RSPO nonconformity analysis

A comparative analysis of P&C nonconformities raised by ASI-accredited RSPO Certification Bodies from 2015 to 2018, supplemented with selected results from ASI assessments from 2016 to 2019

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About ASI

ASI – Assurance Services International – is an assurance partner for leading voluntary sustainability standards and initiatives. ASI offers third-party accreditation for voluntary certification schemes – in short, “auditing the auditors.” We also design and oversee bespoke alternative assurance models to increase effectiveness and manage oversight in our clients’ systems.

We are a team of more than 70 sustainability professionals with diverse backgrounds and expertise. We have our headquarters in Bonn, Germany, an office in Kuala Lumpur, Malaysia and colleagues based on every continent.

With our global presence, the ASI team works together to achieve our mission: We are the world’s choice when confidence in claims is needed.

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List of abbreviations

ASI: Assurance Services International

CB: Certification Body

LA: lead auditor

NC: Nonconformity

NPP: new planting procedure

P&Cs: Principles and Criteria

RSPO: Roundtable on Sustainable Palm Oil

Summary

RSPO certification takes place after palm oil plantations reach the production stage. Since 2014, certification bodies (CBs) have been required to evaluate against approximately 138 indicators included in the 2013 version of RSPO Principles & Criteria (P&Cs). In 2018, CBs conducted over 300 audits at RSPO-certified plantations, and identified an average of around six nonconformities (NCs) at each audit.

The number of NCs raised by CBs shows considerable variations across certified units, over time, across CBs and across CB auditors. Around two thirds of NCs were graded major, requiring the NCs to be addressed within three months of the applicable audit date. The P&Cs under Principle 4, *Use of appropriate best practices by growers and millers,* make up the largest category of NCs identified by CBs. At the criteria level, the most common NCs raised by CBs are for health & safety (P&C 4.8), pesticide use (4.7), legality (2.1), waste (5.3) and worker benefits (6.5).

ASI performs approximately 20 onsite assessments at RSPO-certified plantations every year. Recent data shows that, when ASI observes CBs conduct their audits onsite (witness assessment), CBs raise twice the number of NCs, as compared to audits when ASI is not present. In addition, ASI assessments identify another four NCs, on average, that were not detected by CB audits.

The undetected NCs cover a range of P&C indicators, with around two thirds relating to worker benefits and conditions. At the criteria level, the most common are worker pay & conditions (6.5), legality (2.1), health & safety (4.7) and various worker-related P&Cs (e.g., 4.1, 4.8, 6.3, 6.6, 6.8, 6.9, 6.12, 6.13). For treatment of local communities, social impact assessments (6.1), grievances (6.3) and FPIC are cited (2.2 & 2.3). For environmental aspects, the most common undetected NCs are for HCV areas (5.2), waste (5.3) and soil practices (4.2).

ASI's assessments are targeted based on coverage, risk, and thematic considerations, which change over time and include incidents identified from RSPO and stakeholder complaints. In addition, ASI is seeking to address systemic issues by actively engaging with RSPO on social auditing requirements (e.g., auditor training) and identifying other areas where improvements can be made to the certification system.

The analysis and conclusions presented in this report are indicative but not conclusive. In particular, it should be noted that the data is incomplete because ASI did not have access to data available in RSPO's internal systems. Further, the data is generated from audits of production-stage plantations only, as the current certification system does not apply during the plantation establishment stage.

Introduction

This report provides an update of the data studies performed by ASI in 2017 and 2018 RSPO-certified mills and their supply base are audited annually against the RSPO Principles and Criteria (P&C) by an accredited third-party Certification Body (CB). Accreditation of CBs providing RSPO P&C certification has been performed by ASI since 2014.

The RSPO P&Cs list specific pieces of objective evidence that must be in place to demonstrate or verify that the P&Cs are being met. The 2013 version of the P&Cs lists a minimum of 138 P&C indicators (with some National Interpretations adding to that number). Any deviations against the P&C indicators that are identified by CBs during their on-site audits at plantations are reported by the CBs as nonconformities (NCs). Each NC is classified as either minor or major, depending on (i) the grade mandated in the applicable P&C indicator, and (ii) since July 2018: whether the NC is a repeat occurrence, in which case it is graded major in certain instances. NCs have to be rectified by the certificate holder within prescribed timeframes; these are a maximum of three months for major NCs and maximum twelve months for minor NCs.

Currently, the RSPO certification system only applies to plantations that have commenced production of palm oil and have obtained certification. The production stage occurs many years after plantation establishment. NCs raised against the RSPO P&C indicators that apply at the production stage are seen as central agents for change – driving improvement and upholding accountability of certified and operational palm oil plantations. However, the RSPO system does not report NCs that might exist at earlier stages of plantation life cycle. The NCs that are described in this report therefore comprise only those that are identified after reaching the production stage and when the management unit has achieved and maintained certification.

As at the date of this report, ASI has accredited 14 CBs for conducting P&C certification audits, and these CBs perform over 300 audits per year.

Sampling

RSPO is a voluntary certification scheme, and the costs of certification and accreditation are ultimately passed on to palm oil users. In order to encourage uptake of the scheme it is necessary to limit certification and accreditation costs, and the primary method of doing so is to apply audit sampling. For example, CBs visits to plantations typically occur within one week each year (on three to five specified days, with no unannounced audits), and might involve a dozen or so worker interviews (out of several hundred workers present at a plantation) and a handful of interviews with local community members. Under the current RSPO accreditation requirements, a surveillance audit of a plantation comprising five estates only requires the CB to visit two estates. Sampling also applies to ASI's onsite accreditation assessments, which number around 20 onsite visits a year (i.e., around 7% of the approximately 300 CB plantation audits that are conducted every year).

One of the initial primary objectives for initiating this data study was to inform and assist ASI in targeting its assessment sampling at certified palm oil plantations.

