

Comparative Analysis of the Main Environmental and Social Certification Programmes in the Banana Sector

Background document for discussion at the *Ad-hoc* Expert Meeting on Responsible Banana Production and Trade

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Glossary

- BBP: Better Banana Project of Rainforest Alliance
- CAN: Conservation Agriculture Network
- CAR: Major Corrective Action Request in SA 8000
- CEEPA: Council on Economic Priorities Accreditation Agency
- EPA: Environmental Protection Agency
- ETI: Ethical Trading Initiative
- FAO: Food and Agriculture Organisation
- FLO: Fair Trade Labelling Organizations International
- ICM: Integrated Crop Management
- IFOAM: International Federation of Organic Agricultural Movements
- ILO: International Labour Organisation
- IOAS: International Organic Accreditation Service
- IPM: Integrated Pest Management
- ISEAL: International Social and Environmental Accreditation and Labelling Alliance
- ISO: International Standards Organisation
- IUCN: International Union for Conservation of Nature and Natural Resources
- NGO: Non-Governmental Organisation
- RA: Rainforest Alliance
- SAI: Social Accountability International
- UNEP: United Nations Environmental Programme
- WHO: World Health Organisation

Executive Summary

A number of voluntary initiatives have been developed by non-governmental organizations (NGOs), trade unions and companies to promote banana production, trade and consumption based on social and ecological principles and which involve monitoring, certification, labelling and codes of conduct. These initiatives include:

- The Fair Trade Labelling Organizations International (FLO) program to promote fair trade for disadvantaged producers in developing countries,
- The Rainforest Alliance's Better Banana Project (BBP) supports ecologically and socially preferable banana production,
- Organic production and certification systems through the International Federation of Organic Agricultural Movements (IFOAM), to ensure that bananas are grown without the use of agrochemical and in what is considered a holistic manner.
- The UK based Ethical Trading Initiative (ETI) is exploring how companies can test and monitor labour and social conditions in the workplaces of their suppliers. One of its pilot projects is focusing on bananas in Costa Rica.
- Social Accountability International (SAI), formerly Council on Economic Priorities Accreditation Agency (CEEPA), and their Social Accountability Standard SA 8000, which has been used to promote ILO conventions of social justice and labour conditions.

While these various initiatives do address unique issues and target different actors in banana production and trade worldwide, there is substantial possible overlap that needs to be considered. Potential problems resulting from this overlap include consumer confusion, the additional costs to producers generated by multiple inspections and certifications, different and incompatible demands from supply chain clients as well as the duplication of efforts and the fact that there are limited resources available to set up and run these various initiatives.

This study examines the main certification programmes in the banana sector mentioned above. As the report is divided into three sections, the executive summary will follow this structure, including General Principles and Objectives, Monitoring and Control, and Standards. The Standards section, comprising the bulk of the report, is sub-divided into environmental, social and economic-institutional criteria. Finally, the prospects for further convergence between the certification programmes will be examined.

General Principles and Objectives:

One of the fundamental similarities in the **basic principles, values and philosophies** of all the initiatives is the perception of a need for change in current economic practices. Even though this is achieved from different points of view, i.e. environmental, commercial, and social, this is a commonality that links all initiatives.

Both social and ecological principles are included in FLO and BBP standards. FLO tends to put more emphasis on the social aspects, while instead BBP focuses more on the ecological aspects. On the other hand, both SA8000 and ETI concentrate solely on the social aspects of production and on working conditions. IFOAM aims to promote organic agriculture and as a consequence its objectives are primarily environmental.

It should be underlined that ETI is established as a learning initiative to explore how to monitor compliance with a code of conduct in companies.

In terms of the **beneficiaries** a main distinction is that FLO has specific content criteria for small-producer organizations primarily dependent upon family labour as well as different criteria specially tailored for plantations dependent upon hired labour, both being in a disadvantaged and marginal position with respect to local and international markets. For all other initiatives the standards are the same regardless of scale of operation and type of company. However, the inspection and certification processes take these characteristics into account to some extent.

One further distinction is the **geographic scope** of the different initiatives. Both SAI SA 8000 and IFOAM standards are applicable worldwide, while the BBP and FLO's banana standards apply in tropical or developing countries. The ETI is an initiative based in the UK, although suppliers can be located anywhere in the world.

Monitoring and Control

A main objective of all the initiatives, but ETI, is the development and refinement of standards enforced by a verification system, whose duty is to carry out inspections and certifications or inscription.

As for ETI, all these aspects are mainly possibilities that need to be tested and will be assessed through the above-mentioned pilot projects. ETI does not certify; the projects are aimed at learning about monitoring and progressive improvement of the skills and knowledge required for the development of a certification program. This does not necessarily imply that ETI will develop into a certification programme.

SA 8000 and IFOAM play the role of **accreditation agencies** with criteria for accrediting certification agencies that will evaluate applicants against certain standards. In the case of SAI, this standard is the SA 8000 that verifies management systems for better workplace conditions. IFOAM's standards are standards for standards; in other words, they are not to be directly inspectable but are to be incorporated into the standards of each accredited certification body and expanded upon.

The BBP is managed by a coalition of independent, non-profit, local conservation groups – The Conservation Agriculture Network, or CAN. The CAN is co-ordinated by the Rainforest Alliance, which ensures that all member groups use the same certification standards and protocols and reporting procedures. The RA manages a centralized certification administration system and a training program that auditors must complete in order to be accredited by the programme.

FLO is currently re-organizing the certification process. They plan to set up, starting from 2002, a separate Certification Unit with its own manager, a cross-product Standards and Policy Working Group and, more generally, certification functions and procedures will be harmonized and separated from producer support and business facilitation activities.

In all programs the **certification process**, whether performed by the same body or through accredited certifiers, follows the same basic steps for application: submission of documents, site visit and inspection of facilities, production sites and records, report of inspection and a certification decision-making process plus provisions for

periodic review. This review is normally done once a year except in the case of SAI where a full audit takes place every three years with surveillance audits every six months. During the inspection, certain initiatives require input from external stakeholder groups. In the case of BBP, the main external stakeholders are local communities. For SAI they are NGOs and trade unions, while ETI also adds workers and business.

Of note, IFOAM's accreditation criteria for certification are the most comprehensive as they deal with the need for clear recording and communication between parties and for clearly stated reasons in the event that certification is denied. SAI has a two-tiered system of participation: SA 8000 Signatory Member program aimed at retailers and at companies that do a substantial amount of sourcing from suppliers and SA 8000 certification by accredited bodies for manufacturers and suppliers (facility based). SA 8000 members must define the scope of application and commit to goals for having production units (whether their own or independently operated) achieve SA 8000 certification within a specified time period.

In terms of **flexibility in the certification** (and accreditation) process, this is shown in different ways. For BBP, SA 8000 and FLO flexibility means committing to continual improvement. In BBP, certification takes place once the majority of standards have been met and the farm manager has an approved work plan for continued improvements. In FLO, criteria are divided into minimum criteria, to be met before inscription, and process criteria that should be met over a defined time scale. With SA 8000, the process of preparing for certification is extremely flexible. However, once certification has been reached, there is less flexibility in the implementation of standards. Although some flexibility is implied in the minor and major corrective action warning system, failing to meet the basic criteria of the standard will jeopardize certification. In IFOAM, there is flexibility of a different sort. The Basic Standards are necessarily vague as they will be adopted by accredited certification bodies and fleshed out to apply to the particular conditions appropriate for that body and region and to the particular crop considered.

With regard to **arbitration**, both accreditation agencies (SAI and IFOAM) have set out clear channels for arbitration. This could be due to the need for accredited certifiers of IFOAM and SAI to have clear rules to follow. SAI's complaint and appeal procedure is open to all interested parties that object to a certification or to the accreditation of a certification body. The processes of arbitration for FLO and BBP are not as clearly articulated in public documents, although FLO appeals can be addressed to the newly formed Appeals Committee if they feel they have been sanctioned unfairly.

Beyond arbitration, all initiatives have a **process for de-certification** when major violations of the standards/criteria are found during inspection and monitoring. All systems distinguish major breaches from minor ones. Furthermore, in systems based on continual improvement such as FLO, BBP and SA 8000 minor breaches are corrected through time while major breaches, if not dealt with, may mean that certification is withdrawn.

Some of the procedures for the **use of labels** monitor the physical **chain of custody** of the products. In the Better Banana Project and organic systems under IFOAM, the integrity of the chain of custody is essential given the actual labelling and/or promotional claims made regarding the product. In both cases, chains of custody audits/inspections are carried out so that a clear separation between certified and conventional products can be made at all times from production to the retail level. In the FLO system, the trading chain of custody is controlled by the national initiatives,

which are responsible for the control of fair trade labels and registering of importers/retailers. In order to grant the use of the fair trade label, the national initiative must ensure that importers/retailers have complied with fair trade purchasing conditions. In the SAI system, certification is done on a plant-by-plant basis rather than on the entire chain of custody. The focus is on workplace conditions, not on the product itself. However, there is an element of supply chain focus within SAI as members (retailers) are encouraged to find and assist suppliers (facilities) to meet SA8000.

In terms of **funding the monitoring system**, in all cases, except FLO, the producer pays for the costs of inspection and certification and may include this in the farm-gate price. In the BBP, however, there is a provision for producers who cannot afford these costs where alternative sources of funding are sought. Also in ETI, the principles of implementation state that the company must ensure those human and financial resources necessary to comply with the code are made available. In the FLO initiative producer groups/plantations do not pay for the costs of monitoring and inscription. Instead, importers and/or retailers are charged a licence fee for the use of the fair trade label of the consumer country. This cost is passed on to consumers through higher retail prices for fair trade bananas. The sustainability of Fair Trade is also based on the decreasing profit margins paid to importers and, more rarely, to retailers.

For some initiatives the certification cost borne by producers may be offset by higher sales prices. The FLO system functions through a social premium that the importer pays on top of the market price or a fair trade minimum price, whichever is highest at the time. This social premium is to be used for activities that promote social and socio-economic justice as well as ecological protection. It is also normal for organically certified products to fetch a premium above market prices.

In terms of **other sources of funding**, most initiatives rely on external funding from private and public institutions, fund raising and revenues from promotional activities. ETI receives less than half of its funding from the British government and this is decreasing as a proportion as membership grows.

Standards

Environmental Criteria

The first major distinction to be made is that SA 8000 and the ETI do not cover environmental issues; therefore, they do not have environmental criteria to compare.

IFOAM, the Better Banana Project of the Conservation Agriculture Network and FLO's standards all contain broad statements about the need to **conserve and protect habitats and ecosystems**.

All three initiatives prohibit the clearing of primary **forest** and the BBP prohibits deforestation. BBP requirements are the most comprehensive on the issue of reforestation, requiring that all lands not suitable for cultivation be re-forested. For the BBP, IFOAM and FLO, their standards all contain a list of specific high ecological value ecosystems that should be conserved.

In terms of **soil conservation and management**, BBP, FLO and IFOAM standards all require specific activities for erosion control. Land must be suitable for the proposed crop and soil conservation practices should be undertaken to sustain long-term productivity, fertility and biological activity within an integrated crop/pest management program. One final point, the standards of FLO link the issues of water conservation to soil conservation much more explicitly than the BBP and IFOAM criteria.

With respect to **Water conservation and Watershed Management**, IFOAM's criteria are very general. Both FLO and BBP cover this issue extensively requiring buffer zones along watercourses and filter/treatment of residual water from mills, washing facilities and packing station as well as requiring a monitoring system for water conservation and treatment. In both cases, water sources should be protected against pollution from agrochemicals.

With respect to pest and disease management, IFOAM totally prohibits **agrochemicals**, while FLO and BBP allow their limited and minimized application. They do not allow products prohibited by national laws, international agreements and conventions including pesticides in the FAO/UNEP Prior Informed Consent Procedure. All standards require adequate training, proper personal equipment and appropriate working areas. Only BBP covers detailed procedures for the transport of agrochemicals and the obligation for workers to undergo regular medical exams. Both FLO and BBP include specific requirements for agrochemical storage, procedures for aerial spraying and special provisions for pesticide-treated bags.

In terms of **other methods of pest and disease management**, all of IFOAM's methods fall under this category. The BBP and FLO also require integrated pest management or integrated crop management systems to be in place. These systems include physical, mechanical and biological practices to control pests. FLO's criteria are more comprehensive and come closer to those of organic farming and they include, only for organizations dependent upon hired labour, the presence of an agronomist in charge of the monitoring system.

In terms of **waste management and recycling** all three initiatives cover this issue. BBP and FLO have comprehensive requirements for waste management. All systems encourage the use of organic waste for compost. Reduction of inputs by using renewable resources in locally organized production systems is an objective for IFOAM. FLO's process criteria cover progress demonstrated on the reduction of resources used.

With respect to **environmental planning and monitoring systems**, IFOAM requires a clear conversion plan in its basic standards and a programme for fertilization and for pest and disease management. BBP and FLO both require environmental planning and monitoring though these are conceived in different forms.

In the case of the BBP, an overall plan on how compliance with the standards will be achieved is required and is reviewed as part of successive audits. For FLO, the premium work plan, incorporated in the annual report, aims to maintain compliance with the minimum requirements and to make progress on the process requirements. The environmental plan included as part of the premium work plan serves the double purpose of meeting compliance with the standards and evaluating the ecological progress of the plantation. A specific person/committee must be responsible for its implementation. More specific plans such as waste management plans (BBP) and integrated crop management plans (FLO, BBP) are to be included in the overall plans.

In terms of monitoring, BBP standards are explicit in stating that a monitoring system, according to scale of operation and intensity of production systems and to on-farm and nearby resources, must be set up so that compliance with the standards can be proven. This is the only mention of scale related standards for BBP.

In the case of FLO, the only explicit mention of a monitoring system is for the integrated crop management system. However, as the standards are based on continual improvement process criteria and the work plan is to be up-dated on an annual basis, this can be understood to be the basis for a monitoring system.

Social Criteria

It should be noted that all IFOAM's social criteria are vague, recommending that all ILO conventions with respect to labour welfare be complied with. IFOAM is aware of this deficiency and has initiated work to develop more specific social criteria.

With respect to **the right to freedom of association and collective bargaining**, all initiatives address these issues on the basis of ILO conventions (87 and 98).

One issue covered explicitly by FLO, BBP, SAI and ETI is the right to freedom of association. All four state that workers have rights to organize and/or form unions. SAI, ETI and FLO explicitly state that there will be no discrimination against representatives of organized workers and that these representatives will be allowed to carry out their functions. BBP covers this issue in a slightly different way by stating that companies must respect the right of workers to organize and freely associate, must demonstrate the existence of an acceptable organization which permits workers to negotiate freely with management, must not put pressure on workers regarding union membership and must ensure that workers are informed that they can address their complaints through the CAN.

FLO, by implementing a clear differentiation, moves beyond the other initiatives in terms of the comprehensiveness on the issue of participation in decision making and in collective bargaining. Collective organizations must be democratically organized with organizational structures that guarantee control by members. In organizations dependent upon hired labour a recognized union is expected to represent the workers, although, if there is none, a democratically elected committee is acceptable. Furthermore, FLO standards not only recognize the right to collective bargaining but put this into practice with the requirement that a collective bargaining agreement, or if there is no union a terms of employment document, be drawn up and approved by all parties, including coverage of issues from salary to maternity benefits, from dismissal to vacation. Furthermore, both types of organizations are to undertake permanent education and training activities to enhance the participation of members.

