



Public Consultation Fair for Life & For Life Summary of Feedback & Replies

Foreword

Thank you!

We would like to thank all the stakeholders who participated, during almost one year, in the overall revision of the Fair for Life and For Life schemes.

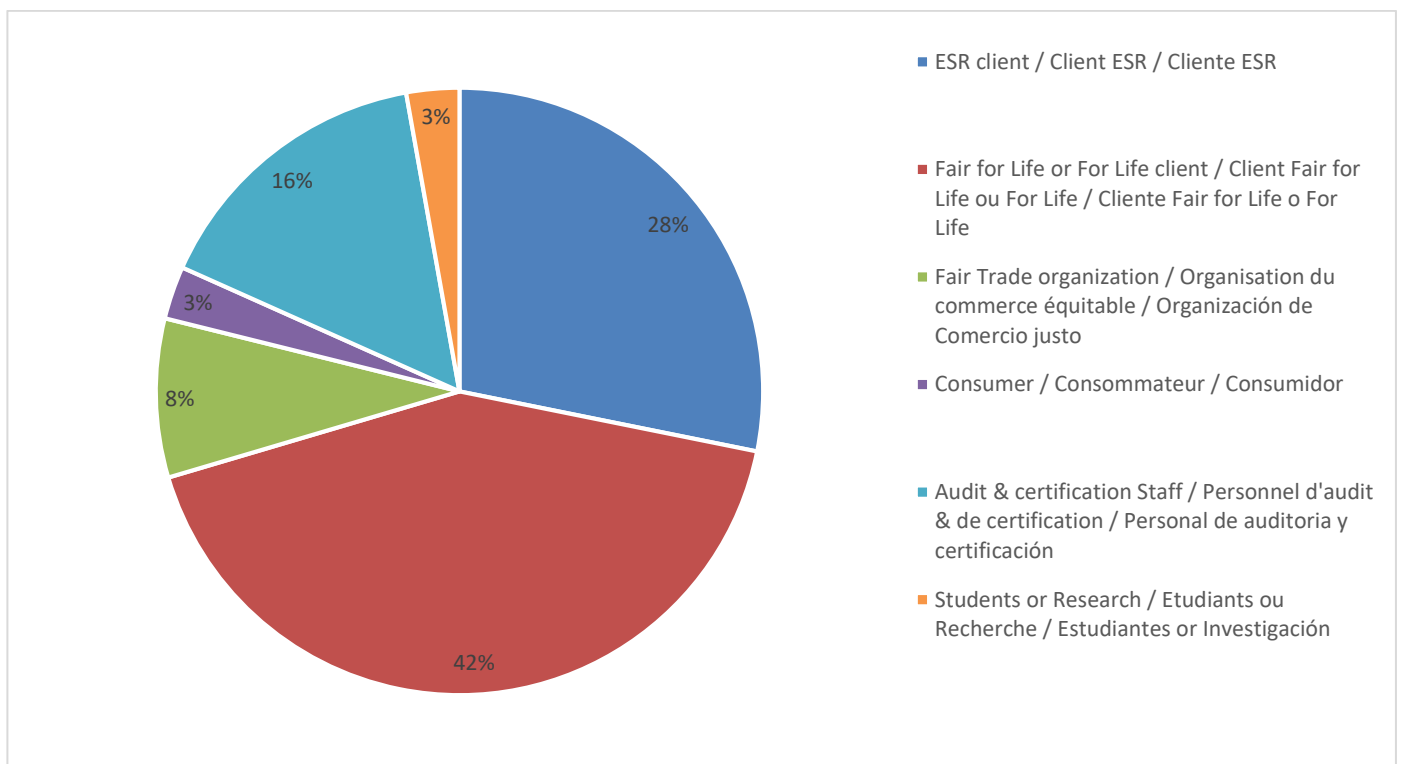
We particularly would like to thank our FFL & FL Scheme Committee, who actively contributed to this work, through its expertise and continuous commitment.

Good reading!

An important review process began in March 2016, punctuated by different phases of consultation. On **November 2, 2016**, the first draft of the revised ESR & FFL programs was published. Stakeholders were invited to comment before December 12th on both the FL and FFL standards through:

- A questionnaire;
- Directly by email.

Seventy-one stakeholders participated in the consultation (60 via the questionnaire, 11 by email). Their distribution is illustrated in the diagram below:



More precisely:

- **Regarding the 50 participants in the categories "ESR Client" & " FFL Client":**
 - o The Producers' excellent participation was noted, accounting for almost half (23/50).
 - o The food (43 participants) and cosmetics (7 participants) sectors were the only ones represented.
- Finally, from a geographical point of view, a great diversity was noted: 24 countries represented.

The following sections present the feedback from the various stakeholder groups and the responses provided by FFL / FL.

Not present in this document:

- Minor errors in the formulation and / or translation are not included. These have been corrected and we thank those who identified them.
- Some amendments aiming to strengthen the universality of the standard, by the choice of words and adapted examples, are not presented.
- Amendments aiming at considering the new definition of Producer Operation, which now more explicitly refers to complex / mixt situations (see section Terms and definitions), are not all presented.

The feedback is organised according to the order of the chapters of the standards. When the feedback relates specifically to FFL, an orange color code is applied. When the feedback relates specifically to FL, a blue color code is applied.



The codification of criteria used in this document corresponds to the criteria that were used in the draft version presented in November for public consultation, and not to the final published version. At the end of this document, an annex presents the correspondence between the previous criteria codes and the new ones.

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General Feedback on the Standards

Clarity, readability: In general, stakeholders considered that the new standards were clear and well structured.

Completeness, universality:

The standards are generally considered to be very comprehensive. However, the stakeholders stressed the need:

- 1) To adapt the control methods according to different contexts.
- 2) To adopt terms and illustrations that are compatible with different contexts.

Indeed, since the standard is universal, it will have to adapt to different types of actors and to different countries.

FFL / FL Response:

- 1) *Control methods are defined in a separate document, The Certification Process. This document specifies that the process is cyclical. The initial audit will permit an analysis of the risks presented by the operations and adaptation according to the in-depth aspects during the monitoring audits. A renewal audit, taking place every 4 years, provides the opportunity to assess these risks and areas of corresponding investigation.*
- 2) *The terms and illustrations have been adapted (the detail is not transcribed in this document).*

Introductory Chapter

Vision, Mission and Objectives:

A fair trade organisation suggested that the parts relating to the vision, mission and objectives of the standards be expanded. Indeed, these sections do not sufficiently or explicitly reflect the spirit and ambitions of the standard.

FFL / FL Response: These parts have been rewritten in order to clarify them.

Scope and At-Risk Species (threatened species):

- For the handcrafts, it is written that raw materials should not be sourced from at-risk species. A stakeholder suggested clarifying the reference lists used to determine this status.

FFL / FL Response: This has been clarified in relation to the TRAD-40 criterion which describes the raw materials allowed for handcrafts.

- Criterion ENV-68 prohibits the commercial use of species protected by the IUCN. This seems to imply that these products cannot be certified regardless of the concerned sector. One stakeholder suggested accepting some products provided that a standard such as FairWild is applied as a supplementary certification¹. This could lead to an openness in:
 - o Recognizing the potential for the sustainable use of protected resources, to contribute to livelihoods and to provide incentives to the conservation of these species;
 - o Recognizing that certain species can be protected at a global level, but are not necessarily in decline in some regions.

FFL / FL Response: We have clarified which species could not normally be certified in relation to criterion ENV-68. Since the FairWild standard is one of the standards recognized by FFL (Appendix IV), an exception may be made to accept certain FairWild certified species as they are under additional protection.

Accounting for Units Size

Several stakeholders noted that the way the size of units were determined was:

- Complex (differs depending on whether the "management unit" has operations linked to the primary production or not)
- Not necessarily relevant (the number of employees is not a sufficient indicator)

FFL / FL Response: We simplified the rules and allowed that in some exceptional cases the categories be redefined by the inspector during the initial audit, depending on factors such as the revenue generated by the activity. However, we would like to emphasize that while it is true that ideally a set of more complex factors should be taken into account in determining the size of the units, the number of employees remains a good indicator of the management / management capacity which can be expected from an operation. In many countries, legal obligations attributable to companies evolve according to this criterion.

¹ The FairWild standard includes the commercial use of threatened species in its scope, but with extended management and monitoring criteria.

Two stakeholders noted that the differences in the number of criteria applicable between the "Small", "Medium" and "Large" categories were fairly low. They suggested accentuating these differences by, for example, making more criteria for "Medium Units" non-applicable.

FFL / FL Reply: The distribution of the criteria according to the size of the units has been revised on the basis of the feedback from the stakeholders (see details in the different parts below). Moreover, the size of the units does not only determine the applicability of a criterion, but also, on occasion, the year from which it becomes mandatory.

Chapter 1. Eligibility: Core Values and Strategies

› General Feedback

Fifteen stakeholders expressed their views on the different sections of this chapter. Among them we can distinguish:

ESR / FFL or FL certified operations	11
Fair Trade Organisations	1
Audit and Certification Personnel	3

› Requests for Changes / Clarifications

Theme	Criterion	Request for amendment / clarification	FFL / FL Response
Social / Environmental Violations Committed 10 Years Ago	ELIG-2, 3 (In conjunction with ENV-69)	Two stakeholders considered it unfair to penalize companies for acts committed 10 years previously. On the contrary, fair trade should allow companies to move towards more positive practices. Participants suggested that these criteria be mitigated by taking into account: <ul style="list-style-type: none"> - the nature of the social or environmental violation committed; - corrective/preventive actions implemented by the company 	<i>The criteria have been modified to allow companies that have developed a policy to repair the damage / mitigate impacts caused by past violations. The criterion ENV-69, linked to these criteria, was also revised.</i>
Eligibility "North-North"	ELIG-6 (in connection with POL-08)	Four stakeholders felt that this criterion was not adapted to North-North trade. This criterion requires, when it is not possible to identify marginalised beneficiaries, the clear presentation of long-term impacts. The stakeholders feel that this adds an additional and irrelevant administrative complexity ² .	<i>ELIG-6 has been revised: the concept of "marginalisation" has been replaced by "economic disadvantage", which can more easily be applied in all contexts. The criterion POL-8, linked to criterion ELIG-6, was also revised accordingly.</i>
Eligibility of "very large estates / farms / plantations"	ELIG-7, 8, 9	Seven stakeholders considered these criteria too restrictive: <ul style="list-style-type: none"> ELIG-7: the letter of recommendation adds an administrative complexity deemed unnecessary ELIG-8: the requirement of a minimum commitment of 3 years in a "CSR approach" seems arbitrary (why 3 years?) ELIG-9: The restriction to projects supporting small producers or particularly marginalized workers is deemed excessive and will exclude too many projects. 	<i>ELIG-7 has been deleted but a more general criterion was added: in the case of doubt on the coherence of the operation's commitment (including aspects in the criteria ELIG-1 to 5 on ethical values), the CB reserves the right to request a recommendation from external stakeholders or to carry out a formal consultation with his stakeholders. This allows for an initial analysis of the candidate. ELIG-8 has been reduced and no longer mentions a minimum duration of 3 years.</i>

² Although they understand that for historical reasons the Fair Trade prioritizes marginalized producers in developing countries, there is a larger number of producers who need access to markets and to be supported in the development of sustainable chains, beyond both economic and geographic borders.

			<i>ELIG-9 was simplified, but "Plantations" continue to be accepted in FFL only in exceptional cases. Those that do not meet these conditions will continue to be redirected to the FL.</i>
	ELIG-8	<p>Considering that:</p> <ul style="list-style-type: none"> - Plantations not eligible for the FFL standard can be committed to the FL standard - FL labeling is limited to products containing more than 80% of FL ingredients <p>One stakeholder noted that this limited the possibilities of mixing FL and FFL ingredients within the same product.</p>	<i>The possibilities of mixing Fair for Life and For Life ingredients within the same product are quite limited.</i>
Organized Small-Scale producers vs Plantations and Contracted operations	ELIG-6 to 9	<p>Considering that the fair trade movement is historically oriented towards small-scale organized producers, one Fair Trade Organization noted that:</p> <ol style="list-style-type: none"> 1) although there are restrictions on "Plantations", the standard does not sufficiently state its positioning in relation to small producers (this is explicitly stated only in the Guide column of Criterion ELIG-9, and in Annex IV). 2) the standard should more clearly outline its positioning in relation to Contract Production companies and to all systems where potential beneficiaries are not formally organised. 	<i>FFL's positioning on these issues was clarified. Priority is given to small-scale producers, whatever their initial degree of organization. A new criterion has been introduced for Contract Production companies, related to the Fair Trade diagnosis. In contract production settings, this diagnosis shall enable to assess the needs and possibilities with regards to organization strengthening.</i>

› Other clarifications

Besides, a clarification was made related to the FL/FFL certification scope in the particular cases where a given entity:

- 1) had different activities
 - 2) was composed of different sites
 - 3) was supervising different sub-groups of producers;
- ...And wished to integrate only part of its activities / sites / sub-groups in its certification scope.

