

THE CONSUMER GOODS FORUM

Sustainable Supply Chain Initiative | Environmental Benchmark Criteria | Comments Received from Stakeholders/Public Consultation | April-May, 2024

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● Foreword

The Sustainable Supply Chain Initiative recently conducted stakeholder consultation involving representatives from diverse sectors, including scheme owners, international and industry experts, associations, NGOs, and academics. This consultation specifically focused on the draft Environmental Benchmark Criteria for all scopes, including Manufacturing & Processing, Primary Production, and Forestry. Additionally, the requirements for Scheme Management were updated to adapt the criteria for environmental purposes and to align social & environmental auditors' competence.

This document serves as a compilation of all the valuable input received during the public consultation phase that took place in April and May 2024.

The feedback and comments received during this consultation were thoroughly reviewed and discussed within the SSCI Environmental Working Group (members listed below). Additionally, an external consultant was engaged to provide their expertise in this process. The outcomes of these discussions are documented in this report, which is accessible for your reference.

The report is organised into themed chapters, each containing specific criteria. The comments received have been categorised and consolidated under their respective associated specific criterion, including the original text, the comment received, the SSCI response and the final text.

The SSCI team is thankful for all the comments received and the high-level discussion during the public consultation. Your valuable input and engagement are crucial in helping us refine and improve our standards.

For further details on the consultation process, please visit the dedicated page [SSCI Public Consultation](#). If you have any questions or require additional information, please do not hesitate to reach out to the CGF SSCI Team at ssci@theconsumergoodsforum.com.



Luiza Reguse - SSCI Senior Manager

SSCI Environmental Working Group Members

Tamara Muruetagoiena, Chair	International Fresh Produce Association
Rita Bielinski	Land O’Lakes
Jessica Meisinger	MSD Animal Health
Janis McIntosh	Naturipe Farms

Public Consultation

Stakeholders invited to the consultation

Canadian Produce Marketing Association (CPMA)	Association
CGF Forest Positive Coalition - Paper, Pulp and Fibre Packaging Working Group	Business Association
CGF Net Zero Coalition	Business Association
German Agency for International Cooperation (GIZ)	Government Agency
German Institute for Standardization (DIN)	NGO
Global Sustainable Seafood Initiative (GSSI)	NGO
International Social and Environmental Accreditation and Labelling Alliance (ISEAL)	NGO

International Trade Center (ITC)	NGO
National Organic Program (NOP USA)	Government Agency
Organisation for Economic Co-operation and Development (OECD)	NGO
The Sustainable Trade Initiative (IDH)	NGO
UN Environment	NGO
UN Forum on Sustainability Standards (UNFSS)	NGO
United States Environmental Protection Agency (EPA)	Government Agency
World Wildlife Fund (WWF)	NGO

Third-party Audit, Certification Standards & Certification Bodies invited to the consultation

- Control Union
- Ecocert Group
- Fair Trade International
- Fair Trade USA
- Forest Stewardship Council (FSC)
- Global G.A.P

Programme for the Endorsement of Forest Certification (PEFC)

Rainforest Alliance

Regenerative Organic Certified (ROA)

Roundtable on Sustainable Palm Oil (RSPO)

Scientific Certification Systems Global (SCS Global)

Sustainable Food Group (IPM Institute)

Sustainable Forestry Initiative (SFI)

Sustainable Rice Platform

The European Feed Manufacturers' Federation (FEFAC)

Stakeholders who answered the consultation

Canadian Produce Marketing Association (CPMA)

CGF Forest Positive Coalition - Paper, Pulp and Fibre
Packaging Working Group

CGF Net Zero Coalition

International Federation for Produce Standards (IFPS)

Kenvue Inc.

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Ministry of Natural Resources and Forests, Ontario, Canada

Programme for the Endorsement of Forest Certification (PEFC)

Sustainable Food Group (SFG)

Sustainable Forestry Initiative (SFI)

Part II Scheme Management Requirements

● A1. Scheme Governance

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
A1.01 The Scheme Owner shall be an organisation that is a legal entity, which could be held legally responsible for the schemes' operations.	No comments received	N/A	The Scheme Owner shall be an organisation that is a legal entity, which could be held legally responsible for the schemes' operations.
A1.02 The Scheme Owner shall have adequate policies and procedures to ensure impartiality between the scheme management and auditing activities. If the scheme is managed in part or in whole by an audit firm or a group of audit firms, the scheme owner shall require that the audit firm(s) are accredited to ISO/IEC 17065 or ISO/IEC 17021-1 related to the scope of certification, and only allow accredited audit firms to operate their schemes, to ensure impartiality between the scheme management and auditing activities.	No comments received	N/A	The Scheme Owner shall have adequate policies and procedures to ensure impartiality between the scheme management and auditing activities. If the scheme is managed in part or in whole by an audit firm or a group of audit firms, the scheme owner shall require that the audit firm(s) are accredited to ISO/IEC 17065 or ISO/IEC 17021-1 related to the scope of certification, and only allow accredited audit firms to operate their schemes, to ensure impartiality between the scheme management and auditing activities.
A1.03 The Scheme Owner shall have adequate arrangements to cover liabilities arising from its operations.	No comments received	N/A	The Scheme Owner shall have adequate arrangements to cover liabilities arising from its operations.
A1.04 The Scheme Owner operates to a documented set of governance policies and	No comments received	N/A	The Scheme Owner operates to a documented set of governance policies and procedures

<p>procedures specifying at least the following:</p> <ul style="list-style-type: none"> • Board or governance body election or appointment process, • Board or governance body representation and Terms of Reference, • Member categories (where applicable), • Income generation or funding processes, • An organisational structure, • The decision-making processes of each governance body, • Key personnel roles (responsibility and authority), • Managing conflict of interest, and • Assurance process 			<p>specifying at least the following:</p> <ul style="list-style-type: none"> • Board or governance body election or appointment process, • Board or governance body representation and Terms of Reference, • Member categories (where applicable), • Income generation or funding processes, • An organisational structure, • The decision-making processes of each governance body, • Key personnel roles (responsibility and authority), • Managing conflict of interest, and • Assurance process
<p>A1.05 The Scheme Owner shall have in place a publicly available appeals and complaints resolution procedure and shall require this from approved audit firms and accreditation bodies. Each procedure shall require the respective body to:</p> <ul style="list-style-type: none"> • investigate and take appropriate action regarding relevant complaints, within defined timelines; • review and take any necessary corrective actions; and • keep a record of all complaints and resulting actions. 	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall have in place a publicly available appeals and complaints resolution procedure and shall require this from approved audit firms and accreditation bodies. Each procedure shall require the respective body to:</p> <ul style="list-style-type: none"> • investigate and take appropriate action regarding relevant complaints, within defined timelines; • review and take any necessary corrective actions; and • keep a record of all complaints and resulting actions.

● A2. Scope and Objectives

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
A2.01 The Scheme Owner shall have a defined scope for auditing under its scheme.	No comments received	N/A	The Scheme Owner shall have a defined scope for auditing under its scheme.
A2.02 For schemes addressing the primary production sector, if the Scheme's auditing scope includes smallholders / family farms, the Scheme owner shall have clear rules for the classification of producers as "smallholder / family farm" producers.	No comments received	N/A	For schemes addressing the primary production sector, if the Scheme's auditing scope includes smallholders / family farms, the Scheme owner shall have clear rules for the classification of producers as "smallholder / family farm" producers.

● A3. Integrity Programme

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
A3.01 The Scheme Owner shall have in place a clearly defined system for the approval, suspension and withdrawal of audit services by audit firms for the scope of their scheme.	No comments received	N/A	The Scheme Owner shall have in place a clearly defined system for the approval, suspension and withdrawal of audit services by audit firms for the scope of their scheme.
A3.02 The Scheme Owner shall define procedures to monitor the performance of	No comments received	N/A	The Scheme Owner shall define procedures to monitor the performance of

<p>audit firms. The procedures shall, at a minimum, include:</p> <ul style="list-style-type: none"> - the review of complaints - the review of audit reports - a risk-based programme of office audits and witness audits of audit firms that are approved to operate under the scheme <p>The monitoring of the performance may take the form of a risk-based programme, based on the region they operate, past complaints, number, size and complexity of assessments carried out by an audit firm.</p>			<p>audit firms. The procedures shall, at a minimum, include:</p> <ul style="list-style-type: none"> - the review of complaints - the review of audit reports - a risk-based programme of office audits and witness audits of audit firms that are approved to operate under the scheme <p>The monitoring of the performance may take the form of a risk-based programme, based on the region they operate, past complaints, number, size and complexity of assessments carried out by an audit firm.</p>
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● A4. Logo Use and Claims

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>A4.01 The Scheme Owner shall have a publicly available policy governing use of symbols, logos and claims.</p> <p>The policy shall, at a minimum, include that symbols, logos and claims</p> <ul style="list-style-type: none"> - are only applied to activities that are within the scope of certification/auditing, - do not overstate or mislead users relative to the defined scope or the status of the auditee 	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall have a publicly available policy governing use of symbols, logos and claims.</p> <p>The policy shall, at a minimum, include that symbols, logos and claims</p> <ul style="list-style-type: none"> - are only applied to activities that are within the scope of certification/auditing, - do not overstate or mislead users relative to the defined scope or the status of the

- are relevant to that scope and - the policy shall address copyright protection.			auditee - are relevant to that scope and - the policy shall address copyright protection.
A4.02 In the case of certification schemes, the Scheme Owner or its delegated authority issues written and enforceable authorisations and/or licenses to use the scheme’s mark/claim/logo only when the facility and/or product has been audited as being in conformity with the relevant standard.	No comments received	N/A	In the case of certification schemes, the Scheme Owner or its delegated authority issues written and enforceable authorisations and/or licenses to use the scheme’s mark/claim/logo only when the facility and/or product has been audited as being in conformity with the relevant standard.

● **A5. Standard Setting and Maintenance**

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
A5.01 Verification of the implementation of the corrective action plan by an audit firm shall take the form of further on-site assessment OR the review of submitted documentation assessed by a technically competent member or group within the audit firm. Follow-up audits shall be performed for critical or major non-compliances or when corrective actions can be evaluated only through an on-site visit.	No comments received	N/A	Verification of the implementation of the corrective action plan by an audit firm shall take the form of further on-site assessment OR the review of submitted documentation assessed by a technically competent member or group within the audit firm. Follow-up audits shall be performed for critical or major non-compliances or when corrective actions can be evaluated only through an on-site visit.

