

# Standards & Policy Development Handbook

## Sustainable Agriculture Network

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Sustainable Agriculture Network (SAN):

Conservación y Desarrollo (C&D), Ecuador · Fundación Interamericana de Investigación Tropical (FIIT),  
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## 1. General Considerations

This handbook lays the foundations that enable the Sustainable Agriculture Network (SAN) to:

- Create and update international standards as the basis for certification of sustainable practices on agricultural and livestock farms in tropical regions.
- Provide guidance in implementing these standards at the local level.

The handbook outlines the procedures and people responsible for developing SAN binding standards and policy documents. It is binding to all involved stakeholders. This handbook contents complies with the ISEAL Alliance *Code of Good Practice for Setting Social and Environmental Standards*. The Sustainable Agriculture Network is a member of the ISEAL Alliance. As SAN representative at ISEAL Alliance, Rainforest Alliance makes the commitment of complying with the code.

This version of the *Sustainable Agriculture Network's Standards & Policy Development Handbook* shall come into force on and after SAN directors' approval, and shall be posted on the Rainforest Alliance's Agriculture standards webpage.

### 1.1 Sustainable Agriculture Network Objectives on Standards Development

The Sustainable Agriculture Network (SAN) is a coalition of independent non-profit conservation organizations that promote the social and environmental sustainability of agricultural activities by developing standards. A Certification Body certifies farms that comply with SAN's standards. Each inspection body - authorized by a Certification Body - provides audit services for farmers and agricultural companies in their respective countries. SAN members also offer their knowledge and experience in working towards the development of the Sustainable Agriculture Standard. Rainforest Alliance currently holds the Secretariat for the Sustainable Agriculture Network and coordinates the development and review of standards and related policies for the SAN. Rainforest Alliance also administers the *Rainforest Alliance Certified*<sup>TM</sup> trademark.

The Sustainable Agriculture Network (SAN) promotes efficient agriculture, biodiversity conservation and sustainable community development by creating social and environmental standards. SAN fosters best management practices across agricultural value chains by encouraging farmers to comply with SAN standards and by motivating traders and consumers to support sustainability.

SAN pursues its mission by:

- Integrating sustainable production of crops and livestock into local and regional strategies that favor biodiversity conservation and safeguard social and environmental well-being.
- Raising awareness among farmers, traders, consumers and business leaders about the interdependencies among healthy ecosystems, sustainable agriculture and social responsibility.
- Impressing upon business leaders and consumers the importance of choosing products grown on environmentally sustainable and socially responsible farms.
- Stimulating dialog among environmental, social and economic groups, North and South, about the benefits of sustainable agriculture.

### 1.2 Scope of SAN's International Standard

The Sustainable Agriculture Standard is a key element in implementing SAN's strategy. This standard shall provide an international framework for certification of best agricultural practices on farms. This

Standard can be used to assess the management of farms of any size growing agricultural products defined in SAN Farm Certification Policy.

The scope of SAN's Sustainable Agriculture Standard covers management on farms of all sizes, including agricultural, social, legal, labor, environmental, community relations, and occupational health and safety issues. Farm's compliance with the standard is assessed by observing agricultural and labor practices, evaluating existing infrastructure, and interviewing farm workers and managers or administrators.

Specific objectives of Sustainable Agriculture Network's standards and policy documents are:

- Improving farm management efficiency through criteria that encourage good organization and planning, in order to implement best practices, analyze and abate problems, and monitor progress.
- Promoting higher farm competitiveness through increased production, better product quality, and higher farm worker efficiency.
- Enhancing wildlife habitat quality by means of halting deforestation, preserving riparian forests and other areas that protect such critical ecosystems as wetlands and forest patches in farms and their areas of influence, as well as reforestation with native species.
- Decreasing water pollution by controlling the sources of agriculture-related pollutants (pesticides and fertilizers, sediments, wastewater, solid waste, fuel, and other toxic substances).
- Encouraging a rational use of water resources in packing and processing plants, housing, and irrigation stations.
- Stimulating farm workers' motivation providing them with fair wages, decent housing, drinking water, safe infrastructure, and clean sanitary facilities.
- Making sure that farm workers and their families have access to schools, health care centers, transportation, and continuous training.
- Improving relationships between farms and neighboring communities.
- Mitigating activity-related environmental and human health hazards through a ban on hazardous agrochemicals, as well as a strict control and phase-out of agrochemical uses, in general, with an eye to eliminating their use in the long term.
- Reducing soil erosion through conservation practices, such as contour planting and crop cover.
- Decreasing farm waste by means of composting organic waste to be used as fertilizer, as well as rejecting, reducing, recycling, or properly disposing of other waste, such as plastic, glass, paper, metal, and others.

### **1.3 Valid SAN Standards & Policy Documents**

The following standards & policy documents are binding for farms and groups subject to certification audits:

- Sustainable Agriculture Standard
- SAN Addendum – Additional SAN criteria for oilpalm, sugarcane, soy, peanut and sunflower farms
- List of Prohibited Pesticides
- Farm Certification Policy
- Group Certification Standard
- Requirements for Chain of Custody Approval
- *Rainforest Alliance Certified™ - Use of Seal Guidelines*

#### 1.4 Approval of the Standards & Policy Development Handbook

- The directors of the Sustainable Agriculture Network (SAN-BD) approved this version of the *Sustainable Agriculture Network's Standards and Policy Development Handbook* during their March 3, 2009 meeting.

#### 1.5 Revision of SAN's Standards & Policy Development Handbook

- The SAN-BD defines the criteria and periodicity for revising the *Sustainable Agriculture Network's Standards & Policy Development Handbook*.
- To this end, the SAN-BD shall consider the SAN Secretariat report on complaints about standards & policy development filed through the template posted on the relevant webpage.