Chapter 2. Fair Trade Policy / CSR: Commitment and Follow-up

› General Feedback

Nine stakeholders expressed their views on the different sections of this chapter. Among them we can distinguish:

ESR / FFL or FL certified operations	6
Fair Trade Organizations	2
Audit and Certification Personnel	1

› Re-organisation of criteria

This part now includes all the different steps to follow when implementing a CSR / FT policy:

1. Diagnosis
2. Policy
3. Action Plan
4. Follow-up

› Requests for modification / clarification

Theme	Criterion	Change request	FFL / FL Response
CSR Policy	Chapter 2.1 and 2.2	Two stakeholders noted that some components of the ISO 26000 ³ are missing in the For Life standard. Normally a CSR policy: <ul style="list-style-type: none"> - Corresponds to a business approach with a precise governance structure; - Includes a stakeholder map; - Includes an annual administrative review or another formal mechanism of continual improvement. 	<p><i>We have strengthened these aspects by introducing requirements related to:</i></p> <ul style="list-style-type: none"> - <i>Mapping Stakeholder;</i> - <i>The establishment of a CSR action plan;</i> - <i>Continuous improvement.</i>
Fair Trade Policy	POL-8	Three stakeholders considered this requirement unrealistic, especially in year 1: establishing an initial diagnosis of the socio-economic situation of potential beneficiaries requires skills that production operations do not necessarily have. This may discourage them.	<p><i>In conjunction with ELIG-6, this requirement has been revised to require less formalisation.</i></p> <p><i>This criterion has been split into 3 criteria, with 2 criteria related to the Fair Trade diagnosis (one for all settings, one specific to the contract production situations).</i></p>
Fair Trade Strategic Plan	POL-11	A fair trade organisation found that this requirement, although central, was weak. It should include clear and progressive commitments from committed companies, in particular for small producers.	<p><i>This requirement was strengthened, and it was more explicitly linked to 3 other requirements that also dealt with long-term fair trade supply:</i></p> <ul style="list-style-type: none"> - <i>TRAD-4 (Long-Term Relationships)</i> - <i>TRAD-12 (Procurement Plan)</i>

³ The reference standard for Corporate Social Responsibility

			<ul style="list-style-type: none"> - <i>CONS-13 (2 years Action Plan to "convert" non-fair trade ingredients to fair trade ingredients)</i> <p><i>Additionally, a criterion linked to the follow-up of this strategic plan was introduced.</i></p>
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Chapter 3. Human rights and working conditions

› General feedback

Twenty-three stakeholders expressed their views on the different sections of this chapter. Among them we can distinguish:

ESR / FFL or FL certified operations	10
Fair Trade Organisations	4
Audit and Certification Personnel	9

Generally:

- Some participants found this section **too detailed / rigorous** for Small units, small producer organisations or even those who are developing within a strict social and legal context.
- **In contrast**, others have expressed concerns that certain aspects are **not detailed / rigorous enough**, or wished that the criteria that are so far not applicable to small producers become applicable.

In our answers, we decided to clarify / detail the requirements where it was deemed relevant. Again, as a reminder, the social context relative to each country / sector / activity will be taken into account in order to carry out the most appropriate and relevant control of the social aspects (see "General Feedback on the Standards").

› Application to Smaller Units

For the criteria below, 1 or more stakeholders have deemed it necessary that they also apply to Small units. Indeed, Small units can employ 1 or more employees. For certain fundamental criteria, the latter must enjoy the same protection as in Medium and Large units.

Theme	Criterion	FFL / FL Response
Forced labor: family of employees must not be obliged to work	SOC-3	<i>The criterion was applied to Small Units also.</i>
Forced labor: no debt obliging the worker to remain	SOC-4	<i>The criterion was applied to Small Units also.</i>
Communication / information on the right to collective organisation	SOC-6	<i>The criterion was applied to Small Units as well. It was pointed out that at the level of small units, basic oral communication could be accepted.</i> <i>This criterion has been the subject of other requests for modifications, see tables below.</i>

No measures to discourage workers from organising themselves	SOC 8	<i>The criterion was applied to Small Units as well.</i>
The organisation of employees is authorized	SOC 9	<i>The criterion was applied to Small Units as well.</i>
Meetings of employee representatives are not restricted	SOC-10	<i>The criterion was not made applicable to Small Units because the aspects are already covered in a general way in SOC-8 and SOC-9.</i>
Where national law limits the right of association and collective bargaining: election of authorized representatives	SOC-11	<i>The criterion was applied to Small Units as well.</i>
Employees using the complaint procedure neither punished nor intimidated	SOC-13	<i>This criterion is linked to the previous criterion (SOC-12), concerning the definition of a complaint procedure. Since this procedure is not required for Small units, SOC-13 has not been applied to Small units.</i>
Sexual Harassment Complaint Mechanism	SOC-26	<i>This criterion was made applicable to Medium-sized units. However, in order to not burden the administrative work of Small units, and since SOC-25 covers the issue of sexual harassment more broadly, SOC-26 has not been made applicable to Small units.</i>
Unobstructed emergency exits	SOC-57	<i>This criterion was made applicable to Small units, with the level requirement as "MUST Year 4". For the sake of differentiation, the level of the criteria was modified for Medium units (MUST Year 1 → MUST Year 3).</i>
Staff trained in first aid	SOC-59	<i>This criterion was made applicable to Small units, with the level requirement as "MUST Year 4". For the sake of differentiation, the level of the criterion was modified for Medium units (MUST Year 4 → MUST Year 3) and for Large units (MUST Year 4 → MUST Year 2). See tables below.</i>
Decent income	SOC 70	<i>The criterion was made applicable to Small units, with the level "BONUS". See tables below.</i>
Paystubs	SOC-76	<i>The criterion was made applicable for the Small units with the requirement a MUST Year 4. However, the criterion has been reformulated in order to allow a better consideration of the size of the units: any type of documentation can be accepted (including pay slips), provided that it contains the elements requested. For Small units, this may take the form of a record of payments.</i>
Paid annual leave	SOC-95	<i>The criterion was made applicable to Small units as well. See tables below.</i>
Paid holidays	SOC-97	<i>In order to lighten the control of Small units, and since this criterion complements SOC-95, it has not been made applicable to them. See tables below.</i>
Improvement plan if substantial differences between "regular temporary" employees and permanent employees	SOC-99	<i>The criterion also applies to Small units, with the requirement level "MUST Year 3".</i>
No indication that regular work is avoided by contracting out etc.	SOC-101	<i>The criterion was made applicable to Small units as well. See tables below.</i>

Additional requirements when the operation uses a temporary agency	SOC-102	<i>The criterion was made applicable to Small units as well. See tables below.</i>
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Due to the large number of newly applied criteria for Small units, an additional system for the classification has been created: an asterisk will identify criteria for units using permanent workers (therefore not applicable to small producers without permanent labour).

› Application to Offices

It was requested that a criterion applicable only to sites involved in production / processing should also apply equally to offices.

Theme	Criterion	FFL / FL Response
Staff trained in first aid	SOC-59	<i>This criterion now applies to offices. It has been modified to clarify expectations based on the risks presented by the activity (more expectations if health and safety risks are high than if health and safety risks are low, as is generally the case at an office).</i>

› Level changes

Some participants wanted the level of criteria changed, i.e. the year in which they became mandatory because:

- either they felt that the operations needed more time to prepare to implement them;
- or, on the contrary, they felt these criteria should be made obligatory earlier (criteria identified in purple)

Theme	Criterion	Year Change requested	Answer by FFL / FL
Labour Force: workers free to leave employment after reasonable notice <u>as stated in their contract</u>	SOC-2	KO → MUST Year 2	<ul style="list-style-type: none"> - No level change, criteria stays as KO. - However, since participants noted that some contracts were incomplete in Year 1, we have modified the criterion so that the contract is no longer mentioned.
Communication / information on the right to collective organisation	SOC 6	MUST Year 1 → MUST Year 2	<ul style="list-style-type: none"> - Level changes made
No intimidation of employees informing the certification body	SOC-14	MUST Year 1 → MUST Year 2	<ul style="list-style-type: none"> - Level changes made
Sexual harassment, and associated complaint mechanism	SOC-25 / SOC-26	MUST Year 2 → MUST Year 1	<ul style="list-style-type: none"> - Level changes made - In exchange, the obligation for trained counsellors (outlined in SOC-26) has been deleted. It is now only a recommendation.
Protection during pregnancy	SOC-27	MUST Year 2 → MUST Year 1	<ul style="list-style-type: none"> • Level changes made • In addition, following the recommendations of two participants, specifically women returning from maternity leave (or men returning from parental leave) should return to a job of equal or greater pay.
Health & Safety Risk Analysis	SOC-36	MUST Year 1 → MUST Year 2	<ul style="list-style-type: none"> • Level change not made for Large units, only for Medium units. It was clarified that the level of detail expected will depend on the relative risk level of the activity.

Health & Safety Officer	SOC-42	MUST Year 4 → MUST Year 2 (for Large units)	<ul style="list-style-type: none"> Level changes made In addition, for the Medium units, the following level change has been made: BONUS → MUST Year4
Health & Safety in the Workplace	SOC-43	KO→MUST Year 1	<ul style="list-style-type: none"> Level changes made Moreover, on the advice of a participant, the originally broad criterion was made more specific - now more clearly restricted to machines and equipment.
Voluntary Overtime	SOC-89	MUST Year 2 → MUST Year 1	<ul style="list-style-type: none"> Level changes made

› Other requests for modification / clarification

Theme	Criterion	Request for amendment / clarification	FFL / FL Response
Taking into account other third-party controls	Chapter 3.0	<ol style="list-style-type: none"> Five stakeholders wanted the label <i>BioEntrepriseDurable</i>⁴ be considered and counted at this level A fair trade organisation wanted the FairWild label to be considered here Two stakeholders would like clarification on <i>how</i> the other social controls are accounted for in the standard. 	<p>1 + 2: The standard already addresses on a case-by-case basis specifications related to social and environmental responsibility.</p> <p>3: It was clarified that when a social standard was considered, the criteria were automatically considered compliant (score = 2), unless the operation voluntarily gives conclusive evidence of better performance on one or more criteria.</p>
National Social Regulations	Chapter 3.0	One stakeholder wished to make it clear that if national laws were not respected, score 2 (compliance) could not be granted.	<i>This was made more specific.</i>
Life balance / professional & flexible working conditions <u>for parents</u>	SOC-28	One stakeholder wanted this BONUS criterion to be expanded. One could imagine other mechanisms for such flexibility are included for non- parents (e.g., granting of leave due to business travel, mechanisms for the management of sick family members, breastfeeding & work, etc.).	<i>The SOC-28 criterion was extended to non-parent employees and the examples were expanded.</i>
Deduction from pay as a disciplinary measure	SOC-33	Two stakeholders noted that wage deductions as a disciplinary measure were frequently practised, particularly in some African, Asian or Latin American countries. If this type of measure is not authorized by the standard, operations may be tempted to apply stronger disciplinary measures, ranging from layoff to dismissal. The stakeholders suggested allowing wage deductions as a disciplinary measure under strict conditions (e.g., only for certain types of errors, and only with the	<i>The general rule has been maintained. However, exceptions to this rule and the conditions for their acceptance have been introduced in the standard.</i>

⁴ French Label on CSR. Initiative [SYNABIO](#).

		prior written consent of the worker concerned ⁵).	
Awareness of health and safety risks; Training for high-risk activities; Training on PPE	SOC-38; SOC-39; SOC-45	Two stakeholders considered these criteria redundant, and rather restrictive, especially for small producers (and specifically, the request to register training).	<i>The three criteria have been reformulated and now constitute only two criteria. For Small units, the level is raised to MUST Year 4 (instead of MUST Year 1) and for Medium units, to MUST Year 2 (instead of MUST Year 1). It was pointed out that the trainings:</i> <ul style="list-style-type: none"> - are limited to work with higher risks - Must be done at least once a year.
Lighting, heating, ventilation of buildings	SOC-49	One stakeholder felt that this criterion should more clearly distinguish between Small / Medium and Large units, which do not have the same means. Moreover, the guide seems constraining, and does not take sufficient account of local constraints.	<i>The following changes were made:</i> <ul style="list-style-type: none"> - <i>BONUS Criterion (instead of MUST Year 3) for Small units</i> - <i>Criterion maintained in MUST Year 3 for Medium units</i> - <i>Criterion MUST Year 1 (instead of MUST Year 3) for Large units</i> - <i>The guidance text clarifies that the local context will be considered.</i>
Quality of food	SOC-50	One stakeholder noticed that if food was provided, it was important to check its quality.	<i>A new criterion was introduced for this purpose.</i>
Non-mixed toilets; In an adequate number as defined by law	SOC-51	<ol style="list-style-type: none"> 1) Two stakeholders judged it difficult to apply this to small producers (particularly the requirement to have restrooms designated by sex) 2) One stakeholder wished to have guidance on the required number of toilets if the law does not stipulate. 	<p>1) The following changes were made:</p> <ul style="list-style-type: none"> - <i>Small units: criterion MUST Year 4 (instead of MUST Year 2);</i> - <i>Medium-sized units: criterion maintained in MUST Year 2;</i> - <i>Large Units: criterion MUST Year 1 (instead of MUST Year 2);</i> - <i>The separation of men and women toilets / woman is nuanced and exceptions are possible depending on the size of the unit and cultural or legal contexts).</i> <p><i>The guide states that this applies in all cases of employees working in buildings (offices, processing / packaging, workshops). For employees working in fields, a case-by-case assessment will be made,</i></p>

⁵ As was the case in ancient ESR & FFL standards.

