
Crops and Sugar response to Red Tractor Version 5 Proposed Standards

Introduction

The NFU Combinable Crops team, and NFU Sugar welcome the opportunity to provide a complete technical response to the Red Tractor V5 Standards Review. Our response relates directly to our sector and is written on behalf of our membership of around 28,000 arable and mixed arable farmers, and nearly 3,000 sugar beet growers, led by the National Crops Board, and the Sugar Board. It has been written after extensive consultation with our members and growers, and any comments which relate only to the sugar beet sector are highlighted accordingly.

The V5 Combinable crops and Sugar Beet Standards have attracted considerable interest from our members and growers. In a series of virtual meetings, both regional and national, NFU members have discussed the proposals sometimes with RT representatives present. We are grateful for the time RT staff have spent meeting with NFU members and growers.

From the outset of the review process the importance of food safety and traceability has been at the heart of our approach, and it's something the sector works hard to ensure. However, just as important is making sure the standards farmers have to meet are focussed on exactly that outcome: food safety and traceability. In order to achieve this, and the support of the farming sector, standards need to be relevant, proportionate, avoid duplication, and clearly understood to avoid inconsistency in audits. For the NFU Crops and Sugar sector, they have to be commercially relevant and integral standards that assures food safety and traceability for supply chain customers, but they also have to be compatible with, and not undermined by, criteria applied to imported grains and oilseeds.

Whilst some changes were made during the TAC process, the Crops and Sugar Board representatives were united in believing that much more substantive revisions were required to what has become the draft V5 standards. We felt we had no choice but to call for a delay to the consultation to allow this work to be done, and we offered to work with RT on ways to make the standards more fit for purpose. The one-month delay which was granted, whilst welcome, did not allow for this.

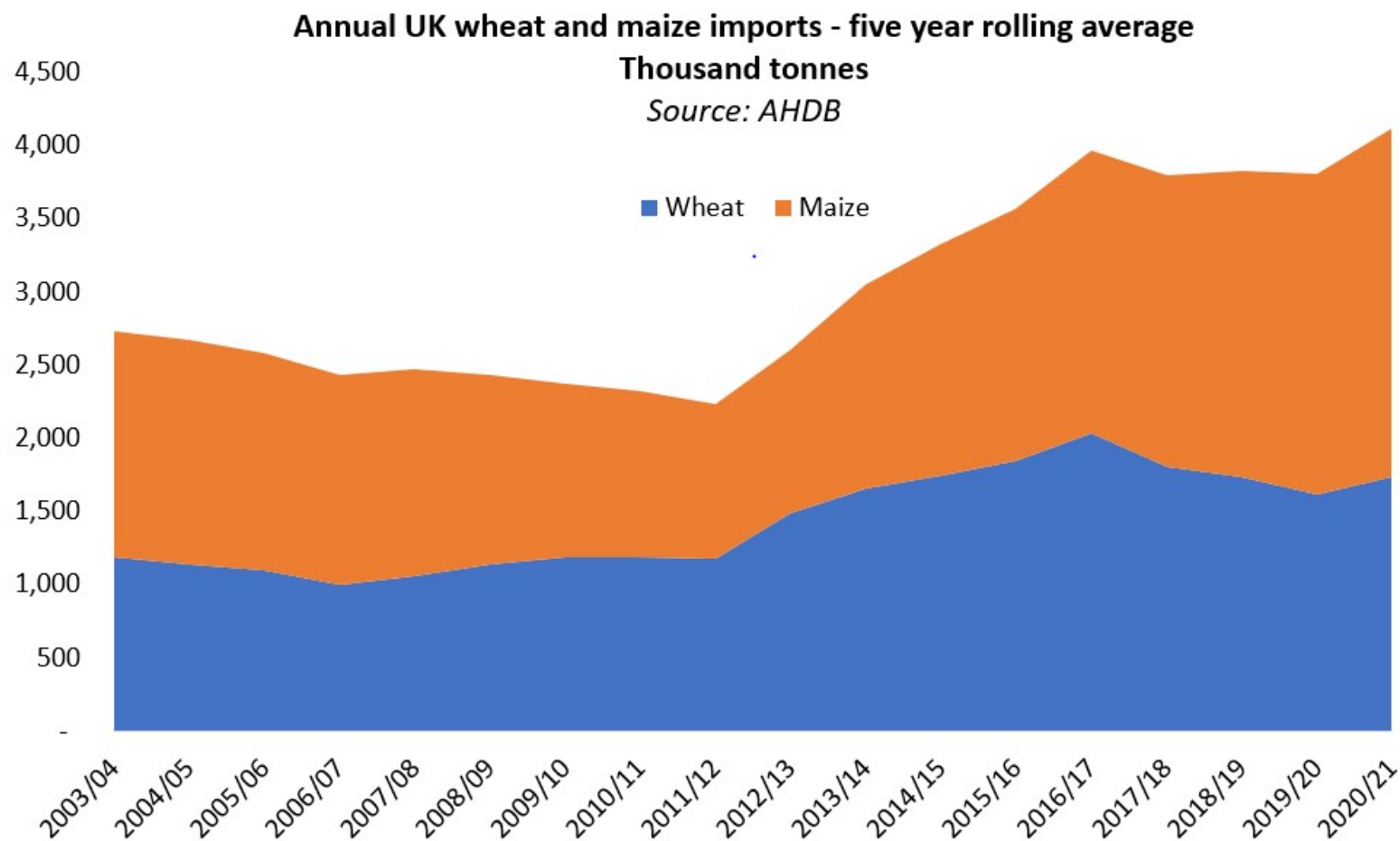
Since the launch of the review on 4th January, the NFU has undertaken a widespread series of consultation meetings with its members. This has included meetings of: the national board, all of the regional crops boards, RT focussed regional meetings, regional sugar forums, branch meetings, and national webinars. These meetings have been well attended by a diverse range of members. We hope the strength of feeling amongst NFU members and growers has been seen quite obviously in those consultations meetings, and it is clear to us that for the sector standards to retain member buy-in, substantial changes are required.

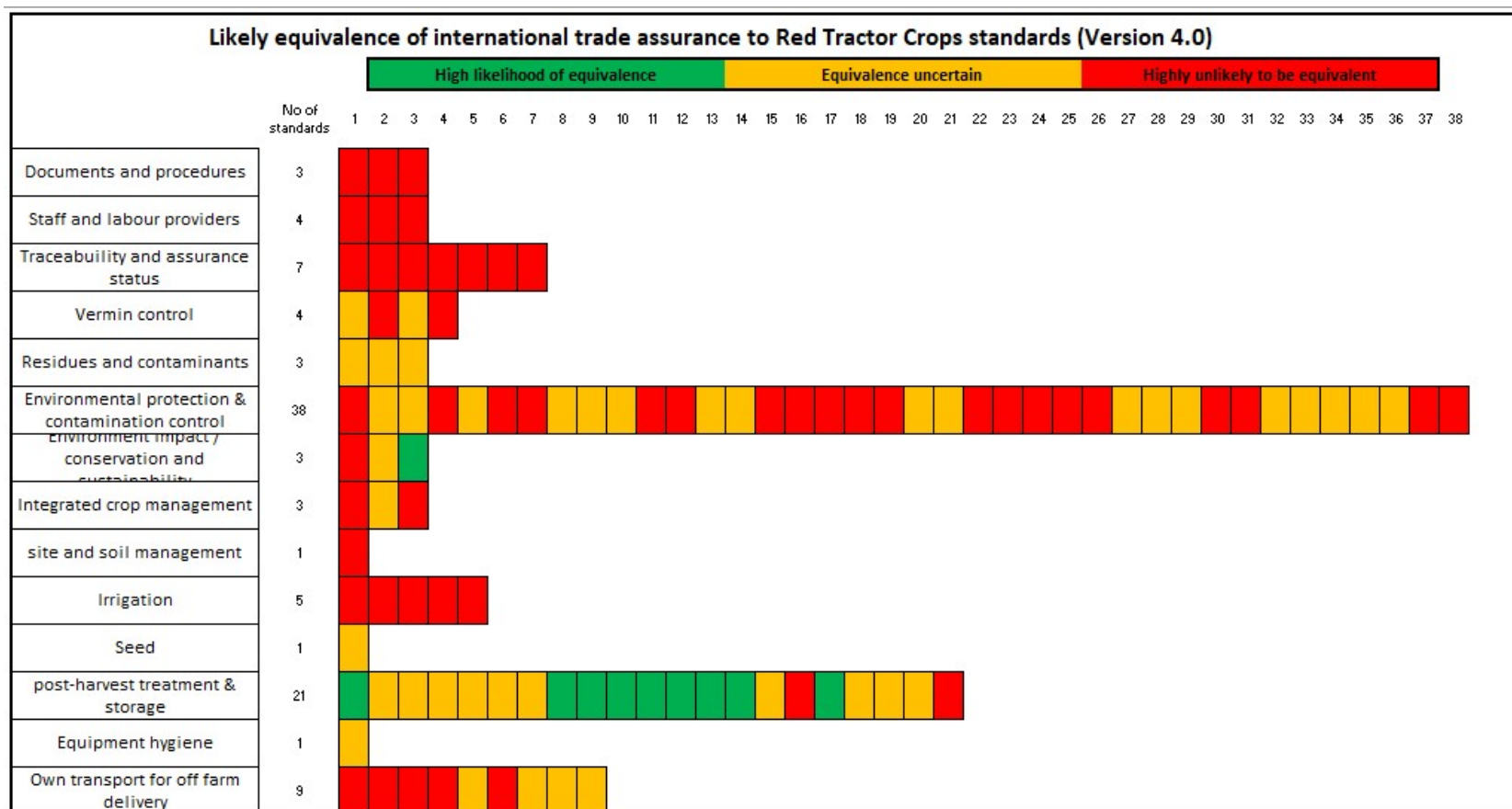
NFU Crops

Whilst below we provide a response to each of the standards individually within V5, it is worth highlighting that during NFU member meetings, a number of recurrent responses to V5 have been prominent, many of which will have been heard by RT representatives present in the meetings they attended:

1. Members are very concerned about the implications the draft V5 standards will have on their competitiveness given that the cash and management time costs associated with demonstrating compliance will be increasing with no evidence of any consequent additional value. Furthermore, we question the merit of end users being able to call for ever higher Red Tractor standards, whilst being free to purchase imported grain which is very likely to have been produced to a lower standard.

