

## **Benchmark of the Field Testing Version of the RoundTable on Responsible Soy (RTRS) Principles and Criteria**

### **November 2009**

### **Summary**

*The RoundTable on Responsible Soy (RTRS) published a Field Testing Version of their principles and criteria on 28 May 2009. For the period of a year, RTRS will gather feedback from producers to further improve the standard. A benchmark has been conducted to assess whether the relevant RTRS criteria comply with the requirements of the RTFO Qualifying Standard and also whether the criteria meet the full RTFO Biofuel Sustainability Meta-Standard level. Outcomes of the benchmark will be made available to RTRS as part of their feedback process. The RTRS may wish to take these comments into account to adapt the standard towards full compliance with the RTFO Biofuel Sustainability Meta-Standard.*

*Two aspects are of importance to determine the quality of a certification scheme and whether it meets the requirements of the RTFO Biofuel Sustainability Meta-Standard:*

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

*In the case of the RTRS Field Testing Version, only the criteria and indicators were benchmarked as no information on the auditing quality is yet available. After the field testing period has closed, a first version of the full RTRS Principles and Criteria will be published by the RTRS.*

*The benchmark concluded that the current RTRS Principles and Criteria meet the requirements of both the Environmental and Social Qualifying Standard level. Moreover, RTRS meets the full RTFO Social Meta-Standard level. Compared to our previous benchmark of the RTRS Draft Principles and Criteria, the standard only met the Social Qualifying Standard level. We recommend to the RTRS to further specify some of the environmental criteria in order to obtain full compliance with the RTFO Biofuel Sustainability Meta-Standard.*

*In our previous benchmark we recommended to the RFA to allow the Field Testing version (i.e. the current version) for use in the RTFO, provided that the standard reached the same or higher level of compliance as the draft principles and criteria. We therefore recommend to the RFA to replace the current temporary approach to allowing reporting on the Basel Criteria for Responsible Soy with the Field Testing Version of the RTRS.*

## Background to the RTFO and RTRS

### RTFO

The UK Carbon and Sustainability reporting scheme of the RTFO has been operational since April 2008. This 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 Biofuel Sustainability Meta-Standard through existing certification schemes.

Several sustainability certification schemes have been benchmarked against the RTFO Biofuel Sustainability Meta-Standard to determine which schemes meet the demands of a "Qualifying Standard" level for social and/or environmental criteria - representing an acceptable level of sustainability. Previously, a benchmark had been conducted on the Basel Criteria for Responsible Soy. The Basel criteria and indicators by themselves do not function as a certification scheme, but reporting on a successful audit against the criteria and indicators is temporarily allowed as a Qualifying Standard under the RTFO<sup>1</sup>. The RTRS aims to operate as a certification scheme in due course and thereby would replace the temporary solution under the RTFO based on the Basel Criteria.

### RTRS development process

The RTRS Development Group published Draft Principles and Criteria on 15 November 2008 after having received feedback during two prior public consultation periods. This third and final public consultation document was open for comments until 15 January 2009. The principles and criteria were adapted in a Field Testing Version, which became available on 28 May 2009 to allow soy producers to test the implementation of requirements and to comment on their findings. Following this, any further required revisions will be made before publishing the first version of the full RTRS Principles and Criteria.

The RTRS Principles and Criteria have been benchmarked in two stages: in December 2008 a benchmark was conducted on the draft principles and criteria and the current benchmark (October 2009) covers the Field Testing Version of the RTRS. In general, the Field Testing Version includes further guidance on the criteria and some additional criteria.

---

<sup>1</sup> See RFA (2008), Technical Guidance on Carbon and Sustainability Reporting Within the Renewable Transport Fuel Obligation, Annex A. Available from: [www.renewablefuelsagency.org/](http://www.renewablefuelsagency.org/)

### RTRS sustainability principles

The RTRS standard distinguishes five principles and contains criteria, indicators and guidance for producers and verifiers. The five principles are:

- 1 Legal compliance and good business practice (3 criteria, 4 indicators)
- 2 Responsible labour conditions (5 criteria, 32 indicators)
- 3 Responsible community relations (4 criteria, 11 indicators)
- 4 Environmental responsibility (4 criteria, 12 indicators)
- 5 Good agricultural practice (11 criteria, 32 indicators)

### Benchmark results

The Principles and Criteria of the RTRS Field Testing Version were benchmarked against the requirements of the RTFO Qualifying Standard and RTFO Biofuel Sustainability Meta-Standard according to the rules outlined in Appendices A and B.

