



## FJC Standards Revisions Master List of Changes October 2015 – February 2017

\* All old language taken from [October 2015 FJC Standards in Draft \(English version\)](http://www.agriculturaljusticeproject.org/media/uploads/2016/06/23/AJP-Standards-Public-Comment-Oct-2015.docx)  
(<http://www.agriculturaljusticeproject.org/media/uploads/2016/06/23/AJP-Standards-Public-Comment-Oct-2015.docx>)

### DEFINITIONS

#### Adding definition for Agroecological:

##### **An Ecological Definition of Sustainable Agriculture**

By Professor Stephen R. Gliessman

##### **Sustainable agriculture:**

A whole-systems approach to food, feed, and fiber production that balances environmental soundness, social equity, and economic viability among all sectors of the public, including international and intergenerational peoples. Inherent in this definition is the idea that sustainability must be extended not only globally but also indefinitely in time, and to all living organisms including humans.

##### **Sustainable agroecosystems:**

- Maintain their natural resource base.
- Rely on minimum artificial inputs from outside the farm system.
- Manage pests and diseases through internal regulating mechanisms.
- Recover from the disturbances caused by cultivation and harvest.

**Removed definition for blacklisting** due to removing this term from the Standards and replacing it with “retaliation” throughout the Standards.

**Changed the definition of Buyer from:** "The broker, wholesaler, integrator, retailer, or processor to whom the farmer sells. Buyers are both the closest links to the farmer, as well as the buyers who take custody of the product throughout the food chain." **New Definition of Buyer:** The broker, wholesaler, integrator, retailer, or processor to whom the farmer sells. Buyers are the closest links to the farmers.

**Added definition for Democratic Process:** A democratic process is a practice that allows democracy to exist. Democracy is based on the idea that everyone should have equal rights and be allowed to participate in making important decisions. It is a form of governance that facilitates transparency and equal participation, either directly (through elected leaders) or indirectly in the proposal, development and establishment of all policies that run the organization



**Family-Scale Farm:** Definition changed from: **Family Scale Farm** – “AJP has found that using “small” immediately presents many problems, and recently, more and more young farmers are not farming as families but as collectives of various kinds or are working on farms owned by a school or not-for-profit. In a recent discussion of this issue among the members of Call to Farms, Brian Snyder of PASA suggested that a more appropriate term would be “community-based” farms. Brian writes: “What I have found useful is to speak of “community-based farms” in that we almost universally are advocating for farms that are indeed centered in meeting needs in their communities, even if those “communities” are defined a little larger than just who you might see at the local coffee shop on Saturday morning. If we say family-scale, I can already hear some of my colleagues on the industrial side talking about how they indeed are family- scale . . . believe me, we don't gain much by using that language in CAFO-land, except more grief. Many of the farms we work with at PASA already fit the USDA definition of a “large” farm, which means grossing over \$500K, but they are all still community-based, or community-centered if that somehow works better.”

**New Definition of Family-Scale Farm:** AJP supports the overall framework put forward by La Via Campesina that defends family farming in terms of peasant-based ecological farming, as opposed to the “large-scale, industrial, toxic farming of agribusinesses, which expel peasants and small farmers and grab the world’s lands.” However, in the context of agriculture in the US, we believe that additional refinements are necessary to clarify which farms qualify for Food Justice Certification. The term ‘family farming’ is vast, and may include almost any agricultural model or method, and many farms in the US, even very small ones, take the legal structure of a corporation. Defining size by acreage and excluding “large” farms does not coincide with the reality in the US: for example, there are family-scale farms, where members of the family do most of the work with a minimum of hired help, that work over a thousand acres growing grains and beans. By contrast, there are corporate-controlled vegetable and fruit operations that farm a few hundred acres and hire hundreds of farm workers where the profits go to people who never work on the farm. In California, there are mid-sized organic farms that are good candidates for FJC where the farmer may own some land, but also rents land, hires employees who do a large portion of the work, and spends most of his / her time managing the farm, making the majority of the day-to-day, operational decisions, and all strategic management decisions. Increasingly in many parts of the country, it is not a traditional family, but a group of unrelated people who cooperate in running a farm either as a legal cooperative or a more informal Limited Liability Company or worker owned structure. For FJC, it is not the acreage but the management control and beneficiaries of the proceeds that are critical as well as the farm’s connection with the local economy. The farms AJP supports range in size by acreage and gross sales from smallholders to medium-sized farms. These farms are diverse in character and usually also diversified in what they produce, thus making important contributions to biodiversity. To borrow language from the Food and Agriculture Organization (FAO) of the



