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1. Introduction

The Leading Harvest certification programs help organizations and consumers verify the truthfulness and accuracy of certain sustainability and environmental benefit claims. This document is intended to provide Leading Harvest certificate holders and applicants (herein referred to as "Program Users") with the necessary information to make accurate and appropriate statements and claims about the Leading Harvest certification programs and certified products traded by Program Users. This guidance is an integral part of the Leading Harvest certification program and is intended to accompany the Leading Harvest Traceability Standard and Leading Harvest Farmland Management Standard (including the Pasture and Livestock version) (collectively, the "Standards"). It complements claims guidelines found in Sections 2 and 3 of Leading Harvest Farmland Management Standard document.

These guidelines communicate the rules for marketing statements that reference or are based upon Leading Harvest, its certification programs, the Standards, or the Leading Harvest trademarks ("Controlled Claims"). They serve to protect the integrity of the certification programs by ensuring accuracy, clarity, consistency, and credibility of Controlled Claims. All Controlled Claims are subject to these guidelines and the reasonable directives of Leading Harvest including, but not limited to, modification and discontinuation of Controlled Claims that, in Leading Harvest's sole discretion, violate these guidelines and any applicable trademark license agreement.

These guidelines describe the types of claims that can be made by Program Users, the rules and requirements for making such claims, provide examples of permissible claims, and describe the approval and monitoring process. These guidelines are for illustrative purposes only and are not intended to be exhaustive. Moreover, whether a Controlled Claim or type of claim is permissible may vary depending on product type, context, and other factors. Leading Harvest reserves the right to approve or disapprove, or require modification or discontinuation of, any Controlled Claims at any time.

The Leading Harvest trademarks are subject to trademark license agreements and may only be used under written license from Leading Harvest. Any unauthorized use of the Leading Harvest trademarks is strictly prohibited.

2. Overview of Claims System

2.1 Categories of Claims

These guidelines establish an assurance framework for three categories of claims: Farmland Claims, Product Claims, and Claims about Leading Harvest, all of which are categories of Controlled Claims. Except as otherwise specified in these guidelines, all Controlled Claims require approval by Leading Harvest prior to use.

Program Users retain the right to make claims about their products or organizations that fall outside the scope of these guidelines, provided they do not reference Leading Harvest, the certification programs, its Standards, or the Leading Harvest trademarks, either directly or by implication ("Uncontrolled Claims").

2.2 Users and Eligibility

Only entities registered with or covered by a valid Leading Harvest certificate issued by an accredited and approved third-party certification body may make Controlled Claims.

3. Farmland Claims

3.1 Types of Farmland Claims

Farmland Claims are statement(s) made by certified Program Users about their commitment to managing farmland in accordance with Leading Harvest Standards.

There are three types of Farmland Claims:

- **Commitment** claims, where the Program User communicates that they are an enrolled participant in a Leading Harvest Standard.
- Action claims, where the Program User communicates what specific practices it
 has put in place under a Leading Harvest Standard to help them achieve their
 commitments.
- **Performance** claims, where the Program User communicates specific outcomes that were achieved from their participation in a Leading Harvest Standard.

Action and Performance claims require Leading Harvest approval prior to use. Commitment claims can be made by an enrolled Program User without prior approval as set forth in Section 3.2.

3.2 Commitment Claims

A Program User who wishes to make a public claim regarding their participation in a Leading Harvest Standard must have successfully completed at least partial certification to a Leading Harvest Standard by a recognized accredited certification body and submit a public audit summary in accordance with the applicable Standard.

Program Users who have completed at least partial certification and submitted their public audit summary may make the following Commitment Claims, as applicable, without prior approval:

[We][Program User] have/has committed to certifying XX% of our/its Farmland Acres according to the Leading Harvest [Standard Name] by [Year].

XX% of Farmland Acres (or Hectares) Enrolled in the Leading Harvest [Standard Name].

XX% Farmland Acres (or Hectares) Certified to the Leading Harvest [Standard Name].

Commitment Claims other than those listed above require prior approval by Leading Harvest.

