

# SAN/RSB standards comparison

Summary Report

May 2012



## About The Proforest Initiative

The Proforest Initiative is an independent charitable organization with a global reach, supporting better management of the world's natural resources, with a focus on practical solutions. We provide support for the development of sustainability standards, safeguards and initiatives, work on research and policy development, and provide training and capacity building for a wide range of different stakeholders around the world.

The Proforest Initiative team is international and multilingual and with a variety of backgrounds, ranging from industry to academia and NGOs. This allows us to work comfortably with many types of organisations, as well as in a range of cultures. We have in-house knowledge of more than 15 languages, including English, Mandarin, Bahasa Indonesia, French, Spanish and Portuguese.

The Proforest Initiative was set up by Proforest in 2010 to increase the accessibility of expertise and experience to sustainability initiatives, government departments, and non-governmental and civil society organisations and provide a platform for building long-term partnerships with other organisations around shared objectives. As a charity, the Proforest Initiative is registered charity and is overseen by an independent board of trustees.

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## 1 Introduction

Building on a previous field audit comparison exercise in December 2010 in Colombia, the Sustainable Agriculture Network (SAN) and the Roundtable for Sustainable Biofuels (RSB) jointly agreed to commission a series of comparisons of all relevant RSB and SAN standards and policy documents which might form the basis of future formal bilateral system recognition.

This report summarises the first desk-based comparison in this process, which focused only on the comparison of the *production* standards; i.e. standards which apply to the grower/farmer.

## 2 Methodology

The standards documents to be compared were provided by the two schemes. These were:

1. The SAN Sustainable Agriculture Standard (July 2010)
2. The RSB Principles & Criteria for Sustainable Biofuel Production (RSB reference code: [RSB-STD-01-001 (Version 2.0)])

In agreement with SAN and RSB the comparison used an MS Excel comparative framework based on the criteria developed by the Sustainability Standards Transparency Initiative (SSTI) – a project in which both schemes participate. Any other themes covered by either of the two standards but not by the SSTI criteria were included as additions to the framework.

The standards were tabulated against the SSTI criteria. SAN and RSB then provided feedback on this tabulation, checking for omissions or misinterpretations. At this stage, both organisations referenced additional supporting materials, which were also consulted. However, the additional documents were not analysed in detail, as they will be covered in further stages of the comparison.

In those cases where neither one of the standards covered an SSTI criterion, this criterion was deleted.

For each listed theme the requirements of each scheme's standard were then assessed to determine the degree of equivalency. Their level of equivalency was recorded in the spreadsheet and, if necessary, further possible steps for SAN and RSB were outlined.

### Note of caution

Before looking at the results in detail, we would suggest reviewing the following assumptions and observations:

- **Scope of Comparison:** RSB criteria are applicable to different types of operations: feedstock producers, feedstock processors, biofuel producers and biofuel blenders. SAN's standard is for farm-level production. For the purposes of this comparison of *production* standards the comparison considered only the RSB criteria that are applicable to *feedstock producers*, (in practice this is all but two criteria).

