The public consultation on the LEAF Marque Standard v16.0 Draft ran from 17th November 2021 to 24th January 2022. Thank you to everyone who participated and for providing comments - we greatly appreciate input from all our stakeholders. As part of the consultation process, LEAF Marque collated all comments and feedback received. The stakeholder feedback was discussed by the LEAF Technical Team and Technical Advisory Committee (TAC). This document is a synopsis of each material issue and the corresponding actions taken by LEAF.

1.0 Stakeholder Engagement: Feedback Strategies

Unless stated otherwise, all questions asked whether the respondents agreed/disagreed/neutral/not applicable regarding whether the Control Points (CPs) delivered their intended impact. The intended impacts were stated in a corresponding ‘summary of changes’ document and referenced in the question title.

The LEAF Marque Standard v16.0 draft was informed by development projects conducted by the LEAF Marque Team. The surveys were divided into questions of the development projects. Comments could also be submitted by email, by writing and by telephone. Comments and feedback received by all methods are included within this synopsis.

2.0 Management Plans

The surveys asked whether changes to Management Plan Control Points (CPs) and introductory text achieved aims of improving clarity, consistency, and auditability of Management Plans.

57% of stakeholders agreed that the changes achieved the aim, 38% were neutral and only 5% disagreed. There were six comments expressing concerns over workload for small businesses or reluctance to publish information sensitive to their business. LEAF Marque recognises the challenges of administrative workload, and this is considered in decisions on document requirements. However, a plan-based Standard enables a site-specific approach, and so documentation is necessary. To support businesses, additional guidance on completing Management Plans has been produced in the form of documented cases studies, a webinar, and infographic formats.

3.0 Collaborative Action (Control Points: 1.22, 1.23)

Two new Recommended CPs were added to encourage farmers to work collaboratively to help achieve landscape-scale outcomes and longer-term impacts.

The surveys asked whether these CPs achieved the aims of encouraging farmers and growers to work together towards landscape scale changes and common goals, such as catchment level water management, biodiversity or staff labour/training.

Overall feedback was generally positive: 54% of respondents agreed that the CPs encourages farmers and growers to work together at a landscape scale and towards a common goal (23% were neutral, 23% disagreed).

![Survey responses to whether CPs 1.22 and 1.23 encourage farmers and growers to work together towards landscape scale changes and common goals](image)
Concerns for both CP 1.22 and 1.23 included practicalities of time and cost, feasibility, challenges of monitoring, and contextual challenges. Concern about auditability. As most of the feedback was positive, and due to being a Recommended CP, no further amendments were identified as necessary. To address the concerns raised, guidance on collaborative and collection action will be published.

4.0 Climate resilience (Control Point: 1.24)

The surveys asked whether the new Essential CP 1.24 ensured farmers and growers identify ways to protect their business from impacts from extreme climate change and increase resilience to future shocks. Overall feedback was positive, 67% respondents agreed (Figure 2), whilst 19% of responses were neutral and 14% disagreed.

Concerns raised in comments were auditability, relevance to contexts, and the challenge of achieving this. To address these concerns and to improve auditability, the CP was rephrased to reference risk assessment and extreme weather events. Guidance related to CP 1.24 and a glossary definition of extreme weather events will also be published.

5.0 Measures are taken to strengthen protection from deforestation (Control Point: 8.28)

The surveys asked whether deleting CP 8.6 and replacing this with a new extended Essential CP 8.28 achieved the intended impact of strengthening prevention of deforestation: 59% of stakeholders agreed that the CP 8.28 strengthens deforestation requirements, 36% of responses were neutral and 5% disagreed. The January 2020 cut-off date was noted to impact currently certified businesses, and another comment suggested an earlier cut-off date. To provide clarification on the need for a cut-off date and to support adaptation to the change, a guidance document will be published.

6.0 Carbon and greenhouse gas (GHG) emissions (numerous Control Points)

The surveys asked whether CP amendments to numerous CPs (1.6, 1.12, 2.1, 2.2, 4.5,) achieved the aim of clarifying the relevance of the Standard to Carbon (C) and Green House Gas (GHG) emissions: 65% of respondents agreed (27% neutral, 8% disagreed). Overall feedback was positive.

In the Standard v16.0 Draft, CP 6.3 was upgraded to Essential, stating that a Carbon Footprinting tool must be used to record GHG emissions. The surveys asked whether the intention to highlight the importance of monitoring to establish a baseline to enable businesses to set targets and strategies for improvements was achieved. Overall respondents agreed (61%), 22% were neutral and 17% disagreed the intended impact was achieved.

