Ensuring Global Consistency and Local Applicability

Guidance on standard-setting as a strategy for improving the local relevance of sustainability standards

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This guidance has been developed by the ISEAL Secretariat, with input from ISEAL members, and through SECO-funded work looking at the linkages between sustainability standards at the local and international levels. For questions or comments, please contact Marcus Nyman – Senior Coordinator, Policy and Outreach (marcus@isealalliance.org)
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Introduction

The purpose of this document is to support those organisations developing or revising sustainability standards to bridge the gap between the international and the local levels and to ensure that their schemes are both substantively relevant to the local contexts in which they are applied and that they generate local buy-in and support. This is a non-normative guidance document, based around several aspects of the ISEAL Standard-Setting Code (see below), other ISEAL documents, such as the Credibility Principles and learnings from ISEAL and its members’ work engaged with standards on the ground.

4.2 Consistency between Standards

The standard-setting organisation seeks to avoid duplication and to be consistent with standards that have overlapping scopes, while not limiting innovation and improvement.

5.2 Stakeholder Identification

The standard-setting organisation has an understanding of who its stakeholders are.

6.3 Consistent Interpretation

The standard is consistently interpreted across its full geographic scope.

6.4 Local Applicability

The standard is relevant in the local contexts where it is applied, based in part on input from local stakeholders.

The contents do not form part of the compliance requirements for ISEAL membership and the document does not detail the information required to demonstrate compliance with specific clauses within ISEAL Codes. Instead, it is intended to inform and encourage good practice among sustainability standards practitioners, mutual learning and to help frame strategic decisions that standards organisations must take.

We are also interested in your experiences and knowledge of good practices and will use that input to revise and strengthen this document. Furthermore, we would be interested in hearing from organisations on how they would think to use the information contained here, and what documentation they would use to demonstrate that they had done so.

Why the issue matters

With sustainability standards playing an increasingly important role in global efforts towards sustainable development, they have come under increased scrutiny, particularly in relation to their accessibility for small producers, the engagement of emerging market stakeholders in standards development and governance, and for demonstrating improvement on the ground. Some stakeholders have started to question their relevance to the local contexts and may be spurred to look for alternative standards, alternative tools and policies, or to
develop their own schemes. One way in which scheme owners can allay these concerns is to include mechanisms for meaningfully taking into account local considerations and engaging local stakeholders.

Underlying these questions of local relevance is the importance of on-the-ground impact for sustainability standards – whether that means improved livelihoods, protection of biodiversity and ecosystems or respect for the rights of workers and communities. The two aspects raised here – ensuring the local relevance of standards and buy-in of local stakeholders – play crucial roles in bringing about impacts. If a standard is locally relevant, it means it is addressing the most important sustainability hotspots, it is not placing overly burdensome requirements on producers, it does not impose arbitrary or irrelevant requirements for the context, and it is set at an achievable level and calibrated to provide a pathway for improvement.

Aside from the standard itself, support from local stakeholders, including government, business and civil society is also important for a system to be able to deliver on impacts. This may be in the form of providing incentives for uptake of the standard or in reducing barriers. These can also be directly connected to the system itself – consumer campaigns, capacity building programmes, funding, research – or indirectly in terms of the enabling environment required for a standard to be successful – auditing infrastructure, market regulation, legal frameworks and enforcement. Depending on the context, local buy-in may be needed either for quickly reaching scale or simply for having a license to operate.

Using this guide

This guide is not an instruction manual for dealing with questions of local relevance – there is too much variance between geographies, sectors and history for such an approach to be effective. Instead, it provides an overview of the stages and practices in the standard-setting process that foster local applicability and buy-in, and how these considerations may need to be weighed up against other aspects of the system or the process. It is also intended to prompt reflection and internal discussion by scheme owners and stakeholders to consider existing practice and whether this can be improved. The document is broadly structured sequentially to reflect the standards-setting process. However, this is not exact and the order should not be taken literally – many of the suggested activities interlink with others and should not be considered in isolation. Much of content also reaches beyond what would be seen as purely ‘standard-setting’, to include long-term strategy and other aspects of the system.

Types of standards

Although standards systems evolve in myriad different ways, it is possible to characterise these initiatives to some extent based on their origins and development patterns. Understanding where your standards system fits in this development typology can be useful in considering whether some proposed strategies for improving local relevance are more applicable than others. There are also differences in terms of the stage of development of a system. As standards systems mature, the priorities, resources and scope of the systems also change and this may enable or render redundant certain activities or considerations.

Some of the more common models of standards development include:

- **‘The Umbrella Standard’** is a type of international standard that develops in one of two ways. Firstly, it may be that, faced with a proliferation of local standards and a certain level of confusion in the marketplace, efforts are made to develop a system that unites these. Alternatively, it may be that a standard is conceived and initiated at the international level as a framework through which local standards can be developed.
There are different methods through which local standards are ‘united’ together under these international structures and may depend on factors connected to the sector in which the standards are working. The international umbrella structures may also refer only to common criteria or more general principles, rather than detailed requirements and criteria.

• ‘The Localising Standard’ is a standard conceived and developed at the international level, with the aim of forming global consensus around the key issues in a sector. This may well be in response to specific social or environmental concerns and these are likely to reflect international markets and supply chains, with the standard offering a means of communicating good practice between actors in different places. While developed at the international level, such a standard still needs to be applied in context and the system then develops one of a variety of mechanisms for interpreting and applying the international requirements at the local level.

• ‘The Internationalising Standard’ is a standard which begins at a local level – whether it is provincial, national or regional – but, through its own success and development, increasingly expands to other geographical areas. This may happen on an incremental basis as more and more supply chain actors ask for its use by their partners. Such a model presents particular considerations in terms of ensuring its relevance in other locations.