			<p>depending on the means / resources available.</p> <p>2) This was clarified.</p>
Fire protection system	SOC-54	One stakeholder held that this criterion was too restrictive, considering that very few companies can have a system in place from Year 1 ¹ . This stakeholder suggested that it be required only for Large units and for others to be limited to the existence of functional extinguishers.	<p>The criteria and associated guidance text were modified.</p> <p>The criterion continues to apply to Medium-sized units, but only Large units must set up an alarm system and regular exercises.</p>
First Aid kits	SOC-58	One stakeholder felt that this criterion was too restrictive in some contexts.	<p>The criterion has been modified to allow that instructions are not required if a person who knows how to use the kit is present. Natural remedies are accepted if effective.</p>
Contracts with employees	Section 3.7 (SOC-63 to 66, in conjunction with SOC-76)	<ol style="list-style-type: none"> 1) Two stakeholders noted that this section does not take into account the particular case of day laborers which it is very complicated to implement in written agreements. 2) Another pointed out that contracts should include a written clause stating how to end the contract. 3) Another noted that s/he was not clear on the link between SOC-63 - oral contracts - and SOC-64 – written contracts 4) Finally, a stakeholder remarked that in some countries, a system for contracts does not exist. 	<p>These criteria were revised according to the different remarks:</p> <ul style="list-style-type: none"> - Terms of employment are defined orally for ALL workers (MUST Year 1) - Payment of wages is documented for ALL workers (see SOC-76) - PERMANENT WORKERS & TEMPORARY WORKERS working more than 90 consecutive days benefit from a written contract, with defined clauses (Large units: MUST Year 1, Medium units: MUST Year 2, and Small units: BONUS). - Some exceptions are possible depending on the legal context, and the type of worker considered
Decent income	SOC-70	<ol style="list-style-type: none"> 1) Three stakeholders wanted specific references be used for decent income. 2) One stakeholder wanted a clear statement that a decent income should be reached without the employee having to work supplementary hours. 3) One stakeholder remarked, if a study of decent income is not possible, a mechanism for employees and management to reach an agreement on decent wages can be substituted. 	<ol style="list-style-type: none"> 1) This will be treated in a separate guide. 2) This has been clarified. 3) This has been clarified and better framed.
Remuneration of training time / in case of equipment failures	SOC-72	One stakeholder held that this does not apply to day labourers.	<p>It was clarified that this applies to permanent workers and temporary workers working more than 90 consecutive days. It is recommended that operations compensate day labourers for hours not worked if they arrive to work but are unable to carry out their responsibilities (due</p>

			<i>to machinery breakdown, adverse weather conditions, etc.).</i>
Retirement Plan	SOC-77 (& 78)	A stakeholder noted that this aspect should be approached with caution in cases where a pension plan is not provided for by local legislation. Indeed, an employer could make a major effort for the benefit of its employees, but they could very well refuse. This stakeholder suggested mandating an employer to "propose" a pension plan rather than "issue" a pension plan to workers.	<i>This was changed.</i>
Disability insurance / health insurance	79 SOC-81 (associated with SOC-62)	Two stakeholders noted that these requirements should not be required for temporary employees, except in cases where diseases / disabilities were caused by an industrial accident. In these cases, the level of support from the operation should be specified.	<p><i>SOC-79 (disability): The standard continues to apply to both permanent workers and temporary workers.</i></p> <p><i>SOC-81 (Disease): The criterion was divided into two elements:</i></p> <ul style="list-style-type: none"> - <i>MUST Year 4 for permanent workers</i> - <i>BONUS for temporary workers</i> <p><i>Furthermore, it was stated at SOC-62 (on diseases / work-related accidents) that:</i></p> <ul style="list-style-type: none"> - <i>the "expenses" that must be covered include loss of wages during recovery;</i> - <i>the days lost to due to illness / an accident at work cannot be taken from annual leave.</i>
Maternity leave	SOC-80	Two stakeholders noted the following: 1) The rule of 'at least 8 weeks' maternity leave may be less than as imposed by local legislation 2) The question of pay during maternity leave should be specified. 3) Such a guarantee should be provided to temporary workers on a prorated basis. 4) This criterion could cause problems for small operations.	1) <i>This was clarified so that if local rules provide better protection, local rules apply.</i> 2) <i>It was specified that among these eight weeks, six weeks were fully paid for permanent employees.</i> 3) <i>The criterion applies to temporary or part-time employees, on a pro-rated basis.</i> 4) <i>For small operations, the criterion has been reduced to compliance with the legal obligations in this area.</i> 5) <i>In addition, it was specified that maternity leave could not be deducted from sick leave.</i>
Regular hours; Maximum working time;	SOC-87 SOC-90 SOC-91	One stakeholder considered these rules were insufficient when taking into account	<i>Guides SOC-SOC-90 criteria and 91 have been modified to better reflect the seasonality of the business⁷.</i>

⁷ SOC-90: Up to 72 hours of total work per week permitted during periods of peak activity, provided this does not make more of 4 consecutive weeks.
SOC-91: 1 day off every 14 days allowed in exceptional cases, provided that this does not arrive more than 2 times.

Breaks		existing legal frameworks, and seasonal agricultural contexts ⁶ .	
Working on holidays	SOC-92 (associated with SOC-89)	A stakeholder noted that the guide accompanying this criterion was not clear and suggested that when additional hours were done on public holidays, they were not necessarily paid / compensated at a premium rate.	<i>The guide has been clarified, as well as the SOC-89 criteria.</i>
Sick leave / vacation Permanent workers / Temporary	SOC-83 SOC-84 SOC-95 SOC-96	Two stakeholders hoped these criteria would be clarified and harmonized if possible: <ul style="list-style-type: none"> - Clarifying rules with respect to existing national regulations - Minimum number of days for sick leave but not for annual leave 	<p><i>It was stated that:</i></p> <ul style="list-style-type: none"> - MUST Year 1: The national rules / collective agreements must be respected or exceeded for both temporary and permanent workers. <p><i>In addition, for Medium and Large units:</i></p> <ul style="list-style-type: none"> - MUST Year 1: Leave shall be provided for permanent workers even if this is not provided for by national legislation, with a minimum of 5 days of sick leave (already defined) and a minimum of 10 days annual leave. - MUST Year 4: Temporary workers shall have worked more than 3 months in the company in order to be eligible for equal sick leave benefits within a pro-rated system. - BONUS: Temporary workers who have worked more than 3 months in the company shall be eligible for annual leave, on a pro-rated basis.
Differences between permanent and temporary employees	SOC-98	One stakeholder noted that this criterion was too broad and should be restricted to the notion of "equal work, equal pay".	<i>The criterion has been changed; it no longer refers to social benefits, only to wages, working conditions, and health and safety.</i>
Regular work	SOC-101	A stakeholder proposed that this criterion be expanded to ensure that employers do not increase short-term contracts but rather seek to occupy the stable positions by permanent workers.	<i>This criterion has been expanded.</i>

⁶ Current rules state that, unless national regulations or best bid, the following rules must be observed:

- 48-hour normal working week
- 60 hours of work total a week
- A day of rest every 7 days

The exceptions in the case of seasonal activities occasionally possible to overcome both limitations 1st, provided that an average of 8 weeks they are respected and adequate rest days are planned. This should be a specific agreement with the employees.

<p>Temporary employment agency</p>	<p>SOC-102</p>	<p>Two stakeholders argued that the issue of temporary work agencies was treated too permissively and that the criterion is not sufficiently specific:</p> <ul style="list-style-type: none"> - They suggested that temp agencies not be allowed as a regular practice, and only limited to seasonal demand. - Finally, they wished that the way the company supervises the matter internally be specified. <p>Another stakeholder maintained that these requirements were difficult to fulfil from the 1st year.</p>	<p><i>This criterion was separated into two parts:</i></p> <p><i>In MUST Year 1:</i></p> <ul style="list-style-type: none"> - <i>Justification for the use of these agencies</i> - <i>Working conditions (wages, health & safety) similar, and equivalent to job tasks</i> - <i>Clear, detailed agreements with agencies</i> <p><i>In addition, in MUST Year 4:</i></p> <ul style="list-style-type: none"> - <i>The company must not resort to temporary employment agencies, or if so, it must have a supervisory system and effective selection of temporary work agencies. This system was clarified.</i> - <i>There should not be more than 30% of the workforce sub-contracted</i>
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Chapter 4. Respect of the Environment

› General Returns

Twenty-seven parties expressed their views on the different sections of this chapter. Among them we can distinguish:

ESR / FFL or FL certified operations	15
Fair Trade organisations	5
Audit and certification staff	7

One subject was widely debated:

› Organic Certification

Six ESR / FFL-FL certified operations and 3 fair trade organisations did not agree with the lack of obligation to organic certification for the products certified under Fair for Life or For Life.

These stakeholders proposed:

- To make organic certification mandatory:
 - o For all products, following a transition period of several years, of which the duration would be determined depending on the crop (3 fair trade organisations);
 - o For all products, from the outset (3 certified operations);
 - o For all products, from the outset, except for certain complex cultures that can benefit from a transition plan of 3 or 5 years (1 certified operation).
- In all cases, to strengthen control of farming operations which are not certified organic (2 guests and 1 fair trade organisation).

FFL / FL response: The position and the ambitions of the standards were clarified regarding this issue. Conventional operations (i.e. not certified organic) are clearly encouraged to move towards organic certification and to make progress in the management of agrochemicals. Several changes have been made in this direction:

- *A new eligibility criterion, applicable to conventional operations, was added in Chapter 1: ELIGIBILITY: 'Position with regards to Organic Farming';*
- *A separate, specific chapter was created, compiling the complementary applicable requirements for conventional operations for more efficient monitoring;*
- *At the beginning of each cycle (i.e. Every 3 years), a summary of qualitative and quantitative progress will be completed in order to measure the progress made with regards to environmental impact of agrochemicals;*
- *The concept of a "premium" for both organic and fair trade products has been clarified;*

› Level Changes

Some participants expressed hope that the level of criteria (ie. the year when they become mandatory) be amended:

- either because they felt the operations needed more time to prepare and apply the requirement,
- or because of the contrary, they felt that these criteria should be made mandatory earlier (the criteria identified in purple).

Theme	Criterion	Year change requested	FFL / FL Response
Waste management	Section 4.5	Decrease the years of the requirement by a year or two for all criteria of this section.	<i>Following this suggestion, it has been integrated. The size of the units was taken into account.</i>
Overview of the use of water	ENV-07	Year 4 → Year 2	<i>Delays in implementation were reviewed according to the requirements:</i> <ul style="list-style-type: none"> - License to use the water / knowledge on sources of water: Year 2 - Knowledge of the volumes of water: <ul style="list-style-type: none"> o Large units → Year 2 (instead of Year 4); o Medium units → Year 3 (instead of Year 4) o Small units → maintained at Year 4
Overview of electricity consumption and fuel	ENV-09	Year 4 → Year 3	<i>This requirement will be maintained at Year 4.</i>
Wastewater	ENV-14	Year 1 → Year 2	<i>This has been integrated. See also table below.</i>
Dangerous waste	ENV-20	Year 3 → Year 1 or 2	<i>Made applicable in Year 2 instead of Year 3. See also table below.</i>
Pollution of natural water bodies	ENV-15	Year 3 → Year 2	<i>This was applied for Large units. The criteria is maintained at Year 3 for Medium and Small Units. Moreover, it has been modified to better adapt to different contexts.</i>
Support for IPM	ENV-22	Year 3 → Year 2;	<i>This has been integrated. See also table below.</i>
Record of pesticides	ENV-24	Year 3 → Year 2 or 1	<i>This requirement will be modified to applicable in Year 2.</i>
IPM - Insecticides and fungicides	Env-25	Year 3 → Year 1	<i>This was integrated.</i>
Records of inputs used	Env-28	Year 3 → Year 2 or 1	<i>This requirement will be modified to applicable in Year 2.</i>
Planning and history of fertilization	Env-29	Small Unit: Year 1 → Year 2	<i>This was integrated.</i>
Transportation and storage of agrochemicals	Env-35	Small Unit: Year 1 → Year 2	<i>This was integrated.</i>
Identification of plots / re-entry time	Env-42	Year 1 → Year 2	<i>This was integrated.</i>
Diagnostic of Biodiversity & Impact on protected native species	Env-66 & Env-67	Year 1 (Large units) or Year 3 (Small and Medium units) → Year 4 regardless of the size of the unit	<i>Small and Medium units: Year 4 Large units: Year 2 Moreover, the criterion was amended to allow better adaptation to different contexts.</i>

Measures to promote the conservation of biodiversity	Env-72	Year 4 → Year 3	<i>This was integrated.</i>
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› Requests for clarifications / modifications