Over the last decade we have seen a structural shift in the UK grain market led by wheat moving from a large net export status to a much more finely balanced scenario. This changes the frontier of competition with the world market from the export market to the domestic market as imports have become more prevalent. The disparity between import and domestic standards becomes much more visible with more imported grain in the domestic market. Grain imports are important to the functioning of the UK grain market, but there must be equality in the requirements for both domestic and international origin grain. The two charts below highlight the issues at stake here, with both the changing market, and the differences between the standards farmers in England and Wales face as a result of Red Tractor farm assurance, and the lack of equivalence with trade assurance which will be widened by V5. To be clear, this is not a criticism of imports and trade, which are often very important to the UK supply chain especially in years like this one. However, we cannot be in a position where the lack of transparency allows ends users to demand ever higher standards of UK farmers, which increases the cost of production whilst buying imported grains which prevents value trickling down the UK supply chain for the high UK standards. It is a question of transparency and fairness and the concern V5 would just heighten the lack of equivalence.





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2. The duplication of legal minimums is unnecessary and has potential to cause confusion or accidental non-compliance with regulation. As a principle, we do not agree that just because something is law it should automatically become a Red Tractor Standard. That does not mean we object to the legal minimums, but rather we wish Red Tractor to focus on outcomes and key areas, rather than diluting and extending the list of standards unnecessarily.
 3. Relevance. The lack of relevance of some of the new standards to the arable sector has been perhaps the most strongly held concern, especially in relation to the 'Personnel' section, although **not** exclusively so. Whilst our members take the welfare of their employees very seriously, many of the standards do not reflect the reality of employment on most arable farms because they are drawn from the very different 'fresh produce' sector. If the standards are not seen to be relevant to the reality of the arable sector, it will promote a 'tick-box' attitude to them: standardization across different sectors at the expense of making the standards less relevant is counterproductive.
 4. In places, we have concerns around a lack of objectivity of assessment and lack of clarity in the audit points provided. The language used is not always appropriate, detailed, or professionally communicated to ensure delivery of the standard nor objectivity in audit by assessor. Ambiguous audit points only serve to create the potential for inconsistency of audit. A key outcome of a standard is being able to communicate properly how it will be measured.
 5. In addition to the above, we feel there is a clear need for standards to deliver meaningful outcomes and not create unnecessary and burdensome paperwork, which is a burden both in terms of cash and management time. We are concerned that many of the new and some existing standards create a requirement for records, paperwork and policies, rather than looking at outcomes or delivery of the principles.
 6. Proportionality to ensure that the standards are not adding unnecessary paperwork burdens on already pressurised farmers. Red Tractor should look to make processes simple and accessible. In some cases, templates and guidance, clearly communicated could help, but it would be preferable to have less burdensome and more relevant standards which avoid becoming a box ticking exercise. Some areas of standards are very new to the sector and will be new to many members. Red Tractor will need to provide support and guidance on some of these if they are to be meaningful. Arable farming is a highly diverse sector and should be considered as such with regards to proportionality. This is particularly in relation to those standards brought over from the very different fresh produce sector, where they may be proportionate, to the arable sector, where they are not.
 7. Consideration must be given to what value being delivered by the scheme, and is any provided by the inclusion of so many additional standards, as well as a cost benefit analysis communicated to the farmer. The potential for cost increase from certification bodies due to extended assessment time and assessor training must also be considered. There are significant potential risks of increased cost, particularly passed onto farmers with no perceivable value added, where this is the case, there is a role for de-prioritising unnecessary standards. We have heard talk of one in, one out in relation to standards, and many growers have expressed concern at the continual ratcheting-up of standards, rather than a focus on the relevance and value of them.

8. Many standards in the review require much more clarity in the descriptions and guidance to support farmers. We also feel that where something is a legal minimum or divergence has taken place, that this is clearly stated so that it reduces the risk of complying with one and not the other.
9. We are also concerned that with the SAI silver benchmark under review, as in the Sugar sector we have growers, for example of malting barley who are concerned there may have to be more changes to come.

Our final point is on the weighting given to grower and NFU feedback when the TAC and RT consider it. We very much hope the strength and weight of feeling those who will be most affected by V5- the growers- will be given the consideration it deserves.

NFU Sugar

As all sugar beet contracted with British Sugar must be Red Tractor assured as a requirement of sale, the V5 standards will apply to all sugar beet growers. These standards have caused significant debate amongst the grower base and there is continued strong engagement in the standards review.

In the context of the devastating sugar beet campaign in 2020/21 as a result of challenging weather conditions and the unprecedented impact of virus yellows disease, growers have told NFU Sugar that the launch of the Red Tractor consultation in January 2021 caused additional and unnecessary uncertainty during an already hugely challenging time.

Since the launch of the consultation, NFU Sugar is grateful to Red Tractor representatives for attending the January NFU Sugar board and various grower meetings, including regional sugar meetings. In addition to growers engaging with Red Tractor representatives directly, growers have also approached NFU Sugar to express their views on the proposed standards.

There is a strong feeling amongst growers that Red Tractor standards must be clear, fit for purpose, with each standard needing a clear business case to support its rationale. Common concerns raised by sugar beet growers include:

1. Suitability of the standards for the sugar beet sector. Many growers are surprised and frustrated at the length and contents of the standards, especially those directly carried over from the fresh produce sector such as, but not exclusively, some of the personnel standards. Recognising that worker welfare is of course important, there appears to be no clear business case to support our sector having to follow some of these unsuitable and disproportionate standards which will create additional and unnecessary paperwork.

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2. Value. Growers have consistently asked why they will be required to follow the V5 standards with no benefit or cost-benefit analysis applied, feeling that they are being required to follow ever increasing standards for no additional benefit. It must also be highlighted that growers see a distinct risk of increased audit costs to cover the lengthy audits, a burden that it is not appropriate for growers to bear with no additional value or benefit gained.
 3. Equivalence. There is frustration that much imported sugar is not produced to the same standards that UK growers must follow, therefore concern that the proposed V5 standards place UK sugar beet growers at an unfair disadvantage with no additional recognition, just additional paperwork and cost.
 4. Rationale. Growers recognise that Red Tractor is currently benchmarked against the SAI Silver standard, allowing the processor, British Sugar, to sell to its customers without growers having to complete additional audits. Growers support avoiding duplication of audits, however with the awareness that the SAI FSA is currently under review, it is impossible for growers to know what this may include and the consequences of any changes. There must be openness from Red Tractor regarding why standards are included, and indeed if certain standards are included in order to benchmark against SAI then this should be stated clearly.
 5. Double standards. There is disappointment that growers will have to follow strict standards on areas such as irrigation water testing, meanwhile the processor, British Sugar, is able to bypass these requirements at a later date when the crop is processed. Growers see these practices as illogical and unfair.
 6. Transparency. There is a loud call from growers about the importance of openness in the process post consultation closing date, with concern whether their voices will be listened to by Red Tractor when the standards are finalised, given that farmer and grower representatives are in the minority on Red Tractor boards.

Key

The below, colour coded key, will be used in the “NFU commentary” column, to denote the NFU Crops and NFU Sugar position on each proposed standard or standard revision, and be accompanied by comments.

Accept
Reject
Reject but may accept with suggested adjustments

Combinable Crops and Sugar Beet Standards Version 5 – draft for consultation

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RISK ASSESSMENT			
Standard	HYWBM	NFU Commentary - Technical	NFU Commentary - General
Aim: to produce safe and legal product			
RA.1 Key A documented Crop Contamination Risk Assessment must be completed (Revised)	<p>RA.1.a</p> <p>The Risk Assessment takes into account all possible sources of contamination at each process stage, including during short and long-term storage</p> <p>RA.1.b</p> <p>The following areas of possible contamination are considered:</p> <ul style="list-style-type: none"> physical (e.g. glass, metal, clay pigeon fragments, lead shot, bitumen, stone, plastic, other crops; peas/ beans) chemical (e.g. pesticides, fuel oil, mycotoxins – DON, ZON, OTA, ergot, T2/HT2), which includes: <ul style="list-style-type: none"> a CIPC Store Risk Assessment for each store or for wheat: a completed AHDB mycotoxin risk assessment for the current growing season, for each field, or agronomically similar blocks of fields all crops: possible mycotoxin risks biological <p>allergens (e.g. soy, mustard, celery)</p>		<p>‘All crops: Possible mycotoxin risk’ is very broad, more detail on what is required to be considered and how this is documented to ensure compliance. Easier for some crops.</p>

	<p>RA.1.c Control measures and prevention are detailed for all the potential contaminants identified</p> <p>RA.1.d The following is included in the control measures:</p> <ul style="list-style-type: none"> clay pigeons are not shot over standing crops of rape after the yellow bud stage there is no shooting over stored grain 		
<p>Further guidance on mycotoxins can be found here:</p> <ul style="list-style-type: none"> - AHDB risk assessment for fusarium mycotoxins in wheat: https://ahdb.org.uk/mycotoxins - AHDB guidance on fusarium and microdochium in cereals: https://ahdb.org.uk/knowledge-library/fusarium-and-microdochium-in-cereals - AHDB guidance on ergot in cereals: https://ahdb.org.uk/ergot - FSA business guidance on mycotoxins: https://www.food.gov.uk/business-guidance/mycotoxins 			

