



## **QUESTIONS AND ANSWERS**

### **The Leonardo Academy ANSI Standard Development Process and the Sustainable Agriculture Practice Standard (SCS-001 Draft Standard)**

**Updated January 15, 2009**

This document provides a list of questions that have been submitted to Leonardo Academy regarding the ANSI process and the draft Sustainable Agriculture Practice Standard, along with short answers. It is periodically updated to include new questions as they are submitted. Response dates are noted in *italics*.

The document is currently divided into four sections:

- Part A. Leonardo Academy and the ANSI Process
- Part B. About the Sustainable Agriculture Practice Standard
- Part C. Sector Specific Issues
- Part D. Additional Comments for Subcommittee Consideration



---

## **Part A: Leonardo Academy ANSI Standard Development Process**

---

This section provides answers to questions related to Leonardo Academy and the ANSI process. Please reference the Leonardo Academy *ANSI Standards Development Constitution*, available at <http://www.leonardoacademy.org/Projects/SustainAgStdDevelopment.htm>, where indicated.

### **1) What kind of an organization is ANSI? How is it funded? Updated January 2008**

ANSI is a 501(c)3 private, not-for-profit organization, founded in 1918. Comprised of government agencies, organizations, companies, academic and international bodies, and individuals, ANSI represents the interests of more than 125,000 companies and 3.5 million professionals. Its annual budget is \$22 million. ANSI's sources of revenue, based on its 2005-2006 annual report, are as follows:

19% - Accreditation Services
4% - International Standards Programs
5% - Fee-Based Programs
2% - Net Investment Gains
20% - Membership Dues and Assessment Fees
50% - Publications

ANSI is the sole U.S. representative and dues-paying member of the International Organization for Standardization (ISO). As a founding member of the ISO, ANSI plays a strong leadership role in its governing body. For more information about ANSI's history and role in developing standards, please go to: [http://www.ansi.org/about\\_ansi/introduction/introduction.aspx?menuid=1](http://www.ansi.org/about_ansi/introduction/introduction.aspx?menuid=1)

### **2) How are ANSI Standards developed? Updated January 2009**

At the initiation of a project to develop, revise or reaffirm an American National Standard (ANS), ANSI-accredited standards developers must notify ANSI using a PINS form. A PINS form includes an explanation of the need for the standard and an identification of the stakeholders and will result in an announcement in *Standards Action*. In accordance with the ANSI Essential Requirements, the standard developer shall announce the activity related to the standard in suitable media as appropriate to demonstrate the opportunity for participation by all directly and materially affected parties. Development, approval and maintenance of the standard continue in accordance with the standard developer's ANSI-accredited procedures, as well as the ANSI Essential Requirements.

Prior to October 2008, ANSI standards could also be developed through the publication of a draft standard for trial use (DSTU). The DSTU option allowed the standard development process to begin from a point at which many basic tenets had already been field-tested. However, on October 2, 2008, ANSI announced that "Annex B: Draft American National Standards for trial use" of the ANSI Essential Requirements would be eliminated as an option for announcing standard development projects through ANSI. Any documents originally filed as "Draft American National Standards for Trial Use" no longer have recognized status through ANSI but can still be retained as draft standards for trial use within a standard developer's own system.



**3) How is the ANSI BSR-8 disseminated? February 2008**

A standard developer must submit a proposal for a new American National Standard or a proposal to revise, reaffirm or withdraw approval of an existing American National Standard to ANSI using the BSR-8 form. The action proposed via the BSR-8 is then listed in ANSI *Standards Action* to provide an opportunity for public comment.

**4) Referring to the press release announcements of 2006-2007: Where can these be found and what media outlets/conduits were they made in and when? February 2008**

- a) June 2005—Press release: “International Experts Tackle Sustainability Issues in Floral Sector: Announce New American National Standard Initiative.” SCS and NSF announce intention to work toward development of a draft national standard for sustainable agriculture under ANSI. Distributed through PR Newsire to national and agriculture industry trade press.
- b) March 2007—Press release: “New Certification Program to Recognize Socially Responsible Business Practices.” SCS and NSF announced labor component of draft standard under development. Distributed through eNR Services, Inc. to 932 national and trade media, and distributed at trade show.
- c) April 13, 2007—The publication of the draft standard for trial use was announced in ANSI *Standards Action* (<http://publicaa.ansi.org/sites/apdl/Documents/Standards%20Action/2007%20PDFs/SAV3815.pdf>)
- d) September 27, 2007—Press release: “National Sustainable Agriculture Standard Setting Process to be Launched This Fall.” SCS and Leonardo Academy announce the launch of standard setting process and the October 29-30 stakeholder meeting. Distributed to 1749 national and agricultural industry trade media, at PMA trade show and to 300+ interested stakeholders.
- e) October 5, 2007—SDO transfer to Leonardo Academy announced in ANSI *Standards Action* (<http://publicaa.ansi.org/sites/apdl/Documents/Standards%20Action/2007%20PDFs/SAV3840.pdf>)
- f) November 29, 2007—Press release: “Stakeholders Invited to Learn More about the National Sustainable Agriculture Standardization Process.” Leonardo Academy announces first stakeholder teleconference. Distributed through eNR Services, Inc. to 120 media outlets, plus 1,000+ interested stakeholders already in the Leonardo Academy database.

**5) What started this process and who besides ANSI was considered to lead it? February 2008**

SCS prepared the Draft Standard for Trial Use to initiate this ANSI Process. See Part B, Questions #2 and #3 for additional details.

**6) Is there any possibility that Leonardo Academy could go back to a PINS process for this standard? Updated January 2009**

In keeping with the actions required by ANSI regarding the elimination of "Annex B: Draft American National Standards for trial use," Leonardo Academy filed a PINS for SCS-001 on November 11, 2008, and official notification was made in the November 28th issue of ANSI *Standards Action*. Furthermore, all references to "Draft American National Standard for Trial Use" on the SCS-001 Sustainable Agriculture Practice draft standard document have been removed. Click [here](#) to view the updated document. The standard development process for SCS-



---

001 will continue to move forward as a candidate American National Standard through ANSI's PINs process. For more information see Part A, Question #2.

**7) What is the timeframe for completion of the standard? *January 2009***

Under the “Annex B: Draft American National Standard for trial use option,” the timeframe for completion of the standard was 36 months from the date of publication of the draft standard for trial use, or April 12, 2010. Now that ANSI has eliminated the DSTU option and a PINS has been filed to continue the standard development work for SCS-001, there is no deadline for completing the standard. However, Leonardo Academy is committed to providing the necessary administrative and facilitative resources to ensure that the standard development work moves along at a timely, efficient pace.

**8) How do you define stakeholders? What stakeholder groups will participate in the development of the standard? Where do government representatives and academic researchers fit in? *Updated February 2008***

The ANSI-approved Leonardo Academy *ANSI Standards Development Constitution* recognizes four stakeholder “interest groups” that must be equally represented in the establishment of standards — producers, users, environmentalists and general interest. For the purposes of this agriculture standard, these groups would be interpreted as follows:

- **Producer** – representative of entity that produces or supplies goods (growers, shippers, packers, farmer organizations,)
- **User** – representative of entity that uses goods (retailers and restaurants, food service companies, product handlers, processors, distributors, and manufacturers).
- **Environmentalist** – individuals and representatives of organizations focused on preserving and improving the environment
- **General Interest** – anyone not in the above categories (government representatives, labor groups and representatives, academic scientists, consumer groups, other interested parties)

**9) How is “interest” defined in regards to the stakeholder categories? *February 2008***

In accordance with the ANSI *Essential Requirements*, “interest” refers to any person (organization, company, government agency, individual, etc.) who is directly and materially affected by the standard under development.