Methodology and limitations

The registry of RSPO-certified units is maintained by RSPO in the PalmTrace database and includes all current and past audit reports submitted by CBs, as well as

certificates, transaction volumes and supplemental schedules. However, ASI does not have access to the RSPO PalmTrace database. In order to perform this study, ASI therefore constructed a parallel database from a subset of public summary audit reports that was published by RSPO on the RSPO public webpage, supplemented with ad hoc email requests from ASI to CBs. However this method is highly inefficient and the resultant ASI database is incomplete. For 2018, it is estimated that the ASI database on which data study is based comprises around 80% of the total RSPO audit reports. Given these limitations, it is unlikely that ASI will continue this study in this format in future years, unless ASI has direct access to the full RSPO database.

After the ASI parallel database of CB audit reports was compiled, the data study involved manually extracting information from the audit reports. Manual extraction was necessary because each CB uses different templates and presents information in different ways. The following information was extracted:

- **General information** on the certificate holder: name, location;
- **Audits:** dates, type (initial/surveillance/recertification);
- **Audit team:** name of the auditors and their role if available;
- **Nonconformities:** indicators, grading.

The information was recorded in an Excel spreadsheet. After this year's updates, this spreadsheet now includes the majority of RSPO P&C audits conducted between 2015 and 2018, totaling around 1,300 RSPO P&C onsite audits and listing around 8,000 NCs raised by CBs at these audits. Audit reports cover certificate holders located in 16 countries.

Supplemental data on ASI NCs

For this year's data study report, the analysis of NCs raised by CBs is supplemented by a further data study of NCs identified by ASI at 78 ASI onsite assessments at palm plantations from 2016 to mid-2019.

The key distinction between the NCs raised by CBs and the NCs raised by ASI are that NCs raised by CBs are raised against the P&Cs (i.e., the RSPO certification requirements) and are issued to the RSPO-certified management unit, whereas the NCs raised by ASI are raised against the RSPO accreditation requirements and are issued to the CB. RSPO's accreditation requirements are set out in a document "RSPO P&C Certification Systems 2017" and are presented in a format that is entirely different to the P&Cs. However, since 2016, ASI's assessment reports that are issued to CBs have typically listed the relevant P&C (certification) indicators in a consistent format, which has allowed an analysis to be conducted that provides insight into whether there is also a potential nonconformity at the RSPO certified unit.

All ASI reports of onsite assessments at palm oil plantations (including the 78 reports described above) are publicly available on the ASI website.

ASI's onsite surveillance assessments at RSPO-certified units comprise two types: (i) At ASI witness assessments, ASI observes a CB auditor conduct their audit, and (ii) At ASI compliance assessments, an ASI assessor conducts their own audit of the RSPO-certified unit, by evaluating against a targeted subset of P&C indicators. The sub-set of P&Cs will take into account ASI's current assessment themes. For example, ASI has in recent years targeted its assessments more toward identifying undocumented workers, passport retention practices, legal requirements to engage permanent vs casual workers, etc.

From 2016 to 2019, ASI witness assessments made up approximately two thirds of ASI onsite assessments at palm oil plantations, with compliance assessments comprising the remaining one third. To date, ASI has applied compliance assessments as a regular component of its surveillance of the larger CBs (i.e., CBs that have issued the highest number of certificates), with the smaller CBs usually being subject only to witness assessments. In the event that ASI becomes aware of significant incidents or complaints, ASI also seeks to conduct compliance assessments in addition to its regular surveillance assessment schedule.

Analysis by number of NCs

Overview of NCs identified by CBs

Figure 1 presents a scatter chart of the number of NCs raised by CBs at 1,120 surveillance and re-certification audits conducted between December 2014 and December 2018. The start of this period (December 2014) corresponds roughly to the effective date of the 2013 version of the P&Cs. The x-axis of each point on the chart shows the date of the onsite audit closing meeting, and the y-axis shows the number of NCs raised. The grey line shows a rolling average of the last 100 audits.

