

Consulted by Malea Birke, independent evaluator


Benchmarking study on sustainability standards in the soy market

Project report

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Author:

Malea Birke

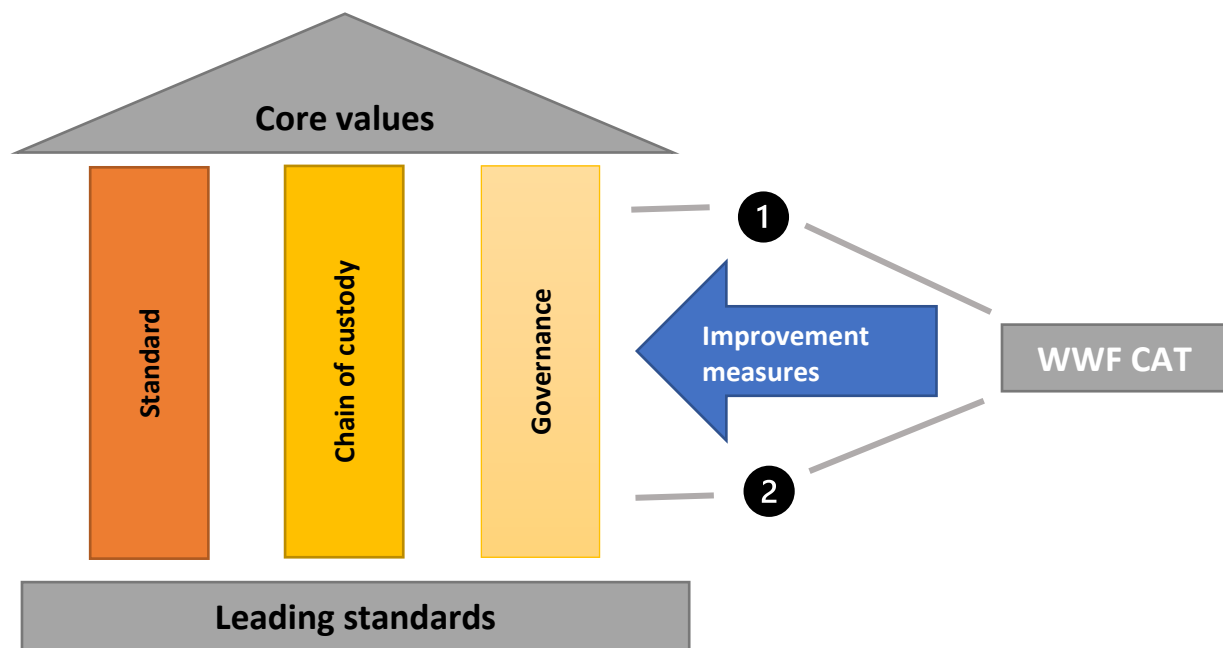
Address:

Römerweg 72, 10318 Berlin, Germany
+49(0) 151 7082 3130
info@maleabirke.com
www.maleabirke.com

Summary

In 2017, the Soy Network produced a benchmark for soy standards and extrapolated a number of improvement measures for the standard organizations. The Soy Network aims to use a second benchmark to evaluate the way the standards are developing and to compare them against European legislation. To guarantee comparability, the 2020 benchmark was carried out again using the Comparison Assessment Tool (CAT) methodology developed by the WWF. CAT uses 80 different criteria relating to content and governance to assess each standard. A color coded system measures the degree to which the criteria have been fulfilled: red to 33% (unsatisfactory), yellow to 66% (satisfactory), green for above 66% (good). The current benchmark has been produced by an independent evaluator Malea Birke.

Soy Network Switzerland defined the basic principles relating to the responsible cultivation and sourcing of soy feed in its [core values](#). The Soy Network has defined leading standards, which all imports of soy feed comply with. The leading standards are supposed to meet these requirements. Six leading standards are currently accepted by the Soy Network: Bio Suisse, Donau Soja, Europa Soja, ISCC PLUS, ProTerra and RTRS. The current benchmark makes two comparisons: (1) It compares the leading standards with each other and against the [2017 benchmark](#) and it assesses how far the [suggestions for improvement](#), which were highlighted by the Soy Network in 2017, have been implemented. (2) It compares the leading standards against European legislation. The author carries out an assessment based on the comparisons, which determines the degree to which the leading standards adhere to the core values of the Soy Network. In addition, she suggests specific improvement measures to help the leading standards to develop further.



