

	<b>REGULATIONS FOR THE SUSTAINABLE PROTECTED FIELDS OF WHEAT PRODUCTION</b>	Rev:04
		Date: 09/14/2020

## SUSTAINABLE PROTECTED FIELDS OF WHEAT PRODUCTION REGULATIONS

AGRICULTURAL COMPANY / OWNER: .....

BASED IN: .....

TOTAL AGRICULTURAL COMPANY HECTARES (UAA): .....

HECTARES CULTIVATED WITH SOFT WHEAT:.....

LAND LOCATED IN THE MUNICIPALITIES OF: .....

CULTIVATED VARIETY .....

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## CHAPTER 1. PRODUCTION SPECIFICATIONS

### 1 LAND

#### General characteristics

The land must be chosen in such a way as not to undergo external contamination. A distance of 1 km must be maintained from motorways or high-traffic roads, from production plants at environmental risk (such as thermoelectric plants, petrochemical plants, incinerators, etc.), from landfills and industrial and urban waste treatment plants.

Any other potential source of pollution that could have an impact on the plot in question must be evaluated and formalized through a risk analysis.

#### Plot characteristics

The piece of land considered must be identified at a geographical level, indicating the surface, the neighboring crops and, if necessary, the cadastral references; a plot map must be prepared.

#### Agrochemical experiments

No agrochemical trials can be carried out within the plot in question, nor in any other plot belonging to the same farmer.

#### Registrations

Information relating to production activities must be recorded in the “Quaderno di Campagna” (electronic or paper).

### 2 CROPS ROTATION

The cultivation of soft wheat must be included in a five-year crop rotation with a maximum of forage crops, legumes, industrial horticultural crops, oilseeds with the aim of reducing the environmental impact and the development of Fusarium. The rotation allows the reduction of greenhouse gas emissions due to the possibility of using smaller quantities of fertilizers.

If the previous crop is corn or sorghum, it is essential to bury the stubble with deep plowing of the soil to reduce the inoculum due to the mycotoxin risk.

However, on a case-by-case basis, the company context must be assessed and the processing methods that best suit the territory, climate, type of soil and the cultivation process in progress must be applied.

### 3 SOWING

#### General characteristics

Sowing must be carried out with technical means suitable for use and subjected to adequate maintenance. The sowing density must be balanced in such a way as to avoid excessive plant density but at the same time maintain an adequate crop yield.

#### Seed characteristics

The seed must be tanned using the active ingredients indicated in Positive List of Phytosanitary Treatments (Annex 1) and must not contain neonicotinoids. The use of seed from replacement or re-use by the company is not authorised. The type of seed used must also be indicated, which must be certified NON-GMO.

#### Variety choice

The choice of the crop variety, (Mycotoxin evaluation scheme for recommended varieties Annex 2), must be carried out taking into account:

- the necessary technological requirements requested by the transformer;
- tolerance to mycotoxinogenic fungi;
- of the most suitable varieties for the cultivation environment in question;

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## 4 FERTILIZATION

### **General characteristics**

The fertilizations to be carried out during cultivation must take into account the actual needs of the crop and the final objective of yield and quality of the crop, by means of a prescription from a qualified technician. The technical means for spreading fertilizers must be in suitable conditions for their use and for correct application on the crop.

Correct fertilization is the key to obtaining quality in terms of yields and proteins. Maximum efficiency in the use of nitrogen must be guaranteed in relation to rotation, the natural availability of the soil, possibly verified with a laboratory analysis, and the climatic trend. Nitrogen fertilization has its greatest efficiency with a fractionated distribution with the crop in progress, with the awareness that the contributions in tillering and at the start of the harvest increase productivity while those at the end of the harvest - at the beginning of the cask increase the protein content.

All those companies included in "precision-farming" projects that use variable fertilizers using equipment connected to geo-satellite systems (GPS) have an absolute advantage. All the solutions that the market offers which envisage the use of new generation products with a lower environmental impact and which have in any case had confirmation of their effectiveness in the field, must be constantly evaluated.

### **Prohibited Products**

Fertilizers deriving from the composting of urban and industrial waste or from urban and industrial waste treatment plants are prohibited.

The use of digestates from biodigestors/biogas production plants (even if belonging to the same company) as fertilizer and/or soil conditioner is prohibited.

The use of ammonium sulphate deriving from landfill leachate is prohibited.

The use of fertilizers and soil improvers deriving from leather or leather processing is prohibited.

For all other fertilizers (organic and non-organic) a risk assessment must be carried out to verify that their application does not represent a danger in terms of chemical (e.g. heavy metals) or microbiological (e.g. immature manure) contamination on the final crop.

