



***South American  
Sustainability Conference  
ISCC Technical Committee  
(ISCC TC SA)***

***Su socio en la Sustentabilidad***



September 2014, Porto Alegre, Brasil

*Results of the “Agricultura Certificada” (Aapresid) - ISCC  
Benchmark*

*“Possible implications for farm audits”*





## *What is AAPRESID?*

*Argentina No Tillage Farmers Association (AAPRESID) is a NGO founded in 1989, and it is integrated by farmers and technicians from all over Argentina.*

*Main target is the protection of the main resource for agriculture: SOILS, using the “No Tillage” technology.*

*Today, they have more than 1600 members in 22 regions.*

**“Pushing “No Tillage System” to achieve sustainable agricultural activities (economic, environmental and socially), based on innovation (technological, organizational and institutional), assuming the commitment to interact with public and private organizations to achieve comprehensive development of the Nation\*.”**



*No tillage System*

*Improves soil structure, humidity, organic matter, soil Moisture, regulates soil temperature, reduces the machines work in the field, etc.*

*\*No Tillage is used in more than 93 % of total commercial agriculture area in Argentina (about 26 M hectares).*



*What is “Agricultura Certificada” (Certified Agriculture)?*

*“It is a production process Certification scheme for extensive agricultural and livestock production systems, based in “No Tillage” technologies, through the compliance of a Quality Management System and a set of Good Management Practices and Indicators.”*

## *Agricultura Certificada PRINCIPLES*

*Principle 1: Customers' focus*

*Principle 2: Leadership*

*Principle 3: Personnel's commitment*

*Principle 4: Process focus*

*Principle 5: Management System focus*

*Principle 6: Continuous improvement*

*Principle 7: Decision making approach*

*Principle 8: Mutually beneficial relationships with suppliers*



## ***Components of the AC Scheme:***

***QMS***                      **+**                      ***GMP & Indicators***

### *Quality Management System:*

- *Scope*
- *Quality Policy / Commitment*
- *Balanced Score board.*
- *Mandatory documents and registers (a.e.: Legal verification list; Claims procedure; Training procedure; Employees' files; etc).*

*Good Management Practices:*

- *Good Agriculture Practices*
- *Good Business Practices*
- *Good Environmental Practices*



*Good Business Practices:*

- *Responsible work relationships*
- *Responsible community relationships*





*Good environmental practices:*

- *Water use and conservation*
- *Environment Impact Assessment*
- *Dangerous materials*
- *GHG measurements, monitoring and diminution*
- *Native vegetation conservation*
- *Native wildlife conservation*



## Good Agriculture Practices:

- *No removal / coverage's presence*
- *Crop Rotations: Diversity and Intensity*
- *Balanced Nutrition*
- *Integrated Pest Management (IPM)*
- *Efficient and responsible agro chemicals management*
- *Livestock information Management*



## **Indicators:**

### **Physical:**

- *Texture*
- *Density*
- *Total Porosity*
- *Aeration Porosity*
- *Surface coverage*

### **Carbon:**

- *Carbon Dynamic*

### **Chemical Efficiency:**

- *Phosphorus*
- *Sulphur*
- *Salinity / Sodality*
- *pH*

### **Efficiency:**

- *Efficiency in the use of Water*
- *Efficiency in the use of fossil energy*

Año	Establecimiento	Titular	Ubicación
2010	Campo Amuchástegui	Tecnocampo SA	Monte Cristo, Córdoba
2010	La Lucía, La Bélgica, La Sección, La Juana, La Beba, La Victoria	La Lucía SA	Monte Buey y Wenceslao Escalante, Córdoba. Zavalla y Godoy, Santa Fe
2010	Estancia Caldenes	Caldenes SA	Cañada Seca, Bs As
2010	La Madrugada	Guillermo Cabrini	Arias, Córdoba
2011	La Cautiva y El Suri	Labracero SRL	Isca Yacu, Santiago del Estero
2012	La Ramada, La Colonial.	Hugo Trecco	Corral de Bustos, Córdoba
2012	Don Ricardo, Santa Ramona y otros	Kiñewen SA	Rufino, Santa Fe
2012	Santa María	El Hinojo SA	Crucecitas 3°, Entre Ríos
2012	El Bañado	Sebastián Lance	Tres Arroyos, Bs As
2012	Santa María	El Progreso de Rawson	Rawson, Bs As
2012	Don José	Servicios Agro técnicos	San Francisco, Córdoba
2012	La Claudia y Las Mercedes	Manero SA	Luis Palacios, Santa Fe
2013	El Abuelo	Jorge Lucea	Gonzalez Chavez, Bs As





VS



*AC only audits farms' production*

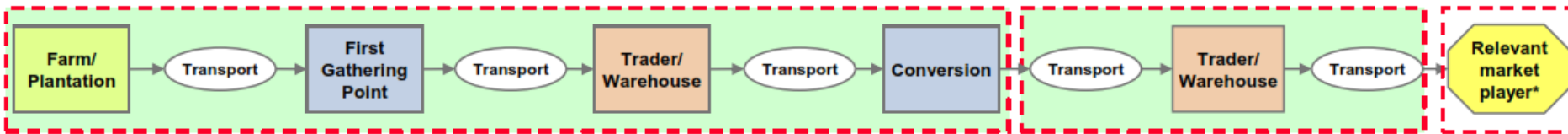
Sustainable Production (Farms) Audit



Chain of Custody Audit



GHG emissions calculation Audit



Production process

Distribution process

### *Amount of ISCC 202 indicators covered by AC scheme*

ISCC Principles	I	II	III	IV	V	VI	Total	%
Total Amount	7	48	12	23	2	3	95	100,00
Fully Complaint	0	24	4	6	2	1	37	38,95
Partial Complainece	4	14	7	10	0	2	37	38,95
No Complainece / Not stated	3	10	1	7	0	0	21	22,11