United Nations, these farms are embedded in “territorial networks and local cultures, and spend their incomes mostly within local and regional markets, generating many agricultural and non-agricultural jobs.” The income generated by these farms is not syphoned off to pay dividends to distant stockholders, but goes to the farmers themselves and to the people who work on the farms. The values of ecology, health, care and fairness as defined in the IFOAM Principles of Organic Agriculture take priority over profit. At the same time, to survive in the capitalist marketplace and to afford ecological practices, these farms must generate sufficient revenues from the sale of farm products to cover production costs including living wages for farmers and farm workers as well as funds to ensure the future of the farm.

**Adding definition for Transparency:** As a principle, managers and directors of businesses and organizations and board trustees have a duty to act visibly, predictably and understandably to promote participation and accountability. Transparency goes beyond simply making information available. Transparency is about honesty and choice and free access to knowledge, which implies that information flows all ways; information should be managed and published so that it is relevant and accessible as well as timely and accurate. Confidentiality should be incorporated to ensure the integrity of confidential matters. Information should be provided in comprehensible language and formats appropriate for different audiences and stakeholders and information should be presented with sufficient time and enough detail to permit analysis, evaluation and engagement. This means that information needs to be accessible while planning as well as during and after the implementation of policies and programs. Information should be up-to-date, accurate, and complete.

**Adding definition for Whistleblower:** A ‘whistleblower’ is a person who raises a genuine concern in good faith relating to the many types of reports that employees might make such as failure to comply with legal or professional obligations or regulatory requirements; dangers to health and safety; child protection and safety concerns; wage violations; hygiene and food safety issues; animal welfare; sexual harassment, physical abuse; criminal activity, environmental violations and financial mismanagement. This would also include complaints or allegations against a certified entity about potential Food Justice Certified Standards violations.

## **EXECUTIVE SUMMARY AND UNDERLYING ASSUMPTIONS**

**ALL NEW LANGUAGE SINCE OCTOBER 2015 HIGHLIGHTED IN YELLOW**



## **Executive Summary**

The Agricultural Justice Project bases these Standards for fair trade and social justice in the food system on the Declaration of Human Rights, the conventions of the International Labor Organization and the experience of farmers, farmworkers, and other participants in the current food system in the United States **and Canada.**

**The Agricultural Justice Project works to transform the existing agricultural system into one based on empowerment, justice and fairness for all who labor from farm to retail. Central to our mission are the principles that all humans deserve respect, the freedom to live with dignity and nurture community, and share responsibility for preserving the earth's resources for future generations.**

## **Farmer Rights**

The Standards outlining farmers' rights are based on the principle that all contracts between farmers and buyers will be fair and equitable. These Standards ensure the following:

- Good faith negotiations on any contract with a buyer, with payments to the farmer that cover the cost of production of the farm products plus a fair return on the farmer's investment and a living wage for the farmer. Should the buyer not be able to afford to pay an adequate price, full disclosure of financial records would be required, as well as steady improvement as finances improve.
- Freedom of association and the right to collective bargaining.
- Fair conflict resolution procedure.
- Contract specifications such as recapture of capital investment, anti-discrimination clauses, prohibition of the termination of contracts without just cause, and profit-sharing incentives (if offered).