DOCUMENTS AND PROCEDURES			
Standard	HYWBM	NFU Commentary - Technical	NFU Commentary - General
AIM: plans and procedures are in place to manage incidents or emergencies on farm			
DP.1 Key The farm, as a whole, must present an acceptable and tidy appearance to the general public. The site management must not present a food safety, animal welfare or environmental risk	DP.1.a The external areas around buildings and farm entrances are kept clear of rubbish, non-essential equipment and other debris		
	DP.1.b Loose wire, scrap machinery, scrap metal, seed and fertiliser bags, PPP containers and disused tyres are managed		

<p>DP.2 A documented plan for the effective management of serious incidents and potential emergency situations that threaten food/ feed safety or the environment must be in place and known to those involved in farm tasks <i>(Revised)</i></p>	<p>DP.2.a You have considered the risks to your farm and documented the actions to be taken in the event of (where appropriate): o fire o power cuts o extreme weather o pollution incidents (e.g. agrochemical spill) o other site-specific risks</p>		
	<p>DP.2.b Up-to-date relevant contact details are displayed (including out of hours phone numbers) e.g. electricity supplier, Environment Agency hotline</p>		
	<p>DP.2.c Key personnel have access to plan</p>		

DP.3 Systems must be in place for recording, investigating and resolution of any complaints that are relevant to the requirements of the Red Tractor Standards	DP.3.a System includes recording the: o complaint o investigation result o action taken to prevent the issue happening again	
<i>Complaints made by Local Authority, general public, customers (e.g. delivery point rejections) or other</i>		

PERSONNEL			
Standard	HWYBM	NFU Commentary - Technical	NFU Commentary - General
AIM: All personnel (including but not limited to employees, self-employed and family members) are trained and competent to carry out the required activities on farm/sites relating to primary production on site			
PL.1 Systems must be in place to ensure all new personnel are effectively trained and deemed competent to carry out	PL.1.a <div> Counter signed induction record to include: <ul style="list-style-type: none"> - activities role will undertake - H&S information - reporting lines </div>		

the activities they are employed to do (Revised)			
PL.1.1 Nobody starts work without an induction, supervision and explanation of the tasks they will carry out			
PL.2 The performance and competence of employees must be reviewed on an annual basis and employees are deemed competent to carry out the activities they are employed to do (New) <i>Reviews may be conducted by individual or by job role</i>	PL.2.a Documented performance reviews of work undertaken and ability to carry out required roles (see Appendix) PL.2.b Recorded gaps in competence are addressed by training or timelines stated for completion	Crops: The scope of this should be limited to production linked activities.	<u>CROPS reject:</u> This is excessive relative to the risk. The TAC have been provided with no evidence that this is a material source of risk. This is not outcome based, will likely result in more on farm bureaucracy and risks distracting management time away from more important standards. No cost benefit analysis has been provided. <u>SUGAR: reject</u> Not applicable to our sector. It should be up to individual business how they performance manage employees.

PL.3 Records of training must be kept	<p>PL.3.a</p> <p>A training record is available for all, including:</p> <ul style="list-style-type: none">○ name○ details of training/ events attended○ date of training○ who provided the training (in-house or external provider) <p>PL.3.b</p> <p>Records kept for two years after person has left the business</p>	<p>Scope should be limited to training for production linked activity</p>	

<p>PL.3.1 Where contractors are employed to undertake work on the production of crops, a Contractors' Commitment Document is in place which confirms that the contractor will comply with the Red Tractor Combinable Crops and Sugar Beet Scheme requirements (New)</p>	<p>PL.3.1.a Contractor's Commitment Document is signed by both contractor and grower</p>	<p>Crops: This shows a lack of understanding of the reality on farm. Some contractor relationships will go back generations, but others might be based on an 'emergency' for example drafting in extra help to combine or bale ahead of bad weather or due to a breakdown.</p>	<p><u>CROPS</u> reject: This is not outcome based, will likely result in more on farm bureaucracy and risks distracting management time away from more important standards.</p> <p><u>SUGAR</u> reject: Some growers have had the same contractor lift their sugar beet for many years. This could do more damage than good and will result in excessive paperwork and time above what is required.</p>

		Standards must reflect and be relevant to reality to ensure buy-in.	
AIM: Any labour providers used are managed with agreements in place to ensure that workers provided are competent, and labour providers are licensed			
PL.4 Where labour providers are used, they are licensed and a documented agreement is in place <i>(Revised)</i>	PL.4.a All labour providers used hold a valid Gangmasters & Labour Abuse Authority (GLAA) licence		
	PL.4.b A documented agreement is in place between the business and the labour provider		

	PL.4.c The agreement confirms that any workers provided are suitably competent		
	PL.4.d		
	The agreement confirms any training completed by the labour provider as an alternative to the businesses' own training systems		
	PL.4.e The agreement confirms that all workers are legally permitted to work within the UK		
* see www.gla.gov.uk for more information			
AIM: Businesses are aware of ethical trade risks, including Modern Slavery and have taken appropriate steps to protect workers			
PL.5 A Red Tractor Ethical	PL.5.a Red Tractor Ethical Trade Self-Assessment Questionnaire completed within the last 2 years		<u>CROPS reject:</u> This is excessive relative to the risk. No evidence has been

<p>Trade Self-Assessment Questionnaire (or Sedex self-assessment) has been completed (New)</p> <p><i>Applies to any farm with employees (see: https://www.gov.uk/employment-status-for-definition)</i></p>	<p>PL.5.b Section B (Action Plan) of the Ethical Trade Self-Assessment Questionnaire has been completed (* <i>actions may be in progress</i>)</p>		<p>provided that this is a material source of risk.</p> <p>This is not outcome based, will likely result in more on farm bureaucracy and risks distracting management time away from more important standards.</p> <p>No cost benefit analysis has been provided.</p> <p><u>SUGAR reject:</u> Are customers really asking for this? What provisions will Red Tractor provide to support farmers such as templates and guidance?</p>
<p>The Red Tractor Worker Welfare Questionnaire has been produced with reference to the ETI Base Code: https://www.ethicaltrade.org/eti-base-code</p>			

<p>PL.6 Any temporary, on site accommodation provided must be</p>	<p>PL.6.a Accommodation, as provided is sanitary and fit for purpose (e.g. sound roof, windows and doors)</p>		<p>Crops: Well intentioned, but: There is a real risk that this becomes a tick box. Exercise. Legal minimums cover most of these. Not relevant to the majority of arable farm businesses.</p> <p>We also question whether temporary accommodation for those working in grain stores face a similar standard under TASCC?</p>
<p>habitable and have suitable basic services (New)</p> <p><i>Applies where accommodation is offered for a time limited period, typically to temporary or seasonal workers. It does not apply to accommodation provided as a primary residence – e.g. tied cottages or Assured Agricultural Occupancies</i></p>	<p>PL.6.b A clean and functioning refrigerator is available for food storage</p> <p>PL.6.c Potable water is available for drinking and hot water for washing</p> <p>PL.6.d Sanitary washing and toilet facilities are available</p> <p>PL.6.e Heating facilities are present if accommodation is used between 1st October and 31st March</p> <p>PL.6.f</p>		

	<p>Fire safety precautions are in place (e.g. smoke alarm, fire extinguisher)</p> <p>PL.6.g Electrical installations are inspected annually (or every 3 years if underground) by a qualified electrician</p> <p>PL.6.h Gas installations must be maintained at least annually by a qualified gas engineer</p>		
<p>PL.7 Businesses have taken steps to enable workers to raise concerns or grievances (New)</p> <p><i>PL.7.a applies to any farm with employees (see</i></p>	<p>PL.7.a A grievance procedure is defined and communicated to employees</p> <p>PL.7.b The business has taken observable steps to inform workers of how to report Modern Slavery</p>	Crops: Very hard to audit	<p>CROPS reject</p> <p>This is excessive relative to the risk. No evidence that this is a material source of risk. It would also be hard to apply in practice given the nature and family structure of many arable farms.</p> <p>This is not outcome based, will likely result in more on farm bureaucracy and risks distracting management time away from more important standards.</p> <p>SUGAR reject As above.</p>

<p>https://www.gov.uk/employment-status-for-definition)</p> <p>PL.7.b applies to any farm with 5 or more employees</p>			
<p>Businesses have their own grievance procedure or can demonstrate a documented commitment to following the ACAS Code of Practice for Disciplinary and Grievance Procedures: www.acas.org.uk/acas-code-of-practice-for-disciplinary-and-grievance-procedures/html</p> <p>Report it to the Gangmasters and Labour Abuse Authority on 0800 432 0804 or Modern Slavery Helpline on 0800 0121 700 or at https://www.modernslaveryhelpline.org/report</p> <p>Further resources to help farms identify Modern Slavery risks, including training tools are available through Stronger Together: https://www.stronger2gether.org</p>			
<p>AIM: A safe working environment for workers and visitors</p>			
<p>PL. 8 Health and Safety Policy in place and effectively</p>	<p>PL.8.a Health & Safety Policy in place</p>		<p>CROPS accept: Vast majority of comments thought H & S laudable and important. Some concern that</p>
	<p>PL.8.b Policy is effectively communicated to all relevant workers</p>		