#### 1.6 Main Stakeholders in Standards & Policy Development Infrastructure

The main functions performed by the different stakeholders involved in developing SAN's standards & policy documents are outlined below. Interrelationships among these stakeholders are illustrated in Annex 1:

- **Sustainable Agriculture Network (SAN):** A network of organizations supporting the objectives mentioned in this handbook and contributing to their compliance.
- **SAN Member:** An organization that has signed a membership agreement with SAN.
- **SAN Board of Directors (SAN-BD):** Currently made up of all SAN members' directors. If SAN has over 12 members, SAN's General Assembly shall elect the SAN Board of Directors members. The SAN-BD oversees and approves the development of strategies, policies, standards, additional criteria, interpretation guidelines, and other documents supporting SAN's mission.
- **SAN General Assembly:** Functions from the moment on when the SAN will have more than 12 members. It is composed by one official representative of all SAN members.
- **Sustainable Agriculture Network Secretariat (SAN Secretariat):** A SAN-BD-approved SAN member acting as SAN's International Secretariat in regards to standards and policy development, as well as coordinator of related processes. Its role is to ensure proper implementation of policies and strategies defined by SAN. It provides technical and administrative support to the SAN Board of Directors, coordinates the International Standards Committee, gives maintenance to the respective webpage, publishes related documentation every six months (an updated list of standards & policy documents in public consultation), organizes international meetings, helps coordinate workgroups, oversees the development of interpretation guidelines led by SAN representatives and related policies, develops financing proposals on behalf of SAN, and owns the intellectual property related to SAN standards & policy documents. It also manages policies governing the certification system. SAN Secretariat headquarters are located in a tropical country.
- **SAN's International Standards Committee (ISC):** This committee is an international expert group that assesses SAN standard development processes. It is established and coordinated by the SAN Secretariat. It is responsible for developing or revising the contents of specific SAN international standards or additional criteria for new crops.
- **Workgroup (WG):** A technical group created by the SAN Secretariat and approved by ISC to provide mostly technical inputs in developing or applying SAN policy documents and related policies. The Workgroup concept is flexible, following ISC-defined requirements. The main role played by workgroups consists of developing local indicator interpretation guidelines in coordination with the SAN Secretariat, and under the leadership of a SAN representative. These guidelines interpret the International Standard in the case of specific crops and specific regions.

The ISC can also summon workgroups to get their support on particular issues around developing policy documents and related policies.

- **International Stakeholder Forum (ISF):** Multiple stakeholders interested in SAN's mission and contributing to standards and additional criteria development largely through e-mails. They can be external stakeholders or SAN members. They widely review and comment on SAN policy document drafts.
- **Certification Body:** Unit that decides about the authorization, suspension or cancellation of a *Rainforest Alliance Certified™* farm or group certification. The Certification Body subcontracts inspection bodies and controls the quality of their functions.
- **Inspection body:** Unit that conducts *Rainforest Alliance Certified™* certification audits for farms and groups. An Inspection Body must comply with the sub-contract conditions defined by the Certification Body.

### 1.7 Main Outcomes of SAN's Standards & Policy Development

The table below describes the contents of SAN's standards & policy documents, as well as stakeholders involved in their development:

Document	Description	Stakeholders
<b>Sustainable Agriculture Standard</b>	<ul style="list-style-type: none"> <li>• Consists of SAN sustainable agriculture principles and criteria applied at the international level.</li> <li>• Principles without specifications. They cluster criteria.</li> <li>• Criteria are the binding requirements for farms within SAN standards. Some of them are critical. During auditing processes, criteria underlie farm assessment in authorized regions that produce crops covered by SAN's standards documents.</li> </ul>	<ul style="list-style-type: none"> <li>• Its development is coordinated by the SAN Secretariat.</li> <li>• The SAN Secretariat drafts the Terms of Reference (ToR) for developing standards.</li> <li>• These ToR are approved by the ISC and developed with WG support.</li> <li>• Its contents (in both draft and final versions) are approved by the ISC.</li> <li>• It gets feedback from stakeholders during public consultation.</li> <li>• Development process approved by SAN-BD.</li> </ul>
<b>Additional Criteria</b>	<ul style="list-style-type: none"> <li>• For new crops requiring the creation of agricultural, social, or environmental criteria not covered by the International Standard.</li> <li>• They arise when the International Standard is applied to new crops. During this process, the WG designated by the SAN Secretariat is able to identify significant issues not covered by current standards &amp; policy documents.</li> <li>• Additional Criteria are binding and of an international nature for a specific crop and shall be included in the International Standard's future version.</li> </ul>	<ul style="list-style-type: none"> <li>• Their development is coordinated by the SAN Secretariat.</li> <li>• The SAN Secretariat drafts the ToR for developing criteria.</li> <li>• These ToR are approved by the ISC and developed with WG support.</li> <li>• Their contents (in both draft and final versions) are approved by the ISC.</li> <li>• They get feedback from stakeholders during public consultation.</li> <li>• Development process approved by SAN-BD.</li> </ul>

Document	Description	Stakeholders
<b>Interpretation Guidelines (Local Indicators)</b>	<ul style="list-style-type: none"> <li>Consisting of country- and crop-specific indicators.</li> <li>They are not binding. Complying with them is not mandatory.</li> <li>They interpret the standard for local conditions or for a specific crop.</li> <li>They are a producer's guide in implementing the standard and provide orientation to local auditors.</li> </ul>	<ul style="list-style-type: none"> <li>Developed by WG coordinated by a SAN Member.</li> <li>Supervised by the SAN Secretariat.</li> <li>Approved by the WG (through majority voting) and the SAN Secretariat before becoming official.</li> <li>If the SAN Secretariat deems it necessary, it shall request the relevant technical inputs from ISC.</li> </ul>

## 1.9 SAN Secretariat's Work Program

- The SAN-BD approves the SAN Secretariat's Work Programs every six months.
- Starting with the first SAN Secretariat's work program approval by the SAN-BD, this work program shall be posted every six months on the respective webpage in electronic format free of charge, including - on a monthly basis - SAN Secretariat's activities, type of processes (revision or development), international standard's or policy's name, its scope, objectives, justification, process-leading stakeholders, as well as the SAN Secretariat's contact information.

## 2. Main Stakeholders and their Functions

### 2.1 Stakeholders Involved in Developing Policy Documents and their Functions

The table below summarizes the different stakeholder functions in developing standards and additional criteria, interpretation guidelines, and related policies.