3.3 Action and Performance Claims

All Action and Performance Claims must be approved by Leading Harvest prior to use, whether on product packaging or off packaging, such as on the Internet, social media, or other channels or media.

A Program User who wishes to make a Action and Performance Claims must (i) have successfully completed at least partial certification to a Leading Harvest Standard by a recognized accredited certification body; (ii) submitted a public audit summary in accordance with the applicable Standard; and (iii) possess competent and reliable scientific evidence to substantiate any proposed claims.

4. Product Claims

Product Claims are statements that a product contains certified goods/ingredients and meets the Leading Harvest Standards. All Product Claims require Leading Harvest approval prior to use.

The use of Product Claims is restricted to Program Users that hold a valid certificate to the Leading Harvest Traceability Standard, demonstrate verified traceability to substantiate certified content, and meet approval requirements. Logo use intended for the European market will be subjected to additional requirements to meet relevant regulations.

4.1 Traceability Requirements

In alignment with ISEAL Alliance, Leading Harvest distinguishes between claims based upon strict physical segregation traceability systems versus mass balance systems.

4.1.1 Physical Segregation Requirements

Leading Harvest allows for more specific Product Claims to be made where physical segregation systems serve to underpin the accuracy of the claim across the supply chain. Physical segregation ensures that certified products remain separate from non-certified products throughout the supply chain.

4.1.2 Mass Balance Requirements

Mass balance traceability allows mixing of certified and non-certified materials, with certified content tracked via accounting systems that are third-party verified. Leading Harvest requires Product Claims based on a mass-balance systems to use broader claims language such as 'supports the production of' or 'contributes to' in order to specify positive outcomes. Specific Product Claims language and phrases that establish a clear link between the claim and the actual product volume like 'this product contains...' or 'this product comes from a certified source' pose a higher risk to being false and are not allowed. See below sections for additional guidance and examples of Product Claims that may be made based on mass balance systems.

4.2 Single-Ingredient Products

A single-ingredient product includes only one crop or ingredient, for example a bag of apples or a bag of coffee, even where coffee may mix beans from different regions or varieties. A single-ingredient product is eligible to display the Leading Harvest trademark when it meets traceability requirements demonstrating accuracy and

transparency regarding the actual content (ex., "70% of the tomatoes in this soup comes from Leading Harvest certified farms in California").

Single-Ingredient Products using the mass balance traceability shall include 'certified using mass balance' as part of the text statement accompanying the trademark.

4.3 Multi-Ingredient Products

A multi-ingredient product includes more than one ingredient, of which at least one is Leading Harvest Certified and qualifying for claims use. An example is a bag of cookies where the sugar cane sourced is Leading Harvest Certified, and multiple other ingredients are not certified.

The Leading Harvest trademark and claims about multi-ingredient products must be clear to specify which ingredients are certified and the scope of the claim. A multi-ingredient product is eligible for Product Claims when at least one ingredient contained in the product is Leading Harvest Certified, and it meets traceability requirements demonstrating accuracy and transparency regarding the actual content (ex., "70% of the tomatoes in the sauce of this pizza comes from Leading Harvest certified farms in California").

4.4 Products Not Eligible for Product Claims

There may be cases when products may be sourced from Leading Harvest certified farmland but are not eligible for Product Claims. These scenarios may include:

- When the Traceability Standard requirements have not been met and only a Farmland Management Standard certification is valid. This scenario allows for B2B communications and Farmland claims only.
- When the total certified content of the multi-ingredient product is negligible on insufficient, a Product Claim is not permissible. A final determination about what constitutes a "negligible" or "insufficient" amount will be made during the claim review process but is more likely when the certified ingredient(s) represent a total volume / weight % of the final product that is less than 10%.
- Other cases determined by Leading Harvest on a case-by-case basis.

Figure 1. Claims Use Best Practices

Do This	Do Not Do This
Be clear and transparent about the part of the product or business that the certificate is valid for.	Do not make a claim about the whole product or business where the certification is valid for part of or an aspect of the business or product that is subject of the claim.
Do use language that focuses on the core attributes of the Leading Harvest program.	Do not make any statements about future performance. Do not make comparative statements of a product having a lower environmental impact or higher performance compared to another product.
Do check that the claims language is accurate and transparent to the actual focus of the farm management system (e.g., if the system targets are focused on water conservation and not energy conservation, do not make claims about energy conservation).	Do not make a claim of 100% certified status or other claims using absolute values or suggesting highest level of performance.
Do ensure that claims being made are factual and can be supported with documented evidence, such as Leading Harvest audit reports.	Do not make speculative claims that have no objective justification.

