

COFFEE SUSTAINABILITY REFERENCE CODE

SYNOPSIS OF THE PUBLIC CONSULTATION RESULTS | October 2021

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INTRODUCTION

The Global Coffee Platform (GCP) thanks all stakeholders for their participation in the public consultation on the revision of the Coffee Sustainability Reference Code (previously known as Baseline Coffee Code). The consultation took place from 1 March to 30 April 2021 with approximately 800 stakeholders participating via webinars, workshops, email and the online survey and contributing with over 1,100 comments. This document presents an overview of the consultation process and participation, and summarizes the input received during the public consultation. This input informed the development of the final draft that was put forward for approval by the Board of GCP, the multistakeholder and highest decision body of the Association.

Summary:

- o The number of stakeholders that participated in the revision confirmed the great interest in the Code revision.
- Input received was diverse in terms of participation from origin countries and representatives of mainstream actors across in the coffee sector.
- Stakeholders expressed overall endorsement of the proposal. At the same time, rich input was shared either via general recommendations or concrete suggestions to improve the Code.
- The lack of Principles/Practices/Measures addressed to other actors in the coffee supply chain beyond production and primary processing was identified as a main gap in the proposal.
- The main topics that needed further refinement are continuous improvement, farmer's prosperity, gender and youth, pesticides lists and deforestation.
- o A survey carried with smallholder farmers in Uganda showed that while the concept of sustainability may not be fully understood by farmers in the sample, there is a large number of practices that are said to be implemented by the farmers, in particular with the hope that productivity and financial benefits from coffee production will improve.

Consultation process and participation

The public consultation took place during 1 March to April 2021. Three global webinars were carried out to introduce the proposed changes and were followed by workshops and further webinars in coffee producing countries to discuss the proposals in further detail. An online survey with 14 questions was open to all stakeholders during the consultation period, and translated into Bahasa Indonesian, Portuguese, Spanish and Vietnamese.

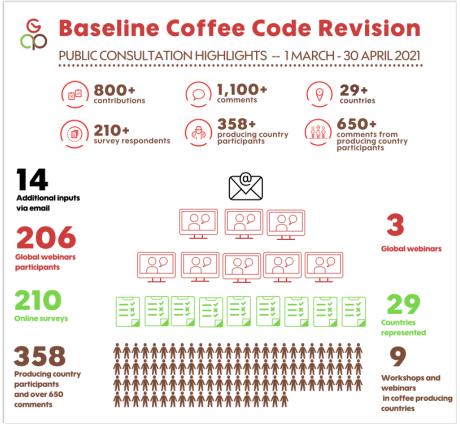
Outreach in coffee producing countries: A particular effort was made to gather the views of stakeholders in origin countries. Physical workshops were carried out where social distance rules allowed, as well as virtual workshops. A survey with 39 smallholder farmers was carried out in Uganda, exploring to what extent the Code is understood and relevant for their coffee operations.

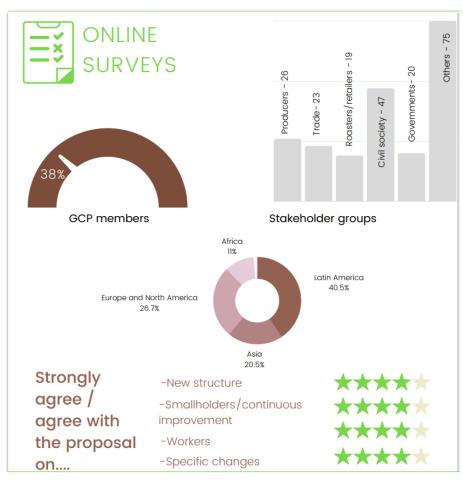
Online survey: 210 stakeholders participated in the online survey. 14 questions were included covering: the new structure, approach to continuous improvement, smallholders and workers, and whether the revision met its objectives. Also, questions on specific changes were raised, and finally a space for additional comments was provided.

