

Insights Report:

Assuring Agricultural Sustainability Claims Discussion Paper Consultation

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Executive summary

This report synthesises feedback received through the Department of Agriculture, Fisheries and Forestry's (DAFF) public consultation on assuring agricultural sustainability claims for international markets.

A broad range of stakeholders, with an interest in agricultural sustainability, highlighted the importance of improving the clarity, consistency and credibility of sustainability claims to meet evolving regulatory, market and community expectations.

The consultation indicates there is value in a trusted, cross-sector coordinating mechanism to clarify and compare sustainability credentials without duplicating existing frameworks or limiting sector-specific approaches. This would support greater transparency with respect to what credentials exist, how they are verified and by whom.

These insights will guide further work by stakeholders in Australia's traceability system that improves credentials, data interoperability and verification, to strengthen the credibility of claims and support the agricultural industry's sustainability reputation in global markets.

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NOTE ON CURRENCY OF INFORMATION

Regulatory settings, market expectations, industry and data initiatives have evolved significantly over the course of the project. The analysis in this report reflects the landscape as it was understood during the project through to report finalisation in November 2025.

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Acronyms

Term	Definition
AASF	Australian Agricultural Sustainability Framework
ABS	Australian Bureau of Statistics
ABSF	Australian Beef Sustainability Framework
ASSF	Australian Sheep Sustainability Framework
ASCWG	Assuring Sustainability Claims Working Group
AATGG	Australian Agricultural Traceability Governance Group
CSDDD	Corporate Sustainability Due Diligence Directive
CSRD	EU Corporate Sustainability Reporting Directive
DAFF	Department of Agriculture, Fisheries and Forestry
DSWG	Data Standards Working Group
ESG	Environmental, Social, Governance
EU	European Union
EUDR	EU Deforestation Regulation
EUGCD	EU Green Claims Directive
GLOBIOM	Global Biosphere Management Model
GRI	Global Reporting Initiative
ISSB	International Sustainability Standards Board
ISCC	International Sustainability & Carbon Certification
JAS	Japan Agricultural Standards
LCA	Life Cycle Assessment
NLIS	National Livestock Identification System
RFS	Renewable Fuel Standard
SMETA	Sedex Members Ethical Trade Audit
SWA	Sustainable Winegrowing Australia
US	United States

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1. Purpose

This report synthesises key insights from stakeholders who responded to the Australian Government’s consultation on assuring agricultural sustainability claims. The findings are organised in alignment with the initiative’s core scope:

1. Understanding essential sustainability credentials
2. Identifying approaches that use data to support claims
3. Supporting verification for market access purposes

In addition, this report provides an overview of stakeholder views on the role of government and provides a summary of common themes before suggesting some foundational concepts for the next stage of the project.

This document is designed to inform the next stage of the Assuring Sustainability Claims Working Groups deliberations and expands on the information provided in the *Sustainability Claims Discussion Paper* based on submissions through the public consultation process.

Scope

The insights from the consultation process are based on consideration of the scope of the project:

- Sectors
 - Wheat
 - Beef
 - Canola
 - Cotton
 - Wool
 - Seafood
 - Dairy
 - Horticulture (fruit and vegetables).
- Markets
 - EU
 - East Asia
 - South-East Asia
 - North America (principally the US).

Submissions

The *Sustainability Claims Discussion Paper* was provided to the Department of Agriculture, Fisheries and Forestry (DAFF) in October and released on their Have Your Say website for public comment on 4 December 2024.

Submissions closed on 3 March 2025 with final submissions provided to the project team on 19 March 2025.

By necessity, submission references are deidentified and aggregated as some responses elected to remain confidential. Submissions with publication permission are available online:

<https://haveyoursay.agriculture.gov.au/sustainability-claims>

2. Understanding the difference between claims and credentials

Throughout the course of this project there was much confusion regarding the terms sustainability claim and sustainability credential. In some cases, the terms held different meanings for different stakeholders, for others they meant the same things and were used interchangeably. Others used the terms inconsistently.

