

## MINUTES OF MEETING

### 50<sup>th</sup> SSC Meeting

**Time:** 1500 - 1700 (MYT)

**Date:** Thursday, 20<sup>th</sup> February 2025

**Venue:** Zoom Meeting <https://zoom.us/j/99426606106> Meeting ID: 994 2660 6106 Passcode: 50@SSC

### ATTENDEES

Name	Initial	Organisation	
1. Lim Sian Choo (Co-Chair)	LSC	Bumitama Group	Grower (INA) - Substantive
2. William Siow	WS	MPOA/IOI	Grower (MY) – Substantive
3. Guillaume Lacaze	GL	L’Oreal	Consumer Goods Manufacturer – Substantive
4. Sander Van den Ende	SvE	SIPEF	Grower (RoW) – Substantive
5. Lee Kian Wei	LKW	United Plantations	Grower (MY) – Alternate
1. Yen Hun Sung	HS	RSPO Secretariat	
2. Leena Ghosh	LG	RSPO Secretariat	
3. Akmal Razali	AR	RSPO Secretariat	
4. Ashton Lim	AL	RSPO Secretariat	
5. Wong Yi Jin	YJ	RSPO Secretariat	
6. Jasmine Ho Abdullah	JH	RSPO Secretariat	
7. Maria Papadopoulou	MP	RSPO Secretariat	
8. Muhammad Shazaley bin Abdullah	SA	RSPO Secretariat	
9. Mohd Razeleigh	MR	RSPO Secretariat	
<i>Absence with apology:</i>			
1. Olivier Tichit (Co-Chair)	OT	Musim Mas	P & T – Substantive
2. Anne Rosenbarger	AR	WRI	ENGO – Substantive
3. Suzan Cornelissen	SC	CNV	SNGO – Substantive
4. Jenny Walther-Thoss	JWT	WWF Singapore	ENGO – Substantive
5. Andrew Aeria	AA	PEMANGKIN	SNGO – Substantive
6. Brian Lariche	BL	Humana	SNGO – Alternate
7. Librian Angraeni	LA	Musim Mas	P & T – Alternate

### AGENDA

Time	Item	Agenda	PIC
1500 - 1505	1.0 1.1 1.2 1.3 1.4	<b>Opening</b> Acceptance of agenda RSPO Antitrust Law RSPO Consensus-Based Decision Making RSPO Declaration of Conflict of Interest	Co-Chairs
1505 - 1510	2.0 2.1 2.2 2.2.1 2.3	<b>Meeting Dashboard</b> Confirmation of the 49 <sup>th</sup> MoM on 23 <sup>rd</sup> January 2025 Action Tracker List of Supplementary/Derivative Documents of P&C and ISH Standard 2024 Progress Update WG/TF/SG under SSC	Co-Chairs

1510 - 1610	3.0	<b>For Endorsement</b>	
	3.1	Formal Retirement of NDJSG	AR
	3.2	Revised ToR for GHGTF	AL
	3.3	Interim SOP for the Development/Revision of Guidance Documents	HS
	3.4	Dispensation from the Composition Requirement of CGM and Retailers in the NITF	HS/LG
	3.5	ToR for Supply Chain Certification Standard Review Task Force	MP
1610 – 1655	4.0	<b>For Discussion</b>	
	4.1	Structure of Annex 5/3 (Informative Guidance) in the P&C and ISH Standard 2024 and Annex 12 (Auditor's Checklist)	HS
	4.2	Uncertified Management Units within the Certification System for P&C and ISH Standard 2024	JH/SA
1655 - 1700	5.0	<b>Any Other Business</b>	
	5.1	Smallholder seat in SSC	
1700		<b>END</b>	

**DISCUSSION:**

No.	Description	Action Points (PIC)
<b>1.0</b>	<b>Opening</b>	
1.1	The Chairs welcomed everyone to the meeting and presented the agenda of the meeting. The agenda was approved.	
1.2	The RSPO Antitrust Law, Consensus-Based Decision Making, and Declaration of Conflict of Interest were read out to the Committee. No comments were received.	
<b>2.0</b>	<b>Meeting Dashboard</b>	
2.1	<b><u>Confirmation of the 49<sup>th</sup> MoM on 23<sup>rd</sup> January 2025</u></b> The minutes of the meeting were adopted.	
2.2	<b><u>Action Trackers</u></b> Action tracker of the previous meeting was presented.  The Secretariat will share the report on the delinking commercial relationships between RSPO-accredited certification bodies and auditees with all SSC members via email.  No other comments were received.	Share the report to all SSC members <b>Action by:</b> <b>Secretariat</b>
2.2.1	<b><u>List of Supplementary/Derivation Documents of P&amp;C and ISH Standard 2024</u></b> The Secretariat presented the list of supplementary/derivation documents of P&C and ISH Standard 2024. No comments were received.	

2.3	<p><b><u>Progress Update WG/TF/SG under SSC</u></b></p> <p>The progress update for the WG/TF/SG Committee was presented. No comments were received.</p>	
3.0	<b>For Endorsement</b>	
3.1	<p><b><u>Formal Retirement of NDJSG</u></b></p> <p>The Secretariat presented the decision paper on the formal retirement of the No Deforestation Joint Steering Group (NDJSG).</p> <ul style="list-style-type: none"> <li>• The Secretariat would like to seek the SSC's approval to retire the NDJSG following the recent RSPO standards revision. The latest RSPO standards now apply the High Conservation Value-High Carbon Stock Approach (HCV-HCSA) assessment universally, resulting in the same requirements for all Units of Certification regardless of the countries they are located in. The universal application of the integrated HCV-HCSA assessment removes the need for a separate oversight body. The Biodiversity and High Conservation Value Working Group (BHCVWG) will now assume responsibility for related matters that were under NDJSG.</li> <li>• In the previous SSC meeting, the Secretariat was tasked to reach out to the NDJSG members including HCSA to see whether there's any objection to the retirement of NDJSG. The Secretariat did not receive any objection, and the only request was for the Secretariat to document the work that has been done by NDJSG and formally pass it to the BHCVWG. The Secretariat will do the necessary moving forward.</li> <li>• OT was not present for this meeting but has provided his comments and decisions required via email. His comments are as follows: <ul style="list-style-type: none"> <li>○ For Part 3.0 Recommendation, edit the sentence of "engaging HCSA experts" to "HCSA" or "HCSA and HCSA experts". He also suggested removing the second and third paragraphs as it is unnecessary to the recommendation and is already mentioned in the Background section.</li> <li>○ Take note of the request by HCSA to record activities of the NDJSG to date and pass it to the BHCVWG. This should be included as a follow up activity.</li> </ul> </li> <li>• The Secretariat has made the amendments accordingly.</li> </ul> <p>The Committee commented:</p> <ul style="list-style-type: none"> <li>• The Committee commented that the HCSA organization is essentially not in operation and it is not possible to engage with HCSA experts anymore. There is no need to continue referencing it. The Secretariat explained that the formal integration of HCSA into HCVN has not been finalized and the conversation is still happening with HCVN. Therefore,</li> </ul>	

