

**Assurance Standing Committee  
21st Meeting (hybrid)  
Minutes of Meeting**

Physical venue: Novotel Platinum Bangkok, Thailand  
Zoom link: Zoom Meeting (<https://zoom.us/j/98028656480>)  
Date and time: 10 November 2024 at 6.14 pm – 8.48 pm (GMT+7)

**Members Attendance:**

<b>Growers</b>		
<b>Name</b>	<b>Organisation</b>	<b>Group Representation</b>
Anita Neville (Co-chair) (AN)	Golden Agri-Resources (GAR)	Indonesian Growers (IGC)
William Siow (WS)	IOI Group	Malaysian Growers (MPOA)
Florent Robert (FR)	SIAT SA	Other Growers (RoW)
Lawrence Quarshie (LQ)	Golden Star Oil Palm Farmers Association (GSOPFA)	Smallholders Group
Lee Swee Yin (LSY) <i>(alternate member)</i>	SD Guthrie	Malaysian Growers (MPOA)
<b>NGOs</b>		
<b>Name</b>	<b>Organisation</b>	<b>Group Representation</b>
Kamal Prakash Seth (Co-chair) (KS)	WWF International	E-NGO
Paul Wolvekamp (PW)	Both ENDS	S-NGO
Marcus Colchester (MC)	Forest Peoples Programme	S-NGO
<b>Supply Chain Sector / Downstream / Others</b>		
<b>Name</b>	<b>Organisation</b>	<b>Group Representation</b>
Lee Kuan-Chun (LKC) <i>(absent with apology)</i>	P&G	CGM
Olivier Tichit (OT)	Musim Mas Holdings	P&T
Michal Zrust (MZ) <i>(absent with apology)</i>	Lestari Capital	Financial Institution

**RSPO Secretariat Attendance:**

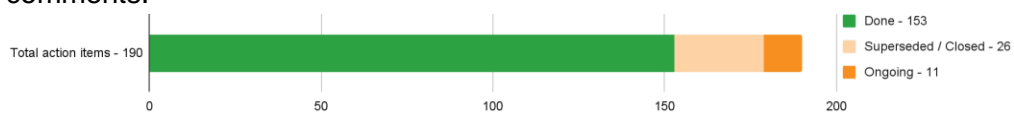
Name	Position
Aryo Gustomo (AG)	Director, Assurance
Yen Hun Sung (HS)	Director, Standards & Sustainability
Mohd Zaidee Mohd Tahir (ZT)	Head, Integrity
Muhammad Shazaley Abdullah (MSA)	Head, Certification
Leena Ghosh (LG)	Head, Human Rights & Social Standards
Jasmine Ho Abdullah (JHA)	Manager, Standard Design & Innovation
Freda Manan (FM)	Assistant Manager, Integrity
Haziq Ikram Rahmat (HI)	Executive, Integrity

**Other attendance:**

Name	Organisation	Role
Bilge Daldeniz (BD)	Proforest	Associate Director
Claire Reboah (CR)	Proforest	Principal Project Manager
Rebecca Smalley (RS) <i>(virtually)</i>	Proforest	Independent Researcher

*Note: To ensure consistency with the pre-read and agenda, the following minutes retain the numbering system but are ordered chronologically as delivered.*

Description	Action Points
<p>Before the meeting, the ASC shared a dinner, priming many discussions that took place after.</p> <p><b>1.0 Introduction</b></p> <p><b>1.1 Welcome Remarks</b> AN welcomed the members and announced that the Co-Chairs had decided to address “4.0 For Decision” before “3.0 For Discussion” to streamline the meeting. ZT then briefly shared the agenda.</p> <p><b>1.2 RSPO Antitrust Guidelines, Consensus-Based Decision-Making, Declaration of Conflict of Interest (Col)</b> ZT reminded members of the RSPO Antitrust Guidelines, ASC objectives, and</p>	

