

No	Criteria/Indicator	Comment
1	1.1.1	<p>Feedback for the compliance requirements section related to indicator 1.1.1: We recommend mentioning that the documents listed under 'scope' should be shared with the relevant stakeholders, to be understood as: registered labour unions, Bipartite Cooperation Institutions (LKS Bipartit) and concerned employees.</p> <p>Besides, we suggest that extra documents should be included in the list of the scope, especially when the company is experiencing a financial crisis that affects industrial relations, namely:</p> <ul style="list-style-type: none"> - Termination of labour relations (PHK); - Delay in payment of wages and holiday allowances (THR); - Discussion of living wage adjustments; Social security protection. – - Company Agreement (PP) and/or - Collective Bargaining Agreement (CBA) documents
2	1.1.1	Agreed and support this comment
3	1.1.2	<p>Feedback for the compliance requirements section related to indicator 1.1.2 (C): We suggest to reformulate and expand the following statement (see part in bold for adjustment):</p> <p>"Implementation of compliance requirements for consultation and communication with relevant stakeholders must be carried out in an appropriate language and format and carried out periodically and scheduled for refreshment and familiarization. The Information Manual is implemented regularly, at least once every six months, and includes:</p> <ul style="list-style-type: none"> - OHS SOP. - PPE Availability and PPE Replacement Procedures - Complaints and grievances SOP."
4	1.2.1	<p>Feedback for the scope section in the compliance requirement section related to indicator 1.2.1: Add the following bullet point to the list:</p> <p>"Respect for human rights, including the rights of affected communities and workers.</p>
5	1.3.1	The Unit of Certification shall identify existing and potential business and human rights impacts within its operations and in the whole upstream value chain, not just its direct supply chain annually,
6	1.3.1	<p>Propose to changes as follow:</p> <ol style="list-style-type: none"> 1.) The term "direct supply chain" change to "direct suppliers". 2.) The term "updated" change to "reviewed" 3.) The HRDD action plan shall be reviewed updated at least once every 2 years.
7	2.1.3	Suggestion to add: "Evidence of the Unit of Certification's legal status of business operations and legality of land operations shall be available. Legal land boundaries shall be physically demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries."

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8	2.2.1	Feedback for the compliance requirements section related to indicator 2.2.1: Add 'incorporated' to the following sentence: "(...) that the coverage specifically includes incorporated security companies."
9	2.2.2	Suggestion to add: "This must be demonstrated by a third party."
10	2.3.2	An action plan to meet 100% of traceability should also be required
11	2.5.1	Feedback for the compliance requirements section related to indicator 2.5.1: Reformulate point C to not only consider, but also ensure the needs of women and children, resulting in the following sentence: "C) Consider and ensure the (special) needs of women and children" Besides, we would like to see included under the 'implementatoin header' that it should be ensured that the team that is involved in grievance handling, has knowledge and skills, particularly in handling cases related to women and children, land conflicts, etc. If this is not the case, the UoC should work with an organisation that can resolve such conflicts.
12	2.5.2	Suggestion to add: "The Unit of Certification shall monitor and demonstrate the effectiveness of such Grievance Mechanism through social research by an independent third party body."
13	2.5.3	<ul style="list-style-type: none"> • "resolves disputes in an effective manner" is missing now. The evaluation of effectiveness of the grievance mechanism is still not covered by this indicator. The evaluation of the effectiveness is very important to promote better management of the grievance mechanism and hence minimise the risk of grievance turning into complaint. • The grievance mechanism system should also follow the "Effectiveness Criteria of the UN Guiding Principles on Business and Human Rights": https://www.ohchr.org/sites/default/files/Documents/Issues/Business/Intro_Guiding_PrinciplesBusinessHR.pdf <p>The rationale of this suggestion is also to be more aligned with the existing global principles so that we can enhance the use of common language on the effectiveness of the grievance system, and also express a more explicit goal to create and implement an 'effective' grievance system.</p> <p>Suggest to add one indicator : "The effectiveness of grievance mechanism shall be evaluated in consultation with stakeholders every three years. The evaluations shall be documented."</p>
14	2.5.3	We would like to see an extra bullet point that states that the information is publicly available: "(F) Information related to the grievance registered is publicly available"
15	3.3.2	Feedback for the 'informative guide' column related to indicator 3.3.2: Add an additional bullet for labour rights under the lists with impacts for the SEIA assessment. Proposa: "(M) Assessment of violations of labour standards that refer to decent work criteria, including Freedom of Association, social security, social dialogue, fulfilment of OHS, and workers' rights.
16	3.4.1	...shall conduct estimates... Suggest change to "...shall conduct annual estimates..." The suggestion: The Unit of Certification shall conduct annual estimates of its and potential fresh Fruit Bunch (FFB) yields.

