

#	Indicator	Comment (English)
1	Introduction	Retailers in Europe are concerned that the P&Cs as currently implemented will not provide the compliance required under the EUDR legislation. This is particularly problematic for mass balance volumes, as well as derivatives and fractions. We would like the current review to take note of the EUDR implementation timescale (Dec 2024) and to ensure that any required changes to bring it in line with EUDR are brought to the General Assembly in 2023.
2	Preamble	"add all the reference that appears in the requirements (this will help new joiner having a more exhaustive view of requirements): <ul style="list-style-type: none"> - RaCP - GHG assessment for new developments - GHG calculator - Metric template - FPIC guidance - CSDSF complaint system - Chile labour remediation guidance - BMP for rehabilitation of riparian"

#	Indicator	Comment (English)
1	Definition	better source than Wikipedia ?
2	Definition	The bribe/bribery should be defined in the oil palm context and do not use general Wikipedia definitions.
3	Definition	"...there should be restrictions on hours of work and overtime..." This is another global but vague definition. Why is it not related to working conditions in the oil palm context and the labor situation in the oil palm industry?
4	Definition	Most agreements are enforceable by law. RSPO needs to redefine or be more specific to the agreements referred to.
5	Definition	Definition of Bribery and Corruption ?
6	Definition	the assessmentS and FPIC
7	Definition	<p>"[HRSS] The definition of Child Labour should follow ILO standards on minimum age as reflected in this definition.</p> <p>Please note that under Draft 2 Indicator 6.4.2 and 6.4.3, RSPO has raised the age limit on prohibition of child labor to 18 years, which may be considered to be beyond ILO's requirements on Child labour. If draft 2 indicator 6.4.2 and 6.4.3 is accepted, then this definition has be amended to make it aligned.</p> <p>Raising of age to 18 years may bring unintended consequences for young workers who are already engaged by the UoC such as depriving them livelihood opportunities and that the UoC will now have to terminate their employment despite the fact that ILO requirements permit them.</p> <p>Propose to retain the current definition of child labour as set out in the definition section and that Indicator 6.4.2 and 6.4.3 to be aligned with this definition."</p>
8	Definition	The stress on reduction is premature in this definition as it is directly copy-pasted from the Waste4Change website. RSPO as an organization should be mature enough to define the 3R concept based on conditions in estates, especially rural areas where the use of plastic is rampant especially when drinking water is unavailable through the estate infrastructure and needs to be purchased. In most rural estates, there is no recycling support, and RSPO must be cognizant of this factor. Thus, a more realistic definition of 3R should be coined.
9	Definition	This is a convoluted attempt to be all-inclusive. Please simplify the definition. The standard should be readable, especially for individuals and organizations having a poor command of English. Translations could become messier.
10	Definition	Suggest to add a definition of 'child-sensitive' (reference 2.4.1)

#	Indicator	Comment (English)
11	Definition	<p>"The latest version of Accountability Framework's definition was issued in 2020. No major difference in the text, however. The full definition is as follow: Deforestation ""Loss of natural forest as a result of: i) conversion to agriculture or other non-forest land use; ii) conversion to a tree plantation; or iii) severe and sustained degradation.""</p> <p>This definition pertains to no-deforestation supply chain commitments, which generally focus on preventing the conversion of natural forests. Severe degradation (scenario iii in the definition) constitutes deforestation even if the land is not subsequently used for a non-forest land use. Loss of natural forest that meets this definition is considered to be deforestation regardless of whether or not it is legal. The Accountability Framework's definition of deforestation signifies 'gross deforestation' of natural forest where 'gross' is used in the sense of 'total; aggregate; without deduction for reforestation or other offset.</p> <p>See: https://accountability-framework.org/use-the-accountability-framework/definitions/"</p>
12	Definition	<p>"Several definitions from 2018 P+C have been removed - suggest either reinstate these or ensure these are adequately explained in relevant indicators? e.g.:</p> <p>due diligence, extensive replanting on steep terrain, facilitation payment, family farm, food security, gender equal, independent smallholder, in good faith, integrated pest management, ISO standards, landscape, landscape level, outgrowers, site, transmigrant, undue influence, water security"</p>
13	Definition	<p>"Expand the defenitions in this list. Especially those terms that you refer to in existing defenitions.</p> <p>For example how is natural forest defined? Plantation forest, agricultural use?</p> <p>Try to match with existing defenitions. Consider EUDR because this can help make RSPO relevant for members needing to comply with EUDR."</p>

#	Indicator	Comment (English)
14	Definition	<p>"Adding suggestions for definitions used throughout the document:</p> <ol style="list-style-type: none"> 1. Conservation Area: An area with the main purpose to conserve environmental and social values. 2. Free, Prior and Informed Consent: The right of Indigenous Peoples, Local Communities, and other users to give or to withhold their consent to any project affecting their lands, livelihoods and environment. (Source: RSPO FREE, PRIOR AND INFORMED CONSENT (FPIC) GUIDE (2022)) 3. High Carbon Stock Approach (HCSA): A methodology that distinguishes forest areas for protection from degraded lands with low carbon and biodiversity values, that may be developed. The methodology was developed with the aim to ensure a practical, transparent, robust, and scientifically credible approach that is widely accepted to implement commitments to halt deforestation in the tropics, while ensuring the rights and livelihoods of local people are respected (Source: HCSA Membership Requirements) 4. High Carbon Stock Social Requirements: Social requirements that are outlined in Module 2 of the HCSA Toolkit"
15	Definition	<p>"To consider defining the scope of 'environmental HRD'. A suggested reference from the Accountability Framework's definitions: water, air, land, flora, and fauna.</p> <p>Full definitions of ""environmental and human rights defenders"" for reference: Individuals or groups who, in their personal or professional capacity and in a peaceful manner, act to protect and promote human rights, eliminate human rights violations, or protect the environment, including water, air, land, flora, and fauna. "</p>
16	Definition	consider changing into: ".. area identified as.."
17	Definition	Definition of Land Clearing- Parameters need to be established. 10 ha per year? 10 ha per Unit of Certification since 2018? etc.
18	Definition	Labour recruiter / Labour contractor (2.1.2)
19	Definition	Add a definition for "Management review" (3.1.3)
20	Definition	Instead of saying "other conservation areas," this should explicitly call out currently protected areas as defined by local, state, regional, national, and international agreements or legislation.
21	Definition	this definition on limited replanting does not make sense, seems to be using the wording from when this was framed as extensive replanting? Currently states limited planting means planting on contiguous area more than 25 ha, needs to be corrected. Also not clear with current wording how the 25 ha limit and 1% relate - is it 'up to 25 ha, and only up to 1% if that 1% is lower than 25 ha'?

#	Indicator	Comment (English)
22	Definition	concerned that this new definition will allow for more planting on fragile and marginal soils. Especially as timeframe not defined - e.g. is it allowed to replant 100ha on fragile soils one year, and 3 years later replant a different 100ha on fragile soils as well? It would be stronger, clearer, more auditable to take a clear position that no planting on fragile and marginal soils is allowed. Focus should then be on how to support small growers not to do this. See also comments on indicators 7.3.3 and 7.3.4
23	Definition	"Consider adopting Accountability Framework's definition: Natural ecosystem An ecosystem that substantially resembles — in terms of species composition, structure, and ecological function — one that is or would be found in a given area in the absence of major human impacts. This includes human-managed ecosystems where much of the natural species composition, structure, and ecological function are present. Natural ecosystems include: -Largely 'pristine' natural ecosystems that have not been subject to major human impacts in recent history -Regenerated natural ecosystems that were subject to major impacts in the past (for instance by agriculture, livestock raising, tree plantations, or intensive logging) but where the main causes of impact have ceased or greatly diminished and the ecosystem has attained species composition, structure, and ecological function similar to prior or other contemporary natural ecosystems -Managed natural ecosystems (including many ecosystems that could be referred to as 'semi-natural') where much of the ecosystem's composition, structure, and ecological function are present; this includes managed natural forests as well as native grasslands or rangelands that are, or have historically been, grazed by livestock -Natural ecosystems that have been partially degraded by anthropogenic or natural causes (e.g., harvesting, fire, climate change, invasive species, or others) but where the land has not been converted to another use and where much of the ecosystem's composition, structure, and ecological function remain present or are expected to regenerate naturally or by management for ecological restoration"
24	Definition	Suggest to add the definition of 'New development', so that we understand what is 'new planting' vs. 'new development'
25	Definition	Consider making jurisdictional laws more explicit based on the Accountability Framework's definition: "National laws include the laws and regulations of all jurisdictions within a nation (local, regional, and national)." --> under the definition of 'Applicable Law'
26	Definition	What when land is being replanted to create primary forest again?
27	Definition	confusing because above you say without human activity
28	Definition	make specific link to what fao defention you mean
29	Definition	Confusing wording. naturally regenerating can also occur when land is deforested and left alone