*21 ISCC EU principles are not covered by Agricultura Certificada*



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## ISCC Major-Must not contemplated by AC

**1.2** “Biomass is not produced on highly bio diverse grassland”: **Nothing is stated about grasslands at AC\***

**1.4** “Biomass is not produced on land that was peatland in January 2008 or thereafter”: **Nothing is stated about peatlands in AC; though at Argentina there are not peat lands in agriculture main area.\***

**1.5** “If areas have been converted after January 2008....”: **Nothing is stated at AC related any data.\***

**2.6.2** “Are fertilizers with considerable nitrogen content only applied onto absorptive soils?”: **Nothing is stated about this at AC.**

**\*RED directive requirements**



vs



## ISCC Major-Must not contemplated by AC

**2.6.8** “The use of raw sewage sludge is not allowed.”: **Nothing is stated at AC.**

**2.9.2** “Do facilities exist for measuring and mixing plant protection products?”:  
**Nothing is stated at AC.**

**2.9.5** “Are all plant protection products stored in their original package?”: **Nothing is stated at AC**

**3.2.3** “Are there procedures dealing with re-entry times on the farm after plant protection products have been applied?”: **Nothing is stated related re entry times at AC.**



ISCC EU v.3			Agricultura Certificada Versión Marzo 2013			
No	Criterion	Major/ Minor Must	No.	Criterion	Level of Compliance (fully/partly/no)	
	The entire land of a farm/ plantation including agricultural land, pasture, forest and any other land must comply with the ISCC Standard 202 (Principle 1 – 6). Selection of fields (“cherry picking”) or partial compliance with the ISCC Stand-ard 202 is not allowed under ISCC	Major Must	5, 6 y 7	6.1.a a.Asegurar el cumplimiento de las normas y/o leyes vigentes. 7.3.3. Conservación de la vegetación nativa. 7.3.4 Conservación de la fauna nativa.	Partly: AC requirements do not cover all ISCC Std.	<b>P</b>
<b>Principle 1</b>						
1.1 (1)	Biomass shall not be produced on land with high biodiversity value	Major Must		7.3.3. Conservación de la vegetación nativa. 7.3.4 Conservación de la fauna nativa.	Partly: AC requirements do not cover all ISCC Std.	<b>P</b>
1.1 (2)	Cultivation and harvest on areas that serve the purpose of nature protection, unless the nature protection aims are not endangered.	Major Must		7.3.3. Conservación de la vegetación nativa. 7.3.4 Conservación de la fauna nativa.	Partly: AC requirements do not cover all ISCC Std.	<b>P</b>
1.1 (3)	Obey the regulations for areas that serve the purpose of the protection of rare, threatened or vulnerable ecosystems or species, or areas for the protection of rare, threatened or endangered ecosystems or species recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature.	Major Must		6.1.a a.Asegurar el cumplimiento de las normas y/o leyes vigentes. 7.3.3. Conservación de la vegetación nativa. 7.3.4 Conservación de la fauna nativa.	Partly: AC requirements do not cover all ISCC Std. Only hunting and trading are stated at AC protocol.	<b>P</b>
1.2.	Biomass is not produced on highly biodiverse grassland	Major Must	NA		<b>No. Nothing is stated</b>	
1.3.	Biomass is not produced on land with high carbon stock	Major Must	6 y 7.3	7.3.3. Conservación de la vegetación nativa. 7.3.4 Conservación de la fauna nativa.	Partly: Argentina Federal Law has several differences with points stated in this point (areas bigger than 10 hectares, since November 27th 2008, deforest is authorized in "green areas"). Also each province has to approve their own law and areas and several provinces still have not do this.	<b>N</b>
1.4.	Biomass is not produced on land that was peatland in January 2008 or thereafter.	Major Must	NI		<b>No, at AC protocol nothing is stated about peatlands.</b>	<b>P</b>
1.5.	If areas have been converted after January 2008, the conversion and use must be in accordance with the requirements of principle 1.	Major Must	NI		<b>No, at AC protocol nothing is stated about any data.</b>	



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## Partially Compliance P1 Examples

**1.3. Biomass is not produced on land with high carbon stock: AC asks only for **native Wildlife/Vegetation conservation** + every Province in Argentina has different protection and deforestation strategies.**