 **All leading standards of the Soy Network have developed further between 2017 and 2020.**

1 In terms of governance (management level), all leading standards are rated as good (green). They are rated in the following order: RTRS (85%), ISCC PLUS (75%), ProTerra (73%), Bio Suisse (69%), Donau Soja (67%). In terms of the standard level, only ISCC PLUS (68%) is rated as good,

followed by ProTerra (66%), Bio Suisse (60%), RTRS (57%), Donau Soja (44%) and then the EU Organic Food Regulation (44%). It is important to note that the assessment of ISCC PLUS and ProTerra was carried out using all the definable criteria. Of the definable criteria, 60% were required to certify ISCC PLUS and 80% for ProTerra. This means that both standards do not score as high in practice.

Comparison of the 2017-2020 standards with the 160 criteria used in the CAT methodology

	RTRS NON GMO		ProTerra		ISCC PLUS NON GMO		Donau Soja/Europa Soja		Bio Suisse	
	2017	2020	2017	2020	2017	2020	2017	2020	2017	2020
Governance (Management)	79%	85%	50%	73%	65%	75%	73%	87%	49%	89%
Standard (Content)	56%	57%	70%	66%	65%	88%	45%	44%	54%	60%
	no revision		standard revision		no revision		standard revision		standard revision	

Generally speaking, leading standards, which have had the standard criteria revised since 2017, have made major progress. It is important to note that some of the standard criteria were corrected for ProTerra and Donau Soja in the 2017 assessment. Both these standards were judged overoptimistically in the implementation of some of the criteria. This is why the table shows a decline against 2017.

Good agricultural practice and soil conservation apply to ProTerra. Implementation is not as successful as expected in 2017. Practice is non-binding. This has also not improved through the standard audit. The land use ban applies to Donau Soja. A description of the implementation is missing. Risk management was also corrected in the 2017 assessment. Apart from the description of the GMO risk, currently no other risk factors have been publicly described. The fact that there is a sanctions catalog was judged positively in 2017. The lack of set time limits for each sanction level was overlooked. The fact that annual farm audits only apply to the Ukraine and Moldova was also overlooked. These areas were rated as partially fulfilled in this benchmark. These areas therefore showed a deterioration, even though other areas showed improvement.



Of the 57 suggestions for improvement provided by the Soy Network for the leading standards RTRS, ProTerra, ISCC PLUS and Donau Soja/Europa Soja effective in 2017, 26 (14 completely and 12 partially) were implemented.

	Governance (Management)			Standard (Content)		
	recommended	implemented	partially implemented	recommended	implemented	partially implemented
RTRS	4	1	0	3	0	0
ProTerra	13	3	3	8	4	0
ISCC PLUS	6	1	4	7	2	1
Donau Soja/Europa Soja	9	2	2	7	1	2



ISCC PLUS, ProTerra, RTRS NON GMO and Donau Soja extend at least beyond the EU framework legislation, including the Ukraine.



The four leading standards RTRS, ProTerra, ISCC PLUS and Donau Soja/Europa Soja were compared with **legislation in Switzerland, France, the Ukraine and the EU framework legislation**. The criteria included in all the standards are more detailed than those included in the national and European statutory requirements. Donau Soja/Europa Soja have fewer specific provisions

and only extend marginally beyond the European legislation. Standards, such as Donau Soja, which are based on European legislation, are faced with the fact that the EU framework legislation within the member states is actually becoming more specific. This means that national legislation is stricter than the EU framework legislation. This is why the CAT assessment of Donau Soja (44%) does not extend beyond the CAT assessment of the national legislation in France (46%) and Switzerland (54%). However, in practical terms, the national legislation makes up for the shortfall in provision included in the Donau Soja/Europa Soja standards. This means that Donau Soja/Europa Soja fall in line with the requirements set by national legislation in each European country in all cases—even in countries outside the EU. For example, Donau Soja would conform with the required level of compliance in France by 46 percent and by 54 percent in Switzerland. Donau Soja/Europa Soja represents the European standard outside the EU. This means that EU framework legislation has to be adhered to even in the Ukraine. The individual types of legislation are dealt with in more detail in appendix VI.

Summary of extent to which criteria have been fulfilled for each legislation and the standards.