<p>communicated to workers (New)</p> <p><i>Applies to any farm with workers (see: https://www.gov.uk/employment-status-for-definition)</i></p>	<p>PL.8.c</p> <p>Language and learning style is given due consideration to ensure all workers understand information</p>	<p>this had a 'box-ticking' feel though.</p> <p>SUGAR accept:</p> <p>Health and safety is very important to the sector.</p>
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Guidance on legal requirements for management of Health & Safety is available through the HSE website: https://www.hse.gov.uk/simple-healthsafety/index.htm			
PL.9 A named person has responsibility for Health and Safety (New) <i>Applies to any farm with workers (see: https://www.gov.uk/employment-status-for-definition)</i>	PL.9.a The Health and Safety policy identifies a director or senior manager as responsible for Health & Safety	Crops: H & S very important but this is too much like box-ticking	CROPS reject: because in its present form it lacks relevance to reality. 'director' and 'senior manager' is not really appropriate language for many arable businesses – as a minimum: suggest 'owner', 'manager', 'named employee'. SUGAR reject: Not applicable for many sugar beet growers due to business structure. PL.8 is sufficient, so this standard is not required.
	PL.9.b The person identified has sufficient visibility of business activities to fulfil this role		
	PL.9.c Identity of the responsible person is communicated to workers		

<p>PL.10 Documented Health and Safety Risk Assessment in place (New)</p> <p><i>Applies to any farm with five or more employees (see: https://www.gov.uk/employment-status-for-definition)</i></p>			<p><u>CROPS</u> Irrelevant or duplication for most arable businesses so not really adding anything. More guidance on what was to be covered by this would be required.</p> <p><u>SUGAR</u> Unclear and therefore cannot be accepted in this form. A template and clear guidance should be provided for any documentation required.</p>
<p>PL.11 Documented Health and Safety meetings take place (New)</p>	<p>PL.11.a Health & Safety meetings are held at least once per year</p> <p>PL.11.b Employees are represented at the meetings</p>	<p>Crops: Disproportion and difficult or impossible to audit consistently</p>	<p><u>CROPS</u> Shouldn't really need a record, easily coverable with a simple question from the inspector when talking to the farmer. Not very relevant to the structure of many farm businesses.</p> <p><u>SUGAR</u></p>

			This seems forced and is not required. Covered by PL.8 which is already required to be 'communicated' to workers.
<i>Applies to any farm with five or more employees (see: https://www.gov.uk/employment-status-for-definition)</i>	PL.11.c Employee representatives are able to communicate views and concerns	Crops: Guidance would be needed if this is to be audited consistently.	
	PL.11.d Records are kept of Health and Safety meetings		
PL.12 Appropriate first-aid requirements are defined and implemented (New)	PL.12.a First-aid requirements that are 'adequate and appropriate in the circumstances' are defined and documented		
	PL.12.b The first-aid requirements identify persons responsible for firstaid arrangements		
	PL.12.c Suitably stocked first-aid kits are available		
	PL.12.d The first-aid requirements identify an appropriate number of trained first-aiders (as a minimum, one person is trained)		

<p><i>It is recommended that the St John Ambulance First Aid Calculator is used to assess training requirements:</i> https://www.sja.org.uk/courseinformation/guidance-and-help/working-out-what-you-need</p> <p><i>Guidance on legal responsibilities and selecting a suitable training provider is available through the HSE website: https://www.hse.gov.uk/simple-healthsafety/firstaid/index.htm</i></p>			
<p>PL.13 There is consideration of increased risk for high risk workers (New)</p>	<p>PL.13.a Any increased risk encountered by high-risk workers is considered and documented</p>	<p>Needs much more specific definition of a high-risk worker</p>	<p>CROPS reject: Not sufficiently detailed.</p> <p>SUGAR reject: As above.</p>
<p>Applies to any farm with workers (see: https://www.gov.uk/em-employment-status-for-definition)</p>	<p>PL.13.b Breastfeeding or pregnant women are restricted from entry to areas where PPPs have been applied for a minimum of 48 hours, unless a longer duration is stipulated on the label</p>		<p>Crops reject: What is the scientific basis for this? The stipulations on PPP labels must already be followed. Is just employees? Public? Should only be mandatory where label requires it, as in other standards below</p> <p>SUGAR reject</p>

			PPP approvals are subject to robust risk assessments. This is not practical or required. No evidence provided to demonstrate need.
<p><i>High-risk workers include those who may be at greater risk for a time-limited or indefinite period. Examples include (but are not limited to): pregnant women, young or inexperienced workers and workers with specific medical conditions which may introduce an elevated risk – e.g. hearing loss.</i></p> <p><i>Risk consideration will generally be contained within a Health & Safety Risk Assessment (see PL.10) but business may opt to document this elsewhere, particularly if they are exempt from the requirement for a documented Health & Safety Risk Assessment due to having less than five employees.</i></p>			
AIM: Specialist consideration is given where hazardous substances are used or workers are entering operational areas that present specific risks			
PL.14 COSHH assessments are completed (New)	Relevant COSHH assessments available for inspection		
Refer to Control of Substances Hazardous to Health Regulations (2002). Further information provided by the HSE: https://www.hse.gov.uk/coshh/			
PL.15 Substances hazardous to health are identified by warning signs (New)	PL.15.a Warning signs in place where substances hazardous to health are stored		

PL.16 A procedure regulates reentry intervals for PPPs applied to crops (New)	PL.16.a A procedure regulates re-entry intervals for PPPs applied to crops	Only where the product label stipulates this requirement. This could have far-reaching implications if it goes beyond the requirements of a product label.	Crops reject: Unless it is made clear that this only applies when a product label requires it, we reject PL.16.a this as unnecessary, impractical and disproportionate Sugar reject: As above.
	PL.16.b Re-entry procedure is consistent with manufacturers' instructions where applicable		
Only mandatory where PPPs with re-entry requirements are used	PL.16.c Workers that might be affected by re-entry intervals are aware of the procedure		
PL.17 Provision is made for health monitoring of workers using PPPs (New)	PL.17.a Health checks for workers applying PPPs are defined		Crops reject: This is very vague and what is the medical and scientific basis for this? What checks are required, who undertakes them? How often? Not proportional to the sector, and brought over from fresh produce where the nature of work is very different. Is there any evidence a general health check up will be of any benefit in this case?
	PL.17.b Health check requirements as defined are offered to relevant workers		

			SUGAR reject: As above.
Refer to the DEFRA Code of Practice for Using Plant Protection Products: https://www.hse.gov.uk/pesticides/using-pesticides/codes-of-practice/code-ofpractice-for-using-plant-protection-products.htm			
PL.18 Appropriate protective equipment is made available to workers using PPPs and usage is effectively controlled (New)	PL.18.a Appropriate Personal Protective Equipment (PPE) is provided, in accordance with PPP label instructions	Should only refer to 'used PPE' ?	
	PL.18.b PPE is cleaned and maintained where required		
	PL.18.c PPE is disposed of according to manufacturers' instructions		
	PL.18.d New PPE is stored securely, separate from other materials and equipment		
	PL.18.e Reusable PPE is stored securely in a well-ventilated area separated from other clothing and materials		
	PL.18.f PPE for workers using PPPs is not transported in sprayer cabs		
	PL.18.g		
	Secure, dedicated facilities are available for workers using PPPs for storage of personal clothes		

PL.18.h Functional Respiratory Protective Equipment (RPE) is provided where required
PL.18.i Any disposable filters within RPE appear visibly operational and are within expiry date
PL.18.j Steps are taken to ensure filters are replaced whenever appropriate (e.g. RPE maintenance records with recorded filter changes)

TRACEABILITY AND ASSURANCE STATUS			
Standard	HYWBM	NFU Commentary - Technical	NFU Commentary General
AIM: Clear identification of grain leaving the farm to deliver food chain traceability			
TI.1 Key A complete combinable crops passport must accompany each load that leaves the farm (Revised)	TI.1.a Up-to-date assurance information is detailed on the passport using either an assurance sticker or a Red Tractor downloadable pdf passport		

Details on how to download a Red Tractor pdf passport can be found here: https://assurance.redtractor.org.uk/contentfiles/Farmers7098.pdf?_id=637303172236691587			
TI.1.1 Key There must be traceability up and down the production process and a system in place to pass this traceability link to the next point in the supply chain			
TI.2 Producers must retain records of the destination/ point of first tip of loads leaving the farm		Crops: Destination sometimes changes on route. Collection note when lorry is loaded should suffice.	This may not be possible in every scenario in today's grain market
TI.3 <i>It is recommended that samples are retained from all loads leaving the farm</i>	<i>TI.3.a</i> <i>Samples are kept for three months</i>		
	<i>TI.3.b</i> <i>Samples are taken in line with the AHDBs Grain Sampling Guide</i>		

AIM: Clear identification of grain on-farm to ensure on-farm traceability			
TI.4 <i>It is recommended that representative samples are taken from each storage bin/ silo/ flat store/ drying floor at the time of filling</i> <i>(Downgraded)</i>	<i>TI.4.a</i> <i>Samples are taken in line with the AHDBs Grain Sampling Guide</i>		
TI.5 Key Traceability records must be kept to identify varieties and fields of origin of crops stored in bulk/ bins			
TI.6 Certificates/ lot numbers and product name(s) of any purchased seed and seed treatment must be available		Crops: Does this include Farm Saved Seed?	

