



**Rainforest Alliance
Sustainable Agriculture
Sustainable Sourcing Policy:
Secondary Ingredients**

Rainforest Alliance Sustainable Agriculture Sustainable Sourcing Policy: Secondary Ingredients

“Some composite products that qualify for using the seal because the core ingredient (such as cocoa in chocolate) is from certified farms may also contain other ingredients from farms (such as palm oil in chocolate) whose production is associated with serious environmental impacts. In such cases, the Rainforest Alliance will require a risk assessment for these ingredients before the use of the Rainforest Alliance Certified™ seal is granted on these products. If the level of risk is considered to be high, manufacturers must develop a sustainable sourcing plan for these ingredients, increasingly acquiring them from certified or responsibly managed sources when they are available in the quantities, qualities and forms necessary.”

What crops are “associated with serious environmental impacts”?

All agricultural crops, especially in the tropics where biodiversity is concentrated in rainforests and other endangered ecosystems, have environmental impacts. However, many secondary ingredients are grown on a small scale in traditional ways and are relatively benign. This policy is rather intended to address tropical commodities grown on a large scale in monocultures, such as palm oil, soy and sugar, when they are used as secondary ingredients in significant quantities. The seriousness of environmental risks will be evaluated by the Rainforest Alliance against the critical criteria in the Sustainable Agriculture Network (SAN) standard. See these criteria in the appendix.

Who decides if a risk assessment is required?

Manufacturers of the final product bearing the Rainforest Alliance Certified™ seal should proactively initiate risk assessments for all secondary ingredients in the product. The Rainforest Alliance will ask for an assessment to be undertaken for those ingredients whose production is associated with serious environmental impacts as described above.

Who may conduct the assessment?

Any qualified person or organization. Once the origin of ingredients is known, most initial assessments can be done by telephone and Internet. If the preliminary evaluation suggests that field research is warranted, the Rainforest Alliance and other SAN members can recommend consultants to do this work.

What should the assessment include?

The assessment should include enough information to evaluate whether or not the production of the ingredient is in widespread and systemic noncompliance with one or more of the SAN critical criteria.

Must assessments be submitted to the Rainforest Alliance in order to receive approval to use the Rainforest Alliance Certified™ seal on the product?

Only when the assessments have been conducted at the request of the Rainforest Alliance or another SAN member.

How are assessments evaluated?

The manufacturer should evaluate its own assessments against the SAN critical criteria. If the Rainforest Alliance requests an assessment, or if the manufacturer asks the Rainforest Alliance to evaluate an assessment, the Rainforest Alliance will do so against the SAN critical criteria and also consider scale and origin.

How often should assessments be conducted?

Manufacturers are encouraged to review their ingredients and suppliers annually.

If a sustainable sourcing plan is required, what should it include?

Sustainable sourcing plans should include information about supply chains and origins, the strategy for addressing risks at the key origins, and a timeline. Certification by credible programs managed by ISEAL members is one way to address risks, but there are other ways and certification is not required by this policy. Many farm-product exporters, importers and buyers have their own risk assurance policies and criteria, and these are often sufficient. It is preferred but not required that these secondary ingredients come from Rainforest Alliance Certified™ farms.

How much time does a sustainable sourcing plan allow to correct the problems?

The Rainforest Alliance knows that the challenges at origin are often complex, entrenched and intimidating. At the same time, the Rainforest Alliance and collaborating farmers and food companies have overcome problems once seen as intractable with combinations of patience, persistence and innovation. Sufficient time will be allowed so long as there is commitment and continual progress. The requirements of a sustainable sourcing plan should not cause interruptions in supply, changes in quality, or costs that threaten the economic viability of the enterprise.

Supply chain information is often very sensitive; how do we know that it will be kept confidential?

All risk assessments and sustainable sourcing plans will be kept confidential unless released by the manufacturer. In some cases, public summaries will be required or desired, and these will be prepared by the manufacturers.

APPENDIX – SAN CRITICAL CRITERIA

1.10 *Critical Criterion.* The farm must have a system for avoiding the mixing of certified products with non-certified products in its facilities, including harvesting, handling, processing and packaging of products, as well as transportation. All transactions involving certified products must be recorded. Products leaving the farm must be duly identified and accompanied with the relevant documentation indicating a certified farm as origin.

