

COMMENTS FAIR FOR LIFE PROGRAMME

1. CONSULTATION DRAFT MAY 2010

and their consideration for Consultation Draft 2, Nov 2010

Comments received from:

Anja Ibkendanz	AI	FFL Team IMO-CH	July 2010
Julia Edmaier	JUE	FFL Team IMO-CH	July 2010
Wolfgang Kathe	WOK	FFL Team IMO-CH	July 2010
Thomais Anastasiades	TA	FFL Team IMO-CH	July 2010
Teresa Blanco TB	TB	Consultant, previously IMO Control Latinoamerica	July 2010
Gero Leson	GL	Dr. Bronner's Magic Soaps	July 2010
Rachel Speth & Joseph Brody	RS&JB	Bambu LLC	April 2010
Rob Hardy	RH	Earth Oil PLantations	August2010
David Bronner	DB	Dr Bronner's Magic Soaps	August 2010
Tom Brown	ToB	Florida Foods	Sep. 2010
Rob Evert	RE	Equal Exchange	July 2010

Consideration of comments text added by Florentine Meinshausen, Nov. 2010

GENERAL COMMENTS AND DEFINITIONS

Topic: Spelling	Comment – Details	Who	Revision Nov 2010
All documents	A thorough spell check is suggested prior to release of 2nd draft. For example, Rain Forest Alliance is spelled in 3 different ways. Also, a thorough edit by a native English speaker is recommended as some provisions are ambiguous.	GL,31.July 2010	done
Capitalization	Only the following words to be capitalized: Fair for Life (FFL) For Life FFL FairTrade Development Premium Premium FairTrade Price – Conventional Price FairTrade Floor Price – FairTrade Sales Price All other words without capitalization.	WOK, July 2010	done
General	Please check that FairTrade is sometimes written as Fairtrade or as Fair trade. Also Far for Life appears sometime as Fair for life and even as fair for life ...Normalization is needed.	TB, 09.07.10	done
Spelling	FairTrade (always capital Trade; one word) or fair trade (only if general, not referring to FFL)	WOK, July 2010	done

	or FLO Fairtrade (if referring to FLO)		
SR & FT in same documents	One of the inconveniences we faced preparing for the audits was the fact that the Social & Fair Trade info was together in one form. For those companies that only want to audit for Social audits, it would be great if the social audit could be a separate form.	RS & JB April 2010	Will be considered when preparing inspection docs
FT Standards Setting	Self explanatory - OK	RH	-
FT Cover, content and definitions	Ditto	RH	-

Topic: Terminology	Comment – Details	Who	Revision Nov 2010
Principles, criteria and performance indicators	The current terminology is not in line with international understanding of these terms. Principles are the overarching topics (2.1 / 2.2 etc.). 2.1.1, 2.1.2 are criteria, and the control points are the 'performance indicators' (compare FW Standard; it would be useful to include the definitions of principles, criteria etc. in the glossary of FFL).	WOK, July 2010	Wording of most principles condensed to confirm better with definition of principles
Environmental Aspects	"Aspects" sounds a bit too general. Better: Environmental Responsibility	WOK, July 2010	done
Endangered Species	As 'endangered' is a defined IUCN threat category, I would delete it unless it refers specifically to this category. For general use, it is better to just say 'threatened' species.	WOK, July 2010	done

Topic: Content – General	Comment – Details	Who	Revision Nov 2010
Divide Programme into two parts	<ol style="list-style-type: none"> 1) Programme (only general text and principles / criteria) (per module) 2) Annex: Performance indicators (per module) – can also be sent to clients (upon request; for self-assessment) Advantage: checklists can easier be changed as they are only annexed.	FFL Team, July 2010	Done – now there is separate complete Fair for Life programme and then control modules
Eligibility criteria	As they are crucial, they should be explained in the general section (module 1) already, not only in modules.	FFL team, July 2010	Now mentioned in module 1 with Annex 1 defined in applicable countries
Environmental Criteria	These should also be explicitly included in module 6 (handlers / buyers).	FFL team, July 2010	done
Rating System	Develop mechanisms to make rating more objective – e.g. provide examples or explanations for all points that can be rated in any control point.	FFL team, July 2010	Done as much as possible
Rating system – not applicable	Not applicable control points should not count for totals	RH	Planned for 2011 as indicated in Module 1

Topic: Content – Definitions	Comment – Details	Who	Revision Nov 2010
Definition Producer	Suggestion to delete 'handicraft artisan' and replace it by 'collector', because artisans are grouped with processor groups in the modules and represent a different form of	WOK, July 2010	done

	production.		
“Protected species”	Add definition	TA, 23.06.2010	done
Cover-content Terms and definitions	It is said: Contract Production – Trader or manufacturer contracting farmers to produce or deliver crops ... I suggest to eliminate the possibility of growers to just deliver some produces, since all produces they deliver should only come from their own production . The actual option might open other unwanted commercial strategies inside the group (which would jeopardize the required traceability in the custody chain).	TB, 06.07.10	Definition will be slightly revised

Implementation FFL, General aspects	Comment – Details	Who	Revision Nov 2010
Note on Inspector Training	Whilst good standards are vital, as are inspection protocols inc. Documents and rigorous certification procedures. I would state that the single most important point is the experience, knowledge, skills and qualifications that an ‘FT’ Inspector has. So called objective analysis and judgements are being made of complex situations in very short spaces of time. This is very difficult for FT alone; yet ‘we’ are then asking for the Inspector to do organic and other schemes too. So – it is critical that more energy’s are put into training and using the right type of training techniques. In my view only the very best inspectors are capable of this work; even good training cannot prepare some Inspectors – it requires social understanding as well as incredibly good social skills to get the right information. In short much more needs to be done in this arena – and certifiers should in some cases be clear that some of their inspectors may actually not be capable of this work. A poor inspector can have a very detrimental effect – especially in a farmer group situation - one that then has to be managed by the ICS going forward – after the inspection. Having said all this – it is clear that new Inspectors have to be given the opportunity to gain experience – but my gauge tells me that the current training is somewhat lacking! And I am probably being kind - hard to believe, I know!	RH	Feedback will be considered for auditor qualification procedures.
Overall programme revision	First, we are philosophically in agreement with the direction that the revisions are going in, creating more rigorous requirements for the various organizations involved in a supply chain	RE	-----

APPLICABILITY AND LABELLING

Module 1	Comment - Details	Who	Revision Nov 10
1.1.1 FFL Objectives	<p>Objective 3: ... "good community relations" sounds very important, very good to me. I strongly suggest that we search for the possibility to link this objective to practical strategies to truly push certified operators to be "fair" with the society they are involved in (<i>in order to avoid the risk to have such an important issue just as a theoretical principle, not duly – not practically implemented, and insufficiently controlled!</i>).</p> <p>A powerful instrument in this direction would be that IMO requests as a MUST that all "big operators" willing to be FL and FFL certified by IMO shall be subject of a public consultation regarding their social role in the community (stakeholders: local and indigenous people, workers, unions etc). (imitate somehow the FSC principle). (<i>This strategy would also give more weight to next objective of "going beyond traditional Fair Trade principles"..., which I feel now is quite "modest" to really make a difference</i>)</p>	TB,	Stakeholder consultation of big operations now included in standard control procedures in Module 1
	Objective 5: Seems a little bit poor? I really don't see it as a "major" objective.	TB,	Still considered objective, wording improved
1.1.1 – 2 1.1.1 - 4	<p>The rating approach is good – but it needs to be sorted out (see my specific comments on each of the criteria in further comments) in terms of current deficiencies and incompleteness. I have commented as requested on these points after each of our FFL inspections – yet I have seen no corrections/amendments. This makes it difficult for your Inspectors to complete correctly and partially undermines the scoring system.</p> <p>Full support that 'FT' is not just a developing world phenomenon. It is important to note that many issues faced by small farmers and producers are very similar in (so called) developed and developing nations. FT should also be a part of generating unity and commonality irrespective of country; this will add strength and a greater level of harmony in finding systemic solutions to systemic problems.</p>	RH	Rating levels added where missing. More guidance on rating and comparison with last years rating planned.
Module 1 Annex 2, FFL seal use	It would be good to indicate in line 2 (perhaps with an asterisk ...) that label statement of FFL FairTrade is not permitted in Austria due to Transfair AT trademark.	WOK,	To be considered in final version
Module 1: table on page 4/5	I find this table redundant and confusing, because all has been said before. I would suggest deleting it.	WOK	done
1.1.2 Scope...	FL option indicates "safe" working conditions, instead of "good" working conditions in the past version. I suggest to keep the wording	TB,	Texts changed anyway. Of

	good, since it is broader than “just safe” (safe is one of the issues for good working conditions).		course working conditions shall be „good“
1.1.2 Scope...	FFL option indicates some SR issues, but not all. I suggest to indicate “Same SR principles as for an FL certification”, before mentioning the FT principles. This will be very helpful for the users in order to always remember that there is no FFL certification possible if there is no SR certification (and avoid the risk that people understands that FFL is “lighter” than FL in the SR aspects).	TB,	Table and wording changed and improved.
1.2 Principles	I think it is very good that we have some principles requesting that operations have an FT Policy (2.5.4 for HL Operation and 3.6.1 for Groups), but: - Handlers are not requested to have an FT Policy. Why? - I also think that we should also ask all kind of operations to have an SR Policy, not only the FT Policy. <i>(in order to internally discuss the SR problems, needs, strategies and perspectives).structure</i>	TB, 27.07.10	Handlers have to have FT sourcing policy – see Module 4 All companies shall have SR policy. Is clearer reflected now as also criteria listed in the programme, not only principles.
1.3 Control (in general)	It is still a very complex / complicated structure of the text, and therefore not easy to read/understand. I got a little bit lost by reading it and therefore I am not able to make any intelligent comment for improvement.	TB, 27.07.10	Control requirement of producers and Chain of custody presented in new form in Module 1
1.3.2.1. A. “Use of Label and References to Certification”	In addition to “other wording” allowance, specifically allow simply the term “FairTrade” “Fair Trade” or “Certified Fair Trade” to precede the primary product descriptor, along with placement of the FFL logo on the label which clarifies IMO is certifying the claim. The stated options are too wordy and most brands are not going to want to clutter up their labels.	DB August 7, 2010	“fair trade certified by IMO” “Permitted now, but only if FFL seal or clear references to FFL on same label
1.3.2.1. B “Use of Label and References to Certification”	Again in the “made with” context, simply and explicitly permit the term “made with Fair Trade /FairTrade / Certified Fair Trade” to precede relevant ingredients, without also “IMO Fair for Life” which can be clarified on the back.	DB August 7, 2010	See comments above and revised requirements proposed in Module 1
1. Table with control requirements (p.14)	Contracted processor: table references requirements under 1.2.2.4 The correct reference is 1.3.2.4	GL,31.July 2010	All texts revised and corrected
1.3.2.3 Requirements for conveyors	Please clarify whether primary importers (under EU organic rules) who merely serve to clear and transport goods that are organic / FT certified but do not repackage or directly pay the producer are subject to annual audits. Furthermore, in developing countries, the export from an export project may initially be conducted by a licensed exporter who does not handle the product but merely lends his	GL,31.July 2010	Contracted traders count as contracted handler – see section in Module 1 and Module 4 on “Intermediate or contracted handling operations”.

