Opinion on animal and plant proteins

- **At the request of the Minister for Climate and Energy, Mr Magnette, in a letter of 28 October 2008**
- **Prepared by the ad hoc workgroup on a sustainable food system**
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Abstract

- *To ensure a sustainable food system, it is particularly important to have a clearer view of the production and consumption of proteins in our food systems. The world is faced with the prospect of securing a balanced diet for nine billion people within the capacity of the world ecosystem by 2050. It therefore comes down to a transition of the protein production and consumption systems to a system with greater ecological and social sustainability and more guarantees for the economic players in the chain. A sustainable target picture entails that a food system has to be organised at European level by 2050 that is in large measure self-supporting. For this to be achieved, EU policy and international trade agreements must be steered in this direction.*
- *To achieve this goal, the council advocates a protein transition as part of a general transition to a more sustainable agriculture and food system. The protein transition is a deliberately organised process, based on active cooperation between governments, economic players and the civil society.*
- *A first pillar of the protein transition is the transformation of the current system of importing plant proteins. This system must become more sustainable. The council proposes a number of principles for achieving a more sustainable system and calls for new initiatives to be taken or existing ones to be improved and enhanced.*
- *A second pillar of the protein transition is geared to production and consumption, and endeavours, pursuant to a balanced and healthy dietary pattern, to shift consumption from animal proteins to more sustainably produced plant proteins. In this connection, the council makes a number of concrete proposals concerning supply and demand.*
- *Finally, the council makes certain recommendations on how to organise the protein transition. For instance, it calls on the federal government to take the initiative for a national cross-policy platform where the protein transition process is set in motion and stimulated further.*

1. Context

[a] On 26 March 2010, the council approved its *sustainable food system opinion.* At the request of Minister Magnette, that opinion provided a definition of a sustainable food system and set out policy proposals for a transition to such a system.

[b] The *sustainable food system opinion* does not go into the protein issue. In that opinion, the council undertakes to conduct an internal debate in 2010 and to come up with an additional opinion, particularly on the import of plant proteins and the production and consumption of animal proteins. This *animal and plant protein opinion* is the upshot of that debate.

[c] The *animal and plant protein opinion* is expressly in line with the *sustainable food system opinion.* It reconfirms the contents thereof and develops additional elements, specifically about the protein issue.

2. Opinion

2.1. General framework

[1] To ensure a sustainable food system in the long term, it is particularly important to have a clearer view of the production and consumption of proteins in our food system. The world is faced with the prospect of securing a balanced diet for nine billion people within the capacity of the world ecosystem by 2050. It is therefore important to pay sufficient attention to protein production and consumption systems, including decent employment. Some systems increase the pressure of food production on the environment and can thus contribute to reaching the limits of sustainability of the world food system faster. Depending on the production system and the location of production, shifting from plant sources to animal proteins can have a considerable impact on water, energy and land use. If the land is not suitable for plant production for food, then it should be turned over to other –if possible several – uses, such as for animal production, the promotion of biodiversity and as a water buffer or as open space in the landscape. If only the quantity of proteins produced per hectare is taken into account, the yield of plant protein will be higher in most cases. But the overall sustainability of the system depends also on specific circumstances. Mixed companies have a number of advantages for some aspects of sustainbility compared to specialised companies. Cooperation between specialised companies situated next to each other can address such sustainability aspects. Protein consumption also plays an important role in a balanced and healthy diet. The key question is: how can a balance be reached between the food requirements and the capacity of the environment on the one hand, and the effective compliance with international standards (particularly those of the International Labour Organisation) on the other.

[2] The problem differs depending on the existing consumption pattern. There is often an overconsumption of animal proteins in the dietary pattern of the Western world, including in our country, with regard to the recommendations of the High Health Council. It is worth pointing out nonetheless that consumption is lower than recommended in some age and population groups. In developing countries, on the other hand, there is often underconsumption of proteins because of poverty. The question arises as to what can the share of food of animal origin in human consumption be in the long term, without exceeding the limits of the globe's ecological capacity and with a view to maintaining a healthy and balanced diet for the population.

[3] A dietary pattern with a high share of animal proteins cannot be extended to a world population of 9 billion people. A great deal of research is being conducted on the precise scope of this impact of animal production on the earth's capacity, therefore on the question as to where the limit of sustainable food production lies, but no scientific consensus has been reached yet. There is, however, agreement on the nature of the problems. Some systems can be more sustainable and have a more positive impact on the environment and on biodiversity. However, a sizeable portion of the world's animal production chain contributes, through various practices – at times directly, at other times indirectly – to deforestation, uses large quantities of water and land, and also makes a significant contribution to the greenhouse effect and the loss of biodiversity. In a world where demand for land and raw materials by sectors other than food supply can only increase, this can lead to sharp conflicts that can be dangerous for the food supply and also for the economic position of the different players in the food production chain. A combination of more efficient, appropriate and justified production, a reduction of losses in production and consumption, and possible changes in the dietary pattern (in striving for a balanced diet) offers the best prospects for all stakeholders.

[4] A sustainable target picture entails that a food system has to be organised on a feasible, continental scale (at the European level in our case) by 2050 that is in large measure self-

supporting. In such a model, Europe is in large measure capable of producing the necessary plant and animal proteins independently to guarantee a full, healthy and balanced food package for all citizens within the ecological capacity. To that end, imports of proteins from other continents are being scaled down. The different components of EU policy and international trade agreements should fall in line with this vision and all players in the chain should be guaranteed an income they can live on, based on the principle of a fair price for a fair product.

2.2. Towards a protein transition

[5] The council advocates a protein transition as part of a general transition to a sustainable agriculture and food system. Such a supervised transition is necessary to keep the impact of our food system in Europe and the rest of the world within the ecological capacity in the long term, so as to continue to guarantee a healthy and sustainable food supply to all citizens, to ensure that the position of the economic players involved (in agriculture, the food industry and trade) is guaranteed in optimal fashion, to guarantee decent work, and to contribute to just North-South relations in a world where resources are becoming scarcer.