In particular, it is MANDATORY to check with the producer of the organic fertilizer, the batch, the composition and the compliance of the fertilizer with the regulations in force and the evidence must be recorded as required by the Fertilizers legislation.

### **Fertilizer storage**

The storage of fertilizers is carried out in a suitable area (dry, clean and covered) and which is not a potential source of pollution of the crop and the surrounding environment.

### **Registrations**

Information relating to fertilization is recorded in the Quaderno di Campagna, reporting at least:

- Date/quantity/commercial name/unit of fertilizer applied/reference lot

The information must be made available to the Pivetti Agronomists at least at the time of collection.

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## 5 IRRIGATION

### **General characteristics**

If the nature of the crop and/or the need for cultivation makes it necessary, irrigation interventions must be provided. The technical means used for irrigation must be in an adequate state of maintenance and to ensure the effectiveness of the intervention in all areas of the field.

### **Water features**

The water used for irrigation operations must not represent a source of contamination for the crop in question. In particular, the use of urban waste water is prohibited, even if subjected to purification treatments.

### **Registrations**

Any irrigation treatment carried out must be recorded in the Quaderno di Campagna, reporting at least:

- Date/volume of watering/origin of water used/method of distribution.

## 6 PHYTOSANITARY DEFENSE

### **General characteristics**

The phytosanitary treatments must be carried out only following the effective need, with the exclusive use of the products included in the Positive List of Phytosanitary Treatments (Annex 1).

This list is issued/updated by the Agronomists annually. Extreme attention must be paid to attacks by aphids and bedbugs, the latter now in a phase of considerable expansion also in the project areas and which are creating many problems for the milling industry. Any use of plant protection products, not included in the Positive List of Phytosanitary Treatments (Annex 1), they can be waived with the authorization of the Pivetti agronomists for obvious and extraordinary needs. As far as the company use of glyphosate-based products is concerned, it is prohibited between sowing and harvesting and in any case it is recommended not to use the product in a generalized way in too low doses but rather to work to avoid its use where possible and use correct dosages (label) where there are no valid alternatives.

### **Drift of treatments**

An assessment must be made (also in collaboration with the Pivetti agronomists) of the risk relating to the danger of contamination from drift from phytosanitary treatments carried out in the neighboring fields or in the area close to the field. The findings that emerged are in the Campi Protetti Sostenibili campaign notebook held by Molini Pivetti.

In particular, the following must be taken into consideration:

1. Presence/absence of tree crops at high risk of drift (orchards-vineyards);
2. Presence/absence of herbaceous crops on which treatments with a high volume of dispersion are carried out or with technical means that can cause risks of drift (for example stilts or airplanes);
3. Presence/absence of herbaceous crops with low drift risk;
4. Presence/absence of hedges that can limit the drift effect;
5. Presence/absence of farm roads/headlands/etc. which can increase the distance between the source of pollution and the parcel in question.

Formal evidence must be given of the findings emerging from the above risk assessment with related corrective actions if necessary, which may include:

1. Complete exclusion of the field;
2. Creation of buffer zones within the considered field.

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### **Execution of phytosanitary treatments**

The farmer is responsible for carrying out the necessary preventive actions aimed at avoiding contamination of the product by unauthorized pesticides and residues in the sprayers from previous applications (suitable washing of the machines, correct maintenance and calibration). This responsibility extends to the farmer even in the case of treatments carried out by contractors. Formal evidence must be given of which treatments have been carried out by subcontractors and the subcontractor's personal data must be indicated.

Any phytosanitary treatment must be recorded in the Quaderno di Campagna, reporting at least:

- Date, adversity, trade name, active ingredient, dosage, equipment used, performer.

### **Storage of plant protection products**

The storage of plant protection products must be arranged in suitable structures that comply with current legislation, and in particular that are:

- Equipped with lock;
- With adequate non-absorbent shelving;
- Able to contain any spills;
- Illuminated;
- Equipped with adequate fire-fighting equipment and adequate ventilation;
- Equipped with equipment to intervene in the event of a spill.

Plant protection products must be preserved in their original packaging.

The management and disposal of empty plant protection product packages must be done in such a way that it does not represent a risk for the crop and in accordance with current regulations.

## **7 COLLECTION - TRANSPORT TO THE STORAGE CENTER/MILL**

### **General characteristics**

The collection must be carried out in the strictest respect of the suspension times established by legislative provisions or regulations on the subject following any treatments carried out.