Stakeholder	International Standards and Additional Criteria	Related Policies	Interpretation Guidelines
<b>SAN-BD</b>	<ul style="list-style-type: none"> <li>Approve procedures for standard development</li> <li>Authorize the development of new Standards</li> <li>Entrust the SAN Secretariat with developing S&amp;P documents</li> <li>Revise and approve International Standards Committee (ISC) membership</li> <li>Formally vote the approval of completed international standards' or additional criteria development processes</li> </ul>	<ul style="list-style-type: none"> <li>Approve International Policy development procedures</li> <li>Authorize the development of new Policies</li> <li>Formally approve completed international policy development processes</li> <li>Formally vote on SAN's vision, mission, or general objectives' changes</li> </ul>	<ul style="list-style-type: none"> <li>Approve the composition of WG developing Interpretation Guidelines</li> </ul>

Stakeholder	International Standards and Additional Criteria	Related Policies	Interpretation Guidelines
<b>ISC</b>	<ul style="list-style-type: none"> <li>Decide on ToR for its development</li> <li>Provide technical inputs for their development</li> <li>Supervise development process</li> <li>Review ISF participation and ensure proper representation of all stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>If these policies have a social, labor, environmental, or agricultural contents, the ISC shall contribute to their contents.</li> <li>Provide technical inputs on request by the S&amp;P Secretariat or the SAN-BD</li> </ul>	<ul style="list-style-type: none"> <li>Approve structural and contents requirements for Interpretation Guidelines</li> <li>Provide technical inputs, if requested by the SAN-BD</li> </ul>
<b>SAN Secretariat</b>	<ul style="list-style-type: none"> <li>Supervise and approve development processes</li> <li>Responsible for writing draft standards or additional criteria on behalf of the ISC</li> <li>Acting as a liaison with the SAN-BD</li> <li>Coordinating SAN-BD voting on related processes</li> <li>Coordinate International Stakeholder Forum</li> </ul>	<ul style="list-style-type: none"> <li>Coordinate SAN External and Internal Policy development on behalf of the SAN-BD</li> <li>Develop international procedures to be subsequently approved by the SAN-BD</li> <li>Responsible for writing policy and related procedure drafts on behalf of the SAN-BD</li> </ul>	<ul style="list-style-type: none"> <li>Coordinate workshops with workgroups</li> <li>Responsible for writing drafts</li> <li>Review and revise, if required, Interpretation Guidelines and recommend their approval</li> <li>Act as a liaison between WG and the SAN-BD</li> </ul>
<b>SAN Members</b>	<ul style="list-style-type: none"> <li>Participate in ISC, as decided by SAN-BD</li> <li>Review and comment during their development process (public consultation process)</li> </ul>	<ul style="list-style-type: none"> <li>Review and comment during their development</li> <li>Provide technical inputs for their development</li> </ul>	<ul style="list-style-type: none"> <li>Participate in WG</li> <li>Review and comment during Interpretation Guidelines' development</li> </ul>
<b>Workgroup</b>	<ul style="list-style-type: none"> <li>Providing technical inputs for their development or revision</li> </ul>	<ul style="list-style-type: none"> <li>Providing technical inputs for their development or revision</li> </ul>	<ul style="list-style-type: none"> <li>Leading local indicator development under the S&amp;P Secretariat 's supervision</li> <li>Formally approving the Interpretation Guidelines' development process</li> </ul>
<b>Certification and Inspection Bodies</b>	<ul style="list-style-type: none"> <li>Review and comment during their development (public consultation process)</li> </ul>	<ul style="list-style-type: none"> <li>Review and comment during their development</li> </ul>	<ul style="list-style-type: none"> <li>Participate in WG</li> <li>Review and comment during their development</li> </ul>
<b>International Stakeholder Forum</b>	<ul style="list-style-type: none"> <li>Review and comment during their development (public consultation process)</li> </ul>	<ul style="list-style-type: none"> <li>Not applicable</li> </ul>	<ul style="list-style-type: none"> <li>Not applicable</li> </ul>

## 2.2 Committee Member Function, Selection, and Approval

The composition and function of the different groups involved in developing standards and policies, as well as rules for selecting and approving them, is provided below:

### 2.2.1 SAN Board of Directors (SAN-BD)

- *Function*

The SAN Board of Directors (SAN-BD) is responsible for:

1. Approving new or revised procedures for developing all SAN standards and policy documents.
2. Formally initiating or stopping processes for the development of standards and policies herein described.
3. Periodically approving and revising, if required, SAN International Standards Committee (ISC) membership.
4. Approving and revising, if required, Standards or Additional Criteria development or revision processes.
5. Approving workgroup composition.

The SAN Board of Directors is ***not*** responsible for:

- a. Resolving conflicts stemming from the standard implementation by certification or inspection bodies.
- b. Certification policies, conditions, requirements, cancellation, and processing.
- c. Auditor requirements, qualifications, and performance.
- d. Approving contents of Standards and Additional Criteria.
- e. Approving contents of Interpretation Guidelines (Local Indicators).

- *Composition*

The SAN-BD consists of up to 12 SAN Member representatives. Each member shall have the official support of its organization. The SAN-BD is composed by one Rainforest Alliance representative. Minimum 30% of the members must be recruited by original SAN members, (excluding the Rainforest Alliance representative). The governance period of each member is three years. The re-election of these members is subject to the SAN's General Assembly's decision. The SAN-BD decisions can be considered as official with the presence of a 75% of its members. When the SAN has more than 12 Members, the governance period of each member is three years.

- *Selection and Approval*

When the SAN has more than 12 Members, the SAN-BD shall consist of up to 12 members elected by the SAN's General Assembly. They shall be elected by significant majority voting (75% with possible negative votes, according to SAN agreement of November 2006).

### 2.2.2 International Standards Committee (ISC)

- *Function*

The International Standards Committee (ISC) is a standing committee elected by the SAN-BD. Any member of the International Stakeholder Forum (ISF) may be elected to sit on the ISC. The SAN Secretariat coordinates potential ISC candidate recruitment based on the stakeholder database. Their job is governed by the relevant issues specified in this handbook. The ISC is coordinated by the S&P Secretariat, as per respective approval by the SAN-BD. The ISC is formally in charge of developing policy documents, providing technical inputs for policy document drafts, and offering feedback to workgroups in charge of specific technical analyses. The ISC decides on the contents of a revised or new International Standard, Additional Criteria or related policy.

All ISC members shall declare their interests related to the development of standards and criteria being created or their revision process, as well as potential conflicts of interest. The SAN Secretariat may

exclude a committee member from a specific process on account of a particular conflict of interest. Members may also be excluded from the ISC if there is evidence they have not declared their conflicts of interest.

The SAN Secretariat shall establish a mechanism for filing ISF complaints against the ISC. These complaints may deal with such topics as conflicts of interest, behavior during document development, publicly declared positions, and others.

Another ISC member role consists of analyzing and commenting on policy document and related policy drafts, reviewing other stakeholder comments, and suggesting language on specific issues.