[6] The protein transition is a deliberately organised process, based on active cooperation between governments, economic players and the civil society. General objectives and target pictures are discussed in that context for the production and consumption of proteins on the basis of scientific data. At the core of this process is the effort to shift, within a balanced and healthy dietary pattern, consumption from animal proteins to more sustainably produced animal proteins and to – likewise sustainably produced – plant proteins. The deployment of appropriate policy instructions geared particularly to a just internalisation of external costs will play a role here. Furthermore, efficiency and technological innovation processes must be stimulated so that they can improve the production chain and stimulate the development of new products. All possibilities must be concurrently explored to involve consumers as allies in the protein transition. Straightforward information and the active promotion of healthy, balanced and sustainable dietary patterns play an important role in this process.

[7] Given the importance of the societal challenges relating to the production and consumption of proteins, it is vital to place the protein transition process in a clear and ambitious long-term perspective. The council consequently advocates 2050 as such a perspective which must set far-reaching social changes in motion. Measures must however be taken in the short term in order to achieve this goal. Existing measures may moreover be continued and where necessary enhanced, and initiatives or new measures must be taken.

2.3. Import of plant proteins

[8] An important component of the protein transition is the transformation of the current plant protein import model. The aim must be to make that model more sustainable (at world and national level), with clear objectives set in time. Important principles include:

- Full compliance with all international, national and local regulations in force. World trade agreements that prevent a fully-fledged domestic production of proteins for feed must be adapted.
- Decent work (in particular, compliance with the ILO conventions, decent income).
- Just relations with local communities.
- Ecological responsibility (in particular combating environmental pollution and exhaustion, reduction of greenhouse gas emissions and promotion of carbon uptake, protection of biodiversity).
- Good architectural practices (in particular sustainable water use, protection of natural vegetation, improvement of soil quality, sustainable crop protection).
- Guarantee the economic viability of all players in the production chain.

[9] The Council notes that various initiatives are being developed or planned (such as RTRS or Pro Terra) geared to contributing, through the voluntary certification of soybeans, to another plant protein import model. These initiatives form an indication of the commitment of a number of actors in the production chain to that end. The Council accordingly recognises that the RTRS[1] model contains positive elements and can help to overcome the current problems. There is no consensus on the model in itself at this time, however. To arrive at a widespread certification system for soybeans, a number of differences between the players will have to be ironed out and the initiative must gain broader representation.[2] The Council must stimulate the various actors to develop the dialogue on this issue within an appropriate framework. In addition to voluntary initiatives such as RTRS and Pro Terra, the Council underscores that the government must also play an important role in making the soybean chain sustainable.

[10] Various studies and measures to increase the production of plant proteins in Europe, with the active involvement of the sector, are important initiatives that deserve further support. The council calls on the sector and on the government to continue along this path and to pursue the efforts within a global protein transition framework. Involving all stakeholders actively in the charting of the next steps in the transition can only strengthen the process. In this connection, the government can plead actively for international trade agreements that also support European protein production.

[11] The protein transition should set a goal for a European model of feed production by 2050 that is in large measure self-sufficient, and thus not highly dependent on the import of plant proteins from other continents, so that the sector will be less subjected to the volatility of the international markets.

2.4. Production and consumption of proteins

[12] Another important component of the protein transition is to endeavour, pursuant to a balanced and healthy dietary pattern, to shift consumption from animal proteins to more sustainably produced animal proteins and to – likewise more sustainably produced – plant proteins. The platform of all stakeholders in the protein transition must produce a coherent package of policy strategies combined with objectives in the short, medium and long term – with a chain approach as the point of departure at all times.

[13] The council supports good (legal and other) initiatives and practices being already developed in this connection, and is encouraging the partners involved to take further initiatives. The council is consequently pleased with the “protocol of cooperation for regular work and fair competition in the meat sectors” recently concluded by the social partners in the meat industry, and expresses its support thereto. Out of concern for the image of the sector and the social situation of the workers involved, the undersigned parties wish to engage, together with the government, to combat non-compliance with legislation in general and with social legislation in particular. This protocol sets out the main lines of a framework that the social partners must work out further, together with the Belgian governmental authorities and in consultation with European players. In this way, all parties are endeavouring for legal security for employers and employees alike.

[14] To be efficient, the various policy strategies must be geared to supply and demand. An integrated and coordinated strategy is consequently needed geared concurrently to producers, processors, traders and consumers, one which anticipates and strengthens market opportunities. The initiatives proposed below are related and complementary and must be developed as a whole.

[1] Annex 1
[2] Annex 2

[15] As regards the supply side, the council calls for the following lines to be developed and strengthened:

- Concrete measures to promote the domestic production of proteins, including initiatives that lead to an adaptation of international trade agreements.
- Research programmes for production of plant proteins for feed and for human consumption in the EU.
- Promotion of production of feed rich in protein.
- Research programmes and pilot projects that can make the shift from plant to animal proteins more efficient.
- Further research into the real environmental impact of the various protein products through the entire chain, with attention to direct and indirect effects.
- Support for the development of sustainable food products of animal origin.
- Research into the social impact of the current production method and the social consequences of the different transition scenarios.
- Support for research programmes and pilot projects that can minimise losses in valuable raw materials in the different links of the production chain.
- Further talks on the European policy towards the possible renewed authorisation of the use of carcass meal for feed under strict conditions, excluding cannibalism and limited to pork and poultry.
- Setting clear standards at the relevant policy level for sustainable animal and plant products.
- Support programmes for the development and marketing of products of plant origin.
- Promotion of sustainable protein products in the distribution sector.
- Research into economic instruments (e.g. instruments geared to the just internalisation of external costs, subsidies, fiscal and parafiscal instruments, etc.) that can redirect the production and marketing of sustainable protein products.
- Knowledge development and promotion of a responsible approach to proteins in hotel schools, cooking programmes and training for buyers.
- Guaranteed, quality supply of vegetarian meals in all restaurants subsidised by the government -- an issue that is gaining in awareness.

[16] As regards the demand, side, the council calls for the following lines to be developed and strengthened:

- Promotion of balanced and healthy dietary patterns. It is important for all population groups to be able to opt for a healthy and balanced diet. In this context, this means in particular that they must have a dietary pattern that contains neither too much nor too little protein. Animal and/or plant proteins have their place in such a pattern. Special attention is needed to ensure that vulnerable segments of the population opt for protein products to a sufficient degree.
- Stimulate positive appreciation for the group of consumers who want to reduce the consumption of food products of animal origin in their overall diet.
- A more coherent policy on consumer information about sustainable protein products (sustainably produced dairy products and meat, plant alternatives for food products of animal origin, meal concepts with less or no meat). This comprises in particular making the population aware of the impact of their food choices.