5. Claims About Leading Harvest

Program Users are permitted to make certain claims about Leading Harvest without obtaining prior approval from Leading Harvest. Claims about Leading Harvest are informational claims that provide general information about Leading Harvest, rather than about Program Users.

The following claims may be made about Leading Harvest without prior approval:

- Farming practices rooted in science for a more sustainable tomorrow.

 Leading Harvest certified farms have committed to 13 core principles of sustainable farmland management.
- **Grown with Purpose. Certified for Impact.** Leading Harvest certified farms have committed to 13 core principles of sustainable farmland management, helping deliver real results on real farmland.
- **Buzzing with Good.** Leading Harvest certified farmers adopt practices to protect pollinators to grow food that sustains us all.
- **Global Reach. Local Impact.** From vineyards to row crops, Leading Harvest works across geographies, crop types, and operations of all sizes globally adaptable, locally impactful.
- Leading Harvest is based on 13 core principles of sustainable farmland management systems that allow farmers to identify areas for improvement and demonstrate positive outcomes on the farms that grow our food.
- Leading Harvest is an independent 501(c)(3) non-profit charitable organization that is the sole organization that oversees third-party certification to the Leading Harvest Farmland Management Standard and Leading Harvest Traceability Standard.

Claims about Leading Harvest other than those listed above require prior approval by Leading Harvest.

6. Claims Review, Approval, and Monitoring

6.1 Claims Review and Approval

Once an entity receives their certificate from an accredited and approved certification body, the claims approval process can be carried out. Program Users are required to submit a written Claims Approval Request (see form in Table 6 below) via email to assurance@leadingharvest.org for authorization for the use of any claim requiring approval.

Requirement: Printing of promotional materials, release of products to the market with on-product logo use, or disclosure of claims in the public domain before claims are approved is not allowed. A License Agreement for approved claims is issued at the end of the approval process and signals the claims user that the claim is valid and may be used in the public domain.

6.1.1. Claims Approval Requests shall be submitted using the following form:

	Claims Approval Request Submission Date		
Company Information	Name of Licensee Organization		
	Primary Contact Name		
	Title		
	Email		
	Phone (optional)		
	Leading Harvest Certification and Commercial Relationship (Attach documents)		
	Type of claim (e.g., product, farmland, claim		
	about Leading Harvest)		
	Exact wording of the proposed claim		
	Use of Leading Harvest Trademark (y/n)		
	Traceability system used (e.g. controlled mass		
Claims	balance, physical segregation)		
Information	Total product Volume by Ingredient (Attach		
	document)		
	Intended regional market(s) for the claim		
	EU market only: claims use is verified to comply		
	with green claims regulation (y/n)		
	Other, as applicable		

Once received, the Leading Harvest assurance team will conduct an internal review of each Claims Authorization Request to verify traceability requirements are met and claims are accurate. Program Users can expect to receive an approval or issuance of notification of required changes within 5 to 7 business days of submission. Once authorization is granted, the terms of use will include:

- 1. Approval date and duration of claims approval
- 2. Confirmation of exact claims approval language and scope of on-product trademark use
- 3. Licensing agreement
- 4. Requirements for claims monitoring activities (see Monitoring section below)

Program Users must complete the licensing agreement and pay required licensing fee prior to making the approved claims public. Issuance of the license does not oblige the licensee to use the Leading Harvest trademark on certified product.

6.2 Monitoring of Claims Use

When requested, Program Users must make available to Leading Harvest a record of all promotional materials, documentation, website pages, product packaging examples, and marketing/communications with Leading Harvest claims.

