

## **Comment on Farm Sustainability Assessment 2.0**

### General remarks

1. The German Farmers' Organisation and the German Raiffeisen Federation recognize the consumers' increasing demand for sustainable agricultural products. The concept of sustainability is of the utmost importance to German farmers because they work in and with nature and because they already farm their land for generations and pass on their farms to the next generation. Furthermore, agricultural production standards within the European Union are amongst the highest standards worldwide and are enforced by the Common Agricultural Policy (CAP) as well as other European and national laws, e.g. environmental laws. This has to be taken into account by any concept or label showing sustainable agricultural production methods.
2. From a farmer's point of view any sustainability standard has to follow a general principle: if the food industry demands production standards above prevailing legal standards or even specifies its own production standard, farmers have to be paid for complying with these requirements because production costs will rise.
3. The subscribing organisations urge the food industry to involve farmers and their organisations in any considerations about sustainable agriculture and in the development of sustainability concepts with regard to agriculture. Farmers and their organisations are willing to start the dialogue with the food industry about sustainable production methods and to explain which sustainable production methods are already in place in Europe.
4. It is also important for farmers that food processors come to a common understanding regarding sustainable agricultural production methods instead of implementing a sustainability standard each. With the huge number of laws and e.g. quality assurance systems already in place, farmers are not able to comply with different schemes implemented by food processors individually. This is even more important as farmers usually are the weakest link within the supply chain and therefore often not able to achieve higher prices for sustainable agricultural commodities.

5. Against this background, the subscribing organisations appreciate the Sustainable Agriculture Initiative (SAI) as a platform which covers major players in the food industry with their accordant sustainability concepts and presents one global understanding of sustainable agriculture.
6. Moreover, we approve that SAI accepts legal standards in the EU as adequate and sufficient instead of implementing new standards above and in addition to prevailing legal norms. The fact that any production methods implemented and enforced by law do not have to be checked again by an auditor is very much appreciated. With this basic approach it is possible to downsize the bureaucratic burden for farmers.
7. Nonetheless, with the above mentioned approach, only the basic levels of SAI (bronze, silver) can be reached. If a farmer is required by the food processor to reach the gold level of SAI, additional questions from the FSA have to be answered. The fact that farmers have to fulfil additional criteria reduces the acceptance of SAI among the farming community tremendously. To make this point any clearer, we would like to refer to the implementation of SAI in Germany.

8. Example: Germany

In Germany, amongst others the REDcert certification system offers a certification according to the SAI Platform using the Farm Sustainability Assessment 2.0. With the prevailing law and the Cross Compliance rules within the Common Agricultural Policy the SAI bronze and silver levels are met by German farmers. To comply with the SAI gold level, German farmers have to fulfil at least another 18 criteria. From a farmer's perspective these criteria are not reasonable for the following reasons:

- Having European production standards in mind, some questions are not applicable because they refer to good agricultural practices and therefore they are self-evident. Hence, these questions should be deleted which would reduce the number of questions considerably. Moreover, some questions are not appropriate, e.g. asking for the economic viability of the farm.
- With the questions concerning the economic pillar of the sustainability concept, farmers fear that the auditor will analyse financial records, contracts or invoices which is not acceptable.
- Some topics (e.g. economic viability of the farm, irrigation, pest management) are addressed via several questions. By eliminating these doublings, the number of additional questions to reach the SAI gold level can easily be reduced.
- In some cases, it is not clear for the farmer how to prove that he complied with the FSA criterion (e.g. FSA 22 "Do you avoid soil compaction by farm machines or livestock?" and FSA 38 "Do you avoid crop disease cross-contamination?").

