

No	Criteria/ Indicator	Comment (English)
1	General	The FFB center is hesitant to provide documentation due to concerns about potential taxation by the government
2	General	FFB Traceability: FFB trader hardly to provide geo location of their centre and they only interested to register with government when government offer incentives.
3	General	Definition of "New Planting:Planned or proposed planting on land not previously cultivated with oil palm after the UoC's membership in RSPO"; question: what about the land previously cultivated with paddy or rubber or other crops?
4	General	RACP is very difficult to apply on the ground and now with compensation it would add more burden to independent SH.
5	General	The HCV app should be able to identify surrounding HCV areas even in existing plantations
6	General	There needs to be more clarity on the term 'plot'.
7	General	RSPO Membership Be more specific about membership requirements. The information on the website does not specify all the steps and times it may take.
8	General	<p>Smallholders : An oil palm grower (<b>individual farmer or in the form of a legal entity</b>) with a total accumulative planted area of oil palm that is smaller than or equal to 50 hectares (ha). The definition of a smallholder farmer and threshold of planted area of oil palm may vary by country, to be determined by the relevant National Interpretation of this standard. In the absence of an NI developed for a specific country and formally endorsed by the RSPO Board of Governors, the definition of a smallholder farmer in the generic standard shall prevail.</p> <p>Comments:</p> <p>1. The sentence Legal Entity is not appropriate if included in the definition section, because the existence of a legal entity model in Malaysia is a specialty. And does not reflect all countries. The definition of Farmers here should be general. If there is something special and only occurs in certain countries, then the specialty has been answered in the National Interpretation of each country. Therefore, if there is a different situation in Malaysia regarding the existence of Farmers who are legal entities, it can be redefined in NI.</p> <p>2. If there is concern that there will be Farmers who cannot reach this standard, because of the different models in Malaysia, then actually this (regarding Legal Entity) has been mentioned in 2.1 MS.A which states: "Smallholders can demonstrate legal ownership or native and/or customary rights to use the land or demonstrate that they are in the process of legalization of the right". Therefore, if there is a specialty, it can be continued with NI and also guidance for Malaysia regarding this matter.</p> <p>Conclusion: Does not include specific things that occur in a particular country in the definition that is general in nature. Because the definition in Generic is general and applies to all countries.</p>
9	General	<p>"National interpretation</p> <p>We suggest to make it clear which indicators are subject to national interpretation. RSPO should have detailed guidance if not national interpretation, appreciating the need for flexibility."</p>

No	Criteria/ Indicator	Comment (English)
10	General	<p>"Smallholder plot definition</p> <p>The proposed change in the wording of the smallholder plot definition is welcome- i.e. dropping the use of the word 'ownership' and adopting instead reference to 'land where smallholders have rights'. Ownership is difficult to interpret in many traditional systems of land and natural resource governance."</p>
11	General	<p>"Smallholder exclusion</p> <p>We believe the current direction within the RSPO is risking exclusion of independent smallholders from supply chains."</p>
12	General	<p>"EUDR requirements/reliance on certificates</p> <p>As great majority of RSPO SH volumes are recognised only through the market for credits, not via physically certified supply chains, there are limited opportunities for certified ISHs to sell into EUDR compliant supply chains. This issue needs to be addressed through the Shared Responsibility track. But RSPO also need to consider how the market for credits generated at Eligibility and Milestone A stages under the RISS can be supported. Otherwise the entry barrier for ISHs to RSPO certification will become higher."</p>

No	Criteria/ Indicator	Comment (English)
13	General	<p>"EUDR requirements/add-on module</p> <p>The proposed changes currently do not offer a clear and comprehensive framework for certified ISHs to collect and share with mills the adequate data required under the EUDR. While the EUDR is directly enforced on companies placing products on the EU market or exporting such products out of the EU, it indirectly imposes these requirements on producers, including ISHs. Producers who fail to provide this information and assurance may find their products rejected by companies seeking to comply with the EUDR, potentially losing access to the EU market as it will force producers to only procure supply from their own plantation and compliant sources. Therefore, while producers, including ISHs, are not the ones liable vis-à-vis the EU, they play a crucial role in its implementation and success.</p> <p>As such, we still see some key gaps remaining in the ISH standard to fully cover the scope of the EUDR, namely:</p> <ul style="list-style-type: none"> <li>a. It is unclear whether the geolocation data requirements systematically include the latitude and longitude points of six decimal digits as requested in the EUDR.</li> <li>b. The scope of RSPO's forest and deforestation definitions are not fully aligned with the FAO definitions used in the EUDR. The RSPO ISH Standard currently allows the conversion of scrubland which will not be accepted under the EUDR. We note the addition of Natural Forests to the Deforestation Criterion, however this remains insufficient to ensure that no deforestation has occurred as defined in the EUDR.</li> <li>c. It remains unclear what the cut-off date for remediation will be. If the cut-off date is post- December 2020, any palm produced in plots of land that have remediated deforestation post December 2020 will not be accepted under the EUDR.</li> <li>d. There is currently no specific requirement to comply with all national laws. While ISH are required to comply with specific laws, the scope remains too limited to fully cover the regulatory expectations.</li> </ul> <p>To avoid any undue burden on ISH who either are producing fresh fruit bunches that are highly unlikely to be destined for the EU market (for example, ISH in West Africa and Thailand), we recommend for RSPO to consider bridging those gaps through the creation of an optional add-on EUDR module to the RSPO ISH Standard, rather than making these requirements obligatory for all RSPO ISH Standard users.</p> <p>For more details on this recommendation, we would like to invite the RSPO and relevant governance bodies (including the ISH SC), to refer to the RSPO RISS EUDR study commissioned by the RSPO and conducted by Proforest. We would like to draw particular attention to section 5.1. Recommendations for the RSPO ISH Standard, as well as section 4.1. Implications at the plantation level – gap analysis of the RSPO ISH Standard versus EUDR.</p> <p>Finally we would also like to flag the current RSPO/Proforest collaboration under the ISEAL Innovation EUDR and independent palm oil smallholder inclusion – bridging the gaps in interrupted supply chains. The aim of this work is to explore solutions to bridge the key barriers to ISH access to EU markets due to bottlenecks occurring once the FFB leaves the ISH farm gate (at the intermediary (dealer), mill and downstream levels) . However the effectiveness of these measures will also depend on the availability of suitable evidence of compliance with the core EUDR requirements on legality, no deforestation and access to geolocation information at the production level for them to achieve their full intended outcome, i.e. smallholder inclusion in EU supply chains.</p>

No	Criteria/ Indicator	Comment (English)
14	General	<p>Definitions and Certification System</p> <p>The definition between different types of smallholders are not clear. In Malaysia, some smallholders whose total land are below 50 Ha registered as business entities, such as "Sdn. Bhd." (Sendirian Berhad - a private limited company) or under the category of "Enterprise". They are not eligible for RSPO certification under the RSPO Independent Smallholder Standard (RISS)</p> <p>The RSPO ruling that excludes independent smallholders with a total production area of 50 hectares or less, who are registered as companies (e.g., Sdn Bhd, Enterprise), from being part of the ISH group and certified under the RISS is unfair and not being inclusive. We recommend that smallholders be defined by their land holdings of less than 50 hectares, regardless of whether the registration is under an individual or a business name.</p>
15	General	<p>Regarding definitions and certification sytem</p> <p>The definition between different types of smallholders are not clear. In Malaysia, some smallholders whose total land are below 50 Ha registered as business entities, such as "Sdn. Bhd." (Sendirian Berhad - a private limited company) or under the category of "Enterprise". They are not eligible for RSPO certification under the RSPO Independent Smallholder Standard (RISS) The RSPO ruling that excludes independent smallholders with a total production area of 50 hectares or less, who are registered as companies (e.g., Sdn Bhd, Enterprise), from being part of the ISH group and certified under the RISS is unfair and not being inclusive. We recommend that smallholders be defined by their land holdings of less than 50 hectares, regardless of whether the registration is under an individual or a business name</p>
16	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: <b>Technical, Text/Wordsmithing</b></p>

No	Criteria/Indicator	Comment (English)
1	Criteria 1.1	- Is the training needs analysis (TNA) conducted on an individual basis or otherwise? - Would like RSPO to develop training tools for use.
2	Criteria 1.1	Is the training plan developed based on the training needs? In order to find the training needs, it is the 16 topics. Isn't that already identified? These are just the topics, as training needs include all the details. There's a tool to assess training needs and capacity of their staff, this can be used.  Suggest RSPO to develop their own tool to assess training needs.
3	Criteria 1.1	In ISO 9000, the training needs is individually as well, because each person require different training. Should we comply with the ISO 9000? RSPO didn't want to put it strictly in the standards but the principle should be the same.  Suggest to include this in the ISH standards, since we are already following ISO9000
4	Criteria 1.1	Replaced "farm" with "smallholder plot(s)" throughout the Principle. The terminology PREDIO is recommended as "the total land occupied by the IPP" and PARCELA as "the productive unit occupied by oil palm".
5	Criteria 1.1	In many cases the smallholder who is the owner of the land has leased out the operations of the farm to another smallholder. Hence in order to effectively manage the plots or to implement BMP, both leassor and the leasee have to undertake some efforts (mostly leasee as he/she is looking after farm operations). Hence the term "Principal Actor" (or any other term conveying the required meaning & intention) could be used for better implementability since the leassor may not be even available to participate in trainings or to implement these practices in day to day operations. Therefore using a term like "Principal Actor" will make way for implementability of this principle since the relevant person out of the pair (the duo of leassor-leasee) can enforce and implement relevant indicator at their level.
6	Indicator 1.1 E	1. In every training, there should be a check on the level of understanding 2. Training materials should cover all indicators
7	Indicator 1.1 E	There must be awareness before signing the commitment because during the audit process when smallholders were interviewed they did not know what was signed in the smallholder commitment.
8	Indicator 1.1 MS A	1. Evidence of training can include one of the following: attendance list and/or photos and/or training materials.  Remove the phrase at the point 'And they are given the opportunity to ask questions if anything is unclear,' because as it stands, it seems to imply a gap related to gender equality. There is no need to make it difficult for farmers to produce meeting minutes. It is sufficient that female farmers are involved in the training, and evidence that female farmers participated in the training does not need to include proof of minutes in the form of Q&A."
9	Indicator 1.1 MS A	Training materials should be made into a uniform template (refer to feedback number 5)
10	Indicator 1.1 MS A	IT should be smallholders and their representative. Sometimes Smallholders hire another person to manage the plantation
11	Indicator 1.1 MS A	To add, Smallholder or their representatives.
12	Indicator 1.1 MS A	We have some smallholder that is not resident but give power of attorney to the person working in the farm to sign
13	Indicator 1.1 MS B	French translation - agricultural product replace to palm xx

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14	Indicator 1.1 MS B	It is recommended to omit documentation regarding production at Point B in relation to transportation information because not all farmers have their own transportation vehicles
15	Indicator 1.1 MS B	Referring to ISH addendum, the compliance requirement mentions that smallholders maintain information on transport like vehicle registration number/ number plate. This is infeasible for them to maintain as the smallholders are hugely fragmented and have small landholdings, many a times they use means like bullock carts also to transport their produce to the mill. Hence information on the vehicle should not be required mandatorily.
16	Indicator 1.1 MS B	"The implementation of separate production records for certified and non-certified fruits is contradictory to Principle 1, which concerns the transparency that the producer must demonstrate regarding the land they manage, including the hectares of plantations at the time of declaring all their properties."
17	Criteria 1.2	There is a need to explain the terminology related to BMPs and GAPs because smallholders still do not understand what BMPs and GAPs are and what they need to complete.
18	Criteria 1.2	BMP, there are some government regulations that can be adopted, and there are some things that RSPO is higher (ie stricter requirement). RSPO has to identify which ones to adopt. RSPO needs to define what is higher and socialise it to smallholders. RSPO make a complete guidance on BMP so that there is no misinterpretation.
19	Criteria 1.2	RSPO should make a BMP guidelines that should be used for independent smallholders in consultation with independent smallholders because there are many regulations made by the government but RSPO has a higher level of compliance, for example in government regulations peat can still be replanted but with certain conditions while in RSPO peat cannot be replanted.
20	Criteria 1.2	Particularly BMPs on peat for smallholders need to be reconsidered because it is quite difficult for smallholders and maybe it can be adjusted to the existing regulations in the government.
21	Criteria 1.2	1. In the compliance requirements, it is necessary to clarify the definition of peat in the RSPO version and the government version. 2. RSPO should develop appropriate BMP guidelines for independent smallholders
22	Criteria 1.2	Who would be nominated to trace the effectiveness of the production of the smallholders. (See BULLET 2 in the indicator)
23	Criteria 1.2	on smallholder plot - replaced to 'on their plot' for better clarity
24	Criteria 1.2	In many cases the smallholder who is the owner of the land has leased out the operations of the farm to another smallholder. Hence in order to effectively manage the plots or to implement BMP, both leassor and the leasee have to undertake some efforts (mostly leasee as he/she is looking after farm operations). Hence the term "Principal Actor" (or any other term conveying the required meaning & intention) could be used for better implementability since the leassor may not be even available to participate in trainings or to implement these practices in day to day operations. Therefore using a term like "Principal Actor" will make way for implementability of this principle since the relevant person out of the pair (the duo of leassor-leasee) can enforce and implement relevant indicator at their level.
25	Criteria 1.2	There should be clear and practical guidelines for implementing FPIC for smallholder.
26	Criteria 1.2	We think a definition of BMP should be provided.
27	Indicator 1.2 E	BMPs should be referenced based on national regulations or RSPO Standard (refer to feedback number 3)
28	Indicator 1.2 E	For SH who only owns the plot but not being the one on the ground managing, there shd be an evidence to show they given the authority/right as proxy (power of attorney) so their proxy is the one signing the SH Declaration