	<p>name or may be involved in minor functions, such as loading.</p> <p>The audit of such operations that do not handle money or premium and who have minimal labour involved in the process should be limited to the compliance with local labour laws and, if necessary, the documentation of the flow of goods.</p>		
Module 1, page 17, 1.3.2.4	Confusing description. And why is there such a huge difference on the point if the product is sold or the processing step is sub-contracted?	AI, 29.07.2010	Considered in new control chapters for chain of custody operations. Same basic requirements for contracted and intermediate traders
Module 1, page 19, 1.4.2	Confusing with 2 tables on page 14 and page 20. It should be only one table once!	AI, 29.07.2010	Done. Module 1 entirely re-organised
Module 1, Annex 2, Food composition rules	Full label use, option 2: at least 50% - but efforts to reach 90% - why 90%, if option 1 is now 80% are enough?	AI, 29.07.2010	Error corrected. 80% is proposed labelling target threshold.
Module 1, Annex 3 Cosmetic Rules	Including water FT ingredients at least 10% * - no explanation of the * .	AI, 29.07.2010	Corrected.

Annex 1	Comment - Details	Who	Revision Nov. 2010
Annex 1 - Recognition	<p>This is fine – other FT certifiers need some real pressure to have mutual recognition to other FT certifiers – they may not ‘see it now’ but it will ultimately hurt them; because it hurts the development and growth of FT generically and limits product which limits the number of producers and processors to ‘come into FT schemes’ and not be marginalised any longer. Competiveness is one thing, selfishness is another; this is for grown-ups - human beings and their livelihoods and being given the opportunity for a fair chance and for human decency. It is for FT certifiers and their schemes to also ‘look at themselves’ and ask if they are being fair? How can companies such as Earthoil and others put pressure on other FT certifiers to sort this disgraceful situation out? Perhaps someone needs to go public on this?</p>	RH	No corrections needed
Not sure where to put	<p>To provide flexibility to a given FFL brand that calls out FFL ingredients on their products, that in a situation where due to order runs on products or otherwise disruptions of inventory, where the FFL material cannot be supplied in a timely fashion to prevent out of stocks, that non-FL material may be pulled from a another source, but the difference in price between the non-FT and FT material, times 10%, must be paid into</p>	DB August 7, 2010	See slightly revised guidance texts in new Annex 3 & 4 Composition rules

	the primary FFL producer FT fund. This thus puts a financial penalty and disincentive on FT material supply disruptions, while also giving flexibility in emergencies to FFL brand holders.		
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Annex 2 Composition Food	Comment - Details	Who	Revision Nov. 2010
Annex 2 'A' bullet point 3	Under composition requirements 'A' bullet point 3 – temporary exception to blend a small % - this % would be much better if it is specified e.g. a minimum, as should a timeline on the market. To simply state when 'the market of certified FT products is sufficiently developed is too 'lose'. It risks IMO being inconsistent with Operators in implementing a standard and possible accusations of IMO favouring one operator over another. It therefore runs the real risk internally that FLO and its LI's have run into – different interpretations of the same standard as a result of it being implemented in differing ways – this needs careful consideration as it runs the other risk of empirical data being inconsistent and therefore limited in helping develop schemes further. This comment - ditto for 'B' bullet point 2.	RH	Considered in slight revision of composition requirements – see new Module 1, Annex 3
Module 1, Annex 2, A	Composition requirements: Please resolve the contradiction between 80% requirement and 90% target requirement in second bullet item.	GL,31.July 2010	Corrected. Expected level of inclusion is 80%
Module 1, Annexes 2 and 3	B. Product made with....: The requirement that "each ingredient available in certified FairTrade quality should come entirely from certified FairTrade origin" seems to eliminate the long-term justification for the category "made with FT ingredients" since in both cases the ultimate FT content would be 90%+ as most ingredients become available in FTC quality. Yet, Section 1.3.2.1 (Module 1) does not state as an objective the long-term elimination of the category "made with". There should be a clearer rationale for maintaining the category "made with".	GL,31.July 2010	This requirement was misunderstood. It means that if a certainly commodity, e.g. cocoa butter is used FT, then it is expected that all cocoa butter is FT – but there is clearer guidance now on blending
Not sure where to put	To provide flexibility to a given FFL brand that calls out FFL ingredients on their products, that in a situation where due to order runs on products or otherwise disruptions of inventory, where the FFL material cannot be supplied in a timely fashion to prevent out of stocks, that non-FL material may be pulled from a another source, but the difference in price between the non-FT and FT material, times 10%, must be paid into the primary FFL producer FT fund. This thus puts a financial penalty and disincentive on FT material supply disruptions, while also giving flexibility in emergencies to FFL brand holders.	DB August 7, 2010	Revised requirements on blending. Bu the proposed system seems complicated to implement and may lead to wrong incentives for FT suppliers because they continue to get FT premium although not selling.

<p>Labelling rules food</p>	<p>There is no reference to “dry matter” so apparently common food regulations apply. I would assume that a percent juice claim on the panel coupled with Fair for Life, Fair trade would be permitted as long as there is compliance with the composition requirements.</p> <p>I would be happy to provide input knowing this is a policy issue. In general, I believe we should be able to claim the plant and resulting juice content on the label as Fair trade on the label copy.</p>	<p>ToB</p>	<p>This refers to LAoe juice. In food, as indicated, composition requirements refer to weight without added water. Therefore FT laoe juice from concentrate.</p>
<p>Module 1, Annex 2, Part A.</p>	<p>--We are confused as to the connection between the first two bullet points (“80% of all...” and then “At the very least...”). These seem to be two paths on something that should be either/or.</p> <p>--While we totally appreciate establishing a bar of (for example) 80% of agricultural products being FFL certified, there would be cases such as in our milk chocolate bars and our hot cocoa mix where we have organic milk powder that comes from cooperatives but those coops are in the US and Europe so not currently eligible, and thus the FFL-eligible ingredients would be less than 80%</p>	<p>RE</p>	<p>Wording of composition requirements improved for clarity. 80% are target, 50% is minimum. For products like milk chocolate adapted target levels and times can be agreed- But once FFL certified milk powder would get available this should be used – as also products like milk are Fairtrade certifiably under Fair for Life.</p>

<p>Annex 3 Composition Cosmetics</p>	<p>Comment - Details</p>	<p>Who</p>	<p>Revision Nov 2010</p>
<p>Annex 3</p>	<p>Section A 70% should be the bar, which should be high. At least 50% - unfortunately this is where manufacturers will ‘pitch’; therefore if IMO really want it to be 70% then either don’t make the 50% ‘allowance’ or restrict the 50% to a specified time period after which they must conform. This second route to 70% would require a much higher degree of management and therefore resource on IMO.</p> <p>Section B is OK at a lower % of 10%. However as with section C labelling will need to be monitored closely and IMO will need to be very strict; otherwise there could be problems. The point is ‘how closely’ does the public look at labels – folk see the mark ‘fairtrade’ and they will think the whole product – I mean the product has the logo on it and we know where %’s are with FLO and LI’s. Temporary exceptions and any other –</p>	<p>RH</p>	<p>Labelling rules for cosmetics strongly revised. 50% excluding all water based FT ingredients is now considered a sufficiently high minimum bar, even long term. There is a different option for labelling water based FT products like gels or fair rinses with FT juices.</p>

	<p>exceptions need to be well thought through with certification criteria drafted – if not then inconsistencies will creep then rush in; with the real possibility of undermining the whole FFL scheme – not just on cosmetics either.</p> <p>Section C – care again on any labelling/wording on packages – however its a category that is important because it allows operators to make a start – this is crucial.</p>		
For cosmetics	<p>Follow up on my separate cosmetic comments: to prevent a situation where FFL seal products show up in the market that contain only 10% FFL aloe vera, and none of the major cleansing or moisturizing ingredients of a lotion or bodywash are otherwise FT, NO WATER should be allowed to contribute to FFL % content even if its from the aloe plant, unless the product is just aloe vera. Not just limited to water in extracts, reconstituted concentrates, etc.</p>	DB August 7, 2010	New composition rules address this concern and prevent “fair washing”.
Cosmetics rules	<p>Under Cosmetic, Composition point 2, I would remove (e.g reconstituted aloe vera) and add after weight unless defined on the attached reconstitution list. If included in the attached list and if extended as directed the panel should comply with “Fair for Life” seal use and label restrictions. For plant waters.....</p> <p>That attached list should provide a label guideline by plant, by part and definition. In my view permitted items should be common food/ingredients and contain only compounds native to the plant. Juice is probably the most common value add to plants and is a common food ingredient permitted in Cosmetics.</p> <p>Definition: Aloe barbadensis Miller leaves are grown by Fair Trade growers and the leaves are juiced to yield aloe barbadensis miller leaf juice. This juice is extracted and is a common food ingredient provided as 1x juice, liquid concentrates and powders. The industry recognized 1x value of the extended juice for aloe barbadensis miller leaf juice is 0.5 % solids. No solvents or artificial components are added in the process. Only 100 % aloe containing no preservative, synthetic ingredients or materials foreign to the aloe plant are permitted.</p> <p>Product: Aloe barbadensis leaf Juice (aka. aloe vera gel in Trade) Plant: Aloe Barbadensis Miller Plant Part: Leaf Reconstituted solids content: 0.5 % solids</p>	ToB	<p>Aloe is now calculated as wet weight in the like other fruit juices and fruit gels if products contain 90% FT certified ingredients. This is in analogy of organic cosmetic labelling rules.</p> <p>But the other option with minimum 50% threshold explicitly counts only non-water based content, i.e. only oils or nut butters, essentially oils, etc. and the dry content in aloe products. This shall prevent “fair washing” of products by adding e.g. 50% aloe into a product as replacement of water.</p>
Cosmetics rules	<p>I have not studied but I do want to clarify the FT aloe portion explaining “dry matter”</p> <p>The aloe powder is a 200x powder. If the</p>	ToB	See comments above