• ‘Mutually Recognising Standards’ is where a standard is not developed at the international level at all but is predominately aimed at local production and markets. However, it may be active in a sector connected to international supply chains and therefore, for trade and market access, may look to cooperate with similar systems in other locations. There are different forms that such cooperation may take, which include, but are not limited to, formal mutual recognition.

• ‘The Roundtable/Industry Platform Standard’ refers to a type of standard that, in many ways, resembles the ‘localised standard’ discussed above. It warrants separate mention because of the nature of the approach and governance of the systems in question - they often aim to convene the whole of a particular industry around a standard and are often constituted by a significant number of supply chain actors. The concentrated geographical spread of commodity production in many sectors (for instance, sugar, soy and palm oil) means that this inherently includes strong representation from ‘local’ actors from specific countries and regions where the commodity production is focused.

This typology of standard types is not authoritative, nor is it intended that every standard falls into one of these categories. However, as a representative sample of different standards systems’ development trajectories, it provides a useful frame for the consideration of the good practices that follow. Each of these good practices may be more or less applicable to each of the models outlined above. For example, benchmarking might be particularly useful for umbrella standards and for mutually recognising standards. Similarly, an international standard that is localising will naturally seek to explore local consultation mechanisms.
1. Identifying Priority Areas

Rather than an afterthought, considering the local applicability of a standard at the very beginning of the standard-setting process can make it a more valuable resource. Factoring in such thinking early can also help the system adapt if and when it expands to beyond its original scope.

Questions to ask about the standard

What is the intended scope of the standard? Do you see this changing?

A standard may move to development for a variety of motivations. It is useful to reflect on where the intended scope of the standard lies and what factors could cause this to change. One way is that a standard grows successfully and scheme owners look to other geographies in which to expand or other stakeholders are asking for the standard to be used in other places. Similarly, standard owners may look to different product segments or end markets to increase the uptake of the standard. Economic or environmental conditions may also change, meaning adaptation is needed by those developing and managing a system. Thinking about this earlier and finding ways to build adaptability into the standard can be a useful approach.

How varied are the production conditions globally?

If the standard is aimed at a crop or commodity that is produced in varied climates and contexts, then different conditions locally may dictate what will make the standard relevant. These differences could be social, environmental, economic or political and may directly affect the production itself or the licence to operate in a country. Where production conditions are relatively homogenous, it may be possible to apply the same standard to multiple locations. If the production conditions are varied, an international scheme will need to be structured in order to account for these differences.

Is production concentrated in a few countries or spread geographically?

If production takes place in relatively few countries or production is concentrated in particular regions, that will dictate where some of the priorities for local engagement and relevance need to be established. If production is spread across many countries and regions, and that affects the markets you wish to influence, careful consideration should made in terms of where to allocate resources – not just time and money, but staff and expertise.

Which are the priority countries for production? In total volumes/in total values/in total trade figures/in sustainability issues faced/in demands for the standard?

Volume, value, trade, concerns and demand for a standard can all weigh into the considerations of where to apply resources. If the standard is in the first instance global in scope, priorities should rest on the relative impact of these considerations. For example, a standard could help bring sector transformation by focusing on key countries with significant power in a particular industry and pushing them to improve practices. A different approach could be to snowball uptake, beginning with smaller and more receptive economies and then building enough momentum to address the situation in larger and potentially more challenging geographies.

Which locations pose the most risks to the success of the standard (if excluded)?
When it comes to bringing change with limited resources, a risk-based approach is arguably the most effective and efficient. If there are crucial areas of production, the absence of which would challenge the legitimacy and effectiveness of the whole standard, then these areas need to be prioritised for engagement and ensuring the relevance of the standard on the ground. Such countries may present particular challenges, such as difficulties in local producers meeting the standard, or problems with corruption and auditing practice. Placing challenging countries at the centre of the strategy of a scheme can also bring potential risks.

2. Assessing the Local Standards Landscape

Once there is a clear idea of the priority areas for where the standard will need to be applied and supported, it is important to understand the existing standards landscape in those countries. In reality, this is not necessarily a sequential process and much of this work may already have been done or be underway. We divide these considerations into three areas:

i. Existing standards (or in development)

What standards are already active in areas in which your standard is intended to work?

If there are other standards active in the country and they cover the same products, they may act in competition to the uptake of your standard. This is not necessarily a negative, as competition between standards can also spur improvements in them. However, stakeholders may not understand the differences and may be concerned that the proliferation of standards is confusing. If standards are already active and have buy-in, it may be more difficult for a new scheme to create a foothold in the market.

Do they cover areas beyond your scope (e.g. productivity, food safety)?

Existing standards may not be in direct competition as such, if they cover issues which a new standard does not. If the issues other standards cover are not included in your approach, it is important to ask whether these issues are particularly relevant locally and whether they are key reasons stakeholders see the value of a scheme. Multiple standards, covering different areas can play complementary roles by covering the whole gamut of issues connected to production in a particular sector. Without raising awareness on these differences, such proliferation can still be of concern to local stakeholders but sometimes this complementarity can be jointly articulated through cooperation, benchmarking and/or alignment and recognition.

Do you cover areas beyond their scope?

If a new standard is offering additional value to local stakeholders, potentially covering issues or levels of performance beyond those already active in an area, it is important to make these additional benefits or differences clear.

Are these local standards or international standards?