<p>the need to declare any Conflict of Interest (Col). None were declared.</p> <p><b>1.3 Acceptance of MoM from the 28 August 2024 Meeting</b>          ZT invited comments on the Q3 ASC meeting minutes (28 August 2024). A member requested an update on action item 177 regarding NewForesight's elaboration on the central fund model. FM confirmed that NewForesight had provided additional input from interviews for the delinking study, which the Secretariat will share at the next meeting. The minutes were approved.</p>											
<p><b>2.0 For Update</b></p> <p><b>2.1 From the ASC Action Tracker</b>          FM presented an overview of the actions that resulted from every ASC meeting, as tracked by the <a href="#">ASC action tracker</a>. Members were invited to share their comments.</p>  <table border="1"> <thead> <tr> <th>Status</th> <th>Count</th> </tr> </thead> <tbody> <tr> <td>Done</td> <td>153</td> </tr> <tr> <td>Superseded / Closed</td> <td>26</td> </tr> <tr> <td>Ongoing</td> <td>11</td> </tr> <tr> <td><b>Total</b></td> <td><b>190</b></td> </tr> </tbody> </table> <p><b>Discussion Points</b>          A member raised concerns about low retailer and E-NGO participation in RSPO discussions, noting ASC's E-NGO vacancy since Rainforest Alliance left (item 183). Another member shared this concern, mentioning that the NGO caucus will address it in their next meeting. Concerns were also raised about item 113, highlighting the need for synergy between HCV-HCS guidance and the CB checklist at the jurisdictional level. It was noted that the JAWG has yet to address FPIC implementation across multiple communities and liability in RaCP execution. Members suggested this be discussed directly with JAWG, possibly during RT.          Regarding item 187, a member emphasised the need for the CEO to address AB capacity and availability at the ISEAL Alliance, as RSPO cannot resolve this alone. With only one AB (ASI) overseeing all CBs, this poses significant risks. AG confirmed efforts to engage other ABs but cited accreditation challenges. This is why the AB Performance Appraisal is being developed (item 186) where the Secretariat will assess ASI and peer reviews will be part of the appraisal. Another member suggested learning from FSC and MSC, reinforcing the CEO's role in raising the issue with ISEAL.</p>	Status	Count	Done	153	Superseded / Closed	26	Ongoing	11	<b>Total</b>	<b>190</b>	<p>The Secretariat to raise the AB capacity issue to the CEO for discussion at the ISEAL Alliance - to be tabled at the Q1 2025 meeting. <i>(Note: to supersede action item 186)</i></p>
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Done	153										
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<p><b>4.0 For Decision</b></p> <p><b>4.1 Independent Review of the Implementation of RSPO Labour Auditing Guidance</b></p> <p><i>Note: Please refer to the full report, executive summary, and decision paper shared as part of the Q4 meeting pack.</i></p> <p>BD shared an abridged overview of the findings. Recommendations were categorised into broader measures and concrete recommendations. Broader measures include improving labour auditing skills of auditors, making desk review phase more efficient, improving safeguarding of workers, improving gender-sensitivity of audits, allowing auditors more time and flexibility for interviews, cracking down on audit deception, making RSPO audits more time efficient and effective, lengthening the duration of audits or making them more focused, and improving worker inclusion in audits. The challenges in labour auditing can't be eliminated by guidance only, no matter how good it is.</p> <p><u>The following points were made during the elaborate presentation:</u></p> <ul style="list-style-type: none"> <li>• Improving labour auditing skills of auditors should involve promoting better work-life balance for auditors.</li> <li>• Improving gender sensitivity of audits can be aided by pressuring CBs to include women auditors in audit teams.</li> <li>• Making desk review more efficient may involve avoiding duplication of effort in document preparation.</li> <li>• Improving safeguarding for workers and ensuring greater independence of auditors involves potentially encouraging off-site interviews, and discouraging accompaniment by company staff on arrival at the site.</li> </ul> <p>CR presented the <b>concrete recommendations</b> including to review, revise, and improve the content of the LAG based on the findings. Once the LAG itself has gone through that process, RSPO can then consider which elements to make mandatory as soon as possible, to make mandatory within a set period (phased or after further consultation), and which to remain voluntary. In parallel, the Secretariat should also attempt to clarify how the LAG fits in the ecosystem of RSPO documents, whether to keep the LAG as a labour-specific document or to move mandatory requirements to the certification systems document (CSD). Proforest recommends the latter. Further steps include collaborating with CBs to develop additional protocols and support for auditors to complement the LAG, as well as implementing broader initiatives to promote LAG adoption by CBs.</p> <p><b>Discussion points</b></p> <p>A member asked how the inclusion of certain elements in the CSD would culminate procedurally. Another suggested the ASC decide if the Secretariat should identify workstreams based on the report's recommendations, such as mandatory elements, actions on the existing LAG, and auditor capacity building. A member reminded that the ASC should decide whether to endorse the Proforest report in this meeting.</p> <p>A member asked for suggestions on auditors' work-life balance based on personal experience. A member suggested that the detailed nature of P&amp;C audits and a general shortage of female auditors could be contributing factors,</p>	<p>The Secretariat to publish the full LAG review study on the RSPO website. <i>(Note: Action completed. The study was</i></p>