## **Farmworker and Food System Worker Rights**

The Standards outlining workers' rights are based on the principle that all workers have the right to safe working conditions, just treatment, and fair compensation. These Standards ensure the following:

- Adherence to international laws protecting workers, including ILO Conventions and UN Charters.
- Freedom of association and right to collective bargaining.
- Fair conflict resolution procedure.
- Living wages.
- Safe and adequate housing (when provided).
- Health and safety protections, including access to adequate medical care and a "right to know" clause regarding use of potential



toxins, with the expectation that the least toxic alternative is always used. We believe that the application of pesticides and the use of hazardous materials should be done according to the instructions on

the label and according to the law and that training employees on the proper use and application of these products is required as part of an operation's health and safety program.

### **Buyer Rights**

The Standards outlining buyers' rights are based on the principle that all contracts between farmers and buyers will be fair and equitable. The Standards ensure the following:

- Fairly negotiated and equitable contracts with farmers.
- Buyers' right to transparency of farmers' costs of production for the purposes of determining fair prices.
- Fair conflict resolution procedure.
- Buyers' right to require up-to-date farmer certification of all applicable products.

### **Farm Intern / Apprentice Rights**

In recognition of the vital role that interns / apprentices have played in organic and sustainable agriculture and the commitment of many farmers to training the next generation, the Standards include a section devoted to interns. The Standards are based on the fact that interns are inherently distinct from wage laborers, and therefore have distinct rights and responsibilities. These Standards ensure the following:

- A clear, mutually agreed-upon, written contract laying out the expectations and assuring the intern / apprentice that the farmer will provide the desired instruction.
- A fair stipend to cover living expenses.
- All other rights accorded to farm employees.

### **Indigenous Rights**

Most of the world's farmers are indigenous peoples. An ecolabel that makes claims regarding social justice in agriculture needs to address their unique concerns. This section is under development as AJP actively seeks input from representatives of indigenous communities.



## **Incentives for Performance**

AJP's certification program builds in incentives for consistent good performance according to these Standards. Farms and businesses that are long-term clients, who regularly meet all Standards, consistently achieve continual improvement points, and have had no changes in their business or employment structure may be allowed a by-year in **inspection**. This practice is further explained in the AJP Policy Manual.

## **Background and Underlying Assumptions General Principles**

For the authors, as for many organic farmers around the world and the hundreds of organizations that have signed on to the IFOAM principles, social justice and social rights are integral aspects of organic agriculture, processing, distribution, and retailing. These principles of social justice are essential:

- a. To allow everyone involved in organic and sustainable production and processing a quality of life that meets their basic needs and allows an adequate return and satisfaction from their work, including a safe working environment.
- b. To progress toward an entire production, processing, and distribution chain that is both socially just and ecologically responsible. [4]

## **IFOAM's Principle of Fairness**

“Organic agriculture should build on relationships that ensure fairness with regard to the common environment and life opportunities. Fairness is characterized by equity, respect, justice and stewardship of the shared world, both among people and in their relations to other living beings.

This principle emphasizes that those involved in organic agriculture should conduct human relationships in a manner that ensures fairness at all levels and to all parties – farmers, workers, **processors**, distributors, traders and consumers. Organic agriculture should provide everyone involved with a good quality of life, and contribute to food sovereignty and reduction of poverty. It aims to produce a sufficient supply of good quality food and other products. This principle insists that animals should be provided with the conditions and opportunities of life that accord with their physiology, natural behavior and well-being.

Natural and environmental resources that are used for production and consumption should be managed in a way that is socially and ecologically just and should be held in trust for future generations. Fairness requires systems of production, distribution and trade that are open and equitable and account for real environmental and social costs.” (IFOAM Principles)

## **Underlying Assumptions**

These Standards are intended to guarantee just working and living conditions for all agricultural and food system workers, and just financial returns, equity, and fair working



conditions for family-scale farmers, their families, and other food business employers. All parties involved are encouraged and expected to voluntarily go beyond the minimum, whenever possible.

Consistent with the vision outlined later in this document, the goal is to build and maintain a mutually respectful and supportive relationship amongst the various parties in the food system (e.g., buyers, farmers, farm employees, cooperative employees, restaurant employees, and other food business owners and employees), rather than an antagonistic one.

