

Benchmark of GlobalGAP

April 2008

Summary

In order to determine whether GlobalGAP meets the requirements of the RTFO "Qualifying Standard" a benchmark was performed. The benchmark assessed whether GlobalGAP complies with the demands for the RTFO Qualifying Standard.

Two aspects are of importance to determine the quality of a certification scheme and whether it meets the requirements:

- *The criteria and indicators of the sustainability standard;*
- *The auditing quality of the sustainability standard.*

The benchmark makes us believe that GlobalGAP does not meet the norm for a Qualifying Standard under the RTFO. The main reason for this is:

- *The standard does not sufficiently include social or environmental criteria.*

Background GlobalGAP

Since the beginning of 2008 the UK reporting scheme of the RTFO has been operational. The reporting scheme aims to make maximum use of existing voluntary agri-environmental and social accountability schemes. It encourages transport fuel suppliers to demonstrate that their biofuel feedstock is produced in accordance with the RTFO Sustainable Biofuel Meta-Standard through existing certification schemes.

Several sustainability certification schemes have been benchmarked to determine which schemes meet the demands of a "Qualifying Standard" for social and/or environmental criteria - representing an acceptable level of sustainability. During the first round of standard benchmarks for the RTFO, EurepGAP was benchmarked against the criteria of the RTFO Sustainable Biofuel Meta-Standard, although it was found not to meet the qualifying standard level. Since this time, the standard has been updated and renamed "GlobalGAP". It was felt appropriate to re-benchmark this new standard against the RTFO Sustainable Biofuel Meta-Standard to assess whether it would now meet the qualifying standard level.

Control points and compliance criteria in GlobalGAP (previously: EurepGAP) are provided for three levels: Farm Base (FM), Crop Base (CB) and Combined Crops (CC). All three levels of criteria have to be complied with and all levels are included in the

benchmark. For each of the points GlobalGAP divides Minor Musts, Major Musts and Recommendations.

Benchmark results

In general, GlobalGAP provides detailed criteria for a broad range of issues, but strict compliances are not always explicitly mentioned. Many of the criteria are recommendations and most of the social criteria are not included.

GlobalGAP states that legislation overrides the standard where relevant legislation is more demanding; any applicable legislation that is stricter than GlobalGAP must be complied with in the country where the producer is operating.

Criteria and indicators¹

The results of the benchmark of the criteria are presented below. Detailed results from the benchmark table can be found in Appendix C.

1. Carbon conservation (Not compliant)

The preservation of above and below ground carbon stocks is not mentioned throughout the text. Evidence of previous land use is required, but focuses on food safety risks by pollution or contamination.

2. Biodiversity conservation (Partly compliant)

General compliance is required with national and local legislations, so this included relevant biodiversity legislations. but the applicant is not explicitly requested to demonstrate this. A written action plan has to be available to enhance biodiversity at the farm (minor must). A base line audit is recommended to map biodiversity and to draw an action plan to conserve biodiversity.

3. Soil conservation (Compliant)

Soil conservation is well represented in the GlobalGAP standard. The availability of soil maps is recommended, as are techniques for maintaining soil structure and avoiding soil compaction. The prevention of soil erosion is a Minor Must. In addition, GlobalGAP requires records of fertiliser and pesticide application.

4. Sustainable water use (Compliant)

Requirements for sustainable water use are implemented in the standard. The producer needs to clarify its method of irrigation in light of water conservation (Minor Must), apply prediction methods, have a water management plan and show record

¹ For a description of the methodology, criteria and elements to be benchmarked, cf. Ecofys (2007) Sustainability reporting within the RTFO: Framework report.

keeping (all Recommendations). Furthermore water for irrigation should be abstracted from a sustainable source (Minor Must) and advice on this should have been sought (Minor Must).

5. Air quality (Partly compliant)

GlobalGAP focuses on waste and pollution management. Burning of waste has to be avoided (recommendation). The standard however does not attribute air quality in detail, although general compliance with legislations is required.

6. Workers' rights and relationships (Partly compliant)

GlobalGAP has included several social criteria, of which health & safety and subcontracting requirements are the most important. Contracts and child labour are not mentioned, neither is anything included on wages, discrimination and forced labour. However, it does pay attention to work relations (provision of information).

7. Land rights and community issues (Not compliant)

Land right issues and communication with local stakeholders is not being addressed at in the GlobalGAP standard.

Table 1: Benchmark results

	GlobalGAP
P1. Conserve carbon stocks	N
P2. Conserve biodiversity	P
P3. Soil conservation	Y
P4. Sustainable water use	Y
P5. Air quality	P
P6. Labour conditions	P
P7. Land rights and community relation	N

Audit Quality

The benchmark of audit quality has not been conducted at this point in time, as the standard does not yet meet the Qualifying Standard level for the RTFO, so will not be included as an Environmental or Social Qualifying Standard within the scheme at this point in time.

Conclusions and recommendations

Conclusions

GlobalGAP performs slightly better than the previous benchmark of EurepGAP, especially on biodiversity and subcontracting. The standards major improvement is the clear structuring of the criteria.

The results of this benchmark however suggest that GlobalGAP does *not* meet the criteria required to qualify as an Environmental or Social Qualifying Standard (see Appendix A for the norm for a qualifying standard).

While GlobalGAP does not meet the norm for an Environmental Qualifying Standard, it does come very close. GlobalGAP could be contacted to consider including an additional criteria on the prevention of deforestation after 2005 which would likely make it an Environmental QS as this would improve its scoring on both carbon stocks (principle 1) and biodiversity (principle 2). All other environmental principles are sufficiently complied with.

Recommendations

We recommend the RFA do *not* accept GlobalGAP as a Qualifying Standard, since its criteria do not sufficiently cover the required aspects of the RTFO Sustainable Biofuel Meta-standard criteria.