Based on the research undertaken, including stakeholder consultation, definitions are provided in this section.

Sustainability claim

A sustainability claim is a statement made by a producer, exporter or brand about the environmental, social or governance-related performance of a product, process or organisation.

It communicates to stakeholders, such as customers, investors, retailers or regulators, that certain practices or outcomes are being undertaken or achieved in:

- the production of the product
- the undertaking of the process; or
- by the organisation.

Examples of claims include:

- “This cotton was grown using 30% less water than the regional average.”
- “This beef is deforestation-free.”
- “Our farm has reduced emissions by 20% since 2020.”
- “This grain was grown without synthetic pesticides.”

Sustainability claims can be made at different levels:

- Farm level (e.g. animal welfare practices)
 - Product level (e.g. carbon intensity per kg)
 - Supply chain level (e.g. no forced labour in processing)
 - National/sector level (e.g. industry-wide Life Cycle Assessment (LCA) metrics)

Sustainability claims may appear as:

- **Consumer-facing materials**
Sustainability claims are used to influence consumer perception and purchasing decisions through product packaging, marketing and branding.

- **Business-to-business and supply chain materials**
Claims support commercial relationships and market access by meeting buyer requirements, aligning with procurement standards and demonstrating traceability and assurance.
- **Investor, banking, and finance-related**
Claims inform financial risk assessments, environmental, social and governance (ESG) compliance, and access to sustainability-linked funding, increasingly shaping capital flows into agriculture.
- **Government and regulatory-related**
Sustainability claims are provided as evidence in regulatory processes, trade compliance and public frameworks to meet domestic and international policy expectations.

Further examples of these are provided in Appendix 1.

A claim is an outward-facing message.

Sustainability credential

For a sustainability claim to have impact and credibility, the customer needs some level of assurance that the claim can be trusted. For this trust to be established, the claimant needs to provide evidence. This evidence can be in the form of:

- **data and information** (e.g. satellite imagery, sensor data, production records, outputs from tools or calculators etc.) that the customer can then analyse to verify the claim. Here, the cost of assuring the claim is borne by the customer; or
- a **trust anchor** through which trust is assumed. Trust anchors include accreditations, certifications and other forms of credentials provided by a third party. Trust comes through trust in the credential provider. Here the cost of assuring the claim is borne by the claimant.

A sustainability credential can therefore be considered a form of evidence, based on data and information or a trust anchor, used to support or substantiate a sustainability claim. It provides transparency about what evidence the claim is based on, how it was verified and by whom, and generally comes in the form of a certificate or qualification. Importantly, a credential can only be provided by a third party.

Unlike a claim, which is public-facing, **a sustainability credential may not be visible**, but it must be available on request or when verification is required (e.g. during audits or regulatory reviews).

A credential is one form of evidence behind the claim.

How they relate

Element	Claim <i>outward-facing message</i>	Credential <i>one form of evidence behind the claim</i>
What it is	A statement about sustainability	A statement from a third party, verifying the statement
Purpose	Communicates intent or achievement	Substantiates and validates the claim
Audience	Buyers, regulators, public, investors	Auditors, buyers, regulators, internal teams
Examples	“Deforestation-free”, “Net Zero farm”	Certification, accreditation
Form	Text, Mark (logo), report	Certificate, statement of conformity/compliance

3. Understanding essential sustainability credentials

Emerging international regulations

In addition to regulations provided in the consultation paper, submissions called out specific emerging international regulations (relevant to scope) such as:

- European Union (EU) Green Claims Directive
- EU Corporate Sustainability Reporting Directive (CSRD) and Corporate Sustainability Due Diligence Directive (CSDDD)
- Antimicrobial bans for EU market access
- United States (US) Renewable Fuel Standard (RFS)
- Sustainability and Green Trade Standards (China)
- Japan Agricultural Standards (JAS) Organic and Sustainability Certification for Grains

Some sector-led responses emphasised that regulatory misalignment or poor preparedness could create non-tariff barriers to trade.