Theme	Criterion	Request for clarification / modification	FFL / FL Response
Other evidence of environmental compliance accepted	section 4.0	<ol style="list-style-type: none"> 1) Five stakeholders requested that other environmental standards other than those presently listed be accepted. 2) Additionally, one of these stakeholders requested a clarification on the criteria used to determine the acceptance of such standards. 	<ol style="list-style-type: none"> 1) <i>The possibility of recognising other environmental standards upon request on a case-by-case basis was added to this section, 4.0.</i> 2) <i>As in 3.0, it was clarified that once an environmental standard was considered, the applicable criteria would automatically be considered as compliant (score =2) unless the operation voluntarily provides formal evidence of improved performance on one or more criteria.</i>
Reduction plan of synthetic pesticides	ENV-05	A client requested that this criterion reflect a more progressive approach, and that it be connected to the criteria ENV-04 (which states that certain pesticides must be included in a reduction and elimination plan).	<i>The proposed amendments were incorporated into the standard.</i>
Energy management and climate change	section 4.3	A fair trade organisation suggested that this section could address the issue of climate change more broadly, so as not to limit it to that of the use of energy.	<i>The criteria and guidelines were modified in this way (go beyond considerations of energy management), particularly the criteria Env-13.</i>
Wastewater	ENV-14	A stakeholder noted that in some areas there are no adequate solutions for wastewater treatment and constructing a structure takes time. S/he asks to introduce the possibility to implement this requirement through a transition plan.	<i>It was modified to be more progressive and better adapted according to the context.</i>
Waste management system	ENV-18	A certified operation wanted this criterion to develop: <ul style="list-style-type: none"> - by the elimination of the concept of "integrated management" as it is too vague; - by adding the possibility for groups of small producers to put in place these actions through a collective effort. 	<i>This has been clarified and integrated.</i>
Dangerous waste	ENV-20	Two stakeholders noted a lack of contextualization of the criterion as currently presented (limit of 200m considered arbitrary, other measures can be taken to limit the impact on streams, etc.).	<i>The standard has been revised to allow better consideration of the context.</i>

Breeding	Section 4.6 - Sub-part "Farming"	A stakeholder (audit and certification personnel) requested that the application field of this section be clarified: the animals kept by producers for their own needs (not to sell as certified products) are they involved?	<i>This criterion concerns only the products to be certified. This point was clarified in this section.</i>
Support for IPM	ENV-22	A fair trade organisation noted that IPM support may be shared in other ways than by external support, via the sharing and dissemination of good practices within the group.	<i>The guide will be expanded to take into account these aspects.</i>
Planning and historical methods against pests	ENV-23	A certified operation found that this criterion required too much documentation from the smaller producers.	<i>This criterion only applies to producers of Medium to Large size, and an additional year was granted to Medium-sized units.</i>
IPM - Insecticides and fungicides	ENV-25	A certified operation wanted clarification on acceptable proofs to demonstrate that synthetic chemicals are used as a last resort.	<i>Examples have been integrated into the guide column.</i>
IPM - Herbicides	ENV-26	A stakeholder (audit and certification staff) considered that this criterion could be a hindrance, in particular in the area of wine production. The two proposed solutions are: <ul style="list-style-type: none"> - Do not consider this criterion as an impediment to certification in some cases; - Change Year 1 → Year 3, to allow more time for conversion. 	<i>The requirement has been maintained but amended to Year 2. Indeed, there are already foreseeable exceptions.</i>
Soil conservation - appropriate training	ENV-27	One certified operation found that this criterion could be too demanding for the smallest producers, and suggests that it is only mandatory for Large units (it is currently compulsory from Year 3 for all units). As for the ENV-22 criterion, another stakeholder requested the inclusion of internal solutions to the group.	<i>The level of the criteria has been changed:</i> <ul style="list-style-type: none"> - <i>MUST Year 2 for Large units,</i> - <i>MUST Year 3 for Medium units,</i> - <i>MUST Year 4 for Small units.</i> <i>Solutions other than external support may be accepted to highlight the promotion of best practices within the group.</i>
Managing soil fertility	ENV-32	A stakeholder (audit and certification staff) noted that in some sectors, particularly wine production, crop rotation is complex to implement.	<i>The requirement was maintained in the standard because it already allows some contextualisation: crop rotation is not considered the only fertility maintenance measure.</i>
Aerial spraying	ENV-45	A fair trade organisation calls for the removal of any possibility of aerial spraying.	<i>The criterion was reworded to make it clear that only fungicide sprays are accepted and only in very special cases.</i>
Elimination of agrochemical containers	ENV-47	A client wanted this criterion to be clarified: <ul style="list-style-type: none"> - How long may containers be stored? 	<i>Clarifications were made to this effect.</i>

		- What other means of disposal are not allowed when sent to manufacturers or official collection sites?	
Buffer zones	ENV-59	Two stakeholders requested clarification of the definition of "appropriate distance", and what is meant in the guide by "risk analysis".	<i>A non-exhaustive list of items that can be included in the risk analysis has been added to the guide.</i>
Evaluation and monitoring of resources	ENV-62 to 64	A stakeholder suggested to clarify these criteria, to enable a better consideration of the risks.	<i>The criteria were clarified and their implementation can be adapted: simplified approach vs strengthened approach, depending on risks.</i>
Regeneration rate	ENV-65	A stakeholder noted that this criterion is too strict. Sometimes population declines can be observed. If these declines do not immediately threaten populations, adequate collection system can be set up to monitor the development of the population and ultimately to stop the downward trend.	<i>The criterion has been amended accordingly.</i>
Deforestation	ENV-69	View details of the changes requested for the ELIG-2 standard.	<i>See the detailed responses to the ELIG-2 standard.</i>
GMO	ENV-73	A stakeholder recommended clarifying which genetically modified organisms are affected by this prohibiting criteria, including whether new generation GMOs (Synbio, CRISPR) are accepted.	<i>It was clarified that this criterion excludes all GMOs, whatever their origins / or manufacturing methods.</i>
Eco-Packaging Policy & materials prohibited for packaging	ENV-74 & ENV-75	Three stakeholders noted the following: 1) Can certified packaging (e.g. FSC) be considered? 2) Packing limits and requirements are very different depending on the context (sector of activity, regulatory measures, market place, etc.). 3) Do these criteria apply to all operations in the supply chain, even the Producer Operation who is selling his product to intermediaries and not to the final consumer?	<ol style="list-style-type: none"> 1) <i>This will be considered during the control of this point.</i> 2) <i>The consideration of the context was already integrated into the criteria ENV-75 with the possibility for derogations in the case of technical constraints.</i> 3) <i>This criterion is applicable to all operations, except for companies who only buy and resell without control over the packaging. Producer operations are therefore considered in these 2 criteria.</i>
Animal testing	ENV-76	A stakeholder suggested that for clarity, this criterion applies only to the cosmetic sector.	<i>The criterion was restricted to cosmetic products and other eco products (detergents, fragrances).</i>

Chapter 5. Local Development and Community Relations

Three stakeholders provided feedback on this part: 2 certified operations with ESR / FFL, and 1 fair trade organisation.

Theme	Criterion	Change request	Answer FFL / FL
Use of traditional knowledge	LOC-3	A stakeholder considered the criterion LOC-3 lacks clarity and suggested referring to the Nagoya Protocol.	<i>A reference to the Nagoya protocol was added. The Nagoya Protocol is an international agreement signed in 2010 and entered into force in 2014. It is aimed at a fair and equitable sharing of benefits arising from the utilization of genetic resources between communities who hold traditional knowledge, and those who exploit these resources. (see https://www.cbd.int/)</i>
Social Projects	LOC-6 (in conjunction with LOC-7)	This point is a bonus criterion, a stakeholder suggested clarifying that the relevant projects are not those financed by the fair trade premium, but the projects funded by other means.	<i>This clarification was not added because such criteria are related to the local impact of the operation at community level. Operations financing such projects even through the premium should be valorized, because they do create impact in the local social fabric rather than at production level.</i>

› Other modifications

FFL: LOC-1, 2 and 3 now apply to all FFL operations (before, they were applying only to Producer Operations):

- LOC-1: Use right for all resources, including water
- LOC-2 & 3: Linked to biodiversity & technical knowledge. For FFL, only applies to the certified products.

Chapter 6. Supply Chains and Trade Relations

› General Returns

Twenty-seven stakeholders expressed their views on the different sections of this chapter. Among them we can distinguish:

ESR, FFL/FL certified operations	19
Fair Trade organizations	2
Audit and certification personnel	6

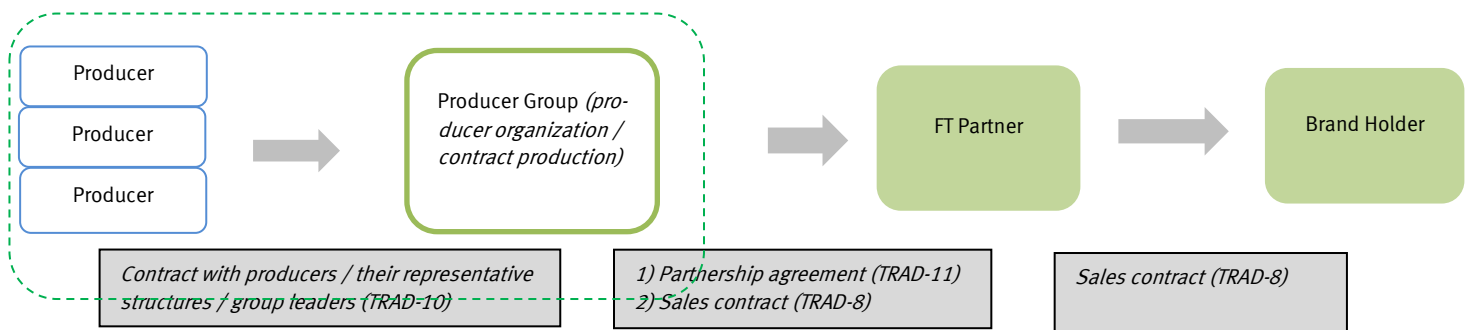
Two specific FFL topics were widely discussed:

› Partnership agreements, long-term relationships within supply chains

Eleven stakeholders commented on the subject of long-term relationships within supply chains, in connection with:

- The long-term commercial relations required between all actors (TRAD-4),
- The Partnership Agreement required between the Fair Trade Partner and the Producer Operations (TRAD-11)
- The sales contract established between fair trade operations (TRAD-8).
- The contracts set up with individual producers (TRAD-10).

Reminder - Diagram of the different types of existing contracts in the sector:



Note: In parallel, TRAD-04 requires that when a commercial relationship ends before 3 years of existence, it is justified.

Multi-annual contracts:

- **3-year contract between the Producer Operation and Fair Trade Partner:** Nine stakeholders wanted that the current recommendation, TRAD-11 -which establishes agreements of three years between the Fair Trade Partner and the Producer Operation- become a requirement. This would allow for a better planning/anticipation/visibility (including financing development projects) for the Producer Operations. Also, 1 fair trade organisation commented that, according to French Law, a requirement of a minimum 3-year agreement is part of the legal requirements to be considered as a Fair Trade relationship.
- **3-year contracts at other levels of the supply chain:** Some stakeholders wanted such agreements of three year minimum contracts also be established between:

- Brandholders and their suppliers / Fair Trade Partners and their buyers – TRAD-08 (4 stakeholders)
- Contract production operations and individual producers – TRAD-10 (a fair trade organisation)
- One stakeholder would like to have the possibility of creating three-party agreements, between the Brandholder, Fair Trade Partner and the Producer Operation in order to guarantee continuity in the relationship with the Producer Operation.

- **On the contrary:**

- One stakeholder thinks that it would be preferable to not require contracts / multi-year relationships in order to be less prescriptive and allow for sufficient flexibility (i.e. changes in suppliers).
- Another stakeholder thinks that even if it is possible and desirable to define 3 year-long partnerships with Producer Operations it is more difficult to implement in reality when there are different types of suppliers, some of which who required greater flexibility.

FFL / FL Response: The criteria have been modified to allow more flexibility, while promoting best practices and ensuring the sustainability of relationships.

› **Between the Producer Operation and the Fair Trade Partner:**

- A multi-year agreement for 3 years OR an agreement of indefinite duration.
- **BONUS:** Minimum / forecasted volumes are defined on a multi-year basis.

If the agreement - whether fixed term or indefinite term- ends before it reaches its 3rd anniversary, this should be duly justified.

Possibility of tripartite agreements Producer Operations / Fair Trade Partners / Brandholders, and exemptions available for agreements directly between Producer Operations - Brandholders.

› **Between the Brandholder and his suppliers / The Fair Trade Partner and his buyers**

BONUS: Partnership agreement established in parallel with the commercial contracts.

If the agreement - whether fixed term or indefinite term- ends before it reaches its 3rd anniversary and this impacts one or several Producer Operations, this should be duly justified.

› **Between the Contract production operation and the producers**

BONUS: Established contracts are contracts for the long-term (multi-year agreement for 3 years or agreement of indefinite duration).

If relations with the contracted producers end before they reach their 3rd anniversary, this should be duly justified.

Provisions of the Partnership Agreement

Two stakeholders wanted certain aspects of the Partnership Agreement clarified, including those relating to the terms of business support and development support.

FFL / FL Response: This was clarified.

