Roundtable on Responsible Soya - The certifying smoke screen

22 May 2012

Responsible: “Based on or characterized by good judgment or sound thinking”
(The Free Dictionary Farlex)

Introduction
The Roundtable on Responsible Soya (RTRS) Annual Conference will be held at the Park Inn Hotel Heathrow on 23 and 24 May 2012.

The RTRS is a voluntary certification scheme established in May 2004 and formally launched in 2006 as the RTRS Association. Members include food and agribusiness giants including Cargill and Monsanto, and supermarkets like Sainsbury’s, but also some NGOs including the World Wide Fund for Nature (WWF). Negotiations on criteria were a cumbersome process that took some considerable time, and the actual certification of RTRS soya production commenced in 2011.

From the outset there has been strong opposition by social movements and environmental organisations both in Europe and in producing countries. In 2011 over 25,000 people sent messages to major European and UK retailers demanding a boycott of RTRS certified soya in favour of looking for real solutions. Nevertheless some European NGOs keep supporting the project.¹

In order to get the agribusiness multinationals in the soya supply chain to participate, the RTRS adopted a low-threshold approach. That led to ignoring the GM soya issue and weakening the requirements around deforestation and pesticide application. The resulting RTRS criteria fail to address the critical issue of GM Roundup Ready (RR) soya. They also allow deforestation of the Amazon and other valuable ecosystems like the Chaco and Cerrado, as long as the land is in an area “zoned” for agricultural use.

The EU livestock sector consumes around 500 million tonnes of animal feed every year, 75% of which is imported, mostly from South America. Europe is a major destination for soya and is dependent on imports of feedstock for unsustainable forms of intensive production of poultry and livestock.¹

The credibility of the RTRS process was significantly damaged by the resignation of two major Brazilian organisations in the soya supply chain. Aprosoja (representing 6,000 soya producers in Matto Grosso) in May 2009 and ABIOVEii (representing the Brazilian vegetable oil sector) in March

¹ These organisations are WWF International and the Dutch organisations Solidaridad, Stichting Natuur en Milieu, and BothEnds.
2010. So far certification only covers a very small part of the crop in four soya-producing countries – Brazil, Argentina, Paraguay and India.

The first audit reports have now been published on the RTRS website, covering ten soya companies in Brazil, Argentina and Paraguay, including soya mega-producers Blairo Maggi (Brazil) and Grupo Los Grobo (Argentina). This could have been the biggest opportunity for RTRS to prove its validity. After all, any certification scheme's credibility comes from its auditing processes. On the contrary the reports actually confirm much of what critics have been saying so far:

- RTRS certified soya does not provide any benefit in terms of “sustainability” or improvement in production methods.
- RTRS certification merely rubber stamps current practices of soya producers.
- There is no evidence that the existence of the RTRS has improved anything in relation to deforestation, pesticide use or impacts on neighbouring communities.
- GM RR soya production methods are regarded in the reports as climate-friendly and beneficial for soils and water conservation.

**How much soya is RTRS certified?**

At the time of writing a total of less than 0.5 million tonnes of soya production has been certified from 14 companies based in Brazil (5 companies), Argentina (5), Paraguay (1) and India (3). Table 1 shows the amounts certified per country and what percentage of overall soya production this represents. Globally around 260 million tonnes of soya beans were produced in 2010 (the latest data available). This means that only 0.164% of global soya production is certified by the RTRS. It is not clear how much of this was actually sold as RTRS soya along fully traceable supply chains. Most of this will have been sold via the “book and claim” system, meaning that the buyer only receives paper certificates, not actual “responsible” soya.

The bulk is produced by two of the largest soya producers/investors, Grupo Andre Maggi from Brazil (66,000 hectares) and Grupo Los Grobo from Argentina (20,000 hectares). Most soya certified is RR soya, with a minority conventional soya and no organic soya.