The nature of the existing standards is important to understand. If they are explicitly local and have been fostered through the activities of local partners, it may be slightly harder to compete with these, no matter what the differences or additional benefits a new scheme offers. However, such local standards may have been developed specifically to cater for products heading for the domestic market and if segments of production are
internationalised and aimed at global markets, then there could be a specific role that an international standard can play. Again, this complementarity or uniqueness should be clearly articulated to local stakeholders.

**How successful or mature are these systems?**

It also matters how well developed existing standards are. To align or recognise standards which are also still in development may itself carry associated risks. Where there are already active standards, you can learn from their own processes of development in terms of success and failure and incorporate these learnings into the strategy of engagement for your own scheme.

### ii. The local standards infrastructure

**How do the national standardisation organisations function?**

National standardisation bodies are likely to be well developed locally, often covering standards that stretch far beyond sustainability (to also include technical and product quality standards). If they are state-managed or closely aligned with state actors, they may have strong existing buy-in from certain stakeholder groups. Understanding how these organisations functions, who the appropriate officials are and whether, as an independent voluntary standard you will need to work with the body is a very important step. It may be that an international voluntary standard can exist and function locally with no need to formally engage with local standardisation bodies but there may be certain rules, such as around accreditation and certification, which mean this is a necessity.

**Are they already actively looking at sustainability issues?**

In a number of countries official standardisation bodies are already active in standard-setting and certification of sustainable production. This may be in parallel to the growth of international sustainability standards and as a result of foresight and local leadership or in reaction to the apparent encroachment into their areas of expertise and authority. Engaging or aligning directly with such efforts can have positive mutual impacts in terms of official support, access to other key stakeholders, additional value that internationally recognised schemes can offer and the expertise that international schemes may have already garnered. A negative side could be the degree to which the national standardisation infrastructure is trusted locally and internationally, and the reputational risks of aligning with that.

**What assurance and accreditation mechanisms are in place?**

Assurance and accreditation may be the area where local political actors are most able to exert direct influence over international sustainability standards that wish to establish their systems locally. There may be formal recognition procedures, for example of certification bodies, which require local approval. There may also be other rules determining how certification activities can and should take place that need to be adhered to in order to operate.

**Are there specific standards laws or regulations that would affect how your system could function?**

These may be laws relating to standards systems i.e. standard-setting, accreditation, auditing, licensing, incorporation or branding and labelling, or connected to the substantive area in which the standard will be
active i.e. in connection to a particular crop, broader sectoral regulation over agriculture, forestry, extraction, fisheries, tourism and others, or in relation to other conditions such as trade or labour.

**Are there any problems with how the local infrastructure functions?**

If corruption or a lack of transparency is a problem in a local setting, then this can impinge on the effective local operations of an international system. This may also affect the image of the scheme globally if international stakeholders do not trust the veracity of local certification activities. If local standards infrastructure is not fully professionalised or if there are procedural or bureaucratic inefficiencies, this too can affect the ways in which international standards are able to do business. Some of these problems can be understood (and potentially addressed) by seeking to learn from international standards already active locally.

iii. **Attitudes towards international standards**

**How aware are local actors on sustainability issues and/or the role voluntary standards can play?**

The extent to which local stakeholders are already concerned or sensitised to the issues a proposed standard will address may affect their overall receptiveness. If the idea of voluntary standards, particularly internationally developed ones, is not already established, there may be some work required to educate local actors and organisations on the nature of the tool. Acting in conjunction with other schemes looking to establish themselves locally may be a useful strategy for sharing information, the burden of work and for presenting a coherent set of messages. Terminology may also matter and it is important to be sensitive to what key ideas mean when translated or applied to local contexts.

**Is there a culture of ‘standards making’ within the country? How receptive will local actors be to an international standard?**

Although in many countries and contexts, local stakeholders and publics will be supportive and receptive to internationally developed standards that push for improved sustainability performance, there are others where sentiment is strongly independent and there is an inherent inclination towards local standards or local versions of standards. This is not inherently negative but should inform the approach taken by international standards, the proponents of which see the need and relevance of internationally consistent norms being applied to local settings. In terms of strategy, there is a balance to be struck between the impacts that can be achieved through concerted effort to establish an international standard locally and those that can be derived from adapting to existing local standards.

### 3. Benchmarking/Alignment

If in your research you do find the existence of local standards systems, it will be important to consider whether and how you will engage with them. A first step is to better understand the extent of overlap between your systems and whether some form of recognition or alignment is an option.
i. Benchmarking and recognition of local standards systems

**What it is:**
Benchmarking is a comparison of one standard or benchmark against another to determine the extent of overlap and where the standard being compared exceeds or is lower than the benchmark standard.

Recognition is a process of deeming one standard partially or fully equivalent to another standard. Recognition can be unilateral or mutual, depending on whether the recognition goes both ways.

**Why it’s useful:**
Benchmarking a standard against those already available in a particular country or region can be a useful way to either demonstrate the compatibility of schemes or to differentiate a scheme and show the value and quality it adds.

Where a scheme owner is satisfied that a local or existing standard is suitably equivalent, mutual or one-way recognition can provide an easy route for producers to access certification, improve efficiency by avoiding duplication or the need for multiple audits.

This kind of bilateral cooperation may be useful where multiple standards have arisen in different contexts but pertain to the same issues and play a particular role in a given market. This can help foster local buy-in by reducing the burden on producers, recognising the validity of efforts made by local entities and opening markets in both directions.

