

MS comments Template

QF003 Reference #: CQ/2026/0276b	Document: DCRCP 12: 202x – Cocoa – Good Agricultural Practices
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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
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DM	Entire document	ge/te/ed		The wording in this standard blurs the distinction between the raw agricultural material (cacao) and the processed products (cocoa, chocolate, etc..) derived from it.		See below	Accepted Include a definition for Cacao and Cocoa. Check the use of the terms throughout the draft.
JM		All	ge	The terms “cocoa” and “cacao” are used in consistently throughout the document. Point 3.18 titled heirloom cacao. Within the point, Note 1 refers to heirloom cocoa. Throughout document both terms used interchangeably.	Adopt the term “cocoa” to refer to the beans and derived materials. And use the term “cacao” when making refence to the botanical name: Theobroma cacao L.	Upon review of the document the distinction will be made as applicable.	Accepted Include a definition for Cacao and Cocoa. Check the use of the terms throughout the draft.

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JM		All	ge	The terms “clone”, hybrid”, “family”, genetic group” and “landrace” are used throughout but not defined. Refer to Point 3.35 Note 2 where it instructs users to specify whether the plan material is a clone, hybrid, family or accession to avoid operational confusion. However, all four are undefined.	Add definitions for “clone”, “hybrid”, “family”, ‘accession”, “genetic group” and “landrace” to Clause 3. Make use of currently recognized genetic groups of Theobroma cacao L. by Motamayor et al. 2008.	Accession, clone, family, landrace – appear as a note. RTC to advise whether it is necessary to define these terms.does not appear in standard, Genetic Group is not mentioned in the standard. Consider these definitions, if needed: accession a distinct sample of germplasm collected, maintained, and documented in a gene bank, breeding programme, or field collection, which is assigned a unique identifier for conservation, evaluation, and use. clone group of plants derived from a single parent plant through vegetative propagation and therefore expected to be genetically identical, except for any mutations that may occur. family a group of progeny derived from a known parental combination, such as a controlled cross, open-pollinated parent, or self-pollinated parent, and sharing a common genetic origin. hybrid	Accepted Definitions recommended by the consultant are to be added to the draft. Add definition for 'genetic group'. genetic group genetically differentiated population or cluster within Theobroma cacao L., identified on the basis of shared patterns of genetic variation and ancestry, and distinguishable from other such populations within the species. Also add definitions to the terms 'cacao' and 'cocoa' and make the differentiation in the draft. Cacao - scientific and horticultural aspects of the cocoa tree (Theobroma cacao L.) as well as the fresh unfermented beans Cocoa - fermented and dried bean of the cocoa tree (Theobroma cacao L.) or to products made from the fermented and dried beans
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						an individual resulting from the cross between two genetically distinct parents, which may belong to different clones, families, varieties, populations, or genetic groups. landrace a locally adapted, genetically diverse population that has developed over time through farmer selection and natural adaptation to a specific geographic area, typically without formal plant breeding.	

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HT	Forward			<i>Objective: Decolonize the historical narrative of Caribbean cocoa and establish the indigenous heritage as the official foundation of our comparative advantage.</i> Insertion Point: Foreword of standards DCRS 87 and CRCP 12.	"Cocoa from the CARICOM region derives its unique character from a millennial heritage. Long before its modern commercial exploitation, cocoa was a dietary, medicinal, spiritual, and trade resource for the indigenous peoples of the Caribbean (notably the Tainos, Arawaks, and Kalinagos). This standard recognizes and protects this pre-Columbian anteriority, which constitutes the historical foundation of the 'Heirloom Cocoa' identity and the traditional agroforestry systems of our region."		Partially Accepted Include the following text to the Foreword 'Caribbean cocoa reflects a rich heritage shaped by Indigenous knowledge, traditional practices and generations of regional cultivation and processing'.

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HT	Scope Section 1 / —	—	Techn ical	The majority of cocoa farms in Haiti and small island states are under 2 hectares and managed by smallholders. The standard should explicitly mention adaptability to small-scale and resource-constrained farmers.	Add a sentence in Section 1: "This code recognizes the diversity of production scales and offers flexible guidance suitable for smallholder farmers and traditional agroforestry systems."	Section 1 deals with the Scope. Is this new sentence more suitable for the foreword? Most of what is stated in 3 rd . para. in Foreword is repeated in the 5 th . Should be deleted and replaced Consider the following as a replacement: In developing this Code of Practice for Cocoa, it was understood that most farms across CARICOM are small and managed as smallholdings. The Code therefore recognises that there is a diversity of farms size and provides flexible guidance that can be applied in smallholder settings and traditional agroforestry systems.	Accepted Include the proposal from HT. There is repetition in the 2 nd para and 5 th para of the Foreword. Delete 5 th para.
JM	Scope	Parag 2	ed	Under Scope, second paragraph, the term “agro-chemicals” is hyphenated but in the terms and definitions as well as throughout the document it is not hyphenated. There is a full stop after documentation of farming operations., traceability, and food fraud prevention	Remove hyphenation and use the term “agrochemicals” throughout. Remove the full stop and leave the comma.	Accepted.	Accepted Change the term to agrochemicals. Remove full stop.