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17	3.4.2	<p>Changes and trends in soil fertility and plant nutrient levels are monitored, documented, and managed for optimising soil fertility. To add "except for those undergoing replanting."</p> <p>(also worth mentioning frequency of the analysis).</p> <p>The suggestion: Changes and trends in soil fertility and plant nutrient levels are monitored, documented, and managed for optimising soil fertility, except for those undergoing replanting.</p>
18	3.4.3	The Unit of Certification shall follow and implemented... grammatical suggest to change "implemented" to "implement"
19	3.4.3	Suggestion to add: A nutrient recycling plan for the Unit of Certification shall be developed and implemented. The nutrient recycling plan shall includes the recycling of biomass (i.e., Empty Fruit Bunches (EFB)), Palm Oil Mill Effluent(POME), palm residues and optimal use of inorganic fertilisers.
20	3.5.5	What does "level" mean? What is it referring to?
21	4.1	<p>Revised text: The Unit of Certification shall respect rights of communities over lands and resources as well as minimise environmental impacts</p> <p>Justification: This criteria includes EIAs as well as SIAs which are no longer included under Principle 7 - so reference should be made to the environment and EIA here</p>
22	4.1.1	Feedback for the scope described under the informative guide related to indicator 4.1.1: Add that the scope for the stakeholder mapping must be identified in detail, especially when it comes to vulnerable groups such as women, disabilities, indigenous peoples, and children (all groups that have UN conventions).
23	4.1.1	<p>For existing plantations and/or developments established before November 2007, the Unit of Certification shall provide evidence that the following have been prepared and implemented:</p> <p>Justification: The key issue is not that the grower has the EIA/SIA document etc but that they have implemented the requirements etc</p>
24	4.1.2	<p>- Feedback for the scope described in the 'Informative Guidance' related to indicator 4.1.2: Suggestion to add: "In affected communities in locations that have certain specificities such as customary law, special autonomy, conflict-prone, during the data collection process extra attention should be paid to the do no harm principles.</p> <p>- Feedback for the Compliance Checklist column related to indicator 4.1.2: We consider it highly desirable to include as a bullet:</p> <p>"- Information related to the status of land rights, whether individual, communal, or Ulayat (customary)."</p>
25	4.1.2	<p>Adjust wording: For existing plantations and/or developments established after November 2007, the Unit of Certification shall provide evidence of of preparing and taking necessary actions based on the following:</p> <p>Justification - having an EIA, SEIA etc is not enough - but implementing the recommendations or approval conditions is also needed.</p>

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26	4.1.3	Feedback for the compliance checklist related to indicator 4.1.3: Specific wording on the language should be added to the first bulletpoint, resulting in: 'Evidence of a documented process for stakeholders to communicate with the UoC, in a language they all understand, related to UoC operations.'
27	4.2.1	Suggestion to add: Indirect or hidden pressures for community members or land owners to sign documents should be monitored through social research techniques. FPIC process should also be in line with EUDR requirements.
28	4.2.2	Input on formulation of indicator 4.2: need to specifically highlight people with disabilities and minority groups. Resulting in: The Certification Unit shall obtain Free, Prior and Informed Consent (FPIC) from affected communities for all new plantings and/or related developments. The FPIC process shall be iterative, well documented, and accessible for people with disabilities and minority groups. The process must allow affected communities to express their views and seek redress.
29	4.2.4	Suggestion to add: "The review is conducted by an independant 3rd party organisation with good relations to community members using social research techniques. Gaps in implementation shall be identified during annual monitoring and corrective action shall be taken."
30	4.3.2	- Rephrase the formulation of criterion 4.3.2 to: The Conflict Resolution System should be publicly available and socialised to stakeholders (including illiterate parties and identified targets). - Feedback for the guidance column of the Implementation section belonging to indicator 4.3.2: Add the word 'Implementation', and change the instruction to: "If necessary, the System and its processes should be explained to stakeholders orally. An interpreter and a community subject matter expert should be engaged for this purpose to improve the understanding of vulnerable groups. - Feedback for the the Compliance Checklist column belonging to indicator 4.3.2: Add that a language should be used that is understood by all stakeholders, resulting in the sentence: "Evidence that stakeholders are aware of the System and its processes through written and oral explanations and UoC engagement in a language that the target stakeholder group understands, especially vulnerable groups." - Add to the information Guide section: 'A Subject matter expert means an expert on the intended target group, often a member of this group, as the reader of the policy' (for example: if the socialisation is carried out to indigenous Papuans, then there must be an expert on the indigenous Papuan community).
31	4.3.2	- Feedback for the implementation section: the conflict resolution system should match and can therefore differ for different groups of rightholders. - General feedback point: There should be a minimum technical guidance on the internal conflict resolution system. - Information about the system is available, just like the system itself. The documentation is clear, which means that it is adapted to local languages, and understandable for all stakeholders.