The harvesting means (combine harvester) must be in suitable conditions to be able to carry out the harvesting operations correctly and must be adjusted and cleaned in such a way that it cannot represent a source of pollution of the harvest: particular attention must be paid to the harvesting with equipment that is also used for crops constituting allergens (Soy).

Responsibility for correct execution also extends to the farmer in the case of treatments carried out by subcontractors.

### **Means of transport-traceability**

The means of transport used to transfer the crop from the field to the storage centre/mill must be suitable to prevent the risk of cross contamination. In particular it must:

- Be properly cleaned (dry or wet) and checked before use and must be free of residues from previous crops;
- Not be registered in the National Register of Environmental Managers as regards the transport of waste, verifiable on the site <http://www.albonazionalegestoriambientali.it/>
- Not having previously transported substances that may pose a risk to the crop (including any allergens);
- Not having been treated with chemicals;
- Be adequately covered as soon as loading is completed;
- Have no oil/grease leaks;

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Transport to the storage centre/mill must be carried out as soon as the harvesting operations are completed; intermediate or temporary storage on the vehicle itself is not authorised. The collection must be suspended and the product delivered immediately if the climatic conditions do not allow the continuation of the collection operations.

The traceability of the operations carried out must be maintained; in particular the traceability elements (farmer-field-variety) must be provided to the storage centres/mills so that they can carry out the necessary incoming checks.

## 8 MYCOTOXINS

### General characteristics

For all wheat productions, an adequate mycotoxin risk assessment must be carried out (also in collaboration with Pivetti agronomists) based on the following aspects:

1. The selection and evaluation of the plots to be allocated to SUSTAINABLE PROTECTED FIELDS must be made according to the tolerance of the variety to the fungal attack, the cultural precessions and the ABSENCE/PRESENCE of CROP RESIDUES from the previous cultivation after the soil has been worked.
2. The information necessary to evaluate the single plot is collected according to the mycotoxin risk assessment grid (Mycotoxin evaluation scheme for recommended varieties Annex 2). The attribution of the risk class must be communicated at least 2 months before the start of the fungicide treatments, and is reported in the Campi Protetti Sostenibili campaign notebooks kept by Molini Pivetti.
3. Pivetti agronomists carry out field inspections throughout cultivation and in particular in the period between the beginning of flowering and harvesting, to verify that possible unfavorable climatic events may have worsened the actual risk of mycotoxin development.
4. Molini Pivetti envisages, if necessary, an analytical verification plan in pre-collection and on samples taken during collection with suitable methods and sensitivity.

## 9 INSPECTION VISITS OF MOLINI PIVETTI

### General characteristics

In relation to the requirements identified throughout the supply chain, Molini Pivetti guarantees compliance with the same as indicated in the specification through appropriate inspections by the Agronomists. The minimum information required to assess the suitability of the parcel and/or farmer are those indicated in the form "Inspection visit to SUSTAINABLE PROTECTED FIELDS farms" (Annex 3). In the event of non-compliance, a formal report is made by completing the form "Non-Conformity Report" (R01/CP).

## 10 NON-CONFORMITY

Non-conformities, i.e. failure to comply with the requirements set out in this specification, must be managed by the manufacturer according to what is reported in PRO05/CP.

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## CHAPTER 2. REGULATING SUSTAINABILITY

### 1. INTRODUCTION

This document defines the commitments and obligations regarding the cultivation of soft wheat in accordance with the DTP of CSQA N.112.

The signing of this specification represents:

- the farm's commitment to ensure its application and compliance.

By signing this specification, the agricultural company undertakes to apply it in all its parts and to guarantee its compliance until it is given to the customer;

- the company also makes itself available to submit to the internal checks envisaged as part of the self-control system implemented by the head of the supply chain, as well as any checks by certification bodies and to provide the head of the supply chain with all the data and documentation necessary to verify the compliance with what was declared with the signing of this agreement. He also undertakes to keep all the documentation listed in the "Company File" point for at least 5 years;
- the attestation/self-declaration of compliance of the common wheat with all the requirements defined by the specification itself. By signing this document, the company assumes full responsibility for the truthfulness of the information provided and for the consequences deriving from false declarations. Measures will be taken against members who do not comply with the specification, once signed.

These specifications do not oblige the farm to deliver the entire harvest to the buyer but only the quantity to cover the contract, while still guaranteeing the mass balance of the quantity produced with the goods sold

### 2 REQUIREMENTS OF TRACEABILITY, SUSTAINABILITY AND NO GMOs

#### General characteristics

The application of a traceability system must be guaranteed which makes it possible to identify land, seeds, treatments and the quantity of finished product obtained in compliance with DTP 112.