2.5. Organisation of the protein transition

[17] The Council proposes that, with a broader view to the transition to a sustainable food system, the federal government take the initiative to set up a national, cross-policy platform where the protein transition process is set in motion and stimulated further.

[18] The Council proposes that this platform work out further the protein transition concept in line with its recommendations and in consideration of the role of all stakeholders.

[19] It is important for the transition platform to chart the framework, objectives and strategies of a far-reaching protein transition by 2050 which can provide an answer to the major societal challenges relating to the current protein production and consumption.

[20] The Council advocates the charting of a ten-year plan for a sustainable food system, one that integrates the results of the activities and agreements on the protein transition.

[21] A comprehensive scientific research programme launched in the short term must take better stock of the existing knowledge on all facets of the protein transition and new, targeted research must be initiated on the missing elements of that knowledge. In addition, concrete actions or projects that are in line with the charted future strategies can already be started.

[22] The Council asks to be further involved in charting the protein transition.

Annex 1

RTRS standard 1.0 (see http://www.responsiblesoy.org)

Principle 1: Legal Compliance and Good Business Practice

1.1 There is awareness of, and compliance with, all applicable local and national legislation.

Note: For group certification of small farms - group managers should provide training for group members on applicable laws and legal compliance.

1.1.1 Awareness of responsibilities, according to applicable laws can be demonstrated.

1.1.2 Applicable laws are being complied with.

1.2 Legal use rights to the land are clearly defined and demonstrable.

Note: Land use rights of traditional land users are considered in Criterion 3.2 which should be cross-referenced with this criterion.

1.2.1 There is documented evidence of rights to use the land (e.g. ownership document, rental agreement, court order etc.).

1.3 There is continual improvement with respect to the requirements of this standard.

Note: For group certification - continual improvement should be recorded and monitored at the group level.

1.3.1 A review process is carried out which identifies those social, environmental and agricultural aspects of the operation (on and off farm) where improvement is desirable.

Note: The producer is expected to be aware of the social and environmental context in which he/she is operating and the existing and possible future impacts of the operation.

1.3.2 A number of indicators are selected and a baseline is established to be able to monitor continual improvement on those aspects where desired improvements have been identified.

Note: Producers are free to choose the continual improvement indicators that are relevant to them to demonstrate continual improvement with respect to the requirements of this standard; e.g. Soil carbon content, use of agrochemicals, state of riparian vegetation etc. The baseline year is the year of first certification assessment.

1.3.3 The results of monitoring are reviewed and appropriate action is planned and taken when necessary to ensure continual improvement.

Principle 2: Responsible Labor Conditions

Note 1: The requirements of Principle 2 apply to both direct employees and to workers supplied by third parties.
Note 2: The principle applies also to migrant, seasonal and other contract labor.

2.1 Child labor, forced labor, discrimination and harassment are not engaged in or supported.

2.1 1 No forced, compulsory, bonded, trafficked or otherwise involuntary labor is used at any stage of production.

2.1.2 No workers of any type are required to lodge their identity papers with anyone and no part of their salary, benefits or property is retained, by the owner or any 3rd party, unless permitted by law.

2.1.3 Spouses and children of contracted workers are not obliged to work on the farm.

2.1.4 Children and minors (below 18) do not conduct hazardous work or any work that jeopardizes their physical, mental or moral well being.

2.1.5 Children under 15 (or higher age as established in national law) do not carry out productive work. They may accompany their family to the field as long as they are not exposed to hazardous, unsafe or unhealthy situations and it does not interfere with their schooling

2.1.6 There is no engagement in, support for, or tolerance of any form of discrimination.

2.1.7 All workers receive equal remuneration for work of equal value, equal access to training and benefits and equal opportunities for promotion and for filling all available positions.

2.1.8 Workers are not subject to corporal punishment, mental or physical oppression or coercion, verbal or physical abuse, sexual harassment or any other kind of intimidation.

2.2 Workers, directly and indirectly employed on the farm, and sharecroppers, are adequately informed and trained for their tasks and are aware of their rights and duties.

2.2.1 Workers (including temporary workers), sharecroppers, contractors and subcontractors have a written contract, in a language that they can understand.

Note: The requirements of indicator 2.2.1 are recommended in all cases. However, for small farms where there are high illiteracy rates group managers may implement alternative mechanisms to make collectively known and verify valid working relationships.

2.2.2 Labor laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) are available in the languages understood by the workers or explained carefully to them by a manager or supervisor.

2.2.3 Adequate and appropriate training and comprehensible instructions on fundamental rights at work, health and safety and any necessary guidance or supervision are provided to all workers.

2.3 A safe and healthy workplace is provided for all workers.

2.3.1 Producers and their employees demonstrate an awareness and understanding of health and safety matters.

2.3.2 Relevant health and safety risks are identified, procedures are developed to address these risks by employers, and these are monitored.

2.3.3 Potentially hazardous tasks are only carried out by capable and competent people who do not face specific health risks.

2.3.4 Adequate and appropriate protective equipment and clothing is provided and used in all potentially hazardous operations such as pesticide handling and application and mechanized or manual operations.

