

No	Criteria/Indicator	Comment
1	General	How does the transition period work? Will the UoCs receive NCs during the transition period if they choose to implement the new standard? How does the interim revision impact the NCs?
2	General	The standard have already been delayed for a year, and we have the NI process to deal with as well. How will RSPO address this? Can the ToR also address the transition period.
3	General	I suggest that the NI process is already ready to start immediately upon endorsement, and PRiSMA is updated. This is because the NI takes time to recruit people.
4	General	RSPO Standard is strong. However, justifications should be presented along with the revised criteria during the Stakeholder Consultations for clarity purpose.
5	General	Will there be changed to the NI process because of the official transition period and the interim revision process?
6	General	Will there be pilot testing of the standard before adoption? If there are no pilot testing, what is there are substantive issues?
7	General	Is there is a difference between translations of the french and english version, which one will prevail?
8	General	Clarity on who are the affected commuties ie diff between those who own the land itself and those are not landowners but potentially being affected by the activities from the planting
9	General	The Scope of Standards Revision on the commercial definition
10	General	Which standard should a new applicant apply to? Especially during the interim period
11	General	Normative wordings (shall) are found in all the columns (indicator, compliance requirement, informative guidance, and compliance checklist). It is not clear which requirement (maybe all?) would apply to the UoC and which requirements would the auditors evaluate/audit against. Also, considering that auditors usually need to evaluate conformance OR raise non-conformance against a specific indicator (with normative wordings) with clear reference for example against Indicator 7.1.1, it is not clear how this is new set of P&C will be implemented in the practice.
12	General	the proposal to delete the requirement in the P&C for FPIC in 'existing plantations'. This marks a major weakening of the RSPO standard. Since RSPO first adopted the P&C, it has always upheld a standard that opposes 'land grabbing' (ie lands taken without consent). To weaken this protection will seriously damage the RSPO's credibility.
13	General	RSPO will move the Compliance Requirements, Informative Guidance, and Compliance Checklist to a separate document.
14	General	RSPO believes there is a need for a representative from Malaysia in the SG.
15	General	MPOA believes that the drafting guidelines are acceptable and do not affect the intent of Draft 3 indicators and criteria.
16	General	MPOA does not agree with conducting a public consultation without first consulting RSPO members.
17	General	MPOA request for specific session to go through what requirement in the "Compliance Requirement"
18	General	Implementation More clarity is needed on how the new standard will be phased in, considering existing and applicant certificate holders and also the Nis.

No	Criteria/Indicator	Comment
19	General	<p>Structure</p> <ul style="list-style-type: none"> - The standard needs alignment, some of the criteria are short and to the point, others are very long and contain text that should be in the indicators. - There is quite significant unnecessary text in the criteria and indicators that could be trimmed back to have a more streamlined standard. - The draft includes subjective terms such as “progressive”, “holistic” these and similar terms should be removed, unless definitions are provided. - Multiple indicators mix several requirements, that should be split into separate indicators. For example 6.9.5: <ul style="list-style-type: none"> - PPE is provided - Training on PPE is implemented - Records are kept - Washing facilities are available - The term “socialize” is used in many indicators. This is quite a regional term, mainly used in Indonesia, suggest replacing this with “communicated” or another suitable term. - The requirements related to chemical handling are scattered, would be much more effective to have them grouped. - There are references to several documents that are yet to be developed, in the meantime UoC can use existing methodologies. This is problematic and subjective and it will be difficult to audit. See indicator 6.8.4. RSPO should specify the methodologies.
20	General	<p>Standard requirements</p> <ul style="list-style-type: none"> - Remediation measures have been introduced for workplace harassment and trafficked labor. These will require more guidance. I don't think we will find many UoC that have remediation measures for workplace harassment at the moment. - There should be a general requirement for record keeping for a minimum of 5 years. Record keeping is mentioned under one of the labor indicators and one of the indicators related to remediation but instead there should be just a blanket requirement for all indicators to keep records for 5 years. - I noticed that the draft includes a ban of worst forms of child labor additionally to child labour. I was under the impression that child labour covers all forms of child labour. I looked at the definition of “worst form of child labour” and its covers aspects such as slavery, sexual exploitation, drug trafficking. I wonder if there is an actual risks of such scenarios in an oil palm plantation. - I also wanted to flag that, 6.9.11 states that the UoC provides medical care to all workers. This suggests that the UoC is responsible for all medical care costs of the workers. If this is the intent than fine, I just wanted to flag this. Related to this, 6.2.8 requires educational facilities. Do we mean schools? This really needs clarity. - The requirements on housing should be much more detailed if we want to have an impact on workers housing. The current draft uses the same or similar language as the RSPO PC 2018 which has not driven improvements in the workers housing.

No	Criteria/Indicator	Comment
21	General	<p>Deforestation Definition (P&C)</p> <p>Deforestation definition : The wording does not align with FAO (EUDR) or AFI definitions. I recommend using distinct definitions for deforestation, degradation, and conversion. It is also important to ensure the deforestation definition itself is aligned with FAO/EUDR definition.</p> <p>The EUDR uses the following definition of deforestation – ‘The conversion of forest to agricultural use, whether human-induced or not’, in which a forest is defined as ‘Land spanning more than 0,5 hectares with trees higher than 5 meters and a canopy cover of more than 10%, or trees able to reach those thresholds in situ, excluding land that is predominantly under agricultural or urban land use’.</p> <p>AFI Definition of Deforestation : Deforestation: The loss of natural forest as a result of: - conversion to agriculture or other non-forest land use; - conversion to a plantation; or - severe or sustained degradation</p>
22	General	<p>Regarding indicator 7.7.2 P&C</p> <p>In comparison to the 2018 Standard, the important element for HCV M&M (Monitoring and Management) is missing. The requirement for HCV IMP (integrated management plan) is not mentioned in this new indicator. - This indicator was classified as a Major indicator in the previous version. Why has it been reclassified as a Minor indicator in the 2024 revision?</p>
23	General	<p>Regarding indicator 7.7.5 P&C</p> <p>In comparison to the 2018 standard, 2 important elements are missing in the 2024 version for this indicator. 1. A mandatory program for educating the workforce about the status of RTE species in place. 2. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. The new revision of the P&C should establish a more robust and credible standard, ensuring it is stronger than the previous version.</p>
24	General	<p>Regarding the definition of deforestation in the P&C</p> <p>Deforestation definition : The current wording does not fully align with the definitions provided by FAO (EUDR) or AFI definitions. Ensuring consistency with these definitions is crucial for maintaining both accuracy and compliance with International framework and EU regulations. The EUDR uses the following definition of deforestation – ‘The conversion of forest to agricultural use, whether human-induced or not’, in which a forest is defined as ‘Land spanning more than 0,5 hectares with trees higher than 5 meters and a canopy cover of more than 10%, or trees able to reach those thresholds in situ, excluding land that is predominantly under agricultural or urban land use’. AFI Definition of Deforestation : Deforestation: The loss of natural forest as a result of: - conversion to agriculture or other non-forest land use; - conversion to a plantation; or - severe or sustained degradation</p>
25	General	<p>General Comment:</p> <p>Outcome-based wordings to be pushed to the end of the indicator for coherence and consistency.</p> <p>Feedback Type: Technical, Text/Wordsmithing</p>

No	Criteria/Indicator	Comment
26	General	The current structure is not quite suitable for P&C and more applicable for audit checklist. Feedback Type: Other (Please Specify) - N/A
27	General	There are additional requests in the compliance requirements which is not particularly beneficial. Feedback Type: Procedural
28	General	There is inconsistency in the usage of normative/informative language. Feedback Type: Text/Wordsmithing
29	General	There are issues on the drafting process whereby the rationales used for transition from Draft 3 to the current one are not explicitly shown/explained. Feedback Type: Procedural
30	General	There is a potential risk of confusion during implementation with the current structure as these items are not addressed in a proper, structured manner: 1) identification vs implementation 2) environmental and social HCVs 3) the references of a particular methodology and/or partner organisation are kept neutral. Hence it might affect credibility and rigor of the approach. Feedback Type: Implementability/Auditability
31	General	Comments on the Process: P&C Consultation Feedback Type: Technical Presenting the new draft vs "draft 3" distracts from the only comparison that is meaningful: current draft vs 2018 P&C. All changes made should be compared to the 2018 P&C, not to Draft 3.
32	General	Comments on the Process: P&C Draft development Feedback Type: transparency Draft incorporating changes without clear reasoning for them (was the previous 2018 criterion/indicator not auditable? not implementable? unclear?). Referencing Draft 3 is not a meaningful reference.

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33	General	<p>Comments on the Process: P&C Consultation</p> <p>Feedback Type: Procedural</p> <p>Sharing multiple versions of the same "draft" without properly identifying them as such. This includes starting the consultation with a document that merged the ISH+growers P&Cs into one and added "implementation guidance", "compliance requirements" and compliance checklist", then sharing separate versions of the growers and ISH P&C... with the other contents disappearing from the consultation (this is concerning also since some 2018 P&C content had been moved from the indicator to "compliance requirements"). This makes comments to earlier versions appear irrelevant, causes double or triple work to stakeholders, as comments need to be revised for relevance.</p>
34	General	<p>Comments on the Process: P&C Consultation</p> <p>Feedback Type: transparency</p> <p>The growers P&C appears to have been tweaked since the first version was presented, seemingly to incorporate some suggestions from the public. But this is not documented.</p>
35	General	<p>Comments on the Process: P&C Consultation</p> <p>Feedback Type: transparency</p> <p>Misclassifying changes that are substantial as related to text/wordsmithing. This misleads the public when trying to focus on more critical changes</p>
36	General	<p>Comments on the Process: P&C Consultation</p> <p>Feedback Type: transparency</p> <p>While the "draft" has more than one version, there is no documentation of the changes made (and the reasoning behind it) since the first document version was shared.</p>
37	General	<p>Comments on the Process: P&C Draft development</p> <p>Feedback Type: Technical</p> <p>First version shared for consultation was confusing because:</p> <ul style="list-style-type: none"> a) the document seemed intended for two different audiences (the member and the auditors) b) the document mixed "guidance" (optional) with compliance requirement (mandatory).

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38	General	<p>Comments on the Process: P&C Draft development</p> <p>Feedback Type: Procedural</p> <p>Reference to a "Draft 3" that was never shared publicly with stakeholders and which did not incorporate much of the feedback provided though the Technical Panels, nor provided explanation for not accepting the suggestions.</p>
39	General	<p>Comments on the Process: P&C Consultation</p> <p>Feedback Type: Procedural</p> <p>Sharing different formats for feedback (word document, shared google doc)</p>
40	General	<p>Normative wordings (shall) are found in all the columns (indicator, compliance requirement, informative guidance, and compliance checklist). It is not clear which requirement (maybe all?) would apply to the UoC and which requirements would the auditors evaluate/audit against.</p> <p>Also, considering that auditors usually need to evaluate conformance OR raise non-conformance against a specific indicator (with normative wordings) with clear reference for example against Indicator 7.1.1, it is not clear how this is new set of P&C will be implemented in the practice.</p> <p>Feedback Type: Text/Wordsmithing</p>
41	General	<p>It was flagged in BHCVWG meetings by those with auditing experience that the wording of many criteria and indicators may lead to these not being audited as intended. Need to be clear on what the aim of the indicator is and then ensure wording leads to the right auditing. E.g., if it is written in an indicator that a company 'shall prohibit' something, this may just mean the auditor looks at policies/procedures rather than implementation. These kind of risks need to be checked and addressed throughout the Standard.</p> <p>Feedback Type: Implementability/Auditability</p>
42	General	<p>Throughout the P&C document there are several places where requirements within the indicators have been removed as part of efforts to 'simplify' indicators. In some cases these have been moved to guidance instead, which is concerning since 1) we have been told not to consider the guidance as part of this review process, so there is no feedback being provided on what has been moved there, and 2) guidance is by definition not a requirement - therefore several things that were previously requirements under the P&C are now suggested to be merely optional. This presents a serious risk of weakening the Standard compared to the 2018 P&C, which is not acceptable. We urge that anything moved to guidance which is still intended to be a requirement has t be re-inserted into the text of the Criteria and Indicators. Anything that has been removed should be clearly justified to clarify how it does not weaken the P&C.</p> <p>Feedback Type: Implementability/Auditability</p> <p>Note: Major concern - weakening of the P&C</p>

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43	General	<p>We are aware that due to a review of ISEAL requirements, and an apparent desire to be less prescriptive, the Secretariat has removed references to third-party standards or methodologies throughout, and in some cases moved these to guidance. We feel this is a case of allowing technicalities to lead the shaping of the requirements, rather than agreed best practice. Without a clear requirement on methodologies to be used, there is no longer a standardised approach for companies to take on some key issues, and there is a lot of room for interpretation as to how criteria and indicators should be met. There is a risk of this leading to a variety of different approaches being taken yet all being labelled as 'RSPO certified' - this defeats the point of having a standard, which by definition is about ensuring a standardised approach is taken which meets requirements. Of key concern to us is the removal of reference to the HCV and HCS methodologies - see comments below on this. We are unlikely to be able to endorse a standard in which these best-practice methodologies for identifying HCVs and HCS are no longer requirements - we would see this as a severe weakening compared to the 2018 P&C and a blow to company efforts so far to reduce deforestation in this sector.</p> <p>Following comment above - it should also be noted that there is a requirement within the ISEAL Code of Good Practice (7.3) that "The scheme owner defines requirements and procedures for each type of assessment implemented within the assurance system". Removing references throughout the P&C to specific methodologies (such as HCV and HCS methodologies) and leaving approaches open to individual interpretation is arguably in breach of this requirement.</p> <p>Feedback Type:Implementability/Auditability</p> <p>Note: "Major concern - weakening of the P&C</p> <p>https://www.isealalliance.org/defining-credible-practice/iseal-code-good-practice"</p>

No	Criteria/Indicator	Comment (English)
1	Introduction	<p>Introduction:</p> <p>In view of the inability of both the RSPO Task Force on the Revision of the Principles and Criteria (P&C) and the Steering Group to agree a text in 2023, the Secretariat was asked to develop a revised version of the P&C for further consultation. In making this request the Secretariat was asked to propose texts that resolve matters of disagreement but which should not weaken any requirements in the 2018 P&C (2018).</p> <p>After reviewing the Secretariat's draft (SD 2024) which is now being shared for consultation with the membership, we find there has been systematic weakening of social protections.</p> <p>SD 2024 is weaker than 2018 with respect to deletions of requirements re:</p> <ul style="list-style-type: none"> · information sharing with stakeholders, · the need to uphold ratified international laws, · having a system to track legal changes, · no planting beyond legal boundaries, · making explicit reference to Human Rights Defenders, · prohibiting the use of mercenaries and paramilitaries · providing adequate mechanisms for conflict resolution · free, prior and informed consent in existing operations · ensuring communities can choose their own representative institutions · fair and mutually agreed processes of land acquisition and compensation · mutually agreed conflict resolution mechanisms. <p>Even requirements for Free, Prior and Informed Consent in New Plantings are substantially weakened. These matters are detailed further below.</p>
2	Preamble	<p>The addition of the "compliance requirements" and "compliance checklist" columns is not relevant in this P&C draft because the compliance checklist already exists in the checklists held by each certification body and has been developed according to the needs for conformity assessment with the requirements requested by each principle and criterion. Meanwhile, the content of the compliance requirements seems to be points that were previously in the guidelines section (P&C RSPO 2018) that have been elevated to normative status after being given a new category, namely "Compliance Requirements."</p>
3	Preamble	<p>Including plasma farmers as a category that implements part 1 of P&C version 4.0 is quite a challenge considering the ability, capability and resource support of plasma farmers will not be as large as companies in general to be able to meet the principles and criteria requested. It is necessary to consider for plasma farmers to implement part II of P&C version 4.0 (the same as independent farmers)</p>

No	Criteria/Indicator	Comment (English)
1	Definition	<p>Deforestation: The wording is not in line with FAO (EUDR) nor with AFI definition. We would recommend using separate definitions for deforestation, degradation, and conversion</p> <p>Feedback type: Technical</p>
2	Definition	<p>Existing plantation: Unclear why the definition is limited to plantation establishment prior to RSPO membership, but excluding plantation established by RSPO members/UoC since 2005</p> <p>Feedback type: Technical</p>
3	Definition	<p>Geolocation: Incomplete quote from the reference, to add: “For relevant commodities other than cattle, for plots of land of more than 4 hectares, the geographical location shall be provided using polygons, meaning sufficient latitude and longitude points to describe the perimeter of each plot of land”</p> <p>Feedback type: Text/Wordsmithing</p>
4	Definition	<p>HHP: There needs to be a definitive list on HHP. The list should be developed and updated by RSPO</p> <p>Feedback type: Technical</p>
5	Definition	<p>Indigenous People: Definition is not fully aligned with the UNDRIP and AFI definition (which should be quoted without further modification)</p> <p>Feedback type: Technical</p>
6	Definition	<p>Precautionary approach: An internationally used standard definition for the precautionary approach should be given. We recommend adopting the same definition as in the HCV-HCS manual 2023 (from FSC P&C): “applying explicit and effective measures when there is a threat of severe or irreversible damage to the environment or a threat to human welfare, to prevent the damage and reduce the risks. These measures are applied even when the scientific information is incomplete or inconclusive, and when the vulnerability and sensitivity of values are uncertain.”</p> <p>Feedback type: Technical</p>
7	Definition	<p>RTE Species: The definition is too narrow (it doesn’t include CITES/trade restricted species, locally/nationally protected species for example). We recommend following the definition of RTE species as in the HCV Common Guidance for Identification (page 26)</p> <p>Feedback type: Technical</p>

No	Criteria/Indicator	Comment (English)
8	Definition	<p>General comment: Need for additional definitions - There are important terms in the draft for which there is no definition. Those we noted included: “Fair”, “Balanced”, and “Premium” – the definitions of which have significance HCVN feedback on Principle 7</p> <p>Feedback type: Implementability/Auditability</p>
9	Definition	<p>The definition for smallholders should use the definition in the RSPO 2018 P&C which is more complete in its description. It is also necessary to add definitions for independent smallholders and plasma smallholders to be relevant to principle 5 whose indicators also discuss independent smallholders. The definition for independent smallholders and plasma smallholders should also follow the definition in the RSPO 2018 P&C which is already good.</p>
10	Definition	<p>A definition for invasive alien species is not necessary as it is not included in the discussion of the indicators related to invasive species.</p>
11	Definition	<p>A. Proposed new definition - High Carbon Stock Forest</p> <p>High Carbon Stock (HCS) forests are defined as vegetation on the land that could be categorized as High Density Forest, Medium Density Forest, Low Density Forest or Young Regenerating Forest. (Refer to link, Page 18 - Potential HCS Forests)</p> <p>HCSA-Membership-Requirements-Code-of-Conduct-2020-.pdf (highcarbonstock.org)</p> <p>High Carbon Stock forests are identified using the High Carbon Stock Toolkit.</p> <p>The High Carbon Stock Approach Toolkit is governed by the High Carbon Stock Approach.</p> <p>The RSPO does not provide a definition of HCS forest. This is a critical omission that must be addressed. The HCSA recommends adding in the HCSA's definition of HCS forests and referring to</p> <p>This needs to be addressed in any formal agreement with HCVN or HCSA on terms of usage.</p>

No	Criteria/Indicator	Comment (English)
12	Definition	<p>Proposed New Definition - High Carbon Stock Approach</p> <p>The High Carbon Stock Approach is a methodology for integrated land use planning that helps companies to identify natural forests (aligned with the AFi's definition) and develop measures for their protection. It includes a multi-step site planning process that integrates spatial and ecological planning, participatory land-use planning, environmental and social impact, and other relevant assessments. Companies can use the HCSA to support responsible site acquisition, site establishment, and land management.</p> <p>The HCSA methodology can be applied for any commodity and in any tropical moist forest landscape. In addition to natural forests, its scope includes certain other natural ecosystems that are found within tropical moist forest landscapes. These include peat soils of any depth as well as High Conservation Value (HCV) areas such as riparian zones. The HCSA is not currently applicable outside of tropical moist forest landscapes and therefore does not address the no-conversion elements of the Accountability Framework (Core Principle 1.2) outside of these contexts, for instance in grassland and savannah biomes.</p> <p>The HCSA also includes social requirements that align with the Accountability Framework's Core Principles on respecting the rights of Indigenous Peoples, local communities, and workers. The HCSA methodology for developing an Integrated Conservation and Land Use Plan (ICLUP) further supports putting these principles into practice.</p> <p>The HCSA Restoration and Remediation Guidance outlines principles and criteria for ecological restoration and social remedy in situations where High Carbon Stock forests, HCV areas, peatlands, or community lands were cleared or degraded contrary to the requirements or process of the HCSA. This restoration and remediation guidance is closely aligned with the Accountability Framework's Core Principle 9.</p> <p>The HCSA recommends adding in a definition and reference to the HCSA - the entity that governs the High Carbon Stock Toolkit.</p> <p>Refer link to the HCSA website : https://highcarbonstock.org/</p> <p>and the description published by the AFi (copied in red)</p> <p>https://accountability-framework.org/use-the-accountability-framework/for-companies/manage-production-supply-chains/manage-production/land-use-tools/#:~:text=The%20High%20Carbon%20Stock%20Approach,develop%20measures%20for%20their%20protection.</p>

No	Criteria/Indicator	Comment (English)
13	Definition	<p>There is no clear definition of natural forests. The HCSA was developed to provide a practical methodology to identify natural forests which need to be protected. The final RSPO definition of natural forests should make reference to this methodology. https://highcarbonstock.org/toolkit/</p> <p>The HCSA recommends explicitly excluding plantation forests and forests with a high degree of non-native trees from the definition of natural forests. The RSPO should use the HCSA definition with cutoffs linked to basal area of non-native species from the definition of 'natural forest' to be very clear.</p> <p>The FAO definition of natural forest is not useful and we do not recommend its use by the RSPO. This is why the HCSA was developed.</p>
14	Definition	<p>The proposed definition of affected community is unduly limited and limits the applicable scope of FPIC and assessments to only communities immediately within "the affected area". Other communities only "need to be taken into account". This definition needs to be reconsidered.</p>
15	Definition	<p>The definition of new plantings will change according to the membership?</p>
16	Definition	<p>Can you provide more clarity for affected communities? It can be different during the environmental and social</p> <p>The Definition of Affected communities should be limited to those limited by communities impacted directly, that is the community who own the land.</p>
17	Definition	<p>RSPO has included a 'Natural forest' definition, however, if this is to be used going forward it should be socialised as an introductory term along with guidance to better understand its difference from primary forest.</p> <p>Also HCV and HCS are more than forest definitions they are tools to look at the viability of forest and natural ecosystems, and more importantly tools/good practice on managing and monitoring which must be retained. Suggest having an EUDR "add on" standard with natural forest (similar to EU RED), keeping main standard on HCV and HCS. Or clarity on or commitment to guidance clarifying how natural forests should be interpreted (minimum expectations for Nis to build on).</p>
18	Definition	<p>The definition of a permanent worker should not have an established temporality since in Colombia the time of a trial period for a permanent worker can be for one year</p>

No	Criteria/Indicator	Comment (English)
19	Definition	<p>The wording of deforestation definition does not align with with the definitions provided by FAO (EUDR) or AFI definitions. Ensuring consistency with these definitions is crucial for maintaining both accuracy and compliance with International framework and EU regulations.</p> <p>The EUDR uses the following definition of deforestation – ‘The conversion of forest to agricultural use, whether human-induced or not’, in which a forest is defined as ‘Land spanning more than 0,5 hectares with trees higher than 5 meters and a canopy cover of more than 10%, or trees able to reach those thresholds in situ, excluding land that is predominantly under agricultural or urban land use’.</p> <p>AFI Definition of Deforestation : Deforestation: The loss of natural forest as a result of: - conversion to agriculture or other non-forest land use; - conversion to a plantation; or - severe or sustained degradation</p>
20	Definition	For the worker definition, suggest to remove the word piece rate as it is a quantifiable unit to describe payment.
21	Definition	Casual worker defined in Ghana’s labour law may be different from definition of worker.
22	Definition	Definition of worker: 1. In Honduras, the law does not allow the hiring of people by the hour.2. The problem we see is with the interpretation that each auditor may have when reviewing workers' contracts, since in Guatemala and most CA countries there are indefinite and definite term contracts.
23	Definition	Definitions: "Fixed-term workers"... For some countries such as Colombia, a period of 3 months does not apply, for example there are fixed-term contracts of 2 months or less, likewise for the definition of "Permanent Workers" there are permanent workers with a predetermined date as fixed-term contracts.
24	Definition	The definition of outgrower has been deleted

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1	Criteria 1.1	<p>1.1 The 2018 requirement was for adequate information provision to stakeholders 'to allow for effective participation in decision making.' (2018 1.1). This part of the requirement has now been dropped.</p> <p>Moreover SD 2024 1.1.1 now allows UoC to only share the information 'on request'.</p> <p>Solutions: Reinsert deleted requirement and delete option of only making documents available on request</p> <p>LM: This is not necessarily better in the 2018 P&C but I think it worth considering that they should distinguish between the general principle of transparency and the right of affected communities to receive full information as a prerequisite to being able to exercise their right to effectively participate in decision-making and FPIC. I might suggest that this is a second part of the main criteria and is then reiterated throughout. For example, on 1.1.1, it could be added that where the relevant 'stakeholder' is an affected community, the UoC must proactively provide them with all information in requested formats and appropriate languages. The confidential information list might also be a bit broad. On 1.1.2, UoC should be agreeing upon the consultation process with the affected community.</p>
2	Criteria 1.1	Proposed that "based on community needs" be removed because it is difficult to limit the needs of a very diverse community
3	Indicator 1.1.1	Suggest to replace Publicly Available to Requesting Parties
4	Indicator 1.1.1	Might have an issue with the translation of Publicly available or upon request
5	Indicator 1.1.1	<p>Unclear why no longer including: requirement for "adequate forms to allow for effective participation in decision making"</p> <p>Feedback Type: Limitation/Justification</p>
6	Indicator 1.1.1	Languages - Check if the documents to be submitted must be in the local language?
7	Indicator 1.1.1	Propose to revert to the intention of Draft 3 which is clearer for compliance.
8	Indicator 1.1.1	Grower do not like the new structure of the proposed standard and want to rever back to Draft 3 structure
9	Indicator 1.1.1	Propose to revert to the intention of Draft 3 which is clearer for compliance.
10	Indicator 1.1.1	<p>Documents that should be included in the Compliance Requirements must be shared with relevant stakeholders, namely:</p> <ul style="list-style-type: none"> - Relevant financial information if the Unit of Certification experiences a financial crisis that can affect industrial relations, including but not limited to: Termination of Employment; Postponement of payment of wages and Eid Allowances; Discussion of adjustments to living wages; Social security protection. - Company Agreement or Collective Labor Agreement documents must be published. <p>The stakeholders in question are registered labor unions, Bipartite LKS, and the employees concerned.</p>

No	Criteria/Indicator	Comment (English)
11	Indicator 1.1.1	<p>Criteria 1.1.1 which requires companies to only make documentation available 'upon request by stakeholders'. This places serious concerns relating to accessibility of information, transparency, accountability and power imbalances.</p> <p>Further detail: This issue also relates to 2024 Criteria 4.2 - Weakening of the provisions related to existing plantations. Oxfam notes with concern that 2024 Criteria 4.2 contains a significantly watered down text as compared to 2018 Criteria 4.5. This links to concerns outlined below in relation to Criteria 1.1.1..</p> <p>The 2018 Criteria 4.5.2 requires companies to provide all relevant information and documentation, option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. 2018 Criteria 4.5.5 has been deleted. 4.5.5 enables the community to access independent information and advice related to legal, economic, environmental and social implications of the proposed operations on their lands. The deletion of 2018 – 4.5.2 and 4.5.5, coupled with the proposed 2024 Criteria 1.1.1 which requires only companies to make documentation available 'upon request by stakeholders' places serious concerns relating to accessibility of information, transparency, accountability and power imbalances.</p>
12	Indicator 1.1.2	<p>It seems the compliance checklist should refer to FPIC.</p> <p>Feedback type: Implementability/Auditability</p>
13	Indicator 1.1.2	Languages - Documents and management in local language, inclusive.
14	Indicator 1.1.2	<p>Input on 1.1.2 (C), in the Compliance Requirements column, in the implementation section we correct the sentence to: "Implementation of compliance requirements for consultation and communication with relevant stakeholders must be carried out in the appropriate language and format and carried out periodically and on a schedule for refreshment and familiarization"</p> <p>Implementation of the Information Guide is carried out periodically, at least once every 6 months. which includes: -OSH SOP. -Availability of PPE and PPE Replacement Procedures -SOP for complaints and grievances.</p>
15	Indicator 1.1.3	Remove "identified". It does not add any value.
16	Criteria 1.2	Relevant Stakeholders. The word pertinent remains very subjective.
17	Criteria 1.2	Propose that this Indicator be removed because it is already covered in other indicators related to CSR. If it cannot be removed, the indicator can be changed to "The Unit of Certification monitors the contribution made to sustainable community development."
18	Indicator 1.2.1	Suggest methodology
19	Indicator 1.2.1	Translation issue on Ethical Conduct Policy
20	Indicator 1.2.1	Propose to revert to the intention of Draft 3 which is clearer for compliance.
21	Indicator 1.2.1	revert to Draft 3
22	Indicator 1.2.1	Propose to revert to the intention of Draft 3 which is clearer for compliance.

No	Criteria/Indicator	Comment (English)
23	Indicator 1.2.1	To include in Indicator1.2.1 in the compliance requirements column, scope section with the following: Respect for fair business conduct and human rights, including the rights of affected communities and workers. Add another sentence: "Interpretation must include determining relevant national and local laws and regulations related to anti-corruption and respect for human rights, both for affected communities and workers".
24	Indicator 1.2.1	Communicated to whom? Needs to be clarified, its not clear if internal or external. My suggestion is to make a publicly available document.
25	Indicator 1.2.2	The code of ethics policy only contains management's commitment regarding the enforcement of the code of ethics. The processes and procedures of implementation or supervision already exist in the operational system in each company which includes: Procedures, internal audits, Company Regulations, or Joint Work Agreements
26	Indicator 1.2.2	Propose to revert to the intention of Draft 3 which is clearer for compliance. Justification: A policy is a statement of commitment and should not include procedures in it.
27	Indicator 1.2.2	revert to Draft 3
28	Indicator 1.2.2	Propose to revert to the intention of Draft 3 which is clearer for compliance. Justification: A policy is a statement of commitment and should not include procedures in it.
29	Criteria 1.3	It is said that members should use available methodologies to implement HRDD while the RSPO Guidelines are being developed. Is there a recommended methodology considering that there are many versions/methods? If the methodology is not standardized, there will be differences in perception/opinion regarding the implementation of HRDD between the UoC and the Auditor during the audit process.
30	Criteria 1.3	Request to exclude "direct supply chain" and "annually". Request to remove "Until this guidance is developed, endorsed and implemented, members should use available methodologies to conduct HRDD." Request to state that Compliance is inactive until the guidance is developed.
31	Criteria 1.3	There is some guidance available for conducting due diligence, so what is the criteria auditor will use? RSPO should propose its own guidance.
32	Indicator 1.3.1	"Propose to overlay the requirement in HRDD with the other requirements that already there in the standard, so it will make it efficient (SW) Question to IGC from HS: 1) Does the HRDD shall be write as an independent indicator or could it be to incorporated the other relevant indicators? 2) If it serves as an independent indicator, what it should be written in its indicator ?"
33	Indicator 1.3.1	For the RSPO Sec to make sure that the guidance is available before the full implementation of this indicator
34	Indicator 1.3.1	To highlight all indicators in the standard which pertinent to HRDD hence no need HRDD as an independent indicator
35	Indicator 1.3.1	What the meaning of enhance. What should respond the questions from the auditor on question about enhance. Suggest to remove enhance, refer to Draft 3.
36	Indicator 1.3.1	Guidance shall be available prior to the standard applies
37	Indicator 1.3.1	Remove annually to be only once

No	Criteria/Indicator	Comment (English)
38	Indicator 1.3.1	What does direct supply chain mean?
39	Indicator 1.3.1	Propose to move it to 2.4.1
40	Indicator 1.3.1	Indonesia has National Plan on Human Rights Policy regarding HRDD, should be communicated in the slide deck
41	Indicator 1.3.1	Propose RSPO to make a list of indicators that has incorporated HRDD elements in the standards to as a proof that this is align with EUDR. The internal audit process as practised has integrated HRDD elements.
42	Indicator 1.3.1	Propose the list of indicators for HRDD compliance to be visible in the Preamble. This list can be served as a checklist for HRDD compliance.
43	Indicator 1.3.1	Concern regarding auditability of direct supply chain to show compliance on HRDD. Growers do not have decision over the decision made by any agencies/companies that the growers deal with. Propose a guidance how to incorporate these requirements
44	Indicator 1.3.1	Does it apply to scheme SH complying to P&C?
45	Indicator 1.3.1	Does the direct supply chain also apply to independent SH that is part of FFB source to the mill?
46	Indicator 1.3.1	Which guidance should the UoC should follow?
47	Indicator 1.3.1	If the grower is already implementing practices to comply with EUDR, do they need to comply with Indicator 1.3.1?
48	Indicator 1.3.1	Is there criticality assigned to 1.3.1?
49	Indicator 1.3.1	At indicator level, No mention on relevance stakeholders. Propose to add wording 'this shd be done in consultation with relevant stakeholder'.
50	Indicator 1.3.1	Comp. Req - assesment done by competent person. No clarity on who is competent. Competency and ability of relevant person shd be based on methodology included. RSPO may need to come out with training materials for members to comply with training provided to personnel involved.
51	Indicator 1.3.1	For flow of auditability, why not HRDD placed under Principle 2.
52	Indicator 1.3.1	Is there a difference between the HRDD and SEIA? Is this not a duplication?
53	Indicator 1.3.1	want to avoid duplicate job. Summarize the requirement guidance. compilation available method
54	Indicator 1.3.1	Due diligence is not required, it will give the impression of a P&C within the P&C. Due diligence itself has very complex standards.
55	Indicator 1.3.1	For the purpose of making a human rights impact assessment, this is included in the objective of indicator 2.4.1.
56	Indicator 1.3.1	<p>1. HRDD is actually already included in many indicators in the current RSPO P&C, especially those concerning the community (principle 4) and workforce (principle 6). So there is no need for a special HRDD or annual HRDD implementation because there is also an annual RSPO audit that will check the suitability of the implementation of principle 2 and principle 4.</p> <p>2. The application of HRDD to the supply chain is also not easy. It would be better if this was removed from the indicator section</p>
57	Indicator 1.3.1	Status of risks, it is better to indicate a temporality for those identified risks.

No	Criteria/Indicator	Comment (English)
58	Indicator 1.3.1	".....through progressive implementation of Human Rights Due Diligence (HRDD) at the UoC level best practise". suggest to add the wording before the guideline from RSPO is issued to avoid arguement from auditors, as they should accept the best practise by the UoC.
59	Indicator 1.3.1	<p>Propose to remove "direct supply chain" and "annually" as this is too challenging to be implemented on the ground. As HRDD is something new, we propose to remove the action plan which is too detailed and burdensome for growers. Propose to remove "Existing and potential human rights impacts identified through the HRDD shall be addressed through an action plan developed by the UoC. The status of identified risks shall be regularly updated." and replace with "Any identified risks shall be mitigated." We may further strengthen this area in the next P&C review.</p> <p>Suggest to maintain the intention of Draft 3, where compliance of this indicator is inactive until the guidance is developed.</p> <p>Recommend to take a step wise approach on this new subject.</p>
60	Indicator 1.3.1	<ul style="list-style-type: none"> - Grower request to exclude "direct supply chain" and "annually" - Grower respect to HRDD in indicator. However, the indicator to much of detailing. - Grower not comfortable of making Compliance Checklist mandatory - Grower feels Compliance requirement without guidance cannot be made mandatory (2:27) - Grower feels not comfortable with Compliance Requirement and Informative Guidance, suggested to put under Annex as guidance
61	Indicator 1.3.1	<p>Propose to remove "direct supply chain" and "annually" as this is too challenging to be implemented on the ground. As HRDD is something new, we propose to remove the action plan which is too detailed and burdensome for growers. Propose to remove "Existing and potential human rights impacts identified through the HRDD shall be addressed through an action plan developed by the UoC. The status of identified risks shall be regularly updated." and replace with "Any identified risks shall be mitigated." We may further strengthen this area in the next P&C review.</p> <p>Suggest to maintain the intention of Draft 3, where compliance of this indicator is inactive until the guidance is developed.</p> <p>Recommend to take a step wise approach on this new subject.</p>

No	Criteria/Indicator	Comment (English)
62	Indicator 1.3.1	<p>a) RSPO P&C has covered HRDD requirements. The RSPO P&C already contains numerous requirements regarding Human Rights, hence, it should already be in line with the HRDD requirements. For example, Principle 6 contains the requirements related to employment.</p> <p>b) RSPO should provide a gap analysis between RSPO P&C and the market-accepted HRDD requirements. If there are identified gaps, they should be included in the RSPO P&C and there is no need to create separate HRDD requirements in the RSPO P&C which have the potential to be redundant. In this way, the public will understand that RSPO-certified companies comply with HRDD requirements considering that the essence of RSPO P&C is to respect human rights.</p> <p>c) The development of HRDD guidelines for RSPO members is being discussed in the HRWG. IGC requests to add its representatives to HRWG, considering there is only one (1) representative.</p> <p>d) While this guidance is still under development, these provisions cannot yet be applied. Therefore, the procedural note "Until this guidance is developed, endorsed and implemented, members should use available methodologies to conduct HRDD" should be removed.</p> <p>e) HRIA should be conducted only once and not annually, similar to EIA, SIA, and ESIA. "...identify existing and potential business and human rights impacts within its operations and in its direct supply chain annually,"</p> <p>f) All requirements related to HRDD implementation should be defined based on the RSPO Guidance for HRDD that is endorsed by RSPO BoG.</p>
63	Indicator 1.3.1	<p>IGC Feedback The HRDD (1.3) should be moved to 2.4 since the criteria and indicators are related to Human Rights.</p>
64	Indicator 1.3.1	<p>Propose to remove "direct supply chain" and "annually" as this is too challenging to be implemented on the ground. As HRDD is something new, we propose to remove the action plan which is too detailed and burdensome for growers. Propose to remove "Existing and potential human rights impacts identified through the HRDD shall be addressed through an action plan developed by the UoC. The status of identified risks shall be regularly updated." and replace with "Any identified risks shall be mitigated." We may further strengthen this area in the next P&C review.</p> <p>Suggest to maintain the intention of Draft 3, where compliance of this indicator is inactive until the guidance is developed.</p> <p>Recommend to take a step wise approach on this new subject.</p>
65	Indicator 1.3.1	<p>Overall this is a positive change to have a separate requirement to HRDD rather than within the human rights defenders indicator however will need to ensure alignment with global due diligence regulations, (EU CSDD, EU CSRD, German LkSG).</p> <p>The implied scope of HRDD . 1.3.1 says HRDD risks and actions 'within its own operations and in its direct supply chain', the international guidance is very specific in including supply chains (and any wider aspect of a companies' business operations and relationships), but no-where does it imply that this stops at direct suppliers.</p>
66	Indicator 1.3.1	<p>The current text in 1.3.1 focuses only on risk identification and taking action, but it is essential to clarify that HRDD also involves monitoring and reporting, ensuring a comprehensive understanding of the process.</p>

No	Criteria/Indicator	Comment (English)
67	Indicator 1.3.1	This indicator is very vague, especially considering the the HR DD is not ready. Its very difficult to understand what potential bussiness and human rights impacts are. The indicator use the term "progressive implembtation", which is subjective. The requirement to use existing methodlogies while the HRDD is developed is problemtic without further information on requirements for these alternative methodlogies. Overall this indicator is very vague and cannot be audited.
68	Indicator 1.3.1	The identification of human rights impacts must be carried out for the first time and updated every time there are changes in the operation or in the direct supply chain, for this reason the identification should not be established on an annual basis.
69	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>
70	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>
71	Indicator 1.3.1	request to exclude "direct supply chain" and "annually" until this is clearly defined. also to remove from indicator until the guideline is issued
72	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>
73	Indicator 1.3.1	We question of this indicator would not be better placed under 2.4.1, which takes into account the Human Rights Policy
74	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>

No	Criteria/Indicator	Comment (English)
75	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>
76	Indicator 1.3.1	<p>"Currently there is no clear guidance on HRDD so it can cause misunderstandings between CBs. In addition, all indicators in P&C 2024 already cover Human Rights elements including existing regulations so there is no need to duplicate HRDD specific checks and indicators. Therefore, it is proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p>
77	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>
78	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>
79	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>
80	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>

No	Criteria/Indicator	Comment (English)
81	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>
82	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>
83	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>
84	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>
85	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>

No	Criteria/Indicator	Comment (English)
86	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>
87	Indicator 1.3.1	<p>RSPO P&C has covered HRDD requirements. The RSPO P&C already contains numerous requirements regarding Human Rights, hence, it should already be in line with the HRDD requirements. For example, Principle 6 contains the requirements related to employment. While this guidance is still under development, these provisions cannot yet be applied. Therefore, the procedural note "Until this guidance is developed, endorsed, and implemented, members should use available methodologies to conduct HRDD" should be removed.</p>
88	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>
89	Indicator 1.3.1	<p>RSPO Principles and Criteria already cover HRDD requirements. RSPO P&C already contains many requirements related to Human Rights, therefore, it should be in line with HRDD requirements. For example, Principle 6 contains requirements related to labor. In addition, RSPO does not have clear guidance on HRDD which can lead to misinterpretation between CBs</p> <p>Proposed to return to Draft 3, namely "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who raise complaints about its activities."</p>
90	Indicator 1.3.1	<p>Suggest that HRDD should not be implemented until HRDD guidelines covering all human rights elements are published by the RSPO.</p>
91	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>

No	Criteria/Indicator	Comment (English)
92	Indicator 1.3.1	<p>Proposed to revert to Draft 3, which is "The Unit of Certification upholds human rights and is prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about its activities."</p> <p>This is because there is no clear guidance on HRDD which can lead to misinterpretation between CBs. In addition, all indicators in the 2024 P&C already cover Human Rights elements including existing regulations so that there is no need for duplication of checks and specific HRDD indicators.</p>
93	Indicator 1.3.1	<p>There shouldn't be a need to established a specific new criterion just for HRDD. This area has been covered in various existing indicator of RSPO requirement, particularly under Principle 6.</p> <p>This is especially in the absence of the guideline of the said HRDD. Certified growers should already carry out HRDD process throughout the process of their internal audit and management review meetings. These have already been covered in the existing compliance of the RSPO requirement.</p> <p>If there is any new element from the said emerging regulation which have not yet been covered in the RSPO P&C, these new elements need to be identified specifically and can be incorporated in the existing indicator. This newly proposed criteria looks very general therefore it will not be helpful in term of its implementability, and definitely not justifiable enough in term of its auditability.</p>
94	Indicator 1.3.1	<p>Propose Indicators to be "Certification Units uphold human rights and are prohibited from taking retaliatory actions against Human Rights Defenders, Complainants, Reporters and community spokespersons who file complaints about their activities".</p> <p>Disagree with HRDD because in the RSPO P&C Indicators most of them already contain Human Rights requirements including regulations governing human rights referred to, and in the Audit the Human Rights requirements are Verified by a competent RSPO Lead Auditor, So if HRDD is carried out it will duplicate and reduce the qualifications and audits approved by the RSPO System itself. In addition, there is no HRDD Guideline.. it is not clear how to implement it."</p>
95	Indicator 1.3.1	<p>RSPO P&C has covered HRDD requirements. The RSPO P&C already contains numerous requirements regarding Human Rights, hence, it should already be in line with the HRDD requirements. For example, Principle 6 contains the requirements related to employment. While this guidance is still under development, these provisions cannot yet be applied. Therefore, the procedural note "Until this guidance is developed, endorsed, and implemented, members should use available methodologies to conduct HRDD" should be removed. Request to reversion to the intention of Draft 3 A policy is a statement of commitment ,and should not include procedures.</p>

No	Criteria/Indicator	Comment (English)
96	Indicator 1.3.1	<p>In my opinion, HRDD should not be used as a standalone indicator.</p> <p>RSPO should first identify the gaps between EUDR and RSPO P&C requirements concerning HRDD, as important HRDD indicators already exist in the RSPO P&C, such as the Grievance Mechanism, a series of FPIC processes, Gender Committee, Stakeholder Consultation and engagement, etc. By identifying these gaps, RSPO can address any HRDD-related issues not yet covered in the P&C. This approach is crucial to avoid redundant activities that could impact the efficiency and effectiveness of implementing RSPO requirements.</p> <p>Using HRDD as a standalone indicator might give the impression that RSPO has not adequately addressed human rights since the introduction of the first RSPO P&C.</p>
97	Indicator 1.3.1	<p>There is some guidance available for conducting due diligence, so what is the criteria auditor will use? RSPO should propose its own guidance.</p>
98	Indicator 1.3.1	<p>What will the guidance be?</p> <p>When will this guidance be available?</p> <p>Will this guidance go into effect in conjunction with the updated standard?</p>

No	Criteria/Indicator	Comment (English)
1	Criteria 2.1	No longer mentions “ratified international laws” is this intentional? Feedback Type: Other (Please Specify) - Lowering the level of requirement?
2	Criteria 2.1	There are 2 conditions that need to be considered for the Indonesian context in terms of identifying legislation: 1. The large number of legal products and their derivatives. 2. The dynamics of the addition of new legislation in Indonesia. With these conditions, the national interpretation team will have difficulty identifying legislation, including updating it every time there is a change. It is better if this identification is still carried out by the certification unit only in accordance with the RSPO indicators that have regulated it. This comment also applies to other criteria that regulate the responsibility of the national interpretation team in identifying legislation related to these criteria.
3	Criteria 2.1	2.1 The 2018 requirement included ‘and ratified international laws and regulations’ but this has been deleted in SD 2024 2.1. SD 2024 2.1.2 also deletes the requirement ‘This system has a means to track changes to the law’ SD 2024 2.1.3 also deletes the requirement ‘and there is no planting beyond these legal or authorised boundaries.’ Solutions: Reinsert deleted requirements
4	Criteria 2.1	The criteria should be rephrased: The Unit of Certification shall operate in complinace with applicable legal requirements. There is no need to complicate.
5	Criteria 2.1	2.1 The 2018 requirement included ‘and ratified international laws and regulations’ but this has been deleted in SD 2024 2.1.
6	Indicator 2.1.1	Auditability point of view - tax is not auditable
7	Indicator 2.1.1	Auditors might not be able to audit tax requirement and this indicator is not clear on what it means to audit this indicator.
8	Indicator 2.1.1	Under item G how auditor can audit this indicator and more clarity for item H needed.
9	Indicator 2.1.1	Policy in company cna be an evidence that corruption is managed or not allowed.
10	Indicator 2.1.1	Can a technical norm or standard be considered a national regulation?
11	Indicator 2.1.1	Informative Guidance includes “list of international laws and conventions” (which are not mentioned in the criterion) Feedback Type: Implementability/Auditability
12	Indicator 2.1.1	Should the scope have something explicit on protected areas?