AIM: Controls are in place to maintain assurance status			
TI.7 Key Producers must not market assured and non-assured combinable crops and/ or sugar beet produced on the same holding (Revised)	TI.7.a If you are providing third party storage for non-assured combinable crops and/ or sugar beet it is physically separated from assured combinable crops/ sugar beet	Crops: Would this have to apply in all cases to a portion of a crop going to AD/ feed	
	TI.7.b Separate records are kept showing delivery and out-loading of assured and non-assured product		

VERMIN CONTROL			
Standard	HYWBM	NFU Commentary - Technical	NFU Commentary - General

AIM: effective and responsible control of birds, rodents and other animals to prevent contamination and risks to food safety and animal health			
VC.1 Key There must be effective control of vermin (Revised)	VC.1.a No build-up of weeds close to farm structures (e.g. grain stores) that may harbour vermin		
	VC.1.b A site survey is completed at least quarterly, including: <ul style="list-style-type: none"> • date of inspection • locations inspected • findings • actions required • date actions completed 		
	VC.1.c Dead/trapped vermin are disposed of		
	VC.1.d There is a defined procedure to follow in the event of vermin activity being identified		

	VC.1.e Birds, rodents and domestic animals are prevented from entering all long-term storage		
VC.2 Toxic bait must be used responsibly (Revised)	VC.2.a Prior to treatment with baits the use of non-chemical control methods is considered first followed by the least toxic alternatives	Crops: VC.2 a, in some cases using the most effective might be best for food safety.	
	VC.2.b An Environmental Risk Assessment is undertaken in accordance with the Appendix before bait is laid		
	VC.2.c Where baits are used a Bait Plan identifies location of bait points, bait used, bait point inspection and replenishment dates		
	VC.2.d Non-target animals do not have access to baits	VC.2.e – duplication as already need to record details elsewhere. What does secured mean? Scope for inconsistency.	
	VC.2.e Bait stations/ boxes are secured and are numbered and dated		
	VC.2.f Bait is only used where evidence shows it is being continuously effective		
	VC.2.g Toxic baits are only used in the grain store to treat an infestation and in such cases are regularly monitored		

ENVIRONMENTAL PROTECTION AND CONTAMINATION CONTROL			
Standards	HWYBM	NFU Commentary - Technical	NFU Commentary - General
AIM: There is good knowledge of the farm environment and risks are identified and managed appropriately			
EC.1 A farm map must be present and areas of specific risk are identified (Revised)	<p>EC.1.a • Farm Map Consolidation of map Areas at high risk of pollution are identified on the farm map requirements into one and this may be held as a hardcopy or as an electronic copy.</p> <p>EC.1.b One or more maps may be used standard for efficiency</p> <p>EC.1.c Soil types and areas prone to soil management problems (compaction, slumping, erosion, runoff or leaching) are identified on the farm map</p> <p>Site map references for granular nitrogen fertiliser storage are recorded (six figure Easting and Northing reference, e.g. 123456/ 456789)</p> <p>Inclusion of soil</p>	<p>Crops: Consistency issues. All areas have some risk of leaching due to local conditions, growers will be best placed to consider this at the time.</p> <p>What three words an alternative.</p>	
AIM: Soil is managed in a way that helps maintain soil condition			

<p>EC.2 A Soil Management Plan must be established and implemented <i>(Revised)</i></p>	<p>EC.2.a The Soil Management Plan is farm specific and updated as and when changes occur</p>	<p>Crops: Would this not require an organic matter baseline and continuous assessment to be audited consistently? Impossible.</p>	<p><u>CROPS reject</u> This is a bureaucratic standard focussed on the record not the outcome. The standard should focus on demonstrating soil management planning, not the paper plan</p> <p><u>SUGAR reject</u> As above.</p>
	<p>EC.2.b It includes:</p> <ul style="list-style-type: none"> • strategies to reduce the risk of erosion and runoff • strategies to reduce risks to soil health including management of soil organic matter 		
	<p>EC.2.c Implementation of the plan is reviewed</p>		

EC.3 Risks to soil must be considered before any work is carried out (New)	EC.3.a Timing of work is optimised to ensure minimum impact on soil		CROPS reject No clarity over how this standard is auditable. Not objective. Grower judgment essential in these matters. SUGAR reject ‘Considered’ is not defined. This is not auditable or required. Weather and ground conditions are changeable and must not be restricted beyond the grower’s own judgement.
	EC.3.b Soil conditions and type of equipment are taken into account		
EC.4 Soil testing must be completed at least every five years where organic manures or manufactured fertilisers are applied (New)	EC.4.a Soil tests are completed for each field where organic manures or manufactured fertilisers are applied	Reference to AHDB Nutrient management Guide.? NVZ planning already a requirement	CROPS Soil testing is largely established in the sector, so this is duplicating existing actions. Soil testing should be done on blocks of land managed in a similar way to avoid disproportionate cost. SUGAR
	EC.4.b At a minimum, soils are tested for phosphorus (P), potassium (K), magnesium (Mg) and pH		
	EC.4.c Soil nitrogen (N) levels are determined by either soil testing or by assessing soil nitrogen supply		
	EC.4.d Results are used to plan nutrient applications		

			This does not need to be audited as it is common farm practice.
AIM: No chemical or physical contamination, pollution or spread of disease from any potential contaminants or wastes			
EC.5 Key Potential pollutants must be stored in a manner that minimises the risk of contamination and pollution to crops, feedstuffs, animals, soils, groundwater and watercourses <i>(Revised)</i>	EC.5.a Fuel tanks are bunded where required by legislation	<i>Duplication in EC.5.a: already legislation covering this.</i>	<u>CROPS reject:</u> This standard duplicates legal requirements with no obvious value to scheme members and no insight into the underlying risk in the sector. No attempt has been made to even start a roadmap for RT to deliver earned recognition for Farming rules for Water As such, it is difficult to support this standard <u>SUGAR: reject</u> As above.
	EC.5.b Where fuel tanks are un-bunded, they are checked regularly and measures are in place to manage spillages/ leaks		
	EC.5.c PPPs are kept in a locked store with access only given to trained and authorised personnel		
	EC.5.d Manufactured fertiliser is stored on a hard, dry surface		

	<p>EC.5.e Liquid fertiliser is stored in suitable tanks or bowsters:</p> <ul style="list-style-type: none"> • liquid fertiliser tanks are either bunded or have lockable or removable tap handles • measures are in place to manage spillages/ leaks <p>EC.5.f Any fertiliser spillage can be contained</p> <p>EC.5.g Organic manures are not stored:</p> <ul style="list-style-type: none"> • within 10m of inland freshwaters or coastal waters • within 50m of a spring, well or borehole • where there is significant risk of run-off entering watercourses <p>EC.5.h Fertilisers that pose a combustion or oxidiser hazard are not stored with PPPs or flammable materials</p>		
<p><i>Potential pollutants include PPPs, fertilisers – manufactured and organic, anaerobic digestate, fuel oil, empty containers, disinfectants, baits</i></p> <p><i>Risk factors which could lead to runoff, which should be taken into account are: slope (especially if greater than 12 degrees), ground cover, proximity to watercourses or wetlands, weather conditions and forecasts, soil type and condition, presence and condition of land drains</i></p> <p><i>PPP's are defined as any product with a current MAPP number</i></p>			

AIM: Plant Protection Products (PPPs) are stored and managed in a safe and responsible manner to prevent contamination and pollution

EC.5.1 Key PPP store requirements strengthened to better manage risk to The PPP store must be of a suitable design, construction and layout environment (Revised)	EC.5.1.a The store has adequate ventilation		
	EC.5.1.b The lighting within the store is sufficient to read product	For farms with small stores, the lighting may not be 'within'	
	EC.5.1.c The store is frost-proof	EC.5. 1 e- RT could produce a sign and template. A standard spray store sign should suffice.	
	EC.5.1.d The store is away from areas presenting a risk of fire and at least 4m away from flammable materials, sources of ignition		
	EC.5.1.e Warning signs on or adjacent to, the door including: <ul style="list-style-type: none"> • general warning sign • no smoking sign • naked flames prohibited sign 		
	EC.5.1.f Liquids cannot contaminate granules and powders		
	EC.5.1.g Fixed shelving is strong enough to support product		

	<p>EC.5.1.h The store is able to retain leakage or spillage to a volume of 110% of the total quantity of products likely to be stored, or 185% in an environmentally sensitive area (where notified by an EPO)</p> <p>EC.5.1.i An outside cage is only used where the product is supplied in a container designed specifically for outside storage</p> <p>EC.5.1.j Segregation of product and empty packaging</p> <p>EC.5.1.k Emergency phone numbers are displayed</p>	.h EPO- needs definition	
	<p>EC.5.1.l A spill kit is available</p> <p>EC.5.1.m A first aid kit, including eye wash, is available</p> <p>EC.5.1.n A fire extinguisher is available</p>		
HSE guidance on storing pesticides for farmers and other professional users: https://www.hse.gov.uk/pubns/ais16.pdf			
EC.6 In the case of packaging breakages PPPs must be transferred to a suitable container	<p>EC.6.a PPPs are transferred to a suitable container with appropriate safe closure cap or bag tie</p> <p>EC.6.b The original label information is displayed</p>		

EC.7 Key PPPs must be approved for use	EC.7.a Un-approved product is kept in a segregated area of the pesticide store, pending collection for disposal at the earliest opportunity; clearly marked with signs / labels stating that it must not be used		
EC.7.1 A list of stored PPPs must be available and updated on a minimum monthly basis			<i>Irrelevant, most arrives on farm just before. Suggest Seasonal at most- disproportionate and doesn't reflect the nature of PPP use.</i>
AIM: Fertilisers are stored and managed in a safe and responsible manner to prevent theft, contamination and pollution			
EC.8 Nitrogen based fertilisers must be stored in a way that minimises the risk of theft (Revised)	EC.8.a Stored in a secure building or compound where there is no public access		

	<p>EC.8.b</p> <p>Not closely located to or visible from a public highway</p>		<p>Crops Reject:</p> <p>If secure irrelevant and impractical for many farms with buildings close to the road. 'Visible from the Public highway is very imprecise</p>
	<p>EC.8.c</p> <p>Not stored in fields overnight (unless in exceptional circumstances beyond your control in which case fertiliser is sheeted and the incident is recorded)</p>		<p>CROPS reject</p> <p>Storage in field overnight: Not proportionate to the risk. Hard to justify for non-AN products. Very impractical. How is EC.8.d to be audited. EC.8.e acceptable.</p> <p>SUGAR: reject</p> <p>As above.</p>
	<p>EC.8.d</p> <p>Checks are made to ensure manufactured fertiliser has not been tampered with, moved or stolen</p>		
	<p>EC.8.e</p> <p>Any theft or losses are reported to the police immediately (Tel: 101) as detailed in the Appendix</p>		
<p>EC.9</p> <p>A list of stored manufactured fertiliser must be kept and updated regularly</p>	<p>EC.9.a</p> <p>Physical stock checks are carried out regularly</p>		<p><i>Only when material changes occur</i></p>