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32	4.3.2	<p>- Feedback for the implementation section: the conflict resolution system should match and can therefore differ for different groups of rightholders.</p> <p>- General feedback point: There should be a minimum technical guidance on the internal conflict resolution system.</p> <p>- Information about the system is available, just like the system itself. The documentation is clear, which means that it is adapted to local languages, and understandable for all stakeholders.</p>
33	4.3.3	- Feedback for the Compliance Checklist belonging to indicator 4.3.3: Reformulate the first bullet point to: "UoCs with cases must include records and documentation of cases brought to the conflict resolution system."
34	4.3.5	<p>- Formulation of the indicator: Add that all involved parties should possess the documentation. Resulting in the sentence: "Steps taken to resolve the proposed conflict, should be documented, maintained, kept up to date and in the possession of all involved parties."</p> <p>Feedback for the column of informative guidance belonging to indicator 4.3.5: Add why it should be in the parties' possession, i.e. to ensure transparency and accountability of the process. Ensure that the other party understands different documentation.</p>
35	4.4.1	<p>Suggestion to add to the Informative Guidance section of indicator 4.4.1:</p> <p>"The certification unit should understand the roles and perceptions of the community in the planning and decision-making process. In communities where one group's voice is not included, the company should do as much as possible to involve it."</p>
36	4.5.1	Feedback to the formulation of the indicator: Add 'by the companies' operations' to the sentence, resulting in: "The Certification Unit shall consult with communities affected by the companies' operations on its proposed contribution to community development. Such consultation shall be documented."
37	4.5.2	Feedback to the formulation of the indicator: Add an extra sentence, resulting in: "Community development (...) on community needs. These community needs are based on the results of the social impact assessment analysis and social management plan in accordance with 4.1.1."
38	4.5.3	<p>Feedback to add the following statement to the informative guidelines belonging to indicator 4.5.3:</p> <p>"In order to conduct monitoring and consultation, a joint committee of the UoC and the Community should be formed (ensuring representation of vulnerable groups). The functions and roles of the committee include developing and agreeing on monitoring and consultation outcomes indicators."</p>
39	4.5.4	Add to the informative Guidance that UoC should provide opportunities for affected communities to benefit from its business operations, including potential employment, royalty payments, or consideration for decision-making roles within the UoC. The choice of such benefits should be based on mutual discussion and agreement. Affected communities should be informed of these opportunities. If candidates for employment within the UoC have similar abilities and skills, preference should be given to affected community members. Positive discrimination is recognised as not in conflict with Criterion 6.1. If the benefit option for which capacity is agreed does not exist in the community, the UoC should provide assistance and capacity building.
40	5.1.1	For point C, "Fair pricing, including FFB premium pricing": it is suggested to add "(when applicable)."
41	5.2.3	Proposal to amend current wording of 5.2.3 to recognize the potential of increased agrobiodiversity in plantations to contribute to livelihood improvements of smallholders.

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42	6.1.1	<p>Should be more specific: "The non-discrimination policy shall include prohibition against discrimination based on: a)Race, color, sex, sexual orientation, gender, caste, religion, political opinion, national extraction or social origin; b)Nationality or migratory status; c)Civil status; d)Medical condition; e)Family condition, including pregnant women and parents with children, or any other protected status as included in applicable laws; f)Worker organization membership or being an organizer; g)Having filed complaints within the complaints or grievance mechanisms; h)Unequal opportunities for gender when appointing management positions; i)Political, religious, social, sexual or cultural opinions and convictions, views or affiliations of workers."</p>
43	6.1.4	<p>Add the following statement to the new proposed indicator 6.1.4:</p> <p>"The Certification Unit shall establish and implement an affirmative action policy that includes education and skill development programs, as well as setting recruitment quotas for workers with disabilities and local communities surrounding the plantation area."</p> <p>In practice, the recruitment process has not provided equal opportunities, as local communities are often deemed to lack the required standards, such as education, skills, or discipline. To address this disparity, the company must implement affirmative actions, including skill development programs and reserved recruitment quotas for local communities and people with disabilities. This will fulfil the promises made during the initial consultation, provide tangible benefits to local communities, and help to mitigate potential conflicts.</p>
44	6.2	<p>Feedback to indicator: The term "minimum" must be removed from the criterion sentence to ensure clarity and avoid multiple interpretations. The revised sentence is: "Working and living conditions for all Workers must meet legal or industry standards that ensure a decent living." This change is made to prevent certification units from adhering only to minimum requirements, which may lead to a lower standard of worker welfare. In some countries, minimum wages might not be enough to have a decent living. The addition of the phrase "that ensures a decent living" emphasizes the importance of providing working conditions that align with the International Labour Organization (ILO) standards on decent work and living conditions. This change ensures that companies not only comply with legal or industry standards but also focus on providing conditions that promote the well-being and dignity of workers.</p>
45	6.2.1	<p>The document shall be made available upon request...Suggest add "...upon request by the relevant stakeholder."</p> <p>The suggestion: The Unit of Certification shall establish and implement procedures for recruitment, selection, hiring, promotion, retirement, suspension, and termination. The procedures shall be documented, socialised and made available to all workers. The procedures shall be documented, and socialised to all workers. The document shall be made available upon request by the relevant stakeholder."</p>
46	6.2.2	<p>Payments for workers need to be in line with a living wage! (please, also see: https://globallivingwage.org/)</p>