No	Criteria/Indicator	Comment (English)
13	Indicator 2.1.1	In the Compliance requirements points G & H, there must be limits for compliance related to anti-corruption/anti-fraud as well as tax requirements
14	Indicator 2.1.1	- Growers request to take out "Anti Corruption and fraud" and "tax, corporate and company requirements" - concern on auditability of these indicators
15	Indicator 2.1.1	I do not know if there is an anti-corruption and fraud law available
16	Indicator 2.1.1	Compliance requirement G 1. There should be some level of clarity on what the Auditor would look out for as well as what the Auditee would provide in order to prove compliance.
17	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
18	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
19	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
20	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
21	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
22	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
23	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
24	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
25	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
26	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
27	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
28	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
29	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
30	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"

No	Criteria/Indicator	Comment (English)
31	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
32	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
33	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
34	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
35	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
36	Indicator 2.1.1	Propose to replace "The Unit of Certification must comply with all applicable national and local laws/regulations" to "The Unit of Certification must comply with all relevant national and local laws/regulations"
37	Indicator 2.1.1	Criteria 2.1 and Indicator 2.1.1: NO COMMENTS FOR RSPO, except to define in item H what they mean by that, and put it in terms and definitions. Define the scope of item H processing plant and plantations. There is very little legislation and not everything applies to processing plants. It is not viable because it is specific that there may be corruption and fraud policies at the UNION level. Code of ethics
38	Indicator 2.1.1	To define what is meant by H) Tax, corporate and business requirements; placed in terms and definitions. Define the scope of literal H processing plant and plantations.
39	Indicator 2.1.2	Streamline the two indicators into one (2.1.2 and 2.2.2)
40	Indicator 2.1.2	The due diligence system in this indicator does not need to be included/deleted, because this system does not have clear limitations in its implementation It will be a dilemma for companies in implementing due diligence for contractors, especially local contractors. For that, clear regulations are needed
41	Indicator 2.1.2	Fulfillment of legal requirements is quite difficult for contractors. This is because generally the contractors used by the Unit of certification are local contractors who have intellectual and working capital limitations. Meanwhile, empowering local contractors is a strategic step to improve the economy of the surrounding community. This should be considered to change the wording of indicator 2.1.2 regarding its fulfillment for contractors. It is proposed to simply see the increase in compliance with the law for contractors gradually according to their capabilities.
42	Indicator 2.1.2	Be more specific to review the definition that actually applies to Due Diligence in the legal field
43	Indicator 2.1.2	- No issues

No	Criteria/Indicator	Comment (English)
44	Indicator 2.1.2	Considering the complexity of its implementation, it is important that due diligence be carried out for those contractors who perform operational and/or labor tasks that provide services using the company's facilities.
45	Indicator 2.1.2	Proposes not to conduct due diligence, but to conduct regulatory compliance evaluations on contractors so that the indicator becomes "A documented system to ensure legal compliance with all applicable national and regional laws/regulations must be developed and implemented. This system must include an evaluation of legal compliance with contractors.
46	Indicator 2.1.2	Proposes not to conduct due diligence, but to conduct regulatory compliance evaluations on contractors so that the indicator becomes "A documented system to ensure legal compliance with all applicable national and regional laws/regulations must be developed and implemented. This system must include an evaluation of legal compliance with contractors.
47	Indicator 2.1.2	Proposes not to conduct due diligence, but to conduct regulatory compliance evaluations on contractors so that the indicator becomes "A documented system to ensure legal compliance with all applicable national and regional laws/regulations must be developed and implemented. This system must include an evaluation of legal compliance with contractors.
48	Indicator 2.1.2	Proposes not to conduct due diligence, but to conduct regulatory compliance evaluations on contractors so that the indicator becomes "A documented system to ensure legal compliance with all applicable national and regional laws/regulations must be developed and implemented. This system must include an evaluation of legal compliance with contractors.
49	Indicator 2.1.2	Proposes not to conduct due diligence, but to conduct regulatory compliance evaluations on contractors so that the indicator becomes "A documented system to ensure legal compliance with all applicable national and regional laws/regulations must be developed and implemented. This system must include an evaluation of legal compliance with contractors.
50	Indicator 2.1.2	Proposes not to conduct due diligence, but to conduct regulatory compliance evaluations on contractors so that the indicator becomes "A documented system to ensure legal compliance with all applicable national and regional laws/regulations must be developed and implemented. This system must include an evaluation of legal compliance with contractors.
51	Indicator 2.1.2	Proposes not to conduct due diligence, but to conduct regulatory compliance evaluations on contractors so that the indicator becomes "A documented system to ensure legal compliance with all applicable national and regional laws/regulations must be developed and implemented. This system must include an evaluation of legal compliance with contractors.
52	Indicator 2.1.2	Proposes not to conduct due diligence, but to conduct regulatory compliance evaluations on contractors so that the indicator becomes "A documented system to ensure legal compliance with all applicable national and regional laws/regulations must be developed and implemented. This system must include an evaluation of legal compliance with contractors.
53	Indicator 2.1.2	Proposes not to conduct due diligence, but to conduct regulatory compliance evaluations on contractors so that the indicator becomes "A documented system to ensure legal compliance with all applicable national and regional laws/regulations must be developed and implemented. This system must include an evaluation of legal compliance with contractors.

No	Criteria/Indicator	Comment (English)
64	Indicator 2.1.2	Proposes not to conduct due diligence, but to conduct regulatory compliance evaluations on contractors so that the indicator becomes "A documented system to ensure legal compliance with all applicable national and regional laws/regulations must be developed and implemented. This system must include an evaluation of legal compliance with contractors.
65	Indicator 2.1.2	Proposes not to conduct due diligence, but to conduct regulatory compliance evaluations on contractors so that the indicator becomes "A documented system to ensure legal compliance with all applicable national and regional laws/regulations must be developed and implemented. This system must include an evaluation of legal compliance with contractors.
66	Indicator 2.1.2	Indicator 2.1.2 'Propose Improvement Indicator' does not conduct due diligence, but conducts regulatory compliance evaluation on contractors so that the indicator becomes: "A documented system to ensure legal compliance with all applicable national and regional laws/regulations shall be developed and implemented. This system shall include evaluation of legal compliance on contractors."
67	Indicator 2.1.2	Proposes not to conduct due diligence, but to conduct regulatory compliance evaluations on contractors so that the indicator becomes "A documented system to ensure legal compliance with all applicable national and regional laws/regulations must be developed and implemented. This system must include an evaluation of legal compliance with contractors.
68	Indicator 2.1.2	SD 2024 2.1.2 also deletes the requirement 'This system has a means to track changes to the law'
69	Indicator 2.1.3	What does it mean that legal land boundaries are kept visible? where? visible to whom?
70	Indicator 2.1.3	Compliance requirement. Should the scope have something explicit on protected areas? Feedback Type: Limitation/Justification
71	Indicator 2.1.3	Suggestion to add: "Evidence of the Unit of Certification's legal status of business operations and legality of land operations shall be available. Legal land boundaries shall be physically demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries."
72	Indicator 2.1.3	- Need more clarity and - the use of word for "physically demarcated" is not practical - The use of "land dispute"
73	Indicator 2.1.3	Business/operating licences are not required in every country. Wording should consider this requirement only where applicable - ask NI to define.
74	Indicator 2.1.3	Need more clarity and - the requirements for "physically demarcated " under normal operations may not be practical .
75	Indicator 2.1.3	SD 2024 2.1.3 also deletes the requirement 'and there is no planting beyond these legal or authorised boundaries.'
76	Indicator 2.1.3	Define commercial licenses and scope. Use "and" instead of "or"

No	Criteria/Indicator	Comment (English)
77	Indicator 2.1.3	<p>Compliance requirements only partially reflect the indicator. The following is missing</p> <p>Implementation</p> <p>F) Legal land boundaries physically demarcated and maintained</p> <p>G) Legal land boundaries checked during planting to confirm compliance</p> <p>Feedback type: Implementability/Auditability</p>
78	Criteria 2.2	The criteria should be rephased: The Unit of Certification shall only engage with contractors that are legally compliant. "legal contractor" is not a good term.
79	Indicator 2.2.1	<p>The compliance checklist seems insufficient to ensure this requirement is met. Unannounced visits, for example, would be a way to ensure evidence of failure to adhere to these criteria has not been hidden.</p> <p>Feedback type: Implementability/Auditability</p>
80	Indicator 2.2.1	Contractors, include some conditions for the exclusion of contractors that are not frequently used.
81	Indicator 2.2.1	<p>Add in 2.2.1 Compliance Requirements Column:</p> <p>Contractors' includes service providers, employment agencies, labor recruiters, suppliers, and security companies that are legal entities.</p>
82	Indicator 2.2.1	Should clarify if this list should include ALL contractors or the contractors that are directly involved in the production of certified products. For example should financial auditors, computer maintenance, printer maintenance companies included on the list? The general practice is to focus on contractors who are directly involved in the production process.
83	Indicator 2.2.2	Relevant to the comment in indicator 2.1.2, a clause will be included in the work contract with the contractor that the contractor must fulfill and demonstrate compliance with the laws and regulations, but in fulfilling it, it is sufficient to see the increase in compliance with the laws for the contractor in stages according to his ability
84	Indicator 2.2.2	Suggestion to add: "This must be demonstrated by a third party."
85	Indicator 2.2.3	"...and the collection of recruitment fees (and related costs) from workers by the contractor." The last sentence of this indicator does not need to be included in the contract, because this implementation already exists in other indicators.
86	Indicator 2.3.1	This indicator have always been very difficult to audit
87	Indicator 2.3.1	From the EUDR perspective, how will this indicator be implemented to meet the EUDR requirements?
88	Indicator 2.3.1	What is meant by RFF legality?
89	Indicator 2.3.1	Indicator 2.3.1 and 2.3.2. Unit of Certification have the same level of difficulty in obtaining legal documents from both types of suppliers (direct and indirect suppliers). Many of these suppliers refuse to provide access to their legal documents due to confidentiality/security concerns. What makes it even more difficult is that the same thing is not requested by other PKS located around the location of the UoC that does not implement RSPO, so this is a factor in itself making it difficult to compete at the local level.

No	Criteria/Indicator	Comment (English)
90	Indicator 2.3.1	Geo-location requirements of polygon should be added to bring it in line with the EUDR for plots above 4 hectares; Use of geolocator as described in EUDR Article 2 Paragraph 28: "geolocation' means the geographical location of a plot of land described by means of latitude and longitude coordinates corresponding to at least one latitude and one longitude point and using at least six decimal digits; for plots of land of more than four hectares used for the production of the relevant commodities other than cattle, this shall be provided using polygons with sufficient latitude and longitude points to describe the perimeter of each plot of land"
91	Indicator 2.3.1	Proposed that there is no need to include the process of obtaining geolocation documentation of the origin of FFB, due to privacy concerns (Suppliers are reluctant to share legal documents)
92	Indicator 2.3.1	Proposed that there is no need to include the process of obtaining geolocation documentation of the origin of FFB, due to privacy concerns (Suppliers are reluctant to share legal documents)
93	Indicator 2.3.1	Proposed that there is no need to include the process of obtaining geolocation documentation of the origin of FFB, due to privacy concerns (Suppliers are reluctant to share legal documents)
94	Indicator 2.3.1	Proposed that there is no need to include the process of obtaining geolocation documentation of the origin of FFB, due to privacy concerns (Suppliers are reluctant to share legal documents)
95	Indicator 2.3.1	Proposed that there is no need to include the process of obtaining geolocation documentation of the origin of FFB, due to privacy concerns (Suppliers are reluctant to share legal documents)
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97	Indicator 2.3.1	Proposed that there is no need to include the process of obtaining geolocation documentation of the origin of FFB, due to privacy concerns (Suppliers are reluctant to share legal documents)
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99	Indicator 2.3.1	Proposed that there is no need to include the process of obtaining geolocation documentation of the origin of FFB, due to privacy concerns (Suppliers are reluctant to share legal documents)
100	Indicator 2.3.1	Indicator 2.3.1 and 2.3.2 both has similar difficulty for obtaining legal document. Both direct and indirect suppliers are reluctant to share their legal document for privacy issue. The certification/licensing mechanism for intermediates will be challenging. Given that RSPO membership is voluntary, RSPO should not pressure intermediates to obtain certification.
101	Indicator 2.3.1	Proposed that there is no need to include the process of obtaining geolocation documentation of the origin of FFB, due to privacy concerns (Suppliers are reluctant to share legal documents)
102	Indicator 2.3.1	Proposed that there is no need to include the process of obtaining geolocation documentation of the origin of FFB, due to privacy concerns (Suppliers are reluctant to share legal documents)
103	Indicator 2.3.1	Proposed that there is no need to include the process of obtaining geolocation documentation of the origin of FFB, due to privacy concerns (Suppliers are reluctant to share legal documents)
104	Indicator 2.3.1	Proposed that there is no need to include the process of obtaining geolocation documentation of the origin of FFB, due to privacy concerns (Suppliers are reluctant to share legal documents)

No	Criteria/Indicator	Comment (English)
105	Indicator 2.3.1	Indicator 2.3.1 and 2.3.2 both has similar difficulty for obtaining legal document. Both direct and indirect suppliers are reluctant to share their legal document for privacy issue. The certification/licensing mechanism for intermediates will be challenging. Given that RSPO membership is voluntary, RSPO should not pressure intermediates to obtain certification.
106	Indicator 2.3.1	Indicator 2.3.1 and 2.3.2: During the implementation of these indicators, obtaining legal documents from direct and indirect suppliers has proven challenging due to trust issues from the suppliers and concerns about potential misuse of the documents. Given these difficulties, it is proposed that this indicator be reclassified from a major to a minor indicator. This adjustment could help address the practical challenges encountered and ensure a more effective and realistic implementation of the RSPO P&C.
107	Indicator 2.3.2	To change the "due diligence of such suppliers" with "engagement with the suppliers"
108	Indicator 2.3.2	On Interim measure for 2.3.2 can the interim measure be applicable to those that were not previously aware of it and would like to start applying for it now.
109	Indicator 2.3.2	Asked for clarification whether point B is mandatory, mentioned that it is difficult to implement 2.3.2 (B),
110	Indicator 2.3.2	The interim measure is unclear. It is still confusing on how to audit this as the interim measure is not written into the indicator.
111	Indicator 2.3.2	The term 'Due Diligence' is confusing. The 2018 version was clearer in spelling out all of the exact requirement.
112	Indicator 2.3.2	This is challenging because there are middle man (FFB Traders) involved and they will not provide the documentation necessary for the compliance of this indicator as it is a business secret.
113	Indicator 2.3.2	due diligence vs engagement. How to expect engagement
114	Indicator 2.3.2	Engagement would be a better word on this indicator. Not all the required documents from the supply base is easy to receive
115	Indicator 2.3.2	For indirect suppliers, due diligence is not necessary if in the end they have to provide the same documents as direct suppliers. It is better to just identify the fulfillment program (in obtaining land legality documents).
116	Indicator 2.3.2	Due diligence of indirect suppliers must be reviewed, considering the difficulty of obtaining legality for indirect suppliers, most of whom are smallholders.
117	Indicator 2.3.2	What is the relevance between the certification/licensing mechanism for intermediaries and the fulfillment of indicator 2.3.2 for indirect suppliers? To what extent is certification/licensing carried out for intermediaries? Does this mean making intermediaries RSPO certified units?
118	Indicator 2.3.2	Narrowing the definition of due diligence to be more specific. The scope must be clearer.
119	Indicator 2.3.2	FFB origins should include geolocalisation
120	Indicator 2.3.2	- Growers to confirm the word "geo-location" in Draft 2 and Draft 3 - Growers feels that indicator will affected the P5 - Growers asked to look at the original intent of the indicator

No	Criteria/Indicator	Comment (English)
121	Indicator 2.3.2	Suggest that the RSPO specify the key elements required in this new indicator for due diligence of FFB suppliers to ensure clarity on the compliance requirements.
122	Indicator 2.3.2	<p>The greatest challenge is that the number of independent FFB suppliers, either supplying directly to the company or through the FFB aggregators, keep changing on a daily basis due to factors such as</p> <ol style="list-style-type: none"> 1. FFB price competitiveness by the mills which compels Farmers to swing to other mills to sell their FFB when the price favours them, therefore are not loyal affiliates to any mill. 2. because the numerus artisanal mills are not strict with documentation, the slightest insistence for farmers to provide some of these documents becomes a disincentive for them to move to the artisanal mills. 3. In Ghana for example, Stringent procedures one has to go through to acquire land documents discourages most farmers from acquiring it. 4. Some suppliers do not own oil palm plantations, they grow other food crops such as cassava, plantain etc. few palm trees happen to have grown on their farms by chance and for economic reasons, they harvest and sell when those palms are ripe. 5. Most lands for oil palm plantations in Ghana belong to families and communities (Stool Lands). Therefore, disputes over rights to the stool or family lands often result in the absence of the substantive head of the land holding authority who would exercise fiduciary rights over the land. In such instances, it becomes difficult to undertake land transactions as there is always a problem with who is the rightful person to authorize such land transactions.
123	Indicator 2.3.2	<ul style="list-style-type: none"> - Since Indirect suppliers are dynamic, it is proposed that there is no need to include "Supplier Due Diligence", - It is necessary to explain what documents cover the legality of FFB. <p>Proposed changes "For all FFB obtained from indirect sources, the mill in the Unit of Certification must have information on the origin and legality of FFB."</p>
124	Indicator 2.3.2	<p>Indicators 2.3.1 and 2.3.2 both have similar difficulties in obtaining legal documents. Both direct and indirect suppliers are reluctant to share their legal documents due to privacy concerns.</p> <p>Certification/licensing mechanisms for intermediaries will be a challenge. Given that RSPO membership is voluntary, RSPO should not pressure intermediaries to obtain certification.</p>
125	Indicator 2.3.2	<p>Indicators 2.3.1 and 2.3.2 both have similar difficulties in obtaining legal documents. Both direct and indirect suppliers are reluctant to share their legal documents due to privacy concerns.</p> <p>Certification/licensing mechanisms for intermediaries will be a challenge. Given that RSPO membership is voluntary, RSPO should not pressure intermediaries to obtain certification.</p>
126	Indicator 2.3.2	<p>Indicators 2.3.1 and 2.3.2 both have similar difficulties in obtaining legal documents. Both direct and indirect suppliers are reluctant to share their legal documents due to privacy concerns.</p> <p>Certification/licensing mechanisms for intermediaries will be a challenge. Given that RSPO membership is voluntary, RSPO should not pressure intermediaries to obtain certification.</p>

No	Criteria/Indicator	Comment (English)
127	Indicator 2.3.2	<p>Indicators 2.3.1 and 2.3.2 both have similar difficulties in obtaining legal documents. Both direct and indirect suppliers are reluctant to share their legal documents due to privacy concerns.</p> <p>Certification/licensing mechanisms for intermediaries will be a challenge. Given that RSPO membership is voluntary, RSPO should not pressure intermediaries to obtain certification.</p>
128	Indicator 2.3.2	<p>Indicators 2.3.1 and 2.3.2 both have similar difficulties in obtaining legal documents. Both direct and indirect suppliers are reluctant to share their legal documents due to privacy concerns.</p> <p>Certification/licensing mechanisms for intermediaries will be a challenge. Given that RSPO membership is voluntary, RSPO should not pressure intermediaries to obtain certification.</p>
129	Indicator 2.3.2	<p>Indicators 2.3.1 and 2.3.2 both have similar difficulties in obtaining legal documents. Both direct and indirect suppliers are reluctant to share their legal documents due to privacy concerns.</p> <p>Certification/licensing mechanisms for intermediaries will be a challenge. Given that RSPO membership is voluntary, RSPO should not pressure intermediaries to obtain certification.</p>
130	Indicator 2.3.2	<p>Indicators 2.3.1 and 2.3.2 both have similar difficulties in obtaining legal documents. Both direct and indirect suppliers are reluctant to share their legal documents due to privacy concerns.</p> <p>Certification/licensing mechanisms for intermediaries will be a challenge. Given that RSPO membership is voluntary, RSPO should not pressure intermediaries to obtain certification.</p>
131	Indicator 2.3.2	<p>Indicators 2.3.1 and 2.3.2 both have similar difficulties in obtaining legal documents. Both direct and indirect suppliers are reluctant to share their legal documents due to privacy concerns.</p> <p>Certification/licensing mechanisms for intermediaries will be a challenge. Given that RSPO membership is voluntary, RSPO should not pressure intermediaries to obtain certification.</p>
132	Indicator 2.3.2	<p>Indicators 2.3.1 and 2.3.2 both have similar difficulties in obtaining legal documents. Both direct and indirect suppliers are reluctant to share their legal documents due to privacy concerns.</p> <p>Certification/licensing mechanisms for intermediaries will be a challenge. Given that RSPO membership is voluntary, RSPO should not pressure intermediaries to obtain certification.</p>
133	Indicator 2.3.2	<p>Indicators 2.3.1 and 2.3.2 both have similar difficulties in obtaining legal documents. Both direct and indirect suppliers are reluctant to share their legal documents due to privacy concerns.</p> <p>Certification/licensing mechanisms for intermediaries will be a challenge. Given that RSPO membership is voluntary, RSPO should not pressure intermediaries to obtain certification.</p>
134	Indicator 2.3.2	<p>Indicators 2.3.1 and 2.3.2 both have similar difficulties in obtaining legal documents. Both direct and indirect suppliers are reluctant to share their legal documents due to privacy concerns.</p> <p>Certification/licensing mechanisms for intermediaries will be a challenge. Given that RSPO membership is voluntary, RSPO should not pressure intermediaries to obtain certification.</p>

No	Criteria/Indicator	Comment (English)
135	Indicator 2.3.2	<p>Indicators 2.3.1 and 2.3.2 both have similar difficulties in obtaining legal documents. Both direct and indirect suppliers are reluctant to share their legal documents due to privacy concerns.</p> <p>Certification/licensing mechanisms for intermediaries will be a challenge. Given that RSPO membership is voluntary, RSPO should not pressure intermediaries to obtain certification.</p>
136	Indicator 2.3.2	<p>Indicators 2.3.1 and 2.3.2 both have similar difficulties in obtaining legal documents. Both direct and indirect suppliers are reluctant to share their legal documents due to privacy concerns.</p> <p>Certification/licensing mechanisms for intermediaries will be a challenge. Given that RSPO membership is voluntary, RSPO should not pressure intermediaries to obtain certification.</p>
137	Criteria 2.4	<p>SD 2024 2.4 deletes the reference to Human Rights Defenders which was previously explicit in 2018 4.1 for which SD 2024 2.4 is meant to substitute.</p> <p>SD 2024 2.4.1 also omits the prohibition in 2018 4.1.2 on ‘the use of mercenaries and paramilitaries in their operations.’</p> <p>Solutions: Reinsert deleted requirements</p>
138	Criteria 2.4	<p>SD 2024 2.4 deletes the reference to Human Rights Defenders which was previously explicit in 2018 4.1 for which SD 2024 2.4 is meant to substitute.</p>
139	Indicator 2.4.1	<p>Indicator missing scope mentioned in the criterion (workers): Suggest adding "against WORKERS and other affected stakeholders"</p> <p>Feedback type: Implementability/Auditability</p>
140	Indicator 2.4.1	<p>Compliance requirements only partially reflect the indicator. The following is missing</p> <ul style="list-style-type: none"> • the UoC and all its sub-contractors implement the HHRR Policy. • There are no negative actions by the UoC or its contractors against workers and affected stakeholders <p>Feedback type: Implementability/Auditability</p>
141	Indicator 2.4.1	<p>Compliance checklist wording for last bullet could be clearer; instead of:</p> <p>“Applicability and implementation of the Policy to the UoC’s contractors, in particular security service companies.”</p> <p>use: - Applicability and implementation of the Policy BY the UoC’s contractors, in particular security service companies</p> <p>Feedback type: Implementability/Auditability</p>
142	Indicator 2.4.1	<p>Some companies may have the clause on the prohibition of negative actions in a separate policy e.g. Policy on Human Rights Defender. Propose that the RSPO revise the wording of this clause to include the consideration of other relevant policy that stipulates the prohibition of any negative actions by the UoC against affected stakeholders.</p>

No	Criteria/Indicator	Comment (English)
143	Indicator 2.4.1	Replace "socialise" with "communicate". The indicator cannot be implemented as it is written, There is no palm oil company in the world that has zero impact. So the requirement to include a prohibition of any negative impacts is not only impossible but its not anchored in the social impact management: identify, mitigate, manage.
144	Indicator 2.4.1	In order to avoid duplication, Indicators 2.4.1 and 1.3.1 need to be simplified because they discuss matters related to Human Rights Policy. It is proposed that the two indicators be combined.
145	Indicator 2.4.1	In order to avoid duplication, Indicators 2.4.1 and 1.3.1 need to be simplified because they discuss matters related to Human Rights Policy. It is proposed that the two indicators be combined.
146	Indicator 2.4.1	In order to avoid duplication, Indicators 2.4.1 and 1.3.1 need to be simplified because they discuss matters related to Human Rights Policy. It is proposed that the two indicators be combined.
147	Indicator 2.4.1	In order to avoid duplication, Indicators 2.4.1 and 1.3.1 need to be simplified because they discuss matters related to Human Rights Policy. It is proposed that the two indicators be combined.
148	Indicator 2.4.1	In order to avoid duplication, Indicators 2.4.1 and 1.3.1 need to be simplified because they discuss matters related to Human Rights Policy. It is proposed that the two indicators be combined.
149	Indicator 2.4.1	In order to avoid duplication, Indicators 2.4.1 and 1.3.1 need to be simplified because they discuss matters related to Human Rights Policy. It is proposed that the two indicators be combined.
150	Indicator 2.4.1	In order to avoid duplication, Indicators 2.4.1 and 1.3.1 need to be simplified because they discuss matters related to Human Rights Policy. It is proposed that the two indicators be combined.
151	Indicator 2.4.1	In order to avoid duplication, Indicators 2.4.1 and 1.3.1 need to be simplified because they discuss matters related to Human Rights Policy. It is proposed that the two indicators be combined.
152	Indicator 2.4.1	In order to avoid duplication, Indicators 2.4.1 and 1.3.1 need to be simplified because they discuss matters related to Human Rights Policy. It is proposed that the two indicators be combined.
153	Indicator 2.4.1	In order to avoid duplication, Indicators 2.4.1 and 1.3.1 need to be simplified because they discuss matters related to Human Rights Policy. It is proposed that the two indicators be combined.
154	Indicator 2.4.1	In order to avoid duplication, Indicators 2.4.1 and 1.3.1 need to be simplified because they discuss matters related to Human Rights Policy. It is proposed that the two indicators be combined.
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156	Indicator 2.4.1	In order to avoid duplication, Indicators 2.4.1 and 1.3.1 need to be simplified because they discuss matters related to Human Rights Policy. It is proposed that the two indicators be combined.
157	Indicator 2.4.1	SD 2024 2.4.1 also omits the prohibition in 2018 4.1.2 on 'the use of mercenaries and paramilitaries in their operations.'
158	Criteria 2.5	SD 2024 2.5 (with 2.5.1 and 2.5.2) is meant to substitute for both 2018 4.2 and 2018 6.5.4. In the process SD 2024 2.5 weakens 2018 4.2 which requires that 'There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.' It also weakens 6.5.4 which requires a grievance mechanism, which 'respects anonymity and protects complainants where requested'. SD 2024 2.5, 2.5.1. and 2.5.2 omits the requirement in 2018 4.2.4 that 'The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.'

No	Criteria/Indicator	Comment (English)
159	Criteria 2.5	SD 2024 2.5 (with 2.5.1 and 2.5.2) is meant to substitute for both 2018 4.2 and 2018 6.5.4. In the process SD 2024 2.5 weakens 2018 4.2 which requires that 'There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.' It also weakens 6.5.4 which requires a grievance mechanism, which 'respects anonymity and protects complainants where requested'. SD 2024 2.5, 2.5.1. and 2.5.2 omits the requirement in 2018 4.2.4 that 'The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.' Solutions: Reinsert deleted requirements
160	Criteria 2.5	The criteria contains requirements that should be in the indicators. The criteria should read: The Unit of Certification shall develop and implement a system to resolve grievances. Everything else should be in the indicators.
161	Criteria 2.5	SD 2024 2.5 (with 2.5.1 and 2.5.2) is meant to substitute for both 2018 4.2 and 2018 6.5.4. In the process SD 2024 2.5 weakens 2018 4.2 which requires that 'There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.' It also weakens 6.5.4 which requires a grievance mechanism, which 'respects anonymity and protects complainants where requested'.
162	Indicator 2.5.1	There is a conflict resolution in P4 (Sect respond: because it refers to land issues only). Why this system did not match here ie a whole internal grievance system in P2.
163	Indicator 2.5.1	Might need to give more clarification for the term internal grievance mechanism as it may create confusion that it is only for internal stakeholders to raise grievance
164	Indicator 2.5.1	Compliance checklist is missing: - evidence the system has been developed in consultation with relevant stakeholder Feedback type: Implementability/Auditability
165	Indicator 2.5.1	Generraly OK, not entirely clear what "acesible" means.
166	Indicator 2.5.1	We require clarity on the wording of 'internal Grievance System'. To our understanding we talk about a system that needs to be implemented internally. However, this could be misunderstood as a system that is only applicable internally (for employees - not for communities).
167	Indicator 2.5.1	the grievance mechanism should be gender-sensitive
168	Indicator 2.5.1	Grievance mechanism should be gender-sensitive
169	Indicator 2.5.1	SD 2024 2.5, 2.5.1. and 2.5.2 omits the requirement in 2018 4.2.4 that 'The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.'
170	Indicator 2.5.2	Compliance Requirement missing: - implementation requirements related to enabling access to illiterate stakeholders or vulnerable groups Feedback type: Implementability/Auditability

No	Criteria/Indicator	Comment (English)
171	Indicator 2.5.2	Compliance checklist: content missing Feedback type: Implementability/Auditability
172	Indicator 2.5.2	Unify it into a single paragraph, for better understanding
173	Indicator 2.5.2	Suggestion to add: "The Unit of Certification shall monitor and demonstrate the effectiveness of such Grievance Mechanism through social research by an independent third party body."
174	Indicator 2.5.2	replace "socialisation" with communication. The part on assistance could be problematic. What sort of assistance exactly? Can stakeholder demand the CH to hire lawyers, commission independent studies etc? The current requirement open the possibility of stakeholders to request all sort of unjustified support.
175	Indicator 2.5.3	Complaint status should be given if the complainant requires/requests it, or according to the procedures that apply.
176	Indicator 2.5.3	These two indicators are redundant. Indicator 2.5.3 is already covered in indicator 2.5.4.
177	Indicator 2.5.3	A change to the phrase "shall be kept up to date" is proposed
178	Indicator 2.5.3	<ul style="list-style-type: none"> • "resolves disputes in an effective manner" is missing now. The evaluation of effectiveness of the grievance mechanism is still not covered by this indicator. The evaluation of the effectiveness is very important to promote better management of the grievance mechanism and hence minimise the risk of grievance turning into complaint. • The grievance mechanism system should also follow the "Effectiveness Criteria of the UN Guiding Principles on Business and Human Rights": https://www.ohchr.org/sites/default/files/Documents/Issues/Business/Intro_Guiding_PrinciplesBusinessHR.pdf <p>The rationale of this suggestion is also to be more aligned with the existing global principles so that we can enhance the use of common language on the effectiveness of the grievance system, and also express a more explicit goal to create and implement an 'effective' grievance system.</p> <p>Suggest to add one indicator : "The effectiveness of grievance mechanism shall be evaluated in consultation with stakeholders every three years. The evaluations shall be documented."</p>
179	Indicator 2.5.3	To add in 2.5.3 (C), in the Compliance Requirements column an additional scope, which is: Complaint records/documentation must include: F) Information related to the recorded complaint is available to the public
180	Indicator 2.5.3	Suggest to remove the "identical" word. In the next audit, the UoC may conduct audits in different months due to the operational schedule; thus, the data may not be "identical 12 months" for each audit.
181	Indicator 2.5.4	The proposal does not require a review of the progress of the complaint status, change to "The Unit of Certification must monitor the progress, status, and results/resolution of all complaint cases".
182	Indicator 2.5.4	The proposal does not require a review of the progress of the complaint status, change to "The Unit of Certification must monitor the progress, status, and results/resolution of all complaint cases".

No	Criteria/Indicator	Comment (English)
1	Criteria 3.1	From the grower's perspective this P&C is implementable. However the scheme smallholders should be involved to an extent in the business management plan of the UoC. This ensures that for audit purposes, the auditors can confirm that the scheme smallholders were included.
2	Criteria 3.1	Why not just call this "viability" as there is no viability without environmental and social viability either. Feedback type: Technical
3	Criteria 3.1	There is a divergence between the Spanish text and the English text in relation to the period of time over which the plan is to be applied, as one establishes a minimum of 3 years and the other a long term. It is fine to establish 3 years, and revised every year.
4	Criteria 3.1	OK, this type of indicator has zero impact. It only clogs up the RSPO auditing.
5	Indicator 3.1.1	Add assessment of risks and dependencies to the compliance checklist, as otherwise what is economic viability based on? Many businesses need to do this now to meet EU ESRD requirements under the CSRD. Feedback type: Technical
6	Indicator 3.1.1	-no issues
7	Indicator 3.1.2	Please note that the replanting plan applies only to those crops that, due to the age of the crop, require a replanting plan, since there are relatively new plantations that still need many years to carry out their first replanting.
8	Indicator 3.1.3	Indicators like this have zero impact and should be removed.
9	Indicator 3.2.1	The reframe has provided more clarity compared to the existing 2018 P&C
10	Indicator 3.2.1	-no issues
11	Indicator 3.2.1	Objection to the informative guidance where UoCs are asked to engage by distributing relevant information on Good Agricultural Practices (GAP) or Best Management Practices (BMPs).
12	Indicator 3.2.1	Objection to the informative guidance where UoCs are asked to engage by distributing relevant information on Good Agricultural Practices (GAP) or Best Management Practices (BMPs).
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19	Indicator 3.2.1	Objection to the informative guidance where UoCs are asked to engage by distributing relevant information on Good Agricultural Practices (GAP) or Best Management Practices (BMPs).
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24	Indicator 3.2.1	Objection to the informative guidance where UoCs are asked to engage by distributing relevant information on Good Agricultural Practices (GAP) or Best Management Practices (BMPs).
25	Indicator 3.2.2	The Previous P&C was vague but the proposed change added much needed clarity to what "mechanism" entails thus ensuring SOPs are implemented
26	Indicator 3.2.2	-no issues
27	Criteria 3.3	Add dependencies Feedback type: Technical
28	Criteria 3.3	The text of the criteria should be simplified.
29	Criteria 3.3	Including Smallholders: If there are small stakeholders in the supply base, it must be ensured that they are included and an internal control system must be implemented.
30	Indicator 3.3.1	Add dependencies Feedback type: Technical
31	Indicator 3.3.1	Compliance requirement goes beyond the scope of the indicator, which is about independent assessment of impacts (not about the plan to prevent them, etc). It would be better to move the text in the last phrase to 3.3.3 compliance requirement (E10) Feedback type: Implementability/Auditability
32	Indicator 3.3.1	New Planting Procedure placed under "informative guidance" while supposed to be normative (Appendix 3) As a Reference, this is minimal and may not be sufficient to ensure sustainability, so how can it meet RSPO requirements for sustainability Feedback type: Procedural
33	Indicator 3.3.1	2 concerns : define independently assessed and examples of new operations need guidelines as in the estates and mill small projects like new housing area, conversion from nursery to palm, etc are common and should these projects be subjected to SEIA and independently - should it apply for small projects

No	Criteria/Indicator	Comment (English)
34	Indicator 3.3.2	<p>It seems this indicator overlaps with indicator 3.3.1 as both concern conducting SEIA. Shouldn't there be just one indicator? Procedures to comply with indicators in different scenarios (such as NPP for new plantings) will still exist and be verified for compliance as applicable</p> <p>Feedback type: Procedural</p>
35	Indicator 3.3.2	<p>This "Reference" is supposed to be just for "Informative Guidance" yet it is phrased as requirement ("shall"). If this is required, it should be part of the Compliance Requirements.</p> <p>Note this requirement implies SEIA must be conducted after all other assessments (LTUS, HCV, soil, welfare, GHG, etc) have been completed</p> <p>Feedback type: Implementability/Auditability</p>
36	Indicator 3.3.2	3.3.2. Review translation. "Todas las EISA"
37	Indicator 3.3.2	<p>In 3.3.2 (C), in the Informative Guide related to SEIA References, to add another impacts:</p> <p>"M) Additional SEIA subtopics Risk assessment of labor standard violations referring to decent work criteria, including freedom of association, social security, social dialogue, fulfillment of K3, and workers' rights."</p>
38	Indicator 3.3.2	Remove "For the Unit of certification as a whole".
39	Indicator 3.3.3	<p>This is the indicator where it would make more sense to "integrate" measures to protect and enhance HCVs, HCS, natural forest, primary forest, RTE, peat, riparians and any other environmental feature mentioned as required to be protected across the standard (instead of mentioning it at the compliance requirement level, without reflecting the indicator, in 3.3.1).</p> <p>The wording "in a participatory way" is vague. It would be best to state explicitly: "with participation of affected communities and relevant stakeholders.</p> <p>Updates every 2 years may be too frequent.</p> <p>Feedback type: Implementability/Auditability</p>

No	Criteria/Indicator	Comment (English)
40	Indicator 3.3.3	<p>Compliance requirements: "Scope" is missing entirely, and it is critical for clarity.</p> <p>The scope can be defined using some of the content included for the guidance in 3.3.1 (following from NPP requirements), and some from 7.12.4 in the 2018 P&C:</p> <p>The integrated Management Plan(s) must cover the UoC and include any relevant wider landscape level considerations (where these are identified); the IMP must include measures to protect, enhance and uphold:</p> <p>A) areas with High Conservation Values (HCV) and High Carbon Stock (HCS); B) Peatland, fragile and marginal soils; and C) The rights of local peoples including their rights on the land being developed.</p> <p>"Implementation" (as does the indicator) is also missing a requirement on how this plan is developed. The following (from 2018 P&C) would be relevant:</p> <p>The integrated management plan is developed in consultation with relevant stakeholders</p> <p>Feedback type: Implementability/Auditability</p>
41	Indicator 3.3.3	The preparation of an integrated management plan is not necessary, this is because each part already has its own plan. It is enough to ensure that environmental and social management is implemented, not by compiling / combining plans and reports.
42	Indicator 3.3.3	These two indicators are redundant. Indicator 3.3.4 is already covered in indicator 3.3.3. It is better to delete indicator 3.3.4
43	Indicator 3.3.3	3.3.3 We agree with the EISA update every 2 years, if a guideline is established to define whether it can be updated with internal resources.
44	Indicator 3.3.4	<p>Compliance requirements: the scope of the Action Plans "shall include requirements of other indicators", and for management of HCV and HCS areas, peatlands, and other conservation areas includes as reference the Criteria 7.3, 7.4, 7.7.</p> <p>Yet, none of this criterion include compliance requirements for the protection and enhancement of HCVs and HCS. (7.7.3 refers to another indicator, which does not exist).</p> <p>Also...why not refer to 7.7.8? On conflict human-wildlife.</p> <p>Implementation Entirely missing, so the second part of the indicator "Action plans [...] are implemented and show continuous improvement" has no compliance requirements</p> <p>Feedback type: Implementability/Auditability</p>
45	Indicator 3.3.4	Interlink to Comment in Indicator 3.3.3
46	Indicator 3.3.4	Criticality must be considered, since evidence of continuous improvement in some indicators will not always be possible (annual)

No	Criteria/Indicator	Comment (English)
47	Indicator 3.3.4	OK, but suggest to remove "Per its Intergrated Management Plans"
48	Criteria 3.4	The text of the criteria is gramatically not correct, it used "managed" which is past tense. Perhaps "shall manage land responsibly and adopts..." is better.
49	Indicator 3.4.1	Regular estimates of FFB Yields Goal is to achieve tracing of production volume This also provides a basis for RSPO to verify data by the auditors.
50	Indicator 3.4.1	3.4.1. Define periodicity. One-year projection procedure with periodic six-monthly reviews. Documentation is a challenge.
51	Indicator 3.4.1	Suggest to change: 3.4.1 Good Agricultural Practices, relevant to the Unit of Certification, to manage soil fertility to optimise yield and minimise environmental impacts shall be documented, implemented, and monitored. 3.4.2 Soil fertility and plant health shall be monitored and managed by the Unit of Certification for optimum growth and development, through conducting annual leaf or tissue analysis and soil sampling at least every 5-years and/or before replanting, to evaluate the fertility status. 3.4.3 A nutrient recycling plan for the Unit of Certification shall be developed and implemented. The nutrient recycling plan shall includes the recycling of biomass (i.e., Empty Fruit Bunches (EFB)), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.
52	Indicator 3.4.1	-no issues
53	Indicator 3.4.2	see 3.4.1
54	Indicator 3.4.3	The word Balance between Productivity and Social and Environmental Impacts is a subjective evaluation, it is difficult to audit or evidence compliance.
55	Indicator 3.4.3	The indicator text repeats the objective of the criterion (why: to manage soil fertility and plant nutrient levels) It can go in the guide.
56	Indicator 3.4.3	see 3.4.3.
57	Indicator 3.5.10	For the mills which adopt the IP supply chain model, it is not clear whether they are still IP if they receive FFB from independent farmers where the farmers have sold their credits or whether they are still MS 1 and 2. There should be special guidance regarding this matter.
58	Indicator 3.5.3	Procedural Note: Guidelines to be published to certify what is and what is not good farming practice With a basic guide, available in all relevant languages, and effective local relays, to ensure messages are disseminated and understood.

No	Criteria/Indicator	Comment (English)
59	Indicator 3.5.3	Procedural Note: Guidelines to be published to certify what is and what is not good farming practice With a basic guide, available in all relevant languages, and effective local relays, to ensure messages are disseminated and understood.
60	Indicator 3.5.5	What does it mean in terms of implementation for UOC to "monitor the level of FFB sourcing"

No	Criteria/Indicator	Comment (English)
1	Principle 4	<p>We share the concerns raised by several SNGOs during this consultation, on the removal of the requirement for FPIC in existing plantations from Principle 4. This would constitute a serious weakening of the Standard compared to the 2018 P&C and would be in contradiction with international human rights laws, as explained in the statements from the SNGO members circulated during the consultation. This would not only undermine the RSPO's credibility, but directly weaken its ability to meet its own aims regarding the upholding of human rights. We strongly urge that the requirement for FPIC in existing plantations is re-instated into the P&C.</p> <p>Feedback type: Limitation/Justification</p> <p>Notes: Major concern - weakening of the P&C</p>
2	Criteria 4.1	<p>The concept of FPIC should be confined to new plantings where Free, Informed and Consent concept for existing plantations should be tackled under effective grievance mechanism in a participatory manner. It is very tough to apply FPIC retrospectively as it may open up a can of worms to re-engage the communities on the issues which have been mutually agreed in the past 10-20 years or even more.</p>
3	Criteria 4.1	<p>There is a massive weakening of the standard with respect to Free, Prior and Informed Consent. 2018 4.4 requires that 'Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.' Detailed requirements are set out in 2018 4.4.1, 4.4.2, 4.4.3, 4.4.4, 4.4.5 and 4.4.6. Stronger FPIC provisions are set out for New Plantings in 2018 4.5.</p> <p>"Instead SD 2024 4.1.1, 4.1.2 and 4.1.3 propose deleting the requirement for FPIC for 'existing plantations' (distinguished between those before 2007 and those established after 2007) and instead only require evidence of Social and Environmental Impact Assessments with a corresponding management plan, and – for after 2007 – proof of legal agreements for use of customary lands, land tenure studies and participatory mapping.</p> <p>Proof of legal agreements for use of customary lands is insufficient as many governments have not formally recognised customary lands, this is why evidence of the FPIC from the communities is the required indicator.</p> <p>Solutions: Restore the requirement for FPIC to 4.1 and corresponding indicators</p>

No	Criteria/Indicator	Comment (English)
4	Criteria 4.1	<p>2024 Criteria 4.1 .1 to 4.1.2 - Major issue regarding the removal of the FPIC requirement for existing plantations (2018 Criteria 4.4.1 to 4.4.3)</p> <p>2018 Indicators under Criteria 4.4.1 included a specific FPIC requirement that the “use of the land for oil palm does not diminish the legal, customary or user rights of other users without their Free, Prior and Informed Consent”. The indicators detailed the manner it should be conducted:</p> <ul style="list-style-type: none"> a) Documentary evidence of land ownership or authorised use of customary land through a FPIC process; b) Evidence of carrying out an FPIC process including a plan developed through consultation with communities, evidence of respecting community's decisions to give or withhold their consent to the operations and evidence that legal, economic, environmental and social implications of the operations of the land have been understood by the communities; c) Maps showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties. <p>However, the 2024 Criteria 4.1 of the revised draft has completely removed the requirement of FPIC from existing plantations. Further, the division of existing plantations under two categories based on the date on which they were established (before and after November 2007) and have imposing different requirements for each category is highly contentious.</p> <p>2024 Criteria 4.1.1 relates to existing plantations established before November 2007 and limits them to provide evidence only of social and environmental impact assessments and corresponding management plans. Criteria 4.1.2 which relates to existing plantations established after November 2007 also limits evidence of social and environmental impact assessments but includes additional documentary evidence related to the company’s legal ownership or use of the land, history of land tenure, list of current stakeholders and participatory mapping with affected communities showing the extent of rights.</p> <p>Oxfam notes with concern that the 2024 Criteria 4.1 significantly falls short of the protections offered to the communities under the FPIC process. It completely removes the FPIC process and limits to a social and environmental impact assessments. We reiterate the importance of an FPIC process in obtaining lands for plantations without affecting the rights of communities and causing conflicts. We highlight the fact that there is a fundamental difference between an FPIC process and a social and environment impact assessment followed by a management plan. The latter cannot be a substitute for an FPIC process.</p>

No	Criteria/Indicator	Comment (English)
5	Criteria 4.1	<p>We highlight below, the protections offered by a FPIC process.</p> <p>A)FPIC is a right under international human rights law. RSPO must align its policies with international human rights law. The right of Indigenous peoples to FPIC is specifically enshrined in international law.</p> <p>Indigenous peoples enjoy distinct rights under international human rights law – in particular the ILO’s Indigenous and Tribal Peoples Convention No. 169 (1989), and the UN Declaration on the Rights of Indigenous Peoples (UNDRIP, 2007).</p> <p>The right of Indigenous peoples to FPIC is enshrined in international law through their right to self-determination. This includes ILO 169 and UNDRIP, as well as other legal instruments. UNDRIP article 32(2) emphasizes the need for states to consult with Indigenous peoples and seek their ‘free and informed consent prior to the approval of any project affecting their lands or territories and other resources’.</p> <p>FPIC is also a principle of best practice for other affected communities and linked to the realisation of diverse human rights.</p> <p>FPIC applies to activities that have an impact on the land, territories or natural resources of Indigenous peoples and local communities. It does not require that their commonly recognized rights to use, own or control decisions about land have been formally registered, demarcated or recognized by the state.</p> <p>B)FPIC is an iterative process that runs throughout the lifecycle of a project. Imposition of a time limitation that excludes the FPIC requirement from existing projects is arbitrary.</p> <p>Free, Prior and Informed Consent (FPIC) has three dimensions: as a right under international law, as a best practice principle, and as an iterative process involving staged steps throughout the life of the project/operation. To realise FPIC, Indigenous peoples and local communities must be adequately informed about projects or company activities in a timely manner and must be given the opportunity to approve or reject the project or activities before operations begin, through an appropriate process of community decision making that is free from coercion and intimidation. This includes participation in setting terms and conditions that address the economic, social and environmental impacts of all stages of a project or company operation.</p> <p>An FPIC process involves obtaining community consent for activities to go ahead before any authorization of future activities. This requires that initial consultation processes to determine if the community consents (or not) are undertaken before projects or operations are approved. Investors and governments must respect local decision- making processes and timelines for decision making. The FPIC process continues throughout the lifecycle of the project or company operation.</p> <p>Removing the FPIC requirement for existing projects cannot be justified in view of the fact that FPIC is a process that runs throughout the lifecycle of a project from its commencement to its conclusion. Such removal creates a loophole for companies to bypass the FPIC process and opens up space for grave human rights violations and land grabbing.</p>

No	Criteria/Indicator	Comment (English)
6	Criteria 4.1	<p>Oxfam urges RSPO to view these proposed changes in the broader context and with special attention to the realities on the ground. We draw RSPO's attention to the following example from Brasil.</p> <p>Example from Brasil: Agropalma and the Balsa Community</p> <p>The population that today lives in the Balsa Community is made up of quilombolas who used to live on the banks of the Acará River. Since the 1980s, about 180 quilombola families have been expelled from the riverbank after the arrival of Agropalma in the region. With nowhere to go, many of them now live on the banks of the PA-256 highway. It is estimated that 82 quilombola families live today in the community of Balsa.</p> <p>Since 2015, the conflict has intensified and Agropalma have prohibited quilombolas from accessing the river and other important places, such as the Livramento Cemetery, which has existed for at least 180 years. "My grandmother is planted under a palm tree," said one of the quilombolas interviewed by Oxfam Brasil in 2021.</p> <p>There are four cemeteries in the lands grabbed by Agropalma, three are from quilombolas and one from Indigenous Peoples from the Temb� people. According to a study developed by the Nucleus of High Amazonian Studies from Federal University of Par�, they found evidence that the occupation of the area by quilombolas is from the late 19th century and early 20th century.</p> <p>The Land Institute of Par� State (Iterpa) carried out a technical survey of the quilombola territory, and then prepared an assessment indicating 18,203 hectares being quilombola land. Today, 71.8% of this area is under the control of Agropalma. Process No. 2016/330821 has been stalled at Iterpa since 2015, due to political influence. Paradoxically, Iterpa today claims that because it does not currently find quilombolas living in the area, even though they are living close by because they were expelled, and thus won't proceed with the recognition of the land.</p> <p>The state prosecutors from Par� (MPPA) have filed a lawsuit in 2020 (Public Civil Action – A�o Civil P�blica) requesting the declaration of nullity and cancellation of real estate registrations related to the Porto Alto Farm (areas currently called AGROPAR, CRAI I, CRAI II and AGROPALMA). Besides Agropalma, other defendants in this lawsuit are Iterpa and IBD Certifications, which has done the RSPO certification for the company. At the same law suit they also ask for a court mandated cancelling of Agropalma's RSPO certification. Agropalma also has a Fair Trade certification.</p> <p>Agropalma is the largest palm oil producer in Latin America, and it is a supplier to companies such as Nestl�, Coca-Cola, PepsiCo, Mars, General Mills, ADM, Cargill, Bunge, Mondelez, NaturaCo. It has more than five thousand employees and thousands of hectares of land in Brazil.</p> <p>Quilombolas are Constitutionally protected in Brazil regarding the preservation of their culture and land rights. In Brazil, the ILO 169 Convention applies to Indigenous peoples and Quilombolas. The influence of agribusiness in Brasil is very powerful and goes as far as advocating to change the Constitution by abolishing the provisions on 'historical land rights' and recognizing only the rights of peoples who were occupying the land on a certain date, which would make all the land grabs of the last decades legal.</p>

No	Criteria/Indicator	Comment (English)
7	Criteria 4.1	<p>Criteria 4.1, Criteria 4.2 and Criteria 4.4</p> <p>PROCESS CONCERNS</p> <p>Affected communities and civil society are left with a highly contentious and incomplete 2024 P&C text that is weaker than the 2018 draft and that will need substantial reworking before it can be considered ready for submission to the membership for endorsement.</p> <p>Oxfam shares the following concerns about an unsatisfactory process:</p> <ul style="list-style-type: none"> • Oxfam has major concerns regarding the “unsatisfactory process” for the P&C revision process, which has led to a weakening of the 2018 RSPO Principles and Criteria (P&Cs), including the removal of the FPIC Requirement for Existing Plantations, the weakening of the provisions related to existing plantations, and, the removal of provisions related to compensation for loss. • We see the process as a “major issue”. • Our concerns our outlined in the email of concern Oxfam signed onto that was sent by Forrest People's Programme to members of the Board of Governors on 9/7/24 and then again on 19/8/2024. We state our concern that the Secretariat has circulated this draft for public consultation: <ul style="list-style-type: none"> o BEFORE it has been circulated, discussed or agreed by the Standards Standing Committee, which we consider necessary given the contested nature of the text; o Contrary to the Board’s instruction to the Secretariat that the P&C should not be weakened; o Without the most contentious changes being first discussed with the relevant Working Groups (Human Rights Working Group and Biodiversity and HCV Working Group), and; o Contrary to the explicit instruction of the P&C Revision Steering Group that the Secretariat should consult with Expert Groups to discuss these contentious issues. <p>On the day of submission (19/08/2024) sNGOs including Oxfam submitted a joint email of concern to the RSPO Standards Standing Committee and P&C Steering Group about the deficiencies with the current process of revising the RSPO Principles and Criteria and to propose adjustments to the process as follows:</p> <ol style="list-style-type: none"> 1. sNGOs including Oxfam call for the current schedule for the revision and adoption of the P&Cs to be revised. 2. The Secretariat should process all the comments received on the current document and develop a consolidated text that shows all the objections to and suggestions to improve the consultation draft. 3. Expert groups and/or the relevant Working Groups should then review these texts and make proposals for an improved version. 4. Once it seems a consensus is achievable then the multi-stakeholder group should be reconvened.

