

MS comments Template

QF003 Reference #: CQ/2026/0242a	Document: DCRS 88: 202x – Voluntary Sustainable Standards for Coconuts and Coconut Products - 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 comment ²	Comment (justification for change) by the MB	Proposed change by the MB	Consultant Feedback	RTC observations on each comment submitted
TT	Whole document	N/A	ge	Many provisions use non-auditable expressions such as 'consider', 'aim to', 'where possible', 'should', 'suitable', 'adequate' and 'relevant' without criteria. A requirements standard intended for certification must distinguish mandatory requirements from recommendations and identify objective evidence.	Review every provision. Use 'shall' for requirements and 'should' only for recommendations. Where flexibility is necessary, require a documented, risk-based justification and define the minimum evidence expected.	To do. Require agreement from the committee.	Correction to be made throughout document.
GD	Committee Representation	17	ed	Error in spelling of Committee Member Name for Grenada.	Change from McSwen to Mc Ewen	Agreed. Change accepted.	Accepted
GD	Committee Representation	17	ed	Organization Representing to be added to Document next to country representing	Donnet's Enterprise- Grenada	Change accepted.	Accepted
TT	Foreword, p. 1	N/A	te	The Foreword states that the standard is divided into three sections and that achievement of the core areas permits progression, but the normative text does not identify Section 1, Section 2 or Section 3, define 'core areas', or establish progression levels.	Change sector to Clauses	To do.	Accepted Foreword will be changed.
TT	Foreword, p. 1	N/A	te	The statement that a conforming producer can declare a product sustainable conflicts with Clause 6, which requires certification before use of the product mark. It also risks an unqualified sustainability claim where only selected criteria or part of the supply chain has been assessed.	To review the statements /requirements related to the Caribbean sustainability product mark. This certification scheme does not exist. The section /clause should be rewritten to state in an informative manner that the standards can be used to support a certification scheme related to VSS	To do. Need agreement from the committee.	Accepted Sustainability mark to be removed from document. Mark to be developed subsequently to support a certification scheme related to VSS.

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TT	Foreword, p. 1	N/A	ed	The text calls the document a 'Code of Practice', although it is identified and drafted as a requirements standard. The source list also mixes normative references, background sources and private certification schemes.	Replace 'Code of Practice' with 'standard'. Move indispensable documents to Clause 2 and all informative sources to the Bibliography. Verify the current editions and titles of every reference before publication.	Agreed. COP removed and Standard inserted. ISO reference moved to Bibliography. The Private standards remain as source documents though not normative references.	Accepted Replacement of Code of Practice Not Accepted ISO and Private Standards to remain in both the foreword and bibliography as ISO standards are sited in the definitions remain as source documents though not normative references.
TT	Contents, p. ix	N/A	ed	The contents list ends at Clause 4 and omits Clauses 5 and 6 and the Bibliography.	Update the contents to include all clauses, subclauses, annexes and the Bibliography, with correct page numbers.	To do.	Accepted

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TT	1 Scope	N/A	te	The scope uses future tense ('will define') and does not clearly state the conformity-assessment object, supply-chain boundary or whether the standard applies to farms, producer groups, collectors, processors, packers, traders and brand owners.	Replace the first sentence with: 'This document specifies requirements for the sustainable production, collection, processing, packing, storage and traceability of coconut and coconut products by individual operators and producer groups in CARICOM Member States. It also provides guidelines for claims and use of a certification scheme related to sustainability.	Agreed Change accepted.	Partially accepted. The scope has been updated to read: This standard specifies requirements for the sustainable production, collection, processing, packing, packaging, storage and traceability of coconut and coconut products by individual operators and producer groups in CARICOM Member States. The standard applies to: Dry coconuts and water coconuts and products of processed coconut including but not limited to copra, desiccated coconut, coconut water, coconut milk/cream and coconut oil, including virgin coconut oil. This standard does not apply to: Coconut plants Non-food coconut products, Other products where the coconut is used only as a flavouring

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TT	1 Scope	N/A	te	The product coverage is incomplete and ambiguous. 'Fresh and dry coconuts', 'water coconuts' and 'products of processed coconut' are not defined, and it is unclear whether copra, virgin coconut oil, refined oil, coconut water, milk, cream, flour, sugar, coir, shell products and other non-food co-products are included.	Insert a scope table listing the included product categories and applicable life-cycle stages. At minimum, distinguish mature nuts, tender nuts for coconut water, copra, desiccated coconut, coconut water, coconut milk/cream and coconut oil, including virgin coconut oil. State explicitly whether non-food products and co-products are included or excluded.	The standard was written for food products and by-products of coconut. Non-food or non-food byproducts were not considered. I do not think this standard requires the distinction of mature or tender nuts and believe that dry and fresh water coconuts and food products of processed coconuts can suffice. However, we breakdown of processed products can be developed.	See updated scope above.
TT	1 Scope, exclusions	N/A	te	Excluding 'coconut plants' may unintentionally remove nurseries and planting-material controls from the assessed supply chain, although planting material is a major pathway for regional pests and diseases and determines long-term resilience. To discuss whether nurseries and planting material should be excluded.	Clarify that plants sold as products are outside the scope, but planting material and nurseries are subject to the relevant sourcing, phytosanitary, varietal-identity and record requirements.	To do. Guidance required.	See updated scope above. All coconut plants are excluded from the scope of this standard.

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TT	2 Normative references	N/A	te	One general hygiene code is insufficient for the broad range of products in the scope. Product safety and quality cannot be assessed consistently without the relevant Codex commodity and hygiene texts. To confirm whether requirements should be included for the products mentioned in the scope	Add, as applicable and using current designations: CXC 1-1969, General Principles of Food Hygiene; CXC 4-1971, Code of Hygienic Practice for Desiccated Coconut; CXS 177-1991, Standard for Desiccated Coconut; CXS 210-1999, Standard for Named Vegetable Oils; CXS 240-2003, Standard for Aqueous Coconut Products - Coconut Milk and Coconut Cream; CXS 1-1985, General Standard for the Labelling of Pre-packaged Foods; and the applicable national or regional coconut-water and virgin-coconut-oil standards.	To do. Should these be added to Normative references if not mentioned in the document. Unclear as to where these should be added.	Partially Accepted
TT	2 Normative references	N/A	ed	The heading 'CROQS Standards' is a typographical error, and the status/designation of CRCP 5 should be verified.	Change 'CROQS Standards' to 'CROSQ standards' and verify the exact reference number, title, edition and current status of CRCP 5.	Change accepted and made, but still need to verify the designation of the CROSQ standard.	Accepted Spelling updated. Not Accepted Number and title for CRCP 5 are correct.