	<p>user uses .49% powder in is his formula the aloe barbadensis miller leaf juice of the formulation would be 98% juice. We have disclosed the quantity of leaves purchased from farmers by virtue of the IMO audit. Does not appear fair to the farmer that it be calculated on a “dry matter”</p> <p>It appears (based on the document restrictions) this will make it nearly impossible to claim Fair Trade on cosmetics using aloe vera gel, Aloe Con UP 200 Code 83 and 84.</p>		
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MODULE 2: HIRED LABOUR OPERATIONS

1.1 CORE LABOUR RIGHTS

Module 2 Core Labour Rights	Comment - Details	Who	Revision Nov 2010
Module 2. Presentation of Standard Structure ...	Working tools for us to measure continuous improvement that we claim under objective 2? Since we still have the “one year qualification column” in the standard, I suppose we will still work only with the yearly increased % of fulfilled control points. (I tough we could adopt the 4 columns of UTZ of FLO in order to be clearer?) I see that a “2=M from year 2” was introduced in this new version...	TB, 27.07.10	No changes. Some M-requirements become Minimum only after 2 or 3 years. But otherwise yes – increased percentage.
Module 2: List of performance indicators	“Control point” or “Performance indicators”? (in the general explanation it is said that following the criteria there is a list of <u>Performance indicators</u> , but in the Standard they still appear with the name “Control points”. I suggest to normalise this wording.	TB, 27.07.10	No changes. In explanation in each module they are introduced as performance indicators (control points). The tables are used for control – therefore „control points“ useful table header.
Module 2: Rating of performance indicators ... M=MUST	Following sentence seems not to be correct: “If a requirement is MUST after 2 or 3 years of certification, progress towards meeting the requirement must be demonstrated”. -In our 1 column system, a requirement has a MUST level or not, independently of the certification year(s). Please check if redaction is OK.	TB, 27.07.10	No changes. Some M are only M in year 2 or 3. If a yr 3 requirement not met in year 1- then progress in this criterion required for yr 2 – and thus a condition for improvement may be imposed to remind operator of upcoming M.
Module 2 rating system		RH	Missing ratings added and errors

<p>Principle 2.1.4 Principle 2.2.1 Principle 2.2.5 2.1.2</p> <p>2.1.2 No. 4</p> <p> No. 5 No. 9 No. 10</p> <p>2.1.5 No. 2 No. 3 No. 4 No. 6 No. 7 & 8</p> <p>2.1.6 No.5 No. 6 & 10 No. 15</p> <p>2.2.1 No. 1 No. 5 & 6 No. 9</p> <p>2.2.3No.3,4,8,11,17</p> <p>2.2.3 No. 15 & 16 2.2.4 No. 1 & 5 No. 7</p>	<p>There is an error in the wording – needs correcting;</p> <p>Ditto;</p> <p>The detail of this is very important;</p> <p>If a criteria in NA – either a score cannot be given or that it should score maximum – why? If the score is NA, then the total score applicable to the operator should be reduced by this amount and made clear, or simply score maximum; in this way the % score is the same. If scores are being published on IMO's WS they should reflect accurately the findings.</p> <p>There is no phrase to score a 4, which is available in the score column;</p> <p>Ditto;</p> <p>Ditto for score of 3;</p> <p>Ditto for score of 4;</p> <p>Ditto;</p> <p>Ditto;</p> <p>Ditto;</p> <p>Score to max of 4?</p> <p>Score ratings need to have accompanying phrases</p> <p>No phrase for score of 3;</p> <p>Ditto for score of 4;</p> <p>Ditto for score of 3;</p> <p>No phrase for score of 4;</p> <p>Phrases required for score ratings 1-4;</p> <p>A controversial point – but a relevant one;</p> <p>These points refer to temporary workers – question are the benefits apportioned proportional to the time worked; it would be helpful to make the position on temporary workers clearer.</p> <p>Need phrases for appropriate score;</p> <p>Need phrase for score of 4;</p> <p>Whilst on the one hand this scoring would seem to make sense – however giving a high score of 3 for no night, Sundays or public holiday working might actually be very unfair. Provided wages are paid correctly at premium rates and hrs of work are compliant; then denying higher wages for those who of their own volition wish to do this work at premium rates are being denied an extra source of income. If like me you have worked on a farm; then you will know being given the opportunity to earn substantially more during harvest periods, combining at night – grain dryer work etc. was a real and important extra. I do however agree that care has to be taken for people to work sensible hours and extra limited to peak seasons. Another important aspect, a facility running 24/7 is indicative of using capital to best affect, night</p>	<p>corrected.</p>
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<p>No. 14</p> <p>No. 16 No. 18</p> <p>2.3.2 No. 3</p> <p>No.4, 5 & 6 No. 7</p> <p>2.3.3 & 2.3.4</p> <p>2.4.1 No. 1 & 4 No. 5</p> <p>2.4.2 No. 1 No. 5</p> <p>2.4.4 No. 2</p> <p>2.5.3 No. 5</p> <p>2.5.4 No. 6</p> <p>2.5.5 No. 1</p> <p>No. 4</p> <p>No. 7</p>	<p>working, holiday working etc facilitates this efficiency – so again provided the work is carried out safely, within prescribed hours conditions and correct premium pay or time off in lieu etc. then such practice is absolutely fine and should not be disadvantaged by this scoring. This needs more work and changing.</p> <p>As with previous comment for temp workers, does this mean statutory holidays given proportionally as to the amount of time the temp worker works – this area on temp workers needs thinking through more? No phrases for 1- 4; No phrase for score of 4;</p> <p>The score of 4 – has the phrase ‘perceived as model’ – two things – taking other people’s word that this might be the case (who will you ask? How will you avoid bias – good or bad?) and use of the word ‘perceived’ should be changed to a more concrete expression. Need phrases appropriate for scores 0 – 4; There is no category for score 1, distinction between score of 3 to 4 is not clear enough; Good important sections;</p> <p>No phrase for score of 4; If NA should be 4 not 3;</p> <p>No phrase for score of 4; Need phrases for scores 0 – 4;</p> <p>No phrase for score of 4;</p> <p>Need a phrase for each of 0 – 3 scores;</p> <p>There is a criteria (phrase) for 4 – but only a maximum score of 3; There is criteria (phrase) for score of 3 – but max score only 2; There is a criteria (phrase) for score of 3, but a max score of 4; There is a criteria (phrase) to 3, but only a max score of 2;</p>	<p>02.09.10</p>	
<p>Rating of (4) if only permanent workers</p>	<p>This is not realistic and not fair to many operations that HAVE to rely on temporary labour. Rating if only permanent labour as 2 n.a.</p>	<p>FFL Team, July 2010</p>	<p>Changed in most CP. Planned that n.a. control point will not count for totals. So there will be no more indication “if n.a. then ...”</p>
<p>Too few minimum</p>	<p>Suggested minimum indicators: 3.6.4, CP1;</p>	<p>FFL Team,</p>	<p>More control</p>

criteria for producers, with regard to accountable trade relations to buyers, e.g. Section 3.6.4	CP3; CP5.	July 2010	points introduced to act as accountable trade partner
Module 2 2.1.2 Freedom ...	6 new Control points were added, and all of them seem very interesting. But, in a general way, I am afraid that such improvements might make the system somehow too "heavy" (old system was already quite heavy-detailed, now it goes more in detail-in heaviness...)	TB, 27.07.10	The FFL team thinks the addition helps auditor to remain alert of these different aspects to check when assessing freedom of association.
Module 2. Principles (2.1.4)	It says: ... and to do violate human rights" Should be: ... and do not /don't violate? (also mentioned in the same way in chapter 1)	TB, 27.07.10	Corrected.
2.1.4	Delete "to" insert "not" so its "...and do not violate human rights."	DB August 7, 2010	Corrected.
Legal registration of workers (2.1 Conditions of employment; 2.2.1)	Should be included again as it is in the current version. In order to be able to certify devoted organisations, mechanisms should be elaborated that allow certification if there is proof of the operator's concept to 1) provide work to marginalised people who are already in the country (e.g. refugees) and 2) strives for legal registration of workers wherever possible.	FFL Team, July 2010	Done as suggested. Control point added again, new guidance text.
2.1.5 CP3	There is no real difference between Rating 1 and 2. Both say "no indication of systematic discrimination".	JUE, Aug. 2010	Rating levels re-worded.
2.1.5	Note: Positive discrimination has the real possibility to create further discrimination – positive discrimination should have cautionary qualifiers/guidance notes.	RH	Guidance text changed slightly in consideration of this and other comments on "positive discrimination"
2.1.6	Workers that carry out activities identified as being dangerous or a health risk in the occupational health and safety programme, or those that require special skills such as the handling and application of agrochemicals, carrying heavy loads or using agricultural machinery or equipment are eligible to an annual medical examination paid by the operation. Workers must have access to the examination results and must be assigned to other activities if the recommendations indicate that they are unfit for the current position.	TA; 28.07.2010	New control point added
2.1.6, CP3, Fire Drills	Wouldn't once a year be enough, unless otherwise regulated by the legislation?	WOK, July 2010	Changed as proposed
2.1.6, CP5, Emergency exits	Add: 'Emergency exit doors are never locked from inside and can be opened easily by any person'.	WOK, July 2010	Changed as proposed
Nursing mothers,	Include 'no handling of toxic chemicals'. CP6:	FFL team,	Changed as

2.1.6, CP15, also CP6	2=M – no handling of agrochemicals by pregnant / nursing mothers.	July 2010	proposed
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1.2 EMPLOYMENT CONDITIONS

