

# Transition Policy & Summary of Changes

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## *Responsibly Managed Peatlands Standard*

### **Background**

A new version of the Responsibly Managed Peatlands Standard V1.0 has been published and implemented starting January 1, 2018, replacing the previous version. Previously, operations were audited to the Veriflora Standard V3.1 and Responsibly Horticultural Peat Moss Production Annex. All operations currently certified to the Annex must transition to the new version through a transition audit according to the current audit cycle (i.e., during a regularly scheduled re-certification or surveillance audit).

SCS has developed the following Q&A's and Summary of Changes to help facilitate the transition.

### **Q&A's**

#### **Why has the Standard been revised?**

It is considered best practice to review and revise standards every five years through a transparent stakeholder consultation process. This helps ensure that standards remain useful tools in the marketplace. The challenges faced by producers and other supply chain actors are different now from what they were when the standard was first launched.

The objectives of this revision are to incorporate the latest best practices in responsible peat moss production, foster continuous improvement, and align with other industry-level initiatives related to environmental and social responsibility.

SCS Global Services built upon the key areas of strength in the Responsible Horticultural Peat Moss Production Annex, and used the following organizations and reference tools as key sources of information:

- Canadian Sphagnum Peat Moss Association (CSPMA)
- Québec Peat Moss Producers Association
- Ducks Unlimited Canada
- Coastal Zones Research Institute
- Université Laval, Peatland Ecology Research Group
- WSP Group
- Global Social Compliance Programme (GSCP) Reference Code
- Pesticide Action Network (PAN) International List of Highly Hazardous Pesticides

## **What are the major differences and what benefits does the new version bring?**

The Responsibly Managed Peatlands Standard V1.0 is largely comparable to the previous version, with targeted updates to incorporate industry best practices and market expectations, as well as input from external stakeholders. The most noticeable changes to the standard relate to its new structure for an easy-to-use, streamlined approach, including:

- Incorporation of requirements into a single, standalone standard (previously, operations were audited to Veriflora V3.1 and the Responsible Horticultural Peat Moss Production Annex);
- New format to clearly indicate each specific requirement;
- Removal and incorporation of Tier 2 requirements for a single-tiered system; and
- Clarification of certification scope, with a focus on processes and inputs under the production company's management or ownership (the handler scope is to be addressed separately).

Other minor updates stem from feedback from previous audits and stakeholders, such as the relaxation of certain documentation requirements.

For more details on the differences between V1.0 and the previous requirements, please refer to the section below titled Summary of Changes.

## **What is the earliest possible date to conduct a transition audit from the Responsible Horticultural Peat Moss Production Annex to the Responsibly Managed Peatlands Standard V1.0?**

The earliest possible date to receive a transition audit (or initial audit) was January 1, 2018, pending auditor availability.

## **I am currently certified to the Responsible Horticultural Peat Moss Production Annex and the applicable requirements in the Veriflora Standard V3.1. What should I do?**

The Responsibly Managed Peatlands Standard V1.0 replaces the Annex starting on January 1, 2018. If you wish to maintain your certification, you will need to be audited against the Standard V1.0 during a regularly scheduled re-certification or surveillance audit in 2018.

SCS recommends that you begin to take steps now to prepare for the transition. Since every production operation is different, the steps needed to adjust your practices are likely to be unique to your operation. However, below are some tips to help you get started:

- 1) Familiarize yourself with the new Standard V1.0. The information below titled Summary of Changes will help you identify areas of change.
- 2) Identify any conformance gaps which need to be addressed to meet the new requirements and develop an implementation plan.
- 3) Update existing management system to meet the revised requirements and build awareness for key personnel.
- 4) Contact SCS with any questions regarding the transition to the new version.

In the coming month, SCS will send out additional tools to assist with the implementation, including:

- Responsibly Managed Peatlands - Certification Manual
- Responsibly Managed Peatlands - Greenhouse Gas Inventory Policy and Reference Guide

### **What can you expect after your audit against V1.0?**

The Audit Report will be sent to you generally within 20 business days from the date of the Closing Meeting, accompanied by the Non-Conformity Report (NCR) and Corrective Action Plans (CAPs), specifying the minimum number of NCs that must be closed in order to comply with the conformance criteria. You must then complete the Corrective Action Plans (CAPs) that sufficiently address the specified number of NCs and submit to SCS, typically 30 calendar days from the date on which you received the NCR-CAP.

SCS will then review the CAPs within approximately 10 business days. If a CAP and supporting evidence is deemed sufficient to address the issue that triggered the NC, the NC will be closed. If insufficient, SCS will send you a New Information Request (NIR). Responses to NIRs must be received within 15 calendar days, or the timeframe specified by SCS. When the NCs specified in the NCR-CAP form have been closed, SCS will make a certification decision.

Starting on January 1, 2018, SCS has implemented a new policy for closure of NCs. All NCs must be closed within five rounds of CAPs, or an estimated 180 calendar days from the NCR-CAP delivery date. Failure to present CAPs and supporting evidence sufficient to close the NCs within these limits may lead to certification denial (evaluation or re-evaluation audit) or certification suspension (surveillance audit). For 2018, extensions will be granted for those NCs that are related to new standard requirements on a case by case basis, as determined by SCS.