	<p>HCSA still exists currently. In the event that HCSA still exists in the future, they could be invited to join working group meetings.</p> <ul style="list-style-type: none"> <li>• The Committee highlighted that it is an ISEAL requirement that any reference to an external standard should be based on a Memorandum of Understanding (MOU), but there is no MOU between RSPO and HCSA. Thus, there is no need to reference HCSA. The Secretariat clarified that based on ISO recommendation, an MOU is required if it refers to an external standard in a normative context. If there is no MOU, specific versions of the relevant documents must be referenced. Currently, there is an MOU between RSPO and HCVN.</li> <li>• The Committee suggested focusing solely on referencing the HCSA toolkit and proposed saying 'engaging HCSA experts as necessary' instead of referring to the organisation. The Secretariat explained that the HCSA toolkit is now under HCVN's purview. While the HCSA organization may eventually be integrated into HCVN, the specifics of its integration are still to be finalized.</li> <li>• The Committee raised concerns regarding the level of engagement with HCSA and suggested adding that they will be observers. The Secretariat reminded that the purpose of this decision paper is to retire the NDJSG. The work that was done previously within NDJSG involved HCSA. In the past, HCSA representatives or experts have been invited when necessary. The current proposal is to invite HCSA representatives or experts on a case-by-case basis, depending on the agenda for each BHCVWG meeting. It is not a requirement for HCSA to be involved in every discussion, but the option to invite them should remain available as needed.</li> <li>• The Committee suggested revising the decision paper to state that HCSA engagement should occur 'as and when required.' If HCVN is the representative or expert for the HCS methodology, particularly for the HCV-HCS joint assessment, then the reference should point to HCVN rather than HCSA experts. It should only reference one organisation as the Secretariat will be working with HCVN, which are adopting the HCS methodology and taking over some of the responsibilities previously held by HCSA.</li> <li>• The Committee recommended removing "engaging HCSA and HCSA experts as necessary" in the Recommendation part. If any experts are required, it falls under HCVN's responsibility, which will be outlined in the BHCVWG Terms of Reference (ToR). They have the authority to invite experts as necessary.</li> </ul> <p><b>Decision</b> The SSC has endorsed the decision paper subject to the changes made. The Secretariat will seek approval from SSC members who are not present via email.</p>	<p>1. Amend the decision paper accordingly 2. Seek approval from SSC members who were not present via email <b>Action by:</b> <b>Secretariat</b></p>
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<p>3.2</p>	<p><b><u>Revised ToR for GHGTF</u></b></p> <p>The Secretariat presented the decision paper on the revised Terms of Reference (ToR) for Greenhouse Gas Task Force (GHGTF).</p> <ul style="list-style-type: none"> <li>• With the adoption of the RSPO P&amp;C 2024 in November 2024, the Secretariat suggested revising the ToR to include other documents that need to be revised under the P&amp;C.</li> <li>• The proposed changes to the ToR are as follows: <ul style="list-style-type: none"> <li>○ Section 3.0: Scope of Work and Expected Outcome ('Deliverable') – to include reviewing the normative and informative documents related to PalmGHG which is GHG Assessment Procedure for New Development (Excel Tool and PDF Guidance Document), and Simplified GHG Assessment Procedure for New Development (Reference Tool for Smallholders).</li> <li>○ Section 4.0: Active Period – to include the expected timeline of the deliverable for the newly added scope of work.</li> <li>○ Section 5.0: Structure and Composition of the GHGTF – to include the additional 2 members from a new sector, Environmental NGO in the ToR. This will also be reflected in the RSPO website.</li> </ul> </li> </ul> <p>The Committee raised a question:</p> <ul style="list-style-type: none"> <li>• The Committee asked whether the public consultation period is 60 days or 30 days, and if piloting is still included, along with whether the subsequent review of this methodology a year later is included.</li> <li>• The Secretariat explained that these are two separate issues. The pilot testing for PalmGHG was completed last month. The additional scope proposed is related to the New Planting Procedure (NPP), where members will also be required to include a GHG assessment as part of the NPP. Some aspects of the methodology are adopted from PalmGHG. The online public consultation period will be at least 30 days.</li> <li>• OT provided his endorsement to this decision paper via email.</li> </ul> <p><b>Decision</b></p> <p>The SSC has endorsed the decision paper. The Secretariat will seek approval from SSC members who are not present via email.</p>	<p>Seek approval from SSC members who were not present via email</p> <p><b>Action by:</b> <b>Secretariat</b></p>
<p>3.3</p>	<p><b><u>Interim SOP for the Development/Revision of Guidance Documents</u></b></p> <p>The Secretariat presented the decision paper on the interim Standard Operating Procedure (SOP) for the development/revision of guidance documents.</p> <ul style="list-style-type: none"> <li>• Several normative and informative documents are required to be developed this year to support the 2024 P&amp;C and ISH Standard. The</li> </ul>	

current SOP on document development is incomplete, and to ensure consistency across all documents, the Secretariat has proposed an interim process for the development of normative and informative guidance documents. The proposed SOPs for these documents are outlined below:

Table 1: Normative documents

	Current RSPO SOP			Proposal for the interim SOP		
	Normative			Normative		
Development Stage	New	Existing		New	Existing	
Level of Impact	-	Major	Minor	-	Major	Minor
ToR	Not defined	Not defined	Not defined	Yes	Yes	No
Public Consultation Duration	1 round for 60 days	1 round for 30 days	Not defined	1 round for 60 days	1 round for 30 days	No
Pilot Testing	Yes	Yes	Not defined	Yes	Yes	No
Document Endorsement	SSC	SSC	SSC	SSC	SSC	SSC

Table 2: Informative documents

	Current RSPO SOP			Proposal for the interim SOP		
	Informative			Informative		
Development Stage	New	Existing		New	Existing	
Level of Impact	-	Major	Minor	-	Major	Minor
ToR	Not defined	Not defined	Not defined	Yes	Yes	No
Public Consultation Duration	1 round for 60 days	1 round for 30 days	Not defined	1 round for 60 days	1 round for 30 days	No
Pilot Testing	Not defined	Not defined	Not defined	Yes	Yes	No
Document Endorsement	SSC	SSC	SSC	SSC	SSC	SSC

- The Secretariat is seeking the SSC's endorsement on the proposed interim SOP for the development and revision of RSPO normative and informative guidance documents. This interim SOP will apply until the SOP for Standards Setting and Review (2020) is revised, which will be based on the findings and recommendations from an independent review of the Standards Review and Revision Process.

The Committee highlighted:

- The Committee asked about the difference between the current SOP and the proposed SOP. The Secretariat explained that the current SOP