- **Raising the bar:** Based on our experience of comparisons for mutual recognition, the approach for the analysis was that where non-equivalence was detected, the suggestion for change focused on the ‘less stringent’ standard being amended to match the ‘stronger’ requirement. It is possible that in some instances the two organisations might find the less comprehensive cover of the other organisation already satisfactory for considering it sufficiently equivalent to their own.
- **Consequences of using of SSTI framework:** The SSTI framework gives a very fine breakdown of topics, which for certain aspects might be creating a lens for comparison with more detail than is helpful, resulting in the highlighting of relatively minor differences. SAN and RSB might consider the overarching approach of both organisations for those criteria sufficient and may choose to accept the differences in the finer points.
- **Inclusion of additional requirements:** Proforest has given equal weighting to all differences between the standards. Therefore, *any* SAN criterion or RSB minimum requirement that was not already covered by the SSTI criteria has been included as additional criterion in the framework. Some of these may be very significant and require considerable work to amend, others may be relatively insignificant.
- **Equivalency of certification systems:** The existence of a non-applicability rule, scoring systems, minimum compliance requirements and geographic restrictions in the schemes creates obstacles to a simple comparison of requirements.
  - **Partial Compliance:** SAN requires an overall 80% of compliance with its criteria (and at least 50% of criteria for each principle). Therefore - with the exception of their ‘critical criteria’, SAN’s criteria may not all always have to be complied with in practice<sup>1</sup>. It should therefore be noted that *de facto* not all highlighted differences which point to RSB making changes to their standard, might be necessary to address, as overall only 80/50% of criteria compliance is required by SAN.
  - **Non-applicability:** Furthermore, SAN has a ‘non-applicability’ rule and specifies that only 47 of its criteria must be evaluated at all times and must not be subject of the non-applicability rule. The non-applicability rule means that *de facto* auditors might not need to assess the remaining criteria depending on the following:
    - The size and complexity of the operation (plantations or smallholder farms)
    - The use or non-use of agrochemicals within the farm
    - The hiring of contracted labour or use of non-contracted family labour
    - The presence or absence of aquatic or terrestrial ecosystems within the farm
    - The presence or absence of infrastructure within the farm.
  - **Geographic applicability:** RSB principles 5 and 6 apply only to regions of poverty and food-insecurity respectively, whereas SAN’s principles apply to all operations irrespective of geographic location. Again this makes direct comparison difficult.

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<sup>1</sup> These conclusions are subject to further analysis during the phase of certification system-comparison

- **Progress requirements:** The RSB progress requirements raise an issue of timing, as they require compliance only within 3 years (as opposed to compliance from the start). The analysis details when progress requirements are referenced and points out this 3 year gap in compliance.

Equivalency of the certification systems is closely related to equivalency of standards. It is recommended that this comparative analysis is carried out in the next phase of Proforest’s work for RSB & SAN.

### 3 Summary of results

Based on the assumptions outlined above, the two production standards showed the following levels of equivalency:

- 30% of full equivalency, where no actions are needed (or, in some cases, actions already addressed previously also result in equivalency with the point in question)
- To achieve mutual recognition
  - 39% of non-equivalencies could be addressed by RSB adjusting their standard to include additional or stronger requirements (or SAN ‘lowering/simplifying’ theirs). 16% of these changes would only require minor additions.
  - 12% of non-equivalencies could be addressed by SAN adjusting their standard to include additional or stronger requirements (or by RSB ‘lowering/simplifying’ theirs). 19% of these would only be minor changes.
- In the case of 19% of non-equivalency, we recommend further study of issues, discussions amongst the two organisations or actions by both. Further details on each of these categories of equivalency are given below, and in the attached spreadsheet.

#### 3.1 Full Equivalency

30% of topics do not require any further actions. They are either fully equivalent or will be once actions for other topics are addressed.

Table1 Full Equivalency

SSTI No <sup>2</sup>	Criterion
S001	Ecosystem integrity (conservation and restoration, ecological corridors, buffer zones)
	Water depletion
	Criteria for use and management of water resources
S014	Water quality management plan
S016	Criteria for disposal of water
	Criteria for legal use of water
	Criteria for community water use

<sup>2</sup> If blank additional criterion introduced for SAN/RSB

<b>S022.2</b>	Air pollution
<b>S022.3</b>	Soil pollution
<b>S029</b>	Criteria for the use of non-renewable energies (if S028 is addressed)
<b>S030</b>	Criteria on efficiency of energy use & mgmt policies (if S027 addressed)
	GHG emissions: criteria on legal compliance
<b>S034</b>	GHG: Sequestration of green-house gases: general principle
<b>S035</b>	Criteria relating to soil or tree sequestration
<b>S039</b>	Chemicals: List of materials authorized
<b>S040</b>	Prohibition of all types of chemicals (if S038 is addressed)
<b>S042</b>	Chemicals: synthetic inputs, fertilizers and pesticides (if S038 is addressed)
<b>S043</b>	Chemicals: Natural inputs, fertilizers and pesticides (if S041 addressed)
<b>S051</b>	Criteria for GMOs management system (if S050 addressed)
<b>S052</b>	Criteria for risk prevention with regards to GMOs (if S050 addressed)
<b>S046</b>	Soil conservation/erosion
<b>S047</b>	Soil quality
<b>S048</b>	Soil productivity
<b>S049</b>	Soil nutrients/fertility
	Criteria on labour laws
<b>S053</b>	No forced labour (ILO 29 & 105)
<b>S057</b>	Conditions of employment: general principle
<b>S064</b>	Pensions and social security benefits
<b>S069</b>	Freedom of association (ILO 87)
<b>S070</b>	Collective bargaining
<b>S073</b>	Criteria relating to safety at work (ILO 184)
<b>S076</b>	Safe work environment
<b>S079</b>	Healthy work conditions
<b>S089</b>	Criteria relating to the rights of indigenous peoples (ILO 169)
<b>S083</b>	Criteria relating to gender policies and best practices
<b>S098</b>	Criteria relating to management systems in place
<b>S102</b>	Compliance with local social and environmental laws

