

PROTOCOL

VISEC DEFORESTATION-FREE SOY (VISEC SLD)

ARGENTINA

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1. Introduction

The Platform for the Sectoral Vision of the Gran Chaco (VISEC) was born in 2019, as an initiative of the Chamber of the Oil Industry of the Argentine Republic, the Cereal Exporters Center (CIARA-CEC), The Nature Conservancy, Tropical Forest Alliance and the Peterson Group.

The main objective of VISEC is to achieve that the total amount of soybean traded through the VISEC Protocol is recognized as deforestation-free in order to comply with the sustainable development requirements that the world is adopting. In this way, VISEC seeks to reconcile the productive, environmental and social visions of the soybean production chain in Argentina.

In line with this definition, it is proposed to create this Protocol, which with its application can guarantee that, throughout the chain of custody described in this document, the use of soybeans is deforestation-free.

The name according to VISEC of the Protocol will be VISEC Deforestation Free Soy (hereinafter VISEC SLD) and this Protocol is the result of consensus with the entire soybean agro-industrial chain in Argentina, as well as with internationally recognized environmental NGOs.

2. Background

Argentina

In Argentina, the National Congress has established a regulatory framework for the protection of native forests through the approval of Law 26.331 on Minimum Standards for the Environmental Protection of Native Forests (OTBN Law), regulated by the Executive Branch in February 2009. Argentina being a federal country, and according to Art. 41 of the National Constitution (CN), it is up to the provinces to dictate the necessary regulations to complement the national ones. Under Art. 121 and 124 of the National Constitution, the

provinces retain all powers not delegated to the Nation and have the original dominion of the natural resources existing in their territory.

Therefore, each province established Forest Management based on conservation categories, including those not suitable for conversion and/or cultivation:

Category I (red): sectors of very high conservation value that must not be transformed and that merit their persistence as forest in perpetuity, even though they may be habitat for indigenous communities and be the object of scientific research (National Law 26.331, art 9). Deforestation of native forests in this category cannot be authorized (National OTBN Law, art 14).

Category II (yellow): sectors of high or medium conservation value that may be degraded but, if restored, may have high conservation value. These areas may not be deforested but may be subject to the following uses: sustainable use, tourism, harvesting and scientific research. The production of soybeans or any other grain is not allowed in this category.

Category III (green): sectors of low conservation value that can be partially or totally transformed, subject to the completion of an Environmental Impact Study for the authorization of a Land Use Change Plan (PCUS). Soybeans can be produced here with prior environmental approval, based on provincial regulations.

As established by the Law and its associated regulations, all proposals for intervention on native forests must be submitted by the landowners to the Local Application Authorities (ALA) in the form of Conservation Plans (CP), Sustainable Management Plans (PM), Formulation Projects (PF) or Land Use Change Plans (PCUS). These plans will require the evaluation and approval of the ALA prior to their execution and must be subscribed by the owners and by a qualified professional, registered in the provincial registry that the ALA keeps for that purpose, in the form and with the scopes that it establishes.

European Union (EU)

The European Parliament and the Council, as co-legislators in the EU's Ordinary Legislative Process, reached a political agreement on EU Regulation 2023/1115 concerning the placing on the Union market and the export from the Union of certain goods and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010. It states among its recitals that, *"Forests provide a wide range of environmental, economic and social benefits, including timber and non-timber forest products, and provide essential environmental services to humankind, hosting most of the terrestrial biodiversity of our planet. They maintain ecosystem functions, contribute to the protection of the climate system, provide clean air and play a key role in water and soil purification, as well as water retention and recharge. Large forests act as a source of moisture and help prevent desertification of continental regions. In addition, forests provide livelihoods and income to approximately one-third of the world's population, and forest destruction has serious consequences for the livelihoods of the most vulnerable populations, including indigenous peoples and local communities who are highly dependent on forest ecosystems."*

According to the EU, the Regulation ensures that a set of raw materials and products placed on the EU market no longer contributes to deforestation and forest degradation in the EU and other parts of the world. Within the soy raw material category, the relevant products included are as follows:

Relevant raw material	Relevant products
Soybeans	1201 Soybeans, whether broken or not 1208 10 Flour and meal of soybeans (soya beans) 1507 Soya-bean oil and its fractions, whether refined or not, not chemically modified 2304 Oilcake and other solid residues, whether ground or in the form of pellets, resulting from the extraction of soya-bean oil

According to the EU, the new rules aim not only to reduce greenhouse gas emissions and biodiversity loss, but also to help guide the EU's work with partner countries to halt deforestation, while paying special attention to the situation of local communities and aboriginal peoples, who depend heavily on forest ecosystems.

The institutions agreed to set the deadline for the new standards (Cut-Off Date) as **December 31, 2020**. **Operators and traders will have to demonstrate that the products are deforestation-free (i.e. produced on land that was not deforested or not subject to forest degradation after December 31, 2020) and legal (i.e. compliant with all relevant applicable laws in force in the country of production).** The co-legislators agreed to **strict due diligence obligations** for operators, who must trace the products they are selling back to the parcel of land where they were produced and must be able to demonstrate that such products have not been produced on deforested or degraded land and that they have been produced in accordance with the laws of the country of production.

The core of this regulation is traceability, to ensure that products are "deforestation-free". The objective of the directive is to promote sustainable and responsible business behavior along global value chains and to strengthen human rights and environmental considerations in the operations and corporate governance of companies. Businesses play a key role in building a sustainable economy and society.

Regarding the legal compliance framework required by the EUDR regulation, Argentina has developed a comprehensive legality matrix aligned with Articles 9 and 10 of Regulation 1115. This matrix includes seven topics:

1. Land use rights
2. Environmental protection and deforestation
3. Indigenous peoples' rights
4. Free, prior and informed consent
5. Third-party rights
6. Human and labor rights
7. Tax, anti-corruption, commercial, and customs regulations

The matrix identifies six types of supporting documentation: official records, private contracts, third-party verified data, judicial decisions, audit reports, and internal policies. Compliance criteria are proposed based on reliability and consistency. The matrix is updated annually by the Inter-American Institute for Cooperation on Agriculture (IICA).

This framework is the basis of VISEC's approach to ensuring legality across various dimensions.

The risk assessment process includes:

1. Review of national regulations and the obligations of involved actors.
2. Proposal of compliance criteria.
3. Collection of supporting documents (automated or manual).
4. Verification of documents through official and third-party sources.

The document checklist by legality topic consists of:

- **Land Use and Tax Compliance:** Waybills (CPE) and customs shipping permits (PE). Documents such as the CPE and PE confirm active registration and compliance. RENSPA and CPD/DTE validate legal production. AFIP/ARCA block transactions from non-compliant producers. Customs and the Central Bank enforce strict controls, including criminal proceedings for discrepancies.
- **Labor Rights:** Reports and certificates from RENATRE, codes of ethics, grievance mechanisms. RENATRE reports are used to validate labor compliance. The VISEC Secretariat performs monthly checks and issues a certificate.
- **Indigenous Rights:** NGO reports, indigenous certificates. VISEC includes an annually updated study on indigenous communities and agricultural conflicts. It uses data from local actors, legal experts, and public records. If a producer is identified as high-risk, they are notified and given 10 days to respond.
- **Environmental Compliance:** Sustainability reports, environmental certificates. Forest Law 26.631 and the Federal System of Protected Areas (SiFAP) are used to block production in red/yellow zones. Green zones require approved land use change plans. Protected areas are mapped and monitored.
- **Cross-cutting Criteria:** MRV legal terms and conditions, sworn declarations, EUDR clauses in contracts. All productive units must sign a declaration covering the EUDR scope at the time of registration. Grain contracts must include EUDR clauses. These measures ensure consistent legal compliance throughout the supply chain.
- **Media Monitoring Certificate:** Used to detect reputational risks. CIARA–CEC contracts a media monitoring service that tracks online and print news, blogs, and social media. Keywords include soy, labor rights, corruption, and indigenous issues. Monthly reports are sent to VISEC. If a producer is identified, they are notified and can be blocked if legal proceedings are confirmed. Users may exclude high-risk producers from their supply chain.