### **What is SCS' transition policy for newly added requirements?**

Operations undergoing an initial audit and that do not currently hold a certificate will be expected to comply with all base requirements (i.e., requirements not identified as “Year 1” or “Year 2”).

For existing certificate holders, the majority of the standard requirements must be met by the time of the transition audit according to the relevant year of their certification cycle. Operations will be audited to all requirements, and any non-conformities (NCs) will be issued accordingly. For those newly added requirements that will likely present compliance challenges, SCS will consider an extended CAP period of up to one year from the date of the closing meeting.

In addition, the requirement 6.2.1. will be reviewed during the audit in 2018, but a non-compliance will be evaluated as an Opportunity for Improvement (OFI). This approach was taken to allow sufficient time for the operation to address all aspects of the requirement. Starting January 1, 2019, this requirement will be evaluated according to whether the operation is in compliance or not, and a full corrective action will be expected in cases of non-compliance.

#### ***6.2.1 Greenhouse Gas Inventory and Target (Year 1)***

*6.2.1.1 The Producer shall develop an accurate baseline GHG inventory, expressed in terms of metric tons of carbon dioxide equivalent (CO<sub>2</sub>e), as indicated in the “Responsibly Managed Peatlands – Greenhouse Gas Inventory Policy and Reference Guide.”*

*6.2.1.2 The Producer shall use the baseline GHG inventory as the basis to develop a GHG target and strategies to reduce the GHG emissions and/or increase GHG sequestration, with timetables for implementation.*

*6.2.1.3 The Producer shall track and document progress toward meeting the GHG target.*

## Summary of Changes

This guidance summarizes the changes to the SCS Responsibly Managed Peatlands Standard V1.0 in order to inform stakeholders of the changes made during the revision and consultation process, and to facilitate the transition process for certified and prospective operations. The rationale for the new version includes:

- Improved usability and clarity;
- New recognition opportunities as a standalone standard;
- Engagement of stakeholders and incorporation of feedback;
- Incorporation of industry best practices and market expectations; and
- Other minor updates.

## Framework, Conformance, Scope & Other General Changes

- **Scope of audit** - Focus on processes and inputs under the client’s management or ownership (including facilities involved in screening and mixing); handler scope to be addressed separately
- **Merged documents** - The Standard is a standalone document with merged requirements from the Veriflora Standard V3.1 and the Peat Moss Production Annex
- **Single tier conformance** - Removal of Tier 2 requirements
- **Chain of custody** - Clarification that applicable sections of the Standard must be evaluated for facilities in the supply chain until the point where the product is in its final state
- **Legal requirements** - Clarification that certification requirements do not override national and provincial legal obligations
- **Plans and documentation** - Distinguish between two types of plans: Peat Moss Production Plan (based on anticipated conditions) and Rehabilitation Plan (plan for harvested areas, to be reviewed annually and updated as necessary)

## Peat Moss Production Plan

- **New documentation requirements** - Description of peat resources and moss conditions, mapping of the operation requirements (e.g., HEV areas, anticipated area for rehabilitation and donor sites, water flow direction)
- **Added flexibility** - Flow diagrams no longer specifically required

## Rehabilitation Plan

- **Goals for the rehabilitation** - Added language about basing goals on an evaluation of remnant peat conditions and site specific characteristics
- **Monitoring** - New monitoring plan requirements that specify the evaluation of water levels and vegetative surveys, which take into account the time necessary for propagules to establish
- **Clarification of donor sites** - Description of donor site characteristics (e.g., do not include the HEV areas; may include donor sites that have already been used, or Sphagnum farming sites; may be included in the buffer zones)
- **Donor site area** - Focus on written justification and evidence demonstrating there are sufficient diaspores for restoration or rehabilitation; donor site(s) may represent less than 10% of the peatland harvest areas under limited circumstances

## Water Quality Management

- **Estimating costs** - Estimated cost for water quality program no longer required
- **Added flexibility** - Flow diagram, maps, and/or descriptions are sufficient

## GHG calculations

- **Additional guidance** - “Responsibly Managed Peatlands – Greenhouse Gas Inventory Policy and Reference Guide” is under development, and includes:
  - List of calculators for understanding operational GHG emissions
  - References related to landscape conversion/peat harvest impacts on GHG and general activities that could mitigation emissions
  - Documentation requirements

**\*Note:** 6.2.1 Greenhouse Gas Inventory and Target will be reviewed during audits in 2018, but any non-compliance will be evaluated only as an Opportunity for Improvement (OFI) to allow time for operations to adopt necessary practices for this requirement. The requirement will be fully evaluated starting January 1, 2019.

## Engagement with communities

- **Flexibility with annual meetings** - Frequency requirement modified to at least every 3 years and/or when significant changes to the operation would impact the community (e.g., bog opening)