From a regulatory perspective, the top sustainability topics included:

1. greenhouse gas emissions and carbon footprint;
2. animal welfare;
3. deforestation, biodiversity and land use;
4. chemical use;
5. labour conditions and modern slavery; and
6. water use and resource efficiency.

Broad support for sector-defined priorities

Stakeholders overwhelmingly supported building on existing sector-led frameworks (e.g. Australian Sheep and Beef Sustainability Frameworks (ASSF, ABSF), Sustainable Wine Australia (SWA), organic certification etc.) which reflect sector-specific material issues and are evolving in response to international expectations. Common priority topics across sectors include:

1. GHG emissions;
2. animal welfare;
3. biodiversity and deforestation; and
4. water use and efficiency.

Some sectors emphasised soil health, ecosystem management and chemical stewardship as equally critical sustainability indicators. Others identified labour and human rights as being important.

A recurring theme across submissions was the evolving concept of materiality, particularly in relation to the EU's Corporate Sustainability Reporting Directive (CSRD). Unlike traditional financial materiality, CSRD integrates double materiality, capturing both the risks to business and the impacts

of business. Some stakeholders noted that Australian frameworks may need to expand their view of materiality to align with these emerging expectations and avoid market misalignment.

Concerns about overreach and misalignment

Several submissions warned against adopting externally imposed, prescriptive metrics that may not reflect Australian production realities (e.g., arbitrary pesticide reduction targets or region-specific standards such as EU copper limits).

Concerns about one-size fits all but also need for national coordination

There is broad consensus that a “one-size-fits-all” approach does not work and that flexibility is needed to accommodate differences across sectors, scales and geographies.

Several submissions also referenced the Australian Agricultural Sustainability Framework (AASF) as a valuable national coordination mechanism. While views varied on how prescriptive a national framework should be, there was recognition that the AASF can help align cross-sector efforts, provide shared reference points and enhance Australia's credibility in global markets without replacing commodity-specific programs.

This feedback points to the value of such a whole-of-industry coordinating mechanism, one that supports clarity, coherence and connection to reduce duplication, streamline efforts and lower the cost of demonstrating sustainability at a whole of industry level while respecting sectoral autonomy.

Concerns about credibility and trustworthiness of some credentialling schemes

Some submissions indicated a growing sense of distrust in some credentialling schemes, particularly industry or retailer managed schemes, citing concerns around independence and rigour.

Stakeholders indicated that trust is more likely to be achieved when claims are supported by clear, specific and independently verified credentials.

4. Identifying approaches that use data to support claims

Data systems must be interoperable, practical and value-driven

Stakeholders emphasised that while data is foundational, interoperability, quality and usability of existing data are major gaps. Several submissions described data systems as “fragmented,” with the burden caused by this fragmentation falling disproportionately on producers.

There was little appetite for a single overarching data system. Stakeholders emphasised the importance of governance models that respect existing sectoral ownership of data, while enabling confidence in how data is used for verification and assurance purposes. Stakeholders favoured a federated approach that connects and supports sector-specific systems rather than replacing them, reflecting the diversity of commodity needs and existing investments in data infrastructure.

Stakeholders highlighted a need for harmonised, low-burden data capture approaches that leverage existing systems and regulatory datasets, including NLIS and industry assurance programs.

The AASF was referenced by some respondents as a potential vehicle to promote consistency across indicators and methods, helping to ensure that sector-led efforts can contribute to a coherent national story.

Avoid creating burden without value

Multiple respondents stressed that producers will not engage with sustainability credentialing programs unless they clearly deliver market, regulatory or reputational value.

Stakeholders cautioned against assuming market premiums will arise from sustainability credentialing programs. Instead, traceability and sustainability are often prerequisites, not differentiators.

Some submissions highlighted frustration with duplicative audits and calls for streamlining through accepted global standards.

Stakeholders from many sectors highlighted the disproportionate impact of duplicative data requests, conflicting standards and short implementation timelines for producers. These overlapping demands, often driven by multiple buyers, regulators or voluntary schemes, risk undermining participation, especially when the expected benefit to the producer is unclear or indirect. Several submissions called for clearer alignment across schemes and a “verify once, use many times” approach to reduce compliance duplication and strengthen trust in sustainability credentials.