It is important to note that authorization suspensions apply only to future campaigns.

3. Objectives and Scope

By virtue of the above, the main objective of this Protocol is to ensure that the soybean used by the export industry is produced in a sustainable manner, without contributing to deforestation. This implies generating food in a responsible manner while preserving the biological diversity in and around the production areas in the country.

Through this Protocol, it will be possible to identify the origin and flow of soybeans produced in Argentina in order to prevent them from coming from deforested areas and to ensure that the described objective is met.

For the purposes of this Protocol, and following FAO definitions and considerations, forest is defined as land extending over at least 0.5 hectares or 5,000 m² with planted trees (predominantly composed of trees established by planting and/or deliberate seeding) or natural trees (includes virgin or naturally regenerating forests composed of native species) with a height of at least 5 meters and a crown cover of at least 10% or that can potentially reach these parameters (example: abandoned agricultural areas with regenerating trees that can reach these requirements). Within this definition, windbreaks, barriers and tree corridors at least 20 meters wide with an area equivalent to at least 0.5 hectares or 5,000 m² are also considered as forest. Land that is predominantly used for agricultural and/or urban purposes is not included in this definition and therefore not considered as forest.

Deforestation refers to the conversion of forests to agricultural use, whether caused by human activities or not. A decrease in canopy cover below the 10% threshold is considered deforestation. Although the definition clarifies that conversion is independent of human action, FAO specifies that in the event of a natural disaster (e.g. a forest fire), if the affected forest is allowed to regenerate and the disturbance is not used for conversion to agricultural use (or other than the original use prior to the disturbance), it would NOT be considered deforestation. In the event that the change caused by the natural disaster results in the detection of an agricultural use (or other use that differs from the original one) in that area, it will be considered as deforestation. Additionally, a change from a forest to an agricultural use, such as the introduction of an agroforestry system, even if it does not involve land clearing, will be considered deforestation. The term excludes, in the case of forest plantations, areas where trees have been removed as a result of harvesting or logging, and where the forest is expected to regenerate naturally or with the help of silvicultural measures. Also, under the considerations of the regulation, the removal of trees for infrastructure works such as roads, buildings and/or renewable energy works is excluded from this concept.

On the other hand, forest degradation is defined as structural changes in forest areas, including the conversion of naturally regenerating forests and primary forests to forest plantations or other wooded lands, as well as the conversion of primary forests to planted forests.

The definition of Deforestation Free Soy according to the Protocol considers the following points:

- All soybeans produced on land that was not deforested after December 31, 2020;
- All soybeans produced on land that comply with all relevant applicable laws in force in the country of production.

In terms of scope, VISEC covers the entire national territory under agricultural production, but focuses on the Gran Chaco region. The Gran Chaco, a region spread over 108 million hectares of Argentina (62%), Paraguay (25%), Bolivia (12%) and, to a lesser extent, Brazil (1%). It has a great diversity of environments and is one of the main forested regions of South America along with the Amazon and the Brazilian Cerrado. The Gran Chaco is a site of high value for biological diversity on a global scale, with a wide variety of ecosystems and native species.

In Argentina, the Gran Chaco, or Parque Chaqueño, has a total area of 65 million hectares and is the largest forested area in the country, containing 40 million hectares of native forests, where important urban centers are located, and where there are also peasant communities belonging to native and creole cultures.

At the same time, it is a very active hub in the origination of grains, meats, fibers and biofuels, with more than 12 million hectares under production. For this reason, the agricultural sector is one of the most important for the region and for the country.

4. About the organizations, institutions and companies that make up and lead VISEC

The Platform for the Sectoral Vision of the Gran Chaco (VISEC) is a sectoral initiative that brings together different actors in the soy value chain to promote the reduction of negative environmental impacts. VISEC focuses on deforestation and other forms of land use change, encouraging sustainability at the national level and improving the chain's competitiveness: "To promote an environmentally responsible and economically viable production chain".

4.1 Membership and Governance

VISEC is a transparent and open platform that makes every effort to disclose its processes to advance the continuous improvement of soybean chain sustainability through leadership, science, and multi-stakeholder participation and collaboration. VISEC membership establishes three categories of participation:

- Full Members: organizations directly involved in the soybean chain. This category includes (I) Producers and producer associations; (II) Stockpilers or Brokers; (III) Processors and Industry; and (IV) Exporters. The members belonging to this category are those who have a vote at board meetings and are part of the working committees.
- Collaborating Members: organizations indirectly linked to or with a particular interest in the sustainability of the soybean chain. These include retail and wholesale chains, civil society organizations, inputs and services, government entities, academia or research institutions, among others. Members belonging to this category do not have a vote at board meetings, but may be part of the working committees.
- Observer Members: These are individuals or specialized organizations that have specific experience in the various fields related to sustainable soybean production and/or wish to be kept informed about the progress of the initiative and the steps to be taken. They do not participate in the working committees and do not have the right to vote in the board of directors.

VISEC has an internal Operating Regulation that seeks to ensure the correct governance and structure for decision making. As established in the Operating Regulations, VISEC has Committees or Working Groups: Technical Committee, Communication Committee and Finance Committee. Both the VISEC SLD Protocol and the VISEC Monitoring, Reporting and Verification System (MRV) were developed in a participatory manner within the Technical Committee and approved by the Steering Committee. The annex is available to all VISEC members.

4.2 Operators adopting the VISEC SLD Protocol

The operators that can adopt this protocol are: **Exporting companies of soybeans or soybean by-products, Intermediate Gatherers, Brokers, Producers and other actors** handling grains, meals, oils and soybean derivatives, which are located in Argentine territory and are committed to fully comply with the requirements of this Protocol.

5. VISEC SLD Protocol

Technically, the development of the VISEC SLD Protocol was based on the monitoring, reporting and verification (MRV) recommendations of the Accountability Framework Initiative (AFi). **Through this methodology, VISEC makes it possible to identify and trace the origin of soybeans starting from the lowest possible level, the production unit, and to follow the flows of soybeans along the entire value chain produced in the Argentine Republic, demonstrating that it does not come from deforested areas based on the cut-off date established in VISEC with regard to the European Union market (December 31, 2020) and compliance with Law 26.331/07 of Territorial Management of Native Forests and its applications at provincial level regarding the non-deforestation and subsequent cultivation in areas of forests categorized as red (Cat I) and yellow (Cat II), as well as not coming from areas of forests categorized as green (Cat III) that do not have the proper approval of change of land use by the competent enforcement authority.**

This systems model consists of three general actions:

The first is **Monitoring**, in which methods are established to collect information from the productive units and specific evaluations are made related to changes in land use in accordance with VISEC's commitment. This stage also seeks complete traceability of soybeans throughout the entire chain of custody reaching Argentine export ports.

The second stage is the **Report**, which reflects the progress and results related to the implementation of the commitments, which are reported in a transparent manner through VISEC. The reports present quantitative and qualitative progress metrics, adhere to common definitions, indicate data sources and independently verify the information by detailing the monitoring methodology used. If a plan has been re-evaluated and new targets are defined, the implementation plan will be agreed again.

Finally, the **Verification** action will be carried out, where compliance with the commitments is validated through verification processes carried out in accordance with the indicators of sustainability, rigor and independence.

