Appendix 1: Current status of work undertaken by the ATF and recommendations for taking it forward

No. and source ¹	Task	Current status of the work and any other observations Green – task completed, yellow – ongoing work needed and red – stalled	Recommendations	
1	Develop clear, mandatory guidelines on the minimum acceptable quality of HCV assessments:			
1.1	To provide a summary report on the HCVRN-ALS and progress on quality control of HCV assessment reports.	An ASL report covering 2014-2016 was produced in June 2017. There were no further reports to the ATF. Currently individual reports on assessments are on the HCVRN website and the ALS report to the RSPO Secretariat via calls every 2 weeks. Although there is now a 2-year agreed funding programme the HCVRN feel that there is still a lack of strategic direction from the RSPO about how the ALS is performing, what the future demands on the HCVRN will be and anticipation of likely issues and risks.	HCVRN should continue to report to the RSPO Secretariat. The ASC should have a strategic overview of the reports and the relationship. The ASC should consider whether these reports are made public.	
1.2	Prepare guidelines for HCV licensed assessors	A 'Complementary HCV Checklist for RSPO P&C 5.2 and 7.3' was produced by HCVRN for the RSPO in April 2018 to help CBs to verify compliance with RSPO P&C 5.2 and 7.3 during audits. It was understood to be valid until the next version of the RSPO P&C came into effect.	See 1.3.1	
1.3	HCVRN to develop and publish minimum requirements for assessors	There seems to be some confusion between the HCVRN and the RSPO about the status of its update of the HCV Checklist to take account of the revised P&C 2018. The HCVRN report that they have done it but the RSPO Secretariat believe it is still pending. Since the HCV Checklist has not yet been updated it does not make sense to publish it	There should be an on-going mechanism to review and update the checklist with the RSPO Secretariat and the HCVRN. The RSPO should consider whether and how the BHCVWG could contribute to that work. Finalise the updating of the HCV Checklist to the P&C 2018 and publish on the HCVRN website	
1.3	Training of assessors on the checklist	There is a list of trainings that were carried out in 2017-2018. But there was no programme to follow up on these or to review their effectiveness.	There should be an on-going programme of training and a mechanism to review ALS progress on training. Management of the training carried out by ALS should be by the RSPO Secretariat but there should also be oversight by the ASC.	
1.4	 Train CBs and Growers on HCV requirements: Compile a list of HCV trainings already carried out. Develop training schedule for growers and CBs and make the schedule publicly available. Develop Sustainability College modules for HCV 	 There is a list of trainings carried out in 2017-18, but this has not been updated since. A Training Department was established in the RSPO and staffed in 2019. However, the Training Manager subsequently left. Under the new Secretariat structure training will come under the Membership Team. A comprehensive Training Calendar will be developed. There is an online HCV course on the RSPO Sustainability College site. The ToR of the ATF called for developing a 'Proactive approach by RSPO to skills development (Identify options such as bursary funds, course endorsement, partnerships and collaborations etc.)' - this still needs to be undertaken. 	The RSPO needs to develop an on-going training programme covering all elements of the Assurance process based on a thorough needs assessment conducted with the HCVRN. This needs to not only cover initial training but follow up monitoring and support to members, assessors and auditors to implement change. Training should be planned and implemented by the RSPO Secretariat but the ASC should retain oversight of the programme to ensure it is effective and responsive the changes.	
PR01	Strengthen institutional links between the RSPO and the HCVRN	Tiur Rumondang (RSPO Indonesia Director) is the point of contact with the HCVRN Steering Group. A range of RSPO members also participate in the group – Olam, GAR and FPP	ASC could consider if it has a role in the HCVRN steering group?	

¹ Numbered tasks were included in public Progress Reports of the ATF, those labelled PR01 were reported on within the first Progress Report (although never formally taken up as tasks), those labelled ToR were included in the ATF's Terms of Reference but have not been reported on and those labelled WWW1 have been drawn from the first Who Watches the Watchmen report.

