

Frequently Asked Questions on Mill List Submission

1. Can you share the details of Resolution GA15-6b?

Resolution GA15-6b was adopted at the 15th Annual General Assembly of RSPO members in 2018. Details of the resolution are available on RSPO's website or via this link: https://ga.rspo.org/ga15/Resolutions/ResolutionGA15-6b.pdf

2. The resolution requires the mill list to be updated every quarter, but the announcement stated biannually. Which is correct?

The change from quarterly to biannually was consistent with the requirements for primary procurement as defined in clause 5.4.5 of the RSPO Supply Chain Certification Standard 2020.

- 3. If I am a refinery (i.e. purchasing directly from the mill) and my company has already published the mill list on our website, do I still need to upload the list to MyRSPO? Yes. You can upload the URL link of the mill list to MyRSPO. The steps for uploading the link are provided in the guidance document HERE.
- 4. How does this relate to me as I am a trader/distributor/producer of oleochemical/product manufacturer/end product manufacturer/retailer not involved in primary procurement?

Resolution GA15-6b requires the same level of transparency from RSPO members who are not involved in primary procurement to make the list of their supplying mills (both RSPO certified and non-certified) publicly available.

THIS RESOLUTION PROPOSES:

- To adopt changes that would make it mandatory for RSPO member organizations involved in primary procurement (i.e. purchasing directly from a mill) to make public their entire third-party supplying mills list, including the supply from its own mills. Lists could be made public on company websites or via the RSPO audit process. The lists should include the name of the supplying mill, the name of the parent company who owns the mill and the mill GPS coordinates. Mill lists should be updated every quarter. The RSPO Secretariat should develop measures to ensure the accuracy of the list is verified by an accredited 3rd party auditor within 18 months of publication.
- 2) For the RSPO Secretariat to review and determine within one year from the date of this Resolution how a similar level of supply chain transparency can be promoted to incorporate RSPO members who are not involved in primary procurement



5. If our company mainly purchases raw materials (refined palm oil/palm kernel oil and emulsifiers products containing Palm Oil/Palm Kernel Oil) from traders or manufacturers, and none of our raw materials are delivered directly from a mill, do I need to declare the mill list?

Yes, companies who purchase raw materials (e.g. refined Palm Oil/Palm Kernel Oil and emulsifiers products containing Palm Oil/Palm Kernel Oil) directly or indirectly from the mills need to make their list of supplying mills publicly available as required by Resolution GA15-6b.

6. If our company produces fatty alcohol Segregated (SG) and fatty acid Mass Balance (MB), do I need to submit the mill list in MyRSPO?

Yes, your company needs to submit the list of supplying mills in MyRSPO regardless of the Supply Chain model (IP, SG, or MB).

- 7. If our kernel crushing plant receives certified palm kernel from an oil mill located less than 1 km away from our plant do we need to upload the list of supplying mills? Yes. Your company needs to submit the list of supplying mills in MyRSPO. Resolution GA15-6b does not set any minimum distance between the oil mill and the buyer. Therefore, you need to make the list of supplying mills publicly available. The steps for uploading the mill list to MyRSPO are provided in the guidance document HERE.
- 8. What should I do if my supplier is reluctant to provide the information about their supplying mill?

Since the resolution has been adopted during the 15th General Assembly, RSPO members need to comply with the requirements.

9. Is the mill list submission mandatory for every Supply Chain Associate?

Yes. Resolution GA15-6b requires the same level of transparency from Supply Chain Associates. Therefore, those who purchase/use/trade less than 500 metric tonnes (mt) of palm oil need to make their list of supplying mills publicly available.

10. If I only consume less than 1000kg of certified material annually, do I need to submit the mill list?

Yes. Resolution GA15-6b does not specify any minimum threshold of palm oil consumption. Therefore, you are required to submit the mill list.

11. Since I am a producer of oleochemical/product manufacturer/end product manufacturer/retailer, how do I know who is the mill that supplies the palm oil products to me?

You need to contact your supplier (who will get the information from their supplier in an exercise of transparency) and obtain the information about the mill's name, the country where the mill is located, the mill's GPS coordinates, and the name of the parent company who owns the mill.

12. If I would like to submit the mill list for the second half of 2020, when is the due date? The platform called 'Mill List' in MyRSPO is now open. Members can upload their mill list for the second half of 2020 through to 31 March 2021 at the latest. *Refer to Question no. 21



13. How do I know if I have successfully uploaded the mill list?

There will be a pop-up notification upon successful submission of either a URL or a file.

14. Can I update this mill list submission from time to time?

Yes, you can update this mill list from time to time, or at least every six months. The RSPO website will always display the last version that you have updated. The steps for updating the mill list is provided in the guidance document HERE.

15. I am a trader involved in primary procurement (i.e., purchasing directly from an oil mill) and my company holds the RSPO Trader license, do I still need to upload the mill list to MyRSPO?