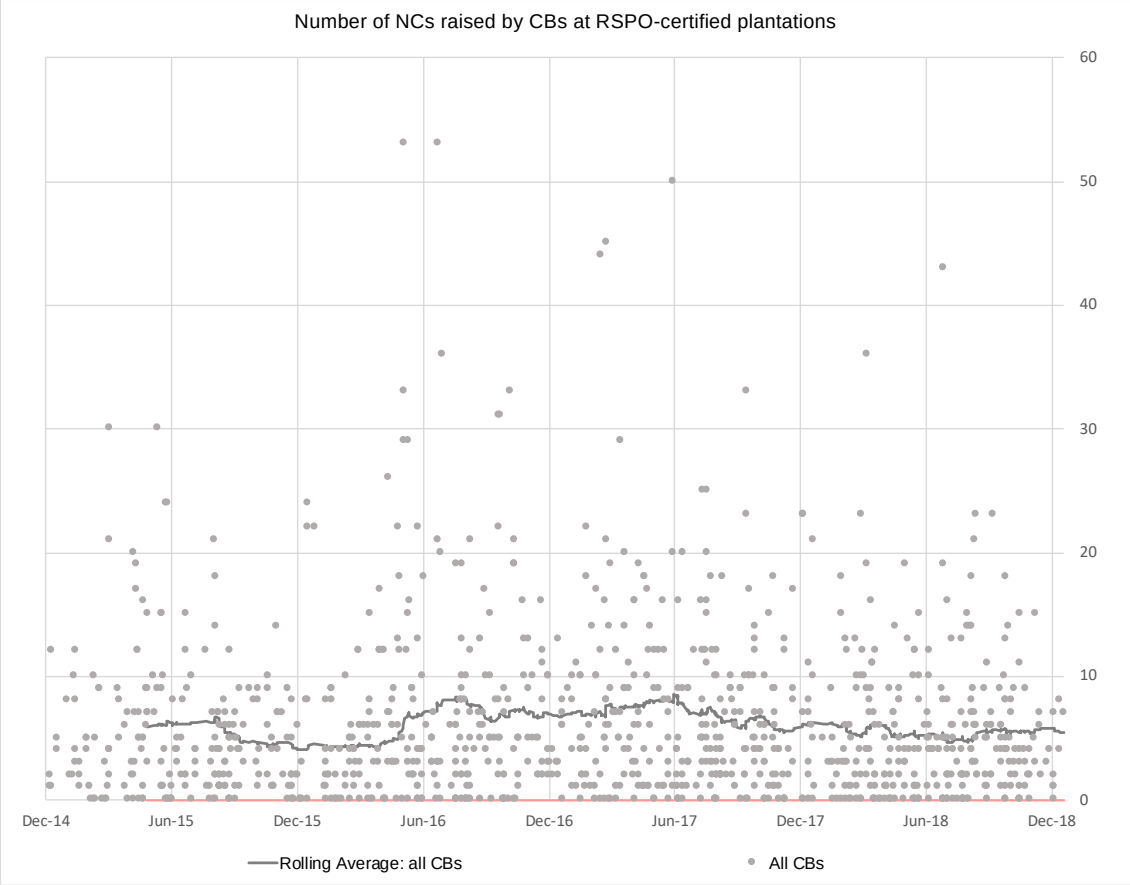

Figure 1: Number of NCs raised by CBs at RSPO-certified plantations

In presenting this chart, initial certification audits have been excluded. The expectation was that these types of audits would generate a higher number of NCs and distort the data. The averages seen in the data show this effect to some extent: the average number of NCs raised at initial audits were 10.0 NCs (n=188) and the average number of NCs from surveillance and recertification audits were 6.0 (n=1120). More fundamentally, presenting the data without initial certifications provides a better indication of the rate of NCs for already-certified units.

The data does not include any audits where major NCs were raised and could not subsequently be closed, resulting in termination of the certificate. The reason for this omission is that RSPO P&C audit reports are not required to be submitted for certificates that are terminated. ASI does not have access to RSPO data that shows the extent of such events and does not know if inclusion of these types of audits would have a significant impact on the data.

The rolling average indicates a possible seasonal effect and an apparent increase in NCs from mid-2016, with a subsequent sustained decline in the two years up to the end of 2018. A possible cause of the increase in NCs is the extent of ASI's sanction activities, which included several suspensions of CBs commencing from late 2015. It would be expected that, if CBs took appropriate action to address previously-undetected NCs in their portfolios, the aggregated data would show an initial increase in NCs in the subsequent year or two, followed by a reduction in NCs if certified units satisfactorily implement corrective actions and NCs are no longer required.

The data in the scatter chart could be used to illustrate that the RSPO certification system, as implemented, has a relatively high tolerance for non-conformity, with every year showing certified units with 30 or more NCs and still maintaining certification (despite a prima facie "non-conformance rate" of around 20%, i.e., 30 divided by 138).

Further analysis, presented in the following sections, provides some indication that the non-conformance rate is understated, when considering the results of ASI assessments. However, the aggregate data should be used with caution, as it does not indicate the quality of NCs raised. For example, it provides no indication as to whether an NC represents a fundamental failure to comply with a P&C indicator, or whether it relates to a relatively inconsequential aspect of that indicator; both scenarios are weighted equally in the data.

Grading of CB NCs

The data includes both minor- and major-graded NCs. The P&Cs specify mandatory grading for each indicator, with major grading specified for approximately half of the P&C indicators. The proportion of NCs raised by CBs that are graded major starts at 52% in 2015, and the proportion rises steadily each year, reaching 67% in 2018. Possible causes for this increase in the proportion of major NCs include CBs upgrading NCs due to repeated occurrences, and a possible propensity to select major-graded indicators in circumstances where noncompliance could be attributed to more than one indicator.

CB NCs by country/region

In Appendix 1, Figure 1 is represented with the data points for specific countries shown in red: Indonesia (Figure 7), Malaysia (Figure 8) and Thailand (Figure 9). The average number of NCs for audits in Indonesia was comparatively higher, at 7.3. The average for Malaysia was 4.9 and Thailand was 5.1. The average for all other countries combined (not presented in Appendix 1) was 4.1 NCs.

P&C NCs identified by ASI

At ASI onsite assessments (i.e., witness and compliance assessments), ASI usually identifies additional NCs against the P&Cs that were not detected by CB auditors. Figure 2 shows the number of potential P&C NCs seen during ASI onsite assessments at RSPO-certified units from 2016 to mid 2019, which were not detected by the CB's latest audit. A caveat is needed here: if ASI conducted a witness assessment and observed that the CB did not conduct any interviews with workers, ASI would raise a finding which requires the CB to conduct corrective action. However the ASI finding that would be raised in such a case *would not* register on Figure 2 as an NC against the P&C indicator, because ASI did not see any evidence of noncompliance by the certified unit. In another scenario, if the CB conducted worker interviews and failed to identify that one category of workers were not paid minimum wage for a particular month, the ASI finding would describe the relevant P&C indicator (6.5.1) and this NC *would be* shown in Figure 2.