Regarding the distribution per stakeholders' groups, the category "others" included stakeholders from intergovernmental organizations, trade associations, consultants, researchers and crop protection companies.

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Consultation results

The results are presented by topic and when relevant, as the input was received via multiple channels, the source of the input is explicitly mentioned.

General comments

Overall, the stakeholders expressed their support for the proposal and the new structure. The proposed Code was considered more accessible and easier to understand than the current one. Stakeholders also found valuable to have an updated sector wide reference for baseline sustainability that considers the trends and developments of the last years.

The following topics were highlighted as areas for improvement:

Scope: A large number of stakeholders highlighted the need to go beyond the current scope of the proposal (production and primary processing). This topic was raised in all workshops at origin as well as via the online survey. Many stakeholders agreed that sustainability, as a shared responsibility, cannot pass all the responsibility only to producers, and suggested that the Code also should also cover downstream actors. Connected to this point, the lack of incentives for producers to implement these baseline practices was mentioned as a weakness of the proposal. Some stakeholders expressed their wish to see more emphasis on the topic of living and prosperous income.

Continuous improvement: While the advantages of having a flexible framework were appreciated, several stakeholders highlighted the need to articulate the expectation on continuous improvement more clearly, in particular regarding the practices that are not considered critical. Without time-bound plans and their monitoring, it was perceived that change and improvement would not happen.

Critical Practices: Different stakeholders, depending on their role in the coffee sector, made recommendations to increase the number of Critical Practices and wished to know how the ones selected were chosen. The following topics were suggested by different stakeholders as Critical Practices: compliance with national legislation, all Business Management Practices, business ethics and traceability, land and water rights, all human rights, all requirements regarding workers, no discrimination and harassment, gender based violence, access to water and housing/accommodation, waste and hazardous waste. It was mentioned that the practices regarding

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continuous improvement should be the exception and not the other way around. It was also suggested that all Practices should be deemed critical.

Smallholders: It was acknowledged by many stakeholders that while most of the practices are applicable to smallholders, their ability to implement them varies and is affected by many factors including but not limited to the context. It was also shared that since smallholders represent the vast majority of coffee producers, the Code should focus on them. Finally, it was noted that it was difficult to develop practices tailored to smallholders given the diversity that exists across countries and contexts of smallholder realities. Additional feedback was received on practices that seemed not applicable to individual smallholders, in particular those that are connected with employment of hired labour.

Workers: While the overall approach to workers was endorsed, some stakeholders highlighted the advantages of further defining which kind of Practices/Measures or Expected Results are applicable to which kind of workers. Some mentioned the need to introduce Measures/Expected Results that could increase the protection of workers from being infected with Covid-19.

Communications: There is a need to convey more clearly that the Code is a reference framework for baseline sustainability and not a certification standard. Also, there were some concerns raised that the market may confuse a reference to baseline sustainability with a holistic/all-encompassing concept of sustainability and that there may not be any incentives to go beyond what the Code is proposing. A change in name was suggested to convey better the nature of the Code, as well as increased efforts to express the added value and how it supports existing sustainability standards.

Economic dimension

Groups: Various stakeholders suggested to strengthen requirements related to group management, including for example risk assessments and internal management/monitoring systems, and the importance of individual farmers to organize collectively to be able to better negotiate in the supply chain.

Traceability: Various comments pointed at the importance of this topic and needed to have further clarity on the Practice on traceability. To further explain until where the traceability is required (individual farmers or groups) as well as to the need that traceability covers all the supply chain.

Single comments were received to include the following topics in the Code: financial inclusion, digital payments, training on hedging/access to hedging, access to funding, micro-finance, diversification into tourism, technological solutions for smallholders, land registry.

Social dimension

Gender: Several stakeholders noted that gender was weak in the proposal and that the current proposal (topic Community) was not sufficient. It was recommended to embed gender across all areas of the Code and that the language should be more explicit to include women. The introduction of a gender analysis was also suggested.