Module 2 Employment conditions	Comment - Details	Who	Revision Nov 2010
2.2.1, legal registration of workers	I am against deleting “legal registration of workers” just to cope with the US small farmers interest group. If you do this, you can also ease the child work requirement – just they don’t have such an influential pressure group.	AI, 29.07.2010	Previous control point added again. New additional guidance text.
2.2.1 No. 9	A controversial point – but a relevant one	RH	No changes
2.2.2 wages, CP 5	Individual bonus payments can be dangerous as they may contribute to competition and can be highly unfair. Suggestion to remove this additional CP.	FFL Team, July 2010	added that must be distributed according transparent system
2.2.2, wages, CP 7 and 8	Confusing differentiation between M=1 and M=2; we have no clear view on this – either M=2 should be from year 1 or no M at all, because the definition is vague and a lot depends on individual judgement of the auditor (very difficult to assess).	AI, FFL team, July 2010	Improved wording in CP 7 and 8.
2.2.2 Wages	Great! I think it is very good that you enhanced the criteria on this principle and include the living wage concept (and not to stay just with legal wage, which is normally far too low in poor countries!). And it goes together with some new control points that were missing. I completely agree.	TB, 27.07.10	No changes
2.2.3 3No.3,4,8,11,17	These points refer to temporary workers – question are the benefits apportioned proportional to the time worked; it would be helpful to make the position on temporary workers clearer.	GL	Wording in CP and guidance texts revised accordingly.
2.2.3, general	To give 4 points if only permanent workers: Why that? Many processing operations work only during certain periods of the year.	AI, WOK, 29.07.2010	Will no longer apply once not applicable CPs do not count. Good practice to have as little temporary workers and provide regular employment.
2.2.3, social benefits introduction	Sentence: ‘if governmental accepted’: A sentence should be added that in such a case cross-verification with local NGOs, trade unions etc. will be required.	FFL team, July 2010	Added as proposed.
2.2.4, working hours and paid leave, intro, para 3	Better ‘maximum of 12 weeks’, as six weeks are in reality often too short.	FFL team, July 2010	Changed as proposed
2.2.4, working hours and paid	Compulsory overtime should be better defined, i.e. only compulsory if the company	FFL team, July 2010	Improved guidance texts

leave, intro, para 4	defines exactly for what type of work and under what conditions and in which periods.		
2.2.4, working hours and paid leave, intro, para 5	Sunday: expand to 'other national free days' (can be Saturday in Israel; Friday in many Arab countries). In the same para: 'time-compensated or paid ...'.	FFL team, July 2010	Not yet changed, but will be considered for final revision
Working hours	Working hours for smaller producer groups or rural based producer groups are hard to manage and monitor and vary depending on the type of work, season or weather.	RS&JB	No changes. These requirements do not apply to rural producers in groups.
2.2.4 Working hours	<p>General concern: my first-hand experience with processing projects suggests that young projects which involve much manual labour are routinely struggling to strike a balance between the demand to process often-perishable raw materials on non-optimized equipment in a given period of time while trying to comply with working hour regulations which, in some countries are not reflective of reality in agricultural settings (high supply of raw materials and long working hours during peak season, usually accepted by temporary workers as a source of income). This conflict between operational needs and legal or FFL working hour regulations may prompt processors to consider the use of machines, rather than employing people, even though working conditions and pay in their operations are superior in the local setting, the work is needed by the local population and humans can economically compete with machines w/o excessively raising cost of production. FFL regulations and rating practice should avoid creating incentives to replace humans by machines that are driven by a conflict between operational requirements and sometimes unrealistic local working hour laws. In evaluating such labour situations the inspector and certifier must try to understand the nature of work and on-site presence of various categories of workers, rather than just rely on documentation of working hours when evaluating compliance with local labour laws or FFL requirements.</p> <p>In some settings where workers receive piece wages the presence at the work site does not necessarily constitute "work" but socializing. While it may not be feasible to add allowances for such time to the maximum allowed number of working hours it should be considered during inspection.</p> <p>There is also not sufficient recognition of the fact that unannounced absenteeism is common in village settings. As a result, processors who handle perishable goods are sometimes forced to ask workers present on site to work longer hours. Thus, it will often be fair to calculate effective weekly working hours as a monthly average, when comparing</p>	GL,31.July 2010	Considered in revised guidance texts.

	<p>them to legal or IMO standards.</p> <p>In spelling out FFL requirements and in assessing a specific situation enough flexibility should be given for operations to average working hours during peak periods over a month and allowing for a certain amount of non-productive time during presence at the work place.</p>		
2.2.4 No. 1 & 5 No. 7	<p>Whilst on the one hand this scoring would seem to make sense – however giving a high score of 3 for no night, Sundays or public holiday working might actually be very unfair. Provided wages are paid correctly at premium rates and hrs of work are compliant; then denying higher wages for those who of their own volition wish to do this work at premium rates are being denied an extra source of income. If like me you have worked on a farm; then you will know being given the opportunity to earn substantially more during harvest periods, combining at night – grain dryer work etc. was a real and important extra. I do however agree that care has to be taken for people to work sensible hours and extra limited to peak seasons. Another important aspect, a facility running 24/7 is indicative of using capital to best affect, night working, holiday working etc facilitates this efficiency – so again provided the work is carried out safely, within prescribed hours conditions and correct premium pay or time off in lieu etc. then such practice is absolutely fine and should not be disadvantaged by this scoring. This needs more work and changing.</p>	RH	<p>Considered. No more higher scores for less working hours</p>
2.2.4 - 14	<p>As with previous comment for temp workers, does this mean statutory holidays given proportionally as to the amount of time the temp worker works – this area on temp workers needs thinking through more?</p>	RH	<p>Not yet changed. general guidance for auditors is that for temporary workers benefits, working hours always in proportion to their employment</p>
12-2.2.5	<p>Never understood why it is not allowed to have substantial differences in social security and payment conditions for permanent and temporary workers. I don't consider it per se unfair that not same social benefits are paid and that salaries are lower for temporary work.</p>	AI, 29.07.2010	<p>Slight changes. Long term temporary workers shall have similar conditions as permanent workers</p>
2.2.5	<p>In regards to different types of manufacturing operations. For a small producer group that utilizes part full time employees but also uses collective/cooperatives. For example a master craftsman and his team work at the production facility as contract manufacturers, not as employees and negotiate their own fees. How</p>	RS&JB	<p>No changes. This section is not applicable for producer groups or groups of craftsmen</p>

	to grant all workers the same rights and benefits?		
2.2.5	Equal Treatment of different labour types – the question here is similar for previous on Temp workers – this needs to be calculated on a proportional basis? But seriously – how to do this is a challenge – it needs much more work to make this ‘work’ it is a too simple analysis of a common working situation.	RH	Requirements in this sections have been slightly adapted and reflect SASA project recommendation. But may need further revision.

1.3 SOCIAL RESPONSIBILITY

2.3 Social Responsibility	Comment - Details	Who	Revision Nov 2010
Section 2.3.1 (also relevant for section 3)	The management planning can be quite overwhelming as a process for many operations. For this reason we suggest that this should have more the character of recommendations for structurally already quite developed companies. Wording of control points could be less complex and less technical.	FFL team, July 2010	Done. Simplified criteria and guidance texts
2.3.2 CP3	This might be hard to find out during the tense time frame of an inspection. Most inspectors will just rate this CP on basis of their personal feeling, which might not be representative.	JUE, Aug 2010	Guidance on rating levels added
2.3.2 CP 3	The score of 4 – has the phrase ‘perceived as model’ – two things – taking other people’s word that this might be the case (who will you ask? How will you avoid bias – good or bad?) and use of the word ‘perceived’ should be changed to a more concrete expression.	RH	Wording changed.
12-2.3.4 Animal Rights, Explanatory text footnote 4	If there is not a general definition of protected species the restriction should also include species listed in CITES Annex I and species listed in CITES Annexes II and III should be trafficked according to the CITES regulations.	TA, WOK 23.06.2010	Changed as proposed

1.4 ENVIRONMENTAL RESPONSIBILITY

2.3 Environmental Responsibility	Comment - Details	Who	Revision Nov 2010
2.4.1, CP 2	Should be a MUST. It is generally very important to reduce water use. Although in many regions of the world water resources are getting scarce water saving methods are not very popular. Certified operations should give an example.	TA; 28.07.2010	M from year 3
2.4.1	Add: “Waste traps in processing plants prevent the discharge of solids into water bodies and municipal waste water canals.”	TA; 28.07.2010	Added that organic and inorganic solids shall not be discharged
2.4.1	Add: “For all water exploitation respective	TA;	added

	concessions and permits from the relevant authorities must be present.”	28.07.2010	
2.4.1	Operation does not deposit any organic or inorganic solids into natural water bodies.	TA; 28.07.2010	added
2.4.2, CP 2, 3	Should be MUST. Globally the trend is focused on using less electricity and energy in general.	TA; 28.07.2010	Changed: 2=M from Year 3
2.4.3	Add a CP: “The operation does not process species or parts of species which are on CITES, IUCN Red List or national/regional red lists.	TA; 28.07.2010	added
2.4.3, introductory text (b), CP 4	How can we audit an operation which destroys natural habitats during the certification process? Compensation is not always enough. The time frame before application for FFL during which no destruction has taken place should be long enough not to allow an operation to destroy, wait for a given time frame and then apply.	TA; 28.07.2010	Changed requirements with regard to clearing natural forests
3.4.3	Add CP: No degradation or destruction of primary forests or old growth secondary forests after 1997 even if areas designated as agricultural land.	TA; 28.07.2010	Changed: Production on land 10 years prior to application
2.4.4, CP 3	Should be a MUST	TA; 28.07.2010	Changed: M from year 3 onwards
2.4.4	Add: “No disposal of organic or inorganic waste in the surrounding landscape.	TA; 28.07.2010	Added in guidance text
2.4.4	Add: “The final or semi-final waste deposit areas on the land of an operation must have been identified and designed in a way that is technically suitable for the final deposit or processing of both organic and inorganic waste through an evaluation of site characteristics, the volume and type of waste to be eliminated or treated and potential impacts.	TA; 28.07.2010	Considered in revised guidance texts
2.4.4	Add: “Waste should not be transferred to persons or businesses without first checking that its treatment or final use complies with legal requirements and the requirements of this programme.”	TA; 28.07.2010	Considered in revised guidance texts

1.5 FAIRTRADE CRITERIA

2.5 Fairtrade	Comment - Details	Who	Revision Nov 2010
12-2.5.2	Suggest to put an M for 2 nd or 3 rd year on trustful relations to buyers. There should be a control on the producer site as well because we have several clients where the buyers would like to stick to long term relationships but the producers just seek the highest price each year.	AI, 29.07.2010	Added control points on being long term trade partner
p. 30, third paragraph	Reference to footnote is missing, resp. is on page 22.	JUE, Aug. 2010	corrected

2.5.4	<p>FFL should not specify price finding mechanisms or criteria for trades between a producer company, and a buyer in a developed country. Particularly, defining a “stable floor price” for exported products is not feasible where cost of production is highly dependent on the price paid by the processor to its supplying producers. Furthermore, processing companies may make sales to expand their market, often times with a very small or no profit margin. FFL inspectors and certifiers are not in a good position to assess the merits of such action. The intention of guaranteeing a processing/exporting company a fair price is laudable but it does not address market realities that may dictate that such a company fails.</p> <p>It does not appear fair to the producer to be rated under FFL for its failure to always fetch a profitable price – as long as the prices paid to farmers and wages paid to workers meet FFL standards.</p>	GL,31.July 2010	No changes, see next comment by David Bronner.
2.5.4	<p>This is my comment to Gero re his comment, and he indicated he pretty much agreed with me:</p> <p>“I’m not sure I agree with this, and in what instance have you ever sold coconut or palm oil at a price under the floor, except to us for a time where we treated the additional amounts of money we sent as a “loan” until scalability was reached, but then subsequently forgave when we realized that this was not proper and appropriate in a fair trade context. Given that we corrected this retroactively, why would you not want to have a floor price requirement? I think the terms of fair trade are that Serendipol can’t go around offering low initial pricing to attract customers and then charge higher... it should just be fair.</p>	DB August 7, 2010	No changes.