9. Discussions with farmers' organisation in other European countries have shown that the above mentioned comments not only apply to German farmers, but to farmers in other European countries as well. Therefore, it would be very much appreciated if SAI would take these comments into account while revising the FSA 2.0 and if SAI would seek further simplification for farmers.
10. In order to stick to the worldwide approach of SAI which is a good approach in terms of a level-playing field we suggest to use country-specific patterns in order to reduce the number of questions for German farmers and to eliminate self-evident questions. Farmers' organisations will be happy to give further input into the revision of FSA 2.0 and to advise SAI on common European agricultural practices in order to refrain from questions concerning good agricultural practices.

Detailed remarks:

These are the FSA criteria which German farmers have to fulfil in addition to the legal regulations in order to get to the SAI gold level (comments in italics).

Basic:

FSA 4 - Do you plan your activities to support the long-term economic viability of your farm?  
*This criterion refers to a sensitive topic. Farmers are not willing to present their business plan or any kind of financial record. In our opinion this question does not differ from FSA 6.*

FSA 9 - Do you have an up-to-date farm management plan that addresses all relevant farming risks and opportunities?

*See comment on FSA 4. This criterion is quite similar to FSA 5.*

FSA 13 - When selecting and using varieties, do you make an informed choice?

*This is common agricultural practice in Europe. When selecting and using varieties, farmers use test results generated from tests made in their regions in order to know whether a particular variety suits in that climate (temperature, rainfall).*

FSA 14 - Have you ensured that your new planting material and/or grafting material is of high quality and from trustworthy sources?

*This criterion does not apply to European agriculture.*

FSA 18 - Do you keep records of planting and/or grafting material used?

*This is part of good agricultural practice in Germany.*

FSA 38 - Do you avoid crop disease cross-contamination?

*Of course, farmers avoid cross-contamination in order to sell high-quality agricultural produce. How is a farmer supposed to prove that he fulfils this criterion?*

FSA 52 - Do you reduce, reuse, and recycle waste and by-products of harvesting and processing?

*How is a farmer supposed to prove that he fulfils this criterion?*

FSA 54 - If you irrigate, do you have a water use plan to optimize water usage and to reduce water waste?

*This criterion only applies to a limited number of farms. In content, there is no difference to FSA 55.*

FSA 71 - Do you take measures to maximize energy use efficiency such as optimizing your farm equipment, optimizing electricity use, etc?

*Maximizing energy use efficiency often requires investments in more energy efficient technology. SAI has to take into account that farms will not be able to invest in more energy efficient technology every year. Energy saving agricultural practices such as reduced tillage instead of ploughing are quite common in Germany – at least where this is applicable.*

FSA 73 - Do you discuss with customers the best timing for crop deliveries to ensure good prices and to maintain quality?

*For German farmers it is an integral part of their risk management plan to sell their crop at different times, i.e. not right after harvest but throughout the year. Hence, farmers always have to be in contact with their customers, so that this question is not of importance for the sustainability of German farms.*

Advanced:

FSA 5 - If you have only one source of income, have you considered the risks and is this an informed choice?

*see comment on FSA 9*

FSA 6 - Do you have a business plan to optimize the long-term economic viability of the farm?

*see comment on FSA 4*

FSA 10 - Do you regularly seek advice, training and collaboration on sustainable production, technologies and human resource management?

*Concerning the use of plant protection products, the German law pledges farmers to take part in trainings every three years.*

FSA 22 - Do you avoid soil compaction by farm machines or livestock?

*This is part of good agricultural practice in Germany. What kind of evidence is expected from the farmer?*

FSA 36 - Do you minimize side effects of crop protection product use by using selective pesticides (rather than broad spectrum), targeted application and/or seed dressing?

*This is part of integrated pest management and therefore good agricultural practice in Germany.*

FSA 37 - Do you prevent pest resistance by varying the type of chemicals?

*see comment on FSA 36.*

FSA 55 - If you irrigate, do you have a water management plan to optimize water usage, water quality, and water availability and to reduce waste water?

*see comment on FSA 54*

FSA 111 - Does your farm contribute actively to the neighbouring communities?

*Farmers do not understand why their private/social life is of concern to the food industry or the consumer.*