We envision a symbiotic relationship, in which despite occasional differences and disputes, the farmer, farm employee, and other food business employees and managers, buyers of farm products, and citizens who purchase the final product are able to live full and rewarding lives. In this scenario, the farmer can count on a fair agreement / contract with at least minimum fair prices and a well-trained and consistent work force. The workers can count on stable, dignified work and just treatment. The buyer can rely on getting high quality food products.

Although these Standards are applicable to a range of scale operations they are primarily intended as a tool for small and medium scale family farms and independent or cooperative food businesses to help these groups add value and further differentiate their market share. The Standards include sections that can be used by all types of food businesses including cooperative stores, restaurants, processors or even certifiers.

These Standards have been field-tested through a number of years of pilot certifications on small and medium-sized farms and in food system businesses, coops, and organic certifiers in the U.S. It is recognized that the local, regional, national and / or international context of food production and distribution may require adjustments to these Standards in order to maintain the protection, integrity and quality of life of these stakeholders and there is a formal Standards revision process every five years.

These Standards are intended to be consistent with and to build on IFOAM principles on Social Justice, and the work of the Food and Agriculture Organization of the United Nations (FAO), the International Convention on Biodiversity, (CBD), and the International Labor Organization (ILO). [5] The Standards setting process is intended to be consistent with the ISEAL Code of Good Practice for Setting Social and Environmental Standards. [6]

A just workplace depends upon the equal involvement of employers and employees, directly or through democratically chosen representatives. All efforts will be made to include participation of organizations representing farm and other food system workers and farmers, rather than merely public and private agencies providing services to these groups. In the case of workers, such representatives could be from unions chosen by workers on the farms, plants or stores to be certified or other local worker organizations.



In the case of farmers, such representatives could be from associations chosen by farmers to be certified, or from other local farmer or indigenous people's organizations.

Participants in this program will be committed to continual improvement. For example, in relation to workers, employers under this program are committed to continual improvement in matters relating to employee wages, benefits, housing, and working conditions. In relation to farmers, buyers under this program are committed to continual improvement in matters relating to pricing of farm products, contracts, benefits and equity sharing, and all are committed to improving community relations. The farmer is committed continually to improve product quality, production efficiency, ecological balance, and environmental stewardship.

Employers under this program will agree to comply with all relevant federal, state, and local laws covering working conditions, health and safety, and terms of employment. Recognizing that laws protecting farmers, agricultural workers, and other food system workers are in general weak, and that enforcement is often lax, the lack of record of violations will not be considered a positive indication of the working or equity conditions.

We assume that buyers have rights that need to be protected, and we further assume that all the parties using the claim of fairness of these Standards need to be certified or engaged in some other form of third-party verification system. We intend these Standards to be used for a certification process as an additional label with organic certification. Farms that use organic practices but are not certified may also qualify. We also see a place for these Standards as a guide for family-scale farms that sell direct to local markets, do not have any employees and are not under market pressure to obtain organic certification. For these direct sales farms we offer a pledge that can serve as a step towards implementing these Standards as the farm grows and takes on employees. (Full Pledge process outlined in AJP Policy Manual.)

### **The Kinds of Farms that AJP Supports**

AJP wants to support farms that:

- Conserve resources and a clean environment
- Set fair pricing
- Provide conditions of respect, safety and living wages for the people who work on them
- Treat livestock humanely
- Are embedded in their local community and where the people doing the work have control over the resources necessary to farm successfully





These are all possible on a farm where one person or one family lives and works, or on a farm with one hundred hired employees, or on a cooperative farm with any number of cooperating partners.