2 MODULE 3: PRODUCER GROUPS

2.1 CORE LABOUR RIGHTS

Topic: Content – Module 3	Comment – Details	Who	Comment Incorporated Oct. 2010
3.1.1 No. 3 No. 4 3.1.1.1 No’s. 1 to 4 inc. & 3.1.1.2 No’s 1 to 9	<p>Don’t need to use word ‘quota’ just ‘written system for purchases’ as may not use a quota system but something else;</p> <p>Specify phrase for 0 to 4 scores, to assist with consistency from one inspection and Inspector to another;</p> <p>An organisational structure for a group does not have to take on ‘general assembly’ type of affair – however the must be correct farmer representation into the group’s decision making and representation should be</p>	RH	<p>Done</p> <p>done</p> <p>Agreed. More guidance text provided in this section.</p>

	democratic; using 'Union Type' terminology can be off-putting for some; it is not value free.		
3.1.1.2 No.2/3	<p>Where a private sector company (buying only or processing) contracts with farmers and initiates and supports the formation of farmers groups and facilitates communication between and education of farmers, the processor <u>cannot be held responsible</u> or possibly lose certification (M=2) if growers are not interested enough to run a constitutionally democratic structure. It must be up to the farmers to decide whether such a structure is warranted or desired, not the processor.</p> <p>FFL should also recognise that that the Western method of selecting representatives by majority vote is often not used in developing countries. Delegation e.g. of officers (treasurer, speaker, president etc.) by acclamation is rather common and has its weaknesses – but so does majority vote. FFL should consider this either in its regulations or the certification assessment of a situation.</p>	GL,31.July 2010	In present wording company does not lose certification in first 2 years as long as they can demonstrate efforts to support set up of such an organisation. From year 3 onwards at the very least a development plan must be presented how at least some kind of working farmers representation can be initiated. Agree that democratic election is not common in many countries, added more guidance text in this section
3.1.1.2 No.2/3	<p>This is my comment to Gero's comment, and he's onboard with this approach:</p> <p>I think that it is good for FFL to have this requirement, and if as in our case, growers are not motivated by low price and geographic proximity to form groups, that we can still incentivize and insist on them in regards to administering their share of the fair trade premium, and when they come together to do that, they can also formally delegate tasks to Serindipol that they don't want to handle as a grower group anyway. Then we have the best of both worlds... I wouldn't want to give enemies of FFL easy ammunition that we don't need to give them, and as we discussed this is the work around. We're not insisting grower groups form to do stuff we know they won't do, or even bother meeting in the first place to do; just with the premium which they are motivated to do.</p>	DB August 7, 2010	
3.1.2/2	Payment within 8 days after delivery – is that realistic with the 8 days as M?	AI, 29.07.2010	Extended to 2 weeks.
3.1.2	Advance payments to producers (well anyone actually, as the world has seen over the last two years!!) is not always a good thing; in fact it can have a negative impact. Firstly, not all producers need advances for their crop inputs; in EO India and Kenya provision is made for inputs such as compost – they in effect become advances negating the need for cash. So the first thing is to check whether there is a need and to what degree the need is. Therefore simply scoring high for advance is ill conceived in isolation. Secondly and arguably worse is that an advance payment may in fact make it worse for the producer,	RH	There is an additional CP on help in farm budget planning. We still believe the option to get prepayments in certain cases is valuable for producers, esp. in case of short harvest (and income) seasons only once a year.

	<p>who at harvest (or at some point) have to pay back the advance. This means less money to last until the next harvest – thereby potentially pressing for an earlier advance – it becomes a downward spiral. At EO Kenya I have noticed that a request for advances actually indicates a strong need for some basic training on budgeting for the farm and household; advances also indicate the need for emergency funds (potentially a use for social/ft funds) and for crop insurance. I also believe that whilst the group mechanism should from time to time make financial provision; it is not a bank. Nevertheless, the company can facilitate important things, for example EO in India and Kenya has set up bank accounts for farmers; in Kenya we are using M Pesa – this enables all farmers to now be paid directly on their mobile phones. This is not only empowering as they have accounts and provided they manage their accounts sensibly will gain credit over time. It also saves much time and is empowering; as they no longer have to “queue for <u>their</u> money” at the bank. An advance in some ways is dis-empowering!</p> <p>No 2: Why assume a high score should be given for ‘free inputs’ – look, whichever way it is ‘dressed up’ someone or some organisation has to pay for the inputs. Use of the word ‘free’ is incorrect. If a high score is given if the company make provision of inputs without cash charges then it should state this – but not ‘free’ – FT is not charity and this notion should be dispelled. FT is about making the consumer aware that they should pay a fair price that covers cost plus a profit from goods that have been produced in a decent and fair manner. In EO’s case inputs are actually paid for from a proportion of the FT fund’ so the farmer pays; these are farmers with small businesses – so it is right that they should pay; it is also empowering that they should pay. Charity is a double edged sword it helps yet it creates dependence if not administered very carefully!</p> <p>Comments ditto as for 2 & 6</p>		<p>Wording of level 4 rating slightly adjusted.</p> <p>Setting up bank accounts for producers now also counts as good practice (level 3)</p> <p>Free or subsidised inputs effectively give the producer a higher income. If there are subsidised of free inputs in addition to the assessed fair price (that often is based on local market prices and not entirely on costs of production) we do believe this should count in favour the group operation that invests extra money for producers through this.</p>
3.1.3	5- No phrase for score of 4;	RH	

	7&8: Need phrases for scores 0 – 4 – needed for clarity and consistency; general comment TNP's should be explicit for each point throughout the document not just as totals.		
3.1.4, Principle Text	I would replace “Internal Management System” with “Internal Control System”; otherwise, it could be confusing for the reader if we use all these different wordings. Especially as there is also the Management System as a new requirement, which is something completely different.	JUE, Aug. 2010	Internal management system is the new term proposed and used by ISEAL as it reflects better that in fact the classic group ICS is more a management system than just a control tool alone. But since entire text and this section are really only about ICS – I corrected it to ICS.
3.2.1	2- No phrase for 3 but score for 3 is there; 5 -No phrase for score of 4; 6 -No phrase for score of 1; 8 -No phrase for score of 3;	RH	corrected
3.2.2 No. 1,2 & 3	No phrase for score of 1;	RH	There is only rating 0 or 2 expected here, if auditor thinks rating 1 is more adequate a detailed comment must be provided
No. 5	1M – Not ‘really’ dangerous infers that there is still ‘dangerous, or perhaps even ‘very’ dangerous – perhaps better to say dangerous?		Done
No. 6	Scoring moves from 2 (adequate) to 3 (very advanced) in one ‘jump’ would be better 2 (adequate) 3 (good) 4 (advanced);		Done
No. 7	Need a category for 3;		
No. 8	No phrase for score of 3;		
No. 10	Need score of 3 – i.e. ‘good protection’;		
No. 17	This needs re-writing – does not make sense;		
No. 18	2 should be an M;		
NO. 19	No phrase for score of 4;		
			Sine working conditions and working hours on producer farms are in fact hard to monitor, we decided not to

			make it an M. but level 0 is not accepted - so if overtime is not paid extra they must correct the situation to renew certification.
3.3.1 No. 1, 2, 3 &4 No.5 No. 6 & 7 No. 8 No. 9 No. 12, 13, 14, 15	No phrases for scores of 1; No phrase for score of 4; No phrase for score of 1; No phrase for score of 4; There is no phrase for score of 4 – however the phrase for a score of 3 is too high (should be for 4) with something phrased between 2 and 4 for 3: By the way – there can never be 'no risk; needs to say 'very low risk'; No phrases for scores of 1;	RH	corrected
3.3.2 principle B	Question – Whilst it is critical that minimum national legislation on minimum wages are adhered to – I ask myself this (and I am probably about to make things more difficult by asking!) should this not be in line with the principle of 'covering living requirements plus a discretionary spend in a 'fair wage'. If legislation and the implementation thereof worked to ensure minimums met this 'principle' then presumably this is good and lowers the need for FT certification. That is clearly NOT the case. For example, do current minimums cover education for children? I doubt it in many countries, however is this a living cost/ non discretionary part of income; I would state an emphatic yes. If we are not raising the bar on these things then what's the point? It might be helpful to have some clear guidance notes as to what is meant by a fair income/wage?	RH	So far not explicitly listed as requirement as this section only applies to very small group operations with less than 50 workers, or 20 permanent workers. Any bigger processing site etc would need to be audited against full HL requirements. In our experience such small group operations may find it really difficult to provide living wages if beyond minimum wages (that are often already challenge) and a major social focus in most groups is still on producers who not always earn a living wage income from their sales either.
3.3.2 No. 8 No. 9	No phrase for score of 1; No score of 4 – use of word free is 'best' not used (see previous comments) It would be		Done Wording slightly

<p>No. 11</p> <p>No. 12, 13, 15 & 16</p>	<p>better to denote that should a 4 be given that it is part of workers package of benefits; which is good hence '4' – but not free;</p> <p>See previous comments on overtime as not necessarily been viewed as a negative; in fact as a positive too given the correct controls and payments;</p> <p>No phrase for scores of 1;</p>		<p>adjusted</p> <p>Working hours CO now MAX = 3 only.</p>
<p>3.4.2</p>	<p>To high expectations; it is already great if the group do good premium projects, why expect them to engage even beyond that, how should they have the time, money and capacities to do all these things? Besides, "preserving local traditions": local traditions are not necessarily "nice" and can be against main principles of the standard.</p> <p>Suggest to keep only CP 6, and 5 as "additional voluntary".</p>	<p>AI, 29.07.2010</p>	<p>done</p>
<p>3.4.2, a, Text in italics, Line 2</p>	<p>Local traditions are not always positive. Therefore we suggest including '... preserving local traditions, unless they are not in line with international social standards or the provisions of this programme.'</p>	<p>FFL team, July 2010</p>	<p>done</p>
<p>3.5.2, CP 10</p>	<p>Should be a MUST</p>	<p>TA; 28.07.2010</p>	<p>Done, from yr 3.</p>
<p>3.5.2</p>	<p>The farm is allowed to breed wild animals in captivity when the farm has the required conditions and the permits stipulated by law. These activities must be supervised by a competent professional.</p>	<p>TA; 28.07.2010</p>	
<p>3.5.2</p>	<p>Farms that reintroduce wildlife into natural habitats must have the appropriate permit from the relevant authorities and comply with the conditions established by law or reintroduce the animals via duly authorised and established programmes. A competent professional must advise the farm on the release practices. Exotic wildlife must not be introduced into the farm.</p>	<p>TA; 28.07.2010</p>	<p>Seems so irrelevant for all normal producer farms in groups that I would not include it as explicit control point. If this is a problem it would constitute a negative impact on surrounding habitats and be mentioned under CP 4</p>
<p>3.5.2</p>	<p>The producers do not use crop protection products:</p> <ul style="list-style-type: none"> - within 5 m from any water stream or body up to 3 m wide (including seasonal streams and creeks) - within 10 m from any water stream or body over 3 m wide (e.g. rivers and lakes) - within 15 m from springs <p>In case local legislation is stricter, national laws apply.</p>	<p>TA; 28.07.2010</p>	<p>This is covered in integrated production criteria (Module 8 – 2.3. – CP5) and regulated by all GAP standards except organic. Therefore I don't see why it should be explicitly</p>