2.3.5 There is a system of warnings followed by legally-permitted sanctions for workers that do not apply safety requirements.
2.3 6 Accident and emergency procedures exist and instructions are clearly understood by all workers.
2.3.7 In case of accidents or illness, access to first aid and medical assistance is provided without delay.
2.4 There is freedom of association and the right to collective bargaining for all workers.
2.4.1 There is the right for all workers and sharecroppers to establish and/or join an organization of their choice.
2.4.2 The effective functioning of such organizations is not impeded. Representatives are not subject to discrimination and have access to their members in the workplace on request.
2.4.3 All workers have the right to perform collective bargaining.
2.4.4 Workers are not hindered from interacting with external parties outside working hours (e.g. NGOs, trade unions, labor inspectors, agricultural extension workers, certification bodies).
2.5 Remuneration at least equal to national legislation and sector agreements is received by all workers directly or indirectly employed on the farm.
2.5.1 Gross wages that comply with national legislation and sector agreements are paid at least monthly to workers.
2.5.2 Deductions from wages for disciplinary purposes are not made, unless legally permitted. Wages and benefits are detailed and clear to workers, and workers are paid in a manner convenient to them. Wages paid are recorded by the employer.
2.5.3 Normal weekly working hours do not exceed 48 hours. Weekly overtime hours do not exceed 12 hours.
2.5.4 If additional overtime hours are necessary the following conditions are met:
a) It only occurs for limited periods of time (eg. peak harvest, planting).
b) Where there is a trade union or representative organization the overtime conditions are negotiated and agreed with that organization.
c) Where there is no trade union or representative organization agreement the average working hours in the two-month period after the start of the exceptional period still do not exceed 60 hours per week.
2.5.5 Working hours per worker are recorded by the employer.
2.5.6 Overtime work at all times is voluntary and paid according to legal or sector standards. In case overtime work is needed, workers receive timely notification. Workers are entitled to at least one day off following every six consecutive days of work.
2.5.7 Salaried workers have all entitlements and protection in national law and practice with respect to maternity. Workers taking maternity leave are entitled to return to their employment on the same terms and conditions that applied to them prior to taking leave and they are not subject to any discrimination, loss of seniority or deductions of wages.
2.5.8 If workers are paid per result, a normal 8 hour working day allows workers, (men and women), to earn at least the national or sector established minimum wage.
2.5.9 If employees live on the farm, they have access to affordable and adequate housing, food and potable water. If charges are made for these, such charges are in accordance with market conditions. The living quarters are safe and have at least basic sanitation.

Principle 3: Responsible Community Relations
3.1 Channels are available for communication and dialogue with the local community on topics related to the activities of the soy farming operation and its impacts.
3.1.1 Documented evidence of communication channels and dialogue is available.
3.1.2 The channels adequately enable communication between the producer and the community.
3.1.3 The communication channels have been made known to the local communities.
3.2 In areas with traditional land users, conflicting land uses are avoided or resolved.
3.2.1 In the case of disputed use rights, a comprehensive, participatory and documented community rights assessment is carried out.
3.2.2 Where rights have been relinquished by traditional land users there is documented evidence that the affected communities are compensated subject to their free, prior, informed and documented consent.
3.3 A mechanism for resolving complaints and grievances is implemented and available to local communities and traditional land users.
Note: For group certification - the complaints and grievances mechanism can be managed by the group manager and records of complaints and grievances can be maintained at the group level.
3.3.1 The complaints and grievances mechanism has been made known and is accessible to the communities.
3.3.2 Documented evidence of complaints and grievances received is maintained.
3.3.3 Any complaints and grievances received are dealt with in a timely manner.
3.4 Fair opportunities for employment and provision of goods and services are given to the local population.
3.4.1 Employment opportunities are made known locally.
Note: Not applicable for small farms.
3.4.2 There is collaboration with training programs for the local population.
Note: Small farms may participate in training programs where they exist. For groups the collaboration with training programs may occur at the group level.
3.4.3 Opportunities for supply of goods and services are offered to the local population.
Note: Not applicable for small farms.

Principle 4: Environmental Responsibility
4.1 On and off site social and environmental impacts of large or high risk new infrastructure have been assessed and appropriate measures taken to minimize and mitigate any negative impacts.
Note: For group certification – this also applies to large new infrastructure projects developed by the entity holding the group certificate, where the infrastructure is used by certified group members or the certified soy they produce.

4.1.1 A social and environmental assessment is carried out prior to the establishment of large or high risk new infrastructure.
4.1.2 The assessment is carried out by someone who is adequately trained and experienced for this task.
4.1.3 The assessment is carried out in a comprehensive and transparent manner.
4.1.4 Measures to minimize or mitigate the impacts identified by the assessment are documented and are being implemented.
4.2 Pollution is minimized and production waste is managed responsibly.

Note: Chemical use and disposal is dealt with under Principle 5.

4.2.1 There is no burning on any part of the property of crop residues, waste, or as part of vegetation clearance, except under one of the following conditions:
a) Where there is a legal obligation to burn as a sanitary measure;
b) Where it is used for generation of energy including charcoal production and for drying crops;
c) Where only small-caliber residual vegetation from land clearing remains after all useable material has been removed for other uses.
4.2.2 There is adequate storage and disposal of fuel, batteries, tires, lubricants, sewage and other waste.
4.2.3 There are facilities to prevent spills of oil and other pollutants.
4.2.4 Re-use and recycling are utilized wherever possible.
4.2.5 There is a residue management plan including all areas of the property.
4.3 Efforts are made to reduce emissions and increase sequestration of Greenhouse Gases (GHGs) on the farm.

Note: Other issues which are relevant to GHG emissions are covered in other principles including: Use of fertilizers (Criterion 5.5), Land-use change (Criterion 4.4).

4.3.1 Total direct fossil fuel use over time is recorded, and its volume per hectare and per unit of product for all activities related to soy production is monitored.
4.3.2 If there is an increase in the intensity of fossil fuel used, there is a justification for this. If no justification is available there is an action plan to reduce use.
4.3.3 Soil organic matter is monitored to quantify change in soil carbon and steps are taken to mitigate negative trends.

Note: For group certification of small farms - the monitoring of soil carbon can be done using samples.

4.3.4 Opportunities for increasing carbon sequestration through restoration of native vegetation, forest plantations and other means are identified.
4.4 Expansion of soy cultivation is responsible.

Note: This criterion will be revised after June 2012 if RTRS-approved maps and system are not available.

4.4.1 After May 2009 expansion for soy cultivation has not taken place on land cleared of native habitat except under the following conditions:
4.4.1.1 It is in line with an RTRS-approved map and system (see Annex 4.)
or
4.4.1.2 Where no RTRS-approved map and system is available:
a) Any area already cleared for agriculture or pasture before May 2009 and used for agriculture or pasture within the past 12 years can be used for soy expansion, unless regenerated vegetation has reached the definition of native forest (see glossary).
b) There is no expansion in native forests (see glossary)
c) In areas that are not native forest (see glossary), expansion into native habitat only occurs according to one of the following two options:
Option 1. Official land-use maps such as ecological-economic zoning are used and expansion only occurs in areas designated for expansion by the zoning. If there are no official land use maps then maps produced by the government under the Convention on Biological Diversity (CBD) are used, and expansion only occurs outside priority areas for conservation shown on these maps.
Option 2. An High Conservation Value Area (HCVA) assessment is undertaken prior to clearing and there is no conversion of High Conservation Value Areas.

