



LEAF Marque Version 13.0 of the LEAF Marque Global Standard – Standards Development

Report on first round of public consultation – April to May 2015

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1. Background

The LEAF Marque Global Standard is an established global environmental standard. Presently, it is reviewed on an annual basis and it is now undergoing its 13th revision. It is published on 1 October and comes into effect on 1 January 2016. The comments received shall be incorporated when applicable and LEAF Marque will a summary of how each comment has been addressed during the further processing of the draft LEAF Marque Global Standard. This summary will be available on the website.

New LEAF Marque control points are developed based on request, either from internal consultation from either the LEAF Marque Technical Advisory Committee (TAC) or LEAF Marque Working Group; or externally from producers or other interested stakeholders.

A second 30 day public comment period will commence in July to consider new control points and first round comments. The final LEAF Marque TAC is in September.

2. Working Group

A Working Group was established in 2012 following a request during the 10th version revision. Participants were invited on the basis of input into the first round of public consultation and/or their past engagement in dialogues about Integrated Farm Management (IFM) and certification.

The Working Group works closely with the Technical Advisory Committee to further develop the draft standards and guidance. The Working Group includes the participation of the 41 people representing 16 countries and 4 continents. They are from intergovernmental and nongovernmental organisations; academia; producers and producer organisations; certification organisations and 2 independent advisers.

TAC Members:

Paul Dracott, Chairman

Geoff Howe, Natural England

Sue Whittington, NSF-Certification

Lucy Bjorck, RSPB

Phil Goodliffe, Defra

Jim Egan, FWAG

Richard Baldwin, UKAS



Robin Levin, SAI Global Ltd
Jane Rickson, NSRI Cranfield University
Chris Reading, SAI Global Ltd
Gary Stoddart, SFQC
Jamie Letts, Environment Agency
Peter Harkett, Independent Agronomist
Ian Finlayson, PSI Advantage
Andy Mitchell Marks and Spencer
John Tzilivakis, Hertfordshire University
Belinda Bailey, Crop Protection Association
Richard Perkins, WWF

Support:

Jeremy Boxall, LEAF
Anthony Goggin, LEAF

3. This Report

The development of the LEAF Marque Standards System is underpinned by a process of stakeholder consultation and engagement.

The development of the LEAF Marque Global Standard is underpinned by a process of stakeholder consultation and engagement. LEAF Marque commits to:

- be open and transparent in its standards development process;
- encourage and facilitate input from a wide range of interested and affected parties;
- treat input from interested and affected parties with integrity and respect, and
- report publicly on submissions received, including how comments have been addressed in subsequent drafting.



This public report details the feedback received and how these have been addressed in the next draft.

4. Comments received from Working Group and through public comment process

Comments from the LEAF Marque Working Group on the development of the LM Global Standard

Audit fatigue	
<p>A year or so ago I did a comparison across my various audits (ACCS,AP,Nurtue,Leaf) to see which documents applied to all of them... I have attached it in case it is any use to you. It is slightly out of date. [see separate s/s with 90 plus 'audits' for a UK farm] RH</p>	<p>This farmer is obviously not one of the many supplying retailers (with circa 80% of everything we consume) OR understands how customers/retailers work.</p> <p>All the documents he cites are GAP and give customers in this every sceptical work confidence in what he is doing</p> <p>One of the quickest ways to get delisted as a supplier to any respectable and responsible customer is lack of technical confidence not price</p> <p>I suspect he (as most growers/farmers have) has lost sight of who and why all this paperwork was ENCOURAGED – UK top fruit growers after the Belgium Alar scare to pears (in the 80’s I believe) dreamt up a scheme that would give customers confidence in their growing system so the huge losses incurred by the Belgium could/should not occur here</p>
Financial / Social questions	
<p>Financial - I strongly believe if you start asking financial questions LEAF will be dead in the water.</p>	<p>Noted by the TAC</p>
<p>Financial - These are commercial businesses you are dealing with and any sort of financial information will be highly confidential and either not given, or not be worth the paper it is written on – I have been involved with grower group you are supposed to (for the benefit of the closed group) disclose production costs, yields etc. and I know most of the information given is not accurate. You then have the problems of defining what you want in the figures – take for example “rent per Ha” what happened to the farmer who owns the land, what figure does he include?</p>	<p>Noted by the TAC</p>
<p>Social – you could go down this route depending on what you are trying to achieve, one customer is already going down this route and are not getting the results they hoped for – I am very happy to be your spring board for ideas. JP</p>	<p>Noted by the TAC</p>
Other comments	