**Table 1 - RTRS certified soya production by country**

<table>
<thead>
<tr>
<th>Country</th>
<th>Amount of soya beans produced in 2010 (million tonnes)</th>
<th>Amount certified by RTRS in 2011 (tonnes)</th>
<th>Percentage certified by RTRS in 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brazil</td>
<td>75</td>
<td>255,866</td>
<td>0.34%</td>
</tr>
<tr>
<td>Argentina</td>
<td>55</td>
<td>150,688</td>
<td>0.27%</td>
</tr>
<tr>
<td>Paraguay</td>
<td>8</td>
<td>5,334</td>
<td>0.07%</td>
</tr>
<tr>
<td>India</td>
<td>10.6</td>
<td>16,876</td>
<td>0.16%</td>
</tr>
<tr>
<td>Global</td>
<td>260</td>
<td>428,764</td>
<td>0.16%</td>
</tr>
</tbody>
</table>

**The RTRS Public Audit Reports: No benefit for people or the environment**

The audit reports screened for this briefing are the public versions as published on the RTRS website. We requested the full reports from one of the auditing firms, Control Union, who refused, saying that the full reports are confidential between the auditor and its client.
It should be noted that none of the audit reports mention compliance to the additional criteria of the EU Renewable Energy Directive (RED), which would mean that none of the RTRS certified soya will be used to meet the strongly condemned EU 10% agrofuel target. The RTRS was among the first schemes to apply for and obtain accreditation from the European Commission to certify agrofuels for the EU market.

The public reports vary greatly in details provided, but in general the evidence given for compliance with the criteria is extremely flimsy or non-existent. Auditing company SGS provides considerable details for each criterion divided in sections “strengths”, “weaknesses” and a conclusion on whether the producer meets the criterion. Schutter Argentina does the same but with a lot less detail, while Control Union only provides a conclusion of one or two lines. Having certified the two biggest producers Grupo Los Grobo and Grupo Maggi, and therefore the bulk of “responsible” soya, Control Union provides extremely poor or no substantiation as to how criteria have been met, and does not mention a single element for improvement, which is hardly credible. In several cases the report's text is simply copy-pasted from others, not adding to their credibility.

The RTRS has adopted a so-called “progressive entry level that includes a continuous improvement approach” in order to have more producers qualify the first year. This means that for the first year a positive certification decision will be granted if a producer meets only 62% of the RTRS standard (the so-called “immediate compliance indicators” plus 20% of other short/mid-term compliance indicators), 86% for the second year and 100% by the third year. However as some reports conclude, no baseline exists for at least some soya producers, making it impossible to verify any “continuous improvement”. As a result many weaknesses are recorded by the auditors for some of the companies, some of them quite severe, notably regarding pesticide use.

Auditing of farms is based on an annual pre-announced visit and by follow-up emails and telephone conversations. For instance no direct evidence on pesticide usage is generated by testing the soya for presence of unapproved/banned pesticides. The prefixed visits enable producers to ensure that any evidence, for instance of usage of unapproved/banned pesticides, could be removed for the time of the visit.

In the end all 10 companies successfully passed the certification audit.

The following section focuses on three key aspects of RTRS principles and criteria for certification: relations with local communities, deforestation and use of pesticides.

_responsible Community Relations (Principle 3 in the RTRS Criteria)_

The community relations and communications reports provide little evidence of the means by which the soya producing companies were consulting and responding to the complaints and needs of the local people. It is not always clear how people interviewed for the audit process were selected, but in one case they were selected and “prepared” for the visit by an employee of the soya producer in question.

In various cases there is no evidence of a communication channel for dialogue with the communities and no complaint mechanism. In some cases where this is said to exist it is noted that there is no evidence that this has been communicated to the communities.

In some cases evidence of communication channels is said to be demonstrated by the fact that interviewees disposed of the telephone numbers of the managers. In several cases charitable
projects are described as proof of good relations with the communities. This typically includes donations to the local school or activities or support for school programs.

For instance Grupo Lucci (Viluco) participated in a dental care program teaching children how to pick their teeth, and Lucas Johannes Maria Aernoudts participated in a drug prevention program. At the same time the report indicates pesticides sprayed within 30 metres from peoples' homes, which is allowed under RTRS criteria. Soya companies donated eggs for a local festivity, some furniture for the school, or a fishing project for an indigenous community, or even the supply of soya beans to supplement school meals.