No. and source	Task	Current status of the work and any other observations Green – task completed, yellow – ongoing work needed and red – stalled	Recommendations
2	Develop clear, manda	tory guidelines on assessments of FPIC in the New Planting Procedure:	
2.1	Develop clear, mandatory minimum guideline on assessment of FPIC in NPP process and make them available on the RSPO website	English language guidance on FPIC in the NPP was developed in Feb 2018 The NPP FPIC assessment guide is available on the RSPO website There should be an ongoing process of ensuring alignment with the P&Cs	RSPO Secretariat to keep the guidance under review and revise as needed. In particular the RSPO should keep non- compliances related to FPIC under review. The ASC should keep a watching brief on this issue
2.2	Translate FPIC documents into Bahasa Indonesia, Thai, French & Spanish and publish on the RSPO website	The NPP FPIC guide has now been translated into Bahasa, Thai, French and Spanish and are available on the RSPO website.	None
2.3	Develop modules on NPP FPIC to be made available to growers, communities and CBs	FPP developed a training module for CBs at a workshop in Bandung in May 2017. It is aimed at CBs but is also considered useful for growers. The ToR of the ATF also specified that training should also be appropriate for communities – but it is unclear whether this module is sufficient. Trainings were conducted in 2019 with community-based organisations in Bogota, Liberia and Medan with the intention that the knowledge is communicated, by them, to the communities impacted by palm oil plantations. See: <u>https://docs.google.com/presentation/d/1gcDUFXDgw7s9OP7LiGcKJnOE9FSRY_4WesQhAm7MMSA/edit?usp=sharing</u>	The training module should be kept under review. This training needs to be part of a comprehensive training programme that not only covers initial training but follow up monitoring and support to members, assessors, auditors and communities to implement change. Training should be planned and implemented by the RSPO Secretariat but the ASC should retain oversight of the programme to ensure it is effective and responsive the changes.
2.4	Develop training schedule and conduct training.	NPP-FPIC training was carried out in Port Dickson in March 2018. The course included some Indonesian members. There have been a few NPP training courses conducted since then.	There should be on-going training

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3	Develop and institute a transparent and robust system for monitoring the quality of assessments:				
3.1.1	Develop a Social Auditing Protocol (with minimum requirements)	An 'RSPO P&C Social Auditing Protocol' was developed by ASI in December 2018.	Should be on-going development particularly to update them for the P&C 2018 revision. The ASC should keep a watching brief on this issue		
3.1.2	Conduct training for auditors on social auditing	CB trainings had been carried out in 2017-18 in both Indonesia and Malaysia and continue regularly now.	The RSPO needs to develop an on-going training programme covering all elements of the Assurance process based on a thorough needs assessment conducted with ASI.		
3.1.3	Conduct training for growers on social auditing	Training of growers has been done through a series of roadshows and 'clinics' during RSPO participation in grower conferences.	This needs to not only cover initial training but follow up monitoring and support to members, assessors and auditors to		
3.1.4	Conduct training for workers in Indonesia on social issues	A range of trainings for workers have been conducted in Indonesia between 2017 and 2019.	implement change. Training should be planned and implemented by the RSPO Secretariat but the ASC should retain oversight of the		
3.1.5	Conduct training for workers in RoW on social issues	Unclear what has been done to date other than on-going awareness raising under the Community Outreach Programme.	programme to ensure it is effective and responsive the changes.		
3.2.1	Develop a training module for partial certification	Module developed by Aidenvironment for CBs and growers in Aug 2017	Should be on-going development particularly to update them for the P&C 2018 revision. The ASC should keep a watching brief on this issue		
3.2.2	Conduct training for auditors on partial certification	CB trainings had been carried out in 2017-18 in both Indonesia and Malaysia and continue regularly now. There should be on-going training	There should be on-going training as part if a strategic training programme with oversight by the ASC.		
3.2.3	Conduct training for growers on partial certification	Training of growers has been done through a series of roadshows and 'clinics' during RSPO participation in grower conferences.			
3.2.4	Revise certification system documents to take account of partial certification	The Supply Chain Certification Systems Documents have been updated. P&C Certification Systems documentation is currently under consultation and expected to be finalised by mid-2020.	Should be on-going review and revision if needed by the RSPO Secretariat.		
3.3.1	Develop a training module for SEIA and NPP components	Module for CBs - developed by Aidenvironment in Dec 2017 It should be kept under review and updated	Should be on-going development particularly to update for the P&C 2018 revision		
3.3.2	Conduct training for auditors on SEIA and NPP	CB trainings had been carried out in 2017-18 in both Indonesia and Malaysia and continue regularly now. There should be on-going training	There should be on-going training as part if a strategic training programme with oversight by the ASC.		
3.3.3	Conduct training for growers on SEIA and NPP	Training of growers has been done through a series of roadshows and 'clinics' during RSPO participation in grower conferences.			
3.3.4	Develop a registry of SEIA assessors	SEIA requirements are set at a national level so it would be difficult for the RSPO to set its own requirements which may be why this has not been carried out. However, growers are asking for guidance and advise from the RSPO on who should undertake SEIAs for them.	ASC should take a decision on how best to improve the standard of SEIAs conducted, whether that is by developing a registry of assessors, developing minimum requirements or reviewing and co-recognising national systems.		

