



Summary of Standard Comments

The FairTSA Team would like to thank all stakeholders who submitted comments on the new Standard Version 4.2. via email, orally, or on social media.

We herewith share a summary of the comments received and our responses in **bold**.

1. All commenters agreed with the push to make changes to be in full compliance with the EU Directive, especially with the requirement for all partners to be independently certified by an ISO 17065 accredited certification body.
Mandatory certification by an independent ISO 17065 accredited certification body is now part of the standard version 4.2.
2. Several commenters applauded the intention to establish an Advisory Board, and a subset of the comments proposed to include the provisions for the Advisory Board in the standard itself.
The provisions for the Advisory Board are now part of standard version 4.2. The call for Advisory Board applicants will be published around September 15, 2026.
3. Several commenters proposed that we should reference the Directive (EU) 2024/825 (Empco Directive).
The Directive is now referenced in section 3.6.1 of standard version 4.2.
4. Several commentators proposed to specify and include the complaints procedure which is currently only referenced in supporting documents to be included in the standard itself.
The procedure is now part of the standard
5. One commenter proposed making the Inspection & Certification Guide public. This Guide provides commentary to the standard and defines most major noncompliances, and provides procedures for denial, suspension, and revocation of certification. It used to be available for cooperation certification agencies on a password-protected page of the website.
We will make the Inspection & Certification Guide public with the publication of this standard.



6. Several commenters mentioned the strict prohibition of the aforementioned Directive regarding broad and not entirely quantified environmental claims.
We have eliminated terms such as “sustainability” from the standard and will issue a guidance document defining required, prohibited and permitted language for use on product labels and on marketing materials.
7. Several commenters approved the restructured certification eligibility section, and some proposed to make the criteria for ineligibility of certification part of the standard.
The “ineligibility criteria” are now part of the standard.
8. Several commenters proposed restricting the standard to certified organic operations only.
We will make these comments the subject matter of a larger standard revision in 2027.
9. Several commenters requested us to consider an additional standard module covering the EU Deforestation Regulation (EUDR) regarding the prevention of deforestation for specific agricultural products.
We will make these comments the subject matter of a larger standard revision in 2027.
10. We received several comments regarding the complexity of Internal Control Systems procedures and the difficulty of compliance.
We regard this as a systemic problem of all certification systems relying on an Internal Control System (ICS) structure that cannot be solved by stricter standard requirements. We are currently evaluating programs that could support grower groups with managing their ICS in a structured manner, while at the same time alleviating the job of the on-site third party inspector. Once we have found a solution that we regard as practical, feasible and affordable we will publish this on our website, in our newsletter and on social media.