**Considerations:**
There are well established good practices around how to carry out a benchmark and recognition exercise. Many of these are contained in the ISEAL Mutual Recognition Methodology paper developed by Proforest: [http://www.isealalliance.org/online-community/resources/mutual-recognition-methodology-proforest-and-iseal-working-paper-october-2012](http://www.isealalliance.org/online-community/resources/mutual-recognition-methodology-proforest-and-iseal-working-paper-october-2012)

Among the key decisions to be made:

- What is the end purpose of the exercise? This can range from understanding the extent of overlap in the standard to full mutual recognition of each other’s standards systems
- What is the scope of the benchmark? Does it cover just the content of the standard or also look at the systems that support implementation of the standard such as assurance models?
- For recognition, who will manage the relationship with the other standards system over time and what needs to be in place to ensure continued equivalence?

**Who needs to be involved:**
Benchmarking is a technical exercise but it takes place in the context of a political and strategic discussion. Recognition of another standard is both an opportunity and a risk for a standards system as it is essentially partially outsourcing management of its reputation. If the other standards system is not credible and the scheme accepts their results, its reputation may be tarnished. As such, it is important that decisions on
recognition are made at the highest levels of an organisation, while technical analysis for benchmarking can be undertaken by technical staff.

**Benchmarking Better Cotton**

Better Cotton Initiative (BCI) has taken a proactive approach to benchmarking activities, recognising the value that is brought by accurately comparing the standards and systems of other entities and initiatives. This value includes systems for recognition, the basis for partnership, improvements in schemes, reaching greater scale, reducing proliferation and the burden on producers, and building trust amongst various stakeholders, including local actors.

One key feature of the way BCI has gone about approaching benchmarking is that it factors into the broader growth strategy of the system. Cotton is a key commodity crop for a range of countries and the conditions in which it is grown are highly varied, both in practice and scale. Driven by a range of local and international factors, cotton is considered a national strategic commodity for many countries, including India, China, USA, Brazil and several West African nations. As such, national actors, interests and issues play a significant role in shaping and regulating the sector and it is therefore crucial that these be accounted for.

BCI has established a framework for how to conduct benchmarking processes, which in turn support the establishment of some of the strategic partnerships BCI has developed with other standards and initiatives in the cotton sector. The framework includes guidance for creating activity plans, for benchmark reports and for holding multi-stakeholder meetings. Having a consistent framework or methodology (albeit flexible to the situation) increases the efficiencies from a knowledge and resource perspective, meaning the process does not need to be reinvented each time a comparison is required. This is not least important because of the number of different programmes, initiatives and standards for cotton there are working internationally and at the local level. This consistency, coupled with transparency, improves the credibility and replicability of benchmarking, and means interested stakeholders, such as buyers, civil society organisations, other standards and producers, know what has gone into comparisons and what outcomes can be expected.

A problem often found when benchmarking is done by an external organisation is a lack of rigour or breadth involved in the assessment. However, by providing a clear framework, BCI has been able to set the terms on which assessments are done. As well as providing for a comparison of the substantive areas a standard covers, it also sets out the questions that need to be answered in terms of the approach to continuous improvement, methods of data collection, the business model employed, the systems provided for establishing traceability in the supply chain and the governance of the system. Where there are gaps in content or inadequacies in the systems for implementation, they can remedied or mitigated.

The benchmarking and partnership building process is undertaken by both of the organisations involved, is envisaged to take around 7 months and culminates in the signing of a partnership agreement. One component of this process is the gap analysis and technical benchmarking exercise, conducted by a suitably qualified third party organisation, separate from BCI and the other initiative in question. Depending on the extent of the challenges, there is also room for the benchmarking process to undergo some further multi-stakeholder review/consultation.
ii. Alignment with local standards

What it is:
Scheme owners can align their international standards with local standards without necessarily recognising their equivalence. This might also start with a benchmarking exercise to determine the extent of overlap and similarity. Alignment is about recognising where two standards are contributing toward the same sustainability outcomes but potentially at different levels of rigour or performance. This alignment of purpose opens the door to recognising one standards system as potentially contributing to the other by playing the role of an ‘entry level’ standard or a stepping stone.

Why it’s useful:
Where a local standard focuses on entry level requirements, or lays greater emphasis on a capacity building component, for example, alignment can help demonstrate a pathway of improvement to the higher bar standard (in terms of performance and system demands). This can help develop local buy-in by recognising local efforts, include a greater number of stakeholders within the system, and by defining a pathway for improvement (for both the certified enterprises and potentially also the local standards system).

Considerations:
A local standard is not synonymous with a lower performance bar. Local standards can exceed international standards in terms of rigour, in which case it may be more appropriate to look at recognition of the local standard than to see it as a stepping stone.

There are many different improvement tools or strategies to bring enterprises up to the performance level of a higher performing standard. The key challenge is to ensure that there is a suitable incentive structure in place to ensure that enterprises continue to improve from entry level practices to those that are more robust. In recognising a standard as a stepping stone, a standards system needs to consider what types of incentives can be put in place, e.g. increasingly strong claims, financial incentives from the supply chain, market access, etc.

Local standards often reflect the issues of importance to local stakeholders as well as the performance level of local enterprises. When considering the relevance of an international standard in a local context it is useful to see whether priorities align. If not, there may be reasons to revisit whether the international standard is equally applicable across different local contexts.

Who needs to be involved:
While the level of risk involved in developing a stepwise or similar relationship with a local standards system is less than a recognition agreement, it is still a formal relationship that requires a strategic decision and political buy-in from the highest levels of the scheme owner. Determining what that relationship looks like is partly a technical exercise but partly about reviewing the theory of change of the standards scheme – to what extent are entry level standards or stepping stones necessary to achieving the ambitions of the scheme owner?
4. Local Consultation | Local Versions/Standards/Criteria/Indicators

Alternatively, where no local standards exist, it will be important to implement practices that allow for a locally applicable version of your standard. There are two main approaches to doing this.

i. Local consultation on a global standard

What it is:
For standards that are seeking to be applicable across different regions of the world, it is now commonly accepted that local stakeholders need to be included in the consultation to ensure the standard reflects local ecological and social realities. One of the most effective ways to achieve this is to hold dedicated local, national or regional consultation workshops and events.