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TT	3.3	Pg3	TE	biological contaminant... Is this only for the whole organism or organism parts as well? Having the word may suggests that there is inconsistency in application.	Review definition for biological contaminant.	The term -biological contamination- is at 3.3. If biological contaminant is preferred then consider: any biological agent, including microorganisms and their by-products, that is not intentionally introduced and that may compromise the safety, quality, health, or phytosanitary status of the product. Note 1 to entry: Biological contaminants include insects, nematodes, bacteria, viroids, viruses, fungi, protozoa, parasites, and other pathogenic or spoilage organisms.”	Accepted It is for organism parts as well. Change text as well 3.3 biological contamination presence of harmful biological agents or organisms in cocoa bean or cocoa derivatives that may compromise food safety, products quality or <i>suitability</i> for use Note 1 to entry: Biological agents or organisms may include pathogenic microorganisms, moulds, yeasts, parasites, pests, other harmful organisms <i>or fragments</i> .
TT	3.34	Pg7	TE	terroir: note2 can be used as the definition	Terroir is the result of the interaction between genetics, environment and human management practices and may vary between countries, regions, communities, farms and individual production sites.	Accepted in part The current definition seems more complete as it goes on to describe the result of the interaction of the various factors mentioned.	Not accepted Agreed to maintain the current definition and remove the Note 2 as the current definition seems much clearer. Note 2 was deleted.

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TT	3.35	Pg7	TE	variety: ‘genetically distinct’ used but no mention of DNA profiling.	Add ‘genetically distinct’ into Note1? Maybe put in a definition for genetically distinct	Genetically distinct is only found in the definition of variety. Consider this adjustment to the definition: “variety a distinct group of plants within the lowest recognized botanical category, which is defined by traits from a specific genotype (or combination of genotypes), can be clearly distinguished from other groups, and can be reproduced without change” Adjustment to Note 1: Genetically distinct types of cacao can be identified by their unique traits in plant form and growth, productivity levels, resistance or susceptibility to diseases, bean size and quality, how well they perform during processing, and the flavor characteristics that set them apart from other cocoa varieties	Partially accepted Add a note that genetic identity may be supported by recognized source records and morphological descriptors and, where necessary for verification or higher-value identity claims, by molecular or DNA methods. DNA profiling should not be made mandatory for all smallholders. Note 2 to entry: In trade and casual industry contexts, "variety" is often used loosely. <u>However</u>, precise technical communication should specify whether the plant material is a clone, hybrid, family, or accession to avoid operational confusion <u>and could be considered a "cultivated variety"</u>.

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HT				Regarding this point of the varieties: everyone knows the traditional varieties are Forastero, Criollo, and Trinitario. However, a new classification has actually been in place since 2008; we now speak in terms of genetic groups, as numerous genetic mutations account for this updated categorization. The question—from a communications, traceability and marketing perspective—is whether to stick with the old nomenclature or adopt the new one. It is worth noting, for instance, that there is a great deal of fraud surrounding the use of the "Criollo" label.			Partially accepted Include definition for Genetic group: A genetically differentiated population or cluster within Theobroma cacao L., identified on the basis of shared patterns of genetic variation and ancestry, and distinguishable from other such populations within the species. Include to 5.3.1 Example: EXAMPLE Planting material may include <u>cacao from different genetic groups as well as hybrids and selections</u> such as Criollo, Trinitario, Imperial College Selection (ICS), Trinidad Selected Hybrids (TSH), Grenada Selection (GS), local landraces and other nationally or regionally recognised varieties, clones or hybrids. Also 13.9.2 Regionally important <u>cacao from different genetic groups as well as hybrids and selections</u> , may include Criollo, Trinitario, Imperial College Selection (ICS), Trinidad Selected Hybrids (TSH), Grenada Selection (GS), local landraces, heritage cacao trees and other nationally or regionally recognised varieties, clones or hybrids.
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HT	Site Selection / Section 4.1	—	Techn ical	In mountainous topographies like Haiti, strict slope restrictions can exclude historic quality cocoa zones. Soil conservation measures should be prioritized over outright land exclusion.	Modify text to: "Where slope exceeds recommended limits, appropriate soil conservation structures (such as contour hedgerows, stone bunds, or living terraces) shall be established prior to planting."	Not sure where this modification is to be considered	Partially accepted This has been addressed in 6.6.1 d) and 6.6.2. Wording changed in 6.6.1 d): d) on very steep or unstable slopes greater than 30 % (greater than approximately 16.7°), cocoa establishment should be avoided unless otherwise approved by the relevant national competent authority.

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TT	4.21 (b):	Pg7	TE	'recently' should be replaced with a defined time gap/limit	b) cocoa should not be planted on recently — (Include time limit) deforested natural forest land;	Accepted in part. Suggested rewrite giving definite timeframe will not be practical. There are many national forest protection laws in the region and the time limit would vary. This decision should be left to the discretion of the competent national authority Consider adjustment to clause: Cocoa should not be planted on land where natural forest has been cleared within the period prescribed by the competent authority. Note: This is intended to ensure that cocoa production does not contribute to deforestation or the conversion of natural ecosystems.	Partially accepted Agreed to replace the undefined term "recently" with wording linked to applicable national and/or import-market deforestation rules. The draft should not cite the EU regulation in the core text because national legislation and other market requirements may also apply. Change b) to: b) cocoa should not be planted on recently deforested natural forest land <u>according to National or import market deforestation rules;</u>

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TT	4.21 (c):	Pg7	TE	It is impossible to keep out domestic and wild animals from cocoa production i.e. cocoa growing areas. Should the type of animals be specified?	Consider rewording to include the type of animal.	Accepted. Clause to be modified as follows: 4.2.1 (c)Domestic animals shall be excluded from cocoa pod harvesting, pod storage, pod breaking, cocoa bean fermentation, drying, and storage areas. 4.2.1 (d) Appropriate measures shall be implemented to minimize access by wild animals and reduce the risk of contamination or crop damage.	Accepted Apply controls where animals pose a food-safety contamination risk, including pod breaking, fermentation, drying, storage and processing areas. Change to : c) domestic and wild animals should be kept out of cocoa production, fermentation, drying and storage areas through appropriate measures based on risk; <u>This control should apply to areas where animals pose a food safety contamination risk.</u>