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29	Indicator 1.2 MS A	BMP: Smallholders preferred GAP then BMP
30	Indicator 1.2 MS A	Agree on the use of BMP, as GAP is too stringent
31	Indicator 1.2 MS A	<p>1. Suggest to use consistent acronyms either in Bahasa Indonesia or in English  PPT: Praktik Pengelolaan Terbaik  GAP: Good Agricultural Practices  BMP: Best Management Practices</p> <p>GAP and BMP are English acronyms which mean almost the same as PPT.</p> <p>There is no need for these 3 acronyms to be entered into P&amp;C.</p>
32	Indicator 1.2 MS B	I believe that the socialization of the management plan by the Manager is necessary so that the producer can then commit in principle 1.2 to implementing these practices on their farm.
33	All Indicator in MS A	How to ensure that smallholders follow and understand the training required on all indicators in the MS A, because sometimes during audits when smallholders are asked about what training they have attended and how they understand the training they cannot answer and rarely practice it on their farms so it would be better for training, the RSPO must prepare a guidance which consists of a collection of training materials that must be trained to smallholders to comply with the existing standard indicators to make an uniform understanding.

No	Criteria/Indicator	Comment (English)
1	Criteria 2.1	Provide an explanation of the difference in area between the area shown on the Polygon Map and the area shown on the legality letter.
2	Criteria 2.1	Question on the marks on the land: Whether the ISH can do the determination by themselves, is this acceptable for RSPO? There are certain issues with the CB because the marks are made by themselves. They will have the land title deed, but there are so many types of land title deeds. They have certification for land use, instead of a full land title deed.
3	Criteria 2.1	Land concessions in Thailand used to be for a longer period of time, however nowadays there are short-term rentals of the land which last between 3-5 years. The resiging process involved bidding. Since the certificate lasts for 5 years, the CB may not allow certification on short-term land rentals.
4	Criteria 2.1	at stage E and MS B, is it use the land or own the land? By law there needs to have power of attorney, they have the rights to use the land but not own the land.  if i own the land and give permission to group to use the land, can i do that? Do I need to have a relationship with those people? Can be any people but needs to have an authorization letter, depending on the law. If the simple form is recognised by local law, that's okay. Definitions of rights have different categories.
5	Criteria 2.1	Can areas leased by farmers from government agencies or private entities under short-term contracts be included as part of the membership?
6	Criteria 2.1	Rights are legal, social or ethical principles of freedom or entitlement, in accordance with the International Bill of Rights and other international instruments. Customary rights Legal rights: User rights: Demonstrable rights: - A distinction must be made between customary rights and demonstrable rights. rights. In interpreting demonstrable rights, it states that customary rights would be an informal right. customary rights would be an informal right, so the latter should be deleted to avoid confusion and to avoid the latter to avoid confusion and to be able to complement the idea in customary law. (Proposal for amendment).
7	Criteria 2.1	What is the difference between a demonstrable and a customary right?
8	Criteria 2.1	Is FPIC necessary for exisiting plantation?
9	Criteria 2.1	Conflict - For farmers that do not have access to their own land, the farmer requests to pass through the ISH land, but the permission is denied. The farmer will then go to the village head. Is this considered a conflict? There are cases where certified ISH land is adjacent to the road, but another ISH land adjacent to the plot and public road. Try to get permission to get to the certified plot but the permission is denied. If the permission is denied but no official complaints, then it's not an official conflict. But if there's a lot of conflict, there will be official complaints, the ISH needs to handle this.
10	Criteria 2.1	Grammatical error. Should be communities over <b>the</b> land



No	Criteria/Indicator	Comment (English)
11	Indicator 2.1 E	There is an obligation that land plots must match legality, but in practice farmers cannot be absolutely sure that the size is accurate due to constraints from the history of land management. Therefore the RSPO should consider this.
12	Indicator 2.1 E	Field findings, there is a lot of evidence of mapping done physically that is not overlapping but when measured by the government it becomes overlapping so that the CB makes it a finding and asks to eliminate the overlapping status so that it must change the SHM or HGU (for companies) and the process is not easy. So that needs to be considered by RSPO
13	Indicator 2.1 E	The need for clarity on allowance limits for differences between SHP and legal
14	Indicator 2.1 E	To remove the coordinates because it is difficult for planters because it is not mapped where the expansion is.
15	Indicator 2.1 E	<p>What is the evidence needed to show customary rights? Not everyone can get money to get govt documentation. Okomo, went to the traditional leaders to ascertain to see that smallholders has rights . The traditional leaders have to sign. It can be an issue to produce document in Nigeria</p> <p>In Ghana, the land system is a bit different, some of the land is family name. For community land, the chief will sign. If it is a family land it is the head of family that will sign. They do not have the paper, that is the challenge we have. Some do have paper to prove there is use to right the land .</p> <p>Traditional system in a consent, it can be in the form of consent. They can give it to you, but they don't have a map . you might need the state authority that that is the demarcation . Done by land surveyor which is different from the govt.</p> <p>Sierra leones - According to the prima chief, we have divide the land into Chief dom, we have different classification of chief . assistant chief, section chief, and the land is divided to different section. the land is owned by the family members, if they want to use the land, you only have to talk to the head family and there will not be any document. Only when you want to sell it, the family will come and stop you. It is a verbal document. To make the document, they need to go to Paramount chief who is recognized by the govt, for temporary measure , is considered as legal.</p>
16	Indicator 2.1 E	For the rights of the land, if the land is passed down to son/daughter but the land title deeds still belong to the father and there are no clear demarcation of the land. What is the evidence that can be acceptable by RSPO?
17	Indicator 2.1 E	Clarity should be made here. IT seems like they are referring to user rights.
18	Indicator 2.1 E	<p>Issue when it comes to family farm. Very difficult to get documents as to the rights to use the family land. For instance the head of household may have the document, and he is part of the plot, when the family member asks for the land, the household might refuse to give the documents. (Ivory Coast )</p> <p>South of the country, complaint that is the issue with issuing land titles by the government .</p> <p>There are issues to provide documents to prove rights. It is more oral and not written. The land goes from Family to family and usually it goes to the elder, in a way he has the legal ownership to the land, but sometimes the elder will give some plot to the brother, they can't have the legal ownership.</p> <p>Some have leases and have some sort of documents.</p>

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19	Indicator 2.1 E	For customary right, evidence on letters signed by communiy leaders - to allow local customary practices. This also involves family owned land where the ownership between siblings are not formalised but recognised by community or tribe leaders. Any written recognition from the community or village leader is typically recognised by the court in Gabon and Cote'd'voir (This needs fact-checking).
20	Indicator 2.1 E	<p>The use of the term 'Right of Committees' in the criteria will make smallholders experience / cause problems in the surrounding community. The definition of community is the local community, so far smallholders have never had any problems with the community, all palm affairs are going well. If smallholders have to ensure the rights of the community, this can create issues among the community.</p> <p>I agree with the terms Indigenous Rights but not Community Rights</p>
21	Indicator 2.1 E	<p>Regarding coordinates and maps we suggest that you consider what format it will be in and if it will match EUDR.</p> <p>Note that, smallholders cannot give coordinates with EUDR level of precision currently, therefore it is important that is not required for all of them (but rather include this in the add-on module for EUDR - see tab ISH General feedback). If using RSPO geolocation app- that is fine, but that is not EUDR compliant.</p>
22	Indicator 2.1 E	<p>What about Smallholders with no land title but have been using the land for years- inherited land for generations (not part of legislation- but does not mean they don't have rights to that land) i.e.- property or use rights. Should be detailed under NI. Land tenure could be appropriate instead.</p> <p>We suggest include the "Legal Right to Use" of the land. Specify which documentation is expected as evidence at the Eligibility milestone when the documents recognizing the right are in the process of being obtained.</p>
23	Indicator 2.1 MS B	2.1 MSB - In Africa, it can be costly for SH to demarcate and maintain the plots .
24	Indicator 2.1 MS B	<p>proof of land ownership can be a legally valid document. an acknowledgement recognized by Indonesian law. for ownership whose evidence comes from customary institutions can it be recognized.</p> <p>Is STDB a must?</p>
25	Indicator 2.1 MS B	<p>After dropping the term ownership from the definition of smallholder plots, why has the term ownership been reintroduced here? Does this imply a requirement for documentation, even if the issue authority is a customary one? The wording here seems ambiguous and would benefit from a potential for National Interperetation. We request the NI working groups to provide further guidance.</p>
26	Indicator 2.1 MS B	<p>Plots and ownership boundaries could be different in each context, this could be confusing where smallholders have lots of areas of land adjacent to Palm Oil plots. So what boundaries are referred to here- plot or farm? At Proforest farm is better, but this is not the EU minimum requirement.</p> <p>Demarcation has to be done in field- rather than delineation on a map, and this can be expensive and unfeasible. Therefore there is a need to clarify if demarcation is requiring fences. Also, adding in potential to not have to demarcate usage if surrounded by family/same community could be helpful.</p>
27	Indicator 2.1 MS B	The requirements state that farmers should be able to clearly define the boundaries, but there may not be visible boundary markers. Is this acceptable to RSPO?

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28	Indicator 2.1 MS B	Is the word recognition of indigenous people necessary? If it is allowed, there will be many indigenous recognition letters in the region.
29	Criteria 2.2	For existing plots, smallholders shall respect the Rights of communities over land.  WWF Comment: This criteria is ambiguous, and how can it be proven that the community's rights to the land are respected, especially when the land already belongs to the smallholder?
30	Criteria 2.2	Evidence from affected communities, Who do you need evidence from?
31	Criteria 2.2	What is the evidence required for a conflict resolution? Is it only the document that shows that an agreement has been reached?
32	Criteria 2.2	Is the accessibility of public access (right of way) to the land considered a conflict? If it has escalated to the headman.
33	Criteria 2.2	Clearly define "stakeholders" for smallholder to avoid differing interpretations by various groups.
34	Criteria 2.2	Simplify FPIC for farmers: It is proposed that simply obtaining the farmer's opinion and signature is sufficient.
35	Criteria 2.2	2.2. In the case of existing plots, small producers shall respect the communities' land rights. In the case of existing plots, small producers shall respect the communities' land rights and customs. (Proposal for amendment).
36	Criteria 2.2	Is it the group or smallholders responsibility for this criterion? A lot of the responsibility comes from the landholder leasing the land- so perhaps national interpretation could refine who decides who uses what plot and who has control. We suggest considering how to reframe to be flexible on land tenure situations across jurisdictions.  We suggest to add an additional EUDR module adding wording around FPIC.
37	Indicator 2.2 E	2.2.E. For existing plots, small producers declare that they have acquired the small producer plots without contravening Community Land Rights (if any). QUESTION ( CONSULTATION): How is the required DECLARATION evidenced?
38	Indicator 2.2 MS A	There is lack of clarity on what the training should be. This is very technical and difficult without guidance. The training should be provided by STA (Smallholder Training Academy).
39	Indicator 2.2 MS B	The requirement for NI will be said to encourage the improvement of land legality (SHM) can be considered because it arises from the management that cannot be ascertained.
40	Indicator 2.2 MS B	It is too rigid. It should be the general manager that helps to develop the action plan
41	Indicator 2.2 MS B	It can be challenging to get the village chief and do participatory mapping, and get everyone to agree, that is kind of official, in a form of affidavit. They can also sign a contract with the chief or even the mayor. And sometimes they have SH , and say they have 10 ha , and they just trust the word. It is quite common in Ivory Coast in Gabon. It is a more spoken word.