› Fair Trade Development Premium

About ten stakeholders submitted feedback about the fair trade premium (TRAD-36 to 38).

North-North

Four stakeholders involved in domestic fair trade production in France (North-North supply chains), considered that the amounts of the fair trade premium, even when lowered (up to 3% of the price paid to the Producer Operation or 5% the price paid to individual producers), were unrealistic and could hinder involvement:

- Two stakeholders (of which one fair trade organisation) requested that the premium is not mandatory in North-North supply chains, that it is instead classified as a 'BONUS'. They think that, in the North-North context, the prices must cover the costs of production and integrate a sufficient margin to allow the producer operation and the producers to be paid and develop their activities.
- Two other stakeholders requested that in these supply chains, the actors decide amongst themselves if/when it is pertinent to finance a common project and at what amount.

One fair trade organisation in America thinks that it is important that the premium is maintained, including in countries like the United States and Canada because it is one of the fundamentals of fair trade.

Another fair trade organisation in France proposes that, in some developed countries which are strongly supported by the public authorities:

- The amount could be lowered to 1% of the purchases made by the Producer Operation,
- The Fair Trade Partner can be more openly included in discussions related to the use of the funds,
- The possibility of a 'price including premium' defined in TRAD-38 could be widened for North-North supply chains (they are currently limited to exceptional cases where the Producer Operation sells directly to distributors/ retailers,
- The possibilities for 'single premium paid to producers' defined in EMP-34 could be widened for North-North supply chains (they are currently limited to exceptional cases where the producers are marginalised/very dispersed).

FFL / FL Response: The premium is maintained in North-North supply chains. However, special arrangements are defined so that, in the context of countries where producers already benefit from substantial social support, the amount of the premium can be reduced.

In addition, the mechanism of "price including premium" have been clarified, with more details on the applicable conditions: only the sales under the Producer Operation's own brand can be invoiced without a clear specification of a separate premium.

The possibility of "single premium paid to producers" has been clarified to allow, under certain conditions, a better consideration of the different contexts where this may be applicable.

Price including premium

Five stakeholders wanted to see that the opportunity given by TRAD-38, "price including premium", is better reflected in:

- The Partnership Agreement (TRAD-11)
- The amounts of the premium (TRAD-38)

A FFL auditor wanted clarification on the following situations:

- Is it possible to combine 'Price including premium' and 'single premium paid to producers'?
- The combination of the system 'Premium used for collective projects' and 'single premium paid to producers' (eg. Premium redistributed individually for a part of the products and used collectively for another part of the products) – is this possible and under what conditions?

FFL / FL Response: This has been clarified.

Taking into account direct technical support

A client and a fair trade organisation requested that direct technical support be an alternative (rather than a complement) to the establishment of a development premium.

FFL / FL Response: Direct technical support put in place by the Fair Trade Partner can be considered in order to decrease the amount of the premium, but not to substitute it entirely. The direct technical support implemented by a Producer Operation (e.g. a Contract Production Company / an Organized Producer Group) offering services to the producers cannot be taken into account to reduce the amount of the premium.

In the absence of a Fair Trade Partner?

Two stakeholders wanted clarification on the consequences if a Producer Operation cannot find a buyer. Can this operation remain certified over several years, even if no premium is paid / managed, and under what conditions⁸?

FFL / FL Response: We have not introduced specific rules in case a Producer Operation does not find a Fair Trade Partner. On the FFL website, a Producer Operation in this situation may be identified, so that potential buyers can contact him.

Clarification on calculation methods

Three stakeholders wanted to see the calculation rules for the development fund clarified:

- 1) The fact that the premium may be applied with different amounts, that is, to the individual producers and to the Producer Operation, complicates the process. Is it possible to simplify the approach?
- 2) How are the justifications made in order to apply a lower amount than 5% of the Producer Operation price / 10% of the producer price? The following concepts should be defined:
 - a. "Products with high added value "
 - b. "Large volumes "
- 3) Is it possible, upon justification, to pay an amount even lower than 3% of the Producer Operation's price / 5% of Producer price?

FFL / FL Response: The rules have been clarified, and, in their formulation, simplified. The possibility to pay less than the 3-5% has been introduced in some particular contexts (see "North-North Fair Trade").

Frequency of Payment

Two stakeholders wanted clarification of the rules related to the frequency of premium payment: would it be acceptable that the premium is paid every 2 years, for example?

FFL / FL Response: A criterion was added to address this issue. The payment of the premium should normally be made once a year. Any lower frequency must be justified, and will be subject to an agreement with the Producer Operation. This agreement and the reasons for this agreement will be specified in the Partnership Agreement.

Other topics were the subject of requests for clarification / changes in this section:

⁸ The 2013 version of FFL repository provided that this is possible only for a period of 3 years. In addition, if the Production operation had not found a partner to pay the premium, he had to finance on its own. Otherwise, the production was redirected to Operation For Life. Page 8 Module 1, CP 10.

› Other Requests

Theme	Criterion	Request for modification / clarification	FFL / FL Response
Selecting suppliers on the basis of social & environmental criteria	TRAD-1	A stakeholder noted that companies cannot select suppliers purely on the basis of ethical criteria. Other factors such as price, quality, etc. are first taken into account. It is often a secondary criterion under which the working conditions and environmental aspects are considered.	<i>The criterion was nuanced to reflect this.</i>
Annual Review	TRAD-6	A stakeholder noted that this criterion could not be filled from the 1st year since it requires that at least one year has passed in order to make a review.	<i>The level of the criterion has been changed: MUST Year 1 → MUST Year 2</i>
Exchange of information / transparency between Fair Trade Partner and Producer Operation	TRAD-07	Four stakeholders commented on this criterion: 1) How would these exchanges of information be shared? Directly between the Fair Trade Partners or via the CB? 2) This type of requirement requires time and personnel to communicate ("more time to summarize and document than to act") 3) Some information can be confidential (i.e. prices, who the end customers are...)	<i>1: This information would be exchanged directly between partners; 2 + 3: The criterion has been nuanced; 1 + 2 + 3: The link was made with the CONS-17 criteria and CONS-18, which mention public information, as opposed to information mentioned here in this exchange, which is B-to-B.</i>
Sales Contracts	TRAD-08	One stakeholder noted that the fair trade premium should be specified in the sales contracts with Producer Operations (and not in other types of sales contracts).	<i>This was clarified.</i>
Contracts with individual producers	TRAD-10	One stakeholder stressed that in some contract farming contexts: - Producers do not wish to have direct contracts; - The existing legal framework interferes with contractual relationships with producers ... And so some flexibility is needed regarding the forms of this "contract" (eg. with parallel agreements annexed to purchase orders, etc.).	<i>Flexibility is already permitted in the standard in which contracts are not signed with individual producers, but with their representative structures / groups of leaders, if any.</i>
Supply Plan / planned volumes	TRAD-12	1) One stakeholder noted that the standard does not specify the consequences and possible adjustments in case of: a. Non compliance in the frequency of purchases presented at the beginning of the year (readjustments possible, etc.); b. Non-compliance with the forecasted volumes. 2) One fair trade organisation noted that established forecasted volumes over three	1) <i>This was stated in connection with TRAD-6, on the annual review of trade relations between the Producer Operation and the Fair Trade Partner.</i> 2) <i>A BONUS criterion was added when quantitative commitments (minimum / projected volumes) were agreed on for a duration of over one year.</i>

		<p>years would be an interesting approach. This would reinforce the criterion TRAD-04 on the long-term relationship and could be implemented:</p> <ol style="list-style-type: none"> At least between the Contract production operation and the individual producers, Between the Producer Operations and the Fair Trade Partners. 	
Related contracts	TRAD-13	<p>One stakeholder noted that it was difficult to commit to increasing the quantities purchased as fair trade. Indeed, it depends on the market demand which is difficult to predict. To buy the same product as fair trade and non-fair trade helps to promote the fair trade quality to new customers.</p>	<p><i>The criterion was changed: if the volumes purchased as fair trade do not increase, the Fair Trade Partner must prove that he still promoted fair trade products to his non-fair trade buyers.</i></p>
Pre-financing granted to the Production Operation	TRAD-15 & 16	<p>Three stakeholders felt that the criteria concerning pre-financing were unclear:</p> <ol style="list-style-type: none"> Does TRAD-15 only apply to ‘small-holder producer organizations’ or is it applicable for any kind of group? This should be clarified. The direct pre-financing from a company/cooperative to the individual producers is not considered. In general, for bookkeeping reasons, pre-financing is especially useful for crops requiring annual purchases of the seeds with harvesting taking place only 1 or 2 times per year. It is not necessarily relevant for crops that are harvested several times a year or those that do not require purchasing seeds. A fair trade organisation thought that this criterion does not go in to enough depth. If Producer Operations need pre-financing, then it could be a challenge for their partners to provide it. This stakeholder suggested approaching financial institutions /organisations to facilitate access to finances without impacting the Fair Trade Partner’s finances. Tripartite agreements could be made. 	<p><i>Two types of Producer Operations have been defined:</i></p> <ul style="list-style-type: none"> - <i>Those for which pre-financing, if required, is mandatory,</i> - <i>Those for which pre-financing, if required, could be refused</i> - <i>Operations are encouraged to develop partnerships with financial institutions,</i> - <i>the terms of pre-financing that need to be contracted have been clarified</i> - <i>The question of pre-financing offered directly to individual producers (if groups) has been clarified, as well as the other ways of financing production</i>
Payment (excluding payment to individual producers)	TRAD-18	<p>This point was the subject of the following remarks:</p> <ol style="list-style-type: none"> Compatibility problems with certain legal obligations (e.g. In France, all suppliers must be paid within 45 days of the end of the month of the invoice). 	<p><i>This criterion has been changed, taking into account the various comments.</i></p>

		2) In order to provide better protection, would it be possible to differentiate between Producer Operations and other types of suppliers?	
Terms of payment to individual producers	TRAD-19	Six stakeholders made the following remarks: 1) The 10-day delay is not applicable in many cooperatives. It was suggested to allow for possible agreements with the producers following a democratic consultation process. 2) It can be complicated to pay within 10 days (due to administrative work, bank payments, etc.). The delay should be extended to 14 days. 3) The delay is not adapted to 'North-North' scenarios. 4) A requirement should be included to pay the entire price to producers in a single payment.	1, 2, 3: A more flexible wording has been introduced: "14 days, unless specified differently and mutually agreed upon". The terms of the mutual agreement are specified. 4: This point has been clarified.
Payment to producers	TRAD-20	A stakeholder noted that it would be useful here to include the notion that woman farmers and producers should be paid directly (not their husband). See section 3.1.3 of the 2013 FFL standard.	<i>This was integrated.</i>
Study of production costs	TRAD-25	1) Three stakeholders had doubts about the feasibility of such a production cost study. 2) Another stakeholder wished to integrate the notion of a minimum margin.	1) <i>The cost study remains a very important component of the FFL approach to sustainable / fair prices. The requirement was maintained. However, the idea that this calculation is part of an approach of continuous improvement was reinforced, with the production costs having to be detailed only from Year 3 onwards. Before, first estimates can be accepted.</i> 2) <i>Recommendations have been added in the guidance section.</i>
Minimum price to producers in the case of producer organisations	TRAD-26	1) For producer organisations, request for more time to implement a minimum price. 2) Request for Clarification: in the case where sales from the group are not 100% fair trade quality, how does one make the retroactive payment for the price differential?	1) <i>Some flexibility was introduced for all Producer Operations, not only producer organisations: before Year 3, floor prices can be based on experience of producers rather than on detailed production cost studies.</i> 2) <i>This has been clarified.</i>
Price differential Fair Trade / market price	TRAD-27 & TRAD-32	A Stakeholder made the following requests: 1) Add a requirement concerning recording annual conventional prices.	1) <i>This was introduced.</i> 2) <i>This was introduced.</i>

		2) Foresee the possibility of derogation for this criterion in the case where market prices are disconnected with real costs of production.	
Distribution of added value within the supply chain	TRAD-General TRAD-35 (in connection with EMP-14; 16; 18; 19)	Two stakeholders considered that the standard did not address the concept of distribution of value-add in sufficient detail within the supply chain. - The question of margins applied along the supply chain is only mentioned briefly (TRAD-35) - One of the founding principles of fair trade is to promote short supply chains so that the price paid by the final consumer is redistributed to producers.	<i>A sub-chapter has been created on this subject, which addresses the issue of margins and short supply chains.</i>
Fair trade relationships between artisan groups and their primary suppliers	TRAD-43	A stakeholder wished for clarification of the term 'Close producers'. Why are producers who are further away not integrated?	<i>This was clarified.</i>

Chapter 7. Empowerment and Capacity Building

› General Returns

Twenty stakeholders gave feedback on this section. Among them we can distinguish:

ESR/ FFL or FL certified operations	13
Fair Trade organisations	3
Audit and certification personnel	4