Note: Where neither official land use maps nor CBD maps exist, Option 2 must be followed.

4.4.2 There is no conversion of land where there is an unresolved land use claim by traditional land users under litigation, without the agreement of both parties.
4.5 On-farm biodiversity is maintained and safeguarded through the preservation of native vegetation.
4.5.1 There is a map of the farm which shows the native vegetation.
4.5.2 There is a plan, which is being implemented, to ensure that the native vegetation is being maintained (except areas covered under Criterion 4.4)
4.5.3 No hunting of rare, threatened or endangered species takes place on the property.

Principle 5: Good Agricultural Practice

5.1 The quality and supply of surface and ground water is maintained or improved.
5.1.1 Good agricultural practices are implemented to minimize diffuse and localized impacts on surface and ground water quality from chemical residues, fertilizers, erosion or other sources and to promote aquifer recharge.
5.1.2 There is monitoring, appropriate to scale, to demonstrate that the practices are effective.
5.1.3 Any direct evidence of localized contamination of ground or surface water is reported to, and monitored in collaboration with local authorities.
5.1.4 Where irrigation is used, there is a documented procedure in place for applying best practices and acting according to legislation and best practice guidance (where this exists), and for measurement of water utilization.

Note: For group certification of small farms - Where irrigation is used for crops other than soy but is not done according to best practice, a plan is in place and is being implemented to improve practices. The group manager is responsible for documentation.

5.2 Natural vegetation areas around springs and along natural watercourses are maintained or re-established.

5.2.1 The location of all watercourses has been identified and mapped, including the status of the riparian vegetation.
5.2.2 Where natural vegetation in riparian areas has been removed there is a plan with a timetable for restoration which is being implemented.
5.2.3 Natural wetlands are not drained and native vegetation is maintained.
5.3 Soil quality is maintained or improved and erosion is avoided by good management practices.
5.3.1 Knowledge of techniques to maintain soil quality (physical, chemical and biological) is demonstrated and these techniques are implemented.
5.3.2 Knowledge of techniques to control soil erosion is demonstrated and these techniques are implemented.
5.3.3 Appropriate monitoring, including soil organic matter content, is in place.

Note: For group certification - Monitoring of soil fertility and soil quality should be part of the internal control system and can be carried out on a sampling basis within the group.

5.4 Negative environmental and health impacts of phytosanitary products are reduced by implementation of systematic, recognized Integrated Crop Management (ICM) techniques.

Note: See Annex 5 for further information on ICM.

5.4.1 A plan for ICM is documented and implemented which addresses the use of prevention, and biological and other non-chemical or selective chemical controls.

Note: For group certification of small farms - (particularly those who are not literate) the development and documentation of the ICM plan should be undertaken by the group manager, together with support for implementation.

5.4.2 There is an implemented plan that contains targets for reduction of potentially harmful phytosanitary products over time.
5.4.3 Use of phytosanitary products follows legal requirements and professional recommendations (or, if professional recommendations are not available, manufacturer's recommendations) and includes rotation of active ingredients to prevent resistance.
5.4.4 Records of monitoring of pests, diseases, weeds and natural predators are maintained.
5.5 All application of agrochemicals is documented and all handling, storage, collection and disposal of chemical waste and empty containers, is monitored to ensure compliance with good practice.
5.5.1 There are records of the use of agrochemicals, including:
a) products purchased and applied, quantity and dates;
b) identification of the area where the application was made;
c) names of the persons that carried out the preparation of the products and field application;
d) identification of the application equipment used;
e) weather conditions during application.
5.5.2 Containers are properly stored, washed and disposed of; waste and residual agrochemicals are disposed in an environmentally appropriate way.
5.5.3 Transportation and storage of agrochemicals is safe and all applicable health, environmental and safety precautions are implemented.
5.5.4 The necessary precautions are taken to avoid people entering into recently sprayed areas.
5.5.5 Fertilizers are used in accordance with professional recommendations (provided by manufacturers where other professional recommendations are not available).
5.6 Agrochemicals listed in the Stockholm and Rotterdam Conventions are not used.

Note: During the next 3 years, the RTRS will review the use of other chemicals, particularly the following 3 chemicals: Endosulfan (WHO Class II), Paraquat (Class II), Carbofuran (Class Ib)

5.6 1 There is no use of agrochemicals listed in the Stockholm and Rotterdam Conventions.
5.7 The use of biological control agents is documented, monitored and controlled in accordance with national laws and internationally accepted scientific protocols.
5.7.1 There is information about requirements for use of biological control agents.
5.7.2 Records are kept of all use of biological control agents that demonstrate compliance with national laws.
5.8 Systematic measures are planned and implemented to monitor, control and minimize the spread of invasive introduced species and new pests.
5.8.1 Where there are institutional systems in place to identify and monitor invasive introduced species and new pests, or major outbreaks of existing pests, producers follow the requirements of these systems, to minimize their spread.
5.8.2 Where such systems do not exist, incidences of new pests or invasive species and major outbreaks of existing pests are communicated to the proper authorities and relevant producer organizations or research organizations.

Note: For group certification - the group manager is responsible for communicating to the authorities and relevant organizations.

5.9 Appropriate measures are implemented to prevent the drift of agrochemicals to neighboring areas.
5.9.1 There are documented procedures in place that specify good agricultural practices, including minimization of drift, in applying agrochemicals and these procedures are being implemented.
5.9.2 Records of weather conditions (wind speed and direction, temperature and relative humidity) during spraying operations are maintained.
5.9.3 Aerial application of pesticides is carried out in such a way that it does not have an impact on populated areas. All aerial application is preceded by advance notification to residents within 500m of the planned application.

Note: 'Populated areas' means any occupied house, office or other building.

5.9.4 There is no aerial application of pesticides in WHO Class Ia, Ib and II within 500m of populated areas or water bodies.
5.9.5 There is no application of pesticides within 30m of any populated areas or water bodies.

Note: 'Water bodies' includes, but is not limited to, water courses, rivers, streams, lagoons, springs, lakes, reservoirs and ditches.

5.10 Appropriate measures are implemented to allow for coexistence of different production systems.

5.10.1 Measures are taken to prevent interference in production systems of neighboring areas.
5.11 Origin of seeds is controlled to improve production and prevent introduction of new diseases.
5.11.1 All purchased seed must come from known legal quality sources.
5.11.2 Self-propagated seeds may be used, provided appropriate seed production norms are followed and legal requirements regarding intellectual property rights are met.

