

Sustainability Framework							
P	C	I	Principle	Conformance Criteria	Conformance Indicators V0.1	Category	
						Stakeholder feedback	
1			Principle 1: Management and business practices are legal and responsible				<p>•Principle-level: Aligned with AFI Core Principle 3.4 regarding compliance with applicable law, and the criteria and indicators provide more detail than AFI on the specific expectations for legality. One key provision in AFI that is not included in this Principle: Core Principle 3.4.1: "where there are discrepancies between voluntary commitments [...] and applicable law [...], the highest standard is the reference point..." .</p> <p>•Principle-level: Depending on how 'legal' and 'core' categories and requirements end up being addressed, and if they remain the same as in the current draft, we recommend to consider modifying the title since legality is included throughout this standard and not just in this principle. The distinction between this principle and the legal requirements in the other principles should be made clearer. Similarly, this principle is stated to be focused on 'responsible management and business practices', yet Principles 2, 3, and 4 all include elements of responsible management and business practices</p> <p>No displacement for indigenous people and local community.</p> <p>Suggestion that there should be a specific requirement around land tenancy - for farmers using land which is 'rented', our experience is that they need to be worked with more collaboratively and incentivised in order to protect it from a sustainability point of view. There was also some feedback received that the section on paying taxes, fees and having 'adequate' financial disclosures seemed a bit weak and non-substantiated - possibly some of this detail would come in as you tailor it to an organisation? More robust metrics and consistent reporting frameworks are needed overall it was felt.</p>
1	1	1		1. Land tenure and management rights are secure. Land tenure and the right to operate shall be clearly established according to legal processes.	Land tenure rights shall be secure and obtained through legally established processes.	L	
1	1	2	Principle 1: Management and business practices are legal and responsible	1. Land tenure and management rights are secure. Land tenure and the right to operate shall be clearly established according to legal processes.	Licenses and management rights, shall be in place and issued: a) according to the legally prescribed procedure; b) in absence of conflict with third parties rights; c) specifying the legally-gazetted boundaries; d) and in the absence of corrupt practices.	L	add new indicator regarding " Documents related to the history of land tenure and the actual legal or customary use of the land are available." * This indicator adopted from indicator 4.4.1 RSPO P&C 2018 for reference for land right legality document in several countries, there is a journal in: <a href="https://www.sciencedirect.com/science/article/pii/S0264837719315224?via%3Dihub">https://www.sciencedirect.com/science/article/pii/S0264837719315224?via%3Dihub</a> Community land formalization and company land acquisition procedures: A review of 33 procedures in 15 countries
1	1	3	Principle 1: Management and business practices are legal and responsible	1. Land tenure and management rights are secure. Land tenure and the right to operate shall be clearly established according to legal processes.	Legally required rights to operate shall be in place and obtained through legally established processes.	L	
1	2	1	Principle 1: Management and business practices are legal and responsible	2. Planning and operations meet legal requirements. The planning and operations shall meet legal requirements.	Legal requirements related to disclosure of information shall be complied with.	L	
1	2	2	Principle 1: Management and business practices are legal and responsible	2. Planning and operations meet legal requirements. The planning and operations shall meet legal requirements.	Legal requirements for farm or forest planning shall be complied with.	L	
1	2	3	Principle 1: Management and business practices are legal and responsible	2. Planning and operations meet legal requirements. The planning and operations shall meet legal requirements.	Legal requirements for land clearance or land-use changes shall be complied with.	L	
1	2	4	Principle 1: Management and business practices are legal and responsible	2. Planning and operations meet legal requirements. The planning and operations shall meet legal requirements.	Legal requirements related to operation or harvesting permits shall be complied with.	L	
1	2	5	Principle 1: Management and business practices are legal and responsible	2. Planning and operations meet legal requirements. The planning and operations shall meet legal requirements.	Legal requirements for land preparation and management shall be complied with.	L	
1	2	6	Principle 1: Management and business practices are legal and responsible	2. Planning and operations meet legal requirements. The planning and operations shall meet legal requirements.	Legal harvesting or production requirements shall be complied with.	L	

1	2	7	Principle 1: Management and business practices are legal and responsible	2. Planning and operations meet legal requirements. The planning and operations shall meet legal requirements.	Responsible practices in land acquisition, planning and site development should be used, including: a) integrated and participatory assessment and land-use planning should be conducted as part of the land acquisition process; and b) stakeholders should be consulted prior to land acquisition and development.	B	seems that coming up with a land-use plan is a basic tenet of sustainability. I can see stakeholder consultation being 'above and beyond' and so a best practice. I would suggest splitting the criteria into two bits - making stakeholder consultation "B" and some sort of land-use planning/ environmental analysis a "C"  My concern with many areas of principal 1, but especially regarding forest/native land conversion, is that the practice can be legally OK or protected in a certain country. But, that does not make it sustainable. For example, converting rainforest to farms in Brazil or palm plantations in SE Asia.. Legal isnt always OK. 2.7b.. who are stakeholders? What if they object? Consulted just means asked.  AFi: Aligned with AFi Core Principle 7, and the reference to AFi is appreciated. However, this appears to be the only indicator related to responsible practices, and all others focus on legality. We recommend to consider moving this indicator to a different criterion/principle, or at a minimum to the end of this one.
1	2	8					
1	3	1	Principle 1: Management and business practices are legal and responsible	3. Taxes and fees are paid. All applicable taxes and fees have been paid in a timely manner and according to legal requirements.	Legal requirements for payment of royalties, land/area taxes and fees shall be complied with.		
1	3	2	Principle 1: Management and business practices are legal and responsible	3. Taxes and fees are paid. All applicable taxes and fees have been paid in a timely manner and according to legal requirements.	Legal requirements for payment of value-added taxes and/or other sales taxes shall be complied with.		
1	3	3	Principle 1: Management and business practices are legal and responsible	3. Taxes and fees are paid. All applicable taxes and fees have been paid in a timely manner and according to legal requirements.	Legal requirements for payment of income and profit taxes shall be complied with.		
1	3	4	Principle 1: Management and business practices are legal and responsible	3. Taxes and fees are paid. All applicable taxes and fees have been paid in a timely manner and according to legal requirements.	Legal requirements for payment of transport, trade and/or export taxes shall be complied with.		
1	3	5	Principle 1: Management and business practices are legal and responsible	3. Taxes and fees are paid. All applicable taxes and fees have been paid in a timely manner and according to legal requirements.	Adequate financial transaction policies and procedures should be in place to ensure proper recording of all financial transactions, as well as to identify possible money laundering. No undisclosed or unrecorded account, fund or asset shall be established or maintained.		
1	4	1	Principle 1: Management and business practices are legal and responsible	4. Corruption is effectively avoided. Corruption shall be effectively avoided by the Organisation.	Legal requirements relating to bribery, fraud and corruption shall be complied with.		
1	4	2	Principle 1: Management and business practices are legal and responsible	4. Corruption is effectively avoided. Corruption shall be effectively avoided by the Organisation.	Payment of or accepting of bribes or other forms of corruption shall be avoided.		
1	4	3	Principle 1: Management and business practices are legal and responsible	4. Corruption is effectively avoided. Corruption shall be effectively avoided by the Organisation.	Clear and effective guidelines and policies should be developed and implemented regarding business integrity expectations relating to anti-bribery, gifts and hospitality.		
1	4	4	Principle 1: Management and business practices are legal and responsible	4. Corruption is effectively avoided. Corruption shall be effectively avoided by the Organisation.	Corporate hospitality, including the exchange of gifts, should be managed according to best practices, including that the hospitality: a) be for a legitimate business purpose, which may include developing business relationships; b) not include public officials from which a decision regarding any license, permit, authorisation or any other official act or decision is pending; c) be given in an open and transparent manner; d) and not include cash, loans or cash equivalents (such as gift certificates or vouchers).		