With regard to **wages**, all require that they are equal to or greater than the established minimum legal wage and/or the average regional (industry) salary and all, but IFOAM, include requirements as to the administration of payment. SA 8000 and the ETI impose an added qualifier for the minimum wage, that it shall be sufficient to meet basic needs and to provide some discretionary income.

For FLO, the fair trade premium, paid by the consumer indirectly to the producer, can also be added to the minimum wage if this is below regional and industry average. If this is not the case the premium work plan, jointly drawn up by workers and

management, directs the bulk of the premium towards complying with the standards and fostering the organizations' further development.

Social security is an issue that is addressed by all five initiatives, though in different ways. SAI and ETI approach this issue by prohibiting practices that would avoid national laws and regulations on social security. BBP states that companies must implement a social policy in accordance with national labour standards, international conventions and the CAN criteria. The social policy is decided by the company's management and then communicated to workers. Similar communications are required for any change affecting the social, economic or environmental situation of the farms. For both FLO and BBP, third party contracting is not allowed or only in specific cases and then workers must have the same social security benefits.

The other schemes address social security by discussing content issues. For example, IFOAM's recommendations call for the meeting of social security needs such as maternity, sickness and retirement benefits. For FLO, these issues and others are to be included in the Collective Bargaining Agreement that is to be re-negotiated every year. FLO minimum criteria for organizations structurally dependent on hired labour include social security provisions premium for all workers and a pension fund or scheme within one year from certification for all permanent workers.

In terms of **hours of work limitations**, SAI and ETI state that working hours should comply with applicable national laws and industry standards. In any case, they, together with BBP, state that 48 hours/week is the maximum regular level with 1 out of 7 days off. All three allow overtime work provided it is on a voluntary basis to a maximum of 12 hours per week in exceptional circumstances and paid at a higher rate.

With respect to **equity in wages and non-discrimination**, all initiatives have standards to cover the issue in varying degrees of detail. All standards prohibit any form of discrimination including in wages and opportunities. BBP requires the company to issue a Code of Conduct and to demonstrate the application of a non-discriminatory policy. Similarly FLO requires a system to be in place for the progressive elimination of all forms of discrimination (as in ILO standards). SAI also includes requirements not addressed by other initiatives, including non-interference with the exercises of rights of personnel to observe tenets or practices or to meet needs relating to race, caste, national origin and disability among other categories as well as the prohibition of sexual harassment.

The **specific protection of certain categories of workers** is addressed by all initiatives. The most covered group is children: all standards refer to UN conventions and the UN Charter of Rights for Children. All initiatives explicitly state in their standards that child labour is not allowed; a child is commonly considered below 15 years of age, only BBP sets the limit at 14. All initiatives, except IFOAM, show special consideration for young workers, normally defined as in between 15 and 18 years of age, who must not undertake hazardous work. BBP and SAI define the maximum number of working hours for young workers (42 per week and 8 per day for BBP, 10 per day for SAI education and transport included). A further requirement that FLO, ETI and SA 8000 share is that any work undertaken by young people do not jeopardize schooling.

With regard to **disabled workers**, the only initiative to specifically address the issue is BBP, prohibiting workers who are mentally unfit or who have chronic diseases, respiratory diseases or weaknesses from handling agrochemical. In all other initiatives disabled workers fall under the general category of non-discrimination.

Pregnant women are explicitly referred to in FLO and BBP standards, while they fall in a more general non-discrimination clause for the others. FLO's norms are included in the collective bargaining agreement and in the minimum requirement that maternity leave be at least 12 weeks with basic salary guaranteed for permanent workers. BBP on the other hand prohibits the displacement of pregnant or nursing women and the performing of tasks, like the handling of agrochemical, that may endanger their health or that of their child.

Another category of worker for whom special protection has been seen as necessary is **migrant or temporary workers**. Only FLO and BBP address this category of workers specifically. BBP states that there should be no discrimination against foreign workers including in wages. FLO seems to consider cases where there might be different treatments for casual, seasonal and permanent workers in plantations, stating that the collective bargaining agreement is applicable for all workers, but that possible differences for these types of workers must be indicated (criterion 3.2). However, it requires that these differences be progressively diminished and that, in any case, social security premiums be paid for all workers.

All initiatives address **occupational health and safety** aiming to minimize and prevent any hazards inherent in the working environment. All except IFOAM have standards that cover the need for adequate training and equipment for workers and provision of information on related issues including: the use, handling and storage of agrochemicals (FLO and BBP) as well as the use of tools, machinery and equipment (FLO and BBP). All, but IFOAM, require that a person be appointed and made accountable of the Health and Safety requirements in the standards. Only BBP requires periodic medical examinations to guarantee capability to fulfil hazardous tasks. IFOAM's basic standards only has a general requirement that 'in all production and processing operations, labour conditions regarding noise, dust, light and exposure to chemicals should be within acceptable limits and workers should have adequate protection'.

Basic Needs is an issue addressed by all initiatives. However, each initiative stresses different aspects. For example, BBP is very comprehensive in detailing housing considerations, while SAI, BBP and IFOAM address the issue of medical care directly. Education is included by all. BBP and FLO both require that environmental education be provided to workers, while the other initiatives issue more general statements. Surprisingly, FLO's requirements on basic needs are not spelled out in a detailed way. The intention might be to leave the choice of criteria for basic needs to the worker representations and producer organizations.

In terms of **relations with local communities and indigenous rights**, only IFOAM and BBP cover these issues. IFOAM recommends that the rights of indigenous peoples be respected while BBP extensively considers the linkages between local communities and the agricultural operations in environmental, socio-economic and employment terms.

The final category under social criteria is **company policies**. All initiatives include general policies on social justice in their standards. Training is a key in all initiatives with the exception of IFOAM. SAI, ETI, BBP and FLO, all cover training for workers related to health and safety issues and also broaden the application to other topics in the standards.

With respect to **planning and monitoring**, all systems, with the exception of IFOAM, require an overall management plan to implement the social criteria. Linked to the

management plan, a monitoring system is generally required to be in place to evaluate and update the plans. However, not all initiatives explicitly state the need for such monitoring systems. Finally, all systems have in place a process for corrective action though again, this is not always explicit.

A final point to make here is the unique requirement in the ETI base code for negotiations with suppliers to take into account the costs of observing the code. In this way, the social costs are internalized into the supply chain cost structure.

Economic and Institutional Criteria

Under economic and institutional criteria, the following categories are addressed: economic viability, diversification, access to credit, time horizon, and respect for legislation/principles and accountability.

Economic viability is not an issue addressed directly through the standards, though in most cases it is implied as a basis for being able to address social and ecological issues. However, both the BBP and FLO suggest the need to account for economic viability, somewhat moderating environmental protection and performance. Hence, for example, the allowance of agrochemicals where necessary, in order to protect farmers from economic failure and to ensure optimal production.

In terms of **time horizon**, a main objective of both FLO and the ETI is to foster long-term relationships between producers and importers/suppliers/retailers. The BBP management plan requires short, medium and long-term goals. For all initiatives there is an implied or explicit assumption that the commitment of the company/producer/organization undertaking the certification or inscription is long-term.

Respect for legislation is covered explicitly by all initiatives. All five state in their standards that local and national laws of the country where production is based must be complied with. In terms of compliance with ILO conventions, all initiatives set them as a base for their social criteria. Finally in terms of compliance with other international agreements, IFOAM, SAI and BBP cover compliance with the UN charter of Rights for Children. SAI and BBP standards are also based on the Universal Declaration of Human Rights.

The final issue addressed in this section is **accountability**, covered in various forms by all initiatives. Accountability can be addressed within internal structures of the company/organization or in terms of external relations. In terms of internal accountability, FLO stresses the need for large participation and approval, SAI, BBP and the ETI require that standard procedures be in place. At the level of certification agencies, IFOAM's accreditation criteria cover issues of accountability, responsibility and access to information. In terms of external accountability, all cover this issue explicitly in their standards, though different vehicles are used to ensure this, the most common being access to books and records.

Ongoing developments

Since the first presentation of this comparative study at the Expert Meeting held at FAO in March 2000 all initiatives have continued to refine and improve their criteria, processes and procedures.

In particular, BBP has rewritten its Banana Standards, increasing both environmental and social requirements. Most of the progress has been made in moving towards greater levels of detail in the environmental indicators and in the introduction of social policies on the plantation. Also, FLO has reviewed its banana-specific criteria. As written above, FLO is setting up a new certification unit to separate fully its inspection and certification functions from its producer support functions.

Furthermore, IFOAM is gradually developing a social agenda through a participatory approach and is evaluating the possibility of developing a Code of Conduct addressing social issues for all organic traders.

In the mean time, FLO, IFOAM, SAI and CAN, together with other organizations, have joined into an organization named ISEAL in order to promote their programmes, develop a more professional approach to certification and accreditation, and defend their common interests. In this context they also have investigated areas for further collaboration.

There has been increased momentum for collaboration between programmes working in banana certification since the March 2000 expert meeting. A Working Group on responsible banana production and trade has been formed to facilitate dialogue and co-operation on specific topics. The Group has produced a brochure describing the various banana certification schemes targeted for the use of retailers. Also, it has been designing a joint project to improve the efficiency of certification and train inspectors and farmers on pilot farms. The Group has also established an electronic discussion forum and intends to prepare a manual on responsible banana farming for growers.

Conclusions and scope for further collaboration

Generally speaking we can affirm that each standard has its own specificity, objectives and type of beneficiaries: IFOAM in organic standard setting and accreditation of certification systems through the International Organic Accreditation Service, FLO in issues related to smallholder and disadvantaged producers, BBP with a focus on large plantations, SAI in certifying management systems in a corporate environment and ETI as a learning initiative investigating social issues involved throughout the supply chain.

From the above discussion, it becomes apparent that SAI's SA 8000 and ETI's social standards are similar with regard to most issues. The order differs but the wording is, in most cases, similar.

IFOAM and FLO share relatively similar holistic approaches in their standards and criteria, even though they are founded on different bases: many of FLO's criteria can be met over a defined time scale, while IFOAM's are a prerequisite for certification. Moreover, organic standards are essentially global standards while FLO's standards are specifically designed for developing countries. Market developments have

increased demand for products that are both certified as fair trade and organic. This may require some harmonization of inspection procedures to make dual certification easier. More attention might also be placed on training activities and generally information sharing between these two systems.

FLO's approach whereby minimum requirements to be met immediately are balanced by clearly defined "process requirement" to be met over time could be adopted by other certification programmes. The BBP could probably use this approach to convince the plantation managers to adopt stricter social criteria over time. (The BBP already has a requirement for continued improvement that could facilitate this approach).

Furthermore, one area where all initiatives but ETI have much in common is the actual inspection and certification process. In all cases, the same basic steps are followed even though the organization and the inspection team carrying out the inspection can vary. Of these steps, the inspection and monitoring processes offer perhaps the most useful possibilities for further co-operation.

Clear lines of responsibilities, objectives, beneficiaries and geographic scope are needed so that producers, supply chain actors and consumers are not confused by the various initiatives. Extra efforts to explain the standards and labels to the consumers may be necessary, especially in a period where corporate codes of conduct, environmental or social labels are proliferating and increasing consumers' confusion.

Beyond the points of convergence mentioned above, all of the initiatives have many overall characteristics in common. These characteristics include the desire for improvement in the lives of workers and producers, and the choice of vehicle for action through a set of standards and criteria to be complied with and verified by independent third parties. They all point to the need for closer collaboration so that the beneficial impacts of the initiatives are not lost in cumbersome administrative processes and inertia.

Introduction

The banana is a staple fruit enjoyed by people all over the world; as such, it is the world's most exported fruit in terms of volume. In 1999, world banana production was over 64 million tonnes while exports of bananas accounted for 25 percent of this amount (FAO 2000). International trade in bananas is valued at almost five billion dollars (US) per year.

Banana production is generally characterised by intensive systems requiring high chemical inputs to maintain fertility and reduce losses caused by pests. However, as any other intensive agricultural production systems, negative ecological impacts resulting in excessive deforestation, watercourse and watershed pollution, soil degradation and the damage to ecosystem health diversity can occur if not properly managed. Similarly, banana production may have adverse effects on worker health, safety and well being if proper production methods are not in place and working conditions and other social concerns are not adequately addressed.

Reflecting higher levels of public awareness on social, ethical and environmental issues worldwide, consumer preference for products with and environmental and social "content" is rapidly increasing. In response to these concerns, many companies have taken steps to improve actively social and ecological impacts of production and trade.

In this climate, a number of voluntary initiatives have been developed to support supply-chain actors in promoting banana production, trade and consumption based on social justice and ecological protection principles through monitoring, certification, labelling and codes of conduct. Key initiatives include:

- The Fair Trade Labelling Organizations International (FLO) program to promote fair trade for disadvantaged producers in developing countries,
- The Rainforest Alliance Better Banana Project (BBP) that supports ecologically and socially preferable banana production,
- Organic production and certification systems through the International Federation of Organic Agricultural Movements (IFOAM), to ensure that bananas are grown without the use of agrochemical and in what is considered a holistic manner.
- The UK based Ethical Trading Initiative (ETI) is exploring how companies can test and monitor labour and social conditions in the workplaces of their suppliers. One of its pilot projects is focusing on bananas in Costa Rica.
- Social Accountability International (SAI), formerly Council on Economic Priorities Accreditation Agency (CEEPA), and their Social Accountability Standard SA 8000, which has been used to promote ILO conventions of social justice and labour conditions.

While these various initiatives do address unique issues and target different actors in banana production and trade worldwide, there is significant potential overlap that needs to be considered. One potential problem of this overlap is consumer and retailer confusion when faced with an overload of information and claims from many different kinds of labels. Another issue is producer fatigue of inspections and the certification process. Producers or producer organisations may have to decide between different initiatives or take on multiple certifications to cover a range of different issues of interest to consumers. Producers also need to consider the requirements of their client base in the supply chain; this can influence which certification systems they participate in. While the costs of certification in general can be high, costs for multiple certification can be prohibitive. A further issue relates to

the human and financial resources that are required to set up and run these various initiatives. If resources could be saved through co-operation on various activities, they could be used to address other critical issues.

This study examines the main certification programmes in sustainable banana production and trade mentioned above. The report is divided into three sections: General Principles and Objectives, Monitoring and Control, and Standards. The Standards section, comprising the bulk of the report, is sub-divided into environmental, social and economic-institutional criteria. Following this, a conclusion will summarise the main similarities and differences of the various programmes. In doing so, the prospects for further convergence will be examined.

In the creation of this report, a number of documents were used from the various initiatives. They mainly consist of the actual standards and other supporting documentation (guidance in the case of SAI SA 8000, principles of implementation in the case of the Ethical Trading Initiative, IFOAM accreditation criteria and the operating manual of the Accreditation programme) including materials from the Internet web sites of the various initiatives. These are all listed in the Bibliography. Given that this is a standards comparison report, references have not been placed at each point where documents have been referred to for practical reasons. However, at any point in time, the reader can refer to the tables in the appendix that detail the actual standards requirements and indicators for each initiative divided by the categories used in the report.

This is a desk study of the standards, their actual implementation on the field is not addressed in this report. Equally, the standards comprised in the report are subject to continuous review, hence the contents of this study relate to and are updated to the state of the standards on the date of issue.

I. General Principles and Objectives

In this section, the five main initiatives will be examined and compared according to their basic principles, values and philosophy and their main objectives as well as their main focus. Finally, the history of each system will be briefly mentioned so that they can be put into perspective.