The Scheme Owner shall have publicly available procedures for the process under which each standard is developed, approved and revised.	No comments received	N/A	The Scheme Owner shall have publicly available procedures for the process under which each standard is developed, approved and revised.
A5.02 The Scheme Owner shall ensure participation of technical experts and encourages balanced participation by stakeholders in the standard development, revision and approval process.	No comments received	N/A	The Scheme Owner shall ensure participation of technical experts and encourages balanced participation by stakeholders in the standard development, revision and approval process.
A5.03 The Scheme Owner shall ensure that the standard, during its development or for major revisions, a. has been subject to public stakeholder consultation and b. due consideration has been given to comments received from stakeholders during the consultation.	No comments received	N/A	The Scheme Owner shall ensure that the standard, during its development or for major revisions, a. has been subject to public stakeholder consultation and b. due consideration has been given to comments received from stakeholders during the consultation.
A5.04 The Scheme Owner allows a period of at least 60 days for the submission of comments on the draft standard during the public consultation phase.	Should this be a set duration for comments, not a minimum of 60 days?	The duration is defined by the scheme, SSCI sets a minimum requirement of 60 days.	The Scheme Owner allows a period of at least 60 days for the submission of comments on the draft standard during the public consultation phase.
A5.05 The Scheme Owner reviews standards at least every five years for continued relevance and for effectiveness in meeting their stated objectives and, if necessary, revises them in a timely manner.	Why 5 years? Given the risk of rapid impacts of climate change and other considerations on agri-food operation sustainability, should this be <5 years? 4? Even 3?	It is common practice and in accordance with ISEAL ISEAL Code of Good Practice for Sustainability Systems v1.0	The Scheme Owner reviews standards at least every five years for continued relevance and for effectiveness in meeting their stated objectives and, if necessary, revises them in a timely manner.
A5.06 The Scheme Owner shall prepare sufficient guidance on the standard to support	No comments received	N/A	The Scheme Owner shall prepare sufficient guidance on the standard to

consistent interpretation of its requirements.			support consistent interpretation of its requirements.
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● B1. Accreditation

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>B1.01 If the scheme is written to issue certificates of compliance, the Scheme Owner shall require that audit firms achieve and maintain accreditation against the current version of ISO/IEC 17021-1 or ISO/IEC 17065 for the scope of the respective standard of the scheme. Requirements B1.02 to B1.09 apply to the scheme.</p> <p>If the scheme does not enable the issuing of certificates of compliance, the scheme must include:</p> <p>(a) a designated person/persons in charge of the programme and a defined procedure and requirements for auditor selection, training and qualification;</p> <p>(b) procedures for sampling methodology, audit days calculation and multisite audits</p> <p>(c) any additional objective measures to ensure that the audit firm is able to conduct audits in accordance with the policies and procedures established by the scheme owner.</p>	No comments received	N/A	<p>If the scheme is written to issue certificates of compliance, the Scheme Owner shall require that audit firms achieve and maintain accreditation against the current version of ISO/IEC 17021-1 or ISO/IEC 17065 for the scope of the respective standard of the scheme. Requirements B1.02 to B1.09 apply to the scheme.</p> <p>If the scheme does not enable the issuing of certificates of compliance, the scheme must include:</p> <p>(a) a designated person/persons in charge of the programme and a defined procedure and requirements for auditor selection, training and qualification;</p> <p>(b) procedures for sampling methodology, audit days calculation and multisite audits</p> <p>(c) any additional objective measures to ensure that the audit firm is able to conduct audits in accordance with the</p>

Requirements B1.02 to B1.09 do not apply to the scheme.			policies and procedures established by the scheme owner. Requirements B1.02 to B1.09 do not apply to the scheme.
B1.02 In the event that an audit firm is not yet accredited to ISO/IEC 17021 or ISO/IEC 17065, the Scheme Owner may put procedures in place for a clearly defined transition period to allow audit firms to achieve ISO accreditation. If a transition period is granted, it shall not exceed two years.	No comments received	N/A	In the event that an audit firm is not yet accredited to ISO/IEC 17021 or ISO/IEC 17065, the Scheme Owner may put procedures in place for a clearly defined transition period to allow audit firms to achieve ISO accreditation. If a transition period is granted, it shall not exceed two years.
B1.03 The Scheme Owner has a contractual, enforceable arrangement or formal understanding that requires accreditation bodies to be compliant with the requirements of the current version of ISO/IEC 17011.	No comments received	N/A	The Scheme Owner has a contractual, enforceable arrangement or formal understanding that requires accreditation bodies to be compliant with the requirements of the current version of ISO/IEC 17011.
B1.04 The Scheme Owner specifies the requirements for audit firms that the accreditation body is required to verify.	No comments received	N/A	The Scheme Owner specifies the requirements for audit firms that the accreditation body is required to verify.
B1.05 The Scheme Owner only works with accreditation bodies that have personnel with the necessary education, training, technical knowledge and experience for performing accreditation functions in social compliance.	Why social compliance only? Should this refer to compliance more broadly? (or is the term Social compliance referring to the broader scope of sustainability?)	The wording has been amended to include environmental compliance in addition to social compliance in order to encompass the broader scope of sustainability.	The Scheme Owner only works with accreditation bodies that have personnel with the necessary education, training, technical knowledge and experience for performing accreditation functions in social/environmental compliance.
B1.06 The Scheme Owner shall ensure that assessment staff within the accreditation body	No comments received	N/A	The Scheme Owner shall ensure that assessment staff within the accreditation

have knowledge of the standard and its intent, and of the schemes' assurance requirements.			body have knowledge of the standard and its intent, and of the schemes' assurance requirements.
B1.07 The Scheme Owner ensures that the accreditation process includes an on-site audit of the audit firm.	No comments received	N/A	The Scheme Owner ensures that the accreditation process includes an on-site audit of the audit firm.
B1.08 The Scheme Owner shall have an agreement in place with the accreditation body to ensure that, in the event that an audit firm has its accreditation withdrawn or suspended by the accreditation body, the Scheme Owner is informed of this action.	No comments received	N/A	The Scheme Owner shall have an agreement in place with the accreditation body to ensure that, in the event that an audit firm has its accreditation withdrawn or suspended by the accreditation body, the Scheme Owner is informed of this action.
B1.09 If more than one accreditation body is used, the Scheme Owner shall ensure that the accreditation is implemented in a consistent manner.	No comments received	N/A	If more than one accreditation body is used, the Scheme Owner shall ensure that the accreditation is implemented in a consistent manner.

● B2. Relationship with Audit Firms

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
B2.01 The Scheme Owner shall ensure that audit firms that are approved to operate their scheme are legal entities.	No comments received	N/A	The Scheme Owner shall ensure that audit firms that are approved to operate their scheme are legal entities.
B2.02 The Scheme Owner shall ensure that it has contractual and enforceable arrangements with all audit firms that are approved to	No comments received	N/A	The Scheme Owner shall ensure that it has contractual and enforceable arrangements with all audit firms that are approved to

operate their scheme.			operate their scheme.
B2.03 The Scheme Owner shall have in place a system to ensure an audit firm notifies them of all executed audit activities under their scheme, as well as any withdrawal or suspension.	No comments received	N/A	The Scheme Owner shall have in place a system to ensure an audit firm notifies them of all executed audit activities under their scheme, as well as any withdrawal or suspension.
B2.04 The Scheme Owner shall ensure that the audit firm operates an effective and fully implemented quality system. The quality system shall be fully documented and used by all relevant audit firm staff.	No comments received	N/A	The Scheme Owner shall ensure that the audit firm operates an effective and fully implemented quality system. The quality system shall be fully documented and used by all relevant audit firm staff.

● B3. Auditor Competence

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
B3.01 The Scheme Owner shall define the qualifications and competence criteria required of auditors.	No comments received	N/A	The Scheme Owner shall define the qualifications and competence criteria required of auditors.
B3.02 The Scheme Owner shall require that Lead auditors or audit teams performing audits for the audit firm: -Possess language skills suitable for verbal and written communication with the client and the client’s relevant stakeholder groups. This can be supplemented by an interpreter. -Have sufficient knowledge and experience of current international, national and	Should auditors have direct experience in the auditing of the agri-food sector of interest? (e.g., meat, fresh produce, other market segments)	Auditor experience on relevant standards is already required.	The Scheme Owner shall require that Lead auditors or audit teams performing audits for the audit firm: -Possess language skills suitable for verbal and written communication with the client and the client’s relevant stakeholder groups. This can be supplemented by an interpreter. -Have sufficient knowledge and

<p>local/regional laws and the industry’s relevant (social and/or environmental) best practices in the sector</p> <p>Lead auditors performing audits for the audit firm shall have at least:</p> <ul style="list-style-type: none"> - Successful completion of an accredited lead auditor training on relevant standards (e.g ISO 14001 for environmental and SA 8000 for social). - Participated as an observer auditor under training at different organisations, of which at least three (3) assessments shall be as the acting lead auditor under supervision (shadow audit) <p>For Environmental Standards: auditor experience for relevant standards for at least two (2) audits as the Lead Auditor</p> <p>For Social Standards: participation in a minimum of 20 social compliance audit days.</p> <p>5 years of related work experience in the scheme’s field or a total of 5 years of a combination of:</p> <ul style="list-style-type: none"> -Related work experience in the scheme sector or 			<p>experience of current international, national and local/regional laws and the industry’s relevant (social and/or environmental) best practices in the sector</p> <p>Lead auditors performing audits for the audit firm shall have at least:</p> <ul style="list-style-type: none"> - Successful completion of an accredited lead auditor training on relevant standards (e.g ISO 14001 for environmental and SA 8000 for social). - Participated as an observer auditor under training at different organisations, of which at least three (3) assessments shall be as the acting lead auditor under supervision (shadow audit) <p>For Environmental Standards: auditor experience for relevant standards for at least two (2) audits as the Lead Auditor</p> <p>For Social Standards: participation in a minimum of 20 social compliance audit days.</p> <p>5 years of related work experience in the scheme’s field or a total of 5 years of a</p>
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<p>-For environmental: environmental management (at least 2 years), relevant post-secondary or higher education -For Social: Social Compliance Audits, relevant post-secondary or higher education</p>			<p>combination of: -Related work experience in the scheme sector or -For environmental: environmental management (at least 2 years), relevant post-secondary or higher education -For Social: Social Compliance Audits, relevant post-secondary or higher education</p>
<p>B3.03 In the event that an audit firm is not yet meeting the requirements of B3.02, the Scheme Owner may put procedures in place for a clearly defined transition period to allow audit firms to meet these requirements.</p>	<p>No comments received</p>	<p>N/A</p>	<p>In the event that an audit firm is not yet meeting the requirements of B3.02, the Scheme Owner may put procedures in place for a clearly defined transition period to allow audit firms to meet these requirements.</p>
<p>B3.04 The Scheme Owner shall require audit firms that auditor competence is demonstrated on a recurring basis. The competence assessment of lead auditors and audit team members shall include the following:</p> <ul style="list-style-type: none"> • an assessment of knowledge of local and national labour and human rights/environmental issues and legislation; • an assessment of skills in interviewing workers on human and labour rights issues, • an assessment of knowledge of the relevant sector; • an assessment of the personal attributes of 	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall require audit firms that auditor competence is demonstrated on a recurring basis. The competence assessment of lead auditors and audit team members shall include the following:</p> <ul style="list-style-type: none"> • an assessment of knowledge of local and national labour and human rights/environmental issues and legislation; • an assessment of skills in interviewing workers on human and labour rights issues, • an assessment of knowledge of the

<p>the auditor, to ensure they conduct themselves in a professional manner;</p> <ul style="list-style-type: none"> • a period of supervision (witnessed audits) to cover specific audit techniques and specific category knowledge; • a documented sign off by the audit firm of the satisfactory completion of assessment requirements. 			<p>relevant sector;</p> <ul style="list-style-type: none"> • an assessment of the personal attributes of the auditor, to ensure they conduct themselves in a professional manner; • a period of supervision (witnessed audits) to cover specific audit techniques and specific category knowledge; • a documented sign off by the audit firm of the satisfactory completion of assessment requirements.
<p>B3.05 The Scheme Owner shall require audit firms that their auditors have successfully completed approved training in the respective scheme to the satisfaction of the scheme owner. Training shall be repeated regularly and following major revisions of the scheme.</p>	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall require audit firms that their auditors have successfully completed approved training in the respective scheme to the satisfaction of the scheme owner. Training shall be repeated regularly and following major revisions of the scheme.</p>
<p>B3.06 The Scheme Owner shall ensure that audit firms have a structure in place that assures that auditors shall keep up to date with industry best practice.</p>	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall ensure that audit firms have a structure in place that assures that auditors shall keep up to date with industry best practice.</p>
<p>B3.07 The Scheme Owner shall require audit firms to provide specific training to auditors on a regular basis, based on the most pertinent social compliance/environmental risks in the regions they operate in and individual performance reviews. Scheme owners shall require audit firms to document training attendance.</p>	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall require audit firms to provide specific training to auditors on a regular basis, based on the most pertinent social compliance/environmental risks in the regions they operate in and individual performance reviews. Scheme owners shall require audit firms to document</p>

			training attendance.
B3.08 The Scheme Owner shall require that if an audit firm sub-contracts any work to another party, a legally enforceable agreement between the audit firm and the sub-contracted party is in place to ensure the sub-contracted party adheres to the same policies, procedures and competence requirements when auditing against the scheme.	No comments received	N/A	The Scheme Owner shall require that if an audit firm sub-contracts any work to another party, a legally enforceable agreement between the audit firm and the sub-contracted party is in place to ensure the sub-contracted party adheres to the same policies, procedures and competence requirements when auditing against the scheme.
B3.09 The Scheme Owner shall require all approved audit firms to implement an ongoing programme for auditor calibration.	No comments received	N/A	The Scheme Owner shall require all approved audit firms to implement an ongoing programme for auditor calibration.