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TT	3 Definitions	N/A	te	Key terms that determine the scope and audit outcome are undefined. This creates inconsistent interpretation between farms, processors and certification bodies.	Add definitions for: approved supplier; certification scope ; chain of custody ; coconut; coconut product; competent authority; core requirement; group certification ; hazardous work; identity preserved ; internal management system; lot/batch; mass balance ; operator; processor; producer; producer group; rework; segregation; smallholder ; sustainability claim; and tender coconut .	Definitions found. To be added to document once agreed by committee.	Partially Accepted Only those terms used in the document can be defined.
TT	3.3, 3.10, 3.15 and 3.19	N/A	ed	The source is cited as ISO 26000:2018, but the published edition is ISO 26000:2010. In addition, ISO 26000 uses 'interested party' in some contexts; all copied definitions should be verified against the cited source.	Correct the source to ISO 26000:2010 and verify the wording and term name for each definition against the authorised source text.	Change accepted, this was a typo. All copied definitions related to ISO 26000:2010 have been verified as correct. Unclear as to the reference to 'Interested party'.	Accepted
TT	3.6 ethical behaviour	N/A	ed	The entry is not written as a definition, the word should be removed and the definition reworded. Also, there is a missing closing bracket in the source citation.	Replace the entry with the noun-phrase definition from the cited source, without 'should', and close the source citation correctly.	Change accepted. New definition added.	Partially Accepted Definition updated to read: behaviour based on the values of honesty, equity and integrity and showing concern for people, animals and the environment and a commitment to address the impact of activities and decisions on stakeholders' interests

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TT	3.8 food fraud	N/A	ed	The phrase 'misinterpretation of food' appears to be an error and changes the meaning of the recognised definition, which refers to misrepresentation.	Replace 'misinterpretation' with 'misrepresentation' and verify the complete definition against the current cited source.	This the correct definition from the cited source. If another is preferred and recommended, it can be used.	Accepted
TT	3.14 specification s	N/A	ed	The source 'ISO Standards Terms and Glossary' is not a traceable bibliographic reference, and the term is plural while the definition is singular.	Change the term to 'specification' and cite a complete, verifiable source reference, or remove the source statement if the definition is drafted specifically for this standard.	Agreed. Change accepted. New definition found and added. Source removed	Accepted
TT	3.16 sustainability	N/A	ed	The source is incorrectly identified as ISO 82:2019. The publication is ISO Guide 82:2019, Guidelines for addressing sustainability in standards.	Change the source designation to 'ISO Guide 82:2019' and verify the quoted wording.	Agreed. Change accepted.	Accepted
TT	3.17 traceability	N/A	te	A definition alone does not establish the one-step-back/one-step-forward information, lot linkage or quantity reconciliation needed to substantiate a product-level sustainability claim.	Retain the definition and add normative traceability and chain-of-custody requirements under Clause 5.2, including unique lot identification, supplier and customer linkage, transformation records, quantity reconciliation, claim status and recall testing.	Definition retained. Additional requirements placed in Clause 5.2.	Accepted
JM	4.1		ge	Addition	Ensure that debris that may cause harm/injuries are removed from the orchard before and after a storm or hurricane	Included in 5.4.1.2 d	Accepted Included in 5.4.1.2 d

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TT	4.1	N/a	ed	Addressing best production practices: Change to production requirements since this standard is a requirements standard.	Change the subclause heading 'Addressing Best Production Practices' to 'Production requirements', and use consistent normative language ('shall') throughout, since this is a requirements standard.	Change accepted. Changing shalls' still to be addressed. .	Partially Accepted Heading updated. Normative language will be addressed throughout.
TT	4 and 5, general	N/A	te	The standard applies the same documentation burden to an individual smallholder and an industrial processor. This is likely to exclude micro-enterprises without improving sustainability outcomes.	Add a proportionality clause permitting simplified documented information for smallholders and micro-enterprises, provided that all core outcomes and traceability are demonstrated.	This can be addressed by putting in 'Shalls' for core requirements and 'Shoulds' for more complexed requirements.	Partially Accepted Will be addressed throughout but there is not need for an explicit proportionality clause.
TT	4.1.1.1	N/A	te	Site-history review alone is insufficient. Caribbean coconut production is affected by coastal salinity, waterlogging, drought, wind exposure, erosion, contaminated land and competing land uses.	Replace with: 'Before establishing or replanting a production unit, the producer shall assess and document land tenure and prior use; soil type, drainage and fertility; slope and erosion risk; water availability and quality; flooding, storm surge, salinity, drought and wind exposure; contamination; biodiversity value; community use; and access to harvesting and emergency services. Identified risks shall be controlled and periodically reviewed.'	Agreed. Change accepted.	Accepted Land tenureship is covered in 5.1.1.1.

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TT	New 4.1.1.2 - Planting material	N/A	te	There is no requirement for healthy, true-to-type and locally adapted planting material. Movement of palms and seed nuts can spread serious regional pests and diseases, while varietal diversity is important for resilience and product quality.	Insert: 'Planting material shall be obtained from identified and, where available, registered or officially recognised sources. Records shall identify the source, cultivar or population, date and production unit. Material shall comply with national phytosanitary requirements and be inspected for pests and disease. Selection shall consider local adaptation, intended product, drought, wind and salinity tolerance, pest and disease response, yield and genetic diversity.'	Agreed. Change accepted.	Noted Reference is made to the GAP Code of Practice
TT	New 4.1.1.3 - Soil and plantation managemen t	N/A	te	The draft contains no auditable requirements for soil conservation, ground cover, drainage, nutrient cycling, intercropping or replanting of senile and storm-damaged palms.	Insert requirements for a risk-based soil and plantation management plan covering soil testing where justified; organic matter; mulching; erosion control; drainage; ground cover; appropriate intercropping/agroforestry; nutrient recycling; prevention of soil compaction; removal or safe management of severely diseased or hazardous palms; and a phased replanting plan where productivity or resilience has materially declined.	Agreed. Change accepted.	Noted Reference is made to the GAP Code of Practice

