

Assurance Standing Committee 23rd Meeting (virtual) Minutes of Meeting

Zoom link: Zoom Meeting (https://zoom.us/j/96427453445) Date and time: 28 May 2025 at 3.00 pm - 5.30 pm (GMT+8)

Members Attendance:

Growers			
Glowers			
Name	Organisation	Group Representation	
Anita Neville (Co-chair) (AN)	Golden Agri-Resources (GAR)	Indonesian Growers (IGC)	
Thien Jing Wen	IOI Group	Malaysian Growers (MPOA)	
Florent Robert	SIAT SA	Other Growers (RoW)	
Lawrence Quarshie	Golden Star Oil Palm Farmers Association (GSOPFA)	Smallholders Group	
NGOs			
Name	Organisation	Group Representation	
Ruth Silva (Co-chair) (RS)	HCV Network	E-NGO	
Ahmad Furqon	WWF Singapore	E-NGO	
Paul Wolvekamp	Both ENDS	S-NGO	
Angus MacInnes (absent with apology)	Forest Peoples Programme	S-NGO	
Marcus Colchester (alternate member for Angus MacInnes)	Forest Peoples Programme	S-NGO	
Supply Chain Sector / Downstream / Others			
Name	Organisation	Group Representation	
Lee Kuan-Chun (absent with apology)	P&G	CGM	
Joseph Chauke (absent with apology)	Woolworths (Proprietary) Limited	Retailers	
Olivier Tichit	Musim Mas Holdings	P&T	



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	Head, Human Rights & Social Standards
Jasmine Ho Abdullah (JHA)	Manager, Standard Design & Innovation
Maria Papadopoulou (MP)	Manager, Standard Design & Innovation (Supply Chain)
Freda Manan (FM)	Assistant Manager, Integrity
Haziq Ikram Rahmat	Executive, Integrity

Other attendance:

Name	Position
László Máthé (LM)	RSPO Program Manager, ASI
Paco Padilla	Deputy Operations Director, ASI

Description	Action Points
1.0 Introduction	
1.1 Welcome Remarks RS briefly gave welcome remarks, and ZT shared the agenda. 1.2 RSPO Antitrust Guidelines, Consensus-Based Decision-Making, Declaration of Conflict of Interest (Col) ZT reminded members of the RSPO Antitrust Guidelines, ASC objectives, and the need to declare any Conflict of Interest (Col). None were declared.	
1.3 Acceptance of MoM from the 28 August 2024 Meeting ZT invited comments on the Q1 ASC meeting minutes (26 February 2025). The minutes were approved without further comment.	



2.0 For Discussion

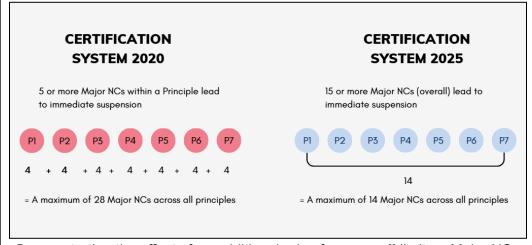
2.1 Latest Revision of the New RSPO Certification Systems Document (CSD)

HS clarified that the ASC and SSC will be continuously engaged during the CSD development until approval before being sent to the SSC for final endorsement. JHA presented on the changes to the CSD that require the ASC's consideration: Number of Major NCs for Immediate Suspension:

According to the 2020 CSD, if five or more major NCs within a Principle were found in an annual surveillance audit (ASA) or a recertification audit (RC), the certificate would be suspended immediately. The proposed 2025 version included an **additional** clause to enforce a limit of 15 NCs (across all principles) for the same immediate suspension.

The proposed additional clause:

6.16.8 Where five (5) or more major NCs are raised within a principle and/or fifteen (15) or more major NCs are raised overall during the ASA and RC, the CB shall immediately suspend the RSPO certificate for the UoC, effective from the date of the closing meeting. The suspension shall remain in effect as long as the major NCs have not been successfully closed.



Demonstrating the effect of an additional rule of an overall limit on Major NCs.

