

ISEAL Code of Good Practice: Summary of feedback on the first draft of the Code



May 2023

About this document

This document provides a summary of the feedback on the first draft of the ISEAL Code of Good Practice and how this has informed development of the second draft of the Code. We would like to thank all the respondents who provided feedback on the first draft, and to those who supported the consultation by engaging with events and sharing information about the consultation with colleagues and stakeholders.

For more information on the development of the Code and opportunities for engagement, please see the Code consultation webpage:
www.isealalliance.org/iseal-code-consultation

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Summary of the first round of consultation

About the ISEAL Code of Good Practice

The ISEAL Code of Good Practice is a normative reference that operationalises the ISEAL Credibility Principles.

The Code defines **credible management** of the components **of a sustainability system**, including standard-setting, assurance, claims, and impacts (monitoring, evaluation, and learning).



About the ISEAL Code of Good Practice

The Code revises and integrates the ISEAL **Impacts, Standard-Setting, and Assurance Codes of Good Practice**, and also incorporates essential practices from the ISEAL **Sustainability Claims Good Practice Guide**

The revised and integrated Code was approved by the ISEAL Board in May 2020. Its development is informed by a multistakeholder Steering Group and overseen by the ISEAL Technical Committee.



Public consultation approach

The public consultation on the first draft of the revised and integrated Code ran from 22 September to 16 December 2022. We also recorded and considered feedback submitted up to 16 January 2023.

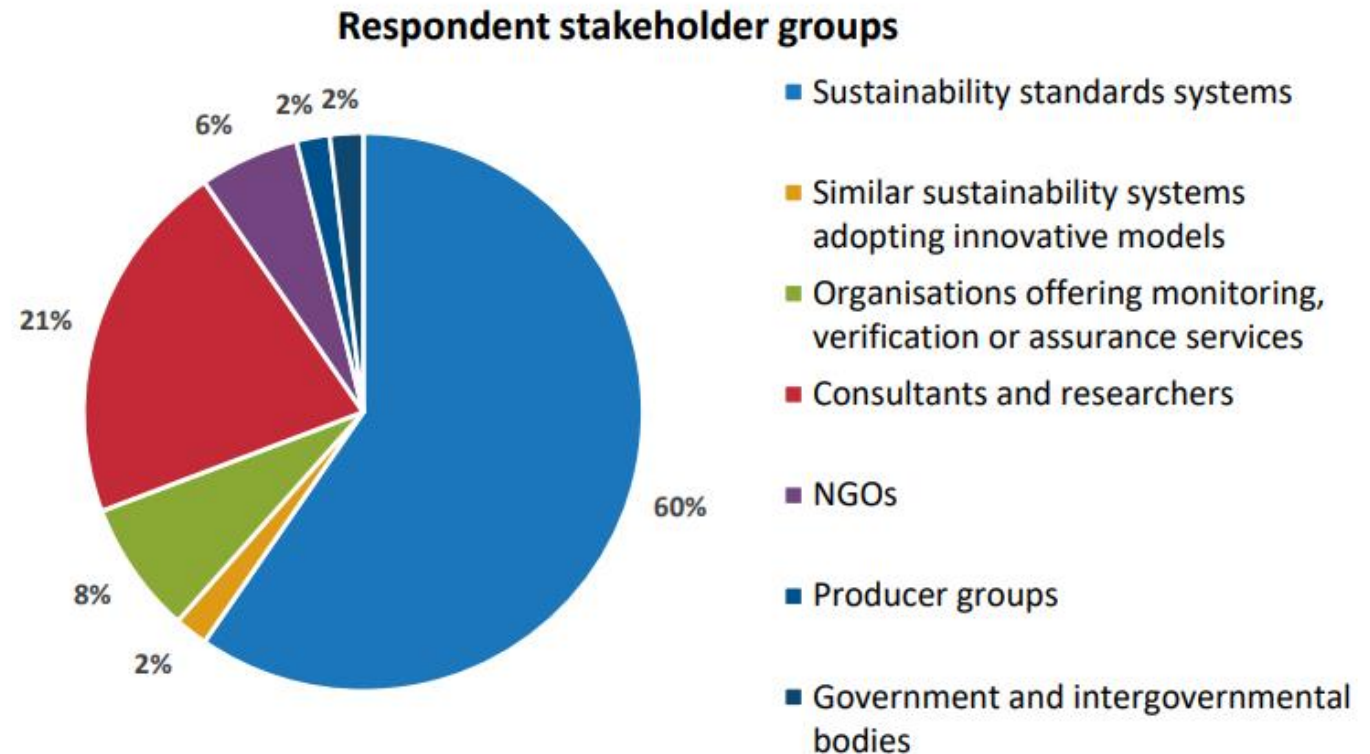
The consultation aimed to obtain feedback from a diverse range of stakeholders on the clarity, relevance, and feasibility of the code requirements, and the extent to which this aligned to stakeholder expectations.