- **Basic Principles, Values and Philosophy**

One of the fundamental similarities in the basic principles, values and philosophies of all the initiatives is the perception of a need for change in current economic practices. Even though this is achieved from different points of view, i.e. environmental, commercial and social, this is a commonality that links all initiatives.

For both the Ethical Trading Initiative (ETI) and SAI's SA 8000, the main goal is to improve working conditions and the lives of working people around the world. The Fair Trade Labelling Organisations International's (FLO) aim is narrower since it focuses on improving the lives of disadvantaged producers. For both the International Federation of Organic Agricultural Movements (IFOAM) and the Conservation Agriculture Network's (CAN) Better Banana Project (BBP), the social justice goal is more vague. For example, the BBP mission is to "transform social and environmental conditions in tropical agriculture..." and one main IFOAM goal is to

“further organic agriculture as an ecologically, socially and economically sound and sustainable system of farming...”

It should be underlined that ETI is established as a learning initiative to explore how to monitor compliance with a code of conduct in companies.

In terms of the place of environmental values in the basic principles and philosophy, there are significant differences between the initiatives. Both the Ethical Trading Initiative and SAI SA8000 do not include environmental values at all, while for IFOAM and the CAN BBP programme, environmental objectives are fundamental principles. IFOAM takes a holistic approach linking both social and ecological spheres into organic farming systems though in terms of certification, it has not really set up detailed social standards. It should also be noted that most social issues covered by IFOAM are written as recommendations, not requirements. In the BBP, at least six of the nine basic principles are ecologically orientated. In the case of FLO, though ecological values are not heavily stressed in its aim, a major goal is sustainable development, including social and ecological values.

Main Objectives

The “Main objectives” category covers the initiatives’ general statements about how to put into practice the basic principles, values and philosophies discussed above.

In all of the initiatives, a main objective involves the implementation of the obligations underlying respective standards. This operational objective ensures the proper functioning of all systems. In all of the initiatives this also involves a commitment to developing standards. In the case of CAN’s BBP, IFOAM and SAI SA 8000, there is a commitment to active writing of the standards in terms of revision. For SAI, this involves developing consensus-based voluntary standards by convening key stakeholders. FLO has recently admitted producers and traders in its Board and has set up an ad hoc Standard Committee responsible for elaborating options and recommendations on the reviewing of the criteria to the Board.

The ETI, BBP, SAI SA 8000 and FLO all include an objective of encouraging producers/companies to realise the standards/main principles. For example, the BBP focuses on encouraging producers to meet the standards set out while the ETI emphasises the need to encourage companies to adopt the code of conduct and FLO adds a different dimension by supporting programmes that realise its main principles and those of the producer organisations. SAI’s SA 8000 mission is to enable organisations to be socially accountable through the standard setting and accreditation processes.

The two systems that include an accreditation system, IFOAM and SAI SA 8000, also emphasise the need for accreditation to “verify compliance” in the case of SAI and to “make an international guarantee of organic quality a reality” in the case of IFOAM.

In terms of education and awareness raising, SAI, IFOAM and FLO all include this element. For IFOAM, this objective involves “exchanging knowledge and expertise among members and to inform the public about organic agriculture”. For SAI, this is seen in a general statement regarding promoting “understanding...of such standards world-wide”. For FLO, publicity campaigns to raise awareness are an objective of its member national initiatives.

Other objectives not shared by more than one initiative are the following: for FLO, a main objective is to promote the sale of products sold and produced under fair trade

conditions. SAI stresses the need to promote understanding of social auditing techniques and the management systems needed to improve workplace conditions and for IFOAM, a main objective is to represent the organic movement in different forums.

- **Main Focus**

The main focus of the initiatives can be understood in terms of who the beneficiaries are, whether there is a social or ecological focus or both and the geographic scope of the initiatives. Each of these will be considered.

Beneficiaries:

In terms of the **beneficiaries** on the production side FLO aims to certify small-producer organizations primarily dependent upon family labour (collective organisations) and plantations dependent upon hired labour, both being in a disadvantaged and marginal position with respect to local and international markets. In IFOAM, accredited certifiers have special criteria for indirect certification for grower groups (Accred. Criteria 10). BBP and the ETI certify production facilities while SAI certifies management systems.

Depending on the nature of the initiative, other beneficiaries and actors will be stressed. For example, FLO has developed a system to display fair trade labels through national labelling initiatives in consumer countries so that consumers know the product has been fairly traded. IFOAM also sees consumers as a key beneficiary of organic systems. SAI SA 8000 views consumers wanting clear information as beneficiaries as well. Both the ETI and SAI SA 8000 include active participation from other actors in the supply chain as key actors such as NGOs and unions. It should be noted that ETI and SAI both emphasise retailers as key actors who should encourage their suppliers to take on the standards of the initiatives; these can be large or small companies.

Focus: social or environmental

In terms of focus, both the ETI and SAI SA 8000 are strictly focused on social justice as was mentioned earlier. FLO is mainly social in its focus though comprehensive environmental criteria are included for bananas and a main objective is sustainable development. The BBP is mainly environmental in its focus though two of its nine principles address social justice and labour issues. Organic systems are mainly environmentally focused though social recommendations and standards have been introduced, vague as they might be. It should be noted that organic systems are understood to be holistic, requiring both social and ecological elements.

Geographic Scope:

With respect to geographic scope, production and consumption should be differentiated. In terms of production, SAI SA 8000 is meant to be applicable worldwide as is IFOAM's organic system. However, with the particular commodity of bananas, this will be limited in scope to tropical agricultural areas. FLO limits its

production scope to developing countries. The CAN BBP similarly covers tropical countries given its tropical agricultural emphasis.

In terms of trade and consumption, the BBP and IFOAM programmes are not limited by policy. FLO's focus on trade and consumption is limited to 17 member countries where national labelling initiatives have been set up; these are in Europe, Canada, USA and Japan. The ETI is a UK-based programme; given this, its main focus in terms of consumption is the UK though there may be links through trade with other countries. SAI does not cover consumption since it only certifies production facilities.

- History of the Initiatives

It is useful to briefly examine the history of the various initiatives to understand their context and how they have evolved to their current structures and operations.

The oldest of the initiatives by far is IFOAM's organic certification system. IFOAM was created in 1972 as a non-profit federation linking diverse groups with an interest in organic agriculture. In 1980, the first Basic Standards were published and have since undergone a number of reviews. In 1990, the General Assembly authorised an accreditation programme, which is now the IOAS or the International Organic Accreditation Service.

The Better Banana Project began in 1991 by the Conservation Agriculture Network, a network of independent, non-profit conservation organisations with the Rainforest Alliance acting as the New York-based secretariat. Since its beginnings the programme has expanded to many countries and into other crops.

While FLO International is a young organisation, founded only in 1997, many of its member organisations have been active for ten years or more. For example, the first national labelling initiative was Max Havelaar, in the Netherlands, established in 1988. FLO was created to harmonise and standardise the fair trade labelling initiatives in the world as well as the producer registers and their respective criteria.

SAI, formerly CEEPA, was incorporated in 1997 to address the growing concern among consumers about labour conditions around the world by providing a standardised code of conduct that would be consistent, cost-effective to monitor and operationalise but also sensitive to local laws and customs. Since its inception SAI has worked closely with NGOs, trade unions and business to develop SA 8000.

Finally the ETI was formed in 1997/98 and has been operational since mid 1998. The ETI was developed through an alliance of companies, NGOs and trade unions in the UK and has been supported by the British government.

These different initiatives have developed during different waves of interest in social and ecological issues in production and consumption. They have unique backgrounds, with IFOAM being member driven and historically a producer-driven organisation compared to FLO that began as a consumer organisation-driven initiative at a time when social issues were rarely discussed by business. This is in contrast yet again to SAI and the ETI that were developed through collaborative efforts by various stakeholders at a very different time.

II. Monitoring and Control

This section includes the following categories: accreditation, certification process, and inspections, use of labels, chain of custody as well as structure and funding of the monitoring system.

- **Accreditation**

Within all of the initiatives, only IFOAM and SAI SA 8000 have an explicit accreditation system with accreditation criteria and processes in place.

Within FLO, until 2001, the FLO International Secretariat and the Producer Register Committees carried out the standard setting, certification, monitoring and the producer support activities. As a result of a restructuring process, starting from 2002, producers and traders will be represented in the FLO Board that manages the standards and the certification operations. Furthermore, a cross-product Standards and Policy Working Group, a Certification Unit responsible for carrying out inspections, an Appeals and a Certification Committee will be set up. More generally, certification will be distinct from producer support functions.

In the ETI, it is too early to tell whether an accreditation system will develop. Questions of who monitors and who certifies are under examination through discussion among stakeholders and through pilot studies. In the BBP, the Conservation Agriculture Network, a network of independent conservation organisations in different countries, carries out the programme. CAN staff conduct the inspection rather than an accredited body and are thus responsible for the certification.

Access to IFOAM accreditation is open to applications from certification programmes engaged in inspection and certification of organic production and/or processing. Access to SAI SA 8000 accreditation is open to professional certification bodies (firms) and to NGOs.

Both systems have well documented accreditation requirements. IFOAM's accreditation criteria involve issues such as competence, independence, accountability and responsibility, objectivity, credibility, quality improvement and internal review, access to information, confidentiality, participation and non-discrimination. SAI's criteria include an adherence to ISO Guide 62 as well as competence in activities necessary to carry out an effective SA 8000 audit. These include obtaining and maintaining information about working conditions and demonstrating how such information is incorporated into plans for audits and surveillance visits, determining the sufficient wage level, ascertaining the languages spoken by personnel, maintaining client files, ensuring audit personnel are trained in the components of the audit, applying the SA 8000 procedures to select a team of auditors, obtaining factual information in a manner sensitive to local cultural norms and protecting confidentiality of workers among others. IFOAM's accreditation criteria also include special conditions for local cultural norms.

The differences between the accreditation criteria are due to the fact that IFOAM is accrediting certification agencies from a large pool of already existing organic certification bodies who have experience in applying organic norms to an inspection and certification system. In the case of SAI, social auditing is a new process without a large number of existing bodies with much experience in this particular area. Given

this, the accreditation criteria must spell out in more detail what is actually necessary for a certification body to accomplish. IFOAM's accreditation criteria are more focused on the finer details of how an organic certification should be conducted.

In terms of the mechanisms of accreditation, in both cases, a process exists to evaluate, accredit, review and sanction applicant bodies as well as terminate accreditation.

For the two certification initiatives that do not have an accreditation system in place, conflicts of interest could potentially be envisaged. This is due to the multiple responsibilities placed on the certification body including the development of standards, the control of the certification process and the carrying out of inspections, chain of custody issues and control over labelling where applicable among others. Care should be taken to explicitly separate certification activities from other activities of the organisation so that the independence and credibility of certification is maintained.

- **Certification Process**

In terms of certification, there are a number of issues to be addressed. These include the general process for certification, flexibility, confidentiality, arbitration and de-certification.

Process of Certification:

Regarding the process of certification, both FLO and the BBP have a process laid out. IFOAM does not carry out certifications; however, in its accreditation criteria, there is a section on certification that spells out what the accredited certification body should have in place in terms of a certification process. SAI also does not certify as it accredits certification agencies to do so. However, accreditation agencies here directly audit for compliance with SAI SA 8000 standard, not their own. The ETI does not certify as it has a learning by doing approach through its members and through pilot studies. However, there is an agreement in principle that the assessment of the implementation of the codes should be carried out through monitoring and independent verification.

All of the systems that carry out certification including BBP and FLO include in their certification process, the following steps: 1) the producer applies for certification through making internal steps to meet the standards/criteria and to send information to the certification body; 2) there is the possibility of a preliminary visit to check conformance to the criteria; 3) there is an evaluation of the applicant including a site visit and review of documentation; 4) a decision is made regarding certification by the BBP and by FLO; 5) the applicant body and the certification agency sign a contract; 6) there is a process of periodic review. The process for certification under IFOAM and SAI accredited bodies follows these steps as well.

In the Better Banana Project of the CAN, the certification committee determines whether certification is granted on the basis of the inspection report. In FLO, the newly formed Certification Unit will decide on inscription of new producer groups. In the case of SAI and IFOAM, the accredited certification body makes this decision based on the standards, criteria and guidance laid out by the accreditation bodies.

Of note, the IFOAM accreditation criteria for certification are more comprehensive than those of the other initiatives as they deal with the need for clear recording and communication between parties and for clearly stated reasons in the event that certification is denied among other points.

Also of note, SAI has a two tiered system of participation. At one level, retailers can become members of SA 8000 by committing to the standard and by sourcing suppliers who adopt internationally recognised workplace standards. At another level, suppliers (manufacturers, processors) can apply for certification of their facilities by an accredited body. The objective is for SA 8000 members to commit to a process of encouraging and assisting suppliers to meet SA 8000.

Flexibility:

In terms of flexibility shown in the certification (and accreditation) process, all the systems show flexibility in different ways.

Perhaps the most flexible system is the ETI given that it is in the process of development whereby members use various tools to implement the base code. There is recognition of complex issues in dealing with supply chain relationships and the need for flexibility in implementation.

The BBP, SAI SA 8000 and FLO are flexible through a commitment on behalf of certified bodies towards continual improvement.

In the BBP, certification takes place once the majority of the indicators have been met and the farm manager has an approved work plan for continued improvements. Furthermore, in the BBP standard the detail and scale of the environmental management plan should be in accordance with the size and intensity of operation of the farm.

In SAI, the process is extremely flexible in the lead up to the certification. Support is provided initially through self-assessment modules and there is the possibility of gaining feedback from pre-assessment audits. The number of interviews with workers will vary with the size of the operation so that larger operations will require more interviews and hence a longer and larger audit.

An applicant also has up to two years to gain certification to ensure compliance. However, once SA 8000 certification is reached, there is less flexibility in implementation of standards though the system of minor and major corrective action warnings implies some flexibility.

FLO has specific content criteria for small-producer organizations primarily dependent upon family labour (collective organisations) as well as different criteria specially tailored for plantations dependent upon hired labour. IFOAM's accredited certifiers have special criteria for indirect certification for grower groups (Accred. Criteria 10). In FLO, criteria are also divided into "minimum criteria" that must be met for inscription and "process criteria" that should be continually improved upon.

Furthermore, in IFOAM there is flexibility of a different sort. IFOAM's Basic Standards are necessarily vague as they will be adopted by accredited certification bodies and fleshed out to apply to the particular conditions appropriate for that body and region. Similarly, organic standards are vague as they apply to a wide range of crops. For example, very few certification bodies have developed specific criteria for bananas. The role of the inspector is therefore critical in applying the standards to a particular crop. This vagueness of basic standards can have advantages and

disadvantages in effectively addressing the needs of producers and consumers. Where the standards are vague with little national or regional context, the inspection process may vary depending on the inspector at the time. This can create conflicts in future years when a different inspector is used in cases where a strong inspector-training programme is not in place. Where vehicles exist for these Basic Standards to be incorporated into national or regional level standards then these may better reflect socio-economic, climatic and ecological conditions of production. The existence of national level certification bodies may also strengthen the local capacity building with other positive related effects. However, given that consumer credibility must also be maintained through increased international trade, mechanisms must be in place to secure this. In the case of IFOAM, this is maintained through the accreditation system of IOAS. It should be noted that the issue of balancing local production needs with international certification and consumer credibility is not unique to IFOAM.

