

RSB PRINCIPLES AND CRITERIA

REVISION PROCESS 2022



1. GENERAL COMMENTS ON THE P&C APPROACH pt. 1

Progressive compliance

- A system can be suggested if it does not compromise the integrity and robustness of the standard.
- The proposal must clearly identify and justify which requirements will have longer time frame limitations and what these time frames will be.
- Targeted at smallholder farmers and suggestions to tie to incentives without specifying the type of incentive.

Standard benchmarking

- Suggestions pivot:
 - Evaluating which existing industry and private sector standards are equivalent to specific RSB P&C requirements (e.g. ISO 9001 = Requirement 2.2.1)
 - to pass or approve the requirement just by providing evidence that the industry standard has been verified.
 - Benchmarking RSB against other standards – to include requirements that are still not in the current version.
- Take existing standard certifications and top up with RSB requirements for easier certification process.

Other comments

- Communication/positioning: Improve RSB positioning as encompassing products other standards do not cover (e.g. PVC and plastics).
- Impact-driven approach: Develop indicators for requirements on which performance can be tracked and reported as results from Standard implementation.



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1. GENERAL COMMENTS ON THE P&C APPROACH pt. 2 (CLIMATE CHANGE APPROACH IN THE P&C)

General climate change approach merged with Principle 8 ('Soil')

- Suggestion to embed a Climate Change Criteria in all Principles that allows Companies to show on an individual basis different climate mitigation or adaptation processes linked to the principles. Review afterwards the results to determine the timeframe for achieving compliance in this aspect.
- Describe guidance on methods to increase soil carbon and soil quality. Impact on carbon farming activities to reduce GHG emissions should be considered (for example, recognising the potential of regenerative agriculture through balanced nutrition and improved manure activities like recycled fertilizer and intentionally added biocarbon –biochar- as well as cover cropping, crop rotation, minimum tilling, etc.). IPCC methodology and modelling should be accepted in the future as a verification to measure soil carbon activities. P&C should focus on defining the rules and verification methods for the base scenario for regenerative soil activities (both quality and quantity).

Include 3 additional tools:

- - The CMIP experiments, which were used for the IPCC 5th Assessment report when for the first time the matrix of RCPs and SSPs has been introduced. <https://www.wcrp-climate.org/wgcm-cmip/wgcm-cmip5> They are also used by the Global Agro-Ecological Zones (GAEZ) model to estimate bio-physical impacts of future climatic conditions on agricultural yields etc. Currently, CMIP5 are still being used, but CMIP6 experiments are slowly becoming available and are intended to be used in the next version of the GAEZ.
- - Task Force on Climate-Related Financial Disclosures' technical supplement (a comprehensive toolkit which provides a thorough explanation of climate projections and scenario-planning and provides links to many additional sources).of a P.O.
- he new P&C should follow the updated IPCC 2020 Climate zone map categorization to define the climate zone categories.

Other comments

- Develop a 'resilience' indicator / tool, that Includes a bundle of metrics that are used to demonstrate resilience.



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2. PLANNING, MONITORING AND CONTINUOUS IMPROVEMENT

Principle scope

- “...consultative impact assessment and management process and an economic viability analysis”. Assess if criteria and indicators should be developed for this aspect.

Risk screening tool

- Review additional specialist Impact Assessments in the Risk Screening Tool where they might’ve been left out in key questions.
- Improve guidance on endangered species as this can be difficult to assess in terms of the impact and responsibility of a P.O..

ESMP

- Guidance could be improved on: 1. Differentiating: 1.1. Upstream vs Downstream; 1.2. Dissemination approach on E & S findings; 1.3. Progress dissemination phases (e.g. i. baseline; ii. action plan phases; iii. cumulative phases; or other predefined phases). 2. Allow ESMP scoping specificity according to variability on the ground, particularly between farms, where significant differences might appear (e.g. in deforestation or land erosion for example).
- Principle 2 | 2a. | 6 makes refers to “... in accordance with the RSB ESMP Guidelines (RSB-GUI-01-002-05)...” Clarifications on the indicator are needed as the ESMP is part of the Impact Assessment Guideline.
- Impacts of agriculture could potentially go beyond farm boundaries. A landscape approach could be required in operations with multiple sites.
- Additional references: Climate Vulnerability and Capacity Analysis Handbook (CVCA) by the Care Climate Change and Resilience Information Centre, the Participatory Capacity and Vulnerability Analysis (PCVA) by Oxfam, Mercy Corps' Vulnerability and Resilience Assessment Initiative to Counter Violent Extremism.
- FPIC: Consistency on the wording and application of FPIC needs to improve. Create a clear guideline, specifying when it is a requirement and defining how it applies differently for different supply chain stakeholders (e.g. farmers, vs traders, vs industrial operators, etc.).