Principle 2				
2.1.1	Environmental aspects are considered if planning buildings, drainage etc	Major Must	7 "7.2 Buenas Prácticas Ambientales"	Partly. Only for big facilities.
2.1.2	Where production of raw material does not interfere with protection purposes (set in Principle 1), appropriate management measures shall be implemented to avoid damage or deterioration of habitats	Minor Must	NI Cumplimiento legal.	<b>No; only legal requeriments</b>
2.1.3	The cultivation of highly invasive species shall be prevented	Minor Must	NI Cumplimiento legal.	<b>No; only legal requeriments</b>
2.1.4	Legitimacy of seed origin	Minor Must	NI Cumplimiento legal.	<b>No; only legal requeriments</b>
2.2.1	Natural vegetation areas around springs and natural watercourses are maintained or re-established.	Minor Must	7 "7.2. Buenas Prácticas Ambientales"; 7.3. Buenas Prácticas Agrícolas"	Fully
2.3.1	Crops should only be grown on suitable soils. In order to ensure a sustainable treatment of soils, good agricultural practices with respect to soil quality, soil contamination and soil ero-sion are addressed in the soil management.	Minor Must	7.4 Buenas prácticas agrícolas: 1) No remoción y presencia de cobertura; 2) Rotación de Cultivos; 5) Nutrición estratégica	Fully
2.3.2	Field cultivation techniques used to reduce the possibility of soil erosion	Major Must	7.3 "7.3.1 No remoción y presencia de cobertura: "	Fully
2.4.1	Soil organic matter is preserved.	Major Must	7.3 "7.3.5 Nutrición estratégica."	Fully
2.4.2	Organic fertilizer is used according to nutritional requirements.	Major Must	7.3.5 7.3.5 Nutrición estratégica	Fully
2.4.3	There is a restriction on burning as part of the cultivation process.	Major Must	7 "7.3.2: Se prohíbe la realización de cualquier tipo de quema de residuos de cultivo, o desechos en todas las áreas del establecimiento a certificar, excepto cuando exista una obligación legal de quemarlos como medida sanitaria."	Fully
2.4.4	Have techniques been used that improve or maintain soil structure?	Major Must	7 "7.3.1 No remoción y presencia de cobertura; 7.3.2: Rotación de Cultivos"	Fully
2.4.5	The use of agricultural by-products does not jeopardize the function of local uses of the by-products, soil organic matter or soil nutrients balance.	Major Must	7 7.3.1. No remoción y presencia de cobertura	Partly. Only related to soil organic matter or soil nutrients balance.
2.5.1	Are mineral oil products and plant protection products stored in an appropriate manner, which reduces the risk of contaminating the environment?	Major Must	7 "7.4.4..... Para ello deberá, en primer lugar, verificar que se cumplan todas las medidas de seguridad en lo que respecta al transporte y almacenamiento de agroquímicos."	Partly. Only for agrochemicals.
2.5.2	Does the producer respect existing water rights, both formal and customary, and can justify the irrigation? Does he follow the local legislation?	Major Must	6.1 y 7.3.1 6.1 Cumplimiento legal, 7.3.1. Uso y conservación responsables de los recursos hídricos	Fully

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<p>Application of good agricultural practices to reduce water usage and to maintain and improve water quality          Good agricultural practices are implemented to reduce the unsustainable water use, the abstraction of unsustainable water sources and to minimize diffuse and localized inputs of chemical residues, fertilizers, erosion or other pollution sources to ground and surface water.</p> <p>2.5.3 Irrigation water should only be abstracted in a way that recharge rates compensate water abstraction. To protect the environment, water is abstracted from a sustainable source. The producer can justify the method of irrigation used in light of water conservation. Timing and amount of irrigation is tailored to crop requirements to meet planned yield and quality levels under local conditions.</p>	Minor Must	<p>7.3.1 Uso y conservación responsables de los recursos hídricos; 7.4.2. No remoción y presencia de cobertura; indicador 2.4 7.4.3. Rotación de cultivos; Indicador 2.4 Eficiencia de uso de agua.</p>	Fully
<p>2.6.1 During the application of fertilizers with considerable nitrogen content care is taken not to contaminate the surface and ground water.</p>	Major Must	<p>7.4 "7.4.5: Nutrición estratégica: "</p>	Partly. Nothing is stated related considerable nitrogen content fertilizers.
<p>2.6.2 Are fertilizers with considerable nitrogen content only applied onto absorptive soils?</p>	Major Must	<p>NI</p>	<b>No. Nothing is stated related considerable nitrogen content fertilizers.</b>
<p>2.6.3 Are complete records of all fertilizer applications available (where, what, how much, date)?</p>	Major Must	<p>7.4. "7.4.4. Manejo eficiente y responsable de agroquímicos "</p>	Partly. Information is required for "agrochemical application" but not specifically for fertilizers. Not all the information is provided.
<p>2.6.4. Fertilizer application machinery allows accurate fertilizer application?</p>	Major Must	<p>7.4. "7.4.4. Manejo eficiente y responsable de agroquímicos "</p>	Partly. Information is required for "agrochemical application" but not specifically for fertilizers
<p>2.6.5. Are inorganic fertilizers stored in a covered, clean and dry area?</p>	Minor Must	<p>7.4 "7.4.4. Manejo eficiente y responsable de agroquímicos "</p>	Partly. Information is required for "agrochemical application" but not specifically for fertilizers. Not all the information is provided.
<p>2.6.6. Are inorganic fertilizers stored in an appropriate manner, which reduces the risk of contamination of watercourses?</p>	Major Must	<p>7.4 "7.4.4. Manejo eficiente y responsable de agroquímicos "</p>	Partly. Information is required for "agrochemical application" but not specifically for fertilizers. Not all the information is provided.
<p>2.6.7. Fertiliser is used according to an input/output balance?</p>	Major Must	<p>7.4 "7.4.5: Nutrición estratégica:</p>	Fully
<p>2.6.8. The use of raw sewage sludge is not allowed.</p>	Major Must	<p>NI</p>	<b>No. Nothing is stated related sewage sludge.</b>