Comments were mixed, many welcomed the change, however there were recurring concerns about the time required to carry out footprinting, accuracy of different
tools, how tools use a range of data resulting in different readings, and lack of tools with global or industry relevance. Several comments asked for clear guidance on which tools to use and case studies were suggested. There was also concern about C footprinting being difficult to record for those who rent land and swap crops.

The feedback has been considered in detail because C footprinting is such a complex and important area for the industry. Taking account of concerns, research was carried out and it is clear the farming industry does not currently have fully developed and sufficient C footprinting tools for all sectors. Therefore, it is not practical to make CP 6.3 Essential as worded in the consultation because it is not accessible or feasible for all businesses to be able to achieve this requirement. A core part of LEAF Marque is benchmarking to encourage continual improvement and an intended outcome is to drive climate positive change.

To ensure relevance and accessibility, CP 6.3 has been reworded to make recording GHGs ‘Essential’, with reference to basing this on energy consumption records as a minimum (to account for where C footprinting tools are not available for all sectors). A new ‘Recommended’ CP (6.5) has been created to specify using a C footprinting tool. The intention of this is to help farmers who are not already using a tool to move towards C footprinting, because it is becoming increasingly required by suppliers and the industry. CP 6.5 refers to ‘Scope 1’ (based on the globally recognised GHG Protocol) with a list of aspects that may be included in C footprinting. Sequestration/offsetting is included because this is a vital aspect of footprinting and the best types of tools calculate this.

As 6.5 is Recommended it will not affect certification. LEAF will develop specific guidance to explain how members can meet the Essential requirement of recording GHGs where full C footprinting is not available. Making C footprinting Essential in the future will be reviewed as the industry develops. LEAF is also working on case studies.

### 7.0 Measuring Soil Health (Control Points 2.1 & 2.4)

The intended impact was to include targets to improve, maintain and measure soil health. Surveys asked whether the changes to CP 2.1 and 2.4 achieved this: Overall respondents agreed (65%), 30% were neutral and 5% disagreed.

When asked whether CP 2.4 should be upgraded to Essential, (30%) disagreed. There were notable concerns expressed in comments, based on the variability and applicability of soil analysis techniques, challenges of auditability, and time and cost implications for farmers. To address concerns, LEAF has used language CP to account for challenges farmers may face (e.g., “where climatic and soil characteristics allow” and “A measure justified by the business”). In addition, guidance will be published on what is meant by ‘justified’ in the context of the LEAF Marque Standard to help members understand what is required and to address the risk of inappropriate soil health tests.

<table>
<thead>
<tr>
<th>Table 1. Responses to changes to CP 2.3 and 2.6</th>
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<tbody>
<tr>
<td>Agree</td>
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<td>Neutral / NA</td>
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<td>Disagree</td>
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8.0 Nutrient Management (Control Points: 2.3 and 2.6).

A review of CPs was carried out with the aim of improving sustainability of nutrient use and to embed integrated nutrient management (existing Essential CPs 2.3 and 2.6). 71% of respondents agreed (Table 1.) with the changes to CPs 2.3 (inclusion of integrated nutrient management) and 2.6 (including nutrient availability and use in rotation and cropping planning).

Feedback included whether this would be enough to encourage protected growing towards runoff capture and nutrient recycling, noting limitations of existing soil sampling techniques, suggestions for inclusion of other soil health parameters (e.g., amino acids and microbiota) to be included, and relevance to contexts such as rented land.

Overall, as respondents agree with the changes to integrate nutrient management, the changes can be introduced without further amendments. LEAF will produce guidance to provide clarity and help businesses and auditors understand requirements.

9.0 Water Management (Control Points: 4.5, 4.8, 7.1, 7.4, 7.6 and 7.7)

The surveys asked whether changes to CPs (CP 4.5, 4.8 and 7.1 were expanded, 7.4 was upgraded to Essential, 7.6 and 7.7 are new Recommended CPs) improve and integrate water management to strengthen water catchment working, water sourcing, monitoring quality and optimising water use efficiency (WUE). Overall feedback was positive; 64% agreed that changes to CPs achieved the intended impacts.

Feedback included comments on relevance to different systems, suggestions of minor re-wording, and further information needed on explaining/describing adverse impacts on water quality (CP 7.7). Minor phrasing amendments were made in response, and existing guidance addresses the other comments made on relevance and water quality.

10.0 Plastics and Waste (Control Points 4.10 and 4.11)

Two new Recommended CPs were introduced to encourage a waste audit (CP 4.10) and implement a waste audit Action Plan (CP 4.11). The surveys asked whether the CPs achieved the aim of increasing the businesses awareness of plastic use and encouraged informed management decisions: 76% of respondents agreed, 18% were neutral, 6% disagreed.

