

**Assurance Standing Committee (ASC) – Complaints Panel (CP)  
Joint Meeting (via Zoom)  
Minutes of Meeting**

Zoom Link: Zoom Meeting (<https://zoom.us/j/92231783259>)  
Date and time: Friday, 15 April 2025, 4.00 pm – 6.09 pm (GMT+8)

**ASC Members' Attendance:**

Name	Organisation
Anita Neville (Co-chair)	Golden Agri-Resources (GAR)
Ruth Silva (Co-chair)	HCV Network
Olivier Tichit	Musim Mas Group

**CP Members Attendance:**

Name	Organisation / Company
Dato' Henry Barlow (Co-Chair)	RSPO Honorary Member
Lim Sian Choo (Co-Chair) ( <i>apologises for absence</i> )	Bumitama
Marieke Leegwater	Solidaridad

**RSPO Secretariat Attendance:**

Name	Position
Aryo Gustomo (AG)	Director, Assurance
Aloysius Suratin (AS)	Deputy Director, Biodiversity & Climate Change
Leena Ghosh	Head, Human Rights & Social Standards
Pravin Rajandran	Head, Grievance
Zaidee Tahir	Head, Integrity
Tri Budiono (TB)	Senior Manager, Global Imo Programme
Ramitra Ramarao	Manager, Grievance
Akmal Arif Razali (AR)	Manager, Climate Change
Carolus Rudy Pinem	Manager, Grievance (Indonesia)
Muhammad Reza Haryo	Manager, Grievance (Indonesia)

Maria Alejandra Montes	Manager, Grievance (Latam & Africa)
Freda Manan	Assistant Manager, Integrity
Lee See Lung	Assistant Manager, Grievance
Hazman Naim	Assistant Manager, Grievance
Fazriya Begam	Administrator, Grievance
Mutiara Firsty Nagisa	Administrative Assistant, Grievance

Description	Action Points
<p><b><u>1.0 Introduction</u></b></p> <p><b><u>1.1 Welcome Remarks</u></b>  Attendees exchanged pleasantries, and PR briefly shared the agenda. PR noted that a request to discuss Complaints integration in <i>prisma</i> was removed, as its implementation is scheduled for a later date and there were no relevant updates. A CP member requested that future agendas should include notes from the previous meeting to ensure continuity and coherence in discussions. PR agreed that the Secretariat will implement this moving forward.  An ASC member requested to raise a brief point under Any Other Business regarding SK No. 36/2025 pertaining to Indonesian legal entities conducting oil palm operations established in forest areas without forestry permits - to clarify jurisdiction concerning how this circular will be addressed.</p> <p><b><u>1.2 RSPO Antitrust Guidelines, Consensus-Based Decision-Making, Declaration of Conflict of Interest (Col)</u></b>  PR confirmed with the attendees an understanding of RSPO's Antitrust Guidelines and the need to declare any Col. No Col was raised.</p> <p><b><u>2.0 Impact of RSPO's Engagement with Intermediary Organisations (IMOs) on the CAP Implementation</u></b>  TB presented an impact summary of RSPO's IMO work relevant to CAP. The program's primary objectives include identifying respected local stakeholders, establishing communication channels with communities, raising awareness in local languages, and developing engagement toolkits. It also focuses on building the capacity of local NGOs and communities to increase their participation in RSPO's Grievance and Governance mechanisms. Globally, the initiative has invested more than three million USD in various outreach programs.  Across various countries, the program achieved a significant impact. In Indonesia, organisations like FORTASBI and ELSAM supported smallholder certification and rights advocacy. Communities such as those in Binasari village noted improved relationships with companies following program participation, highlighting the role of outreach in dispute resolution. In Malaysia, the establishment of the Conflict</p>	<p>The Secretariat to include key points/action items from the previous meeting as part of future meeting agendas.</p>

Prevention Platform (CPP) fostered trust and inclusivity, empowering marginalised communities and bridging systemic gaps.

In Liberia, community understanding of FPIC and RSPO Grievance procedures improved, with increased transparency in concession relations. However, despite filing a complaint against Golden Veroleum Liberia and findings against the company, implementation challenges remained due to fragile community relations. Nigeria saw gains in community empowerment, dispute resolution, and awareness, with increased collaboration on social and environmental fronts.