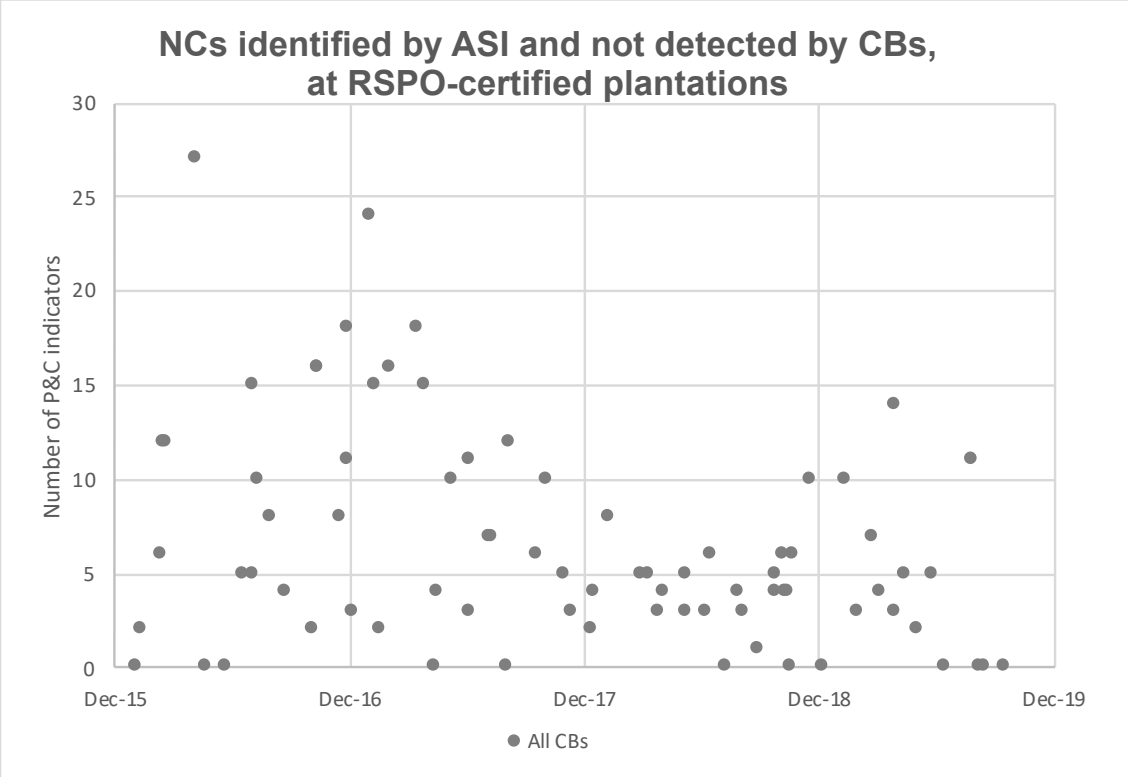

Figure 2: NCs identified by ASI and not detected by CBs at RSPO plantations

Figure 2 shows an overall trend of declining numbers of NCs, with an average of 8.4 in 2016 and 2017, reducing to an average in 2018 and 2019 of 4.3. This is partly due to CBs taking corrective actions as a result of receiving ASI findings, but may also arise from other ways in which CBs have been adapting to the ASI oversight regime, for example the ASI "witness effect", as discussed further below.

ASI witness effect

Across several schemes that ASI is involved in, ASI has identified that CB auditors will often raise more NCs when ASI is witnessing their audit, compared to audits where ASI is not present. For the RSPO scheme, this “witness effect” has become particularly pronounced in recent years, as shown in Figure 3. The number of NCs shown in Figure 3 are the average numbers of NCs raised at CB audits, compared to the average raised by CBs at ASI-witnessed audits.

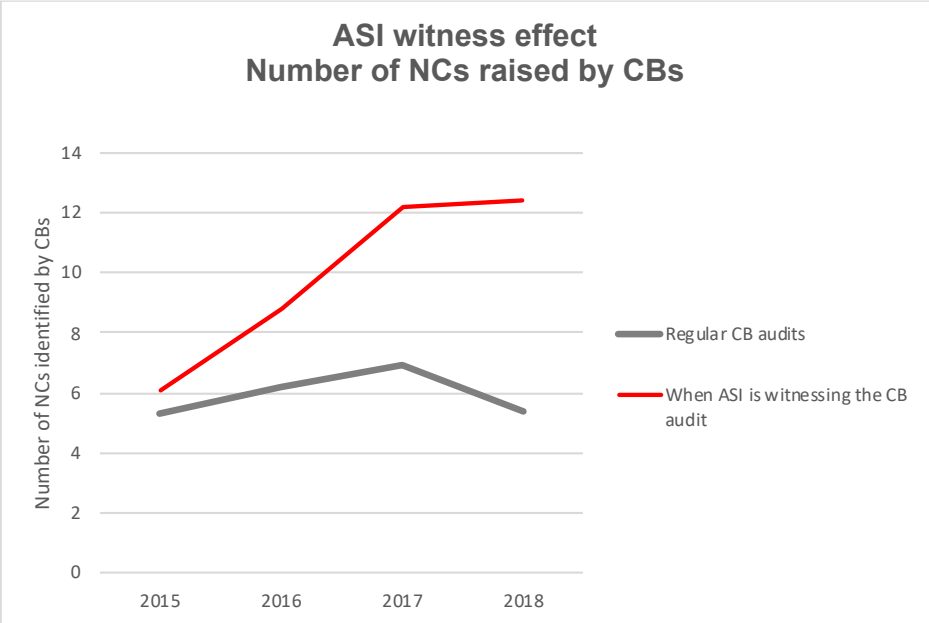

Figure 3: ASI witness effect; Number of NCs raised by CBs

As Chart 3 shows, a CB audit team that was being witnessed by ASI in 2018 raised more than double the number of NCs raised at other audits where ASI was not present. To address this issue, ASI will continue to include a substantial proportion of compliance assessments (i.e., an ASI assessment type where the “witness effect” does not apply) in its schedule of planned onsite assessments. Table 1 shows a further analysis of the trends seen in Figure 3. Initial audits have been excluded and the analysis only includes comparable surveillance audits.

Table 1: Average number of NCs raised by CBs, analysis by grade

Average number of NCs per audit	2015		2016		2017		2018	
	Witnessed N=16	Regular N=201	Witnessed N=14	Regular N=193	Witnessed N=14	Regular N=278	Witnessed N=16	Regular N=331
Average Majors	2.7	2.8	5.2	3.3	6.6	4.3	8.2	3.5
Average Minors	3.4	2.5	3.6	2.9	5.6	2.6	4.2	1.9
Total	6.1	5.3	8.8	6.2	12.2	6.9	12.4	5.4

Effect of CB and lead auditor

Besides changes in average number of NCs per audit, the analysis also highlights differences between various CBs and across CBs' different lead auditors (LAs). Figure 4 presents average number of NCs in initial and surveillance assessments performed by CBs. Figure 5 presents the average number of major and minor NCs raised by the eleven LAs that conducted 10 or more total audits during the period from 2015 to 2018.