			mentioned here?
3.5.2	Add CP: Annual assessment of the risk of phytosanitary, chemical or physical pollution or contamination of irrigation water courses.	TA; 28.07.2010	I cannot see why this would be realistic and necessary for being a fairtrade organisation.
3.5.2	Add CP: Risk assessment of nurseries: land use, irrigation, agrochemicals, GMOs, use of peat, soil fertility and erosion.		Nursery are part of the certified unit normally, if seedlings are bought in from external nurseries then this is covered under all GAP requirements.
3.5.2, CP 5, 6	Add: (2) Clearing of land only after environmental risk assessment and with the assistance of an environmental expert. Compensation payments are made	TA; 28.07.2010	This is really tricky and strong for individual small scale producers in our typical producer countries, many of which do clear local bushland for production, but not forest land. We permit this even in organic, why not in FFL? And who would do an environmental risk assessment for each producer? Maybe permission by the group?
3.5.2	Add CP: Crop production only up to 30 m from water courses. If it cannot be avoided to go nearer to the water course then a strip of natural vegetation is left to avoid soil erosion. Strips of natural vegetation are left around the fields as biotopes and corridors between biotopes.	TA; 28.07.2010	See comment above on same subject.
3.5.2	Add CP: No degradation or destruction of primary forests or old growth secondary forests after 1997 even if areas designated as agricultural land.	TA; 28.07.2010	Proposed to make the cut 10 years previous to certification and no destruction as M requirement from the ginning of certification onwards.
3.5.2	Production in or in the vicinity of protected areas is according to the zoning of the protected area and producers are in close contact with the protected area authority.	TA; 28.07.2010	Not proposed for individual small scale producers in a group.

<p>3.5.3 No. 1, 2, 3, 4 & 5 No. 6</p> <p>No. 7 No. 9</p> <p>No. 10, 11 & 12</p>	<p>No phrases for scores of 1;</p> <p>Phrase for each score 0 -4 needed for consistency between inspections and Inspectors (not perfection but this does help);</p> <p>No phrase for score of 4;</p> <p>General comment – Anything NA for example should receive a maximum score otherwise it reduces the score for no reason – that is it prevents a 100% ever being possible. The alternative is to make the scores into % - so a score including NA's as max scores or as lesser scores provided the total is reduced proportionately for any reduced score as NA – quite frankly do the % and NA as a top score would be simpler and quicker. In any case if scores are to be published (and whilst a small point) then a score should accurately reflect the position – currently it does not.</p> <p>No phrases for scores of 1</p>		<p>Done</p> <p>Done</p> <p>This proposal will be further discussed internally (how easily it can be implemented) and possibly be implemented in the final rating system</p>
<p>3.5.3, CP 11</p>	<p>Add plant and fungi species and specify the listing of the species: CITES, IUCN Red List, national/regional red lists.</p> <p>Add following restrictions for the permission of hunting, collecting such species:</p> <ul style="list-style-type: none"> - the activities do not involve species in danger of or threatened with extinction - There are established laws that recognise the rights of these groups to hunt or collect wildlife. - Hunting and collection activities do not have negative impacts on the ecological processes or functions important for agricultural and local ecosystem sustainability <p>These activities are not for commercial purposes.</p>	<p>TA; 28.07.2010</p>	<p>Specification added, plant parts and lichens not listed, this applies for wild collection (separate module) and if the group would really as such collect and sell these products outside FFL certification it would violate performance indicator 7 (no substantial negative impact on threatened species etc.)</p>
<p>3.5.3</p>	<p>Add CP: No degradation or destruction of primary forests or old growth secondary forests after 1997 even if areas designated as agricultural land.</p>	<p>TA; 28.07.2010</p>	<p>Not done for smallholders</p>
<p>3.5.3</p>	<p>Production in or in the vicinity of protected areas is according to the zoning of the protected area and producers are in close contact with the protected area authority.</p>	<p>TA; 28.07.2010</p>	<p>Not done for smallholders</p>
<p>3.5</p>	<p>Same consideration as 2.4.3: How can we audit an operation which destroys natural habitats during the certification process? Compensation is not always enough. The time frame before application for FFL during which no destruction has taken place should be long enough not to allow an operation to destroy, wait for a given time frame and then apply.</p>	<p>TA; 28.07.2010</p>	<p>Very hard to control for every single producer in a large group. If a systematic problem in the group it would violate CP 3.5.2-5 – but I made that one a MUST</p>

			and added that compensatory measures are only accepted for bush and grass land.
3.6.1 No. 1 & 3 No. 4 No. 5 No. 6	No phrase for score of 1: No scores for 0 & 1? There has to be a market imperative to grow crops – otherwise the farmer – falls back to product orientation rather than market orientation – the scoring therefore makes no sense – what is clear is that farmers should have choices – this issue needs re-thinking – This is the advantage to a grower group and a company able to market and orient markets too. Criteria/phrases need writing for each score – again consistency between inspections and Inspectors;		Wording of the norm level changed to include the option that producers are either not obliged to grow the certified crop or have an option of crops to grow. Other option would be to delete the CP altogether
3.6.2	The checklist for this section should comprise fields/ a table where the inspector has to insert the prices / costs to which the FT price should be compared.	AI, 29.07.2010	Will be done in report format
Principle 3.6.2	It states 'prices paid to producers organisation or contracted production' – that 'prices paid to producers should always be higher than for conventional'. As a generality this would normally be the case. However, there could be circumstances whereby conventional prices were very high; making it very difficult for the purchaser to pay this price plus an ft premium. Therefore this statement of 'always paying a premium over conventional needs a qualifier for exceptional circumstances. Working on the basis that there should be a good relationship between vendor and purchaser; there should be enough flexibility for those parties to find solutions in such circumstances – ft is NOT a 'one way street' it requires mutual understanding and thus, give and take over time.	RH	Considered in revised guidance texts with regard to pricing-
3.6.2 Pricing	The stipulation / principle that "...the prices paid to producers are always higher than for conventional products..." does not offer a rationale for why FFL prices should be higher under any market conditions and are meaningless since they do not provide guidance by how much and are inconsistent with the guidance provided under c). The same applies to pricing guidelines in 6.2.2). Prices should make sure that producers and groups can earn a profit with their goods, as addressed by the floor price, and that price	GL,31.July 2010	Considered in revised guidance texts with regard to pricing-

	<p>premiums (in addition to the fair trade development premium) are paid for specific attributes, such as particular qualities, organic produce etc. As is recognized under c) there is no reason why producers, during times of high market prices, should receive any premium in addition and it is confusing to post the requirement for an “always higher price” as a principle.</p>		
3.6.2 Pricing	<p>I agree entirely with Gero, that in high market price conditions, the “fair trade premium” should not go to growers versus straight to community development projects. Certainly a premium for organic should be paid directly to the grower though.</p>	DB August 7, 2010	<p>No changes. Small scale organised producers may decide to pay premium to producers at the end of the year – this may be a viable option in many project settings with no coherent producer group or community.</p>
3.6.2 a. b. c. No. 2, 3, 4 No. 7 No. 8	<p>On principle – see previous note are ‘always paid higher than conventional’ The word ‘agree’ - combined with floor price’ might be better than using floor – for some uninitiated; floor may infer low – that is “it’s on the floor”; As previously noted – why link to a ‘FLO’ minimum (as we know FLO’s pricing is open to question) – the key is covering costs plus fair margin allowing for discretionary spend over ‘living’. FLO’s is too prescriptive – lose the link! See previous notes on ‘always paid higher’ – it might be the norm; but is not an always situation; No phrases for scores of 1; No phrase for score of 1 and phrase for score of 4, but only max of 3 in score column; Phrase for score of 4 but only max of 3 in score column;</p>	RH	<p>Link now only to FLO farmgate minimum prices. If FFL producers re paid lower than FLO minimum farmgate price I think this must be justified as FLO minimum prices claim to be exactly the fair price of production. For FLO minimum prices on FoB level there is no direct relation to minimum floor farmgate prices anyway, so no link is needed.</p>
3.6.4	<p>Suggest putting an M for 2nd or 3rd year on trustful relations to buyers. There should be a control on the producer site as well because we have several clients where the buyers would like to stick to long term relationships but the producers just seek the highest price</p>	AI, WOK 29.07.2010	<p>Done, CP added.</p>

	each year.		
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3 PROCESSING AND ARTISAN GROUPS

Topic: Module 4	Comment – Details	Who	Revision Nov 2010
Processing and artisan groups	Needs an own checklist, it is hardly understandable in this form.	FFL team, July 2010	Will be decided for final. Suggested to be add-on checklist to Module 3 rather than a complete additional checklist

4 WILD COLLECTION OPERATIONS

Topic: Module 5	Comment – Details	Who	Revision Nov 2010
Module 5 5.2.1,2	Wild collection on farm? What is that?	AI, 29.07.2010	2 sections on labour issues substantially revised to be applicable to wild collection
5.3.4	The ABS aspects are too important for wild collection to be dealt with in only 1-2 CPs. Therefore, I suggest to take over some of the points from FairWild (although we can word them differently of course), chapter 28-4.1 and 4.2). Especially the points on TK (chapter 28-4.1 a- d) should be included. It would be good to separate the TK and ABS control point, as done in FairWild (at the moment it is one CP (the second one named '1' in 5.4.3 of FFL).	WOK, July 2010	Done, see new requirements in Module 6 Wild Collection
5.4.2	To high expectations; it is already great if the group do good premium projects, why expect them to engage even beyond that, how should they have the time, money and capacities to do all these things?	AI, 29.07.2010	Depends on economical position of contracting company. Bigger companies can be expected to contribute to their community themselves- not only with money provided by their buyers.
5.5.2, CP 7	Include plant and fungi species	TA; 28.07.2010	done
5.5.2, CP 7	In the case that collectors use such species for subsistence use there should be some proof that they are allowed to	TA; 28.07.2010	No changes.
5.5.2	This chapter has been designed in a way as to include the major environmental and management points relevant for wild collection. Some of these are very generic,	WOK, July 2010	Some requirements from Fairwild were included in