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47	6.2.4	Add the following statement to the new proposed indicator 6.2.4: "Data related to terminations with potential industrial relations disputes should be accessible to relevant stakeholders or parties." Some industrial relations disputes take a long time, for example, more than five years, and during the dispute process, the parties have the right to access the data.
48	6.2.4	Suggest to change the duration of data storage from 5 years to 2 years. This aligns with document storage requirements for the supply chain requirement as well as national regulations.
49	6.2.5	Feedback to amend indicator 6.2.5: It is suggested that the sentence in indicator 6.2.5 be revised to reflect the language from indicator 6.2.7 P&C 2018: 'Permanent and full-time employment shall be used for all core work performed by the certification unit. Casual, temporary, and daily labour should be limited to temporary or seasonal work.' This change ensures consistency and clarifies the employment standards for core work within the certification unit.
50	6.2.8	Add WHO housing health guidelines to the indicator and not only ILO to point a). The minimum number of bedrooms is three rooms with a distribution of 1 room for parents and 2 rooms for children by considering gender differences. The housing site must have a safe buffer zone from the plantation site. National interpretation should define the buffer zone distance parameter. The housing accommodation must be safe and healthy, with a minimum of three bedrooms—one for parents and two for children, considering gender differences. A safe buffer zone must be maintained between the housing site and the plantation, with the buffer zone distance defined by national interpretation. The ILO Guidance on Workers' Housing Recommendation, 1961 (No. 115), may also be referred to if no applicable laws are available. Accommodation provided for Workers living within the Unit of Certification shall include adequate and safe housing, sanitation facilities, water supplies (including potable water), and access to medical, educational, and welfare amenities.
51	6.3	Add the following statement to the criteria: "in accordance with the RSPO Wage Calculation Procedure, conducted transparently with the involvement of worker representatives and/or trade unions."
52	6.3	It is not enough to calculate the prevailing wages annually. It would also have to be determined whether and to what extent there is a wage difference. If there is a wage gap, there must be mechanisms to close the wage gap.
53	6.3	unclear why only one indicator under 6.3 - this is labelled as the first step towards living wage, so what are the following steps?
54	6.4.1	Feedback to the following indicator 6.4.1: divide the indicator into two indicators for each sentence. Dividing them into two indicators separates the content and creation of the policy (the substance of workers' rights and CBAs) from its transparency and availability (making the policy accessible to the public). This division clarifies auditing and implementation, as one indicator can focus on whether the policy exists and is in effect, and the other can focus on whether it is publicly accessible.
55	6.4.2	should be upgraded to a critical indicator C

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56	6.5.1	<p>Add this to the following indicator:</p> <p>Before establishing and implementing a child protection policy, the Certification Unit must carry out a child rights impact assessment with reference to the RSPO child rights technical baseline. This assessment can be conducted in conjunction with the Social Impact Assessment or HRDD.</p> <p>Add this to compliance requirements:</p> <p>The policy should outline clear guidelines and procedures for investigation, penalties/sanctions, and remediation of incidents including the provision of complaint centers and safe houses for victims of sexual violence and harassment.</p>
57	6.5.2	<p>Please return to: 6.4.2(C) The Unit of Certification shall not employ workers below the age of 18. An age screening verification procedure shall be documented.</p> <p>6.4.3(C) Apprenticeships for young people over the age of 15 and below 18 organised for the purpose of education and training are permitted under supervision. Apprenticeships of young workers shall not interfere with schooling nor be harmful to their health or development.</p> <p>Also, it should be ensured that no permanent work is covered as apprenticeship.</p>
58	6.7.2	<p>The term grievance is currently not defined in the definitions section. Participatory approach and social research techniques should also be mentioned in this section.</p>
59	6.7.2	<p>Feedback for Indicator 6.7.2 (C):</p> <p>"Rename the committee back to Gender Committee as it covers broader workplace issues, such as discrimination, safety, and grievances. The name Women's Welfare and Empowerment Committee may lead to misinterpretation, focusing more on social or religious activities, rather than critical workplace rights like maternity leave, fair wages, and protection against harassment."</p> <p>In the Informative Guide column, the Gender Committee's duties should include:</p> <p>Identifying risks and improving conditions for women workers.</p> <p>Raising awareness about women's health and safety, including maternity and postpartum services.</p> <p>In the Compliance Requirements column:</p> <p>The Gender Committee should include both female and male workers, along with management. It should handle issues such as discrimination and workplace safety, decide its meeting frequency, and have access to a safe meeting space. Actions must be documented, and if no action is taken, the Certification Unit must provide a reason. The UoC can seek external support if needed.</p>