No	Criteria/Indicator	Comment (English)
8	Criteria 4.1	<p>Further Harm to RSPO's Reputation</p> <ul style="list-style-type: none"> • In Oxfam's view, the premature distribution of this draft is causing further harm to RSPO's reputation. Necessary civil society experts and groups were not consulted in the above process. It can be perceived that RSPO is therefore acting in the interests of growers who have the most to gain from the weakening of the P&Cs, for example, in relation to dropping FPIC for existing plantations. • "Dropping the FPIC requirement for 'existing plantations' risks making RSPO certified sustainable palm oil less marketable in the EU" - 9/7/24 FFP Memorandum to RSPO, pg 7. • Oxfam also finds further process elements unsatisfactory. Namely, the submission process has been unclear. The timing of consultations held over the European summer is also problematic, given many of the most active civil society members to RSPO –are taking holidays at this time and therefore had insufficient preparation time to build a comprehensive submission. <p>Oxfam shares the following requests for immediate action for strengthening process in future. These are necessary for RSPO to action as a respected multi-stakeholder initiative that strives to uphold and advance social and environmental sustainability in the palm oil sector:</p> <ol style="list-style-type: none"> 1. RSPO must protect the voice and needs of civil society and rightsholders within its own governance and processes. RSPO must be conscious of and deliberately protect the voice of civil society and rightsholders within all of its RSPO processes. This is a root cause for why the 2018 P&Cs have been weakened, given the balance of representation and therefore power is currently with the growers. Civil society does not have the resources that growers do. We call for RSPO to re-think its multi-stakeholder values. Above consensus-making it is your duty to "level the playing field" by ensuring a fair power balance within RSPO processes and decision making. 2. RSPO secretariat should refrain from being content/technical givers and instead focus on being a process and discussion facilitator. The value of RSPO from the NGO perspective is bringing in the relevant expert groups, representatives and Working Groups to review these texts and make proposals for improved versions.

No	Criteria/Indicator	Comment (English)
9	Criteria 4.1	<p>2024 Criteria 4.1 .1 to 4.1.2 - Removal of the FPIC Requirement for Existing Plantations (2018 Criteria 4.4.1 to 4.4.3)</p> <p>2018 Indicators under Criteria 4.4.1 included a specific FPIC requirement that the “use of the land for oil palm does not diminish the legal, customary or user rights of other users without their Free, Prior and Informed Consent”. The indicators detailed the manner it should be carried out:</p> <ol style="list-style-type: none"> 1. Documentary evidence of land ownership or authorised use of customary land through a FPIC process 2. Evidence of carrying out an FPIC process including a plan developed through consultation with communities, evidence of respecting community's decisions to give or withhold their consent to the operations and evidence that legal, economic, environmental and social implications of the operations of the land have been understood by the communities 3. Maps showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties. <p>However, the 2024 Criteria 4.1 of the has completely removed the requirement of FPIC from existing plantations. Further, the division of existing plantations under two categories based on the date on which they were established (before and after November 2007) and have imposing different requirements for each category is highly contentious.</p> <p>2024 Criteria 4.1.1 relates to existing plantations established before November 2007 and limits them to provide evidence only of social and environmental impact assessments and corresponding management plans. Criteria 4.1.2 which relates to existing plantations established after November 2007 also limits evidence of social and environmental impact assessments but includes additional documentary evidence related to the company's legal ownership or use of the land, history of land tenure, list of current stakeholders and participatory mapping with affected communities showing the extent of rights.</p> <p>We note with concern that the 2024 Criteria 4.1 significantly falls short of the protections offered to the communities under the FPIC process. It completely removes the FPIC process and limits to a social and environmental impact assessments. We reiterate the importance of an FPIC process to in obtaining lands for plantations without affecting the rights of communities and causing conflicts. We highlight the fact that there is a fundamental difference between an FPIC process and a social and environment impact assessment followed by a management plan. The latter cannot be a substitute for an FPIC process.</p>
10	Criteria 4.1	Criteria 4.1 and Indicator 4.1.3: Clarify what is required, what should be made publicly known. Define relevant stakeholders.
11	Indicator 4.1.1	this indicator already requires an identiifed of relevant stakeholders. What is the diff with 4.1.2 if it is to change to relevant stakeholders
12	Indicator 4.1.1	Who owns the legal right in FPIC and who owns the user right in FPIC.
13	Indicator 4.1.1	In Côte d'Ivoire, When you conduct SIA, EIA, and SEIA, it means you will also need to acquire the documentation regarding legal ownership. So there is no difference between 4.1.1 and 4.1.2 .
14	Indicator 4.1.1	The french translation seems to suggest that only need to produce 1 document from 4.1.1
15	Indicator 4.1.1	Agree only if 3.3.3 is ratified.
16	Indicator 4.1.1	There needs to be guidance on Social Impact assemsment methodology
17	Indicator 4.1.1	There needs to be a consistent methodology in order to identify the direct and inderect area of influence.
18	Indicator 4.1.1	We need a methodology of how to do a social impact assessment.

No	Criteria/Indicator	Comment (English)
19	Indicator 4.1.1	It is not easy to apply the indicator in communication issues, absence of public policies, migration issues, objectivity is lost.
20	Indicator 4.1.1	Focus the consultation on the identification of the effects that the operations occur in the area
21	Indicator 4.1.1	<p>For existing plantations and/or developments established after November 2007, the Unit of Certification shall provide evidence of the following:</p> <p>A) Social Impact Assessment (SIA), Environmental Impact Assessment (EIA), or Social and Environmental Impact Assessment (SEIA), and its Management Plan; B) Documents showing the Unit of Certification's legal ownership or lease, or authorised use of customary land given by customary landowners; C) History of land tenure and the actual legal or customary use of the land; D) List of current stakeholders; and E) Participatory mapping with affected communities showing the extent of rights.</p> <p>Proposal:</p> <p>a) RSPO P&C should not apply retroactively. If an existing plantation has been declared COMPLIANT with the previous RSPO P&C through a certification mechanism then this is PERMANENTLY valid and should not be declared as non-compliant if the next RSPO P&C becomes more severe, giving rise to potential non-compliance. b) FPIC requirements in the RSPO P&C to be consistent. The FPIC requirements should remain unchanged and continue to adhere to the RSPO P&C 2018, which is deemed sufficient and has been effectively implemented thus far. c) The cut-off date of FPIC implementation should refer to the date of release of FPIC Guide 2015. d) The inclusion of participatory mapping which will be very controversial and difficult to implement. According to the FPIC guide, the affected communities (ACs) at the PM should be defined as the ACs at the new planting stage. Conducting PM with the current ACs (at the existing plantation) is controversial. However, the plantation has obtained HGU (Land Use Rights) from the government, which the company and ACs must protect and respect together. In the other scenario, such as a take-over company, the PM implementation by the new owner is very difficult. e) (C) History of land tenure and the actual legal or customary use of the land; this document should be part of the land legality process as mentioned in point (B).</p>
22	Indicator 4.1.1	Include in the Compliance Requirement: Stakeholder mapping must be identified in detail, especially vulnerable groups such as women, people with disabilities, indigenous peoples, children (all groups have conventions at the UN).
23	Indicator 4.1.1	<p>Propose cut-off date before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015, so that it becomes "For plantations and/or developments established before November 2015, the Unit of Certification must provide evidence of:</p> <p>A) Social Impact Assessment (SIA); B) Environmental Impact Assessment (EIA); or C) Social and Environmental Impact Assessment (SEIA) and related Management Plan."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the Unit of Certification has been audited based on this provision.</p>

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24	Indicator 4.1.1	<p>Propose cut-off date before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015, so that it becomes "For plantations and/or developments established before November 2015, the Unit of Certification must provide evidence of: A) Social Impact Assessment (SIA); B) Environmental Impact Assessment (EIA); or C) Social and Environmental Impact Assessment (SEIA) and related Management Plan."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the Unit pf Certification has been audited based on this provision.</p>
25	Indicator 4.1.1	<p>Propose cut-off date before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015, so that it becomes "For plantations and/or developments established before November 2015, the Unit of Certification must provide evidence of: A) Social Impact Assessment (SIA); B) Environmental Impact Assessment (EIA); or C) Social and Environmental Impact Assessment (SEIA) and related Management Plan."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the Unit pf Certification has been audited based on this provision.</p>
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27	Indicator 4.1.1	<p>Propose cut-off date before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015, so that it becomes "For plantations and/or developments established before November 2015, the Unit of Certification must provide evidence of: A) Social Impact Assessment (SIA); B) Environmental Impact Assessment (EIA); or C) Social and Environmental Impact Assessment (SEIA) and related Management Plan."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the Unit pf Certification has been audited based on this provision.</p>

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28	Indicator 4.1.1	<p>Propose cut-off date before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015, so that it becomes "For plantations and/or developments established before November 2015, the Unit of Certification must provide evidence of: A) Social Impact Assessment (SIA); B) Environmental Impact Assessment (EIA); or C) Social and Environmental Impact Assessment (SEIA) and related Management Plan."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the Unit pf Certification has been audited based on this provision.</p>
29	Indicator 4.1.1	<p>For plantations and/or developments established before November 2007, the Unit of Certification must provide evidence of: A) Social Impact Assessment (SIA); B) Environmental Impact Assessment (EIA); or C) Social and Environmental Impact Assessment (SEIA) and associated Management Plan.</p>
30	Indicator 4.1.1	<p>Propose cut-off date before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015, so that it becomes "For plantations and/or developments established before November 2015, the Unit of Certification must provide evidence of: A) Social Impact Assessment (SIA); B) Environmental Impact Assessment (EIA); or C) Social and Environmental Impact Assessment (SEIA) and related Management Plan."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the Unit pf Certification has been audited based on this provision.</p>
31	Indicator 4.1.1	<p>Propose cut-off date before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015, so that it becomes "For plantations and/or developments established before November 2015, the Unit of Certification must provide evidence of: A) Social Impact Assessment (SIA); B) Environmental Impact Assessment (EIA); or C) Social and Environmental Impact Assessment (SEIA) and related Management Plan."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the Unit pf Certification has been audited based on this provision.</p>
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33	Indicator 4.1.1	<p>Propose cut-off date before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015, so that it becomes "For plantations and/or developments established before November 2015, the Unit of Certification must provide evidence of: A) Social Impact Assessment (SIA); B) Environmental Impact Assessment (EIA); or C) Social and Environmental Impact Assessment (SEIA) and related Management Plan."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the Unit pf Certification has been audited based on this provision.</p>
34	Indicator 4.1.1	<p>Propose cut-off date before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015, so that it becomes "For plantations and/or developments established before November 2015, the Unit of Certification must provide evidence of: A) Social Impact Assessment (SIA); B) Environmental Impact Assessment (EIA); or C) Social and Environmental Impact Assessment (SEIA) and related Management Plan."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the Unit pf Certification has been audited based on this provision.</p>
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36	Indicator 4.1.1	<p>Propose cut-off date before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015, so that it becomes "For plantations and/or developments established before November 2015, the Unit of Certification must provide evidence of: A) Social Impact Assessment (SIA); B) Environmental Impact Assessment (EIA); or C) Social and Environmental Impact Assessment (SEIA) and related Management Plan."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the Unit pf Certification has been audited based on this provision.</p>

No	Criteria/Indicator	Comment (English)
37	Indicator 4.1.1	<p>Propose cut-off date before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015, so that it becomes "For plantations and/or developments established before November 2015, the Unit of Certification must provide evidence of: A) Social Impact Assessment (SIA); B) Environmental Impact Assessment (EIA); or C) Social and Environmental Impact Assessment (SEIA) and related Management Plan."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the Unit of Certification has been audited based on this provision.</p>
38	Indicator 4.1.1	<p>4.1.1</p> <p>Propose Improvement of Indicator with Cut Off Date before November 2007 replaced with Before November 2015 in accordance with the implementation of Revised FPIC Guidelines of RSPO HRWG Nov 2015 to become "For plantations and/or developments established before November 2015, the Unit of Certification must provide evidence of: A) Social Impact Assessment (SIA); B) Environmental Impact Assessment (AMDAL); or C) Social and Environmental Impact Assessment (SEIA) and related Management Plan."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the Unit of certification has been audited based on this provision.</p>
39	Indicator 4.1.1	<p>Indicator 4.1.1 and 4.5.3: "Propose that this Indicator be deleted as it is already covered in other CSR related indicators. If it cannot be deleted then the indicator can be changed to "The Unit of Certification monitors the contribution made to sustainable community development."</p>
40	Indicator 4.1.1	<p>Propose cut-off date before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015, so that it becomes "For plantations and/or developments established before November 2015, the Unit of Certification must provide evidence of: A) Social Impact Assessment (SIA); B) Environmental Impact Assessment (EIA); or C) Social and Environmental Impact Assessment (SEIA) and related Management Plan."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the Unit of Certification has been audited based on this provision.</p>
41	Indicator 4.1.1	<p>Why in this indicator and 4.1.2 is it SIA and EIA; OR SEIA and management and monitoring plan? 2018 P&C was SEIA AND monitoring plan. Does two separate assessments negate need for monitoring plan? Should not do but wording suggests it</p> <p>Feedback type: Text/Wordsmithing</p>
42	Criteria 4.5	<p>The framing of this suggests an overall problem with the respecting of local rights, so consider intent.</p> <p>Feedback type: Text/Wordsmithing</p>
43	Criteria 4.5	<p>Criteria 4.5 and Indicator 4.5.2: The identified needs of communities are included, according to the company's capabilities, to the extent that the company can infer them through a plan. Contribution to community needs, in mutual agreement with the company.</p>

No	Criteria/Indicator	Comment (English)
44	Indicator 4.1.2	Follow the stated in the excel not in slide (no 78) For the cut off date, IGC suggest to remove the cut off date and follow the draft 3. (SW)
45	Indicator 4.1.2	Need to give more clarity on what is participatory mapping. From IGC, it should be a mapping that conducted collaboratively between the UoC and the communities (SW)
46	Indicator 4.1.2	To remove participatory mapping for the existing plantation (SW)
47	Indicator 4.1.2	Remove cut off date Nov 2007 and remove participatoy mapping
48	Indicator 4.1.2	Refer back to 2018
49	Indicator 4.1.2	How can we make consent received and documented auditable? A lot of the findings, if any on this indicator are not audited or found not available in the audit findings. The SIA requirements are always done at the bare minimum, the recommendation provided does not cover significant details/ concerns.
50	Indicator 4.1.2	The current proposal on the cut-off date (2007) from the Secretariat is clear for auditing propose and easy to implement.
51	Indicator 4.1.2	Is there any FPIC guidance to verify information on the SIA report? There are cases where the listed stakeholders are not around anymore to verify information
52	Indicator 4.1.2	FPIC applies to both new and existing plantings. There should be a distinction between both planting on how the FPIC verification/ assessment is conducted so there won't be any dispute on the process.
53	Indicator 4.1.2	Lesson learned from implementation of FPIC among grower should be taken into account in revising FPIC
54	Indicator 4.1.2	There is no guidance on participatory mapping for the revised standard. The latest FPIC guindace could be outdated.
55	Indicator 4.1.2	Why the cut of date is November 2007 for existing plantation not FPIC 2020
56	Indicator 4.1.2	Why is the cut of date of November 2005 changed to November 2007? Will LUCA and NPP also change to 2007 as well?
57	Indicator 4.1.2	Are there any guidance for when they want to acquire the land from previous owner such as on the previous land user rights and how they can comply to this indicator?
58	Indicator 4.1.2	There is a host community, which is also included in the affected community. The land belong to the host community/project community, they have user rights and have lended or provided their land to the plantation. How will they be treated?
59	Indicator 4.1.2	item D, suggest to replace list of stakeholders to actual/relevant stakeholders. Definition of stakeholders refers to generic, while in in 4.1.2 is referring to stakeholders relevnat to the land issues.
60	Indicator 4.1.2	No need to repeat the requirement in 4.1.1 , just say "in addition to the requirement of 4.1.1, and then list down the additional requirements in 4.1.2. It is better to separate to 2007 and after 2007.
61	Indicator 4.1.2	Participatory mapping for existing plantation would not be feasible
62	Indicator 4.1.2	Mapping the boundary physically for existing plantation is feasible in the FPIC process
63	Indicator 4.1.2	How to safeguard the UoC if the land ownership is being contested after being transferred over to new owner in the FPIC process for existing plantation
64	Indicator 4.1.2	Implementation for provision of data point C) land tenure history and point E) participatory mapping will be with cut off date Nov 2007, 2007 is a long time to provide these documents. If this participatory mapping refers to FPIC procedure then it will be very difficult to apply for the old plantation. Cut off date Nov 2007 to be deleted updated. This requirement should apply to new plantations.

No	Criteria/Indicator	Comment (English)
65	Indicator 4.1.2	This indicator should return to the RSPO P&C 2018 and especially the RSPO national interpretation (Indonesia) in 2020 which accommodates the difficulties of plantations that have been operating for a long time and have not kept FPIC evidence documents in the past. So November 2015 was used as the cut off date (in accordance with the issuance of the FPIC guideline). The application of indicator 4.1.2 will have implications for UoCs that have so far complied with the RSPO P&C 2018 to not comply with the latest P&C
66	Indicator 4.1.2	Participatory mapping would be a huge challenge for the growers as participatory mapping is a complex process involving various neighbouring communities. Propose to change to physical demarcation of legal boundaries.
67	Indicator 4.1.2	- check the language
68	Indicator 4.1.2	Participatory mapping would be a huge challenge for the growers as participatory mapping is a complex process involving various neighbouring communities. Propose to change to physical demarcation of legal boundaries.
69	Indicator 4.1.2	Evidence to be provided by existing plantations after 2007 should include SAI and EIA, or a combined SEIA (eliminate the option of providing only one of the three).
70	Indicator 4.1.2	"There are two inputs in criteria 4.1.2, namely: * In the Informative Guide column, the Scope section should add information regarding Land Rights for affected communities in locations that have certain special characteristics such as customary law, special autonomy, and are prone to conflict. The data collection process must be very strong (do not deploy law enforcement officers during socialization, education, etc.) * In the Compliance Checklist column, recommend to add: In the list of rights holders, information related to the status of land rights must be presented, both individually, communally, and at the Ulayat (customary) level."
71	Indicator 4.1.2	Propose Cut Off Date Before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015 so that it becomes "For plantations and/or developments established after November 2015, the Certification Unit must provide evidence as follows: A) Social Impact Assessment (SIA), Environmental Impact Assessment (EIA), or Social and Environmental Impact Assessment (SEIA), and its Management Plan; B) Documents showing the legal ownership or lease of the Certification Unit, or legal use of customary land granted by the customary landowner; C) History of land ownership and legal or customary land use; D) List of current stakeholders; and E) Participatory mapping with affected communities showing the extent of their rights." Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the certification unit has been audited based on this provision.

No	Criteria/Indicator	Comment (English)
72	Indicator 4.1.2	<p>Propose Cut Off Date Before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015 so that it becomes "For plantations and/or developments established after November 2015, the Certification Unit must provide evidence as follows:</p> <ul style="list-style-type: none"> A) Social Impact Assessment (SIA), Environmental Impact Assessment (EIA), or Social and Environmental Impact Assessment (SEIA), and its Management Plan; B) Documents showing the legal ownership or lease of the Certification Unit, or legal use of customary land granted by the customary landowner; C) History of land ownership and legal or customary land use; D) List of current stakeholders; and E) Participatory mapping with affected communities showing the extent of their rights." <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the certification unit has been audited based on this provision.</p>
73	Indicator 4.1.2	<p>Propose Cut Off Date Before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015 so that it becomes "For plantations and/or developments established after November 2015, the Certification Unit must provide evidence as follows:</p> <ul style="list-style-type: none"> A) Social Impact Assessment (SIA), Environmental Impact Assessment (EIA), or Social and Environmental Impact Assessment (SEIA), and its Management Plan; B) Documents showing the legal ownership or lease of the Certification Unit, or legal use of customary land granted by the customary landowner; C) History of land ownership and legal or customary land use; D) List of current stakeholders; and E) Participatory mapping with affected communities showing the extent of their rights." <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the certification unit has been audited based on this provision.</p>
74	Indicator 4.1.2	<p>Propose Cut Off Date Before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015 so that it becomes "For plantations and/or developments established after November 2015, the Certification Unit must provide evidence as follows:</p> <ul style="list-style-type: none"> A) Social Impact Assessment (SIA), Environmental Impact Assessment (EIA), or Social and Environmental Impact Assessment (SEIA), and its Management Plan; B) Documents showing the legal ownership or lease of the Certification Unit, or legal use of customary land granted by the customary landowner; C) History of land ownership and legal or customary land use; D) List of current stakeholders; and E) Participatory mapping with affected communities showing the extent of their rights." <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the certification unit has been audited based on this provision.</p>

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76	Indicator 4.1.2	<p>Propose Cut Off Date Before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015 so that it becomes "For plantations and/or developments established after November 2015, the Certification Unit must provide evidence as follows:</p> <p>A) Social Impact Assessment (SIA), Environmental Impact Assessment (EIA), or Social and Environmental Impact Assessment (SEIA), and its Management Plan;</p> <p>B) Documents showing the legal ownership or lease of the Certification Unit, or legal use of customary land granted by the customary landowner;</p> <p>C) History of land ownership and legal or customary land use;</p> <p>D) List of current stakeholders; and</p> <p>E) Participatory mapping with affected communities showing the extent of their rights."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the certification unit has been audited based on this provision.</p>
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80	Indicator 4.1.2	<p>Propose Cut Off Date Before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015 so that it becomes "For plantations and/or developments established after November 2015, the Certification Unit must provide evidence as follows:</p> <ul style="list-style-type: none"> A) Social Impact Assessment (SIA), Environmental Impact Assessment (EIA), or Social and Environmental Impact Assessment (SEIA), and its Management Plan; B) Documents showing the legal ownership or lease of the Certification Unit, or legal use of customary land granted by the customary landowner; C) History of land ownership and legal or customary land use; D) List of current stakeholders; and E) Participatory mapping with affected communities showing the extent of their rights." <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the certification unit has been audited based on this provision.</p>

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81	Indicator 4.1.2	<p>Indicator 4.1.2. Request to remove the indicator 4.1.2.</p> <p>For existing plantations and/or developments established after November 2007, the Unit of Certification shall comply with the prevailing FPIC requirements as outlined in the RSPO Principles & Criteria (P&C) from 2007, 2013, 2018, and subsequent versions.</p> <p>RSPO P&C should not apply retroactively. Conducting participatory mapping with the current affected community at the existing plantation will be very controversial and difficult to implement. In the other scenario, such as a take-over company, the PM implementation by the new owner is very difficult.</p> <p>The RSPO/HRWG released the first FPIC Guide, developed through a multistakeholder consultative approach, in 2015. Therefore, this release date should be used as the cut-off for FPIC implementation.</p>
82	Indicator 4.1.2	<p>Propose Cut Off Date Before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015 so that it becomes "For plantations and/or developments established after November 2015, the Certification Unit must provide evidence as follows:</p> <ul style="list-style-type: none"> A) Social Impact Assessment (SIA), Environmental Impact Assessment (EIA), or Social and Environmental Impact Assessment (SEIA), and its Management Plan; B) Documents showing the legal ownership or lease of the Certification Unit, or legal use of customary land granted by the customary landowner; C) History of land ownership and legal or customary land use; D) List of current stakeholders; and E) Participatory mapping with affected communities showing the extent of their rights." <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the certification unit has been audited based on this provision.</p>
83	Indicator 4.1.2	<p>Request to remove indicator 4.1.2. For existing plantations and/or developments established after November 2007, the Unit of Certification shall comply with the applicable FPIC requirements as outlined in the RSPO Principles & Criteria (P&C) from 2007, 2013, 2018 and subsequent versions. The RSPO P&C shall not be applied retroactively.</p>
84	Indicator 4.1.2	<p>Request to remove the indicator 4.1.2. For existing plantations and/or developments established after November 2007, the Unit of Certification shall comply with the prevailing FPIC requirements as outlined in the RSPO Principles & Criteria (P&C) from 2007, 2013, 2018, and subsequent versions. RSPO P&C should not apply retroactively. Conducting participatory mapping with the current affected community at the existing plantation will be very controversial and difficult to implement. In the other scenario, such as a take-over company, the PM implementation by the new owner is very difficult. The RSPO/HRWG released the first FPIC Guide, developed through a multistakeholder consultative approach, in 2015. Therefore, this release date should be used as the cut-off for FPIC implementation.</p>

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87	Indicator 4.1.2	<p>Propose Cut Off Date Before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015 so that it becomes "For plantations and/or developments established after November 2015, the Certification Unit must provide evidence as follows:</p> <ul style="list-style-type: none"> A) Social Impact Assessment (SIA), Environmental Impact Assessment (EIA), or Social and Environmental Impact Assessment (SEIA), and its Management Plan; B) Documents showing the legal ownership or lease of the Certification Unit, or legal use of customary land granted by the customary landowner; C) History of land ownership and legal or customary land use; D) List of current stakeholders; and E) Participatory mapping with affected communities showing the extent of their rights." <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the certification unit has been audited based on this provision.</p>

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89	Indicator 4.1.2	<p>Propose Cut Off Date Before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015 so that it becomes "For plantations and/or developments established after November 2015, the Certification Unit must provide evidence as follows:</p> <p>A) Social Impact Assessment (SIA), Environmental Impact Assessment (EIA), or Social and Environmental Impact Assessment (SEIA), and its Management Plan;</p> <p>B) Documents showing the legal ownership or lease of the Certification Unit, or legal use of customary land granted by the customary landowner;</p> <p>C) History of land ownership and legal or customary land use;</p> <p>D) List of current stakeholders; and</p> <p>E) Participatory mapping with affected communities showing the extent of their rights."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the certification unit has been audited based on this provision.</p>
90	Indicator 4.1.2	<p>4.1.2</p> <p>Propose Cut Off Date Before November 2015 in accordance with the implementation of the Revised FPIC Guidelines of the RSPO HRWG Nov 2015 so that it becomes "For plantations and/or developments established after November 2015, the Certification Unit must provide evidence as follows:</p> <p>A) Social Impact Assessment (SIA), Environmental Impact Assessment (EIA), or Social and Environmental Impact Assessment (SEIA), and its Management Plan;</p> <p>B) Documents showing the legal ownership or lease of the Certification Unit, or legal use of customary land granted by the customary landowner;</p> <p>C) History of land ownership and legal or customary land use;</p> <p>D) List of current stakeholders; and</p> <p>E) Participatory mapping with affected communities showing the extent of their rights."</p> <p>Additional explanation: the 2018 standard (INA NI 2020) cut off date is November 2015 and the certification unit has been audited based on this provision.</p>

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92	Indicator 4.1.2	<p>4.1.2 For existing plantations and/or developments established after November 2007, the Unit of Certification shall comply with the prevailing FPIC requirements as outlined in the RSPO Principles & Criteria (P&C) from 2007, 2013, 2018, and subsequent versions. RSPO P&C should not apply retroactively. Conducting participatory mapping with the current affected community at the existing plantation will be very controversial and difficult to implement. In the other scenario, such as a take-over company, the PM implementation by the new owner is very difficult. The RSPO/HRWG released the first FPIC Guide, developed through a multistakeholder consultative approach, in 2015. Therefore, this release date should be used as the cut-off for FPIC implementation.</p>
93	Indicator 4.1.2	<p>Provide evidence participatory mapping for existing plantations before 2015 will be very difficult implemented for most growers due the RSPO released the first FPIC guide in 2015. So our recommendation is this standard should implemented for the existing plantations after the first guide released (after 2015)</p>
94	Indicator 4.1.2	<p>RSPO officially endorsed the first FPIC Guide that developed through a multistakeholder consultative approach in 2015. Therefore, this release date should be used as the cut-off for FPIC implementation.</p> <p>RSPO P&C should not apply retroactively to Nov 2007. Additionally, conducting participatory mapping with the previous land owner at the existing plantation will be very challenging and difficult to implement.</p>
95	Indicator 4.1.2	<p>Indicator 4.1.2 : Request to be removed.</p> <p>For existing plantations and/or developments established after November 2007, the Unit of Certification shall comply with the prevailing FPIC requirements as outlined in the RSPO Principles & Criteria (P&C) from 2007, 2013, 2018, and subsequent versions. RSPO P&C should not apply retroactively. Conducting participatory mapping with the current affected community at existing plantations would be very controversial and difficult to implement.</p> <p>In cases such as a company takeover, implementing participatory mapping by the new owner can also be very challenging. The RSPO/HRWG released the first FPIC Guide, developed through a multi stakeholder consultative approach, in 2015. Therefore, this release date should be used as the cut-off for FPIC implementation.</p>
96	Indicator 4.1.2	<p>Why in this indicator and 4.1.2 is it SIA and EIA; OR SEIA and management and monitoring plan? 2018 P&C was SEIA AND monitoring plan. Does two separate assessments negate need for monitoring plan? Should not do but wording suggests it</p> <p>Feedback type: Text/Wordsmithing</p>

No	Criteria/Indicator	Comment (English)
97	Indicator 4.1.2	<p>B) no longer linked to FPIC process like in 2018 4.4.1 - presumably because of the removal of the requirement for FPIC in existing plantations - see other comments on this. This is a weakening of the standard and the requirement to link this with the FPIC process needs to be added back in.</p> <p>E) 'showing extent of rights' - not clear what this means/would look like?</p> <p>Feedback type: Limitation/Justification</p> <p>Notes: Major concern - Weakening of the RSPO standard</p>
98	Indicator 4.1.3	There needs to have more clarity on the how to communicate with the communities.
99	Indicator 4.1.3	Add in criteria 4.1.3 in the Compliance Checklist column: "Evidence of a documented process for stakeholders to communicate in a language understood by the UoC regarding issues related to the UoC's operations."
100	Indicator 4.1.3	OK, the process cannot be made publiclz available. A procedure yes, but you cant publish a process.
101	Indicator 4.1.3	<p>While we support the addition of the requirement for these to be publicly available, not clear why some issues are signled out for this and others not? More clarity would be useful for the justification here</p> <p>Feedback type: Technical</p>

No	Criteria/Indicator	Comment (English)
102	Criteria 4.2	<p>Under SD 2024 4.2 and 4.2.1, 4.2.2, 4.2.3 and 4.2.4 for New Plantings the text has also been substantially weakened with numerous provisions removed. Whereas 2018 4.5 states that 'No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions', SD 2024 2024 4.2 is mute about land and instead just requires the FPIC process to be 'iterative, well-documented and enables affected communities to express their views and seek redress.'</p> <p>4.2.1 should read 'UoC shall obtain FPIC of communities whose [] rights may be affected.'"</p> <p>Text from 2018 4.5.2 has been deleted referring to the 'option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation'.</p> <p>Text from 2018 4.5.3 has also been deleted requiring that Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>Likewise 2018 4.5.5 and 4.5.6 have been deleted (4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. 4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.)</p> <p>SD 2024 deletes all references to peoples being represented by institutions of their own choosing, which are clear requirements in 2018 4.4, 4.5 and 4.6 .</p> <p>The Secretariat recognises that the changes made to the text represent a 'new approach' to FPIC and has proposed instead that rather than have detailed requirements set out in the P&C, instead the P&C are to be supplemented by a new 'Normative Document' that will set out the details of what is required to comply with FPIC. This document does not yet exist, even in draft, and to approve this new approach and unseen document would be to approve a 'blank cheque' or 'black box', and would not be good practice.</p> <p>It is unacceptable to try to substitute FPIC with ESIA's</p>

No	Criteria/Indicator	Comment (English)
103	Criteria 4.2	<p>2018 4.6 requires negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions and the corresponding Indicators require that:</p> <p>4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. 4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. 4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.</p> <p>4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. In SD 2024 4.2 all these requirements are deleted.</p> <p>Likewise the whole of 2018 4.7 with associated indicators has been deleted: 4.7 Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements. 4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place. 4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. 4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p>
104	Criteria 4.2	The second sentence in the criteria should be removed.

No	Criteria/Indicator	Comment (English)
105	Criteria 4.2	<p>2024 Criteria 4.2 - The major issue of the weakening of the provisions related to existing plantations.</p> <p>Oxfam notes with concern that 2024 Criteria 4.2 contains a significantly watered down text as compared to 2018 Criteria 4.5.</p> <p>2018 4.5 had specific reference to land and states that 'No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions' and contained 8 indicators (4.5.1 to 4.5.8) detailing the process to be followed and evidence to be submitted.</p> <p>Oxfam notes with concern the complete omission of reference to land in 2024 Criteria 4.2. It merely requires an FPIC process that is iterative, well-documented and enables affected communities to express their view and seek redress.</p> <p>We note with concern that:</p> <p>a)2018 Criteria 4.5.2, which provides for an FPIC process with 'full respect for their legal and customary rights to the territories, lands and resources' has been deleted. Deletion of 2018 4.5.2 which specifies that the FPIC process should respect the customary and legal rights to land, coupled with the omission in 2024 4.2 of any reference to land, places serious concerns relating to potential threats to land and territorial rights of the affected communities.</p> <p>b)Similarly, the right of local peoples to say 'no' to operations planned on their lands have been completely omitted in 2024 Criteria 4.2. This right was a part of 2018 Criteria 4.5.3 which provided that: 'Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations'. Further, 2018 Criteria 4.5.6 required evidence that communities gave their consent to initial planning to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. Oxfam notes with concern, the deletion of 2018 – 4.5.2 and 4.5.6. We reiterate that that the 'Consent' aspect of FPIC relates to the right to approve or reject a project or operations and key decisions throughout the project cycle and the right to say 'no' is an essential component.</p> <p>c)2018 Criteria 4.5.2 also requires companies to provide all relevant information and documentation, option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. Likewise, 2018 Criteria 4.5.5 has been deleted. 4.5.5 enables the community to access independent information and advice related to legal, economic, environmental and social implications of the proposed operations on their lands. The deletion of 2018 – 4.5.2 and 4.5.5, coupled with the proposed 2024 Criteria 1.1.1 which requires only companies to make documentation available 'upon request by stakeholders' places serious concerns relating to accessibility of information, transparency, accountability and power imbalances.</p>
106	Criteria 4.2	add an explicit reference to ensure that the consent during the FPIC process is not obtained by pressuring a local community, such as by cutting them off from public utilities (electricity, water)
107	Criteria 4.2	I recommend adding an explicit reference to ensuring that the consent during the FPIC process was not obtained by pressuring a local community, such as by cutting them off from public utilities (electricity, water)
108	Indicator 4.2.1	Propose to ensure that there is better flow between 4.2.1 and 4.2.4 to ensure that there is no repetition

No	Criteria/Indicator	Comment (English)
109	Indicator 4.2.1	With respect to C- the historical data can be obtained through a document issued by a competent entity in matters of land or property, or ethno-historical and historiographic analysis by a social expert.
110	Indicator 4.2.1	FPIC process also needs to be in line with the requirements of the EUDR! Please, mention that in criteria 4.2. Indirect or hidden pressures for community members or land owners to sign documents should be monitored through social research techniques. Please determine a separate indicator for that!
111	Indicator 4.2.1	- check the language
112	Indicator 4.2.1	The RSPO should align the criteria, indicators and guidance in the revised standard with the HCSA's Social Requirements and Implementation Guidance which includes the responsibility of fulfilment of the right to FPIC in accordance with international norms for new and existing developments. There should be no 'cut-off' date for a requirement to fulfil FPIC rights. The right to FPIC is ongoing and past violations of FPIC rights need to be remedied and not ignored by the RSPO certification systems. The standard should reference the following guidance: https://highcarbonstock.org/wp-content/uploads/2023/01/HCSA-Social-Requirements-2020.pdf.pagespeed.ce.VbNlYmOVRS.pdf https://highcarbonstock.org/wp-content/uploads/2023/01/HCSA-Implementation-Guide-2020-1.pdf.pagespeed.ce.v1Ew0yp_ba.pdf The RSPO should encourage members to utilize the various training tools developed by the HCSA. https://highcarbonstock.org/indigenous-community-rights/social-requirements-guides-training/
113	Indicator 4.2.1	To amend the last statement "latest version of the RSPO FPIC procedure" to "prevailing version of the RSPO FPIC"
114	Indicator 4.2.1	The FPIC is not necessarily carried out using the latest version, this will depend on the date of development of the FPIC, for this reason it is suggested to eliminate the following sentence: "The UoC will provide evidence of compliance with the latest version of the RSPO FPIC procedure"
115	Indicator 4.2.2	There is a translation issue (sentence structure) in the French version.
116	Indicator 4.2.2	In French, expropriation applies to a person not a property or land. Should review the definition because it is not appropriate in the French version. A property cannot be expropriated .
117	Indicator 4.2.2	The term expropriation is not clear. As in some countries expropriation can happen by government bank in as loan default or seizure due to illegal means
118	Indicator 4.2.2	- check the language
119	Indicator 4.2.2	Input on 4.2: There needs to be identification of community with disabilities
120	Indicator 4.2.3	What if the land that was acquired has been permitted by the government even though there are indications that the community is voluntarily isolating itself?
121	Indicator 4.2.4	To remove the word "negotiated agreement".. agreement with regard to FPIC? (SW)
122	Indicator 4.2.4	Should agreements that have nothing to do with the community also be communicated to the community?
123	Indicator 4.2.4	The "negotiated agreement" can only be defined for agreements made during the application of FPIC. An annual review will be conducted until the entire content of the agreement is completed.

No	Criteria/Indicator	Comment (English)
124	Indicator 4.2.4	Applicability is not easy, at the time of making the calls the participation of interested third parties cannot be forced, there is only the socialization record as a guarantee that the process of including them in the aforementioned consultation was fulfilled. If it is suggested that organisations that can support the FPIC process to communities can be present at consultation meetings, they should engage with communities on their own to avoid conflicts of interest or bias in favour of the UoC
125	Indicator 4.2.4	4.2.4 The Unit of Certification shall review implementation of any negotiated agreement(s) with the participation of affected communities annually, through a consultative process. Feedback: This "any negotiated agreement (s)" should only be defined for the agreement that is established during the FPIC implementation at the NPP stage. The annual review will be conducted until all contents in the agreement are completed.
126	Indicator 4.2.4	Suggestion to add: "The review is conducted by an independant 3rd party organisation with good relations to community members using social research techniques. Gaps in implementation shall be identified during annual monitoring and corrective action shall be taken."
127	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
128	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
129	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
130	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
131	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
132	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
133	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally

No	Criteria/Indicator	Comment (English)
134	Indicator 4.2.4	The Unit of Certification shall review the implementation of each agreement negotiated with the participation of affected communities annually, through a consultative process.
135	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
136	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
137	Indicator 4.2.4	Indicator 4.2.4. This “any negotiated agreement (s)” should only be defined for the agreement or MoU that is established during the FPIC implementation at the NPP stage. The annual review will be conducted until all contents in the agreement are completed.
138	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
139	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
140	Indicator 4.2.4	This “any negotiated agreement (s)” should only be defined for the agreement or MoU that is established during the FPIC implementation at the NPP stage. The annual review will be conducted until all contents in the agreement are completed.
141	Indicator 4.2.4	Remove this indicator because it requires more effort to find evidence of previous agreements and there is a chance of reclaiming previously agreed land. Not to mention disrupting social stability in the area which results in disrupting national stability.
142	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
143	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
144	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally

No	Criteria/Indicator	Comment (English)
145	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
146	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
147	Indicator 4.2.4	4.2.4 Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
148	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
149	Indicator 4.2.4	Propose to remove this indicator (negotiation reviewed annually/renegotiation) because: 1. For areas that have been managed/owned for a long time, more effort is needed to find evidence of previous agreements 2. There is an opportunity for reclaiming previously agreed land 3. It will disrupt social stability in the region and nationally
150	Indicator 4.2.4	4.2.4 This “any negotiated agreement (s)” should only be defined for the agreement or MoU that is established during the FPIC implementation at the NPP stage. The annual review will be conducted until all contents in the agreement are completed.
151	Indicator 4.2.4	Indicator 4.2.4: Needs to be clearer. The term “any negotiated agreement(s)” should refer only to agreements or MoUs established during the FPIC implementation at the NPP stage. The annual review will continue until all terms of the agreement have been fulfilled.
152	Criteria 4.3	It about land and resources NOT
153	Criteria 4.3	As captured, this appears to take out the requirement that there should be NO land conflicts in the area proposed for new planting/development, if you want to become RSPO certified. Should RSPO certify new areas where there is clearly land conflict ongoing? It doesn't seem so. Feedback type: Other (Please Specify) - Lowering the level of requirement?

No	Criteria/Indicator	Comment (English)
154	Criteria 4.3	<p>2018 4.8 requires that 'The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that that they have legal, customary or user rights.' This text is deleted as are many key elements in the indicators as indicated in red. 4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence of mutually agreed compensation has been made to all people who held, legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. 4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. 4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4). 4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>In partial replacement of all this, SD 2024 4.3 requires UoC to establish a Conflict Resolution Process. 4.3.3 does add some useful requirements: The Conflict Resolution System shall include the option for affected communities to access: A) Independent legal and technical advice; B) Mutually agreed third-party mediator; C) Any individual or groups chosen by the affected communities to act as their representative, or to support or act as observers; and D) Information and documents that are relevant to the land in dispute.</p> <p>Nevertheless, the requirements of SD 2024 4.3 are substantially weaker than the texts which it replaces.</p> <p>Solutions: A complete overhaul of P4 is required to restore the key requirements of 2018 P&C with respect to lands and FPIC. This will require consultations through an expert group before being sent back to a multistakeholder group for consensus building.</p>
155	Criteria 4.3	OK, the criteria should not make reference to specific issues "land and resources". As it reads now the UoC needs a specific conflict resolution system for land and resources. It should be generic applicable to all requirements.
156	Criteria 4.3	<p>The requirement for there to be no land conflicts in area for development seems to have been removed - is this correct? If so then this would be a major weakening of the standard. This needs to be reinstated in requirements.</p> <p>Feedback type: Limitation/Justification</p> <p>Notes: Major concern - Weakening of the RSPO standard</p>
157		
158	Indicator 4.3.1	the word 'and between' means UoC have to be an intermediary to this req. I don't think UoC want to let this happen
159	Indicator 4.3.1	UoC shall not be resolving conflict between communities. . For clarification purpose, please put the land conflict instead of just conflict in the indicator. The wording should be consistent. It needs to be the same conflict.
160	Indicator 4.3.1	Do not agree with the term 'in between them'. A UoC has not right mediating in between communities
161	Indicator 4.3.1	Propose to remove "between" affected communities because UoC shall not involve in the conflicts which are not involving the UoC.
162	Indicator 4.3.1	to remove "between affected communities"
163	Indicator 4.3.1	Propose to remove "between" affected communities because UoC shall not involve in the conflicts which are not involving the UoC.