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TT	4.2.1 (C)	Pg 7	TE	Is it supposed to be pod harvesting, pod storage & pod breaking?	Change to ' pod harvesting, pod storage & pod breaking'.	Accepted.	Not Accepted It isn't necessary to include the word 'pod' in all areas, as this is a cocoa standard and the product is cocoa. Therefore the harvesting process is related to cocoa pods. The term harvesting would be used in the draft and pod breaking and pod storage. Comment related to 11.1.6
TT	4.2.1.f	8	TE	Suitability of soils to support cocoa growth should also be considered as this can impact long-term production. Soils of low suitability can drastically increase the cost of medium and long-term production	Include “soil fertility” in risk assessment considerations	Accepted. Add “soil fertility” as f(6)	Accepted Place at the top of the list.
RTS C	4.2.1 f)			Aluminium is a concern in Suriname.	Add Aluminium to the list in f).		Accepted Add to list in f) Also added to 4.2.1 h) note and 6.4.2.

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TT	4.3		TE	Farm planning and layout – emphasis was only given to site selection, but not to production systems, mechanisation planning; soil test and soil fertility management, soil contaminant risk avoidance, soil conservation and erosion control, should be here but misplaced later under seed gardens. It mentions contour drains, contour drains are of no use if they are not coupled with main drains.	Include in this section, production systems, mechanisation planning; soil test and soil fertility management, soil contaminant risk avoidance, soil conservation and erosion control. Remove from under seed gardens. Include main drains.	Accepted. Consider adding 4.3.1.(i), as follows: Farm planning should also consider other practices that help to make farms productive, efficient, safe and resilient. These practices include: (i) adopting the most appropriate type of production system. such as monocropping, mixed cropping, or agroforestry, depending on local conditions and farmer capacity. (ii) using tools and equipment that reduce labor, improve efficiency, and suit the scale of the farm. (iii) conducting soil tests to determine nutrient levels and the application of fertilizers or organic matter to keep soil healthy and productive. (iv) preventing contamination of farm from chemicals, waste, or polluted water sources by choosing safe inputs and proper storage. (v) protecting soil structure and fertility through mulching, cover crops, and reduced tillage. (vi) using ground cover, barriers, or planting patterns to stop soil loss on slopes and exposed areas. (vii) designing contour drains and main drainage channels to manage water flow, prevent flooding, and reduce erosion.	Accepted Create an Annex for the additional information recommended by the Consultant. 'Additional elements to consider for site maps'. Also add h) in the annex
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TT	4.3		TE	Variety -selection of variety was mentioned but no mention of type of propagule, cross- compatibility, deployment of varieties ensuring genetic diversity & fidelity (nuanced depending on terrain, and soil conditions)	Include type of propagule, cross- compatibility, deployment of varieties	Accepted. Replace 4.3(h) with: variety, type of propagule, cross- compatibility, deployment of varieties, clone or planting material blocks, where known	Accepted Place in new Annex variety, type of propagule, cross- compatibility, deployment of varieties, clone or planting material blocks, where known
HT	4.6			<i>Objective: Translate compliance with Good Agricultural Practices into insurance premium reductions for farmers facing climate risks.</i> Insertion Point 1: Clause 4.6 (Climate resilience) - Add a sub-clause 4.6.3.	Proposed Text: "Documented climate resilience measures (shade, windbreaks, drainage) must be structured into an auditable database. This documentation aims to facilitate micro-local risk assessment by financial institutions, to optimize access to parametric insurance and obtain premium reductions (de-risking) for producers."		Partially Accepted Change 4.6.2 and include a note. New text 4.6.2 . These measures should be documented. Note: Measures may include drainage maintenance, shade management, windbreaks, soil cover, water harvesting, emergency storage protection
TT	5.1 , 5.2 and elsewhere:	Pg 10	TE	Competent authority/authorised body used but no mention of how competency is to be decided or how an entity can become authorized.	Include definition for Competent authority/authorised body.	Rejected. Definition already included in 3.10.	Not Accepted Definition for competent authority is provided in 3.10.

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HT	Cadmium & Heavy Metals / Section 5.3	—	Techn ical	Volcanic soils in the region often have natural background cadmium. Standard testing costs are prohibitive for individual small farmers without institutional support.	Add note: "National standards bodies and agricultural ministries should assist smallholders through group sampling, soil mapping, and regional monitoring programs."	Agreed that the costs of testing could be prohibitive to individual farmers and that should be approached as shared responsibility, with national institutions expected to step in to reduce the burden on smallholders. Consider this note/new clause: National standards bodies, ministries of agriculture, and other relevant organizations should provide institutional support to assist farmers in meeting compliance requirements relating to testing for cadmium and other heavy metals in soil such as: (i) Coordinating regional or collective testing programs to reduce per-farmer costs; (ii) establishing subsidized laboratory services or mobile testing units accessible to rural communities, (iii) providing technical guidance and (iv) training on sampling methods to ensure reliable results.	Not accepted Comment related to 7.5 Outside the scope of this standard. It is up to each member state to determine what assistance they would like to provide to smallholders.

