

MS comments Template

QF003 Reference #: CQ/2026/0276a	Document: DCRS 87: 202x – Voluntary Sustainability Standard for cocoa products and chocolate – Requirements
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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
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TT			GE	This starts with good manufacturing practices. This should have been a separate document as it doesn't have to do with sustainability, by its definition.	Have a separate document for good manufacturing practices and remove from this standard.	GMPs have been included because many cocoa product producers produce chocolate or other cocoa products without using proper safety and hygiene practises. GMPs were considered as minimum requirements to maintaining operations and production i.e remaining in business.	Accepted The updated draft removed the requirements for Good Manufacturing Practices and stated it as an exclusion to the draft. Good manufacturing practices is listed as one of the prerequisite to the standard. See clause 4.6. Also in 4.6.3 include a note to the CRCP 5 standard on food hygiene.
TT			GE	This draft doesn't really look at the environmental standards and social sustainability standards based on priorities for the Caribbean. There has been considerable research done on sustainability in the Caribbean and there is no reference to any of the work.	More research required to include sustainability in the Caribbean.	Noted. These documents will be reviewed.	Accepted The updated draft includes requirements related to the environment in Clause 7 and sustainability in Clause 6.2 and Annex B based on the Caribbean context. The Bibliography has also been updated to include some of the research documents related to environment and sustainability in the Caribbean.

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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.	Revise the scope to ensure there isn't a overlap. Each standard should have clear objectives	This scope is related cocoa products and chocolate. Unsure of which two standards are being referred to.	Accepted The scope was updated and the objectives were identified and outlined in the scope. The exclusions were also included.
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.	Reorganise the sections to improve clarity.	Noted. This will be a decision of the Committee.	Accepted The standard was updated and defined sections were identified. 5 sections outlined – 1. Responsible business, sourcing and operational resilience 2. People, livelihoods and communities 3. Environment and climate resilience 4. Origin, identity, heritage and responsible communication; and 5. Evidence, monitoring and sustainability claims.
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.	Standard need to reflect Caribbean realities.	Noted. The scale has been reflected and small producers have not been tasked with impossible requirements. However, the standard requires producers to step up to meet it and not be changed to accommodate the least able producer.	Accepted The Caribbean realities were considered in the updated draft across all sections.

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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.	Consider including requirements that addresses these potential risks.	This scope of this standard does not include production of cocoa beans.	Accepted The updated draft addresses under 7.9, Climate risk assessment and adaptation. The concerns on the potential risk in the Caribbean were outlined in a note under this clause.
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.	Highlight the unique heritage and innovative capacity of the Caribbean.	Noted. This can be better done by linking the product to a Brand or Mark which can reflects the unique heritage, quality and flavour of Caribbean cocoa products and chocolate.	Accepted The updated draft addresses this in Section 8.5. The note also addresses the evidence that needs to be provided to address the appropriate claim.
RTS			TE	5.5.1 – Change should to shall 5.5.2 – Change sustainability services to sustainability performance to match the term defined.			Accepted

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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.		Unsure of the requested change. A sustainability standard seeks to enable a producer to demonstrate social, economic and environmental responsibility, in this case, in the production of cocoa products and chocolate. The requirements will often be similar to other sustainability standards, however the responses may differ depending on the producer.	Partially Accepted The updated draft addresses the unique comparative advantages of the region and niche marketing in section 8. Section 8 addresses identity preservation, origin, cocoa identity, source, authenticity and differentiation.
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.		Unsure of the requested change.	Noted. The updated draft addresses economic sustainability in section 5, especially in 5.2 and 5.1.

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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.	Include Climate smart practices to environmental sustainability.	This scope of this standard does not include production of cocoa beans. Climate smart actions for the production of cocoa products and chocolate have been covered.	Noted The updated draft addresses environmental concerns in Section 7. In the cocoa industry, there isn't a climate smart formal practices, however there is a climate adaptation series by ISO which is generic and can be used across various industries. Include a note to ISO 14090 series under clause 7.9.3.
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.		Unsure of the requested change.	Noted The updated draft addresses social sustainability in clause 6. Clause 6 covers child labour, gender equality and other social issues surrounding employment, people, livelihoods and communities.