Annex 2

Open Letter: Growing Opposition to Round Table on Responsible Soy
June 2010

The undersigned organisations reject the "responsible" label for soy developed by the Round Table on Responsible Soy (RTRS). The attempts by the Round Table on Responsible Soy to greenwash large scale genetically modified (GM) soy production by labelling it as "responsible" will aggravate the problems caused by industrial soy production, instead of providing solutions.

The RTRS is expected to launch its "responsible" label after its conference in June 2010 in Brazil. Industrial soy production has caused rampant social and environmental damage in South America, including habitat destruction, deforestation, destruction of local food production systems, degraded soil fertility, exposure of local people to toxic pesticides and the large scale displacement of local communities and small farming systems.

In the North, large scale soy production has facilitated unprecedented industrialisation of the food chain, increasing reliance on imported animal feed and promoting unsustainable animal production with negative consequences for farming, the environment and people's health, and encouraging unsustainable consumption patterns. Intensive meat, dairy and egg production is an important contributor to global greenhouses gas emissions, while agrofuels from soy could produce more emissions than fossil fuels.

Multinational companies reap huge financial rewards from this unsustainable production system at both ends.

The RTRS cannot succeed in its stated aims to deliver "responsible" soy because:

1) RTRS lacks support and is not representative

The RTRS claims to be an "international multi-stakeholder initiative", but in reality the scheme has little or no support from sustainable family farmers, social movements or civil society, either in South America or in Europe. On the contrary the scheme faces strong criticism from these organizations especially in soy producing countries. Furthermore, major players in the Brazilian soy industry - APROSOJA and ABIOVE - have turned their backs on the RTRS due to disagreements on the inclusion of even the very weak deforestation clause (see 2).

2) RTRS criteria are seriously flawed

The RTRS claims to be developing a "responsible" label for mainstream soy, but is based on a wholly inadequate set of principles and criteria. For example:

GMOs and pesticides

> The RTRS will certify genetically modified (GM) soy as responsible. Most soy in South America is genetically modified to be resistant to the herbicide Glyphosate (marketed by Monsanto as RoundupReady soy). Both GM and non-GM soy are based on monocultures, both have destructive impacts on biodiversity and local communities and both use a range of agrochemicals, but herbicide-resistant soy has higher negative biosafety impacts than non-GM soy, particularly for soil life and fertility. While GM soy is promoted to farmers as a way to reduce labour costs, the continuous and indiscriminate application of herbicides resulting from the use of herbicide-resistant crops has severe impacts on the livelihoods and health of communities living around the soy fields. It has also accelerated the emergence of herbicide resistant weeds, which are a serious problem across thousands of hectares of soy in the US, Argentina and Brazil. This is also forcing a return to using more dangerous pesticides such as 2,4-D (a component of Agent Orange).

Deforestation and soy expansion

> The RTRS criteria for "responsible" soy agreed in May 2009 do not prevent further deforestation. According to the RTRS, "responsible" soy can be grown on land that has been deforested as recently as May 2009. "Responsible" soy can even be grown on land that will be deforested in the future, as long as the producer can provide "scientific evidence" that there were no primary forest, or High Conservation Value Areas (HCVAs), on that land and that it did not affect "local peoples' land" (which is not further defined).

It is not clear how these flawed criteria will be monitored and enforced.

3) RTRS cannot address macro-level impacts of industrial farming

Importantly, the RTRS cannot address the deforestation, greenhouse gas emissions and social conflicts caused by displacing agricultural activities elsewhere (Indirect Land Use Change). Other impacts include rising food prices and huge pressures on land and resources.

4) RTRS claims climate benefits

RTRS "responsible" soy claims to have climate benefits, but would largely supply feed for unsustainable intensive poultry, livestock and agrofuel production. The perverse lobbying at the 2009 UN Climate Change Conference in Copenhagen of the RTRS along with biotech giant Monsanto to gain carbon credits for industrial soy production gained them the international Angry Mermaid Award for worst climate lobbying. In the EU, the RTRS is trying to gain accreditation under the EU Renewable Energy Directive (RED) that contains the widely opposed 10% agrofuel target.

Some of the pilot projects of the RTRS involve small scale farming of soy, but this cannot mask the fact that the bulk of the RTRS's "responsible" soy will be grown on large-scale plantations with heavy pesticide use and no consideration for the local people or the environment. Consumers are currently prevented from seeing the extent of the damage done by industrial (RoundupReady) soy as it happens far from their homes. European supermarkets use the RTRS to claim they are acting responsibly while carrying on with business as usual. Any supermarket that participates in the RTRS risks a backlash from its customers.

To address the impacts outlined above the undersigned organisations demand real solutions that move to a sustainable food production system that include:

- phasing out monoculture production systems and instead promoting agro-ecological systems, diversification of production and stimulation of local production for local markets that contribute to food security and food sovereignty in producer and consumer countries.
- promoting genuine land reforms and land rights in producing countries, which will address highly inequitable land ownership and concentration;
- drastically changing production models and consumption patterns required to feed a population of 9 billion in 2050 sustainably and equitably; this means reducing the shocking levels of overconsumption and waste in the industrialised world
- abandoning intensive meat, dairy and egg production systems and moving towards low-input livestock systems
- eliminating Europe's dependency on plant protein imports and support a move towards more low input, grass based livestock systems.
- stopping the promotion of agrofuel production as a climate solution for rich countries and instead developing better transport systems that reduce demand for energy and fuel.