In Colombia, RSPO standards supported land and labour conflict resolution. Training and certification efforts enhanced community capacity and provided access to international markets, contributing to sustainable livelihoods. Meanwhile, Guatemala and Honduras focused on stakeholder engagement through training and the creation of Human and Labour Rights Observatories, improving the monitoring and advocacy.

Looking ahead to 2026-2030, the program aims to consolidate best practices into a unified platform, emphasise sustainability and dispute prevention, strengthen community resilience, and promote inclusive engagement mechanisms.

#### **Discussion points**

A CP member commended the IMO Community Outreach and Engagement Programme as valuable work, congratulating the team on its outcomes. They asked if the budget has been sufficiently allocated to continue. The member also shared about a presentation to the CP by researcher Ward Berenschot, an analysis of land conflict complaints in Indonesia and found that RSPO membership and the presence of international NGOs improved conflict resolution, doubling the chances of resolution. Findings are to be presented at SPOD Paris 2025. TB shared that the current IMO programme budget of \$3 million will be fully utilised by the end of this year. The team has been negotiating and proposing funding for the next five-year phase of the programme, hoping to secure a commitment from the RSPO Board of Governors, and has been anticipating work from other NGOs in the sector.

An ASC member emphasised the importance of gauging the impact of the IMO programme, as it relates to the complaints system, which remains one of the most sensitive areas. Acknowledging the value of the work and the modest budget of \$3 million over nine years, they stressed the need for more meaningful metrics beyond the number of organisations engaged and materials delivered. They suggested estimating the number of complaints avoided or improved due to engagement by IMOs, and called for clearer data to demonstrate the programme's effectiveness. As future funding discussions approach, they noted that evidence of tangible impact, especially in grievance resolution, will be key to gaining support among members. TB acknowledged that there is currently no quantitative data available on the number of complaints resolved before reaching the formal grievance process. An example was shared from the CPP in Sabah, developed with the Bio Community Initiative (BCI), where three cases involving indigenous communities and RSPO member companies were addressed in the past year. Similarly, in Indonesia, an early warning system has been used to mitigate conflict before escalation. While these initiatives have fostered trust and engagement between communities and companies, their impact has yet to be measured. TB recognised the need for more in-depth work to provide reliable and meaningful data.

A member acknowledged the difficulty of justifying budget allocations for prevention, noting the tendency to prioritise urgent issues over root cause interventions. They stressed that focusing on the causes of complaints and improving mediation and complaint quality is important. The member expressed interest in the Berenschot analysis and suggested it could be valuable for learning. They also asked whether the publicly available analysis had been considered in Assurance to inform certification body competencies and auditing guidance. PR agreed to re-circulate the Berenschot analysis for all members present at this meeting.

In the Zoom chatbox, members discussed the return on investment of prevention, the possibility of analysing the available data of IMO-project countries. They noted that a reduced number of complaints have been logged this year to date. An ASC member suggested that indicators of impact can be set up, and compared to a baseline before intervention, with measurements on IMO engagement (frequency, quality, result) correlating with its relevant conflict (occurrence, severity, duration and resolution).

The Secretariat to share the analysis done by Ward Berenschot to ASC-CP meeting attendees (*Action completed by PR on 26 April 2025*).

### 3.0 Addressing Challenges in RaCP and Ways Forward (Annex 9)

ZT provided an overview of the status of RaCP implementation, especially on the regular Annex 9 reporting. As of April 2025, a total of 113 Annex 8 documents (Remediation and Compensation Plan) have been endorsed, consolidating 484 RaCP cases into project-level reporting. Of these, 83 plans included a Final Conservation Liability (FCL), while 30 plans reported zero FCL.

However, only 62 Annex 9 reports have been submitted to the RSPO Secretariat, with 51 still outstanding, three of which are not yet due. Certification Bodies (CBs) are responsible for monitoring progress in certified units, while independent evaluators must be engaged to assess implementation in non-certified units at the end of year one and every five years thereafter. These evaluations are submitted directly to the RSPO BHCV Working Group.