National legislation:	Switzerland	France	EU	Ukraine
Level to which the CAT standard criteria have been fulfilled	54%	46%	39%	33%
Leading standard:	ISCC PLUS	ProTerra	RTRS NON GMO	Donau Soja/Europa Soja
Level to which the CAT standard criteria have been fulfilled	68%	66%	57%	44%

Standards generally extend beyond the scope of legislation because they take a more detailed and specialized approach to aspects than legislation normally does. This shows that using private standards helps to drive forward sustainability goals. In the case of the standards under consideration, this especially applies to areas such as resource conservation, agricultural practices, climate protection and nature conservation. It is positive to observe the way national legislation makes good any shortfalls in the standards' specifications and the non-binding nature of European specifications. In every case, issues such as land expropriation, forced evictions and poor working conditions are covered by the legislation. Aspects that are not covered by either national/European legislation or the standards include mandatory soil fertility management, nature conservation on a farm-wide level, and integrated crop protection measures. These areas stood out decisively in the benchmark and constitute a key result. There is potential for improvement across all the standards.

Risks were specifically identified for the Ukraine, which could be covered by the standards as part of the risk analysis. Transparent environmental risk assessments, transparent leasing structures and the legal disposal of crop protection containers stood out in the study.



The leading standards RTRS, ProTerra, ISCC PLUS and Donau Soja/Europa Soja comply with Soy Network standards, such as GMO-free practices, forest land conversion bans, eliminating land ownership conflicts and upholding ILO standards.

In terms of content, there is potential for improvement with the standards in relation to good agricultural practice, reductions in the use of pesticides and greenhouse emissions, and with regard to measures to protect soil and water quality.

The non-binding nature of soil conservation and good agricultural practice had also already come to the fore in 2017 and indicated there was large scope for improvement. There is still very little obligation to comply with the criteria or explanatory guidance is missing. This relates to crop rotation, integrated plant protection and soil fertility improvement. Measures to prohibit the use of hazardous pesticides in accordance with the WHO and the Rotterdam Convention are worthy of improvement. RTRS does

not exclude WHO pesticides. ISCC PLUS allows exceptions for WHO I classified pesticides and those listed under the Rotterdam Convention. In terms of nature conservation, it was evident that habitat structures worthy of protection are not being recorded by external experts. Cartography is therefore being outsourced to farmers. In addition, definitions of habitat structures are not always available and so are not auditable. Definitions are generally missing for Donau Soja and ProTerra, and for all standards relating to landscape elements. Criteria was actually listed concerning High Conservation Values . However, without further interpretations to account for the size and structure of biotopes, the point at which the ban on deterioration takes effect is not clear. In addition, river embankment greening measures are implemented differently. ISCC PLUS covers this using a selectable additional criterion. Donau Soja only stipulates river embankment greening measures for companies that do not operate in the EU. Issues that look towards the future, such as considerations relating to water use in river basin regions are not being implemented by any of the standards.

The guiding standards adhere to many core values on the **governance level**. Organizational structures are disclosed. All leading standards implement strategies that enable them to align with Europe. Any modifications that are required are based on querying the criteria in a simplified way. In this benchmark, ISO 17011:2014 is included for accreditation bodies. This has now become the standard for accreditation bodies. Separating the flow of non-GMO products is in place for all standards.

Improvements could be achieved by ensuring standard audit processes are public and transparent. External feedback is currently not made public. At the moment, an impact analysis has not been developed for any of the leading standards' sustainability goals. Any impact analyses that have been carried out do not include measurement indicators. ISCC PLUS is therefore currently developing measurement indicators for the goals. Audit deadlines and summary audit reports are also not published by any of the standards. The scope of the risk assessment in the audits could also be improved. In Europe, in addition to GMO risks, there are also regional-specific risks concerning land conversion and corruption. Standards address specific aspects but not all aspects. RTRS uses maps to evaluate risks associated with land conversion. ProTerra and Donau Soja evaluated a broad spectrum of GMO risks. Standards can learn from each other in this respect. They can address further aspects, which can be referred to supervisory bodies. RTRS and ProTerra currently do not stipulate that unannounced audits should be carried out by the supervisory bodies. This has been implemented by ISCC PLUS and Donau Soja. The specific recommendations for each leading standard are presented in the table, which references the core values (see next pages).

