

DAIRY SUSTAINABILITY FRAMEWORK RESPONSE TO PUBLIC COMMENTS FOR THE 2017 HIGH LEVEL INDICATORS

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Dairy Sustainability Framework

OVERVIEW OF REVIEW PROCESS

The Dairy Sustainability Framework (DSF), launched in October 2013, was established to demonstrate the dairy sector globally considers sustainability seriously. DSF members understand that dairy utilizes resources, both natural and human, and wants to continually improve its performance both by reducing negative impacts and increasing positive outcomes. The dairy sector appreciates that most negative impacts of the dairy product often occur at farm level. Part of the challenge with operating in this biological (farming) system is that any changes implemented cannot have immediate results. As such the sector has agreed to focus on a continuous improvement model using the DSF Framework.

The DSF Framework approach allows the sector to accommodate the diversity of global dairy production and processing, enabling members to initiate continuous improvement programs that are appropriate for their stage of sustainability development. It does not matter what stage members are at on their journey. The indicators that the DSF is developing accommodate this diversity of value chains and varying stages of development.

The Dairy Sustainability Framework began developing high level indicators for eleven high level global Sustainability criteria (see <https://dairysustainabilityframework.org/dsf-membership/global-criteria/>). These indicators will enable the sector to quantify the aggregate global progress across the 11 criteria. Two of the eleven Global Criteria indicators were developed in 2016, and four will be developed in 2018. The five high level indicators included in the 2017 indicator development were:

- Soil – Quality and Retention
- Soil Nutrients
- Biodiversity
- Water Availability and Quality
- Working Conditions

These 11 criteria enable the DSF to align the sector and publicly report global progress of the dairy industry across a range of sustainability landscapes. The DSF implemented an internal and external consultancy following the schedule of activities listed in Table 1. The general public was invited to provide comments on the draft 2017 high-level indicators from March 12 through April 30. Comments were received through a web-based survey platform (<https://www.dsfglobalcriteria.org/>), via email to DSF, and by paper submission. This report provides a summary of public comments received and DSF’s response to those comments.

19 February - 9 March	2017 Reporting guidelines available to members for final comments.
12 March – 30 April	External stakeholder consultation on reporting guidelines.
30 April – 5 May	Develop response to comments from external consultation document.
5 May - 22 May	Circulate response to comments document to members for feedback.
22 May - 25 May	Finalize response to comments document and indicator report.
28 May - 22 June	Survey member companies that have prioritized 5 2017 criteria to establish baselines
25 June - 1 August	Analyze data received from members through survey and establish baseline figures for the five indicators. Baselines established by 31st of August.

RESPONSES TO PUBLIC COMMENT

DSF received a number of comments across each indicator from a range of stakeholders, including public, private, non-governmental organizations, and dairy producer organizations. Comments were aggregated and anonymized to protect the integrity of the review process. The DSF has responded to each comment, and where appropriate and indicated, modified the indicators as described (Table 2).

It is worth restating that the DSF is a continuous improvement framework. These indicators and their implementation strategies are subject to review and revision on a continuous basis. In addition, the commitment of DSF members is to achieve the strategic intents of each of the 11 Global Criteria. The strategic intents are effectively the aspirational goals of each criteria. If the implementation of an indicator is not demonstrating improvement towards the strategic intent of each global criteria, the indicator will be reviewed and potentially revised. This commitment to continuous improvement provides DSF with the procedural latitude to explore and experiment with indicators to find the most effective balance between proscriptive actions and narrative guidelines. In the end, the success of this endeavor will be assessed by the progress made by global dairy in improving each global criteria.

Table 2: Response to Public Comments for five DSF 2017 High Level Indicators

Indicator	Public Comment	DSF Response to Comment
General Comment	<p>Could you include a revision date in the footer of the criteria guidelines?</p>	<p>We have added a revision date to align with agreement from membership, Advisory Council, and Governors.</p>
General Comment	<p>We would like to advocate for the new approach, rewording the criteria for each indicator as “Each participating member organization that has prioritized this criterion will define...” This approach empowers reporting regions to use locally-relevant programs per DSF intent. My feedback, to enhance the credibility of this approach, is that prioritized metrics require reporting regions to transparently disclose how they define their approach and the process through which they developed their approach.</p> <p>Further, we maintain it will be impossible to be global prescriptive for farm-level practices and expect any level of accuracy, and likely willingness, for aggregate global reporting. Rather (and per the intent of the DSF) reporting regions should be provided autonomy and recognition to map regional/national progress into the DSF.</p>	<p>This is exactly along the lines (and possibly further) of what the DSF is proposing with the development of these high-level indicators. We will consider the existing wording to see if further clarity can be achieved.</p> <p>This is the approach we are taking and is the reason why we are transparently explicit that these are high level indicators only.</p>
General Comment	<p>It would be helpful to show the user examples of plans for the individual criteria. Currently we only see examples for the NMP and Farm/Facility Safety Plan. The links for DairySAT (referenced in the Soil Nutrients, Soil Quality, and Biodiversity criteria) and the Australian Dairy Biodiversity Action Plan (referenced in the Biodiversity criterion) are less helpful because a login or registration is required to obtain further information.</p>	<p>We agree that more examples would be beneficial to members. Other examples will be added to the documentation under each of the reporting guidelines as the DSF learns of them.</p>
General Comment	<p>We provided feedback during the 2017 Stakeholder consultation period recommending the inclusion of measurable metrics and targets for indicators that are context specific. We also suggested that you provide guidance regarding the reporting of indicators. We feel the current indicators lack ambition and feel that they won’t guarantee that environmental challenges of dairy production will be sufficiently and appropriately addressed.</p>	<p>We must remember that the sector is just at the beginning of its sustainability journey. As we gain data we will develop trend lines and readjust requirements as necessary. We hope that we can demonstrate progress through the high-level indicators.</p> <p>We must acknowledge that the DSF membership includes the global dairy sector which includes both emerging and developed dairy nations. While it is difficult to have more specific measures that can be implemented globally, we anticipate that future revisions will provide more detail and specificity.</p>