#### Breakdown by Regions

	Annex 8 (endorsed with 0 FCL)	Annex 8 (endorsed with FCL)	Annex 8 endorsed (FCL, ha)	Annex 9 (submitted)	Annex 9 submitted (FCL, ha)	Annex 9 (not submitted)	Annex 9 not submitted (FCL, ha)
Indonesia	12	29	107,882.60	28	56,423.34	13	51,459.26
Malaysia	2	3	713.26	2	214.14	3	499.12
Colombia	7	12	1,631.41	14	495.01	5	1,136.40
Honduras	1	7	687.16	3	48.44	5	638.72
Others*	8	32	27,612.11	15	7,788.51	25	19,823.60
<b>Total</b>	<b>30</b>	<b>83</b>	<b>138,526.54</b>	<b>62</b>	<b>64,969.44</b>	<b>51</b>	<b>73,557.10</b>

\*The countries include Brazil, Cameroon, Congo, Côte d'Ivoire, Ecuador, Ghana, Guatemala, Mexico, Nigeria, Panama, Papua New Guinea, Peru, São Tomé and Príncipe, Sierra Leone, and Sri Lanka.

*Number of reports/hectares categorised by situation and country.*

There are significant challenges in implementing compensation projects, particularly in Indonesia and Latin America (LatAm). Key issues include invasion of compensation sites by local groups, and government repossession or reassignment, including for illegal mining. Many compensation sites are located far from the original concession,

making monitoring difficult, especially where CBs lack capacity, like LatAm. Further complications involve stakeholder withdrawal, company divestments, and gaps in the current RaCP for managing such transitions. CBs often verify only report submissions without field checks due to limited capacity or site distance.

To address these, the Secretariat proposed several revisions for RaCP version 2, including clearer monitoring roles for CBs and the Secretariat, stricter timelines for report submission, mechanisms for force majeure, site relocation, and sanctions for non-implementation, and formal procedures for divestment cases. The aim is to improve accountability and ensure effective delivery of compensation obligations.

### Discussion points

A CP member requested a clearer one-page summary of unresolved forest clearance compensation cases, showing the number of cases, hectares involved, and resolution status since 2005. They stressed the need for an overview before delving into RaCP stages and warned that inaction could attract criticism from external stakeholders.

A CP member suggested setting up a multi-stakeholder task force within the Secretariat to look into RaCP improvements. AR explained that the Compensation Taskforce 2 (link here: [CTF2](#)), overseen by the BHCV Working Group, is responsible for revising RaCP, given its relevance to HCV/HCS requirements. A workshop on 29 April 2025 will focus on two main objectives: streamlining RSPO processes (such as certification, membership, and new planting) and operational clarity of RaCP version 2, based on past implementation challenges. The aim is to finalise a revised, functional procedure for public consultation, aligning with the activation of the updated standards in November 2025. AS added that the upcoming workshop will be crucial for refining the RaCP to better address implementation changes and incorporate ways to measure impact on landscapes. He highlighted the need for a validation mechanism, clarifying the roles of the Secretariat and CBs, and suggested revisiting the current divestment provisions to ensure they are robust. All feedback from the meeting will be brought to CTF2 for further discussion. AG shared that consultations are ongoing for improving awareness and compliance with Annex 9 submissions, and further consultation with members and relevant working groups is planned.

An ASC member raised concerns about how data on unsubmitted Annex 9 reports is presented. They noted that including areas tied to former RSPO members may distort the overall picture and make the organisation appear less effective than it is. They suggested creating a separate category for cases that are unresolvable due to factors like membership resignation. ZT acknowledged this, explaining that historical data still includes liabilities from now-departed entities, and agreed to explore ways to clean up the data, though he cautioned that it may not significantly change the overall figures.

An ASC member reflected on the evolution of RaCP, noting that version 1 was built around early cases and developed flexibly by the BHCV Working Group as issues emerged. They supported the move to RaCP version 2 but cautioned against creating overly rigid procedures. Key principles to maintain include transparency and a risk-based monitoring approach to ensure efficient use of CB and member resources. Field checks should be guided by risk, not applied uniformly, particularly where project sites are far from concessions. A CP member requested that a 6-month update on RaCP progress be circulated to both the ASC and CP.