Confidentiality:

While confidentiality is important for all initiatives and undoubtedly is considered critical with regard to inspection reports and supplementary documentation provided by the applicants, confidentiality is only mentioned in the standards and supporting documents of IFOAM, SAI and the ETI. In IFOAM, confidentiality in the process of certification is a main criterion for accreditation. In SAI, auditors must respect the confidentiality of interviews and other documentation from workers and must also be available to receive any complaint or appeal from workers. Similarly, in the ETI's principle of implementation 2.4, workers covered by the code must be provided with a confidential means to report failure to observe the code. ETI recognises that confidentiality is a key concern for companies in addressing the issues of monitoring and verification. A main issue is the fear of damaging relationships with suppliers based on trust. In BBP, the company must ensure that workers are aware of and identify the certification program as an external body that may be notified regarding any complaint or claim.

Arbitration:

In every initiative, there is a process to be followed in the event of non-compliance possibly leading to non-certification or de-certification. No information regarding arbitration programme for the BBP programme was found.

Both IFOAM and SAI have set out clear channels for arbitration, as does the ETI.

In IFOAM's accreditation criterion 7.3 for Appeals, IFOAM requires that the accredited body have procedures in place for the consideration of appeals against its decisions. Also, operators have the right to be informed about the identity of the inspector and to raise objections related to any potential conflict of interest.

In SAI, there is a three level process for complaints and appeals to be put in place. These include a company level complaints channel where problems can possibly be resolved without the involvement of third party auditors, a certification body level complaint or appeal process for workers and other interested third parties and finally an accreditation level process whereby any interested party can file a complaint or appeal about the accreditation of a certification body.

In the case of FLO, as a result of the restructuring process, if a monitor finds that an organisation is not complying with the selection criteria, it is reported to the Certification Committee for further action. Appeals can be addressed to the Appeals Committee reporting directly to the FLO Board. Nevertheless, the difference between minimum criteria and process criteria allows room for a differentiation of actions that can be taken. The inspector of the Certification Unit can also put an organization risking de-certification in touch with the Producer Support Facilitator. This process would help address the issue without taking it to the level of expelling the organisation for non-compliance.

De-certification:

All initiatives have a process for de-certification where major breaches of the standards/criteria are found during inspection and monitoring. All systems distinguish major breaches from minor ones. For example, in FLO, a major breach involves non-compliance with the critical minimum criteria; for IFOAM (and its accreditation criteria for certification bodies), a major infringement is a serious violation affecting the organic integrity of the product requiring the withdrawal of certification for a specified period. For SAI, a major breach leads to a Major Corrective Action Request (CAR) as opposed to a minor CAR. A major breach is defined as life threatening or in some way dangerous or presenting a risk to workers. For the BBP de-certification can occur after non-compliance with the standards or for not providing a track record of constant improvement.

In the ETI's Principles of Implementation 4 for corrective action, there is a commitment to negotiate and implement agreed schedules for correction actions with suppliers failing to meet the terms of the code. There is also a differentiation between minor and major breaches of the code, with major breaches requiring the termination of business relationships with the supplier concerned.

- **Inspections**

Inspections, audits and monitoring visits are required by all of the initiatives, except the ETI, to evaluate applicants for certification and inscription.

In the case of the ETI, pilot studies are undertaken to explore how to monitor compliance with its base code. The ETI has also concluded that its Base Code needs to be accompanied by detailed and concrete indicators. These are currently being addressed in relation to the Costa Rica banana pilot project. The ETI is also working on a Monitoring Workbook focusing on methods and a Guidance Document to address specific issues, the interpretation of code provisions and the development of indicators.

The frequency of inspections is at least once a year for BBP, FLO and IFOAM. In the case of BBP random audits may also be carried out while for IFOAM, certification bodies must carry out a minimum number of unannounced inspections each year. For the SA 8000 standard, a full audit is carried out every three years with semi-annual surveillance audits in the interim. According to surveys done by the ETI, the thinking of its members suggests that independent verification could range from 3 to 4 times per year to once every 3 years depending on the risk of non-compliance.

Within SA 8000 and the ETI, members must also submit annual reports to their respective agencies.

For all of the bodies that require inspections, the type of inspection is relatively similar. All inspections require on site visits to the producer (group) workplace (farms or plantations and offices), interviews with members/workers/management and staff, evaluation of financial and operational data and records relevant to the inspection as well as an evaluation of the management plan / system in place for implementation of the standards/criteria of the certification programme. Also, in the case of BBP and SAI SA 8000, the inspection involves meetings and discussions with other stakeholders such as NGOs and unions in the case of SAI and neighbouring communities in the case of BBP. SAI also requires that the inspection team demonstrate adequate knowledge of agricultural issue, such as agrochemicals and their impact on worker health.

The IFOAM accredited agency inspection also includes calculations of input/output balances and production estimates and in rare cases may involve soil analysis and residue testing.

FLO and BBP require a map of all production and facilities.

In terms of the length of the inspection, there are no defined periods of time. In each initiative, the length of the inspection varies depending on the size of the producer's (group's) facilities. IFOAM sets out minimum sampling criteria for collective producer groups but these also vary with overall size.

- Use of Labels

All of the initiatives with the exception of the ETI, which does not issue a label, have defined policies in place for the use of labels. These policies vary from programme to programme. In the case of BBP, FLO and organic systems, the importer, processor or retailer may apply for the right to use the initiative's label. As such each certification body controls and manages the use of labels.

In the CAN's Better Banana Project, programme staff controls the use of labels. Certified producers and companies purchasing or reselling products grown on certified farms can be granted the right to use the label in association with marketing at the wholesale or retail level.

In the Fair Trade system under FLO, retailers can apply for the right to use a label through the national labelling initiative in the country of import/consumption, upon proving compliance with fair trade purchasing conditions. These include payment of a minimum Fair Trade price or the market price, whichever is highest, and the development of long term relationships between buyers and sellers among others. The national initiative monitors the use of the label within the consumer country.

In organic systems, IFOAM-accredited certification bodies control their own labels. These bodies have signed a mutual recognition agreement to encourage the acceptance of each other's certifications. IFOAM is still in a process of developing a single seal to be made available for "clients" of IFOAM accredited certifiers. In SAI, once certified, the producer (Facility) is entitled to display the SA 8000 certification mark and use it as a selling point to customers and shareholders. There is no label to be placed on a product given that the certification is valid only for the particular facility audited and certified, not a chain of custody.

With regard to promotional material, the BBP states that the programme staff must approve all materials with the Rainforest Alliance seal including both on and off product materials.

- Chain of Custody

The five initiatives under study in this report vary greatly with respect to chain of custody.

In both the Better Banana Project and organic systems under IFOAM, there are comprehensive processes for ensuring the integrity of the chain of custody. This is due to the actual labelling of and claims made regarding the product. In both cases, chain of custody audits/ inspections are carried out so that a clear separation between certified and conventional product can be made at all times from production to the retail level. In these systems, the following actors may be subject to chain of custody audits: producer, packager/mill, exporter, distributor, and retailer. In the case of the Better Banana Project, retailers are not normally required to be licensed if a licensed vendor or the Rainforest Alliance provides promotional materials used. In the case of organic chains of custody, apart from maintaining the integrity of the organic product, organic standards for processing are incorporated including transport. Consumer laws vary widely with respect to organic labelling of products to include the entire supply chain in different countries, as does awareness of this issue among consumers.

In the FLO system, there is a division of responsibility between the FLO secretariat and the national initiatives. FLO undertakes the monitoring and inscription of producers while the national initiatives are responsible for the control of fair trade labels and registering importers/retailers. In order to grant the use of the fair trade label, the national initiative must ensure that retailers have complied with fair trade contracting conditions.

In the SAI system, certification is based on a particular facility rather than the entire chain of custody. The focus is on workplace conditions, not on the product itself. The guarantees of compliance are locally based. However, there is an element of supply chain focus within SAI as members (retailers) are encouraged to find and assist suppliers (facilities) to meet internationally recognised workplace standards. However, this is not what is actually certified. At that retail (consumer country) level, companies commit to adopting the standard in their own operations and agree to evaluate and select suppliers based on their ability to meet the requirements of SA 8000. Annual reports are required by each member company to be verified by SAI.

In the ETI, members sign up and agree to apply the base code to at least one part of their supply chain or product range. In this way, the chain of custody issues are extremely similar to SAI given the link between retailers and their suppliers.

- Structure and Funding of the Monitoring System

In terms of the structure and funding of the monitoring system, there are a number of fundamental differences between the initiatives.

Who pays for inspection and certification?

One major difference regards who pays for the certification and monitoring system. In all cases where a defined system exists, except for FLO, the producer (group) pays for the costs of application, inspection (travel, and per-diem rate for inspectors) and certification (normally a periodic fee i.e. annually). In the case of FLO, producers do not pay a fee for these activities. Instead, most financing of the monitoring system comes from a royalty taken from import side companies for the use of a fair trade label that is then passed onto consumers in the final retail price. With the Better Banana project, if a producer (group) cannot afford to pay the certification costs, alternative sources of funding are sought.

Like the FLO system, the Better Banana project also charges companies for the use of ECO-Ok or Better Banana seals. In this case, it is an annual fee based on the type of use.

As was previously mentioned in the accreditation section, a potential conflict of interest could exist if clear divisions of responsibility between payment for inspection and certification and other activities of the organisation are not defined.

Other Sources of Funding

Given the discussion above, the actual breakdown of funding varies from initiative to initiative. In the Better Banana Project, only 16% of operating expenses are covered by certification related expenses. The remainder is from foundation grants and support from Rainforest Alliance general funds. In the FLO system, most financing comes from the premium paid by consumers resulting from a royalty paid by a retailer/importer for the use of the Fair Trade logo of the national initiative. As this royalty is paid to the national initiative members, this income is used to fund their operational costs and activities. A percentage of this amount will also go towards operational costs of FLO International. This can be supplemented with external funding from private and public institutions, fund-raising and revenues from promotional activities. In organic systems, most funding to run certification agencies generally comes from certification activities. In the case of IFOAM, membership dues cover the majority of financing with foundation/ funding agency support for other initiatives. In the case of the ETI, the British government funded half of the costs for the first three years and this percentage has been constantly decreasing. ETI members also pay membership fees according to the size and type of organisation. For SAI, other sources of funding include income from conferences and training courses as well as grants from foundations and companies.

Other cost related issues:

In this section, financial issues regarding the outcome of the certification process are discussed.

FLO and the ETI both address issues related to financial changes required to meet the criteria/standards. In FLO, in the price paid by importers (minimum price or market price whichever is higher), a fair trade premium must also be included which

is to be paid directly to the producer (group) to cover social and ecological infrastructure activities. In the case of the ETI's principles of implementation, there is a section that states that the company ensures that human and financial resources are made available to enable meeting of commitments and that negotiations with suppliers should take into account the costs of observing the code. While the FLO criteria are far more precise compared to the vague statements in the ETI principles of implementation, they both address the issue that financial support is necessary to implement social justice and labour improvements.

III. Standards

This section involves a detailed comparison of the standards that are the backbone of all of the initiatives under study. The standards will be divided into three main categories: environmental, social and economic-institutional criteria. Under each of these categories, the initiatives will be compared across key sub-categories.

A. Environmental Criteria

In this section, the initiatives that include environmental criteria will be compared across the following key environmental issues:

1. Ecosystem health and diversity
2. Soil conservation and management
3. Water conservation and watershed management
4. Pest and disease management
5. Waste management and recycling
6. Environmental planning and monitoring systems

FLO, BBP and IFOAM all contain comprehensive environmental criteria. In contrast, the ETI and SAI 's SA 8000 contain no provisions for environmental criteria. As such, they will not be included in the discussion of this section.

1) Ecosystem Health and Biodiversity

In the area of ecosystem health and biodiversity, the following categories can be discussed: 1) general principles 2) the relationship between ecosystems on/near farms and new or expanding farms, 3) wildlife protection and conservation including landscapes and ecosystems of high ecological value, flora and fauna and habitat and finally 4) reforestation and regeneration activities.

General Principles

In terms of ecosystem health and biodiversity, all three initiatives include a broad statement about the need to conserve habitats and ecosystems. In the case of the BBP, the goal is to conserve natural habitats that should be protected, conserved and recuperated where possible. For FLO, the objective is to interact in a constructive and life enhancing way with all natural ecosystems and cycles. Ecosystems should be respected and protected. For IFOAM, one of the principle aims of organic production is to maintain genetic diversity of the production system and its surroundings, including the protection of plant and wildlife habitat.

The differences are subtle, yet fundamental. For BBP and FLO, natural habitats should be protected and conserved. For IFOAM, the habitat within the farming system (and beside it) is the focal point. It should be noted that IFOAM recommendations (3.3.1) do ask for the facilitation of biodiversity and nature conservation on a minimum percentage of the farm area. The BBP criteria are focused much more on biodiversity of threatened and endangered species and habitat.

IFOAM includes a standard (BS 4.3.1) for diversity in crop production, emphasising the need for sufficient diversity taking various pressures and objectives into account. FLO also addresses agricultural diversification in its criteria whereby the producer is required to demonstrate progress on agricultural diversification in order to reduce the monoculture characteristics of the plantation. In the Better Banana Project standards, there is no mention of agricultural diversity; however, the CAN general standards (1.4) call for using polycultures where practical – which could more easily be applied to crops such as coffee and cocoa.

Ecosystems on/near farms and new or expanding farms:

With regard to the relationship between natural ecosystems and the farm, all three systems include clear standards prohibiting the clearing of primary forest. The BBP also prohibits deforestation. For BBP, new farms cannot be established in areas with primary forest or advanced stages of secondary forest while FLO's criteria cover virgin forest, areas protected by national law and other areas of high ecological value.

BBP has the most comprehensive set of indicators including a map, also required by FLO, and a programme for conservation and recuperation of different ecosystems with boundaries of critical habitats, the inclusion of forested areas into protected areas and a policy prohibiting hunting, among others.

Wildlife protection and conservation:

All of the three systems list special ecological systems that should be prioritised for conservation and should be given special consideration. For the BBP, these include strategies to protect and recuperate threatened and endangered species and habitats including an Environmental Management Program based on the IUCN Red Book (IUCN 2000), no agriculture in parks, refuges, corridors or buffer zones, no hunting or commercial collection of flora and fauna except for regulated programmes, subsistence communities and those allowed under national laws. For FLO, the list is less extensive in the range of uses but includes virgin forests, protected areas, lagoons, swamps, surface water bodies and springs. For IFOAM, the list is extremely extensive in ecosystem coverage including extensive grasslands such as moorlands, reed land or dry land, extensive pastures, meadows, extensive orchards, hedges, hedgerows, groups of trees and/or bushes and forest lines, ecologically rich fallow land or arable land, ecologically diversified field margins, waterways, pools, springs, ditches, wetlands and swamps and areas with ruderal flora. While the ecosystems and fragments mentioned by IFOAM are more extensive than the BBP list or the FLO list in terms of agroecological systems as might be expected, both FLO and IFOAM also mention a number of water ecosystems.

IFOAM also recommends that certification bodies set standards for a minimum percentage of the farm area to facilitate biodiversity and nature conservation.

Reforestation/regeneration activities:

Of the three initiatives, BBP and FLO have standards on regeneration and/or reforestation, with BBP being the most comprehensive and detailed. IFOAM does not include such a category though one could interpret organic agricultural systems in general as regenerative systems through their role in increasing soil organic matter, fertility and microbial activity among others.