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<p>recommending a review of various aspects of the audit process. Another member proposed reactivating the ASC subgroup to examine various workstreams, which a few members agreed to revisit later in the meeting.</p> <p>A member asked Proforest to suggest measures to prioritise in the workstreams. BD responded that the report includes concrete recommendations that can be addressed, though all require concerted effort to improve labour auditing. Another inquired whether the issue is gender or auditors' competence. BD replied that based on literature, women are more comfortable discussing sensitive matters such as sexual harassment, with other women.</p> <p>A member asked if uploading documents to save time for auditors is part of prisma development. MSA responded that a pre-audit requirement for uploading certain data, is proposed and will take effect with the new CSD, P&amp;C 2024, and the prisma module. Another asked about the avenue to discuss prisma development due to sensitive issues like self-declaration and data protection. MSA explained that a BoG subgroup oversees development with the Assurance Division and other process owners in the Secretariat, while legal advisors work on privacy and data policies.</p> <p>A member highlighted the tension between wanting privacy to prevent fear of reprisal and encouraging group interviews to reduce inhibition. Another raised concerns about off-site interviews, as workers are often asked to attend in their free time. BD agreed, stressing the need to consider overtime compensation.</p> <p>A member warned that auditors lack training to investigate deeply, making it difficult to crack down on audit deception. BD agreed, noting that experience improves detection skills. Another asked if the study addressed audit challenges for other commodities or just palm oil. BD responded that it covered several commodities. Another member mentioned that traveling in company vehicles helps auditors navigate plantations. A member noted that Proforest's recommendations apply not only to labour audits but also to all social audits, including those involving female workers, land rights, smallholders, and human rights.</p> <p>A member asked if the report will be shared with stakeholders as per the ToR. AG proposed publishing it on the RSPO website, which ASC agreed to. Another member suggested reactivating the ASC subgroup to discuss operationalising the study's recommendations, while a different member preferred to move quickly without a working group. A co-chair proposed pushing concrete recommendations quickly to meet the CSD revision deadline, while other elements are sorted into workstreams and presented at the next meeting. The study results will also be shared at the next SSC meeting. The ASC congratulated Proforest and accepted the report.</p>	<p><i>published on 26 Nov 2024: <a href="#">link</a></i></p> <p>The Secretariat to identify workstreams based on findings of the Independent Review of LAG and present it in the next meeting.</p> <p>The Secretariat to incorporate concrete recommendations from the Independent Review of LAG in the new CSD.</p> <p>The results of the Independent Review of LAG Implementation to be presented in the next SSC meeting. <i>(Note: Action completed. Proforest presented the results at the SSC meeting on 5 Dec 2024)</i></p>
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<p><b>3.0 For Discussion</b></p> <p><b>3.1 Certification Systems Revision - Key Update</b></p> <p><i>Note: Please refer to the pre-read shared as part of the Q4 meeting pack.</i></p> <p>JH started the presentation for this topic.</p> <p><u>Item 1: Updated Timeline</u></p> <p>The original timeline projected the Certification Systems Revision (CSR) endorsement for Nov 2024 and was presented to the SSC in Oct 2024. However, the SSC decided endorsement will follow the completion of Annex 12 (formerly Audit Checklist, now tentatively Compliance Checklist) by Q1 2025, shifting the endorsement to March 2025. The updated timeline shows that Annex 12 development will run from Nov 2024 to Jan 2025, after the P&amp;C 2024 endorsement. Feedback from CBs, AB, stakeholders, and the ASC will be integrated by February 2025. SSC endorsement is scheduled for March 2025, followed by publication and socialisation from April to May 2025.</p> <p>Recommendations from the Independent Review of LAG that would be considered for the CSR have not been tabled in yet, though the plan is not to change the timeline for it.</p> <p><u>Item 2: Compliance Checklist (Annex 12)</u></p> <p>Revision 1.0 proposed adding three columns to clarify requirements and compliance expectations for the UoC, provide additional guidance to help the UoC implement indicator requirements, and align UoC compliance requirements with audit expectations, as the Audit Checklist will become normative under the revised Certification Systems document. Annex 12 has been recommended by the BoG, with SSC's agreement, to be informative. Previously, the audit checklist was a standalone document developed two years after the standards. This time, it will be developed immediately after endorsement and attached to the CSD as informative.</p> <p><u>Item 3: Focused Audits</u></p> <p>Many audits review every indicator, with a bulk of time spent on desk reviews, limiting time for crucial methods like stakeholder interviews, posing an Assurance risk. The focused audits suggest that not all indicators need to be audited during each surveillance audit. However, all indicators must be audited during initial certification (IC) and recertification (RC). The mandatory list will include all 'Critical' indicators and selected 'non-critical' indicators to be audited every time, including all social indicators. Non-mandatory indicators must be audited at least once during a certification cycle. Indicators that received a Non-Conformance (NC) in the last audit must be audited in the following one. If a CB identifies risks in not auditing a particular indicator, it must be audited, even multiple times during a cycle if necessary. This proposal does not apply to Independent Smallholders (ISH), as all indicators are critical and must be audited.</p> <p>MSA took over to present item 4.</p> <p><u>Item 4: Uncertified Management Units</u></p> <p>Uncertified Management Units (UMUs) pose a risk to RSPO's reputation due to potential violations of labour laws and environmental damage. Currently, RSPO requires UMU to meet 4 key requirements (labour dispute resolution, legal compliance, land conflict resolution, and no HCV clearance), relying on the UoC</p>	
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to provide an assurance statement and evidence of the UMU's compliance with the requirements. However, this is risky because due to cost and logistical constraints, field inspections are often not carried out, limiting auditors' ability to detect non-compliance during audits. The Secretariat proposed a separate verification that is not part of surveillance or certification audits, to assess UMU's compliance with the four key requirements. This process includes clearer definitions of the requirements, mandatory stakeholder consultations & field inspections, and the potential application of remediation measures or sanctions.