**10) Into what membership category do the following fit: 1) suppliers, 2) processors, 3) packers, 4) importers and 5) consumers? *February 2008***

Within the Leonardo Academy *ANSI Standards Development Constitution*, these entities would fit into the categories as indicated:

- 8) Suppliers--*Producers*
- 9) Processors--*Users*
- 10) Packers--*Producers*
- 11) Importers--*Users*
- 12) Consumers—*Users*

**11) Why are “distributors” considered “producers” in the interest group categories? *February 2008***

Distributors are considered users, not producers. See Part A, Question #8.



**12) How were the four stakeholder groups established? The categories selected do not seem equitable (e.g. lumping government, non-environmental NGOs, academia and industry—all of which are major segments)? February 2008**

The stakeholder groups for the standards Leonardo Academy develops are based on the ANSI *Essential Requirement* criteria for giving consideration to at least the following interest categories: producer, user and general interest. These criteria also include giving consideration to additional interest categories where appropriate. Due to the nature of the standards it develops, Leonardo Academy expanded the stakeholder categories to include environmental interest groups. It is common procedure for ANSI standards development processes to have multiple players, such as government, non-environmental NGOs, academia and industry, within one main stakeholder group.

**13) What criteria do you use to consider “balance” in the composition of the Standards Committee in a sector like agriculture that has so many diverse stakeholders? Will each category represented on the Standards Committee have an equal number of members (e.g. ¼ producers, ¼ NGOs, etc.)? Is the ISO CSR process a useful model? February 2008**

The Leonardo Academy *ANSI Standards Development Constitution* requires that membership on a given Standards Committee be balanced among the interest categories. “Balance” shall be represented by an approximately equal number of members for each of the four interest categories, with no single interest maintaining a majority of the voting membership. In addition, all efforts will be made to ensure balance among the stakeholders within each interest category (e.g. large commodity producers vs. small diversified alternative producers within the ‘producer’ category).

**14) Since this standard cuts across many regulated areas, why have you not created a subgroup on the Standards Committee for government experts? February 2008**

If deemed necessary during the development process, the Standards Committee, Standards Committee Chair, or Secretariat may establish a subcommittee, task group, advisory group or resource group comprised of government experts to assist with portions of the standard, interpretations, or other advisory functions (Leonardo Academy *ANSI Standards Development Constitution*, Section 2.1.12). See also Part A, Question #12 for how the stakeholder groups were established.

**15) How do interested parties apply to participate on the Standards Committee or subcommittees? Updated January 2009**

The application deadline to participate on the Standards Committee has passed. However, anyone interested in participating in the standard development process via the Task Forces or non-voting subcommittees should contact Leonardo Academy for more information ([Development-SCS-1@leonardoacademy.org](mailto:Development-SCS-1@leonardoacademy.org), 608-280-0255).

**16) After the July 7<sup>th</sup> application deadline for Standards Committee membership, will the Committee membership be expanded if the topics/issues identified at the February 29<sup>th</sup> stakeholder meeting exceed the 40-member limit? Updated January 2009**

For most Leonardo Academy Standards Committees, it is unlikely that membership will exceed the recommended 40-member limit. However, the size of the Sustainable Agriculture Standards Committee was increased to 58 members to ensure that the voting body is broadly representative



---

of the many, diverse sectors of agriculture that fall under the current scope of this standard. Also, there is no limit on the number of individuals who can serve on Subcommittees, Task Groups, Advisory Groups, or Resource Groups.

**17) Who selects members of the Standards Committee? Why would someone be rejected from being a Committee member? Updated February 2008**

Leonardo Academy is solely responsible for the selection of Standards Committee members, based on applications received.

The Standards Committee is the voting body for the standard and, as such, is required to have equal representation from the identified stakeholder groups. Due to the limited number of seats on the Standards Committee, Leonardo Academy must be selective in choosing Committee members to ensure balanced representation. There is an appeals process in place that any applicant who is not appointed to the Standards Committee can pursue if they wish to be reconsidered for a seat. However, there are no such limitations to the number of people who can participate in subcommittees that will work on the interpretations and details of the standard. Applicants who are not on the Standards Committee can thus provide significant input through participation in subcommittees and task groups.

**18) What is the role of SCS in selecting the Standards Committee? February 2008**

SCS will have no role in selecting members, or advising on the selection, of the Standards Committee. Leonardo Academy is solely responsible for selecting committee members, based on applications received.

**19) Will an effort be made to place government officials on the Standards Committee? February 2008**

Government officials are considered to be interested stakeholders in the development of ANSI standards, and therefore may elect to participate in the development of such standards. Government representatives applying to serve on the Standards Committee for the Sustainable Agriculture Standard will therefore be considered for a seat on the Committee.

**20) Will agricultural economists be included on the Standards Committee? February 2008**

Agricultural economists are considered to be interested stakeholders in the development of this standard and will thus be considered during the Standards Committee selection process should they apply.

**21) Is it possible for the Standards Committee to have a production group member and trade organization member from the same agricultural group? February 2008**

There shall be a limit of one voting member from each company or organization on any Standards Committee, unless it can be demonstrated that a company or organization has interests in more than one category (see the Leonardo Academy *ANSI Standards Development Constitution*, Section 2.1.7).

**22) Will the membership of the Standards Committee and subcommittees be made public? How? February 2008**

Yes, Leonardo Academy will publicly disclose the membership of the Standards Committee and subcommittees.



**23) Does one have to be on the Standards Committee to also be on a subcommittee?** *February 2008*

No, members of subcommittees, working groups, advisory groups and resource groups are not required to serve on the Standards Committee.

**24) What is the anticipated time commitment for participation on the Standards Committee and subcommittees?** *Updated May 2008*

The time commitment required of Standards Committee members is estimated to be up to 8 hours per month, including meetings/teleconferences, meeting preparations, reviewing documents, voting, corresponding, etc. Members who choose to take on a leadership role (i.e., the Chair and Secretary) will invest more of a time commitment in the development process. Also, members are free to join any subcommittees they are interested in, thereby increasing their time commitment.

Subcommittee and advisory group commitments will vary depending on the level of debate over the issues at hand. Participants can expect to devote up to 4 hours per month while their respective subcommittee or advisory group is still active. Depending on the issues being addressed by the Standards Committee at a given time, there may be periods of higher intensity for certain subcommittee groups, which will taper off as subcommittee issues are resolved.

**25) What are the number and subject areas of the sub-committees and will they be balanced in terms of membership?** *Updated February 2008*

The number of subcommittees has not yet been determined. Since all votes are taken at the Standards Committee level, subcommittees are not required to meet the balanced membership requirements of the Standards Committee. Subcommittee involvement is open to all interested parties from any stakeholder segment. (See Part A, Question #26 for more details.)

**26) What process will the Standards Committee use to determine which sector-specific interest areas to include as Annexes in the standards development process? If the standards committee decides to include a new sector (e.g., dairy or livestock), would this require notice to an additional group of stakeholders? How would this be done and what would be the timeframe?** *Updated January 2009*

After the Task Forces have completed their work, the Standards Committee will begin to identify issue-specific and sector-specific (i.e., annex-related) subcommittees, working groups, advisory groups and resource groups based on the Task Force findings and recommendations, as well as stakeholder input to date. Subcommittee notices will be posted on the Leonardo Academy website, as well as through email notification to industry trade publications and to all self-identified interested stakeholders. Additional subcommittees may be suggested and considered by the Standards Committee at any time. The Standards Committee will review the list of potential annexes and other annexes that may be recommended by interested stakeholders and decide whether to proceed with development. If new subcommittees and annexes are developed, industry trade publications and all self-identified stakeholders will again be notified.