6. Requirements for Productive Units for agricultural use (Primary Level)

6.1 Data Collection Methodology and Analysis of Production Units

At the production unit level and as a first action to comply with this protocol, VISEC established that it shall determine and/or analyze whether the production units of agricultural use in Argentina were deforested after December 31, 2020 and consequently, are outside Categories I and II or in Category III without proper government authorization in accordance with the Forestry Law. For this, VISEC will use the information provided by the operators of the Protocol to collect, analyze and then determine the status of compliance with the purposes of this Protocol for each production unit provided.

Productive Unit is defined as the parcel of land (within a property) that will yield a given crop as a result of the production of a defined producer.

Monitoring, Reporting and Review System (MRV System) VISEC

Led by the Rosario Stock Exchange, and the participation of VISEC members through the Technical Committee, a digital solution on traceability and traceability adapted to a diversity of producers (including small producers) was developed to facilitate legal and deforestation-free trade flows to the EU in the soybean value chain.

Operators shall upload to the VISEC MRV System the boundaries of each production unit whose geo-referencing will allow precise identification through satellite images of changes in land use according to the requirements of this Protocol.

Reporting requirements for compliance with the VISEC Production Unit Requirements

- Identification of the production unit according to RENSPA ID coding and registration in the VISEC MRV System.
- Bill of Lading accompanying soybeans with the wording "EUDR Soybeans".
- Georeferencing data (polygon that delimits the production unit)
- Satellite images of production units prior to December 31, 2020, as defined by RENSPA.
- Affidavit signed by producer in VISEC's MRV System (Annex 8)
- Current images of productive units for agricultural use.
- Land use change plan (PCUS) approved by provincial authorities in forest areas categorized as "green" (Category III) according to the National Budget Law for the Protection of Native Forests (No. 26,331), when applicable.

Identification of the production unit according to RENSPA

The RENSPA is the National Sanitary Registry of Agricultural Producers that covers all agricultural, livestock and forestry activities and associates the producer with the production and the farm. According to SENASA

Resolution (No. 465/2001) "it is an identifier of the agricultural establishment, property or physical place where the farm is located, and a subcode to identify the different producers that coexist in it". **The RENSPA is mandatory to carry out any agricultural and forestry activity in Argentina and allows the identification of the producer and the land where he carries out his activities, the products he cultivates, and the area affected by each of them (production units).**

The person responsible for the RENSPA is the human or legal entity that carries out agricultural-livestock and/or forestry activity and is the sanitary responsible.

The RENSPA is a Register of Producers (Responsible for Sanitary Production), associated to a CUIT and to the information that the AFIP has on the person responsible for the production. **Owners of leased fields do not have RENSPA.**

A RENSPA number is assigned to each producer in each production unit. Therefore, each of the producers within the same establishment must register in the RENSPA.

The productive units to be declared in this registry are those where the producer carries out his activity as of the date of registration, regardless of the form of land use. They are delimited territorial areas that function as a unit, which may or may not coincide with the parcel subdivision of the provincial cadaster and land ownership.

RENSPA Number Coding Criteria

The assignment of a RENSPA number or unique code or key has the purpose of identifying a producer located in a particular production unit. The producer will be assigned a RENSPA for each production unit where agricultural, livestock or mixed activity is carried out. In other words, a producer will have as many RENSPAs as there are production units. The RENSPA will be granted to the producer responsible for the activity, without this implying the creation, transmission, modification or extinguishment of rights over the property where these activities are carried out. In cases where several producers work in the same establishment, the RENSPA grants a different number (registration) to each producer.

Coding for RENSPA

- i. ID territory, establishment, field or property.
- ii. ID natural or legal person (producer).
- iii. ID RENSPA corresponds to the entity "Productive Unit".

The ID territory, establishment, field or property corresponds to the five-digit coding that, together with the province, district and region codes, must not be repeated in its jurisdiction. This area has its unique identifier, which is a part of the RENSPA number: 00.000.0.00000, although several owners may coexist in the unit. The number is unique and unrepeatable. It corresponds to the register of establishments in the Unified Registry.

The ID individual or legal entity is the number that uniquely and unrepeatably identifies an individual or legal entity, is the agricultural producer responsible for the activity, is nominated as holder and its unique identifier is the CUIT-CUIL that corresponds to the register of persons of the Unified Registry. Even in cases where animals or crops owned by different owners or producers or holders coexist in the same establishment, each of them will be registered independently in the register of persons.

ID RENSPA, according to the "Productive Unit" corresponds to the holder of the production.

This is the territorial area covered by the productive unit delimited on the map, drawing a polygon of as many points as required to achieve the best approximation to the real shape of the productive unit, obtaining the latitude and longitude of the area. This data is a critical input for the development of the current work.

VISEC will use the RENSPA ID to refer to the production unit. The RENSPA ID also contains the georeferencing of each production unit. The georeferencing data can be a point (latitude and longitude), and the territorial area covered by the productive unit is also delimited on the map, drawing on it a polygon, of as many points as required to achieve the best approximation to the real shape of the productive unit. **Each producer must provide information related to the production unit to determine its correct geographic location.** These polygons will be used to perform the *compliance analysis* by independent companies contracted by VISEC.

VISEC Qualified Production Unit

To be classified according to the VISEC Protocol as "VISEC Enabled Production Unit":

- The Productive Unit must not have been deforested after the cut-off date of December 31, 2020.
- The Productive Unit must not overlap with a protected area included in the National System, Natural Reserve, Provincial System or internationally recognized areas (Biosphere Reserve, Ramsar Site and World Heritage Site), registered in the SiFAP (Federal System of Protected Areas).
- The Productive Unit must not belong to an area containing forests classified as Category I (Red) or Category II (Yellow) or Category III (Green) without provincial authorization according to the Argentinean Forest Law. It must present the number of the approved Land Use Change Permit (PCUS).

On the contrary, any land destined for agricultural use and located in a protected area, within categories I and II, or within a green category without its corresponding PCUS approved according to the Argentinean Forest Law and/or with deforestation (either legal or illegal) after 12/31/20 will be considered as "Non VISEC Qualified Productive Unit". Any soybeans originating from these non-approved production units will not be classified as eligible for deforestation-free certification.

Furthermore, and using this same methodology, the maintenance of the Approved Productive Unit status will be verified annually. The methodology for analyzing satellite images, including the primary sources of information and the tools used, is described in detail in Annex No. 1. You may also find the various exceptions and considerations in annexes 1.1, 1.2, and 1.3 of this protocol.

7. Chain of Custody

Soybeans will only be considered eligible if there is evidence that they originate from a VISEC Qualified Production Unit, according to the analysis described in *Annex n°1*.

For this purpose, together with the coordinates of the production unit, the VISEC MRV System will identify the total area of the production unit, in order to establish the maximum possible volume to be certified by that RENSPA ID in relation to the maximum yields established in the MRV system for the campaign in question, according to the methodology established in Annex 4.

All deforestation-free soybean biomass moving downstream in the Chain of Custody must be accompanied by a Product Movement Record (PMR), which accompanies the official transport document (Bill of Lading, Removal Guide, BL, Remittance or Internal Document).

The Product Movement Record shall detail the RENSPA(s) equivalent to the volume determined in said document, so that the corresponding chain of custody can be verified and ensured.

7.1 Relevant Members of the Chain of Custody

The collection points and/or conversion units that receive soybeans directly or indirectly from the "VISEC Qualified Productive Units" must be registered in the VISEC MRV System.

The collection points must have previously undergone a qualification audit (initial audit) and have the Certificate of Conformity of the facilities.