Feedback noted that there was little difference from v15.0 of the LEAF Marque Standard, and some businesses stated they are already implementing strategies. Others highlighted that plastic wastes may be the result of suppliers or may vary depending on conditions outside of the farmers’ control (e.g., in response to weather events). As a recommended CP, it was expected that not all businesses would be able to achieve these requirements, and the aim is to identify plastic reduction strategies and encourage continuous improvement. As such, no CP amendments were identified as necessary, and there is also guidance on this topic to provide additional support where necessary.
11.0 Relevance to different systems

The surveys asked about various changes were made to CPs to make them more relevant to different systems, described below:

11.1 Producer groups (Control Point 1.1)

The surveys asked whether updating CP 1.1 clarified that one LEAF Sustainable Farming Review should be completed per Producer Group. Most respondents (67%) agreed (27% were neutral, 6% disagreed), though some commented it was inappropriate for this to be completed on behalf of all members of the group. There are feasibility constraints of anyone other than the operator of Quality Management Systems completing the LEAF Sustainable Farming Review, and so no amendments to CP 1.1 were made.

11.2 Protected Cropping (Control Points 2.1, 8.7, 8.14, and 8.24)

The surveys asked whether changes made to CPs increased the relevance of the LEAF Marque Standard to protected cropping businesses. Of those businesses this was relevant to, the majority (67%) agreed with the changes. No concerns were raised, and the changes were introduced without amendment.

11.3 Livestock Businesses (Control Points 3.1, 5.10 and 5.13)

The surveys asked whether changes made to CPs 3.1, 5.10 and 5.13 improved relevance to livestock businesses. Of those with livestock, the majority agreed (only 2% disagreed). A few comments asked how LEAF can improve representation of livestock and dairy. One comment noted the importance of trees and hedges for sheltering livestock and reducing mortality. LEAF is continuously working towards promoting LEAF Marque to the livestock sectors. For example, three new LEAF Demonstration Farms (LDFs) all have livestock (including pig, sheep and cattle enterprises). Increasing provision of livestock shelter ties in with a development project to consider reference to agroforestry in the LEAF Marque Standard v17.0.

11.4 Rented Land/Contract Farming Agreements – Complex Business Models

The surveys asked whether the requirements for contract farming agreements or rented land are clear and sufficient to encourage best practice. The options for feedback were whether the requirements were clear/sufficient/both/none of the above. Most respondents (55%) agreed that the requirements are sufficient, 14% of respondents felt the requirements are clear, 14% felt the requirements are both clear and sufficient, however 18% disagreed with either of the three options (Figure 4).

Comments acknowledged the complexity involved due to different types of rental agreements, lack of willingness of the owner to engage, and how the length of tenancies limit the ability to implement long-term outcomes. The consultation indicated that the requirements for contract farming/rental agreements within the LEAF Marque Standard are generally felt to be

Figure 4. Responses about whether requirements are clear for businesses with Rented Land / complex business structures
sufficient. Whilst there no amendments will be made to v16.0, this is an ongoing project that LEAF is addressing, with the aims of improving clarity.

12.0 Upgraded Control Points

All Recommended Control Points within the LEAF Marque Standard were reviewed for feasibility and whether they should remain as Recommended or be upgraded to Essential. The CPs that were upgraded to Essential were: 2.14, 3.20, 4.8, 5.12, 5.13, 7.4, and 8.27. CPs were deleted if their requirements were duplicated elsewhere in the Standard (2.8, 2.12, 3.15, 4.7, 7.5, 8.8, 8.15, 8.19, and 8.22). The survey asked whether respondents agreed with these changes. Over half of respondents (54%) agreed (43% were neutral, 3% disagreed) with the upgrading of CPs 2.14, 3.20, 4.8, 5.12, 5.13, 7.4 and 8.27 to Essential, aside from CP 2.14 (measuring soil health), concerns of which are addressed earlier in this synopsis. No critical issues were raised, and no further changes identified as necessary.

13.0 Increasing habitat area to 10% (Control Point 8.23)

The survey stated that the recommended CP 8.23 remains recommended but increases the habitat requirement to 10% and asked whether respondents agreed with this change. Overall, 41% agreed and 32% disagreed (Figure 5).

Comments from stakeholders were mixed; those in environmental industry/advisory roles tended to support increasing the % habitat area or suggested making it Essential, while those from farmers expressed concerns on feasibility. LEAF understands that this is not feasible across all situations and that there are barriers to all farmers being able to achieve this. The CP achieves the balance of promoting habitat area with feasibility; as a recommended CP, it does not affect certification. For clarity, the CP has been reworded to clarify the definition of habitat, to recognise that certain cropped areas are valuable for biodiversity (e.g., grazing species rich/semi-improved grassland) and that the habitat management is justified and informed by the Landscape and Nature Conservation and Enhancement Plan.