Appendix A The norm for Qualifying Standards

The following norms were used for the benchmarks.

To become a Qualifying Environmental Standard the following criteria requirements must be met:

- Full compliance with all criteria referring to compliance with national legislation (2.1, 3.1, 4.1, 5.1)
- On all principles one 'partial compliance' criterion is permitted per principle, with a maximum of three in total.

Full compliance with a criterion is only awarded if the RTFO criterion is met by a corresponding mandatory criterion in the benchmarked standard.

To become a Qualifying Social Standard the following criteria requirements must be met:

- Of the 11 minimum requirement criteria of principle 6, 7 must be fully complied with
- On principle 7 on land right issues and community relations, one partial compliance is permitted.

Full compliance with a criterion is only awarded if the RTFO criterion is met by a corresponding mandatory criterion in the benchmarked standard.

Appendix B Guidance on compliance with criteria

In the benchmark performed on the criteria and indicators of existing standards against the RTFO Sustainable Biofuel Meta-Standard criteria and indicators three scores have been assigned:

- Y: Yes the RTFO criterion and its indicators are sufficiently met by the benchmarked standard
- X: No the RTFO criterion and its indicators are not or insufficiently met by the benchmarked standard
- P: indicating that the RTFO criterion and its indicators are partially met by the benchmarked standard. There can be three reasons for this:
 - Of the various indicators for one criterion several are met and several are not met
 - The subject covered by a criterion is addressed but in a less stringent manner. For example, several standards state that destruction of primary forest is forbidden but do not give a reference year. As the reference year is considered important this leads to a partial compliance score "P"
 - The RTFO Meta-Standard indicators are fully met by the benchmarked standard but are not mandatory for certification.

All Ps and Xs form gap criteria. In order to be able to claim the full RTFO Sustainable Biofuel Meta-Standard, successful supplementary checks on all gap criteria of the Qualifying Standard are required.

Supplementary checks can also be used to comply with gap criteria between a non-qualifying benchmarked standard and the Qualifying Standard level, or indeed to comply with gap criteria between a non-Qualifying Standard and the full RTFO Sustainable Biofuel Meta-Standard level.

Appendix C Detailed benchmark of criteria

Table 2: Detailed results of benchmark environmental criteria GlobalGAP

Principles and Criteria		GlobalGAP
P 1. Carbon Conservation		
C 1.1 Preservation of above and below ground carbon stocks (reference date 01-11-2005).	X	
P2. Biodiversity conservation		
C 2.1 Compliance with national laws and regulations relevant to biomass production and the area where biomass production takes place.	✓	Any applicable legislation that is stricter than GlobalGAP must be complied with
C 2.2 No conversion of high biodiversity areas after 01-11-2005	X	
C 2.3 Identification and conservation of important biodiversity on and around the production unit.	P	AF5.1. Written action plan to enhance biodiversity on farm (minor must), other are recommendations
<i>Recommendations</i>		
2.4 Preservation and/or improvement of surrounding landscape		Note this criterion is substantially changed from when the original benchmark was carried out and is therefore blank.
P3. Soil conservation		
C 3.1 Compliance with national laws and regulations relevant to soil degradation and soil management.	✓	Any applicable legislation that is stricter than GlobalGAP must be complied with
C 3.2 Application of best practices to maintain and improve soil quality. o Erosion control o Soil nutrient balance o Soil organic matter o Prevention of salinisation o Soil structure	✓	CB 4, best practices are minor musts, others are recommendations
<i>Recommendations</i>		
C 3.2a Measurements	P	CB 4.1. soil maps, CB 5.3 records of fertiliser application, CB 8.2 pesticide application records
C 3.3 The use of agricultural by-products does not jeopardize the function of local uses of the by-products, soil organic matter or soil nutrients balance.	X	
P 4. Sustainable Water Use		
C 4.1 Compliance with national laws and regulations relevant to contamination and depletion of water sources.	✓	Any applicable legislation that is stricter than GlobalGAP must be complied with
C 4.2 Application of <i>best practices</i> to reduce water usage and to maintain and improve water quality.	✓	CB 6.1 methods for calculating water use (recommendation), justification of the method used (minor must); CB6.4 (minor musts)
<i>Recommendations</i>		
4.2 b Records	P	CB6.2.3. records are recommended
P5. Air quality		
C 5.1 Compliance with national laws and regulations relevant to air emissions and burning practices	✓	Any applicable legislation that is stricter than GlobalGAP must be complied with
C 5.2 No burning as part off land clearing or waste disposal	P	AF4.2.1. Avoid the use of landfill or burning (recommendation only)

Table 3: Detailed results of benchmark social criteria GlobalGAP

Principles and Criteria		GlobalGAP
P6. Workers rights and working relationships		
C 6.1 Compliance with national laws concerning working conditions and workers rights	✓	Any applicable legislation that is stricter than GlobalGAP must be complied with
C 6.2 Contracts	X	
C 6.3 Provision of information	P	AF 3.5.2 Only recommendation
C 6.4 Subcontracting	P	AF 3.6 (minor musts)
C 6.5 Freedom to associate and bargain	X	
C 6.6 Child labour	X	
C 6.7 Young workers (15-17)	X	
C 6.8 Health and Safety	✓	AF3.1; AF3.2 written risk assessment for health & safety working conditions & procedures (minor musts)
C 6.9 Wages	X	
C 6.10 Discrimination	X	
C 6.11 Forced labour	X	
<i>Recommendations</i>		
C 6.12 Working hours	X	
P 7 Land right issues and community relations		
C 7.1 Land right issues	X	
C 7.2 Consultation and communication local stakeholders	X	