› Requests for Changes / Clarifications

Theme	Criterion	Change request	FFL / FL response
Strengthening disadvantaged groups	EMP-08	An operation suggested clarifying that this criterion is only applicable if disadvantaged groups are identified among producers.	<i>The clarification "where disadvantaged groups identified among the producers, so [...]" has been added. Otherwise, this criterion is not applicable.</i>
Empowerment of women	EMP-10	An operation wanted clarification of this criterion because the requirement can be difficult to achieve depending on the context.	<i>This criterion has been clarified on the basis of the current FFL standard (3.1.3), and became a BONUS criterion.</i>
Organisational development / Support for the creation of an autonomous	EMP-11	This criterion was discussed by 5 stakeholders: CONS: Some of them considered the criterion too restrictive. It is not a question here of support in terms of representation / struc-	<i>It should be encouraged to have Producer Operations organised in commercially autonomous structures, but it should not be mandatory if the producers do not want it.</i>

<p>commercial structure</p>		<p>ture but more so the development of an independent commercial structure. These stakeholders suggest:</p> <ul style="list-style-type: none"> - to strength the notion that this is applicable "only if the producers would like it to be" - to formulate the criterion differently: Companies should NOT PREVENT the creation of such a structure (rather than SUPPORT its creation) - That this criterion becomes a BONUS. <p>FOR: A stakeholder proposed instead, that it should be more clearly requested to have an evolution- within the systems to production contracts- towards truly autonomous Producer Operations (although some progressivity may be considered).</p>	<p><i>A criterion has been added, as part of the overall FT policy diagnosis, to specify the needs formulated by the producers. Contract Production operations should:</i></p> <ul style="list-style-type: none"> - <i>carry out a study on the types of existing structures / needs and opportunities for organisational strengthening, in consultation with producers (Based on the criterion GOV-27 from ESR standards)</i> - <i>On the basis of this study, determine the type of actions to be taken in terms of organisational strengthening</i>
<p>Market information</p>	<p>EMP-20</p>	<p>A stakeholder suggested making it a mandatory requirement from Year 2 rather than Year 1.</p>	<p><i>This was modified.</i></p>
<p>Fair Trade development plan</p>	<p>EMP-21, 22, 23</p>	<p>1) Some stakeholders were wondering who must finance the implementation of this action plan. They worried about the administrative burden that this represents. 2) A stakeholder suggested making a link between the criterion EMP-21 and the implementation of the ICS.</p>	<p>1) <i>Guidance and tools will be provided to facilitate the implementation of the development plan, in a contextualized approach. The plan must be considered as a tool of continuous improvement.</i> 2) <i>It was clarified that the fair trade action plan could be related to the implementation of the internal control system and support social or environmental improvements on farms (e.g. collective investment for waste management, etc.)</i></p>
<p>Administration and use of the premium / Internal Control System</p>	<p>Chap. 7.5 EMP-34</p>	<p>A fair trade organisation proposed that the Fair Trade premium can be used for the implementation of the ICS (including payment of the staff in charge of the ICS), which can be a costly endeavor.</p>	<p><i>This possibility was introduced but within a framework. If it is clearly identified as a need by the decision-makers responsible for the use of the premium, the premium may be used to fund the ICS:</i></p> <ul style="list-style-type: none"> - <i>For all organisations of small producers, without restrictions;</i> - <i>For other Producer Operations:</i> <ol style="list-style-type: none"> 1) <i>to fund the creation of an ORGANIC ICS within the framework of the transition to organic production, and only for a cycle of 4 years.</i> 2) <i>Upon justification for financing the FAIR TRADE ICS, based on FT diagnosis</i>
<p>Administration and use of the premium</p>	<p>Chap. 7.5</p>	<p>A stakeholder noted that most criteria were applicable in Year 1, some of them in Year 2, however the implementation of projects are sometimes not completed until Year 2 or 3.</p>	<p><i>In this chapter, it is the inspector who determines whether the criteria are applied or not depending on the situation and the information listed in each criterion. These indications were more clearly divided into 3 categories:</i></p>

			<p>1) <i>Criteria once a Fair Trade Partner was identified, and before the premium is USED (for the criteria related to decision-making processes)</i></p> <p>2) <i>Criteria once the premium is PAID (for the criteria related to financial management of the premium)</i></p> <p>3) <i>Criteria once the premium is USED (for the criteria related to monitoring the use of the premium).</i></p> <p><i>All these criteria were made compulsory in Year 1 to clarify that their applicability will depend more on the status of the project rather than the certification year.</i></p>
Decision on the use of the premium – Role of the Fair Trade Partner	EMP-24 - EMP-25	One stakeholder stressed that these criteria do not allow recognition of projects where the main Fair Trade Partner helped the Producer Operations to define the projects. Rather, these criteria limit the intervention of the partner: The Fair Trade Partner has no right of veto, unless the planned measures are not "eligible" according to the framework set by FFL.	<p><i>The rules were redefined to allow that, in the event the stakeholders (Producer Operation – Fair Trade Partner) are in agreement, a process of collegial decision is implemented. More specific rules have been defined to ensure that the decision-making processes remain balanced, with no predominance of one of the parties.</i></p> <p><i>Besides, it has been clarified that the Fund Decision body had to meet at least twice a year.</i></p>
Fair Trade Premium and North-North Fair Trade	The whole chapter	Several stakeholders noted that many rules on the Fair Trade Premium are not adapted to North-North Fair Trade.	<i>Adjustments have been made in connection with ELIG-6 and Pol-8 (which define the target groups / potential beneficiaries) to allow greater universality of these criteria.</i>

› Other modifications

A new criterion was added to enable a better consideration of the cases where multiple fund decision bodies were necessary.

Chapter 8. Traceability, Transparency and Respect of the Consumer

› General Feedback

Ten stakeholders expressed their opinions on the different sections of this chapter. Among them we can distinguish:

ESR/ FFL or FL certified operations	5
Fair Trade organisations	1
Audit and certification personnel	4

Some feedback has focused on the chapter as a whole:

- **FFL:** A certified operation noted the lack of incentives for brandholders to communicate and to promote Fair For Life.

FFL / FL Response: The maximum number of points for CONS-1 criteria, 17 and 18 has been increased.

- **FFL:** A certified operation wanted to add an Annex to clarify, as is done in the current version of the FFL standard, the possible derogations in case of temporary out-of-stock.

FFL / FL Response: A new Annex and associated criteria have been introduced presenting procedures to follow for:

- *Short-term disruptions of supply-chains*
- *Temporary impossibility to ensure physical traceability*

- **FL:** A certified operation thought that this chapter is too focused on ‘product’ aspects (traceability, etc.) even though product certification is a secondary option in the For Life standard. This operation would like to add a criterion related to transparency and respecting the consumer. The consumer should not be misled regarding the responsible values of a company (a sincere commitment).

FFL / FL response: A new criterion was introduced related to the corporate communication of FL operations. Aspects relating to products / For Life supply chains have been separated.

- **FFL / FL:** A stakeholder (audit and certification personnel) suggested to add a criterion that would be applicable in the case of suspension or withdrawal of the certificate.

FFL / FL response: This criterion was added.

› Other Requests

Criterion	Theme	Change request	FFL / FL Response
CONS-1	Marketing and advertising techniques	<p>1) A stakeholder requested a level change: a move from MUST Year 1 to MUST Year 2.</p> <p>2) A second stakeholder requested more clarity on approvals of communications prior to publication: do all communications need to be validated, including those made on social networks?</p>	<p>1) <i>The year has not be modified, in order to cover any communication made as of the 1st year. The applicability will be specified in the criterion (applicable if communication documents exist).</i></p> <p>2) <i>For now, all public communications that make reference to FFL / FL, must be approved in advance.</i></p>
CONS-9	Compliance of subcontractors	A stakeholder questioned the relevance of registering subcontractors with low risks.	<i>Registration enables a control of the operation's capabilities in terms of traceability as well as their respect of fundamental social and environmental aspects. A simplified registration possibility has already been provided to contractors with low risks.</i>
CONS-17	Information on the supply chain - Public Summary	<p>Two certified operations provided feedback on this criterion:</p> <p>The first requested to modify the criterion from MUST Yr2 → Yr 3 (there is a lot of work to do in the first 2 years to structure the use of the premium; the summary should then be secondary).</p> <p>A second request was made for clarification on what is expected in the public summary.</p>	<p><i>The criterion was amended to allow more flexibility in the degree of detail and the implementation modalities of the public summary.</i></p> <p><i>It was clarified that in long supply-chains, this public summary had to be passed on from one buyer to the next.</i></p>

› Other Modifications

For ensuring the traceability of the Fair Trade Premium / Fund, a criterion was introduced at Producer Operation level: Fair Trade sales must be annually reported and updated.

Chapter 9. Managing the certificate and performance

› General Feedback

Four stakeholders provided feedback on this section:

ESR / FFL or FL certified operation	1
Fair Trade organisations	1
Audit and certification personnel	2

› Request for changes / clarifications

Theme	Criterion	Change request	FFL / FL Response
New KO requirement	MAN-General	It was requested that a general KO requirement be added in the case of intentional and repeated misconduct.	<i>This was integrated.</i>
Information to workers & producer on the procedures and results of the audit	MAN-4, 5, 6	<ol style="list-style-type: none"> Two stakeholders requested that the criteria MAN-4, 5 and 6 become applicable in all case, not just for Producer Operations. This would allow for a better protection of workers interviewed during the audit for buyer and manufacturers (confidentiality). One stakeholder wished to understand why, during opening meetings, the workers of Medium-size units do not necessarily need to be present, as is the case for the Large units. 	<ol style="list-style-type: none"> <i>This was integrated.</i> <i>There is no longer a distinction related to the size of the entity; the criterion became a BONUS.</i>
Internal Control System	MAN-11-17	<p>A Fair Trade organisation suggested that, for certified organic farms in France:</p> <ol style="list-style-type: none"> The control for farms is lighter, and focused on a charter or an internal quality approach based on local contexts. The inspection of organic farms by the production operation is not necessarily physical. For example, regular surveys and meetings should be able to meet this criterion. 	<p><i>It was integrated that, provided that the 3 below conditions are met:</i></p> <ul style="list-style-type: none"> <i>Certified Organic</i> <i>Operating in sectors / countries with low social risk</i> <i>Showing a certain level of homogeneity amongst the producers;</i> <p><i>Operations could:</i></p> <ol style="list-style-type: none"> <i>focus their internal control system on Social & Environmental aspects to improve.</i> <i>suggest other methods of control and internal monitoring, including the proposal of an adequate cycle of visits. Larger units (medium & large) must be integrated into the internal inspections.</i>

List of producers	MAN-11	<p>1) A stakeholder would like more progressivity introduced:</p> <ul style="list-style-type: none"> - Year 1: paper list accepted - Year 2: electronic list accepted <p>2) Another stakeholder suggested that this list integrates an estimation of the generated yields.</p>	<p>1) <i>This was integrated.</i></p> <p>2) <i>This is normally integrated in the list of producers certified organic.</i></p>
Overview of social and environmental challenges	MAN-12	<p>Two stakeholder provided the following feedback:</p> <p>1) This criterion seems very strict for small producer organisations. Could it be nuanced (general knowledge rather than description)?</p> <p>2) The guidance could be developed in order to better describe what is expected: critical points on the working conditions and environment.</p>	<p>1) <i>This was integrated.</i></p> <p>2) <i>This was integrated (see also the above comment on MAN-11 to 17).</i></p>
Internal Control System	MAN-13	A stakeholder wanted the exact contents of the internal control system to be described.	<i>This was integrated.</i>

Annexes I and II. Composition and labelling Rules

The labeling rules of the new version of the Fair for Life and For Life standards were a special subject within the consultation questionnaire. The following question was asked:

Which of the two labelling options for FFL products do you prefer among the following two propositions?

A. A single category for labelling with a single logo. For agricultural products with a minimum of 20% fair trade ingredients (at least 10% for cosmetics), the FFL logo can be used anywhere on the packaging with the fair trade % indicated under the logo.*

B. Two labelling categories with two versions of the logo.

- 1) *Products containing at least 80% fair trade ingredients (70% for cosmetics) can be labelled as 'FFL fair trade' with the percentage of fair trade ingredients* indicated under the logo.*
- 2) *Products containing 20 to 80 % of 'fair trade ingredients' (10 to 70 % for cosmetics) can be labelled as 'FFL fair trade ingredients ' with the percentage of fair trade ingredients* indicated next to the logo.*

** In all cases, the fair trade percentage is expressed in relation to the TOTAL of all the ingredients.*

The stakeholders' preference regarding the options did not allow us to select a particular proposal, since the result of the survey was the following:



However, the majority of stakeholders provided comments in their replies and others gave us direct feedback on the matter, thus allowing us to improve our initial proposal.

These comments are categorized by theme in the following table.