14.0 Training of individuals making PPP recommendations (Control Point 3.13)

The survey asked whether the stated eight hours as minimum amount of training or professional development per year is appropriate competency for making recommendations for PPPs. Respondents were asked whether they agreed/thought it should be more/thought should be less. Most respondents (82%) agreed that eight hours was the appropriate minimum amount of training/professional development. 14% thought it should be more and 5% thought it should be less (Figure 6.). Some comments expressed concern that it was not the place of LEAF Marque as a voluntary standard to stipulate this.
Given most stakeholders agreed and the feasibility and risks from the alternative suggestions, no further actions were identified.

15.0 Buffer Zones for Agrochemical Applications (Control Points 3.9, 3.20 and 3.21)

Respondents were asked whether the updates to CPs 3.9 and 3.20 (upgraded to Essential) and a new Recommended CP 3.21 (encouraging businesses to inform residential properties and the public of Plan Protection Products (PPP) application activities) increased international relevance and encouraged best practice. Overall respondents agreed with the changes (64%), 18% were neutral, and 18% disagreed with informing neighbours and the public of PPP application activities (Figure 7).

Concerns in comments included the feasibility of informing the public when timings are not easy to predict, and relevance to horticultural operations where PPPs applications are usually very targeted.

As a Recommended CP, this addresses feasibility and relevance risks, though ‘field’ was changed to ‘area’ to improve relevance to other contexts without fields. In addition, guidance on how to engage with the public will be published, and a glossary definition of what agrochemicals mean in the context of LEAF Marque has been developed.

16.0 Upgraded Control Points (2.14, 3.20, 4.8, 5.12, 5.13, 7.4, and 8.27)

All the recommended CPs within the LEAF Marque Standard were reviewed to assess their role and whether they should be upgraded to Essential. The surveys asked whether respondents agreed with upgrading the following CPs to Essential (2.14, 3.20, 4.8, 5.12, 5.13, 7.4, and 8.27). Over half of respondents (54%) agreed, 43% were neutral and 3% disagreed.

Overall respondents agreed with upgrading the CPs, so the changes will be introduced into the Standard v16.0 without amendment.

17.0 Formatting amendments verification icons and deletions

Overall, respondents agreed with proposed formatting amendments to the Standard, which include changing verification icons (77% agreed) and only including CPs deleted from v15.0 (90% agreed). This supports the changes to be made in v16.0.

The response to changing the order of CPs to be more logical (52% agreed, 38% were neutral, 10% disagreed) was mixed, and to ensure there is further research and due consideration of this topic, the change has been postponed to v17.0.
18.0 General Comments (unrelated to development projects)

This section highlights some feedback from general comments that are not directly related to development projects.

18.1 Crop Health and Protection

Suggestions were made to amend CPs in the Crop Health and Protection section to emphasise/prioritise non-chemical controls and stipulate whether PPPs are needed at all.

This approach was considered, however, as a non-organic Standard, the current referencing to PPP’s is appropriate, and the order of strategies should be prioritised based on those that are most effective. As a site-specific Standard, it is also important for growers to be able to prioritise strategies based on their own system and economic assessments. LEAF will review additional non-chemical strategies for inclusion in the LEAF Marque Standard v17.0.

18.2 Concerns over length of Standard and duplication with other requirements

A few comments expressed concern about the increasing length of the Standard, the resources and time required to produce documentation for audits and duplication of work across other Voluntary Sustainability Standards or requirements (e.g. SEDEX).

LEAF is aware of the challenges of administrative workload for farmers are considers this in development decisions. As a plan-based Standard, alternative strategies to enable a site-specific approach are being explored, and wherever possible, LEAF identifies opportunities to reduce duplication and/or collaborate with other organisations.

18.3 Reference to Vertical/Protected Cropping Systems

Some comments throughout the consultation highlighted that the CPs were not specific or relevant to vertical/hydroponics, high-tech, or protected cropping systems.

A review of CPs was carried out for v16.0 to help make the Standard more relevant to these types of systems. To ensure global relevance to wide-ranging systems, LEAF Marque avoids reference to specific systems except to highlight where necessary to ensure best practices.

This document is a synopsis of the comments received as part of the public consultation for LEAF Marque Standard v16.0 Draft. There were two surveys (short and detailed), and translations into five languages other than English. The results from all surveys were combined where possible. The synopsis refers to either/both surveys as relevant. If you provided feedback and you would like further explanation than provided in the summary above, please contact Jenna Higgins (jenna.higgins@leaf.eco) who will be happy to provide further detail on LEAF’s response to each specific comment received.