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TT	5.3.2		TE	It may be advisable to include/emphasise that in order to preserve the genetic identity of desirable planting material (fine of flavour, heritage, regionally recognised etc.) that only vegetative propagation must be done.	Include to text ' only vegetative propagation must be done'.	Agreed in part. Consider adding Note 2, as follows: to preserve the genetic identity of desirable planting material (fine of flavour, heritage, regionally recognised etc.) only vegetative propagation should be done	Partially Accepted This is practically feasible in many countries because of the infrastructural requirements and expertise required. Add NOTE: It is recommended that vegetative propagation is practiced.
TT	5.3.1	page 10	TE	Unaware of Georland Sections (GS) referred to on page 10 under. The only GS clones I know in the Caricom region are the Grenada Selections. Please clarify this.	Clarify what is Georland Sections (GS)	Accepted. Change to Grenada selection.	Accepted Change to Grenada selection.
TT	5.4.2		TE	Management of seed gardens, budwood garden and nurseries are mentioned here. It is misplaced here. This should be a separate section as it does not relate to the farmer and his or her production system. It is related to best practices for nurseries.	New section related to best practices for nurseries. Include under this section the management of seed gardens, budwood garden and nurseries.	Rejected. Adding a section on best practices for nurseries will put an unnecessary and impractical responsibility on farmers that they are not equipped to carry out. Best practices for the management of seed gardens, etc. should rest with institutions or entities that can guarantee technical competence, quality, security and sustainability	Accepted 5.4.2. Remove a) and c) And add to the list under 5.5.2

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JM	5.5.2 a		te	"Verification of genetic identity and scion or cocoa budwood source, where known" specifies an outcome but no method is given.	Add an annex on verification of genetic identity: i. Standardized morphological characterization using recognized descriptors. Molecular verification by SNP fingerprinting against reference profiles held in germplasm databases.	Rejected The value of such an annex to farmers will be indirect. They may not be able to perform the molecular verification mentioned. However, it will be necessary for research institutions, certification bodies and nursery owners/operators to assure the farmer of the genetic fidelity of the planting material that they receive has been scientifically verified.	Partially accepted Note included under 5.5.2 NOTE Verification of genetic identity may include standardized morphological characterization using recognized descriptors or molecular verification by SNP fingerprinting against reference profiles held in germplasm databases.
HT	Water Quality / Section 6.2	—	Techn ical	Requiring fully treated/potable water for cleaning non-contact farm equipment creates an unviable financial and operational burden for rural smallholders with limited infrastructure.	Change requirement to: "Water used for cleaning tools and equipment shall be clean, non-contaminated surface or groundwater, reserving potable water quality strictly for direct bean contact operations."	6.2 refers to soil quality. Section 8.4 that speaks to water quality allows for suitable water quality for intended use, stressing that water testing should be based on risk (8.4.3) The source of the water is not specified in the standard (8.2.2) because the farmers may choose to have municipal supply or provide their own measures as appropriate. Note that suitable water quality for various activities is emphasised in 8.4.4	Noted This is addressed in section 8.4, specifically 8.4.2 Water testing shoul d be based on risk.

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TT	6.4	Pg 12	TE	Testing for metal levels in soil should be mandatory for areas in which cacao is grown and from which the beans will be batched for export. If metal levels are only a concern for EU markets this can be written in.	Include testing for metal levels in soil for beans that will be batched for export.	Accepted. 6.4.3 could be changed to “ testing for heavy metals such as cadmium should be risked-based……etc?	Noted The current draft already addresses these comments. Clause 6.4.3 addresses testing of cadmium for export-oriented cocoa and clause 6.4.4. addresses heavy metal testing.

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TT	6.6.1	Pg 13	TE	How is “unacceptable environmental risk” decided or defined? Who decides this?	Define unacceptable environmental risk?	Accepted in part. The competent authority should determine what is “unacceptable environmental risk” as indicated in the clause. Definition for “environmental risk” to be added. environmental risk the probability that an activity, process, substance, or condition will cause harm to the environment, including soil, water, air, biodiversity, ecosystems, or natural resources, and the potential magnitude of that harm. Note 1 to entry: Environmental risk is typically assessed by considering both the likelihood of an environmental impact occurring and the severity of its consequences and may include soil erosion; deforestation and habitat loss; water contamination from fertilizers or pesticides; loss of biodiversity; improper disposal of agricultural waste; sedimentation of waterways; air pollution from burning vegetation or waste.”	Partially Accepted Change to d) on very steep or unstable slopes greater than 30 % (greater than approximately 16.7°), cocoa establishment should be avoided unless otherwise approved by the relevant national competent authority. A definition has already been provided in the draft for competent authority.

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TT	7.5	Pg 14	TE	Is there an expiration period for soil heavy metal analysis results? After testing and level found acceptable, is there a minimum time before another soil test is officially required? Is a soil test analysis required for every export batch?	Include the batch and frequency for conducting a soil heavy metal analysis and the expiration period for soil heavy metal analysis results.	Accepted in part. Usually soil analyses have an expiration period and different authorities may require different time periods Consider this new sub clause 7.5.4 and note: “Where monitoring of soil heavy metal results and analyses is deemed necessary, testing shall be repeated at intervals specified by the relevant competent authority, certification scheme, buyer requirement, or intended export market. . Note: Results of soil heavy metal analyses are considered valid during established period, provided there have been no significant changes in land use, contamination sources, or environmental conditions affecting the site.	Partially Accepted Add note under 7.5.3 Note: Frequency of testing may be determined by risk factors, such as flooding or changes in land use.
TT	7.9.1	23	TE	The batch number of the fertiliser should be recorded in the case of fertiliser recalls or new information regarding the inactive components that can impact farm contamination	Include “batch or lot number of fertiliser” in recorded information for fertilisers	Accepted	Accepted Add new b) b) batch or lot number of fertiliser

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TT	8.2 and 8.5	Pg 16	TE	Water-source protection: water sources identified and linked to sustainable sources. However, farmers may need legal permission to extract water from these natural sources. Similar concern for Section 8.5 (pg 17) irrigation should be in compliance with national laws.	Include to each section ' should be in compliance with national laws'.	Accepted. Consider an extension to 8.2.2 as follows: Water to be extracted from any of these sources for use on the cocoa farm, shall be in compliance with the national legislation.	Accepted The following text was added to the end of 8.2.1, 8.2.2, 8.2.3 '.....in accordance with the national laws'. The text was also added to clauses 8.5.2, 8.5.3 and 8.5.4.