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TT	4.1.1.2 irrigation	N/A	te	The requirement does not specify how irrigation-water risks are assessed or controlled, especially where water may contact harvested nuts or food-contact surfaces.	Require identification of the water source, intended use and application method; an initial and risk-based periodic assessment of microbiological, chemical and salinity hazards; protection of the source; maintenance of irrigation equipment; and corrective action where water is unsuitable. Testing frequency shall be based on risk, law and customer requirements.	Agreed. Change accepted.	Noted Reference is made to the GAP Code of Practice
TT	4.1.1.3 fertilisers	N/A	te	Recording fertiliser use does not demonstrate efficient or safe nutrient management. Excessive or poorly timed application can contaminate water and increase cost and emissions.	Require a nutrient-management plan based on crop stage, expected yield, soil or leaf information where available, nutrient content of organic inputs and risk to water. Records shall include product, source, date, location, rate, method and applicator. Manure and other organic inputs shall be treated and applied to control food-safety and environmental hazards.	Agreed. Change accepted.	Noted Reference is made to the GAP Code of Practice
DM	4.1.1.4		te/ed	What consists of plant protection products?	Suggest including plant protection products in definitions.	Definition found and added.	Accepted

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TT	4.1.1.4 plant protection products	N/A	te	The provision does not require integrated pest management, legal approval, label compliance, pre-harvest intervals, maximum residue limits, calibration or safe disposal.	Replace with an integrated pest-management requirement prioritising prevention, surveillance, sanitation, resistant or tolerant material and biological or mechanical controls. Where pesticides are necessary, require national registration, label compliance, trained applicators, calibrated equipment, pre-harvest and re-entry intervals, applicable destination-market MRLs, secure storage, spill controls and lawful disposal of containers and obsolete products .	Agreed. Change accepted.	Noted Reference is made to the GAP Code of Practice

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TT	New 4.1.1.5 - Pest and disease surveillance	N/A	te	Pests and diseases are a major regional production and biosecurity risk, but the draft contains no surveillance, reporting or phytosanitary response requirement.	Insert: 'The producer shall monitor for locally regulated and economically important pests and diseases and maintain inspection and action records. Suspected regulated pests or unusual symptoms shall be reported to the competent authority. Control measures shall follow official advice and integrated pest-management principles.' Add an informative note citing examples relevant to the Member State, such as lethal-yellowing-type diseases, red palm mite, coconut mite, palm weevils/red ring disease and bud or crown rot.	Agreed. Change accepted.	Noted Reference is made to the GAP Code of Practice

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TT	4.1.1.5 harvest and post-harvest	N/A	te	The requirement is too general for coconut. Product safety and quality depend on maturity, intended use, handling of fallen nuts, prevention of contamination and safe harvesting from tall palms.	Require documented criteria for maturity and intended product; clean harvest tools and containers; segregation of diseased, damaged, germinated or contaminated nuts; rules for use of naturally fallen nuts based on product and hazard assessment; protection from soil, animals, fuels and chemicals; prompt transfer to processing; and controls for climbing, mechanical harvesting and falling-nut hazards.	Agreed. Change accepted.	Noted Reference is made to the GAP Code of Practice
TT	4.1.2.1	N/A	te	Referencing selected clauses of a general hygiene code does not require a complete hazard analysis or recognise the very different processes for coconut water, copra, desiccated coconut, milk/cream and oil.	Require processors to implement good hygiene practices and, where applicable, a HACCP system consistent with the current CXC 1-1969 and relevant product codes. The hazard analysis shall cover raw-material acceptance, process flow, biological, chemical and physical hazards, preventive controls, critical limits where applicable, monitoring, corrective action, verification and records.	Agreed, Change accepted.	

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TT	New 4.1.2.6 - Coconut oil	N/A	te	The standard does not distinguish virgin, crude and refined coconut oil or require controls for identity, oxidation, moisture, free fatty acids, contaminants and processing conditions.	Insert requirements for coconut oil that distinguish virgin, crude and refined grades. Require identity and quality criteria appropriate to the declared grade (e.g. free fatty acid content, moisture, peroxide value), controls to prevent oxidation and rancidity during storage and transport, exclusion of solvent residues and contaminants for cold-pressed/virgin claims, and control of processing conditions (e.g. temperature, filtration and refining steps).	Agreed, Change accepted.	Not Accepted The following clause was added: Where coconut product standards exist, those must be used in conjunction with the VSS

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TT	New 4.1.2.7 - Packaging and labelling	N/A	te	Packaging and label controls are missing even though sustainability, origin and product identity claims will appear on consumer and trade packs.	Insert requirements that packaging be suitable for intended use, food-contact compliant where applicable, protected from contamination and selected to minimise material use without compromising safety. Labels and accompanying documents shall comply with law and accurately state product identity, lot, origin where claimed, storage conditions, date marking and certified sustainability scope. Allergen and cross-contact information shall meet destination-market requirements.	Agreed, Change accepted.	Accepted
DM	4.1.3.1		ed	The word “of deliberate” has no impact on this sentence. Whether contamination is accidental or deliberate doesn’t change that a product is contaminated. The word is superfluous; reduces the conciseness of the clause.	Remove “...of deliberate...”	Not agreed. This clause refers to food defence, involving security of food and drink and their supply chains from all forms of malicious attack, leading to contamination. This is referring to deliberate contamination.	Accepted

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TT	4.1.3.1 food defence	N/A	te	A full food-defence plan may be disproportionate for a small farm, while the current wording provides no minimum control for higher-risk processors.	Require a documented food-defence assessment proportionate to the operation, considering access, vulnerable processing and storage points, water and ingredient security, personnel and contractor access, tamper evidence, incident reporting and plan review. Permit a simplified checklist for low-risk smallholders.	Agreed. Change accepted.	Partially Accepted There is no need to list the risks as they may vary from operation to operation.
TT	4.1.3.2 food fraud	N/A	te	The provision focuses on purchased materials but does not address coconut-specific authenticity risks or sustainability-claim fraud.	Require a vulnerability assessment covering substitution or dilution of coconut oil; misstatement of virgin, cold-pressed, organic or origin status; addition of water or undeclared ingredients; false sustainability status; lot-document alteration; and mixing of certified and non-certified material. Controls and verification shall be proportionate to the identified risk.	Agreed. Change accepted.	Partially Accepted There is no need to list the assessments as they may vary from operation to operation.

