



## LEAF Marque Standard v15 Draft - Public Consultation Synopsis

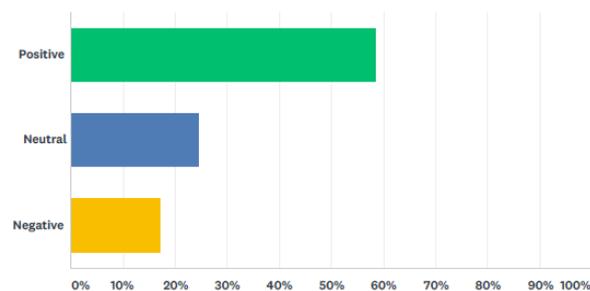
The LEAF Marque Standard v15.0 Draft Public Consultation ran from the 30<sup>th</sup> November 2018 to 30<sup>th</sup> January 2019. Thank-you to all that participated and provided feedback – we greatly appreciate the input from our stakeholders. During the consultation, LEAF collated all comments and feedback received, which was then discussed by the LEAF Technical Team and Technical Advisory Committee (TAC). This document provides a synopsis of each material issue and the corresponding action taken.

There were various strategies to obtain feedback. A key strategy for feedback was a survey which went through each section of the LEAF Marque Standard to ask targeted questions on the proposed changes made to the LEAF Marque Standard v15.0 Draft. In addition, comments could be provided by emailing a member of the LEAF Technical Team directly, or by submitting either a spreadsheet or document.

The survey asked whether the respondent felt that each section of the Standard contributed towards achieving its corresponding intended impact. For each section of the Standard, the majority of respondents agreed that the Control Points (CPs) achieved this.

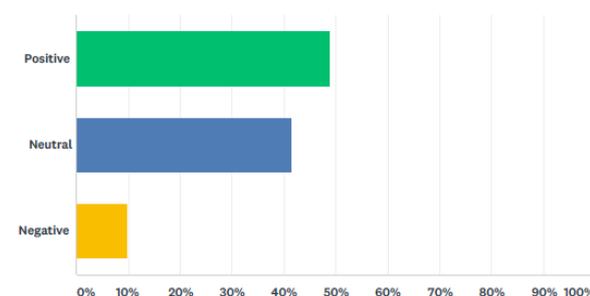
### Organisation and Planning

- Feedback on **changing the name of the Farm Environmental Policy to the Integrated Farm Management (IFM) Policy** was positive; when asked in the survey, 58% thought the change was positive, 25% were neutral and 17% negative.



Additional comments raised concerns that this phrasing added unnecessary jargon, it could be confused with Integrated Crop Management, and a business emphasis rather than environmental could be detrimental. However, these comments were discussed and felt to be addressed by the Standard; LEAF's IFM is clearly defined and underpins the entire Standard so it is relevant terminology, and in order to achieve environmental impacts a degree of business focus is needed.

- There was mixed **feedback on the changes to CP 1.2: *The business is a certified full member of an approved baseline certification system for each product.*** Whilst the survey responses had very few negative responses to the change (49% positive, 42% neutral, 9% negative), there were additional comments that highlighted concerns that LEAF felt were important to address.



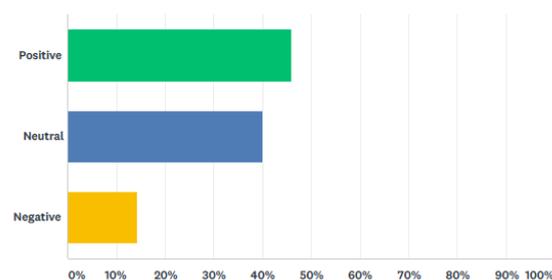
Comments stated that the phrases “minor product” and “detrimental to the farm as a whole” were vague and could be interpreted in different ways. In order to address this, the LEAF Marque Standard will be amended to include “Contact LEAF Marque if unsure”. In addition, both phrases will be added to the LEAF Marque Glossary. To add further clarity and strength to the wording, “may be exempt” has been changed to “are exempt”. LEAF Marque will continue to review this CP when revising the LEAF Marque Standard in the future.