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3.4.1	Conduct a study on the remuneration of CBs	Consultant's report was written in April 2017. It covered a range of issues including remuneration and concluded that: Criticisms that there is an inherent conflict of interest between the function of CBs and their clients, the plantations, are, for the most part, unsubstantiated and that in conclusion, there is little evidence that CBs are colluding with clients to cover up violations of the RSPO standard.	ASC should keep the issue of possible fraud and collusion under review and explore how best to track if it is occurring.
3.4.2	Review of recommendations of the report for implementation (ATF to decide)	Other more general conclusions drawn from the consultant's report have been specifically acted upon including: - a need more consistent interpretation of the standards – <i>the RSPO Interpretation Forum has been set up on line to provide such information</i> - a need pre-audit 'introductory' training of units that are trying to get certified – <i>has been provided by an 'on-boarding programme' being developed for new members;</i> - the RSPO should quantify and communicate the benefits of P&C to encourage more growers to join – <i>is part of the work of the Outcomes & Evaluation Unit;</i> - more training of CBs – <i>is on-going;</i> - make website more accessible – <i>the website has been revised;</i> - ASI should review their relationships with the CBs to cultivate a more constructive relationship – <i>is on-going work by ASI;</i> . - ASI should review their fee structures to account for exchange rate fluctuations and to examine ways to bring them in line with other certification schemes – <i>has been completed in 2019 by ASI.</i> One recommendation that has not yet been actioned is exploring how to increase the NGO role in audits. This could have benefits both in terms of improving audit quality as well as building better trust and understanding between NGOs and growers and CBs.	ASC to keep the recommendations under review ASC to explore the potential for greater NGO involvement in audits.
3.5	RSPO to arrange for capacity building (outreach programme) for growers on assurance issues.	 There is ongoing training of growers in various formats. A range of critical issues was identified in the ATF ToR including: The quality of P&C implementation within companies; Internal responsibility for in-house audit skills and performance gap analysis; Performance reporting by growers to identify when additional requirements are evoked during audits, assessments or day-to-day operations; Company dispute process with CBs. 	The RSPO needs to develop an on-going training programme covering all elements of the Assurance process based on a thorough needs assessment conducted with the ASI. This needs to not only cover initial training but follow up monitoring and support to members, assessors and auditors to implement change. Training should be planned and implemented by the RSPO Secretariat but the ASC should retain oversight of the programme to ensure it is effective and responsive the changes.
3.6.1	Decide on the platform for publishing peat, NPP and HCV maps	The RSPO GIS Unit has developed the GeoRSPO platform in 2017 to hold relevant maps and this has been set up.	None
3.6.2	Make peat, NPP and HCV maps available and provided referenced sources for the maps	The GeoRSPO platform holds RSPO member concessions and mills, Protected Areas, HCV probability and wetlands maps alongside a range of land use maps. It does not yet have the NPP, HCV or peat maps as specified in the ATF ToR. The Peat Working Group has agreed with growers that their peat maps will be provided to the RSPO for monitoring and analysis but not made public. Global Forest Watch Pro users do have access to NPP and HCV maps.	The ASC should reach a decision about whether it wants to see peat maps published. There are sensitivities about publishing HCV maps due to possible wildlife crime – however the ASC should aim to publish NPP maps at least to ensure that transparency is achieved.