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42	Indicator 2.2 MS B	<p>This clause can be added D) for Planters who already have a Cultivation Registration Certificate (STD-B) and Environmental Management Statement (SPPL) there is no need to identify points (A), Points (B) and Points (C) in this criterion. However, it is enough to sign the ISH declaration.</p> <p>Note: Growers who already have STD-B and SPPL can be assured that their land is in accordance with the provisions and there will be no impact on other cultivation on the plot.</p>
43	Indicator 2.2 MS B	Further, we suggest that you define who are the stakeholders, who are the right holders, and clarify what evidence is needed. We suggest to define in which situations the engagement process is necessary, and when it is, clarify how this process would be verified.
44	Criteria 2.3	Would the smallholders be trained on how to resolve disputes, including the participatory mapping approach? If so, who would be training them?
45	Criteria 2.3	<p>Normally there's no conflict/dispute.</p> <p>Is this included in the Smallholder declaration already? If not, please include.</p>
46	Criteria 2.3	<p>If there is an issue / complaint / problem / complaint, there are things that cannot be resolved by the Group Manager. For example land grant rights, the Group Manager can only inform the farmers of the method / policy / procedure but cannot complete 100% if the police or district office is involved.</p> <p>The group still has a way / process to deal with the problem but not 100% solved.</p>
47	Criteria 2.3	We suggest RSPO provide guidelines for smallholders facing dispute- what system they could use to resolve disputes and declare the dispute is resolved (in line with RSPO).
48	Whole Indicator 2.3	No attachment of land tenure history and conflicts is required as it is inefficient to use a lot of paper for a large number of members while this certification scheme upholds sustainability.
49	Indicator 2.3 E	<p>2.3. E. Smallholders shall declare existing land and resource conflicts, if any, and commit to resolve them.</p> <p>NOTE: They should first be trained to identify and manage the conflict. Conflict resolution should be mediated by a neutral body.</p> <p>* There is a lot of burden on the GROUP MANAGER to develop and strengthen the capacity of the group members. It is known that not all group managers have the necessary skills to adequately perform the activities required in the standard. The RSPO must therefore constantly strengthen the GROUP MANAGERS, incurring the costs involved.</p>
50	Indicator 2.3 MS A	<p>Suggest adding 'should be trained as appropriate'- as then can be more context specific.</p> <p>For MS A, we suggest the original wording of the 2019 Milestone A should be maintained, which can become part of Milestone B, in response to the fact that use right conflicts are not solved only by training the ISH in land conflict management. This indicator should promote reaching a mutually agreed upon conflict resolution between the parties.</p>
51	Indicator 2.3 MS A	Smallholders don't have the competencies to provide engagement between stakeholders

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52	Indicator 2.3 MS A	Before this indicator is implemented, the RSPO should have provided training related to handling this conflict to all Group Managers and including t providing RSPO guidance on handling conflict at the smallholder level for all Group Managers.
53	Indicator 2.3 MS B	Part of the process of managing conflict should be to collaborate with relevant stakeholders, which could include customary and/or statutory authorities responsible for land and natural resources
54	Indicator 2.3 MS B	This indicator should be more precise. It can be a power struggle. Especially on the participatory mapping
55	Indicator 2.3 MS B	this is on the implementation side. Compliance checklist is about developing the participatory mapping . how are they going to implement it
56	Criteria 2.4	The group manager and ISH do not know that they are in protected areas. When submitting LUCA, they do not know if there are HCV and HCS areas.  The satellite is not updated. ISH found out when doing LUCA that the satellite images were not updated. In some areas, the latest update is 5 years ago.
57	Criteria 2.4	In case of disputes between communities and national parks, they usually will remove them. It is prohibited to operate within these areas according to national law. Normally dont include smallholders who can't comply with this.
58	Criteria 2.4	RSPO should provide interpretation guidance in case there is no NI.
59	Criteria 2.4	Indicator 2.4 Eligibility, MS A, MS B  Smallholders shall ensure that their smallholder plots are located outside areas prohibited by national, regional, or local law, or as specified in National Interpretations such as national park, forest, protected area and steep terrain.  WWF Comment: Without assistance, how can smallholders determine the status of their land? Ideally, updated information should be provided to smallholders regarding this matter beforehand. Without it, smallholders' chances of achieving RSPO certification are low.
60	Criteria 2.4	The term national park should be incorporated into National Interpretation instead of the standard to avoid confusion.
61	Criteria 2.4	Move the law requirement to 2.1
62	Criteria 2.4	NI is needed regarding which areas and types in Thailand are permissible to ensure clarity.
63	Criteria 2.4	Some members' areas, which are legally entitled (Title Deed, SPK), were shown as reserved forest areas in the process of submitting information to RSPO (LUCA report). However, the group adheres to the entitlement documents (please check and specify again).
64	Criteria 2.4	This requirement is acceptable, but there needs to be clarity regarding its interpretation within the country.
65	Whole Indicator 2.4	For land plots that have obtained SHM but are in the forest area, what about it? Can it be traced from which one got it first and can it participate in certification?
66	Indicator 2.4 E	Can each country update its conservation maps, national parks, and protected areas to reflect the latest information and make it available for groups to use under RSPO?

No	Criteria/Indicator	Comment (English)
67	Indicator 2.4 E	<p>Allowing plots (with permission/exemption from govt authorities) to be in PAs, seems not acceptable being in RSPO standards. (view from Paula, Olam Gabon)</p> <p>I find that it does not make sense that it is too naive for RSPO to accept an open gate because we know some government in this or other continental that will open the area in a protected area. This is not acceptable. I propose to go back to 2019 .Even if given an exemption area, not entitled to farm in those areas.</p>
68	Indicator 2.4 E	<p>We agree with RSPO. There are people that went in the forest to farm without authorisation. Now the govt decided to monitor it by putting in place a set of strict guidance on the farmers that went into the forest. by the govt (the ministry of forest and water reserve) It might not be aligned but they allow some corps. If you exceed certain limits, they will chase you out.</p>
69	Criteria 2.5	<p>Is FPIC necessary?</p> <p>Scenario 1: If there is a switch from rubber to OP, but it wasn't notified, They were never certified and never a member.</p> <p>Scenario 2: They are already certified and a member, however, they want to certify more plots of land that were previously planted with rubber</p>
70	Criteria 2.5	<p>Usually how the FPIC is conducted is by approaching them individually and so far there's no issues. Suggested to provide a link in the future to the simplified FPIC.</p>
71	Criteria 2.5	<p>What is the definition of new planting. If they plant before joining, it is an existing plantation?</p>
72	Criteria 2.5	<p>Why has the skip disappeared?</p> <p>Has RSPO yet adopted guidance on simplified FPIC for smallholders? If not, this requirement will be wide open to interpretation.</p>
73	Indicator 2.5 MS A	<p>The training standard should clearly state how many times it should be conducted? Is it once a year, or is there a requirement?</p>
74	Indicator 2.5 MS B	<p>In the terms and definitions section, group 2 suggested that the definition of affected communities, especially in the final statement marked in red, be reconsidered because it creates confusion. This is because it contradicts the concept of KBBD itself, which states that planters who do not have land rights are not included in the affected communities, whereas when we talk about indigenous peoples who may have long settled in an area and they only own land with customary recognition.</p>

No	Criteria/Indicator	Comment (English)
1	Principle 3	General point on ISH labour practice: Given that RSPO SH definition encompasses producers with up to 50 ha, this section must refer to a very wider range of situations - from that where a small producer relies on family labour, with occasional casual employment of people within their own community, to absentee plot holders who employ a contractor to undertake all operations on site, to sizable plantations which can only operate with a permanent labour force. It would be more helpful if the standard distinguished between different context and set differing indicators accordingly
2	Criteria 3.1	The migrant workers require permits, in accordance to the law and it is very expensive. The customary practice is that the migrant workers do not need to require permits, as they can just go back, every 10 days. This is a provincial issue and may be accepted by Thai Law.  It is recommended to refer to ASC's standard on how they address this issue. There is a similar indicator for ASC.
3	Criteria 3.1	In cases where migrant workers along the border do not have a passport or work permit, but instead hold an ID card for stateless persons (pink card), can they be considered legal workers? This is because the documentation process is costly and not worthwhile for employers, as employees often change according to their personal preferences, which Thai law does not fully cover. Is it permissible to proceed in this manner?
4	Criteria 3.1	French translation to be in present tense, rather than future
5	Indicator 3.1 E	This indicator should provide several concrete examples and specific standards related to force labour (including ILO, Law UU Ketenagakerjaan no.13 and Cipta kerja 2020). Given that smallholders often lack the necessary expertise to effectively train on this topic, this kind of reference will help the smallholder to enhance their understanding and capacity to address forced labour concerns adequately.
6	Indicator 3.1 E	Most workers are seasonal and do not possess work permits. They are using tourist visas to work. Is this considered acceptable?
7	Indicator 3.1 E	How would the workers under independent party who works at the SH plot is obligated to the same requirements? The SH does not have any authority over the workers under the contractor how the workers are managed.
8	Indicator 3.1 E	Regarding workers hired under contractors. Farmers do not have the right to know more in-depth information such as agreement, pay slip. Here we have a limitation of information that can be given to small farmers. So, growers have limitations to know more information if the work taken is under the supervision of the contractor
9	Indicator 3.1 E	The indicator should only commit to the requirements. The training should not be in the Eligibility phase.
10	Indicator 3.1 E	For ISHs, this requirement will limit the ISH certification if it remains in Eligibility. We suggest it should be passed as Milestone B compliance. Mainly on legal compliance with regulations for hiring workers. This would make the certification process economically unfeasible for small producer groups in LATAM.
11	Indicator 3.1 E	This indicator should provide several concrete examples and specific standards related to force labour (including ILO, Law UU Ketenagakerjaan no.13 and Cipta kerja 2020). Given that smallholders often lack the necessary expertise to effectively train on this topic, this kind of reference will help the smallholder to enhance their understanding and capacity to address forced labour concerns adequately.
12	Indicator 3.1 E	Comment: This should be put at milestone A- Indicator 3.1 E : The small producer can commit to training but not to remove something that is not known to him/her and not to comply with laws that are not known to small producers.

No	Criteria/Indicator	Comment (English)
13	Indicator 3.1 E	The labour agreement should also be in a language that is understood by the labour worker. Would RSPO be supporting the smallholders with such translation work, especially for indigenous language that might not be available on Google Translate, ChatGPT etc?
14	Indicator 3.1 E	IND. 3.1E - Existing statement in the new standard is confusing i.e., legal compliance, commit to complete training? Proposed to reword as follow: Smallholders commit to not using any form of forced labour and to ensure that any use of forced labour on the farm is stop immediately. The smallholders also need to commit in participating all identified trainings related to force labour. The implementation of the relevant training will be in MS-A.
15	Indicator 3.1 MS A	Comment: Indicator 3.1 HA : only from this point should the implementation of the elimination of forced labour start.
16	Indicator 3.1 MS A	Also add periodic training
17	Indicator 3.1 MS B	Implementation point: to be deleted as it is not applicable to the Indonesian context.
18	Criteria 3.2	What indicator is used to determine whether the child's work on the farm is interfering with their education? Eg. Attendance form by the school?
19	Criteria 3.2	CRITERIA 3.2 - Existing statement is also confusing, and did not correlate with the requirement in the indicators. Proposed the following: i) To maintain the criteria statement as in ISH 2019 - which is more straight forward & clear. ii) To provide guidance on "child providing assistance", to avoid the misuse of unpaid family member leading towards child labour.
20	Criteria 3.2	Comment: Criterion 3.2 (Child labour) On many farms the smallholder owners do not live on the farm. The farm manager may have his or her children working on the farm. The standard should be modified to take this reality into account.
21	Indicator 3.2 E	The indicator should only commit to the requirements. The training should not be in the Eligibility phase.
22	Indicator 3.2 E	Comment: Indicator 3.2 E: The small producer can commit to training but not to removing something that is not known to them and not to complying with laws that are not known to small producers. This should be put in milestone A.
23	Indicator 3.2 MS A	Comment: Indicator 3.2 HA: only from this point should the implementation of the elimination of child labour start.
24	Indicator 3.2 MS A	The definition of family members of planters should be expanded to include not only the nuclear family but also family members who live in the same planters' home
25	Indicator 3.2 MS A	The definition of child labour should be expanded to include a minimum and maximum age range (as it is still written as under 18 years old)
26	Indicator 3.2 MS A	What is the case of married child labourers who are under 18 but have to support their families by working?
27	Indicator 3.2 MS A	How to ensure that children's right to education is not restricted? What is the evidence that needs to be verified?
28	Indicator 3.2 MS A	One piece of evidence should be enough, that is : Attendance list and/or training materials
29	Indicator 3.2 MS B	Added PPE according to the type of work