If the SAN Secretariat thinks an advanced version of a policy document may be approved by the ISC, the SAN Secretariat shall submit a formal position to the SAN-BD stating that the development process:

- Has undergone enough consultation and testing to identify its impact.
- Agrees with the goals and objectives specified in the relevant Terms of Reference.
- Warrants SAB approval.

The ISC makes decisions by consensus (67% in favor, with possible abstentions) and, in the absence of consensus, moves to majority voting (67% in favor, with possible votes against). Abstentions are not counted as negative votes, but are taken into consideration in the final calculation. The SAN Secretariat coordinates this voting. Therefore, the SAN Secretariat cannot vote nor be taken into consideration in the final vote calculation. The SAN Secretariat shall give all ISC members who are against a motion the opportunity of airing their views, as well as clarifying all possible doubts and concerns without unduly influencing each ISC member position, in order to achieve a favorable situation for a decision.

The SAN Secretariat watches over ISC responsible operation, pursuant applicable procedures. The SAN Secretariat makes sure all ISC members have equal opportunity of voicing their opinions and concerns. Similarly, it shall focus on reaching consensus among all ISC comments and recommendations.

The ISC suggests the approval of a policy document development process by means of a formal position submitted to the SAN-BD. ISC meetings are held once or twice a year, or as recommended by the SAN-BD or the SAN Secretariat.

- *Composition*

The ISC consists of up to 12 members elected by the SAN-BD. SAN Member employees may sit on the ISC. Nevertheless, representatives of certification or inspection bodies or representatives involved directly in certification activities may ***not*** be ISC members. The International Standards Committee's superior body is the Sustainable Agriculture Network's SAN Board of Directors (SAN-BD).

ISC members shall be highly qualified and have a specific interest in the topic of environmental and social impacts. They shall not have any financial stake in the success of standards or policy systems described in this handbook. They shall not represent the interests of their institutions, but rather constructively contribute to standards development. They shall be characterized by their vast

experience in environmental, social, or sustainable development projects, in general. Likewise, they shall understand the interrelationships between supply and demand of sustainably-produced agricultural and livestock products. Their involvement in the ISC shall be aimed at supporting the development of agricultural and livestock standards as a contribution to society.

The ISC composition shall seek a balance of both sector and geographic interests as follows:

Sector	Percentage
Sustainable Agriculture Network Representatives (4 members)	Up to 40%
External Representatives (8 members): 1. Technical Interests (scientists, academicians, and government) 2. Production-Business Sector Representatives 3. NGOs, Communities, etc.	At least 60% with proportional representation of the three sectors

Regional representation in the ISC shall be as follows:

Region	Percentage/ Number
Tropical Countries	> 50%
Latin America	Number of representatives defined by the SAN-BD according to SAN composition
Africa	
Asia	

Other member selection requirements include:

- a. Understanding and supporting SAN's mission and vision.
- b. Sound technical knowledge of and vast experience in issues to be considered.
- c. Understanding the potential impact of policy documents and related policies on multiple stakeholders.
- d. Representation of a wide range of points of view by different stakeholders affected by the standards.
- e. Updated knowledge of SAN procedures and systems, and experience in implementing them.
- f. Ability to review documents and comment on them in the International Standards Committee working language (English).

- *Selection and Approval*

External members shall be elected by the SAN-BD as an eight-member group, instead of individually, by consensus (67% without possible negative votes), so as to ensure an overall balance of interests. The same voting scenario applies to the four SAN internal members. ISC members serve for a two-year renewable term.

### 2.2.3 SAN Policy Committee

- *Function:*

The SAN Secretariat counts on the technical support of the SAN Policy Committee, which comments on aspects subject to discussion during the policy review and development processes in a more protagonist way.

- *Composition, selection and approval:*

The committee is composed of technical SAN representatives with experience in the review and implementation of policies and is approved by the SAN-BD. SAN representatives who function as International Standards Committee members, cannot be members of this committee.

#### 2.2.4 Workgroups

- *Function*

Workgroups produce specific technical inputs for:

- Local indicators included in the Interpretation Guidelines for specific countries/regions or crops.
- Reviewing standards and other policy documents.

The Workgroup shall be summoned and approved by the SAN Secretariat, which defines the specific group working language. The SAN Secretariat shall provide all documents required for ensuring adequate workgroup operation. Similarly, it shall provide translation/interpretation services, if required. Workgroup operation is supervised by the SAN Secretariat. The ISC may offer advice and support to a workgroup, if so requested by the SAN Secretariat or the SAN-BD.

Workgroups are chosen on the basis of the following criteria:

- Understanding and supporting SAN's mission and vision.
- Knowledge of and experience in the subject matter.
- Understanding the potential impact of the developed document.
- Representation of different stakeholders' points of view.

The workgroup shall operate according to the terms of reference specified by the SAN Secretariat. All workgroup members shall have received their relevant work procedures.

- *Composition*

- The table below shows a detailed composition of Workgroups in charge of developing Interpretation Guidelines (Local Indicators):

Sector	Absolute Number
SAN/ SANcert Representatives	1-2
Technical Interests (Scientists, Technicians, and Government)	At least 1-2
Production Sector Representatives	At least 1-2
Community Representatives, NGOs, etc.	At least 1-2
<b>Total Number</b>	<b>At least 4-6</b>

As to geographic representation, members shall represent their respective country or region.

- The table below describes the composition of Workgroups in charge of specific inputs for developing or revising an international standard or policy, or related policy documents:

Sector	Absolute Number
SAN Representatives	1-2
Academic Interests (Scientists and Technicians)	1-2
Production Sector Representatives	1-2
Community Representatives, NGOs, etc.	1-2
<b>Total Number</b>	<b>4-6</b>

- *Selection and approval*

The SAN-BD approves the workgroup composition.

#### 2.2.5 International Stakeholder Forum (ISF)

- *Function*

The SAN Secretariat is responsible for establishing and coordinating the International Stakeholder Forum. This forum has the purpose of making sure all stakeholders affected by the implementation of a SAN international standards & policy document are informed during the process of developing these documents, and that they have the opportunity of commenting on them during the public consultation process.

ISF members shall receive automatic notifications about all standards, additional criteria, and related policies to be developed, their drafts, and related reports via e-mail and the relevant webpage. The SAN Secretariat keeps a stakeholder contact database that can be accessed by SAN Members.