1	4	5	Principle 1: Management and business practices are legal and responsible	4. Corruption is effectively avoided. Corruption shall be effectively avoided by the Organisation.	Conflicts of interest should be effectively controlled. a) All conflict of interests shall be identified and declared. b) Any ownership or beneficial interest, in the Organisation, by a government official, representative of a political party or an Organisation employee is declared.		
1	4	6	Principle 1: Management and business practices are legal and responsible	4. Corruption is effectively avoided. Corruption shall be effectively avoided by the Organisation.	Any political contributions and campaign expenditures shall be publicly disclosed.		
1	5	1	Principle 1: Management and business practices are legal and responsible	5. Trade and transport are conducted legally. Trade and transport of material and products shall be conducted according to legal requirements.	Legal requirements relating to trade and transport of products shall be complied with.		
1	5	2	Principle 1: Management and business practices are legal and responsible	5. Trade and transport are conducted legally. Trade and transport of material and products shall be conducted according to legal requirements.	Legal requirements relating to the classification of products for trade and transport shall be complied with.		
1	5	3	Principle 1: Management and business practices are legal and responsible	5. Trade and transport are conducted legally. Trade and transport of material and products shall be conducted according to legal requirements.	Legal requirements relating to export and/or import shall be complied with.		
1	5	4	Principle 1: Management and business practices are legal and responsible	5. Trade and transport are conducted legally. Trade and transport of material and products shall be conducted according to legal requirements.	Legal requirements relating to offshore trading and transfer pricing shall be complied with.		
1	5	5	Principle 1: Management and business practices are legal and responsible	5. Trade and transport are conducted legally. Trade and transport of material and products shall be conducted according to legal requirements.	Legal requirements relating to the trade of CITES species shall be complied with.		
1	5	6	Principle 1: Management and business practices are legal and responsible	5. Trade and transport are conducted legally. Trade and transport of material and products shall be conducted according to legal requirements.	Legal requirements relating to due diligence or due care shall be complied with.		
2			Principle 2: Peoples wellbeing and human rights are respected				<p>*Principle-level: The principle-level text focuses on legal obligations and respect for human rights (which is great and aligned with AFI), yet there are also criteria that speak more to livelihoods/well-being (which is also great, and an important component of a sustainability standard). Consider either adding both elements in the principle-level text or adding a separate principle on community and worker livelihoods/well-being, and if possible including additional criteria on this topic (such as FSC criterion on use of local processing and services).</p> <p>add an additional new criterion about Grievances and complaints</p>
2	1	2	Principle 2: Peoples wellbeing and human rights are respected	6. Worst forms of child labour are eliminated, and employment of minors is responsibly managed. Legal requirements related to child labour shall be followed and the worst forms of child labour shall be eliminated. Where minors are employed their employment shall follow best practices.	Legal requirements related to child labour shall be complied with.		Sounds a bit odd to call for "Worst forms of child labour are eliminated and employment of minors is responsibly managed", can be interpreted as child labour is OK in general and the purpose of the framework is to remove only worst forms. UN Global Compact is clear that child labour is unacceptable (UNGC §5)
			Principle 2: Peoples wellbeing and human rights are respected	6. Worst forms of child labour are eliminated, and employment of minors is responsibly managed. Legal requirements related to child labour shall be followed and the worst forms of child labour shall be eliminated. Where minors are employed their employment shall follow best practices.	The worst forms of child labour shall not be present.		why we did not talk about the children rights and protection first in the farm or agriculture sector that described in The United Nations Convention on the Rights of the Child (UNCRC) and the indicator suggested are: children are protected including the worst forms of child labour shall not be present.

2	1	3	Principle 2: Peoples wellbeing and human rights are respected	6. Worst forms of child labour are eliminated, and employment of minors is responsibly managed. Legal requirements related to child labour shall be followed and the worst forms of child labour shall be eliminated. Where minors are employed their employment shall follow best practices.	6.3. Children under the age of 15 (or under the age for completion of compulsory education, whichever is higher) shall not be employed, except in the strict frame of the "Family Farm" work or where covered by national legislation in accordance with Article 7 of the Minimum Age Convention. a) Where young workers are employed, the employment of young people contributes to their personal education and does not expose them to undue physical risks that can harm physical, mental or emotional development. b) Young workers shall not work night shifts, during school hours, or engage in work with hazardous conditions.		This can be addressed in working hours, but if school aged workers are employed, the hours possible for them to work should be limited so that they can attend school and work on the farm simultaneously.
2	1	4	Principle 2: Peoples wellbeing and human rights are respected	6. Worst forms of child labour are eliminated, and employment of minors is responsibly managed. Legal requirements related to child labour shall be followed and the worst forms of child labour shall be eliminated. Where minors are employed their employment shall follow best practices.	Organisation should follow best practices in eliminating and preventing child labour a) Organisation should develop and implement a child labour prevention and monitoring plan after considering the results of consultations with community members and minors.		
2	2	1					
2	2	2					
2	2	3	Principle 2: Peoples wellbeing and human rights are respected	7. Modern slavery and forced labour do not occur. No form of forced labour or modern slavery occurs.	Legal requirements related to modern slavery, including forced labour and prison labour, shall be complied with.		I really think the standard can do more here. The only real requirement in this section is that "legal requirements related to modern slavery... shall be complied with". How about adding clear definitive language that no forced labor shall exist anywhere and that any foreign workers do not have passports confiscated, etc (these are just examples). There should be more than three requirements which essentially say that organizations shall comply with legal requirements (which can be hazy).
2	2	4	Principle 2: Peoples wellbeing and human rights are respected	7. Modern slavery and forced labour do not occur. No form of forced labour or modern slavery occurs.	Activities shall be implemented to stop modern slavery and forced labour.		
2	3	1	Principle 2: Peoples wellbeing and human rights are respected	8. Workers' rights are respected. Organisation takes social responsibility and ensures that the rights of workers are respected and/or actively promoted. The Organisation shall ensure respect for the International Labour Organization (ILO) eight fundamental Conventions.	Legal requirements related to Freedom of Association, Rights to Organise and Collective Bargaining shall be complied with.		Criterion 8: To be aligned with AFI, workers' rights should be respected, not just actively promoted.
2	3	2	Principle 2: Peoples wellbeing and human rights are respected	8. Workers' rights are respected. Organisation takes social responsibility and ensures that the rights of workers are respected and/or actively promoted. The Organisation shall ensure respect for the International Labour Organization (ILO) eight fundamental Conventions.	Freedom of Association, the Right to Organise and the Right to Collective Bargaining shall be respected.		
2	3	3	Principle 2: Peoples wellbeing and human rights are respected	8. Workers' rights are respected. Organisation takes social responsibility and ensures that the rights of workers are respected and/or actively promoted. The Organisation shall ensure respect for the International Labour Organization (ILO) eight fundamental Conventions.	Legal requirements related to working hours, overtime, rest time and time off, shall be complied with.		I see no indicator for ensuring that workers do not have wages withheld or unnecessarily docked for room/board. This is a real issue because if the workers aren't paid on a regular basis, but instead after the harvesting season only, then it could lead to workers needing to stay amidst really poor conditions or else they leave with 0 wages. ^This could be considered under the modern slavery or forced labor protocols, but if not - I think its worth splitting out that workers are paid in full on a regular basis (as a "C")