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<p>Jason Clay WWF - not a comment on the LEAF Marque system but to Standards in general</p>	
<p>What role do you see standards playing in this?</p>	
<p>Jason: If our goal is to double net food availability while freezing the footprint of producing food (e.g. using no more resources than we do today), then we need to measure what matters and then manage it. No certification program does this sufficiently today—most, in fact, are practice based, not performance based. Also, we can't measure everything. So, instead of hundreds of indicators, perhaps we could move the needle if we focused on 6-10. The point is to be effective, not comprehensive. Only a small number of issues represent 60-80% of the impacts we care about.</p>	<p>This also addresses the credibility of certification programs. They all imply that if you buy a certified product you will help reward better performance. But few collect or monitor the information needed to prove it. At best, they leave that to others to undertake after the fact and at costs that are not internalized. Whether the goal is improved social, environmental or income performance, each program has a responsibility to prove that production they certify is better for people, planet and profit.</p>
<p>Where a base scheme certification is required for LEAF why are base scheme requirements repeated in the LEAF Standard?</p>	<p>Noted by the TAC – the LEAF Marque Standard is a higher level scheme and is a requirement where some baseline schemes are minor musts or recommended.</p>
<p>The standard is becoming increasingly difficult to use and understand because of the amount of guidance it contains. Guidance should be written elsewhere.</p>	<p>Noted by the TAC – a more user friendly version will be developed</p>
<p>The various requirements made for birds are not matched by those made for mammals, and need to be rephrased to take into account conditions outside the UK.</p>	<p>Noted by the TAC</p>
<p>Should we have an Excel version of the LEAF standard for each new version, so we can edit a check-list in order to work on internal audits.... ?</p>	<p>Noted by the TAC</p>
<p>Revisions of the Standards occur too often so we have not enough time to get adapted before the next audit... ...there should be a document communicated as soon as possible with highlights of the changes that happened</p>	<p>Noted by the TAC</p>

The comments below have been, where appropriate, included in the second round consultation of the next draft of the Standard. Please see <http://www.leafuk.org/leaf/farmers/LEAFmarquecertification/LMresources.eb>

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Section or Control Points	Control Point Number - What / Why / or How?	Comment	Proposed Change - where possible, please suggest alternate text or a way to incorporate your suggestion- TAC comments in PURPLE
1.1	Have you completed a full LEAF Sustainable Farming Review (LSFR)?	The LSFR has no utility for PMOs and for enterprises hosting repeat audits	Complete an LSFR if you are a new entrant. It is a requirement for all PMOs each year.
1.2	Are you a certified full member of an appropriate assurance scheme for each enterprise on the farm? (if covered by a national assurance scheme and is appropriate in economic terms)	Robin's suggestion of wording re a National baseline scheme would be more appropriate.	There are many schemes that are not benchmarked to GLOBALG.A.P. so use of a phrase like 'a baseline scheme (that has been agreed with LEAF)' may be more practically workable. Of course the preferred route may well remain as GLOBALG.A.P. and benchmark. RTA Fresh Produce v3.0 is not benchmarked to GG v4. The 'resembling status' documentation from GG clearly stated v2.0 and as such after 1st Oct it is no longer of 'resembling status'. There are plans to re benchmark but it probably won't be until GG is revised and implemented in 2015. Robin's suggestion of wording re a National baseline scheme would be more appropriate.
1.4	Have you completed and or updated the LEAF Marque Warranty Chain Agreement for the current year?	This needs to be reworded etc to include the new LEAF Marque Chain of Custody	In process
1.5 (R)	Is all produce registered in the Warranty Chain Agreement, in the products you sell or are despatched from the farm, intentionally segregated and identifiable to the end customer as LEAF Marque certified and show the LEAF Marque certificate Number?	This needs to be reworded etc to include the new LEAF Marque Chain of Custody	In process
1.5 (R)		Products in the Warranty Chain not sold as LEAF do not need identification nor segregation	TAC agreed that they do – it is also has a marketing element to it
1.6	Do you have a Farm Environmental Policy?	The requirement for the policy to be documented is repeated	It must be relevant to the company's activities and be documented. Agree revision
1.7	Do you have a documented plan setting out your short and long-term environmental objectives?	Should waste minimisation / recycling be specifically mentioned for inclusion in the Farm Environmental Plan?	Review comments in light of other areas of waste in the Standard.