	<p>does not clearly define the process for handling new and existing documents with major or minor changes. Minor changes such as editorial do not require public consultation or pilot testing. For example, the Peat Audit Guidance 2019 document is still relevant, as the indicators' content and requirements haven't changed, but the document needs to be updated due to changes in indicator numbering and certain wording. This would be considered a minor change, which would go through the responsible working group, as it pertains to editorial or stylistic adjustments rather than content or requirements. The current SOP, which will remain in place until the independent review is completed, is not clearly defined for such cases. This has created difficulty in determining whether public consultation or a ToR are necessary. Therefore, the Secretariat proposed this framework to provide clarity, outlining the requirements for document development, including the ToR, public consultation, pilot testing, etc. This will ensure everyone is aware of the documents that are being updated and the processes follow the same approach.</p> <ul style="list-style-type: none"> <li>• The Committee commented that the proposal might be too prescriptive to the Secretariat and the working groups, and that there should be some flexibility. However, if guidance is needed, the proposed approach is agreeable.</li> <li>• The Committee highlighted if the working group feels certain changes are needed, such as extending the public consultation duration, that flexibility should be allowed. The Secretariat agreed with this, and the working group can propose such changes to the SSC as the document would be submitted to the SSC for endorsement. The SSC will determine whether to endorse the working group's request. This approach will serve as a guidance as there is currently no guidance on this.</li> <li>• The Committee raised a question about the procedure for determining whether a document is normative or informative, and who makes that decision. The Secretariat explained that this will be decided by the responsible working groups or the Standards Revision Task Force. The Committee asked whether this is clearly stated because if the annexes or audit checklist were not decided by anyone, they might be categorized as normative, even though some discussions have determined that they will be informative. The Secretariat responded that the status of normative and informative documents has always been known, and this information is published on the RSPO website, shown in the action tracker, and included in the list of derivative and supplementary document statuses. The Secretariat are trying to ensure clarity on the process and when certain documents will be ready. In cases where the normative document is not finalised by the time the</li> </ul>	
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3.4	<p>standards are effective, interim measures are then required. The SSC will be updated monthly on the status of these documents.</p> <ul style="list-style-type: none"> <li>OT provided his endorsement to this decision paper via email.</li> </ul> <p><b>Decision</b></p> <p>The SSC has endorsed the decision paper. The Secretariat will seek approval from SSC members who are not present via email.</p> <p><b><u>Dispensation from the Composition Requirement of CGM and Retailers in the NITF</u></b></p> <p>The Secretariat presented the decision paper on the dispensation from the composition requirement of consumer goods manufacturers (CGM) and retailers in the National Interpretation Task Force (NITF).</p> <ul style="list-style-type: none"> <li>Similar to the decision paper presented at the previous SSC meeting regarding the dispensation of banks and investors in the NITF, the Secretariat is now seeking the SSC's endorsement for the dispensation of CGM and retailers in the NITF.</li> <li>The Secretariat is proposing this dispensation as there are several NITFs that have been initiated and are forming the NITF which require balanced representation. The decision paper does not suggest excluding CGM and retailers from the NITF; rather, it proposes to seek their participation. However, if they are unable to participate, that should not be a roadblock to the NITF's progress. It may also be particularly challenging to have CGM and retailer representation in certain geographies, such as Papua New Guinea, Solomon Islands, Sierra Leone, Guatemala, and Nicaragua.</li> <li>Currently, the Malaysia NITF is in the process to finalise the ToR and has representatives from growers, environmental and social NGOs, processors and traders, but no representatives from CGMs and retailers. The Secretariat found that there are no retailer members in Malaysia and only 7 CGM members based in Malaysia. Of the 18 existing NI countries for the 2018 P&amp;C, none of the NITF have retailer representatives, and only 6 have CGM representatives.</li> <li>The Secretariat recommended that the NITF make every effort to reach out to CGM and retailer members to be part of the NITF, but if it proves to be challenging or not possible, this dispensation would allow the NITF to proceed with sufficient P&amp;T representation.</li> </ul> <p>The Committee commented that:</p> <ul style="list-style-type: none"> <li>The Committee agreed with the dispensation as this is the reality on the ground.</li> <li>OT provided his comment via email that this can be considered on a case by case basis, but efforts should be made if there are CGM or</li> </ul>	<p>Seek approval from SSC members who were not present via email</p> <p><b>Action by:</b> <b>Secretariat</b></p>
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	<p>retailers members in the country. CGM membership is very large, and it should be possible to have CGM in every country. Retailers' memberships are smaller and issues can appear. He is agreeable if the dispensation is for retailers only but not agreeable if it covers both CGM and Retailers.</p> <ul style="list-style-type: none"> <li>• The Committee emphasised that it is crucial for CGM in every country to join as they are the ones purchasing the products and are responsible to show shared responsibility and demonstrate the intake of RSPO-certified products. If the NI was developed without their participation, it could send the message that they are not interested in sourcing more RSPO-certified products from the refineries, which does not bring positive points to the growers.</li> <li>• The Committee noted that in RSPO, member participation is often limited to a small number of individuals. Only the usual few people typically participate in RSPO activities. Given the small number of participants and the likely rotation of the participants, it may not be feasible to have consistent participation in every country where RSPO operates. Reaching out to them could be a significant challenge.</li> <li>• The Committee highlighted that there are no CGM members based in Papua New Guinea. It will be challenging to achieve a quorum at NITF if CGM participation is a requirement. While the Committee agrees on the importance of representation, the practicality of involving these members may be difficult. The reality of how limited their representation will be needs to be acknowledged, especially considering the numerous NIs that are expected to emerge. While best efforts must be made to involve the required members, if full representation cannot be achieved, they should be allowed to proceed without it.</li> <li>• The Committee commented that there have been similar challenges in achieving complete representation not only with NIs but also in working groups and task forces. Any decision made should not delay or become a stumbling block for the development of the NIs.</li> <li>• The Secretariat highlighted that the MYNI Task Force is currently ready, with only CGM and retailer representatives missing from the composition. Efforts to reach out to the CGM and retailers members have been unsuccessful, as they did not express interest in participating. The call for Expressions of Interest (EOI) has already been posted on the RSPO website. If the participation from CGM is a requirement, the Task Force will not be able to move forward.</li> <li>• The Committee agreed that it is difficult to make CGM members' participation a requirement, as the P&amp;C does not apply to them. While it is important for CGM companies to commit to the standard, applying it to the NI is challenging since the P&amp;C does not cover them. Only a</li> </ul>	
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	<p>small number of people within these companies are working on this topic. The Committee suggested targeting coalitions of companies, as they may be able to support and represent CGM interests, but making CGM participation a requirement would be difficult.</p> <ul style="list-style-type: none"> <li>• The Committee also emphasized the need to highlight to the Board of Governors (BoG) that there should be efforts or initiatives to promote the inclusion of all member categories in various activities. There is little value in having many member categories if they are not actively participating, as it undermines the purpose of having diverse groups in the certification process. The Secretariat took note of this and explained that this point has been raised with the BoG in the past but will reiterate it.</li> <li>• The Secretariat will update the decision paper to include a table listing the existing NIs and the number of members present in each NITF. This would highlight the scale of the challenge more clearly, as none of the countries with NIs have retailer members, and only one-third have CGM members. The revised decision paper will then be circulated via email for the SSC's decision.</li> </ul> <p><b>Decision</b></p> <p>The SSC has not approved this decision paper. The SSC has requested the Secretariat to revise the decision paper with additional information. The Secretariat will amend the decision paper accordingly and seek the SSC's endorsement via email.</p>	<p>1. Amend the decision paper accordingly</p> <p>2. Seek approval from all SSC members via email</p> <p><b>Action by:</b> <b>Secretariat</b></p>
3.5	<p><b><u>ToR for Supply Chain Certification Standard Review Task Force</u></b></p> <p>The Secretariat presented the decision paper on the ToR for Supply Chain Certification Standard (SCCS) Review Task Force (TF).</p> <ul style="list-style-type: none"> <li>• As per the ISEAL Code of Good Practice for Sustainability Systems ver 1.0 (Clause 6.14), each of the standards covered by the ISEAL Code should be "reviewed at least every five years, drawing on relevant data and information". The SCCS 2020 was endorsed by the RSPO BoG on 1 February 2020. A process for the SCCS revision should start by 1 February 2025 to comply with the ISEAL Code.</li> <li>• The Secretariat has initiated the current SCCS review on 10 February 2025, along with a survey for public consultation. Based on the RSPO SOP, the Secretariat proposed that a TF be established to oversee the SCCS review process. The TF and review process shall be guided by the RSPO SOP for Standard Setting and Review (2020) and ISEAL Code of Good Practice for Sustainability Systems (version 1.0) and will operate as outlined in the ToR of the SCCS Review TF.</li> <li>• The aim of the SCCS Review TF is to assess, update and revise the 2020 RSPO SCCS and to evaluate the current practices and procedures</li> </ul>	