- *Composition*

ISF membership is open to any stakeholder, according to their interest. There is no limit on the number of existing or prospective stakeholders. The International Standards Committee reviews the ISF membership list to make sure they represent all stakeholders affected by the international standard or policy being developed.

- *Selection and Approval*

Not applicable.

### **3. Procedure for Agricultural Crops Not Covered by Valid SAN Documents**

Occasionally, certification or inspection bodies receive certification process applications for crops where environmental, social, labor, or agricultural practices may not be formally covered by valid SAN Standards & Policy documents.

In this case, the SAN Secretariat coordinates a process to analyze the practices not covered by SAN standards & policy documents:

1. A SAN representative appointed by the SAN Secretariat carries out a risk assessment (“*scoping*”) of issues (“*unsustainable agricultural practices*”) not covered by current standards & policy documents.
2. The SAN representative submits the relevant report on this analysis to the SAN Secretariat.
3. After analyzing the report, the SAN Secretariat issues a recommendation to the ISC.
4. The ISC then decides whether:
  - a. The crop is satisfactorily covered by current policy documents.
  - b. Development of binding Additional Criteria shall be started (approved by the SAN Board of Directors).
  - c. A process may be started just to develop an Interpretation Guideline providing local indicators to implement current policy documents, in the case of specific countries/regions and crops.

## 4. International Standards Development and Revision

### 4.1 Involved Stakeholders

- ISF, SAN-BD, ISC, SAN Secretariat, Workgroups.

### 4.2 Justification

The reasons for developing a new standard or revising an existing one stems from comments made by the full SAN or by other stakeholders through the website, e-mails received by [agstandards@ra.org](mailto:agstandards@ra.org) or gathered by other SAN Secretariat's activities. These Terms of Reference shall be formally submitted to the ISC by the SAN Secretariat. Terms of Reference for a Standard or Additional Criteria development or revision shall be approved by the ISC.

Proposal contents include the following:

- a. SAN member responsible for the document
- b. Background
- c. Goals and objectives
- d. Deliverables
- e. Contribution made by these goals and objectives to SAN's mission
- f. Continuing relevance and effectiveness of the standard in meeting the stated objectives (in the case of a standard revision)
- g. Existence of similar Standards & policy documents
- h. Technical inputs for developing the proposed document
- i. Requirements relating to conformity assessment or to marks of conformity
- j. Other SAN members supporting the initiative
- k. Stakeholders affected by the proposed document
- l. Defined participation goals for public consultation, including the number and nature of participants by stakeholder sector
- m. Estimated budget and potential financing sources
- n. Other resources available
- o. Workgroup and its composition
- p. Work plan
- q. Coordination and Supervision

#### 4.2.1 Review Frequency

The standards review process shall start three years after the official publication of the last version at the latest, or at SAN-BD's discretion, and shall be based on the respective analysis carried out by the SAN Secretariat.

*Note:*

- The ISEAL *Code of Good Practice for Setting Environmental and Social Standards* sets forth that every five years there shall be a process to review how effective a standard is in meeting its objectives, as well as a possible revision process.

#### 4.2.2 Building Additional Criteria in a New Version of a Standard

Additional Criteria for a new specific crop not covered by a previous version of the standard shall be properly built in a new version of a standard during its revision process.

### 4.3 Summary of the Procedure

Planning	• The SAN Secretariat drafts the ToR.
	• The ISC approves the ToR.
	• The ISC defines Workgroup composition.
	• The SAN Secretariat publishes the initiative.
Drafting	• Workgroups develop technical inputs and send them to the SAN Secretariat.
	• The ISC provides feedback to groups and supervises the drafting process.
	• The SAN Secretariat writes the first draft and submits it to the ISC.
Analysis	• The ISC approves the draft.
	• The SAN Secretariat translates the first draft and starts a 60-day Public Consultation (webpage, e-mail, and local workshops).
	• The SAN Secretariat analyzes comments received and writes the second draft with technical input from Workgroups.
	• The ISC checks the second draft and approves it.
	• The SAN Secretariat starts a 60-day Public Consultation.
	• The SAN Secretariat analyzes comments, writes the report and final draft with technical input from the Workgroups.
Approval and Publication	• The ISC checks the final draft and approves it.
	• The SAN Secretariat writes the public consultation report.
	• The SAN Secretariat writes a letter formally recommending approval and submits it to the SAN-BD together with the Standard.
	• The SAN-BD approves the final Standard.
	• The SAN Secretariat translates the Standard to the agreed languages.
	• The SAN Secretariat posts the Standard on the webpage where it is available for free download and disseminates it via e-mail to stakeholders within one month after SAN-BD approval, at the latest.

### 4.4 Detailed Procedure

1. The SAN Secretariat writes the draft version of the Terms of Reference (ToR) for Developing or Revising a Standard.

2. The ISC analyzes the Terms of Reference and defines Workgroup composition. In this case, the ISC requests the SAN Secretariat to build its comments in the ToR's final version. Finally, the ISC approves the ToR.
3. The SAN Secretariat coordinates Workgroups that provide technical inputs to this process.
4. Workgroups send their technical inputs to the SAN Secretariat.
5. The SAN Secretariat writes the first draft of the Standard with technical input from the Workgroups and submits it to the ISC.
6. The ISC approves this first draft for public consultation.
7. The SAN Secretariat translates this first draft to the respective languages (Spanish and English) and starts the 60-day Public Consultation through e-mails sent to the ISF, on the relevant webpage, and through local workshops.
8. The SAN Secretariat analyzes comments received.
9. The ISC writes the second draft with technical input from the Workgroups and approves it for public consultation.
10. The SAN Secretariat starts a second 60-day Public Consultation process.
11. If there were no significant comments during this last public consultation round, the SAN Secretariat drafts a development process report with the following contents:
  - a. A summary of the process followed in developing the standard;
  - b. Main issues discussed during the process and their follow-up;
  - c. Compliance with the ISEAL Alliance code;
  - d. Any departures from procedures described in this handbook, their justification, and approval mechanism;
  - e. An annex with all stakeholders that provided feedback on the standard, including names and affiliation;
  - f. A copy of ISC approval;
  - g. An annex with the final version of the standard.
12. Otherwise, if there were significant comments, this procedure is started anew at Step N° 9 of this procedure.
13. The ISC reviews these two documents.
14. If approved by the ISC, the SAN Secretariat sends the report, the final version of the standard, and the formal ISC letter recommending approval to the SAN-BD, pointing out that:
  - a. The standard has been subject to sufficient public consultation,
  - b. It met initial objectives of relevant ToR, and
  - c. It warrants SAN-BD approval.
15. The SAN-BD analyzes whether:
  - a. The report and related documents provide an adequate foundation for evaluating process quality;
  - b. The relevant SAN procedures described in this handbook were followed;
  - c. ISF composition was appropriate;
  - d. Stakeholder comments were properly answered and built in, and
  - e. The standard properly fulfills SAN's objectives and mission.
16. The SAN-BD approves the Standard's final version by consensus (with 67% of votes in favor and none against).
  - a. If the SAN-BD does not approve the Standard's final version this procedure begins again at Step N° 13 of this procedure.