2	3	4	Principle 2: Peoples wellbeing and human rights are respected	8. Workers' rights are respected. Organisation takes social responsibility and ensures that the rights of workers are respected and/or actively promoted. The Organisation shall ensure respect for the International Labour Organization (ILO) eight fundamental Conventions.	Regular working hours of all workers shall not exceed 48 hours per week, with at least one full day of rest for every six consecutive days worked. Workers receive one meal period break for every six hours worked.		8.4, 8.5 Normally this indicator is a legal requirement (total working hours per week, days, rest for every six days, etc), so, all the elements are covered by indicator 8.3.  One note that is an issue on many farms... Workers (especially seasonal workers) often WANT to work well over 48 hours per week to make as much money as they can. They will follow the harvests around the country to keep high hours and they will sometimes not work at farms that will limit their hours.  I'd also suggest adding a confidential comment/complaints mechanism for workers to use.  8.4. Working hours shall align with the local labour law. Different country may have different requirement. .
2	3	5	Principle 2: Peoples wellbeing and human rights are respected	8. Workers' rights are respected. Organisation takes social responsibility and ensures that the rights of workers are respected and/or actively promoted. The Organisation shall ensure respect for the International Labour Organization (ILO) eight fundamental Conventions.	Overtime shall be voluntary and shall not result in a work week exceeding 60 total hours, except under circumstances of shorter duration where additional labour is required (e.g. peak harvest seasons).		Should this indicator also stipulate that when overtime is given, overtime pay which exceeds the normal hourly rate of the worker is expected?  8.5 Limitation of overtime shall follow local labour law  AFI: •Indicator 8.5: Expectations related to overtime are aligned with AFI; however, it should be made clear that exceptions for working overtime still need to be voluntary.
2	3	6	Principle 2: Peoples wellbeing and human rights are respected	8. Workers' rights are respected. Organisation takes social responsibility and ensures that the rights of workers are respected and/or actively promoted. The Organisation shall ensure respect for the International Labour Organization (ILO) eight fundamental Conventions.	Workers shall be treated respectfully and are never subjected to sexual abuse or harassment, or verbal, physical or psychological mistreatment.		
2	3	7	Principle 2: Peoples wellbeing and human rights are respected	8. Workers' rights are respected. Organisation takes social responsibility and ensures that the rights of workers are respected and/or actively promoted. The Organisation shall ensure respect for the International Labour Organization (ILO) eight fundamental Conventions.	The privacy rights of employees shall fully respected, including, but not limited to, whenever an employer gathers private information or implements employee-monitoring practices.		<u>Indicator 8.7:</u> The footnote to AFI Core Principle 2 seems out of place. Core Principle 2 covers all human rights, and actually does not specify expectations related to privacy rights. Recommend to move the footnote to Criterion 8.
2	3	8	Principle 2: Peoples wellbeing and human rights are respected	8. Workers' rights are respected. Organisation takes social responsibility and ensures that the rights of workers are respected and/or actively promoted. The Organisation shall ensure respect for the International Labour Organization (ILO) eight fundamental Conventions.	Workers' rights should be actively promoted and supported, including through the following: a) payment procedures guarantee the complete payment to workers of all wages due, including for overtime work; b) workers receive at least two weeks of paid vacation leave per year; and c) pregnant women who are active workers receive fully paid maternity leave of at least 12 weeks before or after birth, with at least six of these weeks being taken after birth.		The maternity leave policy in this standard is better than what Preferred By Nature provides their staff in the United States. This could be a bit of an issue if it comes to light that the standard-setting body is not complying with "B" best practice requirements. I would suggest either removing or fixing internal policies, or just changing to 'C' requirement that the Org. has a maternity leave plan and leave it at the 6 weeks after birth (which is really bare bones, but at least it sidesteps the fact that USA policy here is currently less).  Finally, you realize that there are NEPCon employees who don't even get 3 months paid maternity leave right? I'd suggest we update our benefits package before implementing this requirement :) Specifically on 8.8 please address if this is required for ALL workers (seasonal and permanent), or just full time workers.  8.8 (b). Number of paid vacation leave is usually stated in the local labour law. 8.8 (c). Statutory maternity leave shall align with local labour law. Even some developed country do not have statutory maternity/ paternity leave. E.g. USA. •Indicator 8.8: Requirement 'a' (payment procedures) is an internationally-recognized workers' rights and should be a core requirement to be aligned with AFI; Requirement 'c' (maternity leave) is also a core requirement.
2	3	9					AFI: •Criterion 10: The elements within this criterion are aligned with AFI. The scope of this criterion is unclear in that it states, "Employment is responsible.." even though there are multiple other criteria in this principle that also speak to responsible employment (not just this criterion). Suggest to focus this criterion on wages (10.4-10.6) and move the others elsewhere.
							•Indicator 10.3: This is covered under remediation.
2	4	1	Principle 2: Peoples wellbeing and human rights are respected	9. Discrimination is not occurring. There shall be no discrimination related to employment or occupation.	Legal requirements related to discrimination in employment shall be complied with.		
2	4	1	Principle 2: Peoples wellbeing and human rights are respected	9. Discrimination is not occurring. There shall be no discrimination related to employment or occupation.	Discrimination in relation to employment and occupation shall not occur.		This should be clarified. What is discrimination related to employment or occupation? What about gender, religion, race, etc? These should be added.

2	4	2	Principle 2: Peoples wellbeing and human rights are respected	9. Discrimination is not occurring. There shall be no discrimination related to employment or occupation.	Organisation should actively work to prevent discrimination.		
2	5	1	Principle 2: Peoples wellbeing and human rights are respected	10. Employment is responsible and considers minimum and living wage. Recruitment and employment shall be conducted according to legal requirements or higher standards.	Legal requirements related to recruitment and employment shall be complied with.		
2	5	2	Principle 2: Peoples wellbeing and human rights are respected	10. Employment is responsible and considers minimum and living wage. Recruitment and employment shall be conducted according to legal requirements or higher standards.	Recruitment shall take place in a way that avoids discrimination and ensures a fair and transparent process.		
2	5	3	Principle 2: Peoples wellbeing and human rights are respected	10. Employment is responsible and considers minimum and living wage. Recruitment and employment shall be conducted according to legal requirements or higher standards.	A grievance mechanism is available for workers.		
2	5	4	Principle 2: Peoples wellbeing and human rights are respected	10. Employment is responsible and considers minimum and living wage. Recruitment and employment shall be conducted according to legal requirements or higher standards.	Legal requirements related to wages and other payments shall be complied with.		
2	5	5	Principle 2: Peoples wellbeing and human rights are respected	10. Employment is responsible and considers minimum and living wage. Recruitment and employment shall be conducted according to legal requirements or higher standards.	Responsible remuneration is adopted.		Can you find another source for footnote 27 - one has to purchase the book in order to review the terms/definitions. Might be best to cite the actual definition somewhere (unless this has already been done in the std, then please ignore). See also other comment above regarding wage withholding/docking and ensuring its considered somewhere in this standard.  10.5. More clarification needed for responsible remuneration.  *Indicator 10.5 It is not clear what "responsible remuneration" means or is verified.
2	5	6	Principle 2: Peoples wellbeing and human rights are respected	10. Employment is responsible and considers minimum and living wage. Recruitment and employment shall be conducted according to legal requirements or higher standards.	A living wage approach to fair compensation should be implemented.		10.6. Living wage is difficult to implement as it may differs at different time and location. E.g. living wage for Kuala Lumpur may change in next year compare to this year. If will be challenging as the company will have to continuously calculate the living wage and have different wage rate depending on location even within the same country. This may also result in shortage of worker at some locations due to lower living wage. That's why most of the countries require company to follow a standard minimum wage instead of living wage.  *Indicator 10.6: To be aligned with AFI, 'living wage' should be a requirement (achieved over a period of time if necessary) and not just best practice.
2	6	1	Principle 2: Peoples wellbeing and human rights are respected	11. Workplaces are safe and healthy. The workplace shall be safe and healthy, and the employer shall ensure that workers have access to and use appropriate Personal Protective Equipment, commensurate with the activities undertaken.	Legal requirements related to workplace health and safety shall be complied with.		
2	6	2	Principle 2: Peoples wellbeing and human rights are respected	11. Workplaces are safe and healthy. The workplace shall be safe and healthy, and the employer shall ensure that workers have access to and use appropriate Personal Protective Equipment, commensurate with the activities undertaken.	Production equipment and utilities shall be equipped with machine guards and emergency stops and undergo routine preventive maintenance.		
2	6	3	Principle 2: Peoples wellbeing and human rights are respected	11. Workplaces are safe and healthy. The workplace shall be safe and healthy, and the employer shall ensure that workers have access to and use appropriate Personal Protective Equipment, commensurate with the activities undertaken.	The workplace shall be hygienic with adequate lighting, ambient temperature, ventilation, sanitation, potable drinking water, sanitary facilities, and food storage.		11.3. Require more explanation on what is "ambient temperature"
2	6	4	Principle 2: Peoples wellbeing and human rights are respected	11. Workplaces are safe and healthy. The workplace shall be safe and healthy, and the employer shall ensure that workers have access to and use appropriate Personal Protective Equipment, commensurate with the activities undertaken.	Workers shall receive appropriate and recorded safety and health training prior to starting work and on a regular basis thereafter. Such training includes the awareness of the risks and working procedures related to the task, adequate usage of work-related tools, machines, stations, and Personal Protective Equipment.		