No	Criteria/Indicator	Comment (English)
164	Indicator 4.3.1	New expectation for the unit of certification to participate in the dispute resolution between communities (expansion of scope), rather than between UoC and community. The UoC should focus on dispute resolution between UoC with affected communities only, as disputes between communities would be beyond the UoC's control.
165	Indicator 4.3.1	Regarding land tenure conflicts, the Conflict Resolution System must adhere to applicable legal requirements/processes. In no case should the CRS replace such legal requirements.
166	Indicator 4.3.1	Some comments for 4.3.1 (C): *Implementation: conflict resolution systems may differ for Children, Indigenous Peoples, and People with Disabilities *proposes that there be minimal technical guidance on the internal conflict resolution system. *Information about the System and the process for accessing the System is available and documented in clear language (adapted to local languages, languages understood by stakeholders), written, and simple."
167	Indicator 4.3.1	"between affected communities" suggest that the UoC has to be involved in resolving complaints between neighbouring communities. This is not appropriate.
168	Indicator 4.3.1	to remove "between affected communities" as the growers should not be obliged to resolve conflicts between communities unless it has direct /indirect connections to the UOC
169	Indicator 4.3.1	4.3.1 - We have an issue with the wording ' and between, affected communities'. It should not be seen as a standard that the UoC is seen as the go-to mediator for conflicts between communities. This is not the responsibility of the company, and could make relations with communities worse. We therefore request the wording 'and between' be removed.
170	Indicator 4.3.2	Suggest to remove the word "including illiterate parties"
171	Indicator 4.3.2	Revert to Draft 3
172	Indicator 4.3.2	Suggest to remove the word "including illiterate parties", revert back to the intention of Draft 3.
173	Indicator 4.3.2	There are three inputs in criterion 4.3.2, namely: * In the criterion 4.3.2 column, there is an additional word to become the Conflict Resolution System must be publicly available, and socialized to stakeholders (including illiterate parties and identified target groups). * In the Informative Guidance column in the Implementation section, there is an additional word to become Implementation: - If necessary, the System and its processes must be explained to stakeholders verbally. A translator and subject matter expert must be involved for this purpose, to improve the understanding of the vulnerable group. * In the Compliance Checklist column, there is an additional word to become Evidence that stakeholders know about the System and its processes through written and oral explanations and the involvement of the UoC in a language that is understood by the target group of stakeholders, especially vulnerable groups.
174	Indicator 4.3.2	Replace "socialised" with "communicated"
175	Indicator 4.3.3	To be clear that this is about land conflict (item D)

No	Criteria/Indicator	Comment (English)
176	Indicator 4.3.3	Change the word communities to affected party. As conflict resolution mechanism can affect different stakeholders- not only communities
177	Indicator 4.3.3	Maybe independent judicial or non-judicial advisory services.
178	Indicator 4.3.3	The documented system for addressing conflict and natural resources should include a mechanism for community actors beyond local leaders (officials) and allow for third-party accompaniment for more qualified participation
179	Indicator 4.3.3	Propose to revert to the intention of Draft 3.
180	Indicator 4.3.3	Revert to Draft 3
181	Indicator 4.3.3	Propose to revert to the intention of Draft 3.
182	Indicator 4.3.3	It should be clear for UoC that having their CRS include the option for affected communities to: (a) independent legal and technical advice; and/or (b) a mutually agreed third-party mediator, does not necessarily mean they should pay for it.
183	Indicator 4.3.3	Input on criteria 4.3.3 (C): * In Checklist Point one, namely "UOCs that have cases must include records and documentation of cases brought to the conflict resolution system. * Information guide "The subject matter expert in question is an expert on the target group intended as the reader of the policy" (example: if socialization is carried out to the Papuan indigenous community, there must be an expert on the Papuan indigenous community.)
184	Indicator 4.3.4	In order to avoid causing a bigger conflict, it is better to map disputed land separately with each government party, in this case the National Land Agency.
185	Indicator 4.3.4	If participatory mapping is applicable, it is suggested to include other organizations within the process
186	Indicator 4.3.4	Participatory mapping would be a huge challenge for the growers as participatory mapping is a complex process involving various neighbouring communities. Propose to revert to the intention of Draft 3. Mapping in participatory manner is more feasible compared to participatory mapping (formal complex process).
187	Indicator 4.3.4	Revert to Draft 3
188	Indicator 4.3.4	Participatory mapping would be a huge challenge for the growers as participatory mapping is a complex process involving various neighbouring communities. Propose to revert to the intention of Draft 3. Mapping in participatory manner is more feasible compared to participatory mapping (formal complex process).
189	Indicator 4.3.4	What if the Unit of Certification (UoC) has already conducted participatory mapping, for example, through an ALS-reviewed HCV-HCSA process, and the 'affected' communities raising the dispute subsequently were not identified as affected stakeholders during this previous participatory mapping process?
190	Indicator 4.3.5	Propose to revert to the intention of Draft 3. Also suggest to remove "the reasons hindering resolution", this is not implementable
191	Indicator 4.3.5	Revert to Draft 3
192	Indicator 4.3.5	Propose to revert to the intention of Draft 3. Also suggest to remove "the reasons hindering resolution", this is not implementable

No	Criteria/Indicator	Comment (English)
193	Indicator 4.3.5	<p>Input to Criterion 4.3.5, mainly on the Steps taken to resolve the conflict raised must be documented, maintained, updated and owned by the parties.</p> <p>Indicator: The results of the conflict resolution must be available to and must be understood by the affected community (and their representatives, if any). If the conflict is not resolved, the UoC must document the reasons that hinder resolution and the steps that must be taken to achieve resolution; this information must be clearly communicated to all parties involved in the conflict.</p> <p>Then in the column for informative guidance: add an explanation why it must be owned by the parties, namely to ensure transparency and accountability of the process. prevent the occurrence of different documentation that is understood by other parties."</p>
194	Indicator 4.3.5	Does indicator refer to recorded compliants? Or specific to land issues?
195	Criteria 4.4	4.4 talks about remediation while 4.3 also talks about grievance on land - why is there a diff indicator? Is it not same or linked?
196	Criteria 4.4	What do you mean by affected communities? There are 2 types of affected communities on Cote D'ivor, there are those that give their land (land owners) and those affected by the production activities (impacted by social impact assessment).
197	Criteria 4.4	<p>It needs to be much more explicit that remediation is not always an automatically available route through which to become certified under RSPO, otherwise RSPO is not a mechanism to prevent deforestation and protect HCVs and HCS forest, biodiversity, environmental and cultural values.</p> <p>Feedback type: Text/Wordsmithing</p>
198	Criteria 4.4	<p>2024 – Criteria 4.4 - The major issue of the removal of provisions related to compensation for loss.</p> <p>We note with concern the significant watering down of 2024 Criteria 4.4.1 which is limited to establishing 'procedures for providing remediation as a mechanism for resolving conflict over land and resources' with an option to provide monetary or non-monetary remedies. 4.4.1C provides that remediation procedure 'may' provide monetary or non-monetary remedies. This is a significant weakening of the 2018 P&C which included stronger provisions related to payment of compensation including:</p> <p>a) Negotiations concerning compensation for loss of legal, customary or user rights to be dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions (2018 – 4.6)</p> <p>b) Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements (2018 – 4.7)</p> <p>c) 2018 Criteria 4.6 and 4.7 had strong and detailed indicators. The entirety of 2018 4.6 and 4.7 have been deleted.</p>

No	Criteria/Indicator	Comment (English)
199	Criteria 4.4	<p>The biggest change is with respect to Free, Prior and Informed Consent. 2018 4.4 requires that 'Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.' Detailed requirements are set out in 2018 4.4.1, 4.4.2, 4.4.3, 4.4.4, 4.4.5 and 4.4.6. Stronger FPIC provisions are set out for New Plantings in 2018 4.5.</p> <p>Instead SD 2024 4.1.1, 4.1.2 and 4.1.3 propose deleting the requirement for FPIC for 'existing plantations' (distinguished between those before 2007 and those established after 2007) and instead only require evidence of Social and Environmental Impact Assessments with a corresponding management plan, and – for after 2007 – proof of legal agreements for use of customary lands, land tenure studies and participatory mapping.</p> <p>Under SD 2024 4.2 and 4.2.1, 4.2.2, 4.2.3 and 4.2.4 for New Plantings the text has also been substantially weakened with numerous provisions removed. Whereas 2018 4.5 states that 'No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions', SD 2024 2024 4.2 is mute about land and instead just requires the FPIC process to be 'iterative, well-documented and enables affected communities to express their views and seek redress.'</p>
200	Indicator 4.4.1	Content is for compliance requirements yet text in (*) includes "should" a couple of times.
201	Indicator 4.4.1	Remediation of social and environmental harm should NOT be easy to access.
202	Indicator 4.4.1	The important points of indicator 4.4.1 are already in indicator 4.3.2. (related to conflict resolution procedures) and indicator 4.3.5 (related to points of agreement including remediation aspects), so indicator 4.4.1 is no longer needed.
203	Indicator 4.4.1	The indicator should mention that the UoC shall establish the remediation procedure only if there is a remediation needed.
204	Indicator 4.4.1	The Unit of certification must have an understanding of the division of roles and perceptions of the community in the planning and decision-making process. In communities where the voice of one group is not involved, the company should do its best to involve them.
205	Indicator 4.4.1	Is this a requirement for CH that have land conflicts or all CH even the ones without land conflicts need to have it?
206	Indicator 4.4.1	4.4/4.4.1 - We question why this is a criteria on its own, and not part of 4.3. 4.3 takes into account the Conflict Resolution System. Having 4.4 on its own, makes it seem as if a remediation is always needed following a resolution. A resolution may be reached without a remediation.
207	Criteria 4.5	<p>The framing of this suggests an overall problem with the respecting of local rights, so consider intent.</p> <p>Feedback type: Text/Wordsmithing</p>
208	Criteria 4.5	Criteria 4.5 and Indicator 4.5.2: The identified needs of communities are included, according to the company's capabilities, to the extent that the company can infer them through a plan. Contribution to the needs of the communities, in mutual agreement with the company.
209	Indicator 4.5.1	How do you end up with "affected communities"? Consider the logic of this. If rights are respected, then RSPO should not be certifying cases where there ends up being affected communities due to inappropriate palm oil plantation development.
210	Indicator 4.5.1	<p>Sustain 4.5.1</p> <p>4.5.1 Contributions to community development shall be based on the results of consultation with Affected Communities and shall be documented.</p>

No	Criteria/Indicator	Comment (English)
211	Indicator 4.5.1	Propose to revert to Draft 3 as UoC normally access or grant the contribution for communities based on the needs of the communities during consultation process but not the other way round as stipulated in Draft 1.0 i.e consult the communities with proposed contribution.
212	Indicator 4.5.1	- Revert to Draft 3 (use Draft 3 indicator and re-drafted in accordance drafting guidelines)
213	Indicator 4.5.1	Propose to revert to Draft 3 as UoC normally access or grant the contribution for communities based on the needs of the communities during consultation process but not the other way round as stipulated in Draft 1.0 i.e consult the communities with proposed contribution.
214	Indicator 4.5.1	Indicator: The Unit of Certification shall consult with communities affected by the company's operations in its proposed contribution to community development. Such consultations shall be documented.
215	Indicator 4.5.1	Proposed that there should be limits on the proposed contribution to community development.
216	Indicator 4.5.1	Proposed that there should be limits on the proposed contribution to community development.
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219	Indicator 4.5.1	Proposed that there should be limits on the proposed contribution to community development.
220	Indicator 4.5.1	There should be limits on the proposed contribution to community development.
221	Indicator 4.5.1	Indicator 4.5.1. Request to use Draft 3: 4.5.1 Contributions to community development shall be based on the results of consultation with Affected Communities and shall be documented.
222	Indicator 4.5.1	Proposed that there should be limits on the proposed contribution to community development.
223	Indicator 4.5.1	Proposed that there should be limits on the proposed contribution to community development.
224	Indicator 4.5.1	Request to use Draft 3: 4.5.1 Contributions to community development shall be based on the results of consultation with Affected Communities and shall be documented.
225	Indicator 4.5.1	4.5.1 Contributions to community development shall be based on the results of consultation with Affected Communities and shall be documented.
226	Indicator 4.5.1	Indicator 4.5.1 : Request to use Draft 3: Contributions to community development shall be based on the results of consultation with Affected Communities and shall be documented.
227	Indicator 4.5.2	To remove "based on community needs" because is not the only justification and only 1 of the consideration
228	Indicator 4.5.2	Indicator: Community development contributions from the Unit of Certification are implemented based on community needs. These community needs are based on the results of the social impact assessment analysis and social management plan in accordance with 4.1.1.
229	Indicator 4.5.2	Proposed that "based on community needs" be removed because it is difficult to limit the needs of a very diverse community.
230	Indicator 4.5.2	Proposed that "based on community needs" be removed because it is difficult to limit the needs of a very diverse community.

No	Criteria/Indicator	Comment (English)
231	Indicator 4.5.2	Proposed that "based on community needs" be removed because it is difficult to limit the needs of a very diverse community.
232	Indicator 4.5.2	Proposed that "based on community needs" be removed because it is difficult to limit the needs of a very diverse community.
233	Indicator 4.5.2	Proposed that "based on community needs" be removed because it is difficult to limit the needs of a very diverse community.
234	Indicator 4.5.2	Proposed that "based on community needs" be removed because it is difficult to limit the needs of a very diverse community.
235	Indicator 4.5.2	Proposed that "based on community needs" be removed because it is difficult to limit the needs of a very diverse community.
236	Indicator 4.5.2	Indicator 4.5.2. Request to remove the indicator 4.5.2. Indicator 4.5.2. is a bit contradictory with indicator According to the indicator 4.5.1, consultation with affected communities is the key requirement of this indicator.
237	Indicator 4.5.2	Proposed that "based on community needs" be removed because it is difficult to limit the needs of a very diverse community.
238	Indicator 4.5.2	Proposed that "based on community needs" be removed because it is difficult to limit the needs of a very diverse community.
239	Indicator 4.5.2	Request to remove the indicator 4.5.2. Indicator 4.5.2. is a bit contradictory with indicator According to the indicator 4.5.1, consultation with affected communities is the key requirement of this indicator.
240	Indicator 4.5.2	Proposed that "based on community needs" be removed because it is difficult to limit the needs of a very diverse community.
241	Indicator 4.5.2	4.5.2 Is a bit contradictory with indicator According to the indicator 4.5.1, consultation with affected communities is the key requirement of this indicator
242	Indicator 4.5.2	Indicator 4.5.2 : Request to be removed Indicator 4.5.1 clearly stipulates that contributions to community development must be based on consultations with affected communities, which is a key requirement. Given that this requirement is already addressed comprehensively in Indicator 4.5.1, Indicator 4.5.2 appears redundant and potentially contradictory. Therefore, we recommend removing Indicator 4.5.2 to avoid any overlap and ensure that the requirements are streamlined and consistent.
243	Indicator 4.5.3	Not agree with "jointly monitor" because what is the objective of doing it jointly?
244	Indicator 4.5.3	Informative guide: In order to carry out monitoring and consultation, a joint committee of UoC and Community (ensuring representation of vulnerable groups) needs to be formed. The function and role of the committee includes creating and agreeing on monitoring and consultation achievement indicators.
245	Indicator 4.5.3	I don't think its appropriate to ask for jpoint monitoring. I don't know how this would be done in practice.
246	Indicator 4.5.3	Propose that this Indicator be removed because it is already covered in other indicators related to CSR. If it cannot be removed, the indicator can be changed to "The Unit of Certification monitors the contribution made to sustainable community development."
247	Indicator 4.5.3	Propose that this Indicator be removed because it is already covered in other indicators related to CSR. If it cannot be removed, the indicator can be changed to "The Unit of Certification monitors the contribution made to sustainable community development."
248	Indicator 4.5.3	Propose that this Indicator be removed because it is already covered in other indicators related to CSR. If it cannot be removed, the indicator can be changed to "The Unit of Certification monitors the contribution made to sustainable community development."
249	Indicator 4.5.3	Propose that this Indicator be removed because it is already covered in other indicators related to CSR. If it cannot be removed, the indicator can be changed to "The Unit of Certification monitors the contribution made to sustainable community development."
250	Indicator 4.5.3	Propose that this Indicator be removed because it is already covered in other indicators related to CSR. If it cannot be removed, the indicator can be changed to "The Unit of Certification monitors the contribution made to sustainable community development."

No	Criteria/Indicator	Comment (English)
251	Indicator 4.5.3	Propose that this Indicator be removed because it is already covered in other indicators related to CSR. If it cannot be removed, the indicator can be changed to "The Unit of Certification monitors the contribution made to sustainable community development."
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255	Indicator 4.5.3	Propose that Indicator 4.5.3 be removed because it is already covered in other indicators related to CSR. If it cannot be removed, the indicator can be changed to "The Unit of Certification monitors the contribution made to sustainable community development."
256	Indicator 4.5.4	further define 'beneficiar' or 'benefit'.
257	Indicator 4.5.4	<p>Informative Guidance: The UoC shall provide opportunities for affected communities to benefit from its business operations, including potential employment, royalty payments, or consideration for positions in decision-making roles within the UoC. The choice of such benefits shall be based on discussion and mutual agreement. Affected communities shall be informed of such opportunities.</p> <p>Where candidates for employment within the UoC have equal abilities and skills, preference shall be given to members of the affected community. Positive discrimination is recognized as not inconsistent with Criterion 6.1. Where the agreed upon benefit options are not available to the community, the UoC shall provide support and capacity building.</p>
258	Indicator 4.5.4	Why is this indicator restricted to communities that lost access or land? They have to be compensated as per 4.4.1. This requirement should refer to all affected communities.
259	Indicator 4.5.4	<p>Propose that the indicator be changed to remove the word "Must", to become "Affected communities who have lost access and/or land rights are given the opportunity to benefit from the operations of the Unit of Certification"</p> <p>It is necessary to consider the placement of indicator 4.5.4 because criterion 4.5 discusses community development while 4.5.4 is too specific in discussing affected communities and those who have lost access who are already part of the community discussed in indicators 4.5.1-4.5.3</p>
260	Indicator 4.5.4	<p>Propose that the indicator be changed to remove the word "Must", to become "Affected communities who have lost access and/or land rights are given the opportunity to benefit from the operations of the Unit of Certification"</p> <p>It is necessary to consider the placement of indicator 4.5.4 because criterion 4.5 discusses community development while 4.5.4 is too specific in discussing affected communities and those who have lost access who are already part of the community discussed in indicators 4.5.1-4.5.3</p>
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No	Criteria/Indicator	Comment (English)
262	Indicator 4.5.4	<p>Propose that the indicator be changed to remove the word "Must", to become "Affected communities who have lost access and/or land rights are given the opportunity to benefit from the operations of the Unit of Certification"</p> <p>It is necessary to consider the placement of indicator 4.5.4 because criterion 4.5 discusses community development while 4.5.4 is too specific in discussing affected communities and those who have lost access who are already part of the community discussed in indicators 4.5.1-4.5.3</p>
263	Indicator 4.5.4	<p>Propose that the indicator be changed to remove the word "Must", to become "Affected communities who have lost access and/or land rights are given the opportunity to benefit from the operations of the Unit of Certification"</p> <p>It is necessary to consider the placement of indicator 4.5.4 because criterion 4.5 discusses community development while 4.5.4 is too specific in discussing affected communities and those who have lost access who are already part of the community discussed in indicators 4.5.1-4.5.3</p>
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267	Indicator 4.5.4	<p>Propose that the indicator be changed to remove the word "Must", to become "Affected communities who have lost access and/or land rights are given the opportunity to benefit from the operations of the Unit of Certification"</p> <p>It is necessary to consider the placement of indicator 4.5.4 because criterion 4.5 discusses community development while 4.5.4 is too specific in discussing affected communities and those who have lost access who are already part of the community discussed in indicators 4.5.1-4.5.3</p>

No	Criteria/Indicator	Comment (English)
1	Principle 5	Propose to revert to the intention of Draft 3 for P5. Concern on the uptake and support for ISH certified smallholders should be tackled in a separate platform.
2	Criteria 5.1	Translation in French indicates will engage (future) while in English using shall which applies requirement
3	Criteria 5.1	How do you define trade in a "fair" way. No definition of "fair" in the definitions. Feedback type: Implementability/Auditability
4	Criteria 5.1	The company must demonstrate the management of inclusion of small producers with a schedule of activities
5	Criteria 5.1	Compliance requirements: schedule of activities, budget, beneficiaries, characterization of the producer.
6	Criteria 5.1	The criterion does not specify that it refers to interested small producers
7	Criteria 5.1	While the ISH (Independent smallholder) still faces challenges with sustainability knowledge and capacity, this criteria should specify the necessary support from UoC (unit of certification) to help ISH obtain RSPO Certification. ISH requires more guidance and support on sustainability practice to successfully achieve and maintain RSPO Certification.
8	Criteria 5.1	While the ISH (Independent smallholder) still faces challenges with sustainability knowledge and capacity, this criteria should specify the necessary support from UoC (unit of certification) to help ISH obtain RSPO Certification. ISH requires more guidance and support on sustainability practice to successfully achieve and maintain RSPO Certification. Feedback type: Technical
9	Indicator 5.1.1	Several indicators that were merged were critical (C) but after the merging the indicator is no longer critical. This has to be looked at.
10	Indicator 5.1.1	Socialize the benefits of RRF certification
11	Indicator 5.1.1	Recognition of improvement
12	Indicator 5.1.1	The term just should be clarified through a guide or definition
13	Indicator 5.1.1	Improve the wording to clarify the objective of this indicator that includes all small producers but that must have a special interest in those certified.
14	Indicator 5.1.1	The risk of Non-Compliance increases when there are several compliance requirements in a single indicator.
15	Indicator 5.1.1	Replace "conduct" with either "engage" or "deal" or some other relevant term.
16	Indicator 5.1.2	Regional team noticed that the version that they proofread was not the one that is being shared to stakeholders for consultation (in the information pack). This resulted into mis-interpretation of certain words by stakeholders due to unclarity or incorrect interpretation.
17	Indicator 5.1.2	Improve the wording of "agreed agreements"
18	Indicator 5.1.2	The fusion of multiple indicators increases the risk of non-compliance by making it critical.
19	Indicator 5.1.2	How can it be proven that the agreement was reached fairly and transparently? Considering that, according to Indonesian law, a signed contract signifies an agreement/consent by both parties. Additionally, contracts and agreements must be made in good faith.

No	Criteria/Indicator	Comment (English)
20	Indicator 5.1.2	Ensure that the unit of certification is clearly defined which includes independent and scheme smallholders, to show inclusivity first , before looking for evidence to show that the unit of certification regularly explains the FFB pricing to smallholders.
21	Indicator 5.1.2	Replace "evidence shall be demonstrated" with "evidence shall be provided"
22	Indicator 5.1.3	To add in the listed item, the agreed timeline for payment to be paid by UoC to SH group need to be captured (eg payment within 30 days, etc)
23	Indicator 5.1.3	Replace "evidence shall be demonstrated" with "evidence shall be provided"
24	Indicator 5.1.4	Propose for the RSPO to develop the guidance/procedure to enable the proposed scenario in this indicator.
25	Indicator 5.1.4	Will the information on the Certified Independent ISH FFB status be available on PRiSMA? This is to allow the UoC to know whether the smallholder is certified or not and do not need to do further due diligence.
26	Indicator 5.1.4	This P&C is positive for the ISH. We hope that RSPO can give stronger push to the company to buy from certified smallholders and to focus and provide other empowerment to ISH. However the price of certified and not certified IS-FFB is the same.
27	Indicator 5.1.4	We highly appreciate this effort, we have been waiting for this for quite some time. But we need to make it clear what is implementable for the sales of the FFB. Maybe the farmers can give more special treatments to the certified ISH including a special lane and a longer partnership.
28	Indicator 5.1.4	We hope that once you implement this, you will prepare a guidance on how to do this or it will be challenging for all parties.
29	Indicator 5.1.4	To ensure that this requirement does not implicate intend to ONLY focus on interested certified smallholders, suggest to change 'in particular' to 'not excluding'
30	Indicator 5.1.4	what is diff between engaged and consult
31	Indicator 5.1.4	How would auditor know if ISH interested?
32	Indicator 5.1.4	Suggest to add 'where possible'
33	Indicator 5.1.4	Some SH that they support prefer to sell their FFB as credit
34	Indicator 5.1.4	Premium? Fair? How are these terms practically relevant to fairness and proper pricing? This seems to be unclear in relation to reality of context in the market. Feedback type: Implementability/Auditability
35	Indicator 5.1.4	Compliance requirements are pending (TBC); this should include NO price fixing Feedback type: Implementability/Auditability
36	Indicator 5.1.4	The involvement of independent smallholders in the RSPO certification process requires a long process and depends on the interest of the smallholders themselves. This indicator should focus on the form of support from the certification unit if there are independent smallholders who are independently interested in the certification program. Making this a major indicator may give the impression that it must be fully realized by the smallholders and that it is the responsibility of the certification unit to make it happen

No	Criteria/Indicator	Comment (English)
37	Indicator 5.1.4	Action plan as a compliance requirement
38	Indicator 5.1.4	Review the action plan annually
39	Indicator 5.1.4	The indicator is not easy to audit due to the subjectivity of how I demonstrate to an audit process whether the small owner is interested or not, in a timely manner, when possible, etc
40	Indicator 5.1.4	Overall, growers support smallholders by purchasing their FFB. However, there is a concern with Identity Preserved (IP) Mills. Many growers in Malaysia are reluctant to accept FFB from smallholders due to uncertainties about its source. Often, smallholders wish to sell certified FFB to IP Mills, but the credits have already been sold earlier. As a result, growers exclude smallholders' FFB to maintain the integrity of IP Mills. Overall, most of growers are buying non certified FFB to support Inclusion of Smallholders in Principle 5 - Grower decision: revert to Draft 3
41	Indicator 5.1.4	Include the word 'deductions' in the second sentence. Deductions can be related to service charges on the FFB transportation, etc. Second sentence - 'These include those involving finance, loans/credits, deductions and repayments through FFB price reductions for replanting and/or other support mechanisms where applicable
42	Indicator 5.1.4	Overall, growers support smallholders by purchasing their FFB. However, there is a concern with Identity Preserved (IP) Mills. Many growers in Malaysia are reluctant to accept FFB from smallholders due to uncertainties about its source. Often, smallholders wish to sell certified FFB to IP Mills, but the credits have already been sold earlier. As a result, growers exclude smallholders' FFB to maintain the integrity of IP Mills. Overall, most of growers are buying non certified FFB to support Inclusion of Smallholders in Principle 5.
43	Indicator 5.1.4	In the informative guide of preferences and priorities for independent farmers if implemented will have an impact on mills that implement the IP model. Certified farmers have received a premium price through Book and Claim, if sold to a certified Mill will ask for a premium price and risk double claims.
44	Indicator 5.1.4	To support the engagement of independent smallholders and strengthen traceability in the downstream sector, the Unit of Certification shall actively engage, consult with and provide opportunities for smallholders to access RSPO certified supply chains where possible; in particular with respect to interested certified smallholders.
45	Indicator 5.1.4	Request to remove indicator 5.1.4. (If no guidance) RSPO should develop guidance/procedures to allow for the proposed scenario. Currently, independent certified smallholders sell their credits through the Book and Claim (PlamTrace) mechanism and benefit from the certified volumes they produce. This scenario sees them supplying their FFB to RSPO certified mills as uncertified FFB.
46	Indicator 5.1.4	Request to remove the indicator 5.1.4. (If no guidance) RSPO should develop the guidance/procedure to enable the proposed scenario. Currently, the certified independent smallholders sell their credit through Book and Claim (PlamTrace) mechanism and get the benefit from the certified volume they produce. This scenario makes them supply their FFBs to the RSPO certified mills as non-certified FFBs.

No	Criteria/Indicator	Comment (English)
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52	Indicator 5.1.4	Request to remove the indicator 5.1.4. (If no guidance) RSPO should develop the guidance/procedure to enable the proposed scenario. Currently, the certified independent smallholders sell their credit through Book and Claim (PlamTrace) mechanism and get the benefit from the certified volume they produce. This scenario makes them supply their FFBs to the RSPO certified mills as non-certified FFBs.
53	Criteria 5.2	Regarding plantation practices, step 5.2.1 already fulfills the requirements of indicator 5.2.3. Therefore, it is suggested that 5.2.3 be removed
54	Criteria 5.2	Drafting of the criteria for them to improve their productivity and not livelihoods.
55	Criteria 5.2	Proposal to amend current wording of 5.2.3 to recognize the potential of increased agrobiodiversity in plantations to contribute to livelihood improvements of smallholders. Refined indicator: "The Unit of Certification shall develop and implement additional activities that contribute to livelihood improvement of smallholders supplying FFB to its mill, taking into consideration the results of participatory consultations conducted with them and considering the options of increased agrobiodiversity in and around plantations."

No	Criteria/Indicator	Comment (English)
56	Criteria 5.2	- Growers feels like there is no changes required if all the caucauses all are okay with Draft 3 - Growers request the data on NC for P5 to assess the gaps.
57	Criteria 5.2	Criteria 5.2 and Indicator 5.2.2: Define the agricultural practices in the management plan Specify the “support” or “help” plan referred to, these should be training or technical assistance.
58	Indicator 5.2.1	How to able to audit 'interests' among SH within the supply base of a UoC.
59	Indicator 5.2.1	Regarding plantation practices, step 5.2.1 already fulfills the requirements of indicator 5.2.3. Therefore, it is suggested that 5.2.3 be removed
60	Indicator 5.2.1	Compliance requirement: review of the support plan on an annual basis
61	Indicator 5.2.1	Compliance requirement: review of the implementation of the support plan on an annual basis
62	Indicator 5.2.1	Indicator 5.2.1, Indicator 5.2.2 and Indicator 5.2.3: Refer only to good agricultural practices and productivity, while the criterion has a broader focus on livelihoods
63	Indicator 5.2.2	We should strive to achieve the international standard stated in the indicator
64	Indicator 5.2.2	We do not mention any female smallholders/ any mentions of gender, does this mean, we do not take into account the the female smallholders. [Ans: This has been moved to the compliance requirements]
65	Indicator 5.2.2	How would this be audited? Testing smallholders on BMP/GAPs? Will there be a set of questions asked? Feedback type:Technical
66	Indicator 5.2.3	Under Compliance Req: Suggestion to allow oppurtunity for diversification of support to SH livelihood which should not just limited to oil palm (eg support on chicken rearing, cow/livestock, vegetables, etc)
67	Indicator 5.2.3	What is meant by additional initiatives?
68	Indicator 5.2.3	Compliance requirement: socio-economic profile for the improvement of their living conditions
69	Indicator 5.2.3	Requirements broad here and need clarifying, especially re how to audit. Would this go beyond oil palm cultivation, to schools, roads, loans etc? Feedback type:Technical

No	Criteria/Indicator	Comment (English)
1	Principle 6	Please consult the review study for the Labour Auditing Guidance that RSPO commissioned Proforest to carry out. Draft 1 will be shared the first week of September and will include recommendations for elements to include or align with the P&C.
2	Principle 6	the labour audit guidance to be revisited and used to make principle 6 auditable
3	Principle 6	The increased of uptake in accordance with the higher of standard. Does the buyer uptake also increased?
4	Principle 6	Due dilligence applies to the new player not to old player
5	Criteria 6.1	We welcome the clarification between “Individuals that perform work for pay” and “Individuals that perform work for the organization.” We encourage the RSPO to review the exposure draft of the GRI Topic Standard Project for Labor Control of Work Standard Interpretation to GRI 2 for further insights. https://www.globalreporting.org/media/hcxigp3i/gri-topic-standard-project-for-labor_control-of-work-standard-interpretation-to-gri-2-exposure-draft.pdf
6	Criteria 6.1	Yes
7	Criteria 6.1	6.1 It should be clear that “discipline, termination, retirement-related decisions” are added where non-discrimination should apply
8	Criteria 6.1	6.1 It should be clear that “discipline, termination, retirement-related decisions” are added where non-discrimination should apply
9	Criteria 6.1	The labour audit guidance which was developed should become the common way of auditing on principle 6.
10	Indicator 6.1.1	Too focused on easy to provide documents rather than actual performance to ensure compliance. This compliance checklist has focused on evidence of having and sharing a non-discrimination policy, but does not include means of verification for the implementation of the non-discrimination policy (which is part of the indicator). Feedback type: Implementability/Auditability
11	Indicator 6.1.1	Is the socialization of the non-discrimination policy also socialized to local contractors?
12	Indicator 6.1.1	Should be more specific: "The non-discrimination policy shall include prohibition against discrimination based on: a) Race, color, sex, sexual orientation, gender, caste, religion, political opinion, national extraction or social origin; b) Nationality or migratory status; c) Civil status; d) Medical condition; e) Family condition, including pregnant women and parents with children, or any other protected status as included in applicable laws; f) Worker organization membership or being an organizer; g) Having filed complaints within the complaints or grievance mechanisms; h) Unequal opportunities for gender when appointing management positions; i) Political, religious, social, sexual or cultural opinions and convictions, views or affiliations of workers."

No	Criteria/Indicator	Comment (English)
13	Indicator 6.1.1	<p>New proposed indicator 6.1.4 Certification Unit must establish and implement affirmative action policies in the form of education (skill development), and provide recruitment quotas for disabled workers and communities around the plantation area.</p> <p>Argument: During the initial socialization to obtain an operating permit from the community (social license to operate), one of the benefits promised by the company related to the development of oil palm plantations was the recruitment of workers for the community from surrounding villages. However, in practice, the recruitment process does not provide equal opportunities on the grounds that the surrounding community does not meet the standards required by the company, for example, education level, skills, and discipline. Therefore, the company needs to take several affirmative actions for education (skill development) and provide quotas for the surrounding community and disabled as workers. This affirmative action is a form of fulfilling the promise at the initial socialization of plantation development, an effort to provide benefits to the surrounding community and reduce conflict.</p>
14	Indicator 6.1.2	<p>Process of worker input required</p> <p>Feedback type: Implementability/Auditability</p>
15	Indicator 6.1.2	Suggest RSPO to state somewhere on the clarity for 'equal opportunities' in terms of the auditability of the statement.
16	Indicator 6.1.2	Proposed revision - (C) Evidence is provided that all parties are aware, understand, and assure that they have not been discriminated against. This includes evidence of the non-payment of recruitment fees of the migrant workers.
17	Indicator 6.1.2	<p>What does this look like? A commitment? Unclear how it would be audited</p> <p>Feedback type: Implementability/Auditability</p>
18	Indicator 6.1.3	Recommend to based on evaluation according to the quality of work and the company's job classification and type standards without including the word experience.
19	Indicator 6.1.3	<p>To add that there shall be no PSA testing. PSA is Prostate-specific antigen, to test risk of prostate cancer.</p> <p>Proposed revision - PSA (for men) and pregnancy (for women) testing is not conducted during hiring as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>
20	Indicator 6.1.3	<p>Should this include evidence that all workers receive remuneration for work of equal value and evaluation?</p> <p>Feedback type: Implementability/Auditability</p>
21	Criteria 6.2	Is there any period limitation to take on the stepwise approach?
22	Criteria 6.2	I have an issue with the term 'industry' minimum standard, what is meant by industry? need to specify which Industry. Be more specific. At least the Agriculture industry

No	Criteria/Indicator	Comment (English)
23	Criteria 6.2	The working and LIFE conditions of all workers shall comply with the requirements of the Labour Force... it is important to clearly define which are the LIFE conditions that would apply here and that must be complied with by the certification unit. If it is applicable only to those who live in plantations, the clarity should be left.
24	Criteria 6.2	This does raise some concerns I know, at the site of the some of the labor unions we working with in Indonesia. Because it does not necessarily include the wages. If they are negotiated as part of a collective bargaining agreement, and then they are higher than the minimum standards.
25	Criteria 6.2	the word mimimum should be erased, as it leads to confusion. Instead use: to meet legal standards
26	Criteria 6.2	It is not clear what living conditions entail, it must be defined what living conditions are.
27	Criteria 6.2	In term of auditability, instead of working to splitting the criteria, it better to improve the definition of living wage in the guidance so that the standard user will be able to be more aware on how the requirement should be audited.
28	Criteria 6.2	<p>Criteria 6.2 and Criteria 6.3:</p> <p>There is very little or no impact from splitting the criteria. If anything, it probably just creating more confusion due to too many additional changes from the previous standards.</p> <p>There is also no indication that the splitting of the of the criteria will improve clearer auditability. The requirement on work & living condition and living wage has already been separated in different indicator. Thus to further splitting it in different criteria has no impact and just creating more unnecessary additional criteria/indicator.</p> <p>In term of auditability, instead of working to splitting the criteria, it better to improve the definition of living wage in the guidance so that the standard user will be able to be more aware on how the requirement should be audited.</p> <p>More requirement/indicator does not always mean better improvement.</p>
29	Indicator 6.2.1	The indicator is not clear on how to make it available to the workers. Should make a reference on the language used by the workers.
30	Indicator 6.2.1	<p>Needs to require visits</p> <p>Feedback type: Implementability/Auditability</p>
31	Indicator 6.2.1	Recruitment procedures do not have to be available to workers. Procedures are available at the Unit of Certification and can be accessed by workers if needed.
32	Indicator 6.2.1	<p>Suggest to remove 'made available to workers' statement in the indicator. the aforesaid procedure are classified as high-level documents of HR and that may be too technical for workers to understand.</p> <p>Some of the terms in the procedure have been stated in their employment contract and can create redundancy to the UoC.</p>
33	Indicator 6.2.1	<p>Making the procedures available is not very practical. Instead a simplified procedures document can be shared.</p> <p>How do you audit their awareness?</p>

No	Criteria/Indicator	Comment (English)
34	Indicator 6.2.1	<p>Suggest to remove 'made available to workers' statement in the indicator. The aforesaid procedure are classified as high-level documents of HR and that may be too technical for workers to understand.</p> <p>Some of the terms in the procedure have been stated in their employment contract and can create redundancy to the UoC</p>
35	Indicator 6.2.1	<p>Suggest to remove 'made available to workers' statement in the indicator. The aforesaid procedure are classified as high-level documents of HR and that may be too technical for workers to understand.</p> <p>Some of the terms in the procedure have been stated in their employment contract and can create redundancy to the UoC</p>
36	Indicator 6.2.1	<p>Proposed changes to criteria 6.2: In the criteria sentence, the term minimum is simply removed. So the proposed sentence is Working and living conditions for all Workers must meet legal or industrial standards that meet decent living standards.</p> <p>Argument: The minimum diction in the criteria sentence 6.2 is seen as having multiple interpretations because in some perspectives the term minimum can mean below the provisions of the law or beyond the law. In practice, the term minimum will encourage the tendency of certification units to fulfill at the lowest level. In addition, in our input we added the sentence "that meets decent living standards" because this term decent living standards is very important as promoted by the ILO.</p>
37	Indicator 6.2.1	Replace "socialize" with "communicated"
38	Indicator 6.2.1	The procedures shall be documented, socialized and made available to all workers. as the procedure is HR oriented and most probably in BM/English should we not avoid making it available to workers- instead the focus should be on socializing where the workers awareness of the SOP is evaluated.
39	Indicator 6.2.1	The statement "made available to all workers" should be further clarified. For example, would it be enough to keep it in the office for the worker to refer when needed, or maybe display it at the notice board, or is it compulsory to provide a copy of it to every worker. What is the actual expectation of the requirement
40	Indicator 6.2.2	Does the contract also apply to the casual workers?
41	Indicator 6.2.2	Why is it the responsibilities of UoC to obtain acknowledgement from the worker? Should be the UoC to proof this
42	Indicator 6.2.2	On the (D) point, propose to remove beyond the first sentence, "there shall be no contract substitution"
43	Indicator 6.2.2	There are 3rd parties who the workers may sign with. This is allowed under the law of Gabon. The indicator does not allow for this even though it is legal in Gabon.
44	Indicator 6.2.2	Should include transmigrant workers
45	Indicator 6.2.2	<p>To remove 'acquire acknowledgment from the workers regarding their understanding of the terms and conditions of employment' in point (b) from the indicator.</p> <p>By signing the contract can indicates that the workers have understand of the terms & conditions stated in the contract.</p> <p>Acquiring another acknowledgement from the workers on their understanding creates redundancy as the acknowledgement have been collected upon workers signing the contract.</p>

No	Criteria/Indicator	Comment (English)
46	Indicator 6.2.2	Payments for workers need to be in line with a living wage! (please, also see: https://globallivingwage.org/) Calculating prevailing wages annually is not enough.
47	Indicator 6.2.2	The wording in item B should be reviewed, in terms of "will collect" and also stipulate and clarify the evidence required to demonstrate the understanding on the part of the workers, taking into account that it is not only the signing of a contract.
48	Indicator 6.2.2	- revert to Draft 3
49	Indicator 6.2.2	The repatriation should be clarified to apply to internal migrant workers as well
50	Indicator 6.2.2	To remove 'acquire acknowledgment from the workers regarding their understanding of the terms and conditions of employment' in point (b) from the indicator. By signing the contract can indicates that the workers have understand of the terms & conditions stated in the contract. Acquiring another acknowledgement from the workers on their understanding creates redundancy as the acknowledgement have been collected upon workers signing the contract
51	Indicator 6.2.2	To remove 'acquire acknowledgment from the workers regarding their understanding of the terms and conditions of employment' in point (b) from the indicator. By signing the contract can indicates that the workers have understand of the terms & conditions stated in the contract. Acquiring another acknowledgement from the workers on their understanding creates redundancy as the acknowledgement have been collected upon workers signing the contract
52	Indicator 6.2.2	Suggested revision: c. A copy of the employment contract shall be given to the Workers in a language they can understand.
53	Indicator 6.2.2	The UOC shall acquire acknowledgment from the workers regarding their understanding of the terms and conditions of employment., this is very subjective and may cause lack of clarity during audit. Acknowledgement in the form signing the employment contract or training records should not be considered as workers have understood the content/T&C. or used as defense when workers still claim not clear about their T&C

No	Criteria/Indicator	Comment (English)
54	Indicator 6.2.2	<p>- Point a, the sentence "Terms and conditions must include wages, regular working hours, salary deductions, overtime, sick leave, leave rights, maternity leave, reasons for dismissal, severance pay (if any), and notice of termination of employment" needs to be deleted.</p> <p>The narrative of point a is changed to "The employment contract must regulate the terms and conditions of employment in accordance with national legal requirements, Company Regulations, and Collective Labor Agreements (CLA) (if applicable)".</p> <p>- Point b needs to be deleted for the sentence "The Unit of Certification must obtain recognition from workers regarding their understanding of the terms and conditions of employment". The narrative of point b is changed to "The terms and conditions of the employment contract, Company Regulations or CLA, along with labor laws, must be available and explained to workers in a language that workers understand before signing the contract. The certification unit receives a receipt stating that workers understand the terms and conditions of employment".</p> <p>- Point d is changed so that the narrative becomes "Changes to the contract are not permitted. Worker consent must be obtained before changes to the employment contract are made. This does not include the terms and conditions in the Company Regulations or CLA, if applicable."</p>
55	Indicator 6.2.2	<p>Propose to change:</p> <p>- Point a, the sentence "Terms and conditions must include wages, regular working hours, salary deductions, overtime, sick leave, leave rights, maternity leave, reasons for dismissal, severance pay (if any), and notice of termination of employment" needs to be deleted.</p> <p>The narrative of point a is changed to "The employment contract must regulate the terms and conditions of employment in accordance with national legal requirements, Company Regulations, and Collective Labor Agreements (CLA) (if applicable)".</p> <p>- Point b needs to be deleted for the sentence "The Unit of Certification must obtain recognition from workers regarding their understanding of the terms and conditions of employment". The narrative of point b is changed to "The terms and conditions of the employment contract, Company Regulations or CLA, along with labor laws, must be available and explained to workers in a language that workers understand before signing the contract. The certification unit receives a receipt stating that workers understand the terms and conditions of employment".</p>

No	Criteria/Indicator	Comment (English)
56	Indicator 6.2.2	<p>Propose to change:</p> <ul style="list-style-type: none"> - Point a, the sentence "Terms and conditions must include wages, regular working hours, salary deductions, overtime, sick leave, leave rights, maternity leave, reasons for dismissal, severance pay (if any), and notice of termination of employment" needs to be deleted. <p>The narrative of point a is changed to "The employment contract must regulate the terms and conditions of employment in accordance with national legal requirements, Company Regulations, and Collective Labor Agreements (CLA) (if applicable)".</p> <ul style="list-style-type: none"> - Point b needs to be deleted for the sentence "The Unit of Certification must obtain recognition from workers regarding their understanding of the terms and conditions of employment". <p>The narrative of point b is changed to "The terms and conditions of the employment contract, Company Regulations or CLA, along with labor laws, must be available and explained to workers in a language that workers understand before signing the contract. The certification unit receives a receipt stating that workers understand the terms and conditions of employment".</p>
57	Indicator 6.2.2	<p>Propose to change:</p> <ul style="list-style-type: none"> - Point a, the sentence "Terms and conditions must include wages, regular working hours, salary deductions, overtime, sick leave, leave rights, maternity leave, reasons for dismissal, severance pay (if any), and notice of termination of employment" needs to be deleted. <p>The narrative of point a is changed to "The employment contract must regulate the terms and conditions of employment in accordance with national legal requirements, Company Regulations, and Collective Labor Agreements (CLA) (if applicable)".</p> <ul style="list-style-type: none"> - Point b needs to be deleted for the sentence "The Unit of Certification must obtain recognition from workers regarding their understanding of the terms and conditions of employment". <p>The narrative of point b is changed to "The terms and conditions of the employment contract, Company Regulations or CLA, along with labor laws, must be available and explained to workers in a language that workers understand before signing the contract. The certification unit receives a receipt stating that workers understand the terms and conditions of employment".</p>

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58	Indicator 6.2.2	<p>Propose to change:</p> <ul style="list-style-type: none"> - Point a, the sentence "Terms and conditions must include wages, regular working hours, salary deductions, overtime, sick leave, leave rights, maternity leave, reasons for dismissal, severance pay (if any), and notice of termination of employment" needs to be deleted. <p>The narrative of point a is changed to "The employment contract must regulate the terms and conditions of employment in accordance with national legal requirements, Company Regulations, and Collective Labor Agreements (CLA) (if applicable)".</p> <ul style="list-style-type: none"> - Point b needs to be deleted for the sentence "The Unit of Certification must obtain recognition from workers regarding their understanding of the terms and conditions of employment". <p>The narrative of point b is changed to "The terms and conditions of the employment contract, Company Regulations or CLA, along with labor laws, must be available and explained to workers in a language that workers understand before signing the contract. The certification unit receives a receipt stating that workers understand the terms and conditions of employment".</p>
59	Indicator 6.2.2	<p>Propose to change:</p> <ul style="list-style-type: none"> - Point a, the sentence "Terms and conditions must include wages, regular working hours, salary deductions, overtime, sick leave, leave rights, maternity leave, reasons for dismissal, severance pay (if any), and notice of termination of employment" needs to be deleted. <p>The narrative of point a is changed to "The employment contract must regulate the terms and conditions of employment in accordance with national legal requirements, Company Regulations, and Collective Labor Agreements (CLA) (if applicable)".</p> <ul style="list-style-type: none"> - Point b needs to be deleted for the sentence "The Unit of Certification must obtain recognition from workers regarding their understanding of the terms and conditions of employment". <p>The narrative of point b is changed to "The terms and conditions of the employment contract, Company Regulations or CLA, along with labor laws, must be available and explained to workers in a language that workers understand before signing the contract. The certification unit receives a receipt stating that workers understand the terms and conditions of employment".</p>

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60	Indicator 6.2.2	<p>Propose to change:</p> <ul style="list-style-type: none"> - Point a, the sentence "Terms and conditions must include wages, regular working hours, salary deductions, overtime, sick leave, leave rights, maternity leave, reasons for dismissal, severance pay (if any), and notice of termination of employment" needs to be deleted. <p>The narrative of point a is changed to "The employment contract must regulate the terms and conditions of employment in accordance with national legal requirements, Company Regulations, and Collective Labor Agreements (CLA) (if applicable)".</p> <ul style="list-style-type: none"> - Point b needs to be deleted for the sentence "The Unit of Certification must obtain recognition from workers regarding their understanding of the terms and conditions of employment". <p>The narrative of point b is changed to "The terms and conditions of the employment contract, Company Regulations or CLA, along with labor laws, must be available and explained to workers in a language that workers understand before signing the contract. The certification unit receives a receipt stating that workers understand the terms and conditions of employment".</p>
61	Indicator 6.2.2	<p>Propose to change:</p> <ul style="list-style-type: none"> - Point a, the sentence "Terms and conditions must include wages, regular working hours, salary deductions, overtime, sick leave, leave rights, maternity leave, reasons for dismissal, severance pay (if any), and notice of termination of employment" needs to be deleted. <p>The narrative of point a is changed to "The employment contract must regulate the terms and conditions of employment in accordance with national legal requirements, Company Regulations, and Collective Labor Agreements (CLA) (if applicable)".</p> <ul style="list-style-type: none"> - Point b needs to be deleted for the sentence "The Unit of Certification must obtain recognition from workers regarding their understanding of the terms and conditions of employment". <p>The narrative of point b is changed to "The terms and conditions of the employment contract, Company Regulations or CLA, along with labor laws, must be available and explained to workers in a language that workers understand before signing the contract. The certification unit receives a receipt stating that workers understand the terms and conditions of employment".</p>