**27) Most successful indicators efforts start by developing principles and criteria based on the key issues and things people care about. Would you consider starting this process over by developing new principles and criteria?** *Updated January 2009*



---

This project was initiated with the filing of a Draft American National Standard for trial use (DSTU). The function of a DSTU is to serve as the starting point from which stakeholder discussions can ensue and to stimulate dialogue on key issues that must be addressed in order to establish a finalized American National Standard. However, the DSTU option no longer has recognized standing through ANSI (see Part A, Question 2). Furthermore, the Standards Committee agreed to treat the DSTU SCS-001 as one of many reference documents to be used in future standards development deliberations. Leonardo Academy has filed a PINS so that the standard development process for SCS-001 can continue to move forward. Thus, the process is essentially starting from general principles and criteria.

**28) Are governmental agencies, such as USDA or EPA, involved in the approval of ANSI standards? *January 2008***

Governmental agency representatives are considered to be interested stakeholders in the development of ANSI standards and, according to OMB Circular A-119, are encouraged to participate in voluntary consensus bodies to increase the likelihood that the standards they develop will meet both public and private sector needs. Thus, government agency representatives may elect to participate in the development of such standards, although they are not involved in the approval of ANSI standards per se. Additionally, ANSI standards may reference government regulations.

**29) Has USDA received notice of the ANSI process? *Updated January 2009***

Public notice has been provided in a variety of forms: notice in *ANSI Standards Action*, notice of change of SDO in *ANSI Standards Action*, which are widely read by standards organizations and interested parties, including governmental agencies. In addition, there have been public press releases, articles, public presentations, and direct outreach. Representatives from USDA have participated in outreach events, submitted applications for the Standards Committee and subcommittees, and have participated as observers in the Task Force teleconferences. Leonardo Academy maintains a roster of all participants in public outreach events.

**30) It seems as though the stakeholders represented at this meeting are the ones that stand to benefit the most from the creation of a Sustainable Agriculture Standard. It also seems as though there are no small farms represented. While I imagine the definitions of “small” vs. “large” farms are left up to the Standards Committee to decide, how can Leonardo Academy ensure equal representation of involved stakeholders if they do not have definitions to qualify producers? What has been done to include informed small/mid-sized producers in the process? *February 2008***

Leonardo Academy is committed to ensuring that small farmer interests are represented in the development of this standard. A lengthy outreach period to notify stakeholders about the standard has included many institutions and organizations with small farmer membership and networks.

**31) What is the balloting and comment process? To what degree is a consensus required under the ANSI process? *Updated January 2009***

The Standards Committee shall vote in accordance with the procedures outlined in the Leonardo Academy *ANSI Standards Development Constitution* (Section 4.0). Members of the Standards Committee will convene periodically to vote on issues brought forth throughout the standard development process. The Committee shall receive copies of all comments accompanying affirmative votes and abstentions and shall review these comments to determine what, if any,



---

actions will be taken by the Committee to address these comments. All public comments with objections shall be referred to the Standards Committee Chair or the subcommittee responsible for the part of the standard in question to attempt resolution. The Committee may request LEO to obtain further information from the commenter or attempt to correspond with the commenter directly. If substantial changes to the standard are required, the changes are subject to letter ballot. If changes are not made to the standard, then the response to the negative comment is subject to approval by vote of the Standards Committee, and the commentator will be informed in writing of the response. In addition, the commenter shall be informed of the appeals process.

Under the ANSI process, a majority vote is required. As such, with the Standards Committee comprised of 58 individuals (12 in each of the Producer, User, and Environmentalist categories and 22 in the General Interest category), 30 votes will constitute a majority. Moreover, under the ANSI process, a consensus will be sought. For every negative vote submitted, efforts will be made to address the concerns raised. If some members of the Standards Committee do not vote, then the majority of those voting is sufficient to pass the issue, provided that all negative votes with comments are addressed, in accordance with the Leonardo Academy *ANSI Standards Development Constitution* (Section 4.7).

It is important to note that members of the Standards Committee who fail to vote on two successive ballots are subject to automatic termination. An open seat would be filled by another representative of that stakeholder group.

**32) Is the process consensus-based or popular vote? February 2008**

Leonardo Academy's development process for this standard shall conform with the American National Standards Institute (ANSI) *Essential Requirements* for due process and consensus criteria. See also Part A, Question #31.

**33) Can the committee set a parliamentary process other than Roberts' Rules? Other consensus-building and multi-stakeholder negotiation processes use a consensus scale for decision-making. This may work better. February 2008**

According to the Leonardo Academy *ANSI Standards Development Constitution*, Robert's Rules of Order shall apply on questions of meeting procedure (Section 3.5).

**34) How does someone that is not member of the Standards Committee give input with suggestions or issues to the Committee? Updated January 2009**

Individuals who are not members of the Standards Committee are encouraged to participate in the Task Forces and/or subcommittees. The Standards Committee has developed six Task Forces that will work to gather additional data and resources that will be used to guide the development work of the Sustainable Agriculture Practice Standard. The six Task Forces are: 1) Needs Assessment, 2) Mission and Principles, 3) Reference Documents, 4) Metrics and Methodology, 5) Committee Funding, and 6) Outreach. The Task Forces are open to participation by any interested parties.

The subcommittees are advisory to the Standards Committee and will explore and develop options for addressing the many issues that will be deliberated over as the standard development process moves forward. The subcommittees will play an extremely significant part in the development of the standard by taking a direct role in crafting criteria and providing additional recommendations and guidance to the Standards Committee. Standards Committee members will



---

be participating in the working subcommittees and will take suggestions and issues back to the Committee for review. It is the responsibility of the subcommittee chair to communicate issues to the Standards Committee.

**35) Please re-state the “public comment” part of the process. How widely is public comment sought, and how will we know of the opportunity to comment? February 2008**

After the trial use period, Leonardo Academy shall notify ANSI, using the BSR-8 (Standards Action Public Review Request Form), that the version of the draft standard revised by the Standards Committee is available for public comment. The opportunity for public comment on the standard will be announced in ANSI *Standards Action*. Leonardo Academy will also send an email announcement to its list of interested and materially affected parties and media contacts that the standard is available for public comment. The Standards Committee will review all comments and determine what actions will be taken to address them prior to submitting the standard for ANS approval. See Section 4.10 and 8.0 of the Leonardo Academy *ANSI Standards Development Constitution* for more information

**36) Were there any public comments made regarding the draft standard prior to the public notice given in 2007? February 2008**

No.

**37) The appeals process outlined in the overview presentation dealt with PROCESS. Is there an appeals vehicle for the substance of the standard? February 2008**

The appeals process in the Leonardo Academy *ANSI Standards Develop Constitution* (Section 6.0) refers only to an action or inaction on the part of the Secretariat or Committees. Those wishing to comment on the substance of the standard will have the opportunity to do so during the public comment period following the end of the trial use period.

**38) Can you appeal a Secretariat (i.e. Leonardo Academy) action (e.g. standards committee selection), as well as a committee action? February 2008**

Yes, appeals can be made in response to both Secretariat and Committee action or inaction (see the Leonardo Academy *ANSI Standards Development Constitution*, Section 6.1).