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Assistance with implementation of Integrated Pest 2.7.1 Management systems has been obtained through training or advice.	Minor Must	"7.4.3 Manejo integrado de malezas, enfermedades, insectos y otras plagas:" 7.4.4. Manejo eficiente y responsable de agroquimicos:"	Fully
The producer can show evidence of implementation of at least one activity that falls in the category of "Prevention".	Minor Must	"7.4.3 Manejo integrado de malezas, enfermedades, insectos y otras plagas"	Partly. Not specific.
Can the producer show evidence of implementation of at least one activity that falls in the category of "Observation and Monitoring"?	Minor Must	7.4 "7.4.3 Manejo integrado de malezas, enfermedades, insectos y otras plagas:"	Fully
The producer can show evidence of implementation of at least one activity that falls in the category of "Intervention"	Minor Must	"7.4.3 Manejo integrado de malezas, enfermedades, insectos y otras plagas:"	Fully
2.8.1 Is competent staff dealing with plant protection products?	Major Must	"7.4.3. Manejo integrado de malezas, enfermedades, insectos y otras plagas"; "7.4.4. Manejo eficiente y responsable de agroquímicos".	Fully
2.8.2 Producers only use plant protection products that are registered in the country of use for the target crop where such official registration scheme exists.	Major Must	6.1 Cumplimiento legal, 6.1 y 7.4 7.4.4. Manejo eficiente y responsable de agroquímicos	Fully.
2.8.3 Does the producer follow the label instructions?	Major Must	7.4 7.4.4. Manejo responsable de agroquimicos	Fully
2.8.4 Is all application equipment calibrated?	Major Must	7.4 7.4.4. Manejo responsable de agroquimicos	Fully
2.8.5 Are invoices of registered plant protection products kept?	Minor Must	7.4 7.4.4. Registro de Stocks de agro químicos	Partly. It is not stated that invoices must be kept.
2.8.6 If there are local restrictions on the use of plant protection products, are they observed?	Major Must	7.4 7.4.4. Manejo responsable de agroquimicos	Fully
2.8.7 Have all the plant protection product applications been recorded (where, when, what, how much, why, who)?	Major Must	7.4 "7.4.4. Manejo responsable de agroquímicos"	Partly. Not all the information required.
2.8.8 Is surplus application mix or tank washings disposed of in a way not to contaminate the ground water?	Major Must	7.4 7.4.4. Manejo responsable de agroquimicos	Fully
2.8.9 Application of plant protection products is done appropriately	Major Must	7.4. "7.4.4. Manejo eficiente y responsable de agroquímicos"	Fully

2.9.1	Are plant protection products stored in accordance with local regulations in a secure, appropriate storage? Potential contamination of the ground water must be avoided.	Major Must	7.4 7.4.4. Manejo eficiente y responsable de agroquimicos	Partly. No measures / storage conditions are detailed.	<b>P</b>
2.9.2	Do facilities exist for measuring and mixing plant protection products?	Major Must	NI	<b>No. Nothing is stated.</b>	<b>N</b>
2.9.3	Are there facilities to deal with spillage to avoid contamination of the ground water?	Major Must	7.4 7.4.4. Manejo eficiente y responsable de agroquimicos.	Partly. It is not stated in this way.	<b>N</b>
2.9.4	Is the product inventory documented and readily available?	Minor Must	7.4 7.4.4. Manejo eficiente y responsable de agroquimicos	Fully	<b>P</b>
2.9.5	Are all plant protection products stored in their original package?	Major Must	NI	<b>No, no stated.</b>	
2.9.6	Are liquids not stored on shelves above powders?	Minor Must	NI	<b>No, no stated.</b>	
2.9.7	Will obsolete plant protection products be securely maintained and identified and disposed of by authorised or approved channels?	Minor Must	Ni	<b>No. No stated.</b>	<b>N</b>
2.10.1	Is the re-use of empty plant protection product containers for purposes other than containing and transporting of the identical product is avoided?	Minor Must	7.4 "7.4.4. Manejo eficiente y responsable de agroquimicos	Fully	<b>N</b>
2.10.2	Does the disposal of empty plant protection product containers occur in a manner that avoids exposure to humans and the environment?	Minor Must	7.4 "7.4.4. Manejo eficiente y responsable de agroquimicos	Fully	<b>N</b>
2.10.3	Are empty containers rinsed either via the use of an integrated pressure rinsing device on the application equipment, or at least three times with water?	Major Must	7.4 "7.4.4. Manejo eficiente y responsable de agroquimicos	Fully	
2.10.4	Do the premises have adequate provisions for waste disposal?	Minor Must	NI	<b>No. Not Stated</b>	
2.10.5	Is there a farm waste management plan? Does waste reduction, reuse and recycling avoids or reduces wastage and avoids the use of landfill or burning?	Minor Must	7.3 7.3.2 Gestión del impacto ambiental	Partly. Only for dangerous wastes / residues.	