While local charity is not required by the RTRS criteria, it is something frequently seen in soya areas to appease the local population. Handing out small charitable donations is a common strategy found in soya areas to try and “deal” with small farmers. However in the context of widespread opposition from small farmers and indigenous peoples’ organisations throughout South America to soya monoculture expansion, the fact that none of the audit reports mentions any of these movements, and that no small farmer representatives have been interviewed based on clear and open invitations, certainly disqualifies the reliability of these reports.

There is therefore no clear evidence that local small farmers were consulted. In one instance Paraguayan soya producer CYTASA helped to provide contacts for the auditors to interview. Another report provided details of an attempt to meet local people at a fuel station (Aceitera General Deheza SA) but reports, "After waiting one hour no one was present." No information about how such meetings were advertised is provided.

**Soya expansion and deforestation (Principle 4 in the RTRS Criteria)**
The audit reports confirm that all soya plantations up for certification were existing plantations, and many of them were deforested between 2005 and 2009. These plantations would not have qualified under existing and stronger standards, such as ProTerra, which has a cut-off date of 2004.

One huge flaw confirmed by the reports is that of partial certification. Soya producers can simply select the plantations that will easily meet the criteria while continuing bad practices and deforestation elsewhere. For example Grupo Lucci (Viluco SA) put forward 13,000 hectares of soya fields in Tucaman (NW Argentina) but not the 36,000 hectares on eleven other sites, explicitly stating that these would not meet the RTRS criteria.

Only a few of the reports (eg, Grupo Andre Maggi and Grupo Lucci (Viluco SA)) mention any supporting evidence of their claims based on, for example, satellite images before and after May 2009 – the starting date for RTRS deforestation criteria.

**Pesticide use (Principle 5 in the RTRS Criteria)**
No pesticide reduction targets or plans exist for any of the audited soya producers. This criterion, according to one auditor, is not strictly required for the first year under the “progressive entry level” approach but falls under the 20% short/mid-term criteria that have to be met.Only two out of the ten audited soya producers have an integrated pest management program in place, something that is not strictly required either. All companies are said not to be using pesticides listed under the Stockholm and Rotterdam conventions, but evidence of administration and a look in the storage room during the visit is limited. In no cases were samples of soya taken for testing.
The audit reports provide very little evidence that could verify the claims that pesticide use is in accordance with local regulations, that only approved pesticides are used and that measures are in place to prevent pesticide spray drift. Spraying is permitted within 30 metres of inhabited areas. Even in favourable weather conditions it is impossible to prevent drift, and the audit reports do not provide evidence to show how or if this is achieved. Indeed in various cases (Alfredo Guerra, Lucas Johannes Maria Aernoudts, Siegfried EPP) there is no registration of the meteorological conditions during time of spraying, nor the names of staff who carry out the pesticide spraying.

Something that is immediately required by RTRS is proper storage, washing and disposing of pesticide containers. The audit report of soya producer Siegfrid EPP notes that not all necessary precautions in the pesticide storage room are taken. The report for CYTASA revealed that workers applying pesticides received no training, that proper equipment and protective clothing were lacking and that containers were not properly cleaned and stored.

In some cases it is mentioned as a positive that every pesticide application happens on the recommendation of someone with a professional title, without clarifying the role of this person (Alfredo Guerra), or simply on the recommendation of the production manager of the soya producer himself. This gives little reassurance that the least possible pesticides are used.

**GM RR soya qualified as beneficial for soil, water and climate**

Finally it is important to note that auditors regard the production method of Roundup Ready soya, “siembra directa” or direct sowing with low-tillage, as a positive practice, beneficial for water and soil conservation and for the climate. However this production system is highly damaging to soil and water systems because of soil compacting and destruction of water and soil life with Roundup and other pesticides (see below).

**Flaws in the RTRS**

Prior to the first RTRS audits taking place the standards agree were heavily criticised as either weak and likely to be ineffective or endorsing unsustainable and irresponsible practices. Below is a review some of the main criticisms of the RTRS standards.

**The expansion of soya monoculture in South America**

RTRS allows any land that has been cleared of forest or “native habitat” up until May 2009 to be certified for “responsible” soya production. This moves the start date five years forward from other standards, such as the 2004 limit set by the Basel Criteria for Responsible Soya Production. After 2009 “responsible” soya expansion can still happen if, “It is in line with an RTRS-approved map and system.”