Feedback was received through a range of consultation mechanisms, including a survey, workshops and webinars, excel spreadsheet, emails, and meetings.

Participation in the public consultation

We received 53 responses representing 45 organisations, across 17 countries.

The majority of respondents were standards systems (60%), and largely based in Europe (60%).



Addressing feedback gaps

When reviewing consultation feedback, we identified that some stakeholder groups and countries were underrepresented.

To address these gaps, we conducted additional stakeholder engagement, including commissioning a review of [NGO recommendations and critiques](#) to understand the NGO perspective, and conducted interviews with representatives of sustainability systems with innovative models.

An aim of the second consultation is to reach a more diverse demographic of stakeholder groups and countries. This has included arranging consultation activities in a wider range of locations, and seeking feedback directly from producers.

Summary of feedback and changes

- › Common feedback
- › Evaluation approach
- › Chapter 1: Strategy for impact
- › Chapter 2: Governance
- › Chapter 3: Scheme performance and continual improvement
- › Chapter 4: Data and information management
- › Chapter 5: Stakeholder engagement
- › Chapter 6: Standards development and maintenance
- › Chapter 7: Assurance
- › Chapter 8: Claims

Common feedback

- › Efforts to include a wider range of sustainability systems are important, but the Code is not relevant enough to systems such as rating approaches, improvement systems, and those operating at landscape or jurisdictional level. Phrasing reviewed and adapted to ensure relevance. Additional stakeholder feedback obtained through interviews, and a consultant hired to assess the redrafted Code for relevance. Feedback against clauses noted for consideration when developing guidance.
- › The feasibility and relevance of requirements is dependent on the size of the scheme. Amendments to MEL chapter to improve clarity of how the size of a scheme influences the scope of its MEL activities. Editorial amendments throughout to improve clarity of expectations. Feedback against clauses noted for consideration when developing guidance.
- › Changes are needed to avoid duplication and improve the efficiency of the how the Codes have been integrated. Sequential and editorial amendments made to reduce duplication and further streamline the Code.

Common feedback

- › More clarity is needed on how the Code addresses due diligence and what schemes are expected to implement. Significant amendments made to the content and sequencing of due diligence clauses. Supporting guidance will be developed to be published alongside the second consultation. External feedback from relevant experts obtained to provide input on amendments.
- › There are interpretation and evaluative challenges from the use of broad terms (e.g., “regularly”, “sufficiently”) or terms that are dependent on context of application (e.g., “stakeholder”, “whenever practicable”). Terminology reviewed and adapted to improve clarity, and an external consultant hired to assess accessibility of language. A draft glossary will be published alongside the second consultation, and evaluative feedback consolidated to inform development of the compliance approach and supporting guidance.
- › Some clauses duplicate or have conflicting content to regulatory requirements, legislation and ISO standards. External references mentioned in feedback cross-referenced against requirements to identify duplication or conflicts and adapt accordingly. Reference to relevant ISO standards added. Strategies to improve clarity of alignment noted for consideration when developing guidance.

Evaluation approach

- › More clarity is needed about the evaluation of the Code, including the transition period and format of assessments. Additional guidance will be published alongside the second consultation. External consultant hired to review the Code to ensure clarity of evidence and auditability. Development of the updated Code compliance programme is ongoing, with additional pilots and research planned.
- › Supporting guidance is needed to help clarify what is expected for compliance. All feedback about guidance have been noted and will inform the wider strategy about the corresponding guidance necessary to implementation and evaluation.

Chapter 1: Strategy for impact

- › A theory of change is not relevant in all contexts and is too prescriptive.
Theory of change moved to guidance. Critical components of theory of change included within relevant clauses.
- › Requiring partnerships and cooperation as a strategy to improve scheme efficiency is overly ambitious and difficult to evaluate.
Clause removed.
- › Socialising the theory of change with external partners is not practicable or feasible.
Clause removed.
- › Steps required in defining a schemes strategy and background analysis are too complex and unclear.
Significant sequential changes and adaptation to clauses to improve clarity and simplify requirements, including combination of relevant clauses to improve the structure and clarity of this chapter. Terminology simplified (e.g., reference to materiality removed, title changed to “strategies for creating impact”).

Chapter 2: Scheme governance, operations and integrity

- › Records and policies required to support scheme governance are overly complex and onerous.
Greater clarity on expectations achieved by dividing content into several clauses and providing guidance to support interpretation.
- › More clarity is needed on expectations for due diligence assessments, how this is relevant to the due diligence within the Code, and why this is included within clause for contracts with external partners.
New clause created to address due diligence, and significant amendments to the clause on contractual requirements to improve clarity and relevance.
- › More clarity is needed on expectations of a schemes management system and how this corresponds to all scheme components.
Significant sequential changes made, including creating a new chapter on policies and procedures to make the distinction between governance processes.

