

## RSPO Thai National Interpretation Working Draft

### Summary of Amendments

The initial Thai National Interpretation working draft (developed prior to discussion meetings) is largely based on the generic document of the RSPO Principles and Criteria, but also includes indicators taken from the Malaysian and Indonesian National Interpretations that could apply to Thailand. The initial working draft also includes specific guidance for smallholders for each criteria, which is also largely based on indicators from the Malaysian or Indonesian National Interpretations.

The following is a summary of the *significant* amendments made the RSPO Thai National Interpretation Working Draft. These amendments were made during initial development of the draft, as well as during the 1<sup>st</sup> and 2<sup>nd</sup> RSPO Thai-NI Discussion Meetings held between experts from TUV Rheinland and local Thai department (list of meeting participants are included in appendix). Significant amendments include addition or replacements of indicators from the generic RSPO P&C document with applicable indicators from other national interpretation documents, references to specific Thai local regulations, or other major changes to text to suit Thai local conditions, based on input from relevant experts.

Text from the generic RSPO P&C document that was shortened or re-worded for clarity, but retains the same meaning as the original is not considered a significant amendment, and is therefore not included in this list. The specific national guidance for smallholders, while considered significant amendments as well, can be referred to directly in the working draft and therefore are not included in this list.

Date	Section	Amendment made	Justification	Suggested by
17.08.09	Preamble	<i>Refer to preamble in working draft</i>	The preamble is an introduction to the working draft and also includes a definition of different types of smallholders. This is not a fixed definition and can be redefined by the NI working group.	Carol and Artit
17.08.09	Guidance for CR2.1	<b>Amended:</b> Key international laws and conventions are set out in Appendix 1. <b>New version:</b> Key international laws and conventions are set out in Appendix 1, while Thai legal regulations are listed in Appendix 2.	To ensure the guidance refers to both international and local legal requirements.	Artit
03.08.09	CR2.2	<b>Added:</b> IN 2.2.4 - Evidence that land boundaries are marked with boundary stones or other forms of demarcation in accordance to land ownership permits, and these are visibly maintained. Maps of legal boundaries are also maintained.	Land owners should clearly demarcate their land boundaries as an indicator to surrounding communities. There are several different types of land ownership, and certain types require marking of boundary stones, while others do not. Therefore this requirement should be met in accordance with the type of land ownership permit owned.	Based on discussion with Thai land law experts
17.08.09	Guidance for CR2.2	<b>Added:</b> Requirements for demarcation of land boundaries may differ according to the land ownership permit owned by the grower. Growers should comply to the terms for land boundary demarcation as defined in their land ownership permit.	This guidance is to explain further the requirement for 2.2.4	Carol and Artit