The Secretariat to provide a 6-month update on RaCP progress to the ASC and CP.

#### **4.0 Any Other Business**

##### **4.1 Response time for Special Audits concerning allegations in Complaints**

The Secretariat noted growing delays in responses from CBs to special audit requests related to complaints, particularly in Latin America. The slower response rate may be linked to limited CB presence in the region and possible capacity constraints. The concern was raised to highlight the need for improved responsiveness in handling complaints through special audits.

AG explained that the current 2020 Certification System lacks clear requirements for conducting special audits, contributing to delays. A revised version is underway, including requirements for special audits, and is now under consultation with the ASC and SSC. RSPO and ASI are working on multi-year efforts to attract more CBs and qualified auditors to strengthen audit capacity in LatAm.

##### **4.2 FPIC in Existing Plantations**

A CP member reflected on ongoing confusion around FPIC requirements for existing plantations, which remained unchanged in the recent P&C review. They noted that while some view the rules as unclear, others believe sufficient guidance already exists. The member welcomed an upcoming meeting, likely in September, aimed at clarifying the rules and determining whether additional guidance is needed.

LG clarified that during the multi-stakeholder consultation, Social NGOs and Growers disagreed on FPIC requirements for existing plantations, resulting in the decision to retain the 2018 P&C text. However, reviews have revealed weaknesses in indicator phrasing and the audit checklist, leading to inconsistent auditing. In response, the Secretariat is working with ASI and CBs to revise an audit checklist applicable across the P&C. Additionally, a workshop is planned for September-October 2025 (budget permitting), bringing together Growers, NGOs, CBs, and potentially Indigenous representatives to discuss implementation challenges related to Principle 4.

##### **4.3 Clarification on Jurisdiction and Audit Implications of Indonesian Forestry Circular SK 36/2025**

An ASC member raised the need for clarity on jurisdiction and guidance related to Indonesia's Ministry of Forestry circular SK 36/2025, which lists both certified and uncertified plantation companies. No formal communication has been received from the government regarding the implications of being listed. The member suggested that, in the absence of legal or regulatory action, CBs should be aware of the circular and conduct additional checks, but this should not automatically trigger a non-conformance. They requested confirmation on whether this falls under the Assurance Team's jurisdiction and whether guidance will be issued to CBs to prevent inconsistency in audits.

AG acknowledged receiving and reviewing the SK 36/2025 circular and noted that the regulation lacks clarity on next steps, outlining only that the listed companies may have permit overlaps with forest areas and that further actions will be taken by the government task force (Satuan Tugas Penertiban Kawasan Hutan). No specific legal consequence has been communicated thus far. The Secretariat has been monitoring developments and engaging with Indonesian grower members, including discussions



<p>with the IGC in the following week, to better understand potential impacts. Given the uncertainty and possible government actions against listed companies, AG emphasised the need to proceed cautiously before issuing any formal guidance to CBs.</p> <p>An ASC member raised concern that the upcoming IGC discussion may not clarify SK 36/2025, as neither the Secretariat nor the IGC have further insight unless affected parties have been contacted directly by the government. The member questioned who holds responsibility for interpreting the circular and stressed the Secretariat's role, as the standard setter, in guiding CBs. AG acknowledged the concern and agreed to escalate the matter for internal discussion, including with the CEO and the ASC. He also stressed the need to avoid interfering with ongoing government processes. A CP member requested to be updated on the outcomes of these discussions.</p> <p>An ASC member highlighted the urgency of providing interim guidance to CBs, as ongoing audits may involve companies listed in SK 36/2025 or approached by government authorities. They supported a practical approach for the upcoming IGC meeting and emphasised that CBs and members need clarity on RSPO's position, even if broader communication is not yet appropriate.</p>	<p>The Secretariat to provide an update on next steps related to SK 36/2025 at the Q2 2025 ASC meeting, and subsequently update the CP.</p>
<p><b>End of meeting</b> PR thanked members of both the ASC and CP for participating and the meeting adjourned at 6.09 pm.</p>	