**39) Can you give an example of a complaint and what types of issues may come up during this process that would be subject to complaint? Updated May 2008**

The types of issues that might be subject to complaint relate to such procedural issues as the selection of the Standards committee members, the process of achieving consensus on a particular vote, or by persons who have been or may be affected by any Committee action or inaction. Complaints are processed in a specific manner as stated in the Leonardo Academy *ANSI Standards Development Constitution* (Section 6.0).

**40) Is the ANSI process for this standard open to non-US parties? February 2008**

Yes, to the extent that these non-US parties are direct interested parties.

**41) Could you explain in a little more detail the connection between the adoption of the national standard and ISO (referenced above)? In ISO negotiations, does the US have to advocate for the “national standard” or is that not mandatory? February 2008**



---

ISO standards come about in a couple of different ways: they can be negotiated from scratch, or they can result from the harmonization of national standards. Once ISO decides to pursue harmonization, the US Technical Advisory Group (TAG) determines its position, including advocacy for the national standard, based on consideration of comments made both in writing and in person.

**42) How is the development of the Standard being funded? Will there be a public disclosure of who provides funding and in what amounts? *Updated January 2009***

The Committee Funding Task Force is working to identify potential funding sources to support full stakeholder participation, as well as Leonardo Academy's administration of the process. Initial seed funding has been provided by Scientific Certification Systems, author of the SCS-001 draft standard. If you are interested in donating financial resources to support this project, please contact Amanda Raster at Leonardo Academy ([amanda@leonardoacademy.org](mailto:amanda@leonardoacademy.org) or 608-280-0255). All funding sources for the development of this standard will be disclosed to the public.

**43) What will be the source of funding for the Standards Committee and subcommittee work? Are members of the Standards Committee and subcommittees reimbursed for travel and out-of-pocket expenses related to serving on the committees? *Updated January 2009***

The Committee Funding Task Force is working to identify potential funding sources to support the standard development process, including the work of the Standards Committee and subcommittees. At this point, committee members will be responsible for travel and out-of-pocket expenses associated with serving on the committees. As such, all attempts will be made to schedule meetings by conference call to make these meetings convenient for committee members. The opportunity for expense reimbursement may open up in the future.

**44) If this will be supported by private foundations and governmental agencies are not involved in the approval, how can this be considered open, public, and transparent? *February 2008***

This standard is being developed under Leonardo Academy's ANSI-accredited procedures, which requires that the due process requirements for standard development as specified in the ANSI *Essential Requirements* be followed. This process allows any person with a direct or material interest to participate on the Standards Committees, subcommittees and task groups; through the public comment process; and by right of appeal.

**45) Who will be responsible for the "promotion" part of the adopted standard? *February 2008***

The Secretariat (i.e. Leonardo Academy) will be responsible for announcing and promoting the adopted standard.

**46) How does ANSI accredit potential verifiers of standards? *October 2007***

The following language from the ANSI website describes ANSI's accreditation service:

"Conformity assessment is defined as a 'demonstration that specified requirements relating to a product, process, system, person or body are fulfilled.' There are many of these conformity assessment activities applied in today's marketplace including accreditation, certification, inspection, registration, supplier's declaration, and testing. The one dimension that ANSI is directly engaged with is accreditation.



---

Ultimately, the marketplace and customers of conformity assessment services measure the beneficial value of accreditation. For most suppliers, the primary benefit of accredited third-party certification is to meet a purchaser's or regulator's requirement for this independent evaluation of compliance. Increasingly, suppliers' procurement organizations are specifying accredited, third-party certification as an optional dimension of their systems for risk management.

#### **ANSI's Accreditation Services**

In the area of conformity assessment, ANSI provides accreditation services in the areas of product and personnel certification. This means the Institute recognizes the competence of bodies to carry out product or personnel certification in accordance with requirements defined in International Standards. ANSI's accreditation programs operate in accordance with international guidelines and have been verified by government and peer review assessments."

For more information, see web page:  
[http://ansi.org/conformity\\_assessment/accreditation\\_programs/benefits.aspx?menuid=4](http://ansi.org/conformity_assessment/accreditation_programs/benefits.aspx?menuid=4)  
The side bar on the web page lists a number of items under "Product Certification Accreditation."

#### **47) How does ANSI Accreditation of Conformity Assessors deal with guidance on conformity assessment and qualification of conformity assessment providers? *October 2007***

2.6.1 Appeals, complaints, and disputes brought before the Accreditation Committee by certification bodies or other interested parties shall be handled in accordance with Personnel Certification Accreditation Program procedures (PCAC-CA-503).

2.6.2 ANSI shall:

Maintain record of all appeals, complaints, disputes, and mediations relative to accreditation;  
Take appropriate corrective and preventive action; and  
Document the actions taken and assess their effectiveness.

#### **2.7 Access to Certification Body's Records of Appeals, Complaints and Disputes**

The Personnel Certification Accreditation Program requires each applicant and accredited body to make its records of all complaints, appeals, and disputes, and subsequent action available to ANSI, when requested to include during the initial accreditation process and annual surveillance reports.

For more information, see ANSI-PCAC-CA-501 at:

[http://www.ansi.org/conformity\\_assessment/personnel\\_certification/apply.aspx?menuid=4](http://www.ansi.org/conformity_assessment/personnel_certification/apply.aspx?menuid=4).

#### **48) If a standard contains guidance language on required qualifications of conformity for verifiers of the Standard, are these then included in the ANSI conformity verifier accreditation process? *October 2007***

The process of accrediting third-party verifiers (conformity assessment bodies) can be done through ANSI or through another organization. Guidance language for required qualifications should not be in the Standard, but instead should be incorporated into the policies and procedures which detail the process of granting authority to conformity assessment bodies.

If the accreditation of third-party verifiers is done by ANSI, there would be a supervising entity and an annual review of ANSI procedures of granting authority to field verifiers would take place



---

to ensure that ANSI was following the policies and procedures set forth in the developed guidelines for accreditation or to make alterations to the policies in place. If done by another organization (SCS, LEO, or another organization), the policies and procedures for the accreditation process should follow Guide 65. For more information on Guide 65, see: <http://www.ams.usda.gov/lsg/arc/iso65.htm>

The ACR 1210-A Checklist (linked to in the above web site) provides a reference guide for the documentation needed in developing the procedures and requirements for accreditation.

**49) How are the standards updated in the future to reflect new information, such as new scientific findings or economic analysis? February 2008**

Once a final standard is approved by ANSI and published as an American National Standard, the ANSI Essential Requirements requires that the standard “shall be kept current and relevant by means of timely revision, reaffirmation or action to stabilize. Standards developers are permitted three options for maintaining the standard: periodic maintenance, continuous maintenance or stabilized maintenance. For more details, see pages 19-20 in the ANSI *Essential Requirements*, available at <http://www.leonardoacademy.org/Projects/SustainAgStdDevelopment.htm>.

**50) What is SCS’ role and involvement with Leonardo Academy? February 2008**

SCS has no prior relationship with Leonardo Academy. SCS contacted Leonardo Academy as a registered ANSI SDO to request that Leonardo serve as the neutral SDO for this standard. See also Part A, Question #42 and Part B, Question #2.

**51) How long has Leonardo Academy been accredited as an SDO for ANSI? February 2008**

Since 2005.