● B4. Audit Protocol

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
B4.01 The Scheme Owner shall define the methodology to assess compliance with the standard and require audit firms to apply this methodology consistently.	No comments received	N/A	The Scheme Owner shall define the methodology to assess compliance with the standard and require audit firms to apply this methodology consistently.
B4.02 The Scheme Owner shall require that the scope of the audit includes an on-site assessment of the main site and all other pertinent off-site locations, including surroundings and/or waste disposal and waste water treatment plants under the control of	How are "pertinent off-site locations" defined? Does it extend to municipal infrastructure such as waste management and related services?	"Pertinent off-site locations" refer to all external sites under the control of the organization that impact its operations, including waste disposal, wastewater treatment plants, and accommodation facilities. This does not extend to municipal infrastructure and services, which are not under the organization's direct control.	The Scheme Owner shall require that the scope of the audit includes an on-site assessment of the main site and all other pertinent off-site locations, including surroundings and/or waste disposal and waste water treatment plants under the

the organisation and accommodation facilities, where provided or mandated.			control of the organisation and accommodation facilities, where provided or mandated.
B4.03 The Scheme Owner shall define a procedure for audit firms to determine the number and selection of pertinent locations.	No comments received	N/A	The Scheme Owner shall define a procedure for audit firms to determine the number and selection of pertinent locations.
B4.04 The Scheme Owner shall have a clearly defined and documented audit frequency programme. The maximum validity of an audit or certificate shall not exceed 3 years. The Scheme Owner shall require audit firms to carry out periodic surveillance audits at sufficiently close intervals to verify compliance with the standards' requirements. The rationale behind these intervals shall be clearly defined and transparent.	No comments received	N/A	The Scheme Owner shall have a clearly defined and documented audit frequency programme. The maximum validity of an audit or certificate shall not exceed 3 years. The Scheme Owner shall require audit firms to carry out periodic surveillance audits at sufficiently close intervals to verify compliance with the standards' requirements. The rationale behind these intervals shall be clearly defined and transparent.
B4.05 The Scheme Owner shall ensure that, irrespective of the defined minimum audit frequency, the audit firm shall undertake additional surveillance audits in the event that there is evidence or suspicion of non-conformity within an organisation.	No comments received	N/A	The Scheme Owner shall ensure that, irrespective of the defined minimum audit frequency, the audit firm shall undertake additional surveillance audits in the event that there is evidence or suspicion of non-conformity within an organisation.
B4.06 The audit shall take place during a period - for At-Sea Operations: when on-site observation can take place, evidence can be	Should a provision be included for seasonal operations? E.g., for seasonal operations, when the site is during growing operations (i.e., not during	This is already included in the requirements under B4.06	The audit shall take place during a period - for At-Sea Operations: when on-site observation can take place, evidence can be collected, and interviews

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collected, and interviews can occur. - for all other scopes: when the employment site is in formal operation. Resulting variations to audit frequency shall be clearly defined and documented.	shutdowns or months when growing operations are not active; not during cultivation period?)		can occur. - for all other scopes: when the employment site is in formal operation. Resulting variations to audit frequency shall be clearly defined and documented.
B4.07 The Scheme Owner shall have in place auditing procedures and guidance for group/multi-site auditing and requires audit firms to apply the methodology consistently, if allowed under the scheme.	No comments received	N/A	The Scheme Owner shall have in place auditing procedures and guidance for group/multi-site auditing and requires audit firms to apply the methodology consistently, if allowed under the scheme.
B4.08 The Scheme Owner shall clearly define the expected duration of audits and the rationale for the determination of the duration of the audit that audit firms are required to follow during the audit. The rationale shall at a minimum include the size of the workforce/level of environmental risk and should include additional criteria that will ensure the effectiveness of the audit such as the physical size/geographical location of the location to audit, number of locations, nationalities of the workforce, product lines and product categories, etc.	No comments received	N/A	The Scheme Owner shall clearly define the expected duration of audits and the rationale for the determination of the duration of the audit that audit firms are required to follow during the audit. The rationale shall at a minimum include the size of the workforce/level of environmental risk and should include additional criteria that will ensure the effectiveness of the audit such as the physical size/geographical location of the location to audit, number of locations, nationalities of the workforce, product lines and product categories, etc.
B4.09 The Scheme Owner shall require that audits include worker and management interviews, the observation of processes and activities and the review of relevant documentation and records.	No comments received	N/A	The Scheme Owner shall require that audits include worker and management interviews, the observation of processes and activities and the review of relevant documentation and records.

<p>B4.10 The Scheme Owner shall define the methodology for defining the number of workers to be interviewed. Interviewed workers shall reflect a wide range of workers and include potentially vulnerable workers and those in less skilled positions/workers with responsibilities in the EMS.</p>	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall define the methodology for defining the number of workers to be interviewed. Interviewed workers shall reflect a wide range of workers and include potentially vulnerable workers and those in less skilled positions/workers with responsibilities in the EMS.</p>
<p>B4.11 The Scheme Owner shall define requirements for the execution of worker interviews that audit firms are required to implement. The requirements include at a minimum that:</p> <ul style="list-style-type: none"> - Workers shall be interviewed both individually and in groups - Workers shall be interviewed in a confidential setting without any supervision or management personnel present - Information provided by workers shall be processed in a non-attributable manner - Workers shall be interviewed in their own language - The selection of workers shall consider that they are representative of the factory, by characteristics such as gender, age, length of service and origin (migrant, domestic..) - In any event, management, supervisors or their representatives shall not act as interpreters 	<p>Should there be considerations for temporary foreign workers vs. domestic workers?</p>	<p>This is already included in the requirement: "...length of service and origin (migrant, domestic...)"</p>	<p>The Scheme Owner shall define requirements for the execution of worker interviews that audit firms are required to implement. The requirements include at a minimum that:</p> <ul style="list-style-type: none"> - Workers shall be interviewed both individually and in groups - Workers shall be interviewed in a confidential setting without any supervision or management personnel present - Information provided by workers shall be processed in a non-attributable manner - Workers shall be interviewed in their own language - The selection of workers shall consider that they are representative of the factory, by characteristics such as gender, age, length of service and origin (migrant, domestic..) - In any event, management, supervisors

			or their representatives shall not act as interpreters
B4.12 The Scheme Owner shall define requirements for the appointment of translators that audit firms are required to implement and make available. In cases where translators are utilized for audits, the Scheme Owner shall establish provisions to ensure that translators are independent, impartial and maintain confidentiality.	No comments received	N/A	The Scheme Owner shall define requirements for the appointment of translators that audit firms are required to implement and make available. In cases where translators are utilized for audits, the Scheme Owner shall establish provisions to ensure that translators are independent, impartial and maintain confidentiality.
B4.13 The Scheme Owner shall require audit firms to have policies and procedures in place to ensure the safety, protection and security of their auditors.	No comments received	N/A	The Scheme Owner shall require audit firms to have policies and procedures in place to ensure the safety, protection and security of their auditors.

● B5. Audit Reporting

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
B5.01 The Scheme Owner shall require certificates/audit reports to include, at a minimum: – the name and address of the Scheme Owner; – the name and address of the audit firm; – the name and address of the audited site; – the effective date of issue of the certificate/audit report;	No comments received	N/A	The Scheme Owner shall require certificates/audit reports to include, at a minimum: – the name and address of the Scheme Owner; – the name and address of the audit firm; – the name and address of the audited site; – the effective date of issue of the

<ul style="list-style-type: none"> – the substance (scope of audit) of the certificate/audit report; – in case of certification schemes: the term for which the certification is valid; – signature of the issuing officer. 			<p>certificate/audit report;</p> <ul style="list-style-type: none"> – the substance (scope of audit) of the certificate/audit report; – in case of certification schemes: the term for which the certification is valid; – signature of the issuing officer.
<p>B5.02 Reports and grading systems shall clearly identify whether audits are announced, semi-announced or unannounced.</p>	<p>No comments received</p>	<p>N/A</p>	<p>Reports and grading systems shall clearly identify whether audits are announced, semi-announced or unannounced.</p>
<p>B5.03 The Scheme Owner shall require that audit reports shall contain evidence that all the relevant criteria have been checked during the audit. In the case where a non-conformity is identified by the auditor, clear and concise details of the non-conformity shall be provided in the audit report.</p>	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall require that audit reports shall contain evidence that all the relevant criteria have been checked during the audit. In the case where a non-conformity is identified by the auditor, clear and concise details of the non-conformity shall be provided in the audit report.</p>
<p>B5.04 The Scheme Owner shall require audit firms to ensure that audit reports of full audits are given a thorough technical review. Surveillance audits shall, at a minimum, be reviewed according to a risk-based approach.</p> <p>For the review process to be effective it shall be ensured that:</p> <ul style="list-style-type: none"> - reviewers are impartial and technically capable of understanding the content of reports; 	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall require audit firms to ensure that audit reports of full audits are given a thorough technical review. Surveillance audits shall, at a minimum, be reviewed according to a risk-based approach.</p> <p>For the review process to be effective it shall be ensured that:</p> <ul style="list-style-type: none"> - reviewers are impartial and technically capable of understanding the content of

<p>- all applicable requirements of the standard have been fully covered, using any supporting notes made during the assessment by a suitably qualified auditor, - all areas of non-conformity have been identified and supported with clear evidence, - in the case of certification schemes, effective corrective action has been taken to resolve these non-conformities.</p>			<p>reports; - all applicable requirements of the standard have been fully covered, using any supporting notes made during the assessment by a suitably qualified auditor, - all areas of non-conformity have been identified and supported with clear evidence, - in the case of certification schemes, effective corrective action has been taken to resolve these non-conformities.</p>
<p>B5.05 The Scheme Owner shall define clear procedures in case non-compliances are found that pose an imminent danger to workers.</p>	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall define clear procedures in case non-compliances are found that pose an imminent danger to workers.</p>

● B6. Follow-up Action

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>B6.01 The Scheme Owner shall have a system for the classification of non-conformities that clearly specifies the definition of the different types of non-conformities.</p>	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall have a system for the classification of non-conformities that clearly specifies the definition of the different types of non-conformities.</p>
<p>B6.02 The Scheme Owner shall require the auditee to perform a root cause analysis of the non-conformities found.</p>	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall require the auditee to perform a root cause analysis of the non-conformities found.</p>
<p>B6.03 If one or more non-conformities are found, the Scheme Owner shall require the</p>	<p>No comments received</p>	<p>N/A</p>	<p>If one or more non-conformities are found, the Scheme Owner shall require</p>

auditee to prepare a corrective action plan, including details on the corrective actions and the time frame in which corrective actions shall be undertaken.			the auditee to prepare a corrective action plan, including details on the corrective actions and the time frame in which corrective actions shall be undertaken.
B6.04 Verification of the implementation of the corrective action plan by an audit firm shall take the form of further on-site assessment OR the review of submitted documentation assessed by a technically competent member or group within the audit firm. Follow-up audits shall be performed for critical or major non-compliances or when corrective actions can be evaluated only through an on-site visit.	No comments received	N/A	Verification of the implementation of the corrective action plan by an audit firm shall take the form of further on-site assessment OR the review of submitted documentation assessed by a technically competent member or group within the audit firm. Follow-up audits shall be performed for critical or major non-compliances or when corrective actions can be evaluated only through an on-site visit.
B6.05 The Scheme Owner shall define clear procedures regarding the follow-up action when non-conformities are found. In the case of certification schemes, all evidence of corrective action shall be submitted, completed and verified by the audit firm, within a timescale defined by the Scheme Owner.	No comments received	N/A	The Scheme Owner shall define clear procedures regarding the follow-up action when non-conformities are found. In the case of certification schemes, all evidence of corrective action shall be submitted, completed and verified by the audit firm, within a timescale defined by the Scheme Owner.
B5.06 In case of certification schemes, the Scheme Owner shall provide audit firms with consistent documented procedure(s) that specify the conditions under which certification may be suspended or withdrawn,	No comments received	N/A	In case of certification schemes, the Scheme Owner shall provide audit firms with consistent documented procedure(s) that specify the conditions under which certification may be suspended or

partially or in total, for all or part of the scope of certification.			withdrawn, partially or in total, for all or part of the scope of certification.
B6.07 The Scheme Owner shall require that the audit firm has in place a clearly defined and publicly available appeals procedure.	No comments received	N/A	The Scheme Owner shall require that the audit firm has in place a clearly defined and publicly available appeals procedure.