Theme	Change request	FFL / FL Response
Mandatory information	The mandatory information (program name, website www.fairforlife.org , etc.) were considered too long by seven stakeholders. Among them, four did not see the added value of having the FFL website displayed on their products. FFL:	<i>Required information has been reduced: the origin of ingredients and the mention of the FFL website are made optional. Mentioning the CB is no longer evoked.</i>

	In particular, three operations raised the difficulty of specifying the geographical origin of certain ingredients, which in some cases may have multiple origins.	
Display percentage of fair trade ingredients under the logo	Concerning the proposal to display the fair trade percentage under the logo , opinions are mixed: <ul style="list-style-type: none"> • Some think, in the interest of transparency, that it is important that this percentage appears under the logo, at least in the case when fair trade content is less than 80% • Others noted that sometimes there are more than three logos on the same product, and if simplicity and clarity are to be maintained, displaying the percentage under the logo becomes very impractical. For this reason, they suggest that this display is optional. 	<i>When % has to be displayed close to the seal, it can be “visually close” and not “under” the seal. See below.</i>
Fair Trade Contents and place of logo on the label	Fifteen percent of the participating stakeholders thought the distinction between products with higher fair trade content and those with a lower content was insufficient. To make this distinction clear to the consumer, eleven participants suggested reserving possible usage of the logo on the front labels only for products composed mainly of fair trade certified ingredients, meaning products having <u>at least</u> 50% of fair content. Four participants argued for higher thresholds (ranging from 70 to 95%) in order to enter the "fair trade product" category.	<i>New rules have been introduced that do not permit the use of the logo on the front label when a product contains less than 50% of fair trade ingredients. 1) “FT” category: Seal can be placed on front label 2) “Made with FT ingredients” category: Seal cannot be placed on front label, unless the % of FT content is $\geq 50\%$ AND all the other certifiable ingredients are not available as FFL certified / recognized ingredients.</i>
"Fair trade Ingredients" Logo	The public consultation did not produce a clear "vote" in favour or against a logo for "fair trade ingredients" (see diagram above). However: <ul style="list-style-type: none"> - Three participants stressed that the proliferation of logos (fair trade vs. fair trade ingredients) was likely to lead to increased consumer confusion. They expressed their interest in the simplicity of a solution with a single logo placed freely with the percentage of fair contents clearly displayed under the logo. - Three other participants have stressed the importance of the presence of the percentage in the case of the logo "Fair Ingredients" but asked that the percentage is on the back of the package. 	<i>The option of using only 1 seal was adopted.</i>
Methods of calculating the fair trade percentage	Several participants hoped that it is not required that the percentage displayed on products is calculated including water (i.e. based on all ingredients), because this calculation penalizes high-capacity producers manufacturing with water, as water simply cannot be certified.	<i>Now the percentage is to be displayed according to the calculation method desired by the operation, provided that it is clearly explained on the label (e.g. "XX% of agricultural ingredients").</i>

<p>Rules of composition for cosmetics</p>	<p>Regarding cosmetics, it was noted that the calculation of percentages based on the "agricultural ingredients," could lead to confusion as to its interpretation (the latter includes agro-ingredients physically processed and also agro-ingredients chemically processed?) For clarity, the proposal was made to perform the calculation from "all the ingredients excluding water and salt."</p>	<p><i>The initial proposal to calculate cosmetic ingredients based on agricultural ingredients included ingredients physically and chemically processed. But, it poses potential interpretation problems when the ingredients are complex. We changed the calculation method applied to cosmetic products to the terms of, "ALL THE INGREDIENTS OTHER THAN WATER, SALT AND MINERALS."</i></p>
<p>Distinguishing FFL and FL</p>	<p>One participant expressed the need to strengthen For Life labelling rules to further differentiate the two programs. S/he suggested that the FL logo should be allowed only on the back of labels, i.e. never on the front label of the product. Another participant stressed that increasing the 20% threshold to 80% of For Life content for the right to use the logo on the product was far too restrictive.</p>	<p><i>The proposed labeling rules for For Life have not changed.</i></p>

Annex III. Communication rules

No feedback was made about this Annex

Annex IV. Procedures for recognition of other programs

› General Feedback

Fourteen stakeholders commented on Annex IV, the recognition of other certification programs. Among them we can distinguish:

ESR/ FFL or FL certified operations	10
Auditing and certification personnel	2
Other	2

› Clarification Requests

FFL: In contracts governing the relationships between a FFL/FL operation and a non-FFL operation who is certified by another CB, current FFL repository contains a clause related to transparency, which include:

- 1) The supplier agrees to inform his buyer in the case his certificate is suspended / withdrawn.
- 2) Partners agree to include fair trade products sold under this agreement in their fair buying/reselling reports, except in the case of restrictions applied by their CB, in which case-specific procedures must be provided⁹.

FFL / FL response: This was clarified.

FFL: One stakeholder requested clarification of the differences between the various recognised programs. Some restrictions are described (e.g., "additional eligibility check" FT USA / "Only production Operations" for SPP). For others, there are no restrictions.

FFL / FL response: These restrictions were removed. However, it was indicated that further controls could be applied in individual cases¹⁰.

FL: A stakeholder asked whether a certificate SA 8000 will also be recognized by the described methods. Another if a certificate Ecosocial IBD may be.

FFL / FL response: Certification SA 8000 does not cover all aspects of the standard For Life, particularly in terms of environment. In contrast, the standard Ecosocial IBD was added to the list of accepted standards for For Life.

› Requests for Changes

⁹ In particular, if one of the following 4 bases was only partly fulfilled by the recognized program:

- The beneficiaries are first and foremost small producers
- There is a fair trade price that covers production costs
- An audit is carried out by a third-party and key Operations are certified

Regarding the **possibility of recognising an ingredient certified by other programs and the associated terms**, the opinions given in the feedback diverge:

- Two stakeholders **were not in favour of such an action to open the standard to accepting ingredients from other schemes**.
They associated it with a devaluing of the proposed standard, with increased risks of traceability control (particularly in the non-certified organic sector). According to them, this opening would lead to inequality and control requirements between sectors, and potentially, to a loss of credibility with consumers.
- Three other stakeholders had a **positive view with reservation**.

To improve the proposal, they suggested clarifying / adding the following:

- In long supply chains, the Fair trade Partner (to be certified) must be distinguished from potential conveyors or traders who do not determine pricing policies;
- The requirement of a commitment of 3 years with the direct supplier certified by another program must be introduced.
- The other five stakeholders commented that the **current conditions are too restrictive and impractical for long supply chains** making this recognition less accessible to downstream purchasers. They highlight the following specific points:
 - **Traceability:** The control imposed on the upstream links (including the Fair Trade partner's Fair For Life audit) will generate significant costs and effort. Operations already invested in another similar certification program will surely find it difficult to consent to another certification;
 - **Transparency:** Information on the upstream of the chain is generally difficult to obtain, in particular concerning information on the fair trade premium.

FFL / FL Response: from the analysis of this feedback, the methods for recognising ingredients certified according to other programs have been revised and simplified:

- *Additional checks on traceability have been limited to the riskiest cases;*
- *Appropriate arrangements have been made to ensure a minimum of transparency, while ensuring a certain confidentiality of the information exchanged.*

However, a general rule has been introduced, for restraining the use of ingredients certified under other programs in case the ingredient for which recognition is requested is ALREADY AVAILABLE in Fair for Life. In such case, the operation will have to justify that:

- *The FFL ingredient is not available in sufficient quality /quantity*
OR
- *The supplier certified under a different scheme is a long-term supplier (i.e. main supplier for this ingredient for at least 3 years)*

Besides, it has been specified that in long / complex supply-chains, the procedure may be strengthened, in the absence of mutual recognition agreement.

Terms and definitions

Two terms have been modified in the “terms and definitions” section:

- “Fair Trade (development) premium” → “Fair Trade Fund”

- Producer Operation: the definition has been adapted, in order to consider in a more adequate way complex situations with a combination of situations.

ANNEX: CODIFICATION OF CRITERIA

	CODE FORMER VERSION (public consultation draft version)	CODE NEW VERSION (final version published)	CRITERIA TITLE
	ELIG-1	Idem	Coherent commitment
	ELIG-2	Idem	Ethics - Company level
	ELIG-3	Idem	Corporate groups a)
	ELIG-4	Idem	Corporate groups b)
	ELIG-5	Idem	Corporate groups c)
	ELIG-6	Idem	Fair Trade target group
	ELIG-7	X	Very large farms a)
	ELIG-8	ELIG-7	Very large farms b)
	ELIG-9	ELIG-8	Very large farms c)
NEW		ELIG-9	Conventional Production
NEW		ELIG-10	Multi-site Entity
NEW		ELIG-11	Sub-groups of producers
NEW		POL-1	CSR Diagnosis
	POL-1	POL-2	CSR Policy
NEW		POL-3	CSR Action Plan
NEW		POL-4	CSR Continuous improvement
	POL-2	POL-5	Discussion with internal stakeholders
	POL-3	POL-6	Internal communication
	POL-4	POL-7	Management changes
	POL-5	POL-8	External communication
	POL-6	POL-9	Promoter of CSR
	POL-7	POL-10	Ethical sourcing policy
NEW		POL-11	Fair Trade Diagnosis - All settings
NEW		POL-12	Fair Trade Diagnosis - Contract production
	POL-8	POL-13	Fair Trade Policy
	POL-9	POL-14	Premium Procedures
MOVED	EMP-21	POL-15	Fair Trade Action Plan
MOVED	EMP-22	POL-16	Impact Assessment
MOVED	EMP-23	POL-17	Continuous improvement
	POL-10	POL-18	Information Internal Stakeholders
	POL-11	POL-19	FT strategic plan
NEW		POL-20	Follow-up of strategic plan
	SOC-1	Idem	Forced Labour a)
	SOC-2	Idem	Forced Labour b)
	SOC-3	Idem	Forced Labour c)
	SOC-4	Idem	Forced Labour d)
	SOC-5	Idem	Forced Labour e)
	SOC-6	Idem	Information
	SOC-7	Idem	Discrimination workers promoting association
	SOC-8	Idem	Disencouraging unionisation
	SOC-9	Idem	Workers organisation allowed
	SOC-10	Idem	Meetings of workers
	SOC-11	Idem	Legal restrictions
	SOC-12	Idem	Grievances procedures - Information
	SOC-13	Idem	Workers grievances respected
	SOC-14	Idem	Workers informing certification body
	SOC-15	Idem	Internal communication
	SOC-16	Idem	Children employed
	SOC-17	Idem	Children of contracted workers
	SOC-18	X	Rehabilitation policy
	SOC-19	SOC-18	Young workers tasks
	SOC-20	SOC-19	Young workers education
	SOC-21	SOC-20	Young workers hours
	SOC-22	SOC-21	Help from child under 12

NEW

SOC-23	SOC-22	Help from child 12-15
SOC-24	SOC-23	Discrimination
SOC-25	SOC-24	Sexual harassment
SOC-26	SOC-25	Sexual harassment - Complaint mechanism
SOC-27	SOC-26	Pregnancy protected
SOC-28	SOC-27	Flexible working conditions
SOC-29	SOC-28	Disadvantaged groups - Especial opportunities
SOC-30	SOC-29	Disadvantaged workers - Improvement working conditions
SOC-31	SOC-30	Harsh or inhuman treatment
SOC-32	SOC-31	Disciplinary practices
SOC-33	SOC-32	Disciplinary practices - Deductions from wages
SOC-34	SOC-33	Strong disciplinary practices exceptional
SOC-35	SOC-34	H&S policy
SOC-36	SOC-35	H&S risk analysis
SOC-37	SOC-36	Risk areas identified
SOC-38	SOC-37	Workers' awareness H&S risks
SOC-39	SOC-38	Specific training for high-risk work
SOC-40	SOC-39	Health monitoring high-risk work
SOC-41	SOC-40	Vulnerable workers
SOC-42	SOC-41	Safety officer / staff
SOC-43	SOC-42	Safe work
SOC-44	SOC-43	PPE - Provision and use
SOC-45	X	PPE - Training
SOC-46	SOC-44	Changing rooms
SOC-47	SOC-45	Washing facilities if toxic substances
SOC-48	SOC-46	Storage chemicals
SOC-49	SOC-47	Light, temperature, ventilation
SOC-50	SOC-48	Access to potable water
SOC-51	SOC-49	Toilet facilities
SOC-52	SOC-50	Facilities food
	SOC-51	Quality of food
SOC-53	SOC-52	Accommodation
SOC-54	SOC-53	Fire protection system
SOC-55	SOC-54	Emergency procedures Large & Medium units
SOC-56	SOC-55	Emergency procedures Small Units
SOC-57	SOC-56	Emergency exits
SOC-58	SOC-57	First aid equipment
SOC-59	SOC-58	First aid staff
SOC-60	SOC-59	Accidents at work
SOC-61	SOC-60	Accidents at work - Records
SOC-62	SOC-61	Accidents at work - Insurance
SOC-63	SOC-62	Terms of employment workers
SOC-64	SOC-63	Contract / agreement
SOC-65	SOC-64	Legal registration of workers
SOC-66	SOC-65	Legal registration of workers
SOC-67	SOC-66	Legal minimum wages permanent workers
SOC-68	SOC-67	Incentives, bonus
SOC-69	SOC-68	Ownership schemes
SOC-70	SOC-69	Living wages
SOC-71	SOC-70	Equity
SOC-72	SOC-71	Remuneration training time
SOC-73	SOC-72	Payment in kind
SOC-74	SOC-73	Fair housing prices
SOC-75	SOC-74	Regular payment
SOC-76	SOC-75	Payment slips
SOC-77	SOC-76	Retirement permanent
SOC-78	SOC-77	Retirement temporary
SOC-79	SOC-78	Disability
SOC-80	SOC-79	Maternity
SOC-81	SOC-80	Medical or Health Insurance
	SOC-81	Health Insurance temporary workers
SOC-82	Idem	Unemployment insurance