Despite the RTRS intentions to protect habitats, the expansion of soya monocultures in South America has continued in Argentina, Brazil, Paraguay, Uruguay and Bolivia since 2009. The expansion has resulted in continuing habitat destruction of major biomes including the Atlantic Forest systems in Paraguay, Argentina, Uruguay and Brazil, the Chaco Forests of Argentina, Paraguay, Bolivia and Brazil and Chiquitano Forest of Bolivia. In Brazil legislation to weaken the current protection of the most biodiverse rainforests (which has greatly reduced the rate of forest clearance in recent years) has been agreed by politicians. Only President Dilma Rousseff can veto the most damaging clauses, which include extending land that can be cultivated closer to hilltops and river banks, which could increase soil erosion, and amnesties for previous illegal felling before July 2008 in return for replanting or preservation of other forests.
In addition soya expansion continues to take over farmland previously used for mixed farming and ranching in the vast expanse of the Pampas, which in Argentina alone covers 55 million hectares of land suitable for soya monocultures. Existing ranchers and mixed family farms are displaced by soya plantations sometimes resulting in them having to migrate to cities.

In Argentina the area under soya cultivation continues to expand from 16 million hectares in 2008/09 to around 18.6 million hectares in 2010/11, and in Brazil from around 21 million hectares to 24.2 million hectares in the same period. Production increases come from this overall expansion of the area under soya and productivity gains per hectare.

The RTRS standards state that after May 2009, “Expansion for soya cultivation has not taken place on land cleared of native habitat,” however under certain conditions exceptions apply if:

- “It is in line with an RTRS-approved map and system.”

Where no RTRS-approved map and system is available:

- “Any area already cleared for agriculture or pasture before May 2009 and used for agriculture or pasture within the past 12 years can be used for soya expansion, unless regenerated vegetation has reached the definition of native forest.
- “There is no expansion in native forests.
- “In areas that are not native forest, expansion into native habitat only occurs according to one of the following two options:

“Option 1. Official land-use maps such as ecological-economic zoning are used and expansion only occurs in areas designated for expansion by the zoning. If there are no official land use maps then maps produced by the government under the Convention on Biological Diversity (CBD) are used, and expansion only occurs outside priority areas for conservation shown on these maps.

“Option 2. An High Conservation Value Area (HCVA) assessment is undertaken prior to clearing and there is no conversion of High Conservation Value Areas.”

In other words there is scope for soya growers to move into forested land.

The Soya Strategic Gap Analysis published in July 2011, "To identify the key gaps and bottlenecks for production and supply of sustainable certified soya in Brazil and Argentina,” and based on questionnaires and interviews with producers and other stakeholders, found that protection of forest under RTRS was certainly not guaranteed. It identified, “A gap in compliance with some environmental requirements related to native vegetation.” In addition the results of its interviews revealed a number of worrying incidents and trends:

- “Among the interviewees in northern Argentina, there was a case of legal deforestation in native woodland after May 2009.
- “In the areas of agricultural frontier MAPITOBA (Maranhão, Piauí, Tocantins and West of Bahia) there was the opening of new areas (authorized deforestation) in the Brazilian cerrado after May 2009.
• “Interviews with NGO’s revealed that the expansion of soybeans and the increase of land costs have led farmers to seek other areas. Additionally, it has led to illegal deforestation and to the consequent advance of soybean crops over these areas.

• “Generally in Brazil, both in Mato Grosso and Paraná, farmers interviewed are not compliant with the proportion of Legal Reserve required by the current Forest Code. For small producers, Legal Reserve requirements are even harder to be met, because it represents a significant loss of productive area.

• “Producers in new agricultural frontiers are entrepreneurs and the new agricultural areas in the Brazilian cerrado are in compliance with Legal Reserve requirements of the current Forest Code. Controlled burning has been legally permitted -by the Brazilian Environmental Agency, IBAMA- for clearing new production areas.

• “High Conservation Value Areas: the indefiniteness of the maps of national High Conservation Value Areas (HCVA) by the RTRS can be a limiting factor for producer adhesion to this certification process. Because these maps are not yet defined and because they represent restrictions for the expansion of soya production, Mato Grosso producers do not accept these criteria. According to them, accepting HCVA in the RTRS criteria would be compromising to something without knowing for sure the consequences of doing so.”