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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.	Noted. However, this may not be required since the standards covers requirements for micro and small sized producers as well as requirements for larger producers. As the small producers scale up they can aim to achieve requirements developed for the larger producers.	Addressed in Clause 10. Clause10 and Annex E has been updated to address the implementation framework and conformity assessment.
TT			GE	The best practices have to be 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.	This is a requirements standard and not a Code of Practise. Unclear as to the requested change.	Accepted The bibliography was updated to include all the references.
JM	Committee representati on	pp.vi - vii	GE	Jamaica and Belize are both identified in the Foreward as CARICOM cocoa-producing Member States, but neither is represented in the RTSC or on the Working Group 1.	Invite Jamaican and Belizean participation before finalising the standard or consider rephrasing not linking both the CARICOM Member States.	No involvement in the Committee representation.	Noted At CROSQ every member states is given the opportunity to participate in the development of regional standards.

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RTS C		Introducti on	TE	The RTSC recommended that the standard should provide guidance on the use of the terms 'shall', 'should' and 'may'.			Accepted Include to Introduction – In this Regional Standard, the following verbal forms are used: — “shall” indicates a requirement; — “should” indicates a recommendation; — “may” indicates a permission; — “can” indicates a possibility or a capability. Information marked as “NOTE” is for guidance in understanding or clarifying the associated requirement.

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HT	Foreword		TE	Objective: Decolonize the historical narrative of Caribbean cocoa and establish the indigenous heritage as the official foundation of our comparative advantage.	Proposed Text: "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 1 st paragraph of the Foreword 'Caribbean cocoa reflects a rich heritage shaped by Indigenous knowledge, traditional practices and generations of regional cultivation and processing'. Included: Cocoa has longstanding economic, social and cultural importance within the Caribbean Community (CARICOM). Caribbean cocoa reflects a rich heritage shaped by Indigenous knowledge, traditional practices and generations of regional cultivation and processing. The Region's cocoa and chocolate sector includes micro and small enterprises, community-based processors, cooperatives and larger manufacturers operating under diverse island and mainland conditions.

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JM	Scope: paras 1 and 4 and exclusion list	p.3	ED	The scope is duplicated. The opening statement “This standard establishes the requirements for basic food safety practices and sustainability measures for cocoa products and chocolate in CARICOM Member States”. Same sentence appears after the exclusion list a to c.	Delete the duplication and merge into a single scope statement and one exclusion list.	Accepted.	The scope was updated. However, the foreword and the scope both mentions the 5 sections. The 5 sections would be mentioned in the foreword and reworded for inclusion in the scope. Scope inclusion - It addresses the interrelated economic, social, environmental, resilience and integrity dimensions of sustainability, as further developed through the five main clauses of this standard.
TT		Pg.1	TE	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.	Accepted. Added to Bibliography, 10 and 11.
HT	5.1.1.1	—	TE	Rural land tenure in Haiti and several CARICOM states is predominantly informal or based on customary usage. Strict requirements for formal legal land registry titles could unfairly exclude smallholder coconut farmers from entering the sustainability framework.	Modify text: "Document the name and purpose of the organization and maintain documentation which indicates it is a legal entity, if registered, or holds recognized legal or customary rights to cultivate the land with coconuts and produce coconut products..."	This Clause does not exist in the Cocoa standard.	Not applicable This comment is not applicable to the cocoa standard. It seems to be relevant to the Coconut standard.

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HT	5.2.3.1	—	TE	Smallholder producers in developing economies often face resource constraints that prevent immediate full compliance with all sustainability and governance criteria. A phased implementation approach will facilitate inclusion without lowering quality standards.	Add Subclause 5.2.3.1.1: "For micro and small-scale producers, a progressive/phased compliance pathway (e.g., entry-level, intermediate, and full certification) may be defined to allow gradual capacity building."	This Clause does not exist in the Cocoa standard.	Not applicable This comment is not applicable to the cocoa standard. It seems to be relevant to the Coconut standard.
HT	5.4.1.2 f)	—	TE	Coconut husk and shell valorization (coir, biochar, compost) is vital for soil health and renewable energy in Haiti. However, small processors lack technical equipment (pyrolysis units, shredders) to implement circular economy practices without regional support.	Add Note to 5.4.1.2 f): "Note: Implementation of circular economy technologies such as biochar production may be supported through regional technical assistance and capacity-building programs."	This Clause does not exist in the Cocoa standard.	Not applicable This comment is not applicable to the cocoa standard. It seems to be relevant to the Coconut standard.
HT	5.4.2.5	—	TE	Testing of wastewater and effluent requires access to accredited laboratory infrastructure (ISO/IEC 17025), which is costly or limited in some Member States.	Modify text: "...All testing and treatment of wastewater shall be done in accordance with national regulations, if applicable, or through recognized regional testing bodies, and shall be documented."	This is 8.2 'should' (f) in the Public comment version. This is a 'should' it is not must and would only be done if it is possible and the producer wants to show a higher level of compliance.	Partially accepted This comment is not applicable to the cocoa standard. It seems to be relevant to the Coconut standard. However the updated draft addresses wastewater testing in clause 7.3.

