focused on operations but doesn't fully address environmental sustainability of waste at the farm-level, and is more focused on measuring but not on improvement, i.e., promoting practices that decrease waste to landfill.</p> <p>It also seems like a gap that this section doesn't address food loss and how it is diverted from landfill through strategies like feeding hungry people, feeding animals, energy uses or compost (see US EPA food recovery hierarchy for the suite of diversion strategies).</p> <p>2. As written this criterion could be interpreted more broadly - what types of waste is the requirement focused on? An example where the framework would benefit from a better defined scope."</p>	<p>1. Criteria have been added concerning food waste and resource recovery.</p> <p>2. This section refers to waste and residues resulting from operations and processing.</p>	9.1 The standard shall require that systems and processes are implemented for the safe handling, storage, transportation and disposal of waste.

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
New criterion		Added based on feedback from above.	9.2 The standard shall require that systems and processes shall be implemented for resource recovery, including repurpose, reuse, compost or recycle of residues and waste.
New criterion		Added based on feedback from above.	9.3 The standard shall require that systems and processes shall be implemented to prevent the excessive loss of food crops and other agricultural products during harvest and on-farm storage.
The standard shall require that hazardous and non-hazardous waste is segregated and employee awareness and training provided on handling and segregation of waste.	1. Not relevant for forestry. Should be n/a. 2. "As written the requirement could be interpreted to be broader in scope than forest management. An example where the framework would benefit from a better defined scope."	All: this criterion has been deleted since it is already covered in Chapter 4.	

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
The standard shall require that no on-site uncontrolled waste landfilling is undertaken and that waste shall not be incinerated or burned, except when required for phytosanitary purposes, or in cases when it is burned for energy or heating, or used for biogas/oil production.	<p>1. Various issues need to be addressed. Perhaps better to split in more than one criteria</p> <p>2. Incineration and burning of waste is an absolute no-go in forestry for obvious reasons. Better: "... and that waste shall be removed in an environmentally-friendly manner...</p>	1 & 2: This criterion has been rephrased for clarity.	9.4 The standard shall require that open-air burning of residues, wastes or by-products is avoided and, where possible, eliminated.
The standard shall require monitoring and measurement of waste generated and recycled.	<p>1. Recommend aligning this with updated criteria suggested above, i.e., measuring overall waste generated and waste diverted from the landfill through all diversion strategies, not just recycling.</p> <p>2. I propose to reword this requirement to "The standard shall require monitoring and measurement of waste generated and recycled, recovered and eliminated." as recycling is just one of the ways to recover waste.</p> <p>3. Not relevant for forestry. Should be n/a.</p> <p>4. An example where the framework would benefit from a better defined scope.</p>	<p>1 & 2: Criterion now requires recording of waste diverted from landfill.</p> <p>3 & 4: Waste reduction is applicable to forestry (e.g. waste materials generated in forestry operations, such logging residues, waste oil and lubricants...).</p>	9.5 The standard shall require that the waste generated and diverted from the landfill is measured and monitored.

● Chapter 10: Land Use and Biodiversity

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
The standard shall require that biodiversity values and sensitive, high conservation value (HCV) and protected areas, within or outside the production sites, are identified.	<p>1. This section feels overly focused on officially/legally designated protected areas while ignoring the potential for the farm environment to provide habitat that supports biodiversity within the agroecosystem. While it's not feasible to require that standards require farmers create pollinator habitat, for example, there is opportunity to recognize/require the incorporation of features that support habitat and biodiversity, e.g., use of cover crops, diverse crop rotations (3 or more crops), vegetative buffer strips, fields left fallow, plantings that attract beneficial insects or provide forage for pollinators, grass waterways - anything that adds diversity to the agroecosystem will support biological diversity. Recommend a criteria requiring minimising the risks associated with pesticide use on non-target species.</p> <p>2. If scoped to forest management activities, this requirement is appropriate. In many jurisdictions it is typically addressed with regulation.</p>	<p>1. These are minimum requirements and regenerative agriculture is a good practice. Requirements to improve ecosystems might be included in the future.</p>	10.1 The standard shall require that areas within or close to the production or processing sites that fall under the definition of high conservation value (HCV), ecologically important or special sites or protected areas are identified.
The standard shall require that production or processing does not occur in protected areas or their officially designated buffer zones except where it complies with applicable legislation.	<p>1. HCV points to a specific methodology, yet there is a range of alternative methodology available. It may be more appropriate to use a more generic term such as "ecologically important areas"</p> <p>2. The reference to HCV points to a specific methodology. There are a range of alternative methodologies available. It may be more appropriate to use a more generic term such as "ecologically important areas".</p>	<p>1 & 2. The chapter now refers to HVC, ecologically important areas, special sites and protected areas.</p>	11.2 The standard shall require that production or processing does not occur in areas that fall under the definition of high conservation value (HCV), ecologically important or special sites or protected areas, or their officially designated buffer zones.