2	6	5	Principle 2: Peoples wellbeing and human rights are respected	11. Workplaces are safe and healthy. The workplace shall be safe and healthy, and the employer shall ensure that workers have access to and use appropriate Personal Protective Equipment, commensurate with the activities undertaken.	Personal Protective Equipment and tools, shall be available to and used by workers, be in good condition, and appropriate for the purpose.		
2	6	6	Principle 2: Peoples wellbeing and human rights are respected	11. Workplaces are safe and healthy. The workplace shall be safe and healthy, and the employer shall ensure that workers have access to and use appropriate Personal Protective Equipment, commensurate with the activities undertaken.	Workers handling chemicals shall have access to appropriate facilities for cleaning and washing.		Indicator 11.6: Regarding chemical use, it would be good to include language here that workers have received appropriate training if using chemicals and that they understand the health and safety considerations associated with their use.  Suggest ensuring employees have a safe and clean area for taking breaks and eating meals. Workers handling hazardous materials should have specific training on how to use these materials and the PPE required. Additionally, requirements should ensure that any regulations or licenses regarding pesticide applicators are met. -
2	6	7	Principle 2: Peoples wellbeing and human rights are respected	11. Workplaces are safe and healthy. The workplace shall be safe and healthy, and the employer shall ensure that workers have access to and use appropriate Personal Protective Equipment, commensurate with the activities undertaken.	Workers shall have access to first-aid equipment, as well as medical services in case of emergencies.		1. annual medical surveillance for workers handling chemicals 2. workers handling chemical shall not pregnant or breastfeeding
2	6	8	Principle 2: Peoples wellbeing and human rights are respected	11. Workplaces are safe and healthy. The workplace shall be safe and healthy, and the employer shall ensure that workers have access to and use appropriate Personal Protective Equipment, commensurate with the activities undertaken.	Organisation should actively promote a healthy and safe work environment.	B	Indicator 11.8: To me, this is a core requirement, not a best practice.  11.8 should be C, not B.
2	7	1	Principle 2: Peoples wellbeing and human rights are respected	12. Employer-provided housing shall be safe and hygienic. Where housing is provided it shall be provided according to legal minimum requirements or higher.	Legal requirements related to housing of workers shall be complied with.		
2	7	2	Principle 2: Peoples wellbeing and human rights are respected	12. Employer-provided housing shall be safe and hygienic. Where housing is provided it shall be provided according to legal minimum requirements or higher.	Organisation should provide housing to workers if no affordable or safe accommodation is otherwise available.		
2	7	3	Principle 2: Peoples wellbeing and human rights are respected	12. Employer-provided housing shall be safe and hygienic. Where housing is provided it shall be provided according to legal minimum requirements or higher.	If workers' pay for housing, the cost of housing shall be commensurate with the pay and comparable to similar housing in the area/industry.		
2	7	4	Principle 2: Peoples wellbeing and human rights are respected	12. Employer-provided housing shall be safe and hygienic. Where housing is provided it shall be provided according to legal minimum requirements or higher.	Employer-provided housing shall be safe and healthy.		
2	7	5	Principle 2: Peoples wellbeing and human rights are respected	12. Employer-provided housing shall be safe and hygienic. Where housing is provided it shall be provided according to legal minimum requirements or higher.	Procedures for emergency management, ensuring emergency exits, first-aid supplies, fire detection and suppression equipment, training and drills, shall be in place and implemented.		
2	7	6	Principle 2: Peoples wellbeing and human rights are respected	12. Employer-provided housing shall be safe and hygienic. Where housing is provided it shall be provided according to legal minimum requirements or higher.	Organisation shall provide workers' families with access to medical services.		This requirement is vague and can be interpreted to mean many different things. Does this mean they should get health insurance? Does it mean they should have access to a doctor? how often? As written, the certified entity could meet this requirement by simply providing access to a non-trained health provider.  12.6. The scope of workers' families should be better defined. Suggest to reword as worker's immediate family.
2	8	1	Principle 2: Peoples wellbeing and human rights are respected	13. Gender equality is maintained and protected. Gender equality shall be protected and promoted according to legal requirements or higher standards.	Legal requirements related to gender-based discrimination shall be complied with.		Indicator 13: What about people who identify as non-binary? What about minorities who may face discrimination? Can this language be broadened beyond gender to include other forms of discrimination? At the very least, I would replace the term "gender equality" with "gender equity".  I would expect that not a lot of countries have legal requirements for gender discrimination? What about sexual orientation?

2	8	2	Principle 2: Peoples wellbeing and human rights are respected	13. Gender equality is maintained and protected. Gender equality shall be protected and promoted according to legal requirements or higher standards.	Irrespective of gender, there shall be equal remuneration for work of equal value.		
2	8	3	Principle 2: Peoples wellbeing and human rights are respected	13. Gender equality is maintained and protected. Gender equality shall be protected and promoted according to legal requirements or higher standards.	Opportunities should be explored to include women in work that promotes worker diversity and equal opportunity in the community.		13.3 should by C, and not B, using "Opportunities shall be explored..." 1. pregnancy test not as a part of discrimination
2	9	1	Principle 2: Peoples wellbeing and human rights are respected	14. Fair Pricing is implemented supply chains. Where Organisations are purchasing commodities or materials, they shall implement a policy for fair pricing.	Organisations shall pay at least a price to the producer that enable producers to meet requirements of this Framework, including paying workers at least the minimum "living wage".		As written with only one indicator, this seems very hard to verify. 14.1. Prefer to use minimum wage instead of minimum living wage.
2	10	1	Principle 2: Peoples wellbeing and human rights are respected	15. The rights of Indigenous Peoples are respected. The rights of Indigenous Peoples shall be respected according to the UN Declaration on the Rights of Indigenous Peoples and the ILO Indigenous and Tribal Peoples Convention	Legally recognised Indigenous People affected by land-use or other operations shall be identified.		•Criterion 15: To be aligned with AFI, the criterion needs to include use of FPIC (AFI Core Principle 2.2.3, 2.2.4). Remove indicator 15.1 and 15.2 There are much problem with "Legally recognized Indigenous Peoples", more suggested to use indicator 15.3 as replacement.
2	10	2	Principle 2: Peoples wellbeing and human rights are respected	15. The rights of Indigenous Peoples are respected. The rights of Indigenous Peoples shall be respected according to the UN Declaration on the Rights of Indigenous Peoples and the ILO Indigenous and Tribal Peoples Convention	Legally recognised Indigenous Peoples' rights shall be respected.		
2	10	3	Principle 2: Peoples wellbeing and human rights are respected	15. The rights of Indigenous Peoples are respected. The rights of Indigenous Peoples shall be respected according to the UN Declaration on the Rights of Indigenous Peoples and the ILO Indigenous and Tribal Peoples Convention	The company shall define and identify Indigenous Peoples and their rights in accordance with ILO Convention 169 and the United Nations Declaration on the Rights of Indigenous Peoples even if the national regulations of the host state fails to fully recognize these rights, fails to recognize certain indigenous groups as collective rights-holders or uses terminology or classifications which excludes the term indigenous.		
2	10	4	Principle 2: Peoples wellbeing and human rights are respected	15. The rights of Indigenous Peoples are respected. The rights of Indigenous Peoples shall be respected according to the UN Declaration on the Rights of Indigenous Peoples and the ILO Indigenous and Tribal Peoples Convention	There are no unresolved claims by Indigenous Peoples of collective land titling.		15.4. Unresolved claims should be acceptable provided there is continuous resolution process in place. Most of the resolution process related to land dispute may take a long time to solve. 15.4 There are no unresolved claims by Indigenous Peoples of collective land titling.....in case no Indigenous peoples in that specific part of land, therefore unresolved claims are not existed. That shall be fine, no need to prove for this indicator.
2	10	5	Principle 2: Peoples wellbeing and human rights are respected	15. The rights of Indigenous Peoples are respected. The rights of Indigenous Peoples shall be respected according to the UN Declaration on the Rights of Indigenous Peoples and the ILO Indigenous and Tribal Peoples Convention	A human rights due diligence process shall be carried out in accordance with principles 17-21 of the UN Guiding Principles on Business and Human Rights, to identify actual or potential adverse impacts on Indigenous Peoples, at the earliest possible stage and prior to any activity which may affect indigenous peoples.		•Indicator 15.5: To be aligned with AFI, human rights due diligence should be implemented for assessing/addressing risk related to workers' rights (and local communities) and not just risks to Indigenous Peoples.
2	11	1	Principle 2: Peoples wellbeing and human rights are respected	16. Community rights are respected. The rights of local communities shall be respected and promoted. Where the organisation has caused or contributed to adverse impacts to Indigenous Peoples', communities' or workers' rights, the organisation shall provide for remediation through an adequate, legitimate, and culturally appropriate mechanism	Local communities affected by the operations of the Organisation shall be identified.		• Criterion 16: What was the rationale for having separate criteria for community rights rather than integrate them into the criteria for Indigenous Peoples' rights (as per AFI: IP/LC rights). This would help ensure that the rights of both groups are complete – e.g., some indicators listed here such as Indicator 16.6. are also relevant in the context of Indigenous Peoples' rights yet are not included there.