Exclusion Of Disputed Land From Certification Scope (6.2.8 & 6.2.9):

JHA explained that the intention of this discussion is not for a change to RSPO standards (i.e. in this case, P&C & RISS (RSPO Independent Smallholder Standard)) regarding FPIC, land ownership, and legal requirements, but to determine whether a Unit of Certification (UoC) can qualify to be audited to begin with, as to audit such land introduces varying risks.

If a UoC has a legal land dispute, they are excluded from the scope of certification. The Secretariat acknowledges that concerns regarding these issues, compounded by certain communities' lack of access to legal mechanisms, are legitimate, and as such, they are addressed in the RSPO standards.

The proposed clauses for the CSD:



"6.2.8 Where there is legal action concerning any land going for **initial certification** specifically related to the land ownership or land use rights, the land in question shall be **excluded from the scope of certification** until the legal action has been resolved.

"6.2.9 For UoCs already certified, where there is legal action against a UoC regarding land ownership or land use rights, the land in question may remain within the scope of certification subject to the fulfilment of the RSPO standards compliance requirements. The CB shall be kept informed of the ongoing legal action. "Guidance note: For the avoidance of doubt, legal action applicable to 6.2.8 and 6.2.9 must be a formal legal action that is recognised by the court of law and or authorities within the applicable jurisdiction."

Audit Duration:

JHA noted that the 2020 version of the CSD has no definition of a man-day, though the term was used in clause 5.2.3:

"As a general guideline, the duration of the site audit of a management unit consisting of **one mill and one estate** should be nine (9) man-days..."

This addition aimed to clarify the minimum audit duration for any given UoC. However, consultations point to how unclear the CSD is about exactly how long the duration should be in the more complex scenarios. The proposed definition of a man-day:

"A.4.2 The audit days indicated below are based on the assumption that each audit day consists of eight (8) hours. Audit days shall be calculated to the nearest full or half-day. A risk-based audit approach may impact the generic minimum audit duration in the table below, based on risk assessments conducted by the CB."

MSA explained the new guidelines for the audit duration:

The Secretariat has prepared a table, drafted into the CSD, to elaborate on expectations for a minimum audit duration.

Minimum Audit duration (Annex 4)			
Minimum audit days for the RSPO P&C audit		Minimum audit days for the RSPO ISH audit	
Description of Activities	Min. Audit Day(s)*	Description of Activities	Min. Audit Day(s)*
Pre-Audit (e.g. desk study, risk identification, stakeholder identification, preliminary data review, etc.)		Pre-Audit (e.g. desk study, risk identification, stakeholder identification, preliminary data review, etc.)	
Per UoC	1.5	Group Manager	1.0
Auditing P&C Requirements** (Own estates, Scheme Smallholders)		Auditing ICS Requirements	
Per Palm Oil Mill (POM)	3.5	<500 members	1.5
Per Estate (<10,000 Ha)	4.0	500 - 2000 members	2.0
Per Estate (>10,000 Ha)	5.0	>2000 members	3.0
Stakeholders Interview*** (e.g. workers, affected communities, vulnerable group, etc.)		Auditing Group Members	
<25 people	1.0	≤12 Smallholders	2
25 - 50 people	1.5	13 - 24 Smallholders	4
50 - 100 people	2.0	25 - 36 Smallholders	6
>100 people	2.5	37 - 48 Smallholders	8
		49 - 60 Smallholders	10
		61 - 72 Smallholders	12
		73 - 84 Smallholders	14
		85 - 96 Smallholders	16
		97 - 108 Smallholders	18

The number of audit days for Stakeholders Interview was incorporated from the Independent Review of the Labour Auditing Guidance.



109 - 120 Smallholders	20
121 - 132 Smallholders	22
133 - 144 Smallholders	24
145 - 156 Smallholders	26
157 - 168 Smallholders	28
169 - 180 Smallholders	30
180 - 192 Smallholders	32
193 -204 Smallholders	34
≥205 Smallholders	36
****	36 *
≥205 Smallholders Stakeholder Interviews** (e.g. workers, affected	36 *
≥205 Smallholders Stakeholder Interviews** (e.g. workers, affected groups, etc.)	36 * communities, vulnerab.
≥205 Smallholders Stakeholder Interviews** (e.g. workers, affected groups, etc.) <25 people	36 * communities, vulnerab.

