



Standard for Medium and Large Farms

1. General recommendations

TOPIC	GENERAL RECOMMENDATION
Assurance / management system	<ul style="list-style-type: none"> • Specify assurance system in order to ensure independency between Abs, CBs, consultants and producers • RA should create transparency on cost coverage regarding the management system and the implementation of requirements. • There should be a minimum price in order to ensure cost coverage. • The premium setting procedure needs to be specified.
Risk management	<ul style="list-style-type: none"> • Specify methodological approach to risk management on banana producing countries and elements of risk management / periodicity. Ensure a reliable comparison between countries.
Modern slavery and corruption	<ul style="list-style-type: none"> • Topics of corruption and modern slavery and corruption should be covered in the document in that a clear ban in RA-certified farms is stated.
Outcomes and impact	<ul style="list-style-type: none"> • Outcomes and impact should also be related to climate change (missing in list)
Lack of producer empowerment, no pro-poor-focus	<ul style="list-style-type: none"> • Include more development aspects in approach for instance for producer empowerment / pro-poor-focus (e.g. income improvement, structural improvements, considering needs/demands of poor) • Strengthen to mandatory improvement criteria (1.4.x)
Indicator Data	<ul style="list-style-type: none"> • Clarify who implements capacity building and who covers its costs.



2. Specific recommendations

INDICATOR	TOPIC	RECOMMENDATION
1.3.1/1.3.2	Internal inspections and risk assessments	<ul style="list-style-type: none"> The required training course on good internal inspection practices needs to be organized by RA (and not by group management) in order to ensure a high quality of trainings and the highest possible quality of internal inspections.
1.3.5	Internal inspections and risk assessments	<ul style="list-style-type: none"> It is difficult to perform a good quality risk assessment on all proposed topics. Therefore, create a guidance with minimal requirements on these risk assessments.
1.4.2	Management plan and service delivery	<ul style="list-style-type: none"> The quality of the provided services such as the trainings needs to be ensured. Therefore, RA needs to define a mechanism or indicators that can indicate a sufficient quality of the services.
1.9.	Premium	<ul style="list-style-type: none"> A purely negotiated premium without a reference price would possibly result in negligible premiums. Therefore, we propose to define minimum prices based on a transparent methodology in order to have a solid database for setting the premiums. It is imperative that the premium is covering the producers' needs and not the needs of others.
2.1.2	Planting and rotation	<ul style="list-style-type: none"> Farming requirements for planting, rotation, as well as pruning and renovation of crop trees need to be core requirements not only for medium to large farms but also for the group managements of the producers. (regards 2.1.2, 2.1.3, 2.2.1, 2.2.2)
2.4	Soil fertility and conservation	<ul style="list-style-type: none"> A criterion on the preferable usage of organic fertilizers is missing. Therefore, the mandatory improvement needs to be included: changing the ratio of usage of organic fertilizers vs chemical fertilizers towards a higher use of organic fertilizers.
2.4.4	Soil fertility and conservation	<ul style="list-style-type: none"> There are many methods for soil analysis. RA should provide a list of recommendations with accepted methods for the soil tests.