Priority data needs and gaps

Suggested priority data areas included:

1. on-farm energy use;
2. water-use efficiency;
3. biodiversity;

4. landscape management;
5. chemical use (contextualised);
6. antimicrobial use (animal sectors); and
7. GHG accounting methodologies.

These insights reflect strong support for several principles underpinning a coordinated national data approach: interoperability of data, reduced duplication of effort and the importance of trustworthy, benchmarked data that can be used for multiple purposes, reused and repurposed (e.g. farm management software).

There was little appetite for a single overarching data system; however, stakeholders did show a clear appetite for investment in digital infrastructure that enables streamlined reporting, leverages existing datasets and allows sector-led efforts to contribute to a shared evidence base for sustainability claims.

There is a call to build capability around data integrity and benchmarking, particularly in smaller and emerging industries.

5. Areas of divergence and convergence

There is a clear pattern of both alignment and divergence between what sectors consider sustainability priorities to be and what regulators and markets expect.

Alignment

- GHG emissions - Strong alignment across all commodities and regulators.
- Animal welfare - Priority for animal-based sectors and major international markets.
- Biodiversity and deforestation - Shared concern, especially for land-intensive sectors.
- Water use and efficiency - Considered important by both production sectors and regulators.

Divergence

- **Soil health**
Sector view: Critical for productivity, carbon sequestration and resilience.
Regulatory view: Often overlooked or indirectly addressed via carbon farming or regenerative labels.
Gap: Markets rarely ask for direct soil data, despite sector emphasis.
- **Worker health and safety**
Sector view: Framed as “worker wellbeing” and workplace safety.
Regulatory view: Framed around labour conditions, modern slavery and ethical treatment.
Gap: Different framing leads to mismatched indicators; sectors focus on work health and safety compliance; regulators want human rights evidence.
- **Climate change adaptation and resilience**
Sector view: Emphasis on coping with climate extremes and improving system resilience.
Regulatory view: Emphasis on GHG emissions reduction, not adaptation.
Gap: Markets value emissions accounting over adaptive practices, which many sectors see as more urgent.
- **Biosecurity**
Sector view: Fundamental risk area, especially for livestock, horticulture and grains.
Regulatory view: Not commonly requested in sustainability claims, assumed as baseline in Australian exports.
Gap: Rarely featured in market sustainability documentation despite domestic priority.
- **Food safety and product quality**
Sector view: Especially critical in dairy, meat, horticulture.
Regulatory view: Often handled under separate technical compliance; not included in sustainability definitions.
Gap: Industry sees it as a reputational and trade risk, but not always accepted as part of a “sustainability claim”.

This divergence highlights the need for any national mechanism to bridge domestic sector realities and international regulatory framing, possibly by:

- Coordinated or shared materiality mapping.
- Translating sector priorities into language and indicators markets recognise.
- Demonstrating how sector initiatives address broader ESG expectations.
- Including sector-prioritised topics (e.g. soil, biosecurity) as supporting claims rather than headline credentials.

6. Supporting verification for market access purposes

Support for independent verification and certification pathways

A consistent theme was the need for credible, third-party assurance mechanisms, especially for exports to Europe, North America and Northern Asia.

While independent certification was widely supported as a means to build trust and market access, stakeholders also emphasised that without alignment or mutual recognition across schemes, multiple overlapping verification demands can increase compliance burden, particularly for producers operating across supply chains.

Certification is not always the path to credibility. Value-driven alternatives are needed

Stakeholders across sectors emphasised that certification alone does not guarantee commercial value. In many markets, financial rewards for producers are not guaranteed, and in many cases do not materialise, and compliance costs are significant.

Consequently, producers and supply chains are seeking more flexible, cost-effective approaches to meet verification demands:

- industry-scale data and reporting;
- mass balance systems for bulk commodities;
- credible self-declarations backed by verifiable processes and evidence; and
- light touch verification systems that do not encompass full certification.