Extended, as more days are prescribed to larger Independent Smallholders.

Discussion points

A member asked if there would be time for further ASC feedback, noting only a proofread draft had been shared and expressing concern about rushing endorsement. HS confirmed the draft is current, key points will be discussed, and there's no pressure to endorse yet. The new system would take effect six months after endorsement, with SSC submission earliest by June 26.

Members were split on whether to add the new clause of 15 total Major NCs is too punitive or too lenient. A member expressed support for the new clause, but to remove the old clause, citing the significant addition of indicators (especially to Principle 6 the P&C), which already tightened our CSD by proxy. Members raised concerns that permitting 15 major NCs is overly lenient when compared to other ISEAL (International Social and Environmental Accreditation and Labelling Alliance) systems. Another member asked how the number in the latter clause, 15 major NCs, was derived. MSA explained that the limit was based on audit data, where the average was 13 per assessment. The figure allows some margin above the average.

A member questioned what would justify suspension for major NCs and whether setting the threshold at 15 simply reinforces poor practice. They suggested revisiting the benchmark and noted that other systems, like FSC (Forest Stewardship Council), treat five or more total major issues as systemic, urging RSPO to align with ISEAL norms. HS noted the 15 NC limit is a 50% tightening (28 indicators to 14) from 2020 and reflects a compromise. ASI data shows only 1% of UoCs would be affected. While some feel it should be stricter, it is not a more lenient approach.

A member pointed out that the previous version was also too lenient and may have gone unnoticed. They reiterated concerns that serious issues spanning multiple principles could still result in certification, questioning whether RSPO is effectively permitting such violations. Another member, drawing on auditing experience, also felt that 15 major NCs is too high, as even the average of 13 seems excessive. They echoed concerns from other members and the Complaints Panel about serious issues in certified units. They requested the



Secretariat to revisit whether 15 is an appropriate threshold for immediate suspension.

A member questioned whether RSPO provides clear guidance to CBs on which NCs should be considered unacceptable. They warned that public perception could be damaged if units with many major NCs are still certified, stressing the need to distinguish and weigh the seriousness of issues. Another member asked for clarification on whether the same NC threshold applies to initial certification audits versus surveillance audits, noting the difference between granting certification and suspending an already certified unit. MSA clarified that in the new draft, land rights issues are addressed at the initial certification stage. Initial audits allow up to 12 months to close NCs, while surveillance audits allow three months. More than five major NCs under one Principle is considered a systemic failure.

A member posited the example of a CB or auditor that misses indicators on the initial audit of a UoC. If that CB were to be replaced by a more competent CB or auditor, the NCs would appear to have been found then, but have been there since the initial audit. Other members opined that this is not to be solved with the CSD's improvement, citing CB performance being handled via other channels, such as ASI (point made in Zoom chatbox) and other mechanisms.

HS suggested a quantitative threshold to determine what percentage of current UoCs should be affected by the change, and to prescribe the number of tolerable major NCs from that. A member requested some additional data to be summarised and brought to the ASC for consideration of the threshold. Major NCs vs % of affected UoCs. Another member suggested streamlining towards a high threshold and a low threshold. The member also noted for the Secretariat to consider whether scope extension is to be considered as "initial certification" or "recertification", as this would change the applicability of these clauses. No consensus was reached here for the number of major NCs for immediate suspension.