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DM	4.1.3.4		te/ed	What is meant by “reworked” here? Reworked indicates any nonconforming product that is corrected so that it meets original specified products. This may encourage non- compliance to the standard.	“Re-processed’ may be a more accurate term.	Reworked is related to how non-conforming product is treated. Re-processed indicated further or additional processing is required. I ‘Re-worked product’ as a non-conforming product was the subject of the Clause. Further advice needed on change.	Clause rephrased
DM	4.1.3.4		te/ed	If this clause is to address non-conforming products then it should be more comprehensive	Ensure that any nonconforming product is reworked, reprocessed, or otherwise dispositioned is appropriately recorded and does not pose any risk to product safety, human health, the community, or the environment.	Advice on re-processed product required.	See above
TT	4.1.3.4 rework	N/A	te	The current guidelines does not control rework identity, age, quantity, allergen status or incorporation limits and does not prevent use of unsafe or non-certified material.	Replace with: 'Rework shall be identified, protected, traceable and used only under documented conditions that maintain product safety, legality, quality and certification status. The operator shall define acceptance criteria, maximum holding time, permitted product and quantity, authorisation and records. Nonconforming or recalled products shall not be used as rework unless lawfully and demonstrably reconditioned.'	Agreed. Change accepted.	See above

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MS comments Template

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TT	New 4.1.4 - Nonconformi ng product, withdrawal and recall	N/A	te	The draft does not require control of nonconforming products, customer complaints, withdrawal or recall. These are essential where a sustainability mark is applied to food products.	Insert guidelines for identification and segregation of nonconforming products; evaluation and authorised disposition; complaint investigation; notification of affected customers, the certification body and competent authorities where required; a documented withdrawal/recall procedure; periodic traceability and recall testing; and corrective action.	Agreed. To add.	Agreement that there is a need for control of nonconforming product withdrawal and recall See updated clause
JM	5.1		ge	Addition	Ensure that staff and management are trained in corporate governance and industry standards in how to operate	Agreed. To add.	Not Accepted Covered in other clauses with Clause 5.
TT	5.1.1.1	N/A	te	The clause conflates legal identity, land rights and protected areas. 'No protected lands should be used' is vague and may not address customary tenure, community access, buffer zones or legally permitted activities within different protected-area categories.	Require the operator to demonstrate legal identity where registration is required, legal or legitimate right to use the land, and respect for documented customary and community rights. New planting or expansion shall not occur in contravention of protected-area, forest, wetland, coastal-zone or land-use law. Any dispute shall be recorded and addressed through a fair grievance process.	Agreed. To add.	Partially Accepted Clause is updated to address tensureship.

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TT	5.1.1.2 and 5.1.1.3	N/A	te	A formal management structure and individual job descriptions for every worker are disproportionate for family farms and seasonal micro-enterprises. However, responsibilities still need to be clear.	Replace with: 'The operator shall assign and communicate responsibility and authority for applicable requirements. Roles may be documented in an organisation chart, role description, contract, job letter, producer-group rules or other form appropriate to the size and complexity of the operation. Workers shall have access to the information relevant to their role in a language and form they understand.'	Agreed. To add.	Not Accepted Already covered in clause
TT	5.1.2	N/A	te	The requirement for a business plan is not scaled and does not require measurable sustainability objectives, cash-flow resilience or preparation for crop recovery after hurricanes and disease outbreaks.	Require a documented plan proportionate to the operation, including production and market objectives, expected costs and revenue, maintenance and replanting, resource needs, key risks, disaster recovery, product and market diversification where appropriate, succession or continuity arrangements, measurable sustainability objectives and periodic review. Permit a simplified template for smallholders.	Agreed. To add.	Noted Included in clause.

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TT	5.1.2.1	N/A	te	An operator cannot comply directly with every 'relevant international law'. International instruments may require national implementation, while export-market and customer requirements depend on the product and destination.	Replace with: 'The operator shall identify, have access to and comply with applicable national and local legal requirements and permits. Applicable importing-country legal requirements and agreed customer requirements shall be identified and met for products placed on those markets.'	Agreed. To add.	Not Accepted The existing clause captures the relevant information and requirements.
TT	5.1.3 to 5.1.3.2	N/A	te	Annual engagement with all stakeholders and 'stakeholder oversight of the business' are undefined and may be impractical or interfere with management accountability. The draft also lacks a mechanism for affected persons to raise concerns.	Require the operator to identify stakeholders affected by significant impacts, prioritise them by risk, and engage them at a frequency and in a manner appropriate to the impact. Establish an accessible, confidential and non-retaliatory grievance mechanism, record concerns and responses, and communicate relevant outcomes. Do not require stakeholders to exercise management oversight.	Agreed. To add.	Accepted
TT	5.1.4 to 5.1.4.2	N/A	te	The clause does not cover family labour, contractors or seasonal workers, and 'competency requirements ... should be met' is not a requirement.	Require sufficient competent persons, including family workers, seasonal workers and contractors, for activities affecting safety, legality, quality and sustainability.	Agreed. To add.	Accepted

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DM	5.1.5		ed	This sentence is a mouthful and the flow is a bit clumsy	Confirm that management demonstrates its commitment by accepting accountability for the safety of coconut and coconut products, minimizing the environmental impacts of its operations, and considering the social and economic impacts of the business on the community, other businesses, and relevant stakeholders.	Agreed. To add.	Accepted
TT	5.1.5	N/A	ed	The sentence is grammatically incomplete ('by management commitment')	Replace with: 'Top management or the responsible operator shall demonstrate commitment and accountability by approving the sustainability policy and objectives, providing resources, assigning responsibilities, reviewing performance, addressing nonconformities and communicating the importance of meeting this standard.'	Agreed. To add.	See above
DM	5.2		ed	"5.2" is not bolded and therefore inconsistent with formatting of the other clause values.		Agreed. Change accepted.	Accepted
TT	5.2.1.1 to 5.2.1.4	N/A	ed	The subclauses are sentence fragments.	Revise the clause numbering accordingly.	Agreed. Change accepted.	Accepted
DM	5.2.2		ed	Inconsistent font type		Agreed. To do.	Accepted