● B7. Data Management

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
B7.01 The Scheme Owner shall have in place a clearly defined data management system, which will hold and maintain data for the effective management and operation of the scheme.	Should this make reference to data management systems referencing voluntary or mandated data structures?	This requirement refers to record maintaining systems, question is unclear.	The Scheme Owner shall have in place a clearly defined data management system, which will hold and maintain data for the effective management and operation of the scheme.
B7.02 The Scheme Owner shall ensure that the data management system incorporates as a minimum: - Number of approved audit firms, - Number of audit reports/certificates issued - In case of certification schemes: number of delisted sites	No comments received	N/A	The Scheme Owner shall ensure that the data management system incorporates as a minimum: - Number of approved audit firms, - Number of audit reports/certificates issued - In case of certification schemes: number of delisted sites

● C1. Smallholders - Overview

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
C1.01 The Scheme Owner shall indicate whether or not it provides any specific requirements, exemptions, rules and definitions for smallholders in its assessment process.	No comments received	N/A	The Scheme Owner shall indicate whether or not it provides any specific requirements, exemptions, rules and definitions for smallholders in its assessment process.
C1.02 The Scheme Owner shall indicate in the audit or assessment report whether smallholders were covered during any particular assessments or certification process.	No comments received	N/A	The Scheme Owner shall indicate in the audit or assessment report whether smallholders were covered during any particular assessments or certification process.
C1.03 The Scheme Owner shall disclose their complete list of exemptions for smallholders.	No comments received	N/A	The Scheme Owner shall disclose their complete list of exemptions for smallholders.
C1.04 The Scheme Owner shall not allow performance exemptions for: <ul style="list-style-type: none"> ● Child labour ● Forced labour ● Minimum wage for hired workers / contracted workers ● Fair treatment of workers ● Operational health and safety ● Business Ethics 	No comments received	N/A	The Scheme Owner shall not allow performance exemptions for: <ul style="list-style-type: none"> ● Child labour ● Forced labour ● Minimum wage for hired workers / contracted workers ● Fair treatment of workers ● Operational health and safety ● Business Ethics

Documentation exemptions may be permitted for the above topics.			Documentation exemptions may be permitted for the above topics.
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● D1. Group Certification - Overview

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
D1.01 The Scheme Owner shall indicate whether or not it provides any specific requirements, exemptions, rules and definitions for group or multi-site certifications/auditing.	No comments received	N/A	The Scheme Owner shall indicate whether or not it provides any specific requirements, exemptions, rules and definitions for group or multi-site certifications/auditing.
D1.02 The Scheme Owner shall indicate in the audit or assessment report whether multiple producers or sites were covered during any particular assessment or certification process.	No comments received	N/A	The Scheme Owner shall indicate in the audit or assessment report whether multiple producers or sites were covered during any particular assessment or certification process.
D1.03 If group or multi-site certification is allowed, the standard shall disclose its sampling methodology.	No comments received	N/A	If group or multi-site certification is allowed, the standard shall disclose its sampling methodology.
D1.04 The Scheme Owner shall indicate whether internal management systems are reviewed during the group or multi-site certification process. In the absence of an IMS, the standard shall disclose its assessment methodology.	No comments received	N/A	The Scheme Owner shall indicate whether internal management systems are reviewed during the group or multi-site certification process. In the absence of an IMS, the standard shall disclose its assessment methodology.
D1.05 The Scheme Owner shall define clear rules for the operation of producer groups.	No comments received	N/A	The Scheme Owner shall define clear rules for the operation of producer groups.

● D2. Group Certification - Central Function

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
D2.01 The Scheme Owner shall require that producer groups and multi-site organisations have a clearly defined central function who acts on behalf of the group members or sites and it is responsible to ensure management commitment and compliance to the scheme requirements.	No comments received	N/A	The Scheme Owner shall require that producer groups and multi-site organisations have a clearly defined central function who acts on behalf of the group members or sites and it is responsible to ensure management commitment and compliance to the scheme requirements.
D2.02 The Scheme Owner shall require that there is an established, legal or contractual link between the group members or sites and the central function.	No comments received	N/A	The Scheme Owner shall require that there is an established, legal or contractual link between the group members or sites and the central function.
D2.03 The Scheme Owner shall require that the central function maintains an up-to-date list of group members and sites, and has a procedure in place to inform any new group member applicants or new sites about the requirements of the scheme.	No comments received	N/A	The Scheme Owner shall require that the central function maintains an up-to-date list of group members and sites, and has a procedure in place to inform any new group member applicants or new sites about the requirements of the scheme.
D2.04 The Scheme Owner shall require that the central function ensures that acceptance of new group members or sites happens only after an internal inspection has been performed and an improvement plan to ensure compliance has been agreed, if necessary.	No comments received	N/A	The Scheme Owner shall require that the central function ensures that acceptance of new group members or sites happens only after an internal inspection has been performed and an improvement plan to ensure compliance has been agreed, if necessary.

<p>D2.05 The Scheme Owner shall indicate whether a central function is responsible for implementing an Internal Management System (IMS) describing the roles and responsibilities of management, internal auditors and other members of the organisation related to scheme compliance. In the absence of an IMS, the Scheme Owner shall establish the rules for certification/audit ensuring that the audit firm conducts annual audits on:</p> <ul style="list-style-type: none"> • All accepted products and production processes • All registered group members or sites • The administrative sites, where relevant 	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall indicate whether a central function is responsible for implementing an Internal Management System (IMS) describing the roles and responsibilities of management, internal auditors and other members of the organisation related to scheme compliance. In the absence of an IMS, the Scheme Owner shall establish the rules for certification/audit ensuring that the audit firm conducts annual audits on:</p> <ul style="list-style-type: none"> • All accepted products and production processes • All registered group members or sites • The administrative sites, where relevant
<p>D2.06 The Scheme Owner shall require that the central function has in place sufficient management and technical capacity to implement and maintain an internal audit programme.</p>	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall require that the central function has in place sufficient management and technical capacity to implement and maintain an internal audit programme.</p>
<p>D2.07 The Scheme Owner shall require that the central function maintains and retains a copy of all relevant IMS documents related to the group members or sites under the scheme.</p>	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall require that the central function maintains and retains a copy of all relevant IMS documents related to the group members or sites under the scheme.</p>
<p>D2.08 The Scheme Owner shall require that the central function performs a yearly management review of the IMS to ensure its</p>	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall require that the central function performs a yearly management review of the IMS to ensure</p>

effectiveness.			its effectiveness.
D2.09 The Scheme Owner shall require that the central function has an effective grievance mechanism. The mechanism can be used by all internal and external stakeholders.	No comments received	N/A	The Scheme Owner shall require that the central function has an effective grievance mechanism. The mechanism can be used by all internal and external stakeholders.

● D3. Group Certification - Internal Audit System

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
D3.01 The Scheme Owner shall require that an internal audit programme be in place and undertaken by the central function. This programme shall ensure an annual audit of all group members or sites, the central function and the internal management system.	No comments received	N/A	The Scheme Owner shall require that an internal audit programme be in place and undertaken by the central function. This programme shall ensure an annual audit of all group members or sites, the central function and the internal management system.
D3.02 The Scheme Owner shall require that the internal audit programme of the central function be described in documented procedures and be both practical and feasible in operative terms.	No comments received	N/A	The Scheme Owner shall require that the internal audit programme of the central function be described in documented procedures and be both practical and feasible in operative terms.
D3.03 The Scheme Owner shall require that clear requirements for internal auditors and technical reviewers be defined and documented by the central function and reviewed by the audit firm. Internal auditors must meet similar or comparable requirements to those for external auditors, as	No comments received	N/A	The Scheme Owner shall require that clear requirements for internal auditors and technical reviewers be defined and documented by the central function and reviewed by the audit firm. Internal auditors must meet similar or comparable requirements to those for external

set out within each scheme owner's rules. This shall include, at a minimum, requirements related to internal auditor education, training, work experience or other qualifications.			auditors, as set out within each scheme owner's rules. This shall include, at a minimum, requirements related to internal auditor education, training, work experience or other qualifications.
D3.04 The Scheme Owner shall require that internal auditors be regularly evaluated, calibrated and monitored. Records of the evaluation, calibration and monitoring activities shall be maintained by the central function.	No comments received	N/A	The Scheme Owner shall require that internal auditors be regularly evaluated, calibrated and monitored. Records of the evaluation, calibration and monitoring activities shall be maintained by the central function.
D3.05 The Scheme Owner shall require that internal audit reports be reviewed by the central function and include corrective measures to address the non-conformances resulting from the internal audit, as well as evidence that non-conformances are closed.	No comments received	N/A	The Scheme Owner shall require that internal audit reports be reviewed by the central function and include corrective measures to address the non-conformances resulting from the internal audit, as well as evidence that non-conformances are closed.

● D4. Group Certification - Audit Protocol

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
D4.01 The Scheme Owner shall require that the central function requests group or multi-site certification in their application. The central function, not the individual group members or sites, shall be contracted to the audit firm.	No comments received	N/A	The Scheme Owner shall require that the central function requests group or multi-site certification in their application. The central function, not the individual group members or sites, shall be contracted to the audit firm.

D4.02 The Scheme Owner shall require that the central function be included in the scope of the certification/audit report.	No comments received	N/A	The Scheme Owner shall require that the central function be included in the scope of the certification/audit report.
D4.03 The Scheme Owner shall require that the central function be audited by the audit firm at least annually and before the audit firm undertakes the auditing of sample group members or sites. If necessary, a small number of the sample group members or sites may be audited prior to the audit to the central function.	No comments received	N/A	The Scheme Owner shall require that the central function be audited by the audit firm at least annually and before the audit firm undertakes the auditing of sample group members or sites. If necessary, a small number of the sample group members or sites may be audited prior to the audit to the central function.