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62	Indicator 6.2.2	<p>Propose to change:</p> <ul style="list-style-type: none"> - Point a, the sentence "Terms and conditions must include wages, regular working hours, salary deductions, overtime, sick leave, leave rights, maternity leave, reasons for dismissal, severance pay (if any), and notice of termination of employment" needs to be deleted. <p>The narrative of point a is changed to "The employment contract must regulate the terms and conditions of employment in accordance with national legal requirements, Company Regulations, and Collective Labor Agreements (CLA) (if applicable)".</p> <ul style="list-style-type: none"> - Point b needs to be deleted for the sentence "The Unit of Certification must obtain recognition from workers regarding their understanding of the terms and conditions of employment". <p>The narrative of point b is changed to "The terms and conditions of the employment contract, Company Regulations or CLA, along with labor laws, must be available and explained to workers in a language that workers understand before signing the contract. The certification unit receives a receipt stating that workers understand the terms and conditions of employment".</p>
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64	Indicator 6.2.2	<p>Propose to change:</p> <ul style="list-style-type: none"> - Point a, the sentence "Terms and conditions must include wages, regular working hours, salary deductions, overtime, sick leave, leave rights, maternity leave, reasons for dismissal, severance pay (if any), and notice of termination of employment" needs to be deleted. <p>The narrative of point a is changed to "The employment contract must regulate the terms and conditions of employment in accordance with national legal requirements, Company Regulations, and Collective Labor Agreements (CLA) (if applicable)".</p> <ul style="list-style-type: none"> - Point b needs to be deleted for the sentence "The Unit of Certification must obtain recognition from workers regarding their understanding of the terms and conditions of employment". <p>The narrative of point b is changed to "The terms and conditions of the employment contract, Company Regulations or CLA, along with labor laws, must be available and explained to workers in a language that workers understand before signing the contract. The certification unit receives a receipt stating that workers understand the terms and conditions of employment".</p>
65	Indicator 6.2.2	<p>6.2.2 Add that all workers must have "written" contracts</p>
66	Indicator 6.2.2	<p>Propose to change:</p> <ul style="list-style-type: none"> - Point a, the sentence "Terms and conditions must include wages, regular working hours, salary deductions, overtime, sick leave, leave rights, maternity leave, reasons for dismissal, severance pay (if any), and notice of termination of employment" needs to be deleted. <p>The narrative of point a is changed to "The employment contract must regulate the terms and conditions of employment in accordance with national legal requirements, Company Regulations, and Collective Labor Agreements (CLA) (if applicable)".</p> <ul style="list-style-type: none"> - Point b needs to be deleted for the sentence "The Unit of Certification must obtain recognition from workers regarding their understanding of the terms and conditions of employment". <p>The narrative of point b is changed to "The terms and conditions of the employment contract, Company Regulations or CLA, along with labor laws, must be available and explained to workers in a language that workers understand before signing the contract. The certification unit receives a receipt stating that workers understand the terms and conditions of employment".</p>

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67	Indicator 6.2.2	<p>Propose to change:</p> <ul style="list-style-type: none"> - Point a, the sentence "Terms and conditions must include wages, regular working hours, salary deductions, overtime, sick leave, leave rights, maternity leave, reasons for dismissal, severance pay (if any), and notice of termination of employment" needs to be deleted. <p>The narrative of point a is changed to "The employment contract must regulate the terms and conditions of employment in accordance with national legal requirements, Company Regulations, and Collective Labor Agreements (CLA) (if applicable)".</p> <ul style="list-style-type: none"> - Point b needs to be deleted for the sentence "The Unit of Certification must obtain recognition from workers regarding their understanding of the terms and conditions of employment". <p>The narrative of point b is changed to "The terms and conditions of the employment contract, Company Regulations or CLA, along with labor laws, must be available and explained to workers in a language that workers understand before signing the contract. The certification unit receives a receipt stating that workers understand the terms and conditions of employment".</p>
68	Indicator 6.2.2	<p>Propose to change:</p> <ul style="list-style-type: none"> - Point a, the sentence "Terms and conditions must include wages, regular working hours, salary deductions, overtime, sick leave, leave rights, maternity leave, reasons for dismissal, severance pay (if any), and notice of termination of employment" needs to be deleted. <p>The narrative of point a is changed to "The employment contract must regulate the terms and conditions of employment in accordance with national legal requirements, Company Regulations, and Collective Labor Agreements (CLA) (if applicable)".</p> <ul style="list-style-type: none"> - Point b needs to be deleted for the sentence "The Unit of Certification must obtain recognition from workers regarding their understanding of the terms and conditions of employment". <p>The narrative of point b is changed to "The terms and conditions of the employment contract, Company Regulations or CLA, along with labor laws, must be available and explained to workers in a language that workers understand before signing the contract. The certification unit receives a receipt stating that workers understand the terms and conditions of employment".</p>
69	Indicator 6.2.2	6.2.2 Add that all workers must have "written" contracts

No	Criteria/Indicator	Comment (English)
70	Indicator 6.2.2	<p>Propose to change:</p> <ul style="list-style-type: none"> - Point a, the sentence "Terms and conditions must include wages, regular working hours, salary deductions, overtime, sick leave, leave rights, maternity leave, reasons for dismissal, severance pay (if any), and notice of termination of employment" needs to be deleted. <p>The narrative of point a is changed to "The employment contract must regulate the terms and conditions of employment in accordance with national legal requirements, Company Regulations, and Collective Labor Agreements (CLA) (if applicable)".</p> <ul style="list-style-type: none"> - Point b needs to be deleted for the sentence "The Unit of Certification must obtain recognition from workers regarding their understanding of the terms and conditions of employment". <p>The narrative of point b is changed to "The terms and conditions of the employment contract, Company Regulations or CLA, along with labor laws, must be available and explained to workers in a language that workers understand before signing the contract. The certification unit receives a receipt stating that workers understand the terms and conditions of employment".</p>
71	Indicator 6.2.2	To define and determine the notice period for dismissal. Terms and conditions in accordance with national legislation.
72	Indicator 6.2.2	Notice period for dismissal, define and determine the period or in accordance with the legal compliance of each country, the terms and conditions in accordance with national legislation.
73	Indicator 6.2.3	Clarify case of sub-contracting - it is not clear
74	Indicator 6.2.3	Suggest to make it more inclusive to the transmigrant workers. Guideline on hiring immigrant workers.
75	Indicator 6.2.3	<p>Comments on the 'International Migrant Workers' terms used in the indicator as the scenario could be the same if the workers are internally migrating within the country.</p> <p>Some of the big countries speaks in a different language / dialect in the different region within the country.</p>
76	Indicator 6.2.3	Question on how to verify. The indicator should be changed from "internal migrants" to "migrants" to make it applicable to internal migrants. This could also be a challenge in Sabah with the stateless people- typically some companies do conditional employment contracts. Something to raise at the MYNI
77	Indicator 6.2.3	As defined in the tab "Terms & Definitions", a migrant worker may have moved from one country to another (international migrant) to work. If the UoC hires the migrant worker when they are already in the country of work, how can the UoC sign the contract with the work back in the country of origin ? Is the indicator referring to hiring of "foreign workers" instead ?
78	Indicator 6.2.3	I agree with the intent, it will be difficult to audit.
79	Indicator 6.2.3	The requirement to sign at country for hire should not be applicable to workers under RTK/recalibration from Indonesia and Philippines . However should be considered for workers from different region (e.g Indonesia/PNG) employed through agents to work in another region.
80	Indicator 6.2.4	Revoke up to date only maintain data for 5 years unless stated by NI
81	Indicator 6.2.4	Asking for justification on the five year period
82	Indicator 6.2.4	More elaboration needed to ensure that the recruitment fees are reimbursed within 5 years

No	Criteria/Indicator	Comment (English)
83	Indicator 6.2.4	Data maintain for 5 years ahead from the time of registration (or determined by NI) that applied in November 2025
84	Indicator 6.2.4	Asking for assurance which regulation should the growers adhere to? NI or P&C or national regulation when it comes to the restriction of the requirement?
85	Indicator 6.2.4	Refer back to Draft 3 as no time line mentioned
86	Indicator 6.2.4	On applicability part the maintain of hardcopy file for 5 years is not applicable in practice as could be hundred of blue collar workers resign daily.
87	Indicator 6.2.4	There are personal data privacy laws (in Cote'd'ivor) that may make implementing this challenging. More clarity of this is needed
88	Indicator 6.2.4	precision on term 'next of kin' - guideline
89	Indicator 6.2.4	How to register the next-of-kin update after 5 years
90	Indicator 6.2.4	- Workers who have resigned no longer have any relationship with the company, it will be difficult to communicate with the person concerned and his/her updated family to obtain the latest data (the sentence "latest information" is proposed to be removed). - The 5-year storage limit needs to be changed, just adjust it to the company's internal document storage procedure.
91	Indicator 6.2.4	Why is there a five-year retention of workers' family contacts after they leave work?
92	Indicator 6.2.4	Recommend that documentation of a worker's immediate family be stored for less than 5 years from the time of the worker's resignation or termination of employment.
93	Indicator 6.2.4	It is difficult to obtain the latest information on the telephone number of the family who has resigned up to 5 years since the resignation because the certification unit has not communicated with the worker anymore. It is recommended that this indicator is sufficient to ensure that the certification unit stores the worker's data and family telephone number from the time of resignation until the payment process for his/her rights is completed.
94	Indicator 6.2.4	6.2.4 - It's difficult to "up to date next of kin contact information" for up to 5 years from the date of workers' resignation or termination of employment since the UoC doesn't have any relations with the worker again. Sustain 6.7.4 Draft 3
95	Indicator 6.2.4	The draft requires the UoC to retain a list of workers and their next of kin contact information for five years post-employment. This requirement is impractical due to the potential burden of managing and storing this data, especially in times of high employee turnover. In addition, national regulations usually stipulate that once the employment period ends and all obligations are met, the company's involvement with the former employee ends. Given that most of our workers are also local workers, not migrant workers.
96	Indicator 6.2.4	Suggest removing 'up-to-date' in reference to workers who have resigned or been terminated from the indicator. Concerns on the challenge to obtain the up-to-date of the workers who left from company. Create unnecessary works for UoC to update the information of the former workers that left the company.
97	Indicator 6.2.4	To remove "for up to five years from the date of workers' resignation or termination of employment." - revert to Draft 3
98	Indicator 6.2.4	Remove "up-to-date". Recommendation to move this back to 6.7 and keep the focus on reimbursement. Scoping of active workers

No	Criteria/Indicator	Comment (English)
99	Indicator 6.2.4	During IGC consultation discussion, one grower gave the example of an ex-employee's next-of-kin asking for employment records for insurance purposes. They also cited Indonesia's 2-year limitation period for employment claims.
100	Indicator 6.2.4	Suggest removing 'up-to-date' in reference to workers who have resigned or been terminated from the indicator. Concerns on the challenge to obtain the up-to-date of the workers who left from company. Create unnecessary works for UoC to update the information of the former workers that left the company.
101	Indicator 6.2.4	Suggest removing 'up-to-date' in reference to workers who have resigned or been terminated from the indicator. Concerns on the challenge to obtain the up-to-date of the workers who left from company. Create unnecessary works for UoC to update the information of the former workers that left the company.
102	Indicator 6.2.4	It might be difficult for UoC to maintain up-to-date next of kin contact information for up to five years after a worker's resignation or termination of contract
103	Indicator 6.2.4	Proposed change to indicator 6.2.4: The Unit of Certification must maintain an updated list of workers and family contact information, for up to five years from the date of resignation or termination. Data related to termination of employment that has the potential to result in industrial relations disputes must be accessible to relevant stakeholders or related parties. Argument: Some industrial relations disputes take a long time, for example more than 5 years, and in the process of the dispute the related parties have the right to access the data.
104	Indicator 6.2.4	We engage workers on short term contracts (less than 6 months). Having data on their next-of-kin for just few months of work would be problematic on storage capacity. In my opinion, next-of-kin data should only be kept for long-term contract.s
105	Indicator 6.2.4	Impossible to audit and implement.
106	Indicator 6.2.4	It is understandable that employee information must be stored for an estimated time, but it does not make sense to store the information of close relatives after the employment relationship has ended.
107	Indicator 6.2.4	The Unit of Certification shall maintain a worker register and up-to-date next of kin contact information, for up to five years from the date of workers' resignation or termination of employment. this is not practical to maintain "updated" details of those who no longer works with the organization. and how would auditor verify this . was made to understand that the intent was for reimbursement so it should be parked in that particular requirement to be more relevant
108	Indicator 6.2.4	Propose that five years be changed to two years so that the narrative changes to "The Unit of Certification must maintain a list of workers and the latest contact information of their closest family members, for up to two years since the resignation or termination of the relevant worker."
109	Indicator 6.2.4	6.2.4 - Information on the next of kin is not always available, as some workers have no family members to contact. We suggest to add, 'where applicable'

No	Criteria/Indicator	Comment (English)
110	Indicator 6.2.4	Suggest to change the duration of data storage from 5 years to 2 years. This aligns with document storage requirements for the supply chain requirement as well as national regulations.
111	Indicator 6.2.4	Propose that this indicator be removed, because there is no longer an employment relationship between the company and the resigning worker.
112	Indicator 6.2.4	Propose that this indicator be removed, because there is no longer an employment relationship between the company and the resigning worker.
113	Indicator 6.2.4	Propose that this indicator be removed, because there is no longer an employment relationship between the company and the resigning worker.
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115	Indicator 6.2.4	Propose that this indicator be removed, because there is no longer an employment relationship between the company and the resigning worker.
116	Indicator 6.2.4	Propose that this indicator be removed, because there is no longer an employment relationship between the company and the resigning worker.
117	Indicator 6.2.4	Workers registration is valid to keep by grower for 5 years, but the next of kin information keep for 5 years after the resignation/termination is not suitable in this criteria. it should maintain to keep it under 6.7 because the only reason to keep only related to the insurance/ claim etc to next of kin.
118	Indicator 6.2.4	<p>Indicator 6.2.4.</p> <p>It's difficult to "up to date next of kin contact information" for up to 5 years from the date of workers' resignation or termination of employment since the UoC doesn't have any relations with the worker again. It's suggested to use draft 3:</p> <p>6.7.4 The Unit of Certification shall maintain a record of Workers and next of kin contact information if the employment is terminated by either party prior to the UoC's reimbursement process.</p> <p>Request to define the provision based on the prevailing national regulations. UU 13/2003, Pasal 96: Tuntutan pembayaran upah pekerja/buruh dan segala pembayaran yang timbul dari hubungan kerja menjadi kadaluwarsa setelah melampaui jangka waktu 2 (dua) tahun sejak timbulnya hak. Law No. 13/2003, Article 96: Claims for the payment of wages and all payments arising from the employment relationship become invalid after a period of 2 (two) years from the date the right arises.</p>
119	Indicator 6.2.4	Propose that this indicator be removed, because there is no longer an employment relationship between the company and the resigning worker.
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121	Indicator 6.2.4	Propose that this indicator be removed, because there is no longer an employment relationship between the company and the resigning worker.
122	Indicator 6.2.4	Propose that this indicator be removed, because there is no longer an employment relationship between the company and the resigning worker.

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123	Indicator 6.2.4	<p>Can't see the relevance and implementability of the need to keep an up-to-date record of the next of kin contact information up to 5 years of termination / resignation of the employment.</p> <p>It is very hard to keep track of the workers after they finished their employment with the company, let alone to keep up with their next of kin information. It is even more impractical to do this for up to 5 years after their employment ended.</p> <p>In term of its auditability, this indicator is better suited to be kept in Criteria 6.7 as it relates to medical insurance payment / reimbursement, instead of moving it into the Criteria 6.2 which talk about "working" pay and condition</p>
124	Indicator 6.2.4	<p>6.2.4 It's difficult to "up to date next of kin contact information" for up to 5 years from the date of workers' resignation or termination of employment since the UoC doesn't have any relations with the worker again. It's suggested to use draft 3: 6.7.4 The Unit of Certification shall maintain a record of Workers and next of kin contact information if the employment is terminated by either party prior to the UoC's reimbursement process.</p> <p>Request to define the provision based on the prevailing national regulations. UU 13/2003, Pasal 96: Tuntutan pembayaran upah pekerja/buruh dan segala pembayaran yang timbul dari hubungan kerja menjadi kadaluwarsa setelah melampaui jangka waktu 2 (dua) tahun sejak timbulnya hak. Law No. 13/2003, Article 96: Claims for the payment of wages and all payments arising from the employment relationship become invalid after a period of 2 (two) years from the date the right arises.</p>
125	Indicator 6.2.4	<p>Propose that this indicator be removed, because there is no longer an employment relationship between the company and the resigning worker.</p>
126	Indicator 6.2.4	<p>It's difficult to "up to date next of kin contact information" for up to 5 years from the date of workers' resignation or termination of employment since the UoC doesn't have any relations with the worker again. It's suggested to use draft 3: 6.7.4 The Unit of Certification shall maintain a record of Workers and next of kin contact information if the employment is terminated by either party prior to the UoC's reimbursement process.</p> <p>Request to define the provision based on the prevailing national regulations. UU 13/2003, Pasal 96: Tuntutan pembayaran upah pekerja/buruh dan segala pembayaran yang timbul dari hubungan kerja menjadi kadaluwarsa setelah melampaui jangka waktu 2 (dua) tahun sejak timbulnya hak. Law No. 13/2003, Article 96: Claims for the payment of wages and all payments arising from the employment relationship become invalid after a period of 2 (two) years from the date the right arises.</p>

No	Criteria/Indicator	Comment (English)
127	Indicator 6.2.4	<p>Indicator 6.2.4 :</p> <p>Updating and maintaining current next of kin contact information for the entire five-year period can be challenging, particularly since the Unit of Certification may no longer have ongoing contact with the former employee.</p> <p>According to Law No. 13/2003, Article 96, claims for the payment of wages and other payments arising from the employment relationship become invalid after two years from the date the right arises. Therefore, it is advisable to align with national regulations concerning the record-keeping period.</p> <p>To effectively address potential issues that may arise after a worker resigns, it would be prudent for the Unit of Certification to establish a clear procedure for managing such situations. This procedure should ensure that all claims and communications are handled within the two-year timeframe specified by law, while also considering the practical challenges of maintaining up-to-date next of kin information.</p>
128	Indicator 6.2.4	The period must be while the employee is working.
129	Indicator 6.2.4	The period for registering employee information must be while the employee is still working, not after the termination of the employment relationship.
130	Indicator 6.2.5	go back to Draft 3 and NI to determine the times
131	Indicator 6.2.5	Why are we giving the option for the worker to be hired for longer contract term when the goal for permanent contract is desirable?
132	Indicator 6.2.5	There might be some casual workers who prefers not being hired as permanent. How to show proof that the workers are given opportunity to get the permanent job offer?
133	Indicator 6.2.5	There are smallholders with oil palm plot who also works for a growers in a permanent position. How is that going to affect the audit process for this situation?
134	Indicator 6.2.5	How is the proposal for the 'three consecutive months' brought up?
135	Indicator 6.2.5	For giving opportunity to have longer term contracts, is 6 months considered as a long term contract?
136	Indicator 6.2.5	What basis is the 3 months on contract period for casual and short term workers? Suggest to refer to National labour code as each country may have different period applied.
137	Indicator 6.2.5	What is the basic of the new classification of workers? In Cote D'ivoire temporary workers can be different . I don't understand why it is 3 months ?
138	Indicator 6.2.5	Regarding the appointment of workers, the status of workers is adjusted to the regulations of a country (if any), because for this matter, the country, especially Indonesia, has regulated in detail regarding the status of these workers (BHL, KHT, PKWT, permanent and their mechanisms).
139	Indicator 6.2.5	follow the regulations of each country regarding employment
140	Indicator 6.2.5	It should be three consecutive times (based on contract). In Indonesia, the Government has issued the regulations regarding this matter. It's suggested to use Draft 3 – 6.2.7 and let the National Interpretation define the provision for this matter.

No	Criteria/Indicator	Comment (English)
141	Indicator 6.2.5	Suggest RSPO to define the term 'permanent in nature' for auditability and clarity. The definition of 'permanent in nature' should be more lenient as the work's nature may be varied for certain UoC. The 'longer term' mentioned in the indicator. How long can be considered 'longer term' for the contracts offered for casual workers?
142	Indicator 6.2.5	Suggest to remove 'permanent employment' as the context for casual and short-term workers who were hired based on exceptional circumstances (for a short time / ad-hoc basis).
143	Indicator 6.2.5	Please re-include: "The offer made shall be documented."
144	Indicator 6.2.5	It is not possible to stipulate in an indicator a periodicity for the worker to be granted a permanence, since on many occasions workers are hired through fixed-term contracts of more than 3 months that do not necessarily become permanent contracts, according to many conditions such as: type of work, peak harvest, probationary periods, etc.
145	Indicator 6.2.5	Should include "NI" in this indicator
146	Indicator 6.2.5	Prefer core work
147	Indicator 6.2.5	Suggest to define 'permanent in nature' for auditability and clarity. The definition for 'permanent in nature' should be more lenient as the work's nature may be varied for certain UoC. Question on the 'longer term' mention in the indicator. How long can be considered 'longer term' for the contracts offered for casual workers. Suggest to remove 'permanent employment' as the context for casual and short-term workers were hired based on exceptional circumstances (for a short time) / ad-hoc basis.
148	Indicator 6.2.5	Does "work that is permanent in nature" refer to non-plantation activities and ancillary work?
149	Indicator 6.2.5	Suggest to define 'permanent in nature' for auditability and clarity. The definition for 'permanent in nature' should be more lenient as the work's nature may be varied for certain UoC. Question on the 'longer term' mention in the indicator. How long can be considered 'longer term' for the contracts offered for casual workers. Suggest to remove 'permanent employment' as the context for casual and short-term workers were hired based on exceptional circumstances (for a short time) / ad-hoc basis.
150	Indicator 6.2.5	There is a clear definition of casual workers in the Ghana Labour Law Act 651 which defers from the definition provided by RSPO.

No	Criteria/Indicator	Comment (English)
151	Indicator 6.2.5	<p>Opposite Indicator 6.2.5 Casual and short-term workers who are employed for more than three consecutive months and perform work that is permanent in nature will be given the opportunity, depending on workforce planning, for longer-term contracts or permanent employment.</p> <p>In relation to the proposed RSPO definition</p> <p>Persons performing paid work.</p> <p>Permanent workers: Workers with an ongoing employment relationship with the Certification Unit and who (do not have a predetermined end date) for their employment.</p> <p>Comment:</p> <p>In Colombia there are permanent workers with a predetermined date such as fixed term contracts, it is important to specify that the definition in the definition proposal would contradict the regulations applied in Colombia. Proposal for the definition. Permanent workers: Workers with an ongoing and continuous labor relationship with the Certification Unit.</p>
152	Indicator 6.2.5	<p>Offering permanent employment to temporary or occasional workers is not economically viable since they were hired for a temporary activity that does not require a permanent worker. This would increase the payroll, making salary payments for positions that the company does not require.</p>
153	Indicator 6.2.5	<p>Proposed to change the word "Planning" to "Need" narrative changed to "Casual and short-term workers employed for more than three consecutive months and performing work of a permanent nature should be given the opportunity, based on workforce needs, to obtain a longer-term contract or permanent worker status".</p> <p>Propose for Compliance requirement point D (Permanent contract offers made to individual workers must be documented) to be removed</p>
154	Indicator 6.2.5	<p>6.2.5 - In some countries this is defined by the law, so we suggest adding that where national regulations exist, these must be taken into account. Further, this indicator requires clarity on contract workers. Many seasonal tasks are done by workers employed by contractors, so reading this indicator, this does not fall under the scope here. Also, the term 'longer term contracts' is vague. What is the cut-off of a longer-term contract?</p>
155	Indicator 6.2.5	<p>Proposed to change the word "Planning" to "Need" narrative changed to "Casual and short-term workers employed for more than three consecutive months and performing work of a permanent nature should be given the opportunity, based on workforce needs, to obtain a longer-term contract or permanent worker status".</p> <p>Propose for Compliance requirement point D (Permanent contract offers made to individual workers must be documented) to be removed</p>

No	Criteria/Indicator	Comment (English)
156	Indicator 6.2.5	<p>Proposed to change the word "Planning" to "Need" narrative changed to "Casual and short-term workers employed for more than three consecutive months and performing work of a permanent nature should be given the opportunity, based on workforce needs, to obtain a longer-term contract or permanent worker status".</p> <p>Propose for Compliance requirement point D (Permanent contract offers made to individual workers must be documented) to be removed</p>
157	Indicator 6.2.5	<p>Proposed to change the word "Planning" to "Need" narrative changed to "Casual and short-term workers employed for more than three consecutive months and performing work of a permanent nature should be given the opportunity, based on workforce needs, to obtain a longer-term contract or permanent worker status".</p> <p>Propose for Compliance requirement point D (Permanent contract offers made to individual workers must be documented) to be removed</p>
158	Indicator 6.2.5	<p>Proposed to change the word "Planning" to "Need" narrative changed to "Casual and short-term workers employed for more than three consecutive months and performing work of a permanent nature should be given the opportunity, based on workforce needs, to obtain a longer-term contract or permanent worker status".</p> <p>Propose for Compliance requirement point D (Permanent contract offers made to individual workers must be documented) to be removed</p>
159	Indicator 6.2.5	<p>Proposed to change the word "Planning" to "Need" narrative changed to "Casual and short-term workers employed for more than three consecutive months and performing work of a permanent nature should be given the opportunity, based on workforce needs, to obtain a longer-term contract or permanent worker status".</p> <p>Propose for Compliance requirement point D (Permanent contract offers made to individual workers must be documented) to be removed</p>
160	Indicator 6.2.5	<p>Proposed to change the word "Planning" to "Need" narrative changed to "Casual and short-term workers employed for more than three consecutive months and performing work of a permanent nature should be given the opportunity, based on workforce needs, to obtain a longer-term contract or permanent worker status".</p> <p>Propose for Compliance requirement point D (Permanent contract offers made to individual workers must be documented) to be removed</p>
161	Indicator 6.2.5	<p>Indicator 6.2.5. Request to let the National Interpretation define the provision for this matter.</p>
162	Indicator 6.2.5	<p>Proposed to change the word "Planning" to "Need" narrative changed to "Casual and short-term workers employed for more than three consecutive months and performing work of a permanent nature should be given the opportunity, based on workforce needs, to obtain a longer-term contract or permanent worker status".</p> <p>Propose for Compliance requirement point D (Permanent contract offers made to individual workers must be documented) to be removed</p>

No	Criteria/Indicator	Comment (English)
163	Indicator 6.2.5	<p>Proposed to change the word "Planning" to "Need" narrative changed to "Casual and short-term workers employed for more than three consecutive months and performing work of a permanent nature should be given the opportunity, based on workforce needs, to obtain a longer-term contract or permanent worker status".</p> <p>Propose for Compliance requirement point D (Permanent contract offers made to individual workers must be documented) to be removed</p>
164	Indicator 6.2.5	<p>Proposed to change the word "Planning" to "Need" narrative changed to "Casual and short-term workers employed for more than three consecutive months and performing work of a permanent nature should be given the opportunity, based on workforce needs, to obtain a longer-term contract or permanent worker status".</p> <p>Propose for Compliance requirement point D (Permanent contract offers made to individual workers must be documented) to be removed</p>
165	Indicator 6.2.5	<p>Indicator 6.2.5 and Indicator 6.6.1</p> <p>Proposed to change the word "Planning" to "Need" narrative changed to "Casual and short-term workers employed for more than three consecutive months and performing work of a permanent nature should be given the opportunity, based on workforce needs, to obtain a longer-term contract or permanent worker status".</p> <p>Propose for Compliance requirement point D (Permanent contract offers made to individual workers must be documented) to be removed</p>
166	Indicator 6.2.5	<p>Proposed to change the word "Planning" to "Need" narrative changed to "Casual and short-term workers employed for more than three consecutive months and performing work of a permanent nature should be given the opportunity, based on workforce needs, to obtain a longer-term contract or permanent worker status".</p> <p>Propose for Compliance requirement point D (Permanent contract offers made to individual workers must be documented) to be removed</p>
167	Indicator 6.2.5	<p>Indicator 6.2.5 :</p> <p>It is proposed to follow the applicable national regulations (National Interpretation) to ensure that the company does not violate government regulations, considering that companies are required to carry out regular employment reporting to government employment services.</p>
168	Indicator 6.2.5	<p>Employment relationship by mutual agreement if possible. Depending on the crop cycle, leave it open "if possible"</p>
169	Indicator 6.2.5	<p>Does the wording 'depending on workforce planning' create a loophole to not offer longer term/permanent?</p> <p>Feedback type: Implementability/Auditability</p>
170	Indicator 6.2.6	<p>Ideally this indicator would be split in several indicators, there are multiple requirements here.</p>
171	Indicator 6.2.6	<p>6.2.6 - The addendum requires the day of payment to be on a payslip. The exact date of pay may be difficult to provide, as payments are done through banks, and may take some time to process. Therefore, we would recommend staying with the pay period.</p>

No	Criteria/Indicator	Comment (English)
172	Indicator 6.2.7	Suggest RSPO to define 'workplace injuries' in the indicator for point (d). Requirement for point (d) shall be put in the guidance part rather than putting it into the indicator. The pay terms of the workers specified in the employment contract as sick leave / hospitalization where they will be paid a full wage during their absence.
173	Indicator 6.2.7	To add in the statement of 'where there is no legal requirement or CBA are not available' in point (d) to avoid confusion with the practice in the Malaysia context.
174	Indicator 6.2.7	Define workplace injury and duration (worker could be injured and not able to work for a long period of time)
175	Indicator 6.2.7	Suggest to define 'workplace injuries' in the indicator for point (d). Requirement for point (d) shall be put in the guidance part rather than putting it into indicator. The pay terms of the workers specified in the employment contract as sick leave / hospitalization where they will be paid a full wage during their absence. To add in statement of 'where there is no legal requirement or CBA are not available' in point (d) to avoid confusion with the practice in Malaysia context
176	Indicator 6.2.7	We meeting on more than 10 labour unions to discuss about minimum wage. I think minimum wage only in Indonesia, you know, because we don't want the minimum wage in principle and criteria there. [...] because if there is minimum wage we cannot negotiate. ["if you set, you know, minimum wage in the standard. Then, you know, that's the wage that needs to be paid. And there's no discussion anymore." -- paraphrased by Suzan of CNV)
177	Indicator 6.2.7	unions should have the negotiation power to go above it [minimum wage] [...] we also need to think about how to recognize the the role of labor unions in negotiating wages as part of collective bargaining agreements
178	Indicator 6.2.7	How do you make criteria 6.3 really an incentive also for companies to progressively work towards this living wage? That's something I'm struggling with, whether minimum should be erased in 6.2.
179	Indicator 6.2.7	Work targets can be different depending on maturity, profile depending on area that they are in and whatnot. There has to be clarity on how companies practice it
180	Indicator 6.2.7	... Cba does allow non-performance to be utilized as a deduction.
181	Indicator 6.2.7	Suggest to define 'workplace injuries' in the indicator for point (d). Requirement for point (d) shall be put in the guidance part rather than putting it into indicator. The pay terms of the workers specified in the employment contract as sick leave / hospitalization where they will be paid a full wage during their absence. To add in statement of 'where there is no legal requirement or CBA are not available' in point (d) to avoid confusion with the practice in Malaysia context
182	Indicator 6.2.7	there is no such thing as minimum negotiated wage in a CBA, erase the word minimum here as it leads to confusion and refer to negotiated wage in a CBA.

No	Criteria/Indicator	Comment (English)
183	Indicator 6.2.7	In a), again there is no such thing as a CBA minimum wage. It is the negotiated wage (has nothing to do with minimum wage) The word minimum should be erased here
184	Indicator 6.2.7	In b), there should be no more piece rate work, piece rate work is an incentive for unpaid overhours and generally poor working conditions and lack of proper contracts. Casual workers without contract are now often paid via piece rate. All workers should be granted proper contracts with clear and legal amounts of working hours. Also calculating proportionally piece rate work based on legal minimum is asking for unclarity and problems
185	Indicator 6.2.7	Propose the narrative be changed to "All Workers must be paid at least the legal minimum wage or the minimum wage stipulated or agreed in the Work Agreement, Company Regulations or CLA, whichever is higher. Note the following. a. Performance bonus and overtime payments must not be calculated as part of the legal minimum wage or the minimum wage stipulated in the Work Agreement, Company Regulations or CLA. b. For piecework, wages must be based on the legal minimum wage rate or the wage rate stipulated in the Work Agreement, Company Regulations or CLA. If there is no legal minimum wage for piecework workers, then their wages must be calculated proportionally based on the legal minimum wage or that stipulated in the Work Agreement, Company Regulations or CLA, ensuring that work targets can be achieved within regular working hours. c. Overtime work must be paid according to the national legal rate or according to the rate in the Work Agreement, Company Regulations or CLA. If legal requirements, the Work Agreement, Company Regulations and CLA are not available, the overtime rate must not be less than 1.5 times the regular wage. d. If the working day is reduced due to an injury at work, a full day's wages must be paid to the affected Worker (regardless of the type of worker)."
186	Indicator 6.2.8	water that is safe to drink need a parameter. Need to be revised
187	Indicator 6.2.8	Is it mandatory for the UoC to provide housing?
188	Indicator 6.2.8	Drinkable water to be removed, just replace it with the phrase clean water. Because drinkable water can be assumed to be like bottled mineral water that can be drunk directly.
189	Indicator 6.2.8	water that is safe to drink to be changed to clean water
190	Indicator 6.2.8	a) It's suggested to use the term as stated in draft 3. b) RSPO needs to consult with ILO since this requirement refers to ILO documents.
191	Indicator 6.2.8	Suggest to redraft the statement for point (b) 'In the case of acquisitions of non-certified supply base, a time-bound plan (maximum 5 years) is developed detailing the upgrade of infrastructure and the plan shall be reviewed annually, where applicable..... The plan for the upgrading infrastructure is determined by the financial and other locality factors in the UoC and it may not be necessary for the UoC to review it annually, given that the progress of upgrading is following the time-bound plan developed earlier.
192	Indicator 6.2.8	Interpretation of b is that they only have to develop a plan. This can be seen as weaker.
193	Indicator 6.2.8	Does it mention access to education services, this is only in cases where the worker's family lives in the company's operations?

No	Criteria/Indicator	Comment (English)
194	Indicator 6.2.8	Item A should stipulate that the supply of drinking water is not only to be provided and given to workers living on plantations but for all workers. Make clear the benefits stipulated in the indicator, which apply only to workers who live on plantations or to the totality of the plantation.
195	Indicator 6.2.8	- Take out "education and welfare"
196	Indicator 6.2.8	Suggest to add "welfare amenities" in the definition listing for clarity
197	Indicator 6.2.8	Suggested revision: a. Accommodation provided for Workers living within the Unit of Certification shall include adequate and safe housing, sanitation facilities, water supplies (including water that is safe to drink) and access to medical, educational and welfare amenities. The facilities and amenities provided shall comply with applicable national and/or international law requirements.
198	Indicator 6.2.8	This is very weak, the indicator should have clear requirements for housing. Minimum requirements on living space, washing and cooking facilities. IN the current format the standard will not improve the living conditions of the workers.
199	Indicator 6.2.8	In c), make reference to WHO housing and health guidelines
200	Indicator 6.2.8	- Propose to change "water supply (including water that is safe for drinking)" in point A according to P&C 2018 to "clean water supply" - change "and/or" to "or" in the sentence must meet the requirements of applicable national or international law". The narrative of point A becomes "Accommodation provided for Workers living in the Certification Unit must include adequate housing, sanitation facilities, clean water supply and access to health services, education and welfare facilities. The facilities and amenities provided must comply with the requirements of applicable national or international law."
201	Indicator 6.2.8	Request to use 6.2.8 in Draft 3 ...water supply (including clean water supply) RSPO needs to consult with ILO as this requirement refers to ILO documents.
202	Indicator 6.2.8	Request to use 6.2.8 in Draft 3 ...water supply (including clean water supply) RSPO needs to consult with ILO as this requirement refers to ILO documents.
203	Indicator 6.2.8	Request to use 6.2.8 in Draft 3 ...water supply (including clean water supply) RSPO needs to consult with ILO as this requirement refers to ILO documents.

No	Criteria/Indicator	Comment (English)
204	Indicator 6.2.8	<p>Request to use 6.2.8 in Draft 3</p> <p>...water supply (including clean water supply)</p> <p>RSPO needs to consult with ILO as this requirement refers to ILO documents.</p>
205	Indicator 6.2.8	<p>Request to use 6.2.8 in Draft 3</p> <p>...water supply (including clean water supply)</p> <p>RSPO needs to consult with ILO as this requirement refers to ILO documents.</p>
206	Indicator 6.2.8	<p>Suggest to reword "including water that is safe to drink" to clean water.</p> <p>The definition of "Safe Drinking Water" needs to be clarified at least according to applicable national regulations. According to regulations, safe drinking water is defined as clean water that is safe to drink after boiling. The government team also checks and maintains unit water quality.</p> <p>Additionally based on ILO No. 115 II housing standard refers to Point 8 C) adequate supply of safe water, ILO does not require safe drinking water.</p>
207	Indicator 6.2.8	<p>Request to use 6.2.8 in Draft 3</p> <p>...water supply (including clean water supply)</p> <p>RSPO needs to consult with ILO as this requirement refers to ILO documents.</p>
208	Indicator 6.2.8	<p>Request to use 6.2.8 in Draft 3</p> <p>...water supply (including clean water supply)</p> <p>RSPO needs to consult with ILO as this requirement refers to ILO documents.</p>
209	Indicator 6.2.8	<p>Request to use 6.2.8 in Draft 3</p> <p>...water supply (including clean water supply)</p> <p>RSPO needs to consult with ILO as this requirement refers to ILO documents.</p>
210	Indicator 6.2.8	<p>Request to use 6.2.8 in Draft 3</p> <p>...water supply (including clean water supply)</p> <p>RSPO needs to consult with ILO as this requirement refers to ILO documents.</p>

No	Criteria/Indicator	Comment (English)
211	Indicator 6.2.8	Request to use 6.2.8 in Draft 3 ...water supply (including clean water supply) RSPO needs to consult with ILO as this requirement refers to ILO documents.
212	Indicator 6.2.8	Request to use 6.2.8 in Draft 3 ...water supply (including clean water supply) RSPO needs to consult with ILO as this requirement refers to ILO documents.
213	Indicator 6.2.8	Indicator 6.2.8. Request to use Draft 3 - 6.2.8. ... water supplies (including supply of safe water) RSPO needs to consult with ILO since this requirement refers to ILO documents.
214	Indicator 6.2.8	Request to use 6.2.8 in Draft 3 ...water supply (including clean water supply) RSPO needs to consult with ILO as this requirement refers to ILO documents.
215	Indicator 6.2.8	Request to use 6.2.8 in Draft 3 ...water supply (including clean water supply) RSPO needs to consult with ILO as this requirement refers to ILO documents.
216	Indicator 6.2.8	6.2.8 Add reference to the fact that workers are not obliged to live in the workplace if they prefer to have their own accommodation, and that they are free to leave the premises and housing whenever they wish. The rent of the housing (if it is not free) should be lower or equivalent to market rate.
217	Indicator 6.2.8	Request to use Draft 3 - 6.2.8. ... water supplies (including supply of safe water) RSPO needs to consult with ILO since this requirement refers to ILO documents.
218	Indicator 6.2.8	Revert to draft 3 for water supply including clean water supply. If ILO standards are used then RSPO needs to consult with ILO for implementation in the field.
219	Indicator 6.2.8	Request to use 6.2.8 in Draft 3 ...water supply (including clean water supply) RSPO needs to consult with ILO as this requirement refers to ILO documents.

No	Criteria/Indicator	Comment (English)
220	Indicator 6.2.8	Request to use 6.2.8 in Draft 3 ...water supply (including clean water supply) RSPO needs to consult with ILO as this requirement refers to ILO documents.
221	Indicator 6.2.8	Request to use 6.2.8 in Draft 3 ...water supply (including clean water supply) RSPO needs to consult with ILO as this requirement refers to ILO documents.
222	Indicator 6.2.8	6.2.8 Add reference to the fact that workers are not obliged to live in the workplace if they prefer to have their own accommodation, and that they are free to leave the premises and housing whenever they wish. The rent of the housing (if it is not free) should be lower or equivalent to market rate.
223	Indicator 6.2.8	Request to use 6.2.8 in Draft 3 ...water supply (including clean water supply) RSPO needs to consult with ILO as this requirement refers to ILO documents.
224	Indicator 6.2.8	6.2.8 ... water supplies (including supply of safe water) RSPO needs to consult with ILO since this requirement refers to ILO documents.
225	Indicator 6.2.8	Request to change "water that safe to drink" to "clean water" due too difficult to implemented
226	Indicator 6.2.8	Request to use 6.2.8 in Draft 3 ...water supply (including clean water supply) RSPO needs to consult with ILO as this requirement refers to ILO documents.
227	Indicator 6.2.8	Indicator 6.2.8 : For the part about 'water supplies (including water that is safe to drink),' it is suggested to revise it to 'access to clean water, including safe drinking water.' 'Safe drinking water' refers to ILO Convention No. 155 (Occupational Safety and Health Convention, 1981) and ILO Recommendation No. 164 (Occupational Safety and Health Recommendation, 1981)
228	Indicator 6.2.8	Leave the indicator as it was before, in the 2018 version.
229	Indicator 6.2.9	We propose 'healthy' instead of 'Edible / safe' (potential misunderstanding due to translation issue)
230	Indicator 6.2.9	Talk about food in general? Even if they are not given housing?
231	Indicator 6.2.9	Proposed wording: The Unit of Certification shall ensure workers have access to safe and sufficient food.
232	Indicator 6.2.9	This indicator is impossible to audit. What would be the evidence for "safe", "sufficient" and "affordable"?

No	Criteria/Indicator	Comment (English)
233	Indicator 6.2.9	add the word nutritious after the word safe
234	Indicator 6.2.9	indicator does not require definite timeline to complete the transition,. UOC will just need to the plan and review annually.
235	Criteria 6.3	What does living wage mean and how does it connect to decent wage? Could you connect it to the poverty index as well? What is the daily income that must be earn and what about in kind benefits? Different region have different pay
236	Criteria 6.3	Living Wage: We agree with the indicator since it stipulates is the prevailing wage and not the living wage, the criterion is not the same since in the criterion it stipulates "decent" and "progressively" and in the indicator neither of the two terms.
237	Criteria 6.3	Can we put minimum wage for each of the worker categories in worker definition?
238	Criteria 6.3	Growers prefer Draft 3, 6.2 and not agreeing to split the criteria into 2 (6.2 and 6.3) in proposed changes
239	Criteria 6.3	2,018 Pncs. We were talking about living wage. It's a standard. The standard that we are trying to achieve is living wage. [...] I understand that you're doing it in a phased approach, and it's you know it. We have to move in that way, but you cannot water it down and put it as a separate criteria.
240	Criteria 6.3	with regards to this particular indicator as CNV, we're also looking into making a suggestion, and how you can also include the role of labour unions. You need to also be aware of their negotiation position that they should have, and the role they should have also in terms of the calculation that's being made in with regards to living wage.
241	Criteria 6.3	make reference to the role of labour unions in negotiating higher wages and involving them in wage calculations and setting living wage benchmarks
242	Criteria 6.3	The criterion is not related to the indicator, in fact the indicator is what we are currently doing in companies (determining the prevailing salary) it is suggested to align the criterion with what the indicator asks for.
243	Indicator 6.3.1	Post 2026 for action on living wage, so when will this be a requirement? Hopefully not another 3 years for step 2 and then start step 3 with 3 years to show compliance, which would be effectively, in another decade? For RSPO this is not sufficiently ambitious for it to continue to say it is sustainable palm oil, if actions on such social issues lag so far behind. Feedback type: Limitation/Justification
244	Indicator 6.3.1	Return to previous requirement « A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. ». It is not acceptable to lower expectations in this new standard version.

No	Criteria/Indicator	Comment (English)
245	Indicator 6.3.1	<p>6.3.1 INDICATOR: Return to previous requirement “A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.” Not acceptable to lower expectations in this new standard version</p> <p>COMPLIANCE REQUIREMENT: Precise scope of application to “all workers”</p> <p>INFORMATIVE GUIDELINE” Remove “Steps 2 and 3 are beyond the scope of the P&C 2024,” and add in the scope of P&C 2024, and precise timeline of guideline for these two steps. Also precise timeline for PROCEDURAL NOTE</p> <p>COMPLIANCE CHECKLIST: There is no reference for compliance verification. Ensure all workers are paid at least a living wage.</p>
246	Indicator 6.3.1	<p>6.3.1 INDICATOR: Return to previous requirement “A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.” Not acceptable to lower expectations in this new standard version</p> <p>COMPLIANCE REQUIREMENT: Precise scope of application to “all workers”</p> <p>INFORMATIVE GUIDELINE” Remove “Steps 2 and 3 are beyond the scope of the P&C 2024,” and add in the scope of P&C 2024, and precise timeline of guideline for these two steps. Also precise timeline for PROCEDURAL NOTE</p> <p>COMPLIANCE CHECKLIST: There is no reference for compliance verification. Ensure all workers are paid at least a living wage.</p>
247	Indicator 6.3.1	<p>Living Wage is referred to in Criterion but not in indicator - also there is only one indicator here, which appears to be a first step towards Living Wage. Where are the other steps?</p> <p>Feedback type:Limitation/Justification</p> <p>Note: Weakening of the RSPO standard</p>
248	Criteria 6.4	The wording of the criteria should be reduced.
249	Criteria 6.4	There is a problem of underrepresentation of unions on plantations. Growers often actively prevent unions from becoming active and exercising FoA. In order to make the policy implementable labour unions should actively be facilitated to have a social dialogue on plantations and in mills, otherwise union representation will remain low.
250	Criteria 6.4	Criteria 6.4 and Indicator 6.4.2: Leave it as the 2018 version.
251	Indicator 6.4.1	Further clarify these two indicators that by interpretation can cause problems
252	Indicator 6.4.2	should be upgraded to a critical indicator C
253	Indicator 6.4.3	These minutes tend to be confidential, cant be accessible.
254	Criteria 6.5	Criteria 6.5 and Indicator 6.5.2: Leave as 2018 version including national compliance

No	Criteria/Indicator	Comment (English)
255	Indicator 6.5.1	Add a paragraph in Indicator 6.5.1 (C): "Before establishing and implementing a child protection policy, the certification unit must carry out a child rights impact assessment by referring to the RSPO child rights technical baseline. This assessment can be carried out together with the Social Impact Assessment or HRDD."
256	Indicator 6.5.1	Is there a need to specify the "worst form of child labour" if we say that child labour in general is prohibited? I have looked at the definitions of the worst form of child labour, it covers very serious breaches such as trafficking, sexual exploitation, trafficking. Are we saying that there is a risk of these in a palm oil company? I doubt it.
257	Indicator 6.5.2	Please return to: 6.4.2(C) The Unit of Certification shall not employ workers below the age of 18. An age screening verification procedure shall be documented. 6.4.3(C) Apprenticeships for young people over the age of 15 and below 18 organised for the purpose of education and training are permitted under supervision. Apprenticeships of young workers shall not interfere with schooling nor be harmful to their health or development. Also, it should be ensured that no permanent work is covered as apprenticeship.
258	Indicator 6.5.2	We agree with the minimum age or whatever age the company policy says.
259	Indicator 6.5.2	- RSPO take note that Young Workers are not being monitored by the UoC
260	Indicator 6.5.2	Employment of young persons comes with a lot of responsibilities. More clarity is needed on the type of jobs and working conditions required for the employment of young persons.
261	Indicator 6.5.2	6.5.2 Add a reference to international standards for minimum working age requirements, in addition to the current callout of no younger than 15. Should not be based on just local legislation (note: 2019 RSPO ISH standard is already referencing international standards and age 15 (in 3.2E and 3.2 MS A)
262	Indicator 6.5.2	6.5.2 Add a reference to international standards for minimum working age requirements, in addition to the current callout of no younger than 15. Should not be based on just local legislation (note: 2019 RSPO ISH standard is already referencing international standards and age 15 (in 3.2E and 3.2 MS A)
263	Indicator 6.5.3	Should remove "screening". The indicator mixes two concepts, the preemployment age verification and remediation. These two should not be mixed. There should be a separate requirement for remediation. The text on remediation is very vague. What is the RSPO supplementary document? Why is the term guided used? It suggests that the RSPO document is not normative.
264	Indicator 6.5.3	6.5.3 Remediation and verification of child protection should be defined more clearly. There must be evidence for means put in place to effectively enable the child to go back into an educational structure.
265	Indicator 6.5.3	6.5.3 Remediation and verification of child protection should be defined more clearly. There must be evidence for means put in place to effectively enable the child to go back into an educational structure.
266	Criteria 6.6	The text of the criteria does not make sense, if everything is prevented why make reference to mitigation or being addressed. The criteria should read: "All forms of intimidation, harassment, abuse or violence in the workplace shall be prohibited".