Program Users must promptly notify the Leading Harvest team at assurance@leadingharvest.org any time there have been changes made to existing, approved claims as well as when there have been any challenges to the claims, whether by a third party or regulatory agency, such as an alleged violation of the FTC's Green Guides. Program Users must also promptly notify Leading Harvest of other changes such as supply chain partners using claims or production processes that may invalidate Product Claims. If there are changes that may cause the claim to be inaccurate, misleading or otherwise invalidate the claim, the Program User must submit a new Claim Authorization Request Form and obtain approval.

The Leading Harvest team will conduct random, periodic monitoring of claims, which may include market surveillance, requests for additional information from Program Users, and/or following up on complaints or questions of misuse. These efforts will be reported to stakeholders on a periodic basis.

Leading Harvest maintains a list of certified Program Users on their <u>website</u>. Questions around label use or concerns or complaints regarding label misuse may be reported to Leading Harvest via <u>assurance@leadingharvest.org</u>.

6.3 Uncontrolled Claims

The Leading Harvest certification program provides a flexible, outcome-based framework that focuses on leveraging farm management systems and continuous improvement processes towards outcome-based performance. Program Users may seek to communicate outcome-based results in ways that are not directly controlled by Leading Harvest, such as reporting specific metrics in corporate sustainability reports. Where the statements do not directly link or imply performance outcomes to the Leading Harvest program and where the claims language falls outside the Leading Harvest assurance system, the claims language does not require Leading Harvest approval. An example of an Uncontrolled Claim is a statement reporting total waste diversion data, which may be an outcome of farmland management practices, but is not verified as part of the certification process.

6.4 Withdrawal of Claims Use

Suspension or withdrawal of claims use and/or termination of the licensing agreement may occur any time in the case of non-conformity to the guidelines and agreements. This may include failure to meet critical criteria resulting in suspension or withdrawal of certified status. Leading Harvest will review claims use on a case-by-case basis where a certificate is suspended. Where a certificate is withdrawn, all types of off-product claims and on-product trademark use must cease. Where on-product trademark is in the market, Leading Harvest will determine a period of time for the claim to remain in the market. Where claim use simply expires with the terms of the certificate and claims approval, Leading Harvest recognizes a period of a maximum of 24 months for certified product with on-product claims to exit the market.

6.5 Exceptions

Leading Harvest recognizes that occasionally situations may arise that are outside the control of an organization and that these may have a bearing on the trade of certified product and use of claims. Exceptional circumstances, such as force majeure, temporary supply shortages or trade disruptions, may create difficulty in meeting Leading Harvest policies. In these cases, applicable Program Users promptly shall contact Leading Harvest for approval of its Temporary Exception. Temporary Exceptions may be granted for a period up to six months and may maintain or alter the claims and label use conditions of the original approval.

7. Glossary

Assurance – The process of verifying compliance with certification standards through audits, monitoring, and oversight by the scheme owner, Leading Harvest, and accredited certification bodies (ISO 17065).

Certification Body – An accredited third-party organization conducting audits to verify compliance with Leading Harvest standards.

Controlled Claim – A claim that references or is based upon Leading Harvest, its certification programs, the Standards, or the Leading Harvest trademarks.

Mass Balance – A traceability method used to track certified Leading Harvest products throughout the supply chain while accounting for the mixing of certified and non-certified materials. This approach relies upon a weights and measures system to account for and reconcile inputs and outputs of certified product, ensuring that overall balance of certified product meets sustainability and traceability standards.

Physical Segregation – A traceability method in which certified products or materials are physically separated from non-certified products or materials throughout the entire supply chain, from production to final sale. This ensures that the certified product remains distinct and unmixed, allowing for accurate and verifiable claims about its certified status, as verified through audits by accredited certification bodies.

Program User – An organization or entity that holds a valid Leading Harvest certificate and licensee agreement or a supply chain trading partner covered under and existing licensee agreement. Program Users are part of the Leading Harvest system.