## SECTION 1.0 – FOOD BUSINESS RESPONSIBILITIES TO FARMERS

Adding in pregnancy to all anti-discrimination clauses for all sections (**1.1.8. and 2.4 and 3.1.5. and 4.1.5. and 6.6.**)

**Changed all Community Relations Standards (1.6, 3.8, 4.8, 5.6 and 7.4)** from optional to required Standards after the Domestic Fair Trade Association (DFTA) evaluation of the AJP Standards found that AJP did not meet criteria regarding community relations for certified entities. Therefore we have changed this Standard from optional to required, ensuring that these groups will create mechanisms to engage with and support their local communities. **Old Language:** "AJP certified food businesses are encouraged to cooperate with neighbors and to invest in their community for more sustainable and just community relations." **New Language:** "FJC operations are required to invest in their community, in a manner of their choosing in an effort to achieve more sustainable and just community relations."

## SECTION 2.0 – FARMER RESPONSIBILITIES TO BUYERS

Move 2.8a *"If the buyer pays for and owns the AJP certificate of the farm, the farm is permitted to sell product that the certificate owner does not buy to other markets,"* because it is a repeat of 1.4.1c. Take away 1.4.1c and adjust lettering. This is a buyer responsibility to a farmer and has been moved to section 1.2.6.

## 3.0 FARMER RESPONSIBILITIES TO FARM EMPLOYEES AND INTERNS

Made change to use "Employer" versus "farmer" throughout Section 3.0.

**3.1.5b and 4.1.5b:** Replaced the phrase "not display favoritism" with "not discriminate" here and throughout the Standards.

**Whistleblower protection language added to Human Relations (Sections 3.0, 4.0, 5.0, 7.0 and 8.0) 3.16g:** "A farmer (for section 3.0), an employer (for section 4.0), a grower



group (for section 5.0) a non-profit Board (for section 7.0) and a labor contractor (for section 8.0) cannot retaliate against an employee who reports injuries, whistleblower concerns, or activities protected by the Occupational Safety and Health Act. [1] Whistleblower protections apply to many types of reports that employees might make such as failure to comply with legal or professional obligations or regulatory requirements; dangers to health and safety; child protection and safety concerns; wage violations; hygiene and food safety issues; animal welfare; sexual harassment, physical abuse; criminal activity, environmental violations and financial mismanagement. This would also include complaints or allegations against a certified entity that would become a noncompliance after the certifier does their due diligence in investigating the validity of the complaint(s). A 'whistleblower' is a person who raises a genuine concern in good faith relating to any of the above. Complaints may be filed with the Agricultural Justice Project and complaints relating to an employee's own personal circumstances, such as the way one has been treated at work, should refer to the certified entities official grievance policy and or procedures for conflict resolution.

\*\*\*Foot notes for [1] read: "Section 11(c) of the OSH Act prohibits employers from discriminating against employees for exercising their rights to file a complaint with OSHA, speak with an inspector, seek access to employer records of injuries or exposure to hazards, reporting an injury or raising safety and health complaint with the employer."

**3.3.1a and 4.3.1a on Living Wage** now reads: "Employees will receive a living wage, defined as the net wage earned during a country's legal maximum work week, but not more than 40 or 48 hours (depending on FLSA work classification), that provides for the necessities and allows a livelihood with human dignity. Living wage rates will be determined based on the needs of one individual. A living wage must cover at least resources for adequate nutrition, clothing and sanitary needs, health care, childcare, transportation, housing and utilities, plus savings (10 percent of income). The amount of a living wage will vary by region. The MIT living wage calculator uses information gathered from a wide variety of sources to generate regionally calculated living wages. More specific information on their sources can be found here: <http://livingwage.mit.edu/resources/Living-Wage-User-Guide-and-Technical-Notes-2015.pdf> and there may be regional or city specific surveys which can also be used to understand very local situations. [1] A living wage can be inclusive of non-monetary fringe benefits. Living wage calculations must not include hours worked beyond 40 or 48 hours, depending on job classification, which is considered voluntary overtime."