	<p>related to Supply Chain Certification as well as suggest changes that facilitate its implementation in palm oil supply chains. The timeline of the review will be 18-months starting from March 2025.</p> <ul style="list-style-type: none"> <li>• The composition of the TF shall consist of balanced representation between different stakeholder groups including NGOs to present relevant viewpoints. The TF will comprise of a maximum of five representatives in the respective stakeholder groups: <ul style="list-style-type: none"> <li>○ Palm Oil Growers (including Smallholders representation) and Processors &amp; Traders – 5 seats</li> <li>○ Consumer Goods Manufacturers and Retailers – 5 seats</li> <li>○ NGOs and Financial Institutions &amp; Banks – 5 seats</li> </ul> </li> <li>• In addition, observers will be invited from the following sectors: <ul style="list-style-type: none"> <li>○ Certification Bodies (maximum 4 representatives)</li> <li>○ RSPO Affiliate Members; Supply Chain Associate and/or Supply Chain Group Manager (maximum 3 representatives)</li> <li>○ Other Voluntary Sustainability Scheme Organisations (maximum 3 representatives)</li> </ul> </li> <li>• The number of representatives in the task force shall not exceed 25 members.</li> <li>• The working language of the SCCS Review TF shall be in English. Drafts for public consultation and other documents may be translated into other languages if deemed necessary and depending on resource availability.</li> <li>• The TF will ensure that the SCCS review enhances clarity on its requirements and that the SCCS remains auditable, relevant, and applicable across various sectors for the next five years. The SCCS Review TF will make all decisions by consensus.</li> <li>• The RSPO Secretariat will facilitate discussions, coordinate meetings and support the TF in executing its mandate under its ToR.</li> <li>• The TF may require additional time to reach an informed decision on certain complex topics or new topics proposed by stakeholders, which could potentially extend the established 18-month timeline. However, if no such delays occur, the timeline might even be shortened.</li> <li>• The Secretariat would like to seek the SSC's endorsement on the establishment of the Task Force which will be based on the ToR for the SCCS Review.</li> </ul> <p>The Committee highlighted:</p> <ul style="list-style-type: none"> <li>• Palm oil growers, smallholders and processors and traders should not be in the same category in the composition of the TF. While processors and traders play a significant role in the supply chain, it's important to recognize that many palm oil growers also have refineries and oleochemical plants, making them a distinct group. Therefore, growers</li> </ul>	
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	<p>together with smallholders should be one category, while processors and traders should be another category. Similarly, NGOs and financial institutions should not be in the same category and the NGOs should have more seats compared to banks and financial institutions. The overall composition of 25 members should also focus solely on the representatives involved in the SCCS revision, excluding Certification Bodies (CB) and other voluntary scheme organizations who are observers and should not be counted as part of the TF membership.</p> <ul style="list-style-type: none"> <li>• The Secretariat explained that the previous SCCS review does not have a clear composition, stating only that representation should be sought from the seven ordinary categories, with no specified allocation or maximum number of seats. The actual composition of the TF from 2019 to 2020 was heavily skewed towards processors and traders which did not reflect the proportional representation RSPO strives for. This is why the Secretariat is proposing a new composition. The allocation of seats can be further discussed but the intent was to propose a balanced ratio. It will be clarified in the ToR that the observers are not part of the decision-making body, but their feedback will be considered. The 25 seats are proposed because this number is manageable as having 40 members would make consensus-building and discussions on complex topics difficult. The goal is to keep the TF size manageable, while still ensuring a balanced representation.</li> <li>• The Committee raised concerns about the possibility of having more processor and trader representatives than growers. Is there flexibility to adjust the number after the members are confirmed? The Secretariat clarified that the proposal sets a maximum number of seats. If a group doesn't reach the maximum number, the seats will be filled equally among the representatives. If there are more candidates beyond the maximum number of seats, the decision on who are the substantive and alternate members will be made by the representatives from the relevant constituency in the BoG.</li> <li>• The Committee asked whether banks and NGOs should be grouped together. The Secretariat explained that NGOs and banks can be separated, with 2 seats allocated for banks and investors. The reason for this grouping was to provide flexibility in choosing representatives. The Committee suggested separating them, with NGOs in one category and banks and investors in another.</li> <li>• The final composition agreed by the Committee is as follows: <ul style="list-style-type: none"> <li>○ Palm Oil Growers (including Smallholders) – 4 seats</li> <li>○ Processors &amp; Traders – 4 seats</li> <li>○ CGM and Retailers – 4 seats</li> <li>○ Environmental NGO and Social NGO – 6 seats</li> <li>○ Banks and Investors – 2 seats</li> </ul> </li> </ul>	
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	<ul style="list-style-type: none"> <li>As the observer should not be part of the count, the Secretariat will amend the decision paper to state that “the number of representatives in the TF shall not exceed 20 substantive members and 10 observers.”</li> <li>The Committee commented that there is no reference made to regulatory requirements, such as the EUDR, which includes traceability requirements that should be considered. These may require additional information that is not provided under the current standards. It might be helpful to reference this so that it is properly taken into consideration. The Secretariat explained that this has been addressed and included in the survey that has been rolled out. It has also been referenced in the ToR and the decision paper, as the TF will be guided by the survey results.</li> <li>The Committee raised concerns about the 18-month timeline, suggesting it might be too long and proposing for it to be shortened. The Secretariat explained that the timeline was discussed in the previous SSC meeting, where it was agreed that 18 months is preferable to 12 months. The timeline is flexible, and it is up to the TF to decide if the process can be completed earlier. The 18-month timeline was chosen as a precaution to allow for potential delays. If the timeline were set at 12 months and a delay occurred, the TF would need to seek the SSC and BoG’s approval on an extension. There was also feedback from the previous SSC meeting to leave sufficient time after the public consultation as new issues may arise, and further discussions may be necessary after reviewing the consultation results. This extra time ensures flexibility to address any emerging topics or adjustments needed after the consultation.</li> <li>The Committee raised a question about the involvement of service providers in the TF, specifically organisations such as Proforest, Transitions, which lead coalitions of companies focused on palm oil and sustainability. These organisations are part of the RSPO ecosystem and possess strong expertise in regulation and international standards that could be beneficial to the TF. Which membership categories would they fall under? The Secretariat responded that both Transitions and Proforest are RSPO members and are classified as affiliate members. They will be included under the "observers" category.</li> <li>The Committee raised concerns about the inclusion of representatives from other voluntary sustainability schemes as they are not RSPO members. These representatives should be invited for specific purposes only and should not be considered as part of the TF composition. The Secretariat explained that these representatives would be classified as observers, which are not involved in the decision making. It is an ISO requirement, which stipulates that all schemes should reach out to other similar schemes for input and mutual learning. This engagement</li> </ul>	
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	<p>helps us to understand best practices and learn how other schemes such as FSC and Bonsucro address similar challenges.</p> <ul style="list-style-type: none"> <li>OT has provided his comments via email: <ul style="list-style-type: none"> <li>The recommendation in the decision paper is not a recommendation but a summary of ToR. The recommendation should include the setting up of the TF with the proposed ToR. The Secretariat has made the amendments accordingly.</li> <li>The ToR is unclear and open-ended for Section 2: Aims and objectives on the “additional requirements”. It was also suggested to include "checkpoints" to discuss progress and the eventual additional requirements with the SSC in the timeline. The objective is to ensure a practical standard and to discuss options of additional standards rather than additional requirements in a single standard. The Secretariat will amend this accordingly.</li> </ul> </li> <li>The Secretariat highlighted that this paper is time-sensitive, as it needs to be presented to the BoG. The deadline for submitting the pre-reads to the BoG is next Tuesday.</li> </ul> <p><b>Decision</b></p> <p>The SSC has not approved this decision paper. The SSC has requested the Secretariat to amend both the decision paper and ToR according to the comments raised during the meeting. The Secretariat will amend the decision paper and ToR accordingly and seek the SSC’s endorsement via email with a deadline on Monday, 24 March 2025.</p>	<p>1. Amend the decision paper accordingly</p> <p>2. Seek approval from all SSC members via email</p> <p><b>Action by:</b> <b>Secretariat</b></p>
<b>4.0</b>	<b>For Discussion</b>	
4.1	<p><b><u>Structure of Annex 5/3 (Informative Guidance) in the P&amp;C and ISH Standard 2024 and Annex 12 (Auditor’s Checklist)</u></b></p> <p>The Secretariat provided a recap on Annex 5/3 (Informative Guidance) in the P&amp;C and ISH Standard 2024 and Annex 12 (Auditor’s Checklist).</p> <ul style="list-style-type: none"> <li>Annex 5 of the P&amp;C 2024 and Annex 3 of the ISH Standard 2024 has been classified as Informative (as agreed by RSPO BoG in October 2024).</li> <li>Annex 12 (Auditor’s Checklist) has been classified as Informative (as agreed by RSPO BoG in October 2024).</li> <li>The development of Annexes is to be completed post-adoption of the 2024 standards, with an indicative timeline of April 2025.</li> <li>The Secretariat was directed to begin work on the incorporation of the RSPO Labour Auditing Guidance (LAG) as components of other key normative and informative documents, in particular the RSPO Certification System for P&amp;C and ISH Standard and Annex 12 based on</li> </ul>	