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## Partially Compliance P2 Examples

**2.5.1 Are mineral oil products and plant protection products stored in an appropriate manner, which reduces the risk of contaminating the environment? :**

**Only for Agrochemicals.**

**2.6.4/2.6.5/2.6.6 Inorganic Fertilizers application Machinery and their storage :**

**There are requirements for the application and storage only for agrochemicals but not for fertilizers.**

**2.8.5 Are invoices of registered plant protection products kept?:** **There is no requirement that says that the invoices must be kept.**

**2.10.5 Farm waste management plan? Waste reduction, reuse and recycling avoids or reduces wastage and avoids the use of landfill or burning?:** **Only reference to dangerous residues**

Principle 3					
3.1.1	Are a written health, safety and hygiene policy and procedures including issues of risk assessment in place?	Minor Must	7.2.1 7.2. Buenas prácticas empresariales 7.2.1 Relaciones Laborales Responsables: (ver 6.3 Protocolo de AC)."	Partly. AC does not ask for a <b>written</b> health, safety and hygiene	P
3.1.2	Are first aid kits present at all permanent sites and in the vicinity of fieldwork?	Minor Must	7.2.1 7.2. Buenas prácticas empresariales 7.2.1 Relaciones Laborales Responsables	Partly. It does not indicate where they	P
3.1.3	Are workers (including subcontractors) equipped with suitable protective clothing in accordance with legal requirements and/ or label instructions or as authorised by a competent authority? Is protective clothing cleaned after use and stored so as to prevent contamination of clothing or equipment?	Major Must	7.2.1 7.2. Buenas prácticas empresariales 7.2.1 Relaciones Laborales Responsables:	Partly. Nothing is said about cleaning and storing of protective clothing	P
3.1.4	Are potential hazards clearly identified by warning signs and placed where appropriate?	Minor Must	7.2.1 7.2. Buenas prácticas empresariales 7.2.1 Relaciones Laborales Responsables:	Partly: Warning signs (permanent and legible) <del>must be present</del>	P
3.1.5	Are records kept for training activities and attendees?	Minor Must	6.3 6.3. Competencia y formación: "	Fully	
3.1.6	Do all workers handling and/ or administering chemicals, disinfectants, plant protection products, biocides or other hazardous substances and all workers operating dangerous or complex equipment as defined in the risk assessment have certificates of competence, and/ or details of other such qualifications?	Major Must	6.3 - 7.2.1 6.3. Competencia y formación". 7.2.1 "Relaciones laborales responsables"	Fully	P
3.1.7	Did all workers receive adequate health and safety training and have been instructed according to the risk assessment?	Minor Must	6.3 - 7.2.1 6.3. Competencia y formación. 7.2.1 Relaciones laborales responsables.	Fully	
3.1.8	Do workers have access to clean food storage areas, designated dining areas, hand washing facilities and free drinking water?	Minor Must	7.2.1 7.2.1 Relaciones Laborales Responsables	Partly. AC only talks about employees who live in the farm.	
3.1.9	Are on site living quarters habitable and have the basic services and facilities?	Minor Must	7.2.1 7.2.1: Relaciones Laborales Responsables	Fully	
3.2.1	Is the accident procedure evident within ten meters of the plant protection product/ chemical storage facilities?	Minor Must	7.2.1 - 7.4.4 7.2.1: Relaciones Laborales Responsables 7.4.4: Manejo eficiente y responsable de agroquímicos	Partly. Nothing is indicated about the distance or place for the	P
3.2.2	Are facilities available to deal with accidental operator contamination?	Minor Must	7.2.1 -7.4.4 7.2.1: Relaciones Laborales Responsables 7.4.4: Manejo eficiente y responsable de agroquímicos	Partly: No specific instructions are given	
3.2.3	Are there procedures dealing with re-entry times on the farm after plant protection products have been applied?	Major Must	7.4.4. 7.4.4. "Manejo eficiente y responsable de agroquímicos"	<b>No: nothing is said about re entry times.</b>	P



vs



## Partially Compliance P3 Examples

3.1.8 Workers have access to clean food storage areas, designated dining areas, hand washing facilities and free drinking water?: **AC only refers to workers who live in the farm**