● D5. Group Certification - Site-Audit Sampling

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>D5.01 The Scheme Owner shall establish the rules for a risk-based sampling programme including a minimum sample size.</p> <p>The sampling program shall include provisions to increase sample size based on various risk factors (e.g., audit scope, types of activities on-site, findings of the central management system audit, findings at sampled group members or sites, customer requirements, etc.), size of the group or multi-site, and the internal structure.</p>	No comments received	N/A	<p>The Scheme Owner shall establish the rules for a risk-based sampling programme including a minimum sample size.</p> <p>The sampling program shall include provisions to increase sample size based on various risk factors (e.g., audit scope, types of activities on-site, findings of the central management system audit, findings at sampled group members or sites, customer requirements, etc.), size of the group or multi-site, and the internal structure.</p>

D5.02 The Scheme Owner shall ensure that the audit firm audits a sample of the group members or sites every year.	Should there be a reference to what time of year e.g., during operating periods, not others?	This is covered under Chapter B4.	The Scheme Owner shall ensure that the audit firm audits a sample of the group members or sites every year.
D5.03 The Scheme Owner shall require that the square root of the total number of registered group members or sites be audited. The sampling plan can be adjusted based on the use of monitoring technologies.	No comments received	N/A	The Scheme Owner shall require that the square root of the total number of registered group members or sites be audited. The sampling plan can be adjusted based on the use of monitoring technologies.
D5.04 The Scheme Owner shall require that the sampling programme be partly selective and partly non-selective, but at least 25% of the sample shall be randomly selected from the total number of group members or sites. In relation to the selected sites, these shall be identified based on the organisation's internal audit program findings and the individual group member or site risk profiles.	No comments received	N/A	The Scheme Owner shall require that the sampling programme be partly selective and partly non-selective, but at least 25% of the sample shall be randomly selected from the total number of group members or sites. In relation to the selected sites, these shall be identified based on the organisation's internal audit program findings and the individual group member or site risk profiles.
D5.05 The Scheme Owner shall require that a proportion of the audits be unannounced. The unannounced audit sample size shall be determined by the social compliance risk but be at a minimum of 20% of the sample size.	No comments received	N/A	The Scheme Owner shall require that a proportion of the audits be unannounced. The unannounced audit sample size shall be determined by the social compliance risk but be at a minimum of 20% of the sample size.
D5.06 In the case of certification schemes, if non-conformities are found which may not jeopardise certification but may raise concerns on conformity of the organisation,	No comments received	N/A	In the case of certification schemes, if non-conformities are found which may not jeopardise certification but may raise concerns on conformity of the

<p>the Scheme Owner shall require that the audit firm increase the sample size to ensure adequate confidence in the conformity of the organisation.</p>			<p>organisation, the Scheme Owner shall require that the audit firm increase the sample size to ensure adequate confidence in the conformity of the organisation.</p>
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● D6. Group Certification - Follow-up Action

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>D6.01 The Scheme Owner shall require that non-conformities found on group members or sites be assessed to ascertain if these indicate an overall internal management system deficiency and therefore may be applicable to all or other group members or sites. If non-conformities relate to all or other group members or sites, corrective action shall be undertaken and verified both by the central function and by the audit firm.</p>	<p>No comments received</p>	<p>N/A</p>	<p>The Scheme Owner shall require that non-conformities found on group members or sites be assessed to ascertain if these indicate an overall internal management system deficiency and therefore may be applicable to all or other group members or sites. If non-conformities relate to all or other group members or sites, corrective action shall be undertaken and verified both by the central function and by the audit firm.</p>
<p>D6.02 In the case of certification schemes, if the central function or any group member or site fails to meet the critical scheme requirements, the Scheme Owner shall require that the whole organisation will fail to gain certification. Where certification has previously been in place, this shall initiate the audit firm process to suspend or withdraw its</p>	<p>No comments received</p>	<p>N/A</p>	<p>In the case of certification schemes, if the central function or any group member or site fails to meet the critical scheme requirements, the Scheme Owner shall require that the whole organisation will fail to gain certification. Where certification has previously been in place, this shall initiate the audit firm process to</p>

certification.			suspend or withdraw its certification.
<p>D6.03 The Scheme owner shall determine the methodology for issuing certificates/audit reports to the central function and the group member or sites.</p> <p>Either:</p> <ul style="list-style-type: none"> • certificate/audit reports are issued to the central function of the producer group or multi-site organisation; or • separate certificates/audit reports are issued to group members or sites of the group or multisite organisation that were audited as part of the sample plan. <p>Those certificates/audit reports must be clearly distinguishable from certificates/audit reports that are issued to individually audited companies.</p> <p>The certificate/audit report must state explicitly that the recipient is part of a producer group or multi-site organisation, and any limitations to the scope of certification/audit report must be transparent to customers.</p>	<p>How is the "site" defined? Are there any key concerns for agri-food or produce operations in particular?</p>	<p>From the SSCI Glossary: Site: A permanent location where a facility/producer carries out work or activity.</p>	<p>The Scheme owner shall determine the methodology for issuing certificates/audit reports to the central function and the group member or sites.</p> <p>Either:</p> <ul style="list-style-type: none"> • certificate/audit reports are issued to the central function of the producer group or multi-site organisation; or • separate certificates/audit reports are issued to group members or sites of the group or multisite organisation that were audited as part of the sample plan. <p>Those certificates/audit reports must be clearly distinguishable from certificates/audit reports that are issued to individually audited companies.</p> <p>The certificate/audit report must state explicitly that the recipient is part of a producer group or multi-site organisation, and any limitations to the scope of certification/audit report must be transparent to customers.</p>
<p>D6.04 If a group member or site is allowed to sell their product outside of the producer group or multi-site organisation, the Scheme Owner shall require that the group member or</p>	<p>No comments received</p>	<p>N/A</p>	<p>If a group member or site is allowed to sell their product outside of the producer group or multi-site organisation, the Scheme Owner shall require that the</p>

site be transparent about the source and scope of the audit, by providing customers with a copy of the certificate/audit report when requested.			group member or site be transparent about the source and scope of the audit, by providing customers with a copy of the certificate/audit report when requested.
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Environmental Benchmark Requirements

● Chapter 1: Environmental Management Systems

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
1.1 The standard shall require that top management demonstrates its commitment to environmental sustainability.	A company wide environmental policy, public statements, training and implementation plan and programs, organisation charts, environmental management system, etc.	1. Consider adding "company wide policy" regarding sustainability topics, not focused only on the top management. 2. General comment for all of Chapter 1: What environmental sustainability framework should be applied? E.g., what environmental factors are "must have" vs. "nice to have", such as GHG emissions, water, waste management, other environmental impacts, etc? Is this applicable at this point?	1. The consideration has been added to the implementation examples. 2. Requirements 1.3, 1.5, 1.12, and 1.13 cascade down the implementation.	1.1 The standard shall require that top management demonstrates its commitment to environmental sustainability.
1.2 The standard shall require that the organization's environmental commitments, including goals and objectives, are publicly available.	Web site information, public environmental reports, etc.	1. Consider including public reports demonstrating the progress to commitments.	Progress report is already required under criterion 2.2	1.2 The standard shall require that the organization's environmental commitments, including goals and objectives, are publicly available.
1.3 The standard shall require that the organization's environmental commitments are communicated internally as appropriate.	Intranet information, posters, informative letters and emails, employee handbook, induction programs, training materials, etc.	No comments received		1.3 The standard shall require that the organization's environmental commitments are communicated internally as appropriate.
1.4 The standard shall require that the responsibility for the implementation of the standard's	Organisations chart, job descriptions, environmental policy, letter of assignment,	Consider including incentives to top management (beyond ESG, EHS, and Sustainability teams) for long-term progress and achievement of	Added management KPIs in the list of implementation examples.	1.4 The standard shall require that the responsibility for the implementation of the standard's

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Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
requirements is assigned to top management.	management KPIs, etc.	commitments (e.g., environmental criteria included in LTI schemes).		requirements is assigned to top management.
1.5 The standard shall require that personnel in relevant business functions receives training on the standard's requirements, appropriate for their roles and responsibilities.	Assessment of training needs, training plans and programs, training content, attendance records, etc.	No comments received		1.5 The standard shall require that personnel in relevant business functions receives training on the standard's requirements, appropriate for their roles and responsibilities.
1.6 The standard shall require that contractors under its control, doing work that affects its environmental performance and its ability to fulfil its compliance obligations, are competent on the basis of appropriate education, training or experience.	Contracting procedures, contractor monitoring and/or evaluation program, contractor's professional licenses, certifications and/or accreditations, etc.	Please clarify whether it will consider Tier 2 suppliers/contractors.	Suppliers are covered under criterion 1.7 cascading to Tier 2 goes beyond minimum requirements.	1.6 The standard shall require that contractors under its control, doing work that affects its environmental performance and its ability to fulfil its compliance obligations, are competent on the basis of appropriate education, training or experience.
1.7 The standard shall require that the organisation has a responsible sourcing policy with the aim of buying high risk ingredients, materials and components that comply with the standard's requirements.	Ingredients, materials and components risk assessment, responsible sourcing policy, procedure for approval of suppliers, supplier certifications, verification protocol for high risk components.	How does this criterion apply to a producer/to primary production? This seems more applicable to a corporate entity sourcing high-risk ingredients. A primary producer isn't sourcing anything, they are growing it. Unless this is intended to refer to nutrients and pesticides? If that's the case it's unclear, and I feel those are already covered in other sections.	The feedback has been accepted and the scope of the criterion has been modified to be applicable to manufacturing only.	1.7 The standard shall require that the organisation has a responsible sourcing policy with the aim of buying high risk ingredients, materials and components that comply with the standard's requirements.
1.8 The standard shall require that records on the amount produced and their respective certification claim(s) are maintained and available to	Record keeping procedures, record storage systems, etc.	Please clarify the UoM or what is meant by "amount."	"Amounts produced" replaced by annual production(s).	1.8 The standard shall require that records on the annual production(s) and their respective certification claim(s) are maintained and available to

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stakeholders for chain of custody and certification of finished products.				stakeholders for chain of custody and certification of finished products.
1.9 The standard shall require the geolocation of all plots of land used for the production of cattle, cocoa, coffee, oil palm, rubber, soya and wood.	Geolocation data, contract with geolocation service, geolocation digital applications, supplier due diligence procedure, etc.	1. It is unclear why these 8 commodities are singled out- does this refer to another framework, policy, or standard? 2. This would be better addressed in criteria 10.3 of the land use and biodiversity section, e.g., as part of the deforestation/conversion policy.	1. A footnote referring to the EUDR has been added. 2. The criterion has been moved to the chapter Land Use and Biodiversity.	10.4 The standard shall require the geolocation of all plots of land used for the production of the commodities most relevant in terms of driving global deforestation and forest degradation, including cattle, cocoa, coffee, oil palm, rubber, soya and wood. *Commodities most relevant in terms of driving global deforestation are in line with the EUDR legislation
1.10 The standard shall require that records and documentation (e.g., measurements, training records...) are maintained and accessible for a defined period of time to demonstrate compliance with the standards' requirements.	Record keeping procedures, record storage systems, etc.	Isn't this inherently addressed by virtue of an auditor auditing a standard? They will need to see documentation for many criteria in a standard scheme already, and if those documents don't exist, an operation seeking certification will not get credit. This requires an organization to create an additional policy about recordkeeping, on top of what will already be a substantial amount of recordkeeping needed to certify.	Recordkeeping policy is just an example of evidence for implementation. If the organisations demonstrate suitable practices the policy might not be needed.	1.9 The standard shall require that records and documentation (e.g., measurements, training records...) are maintained and accessible for a defined period of time to demonstrate compliance with the standards' requirements.
1.11 The standard shall require that significant environmental aspects and impacts (negative and positive) are identified and that risks and opportunities	Risk assessment procedure and results, list of significant aspects, list with risk and opportunities, materiality	Consider including: Materiality assessment (Critical risk + impact) to pinpoint the relevant topics for the supplier, and focalize only on those (and comply with those requirements). This is a	Added materiality assessment in the list of implementation examples.	1.10 The standard shall require that significant environmental aspects and impacts (negative and positive) are identified and that risks and opportunities related to its

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related to its environmental aspects are determined.	assessment, etc.	regulatory requirement in some jurisdictions.		environmental aspects are determined.
1.12 The standard shall require that a management plan is implemented, including environmental goals, objectives and actions to achieve the objectives.	Documented management plan, measurable objectives and targets, environmental management system, environmental management certifications, etc.	No comments received		1.11 The standard shall require that a management plan is implemented, including environmental goals, objectives and actions to achieve the objectives.
1.13 The standard shall require that the environmental performance of the organisation is monitored, the progress periodically reviewed and the results of this monitoring and evaluation fed back into the planning process to ensure continuous improvement.	A description of monitoring systems of environmental performance, monitoring records, management review process and/or minutes of meeting, review and update of the management plan, etc.	No comments received		1.12 The standard shall require that the environmental performance of the organisation is monitored, the progress periodically reviewed and the results of this monitoring and evaluation fed back into the planning process to ensure continuous improvement.