Resolution GA15-6b requires RSPO members who are involved in primary procurement to make the list of their supplying mills (both RSPO certified and non-certified) publicly available. You can submit the list of supplying mills in MyRSPO and the guidance document can be downloaded HERE.

16. We are RSPO members and one of our subsidiary companies is a kernel crushing plant that does not hold any RSPO certification. The palm kernel is purchased directly from nearby mills. Please advise us on how to fulfil Resolution GA 15-6b?

Since you are an RSPO member, you need to fulfil Resolution GA15-6b where you are required to make the list of your supplying mills (both RSPO certified and non-certified) publicly available, regardless of your certification status. You can submit the list of supplying mills in MyRSPO.

17. I am a retailer and I have purchased RSPO certified products from a few Supply Chain certified traders and manufacturers. Can I use my suppliers' mill list as my mill list? Yes, you can use your suppliers' mill list as your list by combining the list from all your suppliers (traders and manufacturers) and upload the list in your organisation's MyRSPO account.

18. Is there any sanction if I do not submit a mill list?

As of now, there is no decision to impose any sanction on members who have not submitted their mill list. However, for SCC certified companies that buy directly from mills, a major nonconformity will be raised by the Certification Body if the implementation is not evident.

19. Could you please summarise who are the supply chain actors that should submit the mill list on MyRSPO?

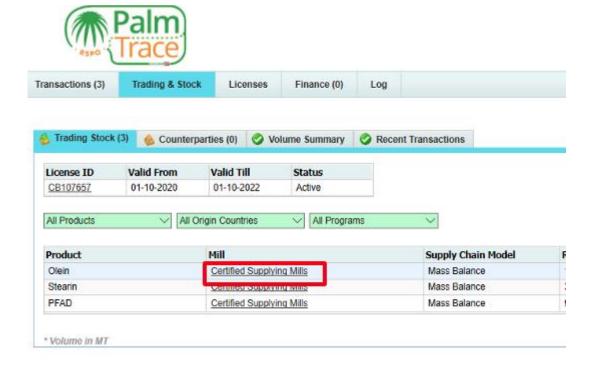
Supply Chain actors	Requirement for mill list submission
	The submission of the mill list is mandatory following the requirement 5.4.5 of the SCC Standard 2020.
	The submission of the mill list in MyRSPO shall be verified by the Certification Body(CB). A major non-conformity can be raised in case of non compliance of the requirement.



RSPO members involved in primary In accordance with Resolution GA15-6b (1), the procurement (i.e., purchasing submission of the mill list for all companies involved in primary procurement is mandatory. directly from a mill) not holding Supply Chain Certification. The RSPO Secretariat has added a functionality in MyRSPO for the members to upload their mill list. The verification method will be announced when ready. Other supply chain actors (i.e., not The submission of the mill list should follow the purchasing directly from a mill) requirements of promotion, commitment and holding or not holding Supply Chain implementation of the Code of Conduct of the Certification. RSPO members and Resolution GA15-6b. The RSPO Secretariat has added a functionality in MyRSPO for the members to upload their mill list. The verification method will be announced when ready.

20. Can we establish a mill list from PalmTrace?

For those SC actors who are required to register their transactions in PalmTrace (PT) (reference 5.7.1 of the SCC Standard 2020), PT offers an overview of the supplying mills by accessing the Member Area. Under the tab 'Trading & Stock' and 'Trading stock' you will find all of your products. By clicking on the specific product and 'Certified Supplying Mills' you can access all the mills that have potentially supplied you with that IP or SG or MB product.



Through this link, the following information about your Certified Supplying Mills is shown: Member Name, Member ID, City, Country, GPS (Latitude, Longitude), Last Purchase Date, Transaction ID. Please note that this information can be exported to Excel.



In addition, refineries can obtain a complete mill list via PalmTrace as per the association of 'Certified Supplying Mills' to the products in stock and the 'Conventional source declaration'. The conventional source declaration feature shows the conventional mills.

The final refinery can use the Trace function in PalmTrace when they sell RSPO certified products to other supply chain actors. Tracing triggers the generation of a Trace document with a unique traceability number and information about supplying mills. The trace document shall be passed on to the buyers.

As a consumer goods manufacturer, you shall ask your suppliers to pass on to you the mill list of its RSPO certified volumes and uncertified volumes. Your supplier shall ask its suppliers for the same.

21. We would like to submit the mill list for the second half of 2020 and our raw materials suppliers are in progress to update their mill list and according to them, the list will be completed by mid-May 2021. We are aware of the due date of mill list submission on 31 March 2021, could you please consider extending the due date?

Considering that it is the first time that companies need to establish a mill list and in view of the current pandemic situation, RSPO has agreed to extend the deadline to another three months i.e., 30 June 2021. However, there should not be any more extension for the first half of 2021 submission (i.e., 30 September 2021).

Prepared by: RSPO Secretariat, 12 August 2020

Updated on 31 March 2021