NEW

NEW

SOC-83	Idem	Paid sick leave permanent
SOC-84	Idem	Paid sick leave temporary
SOC-85	Idem	Extra social benefits
SOC-86	Idem	Extra support services
SOC-87	Idem	Normal working hours
SOC-88	Idem	Registration working hours
SOC-89	Idem	Voluntary overtime
SOC-90	Idem	Maximum working time
SOC-91	Idem	Rest time
SOC-92	Idem	Working times on holidays
SOC-93	Idem	Night work
SOC-94	Idem	Flexibility in working hours
SOC-95	Idem	Annual paid leave
SOC-96	Idem	Annual paid leave temporary
SOC-97	Idem	Paid leave permanent
SOC-98	Idem	Difference permanent - temporary
SOC-99	Idem	Difference permanent - regular temporary
SOC-100	Idem	Benefits regular temporary workers
SOC-101	Idem	Regular work
SOC-102	Idem	Sub-contracting (1)
	SOC-103	Sub-contracting (2)
SOC-103	SOC-104	Migrant workers
SOC-104	SOC-105	Training by employer

NEW

ENV-7	ENV-1	Overview of water usage	
ENV-8	ENV-2	Water conservation practices	
ENV-9	ENV-3	Overview	
ENV-10	ENV-4	Minimising electricity consumption	
ENV-11	ENV-5	Minimising fuel consumption	
ENV-12	ENV-6	Renewable energy sources	
ENV-13	ENV-7	Further efforts	
ENV-14	ENV-8	Waste water treatment	
ENV-15	ENV-9	Natural water bodies	
ENV-16	ENV-10	Drinking water	
ENV-17	ENV-11	Air pollution	
ENV-18	ENV-12	Waste management system	
ENV-19	ENV-13	Practices	
ENV-20	ENV-14	Hazardous Waste	
ENV-21	ENV-15	Waste disposal	
ENV-66	ENV-16	Biodiversity Diagnosis	
	ENV-17	Overview of threatened species	
ENV-67	ENV-18	Impacts on local protected species	
ENV-68	ENV-19	Use of protected species	
ENV-69	ENV-20	Deforestation	
ENV-70	ENV-21	Other valuable ecosystem conversion / destruction	
ENV-71	ENV-22	Land clearing	
ENV-72	ENV-23	Promotion of biodiversity conservation measures	
ENV-73	ENV-24	GMO	
ENV-74	ENV-25	Eco-friendly Packaging policy	
ENV-75	ENV-26	Prohibited materials in packaging	
MOVED	ENV-1	ENV-27	List of Agrochemicals
MOVED	ENV-2	ENV-28	Legally allowed
MOVED	ENV-3	ENV-29	Category 1
MOVED	ENV-4	ENV-30	Category 2
MOVED	ENV-5	ENV-31	Reduction Plan
MOVED	ENV-6	ENV-32	Follow-up
MOVED	ENV-22	ENV-33	Assistance on IPM
MOVED	ENV-23	ENV-34	Plans and records
MOVED	ENV-24	ENV-35	Record on agrochemicals use
MOVED	ENV-25	ENV-36	IPM - Insecticides and fungicides
MOVED	ENV-26	ENV-37	IPM - Herbicides
MOVED	ENV-27	ENV-38	Adequate training

MOVED	ENV-28	ENV-39	Record on inputs use
MOVED	ENV-29	ENV-40	Plans and records
MOVED	ENV-30	ENV-41	Types of fertilisers
MOVED	ENV-31	ENV-42	Soil conservation
MOVED	ENV-32	ENV-43	Soil fertility management
MOVED	ENV-33	ENV-44	Responsible person
MOVED	ENV-34	ENV-45	Training safe handling
MOVED	ENV-35	ENV-46	Transportation and storage of agrochemicals
MOVED	ENV-36	ENV-47	Agrochemical storage a)
MOVED	ENV-37	ENV-48	Agrochemical storage b)
MOVED	ENV-38	ENV-49	Agrochemical storage c)
MOVED	ENV-39	ENV-50	Agrochemical storage d)
MOVED	ENV-40	ENV-51	Agrochemical storage SE
MOVED	ENV-41	ENV-52	Stock inventory records
MOVED	ENV-42	ENV-53	Labelling of sprayed fields / re-entry times
MOVED	ENV-43	ENV-54	Application methods
MOVED	ENV-44	ENV-55	Rinsing application equipment
MOVED	ENV-45	ENV-56	Aerial spraying
MOVED	ENV-46	ENV-57	Buffer zones
MOVED	ENV-47	ENV-58	Disposal agrochemical containers
MOVED	ENV-48	ENV-59	Water and feed
MOVED	ENV-49	ENV-60	Protection weather conditions
MOVED	ENV-50	ENV-61	Outdoor areas
MOVED	ENV-51	ENV-62	Pain and mutilation
MOVED	ENV-52	ENV-63	Sufficient space
MOVED	ENV-53	ENV-64	Health care and hygiene
MOVED	ENV-54	ENV-65	Antibiotics, Hormones and Amino-Acids
MOVED	ENV-55	ENV-66	No isolation
MOVED	ENV-56	ENV-67	Food Autonomy
MOVED	ENV-57	ENV-68	Reproduction
MOVED	ENV-58	ENV-69	Purchase of animals
MOVED	ENV-59	ENV-70	Buffer Zones
MOVED	ENV-60	ENV-71	Species identification
MOVED	ENV-61	ENV-72	Maps of collection areas
MOVED	ENV-62	ENV-73	Species resource assessment
MOVED	ENV-63	ENV-74	Collection instructions
MOVED	ENV-64	ENV-75	Monitoring system
MOVED	ENV-65	ENV-76	Regeneration rate
MOVED	ENV-76	ENV-77	Animal testing
	LOC-1	Idem	Legal rights
	LOC-2	Idem	Unresolved disputes
	LOC-3	Idem	Use of traditional knowledge
	LOC-4	Idem	Local employment
	LOC-5	Idem	Marginalised groups/areas
	LOC-6	Idem	Social projects
	LOC-7	Idem	Environmental projects
	LOC-8	Idem	Awareness on Social Responsibility
	LOC-9	Idem	Sustainable practices
	TRAD-1	Idem	Suppliers' selection
	TRAD-2	Idem	Monitoring System
	TRAD-3	Idem	Visits and Exchanges
	TRAD-4	Idem	Long-term relation for buyers
NEW		TRAD-5	Long-term relations for PO
	TRAD-8	TRAD-6	FT sales contract
MOVED	TRAD-11	TRAD-7	Partnership framework Agreement (PFA) with PO
NEW		TRAD-8	PFA with other suppliers
	TRAD-12	TRAD-9	Sourcing plans to PO
NEW		TRAD-10	Sourcing plans to other suppliers
MOVED	TRAD-9	TRAD-11	End of relationship
	TRAD-13	TRAD-12	Linked contracts

MOVED NEW	TRAD-10	TRAD-13	Contracts with producers	
		TRAD-14	PFA with Producers	
MOVED MOVED MOVED	TRAD-5	TRAD-16	Direct contact	
	TRAD-6	TRAD-17	Annual review	
	TRAD-7	TRAD-18	Transparency	
NEW NEW	TRAD-14	TRAD-19	Quality problems	
	TRAD-15	TRAD-20	Pre-financing Smallholder Producer Groups	
	TRAD-16	TRAD-21	Pre-financing Other Producer Operations	
		TRAD-22	Written agreement	
		TRAD-23	Interest rates	
	TRAD-17	TRAD-24	Use of Pre-financing	
	NEW NEW		TRAD-25	Pre-financing within PO
			TRAD-26	Other types of financing
	MOVED MOVED	TRAD-18	TRAD-27	Payment terms
		TRAD-19	TRAD-28	Immediate Payment
TRAD-20		TRAD-29	Payment records	
TRAD-21		TRAD-30	Pricing rules	
TRAD-22		TRAD-31	Grading procedures	
TRAD-23		TRAD-32	Deductions	
TRAD-24		TRAD-33	Producer Prices	
TRAD-25		TRAD-34	Production costs	
TRAD-28		TRAD-35	Sales Price	
TRAD-26		TRAD-36	FFL Producer Floor Price	
TRAD-27		TRAD-36	FFL Producer prices	
TRAD-29		TRAD-38	FFL Floor prices agreed	
TRAD-30		TRAD-39	FFL Floor prices level	
TRAD-31		TRAD-40	FFL Sales prices agreed	
TRAD-32		TRAD-41	FFL Sales prices level	
TRAD-33		TRAD-42	Production costs	
TRAD-34		TRAD-43	Open price negotiation	
TRAD-36		TRAD-44	Fair Trade Premium Agreed	
TRAD-37		TRAD-45	Fair Trade Premium Level	
NEW NEW			TRAD-46	Fund invoicing by PO
		TRAD-47	Fund payment by PO	
MOVED NEW	TRAD-38	TRAD-48	FFL premium	
	TRAD-35	TRAD-49	Trade margins	
		TRAD-50	Intermediaries	
MOVED MOVED	TRAD-39	TRAD-51	Overview sourcing	
	TRAD-40	TRAD-52	Type of raw materials	
	TRAD-41	TRAD-53	Commercial supplier	
	TRAD-42	TRAD-54	Local producers	
	TRAD-43	TRAD-55	Primary suppliers	
MOVED MOVED	EMP-1	Idem	Producer Representation a)	
	EMP-2	Idem	Producer Representation b)	
	EMP-3	Idem	Producer Representation c)	
	EMP-4	Idem	Effective representation	
	EMP-5	Idem	Sense of belonging	
	EMP-6	Idem	Equal access	
	EMP-7	Idem	Disadvantaged groups' discrimination	
	EMP-8	Idem	Disadvantaged groups' empowerment	
	EMP-9	Idem	Women's discrimination	
	EMP-10	Idem	Women's empowerment	
	EMP-11	Idem	Commercial Autonomy	
	EMP-12	Idem	Sales to other buyers	
	EMP-13	Idem	Economic management training	
	EMP-16	EMP-14	Special Support Schemes producers	
	EMP-14	EMP-15	Product diversification	
	EMP-15	EMP-16	Ownership Shares	
	EMP-17	EMP-17	Market diversification	
	EMP-18	EMP-18	Direct support	

NEW	EMP-19	EMP-19	Diversification
		EMP-20	Follow-up of direct support from FT Partner
	EMP-20	EMP-21	Information on market
	EMP-24	EMP-22	Functional decision body
	EMP-25	EMP-23	Balance Development Fund decision body
	EMP-26	EMP-24	Resources
	EMP-27	EMP-25	Traceability of Fair Trade premium
	EMP-28	EMP-26	Separate bank account
	EMP-29	EMP-27	Documentation of decisions
	EMP-30	EMP-28	Annual Report
	EMP-31	EMP-29	Communication
	EMP-32	EMP-30	Records of expenses
	EMP-33	EMP-31	Effective use
	EMP-34	EMP-32	Funded projects
NEW		EMP-33	Multiple Fund Decision Bodies
NEW MOVED	CONS-1		Marketing & advertising techniques - Certification
		CONS-2	Marketing & advertising techniques - Corporate Communication
	CONS-2	CONS-3	No commingling
	CONS-3	CONS-4	Traceability
	CONS-4	X	Packaging
	CONS-6	CONS-5	Invoices
		CONS-6	Suspension / Withdrawal
	CONS-7	Idem	Suppliers' conformity a)
	CONS-8	Idem	Suppliers' conformity b)
		CONS-9	Extraordinary disruption a)
		CONS-10	Extraordinary disruption b)
	CONS-9	CONS-11	Subcontractors' conformity a)
	CONS-10	CONS-12	Subcontractors' conformity b)
		CONS-13	Sales Report PO
	CONS-5	CONS-14	Final consumer labels
	CONS-11	CONS-15	Composition sheets
	CONS-12	CONS-16	Composition thresholds
	CONS-13	CONS-17	Key ingredients
	CONS-14	CONS-18	GMO
	CONS-15	CONS-19	Processing aids and additives in food
	CONS-16	CONS-20	Preservatives in Cosmetics
	CONS-17	CONS-21	Information on supply chain
	CONS-18	CONS-22	Information on supply chain
		Idem	Contact person
	MAN-1	Idem	Free Access
	MAN-2	Idem	Activity description
	MAN-3	Idem	Info producers / workers a)
	MAN-4	Idem	Info producers / workers b)
	MAN-5	Idem	Representatives in opening meeting
MAN-6	Idem	Standard knowledge	
MAN-7	Idem	Monitoring non-compliances	
MAN-8	MAN-9	Systemic faults	
MAN-9	MAN-10	Senior Representative	
MAN-10	MAN-11	Workers' representative	
MAN-11	MAN-12	List of registered producers	
MAN-12	MAN-13	Overview social & environmental aspects	
MAN-13	MAN-14	Internal social standard	
MAN-14	MAN-15	ICS a)	
MAN-15	MAN-16	ICS b)	
MAN-16	MAN-17	ICS c)	
MAN-17	MAN-18	ICS d)	