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HT	6.2.2 / 6.2.4	—	TE	Third-party audits and certification fees represent a major financial barrier for individual small farmers. Group certification mechanisms should be explicitly recognized under the CARIBBEAN Sustainability Product Mark framework.	Add Subclause 6.2.7: "Group certification shall be permissible for small-scale producer organizations or cooperatives operating under a centralized Internal Control System (ICS)."	This Clause is related to Training in the Cocoa standard. The Sustainability Mark is not included in this standard. However, I accept that Producer Group certification would be a lower cost option for Caribbean cocoa product producers.	Partially accepted This comment is not applicable to the cocoa standard. It seems to be relevant to the Coconut standard. Even though this comment is intended for the coconut standard, the updated draft makes recommendations in the Annex on the group or collective approach that can be utilised.
TT	6.4.7	Pg. 14	TE	Indicate acceptable terms for cocoa type or those that are to be excluded e.g. Forastero. There is no indication as to how the type or variety is being objectively identified.	Include the acceptable terms for cocoa type or those that are to be excluded.	Accepted.	Noted. This standard does not establish detailed requirements for primary cocoa production, harvesting, fermentation, drying or cocoa-bean quality. Those matters are addressed in other CARICOM standards such as CRCP 12, Cocoa - Good Agricultural Practices.

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HT	6.4		TE	Regulatory Traceability and Prerequisite Compliance Objective: Protect Caribbean exports against non-tariff barriers (e.g., EUDR) by linking factory certification to agronomic excellence.	Insertion Point: Section 6.4 (Traceability) - Add a new clause 6.4.8 (Raw Material Compliance). Proposed Text: "For a product to make claims of 'Sustainability', 'Specific Origin', or 'Fine Flavour' (reference Annex B), the processing entity must maintain records demonstrating that the incoming bean lot: a) Has passed a documented physical and sensory evaluation protocol prior to processing. b) Originates from agroforestry systems continuously evaluated by a structured agro-environmental audit framework. c) Originates from geolocated plots strictly adhering to the zero-deforestation criteria of the destination market."		Partially Accepted The updated draft addresses the following areas: Evaluation protocol (a) Addressed in Clause 8.3. Agroforestry systems (b) – Addressed in Clause – 7.8, 9.7 and 7.11 Zero-deforestation criteria (c) – This requirement is specific to the EUDR regulation and may not apply in other territories. We want to ensure that the standard is applicable to all territories. However, Annex D addresses deforestation and land use and provides recommended evidence to support such a claim.

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HT	7.6.7		TE	Protection of Heritage (Folklore and Practices) Objective: Prevent cultural appropriation by foreign industries by making our traditional practices technically auditable.	Insertion Point: Clause 7.6.7 (Community narratives and estate folklore) Proposed Text: "The use of ancestral agricultural techniques or historical narratives for marketing purposes must be made auditable through the strict cross-referencing of farm records (e.g., traceability of intervention dates for adherence to lunar cycles). These records constitute the only valid historical and geographical proof to protect the region's authenticity."		Partially Accepted The updated draft addresses sustainable heritage and culture in clause 8.5