3.2.2 Are facilities available to deal with accidental operator contamination? **Nothing stated about this in AC**



Principle 4			
4.1. Has a self-declaration on good social practice regarding human rights been communicated to the employees and signed by the farm management and the employees' representative?	Minor Must	NI	No: it is not required at AC Protocol
4.2. Are the equality principles part of the employment conditions?	Major Must	7.2 7.2.1."Relaciones Laborales Responsables	Partly: No specific instructions are given
4.3. There is no indication of discrimination (distinction, exclusion or preference) practiced that denies or impairs equality of opportunity, conditions or treatment based on individual characteristics and group membership or association. For example, on the basis of: race, caste, nationality, religion, disability, gender etc.	Major Must	7.2 7.2.1.Relaciones Laborales Responsables	Partly: No specific instructions are given into the protocol.
4.4. There is no indication of forced labour at the farm. Furthermore, employees shall not be requested to lodge their identity papers with the owner or a third party. Retaining the salary of workers, further property or additional grants is prohibited, unless permitted by law.	Major Must	7.2 7.2.1.Relaciones Laborales Responsables	Partly: No specific instructions are given into the protocol.
4.5. Personnel is treated with dignity and respect	Major Must	7.2 7.2.1. Relaciones Laborales Responsables	Partly: No specific instructions are given
4.6. Do workers have the freedom to join labour organizations or organize themselves to perform collective bargaining? Workers must have the right to organize and negotiate their working conditions. Workers exercising this right should not be discriminated against or suffer repercussions.	Major Must	7.2 7.2.1: Relaciones Laborales Responsables 7.4.4: Manejo eficiente y responsable de agroquímicos	Partly: No specific instructions are given into the protocol.
4.7. Does the farm pay a living wage which meets at least legal or industry minimum standards? Gross wages are paid at least monthly to workers.	Major Must	7.2 7.2.1. Relaciones Laborales Responsables	Partly: No specific instructions are given into the protocol.
4.8. Do the person responsible for workers' health, safety and good social practice and the elected individual(s) of trust have knowledge about and/or access to recent national labour regulations/collective bargaining agreements?	Minor Must	NI	No: it is not required at AC Protocol
4.9. Are all impacts for surrounding communities, users and land owners taken into account and sufficiently compensated for?	Minor Must	7.3. 7.3.2 Gestión del impacto ambiental	Partly: Only if it is required by law.
4.10. Does the management hold regular two-way communication meetings with their employees where issues affecting the business or related to worker health, safety and welfare can be discussed openly?	Minor Must	NI	No: it is not required at AC Protocol
4.11. Is there at least one worker or a workers' council elected freely and democratically who represent the interests of the staff to the management?	Minor Must	7.2 7.2.1. Relaciones Laborales Responsables	Partly: No specific instructions are given into the protocol.

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4.13. Do all children living on the farm have access to quality primary school education?	Major Must	7.2 7.2.1. Relaciones Laborales Responsables	Partly. No specific instructions are given into the protocol.	<b>P</b>
4.14. Are there are records that provide an accurate overview of all employees?	Minor Must	6.3 "6.3 Competencia y Formación"	Fully	
4.15. Are there no minor employees?	Major Must	7 7 "7.2.1.Relaciones Laborales Responsables"	Fully	
4.16. Do all employees are provided with fair legal contracts?	Minor Must	6.3 "6.3 Competencia y Formación"	Fully	
4.17. Does a time recording system show daily working time and overtime on a daily basis for all employees?	Minor Must	6.3 "6.3 Competencia y Formación"	Fully	
4.18. Do the employment conditions of individual workers comply with legal regulations and/or collective bargaining agreements (e.g. on working hours, breaks, rest days, overtime, deductions, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.)	Minor Must	6.3 "6.3 Competencia y Formación"	Fully	
4.19. Do pay slips document the conformity of payment with at least legal regulations and/or collective bargaining agreements?	Minor Must	6.3 "6.3 Competencia y Formación"	Partly. It is a legal requirement in Argentina, but this is not stated as it	<b>P</b>
4.20. Are other forms of social benefits offered by the employer to employees, their families and/or community	Minor Must	NI	<b>No: it is not required at AC Protocol</b>	
4.21. Is mediation available in case of social conflict?	Minor Must	NI Los ministerios de trabajo actuan como tales.	<b>No: it is not required at AC Protocol</b>	<b>N</b>
4.22. Are fair and transparent contract farming arrangements in place?	Minor Must	NI Solo habla de requisitos legales	<b>No: it is not stated at AC Protocol</b>	
4.23. Biomass production does not impair food security	Minor Must	NI	<b>No: it is not required at AC Protocol</b>	<b>N</b>

**P**
**P**
**N**
**N**
**N**
**N**



vs



## Partially Compliance P4 Examples

**4.2 Are the equality principles part of the employment conditions?:** **Not contemplated in AC**

**4.5 Personnel is treated with respect and dignity:** **Not contemplated in AC**

**4.9 Are all impacts for surrounding communities, users and land owners taken into account and sufficiently compensated for?:** **Only if Argentinean law requires.**

**4.13 Childrens living in the farm have access to school?** **No instructions given in AC**

Principle 5			
5.1. Can the producer prove that the land is used legitimately and that traditional land rights have been secured?	Major Must	7.1.2 7. Buenas prácticas empresariales 7.1.2 Relaciones Responsables con la comunidad.	Fully
5.2. Is there awareness of, and compliance with, all applicable regional and national laws and ratified international treaties?	Major Must	6.1.a 6. Responsabilidad del productor.	Fully
Principle 6			
6.1. Is a recording system established for each unit of production. These records must be kept in an ordered and up-to-date condition for at least 3 years?	Major Must	"5 Alcance"; "5.2 Requisitos de documentación 5.2.1 Generalidades." "6.2 Planificación del SGC"; "6.4 Revisión del SGC"; "8.1 Seguimiento y medición"	Partly. Nothing is stated about documents' time conservation.
6.2. Are records kept for the description of the areas in use?	Major Must	5.2.1. c Contiene una descripción estática de las 5 características de el o los predios dentro del Alcance del SGC.	Partly. At AC, information required at 4.6.2.2 is not indicated as strongly as at ISCC
6.3. Do subcontractors comply fully with the ISCC standard?	Major Must	5 "5.1 Requisitos generales"	Fully



vs



## Partially Compliance P6 Examples

**6.1 Is a recording system established for each unit of production. These records must be kept in an ordered and up-to-date condition for at least 3 years?:** Nothing is stated about keeping records time lapse in AC.