● Chapter 2: Compliance, Transparency and Complaints

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
2.1 The standard shall require that the organisation fulfils its compliance obligations.	Legal register, legal compliance audit records, permits and licenses, compliance requirements document/process, change management processes including compliance considerations, etc.	Consider including: At a minimum, sites should have a compliance requirements document/process which captures all legal requirements and a description of how those requirements are consistently met, including roles & responsibilities, required evidence. Also, Management of Change processes should include Environmental Compliance considerations - permits, authorizations, etc. to ensure process changes, expansions et al fully comply with legal obligations. Suggest adding this as a separate bullet point.	This has been added to the list of implementation examples.	2.1 The standard shall require that the organisation fulfils its compliance obligations.
2.2 The standard shall require that the organisation makes adequate information on its sustainability performance available to stakeholders.	Publication of environmental reporting, information shared on the webpage, sustainability performance communications to stakeholders, etc.	No comments received		2.2 The standard shall require that the organisation makes adequate information on its sustainability performance available to stakeholders.
2.3 The standard shall require that a mechanism to address complaints or concerns, regarding the organisation's environmental performance or its compliance obligations, is established. The	Grievance or complaint procedures, hotline contract, records of received complaints, complaint investigation reports, etc.	No comments received		2.3 The standard shall require that a mechanism to address complaints or concerns, regarding the organisation's environmental performance or its compliance obligations, is

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
mechanism shall be accessible and understandable to all workers and external parties.				established. The mechanism shall be accessible and understandable to all workers and external parties.
2.4 The standard shall require that the confidentiality of any complaint raised is provided, and information is revealed only as necessary to investigate and handle the complaint.	Grievance or complaint procedures, hotline contract, records of received complaints, complaint investigation reports, emails and communications concerning complaints, etc.	Wording may need review. "Confidentiality of ...complaint raised is provided". Should this read, 'protected'?	Wording has been amended.	2.4 The standard shall require that the confidentiality of any complaint concerning environmental performance raised is protected, and information is revealed only as necessary to investigate and handle the complaint.
2.5 The standard shall require that no worker or external party that lodged a complaint in good faith is retaliated against.	Grievance or complaint procedures, hotline contract, records of received complaints, complaint investigation reports, emails and communications concerning complaints, etc.	Is this within the scope of the standard, or more suitably referenced through other labour provisions (e.g., whistle blower legisl., other?)	Scope of criteria 2.4 and 2.5 have been clarified and wording has been amended to include environmental and reflect the change.	2.5 The standard shall require that no worker or external party that lodged an environmental complaint in good faith is retaliated against.

● Chapter 3: Pollution Prevention

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
3.1 The standard shall require that systems and processes shall be implemented for pollution prevention and to minimise the risk of pollution incidents.	Procedures for management, storage, handling and disposal of all hazardous substances, training materials and records, employee licenses, adequate storage facilities, adequate washing facilities, waste disposal procedures, availability of SDSs, inspection checklists and reports, etc.	No comments received		3.1 The standard shall require that systems and processes shall be implemented for pollution prevention and to minimise the risk of pollution incidents.
3.2 The standard shall require that systems and processes shall be implemented to prevent the drift or run-off of pollutants to neighbouring areas.	Drift prevention plan, Stormwater pollution prevention plan, justification for the use of aerial applications, records of aerial applications, maintenance and calibration records of application equipments, pesticide-free spatial and vegetative buffers, etc.	Consider including: Stormwater pollution prevention plan in the requirements. (A Stormwater Pollution Prevention Plan (SWPPP) is a site-specific, written document developed to identify potential sources of stormwater pollution at a site.)	Stormwater pollution prevention has been added to the list of implementation examples.	3.2 The standard shall require that systems and processes shall be implemented to prevent the drift or run-off of pollutants to neighbouring areas.
3.3 The standard shall require that systems and processes are in	Guidance documents, standard operating	Is a definition of what constitutes "contamination" required? (e.g, pesticide "contamination" vs.	Replaced contamination for pollution since it is already defined in the	3.3 The standard shall require that systems and processes are

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
place to contain and mitigate the contamination of air, soil and/or surface and groundwater.	procedures (procedures), training materials and records, appropriate materials and supplies necessary to manage spills, machinery maintenance logs and inspection records, etc.	"microplastic contamination" are significantly different issues/sources). Contamination & pollution = same?	Glossary.	in place to contain and mitigate the pollution of air, soil and/or surface and groundwater.
3.4 The standard shall require that pollution incidents are communicated to affected stakeholders, as appropriate.	Register of incidents, communications to stakeholders, emergency plan including communication requirements, training materials on emergency procedures, etc.	No comments received		3.4 The standard shall require that pollution incidents are communicated to affected stakeholders, as appropriate.
3.5 The standard shall require that an emergency response plan is in place, detailing: -roles and responsibilities, -training requirements, -response guidelines and for the prevention and management of major incidents, including environmental, according to the risks of the activities undertaken on the production or processing sites.	Documented emergency plan, training materials and records on emergency procedures, drill plan and reports, emergency information in the premises, job descriptions, etc.	Consider including: 3rd party review and at least annual drill to ensure effectiveness of the ERP.	Annual drills have been added to the emergency response plan details.	3.5 The standard shall require that an emergency response plan is in place, detailing: -roles and responsibilities, -training requirements, -response guidelines and - annual drill requirements for the prevention and management of major incidents, including environmental, according to

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
				<p>the risks of the activities undertaken on the production or processing sites.</p>
<p>3.6 The standard shall require that major incidents shall be investigated, and the results of the investigation communicated to the affected stakeholders.</p>	<p>Incident investigation process, incident investigation reports, notifications of major incidents, etc.</p>	<p>Consider including not only investigation completed, but Corrective and Preventative Actions (CAPA) identified and tracked to completion.</p>	<p>The need for preventive and corrective actions has been added to the criteria.</p>	<p>3.6 The standard shall require that major incidents shall be investigated, corrective and preventive actions identified and implemented and the results of the investigation communicated to the affected stakeholders.</p>

● Chapter 4: Management of Potentially Hazardous Substances

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
4.1 The standard shall require that an inventory of hazardous substances used and stored is maintained.	Procedures for management, storage, handling and disposal of all hazardous substances, list of hazardous substances used and stored on the production site, etc.	No comments received		4.1 The standard shall require that an inventory of hazardous substances used and stored is maintained.
4.2 The standard shall require that only officially registered products are used. Where no official registration exists, the standard shall require that guidance is provided on health, physical and environmental hazards in accordance with applicable national legal requirements.	Procedures for management, storage, handling and disposal of all hazardous substances, list of hazardous substances used and stored on the production site, safety data sheets (SDSs), training materials or guidance to help workers who handle hazardous chemicals to become familiar with the format and understand the contents of the SDSs, etc.	1. What is meant by officially registered? 2. It is not clear on “guidance is provided on health, physical and environmental hazards in accordance with national legal requirements.” If a country doesn’t have an approved pesticide registry, it seems unlikely that the country would have legal requirements to provide health, physical and environmental hazard information to producers/farm workers? The implementation examples listed here are very similar to those for 4.1 as well, so I question whether this is realistically adding any value. I tend to think that the previous language was clearer, referencing “where no official registration exists, standards shall require guidance is provided based on MSDS sheets” and perhaps that’s expanded to specify that includes environmental and human health hazards.	1. “Officially registered” means that products must be approved and listed by a relevant regulatory authority, ensuring they meet safety and quality standards. 2.This is already covered by legal compliance in criterion 2.1.	4.2 The standard shall require that only officially registered products are used. Where no official registration exists, the standard shall require that information such as the properties of each chemical; the physical, health, and environmental health hazards; protective measures; and safety precautions for handling, storing and transporting the chemical is provided according to the Globally Harmonized System of Classification and Labelling of Chemicals (GHS).
4.3 The standard shall forbid the use of hazardous chemicals listed	List of prohibited chemicals, training materials and records	1. What of domestic restrictions in the jurisdictions of operation?	1. This is already covered by legal compliance in criterion 2.1.	4.3 The standard shall require compliance regarding the use

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
by WHO (1A and B) and the Stockholm convention (A, B and C) and Rotterdam convention (Annex III).	concerning training about prohibited chemicals, etc.	2. Consider allowing standards to have an exemptions process to grant specific, limited uses of these chemicals. There are a small minority of these chemicals that are rodenticides for which there are no registered alternatives, and are in some cases necessary to protect workers health and safety as well as food safety, and can be use within an IPM framework (i.e., based on monitoring rodent populations) and with specific placements that minimize potential risks. I can help identify a full list if that's helpful – offhand I see brodifacoum, bromadiolone, bromethalin, diphacinone and warfarin.	2. Rewording of the requirement to focus on compliance, with a specific provision introduced to allow for exemptions on hazardous chemicals under section 4.4.	of hazardous chemicals listed by WHO (1A and B), the Stockholm Convention (Annexes A, B, and C), and the Rotterdam Convention (Annex III).
New criterion	List of exemptions, studies to justify the exemptions, relevant legislation concerning the exempted products, etc.	N/A	Criterion introduced by the SSCI Environmental Working Group based on stakeholder feedback.	4.4 If the standard allows for exemptions to the hazardous chemicals included in criterion 4.3 when there are no registered alternatives, the exemptions shall be for a limited use, publicly available, and be justified based on the basis of the protection of worker health and safety and/or food protection.
4.4 The standard shall require that systems and processes shall be implemented for the safe	Procedures for management, storage, handling and disposal of all hazardous substances,	No comments received		4.5 The standard shall require that systems and processes shall be implemented for the safe handling, storage, use,

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
handling, storage, use, transportation and disposal of all hazardous substances, in order to minimize the potential for negative impacts on human health.	training materials and records, employee licences, H&S manual, PPE use guidance and instructions, records of PPE provision and inspection, adequate storage facilities, adequate washing facilities, waste disposal procedures, availability of SDSs, inspection SOP and reports, etc.			transportation and disposal of all hazardous substances, in order to minimize the potential for negative impacts on human health.

● Chapter 5: Integrated Pest Management

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
5.1 The standard shall require that the organisation optimizes the use of pest control products by practicing Integrated Pest Management or an IPM equivalent method.	Pest/disease scouting and monitoring protocol, pest monitoring records, training and guidance documents for pest monitoring, guidance and training to select the most selective crop protection treatment options, list of approved preventive non-chemical pest management strategies (e.g. crop rotation, cover crops, mulching, etc) and/or biological controls (e.g., owl nesting boxes, bio-pesticides, matting disruptor materials, etc), assessment reports to justify pest control products applications, pest control product risk assessment, etc.	1. Pest control and / or Plant Protection Products? Pest control products in UK normally refers to vermin and PPP refer to weeds, insects and fungal pests. 2. It is unclear what an IPM-equivalent would be. I'm not aware of anything that would qualify and suggest removing that language.	1. A reference to PPP has been added to the criterion. 2. The suggestion is accepted and the criterion adapted accordingly.	5.1 The standard shall require that the organisation optimizes the use of plant protection and/or pest control products by practicing Integrated Pest Management.
5.2 The standard shall require that the pest control and management practices include: - systematic pest monitoring (insects, weeds, diseases...)	Pest/disease scouting and monitoring protocol, pest monitoring records, training and guidance documents for pest monitoring, guidance and	Pest control and / or Plant Protection Products? Pest control products in UK normally refers to vermin and PPP refer to weeds, insects and fungal pests.	A reference to PPP has been added to the criterion.	5.2 The standard shall require that the plant protection and/or pest control and management practices include: - systematic pest monitoring

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<ul style="list-style-type: none"> - use of non-chemical pest management strategies (cultural, physical/mechanical, biological) - monitoring the effectiveness of non-chemical control methods used - assessing pest control products risks and prioritizing lower-risk options when using chemicals. 	<p>training to select the most selective crop protection treatment options, list of approved preventive non-chemical pest management strategies (e.g. crop rotation, cover crops, mulching, etc) and/or biological controls (e.g., owl nesting boxes, bio-pesticides, matting disruptor materials, etc), assessment reports to justify pesticide applications, pesticide risk assessment, list of prohibited pest control products, etc.</p>			<p>(insects, weeds, diseases...)</p> <ul style="list-style-type: none"> - use of non-chemical pest management strategies (cultural, physical/mechanical, biological) - monitoring the effectiveness of non-chemical control methods used - assessing pest control products risks and prioritizing lower-risk options when using chemicals.
<p>5.3 The standard shall require that the use of pest control products is recorded, including:</p> <ul style="list-style-type: none"> - the product/trade name and active ingredients used, - the location treated, - the application rate and date, - the target pest and - the applicator's name. 	<p>Pest control products application records, training materials on pesticide application, etc.</p>	<p>Pest control and / or Plant Protection Products? Pest control products in UK normally refers to vermin and PPP refer to weeds, insects and fungal pests.</p>	<p>A reference to PPP has been added to the criterion.</p>	<p>5.3 The standard shall require that the use of plant protection and/or pest control products is recorded, including:</p> <ul style="list-style-type: none"> - the product/trade name and active ingredients used, - the location treated, - the application rate and date, - the target pest and - the applicator's name.