17. The SAN Secretariat translates the final version of the Standard to the languages agreed upon by the SAN-BD. No fee is charged for these translated versions.
18. The SAN Secretariat posts the final version of the Standard and the development process report on the respective webpage, where it is available for free download, and disseminates them via e-mail to the International Stakeholder Forum within one month after SAN-BD approval, at the latest. For stakeholders that are not able to access electronically this document, they can write to the SAN Secretariat via regular mail in order to get hard copies at a reasonable cost-covering price.

*Note:*

- Section 6 provisions on Public Consultations shall apply.

## **5. Additional Criteria Development for New Crops**

### **5.1 Involved Stakeholders**

- ISF, SAN-BD, ISC, SAN Secretariat, Workgroups.

### **5.2 Development Justification**

Another binding SAN standards & policy document category is Additional Criteria for a specific crop not covered by current binding documents.

- Based on the SAN Secretariat analysis of the report, the ISC decides whether development of binding additional criteria shall be started, with ISC's prior approval.
- In this case the procedure defined in Section 4.4 of this Handbook shall apply.

#### **5.2.1 Additional Criteria Resulting from Local Indicators**

- SAN Additional Criteria for new crops may be proposed by Workgroups originally designated to develop Interpretation Guidelines with Local Indicators for specific crops.
- The SAN Secretariat may also propose converting indicators (from Interpretation Guidelines) into additional criteria for a specific crop when these indicators have significantly gained importance in audit processes to evaluate farms that grow a specific crop.

### **5.3 Procedure**

- For Additional Criteria Development, the same procedure authorized for Standards Development and Revision (see Section 4.4) applies.
- To this end, the word "*Standard*" shall be replaced by "*Additional Criteria*".
- Section 6 provisions on Public Consultations shall apply.

## **6. Public Consultation on Standards & Policy Documents**

### **6.1 Introduction**

This chapter summarizes the main issues of public consultation processes for SAN policy documents, i.e., Standards, Additional Criteria, or related Policies, with an environmental, social, labor, or agricultural contents.

SAN Standards & Policy document drafts shall be analyzed and commented on by the largest possible number of stakeholders, in order to get feedback about the potential impact of these documents on stakeholders.

The relevant drafts are posted on the respective webpage, together with a summary of key points and a formal form. These documents may be downloaded without any additional cost. Additionally, they are circulated via e-mail to all SAN Members, as well as all International Stakeholder Forum (ISF) members.

## 6.2 Public Consultation Periods

Public consultation periods shall be:

- 60 days, for a SAN Standards & Policy document's first draft - or, in the case of a standard revision, 60 days for the existing standard).
- For the final draft of Additional Criteria, the period is 30 days.

Based on the number and contents of comments received, the SAN Secretariat shall define the number and extent of public consultation rounds to take place before a SAN Standards & Policy document is submitted to the ISC for approval.

- In case of developing new International Standards or revising existing Standards within the ISEAL Alliance Code framework, drafts shall be subject to *at least two public consultation rounds* before being submitted to ISC decision.

## 6.3 Comment Built-In

Comments received during a public consultation shall only be formally taken into account if they were:

- a. Made on the SAN Secretariat official form;
- b. Written in the language agreed upon for each case;
- c. Sent to the official electronic address assigned for each process.

All comments not meeting the above requirements – such as comments received via website or other forum in intervening period outside the formal comment period - shall be viewed as informal feedback, but shall be answered in accordance with the SAN Secretariat's capacity. Receipt of all formal comments shall be acknowledged to senders. Comments are collected by the SAN Secretariat.

The SAN Secretariat prepares a report:

- a. Summarizing issues discussed in comments;
- b. Analyzing the range of stakeholder groups that submitted their feedback;
- c. Summarizing responses to each comment on a table, and whether they were built in the next draft version;
- d. Attaching a list of all formal comments received;
- e. Participation levels compared with previous standard-setting activities.

This report is circulated to all ISC members and posted on the webpage, together with the next draft of the standard. The SAN Secretariat and the ISC shall analyze feedback sources to make sure comments received were sent by all key stakeholder constituencies potentially affected by the proposed policy document.

## 6.4 Additional Public Consultation Modes

The SAN Secretariat shall be proactive in seeking inputs from stakeholder representatives who have not sent their comments. Similarly, through local public consultation meetings it shall seek feedback from potentially affected marginalized groups unable to participate in the electronic consultation process.

Possible additional modes of getting feedback during public consultation processes are outlined below:

- National stakeholder meetings (either face-to-face or videoconference/online meetings) led by SAN local representatives.
- Summary of comments received at the national level (by name and affiliation).
- Face-to-face meetings between SAN representatives and the ISC, either particularly organized or in parallel to other meetings.
- Face-to-face meetings with other expert stakeholders.
- Field pilot testing of final drafts.
- Internet discussions organized by the SAN secretariat.
- Every SAN Member circulates document drafts to stakeholders in each country via e-mail. Received feedback is then submitted to the ISC through the SAN Secretariat.

## 7. Interpretation Guidelines (Local Indicator) Development

### 7.1 Interpretation Guidelines Objective and Use

How the *Standard for Sustainable Agriculture* with its criteria is interpreted and applied to particular situations is determined by *Interpretation Guidelines*. Two types of guidelines exist: 1.) Generic interpretation guidelines and 2.) Local Interpretation Guidelines.

- Generic Interpretation Guidelines provide guidance for farmers and group administrators how to implement the Sustainable Agriculture Standard on their farms.
- Interpretation Guidelines – generic and local - only contain indicators. They are not binding for certification processes, but they are important for implementing good agricultural practices on farms and provide more detailed guidance during audit processes.
- Local Interpretation Guidelines interpret the binding criteria of the standard for local conditions or a specific crop and are developed by a local Workgroup.