\*\*\*Footnote [1]: "While AJP recommends certain calculators, we do not mandate the use of a particular one and in determining whether an employer is paying a living wage, inspectors should take into account whether there are different calculations for the living wage in a given area." **Changed from previous language:** "Employees will receive a living wage, defined as the net wage earned during a country's legal maximum work week, but not more than 40 or 48 hours (depending on FLSA work classification),



that provides for the necessities and allows a livelihood with human dignity. Living wage rates will be determined based on the needs of one individual. A living wage must cover at least resources for adequate nutrition, clothing and sanitary needs, health care, childcare, transportation, housing and utilities, plus savings (10 percent of income). The amount of a living wage will vary by region. A living wage can be inclusive of non-monetary fringe benefits. Living wage calculations must not include hours worked beyond 40 or 48 depending on job classification, which is considered voluntary overtime.”

**3.3.3d** “Farmers / employers must offer a minimum of 1 hour paid sick time for every 30 hours worked unless more is required by state law.” **Changed from:** Farmers must offer a minimum of 5 paid days sick leave. Beyond this point, farms must have in place a policy for accrual of additional days.

**Removed language in 3.3.4i** “Employment must not be contingent on the employee accepting required overtime” and adjusted this to keep **3.3.4g**.

**Section 3.3.10c and 4.3.10c:** Added pre-paid debit cards: “Payment is made in legal tender (not in the form of *pre-paid debit cards*, promissory notes, vouchers or coupons).”

The word hazardous should replace synthetic in **3.4.2e** and elsewhere throughout the Standards. Also added in “or natural dangers.”

**Added 3.5.1m and 4.5.1j:** An employer cannot retaliate against a worker who reports injuries, safety concerns, or other activities protected by the Occupational Safety and Health Act or other concerns about wages, working conditions or food safety. Section 11(c) of the OSH Act prohibits employers from discriminating against employees for exercising their rights to file a complaint with OSHA, speak with an inspector, seek access to employer records of injuries or exposure to hazards, reporting an injury or raising safety and health complaint with the employer.

## **LEAST TOXIC ALTERNATIVE>>>Now PATHWAYS TO CERTIFICATION**

### **3.5.9. Pathways to Certification**

This section allows two pathways to certification: 1. Certified organic or biodynamic and 2. Crops are certified organic or biodynamic however livestock is not certified but producer is claiming to use organic or biodynamic methods.

- a. If farm is certified organic and or biodynamic, farmer shall provide organic or biodynamic certification certificate, plus a copy of the section of their organic plan where they list approved materials allowed in the certified organic operation in use.



### *Principle*

This section of the standards is to address the constraints found across the country for livestock farmers to access certified organic processors and / or slaughterhouses, and certified organic feed to comply with National Organic Program certification requirements of their livestock on certified organic or biodynamic farms. It is the responsibility of the farmer to uphold humane practices for livestock in addition to maintaining organic or biodynamic and sustainable practices on the farm.

### *Standards*

b. If livestock is not certified organic or biodynamic<sup>1</sup> (For those who are certified organic or biodynamic with crops however livestock is not certified) but claiming to use organic methods these constraints are limited to:

- Availability and / or cost of certified organic feed
- Availability of a local certified organic slaughterhouse within a reasonable and humane distance
- Feed
  - i. Verifiable as non-GMO
  - ii. Non-organic feed that has not been subjected to nanotechnology
  - iii. Or organic certified feed
- Humane Treatment
  - iv. Farmer will not use GMOs
  - v. Farmer will not use cloned animals
  - vi. Farmer will not use nanotechnology

## **SECTION 4.0 – FOOD BUSINESS RESPONSIBILITIES TO EMPLOYEES AND INTERNS**

**4.3.3d** Farmers must offer a minimum of 1 hour paid sick time for every 30 hours worked unless more is required by state law." **Old Language:** Employers must offer a minimum of

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<sup>1</sup> We will not expand the AJP scope to include other sustainability claims, but will seek partnerships with other high bar verification programs or other sustainability claims. For non-certified organic and biodynamic farms animal welfare is being reviewed on a case-by-case basis and organic farms are being verified with NOP standards. The AJP intent and vision is on the rights of the worker and this includes all aspects of the worker's life that would include the effects of slaughtering on the worker.