Signatories:

(additional signatories since letters were sent to RTRS):

Amis de la Terre, France
Asamblea de vecinos autoconvocados de Ciudad Evita (AVACE), Argentina
ATTAC - ARGENTINA
BIZILUR-Asociación para la cooperación y el desarrollo de los pueblos, Euskal Herria (Basque country)
Campana Sin Maiz no hay Pais, Mexico
Catedra Libre de Soberania Alimentaria - Unversidad de La Plata, Argentina
CDM Watch
Comision Multisectorial de Uruguay
Comissao de Marcha Mundial das Mulheres de Sergipe, Brazil
FDCL - Centro de Investigacion y Documentacion Chile-America Latina, Germany
Federacion de Prosumidores Agroecologicos AGROSOLIDARIA BOYACA, Colombia
GeneWatch, UK
GLOBAL 2000, Friends of the Earth Austria
Grupo de Estudios Ambientales AC
IFOAM, (International Federation of Organic Agriculture Movements)
Marcha Mudial das Mulheres de Caxias do Sul, Brazil
Movimiento de Mujeres Indigenas Tz'ununija/REMETA, Guatemala
Naturland Association for Organic Agriculture, Germany
Philippine Network on Climate Change
Red Latinoamericana de Mujeres Transformando la Economia
Red de Semillas, España
Society for Threatened Peoples International (BfbV - International)
Vecinxs Autoconvocadxs, Cordoba, Argentina

WECF - Women in Europe for a Common Future
Young Green Women, Sierra Leone

(original signatories):

11.11.11, Flemish federation of North-South organisations, Belgium
African Centre for Biosafety, South Africa
AFRICANDO Ongd, Gran Canaria
Afrika-Europa netwerk, Netherlands
Alianza Civica Chiapas, Mexico
All Nepal Peasants' Federation (ANPFa)
AMAP, Alianza Mexicana por la Autodeterminacion de los Pueblos, Mexico
Amazon Watch, United States
Amigos de la Tierra - Argentina
Amigos de la Tierra Espana - Friends of the Earth Spain
APROMAC - Associacao de Protecao ao Meio Ambiente, Brasil
Arbeitsgemeinschaft bauerliche Landwirtschaft, Via Campesina Germany
ASEED Europe
ASK (Arbeitsgruppe Schweiz-Kolumbien / Swiss Working Group on Colombia)
Asociacion ANDES, Alejandro Argumedo, Peru
Asociacion Civil Desarrollo Territorial Monteros, de Monteros -Tucuman, Argentina
Asociacion Civil GLEDUCAR, Argentina
Asociacion de Defensa de la Vida ADEVI, Peru
Asociacion de Solidaridad con Colombia, KATIO, Spain
Asociacion Ecologica Madremonte, Colombia
Asociacion Entrepueblos, Estado Espanol
Asociacion Pachamama Ayacucho, Peru
Association Bio Consom'acteurs, France
Association of Latvian Organic Agriculture, Latvia
Associations 21, Belgium
Attac AgrarNetz, Germany
Attac Espana
Attac Poland
AVES FRANCE, A Voice for Endangered Species
BASE Investigaciones Sociales, Asuncion - Paraguay
Basler Appell gegen Gentechnologie, Switzerland
BI "Kein Strom aus Palmol!", Germany
BioForum Vlaanderen vzw, Belgium
Biofuelwatch, UK
Biowatch South Africa
BUND, Friends of the Earth Germany
Campaign for Real Farming, UK
Campana Semillas de Identidad, Colombia
Canadians for Action on Climate Change
Canadian Biotechnology Action Network, Canada
CAPOMA-DDHH (Centro de Accion Popular Olga Marquez de Aredez en defensa de los Derechos Humanos), Ledesma-Jujuy-Argentina
Carbon Trade Watch
CATAPA, Comite Academico Tecnico de Asesoramiento a Problemas Ambientales, Belgium
Centre for Sustainable Development and Environment (CENESTA), Iran
Centro de Estudios Historicos Arturo Jauretche, Argentina
Centro de studios sobre Tecnologias Apropiadas de Argentina (CETAAR)
CESTA, Friends of the Earth El Salvador
COAG, Espana
COECOCEIBA - Amigos de la Tierra Costa Rica
Colectiu Transgenics Fora!, Catalunya
Combat Monsanto, France
Comite Oscar Romero Madrid, Spain
Comite pour l'Annulation de la Dette du Tiers-Monde, France (CADTM), France
Concerned Citizens against Climate Change (4C), Netherlands
CONAMURI, Coordinadora Nacional de Mujeres Rurales e Indigenas, Paraguay
Conselho Municipal dos Direitos da Mulher de Lins (SP), Brazil
Consumidores por el desarrollo, Peru
Confederation Paysanne, France
Coordinador Nacional Agrario de Colombia (CAN)
Corporate Europe Observatory
Cristianos Sin Fronteras, Peru
Development Fund, Norway
Dialogo Convencion Climatica, Mexico
Don't Waste Arizona, Phoenix, AZ USA

Ecologistas en Accion, Spain
Ecological Society of the Philippines
Econexus
Ecoportal.net, Argentina
Ecos the Saladillo, Argentina
ECOQUILPUE, Region de Valparaiso, Chile
Ecumenical Office for Peace and Justice, Germany
EdPAC -Educacion para la Accion Critica, Espana
ENLACE, Comunicacion y Capacitacion, A.C., Mexico
EQUIVITA, Comitato Scientifico Antivivisezionista, Italy
Eurolatina, Belgique
European Coordination Via Campesina (ECVC)
European GMO-free Citizens, the Netherlands
FASE - Solidarity and Educacao, Brazil
FECBE, Federacion de ecuatorianos en Belgica, Belgium
Federacion Nacional de Trabajadores del Agua Potable del Peru - FENTAP
Federation Inter-Environnement Wallonie, Belgium
Federation of Organic Food Enterprices / Bund Okologische Lebensmittelwirtschaft (BOLW), Germany
Federation Unie de Groupements d'eleveurs et d'agriculteurs (FUGEA), Via Campesina Belgique
FERN
FOCO (Foro Ciudadano de Participacion por la Justicia y los Derechos Humanos), Argentina
Focus on the Global South
Fondazione Diritti Genetici, Italy
Food and Water Europe (FWE)
Food First/Institute for Food and Development Policy, USA
Forum Carajas, Brazil
FIAN Germany
FIAN Netherlands
Friends of the Earth Cyprus
Friends of the Earth Vlaanderen, Belgium
Friends of the Earth Brussels, Belgium
Friends of the Earth International
Fundacja Pomaranczowa Alternatywa/ Orange Alternative Foundation, Poland
GAIA, Portugal
Gene Ethics, Australia
Gen-ethisches Netzwerk/ Gen-ethical Network, Germany
Global Forest Coalition
Guatemala Solidaritat Osterreich (Solidarity with Guatemala of Austria)
GM Free Australia
GM Free Cymru, Wales
GM-free Ireland Network
GM Freeze, UK
GM Watch, UK
Green Health Watch Magazine, UK
Grupo de Investigacion en Derechos Humanos y Sostenibilidad, Catedra UNESCO - UPC, Cataluna
Grupo de Mujeres de San Cristobal de las Casas, A.C, Chiapas, Mexico
Grupo de Reflexion Rural, Argentina
Grupo Semillas, Colombia
Grupo Thunhupha, Bolivia
Hegoa Instituto de Estudios sobre Desarrollo y Cooperacion Internacional, Pais Vasco
Ibase - Brazilian Institute of Economic and Social Analyses
ICEPH - Instituto Cordillerano de Estudios y Promocion Humana, Rio Negro, Argentina
ICPPC - International Coalition to Protect the Polish Countryside, Poland
Informationsgruppe Lateinamerika (IGLA), Vienna, Austria
India FDI Watch
Iniciativa contra los Agronegocios - America Latina, Nicaragua, El Salvador
Iniciativa Radial, Argentina
Initiative Colibri, Germany
Institute for Responsible Technology, Fairfield, USA
Institute for Sustainable Development, Ethiopia
Institute of Science in Society, Dr. Mae-Wan Ho, UK
Interessengemeinschaft fur gentechnikfreie Saatgutarbeit (Germany, Austria, Switzerland)
JKPP (Jaringan Kerja Pemetaan Partisipatif / Community Mapping Network), West Java, Indonesia
Kenya Debt Relief Network (KENDREN)
Knoll Farms, California, USA
Kooperation Brasilien, Germany
Labour, Health and Human Rights Development Centre, Nigeria
Loophole Community Centre, Melbourne, Australia
MADGE Australia Inc
Madras del Pueblo del Sureste, AC, Chiapas, Mexico