**Discussion points**

A co-chair requested the updated timeline be shared via email once the GA is done. A member noted that naming Annex 12 as a Compliance Checklist implies an absolute requirement, conflicting with its intended informative nature. Another member agreed, suggesting the name be reconsidered.

A member raised the need to revise the New Planting Procedure (NPP), and whether some elements need to be integrated into the CSD. ZT mentioned that it isn't necessary as NPP is already mentioned as an indicator in the P&C. MSA added that the CSD outlines minimum qualifications for auditors conducting NPP audits, but the process itself is referred to only in the NPP guidance. The member asked if incorporating relevant elements from the newly accepted LAG study into the CSD would update the NPP. HS replied that if any elements from the LAG are moved to the CSD and are relevant to the NPP, the NPP would be revised accordingly during the 12-month transition period.

A member questioned who is responsible for identifying risks in focused audits, noting that CBs might exaggerate risks to justify higher charges or downplay them due to potential conflicts of interest. Another member inquired whether focused audits would be tailored to specific locations and companies. A member, also serving on the SSC, shared that this topic was recently discussed and emphasised that focused audits are essentially risk-based assessments. As noted in the SSC, RSPO needs to establish a robust system for risk-based approach that minimises the potential for criticism or abuse while positioning itself as best-in-class in auditing.

A member asked whether this should be decided by the SSC as part of the CSR process. MSA responded that the approach, proposed by ASI for RSPO's consideration, has been presented to both the ASC and SSC for further direction. It is now being applied to Annex 12 and ongoing discussions. Additionally, the Secretariat is conducting a larger risk-mapping exercise, with the identified risks guiding future audit recommendations for CBs.

A member suggested that the risk mapping should be presented to the ASC and SSC once available for further decision. HS responded that the Secretariat could create a plan, potentially supported by the ongoing risk mapping project within prisma. This module aims to create a heat map of risks based on various data sources and could contribute to a larger data-driven risk approach. A member inquired if AI would be used to reduce the workload and HS confirmed that this is being done via TraceMark where AI is one of the tools used for data handling. Multiple members expressed concerns that the risk-based approach could expose RSPO to criticism if not robust enough, with one suggesting that the

The Secretariat to share the updated timeline for CSD after GA21. *(Note: Action completed. Standards rollout timeline is attached to this email)*



