

Rough Start of National Standards

Vineyard View

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On October 29 – 30 Scientific Certification Systems, Inc. (SCS) convened a meeting of interested stakeholders to begin the process of creating a national set of farming standards for sustainable agriculture. These standards would apply to all crops. Several members of the California wine industry were present. At the moment it is difficult to assess the importance of this process because the initial stages have been handled so poorly by SCS that many groups question its chances of coming to fruition. However, I feel it is potentially too important for the US wine industry to ignore. I will discuss several issues that come to mind as a result of the process that SCS has begun, including the need for national sustainable agriculture standards, reasons for complying with standards, various types of standards, and the poor way SCS have gone about initiating the process.

Why have a set of national sustainable agriculture standards? SCS has observed an ever increasing number of sustainable farming claims being made in the marketplace opening the possibility for confusion among consumers and food distributors. It is thought that a set of national standards would alleviate some of this confusion as well as add credibility to existing sustainable farming claims. Moreover, the number of third party-certified sustainable farming programs is increasing, as well as many in-house self-certification programs. It is thought that a national set of standards would harmonize these programs, further reducing the chance of confusion among consumers and food distributors. Finally, a national set of sustainable farming standards that meets international standards, such as EurepGap, may help American farmers gain better access to foreign markets, such as the European Union.

Why go to the effort of complying with a set of sustainable agriculture standards? I can think of several reasons. One is to differentiate your products from others in the marketplace, which is why Lodi growers developed the *Lodi Rules for Sustainable Winegrowing* program (www.lodirules.com). Another is to demonstrate to consumers (and yourself) that you are ‘doing the right thing’. A third is to get regulatory relief if the standards you are using comply with government regulations (e.g. Fish Friendly Farming, www.fishfriendlyfarming.org). And finally, you may sell to a processor who thinks it is a good idea. It is important to decide why you want to work with sustainable farming standards because your reasons will likely dictate the type of standards you should use.

There is more than one type of sustainable farming standards and it is important to know how they differ as more and more of them appear. I know of three basic types; process-based, practice-based and performance-based. A process-based standard is one like ISO 14001 (http://www.iso.org/iso/iso_14000_essentials). The grower implements a cycle of self improvement using the following steps. First one sets goals for the farm focused on sustainable issues. They then do a self-assessment of their operation using a tool such as the *Lodi Winegrower’s Workbook* (www.lodiworkbook.com), the *Positive Point System* (www.vineyardteam.org/pps/), or the *Code of Sustainable Winegrowing Practices*

Workbook (www.sustainablewinegrowing.org). A plan is then created to improve on the environmental problems identified by the self-assessment. After a period of time, say a year, one then reviews the plan noting the progress made. If it has been completed new goals are set and a new plan is made. If it has not been completed the plan is altered to ensure success. The cycle is then repeated.

Practice-based standards are ones that require a grower to implement specific practices. Sometimes the standards prohibit the use of certain practices. The National Organic Program and the *Lodi Rules* program are examples of practice-based standards.

Performance-based standards are ones that specify a certain level of performance a grower must comply with. For example, the standard stipulate that the grower is not allowed to exceed a specified level of fuel consumed or that they meet a specified percent reduction in fuel consumption below a preset benchmark. Similar standards can be set for other things like water use, electricity use, pesticide use and so forth. I am not aware of an example of a set farming standards based solely on performance but I think we may see a move in this direction in the future.

How do these three types of standards differ? A good way to illustrate the differences is to view sustainable farming as a continuum, with one end being not sustainable at all and opposite end being complete sustainability. As one moves along the continuum their level of sustainable farming increases. A process-based set of standards means that a grower is moving along the continuum increasing their level of sustainable farming over time. They can be at any point along the continuum and still be in compliance with the standards. This is because process-based standards do not stipulate any particular level of sustainability. For example, a grower could be near the not sustainable end of the continuum but as long as they were showing continual improvement over time they would be in compliance with the process-based program. On the other hand, the practice-based and performance-based standards stipulate a particular level of sustainability. A grower must be at or past a particular point along the sustainability continuum to be in compliance with the standards. Ideally a practice-based program should require a grower to be at a high level of sustainability or, in other words, near the complete sustainability end of the continuum.