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HT	Fermentatio n & Drying / Section 8.3	—	Editor ial / Techn ical	Sun drying on raised wooden tables or bamboo trays is a widely used sustainable technique in Haiti. Raised wooden/bamboo structures should be explicitly listed alongside plastic/tarp structures.	Amend clause to: "Drying beds may include raised wooden frames, woven bamboo mats, or slatted tables elevated at least 0.5 m above ground level to prevent contamination."	Accepted Clause mismatched. 8.3 is not about fermentation and drying. Clause 11.4 allows for local adjustments. Drying beds and type of material not covered in the standard this entry can be a note. Consider: inserting after 11.4.1 Drying of cocoa beans shall be conducted using appropriate methods that include raised drying beds, mats or platforms constructed of clean, non-toxic materials or other recognised methods such as solar dryers. <i>Note: Drying beds may include raised wooden frames, woven bamboo mats, or slatted tables elevated at least 0.5m above ground level to prevent contamination. The direct contact of the cocoa beans with bare soil or surfaces that may introduce foreign matter shall be avoided.</i>	Partially Accepted This varies throughout the region. Add to the end of the sentence in clause 11.4.1 '..... in the specific CARICOM member state'.

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TT	8.4	Pg 16	TE	Water quality and testing: water testing is indicated to be based on risk (8.4.2) and in 8.4.3 it is indicated that ‘water testing should be considered...where contamination is suspected’. When contamination is suspected, water testing must be done.	Change to ' When contamination is suspected, water testing must be done'.	Accepted in part. Could be where or when	Partially Accepted Include a note under 8.4.3. Note: Where there is mandatory legislation for water pollution and water quality, organizations will be required to comply with the relevant legislation.
TT	8.6.3:	Pg 17	TE	Vegetative buffer strip given as 5 m; should this be 5 m wide?	Clarification required	Accepted. Add "wide" for clarity 8.6.3 Vegetative buffer strips of at least 5 m wide should be established where practicable.	Accepted

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TT	9.2.1:	Pg 19	TE	Monitored regularly should be changed to recommended specified time interval based on area and climate	Include a recommended specified time interval based on area and climate	Not accepted consider adding this sentence to 9.2.1 Monitoring frequency should be increased where pest pressure, environmental conditions, or crop susceptibility indicate an elevated risk of infestation or disease outbreak.	Partially Accepted The requirement for regular pest and disease monitoring is supported; however, prescribing a single fixed monitoring interval is not considered appropriate for all cocoa production systems across CARICOM. Monitoring frequency should be risk-based and appropriate to the pest or disease concerned, crop stage, season, prevailing weather conditions, known disease pressure and local epidemiological conditions. Monitoring should be sufficiently frequent to allow early detection and timely implementation of appropriate control measures. Where established national or local surveillance recommendations exist, these should be followed. Reword to: 9.2.1 Cocoa fields shall be monitored for signs and symptoms of pests and diseases at a frequency appropriate to the identified risk, taking into account the pest or disease concerned, crop stage, season, prevailing weather conditions and local pest and disease pressure, to facilitate early detection and timely intervention.
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TT	9.3.1.i	36	TE	Spores may be present on trees that show no visible signs of infestation. Therefore, farmers should be encouraged to clean equipment between trees to limit cross contamination.	Change, “cleaning or disinfected tools used on diseased or infested plant material before reuse” to, “cleaning or disinfected tools before reuse on new trees or different plant materials”	Accepted: Consider changing “disinfected” to “disinfecting” cleaning or disinfecting tools before reuse, on new trees or on different plant materials	Accepted
TT	9.7.4:	Pg 21	TE	Simplified records must include dates	Include dates to records	Accepted: Add date that the record was made	Accepted

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HT	Traceability / Section 10.1	—	Techn ical	Smallholders selling fresh beans to centralized fermentation centers often lack digital tracing tools. Group certification and paper-based receipt books must remain fully recognized.	Add provision: "For smallholder supply chains, farm-level traceability may be achieved through cooperative purchasing logbooks or paper batch receipts managed by processing centers."	Clause 10.1 is not on traceability. This is covered under Clause 16 This provision is already included in the clause. Maybe add a note to 16.1..2 as follows: 1Note: For smallholder supply chains, farm-level traceability may be achieved through cooperative purchasing logbooks or paper batch receipts managed by processing centers.	Partially Accepted Related to 16.1.2 In Annex B 'Smallholder implementation checklist', under B8 Records and traceability, the draft states 'cooperative ledgers' notebooks or farm diaries, buyer receipts and other records that can be kept. Change to: The traceability system should be appropriate to the size, structure, complexity and risk level of the operation and in accordance with the needs of the CARICOM member state.
TT	10.3.6:	Pg 22	TE	Mixing of more than two agrochemicals’ should be changed to ‘Mixing of agrochemicals’	Change to Mixing of agrochemicals’	Accepted.	Accepted
TT	10.4.1:	Pg. 22	TE	Change cleaned to ‘properly cleaned’	Change to ' properly cleaned'	Accepted.	Partially Accepted Change to 'appropriately cleaned'
TT	10.5.7:	Pg. 23	TE	Change ‘closed’ to ‘securely closed’	Change to 'securely closed’	Accepted.	Accepted

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TT	10.8.2	15	TE	The batch number of the pesticide should be recorded in the case of pesticide recalls or new information regarding the inactive components that can impact farm contamination	Include “batch or lot number of pesticide” in recorded information for pesticides	Accepted	Accepted Include new c) batch or lot number
HT	11.3			<i>Objective: Align the region with international labor standards while legally protecting the family transmission of traditional knowledge against unfair criminalization by foreign auditors.</i> Insertion Point: Labor and Social Well-being Section (CRCP 12).	"The CARICOM cocoa sector strictly prohibits all forms of exploitation, forced labor, and hazardous child labor, in accordance with ILO conventions. However, the standard must explicitly distinguish these abuses from the intergenerational transmission of knowledge. The participation of youth in non-hazardous family agricultural activities, outside of school hours is recognized and protected as a fundamental mechanism for cultural education and the preservation of our traditional agroforestry heritage".		Noted This comment is related to 17.1.2 i) The participation of youth in non-hazardous family agricultural activities, outside of school hours is considered a young worker This draft addresses the comment as it recommends that the legal and regulatory requirements for labour (which includes young worker) and child labour be followed. However the CRS 87, Voluntary Sustainability Standard for cocoa products and chocolate – Requirements makes the distinction between child labour and young worker, it defines both the terms and provides the conditions where a young workers is acceptable.

