

No	Criteria/Indicators	Comment
1	1.1 MS A	<p>...Smallholders and their representative... Suggest to change "and" to "or".</p> <p>The suggestion: Smallholders or their representative shall have undergone capacity building programme e.g. training(s) organised by group manager on farm business planning, operations and monitoring.</p>
2	1.1 MS B	<p>...Smallholders and their representative...Suggest to change "and" to "or".</p> <p>The suggestion: Smallholders or their representative shall have completed training(s) on relevant Best Management Practices (BMP) that includes good agricultural practices (GAP).</p>
3	2.3 E	<p>...and commit to resolve them... Suggest change to/either "consult with relevant authorities" or "refer the matter to appropriate officials".</p> <p>The suggestion: Smallholder shall declare existing disputes on land and resources, if any, and consult with relevant authorities.</p>
4	2.4 E	<p>Smallholders shall... Suggest to add "Smallholders with the support of group manager shall..."</p> <p>The suggestion: Smallholders with the support of group manager 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.</p>
5	2.5 E	<p>Smallholder commit to... Suggest change to "Smallholder with the support of Group Manager..."</p> <p>The suggestion: Smallholders with the support of group manager to identify Affected Communities, if any, and conduct simplified FPIC process on areas of new plantings.</p>
6	3.1 E	<p>To long for Eligibility phase, training element goes to Milestone A . suggest :</p> <p>Smallholders shall commit to not use forced labour. Smallholders shall comply with legal requirements prescribed by national/state/provincial regulations when hiring Workers</p>
7	3.2 E	<p>To long for Eligibility phase, training element goes to Milestone A . suggest : Smallholders shall commit to not use child labour in their plots. Smallholder shall address and end child labour on Smallholder plot from Eligibility stage, if any</p>
8	3.2 MS B	<p>A) must be under adult supervision... Suggest to change and add, "A) must be under an adult supervision, preferably their own immediate family member"</p> <p>The suggestion: A) must be under an adult supervision, preferably their own immediate family member.</p>

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9	4.1	There is no longer a clear step for identifying HCV and HCS, which there is in the 2019 standard. This jumps straight to management and protection but needs to start with identification - currently only mentioned in in the criterion but not at indicator level. Identification of HCVs and HCS forest is a crucial requirement. This feedback was also provided in the last round, and from the BHCV working group
10	4.1	We are 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.
11	4.1 MS B	The word 'maintain' has only been re-inserted here in relation to RTE species, but needs to be in reference to HCV and HCS as well. It is unacceptable to remove the requirement to maintain HCVs and HCS forest over time, and constitutes a serious weakening of the standard here. The requirement to maintain HCVs and HCS must be reinstated. This was a request from the BHCVWG in the last round of feedback as well.
12	4.3	See comments above - we are concerned that IS-LURI is not sufficient for identifying HCS
13	4.3 E	Smallholder shall commit... Suggest to change/add to "Smallholder and group manager shall commit..."  The suggestion: Smallholders <b>and group manager</b> shall commit to provide information on all planned new planting including no new planting on HCVs or HCS forests, on steep slopes (more than 25 degrees or as in the NI), on peat until HCVs, and/or HCS forest are identified, restricted areas or protected by national laws, or riparian reserves (reference to A1.2.E, Annex XXX)
14	4.4	Base on our experience, it's not that easy for smallholders to implement and follow the recommendation on the BMPs, especially an action plan for peat management involve the cost, etc.,  There is any Smallholder certified RSPO planted in peat area done and follow this BMPs for peat?
15	4.5 E	Smallholder shall commit... Suggest to change/add to "Smallholder with the support of group manager shall commit..."  Typing error:..Assesmmnt..  The suggestion: Smallholders <b>with the support of group manager</b> shall commit to providing information on all plans for replanting and commit that replanting will only be in areas with low risk of flooding or saline intrusion based on an approved flood risk assessment, in accordance with the latest version of RSPO ISH Flood Risk Assessment Template (reference A1.2.E, Annex XXX).
16	4.6 MS A	Suggest the list training were put at guidance level.
17	4.6 MSA	This means that after eligibility, the smallholder to Milestone A, "there is no physical evidence of using fire." However, in the RSPO standard-PC-Revision 2.0, some wording still uses "unless in exceptional circumstances,"
18	4.7 E	Follow previous version with little addition, BMP should put either Milestone in A or B. Suggest: Smallholders shall commit to no new planting in riparian reserves .Group Manager shall identify riparian reserves within the smallholder plot
19	4.8 E	Its suppose egilibility phase, why need to mention/Inclusion MSB? suggest to follow previous version E, MSA and MSB indicator.

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20	4.9 E	<p>Smallholders shall commit... Suggest to change/add to "Smallholders with the support of group manager shall commit..."</p> <p>The suggestion: Smallholders <b>with the support of group manager</b> shall commit to managing pests and diseases, weeds and invasive species, if any, using appropriate techniques, including Integrated Pest Management (IPM).</p>
21	A2.3 E	Please standardise the capital letter
22	A2.3 E	<p>The Group Manager shall establish and make accessible capacity building programme for all members... Suggest to add "...programme for all members or their representatives"</p> <p>The suggestion: The Group Manager shall establish and make accessible capacity building programme for all members or their representatives cover the following:</p>
23	A2.3 MS A	Please standardise the capital letter
24	A2.3 MS A	<p>The Group Manager shall implement capacity building programme based on phased approach for all members... Suggest to add "...programme for all members or their representatives..."</p> <p>The suggestion: The Group Manager shall implement capacity building programme based on phased approach for all members or their representative that covers the following;</p>
25	A2.3 MS B	Please standardise the capital letter
26	A2.3 MS B	<p>The Group Manager shall ensure all members have attended training... Suggest to add..."ensure all members or their representatives have attended..."</p> <p>The suggestion: The Group Manager shall ensure all members and their representatives have attended training and able to demonstrate understanding of the following:</p>
27	B1.1 MS A	MS A and B same word indicator? Suggest MS A is related to complete training
28	B1.1 MS B	MS A and B same word indicator? Suggest MS A is related to complete training