No	Criteria/Indicator	Comment (English)
267	Indicator 6.6.1	Add definition of abuse.
268	Indicator 6.6.1	Add an additional sentence in the compliance requirements column: "The policy must outline clear guidelines and procedures for investigation, punishment/sanctions, and remediation of incidents including the provision of complaint posts and safe houses for victims of violence and sexual harassment."
269	Indicator 6.6.1	We don't use the term "punishment" in RSPO context. We should refer these matters to the UoC disciplinary procedures. I am also unsure what constitutes remediation in this context. For child labour there will be guidance, what about in this case? Finally replace "socialise" with communicated.
270	Criteria 6.7	What is it mean by the "rights promoted"??
271	Indicator 6.7.1	Replace "socialize" with "communicated"
272	Indicator 6.7.1	Need more clarification in the "education for women and awareness of the workforce". The education can be interpret: Is the company obliged to provide formal education for female workers? or is the company obliged to provide education on reproductive protection and the rights of female workers? Suggest to clarify the "education" is to provide on rights of women workers.
273	Indicator 6.7.1	6.7.1 Recommend adding equal treatment and contractual terms for women, not just pay.
274	Indicator 6.7.1	6.7.1 Recommend adding equal treatment and contractual terms for women, not just pay.
275	Indicator 6.7.2	Suggest to redrafting the statement by adding this statement in the indicator 'There shall be no interference of management in the Womens' Welfare and Empowerment Committee of women workers.'
276	Indicator 6.7.2	As there shall be no management's interference in Womens' Welfare and Empowerment Committee of women workers, suggest to rephrase 'facilitate' into 'support'. This is to avoid management's influence on the formation of the committee as it shall be established among the women workers themselves.
277	Indicator 6.7.2	THE TERM GRIEVANCE IS CURRENTLY NOT DEFINED IN THE DEFINITIONS SECTION. Participatory approach and social research techniques should also be mentioned in this section.

No	Criteria/Indicator	Comment (English)
278	Indicator 6.7.2	<p>Input to Indicator 6.7.2 (C):</p> <p>The UOC shall facilitate the establishment of a Gender Committee consisting of female workers to discuss matters such as but not limited to matters related to discrimination, safety, grievances, or workplace issues. The Gender Committee shall be allowed to determine the frequency of meetings. Meetings shall be conducted in a language understood or spoken by its members. The UOC shall provide a safe and comfortable meeting place.</p> <p>The UOC shall respond to any concerns raised by the Gender Committee.</p> <p>In the informative guidance column The duties of the Gender Committee include:</p> <p>(i) Identifying risks and addressing issues of concern and opportunities for improvement for female workers (iii) Raising awareness and capacity among workers and management on women's safety and health (e.g., access to health services during pregnancy, childbirth, and postpartum)</p> <p>In the Compliance Requirements column:</p> <p>The UOC shall facilitate the establishment of a Gender Committee consisting of female and male workers, and management representatives to support the implementation of the Gender Committee program.</p> <p>The Committee is empowered to discuss matters related to discrimination, safety, grievances, workplace issues and other relevant topics.</p> <p>The Committee is allowed to determine the frequency of meetings based on the needs and availability of its members.</p> <p>Meetings are held in a language understood or spoken by its members. Any action taken must be documented. If no action is taken, the UoC must record the reasons.</p> <p>Provide a safe and comfortable meeting place for the Gender Committee to hold its meetings.</p> <p>The Gender Committee team has the knowledge and skills to handle problems related to women's issues. If it does not have a team with credible capacity, the UoC can work with organizations that have the capacity to resolve such conflicts.</p>
279	Indicator 6.7.2	There is already a Gender Committee. Is it necessary to have a Women's Welfare Committee?
280	Indicator 6.7.2	<p>In c), the new wording of what was previous gender committees might lead to confusion, as prior to RSPO promoting gender committees, often women welfare committees existed on plantations already. Yet, these committees did not address women empowerment on their (labour) rights. Rather these committees then only focussed on social and welfare activities like vaccination etc. Changing the wording of gender committees in the implementation will therefore lead to confusion, while actually improvements have been reached past few years in terms of number of new gender committees that had been set up. We therefore urge for the wording to remain gender committee.</p>

No	Criteria/Indicator	Comment (English)
281	Indicator 6.7.2	In c), A connection should be made between the work of gender committees and unions active on the plantation. There is a low representation of women in labour unions. Yet labour unions are there to improve working conditions. It is important to make women aware of the role of labour unions and how they can become active. So it should be part of their training as well.
282	Indicator 6.7.2	Why the wording of the gender committee was rephrased? The women committee sometimes are more focused in on social activities and not much on labour rights. To make sure the committee is effective, men to be included in these committees, generally worker and also Union, if they are active in the plantation.
283	Indicator 6.7.2	The new wording does not really address the gender concerns
284	Indicator 6.7.3	should be upgraded to a critical indicator C and develop and determine rules to the benefit of childcare policies and procedures
285	Indicator 6.7.3	Suggest to revise to "pregnancy tests shall only be required when legally mandated, but cannot be used as a condition of employment ".
286	Indicator 6.7.3	Am I correct to conclude that the UoC is responsible for the medical cost of all pregnant and new mothers?
287	Indicator 6.7.3	6.7.3 Add "When such testing is legally mandatory, your company will not use the test or the result as a condition of employment." This is to ensure that in places where pregnancy tested are mandated by law, they are not taken into account for employment related decisions.
288	Indicator 6.7.3	6.7.3 Add "When such testing is legally mandatory, your company will not use the test or the result as a condition of employment." This is to ensure that in places where pregnancy tested are mandated by law, they are not taken into account for employment related decisions.
289	Criteria 6.8	6.8 Ensure that the standards are aligned with the employer pays principles. Ensure it is clear that employers should pay for agency fees. It is key that there is addition of a reference to agency fees and employers paying for those; and remediation i.e., reimbursement of recruitment fees.
290	Criteria 6.8	Put the force labor indicator into separate indicator in P&C is not practical, whereas, the indicator still lead to signed of ILO non-conformance. furthermore, all the indicator is major, 5 major non-compliance, in result to immediate suspension
291	Criteria 6.8	6.8 Ensure that the standards are aligned with the employer pays principles. Ensure it is clear that employers should pay for agency fees. It is key that there is addition of a reference to agency fees and employers paying for those; and remediation i.e., reimbursement of recruitment fees.
292	Criteria 6.8	Criteria 6.8 and Indicator 6.8.8: According to the 2018 version or the new version according to the company's internal policies with the prior knowledge of the worker
293	Indicator 6.8.1	Repetitive requirement in P6
294	Indicator 6.8.1	The frequency is subjective
295	Indicator 6.8.1	- "These policies and procedures shall be made Publicly Available and socialised to the Workforce, Suppliers and Contractors labor recruiters-in a language that they understand." - "Where migrant workers are employed" not clear. Make it clear it is the UoC.

No	Criteria/Indicator	Comment (English)
296	Indicator 6.8.1	<p>Policy and procedures on the prevention and remediation of Forced Labour and trafficking in persons to be socialised to Labour Recruiters, instead of Contractors.</p> <p>Suggest to replace "contractors" with "labour recruiters"</p>
297	Indicator 6.8.1	<p>Policy and procedures on the prevention and remediation of Forced Labour and trafficking in persons to be socialised to Labour Recruiters, instead of Contractors.</p> <p>Suggest to replace "contractors" with "labour recruiters"</p>
298	Indicator 6.8.1	<p>Compliance checklist: Existence of policies and procedures on:</p> <p>A. Identification of potential forced labor and trafficking risks.</p> <p>B. Dissemination of results of Identification of potential forced labor and trafficking risks</p> <p>C. Documented forced labor and trafficking training, prevention, and remediation plans;</p> <p>D. Remediation of recruitment and related costs; and</p> <p>E. Specific employment procedures for migrant workers (if applicable)</p> <p>Note: The above policies and procedures must be incorporated into the prerequisites or contracts with suppliers and contractors.""</p> <p>Evidence of dissemination of the policy to prospective and existing workers, suppliers, and contractors. Evidence that the policy is publicly available.</p> <p>Process/Procedure to monitor implementation and compliance with the Policy</p> <p>Documented evaluation by the UoC of their third-party recruitment agencies is available, if applicable"</p>
299	Indicator 6.8.2	<p>It is not clear what it means by 'achievable work targets'. More guidance and clarity is needed to avoid inconsistencies and abuse.</p>
300	Indicator 6.8.2	<p>Suggest to improve clarity / definition for point '(vi) Recruitment fees and related costs' in a guidance section. RSPO should establish guidelines and set clear boundaries for defining related recruitment fees. It is important to specify the extent to which these related fees should be covered.</p>
301	Indicator 6.8.2	<p>c. iii) Deception in the calculation and payment of wages, including unlawful wage deductions - Suggestion to include something on overtime here</p>
302	Indicator 6.8.2	<p>Work targets, as stated in 6.2, are to be calculated by the UoC. These are based on research done by the company. In 6.8.2 - the term unachievable work targets is used. While work targets are based on research, it is still subjective, and it may therefore be open for interpretation to an auditor or workers what achievable and unachievable work targets are. We therefore would like a clear definition of the term unachievable targets, to avoid confusion.</p>

No	Criteria/Indicator	Comment (English)
303	Indicator 6.8.2	<p>Removed referenced to: Retention of identity documents or passports Involuntary overtime Lack of freedom of workers to resign Penalty for termination of employment (may be covered in 6.8.9C)</p> <p>Why have these been removed?</p> <p>Feedback type:Limitation/Justification</p> <p>Note: Weakening of the RSPO standard</p>
304	Indicator 6.8.3	Implementation for remediation of forced labor practices should be implemented when the latest RSPO P&C comes into force (not retroactively).
305	Indicator 6.8.3	-Revert to Draft 3
306	Indicator 6.8.3	We don't have a similar requirement for child labour, harrassment. Why only remediation for forced and trafficked labour? There should be a general requirement for record keeping.
307	Indicator 6.8.3	In c), maintain these records for at least 8 to 10 years, as unfortunately i often takes more than 5 years for cases to be resolved when they are being addressed through grievance mechanisms.
308	Indicator 6.8.3	Suggest to change the duration of data storage from 5 years to 2 years. This aligns with document storage requirements for the supply chain requirement as well as national regulations.
309	Indicator 6.8.3	Until the employment relationship ends.
310	Indicator 6.8.4	Clarity on recruitment fee. There is a special case in Gabon, if the company were to recruit people who do not have passport, the recruiter will pay in advance for the passport and the people will have to repay the company by pay deduction. Is this recruitment fee?
311	Indicator 6.8.4	How will it be shown that recruitment fees have been made, if this is an illegal practice. The proposal is to stipulate it as a prohibition such practice, in case it is evidenced, the reimbursement of such fees must be demonstrated.
312	Indicator 6.8.4	<ul style="list-style-type: none"> - when will the guidance develop? - lack of clarity of "active workers" -Growers worry about methodologies. The auditor might ask why UoC doesn't pay exact the number of the past workers.
313	Indicator 6.8.4	detailed definitions and components that include costs and expenses related to recruitment
314	Indicator 6.8.4	Implementation for record keeping related to recruitment costs should be implemented when the latest RSPO P&C comes into force (not retroactive).
315	Indicator 6.8.4	RSPO should establish guidelines and set clear boundaries for defining related recruitment fees. It is important to specify the extent to which these related fees should be covered.

No	Criteria/Indicator	Comment (English)
316	Indicator 6.8.4	- when will the guidance develop? - lack of clarity of "active workers" - Growers worry about methodologies. The auditor might ask why UoC doesn't pay exact the number of the past workers.
317	Indicator 6.8.4	To confirm that members who completed the repayment process before the endorsement of the guidance developed by RSPO, do not need to revisit the matter again after the guidance has been endorsed.
318	Indicator 6.8.4	To confirm that members who completed the repayment process before the endorsement of the guidance developed by RSPO, do not need to revisit the matter again after the guidance has been endorsed.
319	Indicator 6.8.4	<p>We strongly believe that the document to be developed by the RSPO HRWG should be called a Procedure instead of Guidelines, as guidelines are not enforceable.</p> <p>Whether stated in the P&C or other documents (procedure/guideline), we need to make clear that:</p> <ol style="list-style-type: none"> 1. An assessment to take place on local hires to understand if there is a risk of debt bondage, where if identified, these workers should be included in the repayment scope. 2. We should also make clear that companies should make concerted effort to identify and repay workers that have left or that have been terminated. 3. Lack of receipts shouldn't be interpreted as a lack of evidence - companies should ensure that worker interviews are adopted. <p>Regarding the revised definition of recruitment fees and related costs: The proposed definition is rather generic and there is not enough clarity on what should be in scope. This definition could be interpreted differently and some costs/fees might be left out during repayment. There needs to be clarity that all fees should be in scope.</p> <p>Propose to align with the ILO definition: Recruitment fees include any and all fees, charges, costs, assessments or other financial obligations associated with the recruiting process regardless of the manner or timing of their imposition or collection, including fees, charges, costs, assessments or other financial obligations assessed against workers in sending, receiving, or transit countries.</p> <p>Regarding "available methodologies" for repayment as mentioned in the Procedural Note: Are we clear on what 'available methodologies' means? Is there alignment among these methodologies on the definition & scope of recruitment fees? We support creating standardization as much as possible. It is our goal to ensure that full repayment is made, not partial repayment.</p>
320	Indicator 6.8.4	The indicator is impossible to audit without knowing the methodologies that it refers too.
321	Indicator 6.8.4	Hiring fees are an illegal practice, the indicator should focus on prohibiting the payment of hiring fees and if they are made, they should be remedied.
322	Indicator 6.8.5	What happens if the workers asks the employee to keep their passport as they don't feel safe keeping it with them? Suggest to include this example somewhere in the standard

No	Criteria/Indicator	Comment (English)
323	Indicator 6.8.5	Suggestion to refine the phrasing on the second indicator for clarity: - Secure storage for these documents shall be provided for workers accommodated by the Unit of Certification, ensuring that it is freely accessible to the Workers.
324	Indicator 6.8.5	Suggested revision: Secure storage for these documents shall be provided at no cost , for those workers who are accommodated by the Unit of Certification in accommodation provided for Workers living within the Unit of Certification at all times and shall be freely accessible to the Workers.
325	Indicator 6.8.6	Further clarify these two indicators that by interpretation can cause problems
326	Indicator 6.8.6	- Revert to Draft 3
327	Indicator 6.8.6	"reasonable" is highly subjective and open to interpretations.
328	Indicator 6.8.6	6.8.6. Ensure safety and security while within the company is in accordance with company policies.
329	Indicator 6.8.6	Ensure health and safety while on company premises is in accordance with each company's policies.
330	Indicator 6.8.7	Must have transportation means road access for transportation or vehicles? Is there a limit to this communication access? Is this regular phone sufficient? Does the signal quality have to be good?
331	Indicator 6.8.7	Violation by workers of restrictions on access to transportation and communication in the certification unit on the basis of security considerations should be subject to disciplinary action. This is relevant to the content of indicator 6.8.6
332	Indicator 6.8.7	Suggest redrafting the statement putting in the indicator related to 'access to transport' into 'access to transport within the UoC' for better clarity. Access to transport outside of the UoC is beyond the scope of management's responsibilities.
333	Indicator 6.8.7	Suggest to remove 'and/or' to avoid confusion and avoid wrong interpretation of the intent for this indicator.
334	Indicator 6.8.7	RSPO should clarify the meaning of "access to communication" mentioned in the indicator and specify whether it refers to mobile network coverage within the Unit of Certification, as this aspect may be beyond the control of management.
335	Indicator 6.8.7	Further clarify these two indicators that by interpretation can cause problems
336	Indicator 6.8.7	"Workers who live on-site shall have access to transport and/or communication. Restriction of transport and/or communication shall not be used as a disciplinary measure." Suggest to add "regular and frequent communication". To also provide more clarity on what communication and restriction of communication means here.
337	Indicator 6.8.7	This indicator cannot be audited as it is. What does "shall have access" mean??
338	Indicator 6.8.7	6.8.7. Subject to transport availability, during working hours. Freedom of movement and communication and will not be restricted as a disciplinary measure. A definition of "communication" should be given.
339	Indicator 6.8.8	To improve the auditability of the indicator should specify the extent of "prior consent" required by the Unit of Certification (UoC) to comply with this requirement. What is the extent of the prior consent needed by the UoC to comply with this requirement and whether prior consent verbally obtained from the workers is sufficient.

No	Criteria/Indicator	Comment (English)
340	Indicator 6.8.8	<p>Suggestion: Move 6.8.8 (C) back to “voluntary” and add “prior consent.”</p> <p>Topics involuntary overtime:</p> <ul style="list-style-type: none"> • Concern: "Prior consent" does not guarantee the absence of involuntary overtime. • Suggestion: Make the standard less restrictive by removing “records of workers' consent for overtime work” from the Compliance checklist. <p>Informative guidance: Suggestion: Simplify the language used in the informative guidance to make it easier to understand.</p>
341	Indicator 6.8.8	<p>Suggest to replace "prior consent" with “voluntary”</p> <p>Concern: "Prior consent" does not guarantee the absence of involuntary overtime.</p> <p>Make the standard less restrictive by removing “records of workers' consent for overtime work” from the Compliance checklist.</p>
342	Indicator 6.8.8	<p>Suggest to replace "prior consent" with “voluntary”</p> <p>Concern: "Prior consent" does not guarantee the absence of involuntary overtime.</p> <p>Make the standard less restrictive by removing “records of workers' consent for overtime work” from the Compliance checklist.</p>
343	Indicator 6.8.8	<p>Some specific jobs comes with automatic overtime hours such as factory work and security. Seeking prior consent from such workers not be feasible.</p>
344	Indicator 6.8.8	<p>Is the consent written or verabl consent is enough? Not clear.</p>
345	Indicator 6.8.8	<p>Suggestion: Move 6.8.8 (C) back to “voluntary” and add “prior consent.”</p> <p>Topics involuntary overtime:</p> <ul style="list-style-type: none"> • Concern: "Prior consent" does not guarantee the absence of involuntary overtime. • Suggestion: Make the standard less restrictive by removing “records of workers' consent for overtime work” from the Compliance checklist. <p>Informative guidance: Suggestion: Simplify the language used in the informative guidance to make it easier to understand.</p>
346	Indicator 6.8.8	<p>Should this also include that workers should be paid for overtime?</p> <p>Feedback type: Technical</p>

No	Criteria/Indicator	Comment (English)
347	Indicator 6.8.9	The draft states that there should be no penalty for termination of employment. This provision cannot be applied because Indonesia is a COUNTRY OF LAW. One of the laws in force in Indonesia, namely Law No. 13 of 2003, Article 62, states "If one party terminates the employment relationship before the end of the period stipulated in the fixed-term employment agreement, or the termination of the employment relationship is not due to the provisions referred to in Article 61 paragraph (1), the party terminating the employment relationship is required to pay compensation to the other party in the amount of the worker's/laborer's wages until the end of the term of the employment agreement." This also has the potential to be a problem when employees who commit violations/sanctions are subject to layoffs and fines due to their negligence or violations (according to Article 88A Paragraph 7 of the Job Creation Law)
348	Indicator 6.8.9	To clarify what is meant by "penalty of employment only." For example, if a contract states that workers must repay airfare if they leave early, would this be considered a penalty?
349	Indicator 6.8.9	To clarify what is meant by "penalty of employment only." For example, if a contract states that workers must repay airfare if they leave early, would this be considered a penalty?
350	Criteria 6.9	Propose for Criterion 6.9: The Unit of Certification shall strive for a safe working environment through the implementation of health and safety practices to protect workers and their families residing in the certification unit from work-related accidents and diseases such as mental health, reproductive health, chemical exposures, and ergonomics.
351	Indicator 6.9.1	6.8.1 (C) This point e) should be removed since it's already covered by point a) Assure a safe and healthy working place; "...e) Provide access to water that is safe to drink in the workplace."
352	Indicator 6.9.1	Propose for indicator 6.9.1 (C) : The Unit of Certification shall establish and implement Occupational Safety and Health policies. These policies shall be publicly available and disseminated to workers and their families living in the certification unit in a language that is easy to understand.
353	Indicator 6.9.1	Replace "socialize" with "communicated"
354	Indicator 6.9.1	The requirement "(e) Provide access to water that is safe to drink at workplace" needs to be better defined to avoid different interpretation. Workplace in the scope of plantation covers very wide area. If water already been provided at housing, and if the workers don't bring them to field, it should not be the responsibility of the management to bring the water up to the field for them.
355	Indicator 6.9.11	"Expenses arising from work-related incidents that have led to ailments, injuries or illnesses are covered in accordance with national legislation or by the Certification Unit if national legislation does not provide protection." The word Ailments can generate confusion at the time of the auditor's interpretation.
356	Indicator 6.9.11	What is the definition of medical care? Does this include for example cancer treatment, or end of life care? The way that the indicator is written suggests that the UoC is responsible for ALL medical care of the employees.
357	Indicator 6.9.11	6.9.11 Everything related to "occupational" ailments instead of "occupational diseases".
358	Indicator 6.9.12	Requirements for chemical handling should be grouped, these are now spread in 6.9.

No	Criteria/Indicator	Comment (English)
359	Indicator 6.9.12	Keep in mind that the use of chemicals is very broad, there are some chemical products that are not toxic or pesticides that are not toxic either.
360	Indicator 6.9.12	The UoC shall ensure that only trained workers handle, use or apply chemicals in accordance with the manufacturers' or suppliers' instructions and precautions. Personnel applying chemicals must demonstrate up-to-date understanding and knowledge related to their assigned tasks.- why only those applying to demonstrate understanding , how about those handling and use handle - store keepers, transporters ?
361	Indicator 6.9.2	Proposed for indicator 6.9.2 (C) : The Unit of Certification in making policies in P2K3 must consult with workers and/or trade unions. The UoC ensures that the Health and Safety (H&S) Committee in each of its factories and plantations conducts regular monitoring involving worker representatives. H&S Committee meetings must be conducted in a language understood by its members. The UoC must respond to any issues raised by the H&S committee. The UoC must have an OSH expert in accordance with the national policies of each country or refer to the KILO OSH standard."
362	Indicator 6.9.2	Replace "on" with "for" or some other suitable term. "on its mills" is gramatically not correct.
363	Indicator 6.9.2	In c), When there are unions present, a link should be establisihed between the H&S committees and the unions.
364	Indicator 6.9.5	The term chemical should be specific to hazardous chemicals
365	Indicator 6.9.5	The revision of the word pesticide to chemical can cause ambiguity. If replaced with chemical, of course, for parts such as the Laboratory / Warehouse also need a wash and rinse room (where according to K3 requirements, showers and eye showers are already available). In addition, related to the provision of a place to wash PPE, it should be combined with / done in the wash and rinse room facility considering that its function is the same.
366	Indicator 6.9.5	Replace the phrase "good conditioned PPE" with just "appropriate PPE," since the word "appropriate" already implies that the PPE provided to workers shall be in good condition.
367	Indicator 6.9.5	Make it clear that the facilities for washing PPE, washing and sanitary apply to the work of applying chemicals. Make it clear in each country what is meant by chemicals example Growth regulators.
368	Indicator 6.9.5	Suggest to remove 'good conditioned' and avoid redundancy in indicator as 'appropriate' word beforehand had explained the PPE condition that shall be provided to worker.
369	Indicator 6.9.5	Suggest to remove 'good conditioned' and avoid redundancy in indicator as 'appropriate' word beforehand had explained the PPE condition that shall be provided to worker.
370	Indicator 6.9.5	Suggest to add: replacement of PPE should be covered free of charge to the workers in the event they are worn or damaged.
371	Indicator 6.9.5	The indicator mixes many topics, it should be split into relevant indicators.
372	Indicator 6.9.5	The use of chemicals is very broad, therefore sanitary facilities should be limited to workers who apply pesticides, keeping in mind that there are many chemicals that are not toxic or non-toxic pesticides, for example ANA.
373	Indicator 6.9.5	6.9.5 There should be no salary deduction, retention or any form of deposit for PPE

No	Criteria/Indicator	Comment (English)
374	Indicator 6.9.5	6.9.5 There should be no salary deduction, retention or any form of deposit for PPE
375	Indicator 6.9.5	6.9.5 Threat Identification, Risk Assessment and Risk Control (TIRC) evaluation.
376	Indicator 6.9.6	What would be the evidence in health and safety for gender specific needs? What is the intent here with gender specific training requirement?
377	Indicator 6.9.7	Propose for indicator 6.9.7: The Unit of Certification shall assign trained personnel both at the workplace and around the certification unit in first aid, for all operations. Workers shall have access to complete first aid services including guidance.
378	Indicator 6.9.8	To remove the words 'annually' instead replace them with 'The ERP shall be reviewed, where needed / necessary.'
379	Indicator 6.9.9	To confirmed that the point of reference should be CHRA for Malaysia. Suggest for "hazardous chemicals" to replace "chemicals", this requirement should only be applicable to hazardous chemicals.
380	Indicator 6.9.9	To confirmed that the point of reference should be CHRA for Malaysia. Suggest for "hazardous chemicals" to replace "chemicals", this requirement should only be applicable to hazardous chemicals.

No	Criteria/Indicator	Comment (English)
1	Criteria 7.1	remove "to avoid and reduce the use of restricted and hazardous chemicals"
2	Criteria 7.1	The usage of 'and/or' here suggests that no option is given to the UoC. Sentence structure to be improved for clarity. Feedback Type: Text/Wordsmithing
3	Criteria 7.1	There is a need to streamline/clarify the stricter requirements to be followed; RSPO standards or National Regulations (via NIs). Feedback Type: Technical
4	Criteria 7.1	Criterion has a note about NI determining specific best practices etc., then lists a series of issues which are covered in this indicator and elsewhere. Unclear whether NI or the P+C takes precedence - needs clarifying throughout as this format is the same for several criteria Feedback type: Implementability/Auditability
5	Indicator 7.1.1	It is hard to see why a regenerative forest would qualify as a natural forest. This is because sometimes it is difficult to differentiate between a regenerative forest and shrubland.
6	Indicator 7.1.1	What is the basis of adopting AFI's definition of forest as RSPO's standard is already a very high standard.
7	Indicator 7.1.1	Remove last part of the indicator; after 'plan to avoid...'
8	Indicator 7.1.1	The indicator should simply state: " The UoC shall develop and implement and IPM" > no need for the rest of the text.
9	Indicator 7.1.2	The (B) requirement is too specific.
10	Indicator 7.1.2	List of prohibited to be kept generic rather as per WHO etc
11	Indicator 7.1.2	The categories of pesticide, carcinogen, we are okay with it. We agree from normal to critical.
12	Indicator 7.1.2	Paraquat is not pesticides category and already included under WHO 1A or 1B
13	Indicator 7.1.2	Restricted & hazardous pesticides/herbicides should be allowed under certain serious circumstances
14	Indicator 7.1.2	Suggest to clearly mention human health and to list the conventions and international regulation to cite the version referenced i.e. date
15	Indicator 7.1.2	The use of pesticides classified as hazardous should still be permissible, following the guidelines in P & C 2018. This means their use should be allowed under certain conditions that require a due diligence process or authorization/permission from local authorities (for example: to control an ongoing pest outbreak).
16	Indicator 7.1.2	In the wording of the current criterion, the exception for the application of certain chemicals is not contemplated, which was explicit in the 2018 P&C. This can generate complications at the time of the audit, as it is a case that is not contemplated in the standard. It is proposed to return to the previous wording:
17	Indicator 7.1.2	Although in the wording of the criterion, it refers to the national interpretation, it is considered that the exemptions for the use of certain chemicals are not necessarily local conditions, but a condition of the crop that can happen regardless of its geographical location, considering, for example, that pests do not respond to border limits.

No	Criteria/Indicator	Comment (English)
18	Indicator 7.1.2	Agree that the variable of human health should be included.
19	Indicator 7.1.2	It is proposed to continue with the previous text: Considering that there may be exceptional circumstances, these must be validated by a due diligence process, or when authorized by government authorities for pest outbreaks. Due diligence refers to:a) Judgment of the threat and verification of why it is a significant threat.b) Why there is no other alternative that can be used.c) What process was applied to verify why there is no other less dangerous alternative.d) What is the process to limit the negative impacts of implementation.e) Estimation of the implementation schedule and measures taken to limit application to the specific outbreak.
20	Indicator 7.1.2	Confused by the classification of changes in former 7.12 mostly type as "C" type changes (amending language). Suggest that it would be good to hear about the rationale for dropping/merging some indicators. to understand the rationale on the changes for C type changes due to reasoning of the transparency. And for cross-referencing other criteria/indicators under compliance requirements Clarity on rationale for changes is even more important considering the technical working groups and two public consultations in 2023 didnt include any revisions to 7.1.2
21	Indicator 7.1.2	Restricted & hazardous pesticide/herbicide should only be allowed to be used under certain serious circumstances and its has to be specifically applied in consideration of the risk involved.
22	Indicator 7.1.2	(c) Is not clear to what they refer too. Which convention? Mentioned including everything in the Convention List or only 1A or 1B. Redaction. More limited?
23	Indicator 7.1.2	Restricted & hazardous pesticide/herbicide should only be allowed to be used under certain serious circumstances and its has to be specifically applied in consideration of the risk involved.
24	Indicator 7.1.2	Suggest to add back the current clause whereby, "unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks"
25	Indicator 7.1.2	Not clear why category B has been added and what will be the impact of adding this category.
26	Indicator 7.1.2	Suggest to remove the "identical" word. In the next audit, the UoC may conduct audits in different months due to the operational schedule; thus, the data may not be "identical 12 months" for each audit.
27	Indicator 7.1.2	Restricted & hazardous pesticide/herbicide should only be allowed to be used under certain serious circumstances and it has to be specifically applied in consideration of the risk involved.

No	Criteria/Indicator	Comment (English)
28	Indicator 7.1.2	<p>It seems a lot has been removed compared to 2018 P&C here, and not clearly incorporated elsewhere. This includes:</p> <ul style="list-style-type: none"> - Criterion 7.2 from 2018 P&C: "Pesticides are used in ways that do not endanger the health of workers, families, communities, or the environment" - Requirement for justification of pesticides used - Requirements related to due diligence on pesticide use - Requirements regarding storage of pesticides - Requirements regarding disposal of pesticides - Restrictions on handling of pesticides (e.g. by children, pregnant or breast-feeding women, those with relevant medical conditions) <p>We're concerned that these things no longer seem to appear as requirements in the P&C and that this is a potential weakening of the standard</p> <p>Feedback type: Limitation/Justification</p> <p>Note: Weakening of the P&C</p>
29	Indicator 7.1.3	What is the point of these records? What impact are we looking into? - suggest to remove
30	Indicator 7.1.5	Suggest to separate the indicators back to unmanned drones (less risk of NC)
31	Indicator 7.1.5	Please make more precise: "7.1.5(C) The Unit of Certification shall not launch aerial sprayings of pesticides, unless in exceptional circumstances where no other viable alternatives are available. When aerial spraying is unavoidable, prior approval from government authorities obtained and detailed information of the aerial spraying shall be provided to affected local communities at least 48 hours prior to application of aerial spraying and documented."
32	Indicator 7.1.5	To improve clarity of indicator. (note : NO improvement was proposed)
33	Indicator 7.1.5	7.1.5 how does drone and aerial spraying is different in the context of the requirement. additional guideline should be provided to differentiate both of this term
34	Indicator 7.1.5	<p>The requirements from 2018 to inform local government and communities in advance ("This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.") has been removed here - why? This seems to be a weakening of the standard</p> <p>Feedback type: Limitation/Justification</p> <p>Note: Weakening of the P&C</p>
35	Indicator 7.1.6	To add the reference from the National Regulation in the Informative Guidance (SW)
36	Indicator 7.1.6	What is the basis of using the cut off date Nov 2024? Is it based on the research or just based on a administrative matter? I suggest to use a strong research basis rather just administrative (SW)
37	Indicator 7.1.6	Suggest to add back (from draft 3) to allow the reference of "scientific protocols"

No	Criteria/Indicator	Comment (English)
38	Indicator 7.1.6	To revert Draft 3 to avoid misunderstandings: Change the sentence about the list of invasive species to a reference. Switch to 'Or' only, eliminating 'And'.
39	Indicator 7.1.6	Indicator 7.1.6 and 7.1.7: Propose to revert to the wording in P & C 2018, which states: "Invasive species cannot be used unless a plan to prevent and monitor their spread is available and implemented."
40	Indicator 7.1.6	What happens when in countries like Mexico, the same oil palm is considered an invasive species?
41	Indicator 7.1.6	Should include national and international, as there should be consistency in the international information that can be use to validate the scope. To make the input in the requirements feedback column
42	Indicator 7.1.6	It would be preferable to not only restrict the introduction of invasive species, but also to support the preservation of native species, and even better supporting species with endangered status, in areas selected for remediation and reforestation. Feedback Type: Technical
43	Indicator 7.1.6	Reference to pesticides (or any agrochemicals) application following MSDS should be added. Feedback Type: Technical
44	Indicator 7.1.6	Clarify in which activities invasive species are prohibited, for example: cover crop planting, planting of living fences, reforestation, etc.
45	Indicator 7.1.6	Request to use Draft 3 to avoid misunderstandings in the use of 'and/or': 7.1.6 The introduction of species referenced in the Global Invasive Species Database and/or CABI.org and/or national regulations is prohibited. If the use of such species by the UoC has already occurred before November 2023, the Certification Unit must demonstrate compliance with internationally accepted scientific protocols or national regulations/guidelines/practices.
46	Indicator 7.1.6	Request to use Draft 3 to avoid misunderstandings in the use of 'and/or': 7.1.6 The introduction of species referenced in the Global Invasive Species Database and/or CABI.org and/or national regulations is prohibited. If the use of such species by the UoC has already occurred before November 2023, the Certification Unit must demonstrate compliance with internationally accepted scientific protocols or national regulations/guidelines/practices.
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48	Indicator 7.1.6	Request to use Draft 3 to avoid misunderstandings in the use of 'and/or': 7.1.6 The introduction of species referenced in the Global Invasive Species Database and/or CABI.org and/or national regulations is prohibited. If the use of such species by the UoC has already occurred before November 2023, the Certification Unit must demonstrate compliance with internationally accepted scientific protocols or national regulations/guidelines/practices.
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52	Indicator 7.1.6	Request to use Draft 3 to avoid misunderstandings in the use of 'and/or': 7.1.6 The introduction of species referenced in the Global Invasive Species Database and/or CABI.org and/or national regulations is prohibited. If the use of such species by the UoC has already occurred before November 2023, the Certification Unit must demonstrate compliance with internationally accepted scientific protocols or national regulations/guidelines/practices.
53	Indicator 7.1.6	Suggest to maintain reference CABI.org (existing as per P&C 2018). Propose to update new CABI website for invasive species and/or species prohibited in the Informative Guidance as follow : https://www.cabidigitallibrary.org/product/QI
54	Indicator 7.1.6	Indicator 7.1.6. Request to use Draft 3 to avoid misunderstanding in using "and/or" 7.1.6 The introduction of species referenced in the Global Invasive Species Database and/or CABI.org and/or national regulation is prohibited. Where the use of such species by the UoC was already in place before November 2023, the Unit of Certification shall demonstrate compliance with internationally accepted scientific protocols or national regulations/guidelines/ practices.

No	Criteria/Indicator	Comment (English)
55	Indicator 7.1.6	<p>Request to use Draft 3 to avoid misunderstandings in the use of 'and/or':</p> <p>7.1.6 The introduction of species referenced in the Global Invasive Species Database and/or CABI.org and/or national regulations is prohibited. If the use of such species by the UoC has already occurred before November 2023, the Certification Unit must demonstrate compliance with internationally accepted scientific protocols or national regulations/guidelines/practices.</p>
56	Indicator 7.1.6	<p>Request to use Draft 3 to avoid misunderstandings in the use of 'and/or':</p> <p>7.1.6 The introduction of species referenced in the Global Invasive Species Database and/or CABI.org and/or national regulations is prohibited. If the use of such species by the UoC has already occurred before November 2023, the Certification Unit must demonstrate compliance with internationally accepted scientific protocols or national regulations/guidelines/practices.</p>
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58	Indicator 7.1.6	<p>Request to use Draft 3 to avoid misunderstandings in the use of 'and/or':</p> <p>7.1.6 The introduction of species referenced in the Global Invasive Species Database and/or CABI.org and/or national regulations is prohibited. If the use of such species by the UoC has already occurred before November 2023, the Certification Unit must demonstrate compliance with internationally accepted scientific protocols or national regulations/guidelines/practices.</p>
59	Indicator 7.1.6	<p>7.1.6 The introduction of species referenced in the Global Invasive Species Database and/or CABI.org and/or national regulation is prohibited. Where the use of such species by the UoC was already in place before November 2023, the Unit of Certification shall demonstrate compliance with internationally accepted scientific protocols or national regulations/guidelines/ practices.</p>
60	Indicator 7.1.6	<p>7.1.6</p> <p>Request to use Draft 3 to avoid misunderstandings in the use of 'and/or':</p> <p>7.1.6 The introduction of species referenced in the Global Invasive Species Database and/or CABI.org and/or national regulations is prohibited. If the use of such species by the UoC has already occurred before November 2023, the Certification Unit must demonstrate compliance with internationally accepted scientific protocols or national regulations/guidelines/practices.</p>

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61	Indicator 7.1.6	Request to use Draft 3 to avoid misunderstanding in using "and/or" 7.1.6 The introduction of species referenced in the Global Invasive Species Database and/or CABI.org and/or national regulation is prohibited. Where the use of such species by the UoC was already in place before November 2023, the Unit of Certification shall demonstrate compliance with internationally accepted scientific protocols or national regulations/guidelines/ practices.
62	Indicator 7.1.6	Indicator 7.1.6: Request to use Draft 3 to avoid misunderstanding in using "and/or" The introduction of species referenced in the Global Invasive Species Database and/or CABI.org and/or national regulation is prohibited. Where the use of such species by the UoC was already in place before November 2023, the Unit of Certification shall demonstrate compliance with internationally accepted scientific protocols or national regulations/guidelines/practices.
63	Indicator 7.1.6	Reference to CABI and the Global Invasive Species Database has been removed here, apparently due to concerns with referencing a third party. However, the relevant ISEAL requirement on ensuring legal agreements applies to implementing partners. It is not clear that simply referencing datasets should cause a complication here. It seems that removing reference to these data sources will reduce standardisation of approaches taken by companies and weaken this indicator. Feedback type: Limitation/Justification
64	Indicator 7.1.7	follow INA NI format, Pedoman Khusus (Specific Guidance) dan Pedoman Umum (General Guidance). Checklist only not compliance requirement. It is also to align with PRISMA
65	Indicator 7.1.7	How to address <i>Mucuna sp.</i> in plantation?
66	Indicator 7.1.7	Suggest to revise the cut-off date and understand the process, there was concerns on to those members who are certified after November 2023/November 2024 (when P&C is out)
67	Indicator 7.1.7	The criterion establishes taking "protocols" as a reference, however, it is considered that this definition is limiting and could generate confusion at the time of the audit, even the same informative guide refers to "guidelines" and not "protocols". Proposal for change: In case the use of the invasive or prohibited species was already implemented before November 2024, the Certification Unit will manage the use of this species in line with internationally accepted scientifically based scientific protocols or national regulations.
68	Indicator 7.1.7	Does this indicator refer to species that were not classified as invasive or prohibited before November 2024
69	Indicator 7.1.7	The indicator is not clear when it refers to international scientific protocols.
70	Indicator 7.1.8	For example there are 5 items in the Checklist, but only comply to 4 items. How to determine the NC? Who determine the compliance or not determined by Prisma or the Auditor
71	Indicator 7.1.8	"Control' open burning. to add 'control'
72	Indicator 7.1.8	Open burning' to replace w "Control open burning' or 'fire'
73	Indicator 7.1.8	suggest to maintain 'Use of fire' instead of 'open burning'
74	Indicator 7.1.8	to relook 'open burning' to 'fire'
75	Indicator 7.1.8	To replace 'Open Burning' terms with 'Use of Fire'.
76	Indicator 7.1.8	Suggestion to change: "Open burning for pest or disease control is strictly prohibited."

No	Criteria/Indicator	Comment (English)
77	Indicator 7.1.8	To add back the clause what constitutes exceptional circumstances - i.e. "where no other effective methods exist, and with prior approval of government authorities".
78	Indicator 7.1.8	Reference to requiring prior government approval has been removed as a requirement - justification and implications of this are not clear? Feedback type: Limitation/Justification
79	Criteria 7.2	Proposed 'Waste management 'AND' disposal plan'
80	Criteria 7.2	To emphasise on the 'quantification' of waste generated, disposed to landfill and/or diverted from landfill
81	Criteria 7.2	The term "circular economy" is much broader than just waste management (as the indicators in 7.2 suggest), but rather encompassing efficient/smart use of raw materials (including water, energy), smart product design, processing, etc (many of them are linked to criteria 7.5 and 7.6). You may want to revisit this, and if the term "circular economy" is going to be introduced here, there is an EU and OECD guideline for circular economy indicators. Feedback type: Implementability/Auditability
82	Criteria 7.2	The term "circular economy" is too broad to be applied in waste management; it would be better to focus specifically on waste management, which includes programs for reducing, recycling, reusing, and disposing of waste.
83	Criteria 7.2	Is it impossible for a UoC to adopt "circular economy"
84	Criteria 7.2	Consider incorporating a metric for the total weight of waste generated, measured in metric tons, along with a breakdown by waste composition (see GRI Disclosure 306-3 Waste generated).
85	Criteria 7.2	Reference is made in the Criterion to 'circular economy' but not in any of the indicators, and definition of how this term should be interpreted not provided in Definitions. Further clarity of intention of this would be useful Feedback type: Technical
86	Indicator 7.2.1	Please revise the wording for clarity, too much "and". Which one to reduce, reuse, recycle? (SW)
87	Indicator 7.2.1	Strict to circular economy which cover any bias. Define circular economy (DH) Can we stop at Circular Economy? with clarity in definition (SW)
88	Indicator 7.2.1	The using terms of circular economy on this indicator shall be reconsidered as the waste management in this regard not yet taking into account the economic principle
89	Indicator 7.2.1	Waste management and disposal plan - usually these two already come as one. Training of worker to be emphasise
90	Indicator 7.2.1	The word AND would indicate both waste management and disposal plan is two separate plans.
91	Indicator 7.2.1	The disposal is another phase in waste management, why is it made separate here

No	Criteria/Indicator	Comment (English)
92	Indicator 7.2.1	7.2.3. Disagree with 'Disposal' in 'Waste Management and Disposal Plan'. Recovery of waste should be the focus and disposal the last option.
93	Indicator 7.2.1	suggest to maintain 'Waste Management Plan'. Reason - Disposal is part of waste management
94	Indicator 7.2.1	Suggest to rephrase to "The UoC shall develop and implement a WMP and its disposa (where applicable) to reduce"
95	Indicator 7.2.1	Suggest to remove "disposal" from "Waste Management and Disposal Plan" as the word for disposal can lead to intepretation
96	Indicator 7.2.1	To redraft the sentence 'The Plan shall include responsible disposal of waste/by-products.' into 'The Plan shall include responsible disposal of waste/by-products, where applicble.' as by-products from mill / estate were reused k for nutrient recycling.
97	Indicator 7.2.2	Interpretation on optimise could be differents. Need to be clearer on definition of optimise
98	Indicator 7.2.2	The term 'optimize' does not clearly communicate the intention of the indicator
99	Indicator 7.2.2	To emphasise use of organic fertilisers and regenerative agriculture
100	Indicator 7.2.2	Nutrient recycling plan not meant to optimise the use of inorganic fertilizers
101	Indicator 7.2.2	To clarify the changes from 'optimal use of inorganic fertiliser' to 'recycling plan to optimise use of inorganic fertilizer'.
102	Indicator 7.2.2	Suggest to define and more clearly on the 'Optimise the use of organic fertiliser'
103	Indicator 7.2.2	Optimize the definition of inorganic fertilization? All disposals should be discarded. The definitions for criteria and indicators are different.
104	Indicator 7.2.2	I would like to suggest a technical amendment to Principle 7.2.2. (sheet "Principle 7", cell E12). Slow release fertilizers are one of several fertilizer technologies, as the sentence suggests. It would be more precise to name all of these technologies "enhanced efficiency fertilizers". This category includes stabilized fertilizers, slow release fertilizers, controlled release fertilizers and water soluble fertilizers. The International Fertilizer Association adopts this nomenclature. I attach a link to the IFA report, just so you know, but it's only available to members.
105	Indicator 7.2.2	Is this criterion created for all types of soil, or are there exceptions? Should peat soil also have a plan for nutrient recycling?
106	Indicator 7.2.2	To replace the term "optimise" in the indicator (note : NO improvement was proposed)
107	Indicator 7.2.2	Should revert back to the previous wordings (Draft 3 and RSPO P&C 2018) to capture the needs to reuse/recycle mill effluents Feedback Type: Technical

No	Criteria/Indicator	Comment (English)
108	Indicator 7.2.2	EFB and POME components are missing in this indicator as opposed to the 2018's standards. There's a language issue here (i.e., syntax) that may cause the risk of misinterpretation on the indicator's intention. The focus should be on optimising nutrient recycling and not on the optimisation of inorganic fertiliser usage. Suggest to revert to D3. Feedback Type: Text/Wordsmithing, Technical
109	Indicator 7.2.2	The 2018 P&C included reference to EFB and POME and palm residue recycling - these should be reinstated as requirements Feedback type: Limitation/Justification
110	Indicator 7.2.3	What it shall be gender consideration in this indicator? (SW) Reduced duplication of gender consideration (DH)
111	Indicator 7.2.3	How to interpret 'gender-specific need'?
112	Indicator 7.2.3	Suggest not to include 'gender-specific need'
113	Indicator 7.2.3	Dont stop at gender but the impact of miss-handling of waste & disposal
114	Indicator 7.2.3	Waste management training should not be separated by gender, as gender issues have already been addressed in other relevant indicators.
115	Indicator 7.2.3	the indicator should be upgraded to C Critical
116	Indicator 7.2.3	This is impossible to audit or implement. What would be the evidence for job-specific training on waste management? Is the UoC expected to have specific training programs for every job? What was the intent here?
117	Indicator 7.2.4	Why is "watercourses" mentioned, but not other natural ecosystems: lakes, grasslands, forests
118	Indicator 7.2.4	we don't understand. Open burning for measure for waste disposal?
119	Indicator 7.2.4	To include In direct leachate from waste disposal
120	Indicator 7.2.4	To replace 'Open Burning' terms with 'Use of Fire'.
121	Indicator 7.2.4	Suggestion to change: "is prohibited"
122	Indicator 7.2.4	The indicator needs more clarity (note : NO improvement was proposed)
123	Indicator 7.2.4	Why are watercourses mentioned but not other natiral habitats?
124	Criteria 7.3	To be deleted the word of 'replanting'. Change to 'New Planting'
125	Criteria 7.3	Includes scope of replanting (... no replaniting on steep slopes). Include no replanting in 7.3.2
126	Criteria 7.3	Suggest to replace the wording Replanting with New Planting (especially on UoC that undergoing replanting activities).
127	Criteria 7.3	To delete the word "replanting" and changed it to "new planting" on steep terrain. Propose to revert to the intention of Draft 3 where replanting on steep terrain is permitted, however no extensive replanting on steep slope with clear definition on extensive replanting
128	Criteria 7.3	To delete the word "replanting" and changed it to "new planting" on steep terrain

No	Criteria/Indicator	Comment (English)
129	Criteria 7.3	Criteria 7.3 and Criteria 7.4: It is essential to establish clear and rigorous criteria on which year new plantations can be accepted, without offering flexibility regarding compensation, for deforested hectares to be certified by the RSPO, especially if the previous land was primary forest. In addition, a more precise classification of land type (primary forest, secondary forest, degraded forest, food crops, etc.) is needed so that the compensation scheme adequately reflects the environmental and social value of different land types.
130	Criteria 7.3	To delete the word "replanting" and changed it to "new planting" on steep terrain
131	Criteria 7.3	<p>It appears that almost all of criterion 7.4 from the 2018 P&C has been removed from this version of the standard. This referred to maintaining and improving soil fertility across all soil types. The new version of 7.3, by contrast, is focused specifically on the erosion of fragile and marginal soils. It is not clear why requirements around broader soil health have been removed and this appears to be a weakening of the 2018 P&C. The requirements under 7.4 (2018 P&C) should be reinstated or clear justification provided for why this has been done.</p> <p>Feedback type: Limitation/Justification</p> <p>Note: Weakening of the P&C</p>
132	Criteria 7.3	<p>All of criterion 7.6 from the 2018 P&C has been removed here and it is not clear why. This covered soil surveys and site planning, which do not appear to have been incorporated elsewhere to the same extent. The requirements under 7.6 (2018 P&C) should be reinstated or clear justification provided for why this has been done.</p> <p>Feedback type: Limitation/Justification</p> <p>Note: Weakening of the P&C</p>
133	Indicator 7.3.1	<p>Some element that was in PC2018 is now not appear/highlight/mentioned in proposed. eg using soil & topographic assessment to guide development of drainage was kept silent - maybe missed out by auditor.</p> <p>Also about continuity of data management - risk of misinterpreted</p>
134	Indicator 7.3.1	The word "conserved" should be better define in term of the management of the marginal soils.
135	Indicator 7.3.1	To revert back to draft 3, due to conservation should not be the key intent and there should be more focused on soil health.+ The rehabilitation on marginal and fragile soil should be left to the UoC to manage
136	Indicator 7.3.1	The word "conserved" should be better define in term of the management of the marginal soils.
137	Indicator 7.3.1	Not agreeable to the term "conserved" in the indicator. Proposed to refer to Draft 3.
138	Indicator 7.3.1	The word "conserved" should be better define in term of the management of the marginal soils.
139	Indicator 7.3.1	Suggest to reword as follow: Areas with steep terrain, marginal soils, and fragile soils should be identified and mapped through soil and topographic assessments, and managed according to a soil management plan that outlines best practices for soil conservation
140	Indicator 7.3.1	The word "conserved" should be better define in term of the management of the marginal soils. Instead of "conserved", the word should be replaced with "managed".