**52) How many ANSI Standards has Leonardo Academy developed? Which standards? February 2008**

Leonardo Academy has announced the development of five standards:

1. Emission Inventories, Offsets, Reduction Credits and Tags (*LEO-5000-001*)
2. Sustainable Vehicles (*LEO-5000-002*)
3. Sustainable Organizations (*LEO-5000-003*)
4. Sustainable Agriculture Practice Standard for Food, Fiber and Biofuel Crop Producers and Agricultural Product Handlers and Processors (*SCS-001*)
5. Type III Life-Cycle Impact Profile Declarations for Products and Services (*SCS-002*)

Leonardo Academy has also been extensively involved in the development of the LEED for Existing Buildings rating system, using an ANSI-like process.



---

## **Part B: About the Sustainable Agriculture Practice Standard**

---

This section provides answers to general (non-sector-specific) questions specifically related to the Sustainable Agriculture Practice Standard. **Please note that the “Draft American National Standard for trial use” option is no longer recognized by ANSI (See Part A, Questions 2 and 6 for more information). Furthermore, the Standards Committee is now treating the SCS-001 draft standard as a reference document (See Part A, Question 27). For purposes of this Q&A, the document will be referred to as the “SCS-001 draft standard.”**

**1) When was the Draft Standard for Trial Use (DSTU) announced through ANSI? *Updated January 2009***

April 13 2007. Since that time, however, ANSI has announced that "Annex B: Draft American National Standards for trial use" of the ANSI Essential Requirements would be eliminated as an option for announcing standard development projects through ANSI. See Part A, Question 2 for more information.

**2) What is SCS’ role? Why SCS? *Updated January 2009***

SCS prepared the SCS-001 draft standard to initiate this ANSI process. SCS has been working on sustainability issues in the agricultural arena for more than two decades, with programs aimed at certifying exceptional levels of achievement in terms of product purity, safety, flavor and nutrition. SCS has also played a major role in helping to establish sustainability standards in other sectors, including forestry and fisheries management. For more information, see “Establishing an American National Standard for Sustainable Agriculture,” available at [www.scs-certified.com](http://www.scs-certified.com).

**3) Why a national sustainable agriculture standard? Why now? *January 2008***

Interest in practicing, defining, standardizing and certifying sustainable agriculture has grown dramatically in the past decade around the globe. This rising level of interest has been fueled by a range of critical environmental and social concerns, such as global warming, water shortages, species extinction, dangerous working conditions, unfair labor practices and disregard for local communities. In response, dozens of sustainability initiatives and programs — proprietary and collaborative, public and private — have emerged.

A large and growing segment of consumers in the US are actively seeking to support companies whose agricultural products are grown and handled sustainably. However, there is little agreement about what sustainability means. Moreover, there is considerable confusion over, and disagreement about, the relationship between “sustainable,” “organic,” “locally grown,” “IPM” and “food miles.” As the sustainability market heats up, with competing claims and definitions, this confusion is likely to increase. When there is market confusion, as well as an absence of government regulations, voluntary national standards serve as a vehicle for resolving differences to retain public confidence.

This national standardization initiative has been launched to provide a forum for vetting these differences and capturing the collective wisdom of those individuals and organizations that have been leading the way in defining and establishing sustainable practices. A national, non-



---

proprietary standard that has been vetted in an open, transparent process by key stakeholders can serve many purposes:

- Define sustainability practices and indicators throughout the supply chain on a life-cycle basis
- Guide producers and handlers through stages of incremental improvement
- Distinguish best practices in crop production and handling
- Provide consistent guidance to producers supplying the US market, regardless of country of origin
- Provide a common set of metrics to gauge sustainability progress — whether in a private supply chain, in an industry sector, or on a state/regional/national scale
- Establish an agreed-upon national framework for future international standardization initiatives
- Support companies in the development and implementation of supply chain management programs
- Set a reference benchmark for private sustainability efforts
- Certify conformance to selected customer requirements/expectations
- Certify conformance to standard for product labeling

**4) What is the history and motivation of SCS regarding this draft standard? How was the scope of the standard determined?** *February 2008*

See Part B, Questions #2 and #3.

**5) Why is the trial use standard copyrighted by SCS if it is ‘non-proprietary’?** *February 2008*

All draft standards are copyrighted. This does not change the fact that ANSI standards are voluntary and can be used by anyone.

**6) Should the use of the name SCS not be reduced in the draft standard text?** *February 2008*

This is a subject that will be discussed by the Standards Committee and appropriate subcommittees.

**7) Is a definition of “Sustainable Agriculture Production” provided in the draft standard? Is the draft standard using an existing definition, or providing a new one?** *Updated January 2009*

The narrow definition of sustainable agricultural practices provided in the definitions section of the SCS-001 draft standard is intended to serve as a placeholder only: “Agricultural production and product handling activities that result in the production and delivery of products in a manner that is economically viable, ecologically sound and socially responsible.” There has been considerable debate nationally and internationally about the definition of this term, and it will be left to the Standards Committee to take up the question of whether such a definition should be provided and what such a definition would be.

**8) Is the ultimate goal of this effort to require “organic” and not just “sustainable” goods?** *Updated January 2009*

The SCS-001 draft standard recognizes that crop production practices are part of the larger mix of issues that are addressed within the context of sustainability. Within the area of crop production,



---

organic pest management and soil fertility practices are recognized as the highest tier of performance. As summarized in the draft standard, Section 7:

- **Pest/Disease Management**

“The Producer is required to apply least toxic pest and disease management and control systems, integrating organic practices as these are proven to be practical, with organic conversion timeframes to be determined on a per crop, per region basis. Where organic practices are unable to be fully implemented on a practical basis, the Standard establishes minimum requirements related to the use of registered pesticides and fertilizers, integrating practices that minimize the overall use of synthetic pesticides and fertilizers and that direct the Producer toward use of the lowest risk pesticides.

- **Agro-Ecosystem Health: Soil Fertility, Soil Conservation and Erosion Control, and Soil Quality and Functional Biodiversity**

The Producer is required to approach agro-ecosystem health in a manner that maintains or improves the functional biodiversity, as well as “the physical, chemical, and biological condition of the soil and minimizes soil erosion . . . in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances.” . . . Organic soil enhancement and fertility principles and practices are recognized as best practice, for crops and regions where such practices are proven to be practical, including the phase-out of synthetic pesticides and fertilizers; soil fertility, conservation and erosion control practices; biodiversity protection; and plant nutrition.

The central focus of this portion of the standard is the creation of a healthy agroecosystem, along with risk reduction. As shown in 7.1.1.3, a risk matrix is applied in evaluating chemical use, whether synthetic or botanical in origin. This includes an assessment of the practical availability of alternatives, consideration of worker and environmental protection measures, consideration of pest management strategies involving pesticide rotation, etc. Organic practices that would negatively impact other aspects of sustainability (e.g., water quality, ecosystem health) would not be a practical option from the larger perspective of the standard.

**9) On the list of experts consulted, why apparently have no national “mainstream” agriculture and commodity associations been consulted in developing the draft standard? *Updated January 2009***

The SCS-001 draft standard was developed with extensive input, but clearly a much wider net must be cast in the development of the final standard. Agriculture and commodity associations are among the many stakeholders invited to participate in the development process of an American National Standard for Sustainable Agriculture. Leonardo Academy will continue its outreach to these groups to encourage their involvement in the standard development process.

**10) In developing the draft standard, what group standards have you employed to the existing draft? Did you include the Healthy Grown/Protected Harvest standards developed by the U of WI and producers? *Updated January 2009***

Numerous published standards were consulted in the development of the SCS-001 draft standard, including the Protected Harvest standards. For a complete list, see the Acknowledgements section in “Establishing an American National Standard for Sustainable Agriculture,” available at [www.scs-certified.com](http://www.scs-certified.com).



