



Fundación para la Conservación y el Uso Sustentable de los Humedales  
*Conservar y restaurar los humedales, sus recursos y biodiversidad para las generaciones venideras*

## POSITION STATEMENT AND RECOMENDATIONS FOR THE RTRS STANDARD FOR RESPONSIBLE SOY PRODUCTION

April 30<sup>th</sup> 2013

### ABOUT FUNDACIÓN HUMEDALES / WETLANDS INTERNATIONAL IN ARGENTINA

The goal of *Fundación para la Conservación y el Uso Sustentable de los Humedales* or **Fundación Humedales** is to “*preserve and restore wetlands, their resources and biodiversity, as a natural and cultural patrimony, through research, information exchange and conservation activities*”. Our long term Vision is “*a world where wetlands are treasured and nurtured for their beauty, the life they support and the resources they provide to society*”.

Fundación Humedales is a non-profit organization legally created in Argentina on 2006. It is part of Wetlands International global network, sharing its goal and working for the integrated management of wetlands and hydric resources, taking into account their range of values and services, protecting its biodiversity and in benefit of the human communities which depend upon them.

Fundación Humedales / Wetlands International works actively on the development of technical capacities and knowledge of industries’ policies and practices affecting wetlands. Through promotion, communication and dialogue, we debate current strategies and policies, mobilizing knowledge and tools relevant for strategic decisions and sustainability criteria.

Fundación Humedales / Wetlands International believes that people’s physical, spiritual, cultural and economic welfare depends on conservations and restoration of wetlands globally. We consider that more attention must be paid to wetlands conservation and wise use in order to contribute to sustainable development. We urge for better governance and coordinated actions from all the sectors of society, to preserve wetlands and their diversity of goods and services for present and future generations.

### SOY AND WETLANDS PROGRAM

Recognizing the importance to our country of the agricultural activity in general and particularly soy production, and at the same time worried about the expansion of the agricultural frontier with consequent loss of native ecosystems, Fundación Humedales created in March 2012 the “Soy and Wetlands Program”, as part of the project **Land planning and capacity building for the sustainable development of the Parana Delta region**<sup>1</sup>.

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<sup>1</sup> The project “Land planning and capacity building for the sustainable development of the Parana Delta region” is framed in the Ecosystem Alliance (EA), result of the collaboration between IUCN National Committee of the Netherlands (IUCN NL), Both Ends and Wetlands International and is sponsored by the Dutch Ministry of International Affairs (DGIS). EA initiative seeks to support and improve the livelihoods of the poor and to create a green and inclusive economy, through participatory and responsible management of ecosystems and their resources.



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The “Soy and Wetlands Program” is oriented to promote the integration of wetlands conservation and wise into the agendas of both public and private sectors as well as in policies related to soybean cultivation and particularly with responsible soy production. To that effect, in May 2012 Fundación Humedales became a member of the Round Table on Responsible Soy Association (RTRS).

Through our participation on the RTRS and its associated Working Groups (High Value Conservation maps Consulting Group, Pesticides Working Group), Fundación Humedales wants to make a concrete contribution in order to achieve that the RTRS Standard for Responsible Soy Production and its associated policies delve their criteria related to wetlands, contributing to its conservation and sustainable use.

The **Soy and Wetlands Program** goal is to incorporate the conservation and wise use of wetlands and water resources into public and private policies of the soy sector and particularly on the Round Table on Responsible Soy (RTRS) guidelines.

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## WETLANDS AND SOYBEAN CULTIVATION

Wetlands are one of the most important environmental goods on Earth. They characterize for their multiplicity and high contribution to global biodiversity, being the base for human survival and development.

Currently, the rate of wetlands’ loss and deterioration is accelerating all around the world and it’s estimated that pressure over these ecosystems will be more intense in the next decades, because of the high global demand of earth and water for agricultural use (food and biofuels) as well as for climate change.

Concern about the loss and degradation of wetlands has increased rapidly during the last years. Nowadays the focus of this concern points to indirect impacts of this ecosystems’ loss and to the deterioration of its functioning, which ultimately leads to the loss of all services for human population.