The collection point will ensure that the producer has informed its RENSPA number and that it is registered in the MRV System). Likewise, the producer will be requested (in case it is the first time he delivers biomass to be verified in VISEC's MRV System) to submit the specific geopositioning data of the production unit according to the RENSPA registry where the soybean was grown. This procedure will be avoided if the producer has already uploaded the positioning of the RENSPA number by previous declaration, in order to have all the specific information of the production unit.

At this collection point, at the first point of reception of the merchandise prior to unloading, it must be verified if the production unit is authorized by the VISEC MRV System and if it appears as a "VISEC authorized production unit", complying with the sustainability indicators determined in the MRV System (free of deforestation and in compliance with local law).

Gathering and crushing facilities that produce any soybean product and have a valid facility Certificate of Conformity (Annex 2), at the time of exporting/trading goods shall request a recognized Verification Body to issue a "**Certificate of Deforestation Free Product (CPL)**" for each lot of products exported/traded under VISEC. This certificate shall be issued for each lot exported/traded as Deforestation Free.

Operators may be present at various stages of the Chain of Custody (i.e. Collection Point, Conversion Unit or Intermediate Collection) and have facilities in different locations.

If an operator delegates tasks to external suppliers (such as transportation, etc.), the operator is responsible for ensuring that the external supplier complies with the Protocol. The supplier must be included in the operator's management system.

VISEC may provide as Facilitating Operators of loading of Production Units (UP), relevant members of the soybean chain, such as operators of grain brokerage services.

These members will be able to operate exclusively in the Productive Units entry in system.

7.2 Acceptance to VISEC: Initial Audit and Certificates of Conformity of the facilities

All actors in the supply chain participating in the program must first register in the program as operators (VISEC MRV System). Secondly, they must provide training certificates for at least one (1) person from the plant/branch (online training through the Distance Education Center of the Faculty of Agronomy of Buenos Aires) confirming the passing of the self-assessment exam. Thirdly, they must supply the chosen Verification Body with the corresponding procedures and documentation to demonstrate product traceability (the Verification Body will validate said documents). The details of the instruction for verification bodies and the audit procedure are specified in Annex No. 9 of this Protocol.

Facilities that have passed an initial audit have a "Certificate of Facility Compliance". Only operators that have passed the pre-audit will supply soybeans to downstream conversion units or export and issue a detailed evidence of compliance on the Product Movement Record accompanying the appropriate Bill of Lading, Consignment Note, Removal Guide or other document for a lot of product.

All operators will be subject to a conformity audit and must be approved before any claim will be accepted. Certificates of Conformity of facilities will be issued by a Verification Body - VISEC accredited. VISEC will maintain a list of all Gathering Points, Conversion Units and Intermediate Gatherings that have Certificates of Conformity of facilities.

In the case of Productive Unit (PU) cargo Facilitator Operators, they must complete an online cargo course in the VISEC MRV system and accept the terms and conditions to operate, be enabled and be granted the exclusive access key to the PU cargo module.

7.2.1 Minimum requirements for VISEC approved operators

All members shall have a written procedure, approved in advance by VISEC (delegated to the verifying companies), which shall be available at all times, that ensures compliance with the Protocol. This written procedure shall demonstrate how the member will ensure that the amount of outgoing deforestation-free product never exceeds the total product received at the member's facility and how to avoid double counting.

At a minimum, all Members of this Program shall have systems and operating procedures (work instructions) to ensure consistency, accuracy and transparency of information and flow of goods and an overview of the scope, Tasks, Responsibilities and Authorities (TRA) of employees, with a description of operations.

Members must designate those responsible for the implementation, maintenance and surveillance of the Chain of Custody. Employees must be trained to:

- Verify the integrity and validity of documentation of renewable biomass and raw materials (Product Movement Record - Bill of Lading, or other documentation to ensure compliance).
- Identify product transfer.
- Document the origin of each soybean load and verify origin and yield against a list of approved areas and yield references.

- Indicate the storage (physical disposition) of approved cargoes.
- Perform internal tasks related to this Protocol to issue Product Transfer Documents for outbound shipments and that these are consistent with inbound volumes.
- Ensure the identification of deforestation-free soybeans during the storage and transportation process.
- Comply with record keeping requirements related to the Protocol.
- Collect and deliver the requested documentation for auditing purposes.

7.2.2 Certificate of Conformity of Installations (See Annex 2)

Certificates of Conformity (Annex 2) for facilities will be issued only after a pre-audit (remote or on-site), provided that all non-conformities, if any, are corrected to the satisfaction of the non-compliance.

The Certificates of Conformity of the facilities shall include, as a minimum, the following information:

- Identification of this Program.
- Identification of the Certifying Body/inspector that performed the initial audit.
- A unique certificate number.
- Date of issue and period of validity.
- Name of Member and nature of business activity (Storage facility - Transshipment facility).

After receiving a Certificate of Conformity from the facility, it will be allowed to operate with the program.

The Certificates of Conformity of the installations will be valid for a period of 3 years. Their issuance depends on the execution of an on-site and/or remote audit. Re-issues (after 3 years) must be made no more than 60 days before the expiration of your certificate.

In turn, the Facility Compliance certificate will require annual follow-up audits (12 months, with a 60-day window) from the date of issuance and will be conducted remotely or in person. No more than two remote follow-up audits may be conducted in a row. If the year 1 follow-up audit and year 2 follow-up are remote, then the year 3 follow-up audit must be face-to-face. Certificates will be valid as long as they are published in the VISEC MRV System.

7.2.2.1 Equivalent Qualification Audit

For the purpose of chain qualification, VISEC will admit equivalences with similar sustainability certification systems. This will allow its automatic qualification if the analogous standard is in force.

Any operator who intends to qualify a site (Stockpile/Port/Mill) under the VISEC protocol requirements, will have the possibility to avoid a new qualifying audit if he presents evidence that such site has another similar Audit for such purposes.

In order for such a site to effectively receive an accreditation, the verification body must always abide by the accreditation requirements set out in the VISEC protocol. Verification Bodies should indicate to the site the additional requirements to be added, over and above compliance with similar schemes.

Some considerations to take into account:

Scope and equivalency requirements

The equivalence will have the following scope and requirements for its confirmation by verification entities:

- Plants must have a management procedure that includes physical segregation management sections.
- Only for the purpose of enabling the plant (stockpiling, milling, port).
- Have the audit of other schemes **approved** at some point during the current year.

Auditors

- As for the training of auditors, it must be done through official VISEC courses, not admitting the equivalence with ISCC - EPA (RFS II) and 2BSvs training.

Exclusions:

- If a plant is VISEC enabled, it does not imply simultaneous enablement for ISCC/2BSvs/EPA schemes.
- If the certificate is withdrawn for reasons external to VISEC, the certificate for VISEC will also be withdrawn.

Summary of requirements for each scheme:

- The site authorization remains valid for 365 calendar days, calculated from the confirmation of equivalence.
- The equivalence applies to those sites that have had an on-site audit in the current year and cannot validate equivalent schemes issued in the previous calendar year.
- The qualification audit does not require a face-to-face mode to validate its equivalence.
- Follow-up audits will be conducted on a regular basis - according to the maturities of their schemes.

At the moment, the schemes subject to consideration by the verifying agency for such purposes are:

- ISCC
- RFS II
- 2BSvs

7.2.3 Deforestation Free Product (DFC) Certificate (See Annex 5)

VISEC does not issue certificates itself. Independent Verification Bodies carry out the audits that allow obtaining Deforestation Free Product Certificates (DFC).

At the same time, Verification Bodies issuing certificates for these products must be previously authorized by VISEC. For such accreditation, the Verification Bodies must demonstrate compliance with the guidelines of ISO

Guide 17065 in its most updated version. The current list of Verification Bodies authorized by VISEC will be available on the VISEC scheme website, together with the certificate models for authorized production.

CLDs will be used by economic operators as proof of compliance with VISEC requirements.