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3. GREENHOUSE GAS EMISSIONS pt. 1

Principle scope

- Principle should be extended to cover not only biofuels, but ideally all biomass supply and biofeedstocks. At least, all bioenergy should be covered plus bioplastics. Minimum GHG emission reduction quota and respective benchmarks (for coal, natural gas, and oil) should be established against which the GHG reduction quota are to be determined.
- Attribution: scope / boundary alignment with Greenhouse Gas Protocol land-based emissions and land-management. Align ATTRIBUTION approach with credible GHG Protocol accounting, where mass balance may become feasible in future. Consider RSB recognising 3rd party attributional accounting methods or develop own (i.e. outcome based accounting and give guidance for correct use).
- Biochar. European Biochar standard - certifies biochar that is a by-product of cashew shell pyrolysis. Selling credits based on the use of biochar credits and having RSB recognition.

GHG calculation

- Update list of accepted GHG calc methodologies. Consider whether any newer ones need adding. WWF and WRI have guidance on corporate GHG accounting for land use change and identifying mitigation pathways for the agriculture, forestry, and other land-use (AFOLU) sector.
- Suggested reference: Cool Farm Tool is an open gas emission calculator that farmers and extensionists can easily input the information to calculate the emissions.
- 3.b.1 - the second P3.b.1 we need to correct the numbering) it confirms that default values may be used "Default Values set by the EU Renewable Energy Directive, Annex V (2009/28/EC) if the specifications as defined by the Directive are met (e.g. feedstock, process, process energy, country of origin)"
- EU Renewable Energy Directive Methodology is flawed. Ensure RSB calculation methodology is robust and credible.



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3. GREENHOUSE GAS EMISSIONS pt. 2

GHG calculation II

- 3.b.2. Reference to Natural forests (Accountability framework definition) being added to the prohibited list for energy should be referenced here, as per feedback to the amendments to the woody biomass standard. Where residues from non-natural or primary forests are allowed, operators must report on the full scope of emissions from the stack in order to prove it is a lower footprint than fossil. Update statement about prohibitions on forest biomass.
- Minimum GHG reduction quota should be set well above 60%: = 85% for solid biomass vs. coal or oil | 75% for liquid biofuels vs. oil | 70% for biogas/biomethane vs. natural gas | 70 % for bioplastics vs. fossil plastic (coming from a mix of natural gas and oil) | RSB should also aim at including biogenic carbon sinks in its scheme, especially biochar cs.



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4. HUMAN RIGHTS

Principle consistency

- For operations running in developed countries, labour rights are highly regulated hence I would make the principle 4 review not applicable for operations in these countries.

Gender issues

- Industrial Sector – Chemical Company: suggestion to remove asking for the number of men and women working in a company. Additionally, this question is covered in ESG reports. There should be a section for “others” besides men and women as it has become a legal topic in some countries such as Germany.

Indicator consistency

- Correct "4.e.4. The maximum number of regular hours worked per week must not exceed 48. Workers may work overtime which shall be voluntary, but total working hours shall not exceed 80 per week." Expectation is maximum 60 hours per week, refer to the RSB Guidance clarifying it.
- 5.a.3: IHDI per country level? In case of large extension countries, make sense per state or region?
- 5.b.1. Data for rural poor women in regions of poverty shall be disaggregated in the baseline social surveys to assist with the design of special programs for the targeted people...." (In the current version applicable to biomass producer and industrial operator). There are cases where principle 5 is applicable (due the country IHDI), but the industrial operator is not located in the rural areas or has not any link to rural communities, creating confusion during implementation.
- Shared responsibility - ensuring that downstream (big) companies invest in upstream communities - responsibility to be shared along the supply chain. E.g. baseline certification paid for by producers; higher-level certification that verifies positive impacts is paid for by brands, who can then make direct claims to those impacts - impacts must be local & contextualised.



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7. CONSERVATION

Principle scope

- Suggest adding to the principle "...and increase in carbon stocks accumulation (soil and/or forest)" for feedstock producers and their supply chains.

Indicator opposition

- "No conversion" areas include forests that had such a status after 2008. We agree that the production of feedstock for renewable fuels should not result in conversion of high biodiversity areas. However, current approach blanket penalizes previously forested land that had a small area of conversion. The 2008 baseline date does not take into consideration the 20-year horizon for which land use impact is calculated.