	<p>the recommendations by Proforest in its independent review of the LAG.</p> <ul style="list-style-type: none"> <li>There is also the incorporation of proposals within the report commissioned by the Medium Grower Task Force (directed by the BoG as inputs to be addressed in the P&amp;C and ISH Standard revision in September 2021, per the closure of the MGTF) in the annexes.</li> </ul> <p>The Secretariat provided a brief recap on the LAG. Based on the independent review of the RSPO LAG conducted by Proforest, in agreement with the RSPO SSC and ASC, the RSPO Secretariat has begun to:</p> <ul style="list-style-type: none"> <li>Incorporate requirements within the LAG identified or recommended as mandatory through the independent review into the Certification System document.</li> <li>Incorporate elements identified or recommended through the independent review as guidance into Annex 12 of the Certification System.</li> <li>Remaining components of the LAG that could not be incorporated into the Certification System or Annex 12 are to be assessed for a proposed way forward which clarifies the position or necessity of the LAG. The initial assessment found that some of the in-depth detail within the LAG is not possible to be incorporated; a standalone document that applies the remaining level of details in the LAG for other principles of the standards could be developed as an eventual Auditor's Handbook.</li> <li>The structure of the LAG in regard to guidance provided for individual criteria/indicators was noted as clear and helpful, which could be applied to other indicators within the revised standards as a basis for Annex 12. This is in line with discussions within the SSC and ASC to consider an evolution towards focused- and risk-based auditing, where the importance of desktop audits that sets the foundation for ground verification during field audits is emphasised for efficiency and effectiveness.</li> </ul> <p>The Committee commented that:</p> <ul style="list-style-type: none"> <li>Incorporating certain elements of the LAG into the P&amp;C could lead to an increase in audit man-days. For example, if one estate requires one day for an audit currently, after these changes, it might take one and a half days. Some elements of the LAG are already part of the current audit process, so incorporating them further could result in more audit time without adding significant value. Auditors might spend one and a half days auditing the same things, which could create unnecessary bureaucracy.</li> <li>The Secretariat explained that a list of elements that have been incorporated into the Certification System will be prepared and</li> </ul>	
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	<p>presented to the ASC. The Secretariat acknowledged that some LAG elements are already part of the routine audits performed by the CBs. However, the new Certification System will be much clearer, and efforts will be made to ensure that the additional man-days required are minimal compared to what is currently specified in the LAG. Only slight adjustments have been added, such as specific guidelines for worker interviews and sample sizes during audits. These adjustments will result in a small increase in man-days, but it will be clearly defined to minimize unnecessary additional time.</p> <ul style="list-style-type: none"> <li>• The Committee also raised concerns that the trend seems to always be an increase in requirements rather than a reduction. The Committee emphasized the importance of implementing a risk-based approach, where unnecessary auditing practices are eliminated. Auditors often focus on aspects—such as asking if there is a policy or procedure in place—which wastes time and adds costs for growers, while critical areas like labour auditing are given less attention. Any new requirements should be offset by removing unnecessary audit activities, ensuring that audits are streamlined and more focused on actual risks. Certain elements of the audit could be managed through desktop audits and identify key indicators that do not require on-site verification. This would not only reduce costs for growers but also alleviate the operational burden of managing auditors during site visits.</li> <li>• The Committee commented that the P&amp;C are already very robust and cover all necessary aspects of the audit. Any additional requirements should serve to address specific concerns and should be mindful of the implications in the field. For instance, increasing a small number of consultations could increase costs and man-days. This may lead to increased hassle and burden at the field level without providing substantial benefits in terms of ensuring compliance or improving outcomes.</li> <li>• The Secretariat takes note of all the pertinent points the Committee raised, and efforts have already been made to address these concerns in the structure of the Annexes. ASI has also agreed that a risk-based approach is sensible, though developing this approach will take some time.</li> </ul> <p>The Secretariat presented the Medium Grower Task Force (MGTF) Report that was commissioned in 2020 by the MGTF. The study, “Towards a Profiling System for Independent Smallholders and Medium-Scale Growers” was conducted by Laura German, Katie Foster, Lowery Parker and Anna Brachey.</p> <ul style="list-style-type: none"> <li>• The study identifies three proposed scenarios for better inclusion of medium growers within RSPO certification:</li> </ul>	
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- Scenario 1 (Global profiling system). Universal definitions for medium growers (and smallholders)
- Scenario 2 (Regional profiling system). Region-specific definitions for medium growers (and smallholders)
- Scenario 3 (From profiles to process). Differentiated expectations of certification/compliance based on ability, scale and region; potential creation of separate standards for different grower profiles, or implementing support mechanisms for modular certification under a single standard
- It is possible to incorporate elements of Scenario 1 (definitions in the generic P&C/ISH Standard) and Scenario 2 (contextualisation through an NI process) in the Annexes. This can also provide better clarity/alignment with the P&C and ISH standard's interplay with Group FFB Certification.
- This approach can also be used to provide better clarity for the previously identified gap in compliance expectations of scheme smallholders certified under a UoC's P&C certificate (with contextualisation possible through an NI process).
- The Secretariat has confirmed that the interim definition of Medium Growers developed by the MGTF that was endorsed by the BoG in September 2021 was not included in the drafting of the P&C and ISH 2024. A procedural update of the P&C and ISH 2024 together with any other identified edits may be required.

The Secretariat presented the proposed structure on Annex 5/3 (Informative Guidance) in the P&C and ISH Standard 2024 and Annex 12 (Auditor's Checklist) as shown below:

Principle X		Annex 5	
Indicator		Applicability	Guidance
X.X.X	Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua. Ut enim ad minim veniam, quis nostrud exercitation ullamco laboris nisi ut aliquip ex ea commodo consequat. Duis aute irure dolor in reprehenderit in voluptate velit esse cillum dolore eu fugiat nulla pariatur. Excepteur sint occaecat cupidatat non proident, sunt in culpa qui officia deserunt mollit anim id est laborum.	<ul style="list-style-type: none"> <li>✓✗ Growers (with mill)</li> <li>✓✗ Growers (without mill)</li> <li>✓✗ Medium Growers (with mill)</li> <li>✓✗ Medium Growers (without mill)</li> <li>✓✗ Scheme smallholders (managed)</li> <li>✓✗ Scheme smallholders (supported)</li> </ul>	<p>xxxxxx</p> <div style="border: 1px solid red; padding: 5px; margin-top: 10px;"> <p><b>(Informative)</b></p> <ul style="list-style-type: none"> <li>- Provides additional context, explanation, guidance, etc for the implementation of the indicator by the UoC</li> <li>- Intended to be largely similar with Guidance from P&amp;C 2018</li> <li>- Can include references to inter-related indicators that can be implemented together</li> </ul> </div>

**(From Medium Grower Task Force Report + Proposals)**

- Denotes applicability of indicator to supply base (plantation), mill, scheme smallholders, or a combination (global profiling)
- Can be contextualised through an NI process (regional/national profiling)
- Can provide better clarity/alignment with Group Certification of FFB Production

Principle X		Annex 12 (Cert System)		
Indicator		Verification and Triangulation		
X.X.X	<p>                     Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua. Ut enim ad minim veniam, quis nostrud exercitation ullamco laboris nisi ut aliquip ex ea commodo consequat. Duis aute irure dolor in reprehenderit in voluptate velit esse cillum dolore eu fugiat nulla pariatur. Excepteur sint occaecat cupidatat non proident, sunt in culpa qui officia deserunt mollit anim id est laborum.                 </p>	<p> <b>Applicability</b>                      ✓ Growers (with mill)                      ✓ Growers (without mill)                      ✓ Medium Growers (with mill)                      ✓ Medium Growers (without mill)                      ✓ Scheme smallholders (managed)                      ✓ Scheme smallholders (supported)                 </p>	<p> <b>Document Review</b>                      xxxxxx                 </p>	<p> <b>Onsite Observations + Interviews</b>                      xxxxxx                 </p>

**(From Medium Grower TF Report + Proposals)**

- Denotes audit applicability of indicator to supply base (plantation), mill, scheme smallholders, or a combination – **Who, what, where to audit?**
- Can provide better clarity/alignment for auditing of Group Certification of FFB Production – **How to audit?**

**(Structure adapted from RSPO LAG, Informative)**

- The audit checklist for RSPO CBs/auditors
- Denotes the aspects/requirements to be checked by auditors through verification, triangulation or both
- **Document Review:** required documentation to demonstrate compliance to the indicator, can be prioritised in the pre-audit stage or desktop review phase to identify potential risks for attention during field audits
- **Onsite Observations + Interviews:** inspections, monitoring, surveillance, interviews, etc on more qualitative aspects of indicators for auditors to assess that the UoC has demonstrated compliance, can be prioritised for focus areas and/or potential risks identified during pre-stage/desktop review