2	11	2	Principle 2: Peoples wellbeing and human rights are respected	16. Community rights are respected. The rights of local communities shall be respected and promoted. Where the organisation has caused or contributed to adverse impacts to Indigenous Peoples', communities' or workers' rights, the organisation shall provide for remediation through an adequate, legitimate, and culturally appropriate mechanism	Legally recognised customary and community rights shall be identified and respected.		Remove indicator 16.2. no need to divide customary and community right to legal or not legal.
2	11	3	Principle 2: Peoples wellbeing and human rights are respected	16. Community rights are respected. The rights of local communities shall be respected and promoted. Where the organisation has caused or contributed to adverse impacts to Indigenous Peoples', communities' or workers' rights, the organisation shall provide for remediation through an adequate, legitimate, and culturally appropriate mechanism	Organisation shall identify and respect the rights of local communities, where these are not legally defined.		
2	11	4	Principle 2: Peoples wellbeing and human rights are respected	16. Community rights are respected. The rights of local communities shall be respected and promoted. Where the organisation has caused or contributed to adverse impacts to Indigenous Peoples', communities' or workers' rights, the organisation shall provide for remediation through an adequate, legitimate, and culturally appropriate mechanism	Organisation shall provide reasonable opportunities for employment, training and other services to local communities.		*Indicator 16.4: This is an important requirement to include in the framework; however, is it a "community right"? Consider a separate criterion or principle for community well-being and livelihoods where this and other requirements could be placed.
2	11	5	Principle 2: Peoples wellbeing and human rights are respected	16. Community rights are respected. The rights of local communities shall be respected and promoted. Where the organisation has caused or contributed to adverse impacts to Indigenous Peoples', communities' or workers' rights, the organisation shall provide for remediation through an adequate, legitimate, and culturally appropriate mechanism	Organisation shall identify and protect sites and resources within the area of operation, fundamental for satisfying the basic needs of local communities.		
2	11	6	Principle 2: Peoples wellbeing and human rights are respected	16. Community rights are respected. The rights of local communities shall be respected and promoted. Where the organisation has caused or contributed to adverse impacts to Indigenous Peoples', communities' or workers' rights, the organisation shall provide for remediation through an adequate, legitimate, and culturally appropriate mechanism	Organisation shall identify and protect sites, resources, habitats and of cultural, archaeological, or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities.		
2	12	1	Principle 2: Peoples wellbeing and human rights are respected	17. Remediation measures are implemented as appropriate. Where the organisation has caused or contributed to adverse impacts to Indigenous Peoples', communities' or workers' rights, the organisation shall provide for remediation through an adequate, legitimate, and culturally appropriate mechanism	Where the organisation has caused or contributed to adverse impacts to Indigenous Peoples', communities' or workers' rights, the organisation shall provide for remediation through an adequate, legitimate and culturally appropriate remedial mechanism which shall be defined in agreement with the affected parties' legitimate representatives.	c	This section seems like a very complex topic that will be hard to summarize in attainable requirements. For example what if the organization is unable to come to an agreement on what is reasonable restitution with concerned stakeholders? Or, more generally, what if the organization doesn't agree that it has cause or contributed to adverse impacts at all? That itself can be very hard to gauge and based on opinion.
2	12	2	Principle 2: Peoples wellbeing and human rights are respected	17. Remediation measures are implemented as appropriate. Where the organisation has caused or contributed to adverse impacts to Indigenous Peoples', communities' or workers' rights, the organisation shall provide for remediation through an adequate, legitimate, and culturally appropriate mechanism	The organisation shall establish an effective grievance mechanism that adheres to the Effectiveness Criteria of the UN Guiding Principles on Business and Human Rights.	c	17.2 not included the type of indicator ©

2	12	3	Principle 2: Peoples wellbeing and human rights are respected	17. Remediation measures are implemented as appropriate. Where the organisation has caused or contributed to adverse impacts to Indigenous Peoples', communities' or workers' rights, the organisation shall provide for remediation through an adequate, legitimate, and culturally appropriate mechanism	The Organisation shall develop a plan for remediation that includes clear geographic and timebound targets for implementation. Remediation plans shall be: a) developed in consultation with stakeholders; b) developed and implemented in collaboration with relevant experts; and made available to the public		<ul style="list-style-type: none"> <li>•Indicator 17.3: Development of a remediation plan is aligned with AFI; however, it should be made clear that consultation is also done with rights-holders and not just stakeholders.</li> <li>• AFI commitment to protect the rights of environmental and human rights defenders appears to be missing.</li> </ul>
2	12	4	Principle 2: Peoples wellbeing and human rights are respected	17. Remediation measures are implemented as appropriate. Where the organisation has caused or contributed to adverse impacts to Indigenous Peoples', communities' or workers' rights, the organisation shall provide for remediation through an adequate, legitimate, and culturally appropriate mechanism	Outcomes of the mutually agreed remediation process shall as a minimum: a) Ensure a prompt cessation of violating actions and provide a credible guarantee that they are not repeated. b) If possible, provide full restitution and where full restitution is not possible provide just, fair and prompt compensation. c) Benefit entire communities or groups rather than individual people.		
2	12	5	Principle 2: Peoples wellbeing and human rights are respected	17. Remediation measures are implemented as appropriate. Where the organisation has caused or contributed to adverse impacts to Indigenous Peoples', communities' or workers' rights, the organisation shall provide for remediation through an adequate, legitimate, and culturally appropriate mechanism	The Organisation shall not divest its interests in land to avoid remediation or until outstanding grievances are fully resolved, or obligations have been legally transferred to another party (e.g., the new owner).		17.5. This indicator is interfering the company's business decision. Divestment should be allowable provided all the necessary due-diligence on the outstanding issues made to the new owner.
2	12	6	Principle 2: Peoples wellbeing and human rights are respected	17. Remediation measures are implemented as appropriate. Where the organisation has caused or contributed to adverse impacts to Indigenous Peoples', communities' or workers' rights, the organisation shall provide for remediation through an adequate, legitimate, and culturally appropriate mechanism	If the Organisation has or is acquiring interests in commodity-producing properties, it shall remediate past harms, unless this responsibility is legally held by another party.		17.6. The word "past harm" should be further defined. How far back?
			P3 only				Cut of date for deforestation in Indonesia could use moratorium primary forest and peatland conversion as momentum (2011)
3	1	1	Principle 3: Nature and the environment are protected	18. Natural ecosystems are protected from degradation and conversion. The activities of the Organisation shall not contribute to deforestation and conversion of natural ecosystems to other land uses. Land-use planning, and management shall take place in a way that protects or restores natural ecosystems.	Legal requirements relating to the conversion of natural forests or other natural ecosystems shall be complied with.		
3	1	2	Principle 3: Nature and the environment are protected	18. Natural ecosystems are protected from degradation and conversion. The activities of the Organisation shall not contribute to deforestation and conversion of natural ecosystems to other land uses. Land-use planning, and management shall take place in a way that protects or restores natural ecosystems.	Legal requirements related to environmental impact assessments shall be complied with.		
3	1	3	Principle 3: Nature and the environment are protected	18. Natural ecosystems are protected from degradation and conversion. The activities of the Organisation shall not contribute to deforestation and conversion of natural ecosystems to other land uses. Land-use planning, and management shall take place in a way that protects or restores natural ecosystems.	Legal requirements for the use of fire as a and preparation and management tool shall be complied with.		Again, my main concern is that in many countries there are not legal requirements existing that cover these indicators.