A member voiced concerns that legal status isn't a fair compliance measure for communities lacking legal remedies. The current approach also risks greenwashing, as companies can certify compliant areas while excluding disputed ones. Another member responded that accusations don't equal guilt. The system already excludes disputed land claims, which aren't always valid. Penalising companies based on unproven claims may unfairly impact growers. A member reflected on the ongoing debate on partial certification. Serious reputational issues should impact certification, but the topic likely needs further

reputational issues should impact certification, but the topic likely needs further discussion. AG stated that legally disputed areas aren't excluded from oversight but still need a time-bound plan to resolve. Certification can continue with strict monitoring and plan implementation, ensuring a managed process, not greenwashing. MSA noted that Indicator 6.2.8 is for initial certification. CBs must evaluate the unit's internal grievance mechanism, including how land disputes not yet in court are handled. These disputes are assessed via documentation, follow-up, and negotiation progress, and can remain in scope. Another member noted that participation by growers in RSPO certification has stagnated. The system must be accessible, enabling companies to join and improve within the



system. Land acquisition issues should be addressed as NCs in subsequent surveillance audits.

A member pointed out that in one case (6.2.8), RSPO is choosing not to apply our voluntary standards because we're prioritising the law, while in the other (6.2.9), we do apply them. They urged RSPO to be more consistent, whether a land dispute arises before or after certification, our standards should apply. No consensus was reached here regarding the exclusion of disputed land from certification scope.

A member said that the audit duration table is overly prescriptive. Audit man-days should be risk-adjusted, not uniformly increased, as current sampling and stakeholder interviews already account for risk. A blanket increase disproportionately impacts larger units. Another member noted the lack of a risk-based auditing standard, making it difficult to integrate risk levels into audit duration or sampling.

A member recalled that more than 12 years ago, a consensus formed in RSPO that CB auditors should have a minimum number of days; otherwise, they face a mission impossible due to unforeseen issues. They urged RSPO to be more encouraging for audit days to be mostly spent in the field conducting interviews, rather than desk work.

A member asked the Secretariat: Are worker/community interviews part of the standard audit or separate, requiring extra days? How does RSPO factor this into overall audit duration? MSA highlighted the 1.5-day pre-audit's role in identifying stakeholders for interviews (e.g., vulnerable workers, affected communities), enabling time allocation. This aligns with labour auditing best practices, suggesting more days for broader stakeholder engagement beyond current processes, with a 20-minute-per-interview guideline.

A member offered to circle back with a counterproposal for the audit duration. A member inquired about defining a minimum number of auditors for consistent quality checks, noting that some CBs send three or four while others send fewer, emphasising the need for clarity. No consensus was reached for any of the three proposed clauses. The ASC agreed to continue with online consultation.

The Secretariat to follow up on the ASC's decisions/ recommendations for three the proposed clauses in the new CSD. (Note: Please refer JHA's to latest email dated 23 June 2025. with the Subject: Follow up on the Consultation the Certification

Systems

Document)

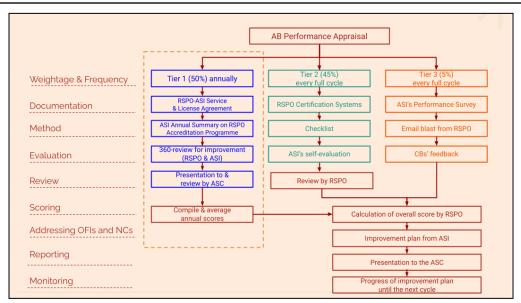
3.0 For Update

3.1.1 Accreditation Body Performance Appraisal: Pilot of Tier 1

Please refer to the report "3.1 RSPO AB Appraisal Tier 1 Pilot 2025," sent to members in the meeting pack on 21 May 2025.

FM presented the results of the pilot appraisal. ASI were excluded from this portion of the meeting. The pilot appraisal has completed its first tier 1 assessment, due annually as part of the larger AB Performance Appraisal.





The pilot only covers what's within the dashed line box.

Criteria	Max Points	Score
1. Feedback from Certification Bodies	20	11
2. Assessment Findings & Follow-Up Actions	25	11
3. Assessment Time Breakdown	15	10
4. Overview of ASI Assessors	10	1
5. RSPO-Relevant Issues	15	13
6. CABs and Auditor Overview	15	13
Total	100	59

Performance by Criteria: solely based on ASI's 2024 Annual Summary Report for RSPO.

