



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

Report on second round of public consultation – July to August 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.

The next LEAF Marque TAC is in September 2015.

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	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
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Robin Levin, SAI Global Ltd Jane Rickson, NSRI Cranfield University Chris Reading, SAI Global Ltd Gary Stoddart, SFQC	Support: Jeremy Boxall, LEAF Anthony Goggin, LEAF
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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

Following the Second round consultation, a second draft of the LEAF Marque Global Standard version 13.0 was submitted to the LEAF Marque TAC to review the following—Progress report:

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>

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. The LEAF Sustainable Farming Review is an important resource as it helps business to consider (on an annual basis or more often) their commitment to sustainability. It is a source of up to date information and can provide action points to help with the efficient management of the farm. It helps LEAF to see how IFM is being

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			implemented and it can be a useful analysis tool to report on impact.
1.5	Warranty Chain	Products in the Warranty Chain not sold as LEAF do not need identification nor segregation.	The new Chain of Custody will embrace all issues surrounding segregation and LEAF Marque logo application etc.
1.6	Environmental Policy	The environment policy should not only be documented but also strategically displayed for anyone in the premise to see and be aware of.	Noted
1.10	Environmental Policy	All staff should be communicated to and sign a mark (environment policy) c) A variety of comments on the Standard which endorsed the control points. 1.10 All suppliers and subcontractor should have their contracts have a commitment to environment conservation. Whilst the Standard can influence others informally, it cannot demand change of practice for various reasons, not least that it would be very difficult to audit. The farm has control over those who work on it i.e. staff and contractors.	Noted
1.11	Environmental Policy	All suppliers and subcontractor should have their contracts have a commitment to environment conservation	Noted
1.18	New Chain of Custody	For entities that handle products and not producers should have a brief chain of custody standard relevant to such operations	Noted
1.18 – 1.20	New CPs concerning the Chain of Custody.	Can we change ‘annual basis’ in 1.18 guidance to each year?	Noted
2.6	Cropping Cycle	What about for flowers for cropping cycle what is expected since they are uprooted after a long period of time?	This is in the guidance for the CP. It applies also to perennial crops such as orchards and can be justified by the producer.
2.13	Do you measure your nitrogen efficiency per tonne of product?	Can we collect this data via the LEAF Sustainable Farming Review Metric?	Yes - Noted

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1.2	Producer Groups	As in the current version and despite in LEAF (point 1.2) producer are requested to be certified GLOBALG.A.P.	Noted
1.14,1.17,2.1*,2.3,2.8,2.9,2.10,2.11,2.13,3.2,3.3,3.4,3.6*,3.7*,3.8,3.10,3.11,3.13,3.15,3.16,3.17,3.18,3.19,4.1,4.2,4.4,5.3,7.1*,8.2*,8.3	Duplicate points?	(*) Points in which I consider LEAF requirements are a bit clearer and deep that in GLOBALG.A.P.	Noted – minor musts are not always as robust as LEAF Marque CFPs.
4?	Pollution control	My only suggestion for improvement is perhaps asking the question “has the site been involved in any pollution incidents in the last 12 months” LEAF is all about what is being done (that is good) to protect the environment, so should a grower who has been involved in a pollution incident (and they have to be quite severe to even get detected) even be a LEAF member?	Noted
6.1	Energy Efficiency	How do we define efficiency?	Noted - a clearer definition will be added to the control point. New revised Energy Spreadsheet.
7.1	Water Management Plan	Some farms use only rainwater. If the only source of water is rainfall how is a WMP relevant?	IFM is about how you manage in an integrated way so it relates to e.g. soil impacts as well. Water conservation issues – water is a limiting resource for the survival of the crop. The evidence required is for a plan and the producer for justification; ‘Check Water Management Plan and its implementation as well as sustainability of the source. Justification of practices must be recorded as part of the plan.’ The control point could be expanded to have 3 or 4 control points and there are synergies with the soil management plan. Noted
7.3	Water Use Efficiency	How will this be recorded?	New revised LEAF Sustainable Farming Review data entry on Applied Water Use Efficiency to go there. Noted
8.25	“Are bees and pollinators part of your key species in the Landscape and Nature Conservation and Enhancement Plan?”	Pineapples do not rely on pollination. But pollinators are an essential part of biodiversity and they are to be encouraged for the non-cropped flora and other farms’ pollination. Bees are also a farmed insect.	Noted – but it does apply to all crops and pollinators will be important to other producers.

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<p>9.1</p>	<p>“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?” The CP guidance states, “It is very important to promote and inform interested parties of activities on the farm, and encourage feedback on how your business is perceived and what LEAF Marque and Integrated Farm Management means for consumers.” It is in 3 parts.</p>	<p>There should not be a requirement to promote LEAF in the LEAF standard. LEAF Marque producers should not be required to proselytise their neighbours. Should we take out reference to ‘LEAF Marque’ and ‘promote’ and exchange it with sustainable farming? Farmers are not promoting sustainable farming, they are promoting their whole business and sustainability is one aspect of their business ethos.</p>	<p>Being a good neighbour was esteemed by the TAC and it is mentioned elsewhere in the Standard e.g. Crop Protection. The section heading for this is Community Engagement. It is also a part of knowledge exchange from the farm to the local community. Is promotion the same as engagement? Noted. ACTION: In the guidance, take out reference to LEAF and ‘promote’ and exchange it with sustainable farming.</p>
<p>General</p>	<p>Should LEAF Marque adopt the Audit protocol of recording (non-compliance) good practice when it is seen by the auditor?</p>	<p>There is also a requirement from other standard systems to ‘promote’ their organisation.</p>	<p>Noted.</p>