**6.2 Are records kept for the description of the areas in use?:** There is a static description of the Farm (Geocoordinates, sketch of the infrastructure in the farm, maps, etc.). Not so many records as asked in ISCC EU.





vs



### *Amount of ISCC 202 indicators covered by AC scheme*

ISCC Principles	I	II	III	IV	V	VI	Total	%
Total Amount	7	48	12	23	2	3	95	100,00
Fully Complaint	0	24	4	6	2	1	37	38,95
Partial Complainece	4	14	7	10	0	2	37	38,95
No Complainece / Not stated	3	10	1	7	0	0	21	22,11

*21 ISCC EU principles are not covered by Agricultura Certificada*

## Differences in Governance

ISCC EU			Agricultura Certificada
No	Criterion	Checkpoint	Checkpoint
<b>Reliability and transparency of the certification scheme</b>			
101	Management des Systems	Day to day business managed by ISCC System GmbH, which is controlled by Executive board ISCC Executive Board is delegated by Board, which represents all stakeholders and which is elected annually in the General Assembly	Day to day business managed by AAPRESID (Asociación Argentina de productores en Siembra Directa) It is Public Voluntary Organization integrated by farmers. Main objective of Aapresid is to develop and communicate the advantages of the use of "Non Tillage" techniques.
101, 202	Stakeholder integration during development, continuous improvement, audit, Possibility for stakeholder participation	Multi-stakeholder system, governed Open to all kinds of stakeholders Public Consultation on new documents Stakeholders and interested parties part of auditing	Open to farmers or technicians
101	Multi stakeholder board	6 board members representing the stakeholders of three different groups: Agriculture and Conversion, Trade Logistics & users and NGOs, Social, Research and others.	12 board members representing different regions.
101	Description of the system authorities and decision making processes		
	Transparency in reporting	<ul style="list-style-type: none"> <li>Access to</li> <li>- certification documents,</li> <li>- procedures,</li> <li>- fees and tariff structure</li> <li>- certificates (including Blacklist) and further information regarding the certified site,</li> <li>- audit reports (on a voluntary basis) as well as</li> <li>- appeals and arbitration process</li> <li>- Transparent description of rights and duties of companies</li> </ul>	<ul style="list-style-type: none"> <li>Access to</li> <li>- certification documents,</li> <li>- procedures,</li> <li>- fees and tariff structure</li> <li>- certificates (including Blacklist) and further information regarding the certified site,</li> <li>- audit reports (on a voluntary basis) as well as</li> <li>- appeals and arbitration process</li> <li>- Transparent description of rights and duties of companies</li> </ul>