Based on the performance evaluation, the Secretariat will conduct a 360-degree review with ASI on both parties' obligations under the service agreement. Members did not comment on the evaluation or recommendations.

3.1.2 ASI Quarterly Updates on RSPO Accreditation Programme

Please refer to the email for the slides presented by ASI, which were not received in time for inclusion in the meeting pack.

ASI representatives were brought back in for their quarterly update.

RSPO currently works with 24 CBs: 1 for P&C only, 14 for SCC, and 9 for both. CB coverage is sufficient but remains limited in Latin America (LatAm) and West Africa, as auditor availability remains a challenge for some CBs.

The Secretariat to present the full result of the Tier 1 pilot of AB Performance Appraisal at the ASC Q3 meeting.



Decisions	CABs	Total
Re-accreditation	Control Union Netherlands	1
Sanctions	Situation leading to sanction	Total
Formal warning	8) Failure to implement effective corrective actions, thereby not allowing ASI to close a major NC within the specified deadlines	2
	7) Failure to submit adequate responses within the specified deadlines.	2
Intensification of surveillance	8) Failure to implement effective actions, thereby not allowing ASI to close a major NC within the specified deadlines (ref. ASI-PRO-20-106).	1
	7) Failure to submit RCA, Correction and planned Corrective Actions for NCs within the specified deadlines (ref. ASI-PRO-20-106).	1
	Grand total	6

Accreditation decisions in 2025, year to date, are: 1 re-accreditation for Control Union Netherlands, several warnings or increased surveillance issued to CBs due to unresolved NCs. No suspensions, terminations or withdrawals. LM clarified that these decisions were made on 4 CBs in total, not 6.

The 2025 assessment plan included 93 scheduled audits, a 20% increase from the previous year. This is due to more certificates and increased surveillance of CBs. A key change is the prioritisation of compliance assessments (in the form of CFUs, Compliance Follow-Ups) over witness assessments, allowing ASI greater control to examine CB performance and risks. Head office assessments will focus on evaluating impartiality management within CBs.

ASI's 2025 RSPO P&C assessments have and will prioritise labour, health, safety, and housing. In SCC assessments, the focus is on refineries, multi-model certificates, and group certificates. Geographic surveillance is increased in LatAm and West Africa, with more assessments planned there. CBs are required to address CFUs in 3 months starting on 14 July 2025 (before this, 12 months).

NCs in P&C and SCC assessments stem from unaddressed previous audit NCs, inadequate social/environmental plan evaluation, and compliance follow-ups. Thematic issues include labuor (grievances, wages, hours, contractors, housing, social impacts). Head office assessment NCs relate to auditor competence (qualifications, registration, monitoring) and reporting delays due to complex RSPO requirements. Supply chain NCs are scattered, isolated lapses across wider requirements, unlike the concentrated, systemic failures seen in P&C assessments.

The expected decline in NCs at the end of the five-year RSPO cycle can be attributed to improved familiarity with standards by CBs, certificate holders, and ASI, and clearer RSPO guidance. RSPO's average NCs per assessment now align with other programs, and NCs are less systematic, showing greater system stability compared to 2015.



ASI receives few RSPO complaints, unlike FSC. One complaint is currently open against a CB regarding auditor impartiality. Last year, ASI handled two RSPO complaints, one against a CB and one against ASI.

ASI is simplifying its NC closure process to a three-month default timeline for CBs. Discussions are underway with the Secretariat regarding potential unannounced assessments for RSPO.

ASI implemented a safeguard protocol due to increasing certificate numbers in high-risk countries. This protocol addresses assurance challenges and ensures safety during stakeholder consultations for CB auditors and ASI assessors.

ASI is now focused on implementing its five-year work plan, strengthening assurance through the RSPO evaluation framework. They collaborate with RSPO on P&C 2024 rollout, aligning risk management, and reviewing RSPO SCC documents.

