

Public Consultation Synopsis - RSB Standard on Smallholder Group Certification Standard (May 15 - July 16 2014)

Organisation	Region	Document	Description	Suggested Text	Rationale	Guidance	Response from RSB Secretariat
PANGEA	Belgium	Defining Smallholders:	PANGEA very much welcomes this document and its recognition of the importance and significance of smallholder farmers. The detail and thought-process behind the suggested criterion, by which to define a smallholder is useful.			While going by land-size alone would be easier, it is likely that a multi-criteria approach would be better suited and more accurate. It would also account for the regional differences, particularly between Africa and South America. Referring to current systems in place is wise, and will avoid duplication and possible contradictions. Current market access is also a key thing to consider when defining a smallholder. We would agree that land tenure is less relevant to the definition.	We will consider this comment in the course of the standard revision after the testing phase.
PANGEA	Belgium	Smallholder Group Certification Standard:	The record keeping seems straightforward enough, whilst being informative, which is important.			-	None
PANGEA	Belgium	RSB P&Cs for Smallholder Groups	The 'stepwise' approach seems sensible and manageable. Just a question that is should be by year 3 that 'Members are aware of the rights of sub-contracted workers and occupational health and safety requirements and these sub-contracted workers confirm these rights.' Should the food security risks be addressed in the initial year, rather than year 1?				We are checking with the developers to see whether it was a mistake that Food Security shall be addressed in the initial year rather than year 1.
RAISE Health Initiative	USA	RSB P&Cs for Smallholder Groups, Feedstock Production/P4: Human and Labor Rights		Add gender language "...promote decent work and the health and well-being in accordance with the specific needs of men and women workers. Educational materials on general health should also be available to workers."	It is important to recognize throughout the fourth principle that the needs of men and women are not exactly the same. Employers should recognize and address these different needs and work towards ensuring the wellbeing of both men and women workers.		Language to promote gender, health & safety will be addressed in the larger revision of the P&Cs taking place next year.
RAISE Health Initiative	USA	RSB P&Cs for Smallholder Groups, Feedstock Production/C4.c iii: Child Labor		Include access to basic healthcare and health services "...Workers should have access to basic healthcare and health services."	All workers should have the right to their own health and wellbeing. Access to healthcare and health services is essential for workers to be as healthy and productive as possible. Access can		Language to promote gender, health & safety will be addressed in the larger revision of the P&Cs taking place next year.
RAISE Health Initiative	USA	RSB P&Cs for Smallholder Groups, Feedstock Production/C4.f i: Conditions of Occupational Safety and Health		Recommendation: Add educational wording to Criteria i ... "Workers are also provided with educational materials on the dangers and risks involved in their work."	Reasoning: Workers must have educational materials associated with the dangers of their work in order to fully comprehend possible risks of their job and why their protective equipment is necessary. Materials should be in an accessible format for those with little or no literacy skills.		Language to promote gender, health & safety will be addressed in the larger revision of the P&Cs taking place next year.
RAISE Health Initiative	USA	RSB P&Cs for Smallholder Groups, C4.f iii: Conditions of Occupational Safety and Health		Add educational wording to Criteria iii : ... "Workers engaged in working with hazardous materials will also be informed of the potential risks to their reproductive or neurological health."	Reasoning: Workers should be informed of all possible health complications associated with the handling of hazardous substances so that they can make an informed decision about the work in which they are engaging. In addition, this information will allow workers to take proper precautionary measures to protect themselves.	RSB itself, on behalf of its members, should conduct a thorough, science-based review of chemicals and other materials used for adverse effects on reproductive and other health systems and discontinue use or implement a process for phasing out their use	Language to promote gender, health & safety will be addressed in the larger revision of the P&Cs taking place next year.
RAISE Health Initiative	USA	RSB P&Cs for Smallholder Groups, Feedstock Production/C4.g : Ensuring Rights Extend to All Workers		Include wording on the expectations for sub-contractors... .. "including both occupational health and safety and general health of the workers."	Reasoning: Sub-contractors should be held to the same standard as the operators. Therefore, general worker health and occupational health and safety must also be a sub-contractor priority.		Language to promote gender, health & safety will be addressed in the larger revision of the P&Cs taking place next year.

PANGEA	Belgium	RSB GHG Tool Manual-for Smallholder Groups:	Second line of the overview (page 5) is missing the word 'it.' Rudimentary spelt wrong on Page 27 and visible track change on page 29.			Pages 5-7 could possibly be written in a clearer way. Page 7 on the frequency of data gathering – perhaps it could also be clarified how often an audit will occur. Whilst understanding the idea of a sample of smallholders completing the questionnaire, would it not be better for them all to do, and from that the Group Manager can take a sample. Or perhaps this is too much to ask of smallholders. The (2nd) Tip on page 12 is a little hard to understand.	Corrections have been made.
PANGEA	Belgium	GHG Questionnaire for Smallholders:	The reference to the appropriate page numbers of the manual is very practical and user-friendly. A few spelling mistakes on page 3 – its and litter and on page 4 – management.			-	Corrections have been made.