- Respondents were asked their thoughts on the **LEAF Marque Chain of Custody** requirements in CP 1.18 – 1.21. The feedback was generally negative, stating that the system and process was not clear, too complex and on occasion lacking in relevance. This feedback in combination with comments received since the system was implemented has led to the decision to replace the Chain of Custody system with a Claims and Labelling system. This will be implemented through the introduction of a Claims and Labelling Licencing Process and enforced by the LEAF Marque System Rules, rather than a number of CPs within the LEAF Marque Standard as it is applicable to both LEAF Marque certified businesses and businesses in the supply chain. Information on this will be published alongside the development and implementation of this system.
- A comment stated that staff may not be **trained to assess the severity of risks** in CP 1.17. However, the requirements of the Standard do not state how this assessment should take place and it can be done in a way appropriate to the business. In addition, a guidance document is available.
- The **amendments on CP 1.11: *The Integrated Farm Management Policy has been communicated to suppliers and contractors*** received concerns that relevant individuals may be excluded. This was discussed at length with the LEAF Technical Team and TAC. The decided outcome was that the phrasing should be simplified in recognition that the business knows the most appropriate way to communicate the IFM Policy; how its communicated, to whom, and the relevant aspects of IFM.

### Soil Management

- The feedback on the **new CP 2.14: *Soil health is measured*** was generally positive. There were four positive comments, and the majority of respondents in the survey felt the change was either positive or neutral (46% and 40% respectively, with 14% having a negative perception).



The criticisms raised were varied, ranging from the CP being too vague to too specific, or it being too time-consuming to not long enough. When discussed, these comments were attributed to the CPs aim to be general and providing guidance. As a result, these comments supported its inclusion as a “middle ground” CP, and no action was deemed necessary. As a Recommended CP, any non-compliances against this CP will be reviewed and research in this area will be used to inform the development of v16.0 of the LEAF Marque Standard.

- Several comments stated that **cover crops could have greater reference** in the LEAF Marque Standard to highlight the various benefits they can deliver. The LEAF Marque Standard does include reference to cover crops and on discussion, further inclusion was not felt appropriate as it may not be applicable to all businesses. However, the LEAF Sustainable Farming Review (LSFR) will be reviewed and links included where possible.



- Several comments stated that **further guidance could be given on completing tasks** required in the LEAF Marque Standard, such as Nutrient Management Plans. However, this guidance is provided elsewhere in the industry (for example, RB209), there is not a globally applicable guidance available, and it is not the role of the LEAF Marque Standard to provide this advice.
- One comment stated the potential opportunity to provide guidance **on soil management strategies to address flooding**. Many of the requirements in the LEAF Marque Standard already address flooding, however, a LEAF Project has been established to review what more can be done for the LSFR and to inform the development of v16.0 of the LEAF Marque Standard.

#### Crop Health and Protection

- In both the survey and other comments received, **repetition with baseline systems** was highlighted as an issue. Some degree of repetition is to be expected in the LEAF Marque Standard as it is based on multiple baseline systems with different scopes, of which the requirements are variable. However, in response to this feedback a LEAF Project is being initiated to formally review the LEAF Marque Standard in comparison with the approved LEAF Marque baseline systems to assess whether there is any avoidable duplication. This will inform the development of v16.0 of the LEAF Marque Standard.
- One comment stated that **risks identified in the Pollution Risk Assessment should be communicated** to staff and contractors. Whilst this is referenced in the guidance document it was recognised that this could be emphasised more, and so further specification was added to CP 4.5: “risks are communicated to staff and contractors”.
- A comment queried why **crop variety selection** did not also include **reference to drought tolerant crops**. The TAC discussion highlighted the various benefits of crop variety selection, which can be collated into a single bullet point: “Selection of varieties relevant to production systems and long-term sustainability”.