No	Criteria/Indicator	Comment (English)
141	Indicator 7.3.2	Pengembangan baru. As a SH, there would be some part of my land with steep terrain area. Need more clarification on the degree of steep terrain that is prohibited for planting.
142	Indicator 7.3.2	Replanting policy. In the old standard replanting at steep terrain is not allowed. But in the new standard, it seems to not be there, can we replant on those areas?
143	Indicator 7.3.2	Please explain new development.
144	Indicator 7.3.2	Are new/ facilities like communication towers considered part of new development in the context of steep terrain?
145	Indicator 7.3.2	Any scientific reference (backgorund note) that the new developments in the steep terrain is not allowed.
146	Indicator 7.3.2	Propose to remove 'New development' of oil palm on steep terrain. (New plantings is clear enough)
147	Indicator 7.3.2	To revert back to draft 3, members agree with the new indicator with "no new planting" but strongly recommended to remove "new development" as they would operationally build watchtower i.e. biodiversity observation.
148	Indicator 7.3.2	Unclear whether the wording between "shall not conduct new planting" and "shall avoid new planting" is meant to be equivalent or not. Feedback type:Text/Wordsmithing
149	Indicator 7.3.2	To remove the term "new development". Proposed to refer to Draft 3.
150	Indicator 7.3.2	Suggest to add in the informative guidance that to allowed to construct public infrastructure on sloping terrain, such as telecommunications towers.
151	Indicator 7.3.2	There was previously (2018) a requirement for no replanting on steep terrain, whereas the current version only refers to new planting. Replanting (of oil palm) should not be allowed on steep terrain either, and this should be reinstated here Feedback type: Limitation/Justification Note: Weakening of the P&C
152	Indicator 7.3.3	Marginal soils & fragile soils different from peat and steep slope. New planting is still possible if soil health recover - refer to P&C 2018)
153	Indicator 7.3.3	Unclear whether the wording between "shall not conduct new planting" and "shall avoid new planting" is meant to be equivalent or not. Feedback type:Text/Wordsmithing
154	Indicator 7.3.3	It is proposed to revert to the wording in P & C 2018, which states: "Avoid excessive planting in marginal and vulnerable areas, or if necessary, it can be done by implementing a land management plan based on best practices."

No	Criteria/Indicator	Comment (English)
155	Indicator 7.3.3	shall avoid is a vague wording (the requirement refers to making the effort to avoid, but not necessarily prohibit the conduct) Feedback Type: Implementability/Auditability
156	Indicator 7.3.3	Soil fertility component is missing. Inclusion of this should be clearer or mentioned explicitly in other indicators as an alternative to retain the intent stipulated in 2018. Feedback Type: Technical
157	Indicator 7.3.3	The usage of 'shall avoid' does not seem to be consistent throughout the indicators within this criterion. Suggest to realign and standardise. Feedback Type: Text/Wordsmithing
158	Criteria 7.4	Grower members think "conserve" is a positive word.
159	Criteria 7.4	Why say planted peatlands should be "managed responsibly"? If they are essentially planted area, then they should meet the rest of the criteria as any other area... It is the conversion issue, and protection of unplanted peatlands that is critical here Feedback type:Text/Wordsmithing
160	Indicator 7.4.1	and / or development on peatland... "How about new house for workers. new facility etc."
161	Indicator 7.4.1	RSPO might drop out some important indicator; peatland
162	Indicator 7.4.1	Compliance Checklist: "Should refer to Peat Audit guidance 2019 or any updated version for mandatory elements"
163	Indicator 7.4.2	Compliance Checklist: "Should refer to Peat Audit guidance Auditor should verify that map and data submitted to RSPO is up to date and in line with Guidance for Peat inventory for RSPO Reporting"
164	Indicator 7.4.3	How about if construction of drain which facilitate hydrology in peat ecosystem? Why should it be prohibited?
165	Indicator 7.4.3	Except there are instruction from government it should be granted
166	Indicator 7.4.3	"shall be prohibited" should be changed to "shall be properly assess to identify its risk & mitigation plan under strict control
167	Indicator 7.4.3	Word "disrupt".... including new construction of drainage, roads, ...
168	Indicator 7.4.3	Strongly recommended to specify on unplanted
169	Indicator 7.4.3	There must be exceptions for activities conducted for the public interest and national interest.

No	Criteria/Indicator	Comment (English)
170	Indicator 7.4.3	To add to the indicator that "infrastructure development classified as non-cooperative development is exempt from this provision." This is to accommodate developments carried out by the government for the public interest (e.g., roads, canals, etc.).
171	Indicator 7.4.3	The "shall be prohibited" should be changed to "shall be properly assess to identify its risk& mitigation plan under strict control" The current wording is also have issues with auditability as how to define the statement "may disrupt peatland ecosystem" without requiring assessment to prove whether its disrupt or not.
172	Indicator 7.4.3	The "shall be prohibited" should be changed to "shall be properly assess to identify its risk& mitigation plan under strict control" The current wording is also have issues with auditability as how to define the statement "may disrupt peatland ecosystem" without requiring assessment to prove whether its disrupt or not.
173	Indicator 7.4.3	Indicator: "The Unit of Certification shall prohibit any activities that may disrupt peatland ecosystem integrity or hydrology. This shall include the any-potential construction of drains, roads, dams, bunds, levees, and/or power lines on unplanted set-aside peatlands." Compliance Checklist: "Should refer to Peat Audit guidance 2019 or any updated version for mandatory elements"
174	Indicator 7.4.3	Proposed that development for non-corporate interests, such as community needs and government programs, can be accommodated. This should be stated as follows: "The Unit of Certification must prohibit any activities that could disrupt the integrity of the ecosystem or hydrology of peatland. Prohibited activities may include the construction of drainage, roads, dams, embankments, flood control levees, and/or electrical networks on reserved and unplanted peatland, unless the development is not for corporate interests (non-corporate land clearance)."
175	Indicator 7.4.3	Proposed that development for non-corporate interests, such as community needs and government programs, can be accommodated. This should be stated as follows: "The Unit of Certification must prohibit any activities that could disrupt the integrity of the ecosystem or hydrology of peatland. Prohibited activities may include the construction of drainage, roads, dams, embankments, flood control levees, and/or electrical networks on reserved and unplanted peatland, unless the development is not for corporate interests (non-corporate land clearance)."
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No	Criteria/Indicator	Comment (English)
177	Indicator 7.4.3	Proposed that development for non-corporate interests, such as community needs and government programs, can be accommodated. This should be stated as follows: "The Unit of Certification must prohibit any activities that could disrupt the integrity of the ecosystem or hydrology of peatland. Prohibited activities may include the construction of drainage, roads, dams, embankments, flood control levees, and/or electrical networks on reserved and unplanted peatland, unless the development is not for corporate interests (non-corporate land clearance)."
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182	Indicator 7.4.3	<p>The statement "shall be prohibited" should be changed to "shall be properly assess to identify its risk& mitigation plan under strict control"</p> <p>The current wording is also have issues with auditability as how to define the statement "may disrupt peatland ecosystem" without requiring assessment to prove whether its disrupt or not.</p>
183	Indicator 7.4.3	Proposed that development for non-corporate interests, such as community needs and government programs, can be accommodated. This should be stated as follows: "The Unit of Certification must prohibit any activities that could disrupt the integrity of the ecosystem or hydrology of peatland. Prohibited activities may include the construction of drainage, roads, dams, embankments, flood control levees, and/or electrical networks on reserved and unplanted peatland, unless the development is not for corporate interests (non-corporate land clearance)."

No	Criteria/Indicator	Comment (English)
184	Indicator 7.4.3	Indicator 7.4.3 Proposed that development for non-corporate interests, such as community needs and government programs, can be accommodated. This should be stated as follows: "The Unit of Certification must prohibit any activities that could disrupt the integrity of the ecosystem or hydrology of peatland. Prohibited activities may include the construction of drainage, roads, dams, embankments, flood control levees, and/or electrical networks on reserved and unplanted peatland, unless the development is not for corporate interests (non-corporate land clearance)."
185	Indicator 7.4.4	To be guided by RSPO BMP. since there is a BMP from RSPO
186	Indicator 7.4.4	To revert draft 3, members mentioned set-aside peat should not be touched after assessment, thus the plan would be redundant.
187	Indicator 7.4.4	Have issues with the term "management plan". Proposed to revert to Draft 3.
188	Indicator 7.4.4	<p>Indicator: "The Unit of Certification shall develop and implement a Peatland Conservation and Management Plan to protect and manage all set-aside (unplanted) peatland. [this is significantly changed from 7.4.4 in draft 3]</p> <p>Suggest to replace with original 7.4.4(C) The Unit of Certification shall protect and manage all set-aside (unplanted) peatlands, guided by the RSPO Manual on BMPs for Management and Rehabilitation of Peatlands.</p> <p>Preparation of an integrated mangement plan is required for all conservation areas including peatlandfs under indicator 7.7.2 - although requirement for mangement plan is not yet in the indicator wording"</p> <p>Informative Guidance: "The "RSPO Manual on BMPs for Management and Rehabilitation of Peatlands" should be used as a guide in peatland protection, rehabilitation, and conservation."</p> <p>Compliance Checklist: "Should refer to Peat Audit guidance 2019 or any updated version for mandatory elements"</p>
189	Indicator 7.4.4	For 7.4.4 and 7.4.5 must be (C), change 2018 to 2019 as the BMPs published on 2019 and there need word to reference audit guidance. In addition 7.4.4 need to reword to The Unit of Certification shall protect and manage all set-aside (unplanted) peatlands, guided by the RSPO Manual on BMPs for Management and Rehabilitation of Peatlands version 2 (2019) and associated audit guidance. For 7.4.6 standardize to 15 years after planting or replanting- as 5 years before replanting is impossible to audit.
190	Indicator 7.4.4	<p>This states that unplanted peat should be managed according to guidelines for existing plantations on peat - does this guidance adequately cover unplanted peat?</p> <p>Feedback type: Technical</p>
191	Indicator 7.4.5	the indicator should be upgraded to C Critical

No	Criteria/Indicator	Comment (English)
192	Indicator 7.4.5	<p>Indicator: "Where fire prevention measures in peatland areas are required, any peat disturbance activities shall be done in full compliance with national regulation. [this should not be an indicator - just guidance on possible exemption for the Indicator 7.4.3 - also should refer to guidance in RSPO BMP manuals not national regulations as most countries have no regulation on fire prevention measures in peatlands]</p> <p>Alternatively if there is a desire to have an indicator on fire prevention - then the following is proposed: "The UoC shall develop and implement a peatland fire prevention plan to include all aspects of fire prevention and control in peatlands in the UoC and immediately adjacent lands" The text currently in 7.4.5 could be in the guidance to this"</p> <p>Compliance Checklist: "Should refer to Peat Audit guidance 2019 or any updated version for mandatory elements"</p>
193	Indicator 7.4.6	Propose that 5 years was calculated from the DA not based on approval (SW). 5 years was calculated from the submission not from the approval as the approval process can taking times (DH)
194	Indicator 7.4.6	5 years before replanting
195	Indicator 7.4.6	To add footnote under compliance requirement/informative guidance as members mentioned to add more guidance on DA i.e. if 2 years down the line and the oil palm dies do they need to do DA.
196	Indicator 7.4.6	To change the date of DA submission (at least 5 years) to be used as a time reference and not the date of DA approval tambahkan dari awal DA
197	Indicator 7.4.6	Considering the lengthy document review process, it is proposed that the Drainability Assessment reporting be deemed to meet the requirements of indicator 7.4.6 at the time the report is submitted to RSPO, rather than at the time of its approval.
198	Indicator 7.4.6	Guidance is needed on the indicator.

No	Criteria/Indicator	Comment (English)
199	Indicator 7.4.6	<p>Indicator: "The Unit of Certification shall undertake a Drainability Assessment [using the RSPO Drainability Assessment procedure] to determine the [suitability of replanting on peatland] feasibility of replanting.</p> <p>Where assessment result indicates a phasing out of oil palm cultivation of at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat is required, the UoC shall have a plan to replace with crops suitable for a higher water table (paludiculture) or to rehabilitate with natural revegetation.</p> <p>Note it is essential to refer to the RSPO drainability assessment procedure as that is the formal procedure developed by RSPO and utilised for the past 6 years. No viable alternative to this has been suggested by any RSPO member and all RSPO members are currently complying"</p> <p>Compliance Requirements: "Implementation The Drainability Assessment shall be conducted at least 15 years after the initial planting or first cycle. For the subsequent cycle of replanting on peat, a Drainability Assessment shall be conducted and approved at least five years prior to replanting.[standardise to 15 years after planting or replanting- as 5 years before replanting is impossible to audit]</p> <p>Where the assessment result indicates a phasing out of oil palm cultivation of at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat, the Unit of Certification shall have a plan to replace it with crops suitable for a higher water table (paludiculture) or to rehabilitate it with natural revegetation."</p> <p>Informative Guidance: "The "RSPO Drainability Assessment Procedure" shall be used to implement Indicator 7.4.6. [this is mandatory not informative]"</p> <p>Compliance Checklist: "The UOC must have complied with the requirements of the RSPO Drainability assessment procedure. In cases where the assessment procedure has indicated that oil palm cannot be replanted, the auditor to verify that measures have been taken to raise the water level and replace the oil palm with crops suitable for a higher water table or rehabilitate with natural vegetation at the same time as other areas within the unit are replanted."</p>

No	Criteria/Indicator	Comment (English)
200	Indicator 7.4.6	<p>Proposed to retain the provisions of indicator 7.7.5 P&C RSPO 2018, stating that replanting does not need to wait for the report to be approved by RSPO, but rather the grower should submit the report, as RSPO does not have rules regarding the timeline for completing the Review of the Drainability Assessment report.</p> <p>Thus, it becomes: 'For plantations established on peatland, the drainability assessment is conducted following the RSPO Drainability Assessment Procedure or another RSPO-recognized method, at least five years prior to replanting. The results of this assessment are used to establish the timeline for future replanting and to phase out oil palm planting for at least 40 years, or two cycles, whichever is longer, before reaching the natural gravity drainage limit for peatland. When oil palm is removed, it should be replaced with plants suitable for higher water levels (paludiculture) or rehabilitated with natural vegetation.'</p>
201	Indicator 7.4.6	<p>Proposed to retain the provisions of indicator 7.7.5 P&C RSPO 2018, stating that replanting does not need to wait for the report to be approved by RSPO, but rather the grower should submit the report, as RSPO does not have rules regarding the timeline for completing the Review of the Drainability Assessment report.</p> <p>Thus, it becomes: 'For plantations established on peatland, the drainability assessment is conducted following the RSPO Drainability Assessment Procedure or another RSPO-recognized method, at least five years prior to replanting. The results of this assessment are used to establish the timeline for future replanting and to phase out oil palm planting for at least 40 years, or two cycles, whichever is longer, before reaching the natural gravity drainage limit for peatland. When oil palm is removed, it should be replaced with plants suitable for higher water levels (paludiculture) or rehabilitated with natural vegetation.'</p>
202	Indicator 7.4.6	<p>Proposed to retain the provisions of indicator 7.7.5 P&C RSPO 2018, stating that replanting does not need to wait for the report to be approved by RSPO, but rather the grower should submit the report, as RSPO does not have rules regarding the timeline for completing the Review of the Drainability Assessment report.</p> <p>Thus, it becomes: 'For plantations established on peatland, the drainability assessment is conducted following the RSPO Drainability Assessment Procedure or another RSPO-recognized method, at least five years prior to replanting. The results of this assessment are used to establish the timeline for future replanting and to phase out oil palm planting for at least 40 years, or two cycles, whichever is longer, before reaching the natural gravity drainage limit for peatland. When oil palm is removed, it should be replaced with plants suitable for higher water levels (paludiculture) or rehabilitated with natural vegetation.'</p>
203	Indicator 7.4.6	<p>Proposed to retain the provisions of indicator 7.7.5 P&C RSPO 2018, stating that replanting does not need to wait for the report to be approved by RSPO, but rather the grower should submit the report, as RSPO does not have rules regarding the timeline for completing the Review of the Drainability Assessment report.</p> <p>Thus, it becomes: 'For plantations established on peatland, the drainability assessment is conducted following the RSPO Drainability Assessment Procedure or another RSPO-recognized method, at least five years prior to replanting. The results of this assessment are used to establish the timeline for future replanting and to phase out oil palm planting for at least 40 years, or two cycles, whichever is longer, before reaching the natural gravity drainage limit for peatland. When oil palm is removed, it should be replaced with plants suitable for higher water levels (paludiculture) or rehabilitated with natural vegetation.'</p>

No	Criteria/Indicator	Comment (English)
204	Indicator 7.4.6	<p>Proposed to retain the provisions of indicator 7.7.5 P&C RSPO 2018, stating that replanting does not need to wait for the report to be approved by RSPO, but rather the grower should submit the report, as RSPO does not have rules regarding the timeline for completing the Review of the Drainability Assessment report.</p> <p>Thus, it becomes: 'For plantations established on peatland, the drainability assessment is conducted following the RSPO Drainability Assessment Procedure or another RSPO-recognized method, at least five years prior to replanting. The results of this assessment are used to establish the timeline for future replanting and to phase out oil palm planting for at least 40 years, or two cycles, whichever is longer, before reaching the natural gravity drainage limit for peatland. When oil palm is removed, it should be replaced with plants suitable for higher water levels (paludiculture) or rehabilitated with natural vegetation.'</p>
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206	Indicator 7.4.6	<p>Indicator 7.4.6. To avoid delays in Replanting, the date of Drainability Assessment (DA) submission is to be used for the time reference and not the date of DA approval.</p>
207	Indicator 7.4.6	<p>Proposed to retain the provisions of indicator 7.7.5 P&C RSPO 2018, stating that replanting does not need to wait for the report to be approved by RSPO, but rather the grower should submit the report, as RSPO does not have rules regarding the timeline for completing the Review of the Drainability Assessment report.</p> <p>Thus, it becomes: 'For plantations established on peatland, the drainability assessment is conducted following the RSPO Drainability Assessment Procedure or another RSPO-recognized method, at least five years prior to replanting. The results of this assessment are used to establish the timeline for future replanting and to phase out oil palm planting for at least 40 years, or two cycles, whichever is longer, before reaching the natural gravity drainage limit for peatland. When oil palm is removed, it should be replaced with plants suitable for higher water levels (paludiculture) or rehabilitated with natural vegetation.'</p>

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208	Indicator 7.4.6	<p>Proposed to retain the provisions of indicator 7.7.5 P&C RSPO 2018, stating that replanting does not need to wait for the report to be approved by RSPO, but rather the grower should submit the report, as RSPO does not have rules regarding the timeline for completing the Review of the Drainability Assessment report.</p> <p>Thus, it becomes: 'For plantations established on peatland, the drainability assessment is conducted following the RSPO Drainability Assessment Procedure or another RSPO-recognized method, at least five years prior to replanting. The results of this assessment are used to establish the timeline for future replanting and to phase out oil palm planting for at least 40 years, or two cycles, whichever is longer, before reaching the natural gravity drainage limit for peatland. When oil palm is removed, it should be replaced with plants suitable for higher water levels (paludiculture) or rehabilitated with natural vegetation.'</p>
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211	Indicator 7.4.6	<p>7.4.6 To avoid delays in Replanting, the date of Drainability Assessment (DA) submission is to be used for the time reference and not the date of DA approval</p>

No	Criteria/Indicator	Comment (English)
212	Indicator 7.4.6	<p>7.4.6 Proposed to retain the provisions of indicator 7.7.5 P&C RSPO 2018, stating that replanting does not need to wait for the report to be approved by RSPO, but rather the grower should submit the report, as RSPO does not have rules regarding the timeline for completing the Review of the Drainability Assessment report.</p> <p>Thus, it becomes: 'For plantations established on peatland, the drainability assessment is conducted following the RSPO Drainability Assessment Procedure or another RSPO-recognized method, at least five years prior to replanting. The results of this assessment are used to establish the timeline for future replanting and to phase out oil palm planting for at least 40 years, or two cycles, whichever is longer, before reaching the natural gravity drainage limit for peatland. When oil palm is removed, it should be replaced with plants suitable for higher water levels (paludiculture) or rehabilitated with natural vegetation.'</p>
213	Indicator 7.4.6	To avoid delays in Replanting, the date of Drainability Assessment (DA) submission is to be used for the time reference and not the date of DA approval.
214	Indicator 7.4.6	<p>Indicator 7.4.6 To avoid delays in replanting, it is proposed that the date of submission of the Drainability Assessment (DA) be used as the time reference rather than the date of DA approval. This will help ensure that the replanting process proceeds on schedule. Additionally, to improve clarity, it is important to outline and communicate the review process for the DA, including timelines and responsible parties, to ensure transparency and efficiency in the assessment and approval stages.</p>
215	Indicator 7.4.7	<p>Indicator: "7.4.8(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version2 (2019) and associated audit guidance. [missed out in new version]"</p> <p>Compliance Requirements: "The grower must comply with the management requirements as specified in the RSPO Peatland audit guidance"</p> <p>Informative Guidance: "The RSPO Manual on BMPs for Existing Oil Palm Cultivation on Peat Verion 2 (2019) or any updated version, should be used as a guide for mangement of all areas of oil palm cultivation on peat"</p> <p>Compliance Checklist: "As in Peatland audit guidance 2019 or any updated version."</p>
216	Criteria 7.5	Suggestion to have water management plan. Suggest this req is detailed out in relevance to National Interpretation later on
217	Criteria 7.5	<p>Indicator related to monitoring (and complying to regulation) of waste-water quantity should be re-added</p> <p>Feedback Type: Technical</p>
218	Indicator 7.5.1	For water management, clarity need to be made that requirement is for mill.
219	Indicator 7.5.1	Community engagement's approach must be inclusive in development of the plan

No	Criteria/Indicator	Comment (English)
220	Indicator 7.5.1	To specify priority of UoC responsibility on availability / quality of water to workers
221	Indicator 7.5.1	What will be the role of UoC if quality of water sources to community is poor, due to other upstream activity
222	Indicator 7.5.1	The indicator is not align with the Criteria 7.5 7.5 - to maintain the quality & availability 7.5.1 - to improve the quality & availability
223	Indicator 7.5.1	To remove "consultation"
224	Indicator 7.5.1	Definition and source of communitary water ?
225	Indicator 7.5.1	The use of groundwater or surface water can only be done with the authorization of the Regional Autonomous Corporations and Sustainable Development in Colombia (CAR). The CAR bases its decision to grant or deny such authorization on the availability, demand, quality of the water body, and the potential impacts on communities that depend on that watershed. Therefore, if the company has the authorization, there is no need to consult the community about watershed management, as this is handled by the competent authority, which also requires the company to comply with a program for efficient water use and savings
226	Indicator 7.5.2	What is/are the reason/substance of this new indicator?
227	Indicator 7.5.2	Is it also applicable for eastate without mill? (SW)
228	Indicator 7.5.2	What the meant of publicly in this indicator (SW). Definition of publicly report shall be defined (DH)
229	Indicator 7.5.2	Does this indicator is needed due to there are already available of aggregate data in metric template that was given to the auditor which then incorporated into the public summary report by auditor that can be accessed by public?
230	Indicator 7.5.2	What are/is the correlation of water use with the purpose of Criteria 7.5?
231	Indicator 7.5.2	Why is there a need to report water usage to the public? What is there to report for?

No	Criteria/Indicator	Comment (English)
232	Indicator 7.5.2	<p>7.5.2 water management plan, that the plan is developed with the community. The consultation of the community, this indicator mentioned national legislation. It should be the same national legislation, IT is also captured in other indicators. Water management should also be consistent with National legislation.</p> <p>In Gabon, you don't have the right to plan for certain river flow. That is why to avoid feedback from community, we need to abide the national legislation. The community may request that is not grounded. That is why the management plan need to aligned with the national legislations.</p> <p>My point is on the formulation, for some country we do not have an integrated water management plan. Instead of saying we consult with community, we move the last sentence, it is rather integrated water management plan.</p> <p>NI should deal with that issues, because the applicable provision is provided in the NI.</p> <p>The approach of community engagement/involvement must be inclusive when developing that plan.</p> <p>That criteria is missing. Our proposal : The uoc shall report on water use, efficiency and the collection of CPO in the mill. Publicly report is not appropriate because it is like publishing on our website. It is like GHG. Should use the same wording just like the GHG. For example RSPO reserves the rights to the public. If not, it reads like we have the obligation to disclose.</p>
233	Indicator 7.5.2	Are RSPO PC reports considered public reporting?
234	Indicator 7.5.2	Publicly report' - not all UoC has or publicly. report water footprint. only group level
235	Indicator 7.5.2	To clarify and put guidance note on water use efficiency & water withdrawal footprint
236	Indicator 7.5.2	Publicly report' by each UoC is not practical. Any publicly data is typically reported in the annual report as an aggregated value, not by each UoC
237	Indicator 7.5.2	Suggest to use 'water consumption' and it may applicable to mills
238	Indicator 7.5.2	Member suggested to change wording from "milling water to process per tonne per FFB and to remove "public" and change to "available upon request"
239	Indicator 7.5.2	What media is used for reporting water usage to the public? It would be better to eliminate the requirement for public reporting.
240	Indicator 7.5.2	How should the public be informed? Who is the target audience intended for the publication of this report?
241	Indicator 7.5.2	In Indonesia, the management of water resources and quality is included in the environmental management and monitoring plan documents. Reporting is done every six months to the relevant government authorities. Can this form of reporting be considered as a public report?
242	Indicator 7.5.2	The indicator uses the term "water withdrawal footprint" and the compliance requirement uses the term "renewable water footprint". This generates confusion due to the use of different terms and none of the above refers to terminology known in the guild.

No	Criteria/Indicator	Comment (English)
243	Indicator 7.5.2	In the indicator it refers to: "will be publicly reported" and in the compliance requirement it indicates: "will be registered in the RSPO information system". At the time that the registration with the RSPO is fulfilled, is the condition of the indicator to make it public fulfilled?
244	Indicator 7.5.2	In the indicator it refers to: "will be publicly informed"; it must be clarified to which audience it must communicate and the frequency; or the RSPO information system is sufficient.
245	Indicator 7.5.2	In the requirements for compliance, in subsection C) it refers to "gray water, wastewater", gray water being also wastewater.
246	Indicator 7.5.2	For this indicator, compliance requirements do not refer to accepted methodologies, periodicity of the study and/or profile of the professional who must carry out said study and whether this must be internal or external personnel.
247	Indicator 7.5.2	Provide the definition of "water withdrawal footprint"
248	Indicator 7.5.2	Suggest that this indicator is made relevant for mills only. If talking about efficiency, it is more relevant in the scope of palm oil mills. As the current wording seems to be too general, it could cause confusion and/or conflicting interpretation. Therefore, need to define what is the water "efficiency" means in this scope, in details. Otherwise, suggest to change the word "efficiency" to water "consumption" will be more practical to be reported. Also to define what is acceptable as "publicly report"
249	Indicator 7.5.2	What means to be public? what methodology? to whom? annual frequency?
250	Indicator 7.5.2	Suggest to replace "water use efficiency" and "water withdrawal footprint" to water consumption and water withdrawal , respectively.
251	Indicator 7.5.2	Suggest that this indicator is made relevant for mills only. If talking about efficiency, it is more relevant in the scope of palm oil mills. As the current wording seems to be too general, it could cause confusion and/or conflicting interpretation. Therefore, need to define what is the water "efficiency" means in this scope, in details. Otherwise, suggest to change the word "efficiency" to water "consumption" will be more practical to be reported. Also to define what is acceptable as "publicly report"
252	Indicator 7.5.2	There is a risk of misinterpretation here (language issue) on the intention of this indicator. Is the indicator requiring UoCs to publicly report via websites and other channels? Is it for transparency or is it to gauge UoC's performance? Clearer requirements are required to be detailed out. Feedback Type: Procedural
253	Indicator 7.5.2	This information must be provided periodically to the Regional Autonomous Corporations and Sustainable Development in Colombia (CAR), as they are the competent authorities to monitor watershed management. Therefore, there is no need to make this information public.

No	Criteria/Indicator	Comment (English)
254	Indicator 7.5.2	<p>- It is proposed that Annex 5 of the P&C RSPO 2018 remain included as guidance in completing the RaCP for Certification Units that are still in process.</p> <p>- It is proposed to revert to Indicator 7.9.1 from Draft 3 or P&C RSPO 2018, as it is clear that there is no need to add the term "Natural Forest." It is sufficient to include "primary forest," "HCV," and "HCS," so that the indicator reads: "Land clearing since November 2005 must not damage primary forest or any areas necessary to protect or enhance HCV. Land clearing since November 15, 2018 must not damage HCV or SKT. A historical Land Use Change Analysis (LUCA) must be conducted before opening new land, in accordance with the RSPO LUCA guidance document."</p>
255	Indicator 7.5.2	<p>- Clarification is needed on the form and media for reporting water usage efficiency and the open trace of water extraction.</p> <p>- It is proposed that the wording of the indicator be changed to: "The certification unit has documents regarding water usage and extraction traces, which can be provided to relevant stakeholders upon request."</p>
256	Indicator 7.5.2	<p>- Clarification is needed on the form and media for reporting water usage efficiency and the open trace of water extraction.</p> <p>- It is proposed that the wording of the indicator be changed to: "The certification unit has documents regarding water usage and extraction traces, which can be provided to relevant stakeholders upon request."</p>
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261	Indicator 7.5.2	<p>- Clarification is needed on the form and media for reporting water usage efficiency and the open trace of water extraction.</p> <p>- It is proposed that the wording of the indicator be changed to: "The certification unit has documents regarding water usage and extraction traces, which can be provided to relevant stakeholders upon request."</p>
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267	Indicator 7.5.2	<p>Suggest that this indicator is made relevant for mills only. If talking about efficiency, it is more relevant in the scope of palm oil mills.</p> <p>As the current wording seems to be too general, it could cause confusion and/or conflicting interpretation. Therefore, need to define what is the water "efficiency" means in this scope, in details. Otherwise, suggest to change the word "efficiency" to water "consumption" will be more practical to be reported.</p> <p>Also to define what is acceptable as "publicly report"</p>

No	Criteria/Indicator	Comment (English)
268	Indicator 7.5.2	<p>- Clarification is needed on the form and media for reporting water usage efficiency and the open trace of water extraction.</p> <p>- It is proposed that the wording of the indicator be changed to: "The certification unit has documents regarding water usage and extraction traces, which can be provided to relevant stakeholders upon request."</p>
269	Indicator 7.5.2	<p>- Clarification is needed on the form and media for reporting water usage efficiency and the open trace of water extraction.</p> <p>- It is proposed that the wording of the indicator be changed to: "The certification unit has documents regarding water usage and extraction traces, which can be provided to relevant stakeholders upon request."</p>
270	Indicator 7.5.2	<p>7.5.2</p> <p>- Clarification is needed on the form and media for reporting water usage efficiency and the open trace of water extraction.</p> <p>- It is proposed that the wording of the indicator be changed to: "The certification unit has documents regarding water usage and extraction traces, which can be provided to relevant stakeholders upon request."</p>
271	Indicator 7.5.2	7.5.2 Define the public information process and what information will be included within RSPO.
272	Indicator 7.5.2	For the quantification of the water footprint, will there be a platform similar to PALMGHG (carbon footprint), or will each company do it at its convenience?
273	Indicator 7.5.2	<p>For these data to be useful a standard metric should be required - the 2018 P&C requires measurement of water use per tonne of FFB in the mill, so it would be logical to use his metric still here.</p> <p>On a separate point, while we are supportive of an indicator encouraging transparency, we are not clear why it is being proposed specifically regarding water usage, whereas there is no such requirement for other key data points. There may be a need to review this more widely across the P&C.</p> <p>Feedback type: Technical</p>
274	Indicator 7.5.3	<p>The direct reference to RSPO BMP has been removed. Suggest to reintroduce.</p> <p>Feedback Type: Procedural</p>
275	Indicator 7.5.4	To refer national regulation at compliance requirement
276	Indicator 7.5.4	Too descriptive, proposed to remove temperature. (note : but there was no temperature in the indicator in the mastersheet, maybe already removed during the session).
277	Indicator 7.5.4	<p>There is a need to provide clarity on the scope for this indicator to delineate focus on production or domestic usage.</p> <p>Feedback Type: Text/Wordsmithing, Implementability/Auditability</p>

No	Criteria/Indicator	Comment (English)
278	Indicator 7.5.4	The requirement to monitor Biological Oxygen Demand (BOD) has been removed - this is a key standardised data point and should be reinstated. Feedback type: Limitation/Justification Note: Weakening of the P&C
279	Indicator 7.5.5	This indicator should be a subsequent improvement under the previous indicator, not indicator on its own.
280	Indicator 7.5.5	Indicator can be removed. "Should be considered"; If I just think about it, is that enough? 7.5.4 covers POME treatment
281	Indicator 7.5.5	Auditability 'should considered'. - to refine? threshold? plan?
282	Indicator 7.5.5	What is 'circular economy operations' - to define
283	Indicator 7.5.5	The current statement/wording seems to be too general and too open for interpretation. Need to refine, setting up the threshold and guide how the management plan should be developed.
284	Indicator 7.5.5	The indicator is not implementable, especially for medium growers
285	Indicator 7.5.5	The current statement/wording seems to be too general and too open for interpretation. Need to refine, setting up the threshold and guide how the management plan should be developed.
286	Indicator 7.5.5	7.5.5 The indicator states very general. further guidance to comply to the requirement can be included
287	Indicator 7.5.5	The current statement/wording seems to be too general and too open for interpretation. Need to refine, setting up the threshold and guide how the management plan should be developed.
288	Indicator 7.5.5	Interesting addition but not clear what specifically this indicator is trying to achieve and how it will be audited? The requirement to 'consider' other options seems too vague to audit? Feedback type: Implementability/Auditability
289	Criteria 7.6	We recommend that the updated RSPO Standards include separate reporting for emissions by Scope 1, 2, and 3. It might be beneficial for the updated RSPO Standards to reference the GHG Protocol Corporate Accounting Standard and the GHG Protocol Corporate Accounting and Reporting Standard for Land Sector and Removals Guidance for additional clarity.
290	Indicator 7.6.1	It is cumbersome to insert annual data on palmGHG. Why not make only per yield
291	Indicator 7.6.1	Provided the area / yield is within same amount
292	Indicator 7.6.2	Are RSPO PC reports considered public reporting?
293	Indicator 7.6.2	GHG emissions are typically reported in an aggregated value for the entity, not by UoC. Making it publicly available by UoC is impossible / not practical
294	Indicator 7.6.2	This is for mill per product is CSPO + CSPK - relook this!

No	Criteria/Indicator	Comment (English)
295	Indicator 7.6.2	What media is used for reporting greenhouse gas (GHG) emissions to the public? It would be better to eliminate the requirement for public reporting. The actual emission values are already included in the summary report submitted by the auditor on the RSPO website.
296	Indicator 7.6.2	The indicator states: "the UoC will publicly report its GHG emissions by product..." The compliance requirements state: "GHG emissions shall be recorded in the RSPO information system..." With this, it is not clear whether complying with the registration before the RSPO is already sufficient for compliance with the indicator with respect to public information.
297	Indicator 7.6.2	Be explicit by what he means by "will inform publicly"
298	Indicator 7.6.3	To delete the additional, back to wording used in draft 3
299	Indicator 7.6.3	Since 2014... Should all carbon stocks since 2014 be recalculated? (SW) Suggestion: Add that this requirement only applies once the new Palm GHG Calculator is available. (SW) The Palm GHG will be launched in November 2024. (DH)
300	Indicator 7.6.3	Propose to delete this indicator, because it's already cover in NPP (SW)
301	Indicator 7.6.3	To calculate GHG is nice to have or must to have? I did not see the urgency of GHG calculation based on government regulation and if it is conducted then the result shall attach to the product of RSPO member and recognisedby buyer (SW)
302	Indicator 7.6.3	Remove "Starting 2014". does not add any value
303	Indicator 7.6.3	- carbon stock - does it include the changes pre & post development? - emission from entities? they dont sit in the indicator
304	Indicator 7.6.3	To revert back to draft 3
305	Indicator 7.6.3	To remove below-ground, organic material, and soil carbon as the calculation does not cover this yet .
306	Indicator 7.6.3	Scope - CS esstimation shall incl above-ground, below-ground, organic material & soil carbon Implementation - RSPO GHG Assmnt Procedure for new development' shall be used as reference to conduct CS estimation. It is a whole different thing to measure do we have to start measuring cstock? Soil carbon in carbon stock estimation scope, just below ground biomass based on allometric equations
307	Indicator 7.6.3	to refer back to the RSPO guidance soil stock emission. To not reinvent the wheel.
308	Indicator 7.6.3	Proposed to remove the indicator. No reason / explanation given.
309	Indicator 7.6.3	This is an NPP requirement. Why is this mentioned here, its duplication.

No	Criteria/Indicator	Comment (English)
310	Indicator 7.6.3	<p>Request to remove 'since 2014.'</p> <p>This requirement should not be applied retroactively.</p> <p>Request to remove 'soil carbon, organic matter, and soil carbon.'</p> <p>Currently, calculations by the PalmGHG Calculator do not include soil carbon, organic matter, and soil carbon.</p>
311	Indicator 7.6.3	<p>Request to remove 'since 2014.'</p> <p>This requirement should not be applied retroactively.</p> <p>Request to remove 'soil carbon, organic matter, and soil carbon.'</p> <p>Currently, calculations by the PalmGHG Calculator do not include soil carbon, organic matter, and soil carbon.</p>
312	Indicator 7.6.3	<p>Request to remove 'since 2014.'</p> <p>This requirement should not be applied retroactively.</p> <p>Request to remove 'soil carbon, organic matter, and soil carbon.'</p> <p>Currently, calculations by the PalmGHG Calculator do not include soil carbon, organic matter, and soil carbon.</p>
313	Indicator 7.6.3	<p>Request to remove 'since 2014.'</p> <p>This requirement should not be applied retroactively.</p> <p>Request to remove 'soil carbon, organic matter, and soil carbon.'</p> <p>Currently, calculations by the PalmGHG Calculator do not include soil carbon, organic matter, and soil carbon.</p>
314	Indicator 7.6.3	<p>Request to remove 'since 2014.'</p> <p>This requirement should not be applied retroactively.</p> <p>Request to remove 'soil carbon, organic matter, and soil carbon.'</p> <p>Currently, calculations by the PalmGHG Calculator do not include soil carbon, organic matter, and soil carbon.</p>

No	Criteria/Indicator	Comment (English)
315	Indicator 7.6.3	<p>Indicator 7.6.3.</p> <p>Request to remove "since 2014". The requirement should not be retroactive.</p> <p>Request to remove "below-ground, organic material, and soil carbon." Currently, the calculation by PalmGHG Calculator doesn't cover below-ground, organic material, and soil carbon.</p>
316	Indicator 7.6.3	<p>Request to remove 'since 2014.'</p> <p>This requirement should not be applied retroactively.</p> <p>Request to remove 'soil carbon, organic matter, and soil carbon.'</p> <p>Currently, calculations by the PalmGHG Calculator do not include soil carbon, organic matter, and soil carbon.</p>
317	Indicator 7.6.3	<p>Request to remove 'since 2014.'</p> <p>This requirement should not be applied retroactively.</p> <p>Request to remove 'soil carbon, organic matter, and soil carbon.'</p> <p>Currently, calculations by the PalmGHG Calculator do not include soil carbon, organic matter, and soil carbon.</p>
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320	Indicator 7.6.3	<p>7.6.3 = Request to remove "since 2014". The requirement should not be retroactive. Request to remove "below-ground, organic material, and soil carbon." Currently, the calculation by PalmGHG Calculator doesn't cover below-ground, organic material, and soil carbon.</p>

No	Criteria/Indicator	Comment (English)
321	Indicator 7.6.3	Request to remove 'since 2014.' This requirement should not be applied retroactively. Request to remove 'soil carbon, organic matter, and soil carbon.' Currently, calculations by the PalmGHG Calculator do not include soil carbon, organic matter, and soil carbon.
322	Indicator 7.6.3	Request to remove "since 2014". The requirement should not be retroactive. Request to remove "below-ground, organic material, and soil carbon." Currently, the calculation by PalmGHG Calculator doesn't cover below-ground, organic material, and soil carbon.
323	Indicator 7.6.3	Indicator 7.6.3 Request to remove "since 2014". The requirement should not be retroactive. Request to remove "below-ground, organic material, and soil carbon." Currently, the calculation by PalmGHG Calculator doesn't cover below-ground, organic material, and soil carbon.
324	Indicator 7.6.4	(unsure of the applicability) The criteria state on GHG however, 7.6.4 include non-GHG reduction plan. Generally, before having reduction, identification is the first step.
325	Indicator 7.6.4	Redundant just convert use EF suitable - this is double work
326	Indicator 7.6.4	To reword "relevant stakeholder" to "adjacent stakeholder" due to narrow scope
327	Indicator 7.6.4	Suggest describing whether the "UoC's air pollutants inventory" referred to the enclosed area or surrounding area.
328	Indicator 7.6.4	The part where 'engagement with relevant stakeholders' is not properly emphasised, causing a risk to the intent of this indicator. This indicator is to be reworded to provide clarity. Feedback Type: Text/Wordsmithing
329	Indicator 7.6.4	7.6.4 other significant pollutants reduction plan would need further guidance to comply to the requirement
330	Indicator 7.6.6	"Fire" to "burning"
331	Indicator 7.6.6	Mistake in numbering 7.6.6 -7.6.7.
332	Criteria 7.7	Threshold to decide Natural forest criteria considering it has characteris close to primary forest. From which aspect do we consider a deforestation
333	Criteria 7.7	Size should be taken to consideration to define 'Forest' (as a threshold)
334	Criteria 7.7	Suggest to only maintain HCV, HCS forest for simplicity and to avoid confusion. Put value to the currently existing procedures HCV-HCSA / NPP, where outcome of these procedures have taken forest areas into account

No	Criteria/Indicator	Comment (English)
335	Criteria 7.7	<p>"shall not cause" is unclear without any definition of what activities are considered as "causing". It is probably better to use specific wordings (shall not deforest, damage, degrade) directly.</p> <p>Another possibility is to rephrase and use positive sentence, for example the UoC shall ensure/demonstrate the maintenance and/or enhancement of HCVs, protection of HCS Forests, and respect IP/LC Community Land Use Areas</p> <p>Feedback type:Text/Wordsmithing</p>
336	Criteria 7.7	<p>The date for zero deforestation should remain 2018</p> <p>The methodology that growers are *required* to use for deciding which areas have HCV, are HCS or forest needs to be detailed and not left to choice among a menu of barely relevant options.</p> <p>This methodology must include provisions for consultation with other rightsholders and land users in the UoC, and refer to FPIC standards (as revised not as in current draft)</p> <p>Solution: This matter needs to be referred to an expert group for redrafting.</p>
337	Criteria 7.7	Please check reference to HCVs, HCVs refer to values not areas. Please used correct reference.
338	Criteria 7.7	<p>Requirements for monitoring and management of HCVs appear to have been removed, This is a critical requirement of the 2018 P&C and should not be removed. The 2018 P&C requirements here should all remain in Criterion 7.7.</p> <p>Feedback type: Limitation/Justification</p> <p>Note: Major concern - weakening of the P&C</p>
339	Criteria 7.7	My only inputs are re 7.7.1 and 7.7.2 which I understand you addressed in July. Reading the current draft it seems to me it does not offer growers a clear methodology they should use for identifying forest areas that must not be cleared and so has become unauditable. 2ndly the lack of a required method means that consideration of the views of other land users in the land scape is no longer mandatory. If I am right, then these are VERY serious omissions. Hope you can take this into account.
340	Indicator 7.7.1	Propose to remove Natural Forest as its definition is confusing and it has already covered in HCV HCS. More clarity on definition of Natural Forest
341	Indicator 7.7.1	How the difference of cut off date HCV area and HCS forest on 15 Nov 2018 and November 2024 respectively make confusing auditor/auditee. Propose cut off date back to 2018
342	Indicator 7.7.1	To change definition of deforestation in 2018 if it back to 2018
343	Indicator 7.7.1	What the meant to enhance quality of HCV area in this indicator? (SW)
344	Indicator 7.7.1	The use of natural forest in the indicator would be more restrictive towards clearing for planting. HCV-HCS and LUCA have been including forest for conservation areas to avoid for planting. What is the preimeter used to determine natural forest and land use?
345	Indicator 7.7.1	Does the definition of forest whether primary or natural take into account the land title? Growers have take into consideration the reputational issues.