Date	Section	Amendment made	Justification	Suggested by
17.08.09	CR4.2	<p><b>Amended:</b> Records of fertilizer inputs are maintained.</p> <p><b>New version:</b> Records of fertilizer inputs are maintained (eg. Type of fertilizer used, area applied, amount applied and dates of application)</p>	Examples are included to clarify on what types of records should be expected.	Artit
03.08.09	CR4.2	<p><b>Deleted:</b> IN 4.2.2 - Evidence of periodic tissue and soil sampling to monitor changes in nutrient status.</p> <p><b>Replaced with:</b> IN 4.2.2 - Records of soil sampling conducted at least once, and periodic leaf sampling and visual analysis to monitor changes in nutrient status.</p>	Soil sampling is not usually carried out periodically, but done only prior to planting. Visual analysis should also be carried out.	Based on discussion with Thai experts
Before 13.07.09	CR4.2	<p><b>Deleted:</b> A nutrient recycling strategy should be in place.</p> <p><b>Replaced with:</b> IN 4.2.3 - Records of efforts to maintain and increase soil fertility (e.g. the use of fertilizer, legume cover crops, compost, and land applications of POME or EFB) based on the results of analysis carried out as in IN 4.2.2).</p>	The nutrient recycling strategy should be more specifically defined.	Carol
20.8.09	CR4.3	<p><b>Amended:</b> A management strategy should exist for plantings on slopes above a certain limit (needs to be soil and climate specific).</p> <p><b>New version:</b> A management strategy should exist for plantings on slopes above a certain limit as defined by the plantation owner (needs to be soil and climate specific).</p>	The sentence “as defined by the plantation owner” is included because there is no regulation in Thailand specifying maximum slope allowed for plantings, therefore this should be defined by the plantation management as part of their management strategy.	Carol
Before 13.07.09	CR4.3	<b>Added:</b> IN 4.3.6 - Avoid or minimize bare or exposed soil within estates.	Bare or exposed soil should be avoided to reduce erosion of soils.	Carol
13.07.09	CR4.4	<p><b>Deleted:</b> Monitoring of effluent BOD.</p> <p><b>Replaced with:</b> IN 4.4.2 -Outgoing water into main natural waterways shall be monitored at a frequency that reflects the estates and mills current activities which may have negative impacts. This should include monitoring of levels of BOD, COD, SS, pH and Oil &amp; Grease.</p>	BOD, COD, SS, pH and Oil & Grease levels of water from estates and mills entering waterways should be analyzed to ensure they do not exceed legal limits and pollute waterways.	Somkid & Chatchai
02.08.09	Guidance for CR4.4	<b>Added:</b> Mills should implement techniques to recycle wastewater produced. However, for any water discharged from the mill into natural waterways, water sampling and analysis shall be conducted and analysis results should comply with the wastewater standards as defined in the Notification on the Standard on	This is a local requirement for wastewater sampling and analysis.	Somkid

Date	Section	Amendment made	Justification	Suggested by
Before 13.07.09	CR4.5	<p><b>Amended:</b> Monitoring of pesticide toxicity units (a.i./LD 50 per tonne of FFB or per hectare).</p> <p><b>New version:</b> IN 4.5.3 - Monitoring of pesticide toxicity units per hectare or per rai (active ingredient per hectare or per rai).</p>	Units of measurement of pesticide toxicity units amended because calculation of LD50 per tonne FFB or per hectare is not commonly done. Also, rai is the common measurement of land area used in Thailand, as opposed to hectare.	Carol
Before 13.07.09	CR4.6	<p><b>Deleted:</b> Justification of all agrochemical use.</p> <p><b>Replaced with:</b> IN 4.6.1 - Written justification in Standard Operating Procedures (SOP) of all agrochemicals use.</p>	Justification of usage of agrochemicals should be defined in the SOP.	Carol
13.07.09	CR4.6	<p><b>Deleted:</b> Use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species should be used where available. However, measures to avoid the development of resistance (such as pesticide rotations) are applied.</p> <p><b>Replaced with:</b> IN 4.6.3 - Pesticides selected for use are those officially registered under the Hazardous Substances Act (2001).</p>	Appropriate use of pesticides would have already been defined for Thai local conditions under the Hazardous Substances Act	Somkid
13.07.09	CR4.6	<p><b>Deleted:</b> Storage of all chemicals as prescribed in FAO or GIFAP Code of Practice (see Annex 1). All chemical containers must be properly disposed of and not used for other purposes (see criterion 5.3).</p> <p><b>Replaced with:</b> IN4.6.6 - Safe and appropriate storage and labeling of all chemicals as defined in the Manual for Storage of Chemicals and Hazardous Substances 2007 (Factories Department) and related requirements.</p>	Safe storage of chemicals is already defined in the Manual for Storage of Chemicals and Hazardous Substances 2007 (Factories Department).	Somkid
02.08.09	CR4.6	<p><b>Deleted:</b> Specific annual medical surveillance for pesticide operators, and documented action to eliminate adverse effects.</p> <p><b>Replaced with:</b> IN 4.6.8 - Medical check up for new pesticide operators and specific annual medical surveillance for pesticide operators, and documented action to eliminate</p>	<p>Medical checkup for new pesticide operators is a requirement under the Notification of Safety at Work in connection with Hazardous Chemical from the Interior Ministry (B.E. 2534)</p> <p>(กำหนดหลักเกณฑ์และวิธีการตรวจสอบสุขภาพของลูกจ้าง และสิ่งผลการตรวจแก้พนักงานตรวจแรงงาน พ.ศ. ๒๕๔๗ )</p>	Somkid