Indicator consistency

- 7.a.6 Add Ancient and Endangered forests and High Carbon Stock forests as mapped in <https://canopyplanet.org/tools/forestmapper/app> to the prohibited; no conversion list
- 7.a.7 "Areas that contain conservation values of global, regional or local importance or serve to maintain or enhance such conservation values shall only be used if adequate management practices maintain or enhance the identified conservation values" is too vague.
- 7.d.4. Any ecological corridor destroyed after 1st of January 2004 on or near the operation site and for which the Participating Operator is directly accountable shall be restored". Some issues related to the indicator: the RSB cut -off date is January 2008, why for the the corridors it is January 2004? It requires the PO to do two evaluations of land use changes and auditor to check both: one for 2008 and other for 2004. Other point: it is not objective to say "near the operation site".....what is "near"? And also it is difficult to identify if the PO was responsible directly for the destruction of corridors in 2004.
- 7.e.1 Motion to ban invasive species

Improve definition

- 7.a.5 Improve definition of degraded and abandoned land. We recommended that together of the revision of the no-go and conversion areas P&C will describe more precisely the different land use types and give further guidelines how the potential positive Land Use Change GHG emission reduction and improvement on biodiversity can be considered. Further define evidence needed to allow the usage of the bonus of 29 g CO₂eq/MJ (mentioned in RED).
- 7.a.6 Define "zero deforestation" in Amazon Biome independent of local/country legislation.



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8. SOIL

Principle scope

- Include in the revision of Principle 8: Soil and consider ways to incentivise the use of regenerative agricultural practices to improve soil health and soil carbon accumulation.

Soil carbon, climate change and ESCA

- RSB should form an ESCA (emission saving from soil carbon accumulation) subgroup on soil organic carbon.
- Include Comet-Farm tool and the RothC model. Review Argonne National Lab embedding soil carbon into GREET calculations. FAO document on measuring and modelling soil carbon is a good resource for ensuring the frameworks used are consistent with current scientific practices. Finally, the climate modelling and farm-level vulnerability assessments are big topics on their own, with WCRP Coupled Model Intercomparison Project (CMIP).
- Support utilization of the ESCA factors from IPCC 2019 model to be used in continuous verification of soil carbon after baseline is reliably defined.
- Versatile and parallel use of land and ecosystem services should be acknowledged and further encouraged in P&C to increase the total productivity of the land and have a potential positive impact on carbon storage and enhanced soil resilience. In addition, the interpretation of the primary vs secondary land use should be defined more in detail in P&C. It is not clearly defined how the economic benefit vs. the area and time used for each land use impact the allocation. Example of versatile land use: Intercropping, mechanism which should be recognised also in the P&C to push towards crop rotation to minimise monoculture. Improve definition of primary (main) crop and secondary crops more in detail. I.e., secondary crop could be excluded from the food cap if it can be proved that it is not triggering demand for additional land use.

Indicator opposition/incentive

- 8.a.3 Allowing for the use of forest residues minimises future soil organic carbon. Forest residues should be seen as future soil carbon and left in the forest and therefore added to the prohibited list. Please add some specific and rigorous language about the need for soil carbon conservation in instances where waste residues may be removed for use in various end products. In the case of residues from crops and forestry, all fibres should be tracked back to the field or forest of origin.
- 8.a.3 PRODUCER INCENTIVES: Regarding the increment of productivity in agriculture my suggestion is to implement the revaluation of residues to generate value-added products as well as biofuels that can be used for the same producers.



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11. TECHNOLOGY USE

Indicator opposition

- 11.b.1 Prohibit GMOS.
- 11.d.3 Manufacturer's safety instructions for the storage, handling, use, and disposal of chemicals shall be followed.

Indicator consistency

- 11.a.1. When complying with and auditing against this criterion, proprietary technology shall be protected from competitors and intellectual property rights shall be respected. It is not an indicator to the criteria and not clear if it should be just a guidance. Even as a guidance, it does not make sense, as audit is covered by confidentiality agreements.
- 11.e.3. For new and expanding operations, the design of operations shall integrate the necessary infrastructure for safe burning of processing waste and by-products in line with criterion 10b. What is the objective of this indicator? Does RSB require operators to burn wastes and by-products as the only option for disposal? Or it means when operators select burning as an option for final disposal of residues (they can have other alternatives), they shall develop the adequate infrastructure?
- 11.e.4. For existing operations, a strategy shall be set to develop the necessary infrastructures for safe burning of waste and by-products in line with criterion 10b". What is the objective of this indicator? Does RSB require operators to burn wastes and by-products as the only option for disposal? Or it means when operators select burning as an option for final disposal of residues (they can have other alternatives), they shall develop the adequate infrastructure?

Improve definition

- 11.d.2 About the list of prohibited chemicals: can the list of pesticides legally allowed by country be used? The legislation varies a lot from a country to other and some countries really allow the use of high-risk chemicals or do not have strong regulations in place.
- 11.d.5 Regarding the use of technology, inputs and management of waste, it is important to implement strategies for the improvement of revaluation processes (e.g. process intensification, energy integration, renewable energies). All these tools must be analysed considering cost / benefits in terms of social, environmental and economic impacts.