Discussion points

A member noted the absence of growers from certain regions in this meeting and the limited presence of CBs in Latin America. LM explained that a gap persists between Indonesia/Malaysia and other grower regions like LatAm, where only two CBs are active for P&C certification. At least one or two more are needed for certificate holders and RSPO safety. Reluctance exists due to regional certification challenges, but optimism surrounds a strong lead in Peru potentially attracting a new CB. A healthy pipeline of interested CBs exists. RSPO and ASI are also working to increase the pool of qualified auditors.

A member recalled that the low interest of CB auditors in piloting the voluntary RSPO Labour Auditing Guidance is concerning, especially given past underperformance in the social domain. LM clarified that the unenforceability of the guidance led to 2023-2024 OFIs for CBs. ASI backs a shift to risk-based auditing and suggested balancing grower concerns with deeper scrutiny of indicators through high-risk sampling or site focus.

3.2 NPP 2025 Revision Process and Timeline

In respect of time-keeping this discussion was skipped. AN conveyed that the Secretariat will call for a separate NPP session in June. A member requested a different date to avoid clashing with an FSC meeting.

3.3 Supply Chain Certification Standard Review

MP presented an update on the SCC standard review. RSPO initiated a five-year review of the 2020 Supply Chain Certification Standard in February 2025 due to ISEAL requirements and global priorities. The SSC approved an 18-month timeline, with public consultations in February 2025 and January–February 2026. Task force meetings scheduled are from May-December 2025. Final approval is targeted for July 2026, with BoG endorsement in September. The 16-member task force, with 10 observers, has open NGO and investor seats. The initial public consultation garnered 419 responses from 57 countries, mostly from RSPO ordinary members.

The initial public consultation survey garnered 419 responses from 57 countries, with 65% from ordinary members, 24% from associates, and 9% from affiliates. Survey results showed respondents want clearer, more flexible supply chain

The Secretariat to conduct an online consultation on the NPP2025 draft with the ASC.

(Note: Since more time is needed for internal consultations and scheduling has been challenging due to the summer break, 2 new timing will be proposed for late July or early August.)



certification, though mass balance rules divided opinions. Top topics for the revised standard included environmental (29%), legal (25%), and strengthening mass balance (24%) & traceability (23%) beyond the refinery.

The supply chain review task force held its kickoff on 29 April, during which members voted on seat appointments where interest exceeded availability. A first physical meeting took place in Paris on 22–23 May after SPOD (Sustainable Palm Oil Dialogue 2025). Upcoming meetings are planned for late June or early July, depending on members' availability.

4.0 Any Other Business

4.1 Comments/Feedback on the Assurance-Related Updates and the ASC Action Tracker

In respect of time-keeping this discussion was skipped.

4.2 BHCVWG Terms of Reference (ToR) Revision to Clarify Reporting Lines to ASC and SSC

In respect of time-keeping this discussion was skipped.

4.3 Indonesian Forestry Circular SK 36/2025 - Process and Expected Outcomes

AG conveyed that RSPO is monitoring the circular which impacts plantation companies. RSPO has appointed a legal counsel and will consult with Indonesian growers, CBs, and stakeholders to inform its position and guidance, aiming to report to the ASC in Q3.

In the Zoom chatbox, a member urged the Secretariat to consider taking immediate steps by issuing interim guidance to CBs on how to manage audits involving listed entities. It should also publicly disclose which RSPO-certified entities are affected and explain the actions being taken to assess and address their compliance. In addition, RSPO is encouraged to establish a participatory framework that includes affected communities and civil society organisations (CSOs) in relevant decision-making processes. Finally, to uphold its P&C, RSPO must take firm and visible action against non-compliant entities, as inaction may be interpreted as tacit approval.

The Secretariat to report on the outcomes of actions taken in relation to the Indonesian Forestry Circular SK 36/2025 at the ASC Q3 meeting.

4.4 ASC Q4 Meeting: Proposed timing

RT2025 will be on 3 to 5 Nov 2025 at Shangri-La Kuala Lumpur:

- Proposed date: Sunday, 2 Nov 2025
- Proposed time: 9:30 AM to 12:30 PM
- Location: same venue as RT2025, meeting room to be advised later

End of meeting

AN gave the closing remarks and the meeting was adjourned at 5:30 PM.