The BBP standards are the only ones to explicitly require re-forestation where possible. This is especially relevant for areas currently not in production and not suitable for cultivation such as roads, riverbanks and ravines. Furthermore, BBP, prohibits the use of illegally obtained wood to make pallets or for construction and requires especially dedicated areas for firewood cultivation to be established.

Both BBP and FLO require buffer zones for growth of native species or other appropriate vegetation. One of the functions of such buffer zones is to reduce air drifting of pesticides. In both cases, buffer zones are encouraged along rivers and other water sources and between the plantation and inhabited or working areas. FLO sets time lines for the implementation of some of its criteria in this category; for example, within 2 years, buffer zones are planted with native or other appropriate vegetation. FLO criteria also set a 20-metre buffer zone along virgin forest where no agricultural activities are to take place after one year.

2) Soil Conservation and Management

In terms of soil conservation and management, the initiatives can be compared in terms of erosion control requirements and in terms of their use of fertilisers.

Erosion Control:

All three initiatives suggest that lands must be suitable for the proposed crop. In the particular case of bananas, FLO specifies that no banana growing should be undertaken on slopes steeper than 60 degrees; on slopes of 30-60 degrees proper erosion prevention measures are to be taken (FLO Appendix). All three initiatives require soil conservation practices to sustain long term productivity, fertility and promote biological activity.

In the standards of IFOAM, slash and burn agricultural techniques are restricted to a minimum. BBP also requires a soil conservation plan; this would be similar but more formalised than IFOAM's fertilisation programme and the work plan for FLO to move towards compliance of the criteria.

FLO's standards with regard to erosion control are much more based on water issues than either the BBP or IFOAM. These include requirements for adequate drainage, drains to run along the contour on sloping land, regular maintenance of drainage channels where the sides of the channels are to be covered by vegetation (within one year). Furthermore, FLO and BBP criteria require vegetative cover crops to be planted between the rows of new banana trees. This is similar to IFOAM's standards on diversity in crop production (BS 4.3) recommending appropriate coverage of the soil for as much of the year as possible with diverse plant species.

Use of fertilisers:

One of the fundamental differences between the three initiatives addresses the issue of fertilisers. While organic agricultural standards prohibit synthetic fertilisers, both the BBP and the FLO standards allow certain synthetic fertilisers under controlled conditions with a view towards its minimisation. While both call for reduction/elimination of synthetic fertilizers, FLO criteria are slightly stronger in moving towards alternative strategies with precise time lines from inscription, covering the introduction of alternative techniques, the phasing out of conventional strategies and chemical product use.

BBP stresses that the application of fertilisers must maximise their incorporation into the soil and reduce loss from run-off, while FLO prohibits their application in buffer zones and within a 2-metre strip bordering primary and secondary drainage channels after one year. BBP and FLO both also encourage the use of organic fertilisers, mulch and compost where practically appropriate.

3) Water Conservation and Watershed Management

Under the category of water conservation and watershed management, each of the three initiatives has a special section in the standards on water conservation.

IFOAM's standards are the most general, linking soil and water conservation together. This is to be strengthened through the standards of each certification body.

Both FLO and BBP cover this issue extensively. Both require buffer zones along watercourses. Both also require that residual water from mills, washing facilities and packing stations be treated and/or filtered (for FLO, within two years).

With respect to pollution sources, BBP standards state that all sources of pollution and contamination are to be eliminated or reduced to legal levels. In the case of FLO, the general criterion states that all water resources have to be adequately protected from pollution by chemicals. FLO's criteria for both collective organisations and organisations dependent on hired labour state that any preparation or mixing of agrochemicals or cleaning of spraying equipment must be done on solid ground (requiring cement floors and a drain) within three months of inscription.

In the case of the BBP, detailed indicators are identified that also require impermeable floors for agrochemical storage areas and workshops. Other considerations include the need for retention barriers, clean-up materials and equipment in the case of spills and the washing of agrochemical-contaminated equipment.

With respect to pollution, IFOAM's criterion (BS 4.7.5) requires appropriate stocking rates that do not lead to land degradation and pollution of ground and surface water.

In the case of both BBP and FLO, a significant statement is that changing the course of streams or significantly altering the natural hydrology is prohibited. IFOAM's standard that excessive exploitation and depletion of water resources are not allowed could also cover the same issue.

4) Pest and Disease Management

The Category of pest and disease management can be broken down into a number of sub-categories mainly centred on the issue of agrochemicals. These issues include agrochemical use, handling, transport, storage and application and, finally, other methods of pest and disease management. In this section, IFOAM's criteria do not cover agrochemical use, handling, storage or application as they are prohibited. However, BBP and FLO have comprehensive coverage on these issues.

Agrochemical Use:

As was mentioned above, in IFOAM standards, the use of synthetic herbicides, fungicides, insecticides and other pesticides is prohibited. This contrasts with the BBP and FLO standards that permit controlled and limited agrochemical use.

Both FLO and BBP do prohibit certain agrochemicals. For example, they both forbid the use of Dirty Dozen chemicals listed by the Pesticide Action Network. FLO and BBP prohibit the use of chemical products black-listed by international agreements. In the case of FLO, WHO class 1 a + b pesticides are prohibited as are all pesticides in the FAO/UNEP Prior Informed consent procedure. The CAN's BBP prohibits most of these pesticides and those that are not are strongly discouraged. For BBP all synthetic chemical products must be registered for use on the particular crop and approved by the US EPA, EU as well as national agencies.

FLO and BBP have defined clear goals towards the minimisation and reduction of the use of agrochemicals. In the case of BBP, farmers must demonstrate continual reductions in toxicity and quantity of chemicals used. For FLO, the use of agrochemicals must be minimised by replacing pesticides with organic and biological control (process criteria). This will be examined in more detail in the section on other methods of pest and disease management.

FLO is more specific in its general criteria in terms of limiting chemical use. For example, in FLO criteria, the use of all herbicides is forbidden, as is the chemical Tremox for post-harvest treatment. FLO criteria also stipulate that Thiobendazol can only be used in a treatment programme with at least 50% of less persistent agents after one year. FLO criteria also authorise the use of nematicides in granular form only after non-chemical and biological control measures have been ruled out. A BBP indicator prohibits the use of soil disinfectants with high residual properties, such as methyl bromide.

Handling and Transport of Agrochemicals:

With respect to the handling and transport of agrochemicals, BBP and FLO criteria stress information and training of workers/farmers. All also require that proper equipment be used in the handling of agrochemicals.

Another similarity between FLO and BBP is that both prohibit workers under the age of 18 from handling agrochemicals. BBP also list other groups of people including pregnant women, mentally unfit, illiterate and people with respiratory diseases among others, as being barred from such work.

BBP stresses the utilisation of best management practices in these activities and also addresses extensively issues of transport of agrochemicals while FLO criteria do not address these issues.

Agrochemical Storage:

With regard to agrochemical storage, both the Better Banana Project and FLO, stipulate in their standards the need for special areas dedicated solely to the storage of agrochemicals. While FLO criteria state that these areas must be protected from sun, wind and rain, BBP criteria state that they must be stored in appropriate areas exclusively designed and designated for such purposes. For FLO this must be implemented within three months by plantations and within 1 year for collective organisations. The BBP has developed detailed indicators for locating storage areas and conditions, and organisation of storage facilities, for agrochemicals. In both FLO and BBP standards, the storage area must also be away from housing, processing, rivers and other water sources among others. Another similarity is the minimisation of inventories of chemicals in both BBP and FLO criteria.

FLO criteria also requires that the storage area must be under the close supervision of a storage manager when open, and that it must be locked when he/she is not present.

Application of Agrochemicals:

Regarding the application of agrochemicals, in the case of FLO (plantations) and BBP standards both state that there is a need for justification and documentation of the application (and dosage) of all agrochemicals. In all cases, be it integrated pest management (IPM) (BBP) or integrated crop management strategy (ICM) (FLO), the application of agrochemicals must be regulated and monitored. The monitoring system is also required to monitor pest population levels.

In this section, the BBP focuses its requirements on health and safety considerations for workers in terms of the availability of equipment showering and dressing areas and the need for a well-illuminated and ventilated area for opening insecticide treated bags if used. FLO covers these issues in the occupational health and safety criteria (see social criteria).

FLO and BBP address aerial spraying. In the case of the BBP, steps are taken to protect workers, communities and the environment from the negative effects of aerial fumigation by defining appropriate safe re-entry periods and precautions. The BBP has also developed safety measures for aerial fumigation including communication of the itinerary of applications, appropriate management systems, requirements for the loading and washing sites of the aeroplanes, the location of the airport. Also, the aerial spraying over natural bodies of water is prohibited. BBP criteria also require different safety gear and clothing according to the class of agrochemical being used, and has special requirements for flagmen. FLO minimum criteria allow aerial spraying only in the case of fungicide applications. The use of flagmen, however, is not allowed. For FLO, organisations structurally dependent on hired labour must progressively reduce the application of aerial fungicides to a level at least 25% below the regional standard used by non-Fair Trade production over the last three years.

Again, both BBP and FLO have special provisions for pesticide-treated bags. In the case of the BBP specially designated and designed areas for opening the bags are required and the indicators for this are extremely detailed. In the case of FLO, the use of such bags must be reduced and eventually eliminated within two years of inscription unless it can be demonstrated that commercial banana production in the region is impossible without impregnated bags.

IFOAM criteria do mention that if equipment from conventional farming systems is used, it must be properly cleaned and free from residues before being used on organically managed areas.

Other Methods of Pest and Disease Management:

IFOAM, FLO and BBP all cover the issue of other methods of pest and disease management. Given that IFOAM prohibits all synthetic agrochemicals, all of its standards on agricultural production rely on other methods of pest and disease management. In the case of both FLO and BBP other methods must be applied in co-ordination with a programme to reduce agrochemical use.

In the BBP programme, integrated pest management must be used to emphasise physical, cultural, mechanical and biological practices to control pests. In FLO criteria, integrated crop management must be used. In the case of collective

organisations, farmers should show progress towards ICM techniques and, in the case of plantations, an ICM system must be in place.

With regard to specific strategies, IFOAM recommendations include preventative cultural techniques which limit the development of weeds, pests and diseases as well as thermal control. Products used for such control that are prepared at the farm from local ingredients (plants, animals, and microorganisms) are also allowed. The range of alternative control mechanisms that can be used in each of the initiatives are in most cases similar (biological control, cultural control, physical/mechanical control etc.).

In the case of both FLO and BBP, other methods are to be used as far as possible balancing production and economic viability with environmental protection. In the case of IFOAM, a commitment has already been made to organic farming systems and pests, diseases and weeds are to be minimised within that context.

Both FLO and BBP state that there must be a gradual substitution from agrochemical controls to biological and physical pest control measures as well as a continuous shift towards organic fertilisers. FLO minimum criteria in the case of plantations, include the employment of at least one agronomist or technician to be in charge of the ICM system. The producer organisation must also conduct workshops in ICM. Also, in the process criteria, there must be a gradual substitution from agrochemical controls to biological and physical pest control measures as well as a continuous shift towards organic fertilisers.

5) Waste Management and Recycling

All three initiatives have criteria in their standards that relate to waste management and recycling.

All systems encourage reduction of waste, reusing materials and recycling where possible. BBP criteria are more specific in spelling out how different materials should be treated (i.e. plastic, paper, wood, metals and glass to be recycled, organic wastes to be reused).

With regard to different kinds of waste, all systems detail that organic waste should be used as organic fertiliser where possible. In terms of dangerous wastes, both BBP and FLO address this issue by requiring special treatment for such waste including chemical containers, unused pesticides and plastics. Such special treatment must ensure that natural ecosystems are not harmed. FLO and BBP criteria also require that reusable materials should be reused or returned to suppliers where possible. IFOAM standards do not address hazardous waste. With respect to non-hazardous, non-organic waste, both FLO and BBP require that this be disposed of adequately (landfill or incinerators in the case of BBP, burying or other in the case of FLO). Also in both FLO and BBP criteria there is a requirement that all waste be collected and that the plantation be clean.

Reduction of inputs by using renewable resources in locally organised production systems is an objective in the standards for both IFOAM and FLO. BBP standards address the issue by requiring a reduction in the use of contaminating materials and substances and that waste management plans start with efforts to reduce inputs by changing management systems and purchasing practices.

With regards to water, both FLO and BBP prohibit the accumulation of wastes near any water body. BBP standards also address the reuse of process waters for irrigation, not mentioned in the other systems.

BBP standards require that a waste management plan be in place. While FLO does not explicitly require this, the process criteria require the demonstration of a reduction in the use of resources. No such plan is required in IFOAM at the Basic Standards level. However, IFOAM addresses a number of issues that the other initiatives do not. These include the reduction of packaging where possible, the restriction on only polyethylene and polypropylene-based plastics, and the emphasis on the end product being fully biodegradable.

6) Environmental Planning and Monitoring Systems

This section on environmental planning and monitoring systems will be divided into two sections, though it must be understood that there is a direct link between an environmental plan and the monitoring system in place to operationalise it.

The standards of all three initiatives require environmental plans. The kind of plan found in the standards can be separated into two categories: overall plan and plans specific to certain issues raised in the standards.

Both FLO and BBP require an overall plan applicable to all areas of functioning of the producer's operations (or producer group). In the case of BBP, the producer plan details objectives, goals, responsibilities and activities for social and environmental improvement in the short, medium and long term. In the case of FLO, the requirement is for a premium work plan to be drawn up every year with the aim of maintaining compliance with the minimum requirements and working towards full compliance with process requirements (including the environmental requirements). Such a work plan is required from both collective organisations and plantations.

In IFOAM standards, there is no requirement for an overall plan; however, at the certification level, the IFOAM accreditation criteria for indirect certification (grower groups) require an evaluation of the internal control system records. This will be discussed in more detail below.

In terms of plans on specific issues that will most likely be incorporated into the larger overall plans, BBP requires a waste management plan. FLO requires an integrated crop management strategy (more specific in the case of plantations than collective organisations) including elements of agrochemical regulation and the integration of other methods of crop management while the BBP requires an integrated pest management plan and a monitoring and evaluation system in place for the regulation of agrochemicals. It is generally understood that to meet IFOAM criteria a balanced fertilisation programme should be in place.

With regard to issue-specific plans, IFOAM standards require a conversion plan where the entire area is not already under organic production and certification.

Monitoring:

The overall plans described above must be placed in the context of a monitoring system.

The Better Banana project is explicit in its standards that a system must be in place to monitor environmental impacts (according to the size and intensity of the production systems). It also requires that the monitoring system be periodic and able to produce information for revision of the plan if needed. The monitoring system will demonstrate compliance with the BBP standards and continual improvement of the social and environmental character.

In many regards, this monitoring system is very similar to the internal control system for indirect certification (grower groups) in IFOAM's accreditation criteria. Linked to the periodic nature of the BBP system, the internal control system – internal inspections must be carried out at least annual for all operators and that these inspections must adequately address the compliance of all operators with the standards. This is an extremely worthwhile system as skills are developed internally in the producer group to manage such a system; information is increased, as are communication flows. Finally, the external inspection for certification can be carried out with less expense by mainly verifying the internal control system.

In the case of FLO, while the integrated crop management strategy does require monitoring, especially with regard to agrochemical use and justification, there is no explicit requirement for the overall monitoring of the premium work plan. It is most likely assumed as understood that the producer will necessarily require a monitoring system to implement the plan. The work plan must be approved by the producer members or representatives and management every year and it must be implemented though there are no explicit vehicles laid out as to how this should be done.