Why it’s useful:
Where a country has been identified as a priority for an international standard in development, local engagement and buy-in can be enhanced through targeted stakeholder outreach and inclusion in the
consultation process. This gives local actors the opportunity to learn about the intended form and function of the standard and for them to provide meaningful input to the development process.

Tailored information and events during a consultation can provide valuable input from affected stakeholders and, if sufficiently advertised, can be a powerful sign that local interests are being taken into account. While in-person events are not the only way to build local engagement, they provide a depth of input and buy-in that is not always achieved through less direct forms of engagement.

**Considerations:**

One of the challenges with local stakeholder consultation is the cost and time commitment. In developing a new standard, it is important that sufficient thought and planning is given to the budget and timeline required to conduct a meaningful global consultation. This does not mean that local consultations are needed everywhere and a scheme should consider which countries are strategically important for the roll-out or expansion of its standard.

Ensuring that events and information about the standard are provided in the local language of stakeholders is an important provision for accessibility and, in some contexts, there may be several local languages to manage.

It is important to be conscious of the local dynamics and implications of including particular stakeholder groups in a consultation, both to ensure participation by the key groups that are well-respected by other actors and to avoid participation by those stakeholders that don’t represent local stakeholders.

While a stakeholder mapping exercise is a prerequisite for embarking on a standards consultation, it may need further detail when it comes to holding an event or events in-country. At the very least, someone with local insight should be included in this exercise - someone who can draw on relevant stakeholders from across the sector, including civil society, government departments, trade associations and producers.

With such an exercise, it is also often useful to have a trusted local partner alongside, which can co-present the consultation. This may include a relevant ministry or industry association.

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**The Sustainable Agriculture Network (SAN) Standard**

The latest revision of the Sustainable Agriculture Standard, ongoing since 2012, has provided a valuable opportunity to refocus the Sustainable Agriculture Network (SAN)’s approach on ensuring positive environmental and livelihood impacts on the ground and the relevance of the standard in the varied contexts in which it is now applied. In its original form, the SAN standard was developed in 2004/05, and was aimed at the prevailing conditions of estates and plantations, mainly coffee and banana, in Latin America. However, after the standard was amended in 2010, it became clear that the geographies in which the system was seeing the largest growth – particularly tea in East Africa and cocoa in West Africa – were very different to the original context of the standard. With this in mind, and the fact that technical assistance could not cover all the gaps in the standard, it was clear that it needed to be re-written.

[Continued]
The significant growth of the SAN/Rainforest Alliance certification system – resulting from success in implementing the standard in the field and in generating demand in the marketplace - has meant an increase in the number of stakeholders with an interest in the standard. Therefore, the first round of consultation in the latest revision involved a large outreach effort, across all the major countries in which the system is active. It generated more than 10,000 comments from over 1,000 stakeholders in 50 countries, the majority of which (around two thirds) were gathered through in-person, local consultation.

At this point, actors in the SAN leadership and governance began to see the opportunity that the standard’s revision process presented for reasserting the fundamental goals of the system and for aligning its components to achieve these. With some issues unresolved through the first two rounds of consultation, and partly as a response to the challenge laid down by the ISEAL Impacts Code, the SAN Board of Directors issued the four priority impact areas that the standard should be addressing and additional standard attributes for ensuring the validity of the standard for all areas of application, including Africa, Asia and Latin America. This also entailed reshaping the SAN governance structures, such as the International Standards Committee (ISC), in order to include the perspective and practical experience, particularly for the African smallholder scenario.

In order to make the most of the third round of consultation, work was needed both to build the technical elements of the consultation and to develop detailed criteria. Rather than replicate the breadth of the first round, this meant drawing on expert groups for specific issues, such as High Conservation Value (HCV) areas with environmental NGOs and productivity with company representatives. Another crucial exercise at this point is also to undertake field trial audits, as a part of the standard-setting process. In SAN’s experience, it is only through simulating the conditions of an audit that can inform how standard impacts on the ground, the changes that it requires and the time it takes to assess compliance - and this information has to form a part of a strategy towards continuous improvement. The ability to bring in local stakeholders – whether producers, certification bodies or others – gave particular insight into the development of the standard, including the point that it involved too much paperwork, too much documentation and that management systems were too burdensome.

Ultimately, the changes that have been brought about through SAN’s standard revision have been more than a technical exercise of standard-setting and the process has helped frame and direct the strategy of the organisation. Among other things, this means having a final standard, along with mechanisms for implementing it, that are calibrated to deliver meaningful, local impacts in the most effective and efficient way possible.

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**ii. Development of local criteria and indicators**

**What it is:**

A common strategy for international sustainability standards to build local legitimacy and relevance is to develop the overarching principles and criteria at a global level and then provide mechanisms for specific criteria and indicators to be developed for national or local contexts. Within this strategy, there are multiple approaches. Initially, when a standard system starts operating in a new country or region, there might be
provisions for the certification body to develop the first local indicators, likely in consultation with local stakeholders.

Where the consultation on the global standard has already solicited engagement from local stakeholders, the standards system can further strengthen its relationship with these stakeholders by enlisting them to develop the local interpretation. This process can range in independence from the international standards system conducting the local interpretation process itself to the establishment of semi-autonomous national initiatives that are responsible for funding and implementing their own local standards interpretation. In the latter case, the international standards system will need to determine the level of control and approval process for the local interpretations to ensure a sufficient level of consistency between different local interpretations.