Date	Section	Amendment made	Justification	Suggested by
		adverse effects.		
02.08.09	CR4.6	<b>Added:</b> IN 4.6.9 - Provision of washing facilities for pesticide operators and equipment used in hazardous chemical applications.	This is a requirement as per the Notification of Safety at Work in connection with Hazardous Chemical from the Interior Ministry (B.E. 2534).	Somkid
02.08.09	CR4.6	<b>Added:</b> IN 4.6.11 - Material Safety Data Sheets (MSDS) of hazardous chemicals are available.	This is a requirement as per the Notification of Safety at Work in connection with Hazardous Chemical from the Interior Ministry (B.E. 2534).	Somkid
02.08.09	Guidance for CR4.6	<b>Added:</b> Growers shall implement practices pertaining to the use of chemicals, provision of PPE and washing facilities to workers, records maintained and training of pesticide operators in accordance with the requirements of the Notification of Safety at Work in connection with Environmental Conditions (Chemical Substances) from the Interior Ministry, or the Notification of Safety at Work in connection with Hazardous Chemical from the Interior Ministry (B.E. 2534). (กำหนดหลักเกณฑ์และวิธีการตรวจสอบสภาพองลูกจ้างและส่งผลการตรวจแก่พนักงานตรวจแรงงาน พ.ศ. ๒๕๔๓). Washing facilities for pesticide operators and equipment used in hazardous chemical applications should include wash basins, eye washer, and bathing area. The medical check up and surveillance of pesticide operator should be conducted by a registered doctor of Occupational Medicine.	Guidance explains further on the legal requirements pertaining to indicators in CR4.6.	Somkid
02.08.09	CR4.7	<b>Amended:</b> All operations have been risk assessed and documented. <b>New version:</b> IN 4.7.2 - All operations have been risk assessed and documented, and a documented procedure to control the hazards has been established.	A procedure to control hazards identified in the risk assessment should be prepared.	Somkid
02.08.09	CR4.7	<b>Added:</b> IN 4.7.10 - Appropriate fire-fighting equipment shall be made available.  IN 4.7.11 - Records that training in basic fire fighting is provided to at least 40 percent of employees.  IN 4.7.12 - Safe and appropriate storage of flammable chemicals.	These are requirements for fire safety as defined in the Notification on Safety at Work Related to Fire Prevention in the Workplace in Regard to Employee's Safety (เรื่อง การป้องกันและระงับอัคคีภัย ในสถานประกอบการเพื่อความปลอดภัยในการทำงาน สำหรับลูกจ้าง) from the Interior Ministry.	Somkid