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
The standard shall require that natural forests or other natural ecosystems are protected from conversion to agriculture, plantation forestry or other land uses.	<p>1. HCV points to a specific methodology, yet there is a range of alternative methodology available. It may be more appropriate to use a more generic term such as "ecologically important areas"</p> <p>2. As written this requirement could be difficult to implement as it is dependent on the definition of terms like 'natural forests, or other natural ecosystems', & 'plantations'. Better to focus the requirement on the conversion of forests to non-forest.</p>	1 & 2. Definitions of natural forests, natural ecosystems & plantations will be included in the Glossary	<p>10.3 The standard shall require a written deforestation/conversion policy:</p> <ul style="list-style-type: none"> - committing to prevent the conversion of natural forests, or other natural ecosystems, to agriculture, plantation forestry or other land uses; - identifying the regions of application and relevant natural forest and ecosystems types, and - defining deforestation cut-off dates(s) in line with deforestation protocols.
The standard shall require that the producer avoids, remedies or mitigates negative environmental impacts, which may arise from the producer's activities, on biodiversity values and the quality of sensitive, HCV and protected areas.	1. HCV points to a specific methodology, yet there is a range of alternative methodology available. It may be more appropriate to use a more generic term such as "ecologically important areas"	1. The chapter now refers to HVC, ecologically important areas, special sites and protected areas.	10.4 The standard shall require that the organisation avoids, remedies or mitigates negative environmental impacts, which may arise from the organisation's activities, on biodiversity values and the quality of areas that fall under the definition of natural forests, high conservation value (HCV), ecologically important or special sites or protected areas.
New criteria	1. Introduce criteria on burning (agriculture burning, slash and burn agriculture, etc)	1. Added based on feedback.	10.5 The standard shall require that fire is not used for preparing or cleaning fields, except when specifically justified in the IPM plan.

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
The standard shall require that the producer monitors the biodiversity values and the quality of sensitive, protected and HCV areas.	<p>1. This is incredibly onerous and not feasible, and unclear what types of positive outcomes this would drive. How is a producer, on top of the job of farming, supposed to “monitor biodiversity value and quality” of sensitive, protected or HCV areas? Is the expectation to do this even when these areas are outside of the boundaries of the farm (as stated in 10.2)? That would essentially require hiring a full-time biologist - this is feedback we've heard from growers in South and Central America.</p> <p>2. HCV points to a specific methodology, yet there is a range of alternative methodology available. It may be more appropriate to use a more generic term such as "ecologically important areas".</p> <p>Also, it is not the biodiversity values that should be monitored, but the overall environmental values (as they include biodiversity. Better: "... monitors the environmental values...</p> <p>3. HCV points to a specific methodology. There are a range of alternative methodologies available. It may be more appropriate to use a more generic term such as "ecologically important areas.</p>	All: this criteria has been replaced by 3 focusing on protection of native habitats and rare or endangered species and preventing invasive species.	10.6 The standard shall require native habitats and natural communities within or close to the production or processing sites are protected.
New criterion		Created based on feedback from 10.6.	10.7 The standard shall require that endemic, rare, threatened or endangered species permanently or temporarily present on the production or processing sites are protected. Hunting or collecting of these species shall not be allowed.

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Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
New criterion		Created based on feedback from 10.6.	10.8 The standard shall require that measures are implemented to prevent invasive species from invading areas outside the production or processing sites.

● Chapter 11: Animal welfare (for livestock only)

Draft Benchmarking Criteria	Stakeholder Comments Received	SSCI Responses	Final Criteria
New criterion	1 How about adding a requirement for animal welfare?	1. Added applicable to livestock farming	11.1 If applicable, the standard shall require that adequate measures for animal welfare are implemented.