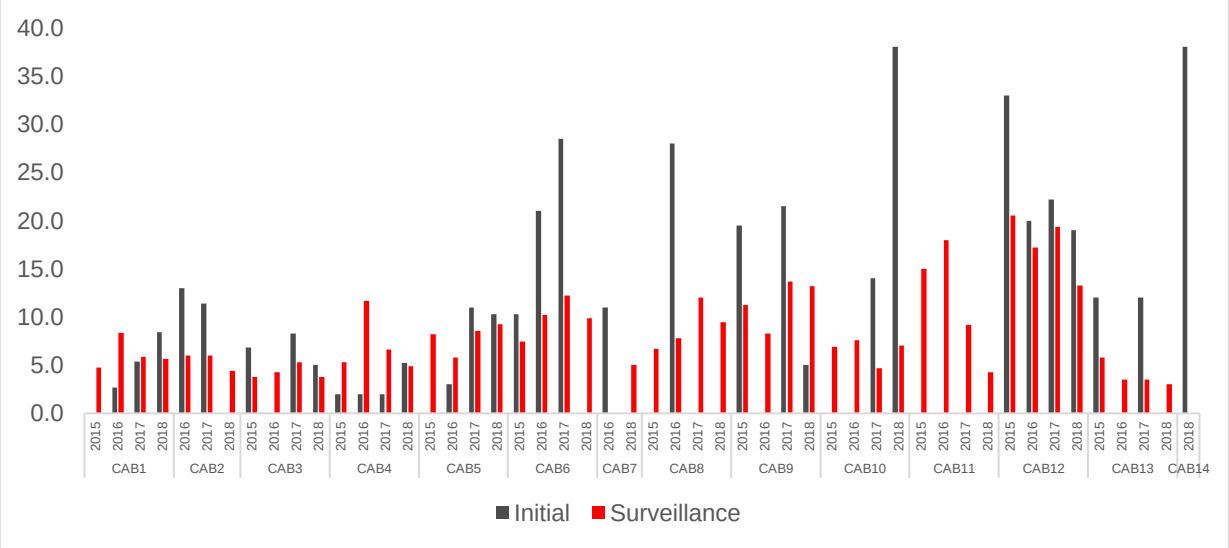

Figure 4: Average number of total NCs raised by CBs in initial and surveillance audits, 2015-2018

In Figure 4, there is considerable variation between CBs. The highest average number of NCs seen for a CB in initial assessments was 38, while the lowest was 2. As for surveillance assessments, the highest average number of NCs was 21, while the lowest was 1.

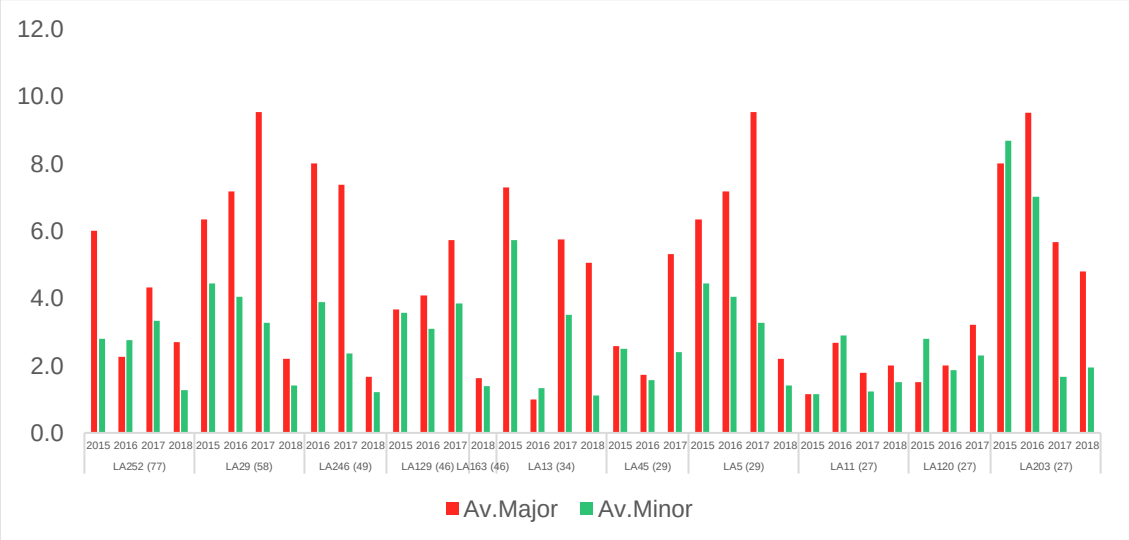

Figure 5: Average total NCs for LAs who have completed 10 or more audits in 2015 to 2018 combined.

Note: The values in brackets indicate the number of audits conducted in 2015 to 2018.

For the 11 most active LAs shown in Figure 5, the average number of major NCs was one, and the highest average was 9.5. For minor NCs, the average number of minor NCs raised was one, and the highest average was 9.

ASI's database shows 312 auditors were involved in conducting RSPO audits during 2015 to 2018, of which 96 were designated as LAs. ASI witnessed 77 LAs performing RSPO audits during the four-year period.

Analysis by type of NC

The previous section presented the **number of NCs** identified by CBs (in summary: lately around six NCs per audit), followed by information from ASI assessments showing information on the extent to which further NCs exist that are not being raised or detected by CBs (in summary: around six additional "witness effect" NCs and four additional ASI-detected NCs, on average per audit).

This section provides an overview of the **type of NCs** being raised by CBs, followed by information on the type of NCs that are not being detected by CBs, based on recent ASI assessments and ASI data analyses.

CB NCs raised per principle

Figure 6 show the distribution of NCs raised by CBs amongst the eight RSPO principles. Around 36% of all CB NCs are found under Principle 4 *Use of appropriate best practices by growers and millers,* followed by Principle 5 (24%) *Environmental responsibility and conservation of natural resources and biodiversity,* Principle 6 (20%) *Responsible consideration of employees, and of individuals and communities affected by growers and mills,* and Principle 2 (14%) *Compliance with applicable laws and regulations.* The aforementioned four Principles 4, 5, 6 and 2 attracted 94% of NCs.