2.1 *Critical Criterion.* All existing natural ecosystems, both aquatic and terrestrial, must be identified, protected and restored through a conservation program. The program must include the restoration of natural ecosystems or the reforestation of areas within the farm that are unsuitable for agriculture.

2.2 *Critical Criterion.* The farm must maintain the integrity of aquatic or terrestrial ecosystems inside and outside of the farm, and must not permit their destruction or alteration as a result of management or production activities on the farm.

3.3 *Critical Criterion.* Hunting, capturing, extracting and trafficking wild animals must be prohibited on the farm. Cultural or ethnic groups are allowed to hunt or collect fauna in a controlled manner and in areas designated for those purposes under the following conditions:

- a. The activities do not involve species in danger of or threatened with extinction.
- b. There are established laws that recognize the rights of these groups to hunt or collect wildlife.
- c. Hunting and collection activities do not have negative impacts on the ecological processes or functions important for agricultural and local ecosystem sustainability.
- d. The long-term viability of the species' populations is not affected.
- e. These activities are not for commercial purposes.

4.5 *Critical Criterion.* The farm must not discharge or deposit industrial or domestic wastewater into natural water bodies without demonstrating that the discharged water complies with the respective legal requirements, and that the wastewater's physical and biochemical characteristics do not degrade the receiving water body. If legal requirements do not exist, the discharged wastewater must comply with the following minimum parameters:

Water Quality Parameter	Value
Biochemical Oxygen Demand (DBO _{5, 20'})	Less than 50 mg/L
Total suspended solids	
pH	Between 6.0 – 9.0
Grease and oils	Less than 30 mg/L
Fecal coliforms	Absent

The mixing of wastewater with uncontaminated water for discharge into the environment is prohibited.

4.7 *Critical Criterion.* The farm must not deposit into natural water bodies any organic or inorganic solids, such as domestic or industrial waste, rejected products,

construction debris or rubble, soil and stones from excavations, rubbish from cleaning land, or other materials.

5.2 *Critical Criterion.* The farm must not discriminate in its labor and hiring policies and procedures along the lines of race, color, gender, age, religion, social class, political tendencies, nationality, syndicate membership, sexual orientation, civil status or any other motive as indicated by applicable laws, ILO Conventions 100 and 111, and this standard. The farm must offer equal pay, training and promotion opportunities and benefits to all workers for the same type of work. The farm must not influence the political, religious, social or cultural convictions of workers.

5.5 *Critical Criterion.* Workers must receive pay in legal tender greater than or equal to the regional average or the legally established minimum wage, whichever is greater, according to their specific job. In cases where the salary is negotiated through collective bargaining or other pact, the worker must have access to a copy of this document during the hiring process. For production, quota or piecework, the established pay rate must allow workers to earn a minimum wage based on an eight-hour workday under average working conditions, or in cases where these conditions cannot be met.

5.8 *Critical Criterion.* It is prohibited to directly or indirectly employ full- or part-time workers under the age of 15. In countries where the ILO Conventions have been ratified, the farm must adhere to Convention 138, Recommendation 146 (minimum age). Farms contracting minors between the ages of 15 and 17 must keep a record of the following information for each minor:

- a. First and last name.
- b. Date of birth (day, month and year).
- c. First and last name of parents or legal guardian.
- d. Place of origin and permanent residence.
- e. Type of work carried out on the farm.
- f. Number of hours assigned and worked.
- g. Salary received.
- h. Written authorization for employment signed by parents or legal guardian.

Workers between 15 and 17 years old must not work more than eight hours per day or more than 42 hours per week. Their work schedule must not interfere with educational opportunities. These workers must not be assigned activities that could put their health at risk, such as the handling and application of agrochemicals or activities that require strong physical exertion.

5.10 *Critical Criterion.* Any type of forced labor is prohibited, including working under the regimen of imprisonment, in agreement with International Labor Organization (ILO) Conventions 29 and 105 and national labor laws. The farm does not withhold any part or all of workers' salaries, benefits or any rights acquired or stipulated by law, or any of the workers' documents, in order to force them to work or stay on the farm, or as a disciplinary action. The farm does not use extortion, debt, threats or sexual abuse or harassment, or any other physical or psychological measure to force workers to work or stay on the farm, or as a disciplinary measure.