#### Pollution Control and By-Product Management

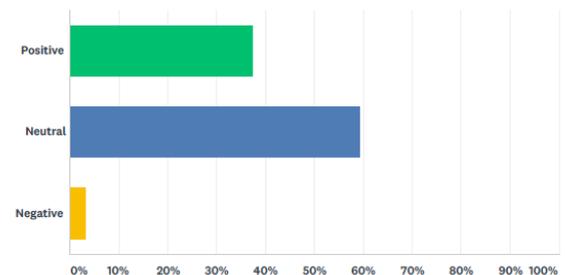
- **Plastics and Food Waste** management were raised as issues that the LEAF Marque Standard could do more to address. Whilst the LEAF Marque Standard requirements are inclusive of both of these factors, their importance was recognised resulting in the establishment of a LEAF Project. In March 2019, workshops were run in collaboration with WRAP. The findings from these workshops will be reviewed and used to inform developments to the LSFR and v16.0 of the LEAF Marque Standard.
- Several comments suggested **additional guidance** could be provided, such as strategies to **minimise the loss of nitrogen and groundwater pollution**. The expertise from these comments was valued and they have been added to the appropriate guidance documents and CPs where appropriate.



- **Air pollution** was highlighted as an aspect that LEAF Marque could do more on. Further research will be needed before any changes can be made to the LEAF Marque Standard, and so it has been allocated as a LEAF Project to inform the development of v16.0 of the LEAF Marque Standard.

### Animal Husbandry

- The **Animal Husbandry section** was developed for v14.1 and new CPs added. These changes received a mixed response; the majority of survey respondents perceived this change as neutral (38% positive, 59% neutral, 3% negative), although there were an additional 4 positive comments from the survey. Negative comments from the survey were also received, with one commenter highlighting that “undue grassland damage” could be interpreted in various ways. As a result, the phrasing was amended to “measures are taken to avoid damage to grassland by livestock...”.



Further comments raised concerns that the Standard was not inclusive of large ruminant livestock. These concerns were discussed but no changes possible were identified as the Standard is not enterprise specific, and the requirements are applicable to ruminant livestock. Considerable improvements to improve the livestock offer have been made, and future development of the Standard will continue to improve this further.

- **“Lightly Fouled Water” was suggested to replace “Dirty Water”**. This phrasing was also felt to be open to misinterpretation, and so Dirty Water has been kept but a definition has been provided in the LEAF Marque Glossary.
- Several comments referred to the **Farming Rules for Water** document and asked for greater **reference to livestock near watercourses**. However, these documents were reviewed and no action considered necessary as the LEAF Marque Standard already includes reference to these concerns, and it is not appropriate to provide regionally specific guidance when LEAF Marque is global system. However, it will be considered for the development of the LSFR.
- One comment requested a **greater emphasis on reducing the dependency on brought in protein**. However, the LEAF Marque Standard currently addresses the source of feed and further emphasis would not be feasible as it may not be appropriate or possible in all businesses.

### Energy Efficiency

- Several comments stated that reference to **carbon use and Greenhouse Gas (GHG)** emissions could be placed in different **sections of the LEAF Marque Standard** or as a separate section on the IFM wheel. Categorisation of GHG emissions and carbon use within the Standard is challenging as its applicable to multiple sections. Following discussion with the LEAF Technical Team, adding this as a separate section of the IFM wheel was deemed not appropriate as it is composed of practical steps a



business can take rather than broader issues such as GHG. Further review and research will be needed to assess which section of the Standard these topics are most appropriate in and will inform the development of v16.0 of the LEAF Marque Standard. The results from a current LEAF Project reviewing how IFM contributes to GHG emissions will be reviewed in the context of the Standard, and this will be used to consider the current categorisation and if it could be improved.

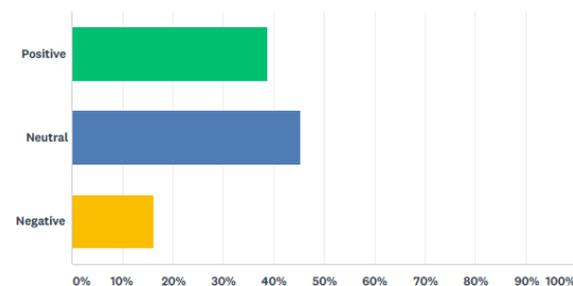
- One comment highlighted that in some businesses there may be an **unclear distinction between the energy use of the business and household** and that this can make the requirements on monitoring energy use challenging and confusing. To clarify that measuring the businesses energy use was compulsory but additional monitoring was optional and to be determined by the business, further information has been added to the Energy Action Plan guidance document.