Youth: Similar to the comments received on gender, it was highlighted that the proposal did not explicitly mention youth (as farmers and workers) and how to engage young people in coffee production.

Some stakeholders highlighted the importance of humans right due diligence and the need for a proactive component for group management (including risk-assessment, monitoring and remediation) so it could assess and address any malpractices identified. The need to introduce a grievance mechanism was also mentioned.

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Environmental dimension

Deforestation: The online survey included two questions on deforestation. One asked whether a reference date should be included in the measure on "no deforestation". 55% of respondents said "yes", 22% where unsure, 13% did not provide a response, and 11% said "no". There was less agreement on which should be the reference date, which was the topic of the second question. 33% said "2014", 33% did not respond, 19% said "other" and 16% said "2006". In the comments, various respondents suggested to align with the approach of the Accountability Framework Initiative, and that each scheme should decide and make public their reference date. Other stakeholders suggested to harmonize the dates with national legal frameworks and that deforestation should be allowed if it is permitted by national law. Some respondents highlighted the complexity of assuring compliance if the cut date is before 2014 and others the importance to align with EU legislation on deforestation. The need to include a definition of "natural forests and ecosystems" was noted.

Pesticides lists: Several stakeholders, in particular from Brazil, raised concerns about the proposal, as in their view it was focusing too much on toxicity (i.e. ban of active ingredients) and not enough on handling, suggesting a greater focus on Integrated Pest, Disease and Weed Management. The lack of alternatives and the economic viability of farming without those pesticides was considered as an important factor in deciding which pesticides to prohibit and/or phase out. The governmental process of approval of pesticides was considered to be rigorous and sufficient, and the inclusion of pesticides that are allowed in producing countries was raised as a concern. Apprehension about the prohibition or phase-out of particular active ingredients was raised and information to encourage their continuation was shared. Also, the use of some of the existing criteria to classify the pesticides was seen as problematic. Other stakeholders suggested that the phase out should include a time-bound plan. Moreover, it was noted that the Pesticides Lists should be a live document with regular updates. Also, the wish was expressed to see GCP taking a more proactive role in sharing information along the coffee supply chain and a stronger advocacy role on behalf of farmers regarding changes in legislation in consuming countries.

Climate change: Various stakeholders expressed that the Measure/Expected Result to document Greenhouse Emissions was seen as unrealistic, in particular for smallholders. This is due to the lack of common agreed methodologies for all production systems and the level of expertise required to gather this information.

Single comments were received on pollination and the importance to allow GMOs.

Other topics

Local laws: Across the different dimensions, different views regarding the reference of the proposal with national legislation were shared. Either by acknowledging that in particular for smallholders, compliance with legal and regulatory requirement was: i) a challenge (e.g. Principle 3.1 on compliance with relevant legal and regulatory requirements), ii) not feasible under some circumstances (Principle 3.2 on legal rights to use the land), iii) not sufficient for a code that wants to express a concept of sustainability in the market (e.g. Measures/Expected Results in the social dimension that do not go beyond human rights or legal compliance) or iv) sufficient and further Measures/Expected Results were not necessary (e.g. Principle 9.3 on choice of pesticides or deforestation).

Equivalence Mechanism: The connection of the Code and the Equivalence Mechanism and the National Sustainability Curricula was brought up by some stakeholders. Various actors asked whether national companies would be eligible to be recognized as equivalent to the Code. It was also highlighted that more clarity is needed to express that schemes considered equivalent to the Code are not equivalent to each other. Finally, it was suggested that GCP makes public the assessments of the schemes that are considered as equivalent to the Code. It was also noted that the Equivalence Mechanism should be an integral part of the Code, and not a separate piece as even if the Code is not an operational standard, it is operationalized through other standards/programs.

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National Sustainability Curricula: The importance of considering the Code in the development of National Sustainability Strategies was highlighted in various workshops in origin countries as well as the need to clarify any divergencies between the Code and National Sustainability Curricula.