Particularly, the expansion of soybean cultivation has occurred at the expense of native ecosystems substitution, such as grasslands, forests and wetlands, as well as for the displacement of other productive activities, such as livestock and other cultivations. Native ecosystems’ loss has caused not only direct biodiversity loss, but also soil erosion and salinization, has increased the water table and the risk of flooding due to higher runoff. These processes can affect wetlands surrounding cultivated areas, but they can also have significant effects in more distant areas, including wetlands systems and Ramsar sites.

## AIM OF THIS REPORT

This document is a contribution towards the understanding of the importance that wetlands and their resources have for human kind, providing specific recommendations in order to clarify and delve criteria related to wetlands and water on the RTRS Standard. To that end we have analyzed such Standard and its National Interpretation for Argentina and we have elaborated some observations and recommendations.

Beyond the adjustments that may be done on the Standard, we believe that the RTRS success will depend on the effective implementation of its principles and on the correct verification of its performance by certifier entities. Although this is valid for any aspect of this and other standards,

verification of the criteria related to wetlands management and conservation is complex and requires of specific knowledge.

## OBSERVATIONS / RECOMMENDATIONS

Item	Subject	Section / RTRS Standard Criteria	RTRS Standard Point
A	Wetlands definition	Glossary of Terms	
B	Responsible soy expansion	4.4	4.4.1
C	Biodiversity conservation	4.5	
D	Surface water vs. wetlands	5.1	5.1.1
E	Water monitoring	5.1	5.1.2 (guideline)
F	Irrigation water consumption	5.1	5.1.4
G	Natural wetlands definition	5.2	5.2.3
H	Agrochemicals use	5.6	
I	Water bodies vs. wetlands	5.9	5.9.4 y 5.9.5

### A. GLOSSARY OF TERMS (ANNEX 3)

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**Observation:** We consider that using the definition of wetlands from the Ramsar Convention is correct. However, we want to point out the incomplete translation of such definition in the Glossary of Terms from the RTRS Standard (Annex 3) and on the document on Guidelines for the National Interpretation for Argentina.

**Recommendation:** To correct this mistake on wetlands definition included in the Glossary of Terms of the RTRS Standard and in the document of Guidelines for National Interpretation for Argentina, according to the Ramsar Convention definition:

*“Wetlands are areas of marsh, fen, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six meters.”*

### B. POINT 4.4.1

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**Observation 1:** This point includes a Note which states: *“This criterion will be revised after June 2012 if RTRS-approved maps and system are not available”*. To this respect it is important to revise this criterion, assuring that soy expansion stop being done at the expense of native ecosystems destruction and degradation. We consider that both RTRS policies as well as the Standard report give proper recognition to forests and to deforestation as an impact of irresponsible soy expansion. However, these policies do not incorporate wetlands ecosystems and water accordingly, as a key resource for humans and agricultural production. Wetlands distribution and characteristics should be considered among the criteria used to

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develop a map identifying High Value Conservation Areas vs. potential areas for soy expansion is made, as well as the existence of Ramsar sites and other important wetlands areas for biodiversity conservation.

**Recommendation 1:** To check the criteria and to incorporate specific guidelines for soy expansion not to be done at the expense of destruction and degradation of wetlands ecosystems or of water contamination. If specific maps are developed, criteria for their elaboration must include wetlands distribution and characteristics, revised and adapted to each country.

**Observation 2:** The term **native habitat** is mentioned at least twice. This term is not specific and is not defined on the Glossary of Terms of the RTRS Standard. These are the following:

*4.4.1 After May 2009 expansion for soy cultivation has not taken place on land cleared of native habitat except under the following conditions:*

*...c) In areas that are not native forest (see glossary), expansion into native habitat only occurs according to one of the following two options:*

**Recommendation 2:** To define the term **native habitat** on the Glossary of Terms of the RTRS Standard as wetlands and grasslands ecosystems.

## C. CRITERION 4.5

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**Observation:** This criterion refers to biodiversity conservation through preservation of native vegetation. This vision is very constrained and does not guarantee reaching the objective of the criterion. It is important to mention that biodiversity conservation depends not only on the preservation of native vegetation, but also and principally on the preservation of native ecosystems such as wetlands, grasslands and forests.