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60	6.8.1	<p>Input for indicator 6.8.1 related to Compliance checklist:</p> <p>Ensure the existence of policies and procedures on:</p> <p>A. Identifying potential risks of forced labor and human trafficking.</p> <p>B. Communicating the results of risk identification for forced labor and human trafficking.</p> <p>C. Documenting training, prevention, and remediation plans for forced labor and trafficking.</p> <p>D. Remediation of recruitment costs and related expenses.</p> <p>E. Special employment procedures for migrant workers (if applicable).</p> <p>Notes:</p> <p>These policies and procedures must be included as preconditions or terms in contracts with suppliers and contractors.</p> <p>Evidence required:</p> <p>Proof of policy communication to current and prospective workers, suppliers, and contractors.</p> <p>Proof that the policy is publicly accessible.</p>
61	6.8.4	"...related costs. Suggest to specify the related cost i.e., levy, immigration processing fee, etc.,
62	6.8.8	Suggest to add : "Align with National regulations."
63	6.9	Add this sentence to the following criteria: occupational diseases such as mental health, reproductive health, impacts from chemicals, and ergonomics.
64	6.9.1	Feedback on "a language that they understand" to easily understand.
65	6.9.2	The committee shall meet quarterly." Suggest to change/add to "The committee shall meet quarterly or immediately following any significant safety incident"
66	6.9.2	<p>The HIRARC shall be conducted by competent personnel who has been trained in HIRARC assessment. The HIRARC shall be reviewed and approved by an authorised health and safety officer". Suggest to resentence to "The HIRARC shall be conducted by personnel that has sufficient knowledge in HIRARC assessment. The HIRARC shall be reviewed and approved by the appointed unit of certification's safety in charge."</p> <p>The suggestion:</p> <p>The Unit of Certification shall conduct hazard identification, risk assessment and risk control (HIRARC) on its mills and estates respectively, to identify health and safety issues including, gender specific impacts (e.g. impact of pesticides on reproductive health, pregnant women, young workers, suitable job-specific Personal Protection Equipment (PPE), persons with disabilities). The HIRARC shall be conducted by personnel that has sufficient knowledge in HIRARC assessment. The HIRARC shall be reviewed and approved by the appointed unit of certification's safety in charge.</p>

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67	6.9.7	Add this to the following indicator: "including guidance to use first aid kit. "
68	6.9.11	Add this to the following indicator: provide medical care and mental health services for all workers and their families and coverage for occupational and other accidents.
69	6.9.11	Agreed and support this comment.
70	7.1	Add : "and avoid and reduce the use of restricted and hazardous chemicals" Justification: The deletion of the words "to avoid and reduce the use of restricted and hazardous chemicals " from the Criteria - sends a signal that RSPO is not interested in restricting or stopping use of hazardous chemicals .
71	7.1	Criterion has a note about NI determining specific best practices etc., then lists a series of issues which are covered in this indicator and elsewhere. Unclear whether NI or the P+C takes precedence - needs clarifying throughout as this format is the same for several criteria
72	7.1.1	The Unit of Certification shall develop and implement an Integrated Pest Management (IPM) plan. (cut unnecessary words)
73	7.1.2	Restricted and hazardous pesticides/herbicides, that endanger health of workers, families, communities or the environment, shall be not be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. (stop here, the remaining text much more related to guidance level)
74	7.1.2	It seems a lot has been removed compared to 2018 P&C here, and not clearly incorporated elsewhere. This includes: - Criterion 7.2 from 2018 P&C: "Pesticides are used in ways that do not endanger the health of workers, families, communities, or the environment" - Requirements regarding storage of pesticides - Requirements regarding disposal of pesticides - Restrictions on handling of pesticides (e.g. by children, pregnant or breast-feeding women, those with relevant medical conditions) We're concerned that these things no longer seem to appear as requirements in the P&C and that this is a potential weakening of the standard
75	7.1.2	Agreed and support ZSL's comment
76	7.1.2	also support ZSL comments
77	7.1.2	It is better to retain the description of due diligence for pesticide use here as it gives more details compared to that specified in the Definitions (unless due diligence for pesticide use is added as a separate definition
78	7.1.5	Targeted spraying with unmanned aerial vehicles (drones) is permitted. Suggest to set an acceptable radius, possibly in meters.
79	7.1.6	not clear on indicator. much related to reference
80	7.1.8	Suggestion to change: "Open burning for pest or disease control is strictly prohibited."
81	7.2.4	The use of fire Open burning as a measure for waste disposal shall be prohibited, unless in exceptional circumstances. and d Direct disposal of waste into watercourses or other ecosystems shall be...(the words is hanging or it was hide?)
82	7.2.4	The use of fire as a measure for waste disposal shall be prohibited, unless in exceptional circumstances. Direct disposal of waste into watercourses or other ecosystems shall be..... (wording is hanging). Suggest to provide some acceptable example.