3	1	4	Principle 3: Nature and the environment are protected	18. Natural ecosystems are protected from degradation and conversion. The activities of the Organisation shall not contribute to deforestation and conversion of natural ecosystems to other land uses. Land-use planning, and management shall take place in a way that protects or restores natural ecosystems.	Deforestation of natural forests or conversion of other natural ecosystems is not taking place. a) For perennial crops, the plants shall not have replaced natural vegetation within the last 10 years and must be at least at the second rotation. b) For annual crops, the farms shall not have replaced natural forest or ecosystems within the last 10 years. c) There shall be no conversion of peat soils for agricultural or plantation purposes. d) Procedures to avoid fires in the context of deforestation and conversion shall be developed and implemented. e) Activities to stop or protect against the conversion of non-forest natural ecosystems to agriculture, plantation forestry, intensive livestock production, or other land uses shall be implemented. This includes taking appropriate measures to support the long-term protection of natural ecosystems in the area of influence.		<p>*Criterion 18 (and Indicator 18.4): It is great that the framework has adopted a comprehensive approach to no-conversion of natural ecosystems, and the requirement for no-deforestation or no-conversion of other natural ecosystems is aligned with AFI. The criterion, however, is missing other key elements of no-deforestation/no-conversion commitments:</p> <ul style="list-style-type: none"> <li>oDefinitions for deforestation, conversion, natural forests, and natural ecosystems; alignment of definitions with AFI (preferably using/referencing AFI)</li> <li>oCutoff date aligned with AFI guidance. Specifically, if a sectoral cutoff date exists, then companies should adhere to that date; if one does not exist (for no-deforestation commitments), a date of no later than January 1, 2020 should be followed. It is not clear why the framework has chosen to use a 'rolling' cutoff date, or if the option was considered to have both a 'hard' cutoff date that aligns with AFI and a 'rolling one', with restoration/compensation measures in place if the earlier cutoff date is breached.</li> </ul> <p>18.4: "In the last ten years"; I would use a hard cutoff date or dates instead, since as worded, this would allow organizations who are converting land today to use NEPCo's seal in 10 years. 18.4.c also seems redundant to me, unless the Framework seeks to prohibit any conversion of peat soils even if such conversion was historical. 18.4.d: If deforestation/conversion is prohibited in the Framework, this seems unnecessary.</p> <p>18.4 Require definition on natural forests and natural ecosystems. 18.4 (a) This indicator is not possible to be implemented at least for palm oil industry. One cycle of oil palm planting is 25 years. Second rotation means 50 years. 18.4 (c) Cut-off date should be determined. 18.4 (e) Definition needed for non-forest natural ecosystem.</p> <p>Suggestion that the new UK legislation bill on illegal deforestation free commodities from land which is rented should be added in.</p>
3	2	1	Principle 3: Nature and the environment are protected	19. High Conservation Values (HCVs) are identified and protected. High Conservation Values shall be identified, protected and enhanced.	Legal requirements relating to biodiversity protection, protected sites, and protection of endangered/protected species shall be complied with.		
3	2	2	Principle 3: Nature and the environment are protected	19. High Conservation Values (HCVs) are identified and protected. High Conservation Values shall be identified, protected and enhanced.	Animals that are endangered or protected shall not be hunted, killed or held captive.		<p>Indicator 19.2: As defined by who? The state? The country? The IUCN? Any of the above? Clarify which framework(s) this indicator is being evaluated against. -</p> <p>Revise to "No animal" should be hunted, killed, or held captive unless part of an IPM plan.</p>
3	2	3	Principle 3: Nature and the environment are protected	19. High Conservation Values (HCVs) are identified and protected. High Conservation Values shall be identified, protected and enhanced.	The Organisation shall conduct an assessment to identify the presence of HCVs.		Indicator 19.3: I would include the words "credible" and "thorough" here.
3	2	4	Principle 3: Nature and the environment are protected	19. High Conservation Values (HCVs) are identified and protected. High Conservation Values shall be identified, protected and enhanced.	The Organisation shall develop and implement strategies to protect the identified HCVs.		Businesses should refer to the UN biodiversity commitment as the key direction for biodiversity or refer to the UN Biodiversity/Nature Summit in September 2020 for future developments on this target. This is currently covered in 19 - 19. High Conservation Values (HCVs) are identified and protected, but I can't find the link to the current reporting metric being used for this, and whether it's aligned with the UN goal? I think this should also be referred to in 25. Natural ecosystems are restored as appropriate
3	2	5	Principle 3: Nature and the environment are protected	19. High Conservation Values (HCVs) are identified and protected. High Conservation Values shall be identified, protected and enhanced.	The Organisation should develop and implement strategies to enhance the identified HCVs.		
3	2	6	Principle 3: Nature and the environment are protected	19. High Conservation Values (HCVs) are identified and protected. High Conservation Values shall be identified, protected and enhanced.	Identification, protection, and enhancement activities relevant to HCVs shall be carried out in consultation with relevant and/or affected stakeholders and experts.		19.6. Require example of enhancement activities.
3	2	7	Principle 3: Nature and the environment are protected	19. High Conservation Values (HCVs) are identified and protected. High Conservation Values shall be identified, protected and enhanced.	Organisation shall regularly monitor any changes in the status of High Conservation Values and adapt management to secure continued protection. The monitoring shall be proportionate to the scale, intensity and risk of activities.		

3	3	1	Principle 3: Nature and the environment are protected	20. Chemicals are used cautiously with minimal negative impacts. The use of chemicals shall be avoided where possible and – where used as agents to control weeds and pests or for fertilisation –shall be applied in ways that protect human health, as well as ensuring minimal impacts on the environment.	Legal requirements relating to chemical use and storage shall be complied with.		Criteria 20: What about including the development of ESRAs here? Also, what about including wording around using chemicals at the most appropriate times and the lowest rates that are effective? -
3	3	2	Principle 3: Nature and the environment are protected	20. Chemicals are used cautiously with minimal negative impacts. The use of chemicals shall be avoided where possible and – where used as agents to control weeds and pests or for fertilisation –shall be applied in ways that protect human health, as well as ensuring minimal impacts on the environment.	Legal requirements relating to the use and storage of petroleum-based products shall be complied with.		
3	3	3	Principle 3: Nature and the environment are protected	20. Chemicals are used cautiously with minimal negative impacts. The use of chemicals shall be avoided where possible and – where used as agents to control weeds and pests or for fertilisation –shall be applied in ways that protect human health, as well as ensuring minimal impacts on the environment.	Organisation shall meet the requirements of the WHO International Code of Conduct on Pesticide Management – Guidelines on Highly Hazardous Chemicals		
3	3	4	Principle 3: Nature and the environment are protected	20. Chemicals are used cautiously with minimal negative impacts. The use of chemicals shall be avoided where possible and – where used as agents to control weeds and pests or for fertilisation –shall be applied in ways that protect human health, as well as ensuring minimal impacts on the environment.	Chemical drift, run-off or spills shall be effectively controlled.		
3	3	5	Principle 3: Nature and the environment are protected	20. Chemicals are used cautiously with minimal negative impacts. The use of chemicals shall be avoided where possible and – where used as agents to control weeds and pests or for fertilisation –shall be applied in ways that protect human health, as well as ensuring minimal impacts on the environment.	Organisation shall apply chemicals with known risks for pollinators only if: a) Less toxic pesticides are not available; b) Exposure to natural ecosystems is minimised; and c) Contact of pollinators with these substances can be minimised.		Indicator 20.5: This is great, but what about risks of certain chemicals to other keystone species or top predators as well? Although it is clearly illegal now, for example, think of chemicals like DDT and their effects on bald eagle eggs in the US in the 1950s. Can you add an additional indicator that is supplementary to the indicator on pollinators that would address this?  I'd suggest adding indicators that go above legal requirements. As with my previous comments, these should be met regardless of the presence of legal requirements Further, evaluation of these requirements will take a specially trained auditor who is capable of judging if the farm has effectively and accurately minimized the contact of pollinator affecting pesticides.
3	3	6	Principle 3: Nature and the environment are protected	20. Chemicals are used cautiously with minimal negative impacts. The use of chemicals shall be avoided where possible and – where used as agents to control weeds and pests or for fertilisation –shall be applied in ways that protect human health, as well as ensuring minimal impacts on the environment.	Organisation should promote organic or low chemical use production and actively seek to replace chemicals with alternative components/ingredients.		Indicator 20.6: add the words "or methods". In my opinion, this indicator should be a core requirement, not a best practice, since this is a sustainability Framework.
3	4	1	Principle 3: Nature and the environment are protected	21. Waste is reduced and managed appropriately. Waste from production or activities related to production shall be managed and minimised.	Legal requirements relating to waste and residue management shall be complied with.		Indicator 21.2 and 21.3: add the words "or near"
3	4	2	Principle 3: Nature and the environment are protected	21. Waste is reduced and managed appropriately. Waste from production or activities related to production shall be managed and minimised.	Wastewater from processing operations is not discharged into aquatic ecosystems unless it has undergone treatment.		
3	4	3	Principle 3: Nature and the environment are protected	21. Waste is reduced and managed appropriately. Waste from production or activities related to production shall be managed and minimised.	Untreated sewage shall not be discharged into aquatic ecosystems.		This should be revised to say that untreated sewage is properly disposed of and not simply "not dumped in aquatic ecosystems".. They could still dump it anywhere else and be compliant?