Chapter 3: Scheme performance and continual improvement (monitoring, evaluation, and learning)

- › More clarity is needed on expectations for various clauses in this chapter. This includes clauses on evaluative questions, frequency of evaluation, and the development of the guiding framework for MEL.
Significant sequential and editorial changes made to the entire chapter, including creating new clauses and changing terminology (e.g., learning questions and plan of activities).
- › There are some concerns about the feasibility of MEL requirements for small or newly established schemes.
New clause created to clarify how a scheme should adapt their MEL activities to reflect the scope of operation.
- › Requiring alignment of monitoring indicators is beyond the scope of the Code and may not deliver value.
Clause deleted.
- › Several phrases are found to be overly ambitious, including establishing causality and completing cost-benefit analysis.
Deleted as part of a review of the level of ambition of the Code and the approach to simplifying this chapter.

Chapter 4: Data and information management

- › Some clauses are duplicative and editorial improvements are needed to improve clarity.
Adaptations made to reduce duplicative text and to improve clarity.
- › There are some concerns about the relevance to smaller systems as requirements are too onerous and impractical to implement.
Level of ambition of clauses considered, and while the implications are recognised, it was identified as being necessary to support credible practice. Editorial adaptations to clarify expectations, and feedback against clauses noted for consideration when developing guidance.
- › Level of ambition could be raised to reflect developments and innovations in this area.
Suggestions recognised as important but too prescriptive to include in the Code.

Chapter 5: Stakeholder engagement

- › The definition of stakeholder needs clarification. The definition has implications for the feasibility and value of the requirements in this chapter and throughout the Code.
Adaptations made to clause requirements to clarify scope of stakeholder engagement. Feedback against clauses noted for consideration when developing guidance.
- › Requirements for the dispute resolution system need clarification. Improvements to terminology are needed to clarify expectations and how this addresses issues of grievance and allegations.
Significant adaptations made to provide greater clarity and ensure consistent and accurate terminology. The relevance of dispute resolution systems to remediation and due diligence processes will be clarified in supporting guidance.
- › Requirements around mechanisms for stakeholder input are overly ambitious and prescriptive.
Clause deleted and accessibility of stakeholders to provide input achieved elsewhere in the Code.
- › Remediation clause needs more clarity on relevance and expectations for implementation.
Clause deleted. A new clause created in chapter 1, and remediation content incorporated into other relevant clauses.

Chapter 6: Standards development and maintenance

- › Including all of a scheme's standards within scope of the Code is too onerous and would not deliver intended outcome.
Amendments made to clarify how processes can vary between different standards to reflect complexity and stakeholder interest.
- › Expectation for schemes to seek consistency between standards and reduce duplication is overly prescriptive and could negatively impact schemes.
Clause adjusted to reduce level of ambition and specificity.
- › Contrasting opinions on the approach to substantive changes; some agreed with not requiring stakeholder engagement, but others disagreed and felt that it was necessary.
Interpretation guidance added to provide clarity on when it is beneficial to have capacity to make substantive changes without stakeholder engagement.
- › Requiring field tests as part of feasibility assessments is overly prescriptive and onerous.
Clause simplified and reference to field tests removed.

Chapter 7: Assurance

- › Traceability clause needs more specificity. The intention is unclear, and difficult to evaluate.
Adaptations made to improve clarity, including moving the clause to chapter 8 and adding interpretative guidance
- › Phrase “remediation” of corrective action can lead to confusion due how the phrase remediation is used in different contexts. Additional clarity is needed on how this is relevant to due diligence, and the expectations of the scheme.
Clause adapted to enhance clarity, and other clauses adapted to clarify when and how remediation and due diligence corresponds to non-conformities. Noted to be included in corresponding guidance.
- › Several important processes from the Assurance Code v2 have been lost: calibration, and appeals.
Clauses reintroduced.
- › Requirements on providing performance insights are overly ambitious and are not feasible or relevant.
Clause adapted to reduce specificity. Interpretative guidance added to support clarity of expectations.

Chapter 8: Claims

- › Expectation on ‘monitoring’ needs more clarification. This will determine whether the requirements are feasible. Clause adaptations made to enhance clarity, and interpretative guidance added. Feedback against clauses noted for consideration when developing guidance.
- › Several clauses are duplicative. Adaptions made to various clauses to reduce duplication.
- › More clarity is needed about the role the Code plays in assessing the accuracy, relevance, and truthfulness of claims, and to what extent it can deliver this through review of the claims system. Amendments made throughout the chapter to emphasis these attributes. Feedback against clauses noted for consideration when developing guidance, and additional notes taken to ensure guidance addresses the extent to which the Code verifies the accuracy of a claim.

Next steps

Public consultation

- › The public consultation on the second draft of the Code runs from 31 May to 30 July 2023. We would welcome your views on the Code and whether the feedback on the first draft has been adequately addressed. More information on how to participate can be found on the [code consultation webpage](#).
- › If you would like to review the feedback received in further detail the full [log of comments](#) is available (in English only).
- › If you would like to discuss any of your earlier inputs and how these were taken into account, please contact consultation@isealalliance.org
- › Thank you to all the respondents who provided input and suggestions.