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83	7.3.2	Ideally there should be no replanting of steep areas. For the proposal to be accepted there needs to be a definition of extensive planting of steep lands. This can draw on definitions in previous P&Cs - eg less than cumulative 50ha or 2% of the entire managed area.
84	7.3.3	The terms extensive and limited planting need to be defined.
85	7.4	Revise last sentence to " All set aside and unplanted peatlands shall be protected and conserved. Justification: This is to bring it in line with the requirements of RSPO since 2018 (indicator 7.7.7) that all unplanted and set aside peatlands in the managed area are protected as peatland conservation areas. Therefore the working in P&C 2024 should be protected and conserved. Using the term managed responsibly implies that they may be exploited or used in a way other than for conservation. This would be a significant step backwards.
86	7.4.2	Adjust the additional clause to: "The Unit of Certification shall make its map and other inventory information available to the RSPO Secretariat" According to the RSPO Peat Inventory Template adopted in 2019, it is not just the map that needs to be sent to the RSPO secretariat but the table with data on area of planted and conserved peatlands, information sources, date of survey or adjustment etc etc. so that RSPO secretariat can track and analyse any changes.
87	7.4.3	Modify to: Any activities by the Unit of certification that may disrupt peatland ecosystem integrity or hydrology including new construction of drains, roads, dams, bunds, levees and/or power lines, on unplanted set-aside peatlands shall be prohibited. Justification: This is to clarify that it is the actions by the unit of certification that is prohibited. Sometimes roads or powerlines may be constructed by the government which may be outside the control of the company (although they should show evidence of objections)
88	7.4.4	Adjust indicator to: The Unit of Certification shall protect and manage all set-aside (including all unplanted) peatlands, guided..... Justification: The 2018 P@C in indicator 7.7.7 states that "All areas of unplanted and set aside peatlands in the managed area are protected as peatland conservation areas..... are managed in accordance with the RSPO BMP manual..." It is clear that the manual applies to all set aside areas ie HCV or conservation areas as well as any other unplanted areas. The current wording of the 2024 P&C "set aside (unplanted) peatlands ..." is a bit confusing as it may imply that set aside areas may just refer to areas of peatland not yet planted and not including existing conservation areas.
89	7.4.5	Expand second sentence as follows: "This shall include monitoring and minimising of peat subsidence; documented water and ground cover management; and fire prevention and control. Justification: Fire prevention and control is one of the key elements emphasised in the Peatland audit guidance
90	7.4.6	To determine the suitability of replanting on peat, the Unit of Certification shall conduct a drainability assessment for oil palm planted on peat at least 15 years after planting or replanting with an approved Drainability Assessment Procedure report.

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91	7.4.6	<p>To determine the suitability of replanting on peat, the Unit of Certification shall conduct a drainability assessment for oil palm planted on peat in line with the RSPO Drainability Assessment Procedure starting 15 years after planting or replanting and receive approval of a Drainability Assessment Procedure Report, prior to replanting</p> <p>Justification: The detailed procedure for drainability assessment is given in the RSPO Drainability Assessment Procedure (DAP). This should be referenced in the indicator.</p> <p>In the approved procedure the requirement for replanting the first generation and the subsequent generation is exactly the same - but the new draft Indicator gives a different requirement for first and subsequent generations which is not correct.</p> <p>The Phrase at least 15 years makes no sense as this could mean 15, 20 or 100 years. The correct term (in accordance with RSPO procedure) is "starting at 15 years after planting or replanting" - when an initial analysis and determination is made. The company can accept this or can submit to RSPO a revised calculation (based on additional data collection) up to two years prior to replanting. There is no need to include these additional details as they are all included in the DAP. The current phrase "at least 15 years after first planting" is not auditable (as grower could propose 100 years!). The phrase "5 years before replanting" is also impossible to audit (as the grower could just state the replanting is to be delayed to more than 5 years after the audit - hence no drainability assessment is needed)</p>
92	7.4.7	<p>Modify to: Where a Drainability Assessment Report indicates a phasing out of oil palm cultivation of at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat, the Unit of Certification shall develop and implement a plan to replace with crops suitable for a higher water table (paludiculture) or to rehabilitate with natural vegetation.</p> <p>Justification: 1. Need to clarify that this refers to a drainability assessment not any other assessment. 2. It is a requirement under the DAP that companies not only develop a plan for phasing out oil palm but that they also implement it. This is a critical issue for the auditor to check on. The company cant just continue to manage and harvest existing oil palm and when the DAP has indicated that it should not be replanted. Once the specified replanting year has passed the Company should stop managing and harvesting the oil palm and should raise the water level and convert it back to natural vegetation or paludiculture (depending on the plan) .</p>
93	7.5.1	<p>The Plan shall include among others the following elements:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water c) the Unit of certification shall not lead to any pollution or contamination of surface water or groundwater or affect the availability of water for the downstream environment</p> <p>Justification: Addition of item c is to emphasise that the water management plan is not just about drinking water but water for the environment</p>