**Why it’s useful:**

Local indicator development can be the focus for consultation which, in turn, can generate interest, buy-in and relevance of the standard on the ground. Where an international standard requires the use of metrics for judging performance, these can be set for the local context through such a consultation. Similarly, practices and considerations that have specific local application can be introduced and included in such an approach, where this would otherwise be impossible at the international level.

This approach may be particularly effective for certain commodity products for which there is wide geographic distribution of production, meaning there is a lot of divergence in the conditions found.

**Considerations:**

There is a balance to be struck in this approach on the level of flexibility for setting criteria at the international level – if they are too prescriptive, they may restrict the introduction of certain specific local indicators or impose criteria with little meaning or significance at the local level. At best, this can result in extra administration, at worst it can result in inappropriate or irrelevant practices. On the other hand, global principles and criteria which do not go to a deep enough level of specificity, may struggle to provide international supply chain actors with the appropriate assurance that certified entities are performing to an equivalent and consistent degree. This is the best example of the challenges associated with achieving local applicability while maintaining global consistency.

When developing local criteria and indicators, it is generally good practice to follow a similar approach to the development of a standard and include an appropriate range of stakeholder interests in a consultation. The extent to which all relevant good practice at the international level is followed will depend somewhat on the resources available and the risks involved.

It is also important to have made clear through policy and guidance how the governance of local indicators and criteria connect to the organisation and standard at the international level, including in relation to other aspects of the standard system, such as assurance, traceability and claims.

**Who needs to be involved:**

When conducting a consultation around local criteria and indicators, it is essential to have staff or representatives in situ as without a local presence, the technical and practical sides of conducting a consultation would be very difficult. With a more focused and in-depth local consultation, particularly when considering criteria and indicators, there is greater potential for the inclusion of more difficult to access stakeholders, such
as small producers, women and indigenous groups. Similarly, developing partnerships with government agencies or industry associations requires further consideration to ensure that the process is not seen as overly controlled by one group. The inclusion of academics and researchers can help support these activities because they may be able to provide unique technical knowledge with regards to local indicators and conditions, and they may have good pre-existing relationships with potentially marginalised stakeholders.

5. Local Stakeholder Involvement

i. Stakeholder mapping

As with some of the other stages outlined here, stakeholder mapping is not necessarily a discrete activity that follows in sequence and is likely to occur from an early stage of the standard development process. Although it is a stipulated requirement for standard development and revision, it can also be an effective mechanism for assessing and thinking strategically about local progress. Monitoring and updating records of engagement with identified stakeholders can make outreach for more formal consultation easier and stakeholder mapping can support assessments of where additional outreach and consultation is required. There are various well-established methodologies and practices available for those undertaking stakeholder mapping.

Local stakeholder mapping helps organisations understand the interests and influence of individuals, organisations and groups and can inform broader strategy, at the national, regional or global level. Effective stakeholder mapping can support and be supported by existing local networks and knowledge and so, particularly for prioritised areas, it can be beneficial to bring local actors into the governance structures of the standard system or to use local consultants, representatives or staff to increase understanding of local stakeholder groups

ii. Establishing local offices and staff

Beyond the standard itself, there are a few ways that you can build a stronger local presence and empower local stakeholders to engage more actively in the running of your standards system.

What it is:

A number of recently emerging international sustainability standards have elected to base their head offices in producer countries and where markets for certified products may be developing, such as Latin America or South East Asia. Another approach taken by schemes is to set up local offices or employ local representatives in those countries that may be significant in terms of production or which may be seen as harder to fully include in the system.

Why it’s useful:

Situating a standards system in the global South can reinforce the perception that it is more engaged with the local contexts of certification and can counter one prevailing view of sustainability standards as being dominated by organisations in the global North. It can also mean that a scheme may be more readily able to react to trends and changes in the landscape and it makes outreach and engagement to key producer stakeholders easier. Similarly, setting up local offices provides a means to employ local experts with
understanding of the local context, who have established relationships and who speak the same language and understand local cultural norms.

**Considerations:**

A significant advantage of having local staff employed to represent the international organisation is that local stakeholders will have a clear first point of contact for making enquiries or raising concerns about the standard, rather than having to go directly through an international bureaucratic structure.

By contrast, it is not realistic to employ local staff everywhere the system hopes to operate. As with local consultations, there is a need to prioritise those countries where growth is most likely. As an interim step, finding local partners who can take on the responsibility for being a contact point in a country reduces the need for building local infrastructure too early in the uptake of the standard.

**Who needs to be involved:**

Understandably, for such an approach to function, there needs to be appropriately qualified personnel to fill the roles required of local staff. For a very new system, this may be a challenge if there has not previously been involvement from local stakeholders in the development of the scheme for the country in question. One way to deal with this is to look for individuals who have previous experience with similar schemes and to adapt this understanding to the standard and sector in question. Clearly defined relationships between local offices and international offices should be established.

**iii. Local stakeholders in governance structures**

**What it is:**

An alternative and less resource-intensive approach to both local consultations and local offices is to include local stakeholders in the overall governance structure of the standard system, making sure their views are reflected in the decision-making processes of the standard. This can involve defining the balance of interests in decision-making to include a geographical balance or nominating stakeholders who have expertise in different regions. Local stakeholders can be appointed to both technical committees and governance bodies. Alternatively, some schemes may opt to develop a system of ‘ambassadors’ without necessarily providing them with a formal role in the governance structures of the organisation.