The RTRS promises that the HCVA maps will be available by the end of 2012. However based on evidence of recent activities, the small areas of land covered by RTRS certification cannot guarantee the protection of these valuable habitats.

**Responsible GM RR Soya?**

The RTRS criteria permit the inclusion of GM soya. Since the RTRS was founded in May 2004 the agronomic, health and environmental impacts of the reliance on Monsanto’s GM RR soya in Argentina, Paraguay and Uruguay (where close to 100% of soya grown is RR) and in Brazil (where around 75% is GM) has become a lot clearer due to independent research and analysis.

RR soya depends on glyphosate (Roundup) almost exclusively for weed control. Monsanto promised farmers cheaper and simpler weed control, which would make zero tillage easier to follow. Consequently glyphosate use rose very quickly, for example eight fold in Argentina between 1996 and 2006, as soya plantations expanded.

Initially RR soya did allow for cheaper and better weed control for soya farmers, but within a few growing seasons overuse of glyphosate lead to weeds developing resistance. In particular Johnsongrass (Sorghum halepense) and Grammila mans (Cynodon hirsutus) have developed glyphosate resistance causing a major problem for some growers in the heart of Argentine soya belt near Cordoba. Twenty-one other weeds in Argentina are listed as, “Just barely controlled by glyphosate,” or, “Might be the next to upgrade to full resistance by another evolutionary step.” In Brazil four weed species with glyphosate resistance have been found in soya fields.

Glyphosate resistance is even more advanced in the US in RR soya, maize and cotton where millions of hectares are infested with weeds Roundup cannot control. The solution proposed by Monsanto and other biotech companies is to apply more herbicides in mixtures or in rotation to ensure resistant weeds are killed. Weedkillers such as 2,4-D, dicamba and glufosinate ammonium are all lined up to deal with the weeds resistant to glyphosate in the US, and the same can be expected in South America. Such increased chemical use shows how the RTRS standards will endorse an escalation of the pesticide arms race in soya monocultures and will do nothing to reduce pesticide dependency on soya estates.
Glyphosate is also increasingly being linked to damage to the soil and enhancement of soil-borne plant diseases.\textsuperscript{xviii}

**Irresponsible exposure to glyphosate**
Exposure of people and wildlife to glyphosate also increased following the introduction of RR soya. In the Argentine state of Chaco birth defects increased four-fold over nine years in areas sprayed intensively with glyphosate.\textsuperscript{xix} Laboratory trials have shown that the toxicity of RR is greater than glyphosate alone because it is mixed with other chemicals that allow the herbicide to penetrate into cells more easily and that glyphosate disrupts endocrine systems.\textsuperscript{xx} The risk of exposure is made worse by the use of aerial spraying and inadequate buffer zones around dwellings. The death of an eleven-year-old boy in Paraguay in 2003 followed an incident in which he was engulfed in a glyphosate spray from a tractor, but no legal action has been taken against the farmer involved or Monsanto.\textsuperscript{xxi}

In the US research mimicking natural habitats found that, "Roundup induced morphological changes in the tadpoles."\textsuperscript{xii} Research on the indirect effect of glyphosate on non-target biodiversity has not been carried out on soya, but on other crops it has been found to reduce the availability of weeds and weed seeds, which are the base of the food chain and therefore species dependent on them will decline.\textsuperscript{xxiii}

The volume of independent evidence showing the toxicity of glyphosate suggests that classing RR soya as “responsible” can no longer be justified.

**Benefits for workers**
RTRS promises improved pay and working conditions. In Argentina most of the labour force is outsourced including planting, harvesting, spraying and transportation. Data on working conditions and pay are simply not collected by potential RTRS farmers.\textsuperscript{xxiv}

Rules on working hours on soya farms were weakened in 2010 meaning employees can now be asked to work up to 60 hours per week in “exceptional” periods, such a harvesting, for unspecified periods of time. Previously this was limited to just two busy period in the crop cycle.\textsuperscript{xxv}

**Human rights abuses continue**
Examples of slave-like conditions in agriculture still occur. For example in January 2012 it was alleged that RTRS member Monsanto was using a contractor in Argentina that forced workers to detassle corn for 14 hours per day and withheld their wages.\textsuperscript{xxvi} The Dutch seed company Nidera, another RTRS member, was also accused of keeping seasonal working in appalling conditions akin to a “concentration camp”. Seven executives of the company were arrested and Nidera was fined €125,000.\textsuperscript{xxvii}