No	Criteria/Indicator	Comment
94	7.6	The word pollution should not be changed to air pollution unless it is made very clear that the water management plan under criteria 7.5 will deal with all water pollution issues including from the Mill, agrochemicals, soil erosion etc.
95	7.6.3	The unit of certification shall.....(improve indicator wording)
96	7.7	<p>Proposed alternative text: Land clearing does not cause deforestation or damage any area required to protect and/or enhance High Conservation Values (HCVs) and/or High Carbon Stock (HCS) forests. HCVs and HCS forests in the managed area are identified and protected and/or enhanced.</p> <p>Issues with wording in the draft shared: - It wrongly refers to "HCV areas" when what must be protected are the HCVs - Includes peatland that is covered in its own indicator (duplication) - Is repetitive in mentioning RTE species (already covered as HCV1)</p>
97	7.7	In agreement with Ruth's points above. Particularly that this should refer to 'HCVs' not 'HCV areas'. Note that the 2018 P+C refers to HCVs, so changing that language here would be a weakening compared to 2018.
98	7.7	The definition of forest and deforestation needs to be broaden in the 2024's P&C. The current wording is not aligned with definitions used by the FAO and the Accountability Framework Initiative (AFI). To maintain consistency with international frameworks like AFI and EUDR, it is essential to provide clear and distinct definitions for deforestation, and Forest. Consistency in these definitions is crucial to ensure the added value of the standard for its end-users.
99	7.7	Adding our support for what HCVN has stated here.
100	7.7.1	To improve indicator word. The unit of certification shall...
101	7.7.1	Support for what has been stated by HCVN and ZSL. In addition, following what was stated by ZSL regarding the BHCVWG, this should be accounted for as it was discussed by the WG which understood that this would in turn be put into the updated document.

No	Criteria/Indicator	Comment
102	7.7.1	<p>Propose splitting this indicator into 2 indicators (one referring to historical clearance, the other to new clearance). The P&C 2018 indicator 7.12.8 is integrated into the indicator related to historical land clearance, Changes are also suggested to ensure implementability (how values are identified), to recognise the 2018 transition scenarios, and avoid lowering the standard (independent assurance of identification is maintained): 7.7.1. (C) A Unit of Certification shall not damage Primary Forest and HCVs (from November 2005) and HCS Forests (from 15 November 2018). HCVs, HCS forests and other conservation areas are identified for protection according to the following scenarios.</p> <ol style="list-style-type: none"> 1. A Unit of Certification, with existing plantations and no new land clearing (after November 2018) shall provide evidence of a Valid HCV assessment [Refer to new Annex 5]. 2. A Unit of Certification that followed the transitional measures for P&C 2018 [add reference to “Interpretation of indicator 7.12.2 and Annex 5”], shall provide evidence that a Valid HCV and/or Standalone HCSA assessment and/or Integrated HCV-HCS assessment (as applicable) was conducted before any new land clearing (refer to new Annex 5). 3. A Unit of Certification, with any new land clearing after 15 November 2018 shall provide evidence that: <ol style="list-style-type: none"> a. land clearing is preceded by an ALS Integrated HCV-HCS assessment, using the Integrated HCV-HCSA Assessment Manual valid at the time of the assessment (either the November 2017 or June 2023 version). b. has complied with the requirements of the NPP 2015 (and subsequent revisions). <p>7.7.2. (C) For all land clearing since November 2005, the Unit of Certification shall provide evidence of a historic Land Use Change Analysis (LUCA). Where there has been land clearing without prior HCV assessment since November 2005, or without a prior Integrated HCV-HCSA Assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p>
103	7.7.2	Biodiversity and biodiversity corridors should be mentioned. Enhancing biodiversity is critical to establish resilient plantations, even more so in future.
104	7.7.2	We agree with the proposed changes above from Ruth, and urge that these are incorporated. This includes the suggestion to add a new indicator relating to changing/adapting HCVs - this was a request from the BHCV Working Group as well following several discussions about this issue.
105	7.7.2	As stated by ZSL this was requested by the BHCVWG. Support text from HCVN member which is more adequate.