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TT	5.2.2	N/A	te	'Optimise productivity' is not measurable, and the provision could encourage yield increases without considering input efficiency, losses, product quality or ecosystem limits.	Add a note The operator should establish indicators appropriate to its activities, such as, marketable nuts per palm or hectare, processing yield, product losses, water and energy intensity, rejection rate, downtime and worker productivity. Improvement actions shall not compromise safety, labour rights, soil health, biodiversity or product quality.	Agreed. To add.	Not Accepted
TT	5.2.2 d)	N/A	te	Training workers 'to attract young people and women' is unclear and may be interpreted as a training outcome imposed on individual employers rather than inclusive sector development.	Replace with: 'The operator shall provide equitable access to recruitment, training, skills development and advancement, including for women and young adult workers, without assigning hazardous work to persons under 18 years of age.'	Agreed. However, the gender specificity was questioned in the Webinar. This will be adjusted to encompass as young males as they are also very vulnerable in CARICOM societies.	Partially accepted See updated clause

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TT	5.2.3.1	N/A	te	Mandatory signed contracts for every purchase may be impractical in spot markets, while requiring an individual price to 'allow for a living income' is not objectively verifiable without a benchmark and shared-responsibility method.	Require written or otherwise verifiable transaction terms covering product, quantity, quality, certification status, price or pricing method, deductions, delivery and payment. Payments shall be accurate and timely. Require the operator to assess risks to producer income, avoid abusive trading practices and implement documented improvement actions where it has leverage. Define any living-income methodology and benchmark in scheme rules.	Agreed. To add.	Not Accepted Sufficient information is captured in the existing clause
DM	5.2.3.3		te/ed	“Having an agreed method...” - this is vague and can be strengthened to reflect the language of a quality management system.	“Having an agreed and documented process for resolving conflicts and/or disagreements in a fair, timely and transparent manner.	Agreed. To add.	Accepted

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TT	New 5.2.4 - Economic resilience	N/A	te	The economic pillar lacks requirements addressing dependence on a single buyer or product, ageing plantations, price volatility and recovery after severe weather or pest outbreaks.	Insert a proportionate requirement to assess material economic risks and plan responses. Measures may include phased replanting, product or market diversification, intercropping, value addition, cooperative services, access to finance or insurance, emergency reserves, maintenance of critical equipment and continuity arrangements with suppliers and buyers.	Agreed. To add.	Not Accepted. Areas covered in 5.1.2
GY	5.2.3.4		te	We recommend traceability' should lead back to the original coconut plant population which is protectively important in terms of geographical indicator rights. The point here is that the standard may not be practically complete if it does not apply to: 'coconut plants'.		To be determined by the Committee.	Noted
TT	5.3.1.1 a)	N/A	te	'Payment of National Insurance provisions' is country-specific terminology and is not applicable in the same form in every CARICOM Member State. The provision also omits equal and timely payment to temporary and piece-rate workers. Rewrite in a more general manner	Require regular, timely and fully documented payment of at least the applicable minimum wage, including lawful overtime, leave, statutory deductions and social-security contributions	Agreed. To add.	Clause adjusted

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TT	5.3.1.1 b)	N/A	te	Hard-coding 8 hours per day and 40 hours per week may conflict with differing national laws, collective agreements and agricultural work arrangements. Rest, overtime consent and fatigue risk are not addressed. Rewrite in a more general manner	Replace the fixed figures with compliance with applicable law or collective agreement, whichever gives greater worker protection. Require recorded working time, rest and meal breaks, at least one regular rest day, voluntary overtime within legal limits, correct overtime pay and controls for fatigue and heat stress.	Agreed. To add.	Clause adjusted
TT	5.3.1.1 c) and 5.3.3.1	N/A	te	A universal minimum age of 16 does not reflect differing national minimum ages, and the text does not clearly prohibit hazardous work for all persons under 18. Coconut harvesting, climbing, machetes, dehusking machinery, pesticides and heavy loads can be hazardous. Rewrite in a more general manner	Require compliance with national minimum-age law and ILO Convention No. 138 principles. No person under 18 shall perform hazardous work, including climbing tall palms, working beneath active harvesting, operating dangerous cutting or dehusking equipment, handling pesticides, carrying unsafe loads or working at night, unless a lawful protected training exception applies. Age verification shall respect privacy.	Agreed. To add.	Clause adjusted
DM	5.3.3.1		ge/te/ ed	Does child labour only occur at the end of the supply chain? Why not no child labour throughout the supply Chain? Additionally this seems contradictory to 5.3.1.1c	“Child labour throughout the life cycle of coconut production”	Agreed. To add.	Accepted

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TT	5.3.3.1	N/A	te	The child-labour prohibition is limited to the raw-material production end of the chain, leaving processing, packing, transport and subcontracted activities outside the requirement.	Apply the child-labour prohibition to all activities within the operation and to contracted or supplied activities where the operator has control or influence. Require risk-based supplier due diligence and remediation that protects the child rather than causing abrupt loss of essential support.	Agreed. To add. Similar to above comment.	See above
TT	5.3.3.2	N/A	te	The forced-labour examples are incomplete and do not address recruitment fees, withheld identity documents, debt bondage, deposits, restricted movement or threats.	Expand the forced-labour prohibition to address recruitment fees charged to workers, retention of identity or travel documents, debt bondage, compulsory deposits, restriction of movement or confinement, and threats or coercion. Require verification that recruitment practices and contracts are free of these indicators.	Agreed. To add.	Clause updated
DM	5.3.3.3		ge/te/ ed	“...open but discreet..” is ambiguous - open and discreet seem to pull in opposite directions	“An accessible and confidential reporting system should be established to enable workers and other relevant parties to report concerns without fear of retaliation	Agreed. To add.	Accepted