No	Criteria/Indicator	Comment (English)
30	Indicator 3.2 MS B	Scope: Deleted section: For the point that young workers (12-17 years old) who work on the planters' plots (if any) should have their wages paid and a separate pay slip.
31	Indicator 3.2 MS B	Adopted might be difficult to prove to auditor especially when it's not legally adopted. Young worker PPE is if any, but written in French as if available. Suggest to exclude word of excludes in family member definition.
32	Indicator 3.2 MS B	Suggest to exclude sentence of excluded in family member definition. "Family members refer specifically to individuals within the nuclear family structure. This includes parents, siblings and children who are directly related by blood, marriage or adopted. Excluded from this definition are extended family members such as aunts, uncles, grandparents and cousins. The focus is on the immediate family unit, emphasizing the core relationships that typically reside within the same household."
33	Indicator 3.2 MS B	French Translation issue with young workers and PPE (if any). Instead of indicating 'if any' to workers. the translation seems to refer to the PPE instead.
34	Indicator 3.2 MS B	Definition of Family Members . Can this be subject to National interpretation ?
35	Indicator 3.2 MS B	child reference in indicators - confusion on applicability/relevance between within family members, child labour (Sect note: refer to smallholder household definition)
36	Indicator 3.2 MS B	Def Family members : Instead of adoption, we suggest children under our care
37	Criteria 3.3	In General: To provide guidance on how to convert the regional minimum wage rules (as per the prevailing rules) into a unit that can be understood by Smallholders (specifically for NI)
38	Criteria 3.3	Comment: Criterion 3.3 (minimum wage) the implementation of this criterion is complex due to the working conditions in the countryside (informal, temporary, migrant work).
39	Criteria 3.3	Generally, field workers (harvesting, fertilizing, etc.) are not bound by a work agreement (PKS). One plot of land may be worked on by several different individuals, and one worker may work on several different plots. As proof of payment, we can prepare payslips/receipts for each job done. However, the wage standard is usually based on negotiation between both parties.
40	Criteria 3.3	Which minimum wage is referenced? Provincial minimum wage or City minimum wage (Upah minimum provinsi-UMP or Upah minimum kota/kabupaten-UMK) Is this wage calculated monthly or per job?
41	Indicator 3.3 MS A	Payslip may not be possible to be provided in all situation. Propose to replace payment with evidence of payment instead.
42	Indicator 3.3 MS A	Referring to ISH addendum, the compliance requirement of this indicator mentions that smallholders should provide payslips to the workers. Providing payslips is not possible for smallholders and hence not be mandated. Instead some sort of record keeping and sharing information with workers should be allowed as an alternative so as to make it implementable.

No	Criteria/Indicator	Comment (English)
43	Indicator 3.3 MS A	Same comment as the criteria
44	Criteria 3.4	Criterion 3.4 (Right to complain) No comment. Use Whatsapp groups as alternative grievance mechanism)
45	Indicator 3.4 E	What is the form of socialisation to workers regarding the grievance and appeal mechanism?
46	Indicator 3.4 E	For daily or short-term workers, is it necessary to provide benefits since they work on an occasional basis?
47	Indicator 3.4 MS B	Please clarify what the limitations of 'countermeasures' are?
48	Criteria 3.5	Should add the agreement/employment form, normally verbal agreement, but should add a simple contract. Worker household should include a list of workers assistant. List the names of assistants who are the assistant in the household.
49	Criteria 3.5	In terms of contract workers, do they need to provide training to the workers from the collection centre? If they are not fixed workers, do we need to provide welfare? This needs to be more clear.
50	Criteria 3.5	<p>For groups close to the border area, some workers don't have work permit. This is a problem. Some workers cross the border with a temporary work permit. This work permit typically cost 20,000 bht. They have to travel back and forth to renew license (every 7 days). Its a major issue and at the end of the day they dropped the certification application because they could not solve the problem. CBs always raise this issue because they need a passport and work permit.</p> <p>In 2012, among the pioneer groups for RSPO certification, they could not solve the problem. The group set up the team for the harvest, there will be a specific task force. Still have shortage from time to time, cannot be scaled up. If this practice is acceptable, then the numbers of our members can be higher.</p> <p>Sometimes the workers entry from border has the wrong permit (e.g tourism). It can be a grey area. During passing the border, customs dont typically ask what are you doing in thailand. Sometimes worker obtain the wrong permit. Which cause CB to reject the compliance. RSPO needs to clear cut what the conditions for this is This will depend on the NI of the law, and what would be the room for interpretation.</p>
51	Criteria 3.5	Is it okay if SH put a condition that casual workers should have their own PPEs before signing the contract? This has been a practice because it is unsustainable for SH to provide PPE to each casual worker as the casual workers are always changing
52	Criteria 3.5	Hard to provide safe house because like in Gabon law, the requirement is too strict for smallholder to follow.
53	Criteria 3.5	3.5 Add the point that housing is offered to workers but they are free not to live on the workplace, if they do not wish to and have their own means of accommodation
54	Criteria 3.5	3.5 Add the point that housing is offered to workers but they are free not to live on the workplace, if they do not wish to and have their own means of accommodation

No	Criteria/Indicator	Comment (English)
55	Criteria 3.5	RSPO must include or develop guidance on minimum H&S requirements for ISH.
56	Indicator 3.5 E	Do we need to provide training for contract workers? Does the training include laborers from the collection centre? Labor from the collection centre moves around the plot. SH has to train those that come to the SH plot. Even if the workers are contracted, if they come from the collection centre, but since they work in the SH plot, they are responsible for the training.
57	Indicator 3.5 E	Do we need to prepare welfare for only permanent workers? Normally only permanent workers. Because there are very few permanent workers, they are rotating among the plots, some are temporary workers. That's why we have the simplified labour agreement.  Does that mean we have to do contract agreement with casual workers? Verbal agreement is acceptable as long as acceptable under the local law. Simplified agreement signed individually. Sec - definition on Smallholder household and family members
58	Indicator 3.5 E	Safe working conditions and facilities should be referred to national legislation to avoid any different interpretations. Different auditors might have different interpretations if you do not define the scope
59	Indicator 3.5 E	Criteria 3.5 states Working conditions and facilities are safe and meet <b>minimum legal requirements</b> , but the "legal requirement" is not in the 3.5 E indicator, this might open for different interpretations for different auditors.
60	Indicator 3.5 E	Indicator 3.5 HA: The indicator should clarify that the training is for the worker and the small producer's family if any. Training is not for the worker's family.
61	Indicator 3.5 MS A	REMOVE THE EDITORIAL "mark points/locations that may be dangerous/dangerous by installing safety signs as clearly as possible".  Every work area in the garden is an area with a high risk of danger. Enough with identification and location points.  Making signs/signs at each location will be a burden on farmers.
62	Indicator 3.5 MS A	Add a simple agreement form.
63	Indicator 3.5 MS B	Indicator 3.5 HB: The indicator should clarify that safe working conditions are for the worker and the small producer's family if any. Training is not for the worker's family.
64	Indicator 3.5 MS B	Clarify the word 'toilet access' so that interpretation is not biased
65	Indicator 3.5 MS B	Scope: Point B Basic First Aid Equipment, addressed to ICS not to smallholders. Point D (adequate drinking water) and F (access to toilets) add the word 'if needed'
66	Indicator 3.5 MS B	Free PPE is not possible for all types of workers especially casual workers that come on a one-off basis. This will be too costly and unsustainable. This is also because PPEs cannot be taken back and provided to another workers for hygiene purposes.
67	Criteria 3.6	We suggest that RSPO define how family workers are involved in plots. Does this go into guidance for the certificate holder?  How to have a grievance mechanism anonymous for a family member to use and conflict being resolved?

No	Criteria/Indicator	Comment (English)
68	Criteria 3.6	Added the word if needed
69	Indicator 3.6 E	3.6 E Add reference to ensuring equal terms of employment, including equal contractual terms and pay for men and women. As another example, add reference to gender based violence and ensuring it does not occur on plantations.
70	Indicator 3.6 E	3.6 E Add reference to ensuring equal terms of employment, including equal contractual terms and pay for men and women. As another example, add reference to gender based violence and ensuring it does not occur on plantations.
71	Indicator 3.6 MS B	We suggest keeping the indicator MS B of the 2019 standard, supplemented by the updated 2024 indicator info.

No	Criteria/Indicator	Comment (English)
1	P4	We would still prefer to see HCSA and RSPO align on a methodology for smallholder HCS assessments if possible, rather than duplicating efforts to create similar but divergent methodologies. If necessary agreements can be reached with HCSA we would urge reconsidering whether HCSA can be followed here. Concerned that IS-LURI is not sufficient to identify HCS and while it is only intended as an interim, it means certification during that interim period is to a different standard than once a full HCS process is developed and in place. How will this be managed? Will ISH have to get certified again following updated process?
2	Criteria 4.1	Is the RSPO Forest Protection Approach tool available? If not, is it identified by ourselves or how?
3	Criteria 4.1	How to identify HCS and HCV in independent smallholder plantations, will there be tools developed by RSPO related to this?
4	Criteria 4.1	What is IS-LURI? Please explain the guidelines and procedures.
5	Criteria 4.1	The RaCP compensation details must be considered to ensure that smallholder farmers can implement them effectively
6	Criteria 4.1	Please elaborate on the approach for identifying land use risk (IS-LURI).
7	Criteria 4.1	Farmers still do not understand the IS-LURI process.
8	Criteria 4.1	Would like a further explanation of IS-LURI.
9	Criteria 4.1	Will the RaCP process be implemented following the announcement or not?
10	Criteria 4.1	FCL for independent smallholder, if enforced, may not align with actual practices for ISH
11	Criteria 4.1	For HCV-HCS area for ISH plots, using the simplified HCV approach also the assessment IS-LURI to make sure that the land is maintained and improved. Suggest to add simplified so that we can get the coverage.
12	Criteria 4.1	We propose to change smallholder plots to smallholder management units Specify in the guide: plot, farm,
13	Criteria 4.1	- Enunciate " potential areas with high carbon stock risks".
14	Criteria 4.1	LURI is not the methodology for defining HCS
15	Criteria 4.1	What about Simplified HCV Approach - ARC?
16	Criteria 4.1	How do we identify HCS?
17	Criteria 4.1	Change HCV area to HCV value
18	Criteria 4.1	With respect to a particular region in India - the 8 North-Eastern States, around 70-80+ % of their geographical area falls under "Forest Cover" (considering the definition of >10% canopy density and >1 ha land area) irrespective of the Govt. or private ownership. Hence even the smallholder land could be flagged as HCV-HCS area in these states. Although we understand that these must be conserved, but the land is a source of subsistence for the smallholder and they might wish to plant crops on it. The Govt. of India is also focusing on these states under its National Mission by increasing oil palm plantation in these states to improve smallholder livelihood and development. Even in the cases where oil palm is substituting any existing crop, there might be an HCV-HCS zone before (historically). Therefore a balance is required in terms of conservation and plantation allowed in these HCV-HCS areas in the high forest cover regions so that there is win-win for both environment and the smallholder, rather than excluding these smallholders which will result in their marginalisation.

No	Criteria/Indicator	Comment (English)
19	Criteria 4.1	<p>There is no simplified integrated HCV HCS assessment, but keeps being referred to here. HCS takes a week of an engineers time, therefore is unfeasible for a smallholder to do this, but maybe group manger should know. Further, it is not common to find HCS in smallholder land- difficult to understand and train smallholders in this approach. Smallholders to recognise RTE is difficult for a smallholder with a small plot of land.</p> <p>No agreed methodology for ISHs to comply the requirememnt to identify HCS. The simplified HCV approach and IS-LURI does not integrate HCS. With the demise of the HCSA it is difficult to see how and when the HCS-HCV Simplified Smallholder Approach for Indonesia can be promoted or adapted for global use. May be better to drop reference to HCS in this criteria and under criteria 4.3.</p>
20	Criteria 4.1	Identification' of HCV and HCS needs to be added back into requirements - this step now missing from 4.1
21	Criteria 4.1	<p>The indicators within this criterion should be improved to explicitly describe components to be identified and the process to implement it.</p> <p>Feedback Type: <b>Technical, Text/Wordsmithing</b></p>
22	Criteria 4.1	<p>Cut-off dates (Nov. 2005 &amp; 2009) and notes for the interim procedure/approach are missing (i.e., IS-LURI).</p> <p>Feedback Type: <b>Technical</b></p>
23	Criteria 4.1	<p>Identification' component to be included in MS B.</p> <p>Feedback Type: <b>Procedural</b></p>
24	Criteria 4.1	<p>"Natural forest' (or any other forest definition that will be finalised) is to be used here to ensure alignment with P&amp;C.</p> <p>Feedback Type: <b>Text/Wordsmithing</b></p>
25	Criteria 4.1	<p>The usage of 'HCV areas' is not accurate due to the fact that the focus of this criterion is to ensure the protection of values not just the areas.</p> <p>Feedback Type: <b>Technical</b></p>
26	Criteria 4.1	4.1:Add a procedural note to include Guidance on RTE species. in 4.3: Regarding no planting on buffer zones: add a comma followed by according to local legislation.
27	Criteria 4.1	I consider the preparation and incorporation of the IS-LURI or IRUT-PPI to be very good as a tool to identify and give conformity to future new plantings or expansions if any, as well as in the case of replanting in peatlands where an evaluation must be demonstrated of risks.