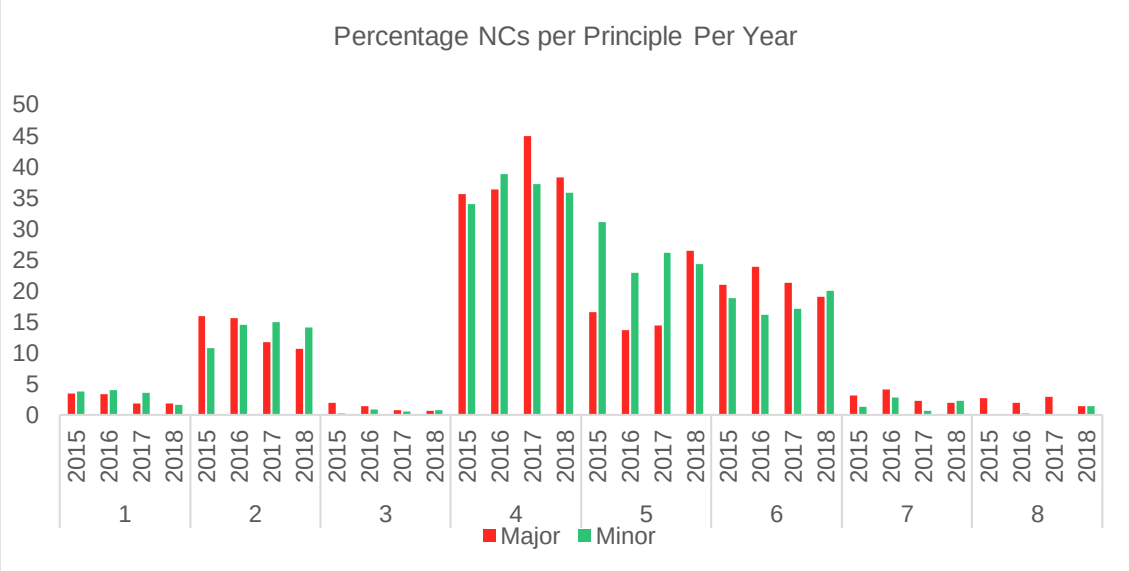

Figure 6: Distribution of NCs, divided into major and minor %, per principle as % of total NCs per year, based on surveillance audits, 2015 - 2018

The remaining four principles, Principle 8 Commitment to continuous improvement in key areas of activity, Principle 3 Commitment to long-term economic and financial viability, Principle 1 Commitment to transparency and Principle 7 Responsible development of new plantings, have less than 6% of all NCs combined.

CB NCs raised, per Criterion

At the Criteria level, the most common NCs raised by CBs at surveillance and recertification audits are:

- 4.7 Occupational Health & Safety (14% of all CB NCs)
- 4.6 Pesticide use (10%)
- 2.1 Legality (9%)
- 5.3 Waste (7%)
- 6.5 Worker benefits (7%)

P&C indicators where CBs raise few NCs

An analysis was performed to identify P&C indicators which attract very few NCs. These might be P&C indicators that are not well understood by CB auditors, or there may be behavioral incentives and/or systemic factors involved.

Reviewing the data at an indicator level, it is striking that a significant number of indicators did not receive any NCs in a whole year (22 indicators without NCs in 2015, 14 in 2016,10 in 2017 and 11 in 2018). These are shown in Table 2. In the four years, the vast majority of the indicators *not* used to raise any NCs belong to Principle 7.

Table 2: Indicators which did not receive any NCs by year, including initial audits.

Indicator	Detail	2015	2016	2017	2018
2.3.3	information availability for communities and stakeholders	none	none	none	
2.3.4	communities representativeness and consent	none	none	none	
4.3.5	drainability assessments for long term viability	none			
4.6.8	aerial pesticides application with justification	none			
5.5.2	controlled burning with approval	none		none	
6.4.3	process and outcome of any negotiated agreement, documented, evidence of participation and publicly available				none
6.6.1	workers trade union, freedom of association document			none	
6.8.3	recruitment selection fairness demonstration		none		

6.11.2	improvement of smallholder productivity evidence	none	none		
6.12.2	evidence for no contract substitution occurrence			none	
7.1.1	independent social and environmental impact assessment	none			
7.1.2	appropriate management planning and operational procedures	none			
7.1.3	development includes outgrowers schemes				none
7.2.1	soil suitability maps or soil surveys shall be available	none			
7.2.2	topographic information adequate to guide the planning	none			none
7.3.2	comprehensive HCV assessment and stakeholder consultation	none			
7.3.4	action plan describing operational actions (HCV assessment)		none		
7.3.5	identification of areas required by communities	none	none	none	none
7.4.1	maps for marginal and fragile soils available and used	none			
7.4.2	where limited planting, plans shall be developed	none		none	
7.5.1	local people possibility to deny consent	none	none	none	
7.6.1	identification and assessment of customary and user rights	none		none	
7.6.2	system identifying people entitled to compensation in place	none	none		none
7.6.3	fair compensation system	none	none	none	none
7.6.4	opportunities to affected communities	none	none	none	none
7.6.5	documentation and compensation	none	none	none	none
7.6.6	information accessibilities of the communities	none	none	none	none
7.7.1	no land preparation by burning, unless specific situations,	none		none	
7.7.2	evidence of prior approval of the controlled burning	none		none	none
7.8.1	carbon stock of the proposed development area identified			none	
7.8.2	plan to minimise net GHG emissions (avoid areas with high carbon stocks)			none	none

The majority of the indicators with no NCs raised by CBs fall under Principles 7 and under Principle 2 relating to free, prior and informed consent (FPIC). These touch on core issues such as land grabbing, community consent prior to land development, etc. The indicators under these principles are also applicable at the new planting procedure (NPP) stage, which precedes RSPO certification by several years (typically: at least five years). However, there are no formal mechanisms in the RSPO accreditation framework to report NCs identified in NPP verifications. The data in this study therefore does not include NCs that might have been identified in NPP verifications.

In mid-2016, the RSPO introduced expanded NPP requirements (NPP 2015), which increased the minimum extent of involvement required from CBs. In February 2018, RSPO published Mandatory Requirements for CBs Assessing FPIC at NPP in response to concerns that NPPs have been failing to adequately assess FPIC issues, land conflicts and complaints.