Below are some examples of indicators with Annex 5/3 and Annex 12:

Principles		Annex 5		Annex 12 (Cert System)		
				Verification and/or triangulation		
Indicator		Applicability	Guidance (aka Informative Guidance)	Applicability	Document Review	
1.1.1 (C)	The Unit of Certification shall make publicly available management documents specified in the RSPO Principles and Criteria standard. This excludes confidential information.	<ul style="list-style-type: none"><li>✓ Growers (with mill)</li><li>✓ Growers (without mill)</li><li>✓ Medium Growers (with mill)</li><li>✓ Medium Growers (without mill)</li><li>✗ Scheme smallholders (managed)</li><li>✗ Scheme smallholders (supported)</li></ul>	<p>Confidential information refers to management documents where public availability or distribution is prevented by legal requirements or confidentiality agreements/concerns. This includes:</p> <p>A) Commercial/financial data (e.g., costs, income, details related to customers and/or suppliers);</p> <p>B) Data affecting personal privacy;</p> <p>C) Information where disclosure can result in potential negative environmental/social outcomes, such as sites of RTE species that can increase the risk of hunting or poaching;</p> <p>D) Information regarding sacred sites which a community wishes to maintain as private; and</p> <p>E) Ongoing disputes (within or outside of a legal mechanism) if disclosure can affect potential outcomes for all parties involved.</p> <p>This excludes access of affected stakeholders and those seeking resolution to conflict to relevant information.</p> <p>Management documents should be made available in language(s) comprehended by relevant stakeholders.</p>	<ul style="list-style-type: none"><li>✓ Growers (with mill)</li><li>✓ Growers (without mill)</li><li>✓ Medium Growers (with mill)</li><li>✓ Medium Growers (without mill)</li><li>✗ Scheme smallholders (managed)</li><li>✗ Scheme smallholders (supported)</li></ul>	<p>Management documents are complete and up-to-date, this includes:</p> <p>A) Public summary of certification assessment report;</p> <p>B) Land title/user rights (Reference: Criterion 4.1, 4.2);</p> <p>C) Occupational health and safety plans (Reference: Criterion 6.9);</p> <p>D) Action Plans and Social &amp; Environmental Impact Assessments (SEIAs), including results of FPIC processes (Reference: Criterion 3.4);</p> <p>E) HCV, HCS, and/or HDV-HCS documentation (Reference: Criterion 7.7);</p> <p>F) Pollution prevention and reduction plans (Reference: Criterion 7.7);</p> <p>G) Details of complaints and grievances (Reference: Criterion 2.4);</p> <p>H) Negotiation procedures (Criterion 4.3, 4.4);</p> <p>I) Continuous improvement plans, including social programmes to mitigate negative impact or advance livelihoods (Criterion 3.2); and</p> <p>J) Human Rights Policy, including procedures for protecting Human Rights Defenders/whistleblowers (Criterion 2.4).</p>	<p>Onsite Observations + Interviews</p> <p>Applicable management documents are available for public access. This can be in physical (e.g., document library, noticeboards) and/or digital formats (e.g., company website)</p>

- Indicator 1.1.1 - This indicator would apply to both growers with and without mills, as well as medium growers with and without mills. It would not apply to scheme smallholders, as they would be covered by the management documents of the Unit of Certification (UoC) themselves. The indicator is primarily document-based and the auditor would focus on reviewing the management documents to ensure they are complete and available. This could be done during the desktop review. The indicator also specifies that certain documents must be publicly available. The auditor would need to verify whether the documents are physically accessible—such as being posted on a notice board or available in the UoC library.

Principle 2		Annex 5		Annex 12 (Cert System)	
Indicator		Guidance		Verification and/or Triangulation	
2.3.2 (C)	<p>For all indirectly sourced FFB, the mill(s) within the Unit of Certification shall engage with such suppliers to ensure the FFB's traceability and legality. The UoC shall provide the annual percentage of its indirectly sourced FFB volume with available documentation during audits to demonstrate progress towards traceability and legality.</p> <p>Documentation* shall include: A) Geolocation of the FFB origin; B) Evidence of legal status of the land (including tenure and user rights) of the supply base and/or smallholder; and C) Where applicable, evidence of a legal business licence for the buying and selling of FFB.</p> <p><i>*National Interpretations shall determine commonly accepted local practices and customs for FFB legality that are generally accepted to be on a par with legal standing or accepted by authorities (e.g., native courts).</i></p>	<p><b>Applicability</b></p> <p>✓ Growers (with mill) ✗ Growers (without mill) ✓ Medium Growers (with mill) ✗ Medium Growers (without mill) ✗ Scheme smallholders (managed) ✗ Scheme smallholders (supported)</p>	<p><b>Guidance</b></p> <p>Indirectly sourced FFB refers to FFB that is not bought directly from suppliers, but bought through intermediaries such as collection centres and FFB distribution agents/traders.</p>	<p><b>Applicability</b></p> <p>✓ Growers (with mill) ✗ Growers (without mill) ✓ Medium Growers (with mill) ✗ Medium Growers (without mill) ✗ Scheme smallholders (managed) ✗ Scheme smallholders (supported)</p>	<p><b>Document Review</b></p> <p>- Presence of documentation showing engagement with the supplier of indirectly sourced FFB on traceability and legality (e.g., meeting minutes that show that traceability and legality was discussed on the agenda) - Presence of documentation showing records of the annual percentage of the indirectly sourced FFB volume with required documentation on traceability and legality</p> <p><b>Onsite Observations + Interviews</b></p> <p>- Observations: evidence from the mill(s) identifying steps taken for continued progress towards full traceability and legality of indirectly sourced FFB - Interview: With suppliers of indirectly sourced FFB/intermediaries to verify that the mill(s) had taken proactive steps or actions for continued progress towards achieving full traceability and legality of indirectly sourced FFB</p>

- Indicator 2.3.2 - This indicator will only apply to UoC that have a mill, specifically growers with mills and medium growers with mills. It will not apply to growers or suppliers who do not operate a mill. The

document review will focus on documents showing engagement, records and the percentage of indirectly sourced Fresh Fruit Bunches (FFB) that meet the required requirements. Observations are done to validate whether the engagements have been carried out and to assess whether any proactive measures have been taken, addressing the more qualitative aspects of the standard. If the document review is thorough and the documents are in order, the need for extensive observations and interviews may be reduced.

Principle 7		Annex 5		Annex 12 (Cert System)	
Indicator		Applicability		Verification and Triangulation	
7.3.1 (C)		Guidance		Onsite Observations + Interviews	
<p>Areas of steep terrain, marginal soils, and fragile soils shall be identified and mapped. Soil surveys and topographic information shall guide the planning of drainage and irrigation systems, roads, and other infrastructure of the Unit of Certification.</p> <p>To demonstrate the long-term suitability of land for oil palm cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, shall be taken into account in plans and operations.</p>		<p><b>Applicability</b></p> <ul style="list-style-type: none"> <li>Green Grown (with mill)</li> <li>Green Grown (without mill)</li> <li>Green Medium Growers (with mill)</li> <li>Green Medium Growers (without mill)</li> <li>Green Scheme smallholders (managed)</li> <li>Green Scheme smallholders (supported)</li> </ul> <p><b>Guidance</b></p> <p>Identified and mapped in this context means that the UoC produced and made available the map that visually depicted the steep terrain, fragile soils, and marginal soils. The common cartographic standard shall be followed in producing the map. Key characteristics of the soils' marginality and fragility shall be included on the map.</p> <p>Note: the map produced should match the disclosure from the latest RSPO LUCA submitted.</p> <p>The map produced in Indicator 7.3.1 can be included together with the indicator related to Peat Inventory (refer to Indicator 7.4.2 if the peat is categorised as fragile soil).</p>		<p><b>Applicability</b></p> <ul style="list-style-type: none"> <li>Green Grown (with mill)</li> <li>Green Grown (without mill)</li> <li>Green Medium Growers (with mill)</li> <li>Green Medium Growers (without mill)</li> <li>Green Scheme smallholders (managed)</li> <li>Green Scheme smallholders (supported)</li> </ul> <p><b>Document Review</b></p> <p>Approved RSPO LUCA report or HCV/ integrated HCV-HCS report or New Planting Procedure (NPP) report can be used as the primary reference of steep terrain, marginal soil, and fragile soil.</p> <p>Availability of the Soil map containing information about steep terrain, fragile soil, and marginal soils. The map should be included in the Peat Inventory if the peat is categorised as a fragile soil.</p>	

- Indicator 7.3.1 - This indicator applies to everyone, as all entities would have an estate or supply base. The auditor will check whether the required RSPO processes have been followed, whether there is a map, whether the LUCA report, integrated HCV-HCS report, and NPP are completed, and whether the map contains all the necessary information. Technically, on-site observations and interviews may not be needed here, as other indicators within this criterion already require the auditor to verify the validity of the map.
- This proposed approach aims to streamline the process, taking into account all the ongoing discussions and moving towards a risk-based approach. The Secretariat would like to seek SSC's feedback on whether the proposed structure is agreeable.