#	Indicator	Comment (English)
30	Definition	<p>"Consider adding a definition of natural forest (but not replacing the primary forest definition) based on the Accountability Framework's definition: Natural forest A forest that is a natural ecosystem.</p> <ul style="list-style-type: none"> - Natural forests possess many or most of the characteristics of a forest native to the given site, including species composition, structure, and ecological function. <p>Natural forests include:</p> <ul style="list-style-type: none"> - Primary forests that have not been subject to major human impacts in recent history - Regenerated (second-growth) forests that were subject to major impacts in the past (for instance by agriculture, livestock raising, tree plantations, or intensive logging) but where the main causes of impact have ceased or greatly diminished and the ecosystem has attained much of the species composition, structure, and ecological function of prior or other contemporary natural ecosystems <p>Managed natural forests where much of the ecosystem's composition, structure, and ecological function exist in the presence of activities such as:</p> <ul style="list-style-type: none"> - Harvesting of timber or other forest products, including management to promote high-value species - Low intensity, small-scale cultivation within the forest, such as less-intensive forms of swidden agriculture in a forest mosaic <p>Forests that have been partially degraded by anthropogenic or natural causes (e.g., harvesting, fire, climate change, invasive species, or others) but where the land has not been converted to another use and where degradation does not result in the sustained reduction of tree cover below the thresholds that define a forest or sustained loss of other main elements of ecosystem composition, structure, and ecological function</p> <p>The categories 'natural forest' and 'tree plantation' are mutually exclusive, though in some cases the distinction may be nuanced. Please see the Operational Guidance on Applying the Definitions Related to Deforestation, Conversion, and Protection of Ecosystems for further discussion of boundary cases.</p> <p>For the purpose of corporate no-deforestation commitments, the focus is on preventing the conversion of natural forests."</p>
31	Definition	define also other types of forest relevant for RSPO

#	Indicator	Comment (English)
32	Definition	This definition should be changed to, or adapted to reflect definition from the United Nations Convention to Combat Desertification: "The ecological process to restore a natural and safe landscape for humans, wildlife, and plant communities."
33	Definition	depending on what has been lost. should the aim also include natural state.. or better to the state before degradation and or conversion to be able to recover lost ecological and social functions
34	Definition	within the plantation or management unit?
35	Definition	<p>[HRSS] To delete the first sentence as this is not aligned with ILO's definition of recruitment fees. Revert to draft 1 definition: ""The terms 'recruitment fees' or 'related costs' refer to any fees or costs incurred in the recruitment process in order for workers to secure employment or placement, regardless of the manner, timing or location of their imposition or collection.</p> <p>Recruitment fees include:</p> <ul style="list-style-type: none"> a. payments for recruitment services offered by labour recruiters, whether public or private, in matching offers of and applications for employment; b. payments made in the case of recruitment of workers with a view to employing them to perform work for a third party; c. payments made in the case of direct recruitment by the employer; or d. payments required to recover recruitment fees from workers. <p>These fees may be one-time or recurring and cover recruiting, referral and placement services which could include advertising, disseminating information, arranging interviews, submitting documents for government clearances, confirming credentials, organizing travel and transportation, and placement into employment.""</p>
36	Definition	<p>"doesn't work grammatically. the verb is defined as a location (the oil palm plantation where replanting takes place)</p> <p>should refer to the action"</p>
37	Definition	<p>"Consider referring to the Accountability Framework's definition on the environmental restoration and human rights harm contexts:</p> <p>Restoration The process of assisting the recovery of an ecosystem, and its associated conservation values, that has been degraded, damaged, or destroyed.</p> <p>The term 'restoration' is also used in the context of remediation of human rights harms, for which restoration may come in many forms (e.g., restoration of benefits, employment, or access to lands). See the Operational Guidance on Remediation and Access to Remedy."</p>
38	Definition	Should be changed to "areas with a slope greater than 25 degrees..."

#	Indicator	Comment (English)
39	Definition	spell out abbreviation in first time word is used. Not here
40	Definition	oil palm
41	Definition	oil palm
42	Definition	3.4.1 mention "Outgrower scheme" add a definition or remove outgrowers from 3.4.1
43	Definition	<p>"Consider expanding the definition, referring to Accountability Framework's:</p> <p>Risk assessment A systematic process of evaluating potential risk in a company's current or future operations, supply chains, and investments.</p> <p>In the context of the Accountability Framework, this term refers to the assessment of risk of non-compliance with the company commitments or applicable law related to the Accountability Framework's scope, as well as adverse impacts to internationally recognised human rights. This is different from the use of the term in a general business context, where it refers to the assessment of financial risks and the drivers of such risk (e.g., legal risk, credit risk, reputation risk, and others). Risk of adverse social and environmental impacts, including non-compliance with company commitments, can be an important element of broader business risk."</p>
44	Definition	Suggest to add a definition and guidance for 'geo-location' (reference 2.3)
45	Definition	<p>"I believe that the definition of communities could be more generic (not to exclude those who are not mentioned there); For example:</p> <p>Communities: people living near palm plantations, extractors or new developments that may be positively or negatively impacted by agricultural exploitation or industrial operation. It includes indigenous peoples and other interested parties, according to the context of the UDC."</p>
46	Definition	It should be understood as affectation to positive impacts in an inclusive way, the connotation of the term is associated with negative aspects. The term "impacts" in exchange for "effects" should be used
47	Definition	It must be established in the definition that the definition of force majeure established by the national legislation of each country may be adopted in case
48	Definition	The scope of this definition is impossible to comply with any company, precisely what is unforeseen and that are not because of any of the parties, is the justification for not forcing a salary payment that as defined can be medium and up to long term.
49	Definition	The concept associated with extreme weather conditions is not peat, it can be from heavy rains, the phenomenon of the girl or the boy to a strong drought.

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50	Definition	Essential agricultural work are the activities that are not interrupted? How the harvest? or includes those that are carried out less frequently such as health, fertilization and maintenance work?
51	Definition	"Essential works are directly related to the production process, they are part of the agricultural activity or the industrial process and affect the final result. Example: Surveillance is not an essential process."
52	Definition	I think that clarification on "new development" that is in the indicators must be included. In addition, when a "new development" requires or not CLPI.
53	Definition	It does not give clarity to the concept, it refers to another document. It must refer to the amount of carbon captured and the negative effect of freeing it to the environment through the process associated with deforestation and negative footprint when it is replaced by crops that will not compensate for capture volumes in a reasonable period of time.
54	Definition	Formed by representatives of the employer and the workers, not directly by the employer, and its function is not to study the elaboration of standards, its function must be to define and implement these standards.
55	Definition	Include right to transit by servitude (customary rights)
56	Definition	Examples on light work could be placed, just as there are in dangerous work.
57	Definition	"It would be appropriate to expand the definition A: Due environmental diligence Due social diligence There is talk of ""due diligence"" but it is not said what does it contain?"
58	Definition	Incomplete definition in Spanish traduction.
59	Definition	Add the definition of new developments
60	Definition	"It is already a vital salary It is very important that Malaysia knows that in Latin America the current minimum legal wage has contemplated many variables that are mentioned in this definition; But, it is impossible (and unsustainable) to comply with such salary being free of deductions because the law allows tax deductions, for social security contributions, for food demands, loans or others ..."
61	Definition	As I mentioned before, in Latam there is the small independent producer who does make decisions about his land and wishes to be part of the nucleus (extractor supply base and certify with it).

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62	Definition	<p>"It is necessary and priority to improve and clarify the definitions of:</p> <ul style="list-style-type: none"> -Associate producer; -Small system producer; -Small independent producer and, -Independent producer associated with an extractor plant. <p>In Latin America there is the small independent producer who does not want to be certified individually or in the standard that corresponds to small independent producers and that, he prefers, to associate with an extractor plant (under the certificate of it).</p> <p>It is ""independent"" because it makes decisions about its plantation (the extractor does not take them for it); And it is ""associated"" because the plant provides contract, technical assistance and some additional benefits. For the resources you have, you should meet only the indicators of the standard of children and not those of full PyC."</p>
63	Definition	<p>Important to clarify whether the definition corresponds specifically to indigenous peoples or on the contrary to any community that voluntarily isolates. In that order of ideas, it is important that if a community is voluntarily isolated without being considered an indigenous people, it has a valid legal document that certifies the presence in the territory, otherwise we would open the door to link any community that is considered to be isolated voluntarily.</p>
64	Definition	<p>"According to Latinomaérica countries there is generally an entity that legitimizes indigenous people or populations; If the clarification is not made, this can be provided to ""legalize"" invasions of people outside the plantations that settle without legitimacy in them ..."</p>
65	Definition	<p>The type of contract with the worker depends on what the legislation of each country allows. A temporal worker, for example, can have a definite term contract.</p>
66	Definition	<p>Hasto: It needs to be clarified again for the definition of core workers / core jobs for in gardens and factories, not all types of work enter the core worker / core work.</p>