### Water Management

- Several comments stated there could be greater reference to **water quality** and actions taken at a **catchment scale**. This was recognised by the LEAF Technical Team and a LEAF Project has been established to review water quality and catchment scale activity. This will be used to inform the LSRF and the development of v16.0 of the LEAF Marque Standard.

### Landscape and Nature Conservation

- **CP 8.14: Field margins and boundaries are under sympathetic management** received little negative criticisms from the survey (the thoughts on the suggested changes were 39% positive, 45% neutral and 16% negative), and received both positive and negative additional comments.



Some suggestions in the comments were UK or regionally specific so would not be appropriate for inclusion in the LEAF Marque Standard due it being a global system. Another comment stated the changes as “too prescriptive”, but these requirements were deemed necessary to ensure the aim of the CP is achieved.

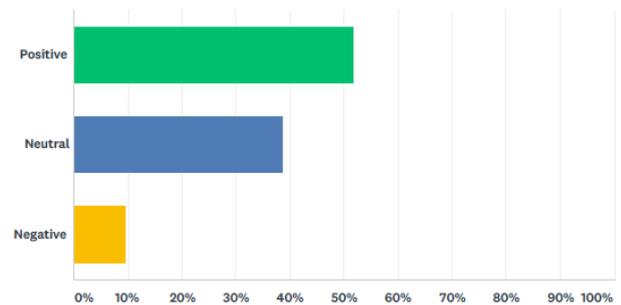
- The new **CP developed in the outcome-based approach project, CP 8.27** received very positive feedback, both as an outcome-based biodiversity strategy, and in its feasibility. Numerous positive comments were received, but there were some criticisms stating that the CP could be a burden on finances and time, and that a list of indicator species would be helpful. These comments were considered during the development of the CP and the verification text was worded carefully to ensure they are addressed. Advice can be obtained by any relevant individual in a way appropriate to that business. This removes the necessity for a list of indicator species, which would also not be appropriate as it could not be globally applicable. A guidance document is in development with case studies of how advice can be obtained, and the CP will only be Recommended in v15.0.



- Several comments stated the **challenges** of including **rented land** in the Standard and that for these producers it is difficult to invest measures to enhance biodiversity. These concerns had been raised previously and following this a review had been undertaken to assess the requirements of the Standard, what they delivered, and their feasibility. The results indicated the complexity of the issue and that the current requirements were most inclusive and appropriate at present. This will continue to be reviewed in the development of v16.0 of the LEAF Marque Standard.
- Several comments highlighted **various CPs** that could be **made Essential**; e.g. CP 8.15 and 8.21. LEAF Marque were pleased that the CPs were considered successful enough to implement as Essential. However, at present, more evidence is needed and time in the Standard as Recommended before a change to the requirement level can be implemented.
- Comments on the **specifications within the requirements** (such as 2m from watercourse centre, non-cultivated margins) were raised, however no action was taken as the current requirements had been carefully developed to be globally applicable and achieving the intended aim of the CP.

### Community Engagement

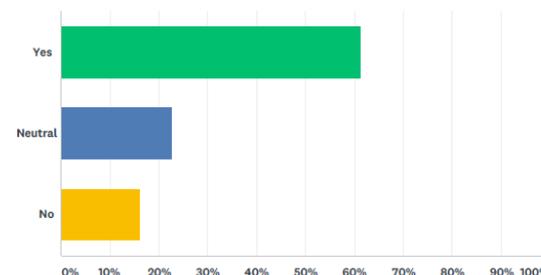
- The **revised Community Engagement Section** received generally positive comments; the survey respondents perceived the changes as positive (52%), neutral (39%) and negative (9%).  
One comment stated that it was inappropriate to draw on international examples, yet the LEAF Marque Standard is globally applicable and so aims to be as internationally relevant as possible.