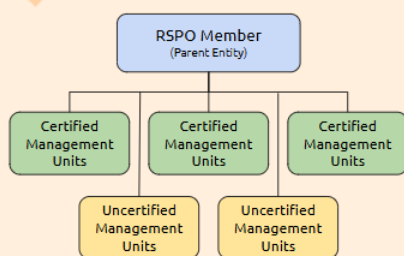
The Committee commented that:

- The Committee expressed strong support for the proposed approach, stating that it is practical and promising. It is important to push for its implementation as soon as possible, as it has a significant impact on the effectiveness of CBs and auditors. Currently, CBs and auditors spend most of their time on-site in the office, writing reports and reviewing documents, instead of observing operations. The Committee recommended more focus on it, with greater engagement with members to fast-track its inclusion in audit practices. This would benefit CBs as they would be able to focus on the more high-risk and relevant aspects of the audit and spend less time on-site, reducing costs for growers.
- The Secretariat mentioned that discussions on risk-based auditing have also taken place with the ASC, where some reservations were expressed, particularly from the NGOs in the ASC as there wasn't a visible framework for them to review. While the ASC agreed to move

	<p>towards a risk-based approach, they were hesitant to fully approve it due to the lack of a fully developed procedure. However, the direction was generally understood. The Secretariat is trying to lay the groundwork for this approach within the annexes. This will help set the stage for how a risk-based approach would be implemented, such as document reviews and risk assessments.</p> <ul style="list-style-type: none"> <li>● SvE has offered some of his certified supply bases to pilot this initiative, emphasizing that this approach is crucial to keep RSPO relevant. Over the years, the audits have become less effective, and this is the necessary step to address that issue.</li> <li>● The Committee raised a question whether the growers and CB auditors will be consulted on the development of Annex 12 before the official finalisation of the document. The Secretariat explained that Annex 12 is intended to be informative. The Secretariat has consulted with ASI regarding its structure, and ASI has provided comments and recommendations on the wording. The wording has not been fully drafted yet, as the Secretariat would like to finalize the structure first. There are planned engagements with CBs in March, specifically for auditors, as this is part of the Certification System document that is for the purpose of the audit.</li> <li>● The Committee highlighted that while Annex 12 is intended for CBs, the CB auditors will use it to assess RSPO compliance. CBs are currently facing a shortage of auditors, with new auditors who may follow the guidelines too rigidly, which could result in a non-compliance. Therefore, it's important to keep the criteria generic and not overly prescriptive.</li> <li>● The Committee also commented that while the focus is on CBs, everyone in the supply chain is impacted as the audits will ultimately be conducted at the growers' sites. The Committee recommended having a consultation with the growers to ensure the annex is more practical, auditable, and implementable.</li> <li>● The Secretariat takes note of the importance of consulting the members and reviewing the wordings to make it less prescriptive. The timeline for the Certification System will be reconsidered, and any updates regarding the timeline or further consultations will be communicated to the SSC via email. The Committee also requested that enough time be given for them to thoroughly review the document, and the Secretariat will take note of this.</li> <li>● OT has provided his recommendation via email to put a clause clearly stating that CB can adapt the Annex 12 list as needed by the UoC conditions.</li> <li>● The Committee raised questions regarding the definition of medium-sized growers. The Secretariat explained that there are two aspects to</li> </ul>	<p>Update SSC on consultations for Annex 12</p> <p><b>Action by:</b> <b>Secretariat</b></p>
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4.2	<p>consider: the interview definition that was endorsed by the BoG in September 2021, and is not included in the current P&amp;C. This could be addressed through a procedural update, specifically by updating the 2024 Standards, where the definition would be clarified. This process would involve editorial and procedural updates for clarity, without altering the content. The Secretariat proposed that this update be done in July, as the BHCVWG also has some proposals to edit the definition, and it would be more efficient to address both at the same time.</p> <p><b><u>Requirements on Uncertified Management Unit(s) in the Certification System for P&amp;C and ISH Standard 2024</u></b></p> <p>The Secretariat presented a more detailed proposal to include the requirements on Uncertified Management Unit(s) in the Certification System for P&amp;C and ISH Standard 2024 as requested from the previous SSC meeting.</p> <ul style="list-style-type: none"> <li>• Currently, the compliance with the Uncertified Management Unit (UMU) is assessed during every audit at the individual UoC, conducted by each CB.</li> <li>• If a non-conformity (NC) related to UMU non-compliance is identified during an audit of a certified unit, the following consequences arise:             <ul style="list-style-type: none"> <li>○ A Major NC is issued, regardless of whether the non-compliance is directly related to the audited unit.</li> <li>○ Failure to address the Major NC within the stipulated timeline jeopardizes the certification status of the audited unit, even when the root issue lies outside its operational scope.</li> <li>○ CB may conduct further investigation, but it is not included in the original certification service agreement which results in less effort to make further investigation.</li> <li>○ Difficulties for auditor to verify compliance of requirement since audit is only attended by representatives for the respective UoC.</li> </ul> </li> <li>• This approach disproportionately penalises the audited UoC, leading to perceptions of unfairness and undermining stakeholder confidence in the RSPO certification process.</li> <li>• The current procedure is shown in the diagram below:</li> </ul>	
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## What are the existing procedures?



### 1. TBP

RSPO Member (Parent Entity) will have to register all management units (owned/directly managed) in the Time Bound Plan (TBP).

### 2. Self Assessment

RSPO Member (Parent Entity) will conduct self assessment on the UMU on the compliance against the requirements related to Land conflicts, Labour disputes, Legal non-compliance, and No replacement of primary forest or any area required to maintain or enhance HCVs and HCS.

### 3. Positive Assurance Statement

RSPO Member (Parent Entity) will need to issue a positive assurance statement based on the self assessment made.

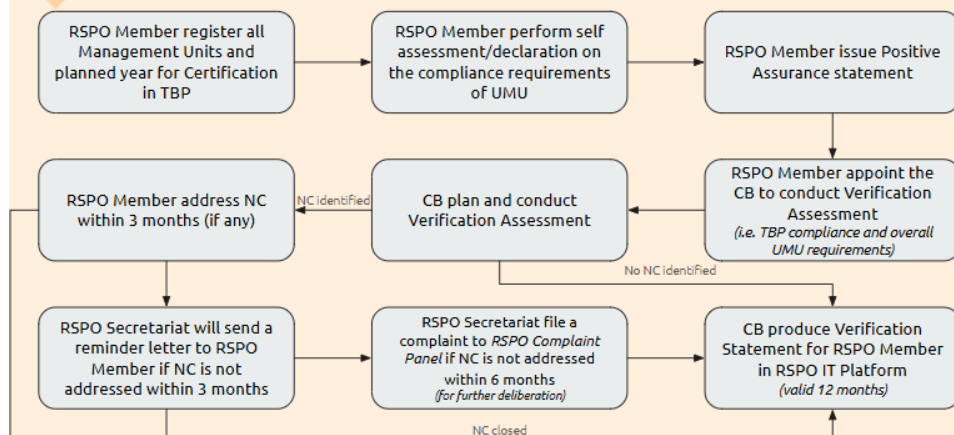
### 4. Verification

However, the compliance of the self assessment and positive assurance statement (For the UMU) will be assessed by the CB at every Certified Management Unit level.