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DM	5.3.3.4		ge/te/ ed	“Gender inequality” describes a problem rather than a requirement. The wording of this clause should be more inclusive and better aligned with the language of Labour standards, and management systems, similar to 5.3.3.3.	Ensure equal opportunity and non-discrimination in employment, such as equal pay, equal opportunities for advancement and professional development, and protection of workers’ rights during pregnancy and breastfeeding.	Agreed. To add.	Accepted See updated clause
TT	5.3.3.4	N/A	te	The wording treats gender inequality only as a women’s employment issue and does not address facilities, harassment risk, decision-making, parental responsibilities or collection of data needed to detect unequal outcomes.	Require equal opportunity, equal remuneration for work of equal value, safe and suitable facilities, maternity and parental protections required by law, reasonable arrangements for pregnancy and breastfeeding, prevention of gender-based violence and harassment, and participation in decisions affecting work. Monitor relevant outcomes while protecting personal data.	Agreed. To add. Similar to above comment.	Accepted See updated clause
DM	5.3.3.5		ge/te/ ed	“Workplace violence” describes a problem rather than a requirement.	Violence, harassment (of any kind), and intimidation in the workplace shall not be tolerated. Records of all reported incidents shall be maintained and reviewed to support timely investigation, corrective action, and prevention of recurrence.	Agreed. To add.	Accepted See updated clause

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TT	5.3.3.5 and 5.3.3.6	N/A	te	Keeping records only of physical infractions is too narrow and may compromise victims' privacy. The clauses do not require investigation, protection, remedy or escalation.	Combine the clauses into a prohibition of violence, threats, bullying, sexual harassment and other harassment. Establish confidential reporting, prompt impartial investigation, protection from retaliation, proportionate action, support and remedy. Restrict records to authorised persons and retain them in accordance with law and privacy requirements.	Agreed. To add.	Accepted See updated clause
DM	5.3.3.6		ge/te/ed	“...open but discreet..” is ambiguous - open and discreet seem to pull in opposite directions. Ambiguity should not exist when discussing harassment of any kind.	Combine this clause with 5.3.3.5	Agreed. To add. Similar to above comment.	Accepted See updated clause

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TT	5.3.4	N/A	te	Several fixed controls, such as a trained first aider on site for the full day and a designated officer or committee, may be disproportionate, while the underlying occupational-risk-management process is not specified.	Require a documented occupational health and safety risk assessment proportionate to the workforce, tasks and sites; legal compliance; hierarchy of controls; competent supervision; safe equipment; PPE as a last line of control; welfare facilities; first-aid coverage appropriate to risk and response time; emergency arrangements; worker consultation; and periodic review.	Agreed. To add.	Partially Accepted See updated clause
TT	5.3.4 and 5.3.5	N/A	te	The draft does not identify characteristic coconut-sector hazards, so audits may overlook the activities associated with the most serious injuries.	Add an informative or normative hazard list, as appropriate, covering falling nuts and fronds; tree climbing and work at height; machetes and cutting tools; dehusking, grating, pressing and centrifuge machinery; boilers and hot oil; electrical and LPG systems; vehicles; pesticides; dust, noise and vibration; manual handling; slips; heat and solar exposure; insects and snakes; lone work; and public access beneath palms. Require controls based on risk.	Agreed. To add.	Not Accepted Risks should be assessed by the producer/operator
DM	5.3.5.1		ed	“... that may be of high risk...” The word “of” seems superfluous.	“...that may be high risk..”	Agreed. To change.	Accepted

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DM	5.3.5.1		ed	“..., and develop mitigating actions to be taken, to reduce the health and safety risk...” - conciseness	“...and develop actions to mitigate and reduce health and safety risks.”	Agreed. To change.	Accepted
TT	5.3.5.2	N/A	te	Incident recording alone does not require investigation, treatment of near misses, statutory notification or emergency preparedness for hurricanes, fire, chemical spills and serious injury.	Require reporting and investigation of injuries, occupational illness, dangerous occurrences and significant near misses; identification of root causes; corrective action; legal notification where required; trend review; and emergency plans, drills and contact arrangements proportionate to credible emergencies.	Agreed. To add.	Accepted See updated clause
DM	5.3.6		ed	The wording is awkward.	“...Engage respectfully with local communities and, following appropriate consultation contribute to local development by:”	Agreed. To add.	Accepted
DM	5.3.6.1		ed	The phrase “mitigating against” seems a bit redundant; mitigate already indicates there is an action against something.	“Assess the potential legal, social, economic, environmental, and cultural impacts of its operation on the local community, with particular consideration of vulnerable groups. Where any adverse impacts following an impact assessment are identified, appropriate measures should be taken to mitigate such events.	Agreed. To add.	Accepted

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TT	5.3.6.1	N/A	te	The community-impact requirement is broad but does not address land access, water competition, pesticide drift, traffic, odour, noise, falling-nut exposure, cultural heritage, vulnerable groups or community grievances.	Require a risk-based assessment of significant community impacts, including land and resource rights, water use, spray drift, wastewater, smoke and odour, noise, traffic and road safety, public exposure to falling nuts, cultural heritage and emergency effects. Consult affected groups, establish a grievance channel and implement mitigation and remedy.	Agreed. To add.	Partially Accepted See updated clause
DM	5.3.6.2		ed	The wording of this clause should be more inclusive and better aligned with the language of Labour standards, and management systems.	“Promote local employment by providing training and employment opportunities with particular emphasis on members of underserved populations.	Agreed. To add.	Accepted
TT	5.3.6.2 to 5.3.6.4	N/A	te	Training local residents, joining civil-society groups and buying locally may be beneficial but are not universally applicable or objectively auditable requirements. Mandatory group membership can also conflict with freedom of association.	Change to recommended measures under a requirement to identify feasible contributions to local development. Examples may include local employment and skills development, local purchasing, support for producer organisations, youth and women's enterprise development, community safety, and preservation of coconut heritage. Do not require membership in any organisation.	Agreed. To add. Similar to above comment.	Partially Accepted Examples do not need to be listed