● Chapter 6: Soil Health

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
6.1 The standard shall require that areas at risk of erosion is identified and that measures for soil erosion prevention and mitigation shall be implemented.	Testing records on pH, NPK, organic matter, aggregate stability, compaction, infiltration rate, measures of the microbial community, land surveys etc.	1. Why only areas at risk of erosion? Should this be expanded to all soil critical for operations? Soil compaction should also be considered/included. 2. For Manufacturing, only considering the Soil erosion controls when doing construction or similar activities.	It is only applicable to identified risk areas, e.g., construction or similar. Reference to compaction has been added.	6.1 The standard shall require that areas at risk of erosion and compaction are identified and that prevention and mitigation measures shall be implemented.
6.2 The standard shall require that measures to maintain soil health and promote soil health recovery shall be implemented.	Mapping of sensitive soils and erosion-prone areas, soil management plans, application of best practices such as tillage systems, cover cropping and addition of soil amendments, etc.	No comments received		6.2 The standard shall require that measures to maintain soil health and promote soil health recovery shall be implemented.
6.3: The standard shall require that soil health is measured and monitored on a regular basis, as appropriate.	Testing records on pH, NPK, organic matter, aggregate stability, compaction, infiltration rate, measures of the microbial community, etc.	No comments received		6.3: The standard shall require that soil health is measured and monitored on a regular basis, as appropriate.
6.4 The standard shall require that fertilizer use is based on the crop needs and available nutrients in the soil.	Testing records on pH, NPK, organic matter, etc.	No comments received		6.4 The standard shall require that fertilizer use is based on the crop needs and available nutrients in the soil.
6.5 The standard shall require that the use of fertilizers is recorded.	Fertilizer application records, training materials on fertilizer application, etc.	No comments received		6.5 The standard shall require that the use of fertilizers is recorded.

● Chapter 7: Energy Use and GHG Emissions

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
7.1 The standard shall require that the energy consumption is measured and monitored, and that types of energy sources used for production, processing and transport are quantified and documented.	Records of energy measurements, energy purchase contracts and bills, etc.	No comments received		7.1 The standard shall require that the energy consumption is measured and monitored, and that types of energy sources used for production, processing and transport are quantified and documented.
7.2 The standard shall require that energy efficiency measures shall be implemented to reduce the use of energy.	Energy management plan, energy efficiency certificates, energy analysis data and reports, etc.	<p>1. Criterion should be clarified making it explicit that efficiency measures are restricted to aspects of forest management operations that organization can directly control, e.g., equipment age, equipment efficiency, appropriate type and size of equipment.</p> <p>2. As long as the energy used by our suppliers comes from a renewable resource, we shouldn't be inquiring about it. They should comply with point 7.3;7.4;7.5. Consider eliminating: Energy used per unit of production. As the real impact on environment will come from the overall reduction of energy used, not in its relation with production.</p>	<p>Aligned with 8.3 on water: The standard shall require that energy efficient measures shall be implemented to reduce the use of production and processing energy: absolute and per unit of production.</p> <p>Glossary: Unit of production: the smallest measure of output, product or individual items or units that are manufactured or processed in a production process.</p>	7.2 The standard shall require that energy efficiency measures shall be implemented to reduce the use of production and processing energy: absolute and per unit of production.
7.3 The standard shall require that measures shall be implemented to optimise the	Energy management plan, energy efficiency certificates, energy analysis data and	1. Why only renewable energy? Should this include use of energy sources with reduced carbon footprint compared to legacy technology (e.g., natural gas heating to electric	<p>1. This is already included in the criterion.</p> <p>2. Criterion 7.2 refers to energy</p>	7.3 The standard shall require that measures shall be implemented to optimise the

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
use of renewable energy.	reports, energy optimisation software, green energy certifications, etc.	heating where nuclear energy supplies grid power)? 2. If renewable energy is included in 7.2, then this criterion is redundant. Otherwise we shall mention that renewable energy is not included in 7.2	efficiency measures, while criterion 7.3 refers to gradually transitioning to renewable energy. The language has been adapted to reflect this difference.	use of renewable energy.
7.4 The standard shall require that scope 1 and 2 GHG (Greenhouse Gas) emissions are measured and monitored.	Records and calculations of GHG emission measurements, energy purchase contracts and energy bills, GHG reporting documents, etc.	1. Consider including and disclosed or available for review each year. 2. What about Scope 3 (all other indirect sources)? 3. Scope 1 and 2 emissions calculations are going to be a big change / new practice for primary producers, so this feels like a big lift to ask of growers as a minimum requirement for certification. However, retailers are increasingly being required to calculate their baselines, including scope 3, and set emissions reductions targets which will necessarily need to include their supply chain (scope 3), so I can see the importance of including this at the same time. It's just going to be a big challenge for a lot of growing operations.	1. Reporting on performance is required under criterion 2.2. 2. Scope 3 goes beyond minimum requirements.	7.4 The standard shall require that scope 1 and 2 GHG (Greenhouse Gas) emissions are measured and monitored.
7.5 The standard shall require that measures shall be implemented to reduce GHG emission in line with applicable protocols.	GHG Reduction Programs & Strategies, GHG emission analysis data and reports, energy certifications, software tools, Science based targets etc.	1. Reductions may not be possible, so optimisation may be more appropriate. 2. Consider including: Commit to Science Based Targets in accordance to SBTi Standards.	1. Reference added as evidence for implementation. Optimise will be included as a definition in the glossary. 2. SBTi included in implementation examples.	7.5 The standard shall require that measures shall be implemented to reduce/optimize GHG emission in line with relevant protocols.

● Chapter 8: Water Protection

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
8.1 The standard shall require that sources of water used for production and processing, if any, are identified.	Water source map/list, water protection policy, etc.	No comments received		8.1 The standard shall require that sources of water used for production and processing, if any, are identified.
8.2 The standard shall require water consumption for production and processing is measured and monitored.	Water consumption measurement and analysis records, etc.	No comments received		8.2 The standard shall require water consumption for production and processing is measured and monitored.
8.3 The standard shall require that measures shall be implemented to reduce the use of production and processing water.	Water management plan, water protection policy and strategy, soil moisture measurement records, etc.	Water use per unit of production, to avoid net water usage being the measure. Reduction may not be possible year on year. Optimisation may be more appropriate than reduction.	Criterion has been aligned with energy efficiency requirement. Included optimise instead of reduce as per energy criteria.	8.3 The standard shall require that water efficiency measures shall be implemented to optimise the use of production and processing water: absolute and per unit of production.
8.4 The standard shall require that measures shall be implemented to avoid the depletion of groundwater resources beyond its recharge capacity.	Water management plan, water protection policy and strategy, etc.	No comments received		8.4 The standard shall require that measures shall be implemented to avoid the depletion of groundwater resources beyond its recharge capacity.
8.5 The standard shall require that measures shall be implemented to ensure that irrigation is tailored to the crop needs.	Water management plan, water protection policy and strategy, crop irrigation needs assessment, precision irrigation methods, soil moisture	No comments received		8.5 The standard shall require that measures shall be implemented to ensure that irrigation is tailored to the crop needs.

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
8.6 The standard shall require that measures shall be implemented to protecting the water quality of rivers, streams, lakes, wetlands, other water bodies and riparian areas during production and processing.	measurement records, etc. Establish and maintain a streamside management areas along surface waters, preharvest planning including consideration of the potential water quality effects, effluent reduction programs, watershed analysis and management plans, wastewater quantity and quality measurement records, wastewater management program, wastewater objectives and targets, etc.	No comments received		8.6 The standard shall require that measures shall be implemented to protecting the water quality of rivers, streams, lakes, wetlands, other water bodies and riparian areas during production and processing.

● Chapter 9: Waste

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
9.1 The standard shall require that systems and processes are implemented for the safe handling, storage, transportation and disposal of waste.	Procedures for handling, storage, transport and disposal of waste, vendor agreements with waste management services, training materials and records, availability of SDSs, waste adequate management facilities, etc.	No comments received		9.1 The standard shall require that systems and processes are implemented for the safe handling, storage, transportation and disposal of waste.
9.2 The standard shall require that systems and processes shall be implemented for resource recovery, including repurpose, reuse, compost or recycle of residues and waste.	Waste segregation guidelines and training materials, waste reduction training reports, resource valuation reports, composting facilities and training materials, resource delivery notes, etc.	No comments received		9.2 The standard shall require that systems and processes shall be implemented for resource recovery, including repurpose, reuse, compost or recycle of residues and waste.
9.3 The standard shall require that systems and processes shall be implemented to reduce the generation of processing and manufacturing waste.	Waste reduction plan, waste reduction strategy, waste reduction programs, waste generation measurement and monitoring, training materials on waste reduction, training records on waste reduction.	Consider including: Packaging and disposal of unsold product as this is now an EU legal requirement.	Reference to unsold product has been added to the criterion.	9.3 The standard shall require that systems and processes shall be implemented to reduce the generation of processing and manufacturing waste, including unsold product.
9.4 The standard shall require that systems and processes	Training and guidance materials on food loss	To clarify - the scope is production only ? What of loss of food during transportation?	Transportation might not be the responsibility of the producer.	9.4 The standard shall require that systems and processes shall

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shall be implemented to prevent the excessive loss of food crops, other harvest products and/or merchantable waste during harvest and on-farm storage.	prevention, processes and measures to avoid mould and vermin, crop loss monitoring records, crop storage inspection reports, etc.			be implemented to prevent the excessive loss of food crops, other harvest products and/or merchantable waste during harvest and on-farm storage.
9.5 The standard shall require that open-air burning of residues, wastes or by-products is avoided and, where possible, eliminated.	Procedures for disposal of waste and by-products, vendor agreements with waste management services, training materials and records, etc.	No comments received		9.5 The standard shall require that open-air burning of residues, wastes or by-products is avoided and, where possible, eliminated.
9.6 The standard shall require that the waste generated and diverted from the landfill is measured and monitored.	Records of total waste produced and waste sent to landfills, delivery notes from landfills, etc.	<ol style="list-style-type: none"> 1. Consider including: Packaging and disposal of unsold product as this is now an EU legal requirement. 2. Will specific redirection paths be required (e.g., incineration, composting, recycling, other?) 		9.6 The standard shall require that the waste generated and diverted from the landfill, including unsold product, is measured and monitored.