#	Indicator	Comment (English)
1	1	<p>"Compared to the 2018 P&C, is the structure of the standard better, the same or worse? Difficult to comment as no table of contents was included in draft 2. We note that in section 3 scope, reference is made to mills, medium growers and scheme smallholders stating that there are specific indicators for them, but this is not obvious in draft 2 – seems only the standard indicators are listed with no visual differentiation if indeed there are any that are only applicable to a specific type of grower. Include clear visual marking of indicators that are only applicable to specific groups of growers.</p> <p>We note many indicators have been merged again, after 2018 P&C separated them out following comments from auditors that raising CARs is clearer when a single indicator does not cover multiple aspects. We would urge seeking confirmation from CBs re their preference as ultimately it's in everyone's interest to have CARs clearly communicated and resolved.</p> <p>We miss the guidance and other annexes, so again, difficult to comment whether this is overall better, the same or worse as the document is incomplete."</p>
2	1	<p>"Any other general comments and observations about the P&C that can be added : normative and informative text (guidance), definitions, resources etc. > Ensure that the NIWGs have balanced representation and technical know-how to look at these various topics [The following criteria are addressed through national Interpretation: 2.1 (Legal compliance), 3.4 (Social and Environmental Impact Assessment), 3.5 (Soil fertility), 6.4 (Child labour), 6.7 (Forced Labour), 7.1 (Integrated Pest Management), 7.2 (3R Reduce-Reuse-Recycle Concept), 7.3 (Soil erosion and degradation), 7.4 (Land clearing on peat), 7.5 (Surface and groundwater), 7.7 (GHG emissions)]"</p>
3	1	<p>"Compared to the 2018 P&C, is the clarity of language in the new draft better, the same or worse? >Wording needs to be checked to avoid confusion (e.g. Criteria e.g. 4.2 and 4.4) >Make the language a bit more straightforward when you break it up into a few sentences > Specific check and confirmation of use of 'shall' with NIWGs where translated texts are used [>Sentence: even longer than it used to be > Reverted to use of 'shall' – this had been removed in 2018 P&C and active language used for easier translation into other languages following feedback on issues with translations]."</p>
4	1	they are not in italic in the current draft
5	1.1	Consult and confirm with CBs re this renewed merging of indicators as otherwise next P&C review you have to take them apart again [Proposed C1 is exemplary for merging indicators throughout the draft. In the past, CB comments about single issue indicators had led to separating out the individual elements to make auditing and raising of CARs clearer. This now seems to have been reversed].
6	1.1	What is meant by adequate? Especially for auditors.

#	Indicator	Comment (English)
7	1.1	1.1 The Unit of Certification provides adequate information via a transparent process to relevant stakeholders on environmental, social and legal issues relevant to RSPO Principles & Criteria, in appropriate languages and forms to allow for effective participation in decision-making - according to relevant standards agreed by said stakeholders
8	1.1	"1.1 The Unit of Certification provides adequate information via a transparent process to relevant stakeholders on environmental, social and legal issues relevant to RSPO Principles & Criteria, in appropriate languages and forms to allow for effective participation in decision-making - according to relevant standards agreed by said stakeholders"
9	1.1	1.1 The Unit of Certification provides adequate information via a transparent process to relevant stakeholders on environmental, social and legal issues relevant to RSPO Principles & Criteria, in appropriate languages and forms to allow for effective participation in decision-making - according to relevant standards agreed by said stakeholders
10	1.1	The Unit of Certification provides adequate information via a transparent process to relevant stakeholders on environmental, social and legal issues relevant to RSPO Principles & Criteria, in appropriate languages and forms to allow for effective participation in decision-making - according to relevant standards agreed by said stakeholders
11	1.1.1	There should be specific guidance or further explanation on what is meant by "confidential information".
12	1.1.1	"speficied" - spelling error.
13	1.1.1	In all the standard it is important that the differentiation between what it should apply for a medium and large producer is made.
14	1.1.1	1.1.1 Continue to take the same structure of guide 1.1.1. 2018, without incurring the confidentiality of the company
15	1.1.1	Eliminate "FREE" - Not synchronous with the English version
16	1.1.1	Proposed Indicator 1.1.1: Representing the word "for free" because there will be perception that there are documents provided in paid.
17	1.1.1	1.1 Certification Unit never implements payments if stakeholders want to access information/management documents related to PNC RSPO, so this indicator regarding the provision of documents for free is not necessary
18	1.1.1	Deleted the word "for free" because if it is said for free, the perception arises that there are documents provided in paid
19	1.1.1	Deleted the word "for free" because if it is said for free, the perception arises that there are documents provided in paid
20	1.1.1	In indicator 1.1.1 there is the word "free". The word should be deleted so as not to cause new perceptions in the form of documents provided paid.
21	1.1.1	1.1.1 - Deleted the word "for free" because if it is said for free, the perception arises that there are documents provided in paid
22	1.1.1	1.1.1: The word "free" is deleted because if it is said for free, the perception arises that there are documents provided in paid
23	1.1.1	Proposed: Deleted the word "for free" because if it is said for free, the perception arises that there are documents provided in paid
24	1.1.1	Proposed: Deleted the word "for free" because if it is said for free, the perception arises that there are documents provided in paid

#	Indicator	Comment (English)
25	1.1.1	"Comment: Deleted the word ""for free"" because if it is said for free, the perception arises that there are documents provided in paid Proposed changes: 1.1.1 (c) Except for confidential information, management documents specified in the RSPO P&C are provided for the public and in the language as they should."
26	1.1.1	Proposed Indicator 1.1.1: Deleted the word "for free" because if it is said for free, the perception arises that there are documents provided in paid
27	1.1.1	Indicator 1.1.1 (c) Proposed to: The word "for free" is deleted because if you use the word "for free", the perception arises that there are documents provided in paid.
28	1.1.1	Propose on indicator 1.1.1 Deleted the word "for free" so that there is no perception of documents provided accessed in paid
29	1.1.1	"1.1.1: The word ""free"" is deleted because it is said for free, the perception arises that there is a document which is provided in paid."
30	1.1.1	"Proposed 1.1.1: Deleted the word in indicator 1.1.1 ""for free"" because if it is said for free, it shows that in the provisions of the RSPO there are documents provided in paid"
31	1.1.1	Indicator 1.1.1 - Proposed: Deleted the word "for free" because if it is said for free, the perception arises that there are documents provided in paid
32	1.1.1	"Proposed 1.1.1 The word ""free"" is deleted because if it is said for free, the perception arises that there are documents provided in paid"
33	1.1.1	Proposed: Deleted the word "for free" because if it is said for free, the perception arises that there are documents provided in paid. So that the sentence becomes "1.1.1 (c) Except for confidential information, the management documents specified in the P&C RSPO are provided for the public in the language as it should".
34	1.1.1	Deleted the word "for free" because if it is said for free, the perception arises that there are documents provided in paid
35	1.1.2	1.1.2. Records of identified stakeholders with their nominated representatives; requests for information by stakeholders and responses to requests shall be maintained and made available by the Unit of Certification with the prior agreement, information and consent of these stakeholders
36	1.1.2	1.1.2. Records of identified stakeholders with their nominated representatives; requests for information by stakeholders and responses to requests shall be maintained and made available by the Unit of Certification with the prior agreement, information and consent of these stakeholders

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37	1.1.2	"1.1.2. Records of identified stakeholders with their nominated representatives; requests for information by stakeholders and responses to requests shall be maintained and made available by the Unit of Certification with the prior agreement, information and consent of these stakeholders"
38	1.1.2	1.1.2. Records of identified stakeholders with their nominated representatives; requests for information by stakeholders and responses to requests shall be maintained and made available by the Unit of Certification with the prior agreement, information and consent of these stakeholders
39	1.1.2	proposed to change "...nominated representatives" to "nominated representatives (if any)", as not all stakeholders have this
40	1.1.2	"1.1.2: After the sentence ""along with its representatives appointed ""added"" if there is ""because not all Stakeholders pointed to their representatives."
41	1.1.2	The word "along with" changed to "or"
42	1.1.2	"Indicator 1.1.2 Proposed: The word ""along with"" changed to ""or"""
43	1.1.2	"Proposal: The word ""along with"" changed to ""or"""
44	1.1.2	"Proposal: The word ""along with"" changed to ""or"""
45	1.1.2	Proposed Indicator 1.1.2: Changing the word "along with" to "or"
46	1.1.2	1.1.2: After the phrase "along with the appointed representative" added "if there is" because not all stakeholders pointed to their representatives.
47	1.1.2	1.1.2 - the word "along with" changed to "or"
48	1.1.2	Indicator 1.1.2 (c) proposed to: the word "along with" changed to "or" so that the sentence becomes "notes about identified stakeholders or appointed representatives; requests for information by stakeholders; and responses to the request must be managed."
49	1.1.2	Proposed improvement in indicators 1.1.2 Words along with replaced "or", because not all revolutions with their representatives.
50	1.1.2	"Comment: The word ""along with"" changed to ""or"" Proposed changes: 1.1.2 (c) Note about identified stakeholders or designated representatives; request for information by stakeholders; and responses to these requests must be managed."