**Recommendation:** It is suggested to modify the text on criterion 4.5 and replace it by the following: *“On-farm biodiversity is maintained and safeguarded through the preservation of ecosystems and native vegetation”*. Revise the points related to this criterion accordingly.

## D. CRITERION 5.1 AND POINT 5.1.1

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**Observation:** The term **surface water** is introduced, which indirectly makes reference to wetlands because these ecosystems are where surface water is stored. This is clear in the National Interpretation for Argentina, where surface water is described as “rivers, lakes, lagoons, streams, swamps, marshes”. All of these are wetlands ecosystems according to the Ramsar Convention.

**Recommendation:** To replace the term **wetlands** instead of **surface waters** on the text from criteria 5.1 and in point 5.1.1 from the RTRS Standard. We suggest:

*5.1 The quality and supply of **wetlands** and ground water is maintained or improved.*

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*5.1.1 Good agricultural practices are implemented to minimize diffuse and localized impacts on wetlands and ground water quality from chemical residues, fertilizers, erosion or other sources and to promote aquifer recharge.*

#### E. POINT 5.1.2 (ANEXX 1)

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**Observation 1:** It is not possible to detect levels of agrochemical contamination through the monitoring of parameters such as water pH, temperature, dissolved oxygen, turbidity and electrical conductivity, which should be monitored as said in the point 5.1.1 of the RTRS Standard, where is stated *“to minimize diffuse and localized impacts on surface and ground water quality from chemical residues, fertilizers, ...”*.

**Recommendation 1:** To incorporate the analysis and monitoring of agrochemicals level in water from wetlands and ground waters. To that end, consider potential collaboration with universities and national and provincial research institutes.

**Observation 2:** Monitoring at basin level is mentioned, but it is not clear who is responsible for such monitoring or how it will be organized / implemented when the basin is shared by many producers.

**Recommendation 2:** Monitoring should be done at farm scale, using appropriate monitoring design. For instance, in the case of a stream crossing a farm, monitoring stations may be put at the entrance and exit points, which would show clearly farm input. However, results should be considered at regional scale, thus considering also possible contamination contribution from other productive units.

#### F. POINT 5.1.4

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**Observation:** In order to get the correct evaluation of the implications of water consumption for irrigation, it is advisable that producers do a prior Environmental Impact Assessment.

**Recommendation:** We suggest to modify the text in point 5.1.4 and to replace it for *“Where irrigation is used, there is a prior Environmental Impact Assessment and a documented procedure in place for applying best practices...”* Point 5.1.4 of the criterion is modified accordingly.

#### G. POINT 5.2.3

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**Observation:** This point refers to the term **natural wetlands**. However, this is not defined in the Glossary of Terms of the RTRS Standard. Based on the Ramsar Convention definition –cited as source for the wetlands definition; see Annex 3 of the RTRS Standard–, natural wetlands are those not artificial but human-made. Thus, natural wetlands may be defined as marine and coastal wetlands (Ramsar categories A, B, C, D, E, F, G, H, I, J, K and Zka; see Annex I in this document) and continental wetlands (Ramsar categories L, M, N, O, P, Q, R, Sp, Ss, Tp, Ts, U, Va, Vt, W, Xf, Xp, Y, Zg and Zkb; see Annex I).

**Recommendation:** To define natural wetlands in the Glossary of Terms of the RTRS Standard based on the Ramsar Convention classification for wetland type (see Annex I in this document)

## H. CRITERION 5.6

**Observation 1:** In this criterion of the RTRS Standard, a note is included stating “During the next 3 years, the RTRS will review the use of other chemicals, particularly the following 3 chemicals: Endosulfan (WHO Class II), Paraquat (Class II), Carbofuran (Class Ib)”. To that end, in July 2012 the Pesticide Use Working Group was created, where this criterion was extensively discussed and evidences were collected on Paraquat and Carbofuran toxicity for wildlife (see the table below), which justify strongly to stop using such products and the need to specify such restriction in the RTRS Standard document.