While an explicit monitoring system per se is not in place to review the work plan, FLO's standards contain explicit references to responsibility to oversee specific management plans and activities. For example, in both plantations and collective organisations, a responsible person must be in charge of the integrated crop management plan and a responsible must be named for planning and implementing the environmental criteria.

The following chart (next page) provides a summary for the environmental criteria comparison between the BBP, IFOAM and FLO. Checkmarks indicate coverage of an issue and the right hand column shows the minimum common criteria shared by the three initiatives. The larger checkmarks in a given row indicate most comprehensive coverage of a particular issue.

Chart: Environmental Criteria

Issue	Area:	B	F	I	Minimum Common Criteria
Environmental		B	L	F	
		P	O	O	
				A	
				M	
1) Ecosystem Health and Diversity: A General Principles		✓	✓	✓	Ecosystems and natural habitats should be protected
B Ecosystems on/near farms and new or expanding farms		✓	✓	✓	clearing of primary forest is prohibited
C Wildlife Protection		✓	✓	✓	high ecological value ecosystems shall be protected
D Reforestation/Regeneration Activities		✓	✓	✓	certain areas of the farm designated for reforestation or regeneration activities (for BBP- all areas not suitable for cultivation, for FLO - buffer zones and IFOAM recommends a minimum % of the farm area)
2) Soil Conservation and Management A Erosion		✓	✓	✓	Soils must be suitable for the particular crop; measures taken to reduce soil erosion; soil quality and fertility should be improved
B Use of Fertilisers		✓	✓	✓	use of organic fertilisers is encouraged
3) Water Conservation and Watershed Management		✓	✓	✓	water resources are to be conserved; measures shall be taken to avoid or eliminate pollution of water
4) Pest and Disease Management A Agrochemical Use		✓	✓		Reduction in the use of agrochemicals (prohibition in the case of IFOAM)
B Handling/Transport of agrochemicals		✓	✓		
C Agrochemical Storage		✓	✓		
D Application of Agrochemicals		✓	✓		
E Other Methods of Pest and Disease Management		✓	✓	✓	Integrated management techniques are to be used – preventative methods as well as methods such as biological and mechanical control
5) Waste Management and Recycling		✓	✓	✓	Integrated waste management system in place to reduce the use of non-renewable resources and to properly reuse, recycle or dispose of types of waste
6) Environmental Planning /Monitoring Systems A Planning		✓	✓	✓	Environmental management plan required (in IFOAM, only in the internal control system required of grower groups and during a conversion period)
B Monitoring		✓	✓	✓	Monitoring system to be in place to evaluate progress of the management plan (again in IFOAM, this is only seen in the above categories)

B) Social Criteria

All five initiatives cover social issues. While the coverage of these issues in the initiatives varies widely, they will all be compared across the criteria. The social criteria can be divided into the following categories:

1. Right to Freedom of Association and Collective Bargaining; Worker Participation in Decision-Making
2. Minimum Wage/Return, Social Security
3. Equity in Wages and Non-Discrimination
4. Specific Protection of Certain Categories of Workers (children, disabled, pregnant women)
5. Safety and Health at Work
6. Basic Needs
7. Relations with Local Communities and Indigenous Rights
8. Company Policies

1) **Right to Freedom of Association and Collective Bargaining; Worker Participation in Decision-Making**

In the first category of right to freedom of association and collective bargaining, all of the initiatives address this issue on the basis of ILO conventions (87 and 98). Worker participation in decision-making is also added to the category; while this moves beyond the first category, it can be understood as a progression along the same direction. Finally, the related issue of the right to freely enter into employment will also be covered.

It should be noted that IFOAM's social criteria in this area are extremely vague. For example, the IFOAM (BS 10), that relates to this issue, states that all ILO conventions relating to labour welfare should be complied with. While this could potentially be very strong, it is lacking a strong applicable context. The other initiatives cover a number of specific issues.

One issue covered explicitly by FLO, BBP, SAI and ETI is the right to freedom of association. All state that workers have rights to organise and/or form unions. In the case of FLO criteria, this applies to both collective organisations in their role as employers and plantations. SAI, ETI and FLO explicitly state that there will be no discrimination of representatives of organised workers and that these representatives will be allowed to carry out their functions. BBP covers this issue in a slightly different way by stating that workers rights to organize and voluntarily negotiate with management must be guaranteed and that no pressure will be put on the worker interested in belonging to a union.

SAI and ETI envisage cases where such rights to freedom of association are curtailed by national law. In these cases, these two initiatives, require that parallel processes of association and collective bargaining be facilitated by the employer.

There is a statement made in the BBP criteria that is not found elsewhere under this category regarding access to information. This standard states that the company must inform employees in advance about planned farm management or organisational changes and the possible social, environmental, and economic impacts of these changes.

Apart from these issues, FLO moves beyond the other initiatives in terms of the comprehensiveness of the issue of participation in decision making and in collective bargaining. For example both the plantations and collective organisations must hold permanent training activities aimed at improving worker representation. As well as this, collective organisations are to undertake education activities to enhance the participation of members. With regard to collective organisations, these are defined as democratically organised with organisational structures that guarantee control by members. A general assembly is the highest decision making body. The goal of these activities towards participation is to ensure that the premium work plan is developed and approved with active participation from all parties.

Furthermore, FLO standards not only recognise the right to collective bargaining but put this into practice with the requirement that a collective bargaining agreement (or terms of employment document in the case of collective organisations where no union exists) be drawn up and approved by all parties to include labour conditions such as salary, working hours, social security, dismissal, vacation, sickness, maternity and minimum wage. Similarly, the presence of a union is a requirement for plantations except in exceptional circumstances.

Right to freely enter into employment:

The right to freely enter into employment is addressed specifically by FLO, SAI, the BBP and the ETI but only through the vague statement above for IFOAM. FLO and BBP standards simply require that forced labour (including bonded) does not occur (based on ILO conv. 29 and 105). This is also the case with SAI SA 8000 and the ETI though their standards also state that personnel should not be required to lodge deposits or identity papers upon commencing employment. For FLO, this is included as a verifier. ETI also states explicitly that employment is freely chosen including involuntary prison labour with forced and bonded labour as being prohibited.

2) Minimum Wage/Return, Social Security

In this section, the sub-categories of minimum wage/return, social security, hours of work and basic treatment will be examined.

Minimum Wage/Return:

Apart from the general coverage of IFOAM's social standards, the other initiatives specifically address the issue of minimum wage or return. In the case of the BBP, FLO, SAI SA 8000 and the ETI, all have standards that require wages to be equal to or greater than the established minimum legal wage and/or the average regional (or industry) salary.

SAI and the ETI both address the issue of deductions, stating that deductions should not be made for disciplinary reasons.

Regarding the access to and understanding of the worker of his/her wage, a number of initiatives have requirements to address these issues. Both FLO and SAI have requirements on the form of payment; in the case of FLO this must be in legal tender and properly documented and in the case of SAI this must be rendered in cash or cheque in a manner convenient to workers. Both SAI and the ETI have requirements as to the provision of clear information regarding the wages and benefits. For the ETI, this is to be detailed before employment and for each pay period. BBP states that wages must be paid in full and accompanied by a detailed

and understandable breakdown explanation. In the case wages have been negotiated through collective bargaining, a copy of the agreement is attached to the hiring procedures.

Finally, three initiatives, FLO, SAI SA 8000 and the ETI, go beyond the minimum wage requirement. For SA 8000 and the ETI, an added qualifier for the minimum wage is that this shall be sufficient to meet basic needs (defined by SAI as being sufficient for the worker and his/her dependants to feed, cloth and house themselves with no need for overtime). Furthermore, for both the ETI and SAI SA 8000 wages should be enough to provide some discretionary income. SAI SA 8000 guidance document includes detailed tools for such analysis including quantitative and qualitative methods for wage analysis (poverty line assessment, market basket survey, and comparisons with unionised companies and worker consultations) and the application of a basic needs formula. Information exchange and learning between the initiatives under study here regarding developing detailed social auditing techniques could potentially be quite useful.

FLO tackles the issue of minimum wage in a unique way, through a social premium to be added onto the final price of the product and to be paid directly to producers (exporters) by the importer. How this social premium is used is decided by the members of the collective organisation or the union and management, in the case of plantations, through the drafting of an annual premium work plan. The premium can also be used for increased salary support for workers and members if these are below the industry and regional average. This is to be added on top of the basic wage described above.

A final point to make in this section is the unique requirement in the ETI base code for negotiations with suppliers to take into account the costs of observing the code. In this way, the social costs are internalised into the supply chain cost structure.

Social Security:

All five initiatives address social security issues, though in different ways. SAI and ETI approach this issue by prohibiting practices that would avoid payment of social security benefits by employers. For example, in SAI SA 8000 and ETI standards, labour-only contracting arrangements and false apprenticeship schemes are not to be undertaken to avoid fulfilling obligations to personnel. ETI also covers home-working arrangements.

With the schemes that define content issues to be addressed under social security, FLO, IFOAM and BBP each have a different approach. IFOAM's criteria state that social security needs should be met including benefits such as maternity, sickness and retirement benefit. For FLO criteria, these issues and others are to be included in the Collective Bargaining Agreement (or terms of employment document for collective organisations with no union) which is to be re-negotiated every year. Added to this minimum criteria, norms for organisations structurally dependent on hired labour require that permanent workers, within one year from certification, have the benefits of a provident fund or pension scheme, maternity leave with pay for at least 12 weeks and social security provisions.

BBP requires the company or producer to implement a social policy in compliance with national labor laws, international agreements and the standards of the certification program.

One final point to be made is that the ETI includes the provision of regular employment in its standards.

Hours of Work:

With regard the number of hours of work per week, all initiatives except IFOAM cover this explicitly.

SAI, BBP and ETI require that working hours comply with applicable national laws and industry standards. In any case, they all state that 48 hours/week is the maximum regular level if not the level set by the applicable law. In addition, workers are provided with at least 1 out of 7 days off. All three allow room to extend working hours on a voluntary basis to a maximum of 12 hours of overtime work per week in exceptional circumstances. In the SA 8000 standards, this is defined as short-term business circumstances that are unforeseeable. In all cases, such overtime work is compensated at a premium rate.

FLO's criteria for work hours apply to employees not producer farmers. In the case of FLO the issue of hours of work is to be addressed in the collective bargaining agreement, a requirement to be negotiated on an annual basis.

Basic Treatment:

Basic treatment is not covered by all the initiatives. In those systems that do cover it including IFOAM, SAI SA 8000 and the ETI, basic treatment of human beings is upheld including the prohibition of violations of basic human rights including corporal punishment, mental, physical and verbal abuse. The ETI also explicitly mentions sexual harassment.

3) Equity in Wages and Non-Discrimination

Under the category of equity in wages and non-discrimination, all initiatives have standards to cover the issue; the only difference is in the degree of detail.

All standards prohibit discrimination of race/colour, gender and religion. The list does become more expansive with different possible forms of discrimination listed by different initiatives. For example, FLO includes political opinion, national extraction and social origin, while SAI SA8000 also comprises caste (more specific than social origin), disability, sexual orientation and union membership (this issue is covered under freedom of association and right to collective bargaining). The ETI and the BBP include these categories and add marital status.

All standards apply non-discrimination to wages and opportunities. SAI SA8000 and ETI are more specific in detailing all areas of coverage including hiring, compensation (wages), access to training, promotion, termination and retirement.

SAI also includes two other issues that are not explicitly covered by the other initiatives. The first states that the company cannot interfere with the exercises of rights of personnel to observe tenets or practices, or to meet needs relating to race, caste, national origin, disability, gender, sexual orientation, union membership or political affiliation. Furthermore, the company shall not allow behaviour including gestures, language and physical contact that is sexually coercive, abusive or exploitative.

Finally, one other point to be made is that FLO has a system in place for the progressive elimination of forms of discrimination, not seen in the standards of the other initiatives. The criteria require that in a chapter on discrimination of workers, the premium work plan describe the position of disadvantaged social groups, formulate a policy to abolish these detected forms of discrimination and, every year, show progress towards this goal.

4) Specific Protection of Certain Categories of Workers

All the initiatives have standards relating to the specific protection of certain categories of workers. The categories that will be addressed here include children, disabled, pregnant women and migrant or temporary workers.

Children:

In the case of children, all initiatives address child labour. All standards are based on UN conventions and the UN Charter of Rights for Children.

All initiatives explicitly state that child labour is not allowed, while it is not explicitly mentioned in IFOAM standards that recommend that the Charter mentioned above should be complied with. The actual definition of a child does raise some differences however. In most cases, children under 15 are not allowed to work (FLO, SAI, and ETI), while BBP sets the limit at 14. National country laws are applicable, for BBP and SAI, in the case they set a higher minimum age. However in certain countries that fall under the exemptions category in ILO convention 138, the minimum age for working could be lowered to 14 according to SAI SA 8000 standards and the ETI Base Code.

All initiatives, except IFOAM, show special consideration for young workers normally defined as in between 15 and 18 years of age. In all cases, young workers must not undertake hazardous work. For the BBP, this is defined as not handling agrochemicals nor perform work requiring a great deal of physical strength. FLO states that young people are not allowed to carry out work that is likely to jeopardise their health, safety or morals. In SA 8000 standards, children or young workers are not exposed to hazardous, unsafe or unhealthy situations. ETI states that children and young persons under 18 are not to work at night or in hazardous conditions. The BBP requires work hours to be restricted to 8 hours a day and 42 hours per week and that the companies contracting minors should keep full records of their names, ages, class of work, schedule, etc.

A further consideration that FLO, ETI and SAI SA 8000 share is that any work undertaken by young people should not jeopardise schooling. SAI's standards are very detailed here stating that "policies and procedures to promote education for children and young workers subject to local compulsory education laws or in attendance at school, are established, documented, maintained and communicated to personnel and other parties". In addition, "the combined hours of transportation, school and work does not exceed 10 hrs per day".

Both SAI and the ETI also have special procedures for the phasing out of employment of children when detected. Both require programmes to be in place to enable such children to attend and remain in school until no longer children. SA 8000 states that this might include compensation for lost salary, covering the costs for tuition-related expenses or offering to hire relatives of the children.

Disabled:

In most cases, there are no specific criteria relating to the disabled as a special category of workers. It should therefore be assumed that any such protection would fall under the general non-discrimination clause. The only systems that address disabled workers are BBP and FLO with similar indicators prohibiting workers who are mentally unfit, or who have chronic diseases, respiratory diseases or weaknesses to handle agrochemicals.

Pregnant Workers:

With respect to pregnant women, there are no direct references in the standards of the initiatives except in the case of FLO where maternity leave is to be negotiated as part of the collective bargaining agreement and in plantations' criteria where this is strengthened with the requirement that maternity protection be equal or greater than national legislation with maternity leave with pay being at least 12 weeks for permanent workers.

This is not to say that there is not consideration of pregnant women in the standards of the other initiatives. For example, a BBP indicator states that pregnant or nursing mothers cannot be fired without serious and unrelated cause and that they are not to handle agrochemicals. IFOAM criteria suggest that maternity benefits should be met. SA 8000 guidance states that no forced testing, use of contraception or forcing pregnant women out is allowed nor is increasing their work loads to pressure them to resign. The ETI does not refer to pregnant women in any way other than through coverage in the general non-discrimination clause.