	<p>especially CP 2 and 3. It would be useful to make these more detailed and also take over from FairWild the idea of risk categories and the rigour of what is required. The following aspects seem to be important to be dealt with in separate control points:</p> <ul style="list-style-type: none"> Identification of species (including voucher specimen) Maps of collection areas Internal collection instructions Transparent records of collected volumes and collection areas Monitoring of populations of target species and of impact of collection 		adapted manner
5.6.3	<p>Especially in seasonal wild collection operations collectors do not form per se a "group", they can come from widespread, different communities, share the same workplace for a short time of the year, and the question is if it makes sense to force them to organise together, meet annually, have a premium committee etc. At least to leave the option to simply pay more to single collectors.</p>	AI, 29.07.2010	<p>Requirements regarding group organisation were changed in Module 3 – basis of module 6 wild collect. In final version any other changes of Module 3 will be updated in Module 6 as well.</p>

5 HANDLING OPERATIONS

Topic: Content – Module 6	Comment – Details	Who	Revision Nov 2010
General	Simple overview charter of supply chain (see also what Kerry has sent – could be a basis for it) with related audit, certification and registration requirements.	FFL team, July 2010	Planned once requirements are finally agreed
General	Why SR for primary buyers required? I think it is enough on BH level. For all other handlers and processors, in which country ever, certification is a "CAN"..? It is so much more strict for sub-contracted processors and for buyers, why this difference...; contradicting to principle 6.3.0 "all handlers demonstrate fair working conditions"/ What is the "proof of decent work conditions"?	AI, 29.07.2010	Considered in adaptation of chain of custody requirements. But Fairtrade buyers have key role and must become FFL certified operations, and as such they must demonstrate fair labour condition. But can also prove with ETI reports
Trader requirement in general	Module 6: We are still having difficulty understanding the differences and requirements for handlers, processors and traders. For example, when is a processor/trader required to be certified handler and when do they only need to be registered?	RE	Substantially revised section on requirements along chain of custody in module 1 – with better summary in Module 4 handling

	<p>Unclear FLO-Equivalency: To help us better understand this, we request that IMO write a statement on FLO equivalency and how it relates to these standards. Our current understanding is that our supply chains are covered under FLO equivalency until we own the product, meaning that the various contract manufacturers we work with will continue to use FLO certification and need not necessarily go through any IMO certification or registration as a handler. This is our understanding, but again we feel it is vital to receive a written statement from IMO clarifying the concept of “equivalency.”</p>		<p>operations</p> <p>Clearer requirements for all purchases from FLO trade chains including in Module 4</p>
<p>Overview control requirements traders and handlers</p>	<p>Also Module 6: On Page 3 in the box titled “Processors and Traders” under “Who,” in the third column over under “What does Fair for Life FairTrade Handler Cover,” it says, among other things:</p> <p>-Registered trader of Fair for Life</p> <p><u>Products:</u></p> <p>--No inspection, no certificate, no claims regarding being Fair Trade Certified</p> <p>--Registration and labelling contract (administration fee applies). Proof of decent working conditions must be provided.</p> <p>--May only buy and sell Fair for Life certified products</p> <p>→Our question here, just as an example of seeking more clarity, is: does this really mean this handler cannot buy and sell products that are not Fair for Life certified?</p> <p>→Also, as a general comment on this that can be extended to a broader interpretation of standards expected of various handlers in the supply chain, we like the first two bullet points (“No inspection..., Proof of decent...”). For many of the what we would call processors or co-packers, this level of expectation feels more realistic than requiring them to undergo a full audit or inspection like producer groups or brand holders do.</p>		<p>Comments considered in revised section on requirements along chain of custody in module 1</p> <p>Yes, intermediate and contracted traders of FFL products may chose to only become registered.</p>
<p>General – Retailer with own brand</p>	<p>Although I like the idea to include retailers with own brands in the certification scope from a political point of view, I strongly believe that we at Dept. 5 can not handle this in a realistic way. From all current applications, we can see that ready packed FFL products from only one producer go to about 10 different points of sales. If we include this in our scope, we would first of all need to find out all detail information, which alone is very time consuming. Then we need to contact all of the companies, informing them about their obligations if they have more than one FFL product in their assortment.</p>	<p>JUE, Aug. 2010</p>	<p>Considered in new requirements regarding certification of FFL brandholders in Module 1 – see guidance text on retailer own brands</p>

	<p>And in the end there will be many inspections coming up. And what shall we do if they do not agree to be certified? Then we stop marketing of the final packaged FFL products? Another issue to think about: for example Whole Foods: THEY accepted us as fair trade certifier. So should we now go there and tell them that we now want to check if they are allowed to sell any FFL products??</p> <p>In my opinion, we should not loose sight of our basic intention: to support marginalized producers and workers and create a marketing potential for them. If we now try to include as many steps of the trade chain as possible in the certification, in the end we will create exclusive markets and producers are not able to sell their products, as there might be no handler, processor, retailer fulfilling our requirements. If we go for supply chain certification, this will in the end mainly serve the consumer, who can be sure that all steps in the chain have been checked and are fair. But I do not think that this is our goal.</p>		
Retailer own brands	<p><i>During FTFuture Conference in sept. 2010 the Equally exchange team and IMO representatives discussed brandholder requirements and in particular private labelling for retailers in detail. Key comments:</i></p> <p>Even an organisation like EE would not have any leverage at all to request big retailers for whom they produce private label products and others to become registered, let alone brandholder certified with IMO just to be able to us the FFL seal on own-label chocolate from EE.</p> <p>However, EE still finds the questions interesting and important, and to some extent it may even help to strengthen the power of their own brand rather than having it being sold under the retailers own brand.</p> <p>Overall the agreement was that yes, in principle retailers own brand would be good to have under brandholder requirements, but in practice this poses so many constraints and is so unrealistic that it may be up putting all constraint and limitations on FFL brands who wish to market their products to retailers. Normally retail own brands don't act that much as brandholders that they would be much involved in sourcing, let alone can make any commitment to producers – that's why they normally source through other brands or private label companies.</p>	RE and others from EE during conference	Considered in new requirements regarding certification of FFL brandholders in Module 1 – see guidance text on retailer own brands
General	I think this is a first step towards supply chain certification. In many more thorough certification schemes (organic, FSC, MSC,	WOK, July 2010	Considered in new requirements

	<p>etc.) control requirements do not stop after only one or two steps but all (or at least most) parts of the supply chain are included. I never quite understood why this is not the case in fair trade, which is a very comparable type of product certification. Even more ironic, it is the only one that already claims in its name that the product is traded fairly. – Only looking at production and maybe a bit of processing may make a product fairly produced, but certainly not fairly traded, because the following steps of the supply chain are by definition a part of trade. We see in some of the audits we now do in countries like Germany how uncomfortable companies over here feel to disclose their documents regarding the working conditions in their own companies – something they would claim that it has to be done on the side of their producers. Further steps into supply chain certification can help reduce the arrogance of some of these companies with which they are thinking they are better than their producers and make them in the end a fairer part of the supply chain.</p> <p>So, I think the proposed approach is a good move into this direction. Of course we should not overload the system and the exemptions made are certainly useful.</p>		<p>regarding certification of FFL chain of custody. At least decent working conditions must be demonstrated along entire chain. Revision of requirements to not overload the system and remain practical.</p>
General	<p>How do we deal with intermediate processors / manufacturers / traders?</p> <p>Our suggestion is that we audit / certify them as intermediates in year 1 and – if no conditions – again after three years etc.</p>	<p>FFL team, July 2010</p>	<p>New section on intermediate traders added in Module 1 and separate Part also in Module 4 with detailed requirements</p>
Module 6	<p>Please clarify (as noted in my comment under 1.3.2.3) that companies in receiving countries who merely facilitate importation (clear shipments) who may on pro forma invoices and Bills of Lading be listed as consignee and possibly be the recipients of organic transfer certificates for imports into the EU, but are not in fact buying and selling FT materials are NOT subject to the full audit requirements of a “Primary Fair Trade Buyer” but just a registered trader.</p> <p>Such companies should not be subject to the requirements of 6.3. Requesting this category of handlers to prepare FT policies also appears to be excessive and serves no purpose. In particular during these early years of expanding fair trade to a wide range of products, there will be the need to use the services of often small companies who “just provide a service”. As long as these services are minimal, do not directly affect the handled goods or involve relevant interaction with the producer/group, and the flow of goods through these companies is traceable FFL</p>	<p>GL,31.July 2010</p>	<p>Mentioned more explicitly in Module 1 that such traders are considered “intermediate traders” with the respective reduced control requirements</p>

		should limit substantive requirements.		
.1	No. 2 No. 9	There are two 3 score phrases – second should be a 4?; Need defined phrases 0 to 4 for consistency;	RH	Considered in correction of control points, missing rating levels added wherever possible.
6.1.2	No. 4	Ditto;		
6.1.3	No. 4	TNP at 6 – as noted before TNP's need to be defined – that is – what is the total made up of?		
6.1.4	No. 3 No. 6	No phrase for score of 1; No phrase for score of 1;		
6.2.1	D.	This private requirement can to a degree be justified as a private requirement for organic beyond organic requirements; however with all the documents and records required for FFL is this really necessary? And how will an Operator get this certificate from an equivalent FT type certifier? - If IMO wish for this; then I also believe they should absorb this as a cost – certainly no charge should be made to the FFL licensee; Please see previous comment on financial advances under module 3. Also why should pre-financing be a “right”; this is not to say it might necessary, be crucial and is something that should be agreed on between parties: in the end no one is forcing anyone to do business – are they?		
6.2.2	B & C No. 1 & 2 No. 8	See previous on ‘floor pricing’ No phrase for score of 4; Define phrases for 0 – 3 scores for consistency; See previous on TNP's?		
6.2.1		This section's main intent appears to be the establishment of terms of trade for the protection of the producer company in a developing country. Notably, FFL would become involved in assessing the fairness of a trade relationship between a buyer in the West and a Western producer company that operates a producer group. In this case, the latter may have market power, may show unprofessional behaviour or be unreliable not due to their own fault, thus prompting a buyer to make back-up plans to be able to supply product to the market. The social responsibility of a buyer should not be judged on the completion of an MoU (No.1) or their style of communication – there are always two sides to a story and an FFL inspector or certifier will usually not be able to determine “the truth”, nor should they. I suggest a revision of standards, control points and scoring system.	GL,31.July 2010	Some basic guidance added on companies buying from their own subsidiary companies and the respective control focus when assessing these trade relations.
6.2.2	FFL pricing	See comments under 3.6.2 regarding “FFL price always higher than conventional prices”	GL,31.July 2010	Considered in revision of pricing