6.13 *Critical Criterion.* All workers that come into contact with agrochemicals, including those who clean or wash clothes or equipment that has been exposed to agrochemicals, must use personal protection equipment. The farm must provide this equipment in good condition, and must provide incentives to workers to use the equipment. The equipment must reduce contact with the agrochemicals and the possibility of acute or chronic poisoning, and must comply with the strictest of the following requirements: a) the requirements indicated on the products' Material Safety Data Sheet, b) any applicable laws; or c) the equipment indicated in Annex 2 of this standard.

8.4 *Critical Criterion.* The following chemical or biological substances cannot be used on certified farms:

- a. Biological or organic substances that are not legally registered in the country for commercial use.
- b. Agrochemicals that are not registered officially in the country.
- c. Agrochemicals that are mentioned in the List of Banned and Severely Restricted Pesticides in the U.S. by its Environmental Protection Agency (EPA) or pesticides banned or severely restricted in the European Union.
- d. Substances that have been banned globally under the Stockholm Convention on Persistent Organic Pollutants (POPs).
- e. Substances listed in Annex III of the Rotterdam Convention on Prior Informed Consent (PIC), in relation to national bans or severe restrictions for documented health or environmental reasons in at least two regions of the World.
- f. All Pesticide Action Network Dirty Dozen substances.

List of Prohibited Pesticides – Sustainable Agriculture Network is binding for the inserts 8.4.c, 8.4.d, 8.4.e and 8.4.f of this criterion.

8.6 *Critical Criterion.* The farm must take steps to avoid introducing, cultivating or processing transgenic crops. When nearby transgenic materials are accidentally introduced into a certified farm's crop, the farm must develop and execute a plan to isolate the crops and provide follow-up in order to comply with the requirements of this criterion.

9.5 *Critical Criterion.* New production areas must only be located on land with the climatic, soil and topographic conditions suitable for intensity level of the agricultural production planned. The establishment of new production areas must be based on land use capacity studies that demonstrate long-term production capacity. The cutting of natural forest cover or burning to prepare new production areas is not permitted.

ADDITIONAL CRITICAL CRITERIA FOR PALM, SOY, SUGARCANE, PEANUTS & SUNFLOWERS:

2.2 *Critical Criterion.* From the date of application for certification onwards, the farm must not destroy any natural ecosystem. Additionally, from November 1, 2005 onwards no high value ecosystems must have been destroyed by or due to purposeful farm management activities. If any natural ecosystems have been

destroyed by or due to purposeful farm management activities between November 1, 1999 and November 1, 2005, the farm must implement the following analysis and mitigations:

- a. Conduct an analysis of the ecosystem destruction to document the scope and ecological impact of the destruction.
- b. Develop a mitigation plan with advice from a competent professional that is consistent with applicable legislation and that compensates for the negative impact.
- c. Implement the activities of this mitigation plan, including for example the set aside of a significant percentage of the farm area for conservation purposes.

Note: This criterion's content has been changed for the SAN Addendum and applies substituting the Sustainable Agriculture Standard's criterion 2.2.

7.2 Critical Criterion. The farm management must implement policies and procedures for identifying and considering the interests of local populations and community interest groups regarding farm activities or changes that could have an impact on their health, employment or local natural resources. The farm must document and make available for public view all complaints and comments it receives related to its activities and its replies to them.

Note: This criterion's content and category have been changed for the SAN Addendum and applies substituting the Sustainable Agriculture Standard's criterion 7.2.

8.8 Critical Criterion. APPLIES FOR SUGAR CANE CULTIVATION ONLY Farms that harvest sugarcane with machines are not allowed to use fire for harvest preparation. All other farms – employing manual rather than mechanized harvesting - must eliminate fire for harvest preparation within a maximum period of three years and must implement the following rules:

- a. Explain their fire-elimination plan to workers, suppliers and surrounding communities.
- b. Comply with local legislation about the use of fire for farm management.
- c. Conduct burning in a way that minimizes the impact on workers, surrounding communities and natural resources.

Fire must not be allowed to spread to conservation areas. The workers in charge of burning must be adequately trained in fire management, control and suppression.