Migrant/Temporary Workers:

Only two of the five initiatives address special protection for migrant and temporary workers directly: FLO and BBP. This may be due to the significance of this social issue in the agricultural sector, a sector in which FLO and BBP have considerable experience.

Better Banana Project standards state that each worker, whether permanent, temporary or part time is provided a written contract and that all foreign workers hired have a work permit issued by the competent government agency. These workers must also be guaranteed the same rights, benefits and wages as permanent employees.

In the case of FLO, it is acknowledged that there may be differences in the wages and benefits between permanent, casual and seasonal workers in the collective bargaining agreement but that these differences must be progressively diminished in the process criteria.

In all cases, the general non-discrimination clause will apply and this is further strengthened in the national origin or extraction clause. Both the ETI (through pilot project results) and SA 8000 (in developing its agricultural supplement) are currently examining how to address specifically the issue of migrant and temporary workers

5) Safety and Health at Work

All five initiatives address occupational health and safety. They include general standards on the requirement to provide a safe and healthy working environment.

BBP requires that the social policy include a specific policy on occupational health approved by top management and known to all workers. An occupational health committee has to be set up in production units with more than 10 workers. Similar provisions are found for FLO, SAI and ETI, where either a worker representative or a senior management representative is appointed responsible for the health and safety of all personnel.

With regard to prevention of accidents and dealing with emergency situations all initiatives, but IFOAM, require that a system or policy be in place to prevent accidents and minimise as far as is reasonably predictable, the causes of hazards.

All initiatives, except IFOAM, have standards that cover the need for adequate training of workers and provision of information on issues related to occupational health and safety including the use, handling and storage of agrochemicals (FLO and BBP) as well as the use of tools, machinery and equipment (FLO and BBP). SAI and the ETI have a more generalised standard linking the training required and other activities to be linked to the hazards that are inherent in the working environment. They also stipulate that such training programmes should be repeated for new or reassigned workers.

In terms of the working environment, the Better Banana Project, the ETI and the SAI SA 8000 standards require the provision of basic services such as potable water, dressing rooms and sanitary facilities (including bathing facilities in the case of BBP). IFOAM also explicitly mentions in its recommendations that labour conditions regarding noise, dust, light and exposure to chemicals should be within acceptable limits.

With regard to protective equipment (in the case of agrochemical application), IFOAM, BBP and FLO all require that workers be provided with adequate protection.

BBP standards are the only ones to require regular medical checks for workers handling agrochemicals.

6) Basic Needs

The category of basic needs can be divided into general statements, housing considerations, medical care and education. All initiatives cover at least one of the above issues though not in considerable detail.

General Coverage of Basic Needs:

IFOAM, SAI and the ETI include basic needs in their standards. For SAI and ETI, it has already been discussed that wages of workers must be sufficient to meet their basic needs (ability to feed, house and clothe workers and their families without the need for overtime work – SAI) and to provide some discretionary income. This is also raised with regard to the provision of housing (see below). In the case of IFOAM, Basic Standard #1 states that one of the principle aims of organic agriculture is to “allow everyone involved in organic production and processing a quality of life which meets their basic needs...”

Housing considerations:

Under housing all of the initiatives, except IFOAM, address the issue by requiring that housing, if provided to workers, should be clean and safe, or in other words dignified.

SAI and the ETI state that such housing should meet the basic needs of workers. The ETI is examining how to address the issue of housing more fully, particularly where on-farm or on-plantation housing is provided. IFOAM does state in a recommendation that all employees and their families should have access to potable water, food, housing, education, transportation and health services but does not stipulate whose responsibility this is nor does it comment on the quality of such services.

BBP covers the issue extensively by stating that workers residing at the production unit must be provided with adequate housing complying with all safety and health requirements. Specific provisions also cover the location of the buildings and that no agrochemical drift contaminate the inhabited areas.

FLO criteria simply state that if housing is provided, it must not be in a discriminatory way.

Medical Care:

With regard to medical care, the BBP, FLO and IFOAM address the issue directly. SAI and the ETI do not address this issue directly though in the health and safety section, SAI (and to a lesser extent, ETI) requirements imply that medical care is available if needed through the health and safety system in place.

IFOAM standards recommend that employees should have access to health services while the Better Banana Project standards explicitly state that workers and their families must have access to medical services and that workers handling agrochemicals are subject to regular medical checks. In the case of FLO's criteria, sickness and related issues are to be covered under the collective bargaining agreement (or collective labour contract).

Education:

Education will be differentiated from training covered in the safety and health at work category and from education for children covered in the child labour sub-category. Given this, BBP standards require and IFOAM recommends that employees and their families have access to education opportunities. With regard to environmental education, both FLO and BBP standards state that this should be provided. BBP standards also require that families have access to entertainment.

7) Relations with Local Communities and Indigenous Rights

IFOAM and BBP cover the category of relations with local communities and Indigenous Rights. While SAI and the ETI may rely on external support from trade unions and NGOs in verification, there are no criteria for how the company deals with local communities and indigenous communities outside of the workplace. In the case of FLO, as its main goal is to benefit disadvantaged producers, some of these producers will be indigenous producers who in effect constitute the local communities. IFOAM Basic Standards include a recommendation stating that the rights of indigenous peoples are to be respected. The only initiative with any detailed standards on these issues is the Better Banana Project.

The Better Banana Project's standards include issues of community consultation where their interests must be considered when agricultural activities directly affect them. There are also a number of activities that should be jointly undertaken between

the producers and the community, including the protection of community watersheds and forests as well as contributions to local economic development. With respect to employment and training opportunities, priority should be given to local communities.

With respect to areas of special significance, BBP standards require the preservation of these. Interestingly, FLO's criteria also include the conservation of areas of high cultural value.

8) Company Policies (Training, Planning, Monitoring, Corrective Actions, Accountability)

In this section on company policies, only policies relating to social aspects will be covered. Company policies will be broken down into general issues, training, planning and monitoring as well as corrective actions though it should be noted that many issues flow fluidly back and forth between these categories.

General Issues:

A number of the initiatives include general policies regarding social issues in their standards. For IFOAM, while there is no general policy for producers and companies, certification programmes conducting inspections and certifications must have a policy on social justice. SAI also has a general policy regarding management systems requirements stating that top management is to define the company's policy for social accountability and labour conditions including a commitment to continual improvement among other issues. The main vehicle for general policies in the FLO standards is the premium work plan. In this plan, policies on non-discrimination of workers, disadvantaged social groups, training to improve the representation of workers and awareness of Fair Trade principles and the use of the premium for salary increases above basic wages are to be in place. BBP requires the company to issue a Social Policy and a Code of Conduct documenting the rights and obligations of workers.

Training:

All initiatives, with the exception of IFOAM, have included training in order to implement the requirements of each standard. As was mentioned in the safety and health at work category, all four of SAI, ETI, BBP and FLO include training for workers related to health and safety issues.

Besides health and safety training they all include a broader requirement for training to support the implementation of the standards more generally. For example, training in FLO for both plantations and collective organisations is required to improve representation and participation in decision-making processes. In the case of SAI, under the section on management systems, training is required for new and temporary employees at all levels of the organisation towards the proper planning and implementation of the standard. The ETI encourages awareness raising as well as training so that all workers and suppliers are made aware of the code and the implementation principles and procedures. Furthermore, understanding and implementing company policy with respect to the code is to be considered as a positive measure of performance in assessment. BBP states that an ongoing and appropriate training is required on labor rights, emergency and first aid procedures, human and environmental risks posed by the use of agrochemicals.

Planning and Monitoring:

With respect to planning and monitoring all systems, with the exception of IFOAM, require overall “management” plans and policies or plans related to specific issues such as occupational health and safety. Linked to these plans, a monitoring system is generally required to be in place to evaluate and update the plans. However, not all initiatives explicitly state the need for such monitoring systems.

The environmental monitoring system of the Better Banana Project, which also includes social issues, has been described in the paragraph under the Environmental Criteria.

In the case of FLO, the main vehicle for planning is the annual premium work plan for both collective organisations and plantations. While there are requirements for this and the collective bargaining agreement to be discussed and negotiated between the management or the board and workers with farmers (members in the case of collective organisations), there is no explicit monitoring system required to be in place. However, given that many of the process criteria require continual improvements, monitoring must take place with respect to the implementation of the work plan and the collective bargaining agreement.

Given that SAI is based on a management system approach, a planning and monitoring system is required to implement the SA 8000 standard. This system includes provision for periodic review and changes where needed as well as for allocation of responsibility for the meeting of the standards through the appointment of senior management and non-management representatives.

While at an early stage, the ETI is to be based on planning and monitoring systems as well.

Corrective Actions:

In the category of corrective actions, IFOAM accreditation criteria, SAI and the ETI require that systems be in place to address such issues. For SAI and the ETI, these systems include requirements for the company to investigate and negotiate where breaches of the standards are found, requirements for confidentiality and non-discrimination for workers to report failures and requirements for the implementation of remedial and corrective action. In the case of SAI, this is generally within a company to be certified. In the case of the ETI, members (retailers) are to address breaches of the code of their suppliers. In this case, if serious breaches are not remedied immediately, then the business relationship with the supplier is to be terminated. SAI distinguishes between two scales of corrective action – major corrective actions and minor corrective actions. These and IFOAM's criteria for corrective action are discussed in the Monitoring and Control section under de-certification and arbitration.

In their standards, FLO and BBP do not explicitly require an overall system for undertaking corrective actions; at the same time FLO's premium work plan and the BBP's planning and monitoring system do address corrective action but this is not explicitly stated. At the level of basic standards, there is no requirement for a system of corrective actions. Both FLO and BBP function on the basis of continuous improvement where problems are remedied in accordance with their severity and complexity. For example, FLO, BBP as well as SAI and the ETI require procedures for corrective action in the area of occupational health and safety in dealing with accidents and emergencies. In the case of child labour, most programmes have policies for corrective action that require much sensitivity in implementation.

All programmes (except IFOAM Basic Standards) have standards in place to address corrective action within an issue specific context. SAI and the ETI explicitly require a corrective action system in place as part of a larger overall plan and IFOAM's accreditation criteria call for such a system to be in place at the certification level. In the case of FLO and the BBP, the overall plan effectively takes on this broad requirement of corrective action.

The following table highlights the minimum social criteria that are common to all initiatives. The checkmarks indicate coverage of a particular issue. The size of the checkmark is an indicator for the comprehensiveness of coverage; in other words, a larger checkmark indicates more comprehensive coverage while a smaller checkmark indicates less comprehensive coverage of a particular issue.

Chart: Social Criteria

<i>Issue Area: Social</i>	B B P	F L O	I F O A M	S A 8 0 0	E T I	Minimum Common Criteria
1) A Right to Freedom of Association & Collective Bargaining; participation in decision making	✓	✓	✓	✓	✓	Right to freedom of association and the right to collective bargaining are respected according to ILO conventions 87 and 98
B Right to freely enter into Employment	✓	✓	✓	✓	✓	Employment is freely chosen/ no forced labour
2) Minimum Wage/Return and Social Security A Minimum Wage/Return	✓	✓	✓	✓	✓	wages are to be equal to or greater than national & industry minimum wage and/or comply with ILO conventions on labour welfare (SA8000 and ETI include basic needs and discretionary income)
B Social security	✓	✓	✓	✓	✓	No avoidance national laws and regulations on SS
C Hours of Work	✓	✓		✓	✓	ETI, BBP, SAI specify max 48 hours/week, 12 voluntary extra hours/week
D Basic Treatment			✓	✓	✓	No Common minimum Criteria
3) Equity in Wages and Non-Discrimination	✓	✓	✓	✓	✓	No form of discrimination is allowed in terms of allocation of wages or other activities of the company or organisation
4) Specific Protection of Worker Categories: A Children	✓	✓	✓	✓	✓	All initiatives address the issue of child labour with standards based on ILO convention 138 and UN charter of Rights for Children
B Disabled	✓					Minimum common criteria is general non-discrimination requirement
C Pregnant Women	✓	✓	✓	✓		All initiatives except the ETI explicitly mention pregnant women but no minimum common criteria
D Migrant/Temporary Workers	✓	✓				Non-discrimination of treatment
5) Safety and Health at Work	✓	✓	✓	✓	✓	Working conditions are safe and healthy and workers are provided with adequate protection

6) Basic Needs			✓			
A General						
B Housing	✓	✓	✓	✓	✓	No minimum common criteria
C Medical Care	✓	✓	✓	✓		No minimum common criteria
D Education	✓	✓	✓	✓	✓	Promote education, particularly for children
7) Relations with Local Communities and Indigenous Rights	✓		✓			Not all initiatives address this issue
A Relations						
B Areas of special significance	✓	✓				Not all initiatives address this issue
C Land ownership/ rights						None of the initiatives address this issue
D Employment	✓					Not all initiatives address this issue
8) Company Policies	✓	✓	✓	✓		No minimum common criteria
A General						
B Training	✓	✓	✓	✓	✓	Not all initiatives address this issue
C Planning and Monitoring	✓	✓	✓	✓	✓	Planning & monitoring systems are required (for IFOAM, only at accreditation level); forms vary
D Corrective Actions				✓	✓	Not all initiatives address this issue explicitly

C. Economic and Institutional Criteria

While comparing the social and ecological content of the five initiatives is of central importance, examining them across economic and institutional criteria can be of help to better understand the priorities and values underlying the initiatives. Such criteria are not always explicitly considered in the standards; however all initiatives cover at least some of the issues raised here. The criteria for comparison in this section are:

- 1) economic viability
- 2) diversification
- 3) access to credit
- 4) time horizon
- 5) respect for legislation/principles

1) Economic Viability

Economic Viability is an issue that is not normally addressed directly through the standards. None of the initiatives directly include economic viability as a requirement, though in most cases this is implied as a basis for being able to address social and ecological issues. In the case of IFOAM, it has already been mentioned that one of the principle aims of organic agriculture is to allow everyone involved a quality of life that meets basic needs and allows for an adequate return. SAI does not explicitly address the issue and neither does the ETI. Interestingly, ETI actually requires that companies make available the necessary human and financial resources to enable the company to meet its commitments.

Both the standards of the Better Banana Project and FLO hint at the need for economic viability as one of the bottom lines. For example, in the case of integrated crop management in FLO, it is stated that this management system establishes a balance between business results and high levels of environmental protection. Similarly in the BBP standards, some environmental procedures are considered practical within the realm of economic viability. For example, agrochemicals should be used only in certain areas and in certain times to protect the farmer from economic failure. This is a more pragmatic approach as opposed to IFOAM's more ideological stance regarding the use or prohibition of synthetic chemicals.

2) Diversification

In terms of diversification, both FLO and IFOAM call for diversification; however, they are generally concerned with agricultural diversification as opposed to economic diversification, though the two can go hand in hand. FLO's draft process criteria for plantations include demonstrations of agricultural diversification. The objective here is to reduce monoculture systems on the plantation. In the case of IFOAM, one of the basic tenets of organic agriculture is diversity in crop production. It then comes as no surprise that the basic standards require sufficient diversity in time or place where appropriate. The BBP standards do not address the issue of diversification; however, the general CAN standards call for polycultures where practical, mainly in reference to crops such as coffee and cocoa.

Neither SAI SA 8000 nor the ETI discuss the issue of diversification; this is not surprising given that it is a main issue in agriculture but not necessarily in the other sectors. While FLO, IFOAM and the BBP standards were established specifically for agriculture, the ETI and SAI 's SA 8000 were not developed within such a specific framework. Nevertheless, the ETI is active in the agricultural sector and SAI is developing an agricultural supplement.