**Why it’s useful:**

Those involved in governance structures will have more buy-in to the success of the system and can act as a useful bridge to local contexts, even if this is not their formal role within the system. They can also act as advocates in the absence of local representation and will likely hold important positions in the domestic context.

**Considerations:**

The size of both governance and technical bodies is limited and it is never possible to have adequate representation from all stakeholder interests in all geographies. The challenge in including geographically diverse representation is to ensure that those stakeholders have a good understanding of the local context and are connected well enough to be able to bring forward local input and act as effective ambassadors for building awareness of the standards system among their constituency.
In choosing local stakeholders to participate in coordinating bodies, it is also worth considering whether to appoint these stakeholders or whether there can be some form of election. This is more relevant for governance bodies than technical groups. There is an infrastructure required for holding elections and this assumes that there is an active local constituency that would participate in any election.

A variation on stakeholder engagement in governance bodies is to structure the standards system to be accountable to a membership. By having an open membership with formal voting structures, a standards system can ensure that stakeholders from different regions have a meaningful voice in decisions, even where their formal numbers may be lower than other stakeholder groups.

Who needs to be involved:

To ensure that local stakeholders who are representative of their constituency are either appointed or elected to governance bodies, it is important to have some understanding of the local landscape. Again, having a local partner who can build awareness of the standards system in situ is useful and will ensure that, in the first instance, stakeholders actively come forward to engage in the system. Once a standards system is more established in a country or region, it may be possible to proactively seek out key stakeholders who are representative of the local stakeholder views or issues.

Bonsucro Honorary Ambassadors

Bonsucro has seen a significant uptake of its standard during the past three or four years, with the majority of its certificate holders located in Brazil – the world’s largest sugarcane producer. Yet, the largest single number of Bonsucro members are actually from India, the world’s second largest producer. This fact perhaps reflects the different realities of sugarcane production in these two powerhouses as Brazil has already undergone widespread modernisation of its agro-industry, meaning larger, fewer farms, while Indian production is dispersed into smaller production units. In the case of India, it has also had a different history and relationship with international standards.

One innovative way in which Bonsucro has helped address the differentiated local conditions and context for its standard, is by introducing ‘Honorary Ambassadors’.

The Honorary Ambassador is a positive spokesperson who has the ability to promote Bonsucro and strengthen relationships with existing members, as well as influencing and reaching potential members. They must be knowledgeable about Bonsucro and be respected in their country of residence or origin. Their primary function is to spread the Bonsucro message to the market, raise awareness, act as advocates and encourage the uptake of membership and certification. Announced in 2014, the first Bonsucro Ambassador was from India, reflecting the particular needs of the local context.
6. Implications for other parts of a standard system

Standard-setting is clearly only one aspect of credible sustainability standards systems. In implementing a standards system, it is also useful to consider how local relevance and engagement manifests in other aspects of a standards system and what actions you will need to take to build local acceptance and uptake.

Assurance

There are number of different issues to consider here. First is the relationship between the standard and the assurance process. Adapting the standard to local contexts has both positive and negative implications for assurance. On the positive side, it means that the requirements in the standard are more likely to be relevant to the enterprises seeking certification. Auditors will find it easier to reconcile the requirements with what they are seeing on the ground. However, at a wider scale, the development of many local adaptations of a standard in different countries introduces the potential for differing interpretations of what is considered to be compliant practice. What is considered acceptable practice in one country may not be considered acceptable in another due to differences in the results of the local standard adaptation process. This is equally applicable where a standards system recognises a number of different existing local standards, each with their own variations on equivalence.

Given this potential for inconsistency, it is important for the scheme owner to assess whether the differences between multiple local adaptations or locally equivalent standards are significant deterrents to the achievement of the standards system’s objectives. If they are, then the scheme owner should take more direct responsibility for ensuring greater consistency between standards. This is a significant issue. Mature standards systems that have expanded globally have gone through successive waves of taking more and then less of a prescriptive approach to local interpretations, trying to find the right balance.

Another step that can be taken is to ensure that adequate guidance is provided to assurance bodies and auditors on how to apply local interpretations and on how to ensure that any interpretations during the audit are consistent with the intent of the requirements of the international standard.

A second issue to consider is the type of assurance model and its fitness for purpose. Third party independent certification, while often considered to be the most rigorous and impartial approach can also be perceived by local stakeholders as an external body imposing its arbitrary rules based on requirements that were set without their participation. The whole idea of an audit as a group of people flying in to check compliance and then flying out is inherently disempowering. However there are a number of ways to minimize this. The first approach is obviously to engage local stakeholders in local standards development or adaptation so they are already engaged in the standards system and can put the audit in context. Second is to consider alternative assurance models that are more engaging and participatory. For example, combining a third party independent assessment of a sample of enterprises with a more widespread self-assessment or peer evaluation engages the enterprises themselves in the audit process and similarly gives them more understanding of the standard and the audit process when the time comes for the third party audit.
As a third and final issue to consider, one of the principle constraints to global expansion of a standards system is the lack of local assurance or auditing capacity. It is often the case that when a standards system first moves into a new region or country, they don’t have local auditors who are trained in their system so their certification bodies are required to fly in international auditors at greater expense and with less of an understanding of the local context. Additionally, when a standards system is established in a country and is building local auditing capacity, it is likely at the outset that there will be relatively few enterprises seeking certification. By extension, this may not provide enough work to retain auditors, even on a part-time basis. A challenge to effective auditor competence is when an auditor does not participate frequently enough in audits for one standards system and

FSC’s International Generic Indicators

The FSC system is based around the development of Principles and Criteria (P&Cs) at the international level, through a credible, multi-stakeholder consultation process, which are then applied at the national level through the development of country or region specific standards. This includes the addition of indicators (as well as verifiers, norms and guidance) and in some instances, interpretation of the P&Cs, where required by national conditions. This process is undertaken by a delegated national Standards Development Group and then approved by FSC International. Where there is no formally recognised national standards development initiative, individual country standards can be developed through certification bodies.