Standard (Content)

Core value	RTRS	ProTerra	ISCC PLUS	Donau Soja/Europa Soja
1b	Introduce biotope networks as a principle.	Introduce biotope networks as a principle.	<ul style="list-style-type: none"> – Introduce biotope networks as a principle. – Schedule external assessments for risk regions. 	<ul style="list-style-type: none"> – The implementation process for the land conversion ban since 2008 needs to be stipulated: <ol style="list-style-type: none"> a) The recording of habitats is not described. In some countries, farmers are self-certifying and this is then randomly checked. Annual checks only take place in high-risk countries such as the Ukraine. If cartography is not carried out by external agencies, it is unclear how conflicts of interest surrounding land conversion are handled. The supervisory process for the monitoring of land conversion is not stipulated. b) The point at which the general land conversion ban came into effect is not defined. The size of habitats is not defined. Small structures and wetland areas, in particular, are currently not covered by the statutory provisions. Definitions should be provided in an appendix to avoid any room for interpretation. c) The biggest challenge centers on the fact that the standard does not view land conversion in terms of the operation but in terms of the area of land. This raises general questions concerning how the criteria is audited per unit of land and how to avoid the risk being circumvented by exchanging land. Nature conservation should be defined as a criterion for the entire operation.
1c	<ul style="list-style-type: none"> – Make IPM mandatory. – Ensure that a Best Practice Manual is available. – Ban WHO I, II pesticides. Paraquat cannot be used from 2021. There is no phase-out plan, but generally for other WHO I, II pesticides. 	<ul style="list-style-type: none"> – Make IPM mandatory. – Ensure that a Best Practice Manual is available. 	<ul style="list-style-type: none"> – Make IPM mandatory. – Ensure that a Best Practice Manual is available. – Complete ban of WHO I, II pesticides. 	-
1d	<ul style="list-style-type: none"> – Define binding criteria for soil fertility. And ensure that a Best Practice Manual is available. – Develop risk assessment for arid regions and climate change adaptation strategies. 	<ul style="list-style-type: none"> – Define binding criteria for soil fertility. / Ensure a Best Practice Manual is available. – Develop risk assessment for arid regions and climate change adaptation strategies. 	<ul style="list-style-type: none"> – Define binding criteria for soil fertility. / Ensure a Best Practice Manual is available. – Develop risk assessment for arid regions and climate change adaptation strategies. – Requirement to regenerate and regreen river embankments to be made a 	<ul style="list-style-type: none"> – Risk assessment to determine if one-sided crop rotation is an issue for European growing regions. – Develop risk assessment for arid regions and climate change adaptation strategies. – Requirement to regenerate habitats and regreen river embankments for <u>non-EU</u> operations. To also include set deadlines.

			mandatory criterion and to include set deadlines.	
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Governance (Management)

Core value	RTRS	ProTerra	ISCC PLUS	Donau Soja/Europa Soja
2a	-	- <i>(Standard is not a multi-stakeholder standard, no changes foreseeable)</i>	-	It is recommended that the NGOs' decision to not be an active part of the multi-stakeholder group should be regularly renewed to ensure there is consensus surrounding these decisions.
2b	<ul style="list-style-type: none"> - Detailed implementation for the supervisory bodies (complete group certification every five years/guidelines on the quota of unannounced audits/supervisory bodies' risk assessment specified). - Corruption is not yet included as a risk factor. 	<ul style="list-style-type: none"> - Detailed implementation for the supervisory bodies (allow more than one supervisory body/supervisory bodies' risk assessment specified/guidelines on the quota of unannounced audits.) - Corruption is not yet included as a risk factor. 	<ul style="list-style-type: none"> - Detailed implementation for the supervisory bodies (guidelines on the quota of unannounced audits). - Expand risk assessment. 	<ul style="list-style-type: none"> - Detailed implementation for the supervisory bodies (complete group certification every five years/guidelines on the quota of unannounced audits/supervisory bodies' risk assessment specified). - Expand risk assessment.
2c	-	-	-	-
2d	Disclose standard revision process.	-	Disclose process descriptions of the standard audit.	<ul style="list-style-type: none"> - Disclosure of the standard audit process. - Publication of certificates. - Disclosure of the benchmark-processes for ISCC and FEAC. - For the checklist for countries outside the EU, disclosure of the classification of EU laws, in order to check that the specifications are complete.
2e	Implement Evaluation & Monitoring Plan in accordance with ISEAL criteria.	Implement Evaluation & Monitoring Plan in accordance with ISEAL criteria.	<i>Define indicators</i> for the Evaluation & Monitoring Plan.	Implement Evaluation & Monitoring Plan in accordance with ISEAL criteria.
2			Extension of the risk assessment in document 204 or define additional random checks and priorities for integrity audits, in order to evaluate whether cross-compliance is generally being put into practice.	

 Six recommendations from the [BAFU impact study](#) are confirmed for the two leading standards ProTerra and RTRS through this benchmark.