	in contrast to guidance under item d)		requirements.
6.3	<p>Here it is a “must” that all handlers are SR certified. I would not do this: the Module 2 does not work well in developed countries and we have to many interim steps/handlers which are clearly not interested themselves in any FT issue but do a processing or trading step.</p> <p>The difference for “CAN” or “Must” of Handler certification is if they want to label the product and sell it with label. But in interim steps in the chain, how important is that? If they are final sellers, they are BH. But if they as Aldi suppliers put the label on the product and do the final packaging (for Aldi), but own the product, they have to become certified? Don't make so much sense I think...</p>	AI, 29.07.2010	Considered in improved definition of control requirements along the chain of custody. Lower requirements for intermediate traders. There is not must that ALL traders in chain of custody are SR certified. But all must demonstrate at least decent labour conditions.
6.3.0 – Table in Module 1 (1.3.2.3)	<p>'Companies need to hand in proof of decent work conditions' is not defined. It needs to be defined how this proof should look like, and what it comprises.</p> <p>CPs are missing in this section to define the decent working conditions.</p>	FFL team, July 2010	Clearer requirements added in part II of Module 4 for intermediate traders and in section 4.3 for fair for Life certified handlers
Subcontractors	We would suggest including the 'value adding' aspect in the differentiation between major and minor subcontractors, again.	FFL team, July 2010	Considered in revision of control requirements for intermediate and contracted traders (Module 1)
Conveyor	It is unclear to us what a conveyor is and how his role is different from other buyers. Why do we need him as a separate category?	FFL team, July 2010	Considered in revision of section on Fairtrade buyers and conveyors.
Fair Trade Sourcing Commitment (6.1.1), also 6.1.2b	For the majority of traders, including most intermediaries and buyers etc., this is quite unrealistic. They are not interested in maintaining FT relationships and are often not able to do this due to the trade margins and communication restraints. It is unrealistic to force these companies to FT Sourcing Commitments (they should not need to have a FT policy etc.). These aspects are only relevant and justified for FT Primary Buyers and Brand Holders.	FFL team, July 2010	No changes. These requirements only apply to brandholders and Fairtrade buyers from producers.
3.6.2 Floor / Sales / Farmgate Floor Price	Floor and Sales Price Definitions are unclear to us. Number of terms should be reduced (very confusing) and more clearly defined and explained in easier words. Checklist should include table in which prices need to be entered by auditor.	FFL team, July 2010	No major changes, but considered in text revision of pricing definitions in module 2 and 3, and section module 4

6 TOURISTIC SERVICES

Topic: Content – Module 7 Touristic	Comment - Details	Who	Revision Nov 2010
Module 7	Although it is an interesting subject I would suggest not developing it further at the time being. Only, if there is an interested operator which whom checklists could be tested as pilot. So far I would simply leave it as it is proposed in Module 7.	AI, 29.07.2010	Agreed – Module was not revised
7.4.2, CP 3,4	Use of biodiesel as fuel should be removed. This subject is very contradictive. In most cases energy plants are especially for this use planted on areas which have been cleared from forests, are needed for the production of food crops or on areas which are needed as barren land.	TA; 28.07.2010	No revision yet
7.4.3, Location	The hotel /other accommodation should not be directly on the beach. There should be a minimum distance to the beach.	TA; 28.07.2010	No revision yet

7 INTEGRATED PRODUCTION CRITERIA

Topic: Content – Module 8 Integrated Production	Comment - Details	Who	Revision Nov 2010
Module 8	I think it is much to detailed and long (the plants part; animals is ok); it will take a lot of time at inspection and evaluation to go through this very detailed input requirement it seems almost an organic inspection.	AI, 29.07.2010	No changes Only applied in case no organic, GAP certification and all key aspects must be ensured.
1.1, CP 1	Documentation should include which product(s), quantities, when, where, area size, application equipment, applicant, person who did the mixture and person who approved the application. The data should be analysed to determine ways of reducing agrochemical use.	TA; 28.07.2010	control point adapted accordingly
1.1, CP 6	Add in (2) avoid pest control methods that support resistance building.	TA; 28.07.2010	control point adapted accordingly
1.2, CP 9	Add in the brackets: “mixing is done in a way to avoid contamination of water courses and soil, pesticides are not mixed to avoid reaching the legally allowed levels of individual pesticides.	TA; 28.07.2010	control point slightly adapted
1.2, CP 10 Aerial spraying	MUST should be 2, not just 1	TA; 28.07.2010	No changes
1.2, CP 12	Should be M=2 and with more explanation: (2) discharged properly, minimising negative environmental impact and preventing contamination of open water bodies, <i>groundwater and soil (i.e. water from rinsing</i>	TA; 28.07.2010	control point adapted accordingly

	<i>pesticide containers should be poured in the pesticide tank and water from rinsing application equipment over an untreated part of the crop and not exceeding normal application levels.</i>		
1.2, CP 13	a) Should be M=2 b) Include “surplus pesticides”, i.e. “Disposal of used agrochemical containers, obsolete stock or surplus pesticides” c) Surplus stock is discharged properly, minimising negative environmental impact and preventing contamination of open water bodies, groundwater and soil (i.e. over an untreated part of the crop and not exceeding normal application levels (→ maybe this could be included in CP 12) d) empty containers may also be disposed of at official collection sites if these sites are able to guarantee proper disposal	TA; 28.07.2010	Considered in revision of respective control points
1.3, CP 2	a) Should be M=3 b) Documentation should provide information on quantities, when, where, area size, application equipment, applicant, person who did the mixture and person who approved the application. The data should be analysed to determine ways of reducing agrochemical use.	TA; 28.07.2010	No changes.
1.3, CP 9	Add: “Control of runoff and wind erosion from newly tilled or planted areas. Prevention of sedimentation of water bodies.”	TA; 28.07.2010	Included in control point
1.3	Add CP “Land burning is not allowed to prepare land.”	TA; 28.07.2010	No changes. This is included in the environmental responsibility criteria
1 and 2	Requirements for plantations and groups should be the same.	TA; 28.07.2010	No changes. Author does not agree. Minimum levels and levels of documentation must be different.

Topic: Content – Environment	Comment - Details	Who	Revision Nov 2010
GMOs to be prohibited	Not included in environmental criteria of Module 3 so far. As UTZ Certified accepts GMOs, it is not sufficient to include provision in Integrated Production Criteria only, but we need to include them in the Environment chapters as well.	FFL team, July 2010	Included in Module 3
GMOs to be prohibited	No use of GMO seeds or GMO propagation material.	TA; WOK 28.07.2010	Already part of general environmental criteria.
Textile projects	For textile projects which are not GOTS certified there should be special environmental criteria, e.g. concerning dyeing chemicals	TA; 28.07.2010	Planned if FFL gets textile operation which are not GOTS
Aquaculture	The operations should not use feed that derives from overfishing or from fishing which focuses only on the capture of fish as feed.	TA; 28.07.2010	Planned addition. No specific requirements

Aquaculture	Juvenile species should derive from an own breeding programme or from a breeding programme of another operation which can provide sufficient proof that the juvenile individuals are not taken from the wild.	TA; 28.07.2010	defined yet
Energy sources	We should consider to generally prohibit the planting of plants as energy source unless trees are planted on already used areas, i.e. shadow trees which are then used for fire. This should only be done under the provision that no forests and other biotopes have been cleared for agricultural use. If we allow the planting of plants for energy reasons we should make some constrains: "Plants are grown for purposes of energy production only on fields that are not used for the production of food crops, on land that does not function as fallow land, corridor between biotopes or has been turned into agricultural land after 1997. <i>TA: I have used the year 1997 as a mark because this is the year used in the FSC Standard. Plantations on land cleared after 1997 may not be certified acc. to FSC.</i>	TA; 28.07.2010	See comments in general environmental section, we should keep environmental verification simple and practical. This proposal seems very tricky to implement and verify for various crops which may be used for food and by final buyer for energy use.
Energy sources	In cases where wood is used as fuel, e.g. during distillation of plants to get oil, this is not allowed to derive from forest destruction.	TA; 28.07.2010	This is somewhat addressed in assessment of energy use in the Environmental Responsibility sections – will need further strengthening if confirmed as additional focus in stakeholder consultation
Energy sources	No use of agrifuels (biofuels/biodiesel) as energy source that derive from ecosystem destruction or from land that is crucial as a biotope corridor or for the production of food crops.	TA; 28.07.2010	
Energy sources	Use of own biogas: the biogas sites of the operations should be so small as to be used to capacity by what the operation and other near operations have to offer. It should be avoided that big sites are built for which plants for energy production have to be produced in order to reach their capacity limit. Generally on use of biomass: only if biomass derives from (crop) production waste and not from plants grown only for this reason.	TA; 28.07.2010	
Land clearing, e.g. Mod 2 2.4.3, CP 6; Mod 3, 3.5.3, CP 10; Mod 5.5.3, CP 10;	Why should we accept land clearing of natural biotopes? What are the ecological benefits of land clearing by burning?	TA; 28.07.2010	No changes. These are very far reaching high bar environmental requirements which so far are not core content of FFL (nor even organic).
Risk assessment	Add CP: The potential social and environmental impacts of new work or activities must be evaluated. These include expansion of production area, construction or installation of new infrastructure, major changes in production or processing systems. The evaluation must be carried out	TA; 28.07.2010	No changes Seems very far reaching and high bar – this is so far not a main content of FFL

	before the initiation of any changes or new work in accordance with applicable law, or in their absence, based on technically accepted and recognised methods. Any evaluation must include procedures for monitoring and evaluating the significant impacts identified and not foreseen during the development of new works or activities. Regular environmental risk assessment studies are conducted, Conservation plans are revised and implemented accordingly.		and would require substantial efforts from producers.
Responsible persons	Add CP: Operation must have a person responsible for environmental issues (environmental officer (<i>UmweltbeauftragteR</i>))	TA; 28.07.2010	No changes, see comments above
Bush meat	Add CP: No use or selling of bush meat.	TA; 28.07.2010	No changes, see next comment
Bush meat	Shouldn't we allow bush meat, if sustainable management practices are applied? Or do you think establishing sustainable hunting schemes are too complex (I am aware they are, especially in areas with strong pressure by human populations). But still, it is not per se negative to use and sell bush-meat, I think.	WOK, July 2010	No changes.
Maps	Add CP: All operations should have maps including the following: field, production sites, collection areas, protected areas, water courses, biotopes, settlements, industry sites etc.	TA; WOK 28.07.2010	Required for wild collection, so far not for producers. Possibly yet to included in Module 1 as control requirement?

Summary prepared and comments added by Florentine Meinshausen, Nov. 2010.