Mandala Gardening Initiative, Ottawa, Canada
Mangrove Action Project, USA
Marcha Mundial de las Mujeres, Brasil
Marea Creciente Mexico
Maryknoll Office for Global Concerns, USA
MASIPAG (Farmer-Scientist Partnership for Development), Philippines
MAIZ (Movimiento Agrario Indigena Zapatista), Mexico
Mesa Amplia por el cierre definitivo del incinerador de residuos toxicos, Argentina
Movimiento Campesino Paraguayo (MCP), Via Campesina Paraguay
Movimiento Mundial por los Bosques Tropicales/ World Rainforest Movement
Mouvement d'Action Paysanne (MAP), Florenville, France
MPI - Movimento Pro-Informacao para a Cidadania e Ambiente, Portugal
Munlochy Vigil, Scotland
National Fisheries Solidarity Movement, Sri Lanka
National Toxics Network - Working globally for a toxic-free future, Australia
Neal's Yard Remedies, UK
New York Climate Action Group, USA
NOAH, Friends of the Earth Denmark
NOUSUD, Cooperacion internacional y desarrollo local, Mallorca, Islas Baleares
OBV-Via Campesina Austria
Oficina de Justicia, Paz e Integridad de la CreaciÃ³n, San Columbano, Chile
Oikos - Organic Norway, movement of organic producers and consumers
Organic Consumers Association, USA
Organizacion Fraternal Negra Hondurena (OFRANEH), Honduras
Osservatorio informativo independente sulla Americhe, Italy
Otros Mundos AC - Amigos de la Tierra Mexico
Our Common Future, UK
Oxfam-Solidariteit/Oxfam-Solidarite, Belgium
Perkumpulan Elang, Riau, Indonesia
Pesticide Action Network North America
PLANT (Partners for the Land & Agricultural Needs of Traditional Peoples), USA
Platform Aarde Boer Consument, Netherlands
Plataforma de Solidaridad con Chiapas de Madrid, Espana
Polska Zielona Siec, (Polish Green Network), Poland
Pro REGENWALD, Germany
Proyecto Cultura y Solidaridad, Espana
QUERCUS - A.N.C.N., Portugal
RAPAL, Red de accion en plaguicidas de America Latina
RAPAL para Meso America y Caribe
Red de Coordinacion en Biodiversidad A.C, Costa Rica
Red Jubileo Sur Mexico
Red Mexicana de Accion frente al Libre Comercio (RMALC)
Red por una America Latina Libre de Transgenicos
Reforest the Earth, UK
RETS -Respuestas a las Empresas Transnacionales, Spain
Rettet den Regenwald, Germany
Robin Wood, Germany
Safe Alternatives for our Forest Environment (SAFE), USA
Save our Seeds, Germany
Scarborough Against Genetic Engineering, England
Service d'Information et de Formation sur l'Amerique latine et les Caraibes (SEDIF), Belgique
Spire (Norwegian Development Funds Youth), Norway
Salva la Selva, Spain
Say No to GMOs, Texas, USA
Secretaria Regional Latinoamericana (Rel-UITA), Uruguay
Seeds Action Network (SAN), Germany
Semillas de Vida, Mexico
SOBREVIVENCIA, Amigos de la Tierra Paraguay
Soil Association, UK
Solidarity Sweden-Latin America (Latinamerikagrupperna), Sweden
SOS FAIM Belgique
South Australia Genetic Food Information Network (SAGFIN), Australia
Soy Alliance, UK
Sunray Harvesters, India
Taller Ecologista, Argentina
Tierra del Sol, Organisation des immigrants equatoriens en Belgique
Timberwatch Coalition, South Africa
The Grail, KwaZulu Natal South Africa
Toxicsoy.org
Toxisphera, Associacao de Saude Ambiental, Brazil

Transnational Institute (TNI)
UCIZONI, Union de Comunidades Indigenas de la Zona Norte del Istmo, Mexico
Union paysanne, Quebec (Canada)
Uniterre, Via Campesina Switzerland
Urban Permaculture Co-Operative, Melbourne, Australia
Vereniging voor Ecologisch Leven en Tuinieren, Velt, Belgium
Voedselteams vzw, Belgium
Voor de Verandering, Netherlands
Vredeseilanden, Belgium
War on Want, UK
Washington Biotechnology Action Council, USA
Wervel, Belgium
Wholesome Food Association Limited, UK
World Family, UK
Xarxa de Consum Solidario, Barcelona, Espana
Xarxa de l'Observatori del Deute en la Globalitzacio (ODG-Debtwatch), Catalonia, Spain
X minus Y Solidarity Fund, the Netherlands