#	Indicator	Comment (English)
51	1.1.2	"The word ""along with"" changed to ""or"" Note about identified stakeholders or designated representatives; request for information by stakeholders; and responses to these requests must be managed."
52	1.1.2	Indicator 1.1.2 (c) needs to replace the word "along with" to "or" so that the sentence reads "notes about identified stakeholders or appointed representatives; requests for information by stakeholders; and responses to the request must be managed".
53	1.1.2	Propose on indicator 1.1.2 The word "along with" changed to "or"
54	1.1.2	The word "along with" being "or" so that the indicator 1.1.2 (c) The sentence becomes: Note about the identified stakeholders or appointed representatives; request for information by stakeholders; and responses to these requests must be managed.
55	1.1.2	Proposed Indicator 1.1.2: Changing the word "along with" to "or"
56	1.1.3	Communication - wrong spelling.
57	1.1.3	"A system is in place to monitor compliance with and implementation of the policy and ethical business practices in general - based on guidelines published by the RSPO, the result of a multi-stakeholder effort to agree on the criteria to be audited."
58	1.2	1.2. The certification unit undertakes to respect ethical practices in all its operations and business transactions, based on objective, verifiable criteria.
59	1.2	"Working Animal Rights - Comments The rights of working animals such as buffalo, donkey, horse etc.is an issue that has not been raised yet by the RSPO standards though working animals play an important role in the production of palm oil. Any animal is subject to rights under the regulations in the different countries, evidence from palm oil producers showed that these animals do not have neither an adequate medical record, nor identity [age, history, origin etc.], nor are they subject to standard operating procedures that reflect the animals complete life history. What is the RSPO position/requirements on animal protection as these animals are workers of the companies that produce oil palm. >Suggest RSPO to take into account the working animals and its associated procedures/requirements, its related topics such as animal health, smallholder support etc."
60	1.2	This is a 'feel-good' criterion. The indicator focuses on just policy and procedure and not implementation or actual commitment. Be realistic, it should be framed in a way that certificate holders, and members, recognise the magnitude of this problem especially in Asia.
61	1.2	1.2. The certification unit undertakes to respect ethical practices in all its operations and business transactions, based on objective, verifiable criteria.
62	1.2	The certification unit undertakes to respect ethical practices in all its operations and business transactions, based on objective, verifiable criteria.

#	Indicator	Comment (English)
63	1.2	"1.2. The certification unit undertakes to respect ethical practices in all its operations and business transactions, based on objective, verifiable criteria."
64	1.2	The certification unit undertakes to respect ethical practices in all its operations and business transactions, based on objective, verifiable criteria.
65	1.2	1.2. The certification unit undertakes to respect ethical practices in all its operations and business transactions, based on objective, verifiable criteria.
66	1.2	The certification unit undertakes to respect ethical practices in all its operations and business transactions, based on objective, verifiable criteria.
67	1.2	1.2. The certification unit undertakes to respect ethical practices in all its operations and business transactions, based on objective, verifiable criteria.
68	1.2	1.2. The certification unit undertakes to respect ethical practices in all its operations and business transactions, based on objective, verifiable criteria.
69	1.2	1.2. The certification unit undertakes to respect ethical practices in all its operations and business transactions, based on objective, verifiable criteria.
70	1.2	1.2. The certification unit undertakes to respect ethical practices in all its operations and business transactions, based on objective, verifiable criteria.
71	1.2	The certification unit undertakes to respect ethical practices in all its operations and business transactions, based on objective, verifiable criteria.
72	1.2.1	"(C) -> (c) please note that the system of dote point should remain consistent. e.g. 6.2.9 use "" a. "" 6.2.1 use "" a) "" 6.7.1 use "" (a) "" 6.7.3 use (i) while there is no ""a) after the (i) "
73	1.2.1	A policy of ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts - in accordance with objective international and/or national benchmarks, in agreement with external civil society stakeholders. The RSPO can set up upstream multi-stakeholder workshops to agree on the criteria and thresholds to be followed, depending on the type of player and geographical area.

#	Indicator	Comment (English)
74	1.2.1	A policy of ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts - in accordance with objective international and/or national benchmarks, in agreement with external civil society stakeholders. The RSPO can set up upstream multi-stakeholder workshops to agree on the criteria and thresholds to be followed, depending on the type of player and geographical area.
75	1.2.1	A policy of ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts - in accordance with objective international and/or national benchmarks, in agreement with external civil society stakeholders. The RSPO can set up upstream multi-stakeholder workshops to agree on the criteria and thresholds to be followed, depending on the type of player and geographical area. A system is in place to monitor compliance with and implementation of the policy and ethical business practices in general - based on guidelines published by the RSPO, the result of a multi-stakeholder effort to agree on the criteria to be audited.
76	1.2.1	"A policy of ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts - in accordance with objective international and/or national benchmarks, in agreement with external civil society stakeholders. The RSPO can set up upstream multi-stakeholder workshops to agree on the criteria and thresholds to be followed, depending on the type of player and geographical area."
77	1.2.1	A policy of ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts - in accordance with objective international and/or national benchmarks, in agreement with external civil society stakeholders. The RSPO can set up upstream multi-stakeholder workshops to agree on the criteria and thresholds to be followed, depending on the type of player and geographical area.
78	1.2.1	A policy of ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts - in accordance with objective international and/or national benchmarks, in agreement with external civil society stakeholders. The RSPO can set up upstream multi-stakeholder workshops to agree on the criteria and thresholds to be followed, depending on the type of player and geographical area.
79	1.2.1	add definition of "corruption, bribery"
80	1.2.1	A policy of ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts - in accordance with objective international and/or national benchmarks, in agreement with external civil society stakeholders. The RSPO can set up upstream multi-stakeholder workshops to agree on the criteria and thresholds to be followed, depending on the type of player and geographical area.
81	1.2.1	A policy of ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts - in accordance with objective international and/or national benchmarks, in agreement with external civil society stakeholders. The RSPO can set up upstream multi-stakeholder workshops to agree on the criteria and thresholds to be followed, depending on the type of player and geographical area.

#	Indicator	Comment (English)
82	1.2.1	A policy of ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts - in accordance with objective international and/or national benchmarks, in agreement with external civil society stakeholders. The RSPO can set up upstream multi-stakeholder workshops to agree on the criteria and thresholds to be followed, depending on the type of player and geographical area. A system is in place to monitor compliance with and implementation of the policy and ethical business practices in general - based on guidelines published by the RSPO, the result of a multi-stakeholder effort to agree on the criteria to be audited.
83	1.2.1	"A policy of ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts - in accordance with objective international and/or national benchmarks, in agreement with external civil society stakeholders. The RSPO can set up upstream multi-stakeholder workshops to agree on the criteria and thresholds to be followed, depending on the type of player and geographical area. A system is in place to monitor compliance with and implementation of the policy and ethical business practices in general - based on guidelines published by the RSPO, the result of a multi-stakeholder effort to agree on the criteria to be audited." "
84	1.2.1	1.2.1 (c) this is not clear what is expected
85	1.2.1	"Proposed Indicator 1.2.1: 1. When compared to the English version of the translation is not right, usual in point A becomes a fair business policy 2. What is meant by reasonable business behavior? In our opinion this does not need to be included because this is something normal 3. It is necessary to clarify information in point C"
86	1.2.1	"1. When compared to the English version of the translation is not right, usual in point A becomes a fair business policy 2. What is meant by reasonable business behavior? In our opinion this does not need to be included because this is something normal 3. It is necessary to clarify information in point C"
87	1.2.1	"Comment: 1. When compared to the English version of the translation is not right. 2. What is meant by reasonable business behavior? In our opinion this does not need to be included because this is something normal. Proposal to point (a): Respect a fair business policy 3. Point C is unclear, especially the information in question. Should be deleted"
88	1.2.1	Proposed 1.2.1 Improvement of appreciation translation is "respect" because the English version respect.