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3.7.1	Preparation of assurance guidance for the Jurisdictional Approach & RSPO NEXT	Developing guidance and assurance systems for new developments in the RSPO standards (specifically RSPO NEXT and the Jurisdictional Approach) depends on the progress of these systems through the RSPO decision making process.	RSPO Secretariat will need to develop systems, guidance, training and capacity building for both RSPO NEXT and the Jurisdictional Approach once they are finalised.	
		A decision on RSPO NEXT is awaiting the Board and the Jurisdictional Approach is subject to a current public consultation.	ASC to keep an overview of progress.	
PR01	Ensure stakeholder consultation by engaging Reference Panel members to assist with minimum guidelines	The Reference Panel in the ATF was designed to engage experts and external parties in the process. Whilst a good idea it was not well managed which lead to frustration and a level of disillusion with the RSPO.	ASC should put effort into giving external and expert stakeholders a more central role within the ASC. It is valuable to both parties to have real participation in the process.	
	for stakeholder consultation.		The ASC is proposing to set up an Assurance Forum with which it plans to engage on relevant issues. The Forum will not attend each ASC meeting.	ASC may need to keep under review the overall coherence of the range of approaches the RSPO requires for consultation and engagement.
		Specific proposals around how to strengthen consultation in the assurance process were also made. There is some evidence that the following issues were addressed to some degree by the ATF: - To develop guidelines for stakeholder consultation during P&C audits – it has been assumed	FPIC is designed primarily to engage those stakeholders directly affected by a development.	
		that the improved guidance on FPIC has dealt with this issue – however issues of consultation beyond with those stakeholders directly impacted by the development may still need strengthening? - Developing mechanisms for RSPO stakeholders to access Audit Summary Reports?	Other interests, such as civil society social and environmental organisations, may have a greater capacity to engage but the RSPO needs to ensure that the opportunities to do so are available to them.	
		- Reviewing of the mechanisms for on-going stakeholder consultation, social engagement and involvement on site – both during audits and for monitoring of grower performance. Again it may be that approaches need to go beyond the FPIC process?	Issues such as availability of relevant reports and maps as well as opportunities for stakeholders to participate in audits and assessments should be explored.	

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4	Monitor the quality and performance of Auditors and pursue suspensions or sanctions against underperforming or persistent offenders:			
4.1	Publish a summary of the ASI compliance report by end of December 2016 on ASI and RSPO websites	As part of the Integrity Project between ASI and RSPO started in 2016 ASI provided reports to the ATF in March 2017and Sept 2018. The 2017 report presented trends in ASI findings related to CB performance. The 2017 report is publicly available on the ASI website. ASI also produced a report for the RSPO in November 2017 analysing the non- conformities against the P&Cs encountered by CBs. This is also available on the ASI website.	There should be an on-going mechanism to review ASI (and ALS) reports and progress and sharing that with all relevant RSPO teams and groups. While the primary relationship should be with the RSPO Secretariat the ASC should retain a strategic oversight of how the relationship is being managed and what it is expected to deliver. Part of the review should look at what data ASI is asked to provide and ensuring that it is being used effectively by the RSPO. The ASC should also consider how much of the data are made	
		These reports contain useful management data for the RSPO – <i>but ASI are not confident that it was always used in that way.</i> Currently ASI is providing quarterly reports to the Assurance Integrity Unit of the RSPO Secretariat. These are circulated to the ASC and the Complaints Panel. <i>The question of whether these data are used effectively by the RSPO remains.</i>	The ASC should also consider how much of the data are made public to increase transparency and understanding of the assurance process. The ASC could consider reviewing whether recommendations from earlier reports have been acted on.	
4.2	Monitor the quality and performance of Auditors and pursue suspensions or sanctions against underperforming or persistent offenders	ASI implements its own independent accreditation service for the RSPO. The ASI website lists accredited CBs. Oversight of this independent service is provided to the RSPO through its quarterly reporting. There is a proposal from ASI to develop a CB 'scorecard' to signal the quality of accredited CBs (see 4.6) – but it seems likely that this for the time being would only be available for RSPO use. Growers have made a request for better information to be made available to them about the 'quality' of CBs.	ASC should retain strategic oversight of the relationship with ASI. ASC should keep the option to make a CB scorecard public under review.	
4.3	Provide capacity building to CB/Auditor by providing training for lead auditors and team members	CB training is ongoing through quarterly workshops. There is no evidence of specific follow up monitoring, socialisation or capacity building happening. The ATF ToR identified a number of issues to do with CB team selection and communication with growers about what is needed for high quality audits to happen. It is unclear whether ATF developed guidance on these issues and whether current trainings cover them.	There should be on-going training and capacity building as part if a strategic programme with oversight by the ASC.	
4.4	Establish a system to keep track of certificate status (which certificates are suspended/withdrawn/terminated) and the non-compliance(s) reported in the audit report	The status of RSPO certificates can be found on the RSPO website – by searching for certificate holders. This has fulfilled the ToR of the ATF. However it is not always clear why a certificate has been suspended which would give greater value to the information	ASC should review the level of public availability given to certificate status and suspensions. An integrated systems that would connect certificates suspended to the underlying maps, audit reports, complaints etc would make it much easier for stakeholders to get a clearer picture of why a problem has arisen but also what the RSPO is doing about it.	