		<ul style="list-style-type: none"> Also, yearly soil tests are hardly feasible and expensive. Therefore, the yearly soil test should include a subset of testing parameters and an extensive analysis with all necessary parameters should be applied every 3 years.
2.4.6	Soil fertility and conservation	<ul style="list-style-type: none"> RA needs to provide a guideline on when each crop needs which nutrient.
2.4.7	Soil fertility and conservation	<ul style="list-style-type: none"> The mandatory improvement should aim for reducing the use of synthetic fertilizers, not only optimizing it.
2.4.7	Soil fertility and conservation	<ul style="list-style-type: none"> Additional smart meter: Increase of organic fertilizer (Kgs organic fertilizer per kg of product)
2.5.1	Integrated Pest Management (IPM)	<ul style="list-style-type: none"> Agrochemical records should also document date, active substance, amount applied as well as the person who applied it.
2.5.2	Integrated Pest Management (IPM)	<ul style="list-style-type: none"> Guidelines and trainings on monitoring techniques need to be provided. E.g. monitoring with permanent sticky traps need to be banned.
2.5.3	Integrated Pest Management (IPM)	<ul style="list-style-type: none"> Calendar spraying should be the least preferred option; therefore, RA needs to clarify which “research or substantiated technical recommendations” are sufficient for allowing calendar spraying.
2.5.4	Integrated Pest Management (IPM)	<ul style="list-style-type: none"> Rotate pesticides. To avoid resistances make sure you rotate not only pesticide products but also the active ingredients. Whenever resistances of a pest of disease against a specific active ingredient are starting to show, emphasize the rotation of active ingredients even more and develop alternative measures to counteract the pest/ disease/ weed.
2.6.X	Agrochemicals management	<ul style="list-style-type: none"> Rainforest Alliance Prohibited List needs termination for active ingredients in every single case; in some cases chemically very similar active ingredients could be pooled (e.g. all neonicotinoids).
2.6.5	Agrochemicals management	<ul style="list-style-type: none"> RA should support the preparation and application of agrochemicals based on own experiences and - in the future - based on benchmarks of RA certified farms.
2.6.6	Agrochemicals management	<ul style="list-style-type: none"> Minimum size /width of buffer zones (non-application zones) needs to be defined. Proposal: at least 10 % more than the nationally legal requirement



2.6.7	Agrochemicals management	<ul style="list-style-type: none"> Specify how the surplus mix of the agrochemicals of aerial application should be disposed.
2.6.7	Agrochemicals management	<ul style="list-style-type: none"> Prohibition of pesticide application by aerial spraying as mandatory improvement.
2.6.12	Agrochemicals management	<ul style="list-style-type: none"> Proposal to change wording to: “Empty agrochemical containers are disposed of through a collection and recycling program or through another safe way and containers should be brought to a waste deposit in safe conditions.”
3.X	Assess and address discrimination, forced labor, child labor, workplace harassment and violence	<ul style="list-style-type: none"> We propose to include a mandatory improvement on abolishing child labor. We also propose to include a core requirement that demands capacity building/trainings that support the awareness raising activities. The only solution to child labor is a minimum price, which RA should adopt as well.
3.1.1	Assess and address discrimination, forced labor, child labor, workplace harassment and violence	<ul style="list-style-type: none"> The appointed person / committee should also be accountable for freedom of association and for the right for collective bargaining.
3.2.	Freedom of association and collective bargaining	<ul style="list-style-type: none"> Integrate a method to ensure that producers are supported (e.g. by buyers, RA, governmental agencies, non-governmental organizations) for successfully applying the “assess and address” model.
3.3.	Wages and contracts	<ul style="list-style-type: none"> Workers receive at least the applicable minimum wage, a country or sector floor wage above relative poverty level, or the wage negotiated in a Collective Bargaining Agreement, whichever is highest.
3.3.1.	Wages and contracts	<ul style="list-style-type: none"> Written contracts should be the standard for long-term employees. Verbal agreements can only be acceptable for short-term employees.
3.4.3	Living wage	<ul style="list-style-type: none"> Include a clearly defined method that guarantees wage increases independent of meeting a living wage. If a living wage is met or not should not be the goal, but a milestone for progressing wages. Substantially increasing wages on a yearly basis should be the goal.



3.6.	Health and safety	<ul style="list-style-type: none"> Occupational Health and Safety Programs have been quite beneficial for the producers. Therefore, we suggest including an extensive OHS program as core requirement. RA would have to define such a program based on best practices and experiences.
3.6.10	Health and safety	<ul style="list-style-type: none"> It needs to be emphasized who is covering the costs of the medical examination. This can be e.g. the employer, a health insurance or RA. The employees must not cover these costs.
4.1.1.	Forests, other natural ecosystems and protected area	<ul style="list-style-type: none"> The Cut-Off date needs to be January 1st 2008.
4.2	Conservation and enhancement of natural ecosystems and native vegetation	<ul style="list-style-type: none"> The conservation criteria need to be framed within a "Biodiversity Action Plan" or "Nature Conservation Action Plan". In this plan, all following aspects should be considered: <ul style="list-style-type: none"> - Baseline - Improvement measures - Monitoring With a documented planification, it would be easier to proof continuous improvement. In addition, connection of natural or semi-natural ecosystems /habitats should be included (= biotope corridors). The Biodiversity Action Plan could be part of the general Management Plan.
4.2.1	Conservation and enhancement of natural ecosystems and native vegetation	<ul style="list-style-type: none"> Not only fully natural ecosystems should be conserved, but also semi-natural habitats. A clear definition for the systems that should be conserved needs to be included.
4.2.2	Conservation and enhancement of natural ecosystems and native vegetation	<ul style="list-style-type: none"> HCV assessment needs to take place also in the surroundings of the farms.
4.2.3	Conservation and enhancement of natural ecosystems and native vegetation	<ul style="list-style-type: none"> RA requests now 10 % total native vegetation cover. However, native vegetation and habitats do not have necessarily the same quality and value. Example: Native vegetation could also be a monoculture forest. Therefore,