<p>system should allow auditors to report non-compliances based on integrity if detected while on-site.</p> <p>A member asked if the UMU (item 4) proposal was discussed at the SSC. Another confirmed, noting concerns about its practicality, impact, and potential to upset growers, suggesting the Secretariat to take a risk-based approach. A member recounted GA18-2c (Enhancing the robustness of the RSPO Mass Balance model) and asked if it related to the UMU issue. MSA responded that it might not be. HS clarified that a multi-pronged approach is needed for the resolution, citing P&amp;C 2018 2.3.2 as a transparency-based outcome indicator. The Supply Chain Certification (SCC) revision, set to begin in Q1 2025, will consider various aspects, including participation in an ISEAL study on controlled mass balance approach that aims to differentiate MB volumes with geolocation data from those without. Some related requirements have also been included in the latest P&amp;C. The efforts hope to make data and traceability more available.</p> <p>A member asked what a grower would derive from this process, whether it will help with EUDR compliance, or discourage them from going for full certification. HS mentioned that full certification is a P&amp;C requirement with a time-bound plan to follow through. However, this is meant to strengthen the MB module and provide extra assurance before they are fully certified. This is more pertinent for the CSPKO market, which currently has supply constraints i.e. only 60% supply of CSPKO in the European market.</p> <p>MSA noted that verification of UMUs' compliance with the 4 key requirements through self-declaration by UoCs is inconsistent, as different CBs audit different UoCs. A parent company may have 3 or 4 CBs assigned to audit their many UoCs, often resulting in varying outcomes. MSA agreed that the proposal needs to be refined further. A co-chair raised that more clarity is needed to show how this works practically. Perhaps a separate procedure would add fairness for UoCs that are audited by different CBs with different outcomes. They added that the conversation of making the MB system more robust sits outside of this particular discussion.</p>	<p>The Secretariat to share a more detailed proposal regarding focused audits and uncertified management units for online consultation with the ASC in January 2025 (ensuring alignment with the CSD revision deadline).</p>
<p><b>5.0 Any Other Business</b></p> <p><b>5.1 Other Matters</b></p> <p><b>5.1.1 Vacancies in the ASC for Environmental NGO and Retailer Seats</b>  AN shared that Joseph Chauke from Woolworths Foods expressed interest in the vacant retailer seat, and no objections were raised. <i>(Update: The appointment was formalised on 19 November 2025)</i></p> <p><b>5.1.2 ASC Meetings in 2025</b>  Calendar invites for proposed dates for ASC meetings in 2025 will be sent, and must not clash with BoG or any other standing committee meetings. <i>(Update: Calendar invites for 2025 ASC meetings have been sent to all members.)</i></p> <p><b>5.1.3 ALDI Letter</b></p>	





<p>AG shared that a letter was sent by ALDI concerning allegations against Naturaceites in Latin America. A complaint was filed through RSPO's Grievance mechanism, leading to the termination of IBD (previous CB for Naturaceites), and the appointment of a new CB. Due to some issues including CB shortages in Latin America, Naturaceites was granted a time extension, raising concerns among retailers, particularly in Europe and Germany, where EUDR and the German Supply Chain Due Diligence Act are key. Despite ongoing monthly communication, ALDI remains dissatisfied with RSPO's responses, citing non-responses and unresolved issues like human rights violations and unannounced audits. ALDI requested independent audits, a topic previously discussed by the ASC and BoG. The Secretariat sought ASC's input on handling the letter.</p> <p>A co-chair noted that the issue will be raised at the next BoG meeting, stressing the importance of timely response to ALDI and other retailers. Delays in Latin America, particularly with visa processing for auditors, were highlighted. ALDI also raised concerns about land appropriation from indigenous people, a broader issue that requires BoG involvement, as it could impact RSPO membership retention.</p> <p>A member asked if RSPO is experiencing a surge in such allegations and whether it can rely on CBs or should consider building independent investigative capacity. Another member noted this issue had been raised previously but remains unresolved, citing two cases in Guatemala where RSPO struggled to find a suitable party for independent investigation. Concerns about budgeting and recruitment were also raised, with the Pool of Experts showing little progress. It was recommended that the Secretariat explore resourcing an independent team. A co-chair suggested escalating the matter to the BoG.</p> <p>Separately, a member highlighted discussions from the previous P&amp;C meeting in KL regarding Principle 4 (Respect community and human rights...), which concluded with the need for further deliberation on its auditability. LG, who attended follow-up meetings with the CEO and NGOs, shared a push to further involve CBs and ASI. <i>(Update: RSPO sent a response letter to ALDI on 2 Dec 2024)</i></p>	
<p><b>End of meeting</b> AN gave the closing remarks of the meeting. The meeting was adjourned at 8.48 PM, Bangkok time.</p>	