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4.5	Conduct and act on the recommendations of a study on de-linking CBs and grower	 The original consultant's report was delivered in July 2017 and discussed at the ATF meeting in November 2017. The consultant was present and a request was made for some further development of the report which was subsequently done. The ATF were unable to reach consensus on the report – and specifically on whether it was desirable or possible to 'de-link' CBs financially from the growers they audit. In the 2018 GA a resolution proposing de-linking was rejected by the RSPO membership but the ATF, and now the ASC, continues to explore options. The legitimacy of continuing to pursue an issue that the membership have rejected and which an appointed RSPO working group has failed to reach consensus on has been questioned by some. Some elements of the report have been acted upon by the RSPO Secretariat via changes to the certification Systems documentation – an example is a proposal to limit the time that a CB can continue to audit a particular company. Where consensus was not reached progress has not been made. 	The ASC continues to have this issue on its agenda. Either the ASC or the Board need to make a decision about whether this continues to be worked on.
4.6	Develop and implement auditor and HCV assessor peer review systems	A proposal from ASI to the RSPO to establish a Peer Review system for auditors was produced in July 2019. The report provides an overview of RSPO's current peer review process, explains the results of an initial analysis by ASI, and sets out various recommendations to improve the design and effectiveness of the peer review process. The RSPO has been progressing the recommendations from the ASI concerning Peer Review: An IT platform, has been developed, an Oversight Committee has been set up between ASI and RSPO. Procedures for managing and maintaining the Registry have been established within the Certification Systems documentation – which is not yet signed off – this is expected in July 2020 However the Peer Review Registry will only be available to the RSPO and CBs. The HCVRN-ALS website can be searched for assessors that are able to lead HCV assessments.	ASC to keep an oversight of progress on this work and in particular to come to a decision about level of transparency.
PR01	Discuss the list of additional information which will be captured in the CB audit report that is publicly available on RSPO website.	This does not seem to have been discussed by the ATF. However, the draft Certification Systems document developed by the RSPO Secretariat specifies the minimum information that needs to be published. The only change proposed to the 2017 documentation is the addition of a reporting template. This issue was discussed with CBs in order to improve submission of public announcements	ASC to review the level of public reporting required in audit reports

No. and source		Current status of the work and any other observations Green – task completed, yellow – ongoing work needed and red – stalled	Recommendations
	RSPO to develop and document a system to identify and sanction fraudulent (rather than simply inadequate) CB behaviour	The report by Dr Stephan Preusser written in April 2017 concluded that 'There is little evidence that CBs are colluding with clients to cover up violations of the RSPO standard'. This would suggest that the RSPO does not think that fraudulent behaviour is happening but as this was one of the main drivers of the original Who Watches the Watchmen report and re-stated in the second report it would seem appropriate to keep the issue under review. Currently cases of suspected fraud within audits are passed to the ASI for investigation and sanction. ASI have control mechanisms in place (such as unannounced audits) to try to spot unacceptable behaviour. However, it may be useful to explore if more proactive mechanisms are possible.	