		instead of at least 10% total native vegetation cover; RA should require at least 10% of natural and semi-natural habitats.
4.3.1	Riparian buffer and chemical non-application zones	<ul style="list-style-type: none"> RA should define quality criteria for buffer zones such as cover with native vegetation, minimum width of 10 meters.
4.3.2	Riparian buffer and chemical non-application zones	<ul style="list-style-type: none"> Mention of “aquatic systems” is double with requirement 4.3.1 for aquatic systems.
4.4.4	Protection of wildlife and biodiversity	<ul style="list-style-type: none"> Include also a core requirement on ensuring animal welfare for farm animals used for work such as horses, donkeys etc.
4.4.6	Protection of wildlife and biodiversity	<ul style="list-style-type: none"> Mandatory improvement measure needs to include that Nature Conservation Authority should be informed about presence of invasive species on the farm and should be consulted regarding appropriate measure to contain and reduce invasive species.
4.5	Water conservation	<ul style="list-style-type: none"> Additional core requirement: The farm operator uses an irrigation sheet to document the water used for each irrigation activity.
4.5	Water conservation	<ul style="list-style-type: none"> Additional mandatory improvement requirement: The request to be informed /participate in local or regional watershed management systems focusing on the sustainable use of water resources. If no local or regional watershed management is in place, a regular information exchange with regional NGOs /experts on sustainable watershed management should be documented.
4.5.2	Water conservation	<ul style="list-style-type: none"> The design of new irrigation and processing systems needs to consider as well the risk analysis if crops are adaptable to climate change impacts. The preference should be put on less water usage.
4.5.3	Water conservation	<ul style="list-style-type: none"> Proposal for rephrasing to: “... and minimize water waste, erosion and salinization as well as avoid damaging aquatic ecosystems such as lakes, wetlands and rivers.”
4.6.2	Wastewater and water quality	<ul style="list-style-type: none"> Include a mandatory improvement criterion with the same requirements regarding wastewater for established operations. This would allow operations to have 3 years to adapt and fulfil the requirements.
4.6.4-5	Wastewater and water quality	<ul style="list-style-type: none"> Recycling and reuse must be a mandatory improvement.



4.7.1	Waste management	<ul style="list-style-type: none">• To improve the waste handling, following mandatory improvement requirement is proposed: Farm operators should agree with producers of chemical products and other hazardous products to take containers and waste back and make sure that it is disposed in an appropriate and safe way.
4.7.3-4	Waste management	<ul style="list-style-type: none">• Recycling and reuse must be a mandatory improvement.
4.8.	Energy efficiency	<ul style="list-style-type: none">• Given the sizeable volume of GHG that are emitted through agricultural activities, energy efficiency needs to be mandatory. Therefore, we propose to make the requirement 4.8.1 a mandatory improvement.
4.9.1	Greenhous gases reduction	<ul style="list-style-type: none">• RA needs to provide mandatory guidelines how to calculate the carbon footprint.