A recent FAO report\textsuperscript{xxviii} confirmed the widespread nature of land grabbing in Latin America. The report identified four types of land grabbers: International, [Trans]Latina, Domestic/national, and “Undetermined” (ie, financed from tax havens). The report confirms that soya plantation expansion is an important factor in driving the acquisition of new land. It highlighted Argentina and Brazil as countries where foreign land grabbing was prevalent. It confirmed that, “Dispossession by displacement of the rural poor,” did occur but that, “Land deals resulted in the incorporation – adversely or otherwise – of smallholder and farm workers into the emerging commercial farm and plantations enclaves."\textsuperscript{xxix}
The Institute for International Trade Negotiations report highlights the problems small and family farmers have in establishing their rights to land, making it far more difficult for them to opposed land grabs:

“A large number of producers have property deeds and lease contracts, the minority, however, are pending regularization. Family farmer: some struggle with agrarian regularization due to verbal lease agreements and/or legal processes related to property division and issues with inheritance/inventories.”

Land grabs and their consequences are often violent and can lead to deaths when private militias shoot protesters. In November 2011 Cristian Ferreyra, a member of a Peasant Farmer’s Organisation, was shot and killed, and another person injured, during a land dispute for soya expansion in the province of Santiago del Estero in Argentina.

RTRS special agrofuel certification
In the EU the RTRS has lobbied hard to gain accreditation for “responsible” soya production for agrofuels, under the EU Renewable Energy Directive (RED). This directive sets a binding target of 10% of transport energy to come from agrofuels by 2020. The target has come under severe and increasing criticism as evidence has grown that agrofuels lead to monoculture expansion, land grabbing and higher food prices but do not actually reduce greenhouse gas emissions.

Conclusions
The first audit reports published by the RTRS show not a single benefit of RTRS certified soy production for the environment, local communities or consumers. There has been no impact on constraining the rate of deforestation, no reduction in pesticide use, and no benefits for small-scale farmers in the areas accredited.

Only two thirds of the very weak RTRS criteria have to be met for soya produced and certified this year. The public audit reports do not provide much real evidence that even those criteria are met. For instance auditors only check on pre-scheduled visits, and samples of “responsible” soy are not tested for illegal pesticide use. It is not clear how third-party stakeholders are selected for interviews, and all those interviewed have nothing but positive things to say about the soy producers. Partial certification enables soy producers to just certify those plantations that already meet the criteria, while being able to continue bad practices and deforestation elsewhere.

RTRS criteria themselves have been strongly criticised for their ineffectiveness in the face of ever-expanding soy fields. The acceptance of GM RR soya within the criteria means that consumers are being asked to accept a production model based on unsustainable weed control methods using herbicides increasingly linked to a number of human health effects and harm to wildlife and soils.

In the long term European reliance of soya imports for feeding livestock and poultry are unsustainable because of continued pressure on globally important forest biomes in South America and bad agricultural practices, allied to the competing demands from the domestic market in South America and China.

RTRS certified soya is a highly misleading and flawed product that will most likely be rejected by consumers. The long-term solution is not the smoke screen provided by the RTRS or other forms of soya certification, but a change in direction away from highly intensive poultry and livestock production toward production which is integrated into an agroecological approach to farming and consumption.
Referencias


ii ABIOVE, 31 March 2010. *Resignation letter to Mr. Jeroun Douglas, President Round Table on Responsible Soy*


v 2012 RTRS Public Audit Reports. *Op cit*

vi *Ibid*


viii Friends of the Earth, 2008. *Op cit*

ix BBC News, 26 April 2012. “Brazil’s Congress approves controversial forest law”


xi *Ibid*


xvi Heap I, 14 May 2012. *Op cit*


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xxii Friends of the Earth, 22 February 2012. “Paraguay's soy harvests a new set of victims”


xxvi RTRS Association, 10 June 2010. *Op cit*

xxvii Bloomberg Businessweek, 16 January 2012. “Argentina says Monsanto contractor abuses works.” *The Associated Press*


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