#	Indicator	Comment (English)
89	1.2.1	"Proposed changes: 1. When compared to the English version, the translation is not right, the proposal to the ""Point A"" translation is changed to ""Respect Fair Business Policy"" 2. What is meant by reasonable business behavior? In our opinion this does not need to be included because this is something normal 3. It is necessary to clarify what is meant by information in point C"
90	1.2.1	1.2.1 Details regarding the contents of the Code of Ethics policy should not be raised in the indicator but described in the guide
91	1.2.1	1.2.1 - When compared to the English version of the translation, the proposal in point a.) Becomes respect for a fair business policy
92	1.2.1	"Proposal: 1. When compared to the English version of the translation is not right, the proposal on point A becomes a fair business policy 2. What is meant by reasonable business behavior? In our opinion this does not need to be included because this is something normal 3. It is necessary to clarify information in point C"
93	1.2.1	"Indicator 1.2.1 is proposed to: 1. When compared to the English version of the translation is not right, usual in point A becomes a fair business policy. 2. What is meant by reasonable business behavior? In our opinion this does not need to be included because this is something normal 3. It is necessary to clarify information in point C"
94	1.2.1	1.2.1 - Need to clarify information on point C
95	1.2.1	"1.2.1: Words in points (b) ""abuse of resources"" deleted because in addition to opening different interpretations it is also subjective. P&C should not make milli-interpretation and subjective things. When The company allows the community to use land For non -palm oil plants, part of the comdev, whether it is 'abuse'? If there are big activities in the district, Then the local government asks to be supported by an ambulance or bus School of company, is that 'abuse'?"
96	1.2.1	"1.2.1: Check the translation again about the fragrant. (b) a prohibition of all forms of corruption, bribery and Fragrant Use of Funds and Resources; (b) Prohibition of all forms of corruption, bribery, and embezzlement of money and abuse of resources"

#	Indicator	Comment (English)
97	1.2.1	"Proposal: 1. When compared to the English version of the translation is not right, usual in point A becomes a fair business policy 2. What is meant by reasonable business behavior? In our opinion this does not need to be included because this is something normal 3. It is necessary to clarify information on points"
98	1.2.1	"Proposed changes: 1. There is a difference in scent when compared to the English version, its proposal to the ""point A"" translation is changed to ""Respect Fair Business Policy"" 2. What is meant by reasonable business behavior? A reasonable business behavior should be removed because it is something that has been running properly. 3. It is necessary to describe in more detail what is meant by information in point C"
99	1.2.1	"1. When compared to the English version of the translation is not right, usual in point A becomes a fair business policy"
100	1.2.1	"Proposed Indicator 1.2.1: 1. When compared to the English version of the translation is not right, usual in point A becomes a fair business policy 2. What is meant by reasonable business behavior? In our opinion this does not need to be included because this is something normal 3. It is necessary to clarify information in point C"
101	1.2.1	"1.2.1: The word in point (b) ""abuse of resources"" is deleted because in addition to opening different interpretations is also subjective. P&C should not make a multi-interpretation and things that are subjective. If the company allows people to use land for non -palm oil plants, part of Comdev, is that 'abuse'? If there are major activities in the district, then the local government asks to be supported by the company's ambulance or school buses, is that 'abuse'?"
102	1.2.1	Propose on indicator 1.2.1, namely improving language translation in the word appreciation to "respect" because in the English version in the form of the word "respect".
103	1.2.1	2. What is meant by reasonable business behavior? In our opinion this does not need to be included because this is something normal
104	1.2.1	Comments: 1. When compared to the English version of the translation is not right. 2. What is meant by reasonable business behavior? In our opinion this does not need to be included because this is something normal. Proposal on point (a): Respect fair business policy 3. Point C is unclear, especially the information in question. Should be deleted
105	1.2.1	point A is changed to respect the fair business policy
106	1.2.1	"1.2.1: Check the translation again about the fragrant. (b) a prohibition of all forms of corruption, bribery and fragitenit use of funds and resources; (b) prohibition of all forms of corruption, bribery, and embezzlement of money and abuse of resources;"

#	Indicator	Comment (English)
107	1.2.2	A system is in place to monitor compliance with and implementation of the policy and ethical business practices in general - based on guidelines published by the RSPO, the result of a multi-stakeholder effort to agree on the criteria to be audited.
108	1.2.2	A system is in place to monitor compliance with and implementation of the policy and ethical business practices in general - based on guidelines published by the RSPO, the result of a multi-stakeholder effort to agree on the criteria to be audited.
109	1.2.2	A policy of ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts - in accordance with objective international and/or national benchmarks, in agreement with external civil society stakeholders. The RSPO can set up upstream multi-stakeholder workshops to agree on the criteria and thresholds to be followed, depending on the type of player and geographical area.
110	1.2.2	A system is in place to monitor compliance with and implementation of the policy and ethical business practices in general - based on guidelines published by the RSPO, the result of a multi-stakeholder effort to agree on the criteria to be audited.
111	1.2.2	A system is in place to monitor compliance with and implementation of the policy and ethical business practices in general - based on guidelines published by the RSPO, the result of a multi-stakeholder effort to agree on the criteria to be audited.
112	1.2.2	A system is in place to monitor compliance with and implementation of the policy and ethical business practices in general - based on guidelines published by the RSPO, the result of a multi-stakeholder effort to agree on the criteria to be audited.
113	1.2.2	A system is in place to monitor compliance with and implementation of the policy and ethical business practices in general - based on guidelines published by the RSPO, the result of a multi-stakeholder effort to agree on the criteria to be audited.
114	1.2.2	A system is in place to monitor compliance with and implementation of the policy and ethical business practices in general - based on guidelines published by the RSPO, the result of a multi-stakeholder effort to agree on the criteria to be audited.
115	1.2.2	"1.2.2: The indicator is changed to; ""1.2.2 Procedure Risk Prevention and Management of Code of Ethics Violation must be arranged and implemented. There must be evidence shows that workers know the existence of the code of ethics "" "
116	1.2.2	"1.2.2 This indicator is proposed to change to: The certification unit must show that the implementation of the code of ethics policy is going well based on evidence of the implementation of work procedures in the related operational department Consideration: If work procedures are implemented properly, it can be ascertained that the application of the code of ethics has also been running, including the implementation of internal audit procedures that also control the implementation of the work procedures. So there is no need for procedures regarding the violation of the code of ethics "

#	Indicator	Comment (English)
117	1.2.2	"Proposal: Delete the word ""all potential"" because it cannot be said to be a violation"
118	1.2.2	1.2.2: The word "all potential" is removed because the potential for violations is very multi-interpretation and cannot be said to be a violation.
119	1.2.2	"Delete the word ""all potential"" because it cannot be said to be a violation Procedure for managing the violation of the Code of Ethics must be prepared and implemented. There must be evidence that indicates that workers know the code of ethics."
120	1.2.2	Indicator 1.2.2 is proposed to: The word "all potential" is removed because it cannot be said as a violation.
121	1.2.2	Proposal 1.2.2 Improvement to remove the word all potential because it creates a broad interpretation of not being able to auditability and cannot be said to be a violation
122	1.2.2	"Comment: Delete the word potential because it cannot be said as a violation Proposed changes: 1.2.2 Procedure for Management of Violations of the Code of Ethics must be prepared and implemented. There must be evidence that indicates that workers know the code of ethics."
123	1.2.2	"Proposed Indicator 1.2.2: Delete the word ""all potential"" because it cannot be said to be a violation"
124	1.2.2	"1.2.2: The word ""all potential"" is removed because of potential Violations are very multi-interpretation and cannot be said as a violation."
125	1.2.2	In indicators 1.2.2 The word "all potential" has a broad meaning and diverse interpretation, this can cause something that is biased and vague and tends to be subjective because the potential cannot be said as a violation so that we propose to be removed.
126	1.2.2	Proposed: removing the word " all potential "because the potential cannot be said as a violation, so the sentence becomes: 1.2.2 Procedure for Management of Violations Code of Ethics must be prepared and implemented. There must be evidence that shows that workers know the existence of the code of ethics.
127	1.2.2	1.2.2 - Remove the word " all potential "because it cannot be said as a violation
128	1.2.2	Proposed 1.2.2 The word "all potential" should be removed because it causes broad interpretation
129	1.2.2	"Proposal: Delete the word ""all potential"" because it cannot be said to be a violation"

#	Indicator	Comment (English)
130	1.2.2	"Proposed Indicator 1.2.2: Delete the word ""all potential"" because it cannot be said to be a violation"
131	1.2.2	Proposed 1.2.2: Remove the word "all potential" because it cannot be said as a violation
132	1.2.2	Proposed Indicator 1.2.2: Removing the word "all potential" because it cannot be said as a violation

#	Indicator	Comment (English)
1	2.1	2.1 There is compliance with all applicable local, national, and ratified international laws and regulations.by always referring to the most demanding laws in terms of respect for human rights.
2	2.1	There is compliance with all applicable local, national, and ratified international laws and regulations.by always referring to the most demanding laws in terms of respect for human rights.
3	2.1	"2.1 There is compliance with all applicable local, national, and ratified international laws and regulations.by always referring to the most demanding laws in terms of respect for human rights."
4	2.1	2.1 There is compliance with all applicable local, national, and ratified international laws and regulations.by always referring to the most demanding laws in terms of respect for human rights.
5	2.1	Correction of translation in criteria 2.1 points (a) all laws and regulations, including but not limited to: regulations governing land rights and land use rights, customary law, labor, agricultural practices (for example, the use of chemicals), the environment (for example, Law on Protection of Wildlife, Pollution), Storage, Transportation, and Processing Practices.
6	2.1	"This note section to be deleted because: <ul style="list-style-type: none"> • Indonesia has many regulations according to its level (Law to Ministerial Regulation). National interpretation will have difficulty identifying it. • There are different regional regulations according to each location • The dynamics of laws and regulations in Indonesia are very high (especially the addition of legislation) • All certification units have identified related legislation requirements in their respective locations. "
7	2.1.1	Isn't this a bit vague? Could an auditor construe "legal requirements" to only refer to domestic laws and inadvertently fail to recognise the need to comply with ratified international obligations? There is a danger here unless it is spelt out.
8	2.1.1	"2.1.1: At the end of the sentence the word ""applies"" is added The English version is 2.1.1 (c) The Unit of Certification Complies with Applicable Legal Requirements."
9	2.1.1	Proposal to add words that "apply"
10	2.1.1	2.1.1: At the end of the sentence the word "applies" according to the English version is 2.1.1 (c) The Unit of Certification Complies with Applicable Legal Requirements.
11	2.1.1	incomplete verse - add "applies" to the verse to match the English version
12	2.1.1	Define whether the scope of "ratified international regulations" includes compliance with international directives such as the new deforestation regulation of the European Union.
13	2.1.1	Define whether the scope of "ratified international regulations" includes compliance with international directives such as the new deforestation regulation of the European Union.