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TT	11.3		GE	Sub-Clauses appear to be more high-level guidance than an actionable points. It lacks specific measurable parameters (e.g. determination of end point like temperature threshold, cut test, aroma, also no guidance on turning intervals, fermentation vessels etc.)	Include specific measurable parameters (e.g. determination of end point like temperature threshold, cut test, aroma. Also include guidance on turning intervals, fermentation vessels etc.)	Noted. Consider the following sub-clause (after 11.3.1) to give additional guidance to farmers: During the fermentation of cocoa beans, the farmer should: (a) use approved vessels, such as wooden boxes, baskets, or trays made of clean, non-toxic materials. (b) turn beans at intervals set by the competent authority or certification scheme to ensure uniform fermentation. (c) check fermentation end point by using simple, measurable signs such as: (i) temperature reaching the required threshold (ii) cut test showing uniform brown color inside beans. (iii) characteristic cocoa aroma (specified by main buyer)	Partially accepted Clause 11.3.1 has been strengthened to identify key factors affecting fermentation and to require relevant process parameters to be monitored and recorded, as appropriate. Supporting notes identify parameters for monitoring fermentation progress and endpoint. Fixed values for duration, temperature and turning frequency are not prescribed because appropriate fermentation conditions vary with genetic material, wet bean quantity, pulp characteristics, fermentation system, environmental conditions and intended quality outcome. This avoids a single “recipe” approach and recognises the nuanced nature of cocoa fermentation. Clause 11.3 was reworted and notes added.
TT	11.4.4:	Pg. 27	TE	Cocoa beans during drying should also be protected from dust and bird droppings	Include to cocoa beans drying, protection for dust and bird droppings.	Accepted. Insert after (g)	Accepted

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TT	11.5.2		TE	Bean clusters/double beans are usually considered as defective/or as cocoa related matted as well (TTS 647:2019, ISO 2451:2017)	Reconsider term	Accepted. Add “bean clusters” to the list Bean clusters/double beans to be consistent with (TTS 647:2019, ISO 2451:2017)	Accepted Add “bean clusters” to the list
TT	11.5.2:	Pg. 27	TE	Delete should and where applicable (check this phrasing throughout);	include new condition – moisture level over 7.5%	Where applicable is used many times in the text. RTC to advise if this should be deleted. Agreed. add “moisture level over 7.5%” as 11.5.2 (i)	Partially Accepted Clause was restructure to include a reference to the CRS 83, Cocoa bean quality – Specification which contains the requirements for cocoa bean quality and grading.
TT	11.6		GE	Perhaps a threshold value of relative humidity and/or temperature for storage would be useful (and any other parameters that may affect quality significantly)	Include a threshold value of relative humidity and/or temperature for storage and any other parameters that may affect quality significantly.	Accepted. Add maximum values to clause 11.6.7. 11.6.7 Storage conditions should be managed to reduce exposure to high relative humidity (above 70%), condensation, leaks, flooding and other conditions that can increase moisture content to more than 8.0% or promote mould growth	Not Accepted In the current draft, clause 11.6.7 mentions humidity however the threshold are not included in this standard. The Regional Standards CRS 83, Cocoa bean quality – Specification outlines the threshold values.

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TT	13.2.4:	Pg. 33	TE		Delete ‘where practicable’	Rejected:.. These conditions may not exist everywhere	Not Accepted. Impracticable to protect all areas. No change made.
TT	13.3.4 (d) & 13.11.2 (g)	Pg.34 Pg. 36	TE		Change to ‘use minimal herbicides and pesticides’	Noted. Why not the term “blanket herbicide”? A blanket herbicide refers to a herbicide which is applied uniformly across an entire field/farm/zone rather than at specific or targeted pests	Partially Accepted The statement should state that herbicides and pesticides should be used where justified by the identified pest, disease or weed-management need and should be applied in accordance with label requirements and applicable legislation. Add to list - using herbicides and pesticides only when justified, for specific pest, disease or weed needs, in line with product labelling requirements and applicable laws.

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HT	13.10			<i>Objective: Standardize data collection to enable producers to access voluntary carbon markets.</i> Insertion Point: Clause 13.10 (Ecosystem services and market value) - Add a sub-clause 13.10.4 .	"To facilitate access to Payments for Ecosystem Services (PES) and carbon/biodiversity markets, producers are encouraged to use standardized spatial and quantitative assessment frameworks. These tools standardize Measurement, Reporting, and Verification (MRV) protocols, enabling the scientific documentation of forest carbon stocks and transforming agroforestry into monetizable ecological assets."		Noted Clause 13.10.3 addresses this comment in a general way. The comments describes the mechanism which can be used which could be restrictive to some regions.
HT	15			Insertion Point 2: Section 15 (Recordkeeping) - Add a sub-clause under 15.4 (Additional records)	"Data derived from structural plot assessments must be extractable to prove physical climate risk mitigation to financial partners and insurers."		Noted. Clause 15.4.2 addresses plot data. The comment goes beyond the scope of the standard, as this standard does not address data for financial partners and insurers.