EC.10 If storing more than 25 tonnes in total of fertilisers with an oxidiser warning symbol on the bag or container you must notify the Fire and Rescue Service and HSE (<i>Upgraded and revised</i>)	EC.10.a The Dangerous Substances warning symbol is displayed at each access point to the site		CROPS reject. Under Dangerous Substances (Notification and Marking of Sites) Regulations (NAMOS) 1990: Display yellow triangle danger (with black exclamation mark) sign at site (farm) entrance and yellow diamond oxidizing sign on store. This already covers the signage at the farm entrance , and the store so the standard is excessive and presents the wrong image of farms with the 'dangerous substances symbol at each access point'. Is that really the image we wish to present of to the public? Members are also concerned about this advertising products to thieves. SUGAR: reject As above.
	EC.10.b Fertiliser stores containing product with the 5.1 Oxidising Hazard Symbol have signage on the exterior of the store		
	EC.10.c Sites storing more than 150 tonnes of fertilisers which contain Ammonium Nitrate, where the Nitrogen content is greater than 15.75%, notify the Fire and Rescue Service		

For information on the importance of fertiliser security, visit www.secureyourfertiliser.gov.uk

AIM: PPPs are correctly handled and applied to prevent contamination and minimise impact on the wider environment

EC.11
PPPs must be appropriate for their intended use
(Revised)

- EC.11.a
PPPs are used in accordance with manufacturer's label instructions
- EC.11.b
The Defra Code of Practice for Using Plant Protection Products is adhered to and particular attention is given to:
- environmental impact and residue levels
 - maximum permitted dose rates
 - any relevant risks if reduced dose rates are used
 - restrictions on repeated applications to a single crop
 - rotation of modes of action (where possible)

For a list of approved pesticides, visit www.pesticides.gov.uk

EC.12
PPPs are mixed/ handled in a manner that minimises the risk of contamination and pollution
(Revised)

EC.12.a
Where used, measuring equipment (e.g. jug or bucket) is dedicated to this purpose, non-glass, clean and free of accumulated residues and numbering is sufficiently legible to enable accurate measurement

EC 12 B. rare for scales to be used. Granules and powders often come with a measuring scoop.

	EC.12.b Where used, weighing scales are dedicated to this purpose and are calibrated at least annually		Calibrate against another scale sufficient.
	EC.12.c		
	Any dedicated PPP filling areas are designed to effectively contain any drips or spills generated by filling and washing of PPP application equipment		
	EC.12.d Where a dedicated filling area is not in place, a suitable alternative provision is present to control this risk (e.g. a suitably functional drip tray and selection of filling locations distanced from water courses, boreholes/springs/wells)		
	EC.12.e Any alternative provisions used are managed appropriately to ensure they do not themselves present a risk of contamination to personnel or environment		
EC.13 Key PPPs must be applied in a manner that minimises the risk of contamination and pollution (Revised)	EC.13.a <i>PPP application does not occur in areas of high pollution risk, as identified on farm map (EC.1)</i>		CROPS: Concern 48 hours is too inflexible and does not allow for advantage to be taken of small weather windows. Also difficult to audit if done via direct contact.
	EC.13.b <i>PPP application does not occur in unsuitable conditions e.g. when there is a risk of drift or where soil conditions are unsuitable e.g. waterlogged, flooded or snow-covered soil or where the soil has been frozen for more than 12 hours in the previous 24 hours</i>		

	<p>EC.13.c <i>Care is taken when applying near hedgerows, woodlands, wetlands, private homes or public places e.g. schools, parks, playgrounds</i></p> <p>EC.13.d</p>		<p>SUGAR: PPPs are authorised with clear risk assessments. Growers apply PPPs responsibly, and only when thresholds are met. This revision is excessive and not auditable. Many growers have direct contact with local bee keepers but this should not be an auditable requirement.</p>
	<p>Local beekeepers are given at least 48 hours' notice of the intention to apply a PPP that is hazardous to bees, via direct contact/ BeeConnected/equivalent</p> <p>EC.13.e Buffer zone requirements of the PPP being applied are complied with</p>		
<p>EC.14 PPP application must be undertaken by competent operators (Revised)</p>	<p>EC.14.a NPTC Pesticide Application Certificates or a suitable equivalent are held</p> <p>EC.14.b National Register of Sprayer Operators (NRoSO) registration is held</p> <ul style="list-style-type: none"> BASIS Prompt or registration with the BPCA CPD scheme is held instead of NRoSO for those applying grain store insecticides 		

PPP application operators also include those applying granular/ dust PPPs, post-harvest treatment or seed treatment			
EC.15 All PPP application equipment must be maintained and tested	EC.15.a Frequency of testing is carried out as follows:		Crops: Should be clear PTO Fertilizer spreaders should only be included when used for PPPs
		Equipment	Testing frequency
		3m+ boom sprayer	Annual NSTS test
		Granular nematicide applicator	
		Slug pelleter (including electric spinning disc and hydraulic/ PTO fertiliser spreaders)	NSTS tested every six years
		≤3m/ granular herbicide applicator (boom type)	
		Handheld/ knapsack sprayers	No testing required
	EC.15.b Equipment calibration occurs between seasons of use, as a minimum		

	<p>EC.15.c Equipment used to apply granular PPPs is calibrated whenever there is a change of product</p>	<p>Suggest 12 months or a clearer period to avoid conclusion around use close to change of season.</p> <p>EC. 15. C only for 'product not previously used'</p>	
<p>Information on sprayer certificates of competency can be found at www.cityandguilds.com</p> <p>Details of NSTS approved test centres can be found at www.nsts.org.uk</p>			
<p>EC.16 PPPs must be transported in manner that minimises the risk of contamination and pollution</p>	<p>EC.16.a Transporting product through water/ crossing watercourses is avoided wherever possible</p>	<p>EC. 16.c or another area where one is present that performs the same function.</p>	
	<p>EC.16.b Diluted PPPs:</p> <ul style="list-style-type: none"> valves which control the flow of the PPP to the spraying equipment are shut during transport unless constant agitation is specifically mentioned on the label hoses, nozzles and other fittings are maintained in line with manufacturer's instructions 		
	<p>EC.16.c Undiluted PPPs:</p> <ul style="list-style-type: none"> transported in a secure chest/ cabinet/ container 		

EC.16.1	EC.16.1.a		
Where metaldehyde is used, it must be used in a manner that reduces the risk to water, birds and small mammals	Appropriate active per hectare has been used to avoid drainage and run-off		
	EC.16.1.b No applications are made during heavy rain or when drains are flowing		
	EC.16.1.c Consideration is given to the proximity of watercourses, as demonstrated on the farm map(s)		
	EC.16.1.d Consideration is given to the maximum permitted dose rate and maximum application rates		
For information about the responsible use of metaldehyde, see: www.getpelletwise.co.uk			
EC.16.2 Where granular nematicides are used, use must be in accordance with the Nematicide Stewardship Programme (NSP) Best Practice Protocol (Revised)	EC.16.2.a Staff applying granular nematicides hold a PA4G certificate		
	EC.16.2.b Staff applying granular nematicides have complete ARTIS elearning modules on an annual basis		
	EC.16.2.c The applicator is checked prior to the start of the season and on each working day to ensure all pipework is correctly fitted, the hopper bungs are in place and the hopper lids are secure. When the applicator is in use, granules are monitored to check they are flowing correctly		

	<p>EC.16.2.d The applicator must be able to turn off the flow of granules before the row</p>		
	<p>EC.16.2.e Designated areas for filling hoppers in each field are used which can easily be checked for spillages. Spillages should be dealt with according to manufacturer's recommendations and the NSP protocol to ensure no granules are left on the surface</p>		
	<p>EC.16.2.f Treated fields are checked 24–48 hours after application for any adverse effects to wildlife. If any are found, contact the Wildlife Incident Investigation Scheme (WIIS) and the granule manufacturer</p>		
<p>EC.16.3 Anyone making recommendations on PPP use must be on the BASIS Professional Register <i>(Revised)</i></p>			
<p>EC.17 Surplus spray mix must be dealt with in a manner that minimises the risk of</p>	<p>EC.17.a Surplus spray mix is sprayed onto designated areas (e.g. crop left specifically for the purpose) and the maximum rate is not exceeded, or securely stored pending collection by a registered waste contractor</p>		

contamination and pollution	EC.17.b Tank washings and rinsates are treated in a biobed or biofilter under a registered waste exemption or disposed directly to the ground in accordance with an appropriate permit		
EC.18	EC.18.a	Compatibility of the list in EC18.b with crop recording software needs clarifying	CROPS reject: Technical point needs clarifying before this can be supported SUGAR: reject As above
Records must be kept of all PPP applications	Records are kept of all PPP applications, including PPPs used to treat seed, in-field PPPs, pre-harvest crop store PPPs, postharvest PPPs and diatomaceous earths		

	<p>EC.18.b</p> <p>Records include:</p> <ul style="list-style-type: none"> - field/ store identifier for post-harvest treatments - crop/ variety - total area - sowing or planting date - date and time applied - justification/ target for application - product name and active ingredient - rate of application - water volume - wind direction and speed - harvest interval - first permissible harvest date - name of sprayer operator 		
<p>EC.18.1</p> <p>Systems must be in place to ensure statutory harvest intervals for PPPs are complied with</p>	<p>EC.18.c</p> <p>Records are kept for at least 3 years</p>		