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5	Monitor RSPO members' adherence to required procedures and report all members that omit submitting NPP notifications before clearing lands to the Complaints Panel:		
5.1	Review the RSPO, ASI and HCVRN complaints mechanisms looking at accessibility and feedback systems and exploring whether the three organisations should move towards a harmonised complaints management system	Initial reviews of the relevant complaints procedures were conducted. However, it would seem that the ATF did not discuss them in any detail – but were just updated on progress of the reviews. It is also unclear if the ATF ever looked at the links between the complaints procedures of the three organisations to ensure that issues are flagged between them. In particular a decision on the merit of developing a combined system was never taken.	ASC to take up whether a combined complaints procedure is useful or what would be the best way to ensure effective coordination of the individual procedures.
5.2.1	Make the status of completed NPPs and comments available on the RSPO website	The status and any comments on NPPs are available on the RSPO website - https://www.rspo.org/certification/new-planting-procedure/public-consultations/page/ However, by definition for an NPP to appear on the RSPO website it has to have been submitted by a member. It cannot gauge whether any members are failing to submit and NPP. Therefore, it can still be questioned whether the current system is a "proactive mechanisms to identify non-compliance with the NPP" as recommended in WWW1?	ASC to review role of public elements of the NPP in driving greater compliance.
5.2.2	Make NPP and HCV maps available	 NPP and HCV maps are not available on the RSPO website due to: - concerns around poaching if HCV areas are identified; - uncertainty about the status of NPP areas – in particular data seems to suggest that about a third of land developed by RSPO members (and passed through the NPP process) never gets certified – mostly due to disposal after development has occurred. While the argument for not publishing HCV maps makes sense it is unclear why NPP areas should not be made public – if sensitive data such as HCVs can be stripped out. 	ASC must ensure that progress on mapping is made. ASC should come to a decisions about the level of transparency around HCV and NPP maps
5.2.3	Monitoring of NPP and HCV areas by the RSPO Secretariat	The RSPO Secretariat are continuing to monitor progress internally via the Deforestation Alert system under the GIS Unit. The original resolution called for cases of clearance before NPP notifications are submitted to be communicated to the Complaints Panel. Is that being done.	ASC to retain oversight of progress and ensure that issues are communicated to relevant bodies such as the Complaints Panel and the BHCVWG.
5.2.4	Develop sanctions system for non- compliance with the NPP	This is now being included in the NPP revision which has just been consulted on. A final version is expected to be endorsed in summer 2020.	None
WWW1	Develop a system to ensure that growers conduct comprehensive and adequate local consultations around NPPs (in addition to FPIC) and that the findings of such consultations are acted upon.	WWW1 specifically identified the local consultation around NPP as a potential problem. Growers control the process so are they 'ignoring' issued raised or failing to ask the right people the right questions? This does not seem to have been a focus of ATF discussions. Do we know if this is an issue?	ASC to explore the quality and effectiveness of the 30-day public consultation on NPPs.
WWW1	Improve the monitoring of compliance with NPP, FPIC, SEIA and HCV 'values' in annual audits and re-certifications	Monitoring is specifically included as a part of the new SEIA and HCV guidance documents developed by the ATF, however there is only minimal coverage of the issues in the FPIC guidance. However, FPIC is clearly seen as a process rather than a one-off assessment so could consider monitoring as inherent. It is unclear whether the ATF looked specifically at the role of annual surveillance audits and re-certification audits (and other processes such as the ACOP) in identifying possible NPP non-compliance.	ASC to explore how best within current or proposed new monitoring regimes to ensure NPP compliance.

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WWW1	Develop minimum quality criteria for NPPs Publish the criteria the RSPO use to approve NPP submissions Mandate ASI to assess the quality of NPP assessments	It is unclear whether the ATF looked at minimum criteria for NPPs or the process of RSPO sign off of NPPs. There seems to be some confusion over whether RSPO has asked ASI to also look at NPPs or not.	RSPO to clarify role mandate of ASI to include NPPs. ASC to explore these issues further.
ToR	E. Grower Performance, Internal Competency and Audit Functions • Performance reporting by growers to identify when additional requirements are evoked during the NPP.	It seems that the area of capacity and skills building within growers was not discussed within the ATF – other than in relation to the specific guidance developed.	ASC to take a strategic role in developing training, follow up and capacity building by RSPO for growers on NPP issues.
Other iss	ues related to the Assurance Systems but	not included in the resolution:	
ToR	F. RSPO's Control Mechanisms Explore options that help correct past sub- standard verification, such as compensation schemes for those suffering damages or harm from previous poor-quality assessment and/or role of insurance,	The issues around recompense and compensation for poor historic audits and assessment does not seem to have been discussed within the ATF. Questions have arisen in this study about the value of focussing on revisiting poor HCV assessments – particularly those that happened prior to the ALS being set up. A great deal of resources could be expended on this – and the question is whether those would be better spent in improving future practice instead?	ASC should take a view on the value of focussing effort on past audits and assessments and developing compensation mechanisms
WWW1	between CBs and growers in the context of	Did ATF ever look at the role of CBs and their clients in complaints investigations specifically? In light of Preusser report can we assume that there is no collusion?	ASC to keep a watching brief on issues of collusion.