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HT	17.3			Axis F: Food Sovereignty, Health, and Intra-CARICOM Value Addition <i>Objective: Counter the export bias of the current texts by protecting local processors and stimulating the regional trade of products with high nutritional value.</i> Insertion Point: Clause 17.3 (Domestic market) of CRCP 12 and General Principles of standard DCRS 87.	"Certification requirements linked exclusively to overseas regulations (e.g., EUDR, strict heavy metal limits imposed by third-party markets) must not act as prohibitive barriers for intra-CARICOM trade. Progressive and tailored evaluation mechanisms must be established for micro-processors and local value chains operating within the domestic and regional markets. This approach ensures food sovereignty, promotes the health and well-being of Caribbean consumers through high-quality products, and maximizes the retention of value addition within the region."		Noted. The EUDR requirements does not form part of this regional standard however maximum limits for heavy metals have been addressed under clause 17.2.2. when considering export-related requirements.

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TT	18.4.4:	Pg. 47	TE	Verification should include biochemical and genetic tests	Include biochemical and genetic tests for verification	Accepted.	Partially Accepted Add f) confirming authenticity claims by biochemical and genetic tests.
JM	A.3		te	Examples of shade and intercropping species and Permanent shade tree species listed does not adequately reflect those used in Jamaica cocoa Agroforestry.	Consider including ackee, coconut, citrus and coffee.	RTC/Expert advice needed.	Noted. However, the list provides examples and it is not an exhaustive list. Add to the preamble , but not limited to:
TT	A.3:	Pg. 51	TE	Scientific names to be in italics. There are over 60 species of Sesbania. Are all of these recommended for use?	Italise scientific names.	Accepted.	Accepted Italicise the scientific name. Delete d) – unsure of which one to use.
TT	A.3	Pg. 51	TE	Trees with soft fleshy fruits can be part of a mixed farming system but should be reconsidered as permanent shade over cocoa due to increased risk of disease.	Reconsider trees with soft fleshy fruits.	Agree to reconsider. Such trees may be higher disease risks compared to timber or forest shade species.	Accepted Delete mango and avocado.
TT	A.6	Pg. 52	TE	Lower shade levels may be appropriate in areas with lower air temperature/cooler environments.		Accepted as is in standard	Accepted Add cooler environments

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TT			GE	Observation – Not a comment While reading sections 13.3.2 and 13.9.1 and 13.9.3 where mention was made of the importance of protecting old/historically important cocoa trees, where feasible, I thought of the ICS (Posnette) Collection at San Juan Estate. Since this is the last surviving 'original' site of the ICS clones in Trinidad (River Estate and St. Joseph Farm collections are gone and the Campus fields only contain some of the ICS clones), I hope that SJE is still preserving these ICS clones. I appreciate that there may no longer be any economic benefit for the owners to do this.		Noted....No change requested. RTC and Member States to note observation and consider: Notwithstanding that these cocoa trees may not be of any significance to the farmer, they can contribute to the genetic diversity, the fine/flavour cocoa of the Caribbean and offer some natural resilience or tolerance against pests and diseases caused by climate change, among other considerations Should a case be made for protecting old/historically important cocoa trees, where feasible, in CARICOM?	Noted – TT specific
				GENERAL COMMENTS			

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TT			GE	There seems to be considerable overlap between the two standards. In my opinion each standard should have a clear objective of what it wants to achieve.		Noted...but disagree: 1) Scopes are different (a) GAP standard establishes/focuses on a framework for the production of safe, traceable, and high-quality cocoa beans in CARICOM Member States to ensure food safety, quality, and compliance to requirements for regional and international markets. (b) VSS establishes the requirements for meeting broader sustainability goals—economic, social, and environmental—for cocoa and its by-products by addressing sustainability measures such as GMPs, governance, legal and others. These issues may have been referred to or are clearly absent in the GAP standard GAP is production-centric; VSS is market- and impact-centric (c) Could review the first sentence in the VSS scope to remove overlap, if any	Noted VSS was updated to establish clear objectives and distinct criteria.
TT			GE	Each standard covers a wide scope from cocoa production, cocoa postharvest processing as well as primary and secondary processing which causes confusion. If these are all treated under different sections it would improve clarity.		Noted..... but each standard covers different issues as they relate to the scope described Will review sections and adjust where and if clarity is needed.	Noted VSS was updated to establish clear objectives and distinct criteria.

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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
MB1	Clause No./ Subclause No./ Annex / Figure / Table	Line Number	Type of com- ment 2	Comment (justification for change) by the MB	Proposed change by the MB	Consultant’s Feedback	RTC observations on each comment submitted
TT			GE	The sections are poorly arranged. Need to have a logical arrangement based on management principles.		Not accepted The draft is organised into management-based structures such as • Farm management and planning • Input management • Production management • etc and follows a very similar logical arrangement as seen in other GAP standards.	Noted VSS was updated to establish clear objectives and distinct criteria.

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TT			GE	The sections are confusing – They should be in some order, tree management, shade o The sections are confusing – They should be in some order, tree management, shade management, pollination management, soil and soil fertility management, water management, risk management - vary according to the stage of the crop - o Reducing the cost of production – best practices (not outlined) - o Recycling wastes - o Safety - o Record keeping - Postharvest processing, quality and food safety management - Storage - Transportation - Record keeping and traceability - Branding and marketingmanagement, soil and soil fertility management, water management, risk management - vary according to the stage of the crop - o Reducing the cost of production – best practices (not outlined) - o Recycling wastes - o Safety - o Record keeping - Postharvest processing, quality and food safety management - Storage - Transportation - Record keeping and traceability - Branding and marketing		Review of flow of standard to be revised	Noted The recommended format is similar to a production plan. Several suggested topics are already addressed in dedicated clauses; cross-references have been used to avoid repetition. Branding and marketing is outside the scope of this standard.