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1.8	As part of the plan, are targets set to improve and enhance the environment?	"...but must also include targets on energy, water, soil, air, "greenhouse gas" (GHG) mitigation." Does not make sense. How can water targets be mitigated?	...include targets for minimal utilisation of (energy etc.) where required. Interpretation issue here look at CP for clarity.
1.8		As1.7 above, should waste / recycling be mentioned.	This is mentioned elsewhere in the Standard.
1.10	Is the Farm Environmental Policy signed and understood by permanent members of staff?	Why does this not apply to temporary staff as well? Aspects of the Farm Environment Plan should be communicated to temporary staff e.g. harvest students. It is important that casual staff are made aware of environmentally sensitive areas on the farm, location of stewardship scheme options etc.	Look at whole CP – it does cover this off in the public placement of the EP.
1.10		Requirement to sign document repeated	All permanent staff to sign document - Review
1.12	When purchasing new equipment or designing new buildings do you look for water and energy efficient products / designs?	Products that do not use water cannot be water efficient	This should include water and energy efficient products / designs where appropriate. Review wording / meaning as appropriate.
1.12		Should there be a comment to the effect of considering the incorporation of renewable energy generation into the building design e.g. solar panels on the roof or renewable forms of heating.	Review e.g. renewable energy
1.13	Do you clearly identify and document market outlets and requirements for your products prior to production, and integrate this within your enterprise planning process?	Where supermarkets do not give contracts to suppliers, and place orders after manufacturing has started, this is not possible for some producer groups	Qualify by stating "where appropriate" Are you doing everything in your power to mitigate waste in the supply chain?
1.15	Do you give regular training or awareness events to relevant staff on the principles and practices of Integrated Farm Management (IFM)?	Incorrect English	Farm staff who have...Farm staff that have a critical impact on your business Review
2.9	Are recommendations for application of fertilisers (organic or inorganic) given by competent, qualified persons	Does "qualified" need to be defined more clearly e.g. BASIS FACTS? Qualified could just mean simply that someone has been shown by a third party and is this enough for sustainable farming?	It is assumed that to be efficient with resources then the farm business would only employ such a competent person

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2.12 (R)	Do you measure your nitrogen efficiency per tonne of product?	we can observe that the same levels of standards whatever the product type : sometimes it can be quite easy to achieve a control point for a type of production (for example cereal crops), whereas for other crops (such as fresh fruit and vegetables) it can be much harder and needs a lot of work for the grower	Nitrogen is the most 'energy hungry' nutrient in terms of its LCA of production. We need to reduce reliance of synthetic N. N diffuse pollution has a big effect on the environment too. We are asking farmers to 'measure what matters' but we could extend this to other nutrients in the future.
2.12		no interest to re-enter datas related to water use or nitroegen on the website every year (myleaf questionnaires)- the grower cannot spend his time filling in forms	Documents and records already in place on farm should be sufficient. Is this a future challenge for the metrics? Are the producers using the required LEAF Marque information to guide their management?
3.11	Do you record all plant protection product applications?	Can this be removed? What about spraying through fleece material	Have all the baseline systems caught up on this – can it be removed? No. Justification of use. Resistance strategy.
3.18	Do you only use and store plant protection products that have approval?	Should LEAF have an approved list?	What about banned products? Risk 'v' Hazard. What about formulations and 'cocktails' in the tank? What about change of use for a product? Ongoing LEAF discussion and ISEAL.
4.7 (R)	Do you visually monitor and record the quality and condition of drainage ditches and watercourses around your farm, especially after recent field operations on a regular / quarterly basis and have an action plan to deal with issues?	auditors ask for written documents to justify every action - the grower cannot spend his time filling in forms	Communication with the grower on how he manages his farm and visual evidence should be enough. Should we give a preface to some CPs to bring context and rationale to what the CP is asking? Is it about water quality / condition?
5.1	Do you take measures to avoid undue grazing damage leading to soil erosion and runoff?	What about graziers?	This is related to the CP on communication of the Environmental Policy to all who have an input on the farm e.g. including graziers.
5.9	Do you monitor indicators of animal welfare and assess their cycle by cycle performance?	Is there a better definition for 'cycle by cycle'?	"On a production cycle basis" Does LEAF have any indicators? It is a complex measurement as there are so many contexts and variables.
6.2	Do you monitor energy consumption?	How do you account for contractors' use?	Is the true energy used across the farm recorded? What about the LCA? What is the scope of total energy used? What does the producer do with the information? This section needs a thorough review going forward.