During some ASI assessments of CB's certification audits, ASI has identified instances where CB auditors lacked understanding on the intent and applicability of Principle 7. For example, auditors were marking Principle 7 as "Not applicable" in their audit reports, with some auditors stating (incorrectly) that Principle 7 is not applicable if there are no new plantings being conducted at the date of the audit. Alternatively, auditors sometimes stated that Principle 7 is not applicable because it was evaluated during an NPP evaluation performed for the grower in the past. However, prior to ASI intervention (i.e., ASI raising NCs against CBs), CB auditors were generally not evaluating against P&C indicators during NPP verifications, raising the possibility that the relevant P&Cs may not have been covered in either type of audit (i.e., not in certification assessments, nor in NPP verifications).

Another aspect to consider is that the P&Cs applicable for FPIC and new plantings tend to only arise once, at the establishment stage of a plantation. In comparison, some of the P&Cs that feature more often in NCs raised by CBs are those relating to ongoing production processes, and where NCs might re-occur. This distinction might explain why there are fewer NCs raised against FPIC and Principle 7 indicators, however it does not explain why there are zero (or close to zero) occurrences, particularly given that there are several examples of breaches of these P&C indicators that were reported in the RSPO Complaints process, particularly in Indonesia.

Behavioral factors are also relevant. CBs and their auditors have little incentive to fully investigate events that occurred several years in the past, especially if these events were generally considered to be in compliance with the law of that country, were common industry practice, and where any re-interpretation under current RSPO requirements would preclude certification and risk losing an audit client. Further, records of these past events are generally kept at the head office and not at the operating unit/site being audited. Over the last few years, ASI has raised NCs against CBs in these areas, however these have been the result of generalized sampling; ASI assessments have not specifically targeted these areas. For example, ASI has not yet conducted any witness of NPP verifications.

ASI assessments have also identified CBs certification audits that have not included sufficient direct consultation with previous users of land to ensure that land acquisitions were conducted with communities' free, prior and informed consent, and there has not been sufficient checking of compliance with FPIC agreements. Since 2018, substantially all P&C-accredited CBs have received NCs from ASI which have required them to introduce additional audit procedures to ensure that audit teams consult with previous users of land. Implementation of these additional procedures across CBs' portfolios of clients is ongoing and has been partially evaluated at some recent ASI witness assessments.

Finally, it is important to note that the extent of application of some of these criteria is controversial. Expecting individual local CB auditors to challenge past events that form the basis upon which a nationally-important industry has been operating for decades is not reasonable. Any further intervention here will need to recognise the need for support from a much wider group of players and stakeholders.

NCs not detected by CBs

The above sections discussed the available data on NCs (by type) that were detected by CBs. ASI assessments provide some insight into the type of NCs against P&C indicators that are *not* being detected by CBs. These omissions are extensively documented in the reports that ASI produces after each ASI onsite assessment. This section provides a summary of common themes.

ASI's analysis of P&C NCs not detected by CBs indicates that the majority of these – around two thirds – relate to treatment of workers. Treatment of local communities and treatment of environment each make up around 15% of ASI's P&C-indicator-level NCs.

The P&C indicators cited in ASI's NCs for treatment of workers are spread across several categories of P&Cs. The most common are those are under Criteria 6.5 (Pay & conditions, with all indicators 6.5.1 to 6.5.4 typically cited) and Indicator 2.1.1 (legal compliance), followed by Criteria 4.7 (Occupational Health & Safety, frequently citing protective equipment, pesticide use). Also frequently cited are criteria 6.8 and 6.9 (discrimination, harassment), 6.12 and 6.13 (forced labour indicators, human rights), 6.3 (grievances), 4.8 (training), 6.6 (worker unions) and 4.1 (standard operating procedures).

For treatment of local communities, the most commonly cited indicators are those under criteria 6.1 (social impact assessment), 6.3 (grievances) and 2.2 & 2.3 (FPIC). For environmental aspects, the commonly cited indicators are under criteria 5.2 (HCV areas), 5.3 (waste) and 4.2 (soil).

In recent years, ASI findings show an increase in the number of NCs citing worker-related legal requirements under P&C indicator 2.1.1, possibly as result of the ASI assessor team becoming more aware of national legal requirements in each country, introduction of new laws in these countries, and ASI thematic focus on specific areas such as undocumented workers.

In addition to ASI's regular accreditation activities, ASI is seeking to address systemic issues by actively engaging with RSPO on social auditing requirements (e.g., auditor training), and in identifying other areas where improvements can be made to the certification system.

Appendix 1

Figure 1, as represented with the data points for specific countries shown in red.