### 3.2 Minor changes

10% of topics overall need minor changes, e.g. expansion of applicability to feedstock producers (RSB) or detailing a concept already supported in the principle description as a criterion (SAN).

Table 2 Minor changes

SSTI No <sup>3</sup>	Criterion
S017	Waste management criteria
S018	Use of waste materials
S019	Criteria for reducing, reusing and recycling waste
S022.1	Water pollution
S025	Disposal of waste
S055	Worst forms of child labour (ILO 182)
S091	Criteria relating to specific services to local communities

### 3.3 Level issue

This refers to RSB’s progress requirements and concerns 3% of topics. An operator has to comply with these within the first three years of certification. In order to be fully equivalent to SAN, they need to require compliance from the beginning, or, alternatively, SAN may consider the 3 year compliance phase still within the acceptable range.

Table 3 Level issue

SSTI No <sup>3</sup>	Criterion
	Reversal of water degradation
S013	Criteria to reduce, reuse and/or recycle water resources
S022.1	Water pollution
	Vegetative ground cover

### 3.4 RSB actions

These are the criteria RSB could consider addressing in order to be fully equivalent to the SAN production standard (39% of all topics). It should be borne in mind that several of the changes are due to existing restrictions of compliance scope to regions of poverty or food-insecure regions (RSB principles 5 and 6). Also, this assumes a 100% compliance with all SAN criteria, when SAN requires 80% (and 50% within each principle) and furthermore disregards the possibility of non-applicability.

Table 4 RSB actions

SSTI No <sup>4</sup>	Criterion
S002	Habitat/eco-system

<sup>3</sup> If blank additional criterion introduced for SAN/RSB

<sup>4</sup> If blank additional criterion introduced for SAN

<b>S003</b>	Criteria for reforestation
<b>S004</b>	Criteria for deforestation
<b>S006</b>	Impact assessment for new production
<b>S027</b>	Criteria to reduce use of energy resources
<b>S028</b>	Criteria relating to the use of renewable energies
<b>S041</b>	Criteria for Integrated Pest Management IPM / ICM
	Fumigation
	Agrochemical inventory
<b>S044</b>	Chemicals: Equipment/training
	Agrochemicals transport
	Soil/foilage sampling
<b>S054</b>	No use of physical violence, intimidation etc.
<b>S056</b>	Minimum age (ILO 138)
	Direct hiring and employment
	Criteria for end of contract
<b>S062</b>	Criteria relating to the employment of seasonal and partial-time labour resources
	Payroll and job description
<b>S068</b>	Maximum number of working hours
	Overtime
	Influencing of workers
	Criteria on provision of training on the standard
	Emergency programme
	OH &S programme
<b>S075</b>	Training on safety issues
<b>S077</b>	OH&S: Safety equipment & emergency kits
	OH&S: Workshop and storage facilities
<b>S078</b>	Handling chemicals
	Medical check-ups
<b>S080</b>	Workers' access to safe drinking water
<b>S081</b>	Workers' access to sanitary facilities at work (showers/wc/...)
<b>S082</b>	Workers' access to medical assistance/insurance
<b>S088</b>	Cultural and religious rights: general principle
	Criteria relating to protection of community from farm impacts
	Criteria relating to protection of community resources and infrastructure
<b>S093</b>	Local hiring and purchasing
<b>S095</b>	Criteria relating to the promotion/enhancement of education
<b>S096</b>	Criteria relating to the promotion/enhancement of medical care

<b>S097</b>	Criteria relating to the promotion/enhancement of housing and sanitary facilities
	Continuous improvement
	Criteria for service providers
	Implementation: upper management system awareness of standard
	Criteria related to keeping records to prove compliance with the standard
	Criteria related to keeping records on social and environmental management system

### 3.5 SAN actions

These are the criteria SAN could consider addressing in order to be fully equivalent to the RSB requirements (12% of topics).