Certification often goes hand in hand with sustainable farming standards. Why is certification necessary? To be blunt, it is because unfortunately many consumers, environmental groups, and government regulators do not trust the farmer to do the right thing. However, surveys have shown consumers are willing to trust certification programs, particularly if there is a third party involved. A third party means that the group certifying the practices is independent of the growers being certified, eliminating any chance of conflict of interest.

Certification is a scary word to many growers. It brings visions of mandatory programs that require them to do onerous and costly things that do not result in any added value to their crop. I can understand why they feel this way and I caution anyone exploring a certification program to be sure they understand why they want to do it. In my opinion,

the main reason to undertake a certification program is to meet a need for added credibility to a program. If improvement in practices is the goal this can be achieved without a certification program.

If a national sustainable agriculture standard is developed it is important that the process be stakeholder-driven. However, in my opinion, SCS has done a poor job so far. SCS is a for profit certification company that has been in existence for over 20 years (www.scs-certified.com). They have extensive experience in many aspects of certification. In early 2006 SCS contacted a few people in the California wine industry to come to their office in Emeryville to discuss the development of national sustainable agriculture standards. Those invited were people involved in the California Sustainable Winegrowing Alliance and local winegrower groups who had sustainable winegrowing programs. About 8 attended the meeting along with about 6 SCS staff. At the meeting SCS informed the attendees they were working on a set of national sustainable agriculture standards and since they felt the wine industry was farther ahead than other Ag groups in developing sustainable farming programs, SCS wanted their input into the development of these standards. We were shown some draft standards and asked if we would not only review what SCS had drafted but also pilot test them with some of the growers in our respective programs. They told us they had a very aggressive timeline and were hoping to make significant progress by September of 2006. As we left the meeting we were given every indication we would hear from them soon.

As it turned out we did not hear from SCS again until receiving an email in early August of 2007 inviting us to a stakeholder meeting on Oct. 29-30, to start the process of developing sustainable agriculture standards. The email described our April 2006 meeting as an advanced briefing of the process to develop a national standard. Furthermore, the email stated that a complete draft standard had been developed and had been filed with the American National Standards Institute (ANSI; www.ansi.org). And finally, the email informed us that “a 3-year clock has begun ticking to take this standard to final form.”

At the October meeting questions to SCS from attendees brought out several more interesting facts. For example, SCS was already using the ‘draft’ standard to certify some of their clients who produce cut flowers. When asked why this was happening they said it was necessary to pilot test the standards to see how they functioned. Another question revealed that SCS was paying for the process to develop the national standards through their funding of the Leonardo Academy, an ANSI accredited organization hired by SCS to facilitate the standard development process. When questioned why the standards had been drafted before the stakeholder meeting SCS stated that having draft standards would make process of finalizing them easier. Finally, despite repeated claims that they were casting a large net to engage stakeholders everyone I talked to at the meeting found out about the meeting at the last minute from a colleague rather than having received an invitation directly from SCS.

What I have described above is, in my opinion, a very flawed process so far. I do not consider an email meeting invitation that includes the words ‘the clock is ticking’ as an

indication of a genuine desire to get stakeholder input. Moreover, a certification agency that stands to make money from the development of national standards, has written the initial draft of the standards, is paying for the process of finalizing the standards, and is already using the draft to make money from clients, has a major conflict of interest. Nevertheless, SCS has started the process in motion and if it continues according to ANSI protocols, the standards will be endorsed by ANSI in three years. Therefore, I think the US wine industry should keep track of it and provide input if the opportunity arises. Visit <http://www.leonardoacademy.org/Projects/ansi.htm> to find out more about the project and how to get involved. A copy of the draft sustainable agriculture standards can be downloaded from: http://www.scscertified.com/programs/SCS-001_SusAgStdFP_041307-LEO.pdf.