**11) You plan to involve producers, handlers, and processors. Will distributors also be involved (e.g., sustainable transportation, delivery, fair practices)? Updated January 2009**

Yes. The SCS-001 draft standard defines “handler” as: “The legal entity that is responsible for the storage, processing, conditioning, packaging, distribution, chain of custody and/or sale of agricultural products, and that is not a producer. It includes, but is not limited to, distributors, re-packers, transporters, and brokers, as well as retail establishments.”

**12) The proposed ANSI standard seems to include a huge and diverse group of producers and a wide range of criteria. .... Can one standard truly cover and still be fair to all of these producers? Updated January 2009**

To address the broad array of agricultural segments included in the SCS-001 draft standard, it is structured in two parts — the core body of the standard, which establishes general requirements applicable across agricultural sectors, and sector-specific annexes, which delve into the issues of unique interest to a specific sector. This structure will allow the standard to expand to meet the needs of many sectors. There is no requirement that such sector-specific annexes be completed within the current timeframe.

**13) Who decides the issues that need to be included in the CORE standard, i.e. Environmental Issues, Social Issues, Economic Issues, Product Integrity Issues, Etc.? Is there a way to amend this list? Updated January 2009**

The Standards Committee will deliberate the issues included in the core of the standard and will consider any issue-specific and sector-specific recommendations put forth by the advisory subcommittees when deciding the content of the final standard. There will also be an opportunity for public comment on the final draft standard before submission to ANSI for approval as an American National Standard.

**14) What are the advantages of including specific interest areas as Annexes to the overall sustainable agriculture standard as opposed to developing a separate ANSI standard for discrete interest areas such as livestock, dairy, and biofuel crops that may be different in significant ways from other agricultural sectors? Updated January 2009**

The SCS-001 draft standard was written to focus solely on agricultural crops; it does not address livestock, dairy, or wild crops. With respect to agricultural crops, there are numerous areas of overlap in which one set of requirements can be developed that are applicable across the board. To the extent that common elements can be identified and standards adopted, educational efforts concerning sustainability issues and innovations will be strengthened. Another advantage is that producers will be able to rely on a single agricultural plan and sustainability management structure, although details may vary from crop to crop or region to region. The precedent of developing a core set of standards, with sector-specific annexes or supplements, is well established in existing standards for sustainable agriculture.

**15) Are the annexes that are currently in use also open for evaluation, comment and review? February 2008**

Yes.



**16) Can the scope of the standard be narrowed or separated into discreet units, e.g. sustainable crop production? February 2008**

The Standards Committee will ultimately decide how to address issues related to the scope of the standard during the development process.

**17) The draft scheme is so broad—so many issues to comply with. This makes it unachievable in practice for small producers. Does the set-up chosen for the draft not make it impossible to be a success for a big group of producers? Have you considered modular certification as NRS does and present small steps for a big group of producers? February 2008**

A variety of approaches have been discussed to ensure that small farmers are able to participate. This subject will be discussed further by the Standards Committee and appropriate subcommittees.

**18) How can you put out a draft standard and then tell us to disregard it as a working document? Isn't that counterproductive? Updated January 2009**

The SCS-001 draft standard served as the starting point for stakeholder discussion on key issues that must be addressed in order to establish a finalized American National Standard for Sustainable Agriculture Practice. The Standards Committee has recognized the extensive effort of and hard work put forth by SCS to initiate the discussion on sustainability. However, in the interest of coming together and working toward a common goal for agricultural sustainability, the Standards Committee agreed to set aside the SCS-001 draft standard as a reference document for future standards development deliberations. Leonardo Academy has filed a PINS for this project, thus the process is essentially starting from general principles and criteria. See Part A, Question 2 for more information.

**19) We have heard this standard be described as organic plus? Please explain what that means? I have heard it used two ways. One definition is that organic plus refers to a standard that includes a preponderance of organic practices plus pesticide and fertilizer use where necessary. The other definition is organic practices plus the social aspects of sustainability. Updated January 2009**

The term “organic plus” is not part of the SCS-001 draft standard but is understood to refer to environmental and/or social requirements applied to organic growers that extend beyond the requirements defined in the US National Organic Program or other recognized organic programs. Other uses of the term may also exist. However, as the current draft standard was written to be applicable to *all* production systems, not only to organic growers, it is not an organic plus standard nor is its intent to be an organic plus standard.

**20) Can you explain the contrast between the sustainable agriculture standards development with the National Organic Program? February 2008**

The sustainable agriculture standard is being developed under the ANSI process, while the National Organic Program was developed by the US Department of Agriculture under a regulatory mandate. For further information, see the ANSI and USDA NOP websites.



**21) How was U.S. agriculture and law considered in the draft standard created by SCS?**

*February 2008*

US agricultural practices and laws were consulted in the drafting of the standard. See, for instance, references contained in Section 4 of the draft standard.

**22) Are proposed standards to be science-based?** *February 2008*

Yes. Sound science should inform all standards development. Given the complexity of issues addressed within the area of sustainable agriculture, scientific input is critical to the ongoing development of this standard.

**23) In the WTO TBT agreement, the US has committed to use international standards as the basis for its standards, yet this one has no references to any international standards. Why is this? Would it conflict with, or should it be considered in relation to relevant international standards, such as the IPPC environmental standard?** *Updated January 2009*

There are references to numerous international standards in the SCS-001 draft standard addressing specific issues (e.g., International Labor Organization conventions) — see Section 4. Additional such references may be added by the Standards Committee. However, there is not yet a recognized international standard for sustainable agriculture for crops (e.g., ISO), although many standards are used internationally. Given that ANSI is the official standards body representing the U.S. within the International Organization for Standardization (ISO), if an ISO Task Group is established to harmonize standards, the ANSI standard for sustainable agriculture could become part of these harmonization efforts.

**24) Do you plan to coordinate with existing processes going on under the ANSI standard-setting process on Biofuels?** *January 2008, Updated February 2008*

Yes. If more than one ANSI standard under development is addressing the same issue, then it is the responsibility of the respective SDOs to contact each other to determine where potential overlapping issues may exist, in an effort to coordinate standards development.

**25) What will be the position of the standard towards other initiatives (e.g., will there be an option to be benchmarked / to receive mutual recognition)?** *February 2008*

This kind of issue will be considered and decided upon by the Standards Committee.

**26) Please discuss the current exclusion of genetically modified planting stock in the draft standard?** *Updated January 2009*

The SCS-001 draft standard is largely non-prescriptive in terms of specific technologies, methods and innovative sustainable agriculture standards currently in use around the world, as well the US National Organic Program, which received wide stakeholder input from a cross-section of interested parties, in adopting the precautionary principle with respect to genetically modified planting materials. There remains considerable concern that while GMOs may offer significant potential benefits, sufficient data have not yet been provided to ensure that use of such materials do not have unintended environmental and human health consequences. Additional arguments have also been made, e.g., the degree to which the patenting of seed stocks runs counter to sustainability principles and may disadvantage small and mid-scale sized farms. Stakeholders who hold a different position are invited to present their views in the Standards Committee and subcommittees that will be considering this issue before the standard is finalized.



**27) In terms of pest management, how are you addressing regional and local differences in pest occurrences on crops and control measures? *January 2008***

Regional and local differences for all components of the standard will be addressed in sector specific annexes by the respective subcommittees.