No	Criteria/Indicator	Comment (English)
28	Criteria 4.1	It is recommended to clarify what is necessary for an SIA to meet the minimum requirements and in fieldwork. A consistent methodology must be used to identify the areas of direct and indirect influence. Expropriated lands: Modifying the term expropriation and clarifying the definition is suggested. It is recommended to re-evaluate the mention of conflict resolution between them. Same comment for the definition of Conflict Resolution System in the glossary. It is recommended to re-evaluate the mention of conflict resolution between them. Same comment for the definition of Conflict Resolution System in the glossary. It is recommended to clarify "benefit". Does it imply that members of the affected communities become partners? This is not viable.
29	Indicator 4.1 E	There is no HCS in the 2018 Thailand NI 2018. In P&C but the note section mentions HCS
30	Indicator 4.1 E	New planting should be previously forest or? What is the definition of new planting? Suggest to have better explanation on the definition of new planting.
31	Indicator 4.1 E	Is there a cut off date/start date for the New Planting?
32	Indicator 4.1 E	In order to do NPP, do we have to do deep dive into subdistrict level? E.g if we want to do new plantings, do we only go to the village head? Or do we check with all the multi-stakeholders around the area? How deep do we go?  Some farmers don't have big plot, if we set up meeting, it may involve smaller groups not everyone.
33	Indicator 4.1 E	When talking about FPIC, if new planting and there's no land dispute, do we have to do public consultation with stakeholders? Can we just do new planting without FPIC?
34	Indicator 4.1 E	Revert to earlier text "Smallholder shall commit protect HCVs and HCS forests, and to manage rare, threatened, or endangered (RTE) species, if present."  Current text mistakenly refers to protecting HCV areas: it is the values that must be protected (and this may include measures also in developed areas).  Feedback type: Technical  Note: Major issue: clarity
35	Indicator 4.1 MS A	Eliminate Point C. Just Point D. Through the RSPO Secretariat, training is held and facilitated for HCV identification  Note: The smallholder should be responsible for looking for experts to carry out training. RSPO should facilitates these activities.
36	Indicator 4.1 MS A	Noted that training on HWC has been removed here due to difficulty of implementing, but not clear that it is due to a lack of need for such training? IF needed then suggest it remains in but more discussion is had around how to support better training. HWC is a key and complex issue so adequate support should be provided
37	Indicator 4.1 MS B	Translation issue
38	Indicator 4.1 MS B	This relevant action plan needs to be made into a simple template to make it easier for the smallholders.

No	Criteria/Indicator	Comment (English)
39	Indicator 4.1 MS B	<p>Concerned to see the reference to 'maintaining' HCVs HCS and RTE species has been removed, and also concerned that this is noted as a 'minor refinement of the indicator'. This is in fact a major change to the requirements here, and in our view unacceptable. We understand from the BHCVWG discussion that the rationale behind this is that as the HCV identification process is simplified, there is not an automatic baseline to measure maintainance of the HCV over time against and therefore it is difficult. This is not an acceptable rationale to us - if this has been identified as a challenge, we should be discussing how to support SHs to implement rather than just lowering the standard. Setting HCVs aside has a lot less value if there is not requirement to protect and maintain them over time. The word 'maintain' must be added back in here.</p> <p>Weakening of the RSPO standard Support the suggestion to refer to 'HCVs' not 'HCV areas'</p>
40	Indicator 4.1 MS B	<p>"Maintain' has been removed from this indicator. This should be reintroduced to ensure no dilution of standard from the previous iteration.</p> <p>Feedback Type: <b>Technical</b></p>
41	Criteria 4.2	As a member of the Working Group discussing the revision of the RaCP document, I would like to ask the independent smallholders here. If there is land that is required to be remediated (returned to its natural state as it was before oil palm was planted) after the completion of 1 planting cycle, how do independent smallholders respond to this, can it be implemented or not?
42	Criteria 4.2	<ol style="list-style-type: none"> <li>1. What is the remediation and compensation scheme for smallholders? The suggestion is that if the scheme does not yet exist, this indicator cannot be implemented for the audit.</li> <li>2. How does the remediation and compensation scheme differ from the company in its implementation? Because the land ownership of smallholders is on average 0.5 - 2 Ha.</li> <li>3. What is the appreciation/incentive for farmers who do the remediation if this can be implemented?</li> </ol>
43	Criteria 4.2	<ol style="list-style-type: none"> <li>1. Shared responsibility for remediation mechanisms</li> <li>2. Provide access to funding as a form of compensation if smallholders voluntarily participate in remediation as a form of responsibility. This funding aims to maintain the continuity of smallholder livelihoods.</li> </ol>
44	Criteria 4.2	There should be a specific mechanism whereby the role of the supply chain is to financially support RaCP operations or sources of financial funds are coordinated and allocated to independent smallholders.
45	Criteria 4.2	Racp implementation on independent farms is difficult to do
46	Criteria 4.2	<p>Regarding RaCP, independent smallholders agree to the implementation of RaCP requirements for independent smallholders, as long as there is space and a mechanism so that independent smallholders are not burdened by this requirement and the hope is that compensation costs can be borne together through a shared responsibility mechanism in the supply chain.</p> <p>We also want that until the above mechanism is available, the RaCP requirement is not a point that will be audited.</p>



No	Criteria/Indicator	Comment (English)
47	Criteria 4.2	In response to Mr. Hendi's question (#8). It is very risky for farmers because farmers cannot choose their land. The selection of land currently owned is not based on the environmental considerations that RSPO currently has. This has the potential to cause internal conflicts between members because of the jealousy of farmers whose land is not in riparian areas etc. which are included in the category required for remediation.
48	Criteria 4.2	It would be inaccurate to start the discussion about the persistence of planting in riparian areas by independent farmers with the construct of "I was wrong and therefore I must apologize by doing environmental remediation". Because, it could be that the beginning of the life of some tribes in Indonesia did start from the edge of the river. Local aspects must also be considered.  I agree more if the emphasis is brought to the discussion of "how do we manage it?"
49	Criteria 4.2	In the case where the LUCA report indicates that the area is peatland, but in reality, it is not, the group did not dispute this error to avoid prolonging the report issuance process (which usually takes about 4 months to receive). With the new standards addressing the RaCP process, this could potentially impact the group since the LUCA report has been inaccurate from the beginning.
50	Criteria 4.2	The RaCP process should be designed in a simplified format due to budget constraints.
51	Criteria 4.2	Please consider focusing on RaCP specifically for Independent Smallholders (ISH). Implementing any RaCP, regardless of the method, will significantly impact larger farmers.
52	Criteria 4.2	Please ensure that the RaCP process suitable with ISH.
53	Criteria 4.2	Please clarify the RaCP process, as there are concerns due to the small size of land held by smallholder farmers. Some have as little as 5 rai or 0.8 hectares.
54	Criteria 4.2	LUCA map for comparison of the land, there's issue because the analysis of the land does not match the reality. The LUCA report generation is late and communication with RSPO takes a lot of time. That becomes problematic.
55	Criteria 4.2	FPIC for new planting in Thai NI, we need clear specification on scope and responsibilities.
56	Criteria 4.2	Audit of the buyers - request for the group to inspect only the first buyer. If the members send, it is not traceable. For the test of the product, it cannot be done on a monthly basis. The land and living conditions are quite limited. Suggest 6 months to be ideal.
57	Criteria 4.2	The new RaCP will be launched soon, it is another commitment for the group. The current practice, LUCA report sent from RSPO when compared with reality is mismatched. It will have ripple effect if the RSPO is enforced it will be difficult for the smallholders to move forward. Need the compensation plan and SIA. For eg we need compensation plan, or EIA. It usually takes 6 months to 1 year for a LUCA report, and the compensation plan is even longer. How long will it take to get certified members? It is an endless task for the smallholders. RSPO needs to be clearer and make RACP more accurate, practical for LUCA to implemented on ISH.
58	Criteria 4.2	LEACH should be replaced with LUCA
59	Criteria 4.2	Who will fund the SH for remediation if the SH don't have money? We discussed this but so far no solution. REmedy costs a lot. if the SH do not have the means to do that, if we go to the plants and we need to supress one plantation, it is not honest. that is why there is no solution from the dicussion
60	Criteria 4.2	Include as a procedural note: that the RapC is not yet defined and will be published soon.

No	Criteria/Indicator	Comment (English)
61	Criteria 4.2	<p>With respect to a particular region in India - the 8 North-Eastern States, around 70-80+ % of their geographical area falls under "Forest Cover" (considering the definition of &gt;10% canopy density and &gt;1 ha land area) irrespective of the Govt. or private ownership. Hence even the smallholder land could be flagged as HCV-HCS area in these states. Although we understand that these must be conserved, but the land is a source of subsistence for the smallholder and they might wish to plant crops on it. The Govt. of India is also focusing on these states under its National Mission by increasing oil palm plantation in these states to improve smallholder livelihood and development. Even in the cases where oil palm is substituting any existing crop, there might be an HCV-HCS zone before (historically). Therefore a balance is required in terms of conservation and plantation allowed in these HCV-HCS areas in the high forest cover regions so that there is win-win for both environment and the smallholder, rather than excluding these smallholders which will result in their marginalisation.</p>
62	Criteria 4.2	<p>If asking with same factors as with companies- then mills will not pay as communities do not have resources or land to do compensation, and unlikely to be able to do remediation. In fact it could actually make it easier for companies to buy land from ISH who are not community members.</p> <p>Need more guidance and info on RaCP procedures- need simplified RaCP process for smallholders</p> <p>RSPO should include the fact that if the RaCP procedure is not developed, the indicator does not apply.</p>
63	Criteria 4.2	<p>If the smallholder's existing land plot was planted and cleared after November 2005 or falls within an area identified as HCS forest after November 2019 until the Eligibility phase, the Remediation and Compensation Procedure (RaCP) will apply as appropriate for smallholders based on LUCA.</p> <p>The process of LUCA analysis takes a very long time.</p>
64	Criteria 4.2	<p>It is recommended to clarify what is necessary for an SIA to meet the minimum requirements and in fieldwork. A consistent methodology must be used to identify the areas of direct and indirect influence.</p> <p>Expropriated lands: Modifying the term expropriation and clarifying the definition is suggested.</p> <p>It is recommended to re-evaluate the mention of conflict resolution between them. Same comment for the definition of Conflict Resolution System in the glossary.</p> <p>It is recommended to re-evaluate the mention of conflict resolution between them. Same comment for the definition of Conflict Resolution System in the glossary.</p> <p>It is recommended to clarify "benefit". Does it imply that members of the affected communities become partners? This is not viable.</p>
65	Indicator 4.2 E	<ol style="list-style-type: none"> <li>1. Wording change from "all SH plot" to "owned SH plot"</li> <li>2. For auditability purposes, proposed to remove 'to Group Manager' after the November 2005</li> </ol>
66	Indicator 4.2 MS A	replace snaitation to remediation
67	Indicator 4.2 MS A	<p>edit text &lt;Smallholder and group manager shall develop a remediation and compensation plan, if any, through a participatory process based on the Remediation and Compensation Procedure (RaCP) process for smallholders.&gt;</p> <p>Feedback type: Technical</p> <p>Note: Major issue: clarity</p>

No	Criteria/Indicator	Comment (English)
68	Indicator 4.2 MS B	Edit text <Smallholder shall implement the approved remediation and compensation plan, if any, based on Remediation and Compensation Procedure (RaCP) process for smallholders, if any.> Feedback type: Technical Note: Major issue: clarity
69	Criteria 4.3	RSPO must conduct training related to FPA
70	Criteria 4.3	There needs to be some sort of BMP for replanting schemes on sloping land
71	Criteria 4.3	What is the definition of the word conversion in this criterion?
72	Criteria 4.3	1. National Interpretation Steep slopes of no more than 40% 2. Best Management Practices (BMP) on slopes are not regulated in 4.3. (only available for new planting)
73	Criteria 4.3	The replanting scheme on sloping land needs to be clarified, can smallholders replant on sloping land?
74	Criteria 4.3	This indicator does not regulate whether replanting on sloping land is allowed or not, so we are confused whether replanting on sloping land is allowed or not. Furthermore, it would be better if RSPO develops BMPs for replanting on sloping land.
75	Criteria 4.3	The management of riparian areas should be clear because smallholder farmers have limited land area, and the same standards as P&C should not be applied.
76	Criteria 4.3	I would like to have a definition of 'riparian reserve areas' specified in the context of Thailand for smallholders, as the P&C definitions may not be suitable for smallholders.
77	Criteria 4.3	If the allocated area has land title, but the steep is higher than 25 degree, can we do new planting there? This can be adjusted in NI, but has to be according to the law in Thailand. This has to revert to NI interpretation for this. SH need clarification in the Thailand context and to consider putting this in NI. If you talk about the industrial estate, the director has the authority to allow work on all types of plots.
78	Criteria 4.3	For riparian area, want to have a clearer definition of the length width land conditions etc. It is not clear on whether or not to refer to Thai law or rspo.
79	Criteria 4.3	Want to get clarification type of waste that can managed by themselves, and type that need specific handling by the government.
80	Criteria 4.3	LURI leaves a gap, what is the next step if you identify risk...you will not be able to plant? E.g. In the case of Peru, the shrubs are LURI. It is recommended: - Simplified HCV - ARC approach should be stated. - Until approved, adapt LURI for these cases.
81	Criteria 4.3	include natural / primary forest. To align with the terms used in P&C