Without strong governance, these alternatives risk being seen as greenwashing or dismissed by international markets. Flexibility must not come at the cost of integrity. Stakeholders emphasised the need for:

- a nationally coordinated framework or trust anchor to provide consistency, transparency and shared reference points;
- independent oversight, verification or benchmarking without defaulting to full certification; and
- alignment with international regulatory expectations, such as the EU Green Claims Directive.

In this context, value becomes not about price premiums but about enabling market access, reducing compliance risks, improving efficiency and reinforcing Australia's reputation for sustainable production.

Risks of trade barriers and market confusion

Some sectors warned of emerging non-tariff trade risks from misaligned or misunderstood sustainability claims and verification systems (e.g. US RFS, Global Biosphere Management Model (GLOBIOM), and EUDR etc.). There were also warnings that consumer-facing green claims (or trust marks) are losing impact with some markets prioritising internal ESG metrics over externally visible claims.

Understanding different levels of verification

Submissions highlighted that sustainability claims may require different levels of verification, ranging from self-declared and first-party verified to third-party certified or government-endorsed.

Stakeholders expressed concern that inconsistent expectations across markets, combined with a lack of transparency on verification levels, can lead to audit duplication and rising compliance costs. A shared vocabulary or reference model for verification levels could help clarify market expectations, support mutual recognition and build efficiency.

7. Considerations for government

Several submissions suggested that DAFF play a stronger role in oversight of data infrastructure and public verification systems, particularly to support clarity and confidence in the credentials that underpin sustainability claims where private systems face limitations in transparency or independence.

Multiple submissions urged government to:

- Invest in verification and data infrastructure.
- Support international recognition of Australia's regulatory settings (e.g., APVMA, food safety, welfare, environmental regulation).
- Coordinate across sectors to enable mutual recognition and reduce duplicative requirements.

Here too, the AASF was mentioned as a mechanism to help bring together these diverse requirements under a coherent national narrative, supporting consistency and reducing reputational risk.

Stakeholders emphasised that national coordination, such as through the AASF, should not override sector-specific frameworks, but rather serve as a platform to enhance coherence, enable mutual recognition and amplify sector-led approaches in international markets.

The Australian Bureau of Statistics (ABS) was mentioned, but less frequently and mostly in relation to its past role in providing independent, trustworthy agricultural data, and concerns over the discontinuation of certain datasets.

8. Common themes

General sentiment from stakeholders included:

- Leverage existing industry frameworks and avoid duplicative schemes.
- Ensure that data and verification systems can serve multiple end-users (markets, regulators, financiers) and build on existing national and industry initiatives. This will reduce the burden on individuals when it comes to providing evidence to support claims.
- Support a diverse range of assurance pathways. Any option needs to consider the range of assurance pathways from third-party certification to data-driven self-declarations underpinned by verifiable data.
- While commodity sectors are central, legitimacy requires broader involvement from society, welfare and environmental or similar groups.
- Ensure that any credentialing mechanism supports market access without adding unjustified compliance cost.
- Ensure alignment with international regulatory trends, especially in the EU and avoid unintended trade consequences through proactive planning.

9. Foundational concepts for next stage

Stakeholder consultation outcomes, previous research and related work undertaken by the authors point to the need for a nationally coordinated mechanism to support transparency, comparability and recognition of sustainability credentials. This mechanism could perform several critical functions:

- 1. A nationally coordinated mechanism to improve transparency and comparability of sustainability credentials**

This mechanism would include a national reference system or register to clarify what sustainability credentials exist, what they verify, who recognises them and what topics they cover (e.g. emissions, biodiversity, welfare). As a shared national resource, this would reduce duplication, improve trust and support comparability while respecting sector-specific approaches.

- 2. A structured approach to aligning credentials with market expectations**

This would provide a set of principles to guide industries and scheme owners in understanding which sustainability credentials are recognised in key export markets, what levels of verification or assurance are required and how to communicate them effectively. Such an approach supports consistent recognition and helps position sector-led efforts within a coherent national and international context.