No	Criteria/Indicator	Comment (English)
346	Indicator 7.7.1	Concern about the new key word used in this indicator- natural forest. The standards review process in the past has no issue on the requirement. The recent addition of the requirement may cause new issues to arised.
347	Indicator 7.7.1	The competence of the assessor is also in question; is there a guarantee that the assessor understands the definition of deforestation?
348	Indicator 7.7.1	"Natural Forest" is proposed to be removed because it was not included during the process in the TF.
349	Indicator 7.7.1	Concern about the new key word used in this indicator- natural forest. The standards review process in the past has no issue on the requirement. The recent addition of the requirement may cause new issues to arised.
350	Indicator 7.7.1	Certain areas can regenerate fast into natural forests and thereby be excluded for oil palm growing. When that happens, it could lead to negative economic impacts to growers especially smallholders. Example - in a region in Colombia where crop failed due to disease and the smallholders has no money to replant quickly, when new vegetations appears, smallholders in the area could no longer plant leading to double whammy for those smallholders. But it is possible for Colomba govt to issue special permit to allow planting but with mgmt plan.
351	Indicator 7.7.1	Regarding HCV-HCS, how do we get expert to decide on thsi (who decides) for natural forests characteristic?
352	Indicator 7.7.1	The inclusion of natural forest which includes regenerated forest will be impractical as the rate of growth of trees, bushes etc. in our tropical climate climate is very fast, but does not mean it has biodiversity ... etc.
353	Indicator 7.7.1	Regarding the addition of natural forest, if this is to try to align wit EUDR, we are still not addressing the gap between the cut-off dates. So, is there a significance in adding in here?
354	Indicator 7.7.1	Including definition of natural forest is good, but the intent to align on EUDR will not be met due to the date
355	Indicator 7.7.1	too many cut off dates: 'confusing'
356	Indicator 7.7.1	To revert back to draft 3, proposed to change to "New Land Clearing" and to reference the National Interpretation for Pirmary forest, HFCC, or grey areas from HCV-HCS. There was other concerns on the impact for forest definitions for NPP.
357	Indicator 7.7.1	Suggested to remove Natural Forest and refer to P&C 2018, 2013, 2008. As the inclusion of Natural Forest which includes regenerated (second growth) forests will be impractical as the rate of growth of trees, bushes, etc., in our tropical climate is very fast but does not mean that it has the biodiversity and supporting ecosystem that is found in a "forest".
358	Indicator 7.7.1	We recommend removing primary forest here (especially as a new definition, not referring to AFi definition) as primary forest is already included within natural forest and natural ecosystems – see AFi definition of Natural forest Feedback type:Implementability/Auditability
359	Indicator 7.7.1	While in the next rows we provide suggestions to “tweak” the current text in the P&C Draft (as requested), we provide here a recommendation for a more substantial revision of the indicators for the entire 7.7 We recommend revising the indicators following this structure: 7.7.1 The UoC shall identify HCVs, natural forest and HCS Forest. Land clearing is considered as high-risk through credible and independently verified LUCA and HCV-HCS assessments Feedback type:Implementability/Auditability

No	Criteria/Indicator	Comment (English)
360	Indicator 7.7.1	<p>New phrasing practically repeats the criterion, only adding cut-off dates. The 2018 indicator has been downgraded to compliance requirement (and without assurance)</p> <p>For consistency, the indicator must refer to the UoC.</p> <p>This first indicator (looking at compliance requirements) is focused on identification of historical land use and current presence of natural, primary, HCS forest, and HCV areas, so the writing should reflect this instead of repeating the criterion 7.7:</p> <p>Suggested text: The UoC has identified natural forest and any area required to protect/enhance High Conservation Values (HCV) areas and High Carbon Stock (HCS) forests. The following cut-off dates shall apply:</p> <ul style="list-style-type: none"> - Since November 2005: primary forest, HCV area, - Since 15 November 2018: primary forest, HCV area, HCS forest, - Since November 2024: natural forest, HCV area, HCS forest <p>Feedback type:Other (Please Specify) - Lowering the level of requirement? Also relevant to implementability, auditability and wordsmithing</p>

No	Criteria/Indicator	Comment (English)
361	Indicator 7.7.1	<p>Scope is missing critical content: HCV areas and HCS forests. It may be best if the definition of "natural forest" is included in "Terms and definitions" (not here)</p> <p>Implementation: Specify that LUCA will be used to identify presence and changes to any "natural forests" (as described in the definitions).</p> <p>If the indicator is revised as suggested above, remove from here reference to "any new land clearing as that is the purpose of 7.7.2.</p> <p>The compliance requirement for HCV identification does not include a requirement to undergo independent quality assurance, something that is explicitly required for the LUCA in this same compliance requirement. We strongly recommend this is added back and retained in the revised draft.</p> <p>Implementation The UoC has identified existing natural forest and any past deforestation or degradation of it (as of cut off dates) through an independently assessed and RSPO approved LUCA. The UoC has identified HCV areas and HCS forests through an independently verified Integrated High Conservation Value and High Carbon Stock (HCV-HCS) Assessment.</p> <p>Feedback type:Other (Please Specify) - Lowering the level of requirement by removing previous requirement for assurance (embedded in the previous requirements to use the HCV-HCSA Manual, and supported in 2018 P&C Annex 5 and its explicit reference to assurance requirements in different scenarios (later expanded in the interpretation document).</p>
362	Indicator 7.7.1	<p>This implementation guidance is insufficient when it comes to identification of natural forests and high carbon stock forest.</p> <p>If HCV identification "shall" be done using the HCV approach this is not informative guidance but a requirement. Same for the reference to a risk-based approach. But then, where is the guidance on what is this "risk based approach"? Who decides "when is necessary"?</p> <p>Feedback type: Implementability/Auditability</p>
363	Indicator 7.7.1	<p>1. Defining natural forest to include regenerating forest (second growth) would be impractical because the growth rates of trees, shrubs, and others in Indonesia's tropical climate are very fast, but this does not necessarily mean they possess the biodiversity and supporting ecosystems that can be classified as 'forest.'</p> <p>2. It is recommended to remove Natural Forest and refer to P&C 2018.</p>
364	Indicator 7.7.1	<p>The definition of forest sometimes does not align with the national interpretation. For example, if the certification unit area is designated as APL (non-forest area) according to RTRW (Spatial Planning), it does not fall within forest area classification.</p>

No	Criteria/Indicator	Comment (English)
365	Indicator 7.7.1	An explanation of the procedure for determining Natural Forest or Primary Forest is needed. Essentially, in the assessments of LUCA and HCV/HCS, what is meant by Forest A has also been identified.
366	Indicator 7.7.1	Within the scope of natural forests, the following are contemplated: regeneration forests (second growth). In this case, it is useful to define conditions or specifications, for example: areas with less than 7 years of regeneration.
367	Indicator 7.7.1	It is necessary to update the LUCA guide and formats, as well as to establish formats for the calculation of compensations.
368	Indicator 7.7.1	Does it not require the HCSA toolkit Will it be applied to HCVN?? will there be a prospect for growers not to use them? using ALS license assessor Make it clear that a 12-month review period does not mean that members can use that period to open peat and forest areas Don't replace a system without replacing it with another?. took HCVN over a decade to develop. it gives a solid standing for growers what happens to ALS assessor.
369	Indicator 7.7.1	suggesting added new planting. no clear indicator for peatland (may not relevant to 7.7.1)
370	Indicator 7.7.1	misrepresents scopes of HCV. appreciate if it can revised. changes and implementation to HCV language Just to clarify since the previous graphic misrepresents scopes of HCV: HCV areas cover primary forest, secondary, partially degraded forest & also natural grasslands and wetlands which contain HCVs (social or environmental). We would appreciate this is revised
371	Indicator 7.7.1	maintain HCVN and use credited ppl to do this. if you put in guidance, it would not be good. Agree to not move forward without HCVN. He believes if the HCVN was put into the informative, this would destroy the credibility. But he agree to remove HCSA. Suggested to have RSPO should have their own definition of HCS. He mentioned putting this at public consultation.
372	Indicator 7.7.1	HVCN ALS took a decade to develop, gives a solid standing of the criticism faced for conservation and LUC. HS: Put in the informative guidance. The system would be implemented after 12 months (grace period).
373	Indicator 7.7.1	(1)Alignment of the Annex 5 with HCV - HCS
374	Indicator 7.7.1	(2)Proposal to established a specific due diligence depending on the situation concerning the clearance by major factors (violence, illegal crops, etc) and to be able to work the new recovered area.

No	Criteria/Indicator	Comment (English)
375	Indicator 7.7.1	<p>Definition by FAO not accepted by MPOA The term "regenerative forest" not acceptable to MPOA Natural forest not acceptable by MPOA Proposed for RSPO to develop own definition of forests</p>
376	Indicator 7.7.1	<p>What tool will the RSPO recognize for identifying 'natural forests'? The Common Guidance for the Identification of HCV does not specifically include a process for identifying 'natural forests'. Meanwhile, the HCSA approach classifies HCS forests as natural forests.</p>
377	Indicator 7.7.1	<p>The cut off date with inclusion of natural forest may indirectly indicated that RSPO never take into the consideration of the natural forest in the certification? Need to clearly define what is natural forest under RSPO and suggest to address the concern or inclusion of natural forest under the 'terms & definition/glossary' instead of in the indicator as intergrated HCV-HCS assesement does protect natural forest in the process, but not clearly stated and presented.</p>
378	Indicator 7.7.1	<p>We support the addition of "natural forests" to this indicator.</p> <p>That said, with respect to the cut-off date, alignment with EUDR would be ideal. If it's not feasible to align completely, we suggest 2020, but with inclusion of corrective action plans / compensation activities for UoCs which have had deforestation of natural-but-not-primary forests between 2020 and 2024.</p>
379	Indicator 7.7.1	<p>A clearer guidance (in addition to the definition) should be given to UoC on how to identify natural forests</p>
380	Indicator 7.7.1	<p>Overall, likely to create significant extra admin/burden for growers to have 3 definitions of forest to consider (natural forest, HCV and HCS). Understandable that RSPO want to get closer to EUDR FAO definition however in practice it is questionable how much value adding "natural forest" will have when already have HCV and HCS. Also HCV and HCS are more than forest definitions they are tools to look at the viability of forest and natural ecosystems, and more importantly tools/good practice on managing and monitoring which must be retained. Suggest having an EUDR "add on" standard with natural forest (similar to EU RED), keeping main standard on HCV and HCS. Or clarity on or commit to guidance clarifying how natural forests should be interpreted (minimum expectations for Nis to build on).</p> <p>We suggest to have an add on for EUDR compliance where necessary.</p>

No	Criteria/Indicator	Comment (English)
381	Indicator 7.7.1	<p>The proposed text is not acceptable. The HCSA has proposed text edits as shown.</p> <p><i>“7.7.1 Land clearing shall not damage primary or natural forest, including primary and HCS forests, and/or any area required to protect/enhance High Conservation Values (HCV) areas and High Carbon Stock (HCS) forests.”</i></p> <p>We have a significant concern that a new cut-off date of Nov 2024 is proposed for deforestation of natural forest.</p> <p>It is not clear why the RSPO says primary or natural forests as primary forests are covered within the definition of natural forests. Definitions need to be added/revised as per the inputs outlined below. The FAO definition of natural forest is not practically applicable in the humid tropics and we do not recommend its use by the RSPO. HCSA methodology and definitions were based on the FAO definition of natural forest but with an approach added to make it practically applicable.</p> <p>Suggest this rewording for the following reasons: -Primary forest is natural forest, so ‘or’ is not correct. -HCS forests are natural forests -‘areas’ is repetitive: already says ‘area required to protect . . . HCVs’</p>
382	Indicator 7.7.1	<p>The proposed text is not acceptable. The HCSA has proposed text edits as shown in red text and strikethroughs.</p> <p><i>“Natural HCS forests area shall be identified through a risk-based approach using a combination of geospatial analysis of remote sensing data satellite imagery and ground verification where necessary. In tropical moist forest biomes, except for ISH, the HCSA Toolkit shall be used to identify natural forest as part of an integrated HCS-HCV assessment. For Indonesian ISH the HCS-HCV Simplified Toolkit Approach for Smallholders may be used. https://highcarbonstock.org/toolkit/”</i></p> <p>Additional views:</p> <ul style="list-style-type: none"> • A risk-based approach is not sufficient evidence of compliance with a no-deforestation requirement. Need a field assessment and verification. • Secondly, a significant concern that a new cut-off date of Nov 2024 is proposed for deforestation of natural forest.

No	Criteria/Indicator	Comment (English)
383	Indicator 7.7.1	<p>"Practicality and implementation of the 'Natural Forest' definition:</p> <ol style="list-style-type: none"> 1) processes to be further detailed out 2) HCV-HCS data should be used to demonstrate compliance to 'Natural Forest'. 3) credibility risk - Independent assurance process is currently missing." <p>Additional Feedback:</p> <p>Feedback Type: Political/External Party</p> <p>"ES (ZSL): our comment is below but I think this is essentially what we agreed at BHCVWG too? If so can more detail be added?: We discussed the addition of 'natural forest' here at length in the BHCVWG. In summary:</p> <ol style="list-style-type: none"> 1) the justification given is that 'natural forest' aligns with EUDR definitions, but the EUDR uses the FAO definition of forests: ""forest' means land spanning more than 0,5 hectares with trees higher than 5 metres and a canopy cover of more than 10 %, or trees able to reach those thresholds in situ, excluding land that is predominantly under agricultural or urban land use;"". AFi uses this definition of 'forest' as well, and 'natural forests' would fall within that, but the P&C does not make any reference to how natural forest is defined, so it is not clear if the intention is for the P&C to now cover the FAO/AFi definition as above. This is a major point to clarify. 2) Linked to this, 'natural forest' needs to be defined before we can decide whether it should be included in the P&C. We understand this is another case where the Secretariat does not want to refer to a third party, but this is necessary in order to have a clear and standardised set of requirements - see other comments on this. We suggest using the AFi definition if including natural forests - but as above, this would presumably meaning using the FAO definition of forests and if so this would need to made very clear. 3) It needs to be made clear what companies are expected to do differently as a result of incorporating 'natural forest' in the P&C. Current 'zero deforestation' approaches taken by companies under RSPO certification are focused around HCV and HCS identification. It therefore needs clarifying what definition is being used for 'natural forest', and how companies are expected to protect it. If the definition of natural forest is considered covered already through the HCS Approach, then 'natural forest' and 2024 cut-off date should not be added here, as it would imply a change in scope where there is none. If using AFi definitions of 'natural forest', and therefore aligning with FAO definition used by EUDR, then a lot more development is needed for this indicator, to clarify how companies should identify and protect such forest, beyond protecting HCV and HCS areas. " <p>Feedback Type: Procedural</p> <p>ES (ZSL): key point is that much more clarity is needed on 'natural forest' defintion and expectations before we can make a decision on how to proceed</p> <p>Feedback Type: Implementability/Auditability</p> <p>ES (ZSL): point 2 here - suggest change to "data collected during HCV-HCS assessments could potentially be used to assess compliance to no deforestation of 'natural forest', depending on what definition of 'natural forest' is used".</p>

No	Criteria/Indicator	Comment (English)
384	Indicator 7.7.1	<p>Feedback Type: Procedural, Text/Wordsmithing, Technical, Implementability/Auditability</p> <p>Criterion/indicator-level wordings are to be resturctured to: 1) reduce repetition 2) provide explicit info for compliance (indicator-level) 3) retain criterion-level wordings (from D3) to demonstrate intended outcome and indicator-level ones to outline compliance steps to identify 'forests'.</p>
385	Indicator 7.7.1	<p>The introduction of the new cut-off date may potentially cause interpretetion risks. It suggests that RSPO members have not been complying to EUDR for the last 4 years.</p> <p>Additional Feedback:</p> <p>Feedback Type: Implementability/Auditability</p> <p>ES (ZSL): I think also we agreed that the cut-off date is only needed if we are introducing something new. If it is decided that 'natural forest' is covered in HCS definition then no need for addition of 'natural forest' and new cut-off date. Should remain same as 2018 P&C if suggestion is that everything currently being done under 2018 P&C should keep being done and is already compliant with 'natural forest' definition to be used. Please add this detail</p> <p>Feedback Type: Technical N/A</p>
386	Indicator 7.7.1	<p>LUCA to be added back into the indicator to be clear on requirements.</p> <p>Feedback Type: Procedural</p>
387	Indicator 7.7.1	<p>There is a need to strengthen RSPO's stance on deforestation. More discussions to be conducted to compare if AFi's definition that is currently used should suffice for the long run and the idea of defining RSPO's own definition to fit the operational reality of the certification.</p> <p>Feedback Type: Technical</p>
388	Indicator 7.7.1	<p>There is a need to update the visual representation of forest definition to state that HCV-HCS assessment covers all the forest categories (that are currently being used in the presentation).</p> <p>Additional Feedback: To clarify - this is not part of the standard right? Was a comment on the presentation during the meeting</p> <p>Feedback Type: Technical</p>

No	Criteria/Indicator	Comment (English)
389	Indicator 7.7.1	<p>HFCC/HFCL - No objection towards this proposal. However, there is a concern regarding leaving interpretation at national level as this would put HCV-HCS at risk. Same generic requirements should apply across the board (non-HFCCs).</p> <p>Feedback Type: Procedural</p>
390	Indicator 7.7.1	<p>Risk-based approach for HCV-HCS to be considered as a strategy to optimise implementation, compliance and data management.</p> <p>Feedback Type: Procedural</p>
391	Indicator 7.7.1	<p>There is a concern about the neutrality of the language that it might cause a credibility. The Integrated HCV-HCSA Assessment is suggested to be reintroduced.</p> <p>Feedback Type: Procedural</p> <p>Additional Feedback:</p> <p>"https://www.hcvnetwork.org/library/hcv-hcsa-assessment-manual-english-2023</p> <p>ES (ZSL): I think we need a stronger message here from the BHCVWG to reflect what was agreed. It is essential that references to HCVN and HCSA methodologies are reinstated within the indicators themselves here (not in guidance), otherwise this is a severe weakening of the RSPO 2018 P&C and would undermine the work already done by Growers to comply with these methodologies. This is a key piece of feedback from the group"</p>
392	Indicator 7.7.1	<p>Please specify clearly about the qualifications of the HCV-HCS assessor. Do they need to be an assessor approved by HCVN?</p>
393	Indicator 7.7.1	<p>- It is proposed that Annex 5 of the P&C RSPO 2018 remain included as guidance in completing the RaCP for Unit of Certification that are still in process.</p> <p>- It is proposed to revert to Indicator 7.9.1 from Draft 3 or P&C RSPO 2018, as it is clear that there is no need to add the term "Natural Forest." It is sufficient to include "primary forest," "HCV," and "HCS," so that the indicator reads: "Land clearing since November 2005 must not damage primary forest or any areas necessary to protect or enhance HCV. Land clearing since November 15, 2018 must not damage HCV or SKT. A historical Land Use Change Analysis (LUCA) must be conducted before opening new land, in accordance with the RSPO LUCA guidance document."</p>
394	Indicator 7.7.1	<p>using 'natural forests' would make more sense, however if the cut-off date is 2024 it effectively renders it useless for EUDR compliance. So it seems the 2nd option is better, IF they can develop the right tools to close the gap in definitions. Ideally they would do both at the same time, so transition to a forest definition which is more aligned with the FAO/legislations, while having a way to close the gap between the cut-off dates in the system (with maybe a 3rd temporary category that is EUDR compliant?)...</p> <p>Natural forest and the FAO definition is also aligned with RSB standards which is helpful.</p>

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395	Indicator 7.7.1	<p>- It is proposed that Annex 5 of the P&C RSPO 2018 remain included as guidance in completing the RaCP for Unit of Certification that are still in process.</p> <p>- It is proposed to revert to Indicator 7.9.1 from Draft 3 or P&C RSPO 2018, as it is clear that there is no need to add the term "Natural Forest." It is sufficient to include "primary forest," "HCV," and "HCS," so that the indicator reads: "Land clearing since November 2005 must not damage primary forest or any areas necessary to protect or enhance HCV. Land clearing since November 15, 2018 must not damage HCV or SKT. A historical Land Use Change Analysis (LUCA) must be conducted before opening new land, in accordance with the RSPO LUCA guidance document."</p>
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402	Indicator 7.7.1	<p>Indicator 7.7.1.</p> <p>Request to remove Natural Forest and refer to P&C 2018, 2013, and 2008. Natural Forest has been covered by Primary forest, HCV area, HCS forest.</p>
403	Indicator 7.7.1	<p>- It is proposed that Annex 5 of the P&C RSPO 2018 remain included as guidance in completing the RaCP for Unit of Certification that are still in process.</p> <p>- It is proposed to revert to Indicator 7.9.1 from Draft 3 or P&C RSPO 2018, as it is clear that there is no need to add the term "Natural Forest." It is sufficient to include "primary forest," "HCV," and "HCS," so that the indicator reads: "Land clearing since November 2005 must not damage primary forest or any areas necessary to protect or enhance HCV. Land clearing since November 15, 2018 must not damage HCV or SKT. A historical Land Use Change Analysis (LUCA) must be conducted before opening new land, in accordance with the RSPO LUCA guidance document."</p>

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409	Indicator 7.7.1	<p>- It is proposed that Annex 5 of the P&C RSPO 2018 remain included as guidance in completing the RaCP for Unit of Certification that are still in process.</p> <p>- It is proposed to revert to Indicator 7.9.1 from Draft 3 or P&C RSPO 2018, as it is clear that there is no need to add the term "Natural Forest." It is sufficient to include "primary forest," "HCV," and "HCS," so that the indicator reads: "Land clearing since November 2005 must not damage primary forest or any areas necessary to protect or enhance HCV. Land clearing since November 15, 2018 must not damage HCV or SKT. A historical Land Use Change Analysis (LUCA) must be conducted before opening new land, in accordance with the RSPO LUCA guidance document."</p>
410	Indicator 7.7.1	<p>- It is proposed that Annex 5 of the P&C RSPO 2018 remain included as guidance in completing the RaCP for Unit of Certification that are still in process.</p> <p>- It is proposed to revert to Indicator 7.9.1 from Draft 3 or P&C RSPO 2018, as it is clear that there is no need to add the term "Natural Forest." It is sufficient to include "primary forest," "HCV," and "HCS," so that the indicator reads: "Land clearing since November 2005 must not damage primary forest or any areas necessary to protect or enhance HCV. Land clearing since November 15, 2018 must not damage HCV or SKT. A historical Land Use Change Analysis (LUCA) must be conducted before opening new land, in accordance with the RSPO LUCA guidance document."</p>
411	Indicator 7.7.1	<p>1. It is proposed that Annex 5 of the P&C RSPO 2018 remain included as guidance in completing the RaCP for Unit of Certification that are still in process.</p> <p>2. It is proposed to revert to Indicator 7.9.1 from Draft 3 or P&C RSPO 2018, as it is clear that there is no need to add the term "Natural Forest." It is sufficient to include "primary forest," "HCV," and "HCS," so that the indicator reads: "Land clearing since November 2005 must not damage primary forest or any areas necessary to protect or enhance HCV. Land clearing since November 15, 2018 must not damage HCV or SKT. A historical Land Use Change Analysis (LUCA) must be conducted before opening new land, in accordance with the RSPO LUCA guidance document."</p>
412	Indicator 7.7.1	<p>7.7.1 = Request to remove Natural Forest and refer to P&C 2018, 2013, and 2008. Natural Forest has been covered by Primary Forest, HCV area, HCS forest.</p>

No	Criteria/Indicator	Comment (English)
413	Indicator 7.7.1	<p>7.7.1</p> <p>- It is proposed that Annex 5 of the P&C RSPO 2018 remain included as guidance in completing the RaCP for Unit of Certification that are still in process.</p> <p>- It is proposed to revert to Indicator 7.9.1 from Draft 3 or P&C RSPO 2018, as it is clear that there is no need to add the term "Natural Forest." It is sufficient to include "primary forest," "HCV," and "HCS," so that the indicator reads: "Land clearing since November 2005 must not damage primary forest or any areas necessary to protect or enhance HCV. Land clearing since November 15, 2018 must not damage HCV or SKT. A historical Land Use Change Analysis (LUCA) must be conducted before opening new land, in accordance with the RSPO LUCA guidance document."</p>
414	Indicator 7.7.1	<p>Request to remove Natural Forest and refer to P&C 2018, 2013, and 2008. Natural Forest has been covered by Primary forest, HCV area, HCS forest.</p>
415	Indicator 7.7.1	<p>Indicator 7.7.1</p> <p>Request to remove Natural Forest and refer to P&C 2018, 2013, and 2008. Natural Forest has been covered by Primary forest, HCV area, HCS forest.</p>
416	Indicator 7.7.1	<p>This is a critical indicator that needs improving. We are very concerned about the removal of reference to the HCVN and HCSA methodologies here for identifying HCVs and HCS. See general comments from us above on this - it is not acceptable for the standard to remove reference to these specific methodologies here. Doing so would leave the approach to critical issues - protecting environmental and social HCVs, and protecting HCS forest - open to interpretation, resulting in 1) unverified and less robust methodologies being used, leading to weaker protection for these critical areas, and 2) lack of a standard approach and therefore of any clear definition for what RSPO certification actually means in the context of protecting forests and HCVs. This would seriously weaken the value of the standard, and we would be unlikely to be able to accept this as an ENGO. We understand there are practical complications regarding agreements that need to be signed, but the solution is NOT to remove these methodologies from the requirements. Putting them in guidance is not sufficient, as it stops them being a requirement. The priority should be to create agreements as needed and to reinstate the requirements of the 2018 P&C regarding use of the HCVN and HCSA methodologies.</p> <p>Feedback type: Implementability/Auditability</p> <p>Note: Major concern - weakening of the P&C</p>

No	Criteria/Indicator	Comment (English)
417	Indicator 7.7.1	<p>We discussed the addition of 'natural forest' here at length in the BHCVWG. In summary:</p> <p>1) the justification given is that 'natural forest' aligns with EUDR definitions, but the EUDR uses the FAO definition of forests: "'forest' means land spanning more than 0,5 hectares with trees higher than 5 metres and a canopy cover of more than 10 %, or trees able to reach those thresholds in situ, excluding land that is predominantly under agricultural or urban land use;". AFi uses this definition of 'forest' as well, and 'natural forests' would fall within that, but the P&C does not make any reference to how natural forest is defined, so it is not clear if the intention is for the P&C to now cover the FAO/AFi definition as above. This is a major point to clarify.</p> <p>2) Linked to this, 'natural forest' needs to be defined before we can decide whether it should be included in the P&C. We understand this is another case where the Secretariat does not want to refer to a third party, but this is necessary in order to have a clear and standardised set of requirements - see other comments on this. We suggest using the AFi definition if including natural forests - but as above, this would presumably meaning using the FAO definition of forests and if so this would need to made very clear.</p> <p>3) It needs to be made clear what companies are expected to do differently as a result of incorporating 'natural forest' in the P&C. Current 'zero deforestation' approaches taken by companies under RSPO certification are focused around HCV and HCS identification. It therefore needs clarifying what definition is being used for 'natural forest', and how companies are expected to protect it. If the definition of natural forest is considered covered already through the HCS Approach, then 'natural forest' and 2024 cut-off date should not be added here, as it would imply a change in scope where there is none. If using AFi definitions of 'natural forest', and therefore aligning with FAO definition used by EUDR, then a lot more development is needed for this indicator, to clarify how companies should identify and protect such forest, beyond protecting HCV and HCS areas.</p> <p>Feedback type: Implementability/Auditability</p> <p>Note: Major concern - unclear requirements</p>
418	Indicator 7.7.2	<p>In comparison to the 2018 Standard, the important element for HCV M&M (Monitoring and Management) is missing. The requirement for HCV IMP (integrated management plan) is not mentioned in this new indicator.</p> <p>This indicator was classified as a Major indicator in the previous version. Why has it been reclassified as a Minor indicator in the 2024 revision?</p> <p>Feedback type: Technical</p>
419	Indicator 7.7.2	There is a big mistake here: the lous is managing the conservation value not the area
420	Indicator 7.7.2	To remove the "enhanced" and "other conservation areas"
421	Indicator 7.7.2	<p>While in the next rows we provide suggestions to "tweak" the current text in the P&C Draft (as requested), we provide here a recommendation for a more substantial revision of the indicators for the entire 7.7</p> <p>We recommend revising the indicators following this structure:</p> <p>7.7.2The UoC shall protect natural forests/HCS forest and other natural ecosystems, maintain/enhance HCVs</p>

No	Criteria/Indicator	Comment (English)
422	Indicator 7.7.2	Indicator missing key scope: "natural forest" (added in this new P&C) Feedback type: Text/Wordsmithing
423	Indicator 7.7.2	Compliance Requirements for 7.2.2 are not provided here at all. There is a reference to Indicator 7.9.2 which does not exist, so the compliance requirements for protecting and enhancing HCVs, etc are not provided anywhere. In other words, the IMP required in 3.3 will not include any measures to protect and enhance HCVs, HCS forest, etc. It is unclear why KBA and protected areas are mentioned here: these are two of the many elements considered in assessment of environmental HCVs. Furthermore, this indicator is not about assessments but about implementation of measures to protect and enhance. The last comment is also out of place as it refers to assessments and it is unclear how is implementable by the UoC. Feedback type: Implementability/Auditability
424	Indicator 7.7.2	Informative guidance reference: It is unclear what is the relevance of this references for "protecting and enhancing" HCVs. If there is a mandatory reference it should be the integrated HCV-HCS assessment report, which states what values are found and what measures are recommended for their protection and monitoring. Note assessments already use as key references those listed here (and others relevant nationally or regionally), so neither the UoC nor the auditors should be expected to go back to these sources. The only reason to include them as references would be for changes in HCVs (some become RTE, and hence merit HCV designation, etc) Feedback type: Implementability/Auditability
425	Indicator 7.7.2	Biodiversity and biodiversity corridors should be mentioned. Enhancing biodiversity is critical to establish resilient plantations, even more so in future.
426	Indicator 7.7.2	How about change of HCV-HCS area due to change of priority by local communities or other unavoidable reasons? How can this be addressed?
427	Indicator 7.7.2	Criticality label (C) is missing. Improvement in language to be more coherent. Feedback Type: Text/Wordsmithing, Procedural
428	Indicator 7.7.2	In comparison to the 2018 Standard, the important element for HCV M&M (Monitoring and Management) is missing. The requirement for HCV IMP (integrated management plan) is not mentioned in this new indicator. This indicator also was classified as a Major indicator in the previous version. Why has it been reclassified as a Minor indicator in the 2024 revision?

No	Criteria/Indicator	Comment (English)
429	Indicator 7.7.2	<p>While in the next rows we provide suggestions to “tweak” the current text in the P&C Draft (as requested), we provide here a recommendation for a more substantial revision of the indicators for the entire 7.7</p> <p>We recommend revising the indicators following this structure:</p> <p>7.7.2 The UoC shall develop and implement a management plan to maintain/enhance HCVs including in planted/developed areas, natural forests/HCS forest and other non-forest natural ecosystems</p> <p>Feedback type: Implementability/Auditability</p>
430	Indicator 7.7.2	<p>The 'C' is missing here to show this is a critical indicator</p> <p>Feedback type: Implementability/Auditability</p>
431	Indicator 7.7.3	<p>To restructure the indicator, the proposed indicator is interpreted with assumption that there is a liability, the wording needs to show if you don't have liability you don't need to do RaCP.</p>
432	Indicator 7.7.3	<p>While in the next rows we provide suggestions to “tweak” the current text in the P&C Draft (as requested), we provide here a recommendation for a more substantial revision of the indicators for the entire 7.7</p> <p>We recommend revising the indicators following this structure:</p> <p>7.7.3The UoC shall conduct monitoring on HCVs, natural forest/HCS Forest , other natural ecosystems to enable adaptive management</p>
433	Indicator 7.7.3	<p>How does this link into social dimensions as well? What are the circumstances under which someone cannot get RSPO certified?</p> <p>Indicator</p> <p>This needs to be revised to reflect the new scope of the standard: add reference to " natural forests":</p> <p>"...where there has been land clearing without prior HCV assessment since November 2005 or without prior HCV-HCS assessment since November 15, 2018, or without LUCA identifying natural forests since November 2024"</p> <p>The procedural note introduces a change in the scope of the indicator, which currently refers only to remediation when there was no previous identification. I think this is not a good change.</p> <p>If the issue of changes in HCVs needs to be addressed (including accidental and limited clearing after assessment, but also other scenarios as discussed in BHCV WG and CTF) this should be a separate indicator (this was asked for in the recent BHCVWG meeting)</p> <p>Very important to consider: The accidental clearance of HCVs is defined in the R&CP, and if you will quote it here, you must include in definitions the full text of the R&CP about what constitutes "accidental clearing", which - among other elements - looks at the entire supply base of the member - not just at a single UoC).</p> <p>Feedback type: Procedural</p>
434	Indicator 7.7.3	<p>should be updated in line w added wording in 7.7.1. (reference to natural forest)</p>

No	Criteria/Indicator	Comment (English)
435	Indicator 7.7.3	<p>The proposed text is not acceptable because the RSPO should not certify units of certification where deforestation has occurred after its cut-off date of November 2018.</p> <p>The RSPO should maintain a No Deforestation cut-off date of November 2018 as per the current standard. The only exemptions or legacy cases were clarified in Annex 5 for the RSPO Principles and Criteria 2018 (Version 12 June 2019)'. The RaCP should be limited to use for compensation of HCV's since November 2005.</p> <p>The RSPO should undertake a review of the RaCP to identify how it can be improved to align with the HCSA Restoration and Remediation Guidance or refer to the HCSA Restoration and Remediation Guidance https://highcarbonstock.org/wp-content/uploads/2023/01/HCSA-Restoration-Remediation-Guidance_V1-1.pdf. https://pagespeed.ce.JYt9CNGBzr.pdf</p> <p>Some HCSA members have a position of no compensation for deforestation after Nov 2018 where companies have deliberately and knowingly cleared forest.</p> <p>Recovery can be used for deforestation between 2016 (industry cut-off) and 2020 (EUDR cut-off).</p>
436	Indicator 7.7.3	<p>IMP and M&M requirements are missing.</p> <p>Feedback Type: Procedural</p>
437	Indicator 7.7.3	<p>There is a need for an indicator that details out the mechanism to document the status changes of HCVs.</p> <p>Feedback Type: Technical</p>
438	Indicator 7.7.3	<p>Accidental/limited clearance' components to be detailed out in RaCP v2.</p> <p>Feedback Type: Procedural</p>
439	Indicator 7.7.3	<p>While in the next rows we provide suggestions to “tweak” the current text in the P&C Draft (as requested), we provide here a recommendation for a more substantial revision of the indicators for the entire 7.7</p> <p>We recommend revising the indicators following this structure:</p> <p>7.7.3 The UoC shall conduct monitoring of HCVs including in planted/developed areas, natural forest/HCS Forest and other non-forest natural ecosystems to enable adaptive management</p> <p>The suggested 7.7.3 (above) is not intended to replace 7.7.3 as included in current draft (regarding RaCP).</p> <p>Feedback type: Implementability/Auditability</p>
440	Indicator 7.7.3	<p>Not clear on the rationale for including the procedural note on exceptional cases for the RaCP here - these are by definition exceptional cases and only treated as case-by-case, so should not be in the body of the indicator</p> <p>Feedback type: Implementability/Auditability</p>
441	Indicator 7.7.4	<p>FPIC is only for new planting / development purposes.To replace the word "FPIC" to avoid confusion.</p>

No	Criteria/Indicator	Comment (English)
442	Indicator 7.7.4	To remove "other conservation areas" and to propose to reword to show that the intent of the consent of the parties is just to do the assessment and not the entire FPIC.
443	Indicator 7.7.4	While in the next rows we provide suggestions to "tweak" the current text in the P&C Draft (as requested), we provide here a recommendation for a more substantial revision of the indicators for the entire 7.7 We recommend revising the indicators following this structure: 7.7.4The UoC shall demonstrate that management measures are effective to protect natural forest/HCS forest , other natural ecosystems and maintain/enhance HCVs.
444	Indicator 7.7.4	Suggest to: - Mention explicitly who is responsible for this: "...evidence shall be available that those rights are respected and protected by the UoC and their contractors Feedback type: Implementability/Auditability
445	Indicator 7.7.4	Compliance Requirements. Suggest using the definition of Indigenous peoples and local communities by AFI. The wording about non-applicability of the collective rights of indigenous peoples (third paragraph) seems an interpretation that may not be supported by international law Feedback type: Limitation/Justification
446	Indicator 7.7.4	we dont hv issue past 10 years for HCV. bathwater this may effect credibility RSPO. new RSPO approved methodology might can be considered. lets have a proper wording. Improved carbon stock methology, instead of adding new requirement. refer to previous guidelines
447	Indicator 7.7.4	the indicator should be upgraded to C Critical
448	Indicator 7.7.4	The concept of FPIC should only be applicable for new development/planting. Therefore, unless this requirement is intended only in those scenario, the word "FPIC" here should be replaced with another suitable word such as "community/stakeholder engagement" to better reflect the applicable situation and scenario.
449	Indicator 7.7.4	Proposed to replace the term "FPIC" at indicator level to avoid misinterpretation and confusion. (note : no proposal of new term to be used)
450	Indicator 7.7.4	The concept of FPIC should only be applicable for new development/planting. Therefore, unless this requirement is intended only in those scenario, the word "FPIC" here should be replaced with another suitable word such as "community/stakeholder engagement" to better reflect the applicable situation and scenario.

No	Criteria/Indicator	Comment (English)
451	Indicator 7.7.4	<p>The standard should reference the following HCSA Social Requirements and Implementation guidance:</p> <p>https://highcarbonstock.org/wp-content/uploads/2023/01/HCSA-Social-Requirements-2020.pdf.pagespeed.ce.VbNlymOVRs.pdf</p> <p>https://highcarbonstock.org/wp-content/uploads/2023/01/HCSA-Implementation-Guide-2020-1.pdf.pagespeed.ce.v1Ew0yp_ba.pdf</p> <p>The RSPO should encourage members to utilize the various training tools developed by the HCSA:</p> <p>https://highcarbonstock.org/indigenous-community-rights/social-requirements-guides-training/</p> <p>The RSPO should refer to the High Carbon Stock Approach Interim Guidance on Integrated Conservation and Land Use Plans as guidance for negotiated agreements with rightsholders on integrated management plans https://highcarbonstock.org/wp-content/uploads/2023/01/HCSA-ICLUP-Interim-Guidance.pdf.pagespeed.ce.JNmVNVmCVa.pdf</p>
452	Indicator 7.7.4	7.7.4 The concept of FPIC should only be applicable for new development/planting. Therefore, unless this requirement is intended only in those scenario, the word "FPIC" here should be replaced with another suitable word such as "community/stakeholder engagement" to better reflect the applicable situation and scenario.
453	Indicator 7.7.4	The concept of FPIC should only be applicable for new development/planting. Therefore, unless this requirement is intended only in those scenario, the word "FPIC" here should be replaced with another suitable word such as "community/stakeholder engagement" to better reflect the applicable situation and scenario.
454	Indicator 7.7.4	<p>While in the next rows we provide suggestions to “tweak” the current text in the P&C Draft (as requested), we provide here a recommendation for a more substantial revision of the indicators for the entire 7.7</p> <p>We recommend revising the indicators following this structure:</p> <p>7.7.4 (C) The UoC shall demonstrate that management measures are effective to maintain/enhance HCVs including in planted/developed areas, natural forest/HCS forest and other non-forest natural ecosystems.</p> <p>Feedback type: Implementability/Auditability</p>
455	Indicator 7.7.5	What the meant to enhance RTE species in this indicator? (SW). How to enhance it?

No	Criteria/Indicator	Comment (English)
456	Indicator 7.7.5	<p>In comparison to the 2018 standard, 2 important elements are missing in the 2024 version for this indicator.</p> <ol style="list-style-type: none"> 1. A mandatory program for educating the workforce about the status of RTE species in place. 2. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. <p>The new revision of the P&C should establish a more robust and credible standard, ensuring it is stronger than the previous version.</p> <p>Feedback type: Technical</p>
457	Indicator 7.7.5	No enhance RTE
458	Indicator 7.7.5	To relook 'enhanced'
459	Indicator 7.7.5	Remove "enhanced". Why / what is the intention of enhancing
460	Indicator 7.7.5	To remove the indicator, found to be redundant as this would be identified in the HCV-HCS period (credibility risk for HCV-HCS assessment)
461	Indicator 7.7.5	<p>While in the next rows we provide suggestions to “tweak” the current text in the P&C Draft (as requested), we provide here a recommendation for a more substantial revision of the indicators for the entire 7.7</p> <p>We recommend revising the indicators following this structure:</p> <p>7.7.5Where IPLC Land/Resource Use Areas are identified within the UoC, the UoC shall demonstrate that the rights of the affected communities are respected in full in accordance to UNDRIP (add also FPIC clause here)</p>

No	Criteria/Indicator	Comment (English)
462	Indicator 7.7.5	<p>This was also included in 2018 P&C but deserves discussion because:</p> <ul style="list-style-type: none"> - it may duplicate or weaken the existing requirement to maintain/enhance HCV 1, as its scope is limited only to IUCN-listed threatened species, while the HCV approach – HCV 1 uses a much broader definition. - It is misleading as it suggests the HCV approach does not protect RTE species, even though RTE species is an integral part of HCV1 (and HCV 2, for wide-ranging species), and the HCV approach doesn't only relate to their identification, but also their management and monitoring to maintain/enhance them. <p>It is likely the historical inclusion of this separate indicator refers to HCV assessments conducted before independent verification (ALS, October 2014), where there were issues with quality of assessments (RTE species and several other HCVs not being identified), if that is the case, this should be explicit.</p> <p>After October 2014, it is independently verified that HCV 1 identification has considered presence and significance of RTE species. This is also the case for HCV-HCSA assessments.</p> <p>If the concern is about RTE species that may have not been identified because they were not found at the UoC at the time of the assessment (wrong season, species was not there at the time), but now are using the UoC, maybe because of degradation of neighbouring habitat, maybe because of protected HCV areas creating good conditions, then we are talking about changes in HCVs and this is a matter of implementation and adaptive management, and should have a separate indicator (as this may concern not only RTE-HCV 1 but also HCV 3, HCV 4 and social HCVs)</p> <p>Feedback type: Technical</p>
463	Indicator 7.7.5	<p>This should be part of the IMP for protecting and enhancing HCVs. Identification of RTE species in addition to those identified in an earlier HCV assessment should be the result of monitoring activities, and should be reflected in updating the list of RTE species under HCV1 designation, as well as the mapping and protection of their habitat. If this is going to be included, the question is...why other HCV attributes do not deserve a separate indicator and prescriptive measures for their protection? What about threatened ecosystems? Critical environmental services? Social HCVs?</p> <p>Feedback type: Technical</p>

No	Criteria/Indicator	Comment (English)
464	Indicator 7.7.5	<p>will growers be expected to do different. type of assesment to identify RTE that not been identified thru HCV assessment. habitat proxy already used in HCVA, & validated w biodiversity surveys. What is additional methodology growers will need to identify RTE? this may result in duplication of efforts, instead of focusing changes in HCV documentation</p> <p>7.7.5 reflects old concerns about HCV identification before ALS. And also questions about what happens when new RTEs (not foud at the time of the assessment) are found (such as in audits). This is something that should easily be addressed through management & monitoring, which should include mechanisms to update information on HCVs presence & condition.</p> <p>This indicator is presenting in HCV M&M as seperate indicator, which is repetitive. otherwise, how does grower shows they meet this requirement to identify 'other RTEs'?</p> <p>so will you require specific practices to identify as HCVs? If included as indicator, this will be required, not just encouraged</p> <p>Our view is that you should only include this indicator if there is a requirement associated with it because it will indeed add work for growers. As discussed, I think the issue of RTE not identified as HCVs is part of the already existing indicator related to M&M of HCVs. So, I would remove this indicator related to M&M, so it explicitly refers to how changes in HCVs are documented.</p>
465	Indicator 7.7.5	<p>How to "enhance the species"?. Don't think you can say enhance species, you can enhance the ecosystem and habitat and species population. It should be the quality of the HCV value be enhanced? suggest to improve quality</p> <p>when conducting impact report--> the set aside conservation area is not improving. thus suggested to enhance the quality of the HCV area.</p>
466	Indicator 7.7.5	<p>what happened RTE is not detected during HCVA but found by auditor? should UoC ask HCV assessor to redo the assessment</p>
467	Indicator 7.7.5	<p>The enhance word is too targeted on RTE. how can growers enhance the species?</p> <p>concern on the emphasize RTE species. concern on the grower's effort.</p>
468	Indicator 7.7.5	<p>Suggest removing the words 'enhance' in the indicator as it is beyond the capabilities of the unit of certification. Otherwise, this indicator could be rephrased to remain its intent as follows 'Rare, threatened, and endangered (RTE) species shall be identified, monitored, and protected. The Unit of Certification should identify potential opportunities to enhance the conservation efforts of RTE species wherever possible.</p>
469	Indicator 7.7.5	<p>the indicator should be upgraded to C Critical</p>
470	Indicator 7.7.5	<p>The word "enhanced" should be removed. How do you "enhanced" RTE species?</p>
471	Indicator 7.7.5	<p>The word "enhanced" should be removed. How do you "enhanced" RTE species?</p>
472	Indicator 7.7.5	<p>Rare, threatened, and endangered (RTE) species shall be identified, monitored, protected, and/or enhanced. This shall apply whether or not the RTE species are identified in an HCV or HCV-HCS assessment.</p>

No	Criteria/Indicator	Comment (English)
473	Indicator 7.7.5	There is a discrepancy between the definitions of RTE in P&C and Addendum. The definition of RTE should be referenced directly from HCVN's Common Guidance in the Identification of HCV. Feedback Type: Technical
474	Indicator 7.7.5	This indicator (RTE) should be moved to Indicator 7.7.3(C) Feedback Type: Technical
475	Indicator 7.7.5	Protected and/or enhanced' is problematic; suggested to be taken out entirely or revert to the full 2018 version. Feedback Type: Technical
476	Indicator 7.7.5	In comparison to the 2018 standard, Two important elements are missing in the 2024 version for this indicator. 1. A mandatory program for educating the workforce about the status of RTE species in place. 2. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. The new revision of the P&C should establish a more robust and credible standard, ensuring it is stronger than the previous version. Feedback type: Technical
477	Indicator 7.7.5	7.7.5 how the word 'enhance' suggested to be removed. No relevance for the implementer or growers enhance wildlife or RTE species within their areas
478	Indicator 7.7.5	The word "enhanced" should be removed. How do you "enhanced" RTE species?
479	Criteria 7.8	This is a new Criterion. Conflict human-wildlife is addressed in the HCV and HCV-HCSA assessments when discussing threats to HCVs (both social and environmental). And the section on M&M of HCV/HCS F to ensure their protection and enhancement already includes (when applicable) recommendations on this topic. Human-wildlife conflict is part of HCV management and monitoring, and therefore should be addressed within the same criterion (instead of creating a new separate one). Why this (of so many other threats to HCVs and local communities) is made into a separate indicator? Wouldn't it be best to ensure that Integrated Management Plans always reflect the findings and recommendations of HCV and HCV-HCS assessments? (including those related to human-wildlife conflict)? Feedback type: Limitation/Justification
480	Criteria 7.8	What does "hollistically" mean? We should avoid subjective terms.

No	Criteria/Indicator	Comment (English)
481	Criteria 7.8	<p>7.8.1 & 7.8.2</p> <p>Several points to consider:</p> <p>1) HWC does not only apply to large mammals. Other animal species should be considered to avoid limiting the intent of this indicator.</p> <p>2) The value of the HCV-HCS assessment conducted at the initial stages should not be diminished as the risk of HWC should have been identified during this stage. The focus should be more on the establishment of management plan and SOPs (highlighted in the assessment report) by the UoC to ensure that there is a level of accountability by companies in addressing HWC in the long run. As it stands now, the addition of HWC indicators seems to be redundant.</p> <p>Feedback Type: Technical, Procedural, Implementability/Auditability</p>
482	Criteria 7.8	<p>We welcome a focus on human-wildlife conflict but it is not clear how these indicators would be audited currently. More clarification and detailed input from experts on this topic would help to strengthen it. If we go ahead with the indicator it should not be restricted only to large mammals, should be relevant for all species. Would also need to clarify scope of what meant by 'human-wildlife conflict' - e.g. does poaching get included here? Collection of plants?</p> <p>Feedback type: Implementability/Auditability</p>
483	Indicator 7.8.1	need more clarity on 'large mammals'. suggest to remove
484	Indicator 7.8.1	To remove "large mammals" to allow the indicator to focus on human wild life conflict
485	Indicator 7.8.1	Proposed to remove the term "large mammal" Proposed to reword the indicator. (note : no suggestion of new wording)
486	Indicator 7.8.1	"to to" remove one "to"
487	Indicator 7.8.1	7.8.1 Define "large mammals" and clarify the conflict between humans and wildlife.
488	Indicator 7.8.2	Actions should be implemented to support improvement on HSC cases (i.e reduce instances)
489	Indicator 7.8.2	Suggest RSPO to provide clarity for wording analysed for improvement. Whether the wording can be management plan or any engagement needed for the human wildlife conflict.
490	Indicator 7.8.2	Suggest to reword" analysed for improvement" to "analysed for adaptive management".
491	Indicator 7.8.2	7.8.2 term 'conflict can be improved' suggested to be removed. the conflict could be something prolonged depending on location of the grower. no relevance for implementer to improve a conflict with wildlife because it may be a one time occurrence, or prolonged conflict.
493	Principle 7	<p>criteria/indicator: not indicated</p> <p>Wordings requiring RSPO BMPs to be followed should be re-added, otherwise there would be no clear reference to evaluate UoC whether they conform with the best practices or not</p> <p>Feedback Type: Implementability/Auditability</p>