Requirements on certification bodies and auditors		
251, 4.1.1	<p><b>Requirements on the certification body</b></p> <p>Certification bodies have to fulfill the following requirements:</p> <ol style="list-style-type: none"> <li>(1) Recognition by a national public authority or an accreditation body (being member of the International Accreditation Forum or having a bilateral agreement with the European Co-operation for Accreditation)</li> <li>(2) Conduct audits in conformity with standard ISO 19011 establishing guidelines for quality and/or environmental management systems auditing</li> <li>(3) The workflow of the certification process complies with the requirements of ISO Guide 65 (EN 45 011)</li> <li>(4) Conduct audit and certification according to the principles and requirements of ISO 17021: 2006</li> <li>(5) Signed Cooperation Agreement with the ISCC System GmbH</li> <li>(6) Appointment of competent employees in terms of the requirements in this document</li> </ol>	<p>Certification bodies have to fulfill the following requirements:</p> <ol style="list-style-type: none"> <li>(1) Recognition by RTRS [ a) Recognition by a national public authority or an accreditation body (being member of the International Accreditation Forum or having a bilateral agreement with the European Co-operation for Accreditation); b) Conduct audits in conformity with standard ISO 19011 establishing guidelines for quality and/or environmental management systems auditing; c) The workflow of the certification process complies with the requirements of ISO Guide 65 (EN 45 011); d) Conduct audit and certification according to the principles and requirements of ISO 17021: 2006]</li> <li>(5) Signed Cooperation Agreement with the Agricultura Certificada - Aapresid System</li> <li>(6) Appointment of at least one lead auditor / competent employees in terms of the requirements in AC</li> </ol>
251, 4.1.2	<p><b>Independency of auditors</b></p> <p>Auditors must be independent of the activity being audited, free from conflict of interest,</p>	<p>Auditors must be independent of the activity being audited, free from conflict of interest</p>
251, 4.1.2.1	<p><b>General Qualification of auditors</b></p> <ol style="list-style-type: none"> <li>(1) At least 2 years work experience in the relevant work area, all in all, at least 3 years work experience</li> <li>(2) At least 40 h audit training (e.g. according to ISO 19011)</li> <li>(3) Four complete audits for a total of at least 20 days of audit experience as an auditor - training under the direction and guidance of an auditor competent as an audit team leader. The audits should be completed within the last three consecutive years</li> <li>(4) At least 20 days of audit experience as a trainee under the direction and guidance of an auditor competent as an audit team leader. The audits should be completed within the last three consecutive years</li> <li>(5) Three complete audits for a total of at least 15 days of audit experience acting in the role of an audit team leader under the direction and guidance of an auditor competent as an audit team leader. The audits should be completed within the last two consecutive years</li> <li>(6) Knowledge in handling and evaluation of data sources</li> <li>(7) Personal aptitude in the sense of ISO 19011:2002</li> <li>(8) Auditors should comply with the requirements of the ISAE 3000 when performing an ISCC audit.</li> <li>(9) The auditor should plan and carry out the audit with respect to nature, timing and extent of evidence gathering procedures in such a way that a meaningful level of assurance for a</li> </ol>	<ol style="list-style-type: none"> <li>(1) University Degree in Agriculture.</li> <li>(2) Lead auditors at least 37 h audit training (ISO 9000, 14000, 6 OHSAS 18000) or at least 24 h audit training (ISO 19011)</li> <li>Farm auditors: at least 8 h audit training as internal auditor / QS (ISO 9000)</li> <li>(3) For Lead auditors: At least Three (3) complete AC audits as an auditor - training under the direction and guidance of an auditor competent as an audit team leader; or at least Three (3) complete certification audits as Lead Auditor for other equivalent schemes as RTRS, RSPO, ISCC, Global GAP or ISO 14001.</li> <li>(4) For farm auditors: At least Three (3) complete AC audits with a minimum of seven (7) days of audit experience as a trainee under the direction and guidance of an auditor competent as an audit team leader; or at least Three(3) complete certification audits as auditor for other equivalent schemes as RTRS, RSPO, ISCC, Global GAP or ISO 14001</li> <li>(5) Participation (and pass examination) in an "Agricultura Certificada" basic training</li> </ol>
251, 4.1.2.2	<p><b>Auditors on farms</b></p> <p>University degree or technical college decree or comparable qualification in one of the areas:            Ad (1): agriculture, agricultural economics            Ad (2): Agrolology, geology, geological sciences, geoecology, landscape ecology, life sciences, etc            Ad (3): Biology, botany, ecology, landscape ecology, natural sciences, life sciences et al.            Ad (4): process technology, energy management, environmental engineering, environmental engineer, environmental and quality management, environmental orientated process engineering, renewable energies, GHG training</p>	<p>University degree in agriculture.</p>
251, 4.1.2.2	<p><b>Auditors in the Chain of Custody and GHG</b></p> <p>University degree or technical college decree or comparable qualification in one of the areas:            Ad (1): Mass balance methodology and traceability, traceability, logistics, logistics management            Ad (2): process technology, energy management, environmental engineering, environmental engineer, environmental and quality management, environmental orientated process engineering, renewable energies, GHG training</p>	<p>NI</p>
	<p><b>Performance control of auditors and CBs</b></p> <p>Within ISCC done by Integrity management</p>	<p>NI</p>

Requirements on audits		
	Standardized, mandatory procedures for the audit	ISCC has procedures for farm/plantations, first gathering points, conversion units, traders and warehouses and specified procedures for waste and residues
		AC has a procedure / standard for farm / cattle production.
207, 252	Risk assessment and management	Risk management of farmers based on distance to Principle 1 areas. Defines the intensity of audit and the sampling (3 different risk levels: High, Medium, Regular) Risk management of supply chain elements based on management structures of company. Defines the intensity of the audit (3 different risk levels: High, Medium, Regular)
		All farms must be assessed.
	Type of certification	Individual certification. Farms/plantations can also be certified as a group or as a supplier basis of a First Gathering Point
		Individual certification.
252, 4.2,	Certification frequency, Surveillance audits	Validity of ISCC certificate is one year. An annual ISCC certification audit takes place Surveillance audits in case of reasonable suspicion
		Validity of the certificate is three ( 3 ) years with annual revisions.
252, 4.2., 4.3.	Type of the audit (on-site, desk audit), Audit intensity	On site audit, Audit intensity based on risk factor
		Desk + On site audit.
202	Level of compliance	Farmer: All Major Musts and 60% of Minor Musts Supply chain: All criterion are counted as Major Musts
		NI
202, 203	Handling of Non-conformities, Mechanisms for sanctions	Farms: Violation of Principle 1: Exclusion from certification Violation of Major Musts: Non-conformities to be corrected within 40 days timeframe. If not compliant within 40 days: audit needs to be repeated In case of group certification: Doubling of
		Mayor Non conformity: Non-conformities to be corrected within 30 days timeframe. If not compliant within 30 days: audit needs to be repeated



## ***Final Consideration***





## Considering that:

- 1. The ISCC program recognizes other voluntary schemes.*
- 2. Under the voluntary scheme ISCC, in order to ensure the monitoring of sustainability characteristics in production chains of biomass, main sustainability information must be checked (on site).*

## We believe:

1. *Recognition of farms certified under “Agricultura Certificada” Scheme (AC) could be reached by ISCC.*
2. *Auditors should verify the fulfillment of those indicators not contemplated by AC, beginning by those classified as “Must/Majors” by ISCC.*
3. *Additional information is required also for those indicators with partial compliance*

# Muito Obrigado!

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