The development of Local Interpretation Guidelines is led by Workgroups which are coordinated by SAN's Secretariat and organized by the local SAN representative. The balance of interest among the different stakeholders possibly influenced by these guidelines is assured and approved by SAN's Board of Directors. SAN's Secretariat coordinates the writing of local and generic interpretation guidelines. The final version of guidelines is approved by the Secretariat.

The members of Workgroups that develop Local Interpretation Guidelines have to comply with the following requirements:

- Understanding and support for SAN's mission and vision.
- Knowledge and experience with respect to the topics under discussion.
- Comprehension of the potential influence that this document can have.
- Representation of the different points of view of interested stakeholders.

These workgroups gather specific input for local interpretation guidelines, such as:

- Best farm management practices for ecosystem conservation in the region.
- Information about native trees that can be used in reforestation efforts.
- Local legislation regarding protection of ecosystems, riparian zones, endangered plants and animals, deforestation and reforestation. Also, information about local and regional conservation programs, protected areas, watersheds and corridors.
- Information about local diseases, pests, necessary agricultural practices and other factors that can influence the economic sustainability of farms.
- Local labor and occupational health laws executed by the local health and labor ministries or related authorities that can orient farms to implement their social policies.
- Best practices for erosion prevention and waste management.

Interpretation Guidelines are developed by local workgroups in coordination with the SAN Secretariat. These workgroup meetings are organized by the local SAN representative. This process insures a balanced interest among the different stakeholders that may be influenced by these guides. Workgroup composition is approved by the SAN-BD. The SAN Secretariat coordinates the wording on an interpretation guidelines' draft and approves its final version. A minimum of three face-to-face workshops is required to develop an Interpretation Guideline. The language in an Interpretation Guideline shall be the one mastered by a majority of workgroup members.

## **7.2 Stakeholders Involved**

- SAN-BD, S&P Secretariat, Workgroups.

## **7.3 Interpretation Guidelines' Development Procedure**

1. A SAN Member conveys to the SAN Secretariat the need for developing local Interpretation Guidelines for a specific crop.
2. The SAN Secretariat sends procedures and generic documents to the SAN representative with proper instructions for inviting representatives from production, technical-academic-government, and NGO/community sectors, including a defined date and venue to hold the first workshop.
3. The first workshop is conducted with the overall objective of:
  - Defining issues in Sustainable Agriculture Criteria for producing a specific crop warranting local interpretation for the specific country.
  - Specific objectives are:
    - a. Summarizing the new standards & policy development processes and involved stakeholders.
    - b. Discussing which labor and environmental issues warrant local interpretation for the specific country.
    - c. Gathering technical inputs for future local indicators for sustainable production of a specific crop for a specific country.
    - d. Confirming the workgroup that shall continue developing the interpretation guidelines.
    - e. Defining the next steps in developing the final guidelines.
4. The SAN representative leads this first workshop and writes down the relevant comments made by stakeholders attending the workshop.
5. The SAN representative organizes these comments and sends the first draft of the Interpretation Guidelines for the specific country and crop to the SAN Secretariat.

6. The SAN representative initiates the document completion process with the workgroup based on this first draft. This activity may be carried out remotely through electronic communication means or during a second workgroup workshop.
7. In a second workshop the topics are analyzed further in sub-workgroups on: 1. environmental aspects, 2. social and labor aspects and 3. agronomic aspects.
8. If necessary, additional workshops are organized with the presence of all participants or the members of a sub-workgroup.
9. If the workgroup and the SAN representative consider the document contents is finished, they submit the last draft to the SAN Secretariat.
10. The SAN Secretariat reviews the document. If deemed appropriate for publishing, it submits it to the Workgroup to be voted on by a majority (over 50% of votes with possible negative votes). If it is not considered appropriate for publishing, the process starts again at step N° 6.

## **8. Policy Development and Revision**

### **8.1 Introduction**

Policies developed with SAN Secretariat coordination are classified in two types:

1. Internal Policies: They are for internal SAN use and regulate such issues as communications, coordination with Certification and Inspection Bodies, as well as other aspects to be defined by the SAN-BD and which have no significant impact on involved stakeholders. This policy category is defined by the full SAN and approved by the SAN-BD.
  2. Policies with environmental, social, labor, or agricultural contents: The contents of this policy category are defined by the ISC.
- The SAN-BD decides when a new policy development shall start.
  - The SAN-BD shall request ISC advice, if deemed necessary.

### **8.2 Involved Stakeholders**

- Internal Policy: Full SAN, SAN-BD, SAN Secretariat.
- Environmental, social, labor, or agricultural policy: Full SAN, SAN-BD, SAN Secretariat, ISC.

### **8.3 Procedure**

#### 8.3.1 Internal Policy development

1. The SAN Secretariat continuously collects inputs from the full SAN and prepares an analysis on received inputs.
2. The SAN Secretariat gets in touch with the full SAN to announce the consultation process.
3. During the consultation process with SAN, the SAN Secretariat gathers all inputs received and properly analyzes them for contents and validity.
4. After every 15-day consultation period, the SAN Secretariat builds comments received in this period into the new policy draft and disseminates them again to the full SAN.
5. The SAN Secretariat may draft the policy's final version if no significant comments were received in the previous consultation period.
6. The SAN Secretariat submits this final version of the relevant policy to the SAN-BD for approval.
7. If the SAN-BD does not approve it, this procedure shall start again at Step N° 4.
8. If the SAN-BD approves the policy, the SAN Secretariat starts the publication process.

- a. In the case of an internal policy its official version is disseminated to the full SAN, with the provision that it is a document intended for internal use only.

### 8.3.2 Environmental, Social, or Agricultural Policy with External Impact

1. The SAN Secretariat continuously collects inputs from the full SAN and prepares an analysis on received inputs.
2. The SAN Secretariat gets in touch with the full SAN to announce the consultation process.
3. During the consultation process with SAN, the SAN Secretariat gathers all inputs received and properly analyzes them for contents and validity.
4. After every 15-day consultation period, the SAN Secretariat builds comments received in this period into the new policy draft and disseminates them again to the full SAN.
5. The SAN Secretariat also builds comments received from the ISC in this period into the new policy draft.
6. The SAN Secretariat may draft the policy's final version if no significant comments were received in the previous consultation period.
7. The SAN Secretariat submits this final version of the relevant policy to the SAN-BD for approval.
8. If the SAN-BD does not approve it, this procedure shall start again at Step N° 4.
9. The official version of the policy is disseminated via e-mail to the International Stakeholder Forum within one month after SAN-BD approval, at the latest and posted on the respective webpage where it is available for free download.