### Toxicity per wildlife group

Pesticide → Group:	Paraquat	Carbofuran	Endosulfan	Glyphosate	Cypermethrin	Chlorpyrifos
Mammals	High	High	High	Low	Moderate	High
Birds	Moderate	High	Moderate	Moderate	Low	High
Fish	Moderate	High	High	Low	High	High
Bees	Moderate	High	Moderate	Low	High	High
Invertebrates	Moderate	High	Nd	Low	High	High
Algae	High	Moderate	Moderate	Low	Moderate	Moderate
Aquatic plants	Moderate	Nd	Nd	Low	High	Nd

Nd= no data

**Recommendation 1:** The use of Carbofuran and Paraquat pesticides should stop by 2015/2016, for what we support WWF proposal done during the Pesticide Working Group of the RTRS:

*Include in Criteria 5.6: Carbofuran and Paraquat have a demonstrated reduced use until elimination in 2015/2016 crop (by RTRS certified producers) or in 3 years from certification;*

### Indicators for 5.6 and 5.4:

- Carbofuran and Paraquat shall only be used in specific and exceptional circumstances as identified in national best practice guidelines.
- If Carbofuran and Paraquat are used, the plan for ICM should include description of the exceptional circumstances where these are used and a plan with targets for elimination of these is implemented till complete elimination of these by 2015/2016 crop or 3 years from certification.

**Observation 2:** Regardless the importance of Integrated Pest Management (IPM) as an alternative for excessive pesticide use, during the work of the Pesticide Working Group, the need to advance in a clear definition of the meaning of IMP for the RTRS was extensively discussed. According to FAO<sup>2</sup>:

*“Integrated Pest Management (IPM) is an ecosystem approach to crop production and protection that combines different management strategies and practices to grow healthy crops and minimize the use of pesticides. IPM programs use current, comprehensive information on the life cycles of pests and their interaction with the environment. This information, in combination with available pest control methods, is*

<sup>2</sup> <http://www.fao.org/tc/exact/sustainable-agriculture-platform-pilot-website/integrated-pests-management/en/>

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*used to manage pest damage by the most economical means, and with the least possible hazard to people, property, and the environment. IPM is not a single pest control method but, rather, a series of pest management evaluations, decisions and controls. In practicing IPM, growers who are aware of the potential for pest infestation follow a four-tiered approach. The four steps include: 1) set Action Thresholds, 2) monitor and Identify Pests, 3) prevention y 4) control“.*

**Recommendation 2:** We consider that the RTRS should develop its own approach / policy regarding Integrated Pest Management. Such policy should include clear criteria to avoid or minimize pesticide impacts over wetlands, water and biodiversity. Consequently, in the frame of that policy, restrictions on pesticide use for those with high toxicity for wildlife and humans should be established.

#### I. POINTS 5.9.4 AND 5.9.5

**Observation:** Both points mention the term **water / water bodies** and the following note is included: ‘*Water bodies’ includes, but is not limited to, water courses, rivers, streams, lagoons, springs, lakes, reservoirs and ditches.* Once again the RTRS Standard makes indirect reference to wetlands (see **Annex I** of this document).

**Recommendation:** To replace the terms **water body** and **water bodies** for **wetlands**.

## ANEX I – ANEX I OF THE RAMSAR INFORMATION SHEET

### Ramsar Classification System for Wetland Type

The codes are based upon the Ramsar Classification System for Wetland Type as approved by Recommendation 4.7 and amended by Resolutions VI.5 and VII.11 of the Conference of the Contracting Parties. The categories listed herein are intended to provide only a very broad framework to aid rapid identification of the main wetland habitats represented at each site.

To assist in identification of the correct wetland types to list in section 19 of the RIS, the Secretariat has provided below tabulation of some of the characteristics of each wetland type for marine and coastal wetlands and inland wetlands.

#### Marine and Coastal Wetlands

- A -- **Permanent shallow marine waters** in most cases less than six meters deep at low tide; includes sea bays and straits.
- B -- **Marine subtidal aquatic beds**; includes kelp beds, sea-grass beds, tropical marine meadows.
- C -- **Coral reefs**.
- D -- **Rocky marine shores**; includes rocky offshore islands, sea cliffs.
- E -- **Sand, shingle or pebble shores**; includes sand bars, spits and sandy islets; includes dune systems and humid dune slacks.
- F -- **Estuarine waters**; permanent water of estuaries and estuarine systems of deltas.