Coffee Data Standard: Various stakeholders wanted to understand better how the Code connects to the Coffee Data Standard and Sustainability Progress Framework and to reporting in general. It was highlighted that there is an opportunity now with the revision of the Code to relaunch the efforts on aligned reporting on key metrics.

Other practices: food security, diversification of income, post-harvest handling, transportation and storage, access to water were mentioned as missing elements in the proposal.

Nomenclature: The term "Measures" in the proposal did not resonate with some stakeholders and the term "indicators" was suggested instead.

Glossary and guidance: The need to provide further clarity on terms used was signalled, including terms such as: smallholders, natural forests and ecosystems, living wage, resilience, reliable information, marginalized groups, minimization of risks, appropriate housing, awareness. The need to elaborate on further guidance on topics like Good Agricultural Practices and Integrated Pest Management was also highlighted.

Finally, many suggestions to improve the wording of the different Principles/Practices/Measures across all dimensions were received. We thank all stakeholders who took the time to share their knowledge, experience, ideas and suggestions.

Results of interviews with smallholder farmers in Uganda

As part of the public consultation Café Africa Uganda carried out a brief survey amongst smallholder farmers in Uganda to find out to what extent the Code is understood and relevant for their coffee operations. The interviews took place alongside a coffee sustainability training, before the actual training took place. 39 smallholder farmers (21% female) were interviewed in two venues (Arabica zone of Mount Elgon and Robusta zone in Central Uganda). Smallholder coffee farmers in Uganda practice a mixed farming system in which coffee is not always the main commercial crop. 11 interviewees were commercial farmers, 13 were improved farmers and 15 were traditional farmers. To test to what extent the Code practices were internalised amongst the interviewees, the interviewees were requested for each of the 39 practices under the 3 dimensions to what extent they were aware of the practice, whether it was relevant, they implemented it, or planned to implement. The main results of the survey are:

- No interviewee understood the sustainability concept in its full context. The vast majority (92%) of farmers
 mentioned only aspects of the economic dimension, one interviewee mentioned only aspects of the
 environmental dimension and two farmers mentioned aspects of the economic and social dimensions. It is
 likely that for the wider smallholder coffee farming community, who are not exposed to sustainability
 training at all, the sustainability conceptual framework is largely absent.
- 10% of the Code practices are unknown, and 74% are claimed to be implemented by the interviewees. The least known practice is GMO free coffee, followed by reducing fossil fuels use, and agrochemical application standards. The access to training and information, biodiversity conservation and good agricultural practices are being implemented extensively. In fact, Code practices relating to GAPs, pest and disease management and soil and water conservation are generally well known and implemented. GMO free practices are not known as Uganda does not have GMO coffee. From the discussions with farmers during the interviews, it appeared that the full meaning of some of the Code practices, even if they are claimed to be followed, is not well understood, or translated into very practical productivity practices. For example, aspects around workers' rights, working hours and written instructions, are generally largely unknown to be part of the sustainability framework. The survey showed some slight differences between Arabica and Robusta growers,

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in their knowledge and interpretation of the Code practices. For example, the Arabica coffee areas understand traceability better, because it is more widely applied for Arabica than Robusta.

- On questions on how coffee growers could benefit from the coffee code, 51% of the respondents hope that
 they will benefit through increasing productivity of their coffee while 46% consider the financial benefits
 from the Code more important. Interestingly, because of a more ready and better market for Arabica coffee,
 Arabica growers find continuous improvement of productivity of prime importance, whereas Robusta
 growers find market access and transparent pricing more important.
- On the question about how a general coffee code should be enforced/promoted, the majority of the respondents mentioned that this should be done through farmers' training. The use of community agents, buyers and government were mentioned far less, although farmer training would most likely take place through one of those agents. In the Arabica growing region enforcement by buyers was more considered than in the Robusta areas. The existence of many private partners in the Arabica growing area coupled with their close contact with farmers could partly explain why farmers prefer enforcement by buyers and other non-governmental measures.



Graphic recording in one of the workshops during the consultation (March 2021).