3	4	4	Principle 3: Nature and the environment are protected	21. Waste is reduced and managed appropriately. Waste from production or activities related to production shall be managed and minimised.	Waste storage, treatment and disposal practices shall not pose health or safety risks to farmers, workers, other people, or natural ecosystems.		add new indicator related the handling and disposal for ex-chemical / pesticide containers
3	4	5	Principle 3: Nature and the environment are protected	21. Waste is reduced and managed appropriately. Waste from production or activities related to production shall be managed and minimised.	Waste shall not be burned, except in incinerators technically designed for the specific waste type.		It was felt that waste should be reported and measured under the International WRI Food Loss and Waste Protocol and that all waste which can't be reduced, recycled or repurposed is managed responsibly i.e. not send to landfill, no harmful/hazardous chemicals dumped etc. Is there scope for including reference to a move towards more circular economies as a contributor to restoring natural ecosystems? This currently doesn't look to be covered at all in your framework, yet is a key area of focus for many businesses right now - the best reference point for us is the Ellen MacArthur Foundation's Circular Economy Framework, Case Studies & Food Initiative.
3	4	6	Principle 3: Nature and the environment are protected	21. Waste is reduced and managed appropriately. Waste from production or activities related to production shall be managed and minimised.	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, should be developed and implemented.		21.6 Should be a C indicator, not B.
3	5	1	Principle 3: Nature and the environment are protected	22. Water resources are protected and used efficiently. Where water is used as part of the production system, the Organisation shall ensure that legal requirements are met – as well as ensure that any water use and impacts on water resources are managed.	Legal requirements for use of water (surface or ground water) shall be complied with.		*Criterion 22: It is great that protection of water resources is included this framework. While outside the scope of Afi, we recommend a more robust criterion that incorporates elements from FSC to protect or restore natural water courses, water bodies, riparian zones and their connectivity.
3	5	2	Principle 3: Nature and the environment are protected	22. Water resources are protected and used efficiently. Where water is used as part of the production system, the Organisation shall ensure that legal requirements are met – as well as ensure that any water use and impacts on water resources are managed.	Organisation shall optimise use of water and reduce potential negative impacts on production and the surrounding environment.		
3	5	3	Principle 3: Nature and the environment are protected	22. Water resources are protected and used efficiently. Where water is used as part of the production system, the Organisation shall ensure that legal requirements are met – as well as ensure that any water use and impacts on water resources are managed.	Organisation should have in place a water management plan that includes the following: a) Measurement and monitoring of water resources b) Set target for water management c) Define actions to achieve targets d) Set timelines to reach targets e) Resource allocation.		Criterion 22 is about the use of water as part of the production system, so, indicator 22.3 and 22.5 should be core indicators.
3	5	4	Principle 3: Nature and the environment are protected	22. Water resources are protected and used efficiently. Where water is used as part of the production system, the Organisation shall ensure that legal requirements are met – as well as ensure that any water use and impacts on water resources are managed.	The Organisation should use best available techniques or new innovative ideas to optimise water use.		
3	5	5	Principle 3: Nature and the environment are protected	22. Water resources are protected and used efficiently. Where water is used as part of the production system, the Organisation shall ensure that legal requirements are met – as well as ensure that any water use and impacts on water resources are managed.	The Organisation should promote water efficiency and avoid water pollution.		Indicator 22: For both farming and forestry, it seems there should be some mention of BMPs (use and/or maintenance of culverts, water bars, etc.) here. Indicator 22.5: This seems like a core requirement to me (the part about avoiding water pollution)  It was felt that companies should be being asked to join a catchment project to support water conservation via the WWF water catchment and stewards projects under their 'Freshwater' and 'Stewardship' initiatives
3	6	1	Principle 3: Nature and the environment are protected	23. Soil is conserved and managed appropriately. Organisation shall ensure that any negative impacts on soils are managed and minimised.	Legal requirements related to soil management are complied with.		
3	6	2	Principle 3: Nature and the environment are protected	23. Soil is conserved and managed appropriately. Organisation shall ensure that any negative impacts on soils are managed and minimised.	Organisation shall reduce water and wind erosion through practices such as ground covers, mulches, re-vegetation of steep areas, terracing, filter strips, or minimisation of herbicide use to protect soils.		

3	6	3	Principle 3: Nature and the environment are protected	23. Soil is conserved and managed appropriately. Organisation shall ensure that any negative impacts on soils are managed and minimised.	The Organisation should select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimise soil erosion.		Indicators 23.3: This seems like a core requirement for a sustainability Framework to me
3	6	4	Principle 3: Nature and the environment are protected	23. Soil is conserved and managed appropriately. Organisation shall ensure that any negative impacts on soils are managed and minimised.	The Organisation should manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials.		
3	6	5	Principle 3: Nature and the environment are protected	23. Soil is conserved and managed appropriately. Organisation shall ensure that any negative impacts on soils are managed and minimised.	The Organisation should manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances.		
3	6	6	Principle 3: Nature and the environment are protected	23. Soil is conserved and managed appropriately. Organisation shall ensure that any negative impacts on soils are managed and minimised.	Organisation should reduce soil compaction through no-till or reduced-tillage farming, low pressure tyres, and/or restrictions on vehicle size and access times and locations.		23.6. Requirements for this indicator is overly specific. E.g. vehicle size and tyre pressure are depending on task application and necessity.
3	7	1	Principle 3: Nature and the environment are protected	24. Animal health and welfare is secure. The health and welfare of animals shall be ensured and protected.	Legal requirements relating to animal health and welfare shall be complied with.		
3	7	2	Principle 3: Nature and the environment are protected	24. Animal health and welfare is secure. The health and welfare of animals shall be ensured and protected.	Animal health and well-being is supported and promoted, through the following: a) Biological, chemical and physical risks for animals and workers shall be minimised. b) Best practices for animal feeding and breeding shall be used. c) Animals of robust breeds adapted to local conditions and farming systems shall be selected, and breeds associated with health and welfare problems (e.g. conformation and excessive growth rate) shall be avoided. d) Cloned or genetically modified animals and their derivatives in the feed/ food chain shall not be used. e) The stocking rate and rotation of on-farm forage production is managed to maintain healthy and productive livestock feeding and reduce parasite contamination. f) Animal drinking water and feeding sources shall not be contaminated by on-farm effluents. g) All staff engaged in animal management shall have the necessary experience, skills and training to ensure best practices are used. h) Good husbandry systems and practices shall be used to prevent occurrence of diseases and to minimise the use of veterinary drugs.		f: Revise to say that animals should have available, fresh, and clean drinking water. Add indicators to ensure that farm animals do not experience feed-lot conditions where they stand shoulder to shoulder in their own waste.