**28) Will invasive species (plants) be considered? *Updated January 2009***

The subject of invasive species has not been directly addressed in the SCS-001 draft standard. This is an important issue that should be addressed by the Standards Committee. The provisions of the draft standard that address ecosystem management and protection (Section 8) recognize the planting of native species in buffer zones as a best practice. Other provisions intended to protect habitats indirectly support native species. Further provisions can be considered by the Standards Committee.

**29) Isn't EPA already addressing the most hazardous chemicals? Is this the middle ground area between what EPA approves and organic? Newer approved chemistries are supposed to be safer. *January 2008***

The SCS-001 draft standard adopts a risk-reduction based approach to agrochemicals, calling for the gradual phase-out of chemicals that pose acute or chronic health risks or eco-toxic risks, regardless of whether these chemicals are synthetically or organically derived. It also recognizes that practical limits may exist and takes into consideration risk mitigation strategies and the availability of alternatives.

**30) The word or concept of “health” is not an ecological term — what to you mean by “health”? *February 2008***

In the context of potential risks from agrochemical usage, the term “health” is used in the context of acute or chronic *human* health risks, such as cancer, reproductive system damage, neurotoxicity, etc.

**31) How is the risk matrix to be composed? *Updated January 2009***

The proposed risk matrix is described in Section 7 of the SCS-001 draft standard. It takes into consideration the following factors: acute human health risks to workers and handlers (EPA Class I-II); chronic human health risk to workers and handlers (Q\*), known eco-toxicity (“moderate or greater risk); availability (or lack thereof) of pest/disease management alternatives; adequacy of worker protection measures; adequacy of environmental protection measures.

**32) What is the value basis for the high ecological value habitat/species? Will it be national, state/provincial, local or community based? *February 2008***

National, state/provincial, and/or local identification of areas of high ecological value determined under recognized valuation schemes are the basis of this designation.

**33) How does carbon sequestration and storage apply to perennial crops such as orchards and vineyards? The soil will only hold so much; what happens once the limit is achieved? How do you know what those limits are? *February 2008***

This is a subject that will be discussed by the Standards Committee and appropriate subcommittees.



- 
- 34) Where do alternative energy sources fit in, such as solar and biofuel? Are such sources really sustainable? (Solar is very expensive; ethanol may have more of a negative footprint than popularly thought.) February 2008**

This is a subject that will be discussed by the Standards Committee and appropriate subcommittees.

- 35) Please define “water capture” as noted in 9.1.1.4. February 2008**

This refers to precipitation onto greenhouses or other farm areas that can be channeled into groundwater recharge (on or off farm) as a conservation measure to ensure that run-off does not negatively impact the ecosystem.

- 36) To what extent is the “life cycle” of the production process considered? February 2008**

The life-cycle of the production process informs the entire set of requirements, including, for instance, requirements dealing with packaging materials, energy consumption, greenhouse gases, etc., as well as requirements addressing both producers and handlers of agricultural products.

- 37) How will some of the guidelines be measured? For example, one of the guidelines refers to packaging. Are there thresholds that are acceptable vs. unacceptable? I haven't seen a measurable system. Please tell me if I have missed it. Updated January 2009**

The SCS-001 draft standard contains a combination of quantitative metrics and process-oriented requirements. Further discussion of metrics and requirements will be a focus of Standards Committee and subcommittee discussions.

- 38) The draft does not present a START system to measure/assess environmental issues. How would this then be assessed at certification? Updated January 2009**

The SCS-001 draft standard recognizes that a variety of approaches for measuring and assessing environmental performance are in use and may be applicable. This is a subject that will be further discussed by the Standards Committee and appropriate subcommittees.

- 39) It is good to have levels of compliance but it must be clear which these are. Is it 100% Level 1 or 80% Level 1 plus some Non-criticals; prerequisites, critical, sector? It is confusing to the conformity expected. Updated January 2009**

The SCS-001 draft standard provides minimum conformity specifications in Section 3: Level 1 90% conformity including criticals. This will be a subject discussed further by the Standards Committee and appropriate subcommittees.

- 40) In regards to the development of the draft standard, I see the goal clearly stated to achieve “significant environmental and social benefits”. This certainly fits in with two thirds of the current unofficial definition that we are used to: namely that sustainability is environmentally friendly, socially responsible and economically viable. I see no mention in the draft of the need for economic viability. Why? I do not believe that you can be truly successful and inclusive in this process unless this very important element is appropriately included. January 2008**

Economic viability issues are addressed under Section 12.3 of the standard, along with other Community Benefits.



---

**41) Is the intent to establish a voluntary minimum wage that is higher than required by law?**

*Updated January 2009*

The SCS-001 draft standard provisions on fair labor practices, Section 11, state: “The Producer shall pay workers at least the cash equivalent of the national minimum legal wage or a wage that is consistent with local industry standards, whichever is greater. If workers are paid by production, an objective appraisal of the amount of work to be performed shall be conducted as per ILO Convention 100, and the resultant wages shall meet the above requirements [Add. Ref. 6]. An exception shall be made for migrant workers if national wage laws dictate an alternative wage scale, or allow for partial in-kind payments in accordance with ILO Convention 110.”

**42) How does this standard define sustainable agriculture with respect to the percentage of producers it is trying to reach? Is the goal for improvement across as many producers as possible or a select few?** *February 2008*

The SCS-001 draft standard envisions outreach and applicability on a broad, not narrow, basis. However, the subject of goals for improvement among producers is a subject that will be discussed by the Standards Committee and appropriate subcommittees.

**43) What percentage of producers are currently in a position to achieve this standard?** *February 2008*

This percentage has not been determined. Those entities pilot testing the final draft standard will provide insight into how achievable the standard is for producers.

**44) How would the best producers in the United States, with respect to sustainable agriculture practices, stack up against this draft standard?** *Updated January 2009*

Although this question is not specific enough to provide a specific answer, the SCS-001 draft standard acknowledges and is built around current sustainability practices.

**45) Once the standard is in place, who can certify a company? Who will certify if not a third party? Leonardo Academy?** *Updated January 2009*

Certification guidelines are suggested in the SCS-001 draft standard and are expected to be a subject of discussion by the Standards Committee and its work committees. (The draft standard can be downloaded from <http://www.leonardoacademy.org/Projects/SustainAgStdDevelopment.htm>.)

**46) What if we become certified sustainable through a third party organization program before the draft standard becomes approved as a National Standard?** *January 2008, Updated February 2008*

As ANSI standards are voluntary in nature, you are not prevented from pursuing any certification you choose at any time. Once the ANSI standard is finalized, both you and your certification agent will have the opportunity to determine how the existing certification compares. In addition, your selected certifier may seek accreditation to certify against the ANSI standard.

**47) What about Affiliate certifications; i.e., retailers?** *Updated January 2009*

Retailers are included within the general definition of “handler” within the SCS-001 draft standard and can seek certification under the finalized standard.



---

**48) Is the cost of purchasing this standard going to prevent certain entities (i.e., small farms) from applying for certification? (Comment—once we develop the standard with our time, money, and energy, it then becomes the property of ANSI and has to be purchased. Could we instead let each sector purchase only those parts of the standard that apply to them, i.e. breaking up the standard into its component pieces so that it is sector-specific and yet contains all of the key umbrella components?) February 2008**

No. As the copyright holder, SCS does have the right to sell the standard but has already announced its intention to make the standard available at no charge.

