### TOPICS

#### FEEDBACK

- Some elements of the standard are seen from the perspective of food safety.
- Presence of not applicable food safety topics.

#### RESPONSE

- Adjustment of the requirements to the perspective of flowers and ornamentals
- Deletion of not applicable and some applicable principles related to food safety

#### Leaner structure and wording

- There are too many control points.
- In a three-module structure, one topic can be found in two modules.

#### RESPONSE

- Reduction in 43 principles
- Standard for flowers and ornamentals structured in the flow of the production process
- Unification of management topics in one section
- Simplification through merging principles in topics “Storage” and “Application of fertilizers and plant protection products”.

- Wording in control points is repeated in criteria.
- Outcome-based wording for the principles
- Avoidance of repetition in criteria

- Too many documents are required as evidence.
- Evidence increasingly based on visual inspection and contact with growers

#### Environmental indicators/metrics

- Alignment with FSI is expected in the standard. What about smallholders? How will data be shared? What is the purpose? Will it be part of IFA or an add-on?

#### RESPONSE

- Data policy (not to be included in IFA) suggested by public consultation and the Flowers and Ornamentals Focus Group
- Development of a data policy by GLOBALG.A.P. Secretariat/Advisory Board
- IDA add-on/module for flowers and ornamentals (FO) launch in Nov. 2020
- Continuing development of guidelines for IDA FO metrics to clarify the issues raised

#### Environment

- The standard needs to be updated (strengthened) in terms of environment principles.

#### RESPONSE

- Strengthening/Introduction of numerous topics, including: Waste, energy, biodiversity, water, integrated pest management, peat

#### Plant protection products (PPPs)

- There were concerns about PPP residues in final products. How can these be addressed in the standard?
  - Through a negative PPP list?
  - By requiring producers to do testing?
  - By introducing maximum residue limits (MRLs) for PPPs in flowers and ornamentals?

#### RESPONSE

- Highlighting customer requirements
- Strengthening IPM
- Identified limitations:
  - Lack of scientific definition of MRL for flowers and ornamentals
  - Differing markets requirements: Relevant as customer requirements

- PPP authorization per crop is a challenge for flowers and ornamentals. A diverse group of stakeholders expects flexibility.

- Records of all PPP applications need to be traceable.

#### RESPONSE

- Exploration of an initial set of options for flexibilization – topic still unresolved
- Potential approach: Focusing on key flower producing countries and working with their legal framework

- Integrated pest management IPM)

- IPM knowledge retention at farm level is key.
- IPM addresses root cause of PPP residues.

#### RESPONSE

- Simplification of newly proposed requirements through feedback from producers both of fruit and vegetables as well as flowers and ornamentals; guidelines to be developed

#### Water

- Opportunity to collect rainwater from roofs of greenhouses and store it cannot be enforced equally across countries.

#### RESPONSE

- More precise wording due to input from the Flowers and Ornamentals Focus Group and Environmental Sustainability Focus Group; water collection now enforceable in regions where it is feasible
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<th>Topic</th>
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| Soil, plant nutrition, and fertilizers | • Peat extraction releases greenhouse gasses (GHGs) and affects biodiversity.  
• Consumers and stakeholders want to see less use of peat.  
• Improper storage of fertilizers may have significant impact: Pollution, eutrophication, and economic loss.  
• Stakeholders want the IFA standard for flowers and ornamentals to allow the use of treated sewage sludge (biosolids).  
• Consensus on new, feasible requirement by involving retailers and producers in dialogue through the Flowers and Ornamentals Focus Group and NTWG  
• Discussion and subsequent adoption of proposals for safer fertilizer storage conditions; wording adjusted according to input from Flowers and Ornamentals Focus Group  
• Unclear risk due to internationally varying parameters and law enforcement; use currently excluded due to time limitations and complexity |
| Plant propagation material (PPM) | • Stronger protection of PPM intellectual property rights is desirable.  
• Control point on conversion period is unclear, affecting tulip bulbs.  
• Flowers and Ornamentals Focus Group recommendation to raise requirement level  
• Wording (including for tulip bulbs) clarified through inputs from Flowers and Ornamentals Focus Group, NTWGs, and CBs |
| Energy | • Proposals are made to update energy requirements in relation to climate change. Obstacles are identified.  
• Greater degree of flexibility (primarily for smallholders) introduced through proposals from Flowers and Ornamentals Focus Group/Environmental Sustainability Focus Group |
| Waste | • Plastics need to be addressed.  
• Wastewater disposal is partially covered.  
• Flowers and Ornamentals Focus Group/Environmental Sustainability Focus Group/public consultation agreement with proposed remedial changes, including a focus on a functional management system (instead of a documented plan) also covering plastics |
| Biodiversity | • Biodiversity is relevant for stakeholders. How relevant is it for flowers and ornamentals (greenhouses)? It is a challenge to make biodiversity requirements auditable and clear, especially regarding land conversion, unproductive sites, and invasive alien species. Clear terminology is requested.  
• Discussion of initial proposals with the Flowers and Ornamentals Focus Group; introduction of new elements from Environmental Sustainability Focus Group with discussion within the Flowers and Ornamentals Focus Group and subsequent adaptation to flowers and ornamentals based on sector-specific stakeholder feedback; introduction of new principles |
| Workers’ health and safety | • Principles on the risks to workers handling PPP seem too relaxed. Costs need to be considered.  
• Flowers and Ornamentals Focus Group recommendation to strengthen the requirements |
| Traceability | • Traceability without segregation could support the market for flower bouquets. Integrity could be lost when allowing the physical mix of products from certified and non-certified production processes.  
• Discussions at Flowers and Ornamentals Focus Group/public consultations: Mixed feedback; in spite of stakeholder interest, more time required for addressing integrity issues through development of a strong mass balance system and clear rules on claims |

**Note: If you would like further details on the feedback received during the public consultation process, please contact GLOBALG.A.P. at publiccomments@globalgap.org.**