#	Indicator	Comment (English)
14	2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors. This documentation shall remain available for consultation upon request by defined and relevant stakeholders for ensuring legal compliance is in place.
15	2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors. This documentation shall remain available for consultation upon request by defined and relevant stakeholders for ensuring legal compliance is in place.
16	2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors. This documentation shall remain available for consultation upon request by defined and relevant stakeholders for ensuring legal compliance is in place.
17	2.1.2	add a definition or change "labour contractor" into "labour recruiters" ?
18	2.1.2	"table of definitions includes - contractor - labour contractor consider using terms in the definitions throughout and consistently"
19	2.1.2	"A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors. This documentation shall remain available for consultation upon request by defined and relevant stakeholders for ensuring legal compliance is in place."
20	2.1.2	There is no change with P&C 2018
21	2.1.2	The scope of due diligence at the legal level should be established, both in the front related to the issues of hiring, safety and health at work, environment, accounting and including at the money laundering level. The scope must be defined by the UDC, and that must be established in the standard to facilitate the audit.
22	2.1.2	In this requirement, there is currently subjectivity in audits, because although companies have defined their scope of due diligence, auditors from their experience ask that more requirements be controlled.
23	2.1.2	OK. It is necessary to be specific about what you want to prioritize.
24	2.1.2	Include that the scope of due diligence will be established by the UDC in accordance with the nature of the hired third party and the services provided to the UDC, since the due diligence made to the Internet service provider is not the same as the supplier than the supplier tank maintenance

#	Indicator	Comment (English)
25	2.1.3	Legal status, including occupancy and use rights, is clearly documented. Spatial boundaries are visibly delineated and maintained. Legal registration or written authorization from governmental authority(ies) must be available. This legal status must be validated by a third party, in agreement with the local population.
26	2.1.3	Legal status, including occupancy and use rights, is clearly documented. Spatial boundaries are visibly delineated and maintained. Legal registration or written authorization from governmental authority(ies) must be available. This legal status must be validated by a third party, in agreement with the local population.
27	2.1.3	Amend to "Legal boundaries should be demarcated on the ground and visibly maintained..."
28	2.1.3	Legal boundaries are much clearer term rather than spatial boundaries. Propose to stick with current term of "legal boundaries" that holds valid approval from the authority.
29	2.1.3	"Legal status, including occupancy and use rights, is clearly documented. Spatial boundaries are visibly delineated and maintained. Legal registration or written authorization from governmental authority(ies) must be available. This legal status must be validated by a third party, in agreement with the local population."
30	2.1.3	"2.1.3: The word ""spatial limit"" is changed to ""legal limit"" because the legal limit is declared by government agencies Clearly in the field such as a HGU stake."
31	2.1.3	Indicator 2.1.3 (c) Proposed to: The sentence "Legal registration document or written authorization of the authorized government institution must be available" deleted because it has been included in the initial sentence.
32	2.1.3	"For the phrase ""legal registration document or written authorization from the authorized government institution must be available"" to be removed because it has been covered in the initial sentence Become 2.1.3 (c) Documenting legal status clearly, including user control and rights. The spatial limit is determined and maintained so that it remains clearly visible."
33	2.1.3	For indicators 2.1.3 In the sentence "Legal registration document or written authorization from the authorized government institution must be available" proposed to be deleted because the sentence has been included in the beginning so that it can be said to be repetition of meaning.
34	2.1.3	"Proposal: For the phrase ""legal registration document or written authorization from the authorized government institution must be available"" to be removed because it has been covered in the initial sentence"

#	Indicator	Comment (English)
35	2.1.3	"Proposed Indicator 2.1.3: For spatial boundary sentences corrected into boundary sentences according to the law. The phrase ""Legal registration documents or written authorization from the authorized government institution must be available"" only deleted because the documentation of legal status and its mastery have been included."
36	2.1.3	Proposed: For the phrase "Legal registration documents or written authorization from the authorized government institution must be available" to be deleted because it has been covered in the initial sentence.
37	2.1.3	"Proposed Indicator 2.1.3: For the phrase ""legal registration document or written authorization from the authorized government institution must be available"" to be removed because it has been covered in the initial sentence"
38	2.1.3	"Proposal: For the phrase ""legal registration document or written authorization from the authorized government institution must be available"" to be removed because it has been covered in the initial sentence"
39	2.1.3	Proposed indicator 2.1.3: There is a repetition of sentences in this indicator. For the phrase "legal registration document or written authorization from the authorized government institution must be available" it is recommended to be deleted because it has been covered in the initial sentence
40	2.1.3	2.1.3: The word "spatial limit" is changed to "legal limit" because the legal limit is clearly declared by government institutions in the field such as HGU stakes.
41	2.1.3	the sentence "legal registration documents or written authorization from the authorized government institution must be available" just deleted because it has been covered in the initial sentence
42	2.1.3	"Comment: For the phrase ""legal registration document or written authorization from the authorized government institution must be available"" to be removed because it has been covered in the initial sentence Proposed changes: 2.1.3 (c) Documenting legal status clearly, including user control and rights. The spatial limit is determined and maintained so that it remains clearly visible."
43	2.1.3	"1. Replace the ""spatial limit"" with the ""legal limit"" that is the boundary stated by the government in the field is the HGU stake 2. The last sentence ""Legal registration document or written authorization from an authorized government institution must be available"" is redundant because it has been stated in the first sentence"

#	Indicator	Comment (English)
44	2.1.3	"Indicator 2.1.3 Proposed: For the phrase ""legal registration document or written authorization from the authorized government institution must be available"" to be removed because it has been covered in the initial sentence"
45	2.1.3	"Proposal: For the phrase ""Legal registration documents or written authorization from the authorized government institution must be available"" to be deleted because it has been covered in the initial sentence."
46	2.1.3	2.1.3 - For the phrase "Legal registration document or written authorization from the authorized government institution must be available" to be removed because it has been covered in the initial sentence
47	2.1.3	"2.1.3 The sentence ""legal registration document or Written authorization of authorized government institutions must be available ""to be deleted because it has been covered at the initial sentence so that it is reduced."
48	2.1.3	2.1.3 Sentence "Legal registration document or written authorization from the authorized government institution must be available" to be removed because it has been covered in the initial sentence so that it is reduced.
49	2.1.3	2.1.3 Need further explanation, what is meant by "legal registration documents or written authorization from the authorized government institution must be available"
50	2.2	2.2 The Unit of Certification commits to contract or engage ONLY legal contractors and FFB suppliers
51	2.2	Please define what is meant by legal contractors in the Definition Section.
52	2.2	2.2 The Unit of Certification commits to contract or engage ONLY legal contractors and FFB suppliers
53	2.2	"2.2 The Unit of Certification commits to contract or engage ONLY legal contractors and FFB suppliers"
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58	2.2	2.2 The Unit of Certification commits to contract or engage ONLY legal contractors and FFB suppliers
59	2.2	The Unit of Certification commits to contract or engage ONLY legal contractors and FFB suppliers
60	2.2	2.2 The Unit of Certification commits to contract or engage ONLY legal contractors and FFB suppliers
61	2.2	The Unit of Certification commits to contract or engage ONLY legal contractors and FFB suppliers
62	2.2	2.2 The Unit of Certification commits to contract or engage ONLY legal contractors and FFB suppliers
63	2.2	[Accra WS] 2.2 NI process should define what is legal based on national regulation. How to include 'legitimacy' land use rights.
64	2.2.1	"The list of contracted parties should cover all growers, MB certified or not"
65	2.2.1	The list of contracted parties should cover all growers, MB certified or not
66	2.2.1	MB mills should ensure legality of contracted parties through ISPO and MSPO certification documents