Date	Section	Amendment made	Justification	Suggested by
02.08.09	Guidance for CR4.7	<p><b>Added:</b> Growers should implement safe work practices pertaining to fire safety in accordance with the Notification on Safety at Work Related to Fire Prevention in the Workplace in Regard to Employee's Safety (เรื่อง การป้องกันและระงับอัคคีภัย ในสถานประกอบการเพื่อความปลอดภัยในก ารทำงาน สำหรับลูกจ้าง) from the Interior Ministry. In addition to the requirements mentioned in IN 4.7.10 to IN 4.7.12, fire safety should also cover the following aspects:</p> <ul style="list-style-type: none"> <li>▪ Annual testing of fire emergency response plan</li> <li>▪ Maintenance of fire-safety equipment conducted at least once every 6 months</li> <li>▪ Fire alarm is available and maintained monthly</li> <li>▪ Fire exits are available</li> </ul>	This is to explain further the fire safety requirements for Thailand.	Somkid
02.08.09	CR4.7	<p><b>Added:</b> IN 4.7.15 - Appropriate medical personnel (doctors or nurses) should be available.</p>	This is a requirement of the Labour Ministry.	Somkid
02.08.09	CR4.7	<p><b>Amended:</b> Workers should be covered by accident insurance.</p> <p><b>New version:</b> IN 4.7.16 - Workers shall be covered by accident insurance and social insurance as required under the Workmen Compensation Fund Act (พ.ร.บ.เงินทดแทน).</p>	The requirements for insuring workers are as defined in the Workmen Compensation Fund Act (พ.ร.บ.เงินทดแทน).	Somkid
Before 13.07.09	CR4.8	<p><b>Amended:</b></p> <ul style="list-style-type: none"> <li>• A formal training programme that includes regular assessment of training needs and documentation of the programme.</li> <li>• Records of training for each employee are kept.</li> </ul> <p><b>New version:</b> IN 4.8.1 - A formal training programme that includes regular assessment of training needs, documentation of the programme and records of training for each employee, including contractors, are kept.</p>	Two indicators combined into one. Trainings should be conducted for contractors as well as internal workers, and records of this should be maintained.	Carol
07.08.09	CR5.1	<p><b>Deleted:</b> Documented impact assessment.</p> <p><b>Replaced with:</b> IN 5.1.1 - Environmental Impact Assessment (EIA), including evidence of stakeholder participation, conducted by mills or estates required to conduct EIA under The Enhancement and Conservation of National Environmental Quality Act (NEQA)</p>	Certain mills and estates (but not all) may be required to conduct EIA as a requirement of the Enhancement and Conservation of National Environmental Quality Act (NEQA) 1992. If mills and estates are not required to do so, this indicator is not applicable.	Somkid

Date	Section	Amendment made	Justification	Suggested by
		1992.		
07.08.09	CR5.1	<b>Added:</b> IN 5.1.2 - Documented environmental aspects and impacts risk assessment that is periodically reviewed and updated	This is an informal environmental aspects and impacts risk assessment (similar to ISO14001) format that should be done by all estates and mill, but is not a legal requirement.	Carol
Before 13.07.09	CR5.1	<b>Deleted:</b> Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change should be developed.  <b>Replaced with:</b> IN 5.1.3 - Environmental improvement plan to mitigate the negative impacts and promote the positive ones, is developed, implemented and monitored.	Reworded for clarity.	Carol
07.08.09	Guidance for CR5.1	<b>Added:</b> The Enhancement and Conservation of National Environmental Quality Act (NEQA) 1992 from the Ministry of Science Technology and Energy includes Notification 2535, which prescribes Types and Sizes of Projects or Activities of Government Agencies, State Enterprises or Private Persons Required to Prepare an Environmental Impact Assessment Report (เรื่อง กำหนดประเภทและขนาดของโครงการหรือกิจการของส่วนราชการ รัฐวิสาหกิจ หรือเอกชนที่ต้องจัดทำรายงานการวิเคราะห์ผลกระทบสิ่งแวดล้อม). The notification lists 29 types of projects required to conduct EIA in Thailand, which include irrigation, coastal reclamation, building in areas adjacent to rivers, lakes or beaches or in the vicinity of National Park or Historical Park, and all types of projects located at watershed areas. Growers and millers should have evidence of having checked with relevant authorities if their estate or mill is listed as one of these 29 projects, and if so, the EIA for their location has been conducted as required. Stakeholder participation is required in conducting the EIA. The EIA may only be performed a person or entity with the jurisdiction to do so as approved by Office of Natural Resources and Environmental Policy and Planning นิติบุคคลที่ได้รับอนุญาตจากสำนักนโยบายและแผนทรัพยากรธรรมชาติและสิ่งแวดล้อม (สนพ.)	This guidance is to explain further on the requirements of the Enhancement and Conservation of National Environmental Quality Act (NEQA) 1992.	Somkid, Artit and Carol