Cultivation must take place on lands located exclusively on the national territory and which have not undergone changes in land use in the last 5 years.

Only the use of GMO-free seed purchased from seed companies or in any case certified is permitted.

It is necessary to demonstrate the regularity of the practices for submitting the single CAP application and of all the financing activities that may be requested.

The following documentation must be presented upon request:

1. invoices for the purchase of seed declared GMO free;
2. precise identification of the cultivated lands through suitably specified cadastral data including the surfaces;
3. register of fertilizations, treatments and processes.

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The certifying body or Molini Pivetti must guarantee access to one's company during cultivation or after the harvest, in any case only for the data referring to the current campaign and subject to contractual constraints.

Any non-compliance, of any kind, must be promptly communicated and it is necessary to be able to physically keep the product separate, just as it is necessary to keep the wheat produced according to this specification divided from the conventional one.

The land must not be part of areas subject to legal constraints regarding the protection of nature or the conservation of ecosystems and/or rare species (Natura 2000 Network Area). If part of the company's land is located in such areas, all the constraints must be respected, highlighting them in a specific report.

### 3 HEALTH AND SAFETY IN THE WORKPLACE

#### **General characteristics**

All statutory occupational safety and health requirements are in full compliance, an employer is identified and documented risk assessment of health and safety hazards to workers is available. Training activities on these aspects are regularly carried out and contractors and visitors are made aware of the relevant safety procedures.

### 4 MANAGEMENT OF WORKERS AND EMPLOYMENT CONTRACTS

The company is aware of all legal obligations regarding the management of workers and related contracts.

#### **Child labor**

Documents and records relating to all the workers employed are present in the company (identity, suitability, age and contractual conditions)

In the event that adolescents are employed for educational or professional training reasons, those in charge of their training (TUTORS) must be identified who have the appropriate demonstrable skills also in the field of health and safety and a clear training program must exist for the period of the relationship of work.

In the case of school-age children living on the farm, the organization must demonstrate its commitment to ensuring that all children have free access to compulsory schooling.

However, child labor must not be used in the production of purchased goods or services.

#### **Forced and compulsory labour**

The regular employment contracts are applied and copies are present in the company for each worker signed by both parties containing the minimum information required by law: identity of the signatories, place of work, date of commencement of the employment relationship, duration, classification, level, qualification, tasks and any reference to the CNL applied.

In the event that specific services such as canteen or accommodation are made available to the worker, the organization must provide evidence of the workers' free access to this service without the obligation to attend, and therefore to pay, by the worker.

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Wages are duly recorded with the payment of the entire amount of the salary and no undue deductions are made on the salary.

All workers are aware of the procedures for withdrawing from the relationship and therefore aware of the freedom to resign if they wish as well as the compensation due upon dismissal. Furthermore, the necessary control tools must be applied to ensure that any suppliers do not use compulsory or forced labour.

All documentation must be available to workers, even in languages they understand.

### **Freedom of association and collective bargaining**

The company must guarantee and respect the workers' right to join trade unions or to elect a representative for collective bargaining with the company. All must be highlighted with the presence in the company of the minutes of appointment/election of the workers' representative with identification of the name of the person elected.

It is the company's duty to inform the workers of the specific procedures to allow them the opportunity to make reports or to express suggestions in complete anonymity, indicating the figures involved and specifying the procedures for taking responsibility by the company.

Participation in trade union activities by workers must not be subject to discrimination and therefore the appropriate spaces for the activities and the relative permits for representatives must be made available.

### **Discriminations**

The needs of workers connected to cultural and religious practices must be respected in respect of company activities.

### **Working hours**

The system for recording working hours (including overtime) must exist and be transparent, documented and in line with the provisions of the CNL.

### **Salary**

The payment of wages and overtime, with the envisaged increases, are documented in the pay slips and in the related accounting records as required by law in a manner consistent with the working hours and overtime worked, with the related justifications or deductions from wages for any absences or services enjoyed based on the attendance register.

The regularity of the payment of wages must correspond to the provisions of the contractual clauses, also in the documents relating to at least the previous 24 months.

Wage withholdings for disciplinary purposes cannot be made unless legally recognised.



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**Statement of NOT fulfilled or NOT applicable requirements**

In this space the company must declare whether there are requirements that are not applied or not applicable providing suitable explanation

**Statement of NOT fulfilled or NOT applicable requirements**

In this space the company must declare whether there are requirements that are not applied or not applicable providing suitable explanation

**For acceptance**

**Date,** \_\_\_\_\_

<b>Farm</b>	<b>Molini Pivetti</b>
(stamp and signature)	(stamp and signature)