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7.1	Have you completed a Water Management Plan for the whole farm?	Some farms use only rainwater.	As in 6.1 there should be a reduced requirement for a low water user. It still needs a management plan.
7.3	Do you measure the water efficiency of your irrigated crops?		Documents and records already in place on farm should be sufficient. It will be another Metric requirement in the LEAF Sustainable Farming Review.
7.4 (R)	Do you take account and analyse your water efficiency measurements, justify any change and plan to implement practices to improve water efficiency?	Some farms use only rainwater.	See 7.1 It still needs to be mentioned in the management plan.
7.5	Are you increasing your percentage of stored water from periods of natural rainfall abundance over direct abstraction and developing rainwater harvesting and water reuse opportunities on an annual basis?	Some farms use only rainwater. Should this also have a N/A reference?	See 7.1 Noted
8.5 (R)	Do you ensure that tenants that rent land from the certified business manage the land in a way that protects and enhances the environment?	Incorrect English	Do you ensure that tenants who rent land... Noted
8,8 , 8,16, 8,20	Do you restrict the timing and frequency of field / boundary management such as hedge cutting? Do you use native and or appropriate species if seeding field margins and other habitats? Do you adjust field operations to avoid nesting birds?	Auditors ask for written documents to justify every action - the grower cannot spend his time filling in forms	Communication with the grower on how he manages his farm and visual evidence should be enough. It is in the LNCEP and will need to be seen in practice.

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8.24	(Upgraded to CFP) Do you provide nesting habitat, summer food and winter food for farmland birds or carry out other activities to enhance the habitat for native fauna?	Does this control point allow supplementary grain feeding, as per ELS / HLS options EF23 / HF24? Supplementary feeding is not easy to police (ELS / HLS requires a diary and receipts), but by all accounts there are some very tangible benefits, especially where wild bird seed plots have run out of steam or when there is prolonged snow cover. It would replace the former major seed source for birds over the winter - grain heaps and open corn bins - which are now sealed away from birds by the hygiene regulations. A simple minimum 'menu' of cereals (including 'tail corn' which the chickens on one of the farms where I worked seemed to thrive on!) and OSR (for the UK at least) - and even [in the right location] dressed-out weed seeds - would be relatively cheap from the farmer's viewpoint (ELS / HLS requires millet etc. which has to be bought in at significant cost). If supplementary feeding is an acceptable part of this control point, should it be as an ADDITIONAL winter food source? Should it be optional or compulsory? Should the amount be linked to farm size, or as much or as little as the farm feels appropriate? A weekly photographic 'diary' could be the 'Evidence'. This all needs thought, but could be very beneficial if approved.	<p>Some of section 8 CPs need to be quantified – How much is enough? What about key species? Year round provision to resource the 'hungry gap'. This section needs a complete reworking in some place going forward since we need to accommodate generic guidance with local interpretation and guidance for auditors.</p> <p>What are the BIG THREE for all species? Food & Fuel, Territory and Shelter</p> <p>The 'Big 3' for bees and other pollinators are: Seasonal food (nectar and pollen), Shelter and Foraging sites.</p> <p>Will the Simply Sustainable Biodiversity brochure be able to help? Bird Life International have indicators. Area 'V' Quality What about unintended consequences?</p>
8.25	(Upgraded to CFP) Are bees and pollinators part of your key species in the Landscape and Nature Conservation and Enhancement Plan?	Pineapples do not rely on pollination	Modify to state "where appropriate" But other plants might within the farmed area.
9.1	Can you demonstrate any evidence of regular communication and participation with local community initiatives planned or under way to communicate a balanced and positive approach to farming?	There should not be a requirement to promote LEAF in the LEAF standard	Remove. No justification to remove this CP