Table 5 SAN actions

<b>SSTI No<sup>5</sup></b>	<b>Criterion</b>
	Aquatic ecosystems
	Hazardous micro-organisms
<b>S062</b>	Criteria relating to the employment of seasonal and partial-time labour resources
<b>S071</b>	No discrimination at work (ILO 111)
<b>S086</b>	Land title and use rights
<b>S087</b>	Free, prior and informed consent
	Criteria on engagement with vulnerable groups in the community
<b>S092</b>	Criteria for the consultation of local communities
<b>S094</b>	Criteria relating to food security issues
<b>S096</b>	Criteria relating to the promotion/enhancement of medical care
<b>S103</b>	Economic viability
	Impact assessment
	Availability of documentation
	Production efficiency
	Continuous improvement
	Access and benefit sharing
	Intellectual property

<sup>5</sup> If blank additional criterion introduced for RSB

### 3.6 Other scenarios

In order to address the lack of equivalency for the following topics a range of suggestions is given, including either/or options for certain topics, actions required by both or additional clarifications by the organisations and discussions of specific issues. This concerns 19% of the incompatibilities.

Table 6 Other scenarios

SSTI No <sup>6</sup>	Criterion
	Criteria for harvesting wild and threatened species
<b>S009</b>	Criteria for conversion of land and clear-cutting non-productive areas
<b>S005</b>	Criteria for forest conservation
<b>S010</b>	Wildlife management
	Crop barriers
	Natural water courses
<b>S013</b>	Criteria to reduce, reuse and/or recycle water resources
	Reversal of water degradation
	Criteria on irrigation
	Septic tanks
<b>S026</b>	Criteria for use of fire (land clearance)
	Criteria for use of fire (non land clearance)
	Criteria for education on waste
<b>S038</b>	Prohibited list of chemicals
<b>S045</b>	Chemicals: Storage/disposal/waste
	Technology use
	Hazardous technology
<b>S050</b>	Prohibition of GMOs principle
	Vegetative ground cover
	Soil/foilage sampling
<b>S060</b>	Transparency of employment practices
<b>S063</b>	Timely payment of wages
<b>S065</b>	Minimum wage
<b>S067</b>	Equal remuneration (ILO 100)
	Criteria on mixing certified and non-certified products

For further details and description of actions and possible scenarios, please see the attached Excel file.

<sup>6</sup> If blank additional criterion introduced for SAN/RSB

## 4 Recommendations for next steps

1. As a next step it is recommended for the two organisations to discuss a few issues, which were identified to likely be more challenging to harmonize than most. In particular GMOs, land conversion and agro-chemicals. It is suggested that SAN & RSB share with each other some of the thinking behind the inclusion of these requirements in their standards, in order to identify scope for modifications. This will allow for the early identification of any potential ‘show stoppers’ for which strategies can be developed early on.
2. Immediate areas of suggested further comparative study as next steps in the process of mutual recognition:
  - a. **Certification systems:** several issues that were highlighted in the comparison are due to differences in the certification systems (see point on ‘equivalency of certification systems’ in the ‘Note of Caution’ section). It is therefore recommended that the comparison of certification systems forms the next step of the comparison.
  - b. **Chain of custody standards:** this already came up in the producer standard comparison and will need to be addressed as crucial element of the schemes.
  - c. **Topics from the standard comparison:**

Table 7 Next topic areas to analyse

SSTI No <sup>7</sup>	Criterion
S007	HCVA definition
	Criteria to reduce GHG emissions
S032	Criteria to monitor/restrict carbon emissions
	Criteria on social policy
	GMOs

<sup>7</sup> If blank additional criterion introduced for SAN/RSB

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