Standard for Smallholders

1. General recommendations

TOPIC	GENERAL RECOMMENDATION
Assurance / management system	<ul style="list-style-type: none">• Specify assurance system in order to ensure independency between Abs, CBs, consultants and producers.• RA should create transparency on cost coverage regarding the management system and the implementation of requirements.• There should be a minimum price in order to ensure cost coverage.• The premium setting procedure needs to be specified.
Risk management	<ul style="list-style-type: none">• Specify the methodological approach to risk management on banana producing countries and elements of risk management / periodicity. Ensure a reliable comparison between countries.
Child schooling	<ul style="list-style-type: none">• School-age children, living on-site should attend school. Similar criteria as 3.7.2 in the medium to large farm standard needs to be included in the smallholder standard.
Living income	<ul style="list-style-type: none">• The principle of continuous improvement towards living income should also be applied for the standard for smallholders.
Modern slavery and corruption	<ul style="list-style-type: none">• Topics of corruption and modern slavery should be covered in the document which states a clear ban in RA-certified farms



2. Specific recommendations

INDICATOR	TOPIC	RECOMMENDATION
1.2.1	Group member administration	<ul style="list-style-type: none"> • Make reality-check on farm: randomly sample group members for verifying registered information that is stored in the groups' registry.
1.4.	Management plan and service delivery	<ul style="list-style-type: none"> • Concrete possible actions: minimum price, premium price, sponsoring • It needs to be guaranteed that the group management supports group members in enabling them in various dimensions (e.g. financial management, diversification techniques). Therefore, requirements 1.4.5-1.4.7 need to become mandatory improvements.
1.6.1	Gender equality	<ul style="list-style-type: none"> • Define the methodology and content of the gender assessment and ensure that the implementation is feasible.
2.4.6 AND 2.4.7	Soil fertility and conservation	<ul style="list-style-type: none"> • Correct application of fertilizers is vital for ecological and economic sustainability of the farms. Therefore, improvements 2.4.6 and 2.4.7 need to become core requirements.
2.6.3	Agrochemicals management	<ul style="list-style-type: none"> • The documentation of safety information for agrochemicals and the understanding of their handling is mandatory for health considerations. It needs to be guaranteed by RA that safety information is available in local languages and not only in the official languages.
2.6.4	Agrochemicals management	<ul style="list-style-type: none"> • Ensure that the application of the requirements is at all practicable, hence, that the facilities are accessible and workers are encouraged to use them (especially showering and changing clothes after handling agrochemicals).
2.6.5	Agrochemicals management	<ul style="list-style-type: none"> • Specify how the information should be shared with affected persons and communities and include a mechanism that ensures the continued sharing of information.
3.5.3	Working conditions	<ul style="list-style-type: none"> • Define "room for breastfeeding"! Specify the realistic implementation that will ensure an appropriate place for breastfeeding (e.g. concrete structure or other protected space)



3.6.11	Health & Safety	<ul style="list-style-type: none">• Access to first aid is a necessity for safe work places; therefore, 3.6.11 needs to be a core requirement instead of a mandatory improvement.
4.1.1	Forests, other natural ecosystems and protected area	<ul style="list-style-type: none">• Define the process that can reliably identify if smallholder farmers meet the cut-off date.
4.7.2	Waste management	<ul style="list-style-type: none">• Define the acceptable options of “incinerators technically designed for the specific waste type”.



Chain of Custody Standard

2. General recommendations

TOPIC	GENERAL RECOMMENDATION
Assurance / management system	<ul style="list-style-type: none"> Specify assurance system in order to ensure independency between Abs, CBs, consultants and producers RA should create transparency on cost coverage regarding the management system and the implementation of requirements. There should be a minimum price in order to ensure cost coverage. The premium setting procedure needs to be specified.
Living income/wages in chain of custody standard	<ul style="list-style-type: none"> Chain of Custody Standard should include criteria on shared responsibility for living wages / income on the producer level but also in the supply chain.
Due diligence	<ul style="list-style-type: none"> Buyers/clients requesting human rights due diligence structures and procedures should be required to enter into a cost sharing dialog

2. Specific recommendations

INDICATOR	TOPIC	RECOMMENDATION
3.1.6	Traceability at operating level	<ul style="list-style-type: none"> Specify “any schemes”. It needs to be ensured that double certification such as GlobalG.A.P. and RA certification is not mutually exclusive.



Further recommendations

TOPIC	RECOMMENDATION
Glossary definitions	Complete glossary in order to enable quality implementation of standards (reference sources could be IUCN or CIFOR and others)