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- G -- **Intertidal mud, sand or salt flats.**
- H -- **Intertidal marshes;** includes salt marshes, salt meadows, saltings, raised salt marshes; includes tidal brackish and freshwater marshes.
- I -- **Intertidal forested wetlands;** includes mangrove swamps, nipah swamps and tidal freshwater swamp forests.
- J -- **Coastal brackish/saline lagoons;** brackish to saline lagoons with at least one relatively narrow connection to the sea.
- K -- **Coastal freshwater lagoons;** includes freshwater delta lagoons.
- Zk(a) -- **Karst and other subterranean hydrological systems,** marine/coastal

### **Inland Wetlands**

- L -- **Permanent inland deltas.**
- M -- **Permanent rivers/streams/creeks;** includes waterfalls.
- N -- **Seasonal/intermittent/irregular rivers/streams/creeks.**
- O -- **Permanent freshwater lakes** (over 8 ha); includes large oxbow lakes.
- P -- **Seasonal/intermittent freshwater lakes** (over 8 ha); includes floodplain lakes.
- Q -- **Permanent saline/brackish/alkaline lakes.**
- R -- **Seasonal/intermittent saline/brackish/alkaline lakes and flats.**
- Sp -- **Permanent saline/brackish/alkaline marshes/pools.**
- Ss -- **Seasonal/intermittent saline/brackish/alkaline marshes/pools.**
- Tp -- **Permanent freshwater marshes/pools;** ponds (below 8 ha), marshes and swamps on inorganic soils; with emergent vegetation water-logged for at least most of the growing season.
- Ts -- **Seasonal/intermittent freshwater marshes/pools** on inorganic soils; includes sloughs, potholes, seasonally flooded meadows, sedge marshes.
- U -- **Non-forested peatlands;** includes shrub or open bogs, swamps, fens.
- Va -- **Alpine wetlands;** includes alpine meadows, temporary waters from snowmelt.
- Vt -- **Tundra wetlands;** includes tundra pools, temporary waters from snowmelt.
- W -- **Shrub-dominated wetlands;** shrub swamps, shrub-dominated freshwater marshes, shrub carr, alder thicket on inorganic soils.
- Xf -- **Freshwater, tree-dominated wetlands;** includes freshwater swamp forests, seasonally flooded forests, wooded swamps on inorganic soils.
- Xp -- **Forested peatlands;** peat swamp forests.
- Y -- **Freshwater springs; oases.**
- Zg -- **Geothermal wetlands**
- Zk(b) -- **Karst and other subterranean hydrological systems,** inland

Note: "floodplain" is a broad term used to refer to one or more wetland types, which may include examples from the R, Ss, Ts, W, Xf, Xp, or other wetland types. Some examples of floodplain wetlands are seasonally inundated grassland (including natural wet meadows), shrublands, woodlands and forests. Floodplain wetlands are not listed as a specific wetland type herein.





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#### **Human-made wetlands**

- 1 -- **Aquaculture** (e.g., fish/shrimp) **ponds**
- 2 -- **Ponds**; includes farm ponds, stock ponds, small tanks; (generally below 8 ha).
- 3 -- **Irrigated land**; includes irrigation channels and rice fields.
- 4 -- **Seasonally flooded agricultural land** (including intensively managed or grazed wet meadow or pasture).
- 5 -- **Salt exploitation sites**; salt pans, salines, etc.
- 6 -- **Water storage areas**; reservoirs/barrages/dams/impoundments (generally over 8 ha).
- 7 -- **Excavations**; gravel/brick/clay pits; borrow pits, mining pools.
- 8 -- **Wastewater treatment areas**; sewage farms, settling ponds, oxidation basins, etc.
- 9 -- **Canals and drainage channels, ditches.**
- Zk(c) -- **Karst and other subterranean hydrological systems**, human-made