No	Criteria/Indicator	Comment (English)
82	Criteria 4.3	With respect to a particular region in India - the 8 North-Eastern States, around 70-80+ % of their geographical area falls under "Forest Cover" (considering the definition of >10% canopy density and >1 ha land area) irrespective of the Govt. or private ownership. Hence even the smallholder land could be flagged as HCV-HCS area in these states. Although we understand that these must be conserved, but the land is a source of subsistence for the smallholder and they might wish to plant crops on it. The Govt.of India is also focusing on these states under its National Mission by increasing oil palm plantation in these states to improve smallholder livelihood and development. Even in the cases where oil palm is substituting any existing crop, there might be an HCV-HCS zone before (historically). Therefore a balance is required in terms of conservation and plantation allowed in these HCV-HCS areas in the high forest cover regions so that there is win-win for both environment and the smallholder, rather than excluding these smallholders which will result in their marginalisation.
83	Criteria 4.3	Depending on what is decided re definition of forest in the P&C, this needs to be aligned with that definition of forests.
84	Criteria 4.3	in 4.3: Regarding no planting on buffer zones: add a comma followed by according to local legislation.
85	Criteria 4.3	I consider the preparation and incorporation of the IS-LURI or IRUT-PPI to be very good as a tool to identify and give conformity to future new plantings or expansions if any, as well as in the case of replanting in peatlands where an evaluation must be demonstrated of risks.
86	Criteria 4.3	It is recommended to clarify what is necessary for an SIA to meet the minimum requirements and in fieldwork. A consistent methodology must be used to identify the areas of direct and indirect influence. Expropriated lands: Modifying the term expropriation and clarifying the definition is suggested. It is recommended to re-evaluate the mention of conflict resolution between them. Same comment for the definition of Conflict Resolution System in the glossary. It is recommended to re-evaluate the mention of conflict resolution between them. Same comment for the definition of Conflict Resolution System in the glossary. It is recommended to clarify "benefit". Does it imply that members of the affected communities become partners? This is not viable.
87	Criteria 4.3	Use documents such as the Simplified Approach to Land Conservation Value (HCV) and the Independent Smallholder Land Use Risk Identification (IS-LURI), as well as require an integrated management plan for new plantations and increased training for smallholder palm producers.
88	Criteria 4.3	The following needs to be revised (see added in red and deleted with strike-through) Since November 2019, new planting by independent smallholders, if any: <ul style="list-style-type: none"> <li>• Do not replace any HCVs <b>as defined by RSPO Simplified HCV Approach</b></li> <li>• Do not replace any HCS forests as defined by <del>RSPO-Simplified HCV Approach and IS-LURI</del></li> </ul> Feedback type:Implementability/Auditability  Note: Major issue: clarity
89	Indicator 4.3 E	Use documents such as the Simplified Approach to Land Conservation Value (HCV) and the Independent Smallholder Land Use Risk Identification (IS-LURI), as well as require an integrated management plan for new plantations and increased training for smallholder palm producers.

No	Criteria/Indicator	Comment (English)
90	Indicator 4.3 E	<p>Current indicator focused on SH providing information on new clearing, while it should be focused on SH committing to no new clearing/land preparation until the simplified HCV-HCS procedure has been completed, as (logically) it is the procedure that informs them what is HCV/HCS and therefore can or cannot be cleared:</p> <p>Proposed text:            Smallholders shall commit to provide information on all planned new planting <b>and shall commit to no new planting until the simplified procedure to identify HCV and HCS forest is completed.</b></p> <p>Feedback type: Limitation/Justification</p> <p>Note: Major issue: clarity</p>
91	Indicator 4.3 MS A	I consider the preparation and incorporation of the IS-LURI or IRUT-PPI to be very good as a tool to identify and give conformity to future new plantings or expansions if any, as well as in the case of replanting in peatlands where an evaluation must be demonstrated of risks.
92	Indicator 4.3 MS A	<p>For any new planting, before any land preparation commences, smallholder and group manager shall develop through a participatory process <b>an</b> integrated management plan to maintain or enhance HCVs as well as HCS forests <b>after November 2019</b>, as identified by the RSPO Simplified HCV Approach and IS-LURI.</p> <p>Feedback type: Implementability/Auditability</p> <p>Note: Major issue: clarity</p>
93	Indicator 4.3 MS B	Use documents such as the Simplified Approach to Land Conservation Value (HCV) and the Independent Smallholder Land Use Risk Identification (IS-LURI), as well as require an integrated management plan for new plantations and increased training for smallholder palm producers.
94	Criteria 4.4	Suggestion to use the term PPT/BMP for consistent mention in RSPO documents
95	Criteria 4.4	Most of the farmers' areas do not contain peatland.
96	Criteria 4.4	The LUCA report indicates that palm oil is being grown in peat areas, but in reality, this is not the case.
97	Criteria 4.4	The report LUCA interprets the area as peatland, but the actual area is not.
98	Criteria 4.4	In the LUCA report, the area is identified as a peat swamp, but in reality, it is not. What actions can the group take?
99	Criteria 4.4	In the LUCA report, the area is identified as a peat swamp, but in reality, it is not. What actions can the group take?
100	Criteria 4.4	What is the form for assessing water management and flood risk? How much flood-prone area is defined as a flood area?
101	Criteria 4.4	<p>GROUP DISCUSSION</p> <ul style="list-style-type: none"> <li>-Agree, the guidelines apply to the System.</li> <li>-How applicable is it for the small one?</li> <li>-Are the best management practices the same for a 2 ha or 100 ha -management unit (e.g. peat management case)?</li> </ul>

No	Criteria/Indicator	Comment (English)
102	Criteria 4.4	It is recommended to develop Annexes to the Guidelines that provide good practices appropriate to the context of smallholders e.g. for: Peat management, flood management.  But the question remains... AND HOW DO WE PROCEED UNTIL THIS IS DONE?
103	Criteria 4.4	Since requirement for group manager to identify existing peat planting has been removed as seen as redundant, suggest instead that it is specified the existing peat proof will be drawn from the LUCA done by the Secretariat. So that it is clear what source is being used and separate, conflicting inventories are avoided
104	Criteria 4.4	It is recommended to clarify what is necessary for an SIA to meet the minimum requirements and in fieldwork. A consistent methodology must be used to identify the areas of direct and indirect influence. Expropriated lands: Modifying the term expropriation and clarifying the definition is suggested. It is recommended to re-evaluate the mention of conflict resolution between them. Same comment for the definition of Conflict Resolution System in the glossary. It is recommended to re-evaluate the mention of conflict resolution between them. Same comment for the definition of Conflict Resolution System in the glossary. It is recommended to clarify "benefit". Does it imply that members of the affected communities become partners? This is not viable.
105	Criteria 4.4	Use documents such as the Simplified Approach to Land Conservation Value (HCV) and the Independent Smallholder Land Use Risk Identification (IS-LURI), as well as require an integrated management plan for new plantations and increased training for smallholder palm producers.
106	Indicator 4.4 E	The word guided does not make the requirement as normative
107	Indicator 4.4 E	Clarification on the word minimise peat subsidence. To what extent the minimise would do
108	Indicator 4.4 E	Peat subsidence can be minimised but not maintained
109	Indicator 4.4 E	We suggest that RSPO maintain the 2019 wording for Eligibility, as it gives more detail on the GM's responsibility to identify whether ISH plantings are established on peat soils. Include that in case of demonstrating that there is no peat soil, through national or on-site surveys, detail that the following Milestones are not applicable.
110	Indicator 4.4 E	Use documents such as the Simplified Approach to Land Conservation Value (HCV) and the Independent Smallholder Land Use Risk Identification (IS-LURI), as well as require an integrated management plan for new plantations and increased training for smallholder palm producers.
111	Indicator 4.4 MS B	Use documents such as the Simplified Approach to Land Conservation Value (HCV) and the Independent Smallholder Land Use Risk Identification (IS-LURI), as well as require an integrated management plan for new plantations and increased training for smallholder palm producers.
112	Criteria 4.5	Suggests using terminology that is easy for farmers to understand (related to terms such as GAP BMPs).
113	Criteria 4.5	Assessment of peat that is allowed to be replanted should be left to the group manager and does not have to be approved by the RSPO.
114	Criteria 4.5	There are many confusing terms such as BMP, GAP, PPT, please explain and use simple and consistent terms.
115	Criteria 4.5	There is no clarity in the risk assessment of flooding areas.

No	Criteria/Indicator	Comment (English)
116	Criteria 4.5	If replanting is identified as a high-risk factor, and farmers are required to cease such planting, what are the requirements or principles for alternative strategies?
117	Indicator 4.5 MS A	Assessment of flood risk analysis is sufficient for self-assessment by farmers to the group manager.
118	Indicator 4.5 MS B	What is the mechanism for submitting the peat assessment? Suggestion, for approval only up to GM, no need to go to RSPO.
119	Indicator 4.5 MS B	Need to consider the ability of smallholders to apply for approval (mechanism) 1. farmer's ability 2. Easy mechanism
120	Indicator 4.5 MS B	Explain further what needs to be done on the plots identified as high risk.
121	Indicator 4.5 MS B	The SH can look into the adopting alternate strategy
122	Indicator 4.5 MS B	no longer specifies 'prior' risk assessment - why?
123	Criteria 4.6	The using of waste, what kind of waste that include in this regard?
124	Criteria 4.6	1. What are the limitations of the effluents being managed? Does it include domestic (household) waste ex: 5 scattered beverage bottles are also included as waste. 2. The use of fire other than for pest control, such as to grill fish from a fishing ground, will this be an audit finding?
125	Criteria 4.6	Please clarify whether domestic waste if found will be a finding during the audit? Please provide a clear definition for waste (specific to smallholders).
126	Criteria 4.6	1. Specify the definition of "Waste" that should not be burned, as it needs to consider "domestic waste" from planters. 2. Does this include small-scale or household waste burning?
127	Criteria 4.6	Provide a specific explanation of the definition of "waste management" within the farm plot area, and the limitations and scale of impacts are further specified.
128	Criteria 4.6	The definition of effluent needs to be specified. What is meant by waste here? Is domestic waste included in this criteria which is also prohibited to be burned?
129	Criteria 4.6	Emphasize the clear management of waste, such as no open burning. If waste disposal by incineration in enclosed areas is allowed, specific types of waste that can be burned must be clearly defined.
130	Criteria 4.6	Define the term "no open burning for waste management" in terms of types of waste, as local residents or farmers, before becoming members, used to dispose of waste by burning. Even after becoming members, some still continue to burn waste. It is not possible to completely prohibit this practice.
131	Criteria 4.6	Categorizing waste for the purpose of interpreting burning regulations may include exceptions for certain types of waste that can be burned properly.
132	Criteria 4.6	Please provide definitions for types of waste that can be burned, cannot be burned, or are strictly prohibited from burning.
133	Criteria 4.6	Add definitions for types of waste that can be incinerated.
134	Criteria 4.6	Define the term "waste" and specify which types of waste can or cannot be incinerated.
135	Criteria 4.6	Can the use of fire for livestock management in oil palm plantations or for household waste disposal be allowed if the group has a plan and methods in place to manage it?