3	7	3	Principle 3: Nature and the environment are protected	24. Animal health and welfare is secure. The health and welfare of animals shall be ensured and protected.	Transportation of live animals shall comply with the five freedoms of the World Organisation for Animal Health: a) Freedom from hunger, thirst and malnutrition; b) Freedom from fear and distress; c) Freedom from physical and thermal discomfort; d) Freedom from pain, injury and disease; and e) Freedom to express normal patterns of behaviour of farmed animals.		
3	7	1	Principle 3: Nature and the environment are protected	25. Natural ecosystems are restored as appropriate. Where the operations have caused adverse environmental impacts, the organisation shall implement measures to restore and rehabilitate forest or ecosystems that have been impacted negatively.	The Organisation shall analyse and evaluate the deforestation or ecosystem degradation impacts in areas affected by the operation, including the analysis and evaluation of current land uses and land tenure/ownership, and identification of affected stakeholders.		25. Natural ecosystem may be rehabilitated instead of restored. It may near to impossible to restore a natural ecosystem. 25.1. Too many conditions in one indicator. Suggest to break it into 2 or more different indicators.  •Criterion 25: To be aligned with AFI, restoration/rehabilitation is expected when the operations 'contributed to' and not just 'caused' the harm. •Criterion 25: It should be made clear that restoration cannot be considered as an offset for conversion. It would also help to define conversion as no gross conversion. •Criterion 25: While the level of detail regarding restoration/rehabilitation expectations is greater than what is in AFI (which in itself is good), it carries with it the concern that there is not enough detail to be considered comprehensive 'good practice' for restoration/rehabilitation. If companies only need to follow this criterion as a reference for implementing restoration/rehabilitation, then it falls considerably short in providing the key characteristics and considerations that should be used for effective restoration.
3	7	2	Principle 3: Nature and the environment are protected	25. Natural ecosystems are restored as appropriate. Where the operations have caused adverse environmental impacts, the organisation shall implement measures to restore and rehabilitate forest or ecosystems that have been impacted negatively.	Based on the consultation and evaluation the organisation shall select a suitable site or landscape for restoration.		25.2. How this is implementable is the company does not have a suitable site or landscape?
3	7	3	Principle 3: Nature and the environment are protected	25. Natural ecosystems are restored as appropriate. Where the operations have caused adverse environmental impacts, the organisation shall implement measures to restore and rehabilitate forest or ecosystems that have been impacted negatively.	The evaluation shall include engagement of stakeholders, to include considerations of long-term goals of forest restoration and include the interests of all stakeholder groups		
3	7	4	Principle 3: Nature and the environment are protected	25. Natural ecosystems are restored as appropriate. Where the operations have caused adverse environmental impacts, the organisation shall implement measures to restore and rehabilitate forest or ecosystems that have been impacted negatively.	The Organisation shall develop and implement a restoration management plan, including: preparing a topographic land-use map, including a designation of ecosystem functions and assessment of accessibility; existence of natural regeneration and needs for planting; agreeing on restoration/rehabilitation objectives; selecting the restoration/rehabilitation method; choosing the species to be used; establishing a nursery; and assessing possible positive and negative social and environmental impacts.		Indicator 25.4: Include language around undertaking a lit review and/or research on effective restoration methods given desired project outcomes prior to start of restoration work -
3	7	5	Principle 3: Nature and the environment are protected	25. Natural ecosystems are restored as appropriate. Where the operations have caused adverse environmental impacts, the organisation shall implement measures to restore and rehabilitate forest or ecosystems that have been impacted negatively.	The Organisation shall assess capacity-building needs and plan and implement the necessary training.		
3	7	6	Principle 3: Nature and the environment are protected	25. Natural ecosystems are restored as appropriate. Where the operations have caused adverse environmental impacts, the organisation shall implement measures to restore and rehabilitate forest or ecosystems that have been impacted negatively.	The Organisations shall establish realistic time schedules and plan for financial requirements.		

3	7	7	Principle 3: Nature and the environment are protected	25. Natural ecosystems are restored as appropriate. Where the operations have caused adverse environmental impacts, the organisation shall implement measures to restore and rehabilitate forest or ecosystems that have been impacted negatively.	The Organisation shall monitor restored/rehabilitated areas, and conduct maintenance activities as required		Indicator 25.7: Include language around the modification of future plans when monitoring results indicate the need
			P4 only				Some indicators for better clear difference between plantations and conserved forest should be added in term of climate change mitigation.  It's good to have this principal included, but these will be hard for any small organization to meet. They will need help (financial and oversight) from corporate customers, etc..  Another area where it is felt that more robust metrics and reporting frameworks are needed. Many countries have implemented the Taskforce for Climate Related Financial Disclosures - this is what should be recommended under the climate impacts are mitigated and minimised section, especially as this references climate mitigation and adaptation.
4	1	1	Principle 4: Climate impacts are minimised and mitigated.	26. Climate impacts are identified and quantified. The Organisation shall identify key emission sources that may lead to significant negative climate impacts and quantify the emissions, where feasible.	The Organization shall identify key emission sources, considering land-use change, and energy and materials use.		
4	1	2	Principle 4: Climate impacts are minimised and mitigated.	26. Climate impacts are identified and quantified. The Organisation shall identify key emission sources that may lead to significant negative climate impacts and quantify the emissions, where feasible.	At minimum, the most significant emissions shall be included, considering the scope of the organization's activities. The organization shall justify its inclusion or exclusion of the emission sources.		
4	1	3	Principle 4: Climate impacts are minimised and mitigated.	26. Climate impacts are identified and quantified. The Organisation shall identify key emission sources that may lead to significant negative climate impacts and quantify the emissions, where feasible.	The Organisation shall quantify its climate impacts, including GHG emissions, appropriate to the scale, intensity, and risk of its operations.		
4	1	4	Principle 4: Climate impacts are minimised and mitigated.	26. Climate impacts are identified and quantified. The Organisation shall identify key emission sources that may lead to significant negative climate impacts and quantify the emissions, where feasible.	Where such quantification cannot feasibly be performed, the Organisation shall describe and justify such exclusions.		Indicator 26.4: This seems like an "out" for organizations from thinking about climate impacts. Is there a way to reword this to set a minimum likely estimation that organizations can use as a benchmark against which to judge their progress?
4	2	1	Principle 4: Climate impacts are minimised and mitigated.	27. Steps are implemented for climate change mitigation. The Organization shall establish and implement a plan to minimize the negative climate impacts and evaluate the needs for climate change adaptation, depending on the risks.	The Organization shall undertake efforts to reduce negative climate impacts resulting from its activities.		
4	2	2	Principle 4: Climate impacts are minimised and mitigated.	27. Steps are implemented for climate change mitigation. The Organization shall establish and implement a plan to minimize the negative climate impacts and evaluate the needs for climate change adaptation, depending on the risks.	Targets shall be established with a focus on reducing negative climate impacts and reduction of GHG emissions for the key areas as identified by the Organization.		
4	2	3	Principle 4: Climate impacts are minimised and mitigated.	27. Steps are implemented for climate change mitigation. The Organization shall establish and implement a plan to minimize the negative climate impacts and evaluate the needs for climate change adaptation, depending on the risks.	The organization shall monitor the progress of achieving its climate change mitigation targets over time and shall implement adjustments when necessary.		
4	2	4	Principle 4: Climate impacts are minimised and mitigated.	27. Steps are implemented for climate change mitigation. The Organization shall establish and implement a plan to minimize the negative climate impacts and evaluate the needs for climate change adaptation, depending on the risks.	If offsetting is used, the Organisation shall identify and document any standards used to generate carbon offsets, and the amount of offset credits purchased and used.		Indicator 27.4: Include language here around organization's due diligence that the purchased offsets are widely considered to be legitimate