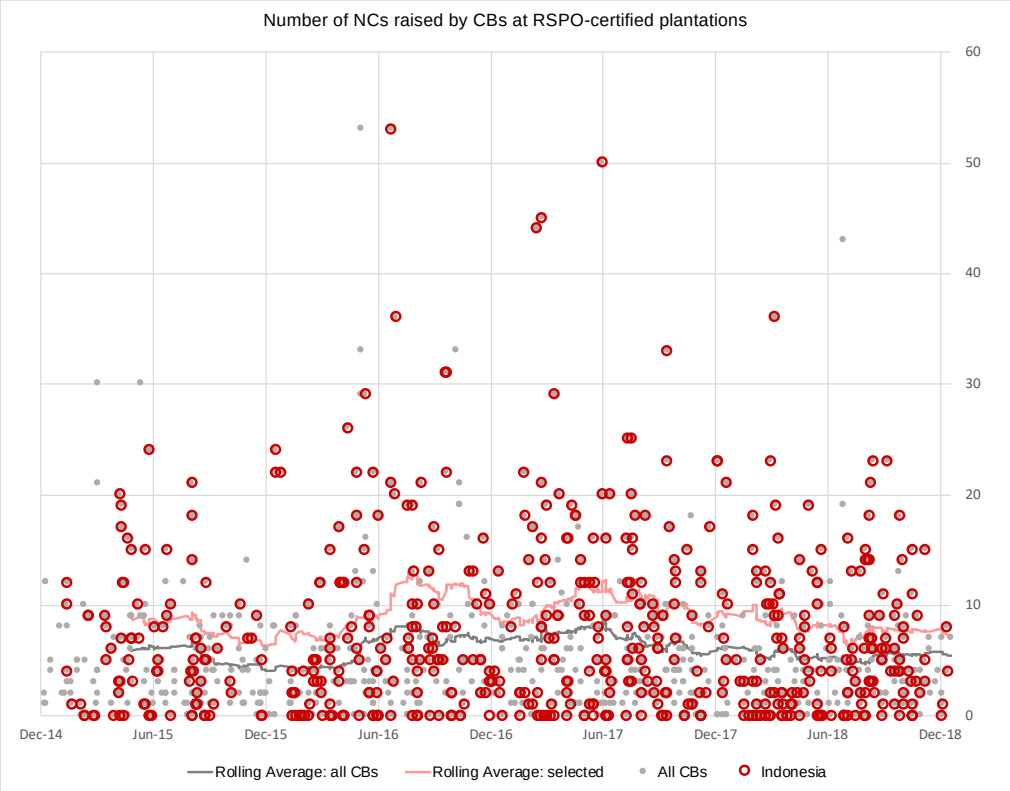

Figure 7: Indonesia

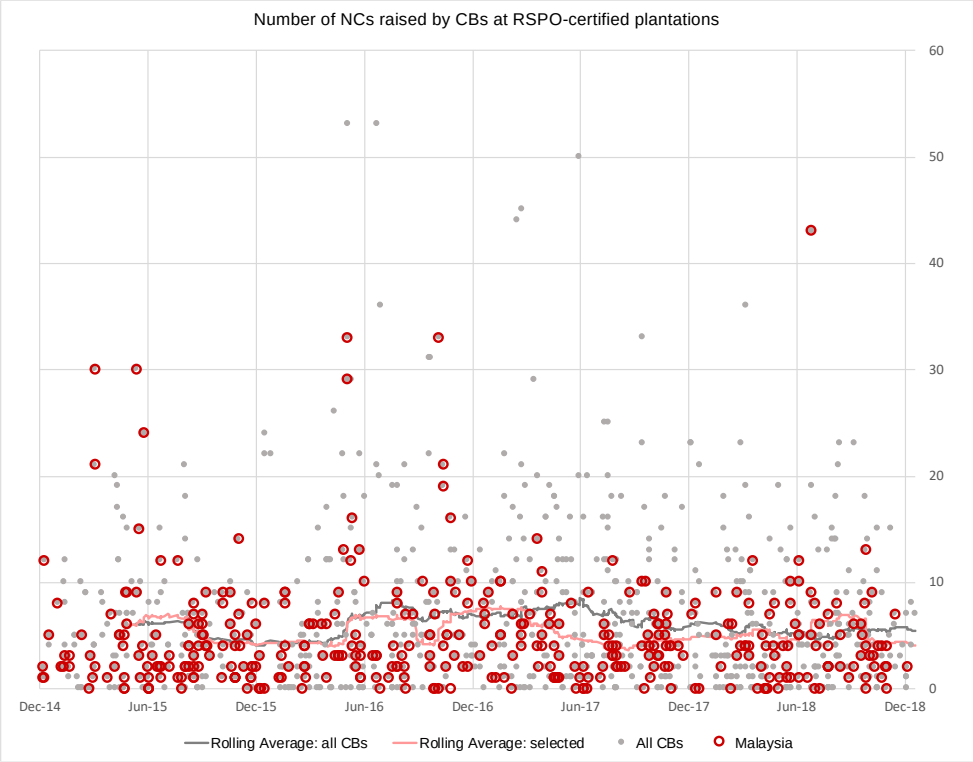

Figure 8: Malaysia

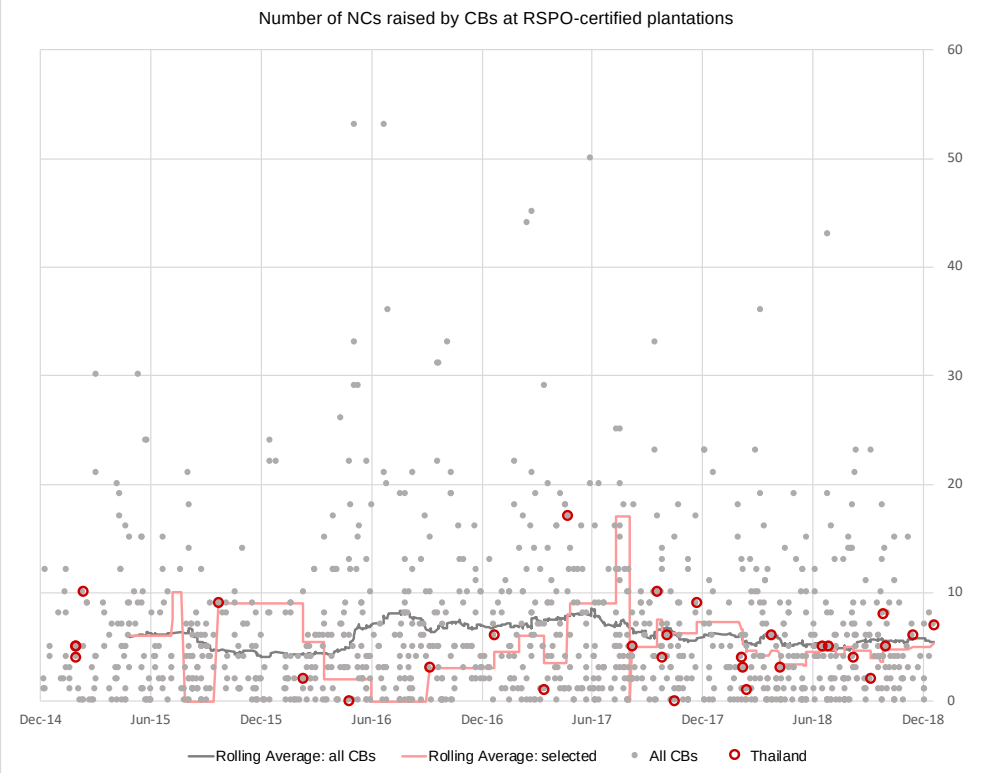

Figure 9: Thailand