No	Criteria/Indicator	Comment (English)
136	Criteria 4.6	What types of waste are prohibited from being burned?
137	Criteria 4.6	Please specify clearly which types of waste are prohibited from being burned.
138	Criteria 4.6	Allow the group to have a procedure for requesting permission to burn in certain cases.
139	Criteria 4.6	The guidelines should clearly specify which types of waste can be burned and which cannot, and outline best practices for burning waste.
140	Criteria 4.6	Would you like to expand on the term "no open burning for waste management"? Specifically, which types of waste cannot be burned, and which types can be burned?
141	Criteria 4.6	Please specify clearly which types of waste are prohibited from being burned.
142	Criteria 4.6	Clearly define the term 'waste' and specify the scope of what can and cannot be burned. What are the boundaries or clear meanings for open-air burning?
143	Criteria 4.6	Regarding the use of fire for waste burning, please specify clearly which types of waste are permissible to burn.
144	Criteria 4.6	Need to have clear explanation on what is the scope of burning, e.g allowed burning for certain plots. Get the context in details and definition. What is the scope and what can be done? Fire was used to kill pests, need to get clarification.
145	Criteria 4.6	<p>Is it possible to burn one palm tree with disease? If we get the approval, we need to request it from the sub-district level. Consider that the GM can evaluate and make decisions.</p> <p>Propose to send the request to the district level agricultural office, can the GM make the decision? The approval should come from state authorities, not RSPO. Can it be a village head, make it more realistic or practical, or the relevant authorities work on agriculture.</p> <p>The term relevant authorities is not clear. Needs to provide clarification on who are these authorities in the thai NI. The approval body is not clear, some say state authorities etc.</p> <p>NI to address which are the relevant authorities in Thailand. We have to train the relevant officers to know about this. In reality, the district level agriculture officers are our stakeholders. This is all about communication. We can consult with stakeholders, should the SH submit the request, GM take the request and consult with the agriculture department. This new version need to adjust the procedures, need to inform the officers too.</p>
146	Criteria 4.6	<p>Do we need to inform agriculture officers if we want to burn one tree because the tree has disease that could escalate to the others. What is the level of acceptance? It's not clear.</p> <p>There's no resolution whether going to burn it or not, who is authorized to make the decision? When we revise the quality, can we manage it within the group?</p>
147	Criteria 4.6	<p>It is recommended that the text of 7.1.8 of P&amp;C2024 be added.</p> <p>"Except in exceptional circumstances" with respect to the management of pests requiring fire.</p>
148	Criteria 4.6	Choose to use the word of "zero burning" instead of "the use of fire/fire burning".



No	Criteria/Indicator	Comment (English)
149	Criteria 4.6	<p>Often ISH will not have access to heavy machinery for land clearance. This is particularly critical when replanting, as without removal of palm stumps there is a risk of build up on Gandoderma fungus, which can seriously curtail the length of subseqnet rotations with implications for production cost and GHG emissions. How will ISHs reduce fungus build up without machinery or use of fire. There is a risk of disciminating against ISH achieving or maintaining certification. Should maintain the option for limited use of fire in specific circumstances, and allow the specifics to be set out in national interpretations.</p> <p>Regarding waste if can't burn- then people will dig and bury it. If they cant bury- then the waste will build up as no other processs to remove waste.</p>
150	Criteria 4.6	Open burning for waste management or other reasons should also not happen in the vicinity of the farm Eg. if the smallholder's house is next to the farm, there should not be open burning too
151	Indicator 4.6 MS A	previously specified no evidence of burning - why removed?
152	Indicator 4.6 MS A	[discrepancy in translation] For individual member, need to seek approval "with" or "from" Group Manager? This contradicts with another guidance at 4.6 MS B.
153	Indicator 4.6 MS B	Which relevant government agencies and at what level are involved?
154	Indicator 4.6 MS B	Can we use fire to control pests? What is the definition of plant disease control? If we want to burn one palm tree with disease, do we need to get approval from authorities or Group Manager? If we burn one palm tree with a lot of insects, can we just burn that one tree? Without approval?
155	Indicator 4.6 MS B	<p>if we use fire to burn the palm frond to eradicate mosquito, can we do that? If we use fire to burn the palm frond to eradicate the mosquitoes, can we do that? Can we get approval from local authorities for that?</p> <p>if palm has disease and its hard to spray and kill. Experts say must burn, can we do that? Can group manager approve this?</p> <p>Suggest to have another layer of control mechanism, related to ICS. Check with all the authorities. Some smallholder groups have agricultural offices, these offices can advise how to control pest. If these offices are govern by authorities can they give the approval?</p>
156	Criteria 4.7	What reference is used for riparian?
157	Criteria 4.7	<p>The streams in question:</p> <ol style="list-style-type: none"> <li>1. What biodiversity is present?</li> <li>2. Or those with social impacts?</li> </ol>
158	Criteria 4.7	Provide a more detailed explanation of how river riparian is determined and what documents should be referred to in determining river riparian. This should be clear to avoid unnecessary arguments with the auditor during the audit.
159	Criteria 4.7	Provide clear definitions for rivers and river zones
160	Criteria 4.7	Please clarify the definition of a river and explain the management method of riparian reserves.
161	Criteria 4.7	What are the criteria for defining a reserved area or Riparian reserves, and which documents or authorities will be used as references?

No	Criteria/Indicator	Comment (English)
162	Criteria 4.7	The previous standard used the term buffer zone but it now changed to reserves. They are both the same thing. This term was changed is to align with the terminologies. The participant agreed that it is easier to understand if term is aligned.
163	Criteria 4.7	add' riparian zone' in French translation
164	Criteria 4.7	We agree Use a single term riparian or riparian.
165	Criteria 4.7	There is a potential misinterpretation risk when it comes to the application of BMPs on ISH's operations. The specific reference of the BMP document should be further detailed out to enhance clarity of the requirements. For example, the different interpretation of 'riparian reserves' in the context of national legislation. Which definition should be considered by auditors and UoC?  Feedback Type: <b>Procedural</b>
166	Criteria 4.7	"River" is missing in this indicator. The suggestion is to include this to strengthen the focal point on the conservation of riparian reserves especially nearby rivers.  Feedback Type: <b>Text/Wordsmithing</b>
167	Indicator 4.7 E	We propose: Riparian reserves (riparian zones) are identified and managed in a way that ensures their maintenance and/or improvement, in accordance with national legislation and the latest version of the RSPO document.
168	Indicator 4.7 E	In addition to the commitments, training should also be mentioned in Eligibility, whether it be riparian buffer zones, use of pesticides and storage and IPM so that they reinforce the commitments.
169	Indicator 4.7 MS B	previously this was a requirement to identify, now is a requirement to commit to identify - will this be audited differently? Seems a reduction in requirement if now will only be audited on whether they have the commitment
170	Criteria 4.8	There needs to be specific guidance from RSPO for the use of pesticides
171	Criteria 4.8	There should be clear guidelines for the authorization of chemical usage, tailored to each country's regulations. For example, Furadan is permitted in Thailand but banned under the Stockholm Convention.  Alternatively, it could be specified that for certain diseases, the recommended chemical treatment should be clearly defined.
172	Criteria 4.8	Specify which chemicals are prohibited for use in Thailand

No	Criteria/Indicator	Comment (English)
173	Criteria 4.8	The term "Make a commitment to stop using and phasing out existing stocks of paraquat and other banned pesticides", is it already in smallholder declaration? If not please include it in smallholder declaration. Its actually in the WHO list, so do we have to announce the WHO list of fertilizer to the entire group?  Suggest to include WHO link into the standard for ease of reference.
174	Criteria 4.8	In the Thai NI, 7.12.3 is not relevant to Thailand (HFCC/HFCL), to consider removing it in next NI
175	Criteria 4.8	Need clarification on type of chemicals we can use clearly.
176	Criteria 4.8	Specify that the time to comply is 2 years.
177	Criteria 4.8	RSPO should include in the implementation guide the complete list of banned pesticides and include the details on the prohibition of the use of agrochemicals by pregnant or breastfeeding women and young people.
178	Indicator 4.8 E	The GHS list should list out all the prohibited pesticides. In 2019 standard, there was certain clause to allow certain chemical to be use but now not there anymore.
179	Indicator 4.8 E	no reference to WHO class 1A and B anymore, stockholm rotterdam etc - put back in? otherwise this is weaker compared to 2019 version
180	Indicator 4.8 E	In addition to the commitments, training should also be mentioned in Eligibility, whether it be riparian buffer zones, use of pesticides and storage and IPM so that they reinforce the commitments.
181	Indicator 4.8 MS A	no longer includes reference to children, pregnant and breastfeeding women explicitly - put back in? otherwise this is weaker compared to 2019 version
182	Criteria 4.9	What is the definition of invasive species introduction?

No	Criteria/Indicator	Comment (English)
183	Criteria 4.9	"Smallholder Declaration shall be signed or marked with thumb print, and submitted to Group Manager." To include this into the declaration.
184	Criteria 4.9	Make clear the definition for invasive introduced species. In some province, there are some invasive trees that are present even before they move in the area. Its a local plant (mung-k) but auditor detected the plant as invasive species. Its hard to get rid of this plant, it wont go away by cutting it.  This can be discussed in NI.
185	Criteria 4.9	It is recommended to add: Pest and Disease Management
186	Criteria 4.9	Criterion no longer specifies an aim to not damage human health, even though this has been actively incorporated into pesticide criteria under P&C - why the discrepancy?
187	Indicator 4.9 E	In addition to the commitments, training should also be mentioned in Eligibility, whether it be riparian buffer zones, use of pesticides and storage and IPM so that they reinforce the commitments.
188	Indicator 4.9 E	I consider that the IPM commitment could be attached to the ISH declaration (Annex 2).
189	Indicator 4.9 MS A	no longer includes reference to children, pregnant and breastfeeding women explicitly - put back in? otherwise this is weaker compared to 2019 version

No	Criteria/Indicator	Comment (English)
1	Criteria A1	The Thai translation of the ISH use 'jurisdictional person' instead of independent legal entity. This is not an accurate translation.
2	Criteria A1	<p>In India, the mills and the oil palm farmers (smallholders) are governed by National Mission on Edible Oils - Oil Palm (NMEO-OP) and various state palm oil acts (for ex- The Andhra Pradesh Oil Palm (Regulation of Production and Processing) Act, 1993). These laws provide for linking of the smallholders in a particular zone (region) with the mill in that zone. The government provides price and purchase protection for smallholders by setting up the prices and mandating the mills to purchase the produce (only except in some cases). The smallholders are legally mandated to sell their produce to the mill in the zone only. There are around 4-5k smallholders (minimum) linked to a mill in a particular zone.</p> <p>Further there is a strong collaboration between the smallholder and the mill right from the issuance of the sapling to commencing of fruit bearing and harvesting. The mill verifies the land ownership and crop substitution and supports in planting, training, productivity improvement and in various other aspects. Hence the "independent entity for smallholder group" is irrelevant in Indian context and not feasible since the relation is of co-dependence even though the smallholder has legal ownership of land &amp; choice to plant oil palm. The smallholders do not need to negotiate for better prices in free market and are well protected by the government. Further to maintain good practices and profitability of the industry which is facing efficiency and OER issues, the mills and smallholders essentially have to function as a collaborating unit in India. Hence the mill "must be deemed the Group Manager" for the smallholder group.</p>
3	Criteria A1	The emphasis on the group manager 'establishing membership requirements' and 'ensuring members understand these requirements'- reads like a top down approach. A strong SH group should fully involve members in agreeing and implementing membership rules. A group that relies on an individual group manager to direct the process of organisational development will be less resilient and sustainable.
4	Criteria A1	<p>The definition between different types of smallholders are not clear. In Malaysia, some smallholders whose total land are below 50 Ha registered as business entities, such as "Sdn. Bhd." (Sendirian Berhad - a private limited company) or under the category of "Enterprise". They are not eligible for RSPO certification under the RSPO Independent Smallholder Standard (RISS)</p> <p>The RSPO ruling that excludes independent smallholders with a total production area of 50 hectares or less, who are registered as companies (e.g., Sdn Bhd, Enterprise), from being part of the ISH group and certified under the RISS is unfair and not being inclusive. We recommend that smallholders be defined by their land holdings of less than 50 hectares, regardless of whether the registration is under an individual or a business name.</p>
5	Criteria A1	The legal entity could lead to misunderstanding
6	Indicator A1.1	Can the appointment of a group manager be conducted under the name of the community enterprise by using a signed resolution from a meeting instead?
7	Indicator A1.1	A resolution in the meeting should acknowledge members as representatives.
8	Indicator A1.1	The document appointing a group manager must receive approval from all group members. Is it possible to change this requirement from all group members to selected and approved representatives of the group?
9	Indicator A1.1	The presentation of the appointment documents does not require approval from all members; instead, it should be announced to inform the group members. Alternatively, representatives can be used to vote on the approval of the group manager appointment.