No	Criteria/Indicator	Comment
106	7.7.2	<p>Proposed text to: improve clarity and auditability; avoid splitting M&M of HCVs and their threats into several indicators (for example 7.7.5 in the draft is incorporated here). Some content relevant to the former 2018P&C indicator 7.12.5 (about involvement of affected communities in the M&M of HCVs and HCS forest) has been brought here as well. And a new indicator about "adapting" (to recognise "new HCVs" identified and in general changes in HCV condition and status) is suggested, integrated the elements in 7.12.4 related to "adapting " and updating.</p> <p>7.7.3. (C) Where HCVs and/or, HCS forests have been identified, the Unit of Certification shall develop and implement an integrated management and monitoring plan to protect and/or enhance HCVs and/or, HCS forests in the directly managed area. This plan shall make clear the roles of affected communities in the management and monitoring of these conservation areas and shall be developed in consultation with relevant stakeholders. This management and monitoring plan includes, but is not limited to the following, if applicable:</p> <ol style="list-style-type: none"> 1. All RTE species (HCV-1); 2. Management of human-wildlife conflict (threats to HCVs); 3. Other conservation areas; and 4. A programme to regularly socialise with the workforce the status of RTE species. <p>7.7.4. (c) The Unit of Certification shall Adapt, where necessary, the management and monitoring plan to protect and/or enhance HCVs and/or, HCS forests. This management plan shall be reviewed at least once every five years. The outcomes of the monitoring activities shall be used to update the management and monitoring plan. PROCEDURAL NOTE: RSPO shall develop a guidance on changes on HCV condition and status changing HCVs to support implementation of management and monitoring.</p>
107	7.7.3	Suggest to integrate R&CP into the proposed indicator 7.7.2 for historical land clearance.
108	7.7.3	Agreed with Ruth's suggestion - see our comments on 7.7.2. Also to reiterate our comment from last round of feedback - we are not clear on the rationale for including the procedural note on exceptional cases for the RaCP here - these are by definition exceptional cases and only treated as case-by-case, so should not be in the body of the indicator.
109	7.7.3	Agreed and support HCVN's comment.
110	7.7.4	<p>Propose focusing on the first part of the indicator, as the second (related to how the plans must be prepare, engaging affected communities) has been merged into the proposed indicator 7.7.3 .</p> <p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018 and other conservation areas, there is no diminishment of these rights without evidence of a negotiated agreement, obtained through FPIC.</p>
111	7.7.4	the indicator should be upgraded to C Critical
112	7.7.4	Agreed with suggestion from Ruth. Also, not clear why reference to other conservation areas has been removed - this should be reinstated.
113	7.7.4	Support HCVN comment and also have the same query as ZSL, please reinstate the reference, tq

No	Criteria/Indicator	Comment
114	7.7.5	We agree with HCVN's point above and strongly urge that the suggested wording from Ruth is used to replace the current indicators. It is unacceptable that the current version of this standard does not make explicit how HCVs and HCS should be identified, and does not reference the HCV-HCS integrated assessment methodology/HCV-HCSA manual within the indicator, as in the 2018 P&C. Removing reference to the methodology used seriously weakens the standard, and does not comply with the ISEAL Code of Good Practice (7.3) which states that "The scheme owner defines requirements and procedures for each type of assessment implemented within the assurance system". We have raised this as an issue in all our feedback so far, and it has been raised collectively by the BHCVWG, so it is frustrating to see it not yet incorporated. We will not accept a standard which does not clearly require an HCV-HCS assessment (or HCV pre-2018) before any land clearance, and which does not explicitly require the integrated HCV-HCSA methodology, as this would make it weaker than the 2018 P&C.
115	7.7.5	Wording is quite confusing. Does it mean if no RTE identified by HCV assessor, the UoC still must identify RTE?
116	7.7.5	See comments on 7.7.2 and in previous feedback regarding the introduction of an indicator re changes to HCVs over time, and adaptive management - this would be clearer re ensuring HCV1 species are protected when found, even if not identified in the original HCV assessment.
117	7.7.5	Support recommendation by HCVN and ZSL
118	7.7.5	I support the proposal to merge the first two sentences into 7.7.2, But the balance of the text could remain as a new indicator on ensuring active engagement of the workforce in protecting the RTE
119	7.7.5	Propose to remove it, because this indicator duplicates indicators related to M&M, possibly because the requirement to "adapt" the M&M plans when status or condition of HCVs (which would include listing newly identified RTE Species as HCV 1) was not explicit, and there is no RSPO procedure to do this. Hence, the proposed new indicator 7.7.4 includes now explicit reference to adapting /updating, so the Management plan covers also newly identified RTEs (which were not found in teh assessments) .
120	7.8	Glad to see the focus on large mammals only has been removed. However, it is still not clear how these indicators would be audited currently. More clarification and detailed input from experts on this topic would help to strengthen it. Would also need to clarify scope of what meant by 'human-wildlife conflict' - e.g. does poaching get included here? Does 'wildlife' only refer to fauna? Flora can be included as part of definition of wildlife too. Also need to clarify how this goes beyond protecting HCVs - if it is considered to be covered already by management and monitoring of HCVs, it should not be a separate indicator. If it goes beyond HCV requirements, this needs clarifying. If these points are still unclear, we suggest removing 7.8 from the current version of the P+C to avoid introducing something that can't be audited.
121	7.8	Agree and support ZSL comments.