The CLD will be issued by authorized Verification Bodies (VB) whose list will be published by VISEC as established in point 10.2 of this protocol at the request of the owner of the product to be marketed. Processing plants shall have a valid Certificate of Conformity of Facilities at the time of requesting the CLD.

This certificate will be delivered to the applicant company by the OV and will be duly registered in the system.

CLDs will be void if they are falsified or contain incorrect information, or if at the time of issuance, the Verification Body is not recognized by VISEC.

7.3 Product Movement Record (PMR): Document assuring compliance / Bill of Lading (See Annex 3)

In Argentina, the Carta de Porte (Federal Guide) is a document that proves the legitimacy of grain movements. In accordance with the provisions of National Decree 34/2009, as of January 26, 2009, all shipments of agricultural products must be accompanied by this document. The Bill of Lading is a document used to control shipments of goods and is a valuable source of information as it provides transparency on the origin and commercial chain of grains during transportation.

To ensure compliance with tax obligations and commercial transparency in the transportation of grains, the required procedure must be followed.

Chain of custody members shall maintain RMPs throughout the supply chain for all deforestation-free soybeans handled by members. Any movement of goods from one operator to another must be accompanied by RMPs. In addition, information on how and where products were stored, transported and/or processed can be retrieved at any time from a database and/or data management system. These movements will be recorded in the Monitoring, Reporting and Verification system designed by VISEC.

Traceability and chain of custody will be guaranteed by a document that ensures compliance from the First Collection Point to the last processing point issued by the VISEC MRV System and the Deforestation Free Product Certificate (CPL) issued by the Verification Bodies (at export level) authorized by VISEC.

Traceability will be verified through the operators' Product Movement Records (PMR) and will be supported by official documents (e.g. Bill of Lading and/or delivery notes).

7.4 Document collection: traceability at first point of collection/receipt

The information will be stored in the VISEC compliance database to avoid double counting. The MRV system lists certificates by number and company, blocks identical numbers, and generates reports on renewable biomass processed from any member facility. In addition, the VISEC MRV System will have a crop yield check (annual average per zone), which, if exceeded, will trigger an alarm that will trigger an MRV data audit-verification system to validate or not the operation in relation to the cultivable area established for each ID. (See Annex 4).

This information will be available to the "Auditing" companies for desk audits and also when auditing facilities so that they can confirm that there is no double counting of products.

8. Data management

Records shall be kept at all stages of the Chain of Custody. Operators shall have a documentation and record keeping system that conforms to the requirements of this Protocol.

VISEC (or its designated administrator) shall maintain a "Database" to verify that soybean shipments comply with the requirements of this Program. VISEC shall have overall responsibility for administering the database. It may delegate all or part of this responsibility (for database administration) to authorized personnel, or administrative delegates or independent IT companies.

In order to maintain the confidentiality of the commercial operations that may be originated in the process, only the certifying company in charge of verifying the chain of custody will have access to the entire record of product movement and supporting documentation throughout the process. Participating companies will only be able to view the data originating from their participation in the process. The scheme may even have several levels of access to data visualization within each company if requested.

Member operators will enter the required data and documentation into the MRV system, using a unique password for each company. Such VISEC MRV system will record the data and documentation by number and company to identify and thus ensure the chain of custody at each step of the process. The database management will be checked during the annual VISEC audit.

All members of the supply chain that handle renewable biomass and feedstock and want to demonstrate compliance with the VISEC Protocol shall maintain the following records and make them available for review within 10 business days upon request.

- Documents evidencing the data included in the Product Movement Record (Bill of Lading or Proof of Compliance), with all required information listed in this proposal, for each shipment of renewable biomass feedstock received and shipped at the member facility. Also, documentary identification of storage points (silos, cells) where deforestation-free soybeans are safeguarded.
- Verification that an accurate accounting of deforestation-free versus non-deforestation-free (or no evidence) soybeans was maintained in the inventory at any given time.

8.1 Data management system to ensure compliance baselines

All spatial information (coordinates and imagery) will be stored and managed in a raw database developed for this purpose, which can be audited and queried as needed. Data in the Enabled or Non-Enabled Production Unit database will include all satellite imagery specific to the Production Unit (evidence in PDF format), or the approved Category III (Green) Land Use Change Plan (LUCP), if applicable. This Deforestation Free (LD) feedstock database will be part of the overall biomass compliance database to be managed by VISEC or as determined by VISEC.

A RENSPA ID database of VISEC Enabled Productive Units will be created for real-time use at soybean biomass processing and storage sites. The database will be used at biomass processing and storage, storage sites to

classify soybeans as deforestation-free biomass or not, according to their origin in the Product Transfer Documents.

Grain elevators or processing plants listed by VISEC will enter data into the VISEC MRV System, using a password operated by VISEC. The system will generate the Product Movement Record only if the production unit is considered as Enabled. Also, the SLD storage cell identification data will be entered in the system or in the operator's record. The MRV system will list the RMP by number and operator.

VISEC will maintain a Compliance Database that will track Product Transfer Documents entering a point of conversion. The compliance database will quantify soybean shipments from qualified Produce Units entering each storage, processing or transformation facility. The compliance database will provide a real-time summary of this data for independent inspectors to review as needed.

Likewise, for SLD derivatives (meals, oils, etc.), the MRV system will not provide a pre-determined conversion factor but will be calculated from the volumes reported. The conversion factor is not a set or reported data, but data calculated as the ratio between the volume of soybeans entered and the volume of each product processed. For calculation purposes, the factor will be taken with the maximum number of decimals possible and for display purposes it will be displayed with 2 decimals.

Minimum and maximum values of the possible conversion factors are defined in the MRV System, and it will be controlled that the reported values correspond to the values within the established parameters. These parameters are set taking into consideration the concept of relevant national legislation, in which there is an explicit reference for imported soybean crushing for the purpose of payment of Export Duties where Customs sets these percentages. According to the CTIT range, the maximum-minimum range for soybean meal would be 74.74%-71.17% while that of the CTITs has a slightly lower minimum level.

The MRV system will request that the storage locations of these by-products be identified in the Product Movement Record system as described for grain. This value will be taken as a standard for the control and calculation of SLD volumes and their by-products.

To comply with the declaration requirement requested by the European Commission's Interpretative Guidelines: "If silos are not emptied regularly, the operator must declare the place of production of all goods that entered the silo during a period that ensures that goods of unknown origin are not mixed in the process. For example, when unloading part of the goods stored in the silo, this could safely be done by declaring the geolocation of all goods that previously entered the silo up to a minimum of 200% of its capacity, provided the silo operates on a first-in, first-out or equivalent system that ensures the chronological depletion of raw material in the order of entry. This approach applies to relevant goods or products stored in piles, tanks, etc., as well as to all continuous processing. Other approaches can be applied for the 'first-in, first-out' system, as well as for other storage systems, provided it is guaranteed that goods from an unknown place of production or that do not comply with the EUDR are not mixed in the process."

The MRV system will make available to the auditor at the time of issuing the CLD (Certificate of Legal Deforestation-free), the surplus information (polygons) of all the merchandise that was present in the storage site at the same time. (This would require declaring an increasing number of plots in each due diligence declaration, since each time the same warehouse is filled with new soy and then some soy is removed for the EU market, the geolocation of the new soy and of all soy that previously entered the same warehouse since it was last emptied must be added.)

9. Compliance (third party verification)

VISEC will arrange for the Verification Bodies to carry out a comprehensive program of annual compliance verifications (Certificate of Conformity). VISEC will also manage the record keeping and general data management for the program and will be responsible for the overall integrity of the implementation and may utilize third party verification.

