

1、 Page 81 - Industry Description

“Large industry operators typically rely on contract or independent farmers to supply animals and may have varying degrees of control over their operations”

This situation in China are different, especially in dairy industry. The top dairy industry operators in China mainly operate dairy farms by themselves. For example, the first two largest operator Youran Dairy and Modern Dairy raise 20% of the dairy cows in China. Also other leading operators owns the dairy farms by themselves.

2、 Page 109 – FB-MP-160a.9.

“1.1 A nutrient management plan is a documented management practice that addresses the generation, collection, treatment, storage and agronomic use of manure.”

The definition of “Written nutrient management plan” is not accurate. In practice, only the this kind of plans/reports that have been evaluated by the authority or government will be meaningful and performed accordingly. Like in China, environment impact report which is prepared by the farm operator and containing manure processing solutions will be evaluated and accepted by the authority or government. So we suggest the description may be changed to bellowing.

“A nutrient management plan which was already passed the authority or government review is a documented management practice that addresses the generation, collection, treatment, storage and agronomic use of manure .”

3、 Page 131 - FB-MP-430b.1.

“An entity shall disclose (2) the percentage of its sourced animal feed, by weight, it has determined to be deforestation- or conversion-free.”

The agricultural products like corn and soybeans sourced to produce animal feed could be purchased from local supplier or global supplier in China. Generally it's practical and costless to gather the information of deforestation- or conversion-free for local procurement in China, because most of the agricultural products in China are deforestation- or conversion-free. For global procurement, getting the percentage of “deforestation- or conversion-free” is very complex, costly and dependent to global trader seriously. Sometimes even the global trader don't know the information of deforestation- or conversion-free for agricultural products they purchased globally. So currently for disclosing this metric related to global procurement may be very hard and cost a lot to do this.