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GD	5.4		Te	Section encourages circularity in waste management but overlooks consumer-facing circular economy practices such as refillable container systems for retail coconut oil. This model is practical, cost-effective, and environmentally sound for micro-producers	This section be expanded to recognise refill retail models and provide basic hygiene guidance for producers wishing to adopt them.	This information was not provided to the consultant. Agreed to take on board.	
JM	5.4		ge	Addition	Ensure an employee /consultant is responsible for maintaining the established product standards, along with environmental requirements	Advice needed on this comment.	
TT	5.4.1.2	N/A	te	The waste list is technically unclear. 'Green husks and shells from freshwater production and consumption' should refer to tender-coconut-water operations, and 'water from the oil extraction process' does not adequately identify high-organic-load effluent from wet processing, milk or cream production.	Revise the inventory to cover tender and mature husks, shells, fibre and coir dust, rejected nuts and kernels, copra residues, coconut-water losses, oil-processing residues, coconut milk/cream and wet-process effluent, wastewater-treatment sludge, packaging, used oil, chemicals and pesticide containers. Require quantities to be measured or credibly estimated at a frequency proportionate to the operation.	Agreed. To add.	Partially Accepted See updated clause
DM	5.4.1.2d		ed	Unnecessary prepositions reduces conciseness	“Employee training in waste reduction”	Noted.	Partially Accepted Consider stem sentence

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DM	5.4.1.2e		ed	These two subclauses should be merged. Clause 5.4.1.2e can be the overall objective and a sub clause to reflect what should be contained in the waste management plan. Additionally for flow and sequence, the main clause (5.4.1.2) should be first (5.4.1.1): 5.4.1.2f should be 5.4.1.2a	Clause 5.4.1.2e: “Developing a waste management plan that incorporates the best use of resources to reduce, recycle, re-use or minimise waste where possible.	Will review.	Accepted
DM	5.4.1.2f		ed		Sub Clause of 5.4.1.2e: This plan should promote circularity where appropriate including but not limited to potential use of coconut husks for coir (fibres for rope, mats and brushes), as planting medium, as biochar (a source of renewable energy) and as soil amendment (green husks and shells).	Will review.	Not Accepted See updated merged clause
TT	5.4.1.2 f)	N/A	te	Biochar is described as a source of renewable energy. Biochar is principally the stable carbon-rich solid from pyrolysis; combustible gases or oils from the conversion process may provide energy. Uncontrolled burning or poorly designed pyrolysis can create smoke, fire, worker and air-pollution risks.	Correct the example to distinguish direct energy recovery from shells or husks, pyrolysis energy products, biochar as a potentially useful soil amendment, and coir products. Require legal, technically controlled conversion; air-emission and fire controls; safe feedstock; product-quality criteria for food, feed or soil uses; and prohibition of uncontrolled dumping or open burning except where specifically lawful and risk controlled.	Agreed. To add.	Not Accepted See updated merged clause

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TT	5.4.2.1 and 5.4.2.4	N/A	te	Measuring the exact quantity and quality of all water and wastewater may be impractical for rain-fed smallholders and micro-processors. Conversely, the clause lacks efficiency indicators and action thresholds for significant users.	Require identification of water sources and uses and measurement or credible estimation of significant withdrawals and discharges. Monitoring frequency and parameters shall be risk-based. Significant users shall establish a baseline, relevant efficiency indicators and improvement actions. Simplified records may be used for low-use smallholders.	Agreed. To add.	Partially Accepted See updated section
DM	5.4.2.2		ed	This clause seems unrealistic. How is a farmer to assess climate change?	Remove this clause and infer about the concept as has been done in Clause 5.4.2.3	Will re-word clause.	Partially Accepted See updated section
TT	5.4.2.2, 5.4.2.3 and 5.4.2.6	N/A	te	The water-management provisions mention abundance and scarcity but omit intense rainfall, flooding, storm surge, saltwater intrusion, erosion and contamination of stored rainwater, all relevant to Caribbean operations.	Require the water-management plan to address drought, competing demand, extreme rainfall, flooding, storm surge, saltwater intrusion, source contamination and interruption of supply. Measures may include protected rainwater harvesting, drainage, soil-moisture conservation, efficient irrigation, safe storage, backflow prevention, emergency potable-water supply and recovery procedures.	Agreed. To add.	Partially Accepted See updated section

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GD	5.4.3.1		Te	Section states that pricing should allow for a living income for coconut producers, but this remains aspirational without a benchmark, reference point, or enforcement pathway.	The standard should reference regional wage frameworks and consider developing a CARICOM fair price reference for raw coconuts at the farm gate level to protect primary producers.	Will review. This should be under 5.2.3.1.	See updated clause in 5.2.3.1
TT	5.4.3.1 and 5.4.3.4	N/A	te	The environmental assessment is too general and does not establish minimum practices for soil, riparian areas, wetlands, wildlife habitat, agroforestry and ecosystem services.	Require identification of significant environmental aspects and protection of natural ecosystems, watercourses and riparian vegetation; prevention of erosion, sedimentation and pollution; retention or restoration of appropriate ground cover and habitat; responsible management of invasive species; and maintenance or enhancement of on-farm biodiversity through locally appropriate mixed cropping, agroforestry or habitat measures.	Agreed. To add.	Partially Accepted See updated section
GD	5.4.3.2		Te	Requires producers to assess the impact of climate change on operations but provides no practical tools for micro-producers in Small Island Developing States who lack the technical and financial capacity to conduct formal risk assessments.	Simplified templates and linkages to technical assistance through local Bureau of Standards or agricultural extension services would make this requirement achievable.	Agreed. To add.	Partially Accepted See updated section

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TT	5.4.3.2 and 5.4.3.5	N/A	te	The climate-change clauses are duplicative and omit the main operational resilience measures needed for Caribbean tree crops and processing sites.	Combine them into a climate-risk and resilience requirement covering hurricanes and high winds, drought, heat, intense rainfall, flooding, landslides, coastal exposure, sea-level rise, salinity, pest and disease shifts, power loss and supply-chain disruption. Require prioritised adaptation actions, responsibilities, timelines, emergency preparedness and periodic review after significant events.	Agreed. To add.	Partially Accepted See updated section
TT	5.4.3.3	N/A	te	'Documenting potential deforestation issues' does not prohibit unlawful or material ecosystem conversion, and 'restocking considerations' is undefined. A clear land-conversion and replanting rule is needed.	Replace with requirements that expansion and replanting comply with land-use law and shall not cause unlawful deforestation or conversion of protected or high-biodiversity natural ecosystems. The operator shall document land-cover history for new production areas, retain evidence of approvals, protect required buffers, and use a planned approach to rehabilitation and replanting of existing coconut land. If a cut-off date is adopted by the scheme, define it and the evidence required.	Agreed. To add.	Partially Accepted See updated section