### Criteria and indicators<sup>2</sup>

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

Table 1: Benchmark results

Principle	RTRS
	Field Testing Version
P1. Conserve carbon stocks	P
P2. Conserve biodiversity	Y
P3. Soil conservation	Y
P4. Sustainable water use	Y
P5. Air quality	Y
P6. Labour conditions	Y
P7. Land right and community relations	Y

<sup>2</sup> For a description of the methodology, criteria and elements to be benchmarked, cf. Ecofys (2008) Sustainability reporting within the RTFO: Framework report. Available from: [www.renewablefuelsagency.org/](http://www.renewablefuelsagency.org/)

RTRS meets the RTFO criteria for six out of seven principles. Only the conservation of carbon stock is partially represented in the standard. The standard covers both environmental and social criteria from the RTFO very well. In particular, labour conditions are covered comprehensively, as well as biodiversity and sustainable water use.

To enable the RTRS to fully comply with the RTFO Biofuel Sustainability Meta-Standard, some additions would need to be made to the criteria that relate to the following RTFO criteria<sup>3</sup>:

- 1.1: Preservation of above and below ground carbon stocks.
- 2.2: Cut-off date for land clearance to be amended from May 2009 to January 2008.
- 3.3 (recommendation only): Negative effects from the use of agricultural by-products are avoided.
- 5.2: No burning as part of land clearance (only burning of crop residues and waste are covered).

Recommendations on how to achieve full compliance are presented in the last section of this document.

*Compared to our previous benchmark of the Draft Principles and Criteria we observe that criteria related to the following RTFO criteria have been changed:*

- The recommended RTFO criterion 2.4 (landscape) is now fully met.
- Social criteria, 6.2 (contracts) and 6.4 (sub-contracting), have been extended and are now fully compliant.

## **Audit Quality**

Audit quality has not been benchmarked at this stage as the RTRS has not yet released details alongside the Field Testing Version of the standard.

## **Conclusions and recommendations**

### **Conclusions**

As the RTRS is currently still a standard under development, conclusions only cover the extent to which the principles, criteria and indicators of the *Field Testing Version*

---

<sup>3</sup> Note that the recommended RTFO criteria that are partially covered in the current version of the RTRS would not preclude the standard from meeting the RTFO Biofuel Sustainability Meta-Standard level.

cover the requirements of the RTFO Qualifying Standard and the RTFO Biofuel Sustainability Meta-Standard.

*This benchmark concluded that the principles, criteria and indicators as published by the RTRS currently meet the Environmental and Social Qualifying Standard level of the RTFO. Moreover, RTRS meets the RTFO Social Meta-Standard level. However, further guidance is necessary on audit quality before the standard can be fully accepted. The standard could potentially cover the full RTFO Biofuel Sustainability Meta-Standard if a few environmental criteria are further specified, or are added to the standard.*

## Recommendations

### For the RFA

We recommend to the RFA to accept the Field Testing Version of the RTRS as a temporary solution. By the middle of 2010, we can expect a fully operational RTRS standard. When the RTRS Field Testing Version is accepted as a temporary solution in the RTFO, the Basel Criteria can be phased out as these are not expected to develop to an operational certification scheme, whereas RTRS is.

### For the RTRS

Although the RTRS criteria cover nearly all RTFO criteria, and RTRS already meets the level for an Environmental and Social Qualifying Standard, the inclusion of the following recommendations would enable RTRS to meet the full RTFO Biofuel Sustainability Meta-Standard. Note that the recommended RTFO criteria that are partially covered in the current version of the RTRS would not preclude the standard from meeting the RTFO Biofuel Sustainability Meta-Standard level.

- RTFO: 1.1, 2.2: Reference date for land conversion of May 2009 needs to be amended in the final standard. Otherwise it will not comply with the EU Renewable Energy Directive (RED).
- RTFO: 1.1: Include criteria on preservation of above and below ground carbon stocks: for biodiversity this is satisfactorily covered, and dates are included, but a clear reference to carbon stocks is needed to comply with RTFO criterion 1.1.
- RTFO 3.3: Negative effects from the use of agricultural by-products are avoided (recommendation): it needs to be specified whether this is applicable for soy cultivation.
- RTFO 5.2: No burning as part of land clearing or waste disposal: although this is covered well for the burning of waste and co-products, a reference should also be made to burning as part of land clearance. Prescribing an impact assessment does not include the avoidance of land clearance by burning per se.

In addition, we recommend that the RTRS fully specifies its auditing process in the next version of the standard.

## References

RTRS (2008) *Draft RTRS Principles and Criteria: Third Public Consultation Document*. Document reference: DG4-OUT-02-ENG Draft RTRS Principles and Criteria for Consultation, 23 October 2008.

RTRS (2008) *RTRS Principles and Criteria for Responsible Soy: Field Testing Version*. Document reference: GA-OUT-01.2-ENG RTRS Principles and Criteria Field Testing Version, 28 May 2009.

RTRS website: [www.responsiblesoy.org](http://www.responsiblesoy.org), consulted November 2008 and October 2009.