## **8.4 Policy-Related Complaints**

- The SAN Secretariat shall gather all the comments received about related policies coming from the full SAN through the relevant webpage or the e-mail address [agstandards@ra.org](mailto:agstandards@ra.org).
- The SAN Secretariat shall properly respond to complaints and use them as inputs for its report to the SAN-BD.
- The SAN Secretariat shall include these complaints in its semester report to the SAN-BD.
- Based on this analysis, the SAN-BD decides whether or not a formal policy review process shall be initiated.

## **9. Benchmarking to External Standard Systems**

### **9.1 Introduction**

In the case of benchmarking processes (*comparing to standards from different systems*) for educational purposes only, they can be carried out by any SAN Member. These processes, however, shall be conducted in a coordinated manner to prevent duplication of efforts within SAN. Members shall inform the SAN Secretariat about existing documents of this nature.

Only the SAN Secretariat is authorized to coordinate new official benchmarking processes.

### **9.2 Involved Stakeholders**

- SAN Secretariat, SAN member.

### 9.3 Procedure

In the case of benchmarking processes (*comparing to standards from different systems*) meant to create official and binding documents for the purpose of providing certification services of other external systems, in parallel to the *Rainforest Alliance certified*<sup>TM</sup> process, the following steps shall be respected:

1. The SAN Secretariat shall select the process leader of the draft wording, who can come from any SAN Member.
2. The SAN Secretariat shall provide the process leader with the respective template for benchmarking processes.
3. The leader drafts the first version of the process using this template.
4. The SAN Secretariat reviews this version and sends its comments to the process leader.
5. The process leader builds these comments in and submits the final draft to the SAN Secretariat.
6. The SAN Secretariat approves the final version.
7. The SAN Secretariat decides on the use of this document, as well as the communication mode with representatives of the other system.

## 10. Stakeholder Communication with the SAN Secretariat

### 10.1 Complaint Resolution Mechanism Concerning the Contents of this Handbook

The SAN Secretariat shall gather all comments received about Standards & Policy document development or revision procedures described in this SAN Standards & Policy Development Handbook through the e-mail [agstandards@ra.org](mailto:agstandards@ra.org). Complaints can relate to the content of a standard or the procedure by which that standard was developed.

- Complaints related to the content are dealt with through the regular standard review and revision process.
- Complaints related to procedures are addressed by the process outlined in section 10.3 below.

### 10.2 Involved Stakeholders

- ISF, SAN Secretariat, SAN-BD.

### 10.3 Procedure

1. The complainant shall send its complaint about the non-compliance of a procedure covered by this Handbook to the SAN Secretariat through [agstandards@ra.org](mailto:agstandards@ra.org) or via regular mail.
2. The SAN Secretariat analyzes the complaint, considering the contents of this SAN Standards & Policy Development Handbook.
  - a. If the received complaint is not justified, since the respective procedures have been in compliance, the SAN Secretariat shall respond directly to the complainant.
  - b. If the received complaint describes a significant non-compliance of the procedures described in this SAN Standards & Policy Development Handbook, the SAN secretariat shall forward it to the SAN-BD.
3. The SAN-BD might decide to consult the opinion of the International Standards Committee, if necessary.

4. The SAN-BD or its representative shall respond formally to the complainant.
5. The SAN-BD or its representative shall advise the SAN Secretariat on corrective actions concerning the compliance of the respective procedures.
6. The SAN Secretariat posts the complaint resolution process report on the respective webpage where it is available for free download, covering the complete process.

## **11. Decision Making on Processes Not Covered by this Handbook**

### **11.1 Introduction**

If the SAN Secretariat considers there could have been significant departures from procedures described in this handbook, the SAN-BD may approve an extraordinary procedure. In making a proper decision, the SAN-BD shall be based on the systems and stakeholders described in this handbook. In such a case, it may consult the opinion of the ISC or ISEAL Alliance experts.

### **11.2 Involved Stakeholders**

- SAN Secretariat, SAN-BD.

### **11.3 Procedure**

1. The SAN Secretariat shall report to the SAN-BD any departure from procedures described in this handbook. The report shall explain the nature of the departure, as well as departure reasons and justification.
2. The SAN-BD shall analyze the report and decide whether it shall:
  - a. Authorize the described departure, or
  - b. Determine a corrective action that is binding to the S&P Secretariat.The SAN-BD has the discretionary power to propose additional actions.
3. If a SAN Standards & Policy document's final draft cannot be agreed on within the time period specified in the Terms of Reference approved by the ISC, the SAN Secretariat shall seek advice from the SAN-BD on the next relevant steps to mitigate the situation.
4. The SAN-BD may authorize the option of extending the specified period to complete a SAN Standards & Policy document's development or revision process.

## **12. Documenting Processes Described in this Handbook**

The SAN Secretariat shall provide ISEAL Alliance and stakeholders with evidence of its actions taken following the procedures described in this handbook. To this end, it shall document the respective processes, in both physical and digital formats, for a minimum of five years.

The SAN Secretariat shall document:

1. The full process to elect and renew International Standards Committee members.
2. All comments received during public consultation processes for SAN Standards & Policy documents.

3. All comments received during internal consultation processes with the full SAN concerning policies or other documents that are not binding to stakeholders, as well as a summary of comments received and answers to them.
4. Terms of Reference for SAN Standards & Policy Document Development or Revision.
5. International Standards Committee member names, applications, and resumes.
6. Workgroup member names, affiliations, and E-mails.
7. ISF stakeholder names, affiliations, and E-mail contacts for public consultation processes.
8. Copies of all drafts of Standards, Additional Criteria, Interpretation Guidelines, and related Policies.
9. Records of significant departures from procedures described in this handbook.
10. Extraordinary procedures approved by the SAN-BD.
11. ISC face-to-face meeting minutes.
12. Minutes of SAN-BD decisions made on issues defined in this handbook.
13. SAN-BD decisions on SAN Standards & Policy document's development and revision processes.
14. Public Consultation Reports.
15. Complaints filed on development processes described in this handbook, as well as their resolution mechanism with the respective report.

Annex: Illustration of a Public Consultation Process