**49) Will this certification be marketed at a premium price and the goal to be to drive demand for sustainable products? January 2008**

It is too early to say whether market demand for sustainably produced products will lead to premium pricing. The standard in and of itself does not contain such provisions. The goal of the standard is to help create a common understanding of the principles and practices of sustainable agriculture and, in so doing, to help drive demand for sustainably produced goods.

**50) What implications does the national standard have for US trade/tariffs/negotiations with WTO, etc., if any? February 2008**

WTO rules specifically allow for the development of national standards that are more restrictive to protect the environment of individual countries provided that there are not "technical barriers to trade (TBT)."

**51) In the ANSI Process presentation, it was mentioned that the standard will provide long term growth for US enterprises. Does this mean that the standard may be used as a trade barrier for products from abroad? February 2008**

No. The reference to growth for US enterprises relates to the growing importance of sustainability practices in both the United States' and global agricultural market. A standard for sustainable agriculture practices will clarify what sustainability means within the agricultural sector and will allow agricultural products that are grown and handled sustainably to be more clearly identified. As such, this standard will very likely result in increased commerce of agricultural goods produced sustainably.



---

## **Part C. Sector-Specific Issues**

---

This section provides answers to questions related to sector-specific issues.

- 1) **Will livestock and dairy production be addressed? *January 2008***  
Although the current draft standard does not address livestock or dairy at this time, it will be up to the Standards Committee to determine whether to expand the scope to include such product categories.
- 2) **Why is there a dairy subcommittee and livestock sector-specific annex if these are not included in the standard? *February 2008***  
This list represents suggestions from stakeholders to date and is not a finalized list. The Standards Committee will decide which issues will be addressed within the standard and which subcommittees and/or sector-specific annexes will form as a result.
- 3) **If the Standards Committee decides to include dairy and livestock, how would that be notified to dairy and livestock producers? *February 2008***  
A press release would be issued to national and trade media, an update would be provided to ANSI *Standards Action* for posting, and an announcement would be issued to Leonardo Academy's database of stakeholders.
- 4) **How will this standard affect nursery and floriculture growers? *January 2008***  
Nursery and floriculture growers are covered by the standard. Sector-specific annexes for these sectors have been published as part of the current draft standard.
- 5) **Will VeriFlora be the only organization that will “certify” greenhouse growers? *January 2008***  
VeriFlora is a certification brand owned by Scientific Certification Systems (SCS). SCS is currently certifying greenhouse growers. Other certifiers may ultimately choose to certify against the standard.
- 6) **How can VeriFlora begin to certify just with a draft of SCS-001? *Updated January 2009***  
The SCS-001 draft standard is the basis of VeriFlora certification by SCS. This is as a full-functioning standard in the floriculture sector, with a five-year history of development and application in this sector. It is a draft standard in terms of ANSI development and broader applications.
- 7) **Where/when will nursery crops (trees and shrubs) be addressed? These are not covered by floriculture. *January 2008***  
It is anticipated that the current Potted Plant Annex in the standard will be expanded to encompass trees and shrubs, within the timeframe in which the draft standard achieves final ANS status.
- 8) **How will landscape contracting and retail garden centers be covered? *January 2008***  
These are covered under the handler provisions of the standard.
- 9) **Does forestry/silviculture fall under “wild crops” or “fiber/fuel? *February 2008***  
Forestry is not included within the scope of the current draft standard.
- 10) **Do you anticipate the need to develop crop-specific annexes for all crops covered by this standard? *Updated February 2008***



---

It is anticipated that separate annexes will be developed for specific crops or crop groups. The timeframe for development of such annexes is not fixed or otherwise tied to the timing of the development of the core standard. New annexes may be introduced at any time, pending Standards Committee approval.

**11) Do you think it would be better in terms of sustainability to establish a separate process to develop a standard for sustainable animal agriculture, as that sector is quite different from crop agriculture but is at the same time dependent on crop agriculture? *February 2008***

The SCS-001 draft standard was written to address agricultural crops. However, as stated in the answer to Question 1 of this section, this is a question that should be addressed by, and ultimately can only be answered by, the Standards Committee. That said, the developer of the draft standard does agree with the premise of the question, but that is only one stakeholder's perspective.



---

## **Part D. Additional Comments for Subcommittee Consideration**

This section records comments that have been made for subsequent consideration by the Standards Committee or relevant subcommittees.

- 1) Need to use “substance” and not “chemicals” to remain objective – your terminology now assumes that “chemicals” are bad. Some of the most toxic “substances” are 100% natural, such as arsenic. On the other hand, many “chemicals” are 100% safe. *January 2008*
- 2) It is worth noting that economics is a social science. Sustainability is about taking care of people and taking care of the environment; profitability is covered under social. That is, I think the three-legged stool analogy is not correct. *January 2008*
- 3) The area of economic viability clearly needs further clarification. You referred to inclusion in the category of “social/ economic responsibility” which to most people is certainly different from economic viability. I look forward to assisting in clarifying this area. *January 2008*
- 4) I think there is a need for a Flower & Ornamentals committee. *February 2008*
- 5) It is important to have a subcommittee on Conformity Assessment in order to define clearly the costs for the growers. *February 2008*



---

## Appendix 1

Items posted in January 2008 are responses to questions submitted by the following participants in the December 3, 2007 orientation teleconference:

Andrew Lavigne, American Seed Trade Association  
Andy Jordan, National Cotton Council  
Ben Bolosky, Florida Nursery Growers & Landscape Association  
Betsy Peterson, California Seed Association  
Bill Gerlach, Melissa's  
Carrie Kiplinka-Loehr, Northeastern IPM Center, Cornell University  
Claude Corcos, Toro Micro-Irrigation  
David Ward, Association of Family Farms  
Dean Palm, Green Circle Growers  
Delilah Onofrey, Editor, Greenhouse Grower magazine  
Demie Moore, Aquatrols  
Don Hodge, Agriculture Program, US Environmental Protection Agency, Region 9  
Doug Cole, DS Cole Growers  
Frank Casey, Defenders of Wildlife  
Greg Robertson, Pennsylvania Landscape and Nursery Association  
Greg Wandrey, Pioneer Hi-Bred International, Inc.  
Jacques Wolbert, European Certification Body for the Agricultural Sector  
Jane Earley, Earley & White Consulting Group  
Jason Wadsworth, Wegmans Food Markets  
Jennifer Dassel, Tanimura & Antle  
John Holmes, OFA, An Association of Floriculture Professionals  
Joseph M. DiPaola, Ph. D., Syngenta Plant Health  
Julie Callahan, USDA FAS, Office of Scientific and Technical Affairs  
Karl Hakanson, Protected Harvest  
Kent Bradford, Department of Plant Sciences, University of California  
Laura Stec, Innovative Cuisine  
Lori Berger, California Specialty Crops Council  
Marty Matlock, University of Arkansas  
Matthew Elliott, California Environmental Associates  
Nikki Rodoni, Gills Onions  
Noelle Cremers, California Farm Bureau Federation  
Paul Short, Canadian Sphagnum Peat Moss Association  
Scott Fulton, B&H Flowers  
Terry Humfield, Produce Marketing Association  
Walter Ram, The Giumarra Companies  
Warren Quinn, American Nursery & Landscape Association  
Warren Strauss, Monsanto



**LEONARDO ACADEMY**  
THE SUSTAINABILITY EXPERTS®

P. O. Box 5425, Madison, WI 53705-0425  
328 E. Lakeside St., Suite 201, Madison, WI 53715  
ph. 608.280.0255 fx. 608.255.7202  
[www.leonardoacademy.org](http://www.leonardoacademy.org)

---