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TT			GE	The standards should reflect our local context, situated within the Caribbean, mostly small Island States, small farm sizes (lack of economies of scale), high cost of land and labour and poor economies of scale. At present it seems very generic.		Noted. As an intended regional standard it has to show broad applicability as it is designed to provide a harmonized baseline across CARICOM Member Sates. When adopted nationally the standard can be tailored to the ecological, cultural, trade realities and national legislation of the member state. This is the expected pathway for effective implementation,	Noted These issues such as small farm sizes (lack of economies of scale), high cost of land and labour and poor economies of scale are outside the scope of the standard.
TT			GE	The region is exposed to an elevated risk due to the frequency and impact of hurricanes, sea level rise and flooding episodes, largely sloping and undulating terrains where cocoa is grown exposed to soil erosion and higher costs, El nino resulting in significant drought risks; and given the volcanic nature of the islands elevated risk of cadmium and other metal contaminants.		Noted. Some of these risks are addressed in the standard e.g. 4.6 Climate resilience and business continuity 6.5 Soil conservation and erosion control 6.6 Sloping land 7.5 Heavy metal and contamination risks 8.8 Extreme weather and corrective action, among others.	Noted Agreed with the consultant comment. The VSS also addresses the Caribbean context.

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TT			GE	Given these deficiencies identified in the two comments above (local context and elevated risk), our quality and sustainability standards should provide us the comparative advantage enabling us to stand out; not similar to others. Producers of solely or largely fine flavour cocoa, largely tourism-based economies, the unique heritage and innovative capacity should be highlighted in the standards.		Noted. Provisions for fine-flavor cocoa are incorporated into this code of practice.	Noted Our unique Caribbean situation was address in different areas such as, 16.3, 13.9.2 Add new sub clause for Biosecurity for tourism-based economies. New 4.3.4 Where cocoa production activities interact with tourism, agri-tourism or other visitor activities, the producer or organisation should identify and manage biosecurity risks associated with the movement of visitors, vehicles, equipment, plant material and other potential pathways for the introduction or spread of pests, diseases or invasive organisms. Appropriate controls should be implemented proportionate to the identified risk.

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RTS C				Include clause on women in the cocoa industry			Accepted New clause 17.6 added to include 'diversity, equity and inclusion'. New text - The organisation should promote gender equality, diversity, equity and inclusion in its employment practices, working conditions, training, participation, advancement and other activities relevant to its operations and value-chain relationships. Organisations should consider opportunities to strengthen the participation of women, youth and underrepresented groups in leadership, decision-making, entrepreneurship, technical roles, producer organisations and value-chain development.

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MS comments Template

QF003 Reference #: CQ/2026/0276b	Document: DCRCP 12: 202x – Cocoa – Good Agricultural Practices
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MB1	Clause No./ Subclause No./ Annex / Figure / Table	Line Number	Type of com- ment 2	Comment (justification for change) by the MB	Proposed change by the MB	Consultant's Feedback	RTC observations on each comment submitted
TT			GE	The markets – The products have to compete favourably in bean-to-bar market segment and the niche boutique market segment and should stand out against competition from other regions. The standards should reflect the unique comparative advantages of the region that sets us apart. The current standards seem to be copy and paste from standards of others.		Noted	Noted The unique comparative advantages of the region is addressed in Clause 16.3, Identity preservation for fine flavour cocoa.
TT			GE	Economic sustainability demands high levels of profitability (good agricultural practices in cultivation for improved productivity and risk mitigation to reduce losses), reduced cost of production through better recycling and improved mechanisation, higher quality, consistency of quality, sustainability and innovative products to fetch higher premium prices as well as going up the value chain and shortening the value chain.		Noted,,but that topic is treated in the VSS for Cocoa and cocoa products	Noted Address in the VSS. Add 4.3.1 h) opportunities for appropriate mechanisation Also add to the end of sentence in 4.1.1 ' as well as opportunities for mechanisation'.
TT			GE	Environmental sustainability is key given the small land areas exposed to soil erosion, given the tourism sector the value chains can be shortened to reduce the carbon footprint (improved through carbon sequestration and carbon capture opportunities). Climate smart practices are key both to compensate for dry spell as well as flooding.		Noted..... but that topic is treated in the VSS for Cocoa and cocoa products	Noted Section 6.5 addresses the issues linked to soil erosion and the other aspects are covered under the VSS updated draft.

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TT			GE	Social sustainability – Most cocoa growing areas exist within rural environments where social services are less available. The region is not exposed to vulnerabilities such as kidnapped labour, child labour or poor labour conditions as in cocoa producing regions from other regions. However, there are problems of youth and women unemployment. Social proofing the cocoa sector and linking to opportunities within the rural communities is necessary to create employment and good rural livelihoods.		Noted..... but that topic is treated in the VSS for Cocoa and cocoa products	Noted 17.1.2 h) i) and j) and 17.4.2 i) address issues around labour.
TT			GE	The standards should be supported by indicators and scoring systems with means of verification. The standards should provide beyond yes no categories a scale of scoring which would allow continuous improvement of farms.	Include indicators and a scoring systems with means of verification.	Scoring systems are best suited for certification scheme.	Noted A certification body can independently develop a certification scheme.
TT			GE	ISO 34101 mentioned as source for production of sustainable and traceable cocoa beans. However this standard is absent from bibliography.	Include ISO 34101 to bibliography if it was used. If not, then this standard should be used as a reference.	Accepted.	Noted The standards are mentioned in the foreword of this standard.
TT			GE	The best practices have to based on research, no reference to all the work that has been done in the region has been made. There is so much of research over the past century.	In references and best practices from the Caribbean and reference all material.	A bibliography/references section will be added	Accepted A bibliography was included with Caribbean references.

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