- A comment from the survey highlighted the **challenges business face from the increasing opposition towards farming** and the livestock sector in particular. In discussions with both the LEAF Technical Team and the TAC, this was recognised as a very important issue but not one that was in the remit of the LEAF Marque Standard. However, it is addressed by LEAF’s Open Farm Sunday and LEAF Education, which aims to engage and educate the general public about farming practices.

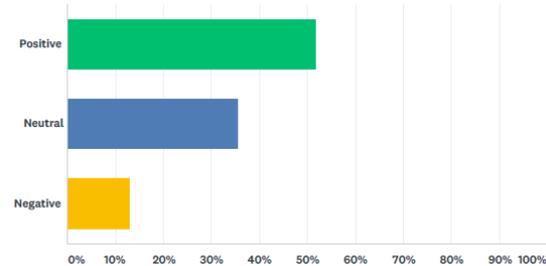
### Other

- The **amended description of verification icons** aimed to add greater clarity to the requirements and was received positively, with 61% of survey respondents agreeing this change was helpful (16% disagreed and 23% were neutral).





- Amendments to the Standard to **incorporate lean management principles** received a generally positive response, with 51% perceiving these changes as positive, 35% as neutral, and 13% negatively. 2 positive additional comments were received, but negative comments raised concerns that the requirement for both the plan and its implementation to be reviewed was burdensome. On discussion, no changes were felt appropriate as the requirements are not greater than v14.1 (at least annual can still be annually), and these activities are important to ensure plans are effective, implemented and developed over time.
- A **3-year review frequency** was implemented for v14.1, and this longer frequency of revision was positively received (55% of the survey respondents perceived the frequency as positive, 35% neutral, 10% negative). Given this and with approval from the TAC, the 3-year review frequency will be continued for v16.0, which will be effective on January 1<sup>st</sup> 2023.
- A comment highlighted that it would be helpful to review the **LEAF Marque Standard to see how it aligns with the Agriculture Bill**. LEAF have created a LEAF Project to review this, as it was recognised that this is important to consider.
- Two comments stated that the **website was challenging** and that there were **limited resources for international countries**. LEAF would like to improve the international accessibility of the website and to increase the languages available, but this would require significant investment that LEAF Marque does not at present have. General improvements to the website are ongoing and increasing the accessibility of the system will be considered whenever possible.
- One comment stated that there should be **minimal requirements of cropped vs non-cropped land** to avoid undue environmental damage, for example, in regions such as Almeria. However, on discussion with the LEAF Marque team this is not a requirement that is internationally relevant, and regions that are damaging the environment would not meet the requirements of the baseline system or LEAF Marque requirements so would not be eligible for LEAF Marque certified.
- **Mental Health** of the businesses team members was raised as an important attribute to consider as it involves the sustainability of the business. This was agreed within the LEAF Technical Team and a LEAF Project is being established to review this topic. The results of this will be used to inform developments to the LSRF, and if appropriate, v16.0 of the LEAF Marque Standard.
- One comment highlighted the benefits of reviewing the LEAF Marque Standard against the **Sustainable Development Goals**. This activity had already been undertaken and is an ongoing focus for LEAF Marque. IFM and LEAF Marque's contribution towards the Sustainable Development Goals was included as a case study in the [2019 Global Impacts Report](#).
- Several comments queried the **terminology used in the Standard**. The Standard has been reviewed and any unclear or specific terminology has been added to the LEAF Marque Glossary which will be available online with the publication of the LEAF Marque Standard v15.0.





- Several comments stated that there were **gaps with UK legislation**. However, LEAF Marque is a global Standard and so cannot match the legislation of any one country. In addition, as LEAF Marque requires baseline system certification, these also require that the appropriate legislation is met.
- One comment highlighted that the **order of CPs within the Standard was counterintuitive**. This has been recognised but it is a result of the historic data recording in the auditing process. The trade-offs between historic data and more appropriate ordering will be reviewed to inform v16.0 of the LEAF Marque Standard.

*This document is a synopsis of the comments received. If you provided feedback on the consultation and you like further explanation than provided in the summary above, please contact Lucy Redmore ([lucy.redmore@leafuk.org](mailto:lucy.redmore@leafuk.org)) who will be happy to provide further detail on LEAF's response to each specific comment received.*