8. References

- 1. ISO 14024:2018(E) Environmental labels and declarations Type I environmental labelling Principles and procedures 2nd Edition. Switzerland.
- 2. ISO 17000:2020(E) Conformity assessment Vocabulary and general principles 2nd Edition. Switzerland.
- 3. ISEAL, Sustainability Claims Good Practice Guide, May 2015
- 4. ISEAL, Impact and outcomes claims and communication guidelines, March 2016
- 5. ISEAL, Chain of Custody Models and Definitions, v1.0, September 2026
- 6. World Wildlife Fund, Principles to Actively Endorse and Recognize Effective and Credible Standards and Certification Schemes https://d2ouvy59p0dg6k.cloudfront.net/downloads/wwf_principles_for_standards _and_certification_schemes__external_version.pdf
- 7. EUGCD, 'European Commission. EC 2023/0085 (COD); "12.3.2024 Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on substantiation and communication of explicit environmental claims (Green Claims Directive)"

9. Annex: EU Green Claims Directive Checklist

Checklist of explicit claims requirements for use within the European Union.

(Note: This checklist references the draft EUCGD and should be updated upon full adoption of the proposed law.

- Verify if environmental claims are specific and substantiated, not vague or generic. (such as 'eco-friendly', 'eco', 'green', 'nature's friend', 'ecological' and 'environmentally correct').
- Claim must specify whether it's the whole product or part of it, or if the claim concerns all activities of a company or only some of them and communication of the claim only covers aspects that are substantiated.
- ➤ Ensure claims are based on widely recognized scientific evidence and proven methodologies. Use peer-reviewed studies or best practices to validate claims. Take account of the existing international standards that are relevant to the claim that is made, such as ISO or CEN/CENELEC standards.
- ➤ Confirm claims consider the full life cycle into account to assess the environmental performance (e.g., production to disposal) and highlight significant environmental impacts.
- Check if claims align with legal requirements and are presented clearly, using accessible language for traders.
 Claim must not merely communicate equivalency to requirements imposed by law; claim language denotes performance beyond common legal requirements.
- Confirm that claims language provides information whether the product or company subject to the claim performs significantly better than in common practice (i.e., demonstrated higher performance).
- Ensure that the claim considers Impact Trade-Offs checking that a positive achievement has no harmful impacts on climate change, resource consumption and circularity, sustainable use and protection of water and marine resources, pollution, biodiversity, animal welfare and ecosystems.

- Claims language reports greenhouse gas offsets in a transparent way:
 - a. it separates greenhouse gas emissions offsets from greenhouse gas emissions.
 - b. it specifies whether the offsets concern emission reductions or removals, and
 - c. it provides information on the quality of the offsets
- ➤ Ensure that claims are based on collection of primary information (directly measured or collected by the company) or credible secondary data (literature studies, LCAs, engineering studies and patents).
- Confirm that comparative environmental claims comply with the following:
 - 1. the use of equivalent information for the assessment of environmental impacts, aspects or performance of compared products;
 - 2. the use of data generated or sourced in an equivalent manner, i.e. same methodology
 - 3. the most significant stages are taken into account for products and traders compared;
 - 4. the assumptions used for the comparison are consistent for all the products and traders compared.
 - 5. for comparative claims on improvement of impacts explain the baseline year and the impact of improvement on other aspects and impacts along a clear time boundary.
- ➤ Check that if the environmental claim is related to future environmental performance of the product or trader, that it shall include a time-bound commitment for improvements inside own operations and value chains.
- Report cumulative environmental impacts (e.g., emissions, resource use) using aggregated indicators established by EU law.
- ➤ Ensure environmental data (e.g., standards, impacts) is available in a physical or digital format, per EU law.
- Do not use labels presenting a rating or score for a product or company based on an aggregated indicator representing cumulative environmental impacts, unless they have been awarded under environmental labelling schemes set up under EU law.

- ➤ Ensure that only environmental labels awarded under environmental labelling schemes established under Union law may present a rating or score of a product or trader based on an aggregated indicator of environmental impacts of a product or trader.
- No label shall be displayed on a product, which is not based on a certification scheme or not established by public authorities. Check that labels meet minimum transparency and credibility requirements.
- Prohibition of sustainability labels not meeting minimum transparency and credibility requirements
- > Ensure labels are verified by a third party and meet certification requirements before use.
- ➤ Ensure that chain of custody claims match the model used, such as segregation, mass balance, etc.
- Ensure claims need to adhere to regulations in the countries where claim is made