

Veriflora® Sustainably Grown V4.0 and Responsible Horticultural Peat Moss Production Annex V3.0:

Revision and Stakeholder Review Process and Guidance on Key Changes

Introduction

SCS initiated a process to update the Veriflora® Sustainably Grown Standard, and the corresponding Responsible Horticultural Peat Moss Production Annex, leading to the development of the Draft Standard Version 4.0 and Draft Annex Version 3.0, respectively. The objectives of the revision process are to build on key areas of strength in the previous versions, and incorporate the latest best practices in responsible horticultural production and peatland management. Veriflora® Sustainably Grown V4.0, and the corresponding Responsible Horticultural Peat Moss Production Annex V3.0, will be developed in accordance with SCS' Standards Development Procedure, which emphasizes stakeholder input and transparency.

Standard Revision and Stakeholder Review Process

Step 1: SCS committee meets to develop recommendations for revisions to the Draft Standard V4.0 and Draft Annex V3.0.

Step 2: SCS solicits and receives feedback from stakeholders on proposed revisions during 60-day public consultation.

Step 3: SCS committee analyzes input received during public consultation.

Step 4: As necessary based on feedback during Step 2 and changes made in Step 3, SCS solicits and receives comments from stakeholders during an additional 30-day public consultation period.

Step 5: SCS publishes Version 4.0 of the Veriflora® Sustainably Grown Standard and Version 3.0 of the Veriflora® Responsible Horticultural Peat Moss Production Annex, and communicates implementation plan to stakeholders.

Stakeholder Review Details

SCS approaches diverse stakeholders in the supply chain, including producers, retailers, industry partners, NGOs and other groups interested in sustainable horticulture. The formats of communication are an online comments form and phone calls and/or face-to-face meetings as needed. Stakeholders completing the online comment form can attach their specific comments in a variety of uploadable file formats. To facilitate the review process, SCS provides a summary overview of key changes (see below). Once the consultation process is complete, SCS will collect, sort and process all comments through a systematic review process.

How to participate

Stakeholder feedback is a critical step in the revision process to ensure a robust Standard V4.0 and Annex V3.0. SCS invites comments from the general public and interested stakeholders. To access documents pertaining to participation in public consultation, please visit SCS' Stakeholder Review of SCS Standards webpage: <https://www.scsglobalservices.com/stakeholder-review-of-scs-standards>.

Guidance on Key Changes

Below is an overview of the key changes made to the revised Draft Standard V4.0 and Draft Annex V3.0, with references to the new requirement numbers noted as applicable. The rationale for the proposed revisions includes:

- Improved usability for self-assessment by users
- Elimination of introductory paragraphs and focus on succinct, auditable requirements
- Updates (e.g., definitions, references)
- Clarification of scope
 - Description expanded and parameters defined
 - Whole product life cycle no longer included
 - Organic-specific requirements no longer included
 - Sector-specific requirements incorporated, with separate Annex for Veriflora® Responsible Horticultural Peat Moss Production
 - Terminology modified (e.g., Ornamental Horticultural Operation)
- Modification of Tier-2 requirements to focus on new recognition opportunities for best practices

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Prerequisite Requirements

- Record-keeping requirements reduced to three years (3.1.2.)
- Written requirements referred to in specific sections, with narrowed focus of Ornamental Horticulture Production Plan to serve as a compilation of documents for compliance to Standard requirements (3.1.3.)
- Traceability requirements broadened to allow for flexibility in systems (3.1.4.)

Environmental Sustainability

- Focus on legal requirements in country of production and on MRLs for import country; elimination of requirement that international operations would also need to conform to legal requirements in U.S. (4.1.1.3.a.)
- Focus on prohibited pesticides referenced in international reference lists, rather than on use restrictions based on risk assessment (4.1.1.3.b. and Appendix 1.)
- Phase-out plan requirement limited to sterilization/fumigation agrochemicals (4.1.1.3.d)
- Focus on nutrient management plans that demonstrate optimization of uptake and plant health, and minimization of environmental impact (4.2.2.1.)

- Peat Moss use restricted to responsibly produced substrate material (e.g., Veriflora® Responsible Horticulture Peat Moss Production) (5.5.1.8.)
- New recognition opportunities related to:
 - Pesticide drift minimization (4.1.1.4.)
 - Improvement of soil structure, tilth, and Soil Organic Matter (4.2.1.4.)
 - Water conservation practices for greenhouse operations (6.1.1.3.)
 - Air resource management (6.3.1.)
 - Recycling, reuse, or on-farm disposal of organic waste (7.2.1.1.b.)
- Agroecosystem health and functional biodiversity monitoring and documentation moved to Tier 2 requirement (4.2.2.6.)
- Removal of requirement for calculating indirect energy (formerly 9.2.1.5.)
- Energy Efficiency Index calculation requirement associated with energy and fuel use moved to Tier 2 requirement (6.2.2.2.)

Social & Economic Sustainability

- Increased clarification and prominence of worker protection provisions related to:
 - Worker understanding of written work agreements (8.1.1.1.a.)
 - Non-discrimination definition (8.1.1.1.e.)
 - Collective bargaining policy communication (8.1.1.1.d.)
 - Protection for workers paid on piece-rate basis (8.1.1.1.g.)
 - Recruitment, hiring practices and use of guestworker programs (8.1.1.1.h., 8.1.1.1.i.)
 - Workers' rights to terminate employment and freedom of movement (8.1.1.1.j., 8.1.1.6.c.)
 - Process for resolving workplace issues with workers (8.1.1.4.g.)
 - Age verification for child labor protection (8.1.1.5.b.)
 - Risk of exposure to high noise levels, temperatures, dehydration risk, etc. (8.2.1.6.b.)
 - Worker safety when transportation is provided (8.3.1.6.b.)
- Removal of requirement for written policy for labor contractors – focus on direct access to documentation (8.1.1.2.h., formerly 11.1.1.1.t.)
- New recognition opportunities related to:
 - Policies for worker pay increases and promotions (moved from Tier 2) (8.1.1.2.i.)
 - Protection of community resources (9.1.1.1., 9.1.1.2.)
- Worker training on Ornamental Horticulture Production Plan and on certain risk procedures moved to Tier 2 requirements (8.2.2.2.a., 8.2.2.2.b.)

Product Integrity

- Focus on industry-recognized food safety plan; removal of specifications of the plan, requirement for GAP and/or GMP audit, and conformance to U.S. FDA guidance principles (11.1.1.1., formerly 14.1.1.1., 14.1.1.2., 14.1.1.3., and 14.1.1.4.)

- Focus on pesticide residue compliance with destination country MRLs; removal of reference to USDA NOP levels and U.S. FDA action thresholds (11.2.1.1., formerly 14.2.1.1.a. and 14.2.1.1.b.)

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Producer Requirements

- Focus on international applicability and addition of compliance with relevant international laws and binding agreements (3.1.1.1.a., 3.1.1.1.b.)
- Clarification that restoration or Sphagnum farming is required on all harvested areas (3.1.2.2.a.)
- Requirement added regarding assurance that Rehabilitation Plan is thoroughly executed (3.1.1.2.e.)
- Clarification of monitoring requirement of non-exploited peatlands (3.1.2.3.a.)
- Greenhouse gas emission assessment scope clarified (3.3.1.2.)
- Focus on community engagement process for receiving and addressing community feedback (3.6.2.1.)