Date	Section	Amendment made	Justification	Suggested by
13.07.09	Guidance for CR5.2	<b>Added:</b> Efforts to protect ERTs should be in accordance with the requirements of the Wildlife Reservation and Protection Act BE. 2535 (1992). The Wildlife Reservations and Protection Act lists 15 endangered, rare or threatened species of animals for which hunting, breeding, possessing or trading is prohibited except when done for scientific research with permission from the Permanent Secretary of National Park, Wildlife and Plant Conservation. These animals include the White-Eye River Martin, Javan Rhinoceros, Sumatran Rhinoceros, Kouprey, Wild Water Buffalo, Eld's Deer, Schomburgrk's Deer, Serow, Goral, Gurney's Pitta, Sarus Crane, Marbled Cat, Malayan Tapir , Fea's Barking Deer and the Dugong.	This is included in guidance since these acts already specify regulations to protect ERTs.	Chatchai and Carol
Before 13.07.09	CR5.3	<b>Amended:</b> Safe disposal of pesticide containers. <b>New version:</b> IN 5.3.3 - Safe disposal of pesticide containers and other scheduled waste through licensed contractors.	All scheduled wastes should be collected by a licensed contractor to ensure these are disposed of safely.	Carol
02.08.09	CR5.3	<b>Added:</b> IN 5.3.4 – Mill has obtained approval for waste disposal from the Factories Department, and implements methods of waste disposal in accordance with the approval received.	This is a requirement of the Factories Department, as defined in the notification from the Industrial Ministry (เรื่อง การกำจัดสิ่งปฏิกูลหรือวัสดุที่ไม่ใช่แล้ว พ.ศ. ๒๕๔๘).	Somkid
02.08.09	CR5.3	<b>Added:</b> IN 5.3.5 - Mill maintains records of annual waste report, and report of any wastes kept more than 3 months, with evidence of submission to the Factories Department.	This is a requirement of the Factories Department.	Somkid
Before 13.07.09	CR5.3	<b>Added:</b> IN 5.3.6 - Evidence that crop residues / biomass are used, either for energy production at the mill or application at fields (Cross ref. C 4.2).	Reusing crop residues or biomass reduces a lot of waste and is an integral part of good waste management at palm oil plantations.	Carol
13.07.09	CR5.3	<b>Added:</b> IN 5.3.7 - Evidence that wastewater produced from the mill is recycled.	Recycling of wastewater is an integral part of waste management at the mill.	Artit
20.08.09	Guidance for CR5.3	<b>Added:</b> Mills should comply to regulations for disposal of waste from factories as defined in the notification from the Industrial Ministry (เรื่อง การกำจัดสิ่งปฏิกูลหรือวัสดุที่ไม่ใช่แล้ว พ.ศ. ๒๕๔๘).	This is the legal requirements for waste disposal.	Somkid