1. Analyse the biotope network using remote sensing and GIS at the certified farms, and develop suggestions to assist with implementation.
2. Join the ISEAL organization (ISEAL Compliance), which firstly guarantees the quality of the impact and general governance, and secondly offers the opportunity to share knowledge with standards from other sectors, and to discuss ways in which ISEAL requirements are implemented.
3. Provide soy buyers with the latest online satellite maps which show the land owned by all certified farms (anonymized).
4. Use pilot projects to try to implement a landscape approach. For example, this will bring together private and public actors. It will also encompass farms and landscape as a whole (e.g. the project in Sorriso). This then appears to make sense, if the farms reach a certain size of several 100 hectares.
5. Provide the producers with a continuously updated online list of crop protection products which are banned in the standards (not just the active substances) in order to guarantee implementation. This should be considered in the next standard revision.
6. Update the list of banned substances to include additional WHO I, II pesticides with the assistance of scientists. This should be considered in the next standard revision.

Excursus ISEAL: The basic concept behind ISEAL (*International Social and Environmental Accreditation and Labelling Alliance*) is to help sustainability standards work more closely together, to learn from each other, to regulate oneself more effectively and to continuously motivate oneself to make improvements. Today, the ISEAL guidelines serve as a reference all around the world for the development and application of credible standards. The organization advocates greater compatibility between the standards and the standardization of the certification criteria. The members commit to a multi-stakeholder approach. This enables producers, distributors, importers and NGOs to work together to develop each standard's policies. These collaborative processes allow sustainable common solutions to be developed. They also strengthen the legitimacy of the standard and trust among the different players within the supply chain.

 To conclude, the author highlights future issues and makes 14 recommendations to the Soy Network

Future issues such as the risk assessment on the treatment of landscapes and the inclusion of climate scenarios in production have not yet been considered by the leading standards. None of the standards have set goals to reduce agricultural CO₂ emissions. Notable examples of innovative approaches: Bio Suisse has implemented an excellent risk management process for water use in arid climate zones. RTRS is working on a project at the landscape level (Landscape Approach) in Brazil.

Standards

- I. Crop protection: Prioritize crop protection (exclusion WHO I, II and a binding integrated crop protection (IPM)) ahead of soil conservation. Discuss agricultural practices specific to soy, and the requirements to maintain distances for pesticide use that extends beyond EU legislation (the rule is 1 m in the EU, 5 m in France and 6 m in Switzerland). Formulations in the standards should become more binding.
- II. Soil conservation: Call for detailed guidelines per standard covering the issue of soil fertility (so far only Donau Soja has a soy-specific Best Practice Manual for production).

- III. Water conservation: Focus on inspecting river basin areas on farms larger than 1,000 hectares. The Soy Network could recommend benchmarks that define the farm size from which the landscape approach is to be tested.
- IV. Future issues: The Soy Network can recommend/develop a methodology or emission reduction targets for CO2 calculations. This would then ensure that the values within each different certification system were comparable.
- V. Land use: Call for a whole farm approach for the land conversion ban (this affects Donau Soja). Call for definitions to be created for areas worthy of protection (size, structure). In addition to the deterioration ban, discuss a revaluation rule, especially for networking existing structures. Protection potentials for each standard are recommended in appendix IV.

Governance

- VI. The Soy Network should be involved in standard revision processes.
- VII. Standard revision processes need to be more transparent in the organizations. External feedback is currently not made public.
- VIII. Call for a regular impact analysis for the standard goals, including more transparent measurement indicators.
- IX. Clarify whether the Soy Network's call for comprehensive audit reports can be replaced with a call for public certificates.
- X. Discuss a risk assessment for region-specific risks, such as corruption and changes in land use. Standards deal with individual aspects. Areas for risk assessment are missing. The Standards can benefit each other: RTRS assesses risks relating to land conversion using maps. ProTerra and Donau Soja have evaluated a broad spectrum of GMO risks.
- XI. Define the importance and focus of the accreditation specifications more closely. Questions have arisen here regarding the standards' focus, such as ISCC PLUS.

Country-specific recommendations for the standard organizations:

- XII. Adaptations to the European standard should focus more in terms of content on the socio-economic and climate-related conditions in Europe. Currently, either the entire standard or parts of it are queried on a risk basis. The contents are not adjusted to account for climate issues, legislation and social circumstances.
- XIII. Pressure could be applied to introduce random checks for areas which are considered to be covered by EU legislation. Results can be incorporated into the risk assessment in order to ensure that the risk assessments are kept up to date.
- XIV. The Ukraine risk assessment should be updated to cover GMO, environmental impact assessments, transparent leasing structures and the legal disposal of crop protection containers.