AIM: Fertilisers and other soil amendments are legal, suitable for their intended use and applied in a manner that prevents pollution and contamination			
EC.19 An up-to-date Nutrient Management Plan (NMP) must be established and implemented when applying organic manures and/ or fertilisers to land (Revised)	EC.19.a The NMP includes, as a minimum, the following: <ul style="list-style-type: none">calculations of the total area required to apply organic manuresareas where fertilisers and organic manures can and cannot be applied – detailed on a mapnutrient content of fertiliser and organic manures	Nutrient values of organic manures will be based on standard values	CROPS reject: High risk of a bureaucratic standard i.e. the wording of the standard does not match the evidence requirement. This standard duplicates legal requirements with no obvious value to scheme members and no insight into the underlying risk in the sector. No attempt has been made to even start a roadmap for RT to deliver earned recognition for Farming rules for Water SUGAR: reject As above.
	EC.19.b Applications of fertilisers and organic manures are planned to meet but not exceed soil and crop nutrient needs		
Further detail can be found in the AHDB’s RB209 document and through Tried & Tested: https://ahdb.org.uk/nutrient-management-guide-rb209 www.nutrientmanagement.org/2-nutrient-management-plan			

<p>EC.20 • Documentary evidence must be kept which demonstrates that manufactured fertiliser is responsibly sourced and traceable, e.g. from a Fertiliser Industry Assurance Scheme (FIAS) approved supplier (New)</p>			
<p>For more information about FIAS see: www.aictradeassurance.org.uk/fias/documents/fias-standards</p>			

EC.21 Key Manufactured fertilisers and organic manures must be applied in a manner that minimises the risk of contamination and pollution <i>(Revised)</i>	<div data-bbox="535 341 1288 469"> <p>EC.21.a Any materials, including waste materials, that are applied to land have agricultural benefit</p> </div> <div data-bbox="535 469 1288 564"> <p>EC.21.b Exemptions/ permits to use waste materials are held</p> </div> <div data-bbox="535 564 1288 1189"> <p>EC.21.c Before application the following factors are considered:</p> <ul style="list-style-type: none"> ○ NVZ restrictions o soil type o soil condition o results of soil testing o crop requirements o slope o weather conditions o the location of watercourses o water supplies and abstraction points (including on neighbouring land) ○ location of field margins/ hedges/ other areas where applications should not be made ○ application machinery travelling conditions </div>
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	<p>EC.21.d Applications are not carried out during high risk times e.g. on waterlogged, flooded or snow-covered soil or where the soil has been frozen for more than 12 hours in the previous 24 hours</p>		
	<p>EC.21.e Organic manures are not applied within:</p>		
	<ul style="list-style-type: none"> - 10m of any inland freshwaters or coastal waters (or 6m if using precision equipment) - 50m of a spring, well or borehole 		
	<p>EC.21.f Manufactured fertiliser is not applied within 2 metres of inland freshwaters or coastal waters</p>		
	<p>EC.21.g Biosolids are assured under the Biosolids Assurance Scheme</p>		
	<p>EC.21.h Untreated sewage sludge, untreated abattoir or catering derived animal by-products are not applied</p>		
	<p>EC.21.i Applications are made in accordance with Appendix</p>		

EC.21.1 Anyone making recommendations on manufactured fertiliser use must be on the FACTS Professional Register (Revised)		Crops: Farmers must be able to make their own decisions to alter and amend as per conditions. Should only apply to external advice.	
EC.22 All manufactured fertiliser application equipment must be maintained and calibrated at least annually (Revised)			
EC.23 All organic manure application equipment is checked at least annually (New)			CROPS reject: Very vague and impossible to audit. SUGAR reject: Not required.

<p>EC.24 Records must be kept of all applications of manufactured fertilisers and organic manures (New)</p>	<p>EC.24.a Records include: o field identifier o date o product type o product quantity o method of application o name of operator or contractor</p>		<p>CROPS Duplicate the nutrient management planning standard – should be removed</p> <p>SUGAR As above</p>
<p>AIM: No chemical or physical contamination, pollution or spread of disease from any potential contaminants or wastes</p>			
<p>EC.25 Systems are in place to manage waste responsibly (New)</p>	<p>EC.25.a Opportunities are considered for: o reducing the production of waste o re-using waste o recycling waste, plastics in particular</p>		
<p>EC.26 Key All wastes which cannot be utilised are disposed of in a manner that minimises the risk of contamination and pollution (Revised)</p>	<p>EC.26.a Wastes are disposed of by a registered waste carrier</p> <p>EC.26.b Wastes are not burnt, with the exception of vegetation and untreated wood</p> <p>EC.26.c Empty PPP containers are:</p>		<p>CROPS: Must allow a farmer to transport own waste to a recycling centre or facility if done securely and properly. This could be a recommendation rather than a standard</p>

	<ul style="list-style-type: none">○ cleaned using an integrated pressure rinsing device, or triple rinsed appropriately and the rinsate returned to the spray tank○ stored securely ○ not reused ○ returned to the supplier or where non-returnable, disposed of via a licenced waste carrier	Most of this section is a duplication of EA requirements
	EC.26.d Redundant PPPs are disposed of via the supplier or a registered waste carrier	
<p>Public register of waste carriers, brokers and dealers (England): https://environment.data.gov.uk/publicregister/view/search-waste-carriers-brokers</p> <p>Public register of waste carriers, brokers and dealers (Northern Ireland): https://www.daerani.gov.uk/articles/registered-waste-carriers-transporters</p> <p>Public register of waste carriers, brokers and dealers (Scotland): https://www2.sepa.org.uk/wastecarriers Public register of waste carriers, brokers and dealers (Wales): https://naturalresources.wales/permits-andpermissions/waste-carriers-brokers-and-dealers-public-register/?lang=en</p>		

ENVIRONMENT IMPACT/ CONSERVATION AND SUSTAINABILITY			
Standard	HYWBM	NFU Commentary - Technical	NFU Commentary - General
AIM: to minimise the adverse impact the farming operations have on the environment			
El.1	El.1.a		
Producers must be aware of any practices that have an adverse environmental impact	Important features of biodiversity and conservation value are identified on and around the farm		
	El.1.b Practices are adopted to minimise detrimental impact on such features		

<p>EI.2 Producers who are planning to use land classified as uncultivated or seminatural for arable production must ensure that Environmental Impact Assessment (EIA) regulations have been met. If any of this land is used to produce energy crops, information must be retained relating to possible carbon losses</p>	<p>EI.2.a Records of conversion of land must be kept for five years and must include: area, previous land type, cultivation method</p>	<p>CROPS These two standards are likely to become outdated when the new RED requirements become available. Standards will then have to be completely re-issued to members causing confusion and a feeling of a lack of consultation.</p> <p>NFU has always been of the view that this must be clarified before V5 was consulted upon.</p>
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<p>EI.3 Key Crops and sugar beet that may be used to produce biofuels and bioliquids must not be produced on land that had one of the following statuses on or after Jan 2008:</p> <ul style="list-style-type: none">• a high biodiversity value• land with high carbon stock• land that was peatland unless evidence is provided that the cultivation and harvesting does not involve drainage of previously undrained soil	<p>EI.3.a Further details and definitions are outlined in the Appendix – these are complied with</p>	<p>These two standards are likely to become outdated when the new RED requirements become available. Standards will then have to be completely re-issues to members causing confusion and a feeling of a lack of consultation.</p> <p>NFU has always been of the view that this must be clarified before V5 was consulted upon.</p>
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IPM			
Standard	HYWBM	NFU Commentary - Technical	NFU Commentary - General
AIM: the principle of Integrated Pest Management are followed on-farm			
IM.1 Integrated Pest Management (IPM) must be in place to proactively manage crop production (Revised)	IM.1.a An IPM Plan is documented and followed		Crops: Question whether IM.1.c adds anything. Covers 'all areas' of good agricultural practice is very broad and general with the potential for inconsistent audits. SUGAR: Excessive addition. IPM plans by nature cover this. PPPs are used as a last resort in response to weeds, pests or diseases, if and when thresholds are met. Growers use PPPs efficiently and responsibly as per the label.
	IM.1.b The IPM Plan is discussed with relevant staff, advisers and contractors		
	IM.1.c The IPM Plan covers all areas of good agricultural practice with an emphasis on optimising the use of PPPs and protection of the environment		

For a template IPM plan visit: https://voluntaryinitiative.org.uk/schemes/integrated-pest-management/			
IM.2 Regular crop inspections must be undertaken and recorded			
IM.3 Relevant pests, diseases and weeds must be monitored regularly and recorded	IM.3.a Recording is carried out directly or through participation in a relevant prediction programme	Wording should be amended to: Thresholds are used, where they exist.	Crops: Could be combined with IM.3
	IM.3.b Thresholds are used to avoid the routine application of PPPs		

IRRIGATION			
Standard	HYWBM	NFU Commentary - Technical	NFU Commentary – General
AIM: sustainable use of water			
IG.1 Water used for irrigation must meet microbiological requirements <i>(Revised)</i>	IG.1.a Water samples are tested at the frequency outlined as follows: o mains water – no test o rainwater – no test o borehole/ well water (untreated) – annual test o surface water (untreated); river/ canal/ stream – annual test		SUGAR: reject Double standards. No cost-benefit analysis. Beet is washed off at the factory with often dirty water. For growers, this proposed standard means that water may have to be tested even though it's put on months before the beet is lifted but the processor can continue to wash beet off in the factory as they are doing now.
	IG.1.b Corrective action is taken in response to results that fall outside a max acceptable level – indicator of faecal contamination: E.coli <10,000CFU/ 100ml		
	IG.1.c Laboratories used are ISO/IEC 17025 accredited and <i>E. coli</i> testing of water samples is included within the detail of accreditation		