#	Indicator	Comment (English)
67	2.2.1	MB mills should ensure legality of contracted parties through ISPO and MSPO certification documents
68	2.2.1	The list of contracted parties should cover all growers, MB certified or not
69	2.2.1	The list of contracted parties should cover all growers, MB certified or not
70	2.2.1	MB mills should ensure legality of contracted parties through ISPO and MSPO certification documents
71	2.2.1	This should be specific to say "...legal contracted parties..."
72	2.2.1	The list of contracted parties should cover all growers, MB certified or not
73	2.2.1	"2.2.1: At the end of the sentence added ""if needed"" because the involvement of the contractor is not mandatory and only if needed. 2.2.1: The Unit of Certification Shall Engage Legal Contractors (IF Needed)."
74	2.2.1	2.2.1: At the end of the sentence added "if needed" because the involvement of the contractor is not mandatory and only if needed. 2.2.1: The Unit of Certification Shall Engage Legal Contractors (IF Needed).
75	2.2.2	The verification of legality of contracted parties should be updated regularly
76	2.2.2	"MB mills should ensure legality of contracted parties through ISPO and MSPO certification documents"
77	2.2.2	"MB mills should ensure legality of contracted parties through ISPO and MSPO certification documents."
78	2.2.2	The verification of legality of contracted parties should be updated regularly
79	2.2.2	What is meant by legal requirements?
80	2.2.2	The verification of legality of contracted parties should be updated regularly
81	2.2.2	"The verification of legality of contracted parties should be updated regularly"
82	2.2.3	How is this indicator auditable, especially for FFB suppliers and transport contractors? Are the auditors now expected to visit these FFB supplier sites?
83	2.2.3	"MB mills should ensure legality of contracted parties through ISPO and MSPO certification documents"
84	2.2.3	MB mills should ensure legality of contracted parties through ISPO and MSPO certification documents
85	2.2.3	the recruitment fees should only based on the statutory fees. Others non-documented cost should not bare by the company as is only from verbally by workers and unable to verify the source.
86	2.2.3	MB mills should ensure legality of contracted parties through ISPO and MSPO certification documents
87	2.2.3	MB mills should ensure legality of contracted parties through ISPO and MSPO certification documents
88	2.2.3	MB mills should ensure legality of contracted parties through ISPO and MSPO certification documents
89	2.2.3	Legal status, including occupancy and use rights, is clearly documented. Spatial boundaries are visibly delineated and maintained. Legal registration or written authorization from governmental authority(ies) must be available. This legal status must be validated by a third party, in agreement with the local population.
90	2.2.3	MB mills should ensure legality of contracted parties through ISPO and MSPO certification documents

#	Indicator	Comment (English)
91	2.2.3	MB mills should ensure legality of contracted parties through ISPO and MSPO certification documents
92	2.2.3	No worker below 18 years - stating it is a young worker below 18 years would be redundant
93	2.2.3	young worker is defined to min under 18 in defentions already. why make explicit here?
94	2.2.3	2.2.3 The part stating "payment of recruitment costs and other related costs" to be removed because it raises various interpretations of what is meant by other related costs. Please also consider that third parties also have their own mechanisms in the recruitment of their employees as needed and cannot be intervened by the certification unit. Even if there are other related costs that violate the laws and regulations, it has been regulated in a contract where one of the requirements clauses is that the third party must comply with laws and regulations
95	2.3	2.3 The Unit of Certification shall source fresh fruit bunch (FFB) ONLY from legal supplier (s).
96	2.3	2.3 The Unit of Certification shall source fresh fruit bunch (FFB) ONLY from legal supplier (s).
97	2.3	"2.3 The Unit of Certification shall source fresh fruit bunch (FFB) ONLY from legal supplier (s)."
98	2.3	The Unit of Certification shall source fresh fruit bunch (FFB) ONLY from legal supplier (s).
99	2.3	2.3 The Unit of Certification shall source fresh fruit bunch (FFB) ONLY from legal supplier (s).
100	2.3	"This whole principle would benefit from being more linked with EUDR requirements and consideration should be given to the recommendations from the EUDR gap analysis report RSPO commissioned, including these: <ul style="list-style-type: none"> • Geo-location requirements of polygon should be added to bring it in line with the EUDR for plots above 4 hectares; • Definition of "FFB origin" should be added and aligned with EUDR definitions of "plot of land"; • Special attention should be given to "an extension of land within a single real-estate property"; • The transition period for mills going for the first year of certification to collect smallholder geolocations should be deleted."
101	2.3	2.3 The Unit of Certification shall source fresh fruit bunch (FFB) ONLY from legal supplier (s).

#	Indicator	Comment (English)
102	2.3	<p>"Criteria 2.3:</p> <p>EUDR: Suggest to include a separate add-on module for RSPO CSPO volumes for sale to the EU:</p> <ul style="list-style-type: none"> >Integration of the EUDR traceability requirements: geolocation (plots over 4 ha, definition of FFB origin to be added & aligned with EUDR definition of plot of land etc.), legality according to the laws of producer country inc. env. human and labour rights and FPIC (to be transferred through supply chain), requirements for the non-certified source for MB supply (Due diligence on no deforestation, legality and geolocation) >>Extend the RSPO's IT traceability system i.e. Palmtrace to include EUDR requirements (geo-location, deforestation, legality) to be uploaded by mills and transferred through supply chain. >>Develop an EUDR information system for all material, certified and conventional, within the mass balance supply >>Support independent smallholders to gather the geolocation data >Suggest to have a clear ToR and timeline for the taskforce for developing this procedure involving CBs and producers in various countries (SEA, Latam, Africa): guidance for certificate holder, guidance for auditors. <p>For RSPO P&C (i.e. not for the EUDR add-on module) and specifically for indirect FFB origins: Develop a risk-based approach for traceability, with (more generous) timebound plan to map indirect suppliers, and recognition of engagement in JA initiatives.</p> <p>[Traceability:</p> <ul style="list-style-type: none"> >Implementation procedure for 2.3.2: mills have 3 years to get this data from their third party suppliers, namely their collection centres, agents and everybody else to get the geolocation of the FFB origins. This is very challenging for mills. >Buying indirect FFB volumes from collection centres or any intermediaries adds another layer of complexity and risk i.e. risk of mixing products deriving from areas with various env. and soc. Issues. The collaboration with the collection centres remains challenging because of the typical existence of multiple layers of traders involved. >There are competition amongst the mills, the plantations (certified and non-certified), agents which impacts the behaviour of the indirect suppliers. Therefore, they would not want to disclose the location of FFB origins to the mills because they fear the company would buy directly from the smallholders. >Regarding the 3-year timeframe. where companies have to collect this information, the issue is that indirect suppliers are not bound by long term contract with the company depending on their supplies. Therefore, having the static 3 -year period to get information may not be realistic Company would probably look at having a time frame of 1-year after onboarding an agent/middle/ 3rd party to collect the information of their supplies. > There are challenges for companies/RSPO members to gather the geolocation data because company may require more resources such as hiring dedicated staff to focus on this task. >How does the current RSPO system (Palmtrace) for traceability relate to EUDR? <p>>Dropped from Draft1 is the PROCEDURAL NOTE 'A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator'.]</p> <p>"</p>

#	Indicator	Comment (English)
103	2.3	2.3 The Unit of Certification shall source fresh fruit bunch (FFB) ONLY from legal supplier (s).
104	2.3	The Unit of Certification shall source fresh fruit bunch (FFB) ONLY from legal supplier (s).
105	2.3	2.3 The Unit of Certification shall source fresh fruit bunch (FFB) ONLY from legal supplier (s).
106	2.3	The Unit of Certification shall source fresh fruit bunch (FFB) ONLY from legal supplier (s).
107	2.3	2.3 The Unit of Certification shall source fresh fruit bunch (FFB) ONLY from legal supplier (s).
108	2.3	<p>"EU Deforestation Regulation (EUDR) requirements – Comments</p> <p>In addition to continued engagement efforts with the EU to aid the recognition of RSPO's solid deforestation approach that includes use of HCV/HCS assessments, we strongly urge RSPO to develop a modular approach for the P&C that will retain the strong RSPO base certification, but allows for those growers who wish to sell EUDR-compliant volumes to the EU, to obtain an additional compliance check via a separate module. This will ensure continued relevance of RSPO certification as it will aide implementation of a legal requirement applicable to RSPO's SC members (retailers, CGMs, traders).</p> <p>This module could be classified as 'interim' until more clarity is provided by EU or their own revision process further finetunes the EUDR.</p> <p>Sourcing RSPO CSPO as part of a downstream companies due diligence approach to demonstrate compliance with EUDR will require the following:</p> <ul style="list-style-type: none"> > geo-location data needs to be defined in line with EUDR >Deforestation (cut-off date, definition of forest as per FAO, exemption for High Forest Cover Landscapes Countries (RSPO) vs non exemption (EUDR), check RaCP cut-off dates and align > check coverage of all legality aspects listed under EUDR and develop indicators where needed (e.g. on tax compliance) <p>"</p>
109	2.3	2.3 The Unit of Certification shall source fresh fruit bunch (FFB) ONLY from legal supplier (s).
110	2.3	[Jakarta WS] 2.3 a proposal for UoC to conduct 'risk assessment' of all direct and indirect FFB supplier - with mitigation plan?
111	2.3	<p>"[Abidjan WS] 2.3 Criteria and indicator level - concerns over the interpretation of 'legal status' - as being the land titles and there is lack of recognition of 'legitimate land rights'.</p> <p>Proposed to indicate for National Interpretation to clearly provide guidance on how legitimate land rights or user rights are recognised - not just land titles. "</p>