Alongside the development and finalisation of the FSC Principles and Criteria Version 5, FSC has been working on a set of International Generic Indicators (IGIs) to aid the consistency with which the P&Cs are applied and assessed at the national level. On the one hand, performance indicators are a mechanism within the assurance system, for use by certification bodies conducting audits and assessments of compliance. However, in the sense that they add detail and relevance to the P&Cs of the standard, their development is also connected to standard-setting and as such, FSC has elaborated the IGIs with reference to the requirements of the ISEAL Standard-Setting Code, including two periods of stakeholder consultation and through a multi-stakeholder working group. As well as providing a basis from which to develop national indicators for national standards, the IGIs also constitute a framework through which to transfer existing FSC national standards to the latest P&Cs and a consistent template of indicators for countries with multiple national standards (i.e. types of forest or multiple regions). Whereas previously, areas without a dedicated national FSC standard in place would be assessed against certification body ‘adapted standards’, the IGIs will form the basis of the adaptation of interim national standards to national conditions.

In addition to improving the consistency of implementation and assessment of the standard, and ensuring the national relevance of the standard, the approach brings efficiencies to the system. Providing a standardised template of indicators supports the process at the national level and provides a route for quicker approval at the international level. Indicators play a pivotal role of linking the principles and criteria of a standard to the assurance system and to monitoring and evaluation systems. FSC’s approach recognises this importance and looks to ensure coherence of the different components of the FSC system, demonstrating how the relevance of a standard, the consistency of its implementation and the efficiency of the process can be balanced. Although the development of the IGIs has been done to accommodate particular aspects of the global FSC system, the approach can also inform that of other standards looking to build national structures and practices around international norms and criteria.

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therefore is less able to retain a robust enough understanding of the standard and how it is applied on the ground.

There are no easy answers to this dilemma. A fairly simple initial guideline though is to ensure as much as possible that the roll-out of the standards system to new countries is planned and methodical and that consideration is given in advance to issues like local assurance capacity. Beyond that, it is sometimes useful to look at other standards systems operating or planning to expand to the same region and engage them in a discussion about identification and sharing of local assurance resources. Where local assurance bodies do not exist, there may also be a need to build local capacity directly through capacity building activities, possibly of local NGOs, trade bodies or state entities.

**Operations**

Building local relevance and engagement has both positive and negative implications for the efficiency of a standards system’s operations. On the one hand, where there is local capacity to work with stakeholders and respond to questions regarding implementation of the standard there is an obvious efficiency and opportunity to build local awareness and buy-in. On the other hand, the need to manage offices, staff or contractors in different locations can greatly increase the challenges associated with both administration and ensuring consistency of message.

Looking at the positive implications, the main efficiencies to be gained can be categorised as contributing either to greater local buy-in and uptake or to greater local relevance and ease of implementation. Having a local presence in a region, through staff or contractors, helps put a face to the standards system and provides a local point of contact. Local offices can also be responsible for administering any local interpretations of the standard, can monitor development of other standards in the region, can respond to enquiries or complaints, and can build awareness and uptake of the standards system by local businesses. There is also an increasingly strong case to be made for local offices taking initiative to build local markets for the certified products or services.

At the same time, local staff or offices require both funding and oversight. It is likely that local offices will only be considered once a standards system has reached a certain level of growth in a country or region. An interim alternative is for the standards system to establish local working groups of stakeholder champions who are committed for various reasons to promoting the uptake of the standards system. Costs of local engagement ideally are reflected in the income received from the growth of the standards system in the region but, like most start-ups, this is a chicken and egg scenario that often requires investment up front to build returns.

**Supporting Strategies**

As the ultimate goal of a sustainability standard should be to achieve meaningful impacts on the ground, the degree of local applicability contained within a standard and the detail required needs to be assessed in relation to other strategies. This is primarily a question of understanding what are the range of constraints to the uptake of better practices in a given country or region, and what is the relative importance of each. In some cases, lack of relevance of the standard may be a key constraint, in which case investing in a local adaptation of the standard makes sense. However, in other cases, it is quite likely that the main constraint has to do with lack of local capacity to meet the requirements in the standard. In this case, finding mechanisms and funding to deliver capacity building might have a greater return on investment.
Two other constraints that often arise are lack of access to capital for enterprises that need to make investments to get certified, and a challenging and sometimes conflicting set of local laws and regulations, which may or may not be enforced. In both cases, it may be necessary to address these more structural considerations in the finance and regulatory infrastructure before seeing real growth in the uptake of the standard.

**Claims**

As noted above, there is significant potential to develop local markets for certified products and services. Some markets will be more amenable to certified goods than others but a local presence in country offers the potential to build awareness and resulting markets. With respect to claims, the key consideration is that the claims and labelling policy, likely developed initially for traditional Western markets, also needs to be locally applicable. Most obviously, this is about having a label and associated claims that resonate locally. If you anticipate that there could be a significant market for your standards system in a country or region it is even worth considering from the outset whether to have a name for your standards system that is regionally appropriate. This can include choosing a name that translates well into local languages or creating a new word that crosses languages, such as Bonsuco, which is the trading name for the Better Sugarcane Initiative. A secondary consideration is then to ensure that marketing materials are appropriate, whether for B2C or B2B transactions. Understanding the local culture and values will make it easier to determine what messages resonate best and how to convince local consumers and companies of the relevance and impact of your standards system.