RTFO (2008), Carbon and Sustainability reporting within the RTFO, available at [www.renewablefuelsagency.org/](http://www.renewablefuelsagency.org/)

Ecofys (2008), Framework report, available at [www.renewablefuelsagency.org/](http://www.renewablefuelsagency.org/)

## 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.

To achieve the level of the Environmental RTFO Biofuel Sustainability Meta-Standard, all environmental minimum requirement criteria must be complied with.

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.

To achieve the level of the Social RTFO Biofuel Sustainability Meta-Standard, all social minimum requirement criteria must be complied with.

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 Biofuel Sustainability 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 Biofuel Sustainability 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 Biofuel Sustainability Meta-Standard level.

## Appendix C Detailed benchmark of criteria

**Table 2: Detailed benchmark results of the RTRS environmental criteria**

Principles and Criteria		RTRS
<b>P 1. Carbon conservation</b>		
C 1.1 Preservation of above and below ground carbon stocks (reference date 01-11-2005)	P	4.3.1 GHG emissions should be monitored, LUC is not (yet) included 4.4.1 Cut-off date is May 2009 But makes no reference to carbon stocks as such
<b>P 2. Biodiversity conservation</b>		
C 2.1 Compliance with national laws and regulations relevant to biomass production and the area where biomass production takes place	Y	1.1: 1.1.1 - 1.1.2
C 2.2 No conversion of high biodiversity areas after 01-11-2005	P	4.4.1 Cut-off date is May 2009
C 2.3 Identification and conservation of important biodiversity on and around the production unit	Y	4.1: 4.1.1- 4.1.4
<i>Recommendations</i>		
2.4 Preservation and/or improvement of surrounding landscape	Y	3.2 (landscape is part of community rights assessment) 4.1: 4.1.1 - 4.1.4 4.4.1
<b>P 3. Soil conservation</b>		
C 3.1 Compliance with national laws and regulations relevant to soil degradation and soil management	Y	1.1: 1.1.1 - 1.1.2 5.6
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	Y	5.3: 5.3.1- 5.3.3
<i>Recommendations</i>		
3.2 a Records		
C 3.3 The use of agricultural by-products does not jeopardise the function of local uses of the by-products, soil organic matter or soil nutrients balance	P	4.2.1 No burning of crop residues is allowed, however the use of crop residues and co-products is not mentioned
<b>P 4. Sustainable water Use</b>		
C 4.1 Compliance with national laws and regulations relevant to contamination and depletion of water sources	Y	1.1: 1.1.1 - 1.1.2
C 4.2 Application of <i>best practices</i> to reduce water usage and to maintain and improve water quality	Y	5.1: 5.1.1- 5.1.4 5.2: 5.2.1- 5.2.4
<i>Recommendations</i>		
4.2 b Records	Y	5.1: 5.1.1- 5.1.4 5.2: 5.2.1- 5.2.4
<b>P 5. Air quality</b>		
C 5.1 Compliance with national laws and regulations relevant to air emissions and burning practices	Y	1.1: 1.1.1 - 1.1.2

C 5.2 No burning as part of land clearing or waste disposal	P	4.2.1 (no burning of crop residues/waste) - Burning for land clearing is not mentioned
---	---	---

**Table 3: Detailed benchmark results of the RTRS social criteria**

Principles and Criteria		RTRS
<b>P 6. Workers rights and working relationships</b>		
C 6.1 Compliance with national laws concerning working conditions and workers rights	Y	1.1: 1.1.1 - 1.1.2
C 6.2 Contracts	Y	2.2.1
C 6.3 Provision of information	Y	2.2: 2.2.1 - 2.2.3
C 6.4 Subcontracting	Y	2.1: General guidance applies to all types of workers 2.2: 2.2.1 2.3: 2.3.1 2.4: 2.4.1 - 2.4.3
C 6.5 Freedom to associate and bargain	Y	2.4: 2.4.1- 2.4.4
C 6.6 Child labour	Y	2.1: 2.1.4 - 2.1.5
C 6.7 Young workers (15-17)	Y	2.1: 2.1.4 - 2.1.5
C 6.8 Health and Safety	Y	2.3: 2.3.1 - 2.3.8
C 6.9 Wages	Y	2.1.7 2.5: 2.5.1- 2.5.2
C 6.10 Discrimination	Y	2.1: 2.1.6 - 2.1.8
C 6.11 Forced labour	Y	2.1: 2.1.1 - 2.1.3
<i>Recommendations</i>		
C 6.12 Working hours	Y	2.5.3 - 2.5.6
<b>P 7. Land right issues and community relations</b>		
C 7.1 Land right issues	Y	1.2.1 4.4
C 7.2 Consultation and communication local stakeholders	Y	3.1: 3.1.1 - 3.1.3 3.2: 3.2.1 - 3.2.2 3.3: 3.3.1 - 3.3.3