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SR	7.6 Local communities (new 7.6.8)		TE	Clause 7.6.7 requires community narratives to be truthful and evidence-based, but it does not explicitly prevent social washing. In practice, a processor may claim that it ‘supports’, ‘empowers’ or ‘invests in’ a community, farmer group or supplier when the relationship consists only of an ordinary purchase of raw materials or semi-finished products at the agreed price. Such wording can mislead consumers by implying an additional contribution to business or community development, benefit-sharing or risk-sharing that has not occurred. The standard should distinguish a factual sourcing claim from a claim of community support or social impact and require verifiable evidence of a benefit beyond the normal commercial transaction.	insert a new subclause 7.6.8 before the current 7.6.8 and renumber the current 7.6.8 as 7.6.9: 7.6.8 Producers shall not claim or imply that they support, empower, invest in, partner with or generate additional benefits for a local community, farmer, cooperative or other supplier solely on the basis of purchasing cocoa, cocoa products, raw materials, semi-finished products or services under an ordinary commercial transaction. Such claims shall be made only where the producer provides a clearly identified benefit beyond payment for the goods or services purchased and maintains verifiable evidence of that benefit. Additional benefits may include premium payments, financial or technical investment, capacity building, infrastructure, long-term business development support, fair benefit-sharing or risk-sharing arrangements. NOTE A factual statement that cocoa or another input is sourced from an identified community, farmer, cooperative or supplier is not, by itself, evidence of community support, empowerment, partnership or social impact.	Noted, this is a decision for the Committee. However usually to verify the requirements of a standard, actual evidence is requested by an auditor. So a producer cannot claim to ‘support’ or ‘empower’ or ‘invest’ in a community or a supplier without proof of this. Therefore, minutes of community meetings with the producer present would be required as proof of the involvement in community-based activities, proof of monies spent on community agreed projects or funding of other projects agreed and supported by communities.	Accepted The updated draft was adjusted and the requirements from 6.9 ‘Community claims, partnership and shared benefits was merged with clause 9.8 ‘Social and community claims’ to create a new 9.8. Clause 6.9 was deleted. Annex A.2 checklist point 13 also highlights community and social claims. New 9.8 9.8 Social and community claims 9.8.1 Claims concerning community support, empowerment, livelihood improvement, social investment or similar benefits shall identify the nature of the benefit and be supported by appropriate objective evidence. 9.8.2 The organisation shall not claim or imply that it supports, empowers, invests in or generates additional benefits for a community, farmer group, cooperative or supplier solely on the basis of an ordinary commercial purchase.
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							NOTE: Additional benefits may include technical assistance, capacity building, infrastructure, premium or incentive arrangements, long-term business-development support, benefit-sharing or risk-sharing. 9.8.3 Such claims shall be made only where an identifiable benefit beyond normal payment for goods or services is provided and verifiable evidence is maintained. NOTE: Evidence may include documented training, technical assistance, infrastructure support, premiums or incentives, benefit-sharing arrangements, long-term development activities or other identifiable benefits beyond the normal commercial transaction.
TT	B.5	Pg. 25	TE	“variety, clone, hybrid or cocoa type information, where known”. There is no indication as to the objective determination. Can a name be forwarded without any support?		Unsure of the requested change.	Accepted The updated draft addresses cocoa-identity information in clause 8.3.

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TT	B.7	Pg. 26	TE	In the document, where support is required, the user is usually provided with examples of suitable records. However, in several places the producer is advised to have “appropriate evidence” but examples of suitable records or how to obtain same is not provided. See pg. 26 B.7 for example.		Evidence was present.	Partially accepted The updated document makes references to International, regional and national research and documents that can be utilised to obtain additional information and provide support where necessary. Also there have been notes that provide examples of evidence and Annex A has been updated to include in a table format, examples of simple evidence.
TT	B.11	Pg. 27	TE	Origin Preferable wording: consider using 'Made [exclusively]' to give producers wording for single pure origin	Use 'Made [exclusively]'	Accepted.	Partially accepted A definition for 'origin' was provided in clause 3.10, and further guidance given in clause 8.3. cocoa-identity information.

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2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial
NOTE Columns 1, 2, 3, 4, 5 are compulsory.

MS comments Template

QF003 Reference #: CQ/2026/0276a	Document: DCRS 87: 202x – Voluntary Sustainability Standard for cocoa products and chocolate – Requirements
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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
MB ¹	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 Feedback	RTC observations on each comment submitted
HT			TE	Axis F: Food Sovereignty, Health, and Intra-CARICOM Value Addition Objective: Counter the export bias of the current texts by protecting local processors and stimulating the regional trade of products with high nutritional value.	Proposed Text: "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 aspects of deforestation were included in the draft under clauses 7.8, 7.9 and Annex D and buyer requirements in 4.2. The updated draft addresses the Caribbean context and it also considers the MSMEs within the Caribbean as well. MSMEs are defined in 3.8. MSME's are also mentioned in clause 4.3. Annex A has a checklist for MSMEs

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