- 3. A national reference tool to benchmark credentials against international standards**

This would support sectors and scheme owners to evaluate how well their existing sustainability credentials align with emerging global requirements (e.g. CSRD, Green Claims Directive). By identifying gaps and strengths, the tool would help stakeholders proactively adapt to regulatory changes and maintain credibility in international markets. Many industries are already undertaking this work independently, often duplicating effort, so a shared national tool could improve consistency, reduce resource demands and promote mutual recognition.

- 4. A supportive national system to strengthen sector-led claims**

This would provide shared tools, connections and visibility to help sector-specific claims be more easily recognised, trusted and used by markets, regulators or investors. Rather than imposing new rules or replacing existing programs, it would enable greater coherence and credibility across diverse efforts, supporting sectors to retain ownership while benefiting from national coordination.

Appendix 2 shows how the four functions would work together.

These four functions point to a cohesive national approach and opportunities to improve the coordination, visibility, alignment, credibility and recognition of sustainability credentials and claims, without overriding sector-specific leadership.

Appendix 1: Categories of sustainability claim use

Consumer-facing materials	Business-to-business and supply chain materials	Investor, banking and finance-related contexts	Government and regulatory-related
• Product labels or packaging. • Certification logos or trust marks. • Marketing materials (advertisements, websites, brochures, etc.). • Point-of-sale displays and shelf labels. • Social media or brand communications. • Product environmental footprint information. • Public ESG or sustainability reports (corporate or brand-specific).	• Reporting documentation to buyers or retailers. • Supply chain assurance or traceability systems (e.g. NLIS, mass balance systems). • Sustainability data submissions to buyer platforms (e.g. Sedex, SAI, retailer supplier portals). • Supplier self-assessments or attestations. • Procurement documentation (e.g. tenders, RFPs, supplier onboarding forms). • GHG or environmental impact calculators integrated into trade documentation. • Evidence submitted to meet retailer-specific codes of conduct or audit programs (e.g. SMETA, BRCGS). • Sustainability certifications required in contracts (e.g. for export tenders or supermarket supply). • Verified third-party audit reports (e.g. ISCC, RSPCA Approved, SWA).	• ESG risk assessments for investment or lending decisions. • Sustainability-linked loans (e.g. claims used to trigger interest rate discounts or loan terms). • Green bond or sustainable finance instruments. • Corporate sustainability or integrated reporting (aligned with standards like TCFD, ISSB, CSRD). • Data for Scope 3 emissions reporting by banks or corporate buyers. • Claims used to meet sustainability thresholds in investment portfolios or indexes. • Sustainability metrics or certifications required for project or agribusiness funding. • Disclosures in IPO, merger, or acquisition documentation. • Evidence provided to insurance companies for underwriting or premium decisions.	• Trade and export compliance declarations. • Data or evidence submitted to support biosecurity or food safety claims. • Evidence submitted for carbon crediting or biodiversity stewardship schemes.

Appendix 2: How the four functions work together

Element	Primary function	What it does	Who it helps	When it's used
Nationally coordinated mechanism (incl. register)	Foundation for visibility and comparability.	Clarifies what credentials exist, what they verify, who recognises them and what topics they cover.	All stakeholders: producers, sectors, government, markets.	Continuously, as the trusted source of credential information.
Structured approach to aligning with market expectations	Guidance for design and communication.	Provides principles to help sectors align credentials with buyer/regulatory expectations and communicate them clearly.	Scheme developers, industries, communicators.	During credential development or refinement.
National reference tool for benchmarking against global standards	Evaluation and readiness check.	Enables comparison of credentials against evolving global regulations (e.g. CSRD, GCD), highlights gaps.	Scheme owners, sectors, compliance leads.	Periodically for gap analysis and improvement.
Supportive national system to strengthen claims	Provides tools, connections and visibility to support sector-led claims without overriding them.	Integration and trust-building.	Sectors, exporters, investors, regulators.	Ongoing to support recognition and usability of claims.