No	Criteria/Indicator	Comment (English)
10	Indicator A1.1	The current requirement specified an internal audit of 33% of all existing members. Does the new requirement mandate an audit of all members?
11	Indicator A1.1 E	It is proposed to have a template with checklists for legality, etc.
12	Indicator A1.1 E	The appointment of a group manager should be made by the group committee, followed by seeking approval from the group members.
13	Indicator A1.1 E	The appointment of a group manager must be approved by the group members. According to Thai law, the establishment of a community enterprise group requires approval from the group members. A committee will be established to represent the members and express their approval.
14	Indicator A1.1 E	Should we get the agreement from all members individually or approval of the whole group when setting up the enterprise?  Can the smallholder send representatives from the groups to attend the training rather than all members? What should we do if we can't send a representative? How should we comply with this?
15	Indicator A1.1E	Translation Error (A1.1E) Independent legal entity =>นิติบุคคลอิสระ (Wrong)
16	Indicator A1.2	Apply the principles of the PDPA law to be concise and clear.
17	Indicator A1.2	Apply the correct legal principles according to the PDPA law in Thailand.
18	Indicator A1.2	Add the phrase "The establishment of the RSPO group is in accordance with the law" in the indicators.
19	Indicator A1.2 E	Suggest to add the word LEGALLY. This is because some people still think RSPO is not a legal group and it is best to make it clear on a indicator level. IF you do not put legally, there are issues with PDPA (protection data collection law). The group cannot maintain or keep personal data because some may think it is against the PDPA law (since they think the group is not legal). There might be some court proceeding issues.  Suggest to improve on structure and have concern on PDPA law.
20	Indicator A1.3	Should a new Smallholder Declaration be signed?
21	Indicator A1.3 E	The informative guide on Training No. 4: Complaints should not only be for workers but for anyone involved or associated with the cooperative. The language should be changed to 'complaint handling procedure'
22	Indicator A1.3 E	Does smallholder need to sign the new smallholder declaration again? What should I do if my group is so large with many members?
23	Indicator A1.3 E	To add ' in consultation with members of group'
24	Indicator A1.3 E	The Group Manager will define and implement the requirements for small producers to become members of the group (change "membership" so there is no confusion).
25	Indicator A1.4 E	The duration for document storage is not mentioned.
26	Indicator A2.1 E	Point 3: The pricing mechanism should be replaced with the FFB sales mechanism, as in Indonesia, the pricing mechanism is determined by the government, not by the GM. (Note: sales of FFB here refer to internal sales between members to the Cooperative in cases where FFB is sold via the Cooperative to the mill, instead of members directly selling to the mill).

No	Criteria/Indicator	Comment (English)
27	Indicator A2.1 E	What are the items the auditors have to audit? Normally when we improve an annual workplan, we will have group meetings, agenda, etc. Can the minutes of meeting be considered as evidence for compliance? Can attendance be considered as evidence?
28	Indicator A2.2 E	Issue with certified and non certified FFB, is it compulsory? It is extra work to add another column to record both.
29	Indicator A2.2 E	How to measure sufficient resources?
30	Indicator A2.2 E	Change 'sufficient' resources to 'necessary' or remove the qualifier (sufficient).. What does necessary means?
31	Indicator A2.2 MS A	In the scope of training, especially in point IV on the RSPO IT Platform; which IT platform is being referred to and it needs to be specified.
32	Indicator A2.2 MS A	All personnel must undergo an introduction to the 6-point training
33	Indicator A2.2 MS A	What is the definition of 'complete' for an Overview of Human Rights and Human Rights Due Diligence? Point VI
34	Indicator A2.2 MS A	The Group manager shall have sufficient capacity (including resources) to implement the requirements of the standard (review translation).It may be an English to Spanish translation issue, please check the translation.
35	Indicator A2.3	It should be specified that the training for all 16 items is conducted continuously.
36	Indicator A2.3 E	In the informative guidance, it is stated that RSPO must develop a minimum training list, and in point 2, ethical recruitment is mentioned. What does this mean? It should be replaced with ethical behavior. In topic 5, topic on Safety and pesticides needs to be separated instead of combined.
37	Indicator A2.3 E	The training conducted is in the form of awareness
38	Indicator A2.3 E	the translation of Point 9 on the "Penggunaan api" (for land preparation and waste management) should be revised to Pembakaran terbuka (transliterated from 'open burning')
39	Indicator A2.3 E	Does the definition of training limited to classroom training? it should be expanded beyond classroom training
40	Indicator A2.3 E	Capacity development implementation should be possible on all platforms (if not included in the informative guide, it should be included in the SOP)
41	Indicator A2.3 E	When RSPO provides training for Group Manager, they should also provide some sort of examination for group manager, just a simple exam (do's and don'ts, True or False)  There are issues with finding a group manager as very few wants to be group manager. If you train or develop group manager, its good since they will have the skills to take on the role. Some who become group manager without knowing the role/having proper training might not be good at it.
42	Indicator A2.3 E	In the Informative Guidance, there are 16 items listed. Will all 16 items be audited? This needs to be clear.
43	Indicator A2.3 E	The Group Manager shall establish and make accessible to all members of the group a capacity building programme (remove 'development').
44	Indicator A2.3 MS A	The informative guide should clarify the information regarding training evidence, specifying whether it is for a period of 1 year or 2 years.

No	Criteria/Indicator	Comment (English)
45	Indicator A2.3 MS A	<p>If the group has been certified, do they need to attend annual training? After the group has been certified, does the training cover some topics or all topics?</p> <p>In cases where members are at MS B, do we have to provided training or not? Will the auditor check on this? Auditor will check understanding at MS B if all topics are covered and no new members.</p> <p>So assuming that the group has been certified in the first year and there are no new members, for year 2-5 do we have to conduct training for existing members? You will need to review where is training necessary, because there might be new information. The continuous improvement applies.</p> <p>Take note that MS B is missing continuos improvement.</p> <p>Suggest to specify and make it clearer in the indicator, so everyone have the same understanding as the auditor</p>
46	Indicator A2.3 MS A	Phased approach for the training programme that GM need to establish shd be define. Is there any time scope, etc in order to ensure all member covered. Suggestion to add ' to progressively cover all members'.
47	Indicator A2.3 MS B	Delete IV 'other applicable requirements'.
48	Indicator B1.1 E	n the compliance requirements, point A should be added with the word "procedure" so it becomes "Operational Management Procedures include":
49	Indicator B1.1 E	The results of the internal audit should not be used for the initial audit; if for surveillance, it must be included
50	Indicator B1.1 E	The 'smallholder declaration' should not only be available in hardcopy but also accessible on all platforms
51	Indicator B1.1 E	<p>Previously the Excel sheet was used to calculate the sampling. In the new standards, there will not be risk assessment as all will be put as high risk to simplify the calculation.</p> <p>In order to audit from Y2 to Y5, will SH use this formula to calculate? The calculation includes all.</p>
52	Indicator B1.1 E	Change to: 'The Internal Control System shall contain a procedure for conducting internal audits'.
53	Indicator B1.1 MS A	Is it possible for the mill's internal audit team to carry out the ISH group's internal audit instead of the group manager?
54	Indicator B1.1 MS A	English take off "By the risk assessment", but in thai doesn't take off "โดยการประเมินความเสี่ยง"
55	Indicator B1.1 MS A	During internal assessments, all members must be evaluated within 5 years (one certification cycle), as per the old requirements, correct?
56	Indicator B1.1 MS A	New formula for auditing sampling is more straight forward and clear
57	Indicator B1.1 MS A	Change from 'plots' to 'members (plots per producer). Please review the term in the formula description
58	Indicator B1.1 MS A	The formula applied does not change compared to what was requested in the 2019 standard, this makes the internal audit process not cost-effective and time-consuming for ISH groups.
59	Indicator B1.1 MS A	I consider that 50% of the members should be kept in MS A for sampling (and not by plots) because they are advancing and incorporating towards the final objective; otherwise for the MS B where the proposed formula could be applied.



No	Criteria/Indicator	Comment (English)
60	Indicator B1.1 MS B	I consider that 50% of the members should be kept in MS A for sampling (and not by plots) because they are advancing and incorporating towards the final objective; otherwise for the MS B where the proposed formula could be applied.
61	Indicator B1.2 E	Smallholder Declaration: for the standard 2019 is it the same as before? It is suggested to add various platforms to make the documents more accessible.
62	Criteria C1	Translation on group business plan is not correct.
63	Criteria C2	Add guidance on the contents of the plan
64	Indicator C1.1	It should be reviewed annually.
65	Indicator C1.1 E	Comment that every plan should be reviewed annually instead of 2 years. It is easier to coordinate. The reason why we prefer yearly, is due to the PalmTrace certificates. We will have to share information etc during annual meeting. We can coordinate all details in a single meeting.
66	Indicator C1.1 E	Remove the word 'contribution' because it is subjective in its evidence
67	Indicator C1.1 E	Business plan - translation Issue
68	Indicator C1.1 E	The review of the group's business plan should continue to be on an annual basis, as this process of implementing the standard must be reviewed financially by the group.
69	Indicator C1.1 MS A	The annual meeting, all the plans will be revised, it will not synchronize well if reviewed every 2 years. More convenient to review annually instead of every 2 years. Other teams' comment - certain groups cannot do it every year.
70	Indicator C1.1 MS B	Translation in French, suggest to change according to the business plan to according to this plan.
71	Indicator C1.1 MS B	Change the frequency review to every year instead to evaluate whether the SH is capable to continue with the RSPO certification.
72	Indicator C1.1 MS B	Same as Milestone A text, but with Action Plan: 'The Group Manager will implement the Group Business Plan will review it every two years and define an Action Plan to enable it to maintain certification'
73	Indicator C2.1 E	Suggest reviewing the plan every year. Same comment as above.
74	Indicator C2.1 MS A	smallholders' business plan to be replaced with smallholders' business results.
75	Indicator C2.1 MS A	Implementation of the plan should be replaced with the word 'realization'
76	Indicator C2.1 MS B	Asking about the business plan review frequency in the P&C. The issue raised is not as risky.
77	ICS C1 & C2 and D1 & D2	Too much emphasis on the Group Manager establishing, developing and implementing. Only in C1.1 E is participation and contribution of the group members mentioned. This should be throughout. The plan should be a group plan and group members should see its implementation as a group responsibility they share with the Group Manager, not something that the Group Manager does for them and to them.
78	Criteria D1	The phrase 'if any' is confusing; it should not have a comma before it, as it changes the meaning.

No	Criteria/Indicator	Comment (English)
79	Criteria D1	Why are these changes being proposed- is this based on problems in implementing the existing version of the ICS criteria?  We suggest that it could be included in EUDR add on module- and revert to 2019 approach for everyone else.
80	Indicator D1.1	Regarding the "Track of the monthly FFB production and sale" should be extended from monthly to every three months.
81	Indicator D1.1	The collection of FFB production and sales data should be done every 6 months instead of monthly.
82	Indicator D1.1	Tracking FFB production on a monthly basis might be challenging to achieve 100%, but tracking it quarterly or every 6 months is more feasible.
83	Indicator D1.1	Sales the FFB as a conventional should be reported every 3-4 months. Monthly production reporting is very challenging unless the sales are within the SCC system.
84	Indicator D1.1	Data collection for production should be changed to every 3 months for easier data management.
85	Indicator D1.1	Monthly data collection on production for smallholder farmers is not feasible, as they do not record data every month. It would be more suitable to collect data every 6 months, as this aligns better with the practices of smallholder farmers and provides the group with more time to gather information from a large number of members and plots.
86	Indicator D1.1 E	FFB - first buyer only and every 6 months. Don't want to do on monthly basis.
87	Indicator D1.1 E	Proposed "quarterly" instead of monthly
88	Indicator D1.1 E	The system for monitoring the production of FFB currently requires monthly reports. It should be changed to a 6-month basis, as monthly reporting is not feasible for farmers and creates a burden for submitting data to the group.
89	Indicator D1.1 E	It should be specified that records are to be kept every 3 months instead of every month, as monthly recordings are too frequent and may lead to an overwhelming workload, increasing pressure on the group manager.
90	Indicator D1.1 E	FFB recording should be extended from every month to every 6 months to allow time for data collection due to the dispersion of smallholders.
91	Indicator D1.1 E	Do we need to know the origin of the non certified FFB? The scope is for certified FFB, but it is good practice to know the origin of the non certified as it eventually becomes certified.  Suggest for it to be quarterly production instead of monthly as it takes some time to check because they have a lot of workload. Some group keep the record and they have monthly or yearly data anyway.
92	Indicator D1.1 E	Translation in French need revision
93	Indicator D1.1 E	- Leave it 'annual' not 'monthly'. - It would be very costly to maintain this information with very large groups. - The EC delivers the annual volume, which the group cannot go beyond.
94	Indicator D1.1 MS A	Proposed "quarterly" instead of monthly
95	Indicator D1.1 MS A	It should be clearly specified that they are the first buyer.
96	Indicator D1.1 MS A	Monthly records is doable for documentation. However, they need justification why it is changed from annually to monthly. Every three months is suggested for this indicator.

No	Criteria/Indicator	Comment (English)
97	Indicator D1.2	Sales data collection should be concluded at the Mill or the collection center, which will be more convenient for farmers and the group.
98	Indicator D1.2	The sell records should only include sales of palm fruit to the first buyer.
99	Indicator D1.2 E	The development of a procedure for fruit production will help the group's administrative entity to monitor the delivery of certified fruit, since it will take into account all the factors or elements that may involve the projection of fruit.
100	Indicator D2.1	When filling out forms in the PRISMA system, it should not be overly complex with extensive record-keeping, and uploading picture of invoices into the system should not be excessive.
101	ICS	Exclude off-market deals due to lack of transparency
102	ICS	Strengthen shared responsibility of RSPO
103	ICS	Is it required to sign the ISH declaration again for any new version?