<p>Soil Quality & Retention</p>	<p>What is a Soil Quality Plan? How is it defined? We are concerned that there is no established, recognized definition of a Soil Quality Plan.</p> <p>Furthermore, how do we avoid the pitfalls of zero participation because members don't define a soil quality plan, or 100% participation because members can call anything a Soil Quality Plan?</p> <p>Suggestion: end the indicator at practices, and list practices or end outcomes in the guidelines (i.e. erosion control, reduced tillage, etc.) and ask that these be reported. It would be more difficult to obtain but could be more relevant and meaningful.</p>	<p>It was determined through discussions with membership that members should establish their own requirements for plans to best service local needs. It is proposed that the DSF members share Soil Quality Plan examples via the DSF website for members to review as a resource for designing their own Soil Quality Plan.</p> <p>We anticipate that future revisions will provide more detail and specificity to ensure participation and effectiveness. We must acknowledge that the DSF membership includes the global dairy sector which includes both emerging and developed dairy nations.</p>
<p>Soil Nutrients</p>	<p>How will members assess plan implementation? Cross-checking fertilizer recommendation rates to actual application seems very labor intensive.</p>	<p>The DSF's current requirement is only for the presence of a plan and the DSF itself will not seek evidence of plan implementation. This is to be pursued at a local level involving the local multi-stakeholder Management Group. As the sector progresses, the DSF and the indicators will evolve. A future revision could require evidence of the plan and implementation.</p>
<p>Water Availability & Quality</p>	<p>Is the reporting of 'water used to produce a kg of product' for the entire supply chain or for the processing facility only? Would farmers have accurate records of water use?</p>	<p>This depends on who the DSF member represents and the priority they have identified, whether it is the processing facility or the farm. The IDF water foot printing guidelines, Appendix 1 provide the guidelines for data required for water foot-printing on farm. It recognizes that water quantity may need to be estimated. Functional unit used on farm is 1kg of fat and protein corrected milk (FPCM), for example.</p>

<p>Water Availability & Quality</p>	<p>Having the two indicators for water quality and availability is positive. In some places, the Effluent Management Plan wouldn't be helpful at farm level because it would be defined as a Nutrient Management Plan, which is the indicator for Soil Nutrients.</p> <p>The requirement for water-use efficiency asks for the volume of water used to produce a kg of product. Why not use the recognized approach of water footprint, using the IDF methodology?</p>	<p>If the Nutrient Management Plan covers collection, storage, management and utilization of the effluent at farm level, then the Nutrient Management Plan covers the requirements of an Effluent Management Plan and could meet the requirements for both Indicators.</p> <p>Guidance note wording will provide greater clarity in response to this comment. Although the IDF guide is mentioned, it is not directly correlated with on farm water usage and the L/kg of product produced not directly aligned with the processing part of the value chain.</p>
<p>Biodiversity</p>	<p>We recommend that you utilize a multi-stakeholder approach to develop reporting guidelines that include metrics and indicators that fit the context of dairy production and environmental conservation that would be used by all dairy coops and companies to transparently report progress of environmental conservation achieved over time.</p>	<p>The indicators are high level measures of each Global Criteria's strategic intents. Reporting guidelines will be developed in cooperation with Membership and will likely vary based on the local priorities and knowledge systems related to the Global Criteria. The indicator 'Metric for Biodiversity' will remain the same.</p>
<p>Working Conditions</p>	<p>Working conditions are linked to the social welfare policies of governments and the country's legislation policies and implementation. Having measures that show the implementation efficacy would be helpful. A uniform requirement of measure could disadvantage some members because it would negate variables like the economic status of the country, the priorities needs and the key stakeholders that ensure the sustainability of the dairy industry there.</p>	<p>It is important to note that these are high level indicators and not 'hard measures.' We recognize that some geographies may not have any regulations or policies regarding working conditions, so a Farm/Facility Safety Plan was deemed the most appropriate start. Implementation levels will be considered during future revisions.</p>
<p>Working Conditions</p>	<p>Is the description for the first link under Global resources for plan development "FAO Safety and Health..." correct, or should it read "ILO Safety and Health...?"</p>	<p>It should read "ILO Safety and Health in Agriculture" – correction made as recommended.</p>
<p>Animal Care</p>	<p>We feel that Somatic Cell Count is inadequate to define animal care (animal welfare). We propose that the indicator should be similar to those of the other criteria. For example, a comprehensive management plan that deals with all facets of animal care/welfare.</p>	<p>The Animal Care metric was established in the first group of criteria indicator development, so the parameters were different. We agree that your suggested indicator is more like the current group of indicators, and your point will be considered in the next review, before the next revisions are made.</p>