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TT	5.4.4	N/A	te	Training and two-year records alone do not control chemical risk. The provision also calls fertilisers 'agrochemicals (hazardous and non-hazardous)', which may obscure different storage and handling controls.	Separate fertiliser, pesticide, cleaning-chemical, fuel and processing-chemical controls. Require legal approval, current safety information, inventory, secure and compatible storage, labels, restricted access, trained handlers, PPE, spill and fire response, application/use records, empty-container and obsolete-chemical disposal, and inspection. Retention shall follow law, certification-cycle and traceability needs and shall not be limited automatically to two years.	Agreed. To add.	Not Accepted Fertilisers are considered agrochemicals
TT	5.4.5.1	N/A	te	A baseline limited to electricity and fossil fuels excludes biomass, purchased heat, refrigerants and relevant outsourced processing or transport. Absolute reduction can penalise growing businesses even when efficiency improves.	Require identification and monitoring of significant energy sources, including electricity, fuels, biomass and purchased energy. Establish both absolute and activity-based indicators where relevant, such as energy per 1 000 nuts or per tonne of product. Set feasible objectives and actions without encouraging unsustainable biomass harvesting.	Unsure if this is what the requirements was looking for. The aim was to attempt to reduce the use of unsustainable energy sources and try to replace this with renewable energy sources.	Partially Accepted See updated section

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TT	5.4.5.2	N/A	te	Requiring every operation to generate renewable electricity on site is not feasible for many smallholders and processors. Biochar itself is not an electricity-generation technology.	Replace with: 'The operator shall evaluate technically, environmentally and economically feasible options to reduce fossil-energy dependence. Options may include efficiency, solar energy, sustainably sourced biomass, biogas, recovery of energy from controlled coconut-residue processing, or purchase of renewable electricity. Decisions and significant environmental or safety risks shall be documented.'	Agreed. To add.	Partially Accepted See updated section
TT	5.4.5.4	N/A	te	'Calculating Greenhouse Gas emissions' does not identify organisational boundaries, sources, emission factors, reporting period, treatment of biogenic carbon or verification. Results would not be comparable and could support misleading carbon claims.	Require a documented and consistently applied method appropriate to the operation, with defined boundary, base period, material sources, activity data, emission factors, assumptions and recalculation rules. Permit a simplified recognised calculator for small operators. Any carbon-neutral, reduced-carbon or sequestration claim shall be separately substantiated and shall not rely on unverified estimates.	A simple method would suffice for most CARICOM producers and processors. Agreed. To include.	Not Accepted Proposed change is prescriptive and, in some cases, not applicable to the standard. Existing clause reviewed and updated

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MS comments Template

QF003 Reference #: CQ/2026/0242a	Document: DCRS 88: 202x – Voluntary Sustainable Standards for Coconuts and Coconut Products - Requirements
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TT	5.4.5.5	N/A	te	A formal energy policy with multiple plans may be disproportionate for farms and micro-enterprises and duplicates the proposed sustainability objectives and management-review process.	Require documented energy objectives, responsibilities and actions proportionate to significant energy uses. Allow these to be integrated into the overall sustainability or business plan rather than requiring a separate policy for every operator.	Agreed. To add.	Partially Accepted See updated section
GD	6		Te	Section requires internal audits, formal applications, and external audits, creating significant financial and administrative barriers that effectively exclude micro and artisan producers.	A simplified or graduated pathway, potentially including peer-review or community-verified compliance at the initial tier, would democratise access to the mark and support grassroots sustainable production across CARICOM.	To be decided by the Committee, if left in the document.	Section removed

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TT	6, general	N/A	te	Clause 6 mixes requirements for the applicant, certification body and scheme owner. The standard cannot be applied consistently without scheme rules defining ownership, eligibility, evaluation, decision, surveillance, appeals, suspension, withdrawal and control of claims. This standard cannot be used to create an obligation for a NSB to establish this certification scheme.	Separate operator requirements from scheme-owner and certification-body rules. CARIBBEAN Sustainability Product Mark certification scheme aligned with ISO/IEC 17067 would have to be developed. Given that this scheme does not exist , the clause should be removed or rewritten . Also “shall “cannot be used under clauses entitled “Guidelines” .The scheme shall define scope, application, evaluation methods, sampling, certification decision, licence, surveillance, renewal, complaints and appeals, public information, suspension, withdrawal and misuse.	To be decided by the Committee, if left in the document.	Section removed
TT	6.1	N/A	te	Shall cannot be used in a clause called “guidelines”.	Rewrite this clause or remove.		Section removed
TT	6.2	N/A	te	Shall cannot be used in a clause called “guidelines”.	Rewrite this clause or remove.		Section removed

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TT	6.2.2	N/A	te	'Obtain a suitable score' is not auditable because no score, weighting, threshold or nonconformity rule is provided. Internal-audit competence and impartiality are also unspecified.	Define the conformity model in a normative annex or scheme document. Identify mandatory requirements, any scored improvement criteria, passing threshold, evidence, major and minor nonconformities, conditions that preclude certification and closure times. Require competent internal auditors who do not audit their own work where practicable; provide a group-internal-inspection method for smallholders.	To be decided by the Committee, if left in the document.	Section removed
TT	6.2.3	N/A	ed	The organisation's name is misspelled as 'CROQS', and the application route may vary by Member State and appointed certification body.	Change 'CROQS' to 'CROSQ' and state that the current application process and authorised certification bodies shall be obtained from the scheme owner or the relevant National Standards Body.	To amend typo. To be decided by the Committee, if left in the document.	Section removed
TT	6.2.4	N/A	te	The clause requires an external audit but does not require an impartial certification decision or competent certification body. An audit alone does not confer product certification. This standard cannot be used to create an obligation for an NSB to develop the product certification scheme.	Delete or Rewrite clause 6	To be decided by the Committee, if left in the document.	Section removed

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TT	Bibliography, item 2	N/A	te	ISO 17023:2021 is incorrectly cited as 'General requirements for third-party marks of conformity'. The relevant publication is ISO/IEC 17030:2021. ISO/IEC TS 17023:2013 concerns duration of management-system certification audits.	Replace item 2 with: 'ISO/IEC 17030:2021, Conformity assessment - General requirements for third-party marks of conformity.'	Noted, correction to be done.	

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