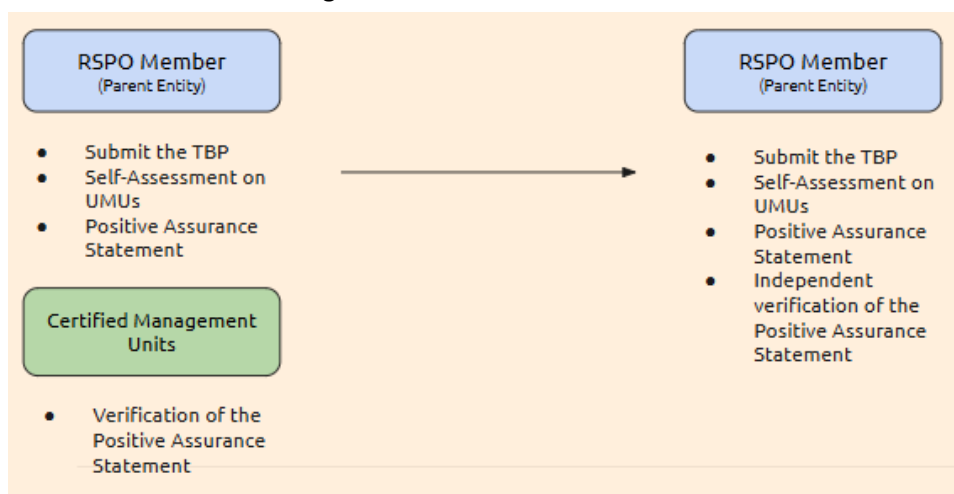
- When verification is done at the Certified Management Unit level instead of the Parent level, this issue is that:
  - The verification on the UMUs will be repeated for each Certified Management Units. (For example, if there are 3 Certified MUs, there will be 3 verifications being done on the same Positive Assurance Statements).
  - In the case where verification of the UMUs is conducted by different CBs, it might come with different levels of scrutiny (level investigation/verification).
  - In the current RSPO Certification System document 2020, it did not specify a timeframe for reviewing the UMU requirements. As a result, CBs have had limited time to assess compliance with these requirements, leading to a minimal number of reported non-compliance cases at the UMU.
  - The certification status of the Certified Management Units will be impacted by the compliance of the UMUs to the requirements on UMUs, even though the UMUs are out of the control of the Certified Management Units.
- The Secretariat is proposing an additional statement to the current process. The first few steps (TBP, Self Assessment and Positive Assurance Statement) will remain the same, but for the verification, instead of compliance conducted at every Certified Management Units, verification of compliance of the Self Assessment and Positive Assurance Statement will be done at the RSPO Member (Parent Entity) level, and therefore will only be done once per RSPO Member annually.
- The flowchart of the proposal is shown below:



## Details of the Proposal



- The new process is where RSPO members appoint a CB to conduct the Verification Assessment at the Parent level. There was a question raised by an SSC member during the previous meeting whether a Parent entity could appoint more than one CB for the verification assessment. The Secretariat clarified that there is no issue with appointing multiple CBs, if the RSPO member wishes. It will depend on the decision of the RSPO member.
- The difference between the current process and the proposed process is shown in the diagram below.



- The proposed process will streamline and consolidate the TBP and UMU verification process, moving the verification entirely to the Parent level, instead of splitting it between the Parent and Certified Management Unit levels. This will ensure a smoother and more credible process as the Parent entity generally has more control over the UMUs than the UoC itself. The UoC typically operates at the subsidiary level, while the UMU may belong to a different subsidiary under the same Parent entity. Therefore, the Parent entity is always in a better position to oversee and manage the UMU. The key point of this proposal is that

even if an NC is identified, it will not affect the certification status of the existing certified Units of Certification (UoCs).

The Committee commented:

- The Committee raised a concern whether this situation would be captured under the complaints system. If there is non-compliance and the head office provides a response indicating that certain issues cannot be closed yet, would this still be considered part of the complaints process? If the issue cannot be resolved within the 6-month period, can the timeline be extended if the response provided is reasonable and justifiable? Would this still be counted as a complaint?
- The Secretariat clarified that the NCs would be addressed similarly to how other NCs are typically handled. If an issue is identified during the verification assessment and the member has made reasonable efforts to show the CB that corrective actions are being taken, but a resolution has not been reached, additional time may be granted to resolve the issue. If a proper management plan is in place and the CB agrees to verify the NC in the next cycle, the matter will not be escalated to the Complaints Panel.
- The Committee asked about the process of bringing this matter to the Complaints Panel, since it has not been included in the CAP review. The Secretariat clarified that the RSPO Secretariat, through the CEO, has the authority to raise a complaint about RSPO members to the Complaints Panel if necessary.
- The Committee highlighted that the Complaints Panel has raised a concern regarding the UMU as the CAP review does not permit reviewing the UMU. The Secretariat responded that internal communication has already taken place within RSPO with the Head of Grievance, and they are aware of the situation. Further investigation will be conducted to determine if there are any potential loopholes that need to be addressed before proceeding with this matter.
- The Committee commented that the existing approach already includes oversight of the UMU. When an NC or complaint is raised, the UMU enters the complaint system, which will impact the entire group. There is no need to address this matter or standardize the process, as it doesn't have a significant impact. The assumption that the Parent entity knows better than the management units is not entirely accurate. Many companies have decentralized management systems, where management units often have a better understanding of certain aspects than the Parent entity.
- The Secretariat clarified that the current issue is that UMUs are not being audited, whereas the certified units are being audited. This is why the Secretariat believes that some Parent entities have better control



	<p>over the UMUs. Since the UoC is already certified by the CB, any issues at the UoC are likely being managed there. However, for the UMUs, which are not yet audited or certified (and may only be certified in the next 2-3 years), the Parent entity is likely to have a better understanding and oversight of the situation. In terms of complaints or allegations related to UMUs, the Secretariat clarified that such allegations would be rejected by the Complaints Panel since the UMUs are not yet subject to the same certification and audit processes as the UoCs.</p> <ul style="list-style-type: none"> <li>• The Committee expressed strong opposition to the current proposal and suggested that the focus should instead be on encouraging downstream companies to buy more certified products and pay higher premiums, particularly for smallholders, rather than adding more audits and costs. The issues with UMUs are already being addressed by members, and there is no need to further complicate the system.</li> <li>• The Committee recommended putting the entire idea on hold until other more pressing issues are addressed. The Secretariat took note of the Committee's concerns and will revisit the matter at an appropriate time in the future.</li> </ul>	
<b>5.0</b>	<b>Any Other Business</b>	
5.1	<p><b><u>Smallholder seat in SSC</u></b></p> <p>The Secretariat has reached out to the Smallholder Unit and is currently trying to identify members to represent smallholders in the SSC. There's no confirmation yet and the Secretariat will continue looking for representatives.</p>	Follow up on Smallholder representative in SSC
5.2	<p><b><u>Prisma issues</u></b></p> <p>The Committee highlighted that all the growers have submitted complaint letters about fundamental issues with prisma. The grower caucuses from Malaysia, Indonesia, and the Rest of the World (RoW) have sent letters to RSPO, detailing specific issues caused by prisma's ineffective rollout. While some issues are being addressed, there are still fundamental problems, especially concerning the liability disclosures within the modules. As the concerns include standards as well, the Committee requested that this be included in the agenda of the SSC meetings. The Secretariat will take note of this.</p>	<p><b>Action by:</b> <b>Secretariat</b></p> <p>Include prisma as agenda in SSC meetings <b>Action by:</b> <b>Secretariat</b></p>
5.3	<p><b><u>SSC Meeting Agenda</u></b></p> <p>The Committee commented that the meeting today was quite heavy due to the large number of documents to review. It was suggested that future meetings be spaced out more effectively to make the process more manageable. The Secretariat will take note of this.</p>	