3) Access to Credit

There is no direct mention of access to credit in any of the initiatives. In the only case where credit is mentioned, SAI SA 8000 standards state that debts owed to a company by a worker cannot be used as a lever in bondage. One of FLO's objectives is to create better access to markets and credit for disadvantaged producers; although it is not mentioned directly in the standards, it is one of their fundamental characteristics.

4) Time Horizon

While time horizon is a central issue in understanding the objectives of the initiatives, this is not usually explicitly mentioned as a key issue.

For both FLO and the ETI, a main objective of the initiative is to foster long-term relationships between producers and importers (companies and suppliers). For FLO, in order to encourage the development of long term and stable relationships, an annual schedule of deliveries is to be set up. For ETI, the relationships work in the context of retailer –supplier relations and the goal is to encourage suppliers to comply with the code.

There is an implicit assumption in all initiatives that the commitment of the company/producer/organisation undertaking certification or inscription is long term. This is not unreasonable given the nature of the systems that need to be built for compliance. Both the BBP and IFOAM explicitly mention the long-term commitment in their standards. For IFOAM, a recommendation to certification agencies is that production should only be certified if it is likely to be maintained on a long-term basis. In the case of the BBP, the work plan that the producer has to develop must spell out short, medium and long-term goals, consistent with the continual improvement approach.

5) Respect for Legislation/Principles

The last section under economic and institutional criteria covers respect for legislation and principles. This will be covered through an examination of compliance with local or national laws, compliance with country of origin laws and entities, compliance with ILO conventions and compliance with other international agreements.

All five initiatives state in their standards that local and national laws of the country where production is based must be complied with. In the case where the standards and the laws cover the same issue, the ETI, SAI SA 8000, FLO and the BBP, state that the provision setting the higher standard is to be complied with. One specific example where all four initiatives address this point is the setting of the minimum wage.

SAI SA 8000 standards call for a commitment in the company policy to comply with national and other applicable law and to respect international instruments. With respect to occupational health and safety issues, the ETI, BBP, FLO and SAI SA 8000 have developed direct standards as well as ensuring compliance with national legislation and other legal instruments.

Another division addresses international trade issues where laws other than those in the country of production are to be applied. Only two of the initiatives address this issue. For the BBP, the United States Environmental Protection Agency must approve any synthetic chemical products used. SAI SA 8000 states that in the case of retailers, their local and national laws would apply – linking activities through the supply chain.

In terms of compliance with ILO conventions, all initiatives base their social criteria on these. The BBP, FLO and the SA 8000 standards explicitly stipulate compliance with ILO conventions 87, 98, 138, 29, 100, 111 and 105. SA 8000 and BBP further include ILO recommendations 146 and 164. FLO criteria require compliance with ILO Convention 110 and 155 while SA 8000 also covers ILO conventions 135, 159 and 177.

Finally in terms of compliance with other international agreements, IFOAM, the BBP and SAI cover compliance with the UN Charter of Rights for Children. SAI and the BBP also cover the Universal Declaration of Human Rights.

In the realm of conventions and agreements on pesticides, Both FLO and the BBP prohibit the Dirty Dozen of the Pesticide Action Network and the FAO/UNEP Prior Informed Consent (Rotterdam Convention). FLO also adds WHO class a + b chemicals. It is not surprising that these two initiatives cover this issue given that they both allow the controlled and minimal use of agrochemicals; either through prohibition of synthetic chemicals completely or by not addressing agricultural issues explicitly, the other initiatives do not cover international conventions on pesticides.

6) Accountability

All initiatives address the issue of accountability in their standards though this is covered in various forms. Accountability can be addressed within the internal structures of the company/plantation or producer organisation or it can be addressed in terms of external relations. Both of these aspects will be covered here.

In terms of internal accountability, FLO, SAI and the ETI require that processes to ensure accountability with the overall implementation of the standards be in place. In the case of SAI and the ETI, structures are in place, including an appointed senior management representative to be responsible for the implementation of the standard/code. There are also provisions for communication and participation of workers within the company. SA 8000 standard requires that a non-management representative is chosen from their own group to facilitate communication with management and in the case of the ETI, the code and its implementation process must be communicated throughout the company and to its suppliers.

In the case of FLO's criteria, accountability is structured into a number of requirements. In the case of collective organisations, these organisations must have a democratic structure with a General Assembly acting as the highest decision-making body with all members to have equal voting rights and meeting at least twice a year. FLO further stipulates that there must be a flow of information between the Board and members. In terms of financial accountability, an elected financial

committee of non-board members is in charge of the books or commissions an external audit at least once a year. The Work plan for both collective organisations and plantations is also another vehicle for accountability as it must be approved by management and workers (and by FLO), as does the budget for the premium work plan as well. Similarly, the Collective Bargaining agreement requirements can be a very active tool for addressing accountability in labour conditions.

BBP's internal and external accountability is addressed through the detailed down and documented planning activities requiring that all procedures be written including the objectives, the person responsible, schedules etc. On the internal front, workers must be consulted about and informed of technical and organizational changes that the company plans to make and any possible social, environmental and economic impacts.

At the level of certification agencies, IFOAM's accreditation criteria cover issues of accountability, responsibility, access to information and participation.

One issue where most of the initiatives specifically address the issue of accountability internally is occupational health and safety. In all cases clear channels of responsibility should be in place for the implementation of a health and safety plan/system. The BBP has indicators for evidence of occupational health committees and for the dissemination of the social policy. FLO criteria require a responsible person to be elected amongst the workers. In the case of SAI and the ETI, both of their standards require the appointment of a senior management representative in charge of health and safety.

Moving beyond the level of internal accountability to external accountability, all initiatives cover this through different vehicles. For example, in the BBP this is accomplished through standards on community relations and the need for communication and consultation with community groups. For IFOAM, Basic Standards on Labelling seek to create clear rules as to what can be labelled as organic in order to avoid consumer confusion and to increase trust. In the case of the ETI, the vehicle for external accountability of members (as opposed to the suppliers who are to be externally verified as the end goal) is annual reports submitted to the ETI to track performance. For SAI SA 8000, requirements for outside communication include the establishment of procedures to regularly communicate to all interested parties information regarding performance of the company regarding compliance with the standard. There are also provisions to supply reasonable information to other parties in the supply chain where required by contract. While FLO has perhaps the strongest internal accountability requirements, its external accountability is mainly focused on its own external verification as a vehicle for external communication through the use of fair trade labels.

Ongoing Developments

Since the first presentation of this comparative study at the Expert Meeting held at FAO in March 2000 all initiatives have continued to refine and improve their criteria, processes and procedures.

In particular, BBP has rewritten its Banana Standards, increasing both environmental and social requirements. Most of the progress has been made in moving towards greater levels of detail in the environmental indicators and in the introduction of social policies on the plantation. Also FLO has reviewed its banana-specific criteria. As written above, FLO has now completed a general restructuring process that will become operative starting in 2002.

Furthermore, IFOAM is gradually developing a social agenda through a participatory approach and trying to expand on the social criteria in its standards. They are also evaluating the possibility of developing a Code of Conduct addressing social issues for all organic traders. Such issues will be discussed at the General Assembly in Canada in August 2002.

ETI is carrying out a pilot project in Costa Rica to define best practices in monitoring and independent verification of the provisions contained in its Base Code. The project will test two different methods, each of which will inspect against the Base Code and require different degrees of ownership and participation of stakeholders: a multi-stakeholder group approach and a social audit by an auditing company.

There has been increased momentum for collaboration between programmes working in banana certification since the March 2000 expert meeting. A Working Group on responsible banana production and trade has been formed to facilitate dialogue and co-operation on specific topics. The Group has produced a brochure describing the various banana certification schemes targeted for a retailer audience. Also, it has been designing a joint project to improve the efficiency of certification and train inspectors and farmers on pilot farms. The project was discussed in September 2001 in London. The Group has also established an electronic discussion forum and intends to prepare a manual on responsible banana farming for growers. The ongoing developments will be assessed at the second Expert Meeting in San José, Costa Rica December 2001.

In February 2001, a workshop on smallholder group certification was organised under the auspices of IFOAM and FLO with the aim to seek uniformity in and mutual recognition of organic smallholder group certification by certification bodies. The workshop was organised by AgroEco and Novotrade in the Netherlands and Twin Trading in the United Kingdom.

FLO, IFOAM, SAI and CAN, together with other organisations, have formed the International Social and Environmental Accreditation and Labelling Alliance (ISEAL) whose main goal is to obtain credibility and recognition for the participating organisations, to promote continuing professional improvement of certification and accreditation activities and to defend common interests. In this context they also have investigated areas for further collaboration.

These same four organisations have also set up a joint research project under the name of Social Accountability in Sustainable Agriculture. The objective is to develop

guidelines and tools for the implementation of social audits in sustainable agriculture applicable for a wide range of agricultural production systems and product chains. Furthermore, they intend to foster the co-operation between the initiatives through shared learning.

Conclusions

A. Similarities and Differences

One of the fundamental similarities in the **basic principles, values and philosophies** of all the initiatives is the perception of a need for change in current economic practices. Even though this is achieved from different points of view, i.e. environmental, commercial, and social, this is a commonality that links all initiatives. Both social and ecological principles are included in FLO and BBP standards. FLO tends to put more emphasis on the social aspects, while instead BBP focuses more on the ecological aspects. On the other hand, both SA8000 and ETI concentrate solely on the social aspects of production and on working conditions. IFOAM aims to promote organic agriculture and its objectives are primarily environmental.

In the area of **monitoring and control**, all initiatives but ETI are based on the principle of third party verification. It should be underlined that ETI is established as a learning initiative to explore how to monitor compliance with a code of conduct in companies. Who carries out the inspection varies widely through the five initiatives. IFOAM and SAI are accreditation agencies using accredited certifiers to carry out the certification process. For FLO and BBP, staff members or consultants ('monitors') carry out the inspections and special internal committees make final decisions. The basic certification steps are fundamentally the same in all systems. In terms of arbitration, while this is explicitly mentioned in the two accreditation agencies (IFOAM and SAI), it is less explicit in FLO, BBP and not yet formulated in the ETI. With regard to the inspections, again, the basic steps are quite similar including obtaining background information, on-site visit of production facilities and offices, with a review of records as well as interviews with stakeholders.

Moving into **environmental criteria**, apart from SAI and the ETI not covering these issues, there is a clear focus on environmental conservation and protection. A wide range of issues is covered ranging from soil to water conservation, waste management and agrochemical use. While FLO and the BBP both allow strict and controlled use of authorised chemicals, IFOAM's organic agriculture prohibits the use of synthetic chemicals. The BBP criteria and indicators are stronger in terms of operational procedures and, together with FLO's, clearly focus on the progressive substitution of chemicals with more integrated organic management techniques.

Regarding **social criteria**, a fundamental similarity is that all of the systems base their standards on basic ILO conventions. One main difference is that IFOAM standards for social justice are vague whereas the other initiatives have detailed criteria and specific procedures for social issues. The fundamental worker's rights are to be guaranteed including freedom of association and right to collective bargaining, non-discrimination and prohibition of child labour. Furthermore, social policy issues are also included comprising a fair and sufficient wage, healthy and safe working conditions, social security and basic needs.

Generally speaking we can affirm that each standard has its own specificity, objectives and type of beneficiaries: IFOAM in organic standard setting and

accreditation of certification systems through the International Organic Accreditation Service, FLO in issues related to smallholder and disadvantaged producers, BBP with a focus on large plantations, SAI in certifying management systems in a corporate environment and ETI as a learning initiative investigating social issues involved throughout the supply chain.

B. Scope for further Collaboration

1. From the above discussion, it becomes apparent that SAI's SA 8000 and ETI's social standards are similar with regard to most issues. The order differs but the wording is, in most cases, similar.
2. Given that all initiatives cover health and safety issues, the intersection between these and environmental considerations including the use, handling and storage of agrochemicals is an area where co-operation could be fruitful.
3. IFOAM and FLO share relatively similar holistic approaches in their standards and criteria, even though they are founded on different bases: many of FLO's criteria can be met over a defined time scale, while IFOAM's are a prerequisite for certification. Moreover, organic standards are essentially global standards while FLO's standards are specifically designed for developing countries. Market developments have increased demand for products that are both certified as fair trade and organic. This may require some harmonisation of inspection procedures to make dual certification easier and facilitate possible convergence in labelling. More attention might also be placed on training activities and generally information sharing between these two systems. The workshops carried out by AgroEco are a first step in this direction. An area where further collaboration could be sought are waste management criteria, an area where IFOAM standards are currently minimal.
4. FLO's approach whereby "minimum requirements", to be met for certification, are balanced by clearly defined "process requirements", to be met over time, could be adopted by other certification programmes. This approach sets clearly the requirements needed for certification and it strengthens the credibility of the continuous improvement enforcement, whose goals and aims are clearly stated. The BBP could use this approach to introduce their revised standard, especially the stricter social criteria, over time. (The BBP already has a requirement for continued improvement that could facilitate this approach).
5. The issue of consumer perception is fundamental to all initiatives. For the average consumer there is little or no confusion over the definition of organic or fair trade. Their related labels and product claims are clearly perceived and recognized. This is also strengthened by the fact that they both, in order to guarantee the products' organic integrity or its fair trading, actually certify the entire supply chain leading to the consumer. Problems could occur for those products whose characteristics are not clearly differentiated and distinctive in the mind of the consumer, such as BBP, or whose certification is not aimed at the consumer, as in the case of the facility based or retail level certification of ETI and SAI. Extra efforts to explain the standards and labels to the consumers may be necessary, especially in a period where corporate codes of conduct, environmental or social labels are proliferating and increasing consumers' confusion.

6. Continuing on consumer perception, it is worth expanding on the chain of custody issue. SAI and BBP both certify specific facilities or farms, but while SAI does not issue consumer level labels, BBP does. SAI has amongst its objectives the extension of certification to suppliers and other supply chain actors, BBP does not. BBP carries out chain of custody audits of the companies manipulating the seal making sure that promotional materials have their approval and are used correctly. Greater involvement of supply chain actors in the BBP programme might be required to ensure the BBP product is perceived as being distinctive by consumers.
7. Furthermore, one area where all initiatives have much in common is the actual inspection and certification process (except for the ETI). In all cases, the same basic steps are followed even though the organisation and the inspection team carrying out the inspection can vary. The actual inspection process offers perhaps the most immediate possibility for further co-operation. The various initiatives have begun to learn from each other's experiences on the issues of monitoring and inspection. The efforts of ISEAL, the results of the ETI and Social Accountability in Sustainable Agriculture pilot projects could prove decisive.
8. One area where discussions between all initiatives could be particularly fruitful is the delicate area of monitoring social standards. Given that social and labour rights monitoring is less tangible than the monitoring of environmental criteria, the sharing of experiences on how to develop appropriate indicators and measurement tools for social auditing procedures could be a useful point for discussion. This is being pursued through the joint Social Accountability in Sustainable Agriculture project mentioned above and all initiatives could benefit from the results from the ETI pilots.
9. Beyond the points of convergence mentioned above, all of the initiatives have many overall characteristics in common. These characteristics include the desire for improvement in the lives of workers and producers, and the choice of vehicle for action through a set of standards and criteria to be complied with and verified by independent third parties. They all point to the need for closer collaboration so that the beneficial impacts of the initiatives are not lost in cumbersome administrative processes and inertia.

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