● Chapter 10: Land Use and Biodiversity

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
10.1 The standard shall require that areas within or close to the production or processing sites, that fall under the definition of high conservation value (HCV), ecologically important, special sites or protected areas are identified.	Contracting procedures, contractor monitoring and/or evaluation program, contractor's professional licenses, certifications and/or accreditations, etc.	No comments received		10.1 The standard shall require that areas within or close to the production or processing sites, that fall under the definition of high conservation value (HCV), ecologically important, special sites or protected areas are identified.
10.2 The standard shall require that production or processing does not occur in areas that fall under the definition of high conservation value (HCV), ecologically important or special sites, protected areas, or their officially designated buffer zones. Exceptions might apply if the HVC values are maintained.	Map, catalogue and management plans of HVC, ecologically important, special sites or protected areas, employee training materials, due diligence protocol for the acquisition of land, etc.	For Manufacturing, only considering these requirements when doing construction or similar activities.	Criterion modified to not be applicable to manufacturing.	10.2 The standard shall require that production or processing does not occur in areas that fall under the definition of high conservation value (HCV), ecologically important or special sites, protected areas, or their officially designated buffer zones. Exceptions might apply if the HVC values are maintained.
10.3 The standard shall require a public deforestation/conversion policy:	Deforestation/conversion policy, action plan with milestones, map with identified natural forests and	For Manufacturing, only considering these requirements when doing construction or similar activities.	Criterion modified to not be applicable to manufacturing.	10.3 The standard shall require a public deforestation/conversion policy: - identifying the regions of

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Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>- identifying the regions of application and relevant natural forest and ecosystems types,</p> <p>- committing to prevent the conversion of natural forests, or other natural ecosystems, to agriculture, plantation forestry or other land uses and</p> <p>- defining deforestation cut-off dates(s) in line with applicable deforestation protocols.</p>	<p>ecosystem types, policy publication at the company website, employee training on the policy, etc.</p>	<p>Ontario’s policy framework legally requires harvested forests to be seeded, planted or naturally regenerated back to a forested state. A forest that has been harvested remains a forest. There is no change in land use. It is regenerated to be similar to a natural unmanaged forest and to meet sustainable long-term management goals.</p>		<p>application and relevant natural forest and ecosystems types,</p> <p>- committing to prevent the conversion of natural forests, or other natural ecosystems, to agriculture, plantation forestry or other land uses and</p> <p>- defining deforestation cut-off dates(s) in line with applicable deforestation protocols.</p>
<p>New criterion</p>	<p>Geolocation data, contract with geolocation service, geolocation digital applications, supplier due diligence procedure, etc.</p>	<p>N/A</p>	<p>Criterion moved from chapter 1 to chapter 10 based on stakeholder feedback.</p>	<p>10.4 The standard shall require the geolocation of all plots of land used for the production of the commodities most relevant in terms of driving global deforestation and forest degradation, including cattle, cocoa, coffee, oil palm, rubber, soya and wood.</p> <p>*Commodities most relevant in terms of driving global deforestation are in line with the EUDR legislation</p>
<p>10.4 The standard shall require that the organisation avoids, remedies or mitigates negative environmental</p>	<p>Map, catalogue and management plans of HVC, ecologically important, special sites or protected areas,</p>	<p>For Manufacturing, only considering these requirements when doing construction or similar activities.</p>	<p>Criterion remain applicable for manufacturing.</p>	<p>10.5 The standard shall require that the organisation avoids, remedies or mitigates negative environmental impacts, which may</p>

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Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
impacts, which may arise from the organisation's activities, on biodiversity values and the quality of areas that fall under the definition of high conservation value (HCV), ecologically important or special sites or protected areas.	employee training materials, due diligence protocol for the acquisition of land, risk assessment of production, processing and construction activities with prevention measures, remediation and mitigation reports, impact mitigation plan, measurement and monitoring of biodiversity values and quality indicators, mitigation activity reports, etc.			arise from the organisation's activities, on biodiversity values and the quality of areas that fall under the definition of high conservation value (HCV), ecologically important or special sites or protected areas.
10.5 The standard shall require that fire is not used for preparing or cleaning fields, except when specifically justified in the IPM plan or as tool in forest management for regeneration, wildfire protection and habitat management or a recognized practice of indigenous people.	Procedures and employee training materials for preparing and cleaning fields, etc.	No comments received		10.6 The standard shall require that fire is not used for preparing or cleaning fields, except when specifically justified in the IPM plan or as tool in forest management for regeneration, wildfire protection and habitat management or a recognized practice of indigenous people.
10.6 The standard shall require native habitats and natural communities within or close to the production or processing sites are protected.	Assessment report of native habitats and natural communities to determine their presence, due diligence for farmland acquisition, policies and practices for	No comments received		10.7 The standard shall require native habitats and natural communities within or close to the production or processing sites are protected.

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
	managing native habitats and natural communities; employee training materials for identifying and managing for native habitats and natural communities, etc.			
10.7 The standard shall require that endemic, rare, threatened or endangered species permanently or temporarily present on the production or processing sites are protected. Hunting or collecting of these species shall not be allowed.	Analysis on the presence of rare, threatened or endangered species on site, due diligence before land acquisition, employee training on rare, threatened or endangered species identification and management, etc.	<p>1. What of the context where these species are predatory or damaging to the crops in production?</p> <p>2. Criteria 10.7 and 10.8 will be quite difficult for producers because it requires them to be aware of every single species of plant/animal/insect in or around their farming operation. I agree these are important, but it sets a high bar to have this as a minimum requirement for achieving certification. Managing a large area covered by invasive species is quite difficult and costly. There is opportunity to recognize/require the incorporation of in-field and edge-of-field features that support habitat and biodiversity within the agroecosystem, e.g., use of cover crops, diverse crop rotations (3 or more crops), vegetative buffer strips, fields left fallow, plantings that attract beneficial insects or provide forage for pollinators, grass waterways - anything that adds diversity to the agroecosystem will support biological diversity.</p>	1 & 2. The language for this criterion has been adapted to focus on legally protected species.	10.8 The standard shall require that the hunting or collecting of legally protected endemic, rare, threatened or endangered species shall not be allowed within or close to the production or processing sites.
10.8 The standard shall	Information and guidance	No comments received		10.9 The standard shall require

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
require that measures are implemented to prevent alien invasive species from invading areas outside the production or processing sites.	materials on alien invasive species on site, employee training materials on management of alien invasive species, etc.			that measures are implemented to prevent alien invasive species from invading areas outside the production or processing sites.

● **Chapter 11: Animal welfare (for livestock only)**

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
11.1 The standard shall require that adequate measures for animal welfare are implemented.	Animal welfare policy and principles, documents about animal welfare protection including guidance on disease prevention and veterinary treatment, appropriate shelter, management, nutrition, humane handling, and humane slaughter; animal welfare assessment protocols and reports, employee training materials on animal welfare, animal testing policy etc.	Consider including: Should apply to Manufacturing when it comes to Animal testing, as well as for products with animal derivative products.	Added animal testing policy to the implementation examples.	11.1 The standard shall require that adequate measures for animal welfare are implemented.

● Chapter 12: Forestry Practices (Forestry only)

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
12.1 The standard shall require that the organisation supports initiatives delivering forest positive development.	Forest positive policy, participation or support of initiatives delivering forest positive development at landscape/jurisdictional and/or sectoral level.	Why is there a "forest only" section? Does this warrant a sub category for other key segments, such as fresh produce?	1. The forest-specific section addresses critical environmental concerns for this sector, while fresh produce is covered by primary production requirements.	12.1 The standard shall require that the organisation supports initiatives delivering forest positive development.
12.2 The standard shall require that the protective functions of forests such as their potential role in erosion control, flood prevention, water purification and protection, climate regulation, carbon sequestration and other regulating or supporting ecosystem services shall be maintained or enhanced.	Contracting procedures, contractor monitoring and/or evaluation program, contractor's professional licenses, certifications and/or accreditations, etc.	No comments received		12.2 The standard shall require that the protective functions of forests such as their potential role in erosion control, flood prevention, water purification and protection, climate regulation, carbon sequestration and other regulating or supporting ecosystem services shall be maintained or enhanced.
12.3 The standard shall require that the health and vitality of forest shall be monitored.	Measurement and monitoring of forest health indicators such as Crown Condition, Tree Damage, Tree Mortality, Standing Dead Trees, Lichen Communities, Soil Quality,	No comments received		12.3 The standard shall require that the health and vitality of forest shall be monitored.

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
	Non-native Invasive Plants, Fragmentation, etc.			
12.4 The standard shall require that the health and vitality of forest shall be maintained or enhanced.	Forests positive policy. Forest health evaluation reports, Programs to maintain or enhance forest health, etc.	No comments received		12.4 The standard shall require that the health and vitality of forest shall be maintained or enhanced.
12.5 The standard shall require that wood harvesting levels shall not exceed a rate that can be sustained in the long term.	Wood harvest policy. Forest management plans including long-term sustainable harvest levels and measures. Identification of the maximum sustainable harvest, measuring and monitoring indicators comparing net growth with wood harvest (removals).	Forest managers in Ontario prepare forest management plans that consider objectives for wildlife habitat and biodiversity as well as for the supply of wood. They maintain a mix of forest types and ages that ensure forest landscapes remain healthy and diverse to support natural ecological systems and preserve biodiversity over the long term.		12.5 The standard shall require that wood harvesting levels shall not exceed a rate that can be sustained in the long term.
12.6 The standard shall require that structural and biological diversity is encouraged or maintained to enhance the stability, vitality and resilience of the forests to adverse environmental factors and strengthen natural regulation mechanisms.	Forests positive policy. Measurement and monitoring of forest structural diversity and resilience. Programs and plans to maintain structural diversity and natural regulation mechanisms. Forest practices that emulate natural disturbances. Measures to increase fire resiliences such as thinning crowded forests or using prescribed fire. Wildfire	Ontario's public forests are sustainably managed using Ontario's forest policy framework. Specifically, the Crown Forest Sustainability Act requires public forests be managed in a way that conserves ecological processes and biological diversity. This includes using forest practices that emulate natural disturbance, such as fire, while minimizing adverse effects on plants and animals, including species at risk, as well as water, soil, and air.		12.6 The standard shall require that structural and biological diversity is encouraged or maintained to enhance the stability, vitality and resilience of the forests to adverse environmental factors and strengthen natural regulation mechanisms.

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
	protection strategies. Participation in conferences, seminars and training programs about forest diversity and resilience.			
12.7 The standard shall require that degraded forests shall be rehabilitated as far as economically viable.	Forest rehabilitation plans and programs, Reports on rehabilitation programs, Tree planting records, etc.	No comments received		12.7 The standard shall require that degraded forests shall be rehabilitated as far as economically viable.
12.8 The standard shall require that harvesting, processing and transport activities shall be conducted in a way that minimise damage to ecosystems.	Forest management procedures. Training of workers on forest management practices. Reforestation and afforestation policies, programmes and plans.	No comments received		12.8 The standard shall require that harvesting, processing and transport activities shall be conducted in a way that minimise damage to ecosystems.
12.9 The standard shall require that native species and local genotypes are used for forest reforestation/afforestation unless there is clear and convincing justification for using others.	Identification of local species and genotypes. Reforestation and afforestation policies, programs and plans.	No comments received		12.9 The standard shall require that native species and local genotypes are used for forest reforestation/afforestation unless there is clear and convincing justification for using others.
12.10 The standard shall require that afforestation	Reforestation and afforestation impact assessments, plans and	No comments received		12.10 The standard shall require that afforestation does not take place in ecologically important

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
does not take place in ecologically important non-forest ecosystems or in locations which negatively impact ecologically important natural communities, threatened and endangered species, or native natural communities which could be at risk of becoming rare.	programs.			non-forest ecosystems or in locations which negatively impact ecologically important natural communities, threatened and endangered species, or native natural communities which could be at risk of becoming rare.

● Chapter 13: Ecodesign

Draft Benchmarking Criteria	Implementation Examples	Stakeholder Comments Received	SSCI Responses	Final Criteria
<p>13.1 The standard shall require that products and its packaging are designed and packaged to be as readily recyclable and compostable as possible to minimise their environmental impact and stimulate supply chain circularity.</p>	<p>Eco design policies and procedures. Product life-cycle analysis. Product eco design requirements and rules on sustainable packaging.</p>	<ol style="list-style-type: none"> 1. Is it the produce or the packaging that is to be recyclable? 2. Compostable packaging is not readily accepted in many existing organics recycling facilities; it cannot be phrased as equivalent to recyclable. 3. This section should be expanded to require that standard shall require that packaging be selected to minimize the environmental impact (e.g., excessive disposal in landfills, disproportionate fugitive state). Maximizing circularity should be a requirement, while not adversely impacting the sustainability of the packaged product e.g., food safety, food waste minimization, etc. 4. Consider linking this to the Golden Design Rules. 	<p>The criterion and its implementation examples have been amended to include the feedback received.</p>	<p>13.1 The standard shall require that products and its packaging are designed to minimize their environmental impact and stimulate supply chain circularity.</p>