9.1 Verification objectives

The overall purpose of the Compliance Verification Program is:

- Obtain the documents and Product Movement Record associated with the transfer of soybeans and derived products between the different points of the storage, industrialization and transportation process;
- Confirm that the raw materials used to produce SLD Certificates meet the definition of deforestation-free soybeans.

9.2 Sites to be Verified

Annual Compliance Verifications will be performed at all registered industrial and logistic plants. The Verification Program requires the registration of all industries and their raw material suppliers (crushing plants and grain elevators) to comply with the VISEC program. Each site along the Supply Chain (intermediate warehouses and storage) will be subject to possible visits during the 3 years of certification to verify compliance with the Verification Program. This enabling audit ensures that members are aware of their requirements and have the systems and personnel in place to collect and report the required data. Upon passing the enabling audit, the facility receives a Certificate of Compliance and access to the Compliance Database where their Product Transfer Documents are stored.

9.3 Audit types according to installation

Different types of audits (e.g., monitoring or enabling or follow-up) are performed on each facility to be audited.

Industrial processing and stockpiling plants

- **Qualifying audit**, carried out in the first year of operation, on all the intermediate storage facilities. Its result implies enabled (compliant) or not enabled (non-compliant) to operate according to VISEC Protocol guidelines. Upon passing the enabling audit (according to specific requirements 7.2.1), the facility receives a Certificate of Conformity and access to the Compliance Database where its Product Transfer Documents are stored.
- **Follow-up audit**, carried out in the following years after the qualification audit, on all the intermediate storage facilities. Its result implies continuity of its previous status as enabled (compliant) or otherwise it becomes not enabled (non-compliant) to operate according to VISEC Protocol guidelines. It can be performed in person or remotely.

Ports

- **Enabling audit**, performed in the first year of operation, on all Ports. Its result implies enabled (compliant) or not enabled (non-compliant) to operate according to VISEC Protocol guidelines. Upon passing the enabling audit (according to specific requirements 7.2.1), the facility receives a Certificate of Conformity and access to the Compliance Database where its Product Transfer Documents are stored.

- **Surveillance Audit**, Conducted every subsequent year after the enabling audit, on all shipping ports. It can be remote or on-site. Its result implies the continuation of its previous status as enabled (conformant), or otherwise it becomes not enabled (non-conformant) to operate in accordance with the VISEC Protocol guidelines.

The Verification Body may implement unannounced audits of operators, as determined by VISEC or based on risk criteria or suspected non-compliance.

- Shipments

- **Single instance audit**, performed on shipments.

9.4 Verification reports

At the end of the process, the VISEC MRV System will provide different results, depending on the role within it:

- **Auditor, Importer, and Competent Authority Report**
- **Exporter Report**
- **Geoinformation in GeoJSON format**
- **Deforestation-Free Product Certificate (CLD)**

Auditor, Importer, and Competent Authority Report: The MRV system will issue a report for each shipment that allows verification of the internal processes to ensure the traceability and segregation of relevant products at each point in the commercial flow.

To comply with the declaration requirement requested by the EC's Interpretative Guidelines (sharing information up to 200% of the polygons of goods in contact in the same warehouse), VISEC establishes the conditions that must be met:

a. VISEC will add to the final report for the auditor the surplus information (geolocation coordinates and system identifier of the productive unit) of **all the merchandise that was present in each storage site at the same time**. That is, all the merchandise that co-existed at each intermediate point with the merchandise that was used to form the shipment that will effectively be sent to the European Union market.

- b. This information must be received **only by the auditor, not by the exporting company**, and the auditor commits to not revealing said information to the exporter or any other company involved in the system's chain of custody.
- c. Only upon request, and after signing a confidentiality agreement, the European operator (importer) may receive this same information, having declared that it will be for the **exclusive use of EUDR compliance**. The request must be made via email to the VISEC Help Desk (visec-mrv@bcr.com.ar), after which they will receive the corresponding NDA (non-disclosure agreement) which they must sign and return to receive the requested information.
- d. Upon request to the VISEC Help Desk (visec-mrv@bcr.com.ar) and signing of the NDA, the competent authority of the European country may also receive all this information.

Exporter Report: The MRV system will issue a report for each shipment that allows the exporter to verify the internal processes to ensure the traceability and segregation of relevant products at each point in the commercial flow. In indirect supply, the system encrypts the information, and the report will replace the producer's name and RENSPA with the **VISEC ID**.

Geoinformation in GeoJSON format: Must be uploaded to the **EU Information System**, compiling all productive units (ID, country, and polygon coordinates).

Certificate of Compliance: The third-party audit will issue, for each shipment, a **Certificate of Compliance** in accordance with EUDR regulation 2023/1115, as evidence that the biomass and the chain of custody supported by the documents meet the requirements established in this protocol.

In the event that a control authority (competent authority) identifies and notifies the exporter of the existence of a deviation, non-compliance, or lack of relevant information linked to the EUDR criteria, the operator must inform the corresponding Verification Body (VB). The VB must record the event in the non-conformity management system and, if applicable, activate the established corrective action procedure. Furthermore, each Certificate of Compliance will provide the VISEC communication channel so that the competent authority and/or importer can make contact directly.

10. Requirements for Verification Bodies (VO)

Verification Bodies (VBs) will conduct the audits of members wishing to participate in VISEC. The following points detail the accreditation requirements and recognition procedure for any Verification Body and its auditors wishing to verify compliance with the requirements of this Protocol:

- Full name of the Verification Body
- Name and contact details of the main contact person/Program Manager
- Addresses of the certification agencies' offices to be used to provide certification services and contact details
- Complaints procedure for handling complaints regarding certified organizations, open to any interested third party.
- Procedures for identifying and managing potential conflicts of interest
- A Quality Management System developed by the Verification Body, including at least:

- a. A record of competence, training and a clear justification for qualifying as an auditor to provide the certification service.
 - b. Performance of audits according to ISO 19011 requirements.
 - c. Certification scheme requirements
-
- Appointment of competent and trained employees in terms of the requirements of this Scheme.
 - List of recognized and approved auditors (name and e-mail contact details).

Verification Bodies shall also comply with at least the following requirements:

- Certificate of Accreditation of the most updated version of ISO/IEC 17065 guide requirements
- Make a formal application to the VISEC Secretariat for preliminary recognition as an applicant OV. They must be independent of the audited activity and free of conflict of interest.
- They must have sufficient skills to perform general audits.
- They must have sufficient skills and knowledge to perform specific audits related to the criteria of this Scheme.
- They must demonstrate that audits will be properly planned, conducted and reported.

These requirements ensure that the Verification Body is competent and qualified to produce credible results.

The competencies and skills of the designated auditors are key factors for the success of the VISEC Protocol. Training will familiarize them with the requirements of this Protocol. Auditors shall successfully complete a VISEC training course covering the criteria, indicators and guidance of this Protocol.

Auditors of Verification Bodies must meet the following minimum requirements in order to be an auditor in the VISEC MRV system.

- Be part of a verification company/agency, which has a proven track record in the certification system of at least 2 years.
- Successful completion of a VISEC training course for auditors.

Knowledge of the "VISEC Enabled Production Unit" definition, traceability and segregation system are the main requirements for auditors. VISEC will provide a training course for auditors covering the understanding of the VISEC Protocol, the "VISEC Enabled Production Unit" mapping methodology, traceability, the segregation system and basic auditing techniques.

At a minimum, auditors' responsibilities should include:

- The identification of activities and systems relevant to the criteria of this Protocol.
- Verification of the effective implementation of control systems.
- Development of a verification plan
- Request members to provide missing items.
- Report a final verification conclusion to VISEC (via the VISEC MRV System) and to the customer.