5 paid days sick leave.

**Removed language in 4.3.4i** “Employment must not be contingent on the employee accepting required overtime” and adjusted this to keep **4.3.4j**.

## **SECTION 5.0 – Grower Group Responsibilities**

**5.1.1a** Went from 15% in 2012 - 20% in 2015 and then it changed to 50%. **The Standard is now:** “Grower groups can apply as a group only if less than 50% of member farms in the entire group have hired workers and if the total number of employees on any given farm is less than 10, not including co-op administrative staff or other non-farm staff.”

**5.1.5c added new language** “GG members who do not sell into the FJC labeled product of the GG do not have to comply with AJP standards or be verified to be in compliance. These members are required to be in compliance and have an internal audit prior to selling ANY product into an FJC labeled GG product.” **Previous Language:** Grower group members will commit to comply with AJP standards (in writing), to providing grower group with information about farm operation that is required for internal monitoring and certification, and to participate in the grower group internal audit (including allowing worker representatives to interview workers on farms) and external certification audit.

**Added language: 5.1.5c i.** Internal audits and external inspections may occur simultaneously, provided the certifier retains control over the decision of which member farms to visit and inspect for the external inspection and retains the right to visit any farms the certifier inspector deems necessary even if the internal audit has already occurred or was not planned to occur simultaneously with the external inspection.”

**5.1.5d Old language:** “Grower group ICS will include annual check in with all member farmers regarding compliance with AJP Standards and regarding relationships with grower group representative negotiating on their behalf...” **New Language:** “Grower group ICS will include annual check in with all member farmers who are required to comply with the Standards regarding compliance with AJP Standards and regarding relationships with grower group representative negotiating on their behalf...”

**5.1.5.d.iv Comment:** We have received a suggestion to allow a break in annual inspections for internal audits in specific situations based on feedback that our verification process is burdensome and expensive. **AJP Response:** In the first public comment version of the proposed standards (Oct 2015) AJP had proposed standards to allow member farms with labor and a good record (specific criteria met) after several years to have a year without an internal audit. After consideration and comments from stakeholders AJP has shifted this proposed language to continue to require annual internal audits of member farms with



labor in certified grower groups, but is drafting a revised external inspection protocol that will allow the certifier to grant a year without external, on-site inspection if the grower group has met specific criteria in previous years of certification and this will be changing in the AJP Policy Manual. **Therefore we have deleted 5.1.5.d.iv** from the October 2015 Standards.

The language in **5.1.5f** has been changed from: “Internal non-compliances will be classified as major or minor based on a list developed by the ICS, using AJP criteria for major and minor non-compliances” to “Internal non-compliances will be classified as major or minor by the ICS based on a list developed by the ICS, using AJP criteria for major and minor non-compliances.”

**5.5.c:** Eliminated word “processed.” **Previous language:** “Grower group will only purchase a minimal percentage of ingredients from outside the member growers for use in processed grower group products.” **New language:** Grower group will only purchase a minimal percentage of ingredients from outside the member growers for use in grower group products.

## **7.0 – NON-PROFITS AND NONPROFIT COOPERATIVES**

**7.1a Currently Reads:** “Board members are selected based on a transparent and democratic process where a written policy of the organization is made available to staff.” **New Text Added:** Board nominations / positions are also open to the communities or stakeholders that the program claims to help.

## **ADDITIONAL AREAS FOR CONSIDERATION / AJP FOOD JUSTICE PLEDGE**

### **The AJP Food Justice Pledge and Collective Mark Program**

In addition to offering a third party certification based path to a domestic fair trade label, AJP will also be offering a low-cost pledge for use by community gardens and small-scale, direct sale farms that do not hire any labor whatsoever. As soon as a farm hires labor, the farm will have to become Food Justice Certified to continue with our program.

A **Glossary of Terms** has been added for Genetically Modified Organism (GMO), Materials Safety Data Sheet (MSDS), Nanotechnology and Cloned.