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13.07.09	CR5.4	<b>Added:</b> IN 5.4.3 - A plan to improve efficiency of energy use at the mill.	As IN 5.3.1 and 5.3.2 requires energy usage to be monitored, it should also be necessary develop a plan to improve energy efficiency based on monitoring results.	Artit and Somkid
13.07.09	CR5.5	<b>Added:</b> IN 5.5.2 - Use of fire on peat soils is avoided.	Burning peat causes high levels of pollution due to release of large amounts of greenhouse gases, therefore use of fire on peat soils should be avoided.	Chatchai and Carol
02.08.09	CR5.6	<b>Deleted:</b> A monitoring system must be in place for these significant pollutants which goes beyond national compliance. <b>Replaced with:</b> IN 5.6.2 - Mill conducts monitoring and analysis of pollution and emission quality of the sources identified, which includes monitoring of levels of TSP, SO <sub>2</sub> , and NO <sub>x</sub> in air emissions.	Monitoring of levels of TSP, SO <sub>2</sub> , and NO <sub>x</sub> in air emissions is a requirement in the notification from the Industrial Ministry (เรื่อง กำหนดค่าปริมาณของสารเจือปนในอากาศ ที่ระบายออกจากโรงงาน พ.ศ. ๒๕๔๙).	Somkid
13.07.09	CR5.6	<b>Added:</b> IN 5.6.4 - Standard operating procedures to maintain and control production of pollutants at the mill.	Workers should be aware and trained on SOP for controlling production of emissions at the mill, or else documented pollution reduction plans will not bring results.	Artit
02.08.09	CR5.6	<b>Added:</b> Monitoring and analysis of pollution and emissions sources conducted by the mill should be conducted in accordance with the notification from the Industrial Ministry (เรื่อง กำหนดค่าปริมาณของสารเจือปนในอากาศ ที่ระบายออกจากโรงงาน พ.ศ. ๒๕๔๙).	This is a legal requirement.	Somkid
Before 13.07.09	CR 6.1	<b>Deleted:</b> A timetable with responsibilities for mitigation and monitoring, reviewed and updated as necessary, in those cases where the assessment has concluded that changes should be made to current practices. <b>Replaced with:</b> IN 6.1.2 - A management plan to mitigate negative social impacts is promote positive impacts is available, reviewed and updated as necessary.	A management plan should be more detailed than a timetable, and should include plans for how to mitigate the negative impacts as well as promote positive ones.	Carol
Before 27.07.09	CR 6.1	<b>Deleted:</b> Particular attention paid to the impacts of outgrower schemes (where the plantation includes such a scheme). <b>Replaced with:</b> IN 6.1.3 - Where the mill has scheme smallholders or outgrowers, particular attention is paid to the social impacts of these parties.	The social impact assessment should also consider social impacts created by the scheme smallholders, as these are also required to be RSPO certified within 3 years of certification of the mill.	Carol & Dian



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03.08.09	Guidance for CR6.5	<b>Added:</b> Growers and millers should comply to the requirements of the Labour Protection Act 1998, and ensure that hired contractors also comply to this legal requirement.	The Labour Protection Act 1998 defines the local requirement for workers welfare, and growers must ensure they only hire contractors that comply to this legal requirement.	Thai welfare expert, and Artit
13.07.09	CR6.7	<b>Amended:</b> Documentary evidence that minimum age requirement is met. <b>New version:</b> Documentary evidence that the minimum age requirement of 15 years old is met.	The minimum age requirement for workers in Thailand is 15 years old.	Somkid
13.07.09	CR6.7	<b>Added:</b> IN 6.7.2 - Records of report on employees aged between 15 to 18 years old which are sent to Labour Department are available as required by the Labour Protection Act 1998 and Child Protection Act 2003.	This is requirement from the local Labour Department.	Somkid and Thai social expert
13.07.09	Guidance for CR6.7	<b>Amended:</b> Growers and millers should clearly define the minimum working age, together with working hours. <b>New version:</b> Growers and millers should clearly define the minimum working age, together with working hours, and this should be integrated in the company's policy. Only workers who are at least 15 years old may be employed, with the stated exception of family farms. Where workers between the age of 15 to 18 years old are employed, the company shall make a report to the Labour Department or relevant authorities as required by law.	Growers should define the minimum age requirement in their company policy for awareness of all employees. The rest of the added guidance is to further explains on IN 6.7.1 and IN 6.7.2	Somkid and Artit
27.07.09	CR6.9	<b>Amended:</b> A specific grievance mechanism is established. <b>New version:</b> IN 6.9.2 - A specific grievance mechanism is established and made accessible to all workers, including contractors	Female issues of contracted female workers are also part of the responsibility of the oil palm grower, and so the grievance mechanism must be made available to them as well.	Dian
13.07.09	CR6.9	<b>Added:</b> IN 6.9.3 - A nominated representative or gender committee to address issues concerning workers is available.	This is in line with IN 6.92 which requires that a specific grievance mechanism be established. Having a representative or gender committee for women's issue should be an integral part of this grievance mechanism.	Chatchai and Carol
03.08.09	Guidance for CR6.9	<b>Added:</b> However, cases of discrimination against males may also occur, and these issues should also be taken into consideration.	It was brought up during the meeting with Thai experts that gender discrimination not only affects females but occasionally males as well.	Thai experts
27.07.09	CR7.1	<b>Deleted:</b> Where the development	The social impact assessment	Carol