IG.2 Untreated sewage water must not be used	IG.2.a No evidence that untreated sewage water (defined as water contaminated with human and/ or municipal waste) has been used on crop production sites		
AIM: Water use on-farm is optimised and sustainable			
IG.3 Where irrigating a Water Management Plan must be produced and used to identify opportunities for water use efficiency and reducing waste (Upgraded)			
<i>Examples of opportunities for more efficient use of water and reducing waste may include:</i> <ul style="list-style-type: none"> • computer modelling of crop's water requirements • irrigating at night • maintenance plans to reduce possibility of leakage • storage of winter storm water • water usage audit 			
IG.4 Crop irrigation must be based on an identified need (Revised)	IG.4.a Irrigation need is identified through reference to suitable data sources – e.g.: o moisture measurement o crop walking records o weather station data		

IG.5 Records must be kept of irrigation water usage (Revised)	IG.5.a Records include: o water source o volume o timing		
IG.6	IG.6.a		
Licenses are in place where required for water used on farm	A valid licence or permit is in place for use of any ground water or surface water used for irrigation	Crops: Legislative duplication -	
	IG.6.b Any licensing conditions (e.g. permitted volume or timing of abstraction) are complied with		

STORAGE OF COMBINABLE CROPS			SUGAR Must be made clear that this section is not applicable or auditable for sugar beet.
Standard	HYWBM	NFU Commentary - Technical	NFU Commentary - General
AIM: to prevent crop being contaminated by equipment			
ST.1 Key All equipment which comes into contact with grain must be thoroughly cleaned prior to use (Revised)	ST.1.a All equipment is clean and dry before use		
	ST.1.b Trailers and/ or loading buckets that have been used to move/ transport FYM or similar materials are cleaned, power washed, sanitised with a combined food grade detergent/ disinfectant and are dry before use		
Examples of equipment include that used for harvesting, transporting, handling, conveying, loading etc....			
AIM: storage conditions do not compromise food safety or crop quality			
ST.2 Key	ST.2.a The AHDB Grain Storage Guide is followed		

The condition of crops must be determined as they go into store and an assessment made of storage and conditioning requirements <i>(Revised)</i>	ST.2.b The Safe Storage Calculator, or equivalent, has been used		
AHDB Safe Storage Guide: https://ahdb.org.uk/grainstorage , Safe Storage Calculator: https://ahdb.org.uk/safe-storage-time-calculator			
ST.3 Key The condition of stored crops must be monitored <i>(Revised)</i>	ST.3.a Monitoring timeline is outlined by your storage strategy ST.3.b Any temperature rises, identified during monitoring, are investigated and action taken ST.3.c Any water ingress, identified during monitoring, is investigated and action taken ST.3.d Records are kept of: o temperature o moisture o dates of all checks o follow-up action taken		

ST.4 Moisture meters and temperature probes must be calibrated annually and records kept			
ST.5 Key Insect traps must be used in stored crops <i>(Revised)</i>	ST.5.a Insect traps are monitored in line with the timeline outlined by your storage strategy		
	ST.5.b Records are kept of: o dates of checks o insect activity o follow-up action taken		

AIM: the use of drying equipment does not compromise food safety or crop quality			
ST.6 Drying equipment must be regularly maintained			
ST.7 Drying equipment must be operated in line with manufacturer's instructions in a manner that prevents contamination	ST.7.a Fuel used in oil-fired driers meets commercial BSi or ISDN/ ISO fuel standards		
	ST.7.b Waste oil is not used		
AIM: to prevent crop contamination by the fabric of the store			
ST.8 Key Walls, floors and horizontal surfaces within storage, holding or reception facilities must be clean prior to use (Revised)	ST.8.a There are no diesel or hydraulic fuel residues		
	ST.8.b Insect trapping is carried out before use to ensure cleaning operations have been successful		
	ST.8.c Where old crop remains in store, the store is cleaned without effecting the crop which remains in store		

ST.9 Key If livestock buildings are intended for use as crop storage or temporary holding facilities they must be thoroughly cleaned, power washed and sanitised with a combined food grade detergent/ disinfectant and left to dry before use <i>(Revised)</i>			
The Defra Code of Practice for the Control of Salmonella: file:///C:/Users/cath.lehane/Downloads/defra-salmonella-feed-code-of-practice%20(2).pdf			
ST.10 Stores must be inspected immediately prior to use	ST.10.a Store cleanliness is checked		
AIM: to prevent crop contamination caused by the construction of the store			
ST.11 Key Buildings must be weatherproof	ST.11.a No ingress of water		

ST.12 Key Controls must be in place to protect crops from contamination with any broken glass or hard plastic (Revised)	ST.12.a Where glass and hard plastics cannot be covered regular checks are made to ensure there is no damage		Question the need for a separate register for this, why can't it be recorded on the general register
ST.13 Loading areas outside crop storage must be maintained in a clean and well drained condition	ST.13.a No contamination of crops during loading		
AIM: storage of crops in temporary stores does not compromise food safety or crop quality			
ST.14 Key Temporary stores can only be used for the storage of crops until the 31st October (Revised)	ST.14.a In exceptional circumstances, where this date cannot be met, a derogation has been sought and received from your Certification Body	Must make it clear to growers and auditors that this does not apply to sugar beet	
ST.15 Key The roofs, floors and walls of temporary stores must be of a suitable construction which prevents crops becoming contaminated with earth, stones or debris (Revised)	ST.15.a Bitumen is not used for new floors or as a filler		
	ST.15.b Oilseeds do not come into contact with bitumen		
	ST.15.c Flooring must be solid with no deterioration which leads to stored crops being contaminated with loose flooring material		

AIM: storage of crops in permanent stores does not compromise food safety or crop quality			
ST.16 Key Buildings must have suitable and solid roofs, floors, walls and doors	ST.16.a No ingress of rodents or birds		
	ST.16.b Bitumen is not used as a new floor or as a filler		
	ST.16.c Oilseeds do not come into contact with bitumen		
	ST.16.d No deterioration of flooring leading to stored crops being contaminated with loose flooring material		
AIM: holding crops outside temporarily does not compromise food safety or crop quality			
ST.17 Key The holding of grain outside must only occur in exceptional circumstances, for a maximum of five days (Revised)	ST.17.a Grain is kept on a clean concrete base or other sealed/impervious surface		
	ST.17.b Grain is covered when not being worked		
	ST.17.c Records are kept of: o the reason for grain being held outside o the condition of grain o the length of time grain was held outside (dates and times)		
	ST.17.d If outside holding of grain needs to be extended for more than five days, a derogation is sought from the Certification Body		

<i>Exceptional circumstances could include delayed collection outside growers’ control where there are no storage facilities, grain waiting to be dried during a wet harvest, breakdown of a drier</i>			
AIM: to prevent cross contamination occurring during crop storage			
ST.18 GM crops or other GM material must not be stored with non-GM crops unless separated by a rigid physical barrier			

<i>An example of GM material includes some animal feeds</i>			
ST.19 Treated seed must not contaminate stored grain (Revised)	ST.19.a This is achieved through secure segregation/ a rigid physical barrier/ separated by a distance of at least 3m		

OWN-TRANSPORT FOR OFF-FARM DELIVERY (n/a if vehicles are TASCC certified)			
Standard	HYWBM		
AIM: traceability is maintained throughout the haulage process			
OT.1 All trailers must be identified using your Red Tractor membership number and an individual trailer ID (Revised)	OT.1.a Red Tractor membership numbers and individual trailer IDs are displayed on the rear and, at least, one side of the trailer and are easily visible		CROPS The value of this standard is not clear especially for farms delivering to a single central store. More clarity is needed on the value Vs cost. SUGAR Excessive standard.

Members should check with their customers to ensure membership numbers and IDs are displayed in a location that is easily visible			
OT.2 Records must be kept of all vehicles or trailers owned, hired or leased	OT.2.a Records include: <ul style="list-style-type: none"> ID number date of purchase/ hire/ lease date of disposal 		
AIM: no contamination of grain during transport			
OT.3 Key All vehicles, trailers and sheets must be clean, inside and out, before use <i>(Revised)</i>	OT.3.a If vehicles/ trailers/ sheets have carried anything other than combinable crops/ sugar beet you refer to the AIC Haulage Exclusion and Sensitive lists to determine: <ul style="list-style-type: none"> whether you can use the vehicle/ trailer/ sheet for combinable crops/ sugar beet again if you can continue to use the vehicle/ trailer/ sheet for combinable crops/ sugar beet, what the process is for cleaning it 	Not relevant for sugar beet.	SUGAR: reject Not relevant for sugar beet.
	OT.3.b Vehicles/ trailers/ sheets are cleaned according to the requirements in the AIC Haulage Sensitive list		
	OT.3.c Vehicles are inspected to ensure they are clean before loading		

The AIC TASCC Haulage Exclusion List provides details of products which, if they have been carried in your vehicle/ trailer, mean that vehicle/ trailer cannot be used for combinable crops/ sugar beet again: <https://www.aictradeassurance.org.uk/latest-documents/aic-haulage-exclusion-list-appendix-1/>

The AIC TASCC Haulage Sensitive List provides details of products which, if they have been carried in your vehicle/ trailer, require specific actions to clean the vehicle/ trailer out: <https://www.aictradeassurance.org.uk/latest-documents/tascc-sensitive-list-appendix-2/>

For anything else that is not covered in these lists you can clean your vehicle/ trailer as you see fit

OT.4 Records are kept of the vehicle's/ trailer's three previous loads			
OT.5 Vehicles/ trailers carrying combinable crops must be sheeted during delivery off-farm	<i>* sugar beet trailers do not need to be sheeted</i>	Must me made clear that sugar beet trailers do not need to be sheeted.	