Auditors must be re-qualified every 3 years. This qualification is done through a monitoring program/process developed by each Verification Body. The monitoring program may include harmonization meetings, administrative reviews, external trainings, parallel audits conducted jointly by an external auditor, etc. Proof of the program must be submitted to VISEC.

Monitoring results should be documented and records kept for at least 5 years.

10.1 Procedure for Recognition of Verification Bodies in VISEC

The final recognition of all Verification Bodies will be decided by VISEC based solely on the general procedure described below:

- Review of all information and documentation submitted in accordance with the aforementioned list;
- Meetings with senior executives of the Verification Body and other management levels as deemed necessary;
- The right to act as an observer in at least one audit of the different Members of the supply chain. The selected Member(s) shall be informed in advance by the Verification Body and all potential conflicts of interest shall be avoided;
- The right to add additional requirements to those included in the minimum list at any time, provided that reasonable notice for compliance is given to the Verification Bodies and to investigate any complaints or suspected deviations from this Scheme;
- Take disciplinary action or withdraw approval.

VISEC shall sign an agreement with each Verification Body after the Verification Body is recognized.

10.2 Register of recognized and approved Verification Bodies

VISEC will maintain an up-to-date list of recognized Verification Bodies, which will be publicly available on the official website. Additionally, each recognized VB will receive a certificate of recognition from VISEC to present to relevant parties as needed.

10.3 Penalties

VISEC will withdraw the recognition of a Verification Body in case of non-compliance with the terms agreed with VISEC or if the Verification Body does not comply with the policy and requirements of this Protocol.

10.4 Confidentiality and conflict of interest of employees of verification bodies

Note: direct and subcontracted employees shall be considered employees of the Verification Body.

Employees of the Verification Bodies shall sign a "Code of Conduct / Confidentiality and Conflict of Interest Agreement". The Verification Bodies shall sign a similar agreement with each audited VISEC Protocol Member.

At a minimum, the following topics will be addressed:

- Confidential information: employees shall ensure that all confidential information received/obtained during the audit is kept confidential unless it is necessary to achieve and/or maintain certification status.
- Independence: Employees shall not engage in activities/tasks that may affect their independence. Employees shall inform the Verification Body of any potential conflict of interest with the applicant.
- Professionalism: employees shall act in a professional, accurate, independent and impartial

manner.

- Gifts: Employees shall not accept any incentive fee, gift or other benefit from the requesting organization or its employees.

11. Penalties for non-compliance VISEC operators

11.1 Types of operator non-compliance

A non-conformity is considered to be any non-compliance or violation of a VISEC Protocol requirement by an operator subject to qualification. They can be minor, major or critical.

Depending on the type of audit, the type and impact of its nonconformities will vary, and therefore, also the sanctions to be imposed on the operators, such as:

Applicable to all establishments (Stockyards, Milling and Port).

Minor Nonconformities:

- (1) No severe impacts,
- (2) Involve a lack of documentation or information requirements without severe impacts.
- (3) Do not lead to suspension or disqualification.

Major nonconformities:

- (1) have a severe impact or have a severe impact, but are not minor, and (2) have a severe impact or have a severe impact, but are not minor and
- (2) are not critical.
- (3) Suspend or suspend a rating.

If minor nonconformities are repeated or become systematic, they may be considered major.

In the case of major nonconformities, customers shall have **30 calendar days** to resolve them. Within this time frame all non-conformities must be corrected by implementing appropriate corrective actions as determined by the Verification Body.

- In case of a qualifying audit, the issuance of the certificate of conformity of installations is postponed until the resolution of the major non-conformity is verified.
- In case of a follow-up audit, during the 30-calendar day period, the issuing Verification Body must suspend the validity of the certificate (suspension) with immediate effect from the date on which the major non-conformity was identified and until the non-conformity is resolved.

If a major nonconformity is not resolved after 30 calendar days have elapsed:

- in the event of an enabling audit, this would prevent its qualification,
- in the case of a follow-up audit, leads to a declaration of invalidity of the certificate. The client must **apply for a re-qualification audit** if he wishes to operate under VISEC protocol again.

It is the responsibility of the System operator to comply with the VISEC Requirements. The Verification Body shall end the suspension within or after this period if it confirms the successful implementation of the corrective actions.

For exceptional causes the suspension may be extended to 30 calendar days only after VISEC's consent to implement the remaining corrective actions. If all major non-conformities are not corrected and/or compliance with VISEC requirements cannot be proven within the suspension period, the Verification Body must declare the certificate invalid and withdraw it with immediate effect.

The Verification Body must inform the VISEC institution immediately about any suspension, its planned extension, its termination or withdrawal of a certificate.

Critical nonconformities

In the case of critical non-conformities, the Verification Body shall withdraw the certificate after identifying the non-conformity with immediate effect. The Verification Body must immediately inform VISEC of the withdrawal of the certificate. The site may resume its enabled status when it demonstrates compliance.

Applicable only to VISEC Protocol compliance shipments.

Critical nonconformities

- (1) They have a severe impact, are systematic and irreversible and/or intentional. They lead to the rejection of the operation (specific shipment).

In case of non-conformities in the shipment instances, they are considered critical. Minor or major non-conformities are not allowed for the clearance of a shipment under VISEC guidelines. Non-conformities imply the direct cancellation of the shipment for the purposes of the VISEC protocol rigorously.

12. Terms and Conditions (See Annex 6)

VISEC shall establish terms and conditions of use (hereinafter, "the Terms", "the Conditions", "T&C"). They shall be used by those who use or otherwise deal with the VISEC MRV System.

13. Annexes (See Annexes Document)

14. Glossary

Local Enforcement Authorities (LEAs)
Conservation Plans (CP)
Sustainable Management Plans (PM)
Formulation Projects (FP)
Land Use Change Plans (PCUS).

Intermediate stockpiles: intermediate or final biomass (soybean, soybean oil and biodiesel) collection points, including intermediate elevators, transshipment ports and storage facilities, among others, that store or transship biomass temporarily and deliver it to the next step in the chain.

Canopy cover: As developed in Pastur et al. (2023), canopy cover refers to the vertical percentage projection of trees above the forest floor (e.g., leaves, branches, shafts), and is often influenced by the surrounding landscape (Chianucci 2020) (e.g., relief or topography). Tree cover is not an indicator of stable values, but changes throughout the different successional stages described above or throughout the year, both for deciduous species (e.g., complete loss of leaves in times of drought or winter) and evergreen species (e.g., partial loss of leaves) (Toro Manríquez 2019). The following image was taken from the same work by Pastur et al. (2023), it exemplifies different % tree cover:

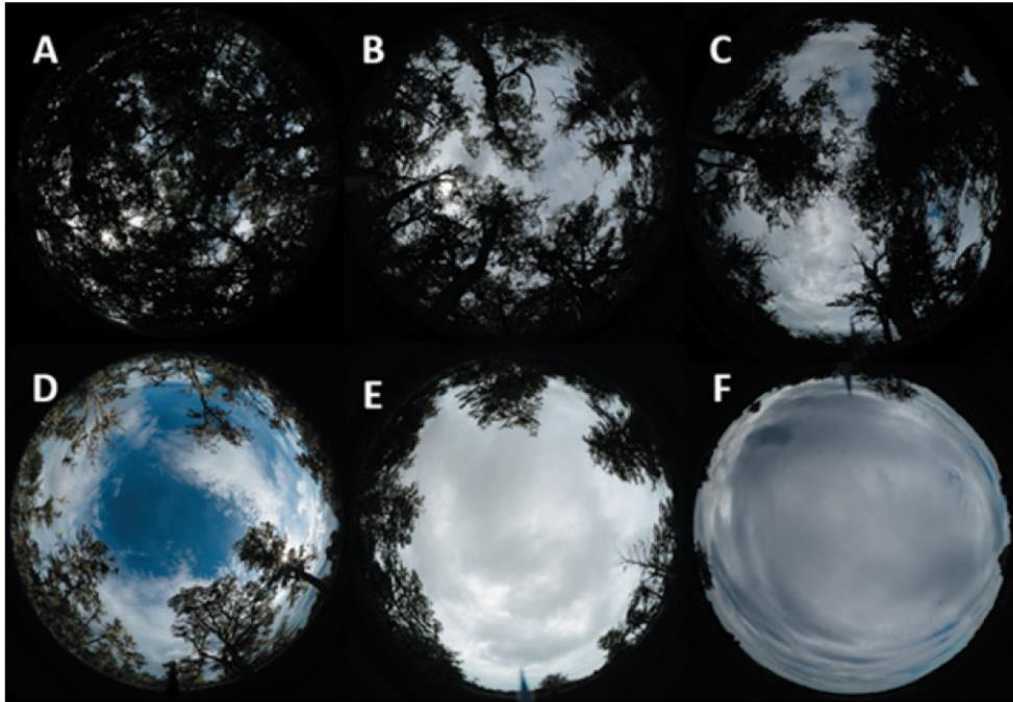


Figura 1. Ejemplo de distintas coberturas arbóreas en rodales naturales (A=93%, B=77%, C=62%) y bajo manejo o transformaciones de origen antrópico (D=35%, E=22%, F=7%) de bosques de *Nothofagus antarctica* en Tierra del Fuego. Análisis de fotos hemisféricas mediante el software Gap Light Analyzer (Forest Renewal, USA).

Deforestation: According to FAO definitions and considerations, deforestation is the conversion of forests to another type of land use regardless of whether it is human-induced or not, forest being understood as defined above (at least 0.5 ha or equivalent and trees of at least 5 m in height and 10% canopy cover or with the potential to reach them and/or forest curtains of at least 20 m in width and equivalent in area). A decrease in cover below the 10% limit is considered deforestation. Although the definition clarifies that conversion is independent of human action, FAO specifies that in the event of a natural disaster (e.g. a forest fire), if the affected forest is allowed to regenerate and the disturbance is not used for conversion to agricultural or other non-original use, it would NOT be considered deforestation. In the event that the change caused by the natural disaster results in the detection of an agricultural use in that area, it will be considered as deforestation. Additionally, a change from a forest to an agricultural use such as the introduction of an agroforestry system, even if it does not involve clearing, will be considered deforestation. The term excludes, in the case of forest plantations, areas where trees have been removed as a result of harvesting or logging, and where the forest is expected to regenerate naturally or with the help of silvicultural measures. Also, under consideration of the regulation, the removal of trees for infrastructure works such as roads, buildings and works for renewable energies are excluded from this regulation.

Forest Degradation: In line with European regulation, forest degradation is defined as structural changes in forest cover that, without implying a decrease in the % of forest cover or the conversion of forests to agricultural use (**defined as deforestation**), take the form of:

- Conversion of primary forests (forests of native species with no evidence of human intervention) or naturally regenerating forests (native/autochthonous species regenerated naturally or where it cannot be distinguished whether regeneration was natural or by plantation) to forest plantations.
- Conversion of primary forests to reforestation forests (forest predominantly composed of trees established by planting or seeding).

This definition is functional to the extraction of forest resources (timber and by-products made from timber).

Cut-off date: Date as of which deforestation or forest degradation of a production unit means that it does not comply with the commitments of no deforestation or no forest degradation, respectively.

Legality: In addition to the levels of analysis established in Annex 7, the requirement of legality with respect to socio-environmental aspects will be given by the adherence to the Argentine Legislation in relation to:

- Protected Areas: Respect for the different areas that make up the Federal System of Protected Areas, considering each jurisdiction's own regulations. This includes areas included in: the National System (National Park, National Reserve, National Monument, Strict Nature Reserve, Wild Nature Reserve and Educational Nature Reserve); the Provincial Systems (Provincial Park, Provincial Reserve, Nature Reserve, Multiple Use Reserve, Wildlife Refuge, Natural Monument (provincial), Protected Landscape, Municipal Reserve); as well as internationally recognized areas (Biosphere Reserve, Ramsar Site and World Heritage Site). The overlapping of the productive unit and soybean production occurring within the limits of these areas, when it is not a permitted activity, will not comply with the legality requirement. In the case of Private Reserves, given the intrinsic characteristic of their name of being private property, they may be located within the limits of a declared productive unit. In these cases, the legality of the reserve would be respected, as long as no deforestation is detected.
- Native Forests: Compliance with National Law 26.331 on Minimum Standards for the Environmental Protection of Native Forests, an instrument that sets the minimum mandatory standards for forest protection in Argentina, as well as the provincial laws that regulate the Territorial Management of Native Forests (OTBN) in each jurisdiction. National Law 26.331 orders each province to classify its native forests considering the following categories:
 - Category I (red): Sectors of very high conservation value that should not be converted. Includes areas that, because of their locations relative to reserves, their connectivity value, the presence of outstanding biological values and/or the watershed protection they provide, merit their persistence as forest in perpetuity, even though these sectors may be habitat for indigenous communities and be the object of scientific research.
 - Category II (yellow): sectors of medium conservation value, which may be degraded but which, in the jurisdictional enforcement authority with the implementation of restoration activities, may have a high conservation value and may be subject to the following uses: sustainable use, tourism, harvesting and scientific research.
 - Category III (green): sectors of low conservation value that can be partially or totally transformed, although within the criteria of this law.

Based on these criteria, soybean production will not meet the legality requirement if such areas are located in areas containing forest:

- classified as Category I "red".
- classified as Category II "yellow"

Soy production that occurs in areas containing forests classified as Category III "green" forests will meet the legality requirement, subject to the presentation of the corresponding Land Use Change Utilization Plan (PCUS) required by law and authorized by the competent authority. Furthermore, there may be exceptional permits granted by the different provincial authorities that authorize activities in Category II (yellow). Such permits or authorizations can be presented in a timely manner for consideration.

For clarification purposes, VISEC does not act as an inspector and/or enforcement authority of national or provincial laws. VISEC recognizes the legality of what is established by the legislation and the administrative acts of the corresponding enforcement authority.

Traders: any natural or legal person who, in the course of a commercial activity, introduces the relevant products into the market or exports them.

Deforestation-free soybeans (DFS): deforestation-free (i.e. produced on land that was not deforested after December 31, 2020) and legal (i.e. in compliance with all relevant applicable laws in force in the country of production).

Conversion unit (processing plant): facilities where soybeans are processed to produce soybean oil and soybean meal and other by-products. These facilities may be oil crushers and/or processing plants. Conversion units will collect all the data from the previous steps in the chain.

The Productive Unit will be defined by the RENSPA number, so that different RENSPAs registered for the same establishment or property imply different Productive Units unrelated to each other. There is no concept of Polygon as such separate from the Producer, since it will be registered as RENSPA.

BIBLIOGRAPHY.

FAO (2020). Global Forest Resources Assessment 2020 - Terms and Definitions. <https://www.fao.org/3/l8661ES/i8661es.pdf>

Pastur, G. M., Amoroso, M. M., Baldi, G., Barrera, M. D., Brown, A. D., Chauchard, L. M., ... & Peri, P. L. (2023). What is a native forest in Argentina? Conceptual framework for a correct definition according to national institutional policies and available scientific knowledge. *Ecología Austral*, 33(1), 152-169.

MINIMUM BUDGETS FOR ENVIRONMENTAL PROTECTION OF NATIVE FORESTS - Law 26.331. <http://servicios.infoleg.gob.ar/infolegInternet/anexos/135000-139999/136125/norma.htm>