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		<p>includes an outgrower scheme, the impacts of the scheme and the implications of the way it is managed should be given particular attention.</p> <p><b>Replaced with:</b> IN 7.1.3 - The social and environmental impact assessment shall also consider impacts of outgrower and smallholder schemes, if applicable.</p>	<p>should also consider social impacts created by the scheme smallholders, as these are also required to be RSPO certified within 3 years of certification of the mill.</p>	
27.07.09	Guidance for CR7.1	<p><b>Added:</b> For mills or estates required to conduct an EIA under the Enhancement and Conservation of National Environmental Quality Act (NEQA) 1992, this EIA may be integrated into social and environmental impact assessment required under indicator 7.1.1. See also criteria 5.1 and 6.1.</p> <p>The SEIA may be carried out internally or by independent experts with the necessary competency and expertise to conduct the assessment. Evidence of competency shall be maintained.</p>	<p>Please refer to criteria 5.1.</p> <p>It is not a legal requirement to conduct a SEIA prior to new plantings, however, as this is a requirement of RSPO, the SEIA may be carried out internally by a competent expert, and not necessarily by an external expert as this would incur high costs.</p>	Dian and Carol
17.08.09	CR7.2	<p><b>Added:</b> IN 7.2.3 - Results of soil surveys and topographic information are incorporated into operational plans for establishments of new plantings.</p>	<p>This should be part of the requirement for CR7.2, since it already requires soil survey and topographic information to be made available.</p>	Artit
03.08.09	Guidance for CR7.4	<p><b>Added:</b> Fragile or marjinal soils in this case mainly includes steep slopes, sandy soils, and peat soils.</p>	<p>During discussion with Thai experts, the meaning of marjinal soils was not clear. This guidance is included to define the meaning of marjinal soils.</p>	Carol
27.07.09	CR7.5	<p><b>Added:</b> IN 7.5.2 - Documented programs or meetings with local communities and other stakeholders to socialize plans for new plantings and obtain and stakeholder feedback.</p> <p>IN 7.5.3 - Documented proof of transfer of rights and non-coerced agreement from affected local communities, where customary land has been acquired.</p> <p>IN 7.5.4 - Maps showing areas of relinquished rights.</p>	<p>These are not based on local requirements, but because indicators are not clearly defined for CR7.5 in the generic RSPO P&amp;C document, this is a suggestion for suitable indicators for criterion 7.5.</p>	Carol
13.07.09	CR7.7	<p><b>Deleted:</b> No evidence of land preparation by burning</p>	<p>This indicator was deleted because land clearing by burning is not prohibited, and IN7.7.2 states controlled burning is permitted if there is evidence of approval from relevant authorities.</p>	Somkid & Chatchai
13.07.09	CR7.7	<p><b>Added:</b> IN 7.7.3 - Records of trainings on the use of fire and control measures used to prevent spread of fire.</p>	<p>This should a requirement to ensure risks of fire spreading are reduced.</p>	Somkid

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13.07.09	CR8.1	<b>Added (In indicator 8.1.1):</b> Occupational Safety & Health (CR 4.7)	Continuous improvement plans for occupational safety and health should also be prepared.	Somkid.
13.07.09	Definitions	<b>Added:</b> Rai: The measurement unit of area commonly used in Thailand, which is equivalent to 1600 square metres (40m x 40m). One hectare is also equivalent to 6.25 rai.	Definition for rai is included as this is commonly used in Thailand	Carol & Artit