#	Indicator	Comment (English)
112	2.3.1	<p>"For all Fresh Fruit Bunch (FFB), the Unit of Certification sourced through traders (dealers, collection centers), information listed below shall be obtained:</p> <ul style="list-style-type: none"> i) Geolocation of FFB origins; ii) Proof of the ownership, customary rights or other land user rights to the land by the farmers; iii) Where applicable, valid planting/ operating/trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>Procedural note: A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process</p> <p>"And would require growers" > And would require growers and mills</p> <p>Geolocation:</p> <ul style="list-style-type: none"> > Using the GeoRSPO platform > Using national traceability initiatives, such as the Malaysia Palm Oil Board <p>Legality:</p> <ul style="list-style-type: none"> > RSPO MB mills should ensure all suppliers, certified or not, are certified with national standards (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance"

#	Indicator	Comment (English)
113	2.3.1	<p>""For all Fresh Fruit Bunch (FFB), the Unit of Certification sourced through traders (dealers, collection centers), information listed below shall be obtained:</p> <ul style="list-style-type: none"> i) Geolocation of FFB origins; ii) Proof of the ownership, customary rights or other land user rights to the land by the farmers; iii) Where applicable, valid planting/ operating/ trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>Procedural note: A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process</p> <p>“And would require growers” > And would require growers and mills</p> <p>Geolocation:</p> <ul style="list-style-type: none"> > Using the GeoRSPO platform > Using national traceability initiatives, such as the Malaysia Palm Oil Board <p>Legality:</p> <ul style="list-style-type: none"> > RSPO MB mills should ensure all suppliers, certified or not, are certified with national standards (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance"" <p>"</p>
114	2.3.1	Suggest to line this up more with new EUDR geolocation requirements for plots above 4 ha. Definition of FFB origin should be added and aligned with EUDR definitions of "plot of land."
115	2.3.1	[Accra WS] 2.3.1. and 2.3.2 - Ni should define the acceptable proof of ownership - to include some legitimate use rights, where there is no land title (official documentation).
116	2.3.1	"define what and how geo location parameters: polygon, 1 coordinate, above how much ha?. suggest to be in line with 4ha of EUDR. Keep in mind that this 4ha might be up for review in 5 years"

#	Indicator	Comment (English)
117	2.3.1	<p>""For all Fresh Fruit Bunch (FFB), the Unit of Certification sourced through traders (dealers, collection centers), information listed below shall be obtained:</p> <ul style="list-style-type: none"> i) Geolocation of FFB origins; ii) Proof of the ownership, customary rights or other land user rights to the land by the farmers; iii) Where applicable, valid planting/ operating/ trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>Procedural note: A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process</p> <p>“And would require growers” > And would require growers and mills</p> <p>Geolocation:</p> <ul style="list-style-type: none"> > Using the GeoRSPO platform > Using national traceability initiatives, such as the Malaysia Palm Oil Board <p>Legality:</p> <ul style="list-style-type: none"> > RSPO MB mills should ensure all suppliers, certified or not, are certified with national standards (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance""

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118	2.3.1	<p>""For all Fresh Fruit Bunch (FFB), the Unit of Certification sourced through traders (dealers, collection centers), information listed below shall be obtained:</p> <ul style="list-style-type: none"> i) Geolocation of FFB origins; ii) Proof of the ownership, customary rights or other land user rights to the land by the farmers; iii) Where applicable, valid planting/ operating/ trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>Procedural note: A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process</p> <p>“And would require growers” > And would require growers and mills</p> <p>Geolocation:</p> <ul style="list-style-type: none"> > Using the GeoRSPO platform > Using national traceability initiatives, such as the Malaysia Palm Oil Board <p>Legality:</p> <ul style="list-style-type: none"> > RSPO MB mills should ensure all suppliers, certified or not, are certified with national standards (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance""

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119	2.3.1	<p>"For all Fresh Fruit Bunch (FFB), the Unit of Certification sourced through traders (dealers, collection centers), information listed below shall be obtained:</p> <ul style="list-style-type: none"> i) Geolocation of FFB origins; ii) Proof of the ownership, customary rights or other land user rights to the land by the farmers; iii) Where applicable, valid planting/ operating/ trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>Procedural note: A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process</p> <p>"And would require growers" > And would require growers and mills</p> <p>Geolocation:</p> <ul style="list-style-type: none"> > Using the GeoRSPO platform > Using national traceability initiatives, such as the Malaysia Palm Oil Board <p>Legality:</p> <ul style="list-style-type: none"> > RSPO MB mills should ensure all suppliers, certified or not, are certified with national standards (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance"

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120	2.3.1	<p>""For all Fresh Fruit Bunch (FFB), the Unit of Certification sourced through traders (dealers, collection centers), information listed below shall be obtained:</p> <ul style="list-style-type: none"> i) Geolocation of FFB origins; ii) Proof of the ownership, customary rights or other land user rights to the land by the farmers; iii) Where applicable, valid planting/ operating/ trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>Procedural note: A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process</p> <p>“And would require growers” > And would require growers and mills</p> <p>Geolocation:</p> <ul style="list-style-type: none"> > Using the GeoRSPO platform > Using national traceability initiatives, such as the Malaysia Palm Oil Board <p>Legality:</p> <ul style="list-style-type: none"> > RSPO MB mills should ensure all suppliers, certified or not, are certified with national standards (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance"" <p>"</p>
121	2.3.1	<p>how do you define origin? a physically connected area owned by the supplier? What is one supplier has multiple scattered plots of land? Should he supply all specific geo location information?</p>
122	2.3.1	<p>[Accra WS] 2.3.1 for all directly sourced FFB - there should be a clear scope defined - what about those seasonal supplier (those SH only send once in a year) - does it mean geolocation and ownership documents required too? Also to provide a progressing collection of such information - to avoid a complete cut-off of FFB suppliers that information is not able to be collected within the timeframe, especially for a large database of suppliers.</p>
123	2.3.1	<p>"Is this part applicable here? Because when you buy FFB from 'a cooperative which allows the buying and selling of FFB' - so a trader, not somebody that produces FFB - you are not sourcing directly, but indirectly. Correct?"</p>

#	Indicator	Comment (English)
124	2.3.1	Suggest to highlight the context of current developments of EU deforestation legislation or various national due diligence legislation where legality may be defined more broadly [What FFB from legal suppliers entails in this indicator are origin/geolocation, ownership and license to operate. The indicator does not include the full legal compliance e.g. as required by criterion 2.1 on compliance with all applicable legal requirements such as regulations on labour, agricultural practices and the environment for the unit of certification].
125	2.3.1	<p>""For all Fresh Fruit Bunch (FFB), the Unit of Certification sourced through traders (dealers, collection centers), information listed below shall be obtained:</p> <ul style="list-style-type: none"> i) Geolocation of FFB origins; ii) Proof of the ownership, customary rights or other land user rights to the land by the farmers; iii) Where applicable, valid planting/ operating/trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>Procedural note: A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process</p> <p>“And would require growers” > And would require growers and mills</p> <p>Geolocation:</p> <ul style="list-style-type: none"> > Using the GeoRSPO platform > Using national traceability initiatives, such as the Malaysia Palm Oil Board <p>Legality:</p> <ul style="list-style-type: none"> > RSPO MB mills should ensure all suppliers, certified or not, are certified with national standards (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance""

#	Indicator	Comment (English)
126	2.3.1	<p>""For all Fresh Fruit Bunch (FFB), the Unit of Certification sourced through traders (dealers, collection centers), information listed below shall be obtained:</p> <ul style="list-style-type: none"> i) Geolocation of FFB origins; ii) Proof of the ownership, customary rights or other land user rights to the land by the farmers; iii) Where applicable, valid planting/ operating/ trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>Procedural note: A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process</p> <p>“And would require growers” > And would require growers and mills</p> <p>Geolocation:</p> <ul style="list-style-type: none"> > Using the GeoRSPO platform > Using national traceability initiatives, such as the Malaysia Palm Oil Board <p>Legality:</p> <ul style="list-style-type: none"> > RSPO MB mills should ensure all suppliers, certified or not, are certified with national standards (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance""

#	Indicator	Comment (English)
127	2.3.1	<p>""For all Fresh Fruit Bunch (FFB), the Unit of Certification sourced through traders (dealers, collection centers), information listed below shall be obtained:</p> <ul style="list-style-type: none"> i) Geolocation of FFB origins; ii) Proof of the ownership, customary rights or other land user rights to the land by the farmers; iii) Where applicable, valid planting/ operating/ trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>Procedural note: A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process</p> <p>“And would require growers” > And would require growers and mills</p> <p>Geolocation:</p> <ul style="list-style-type: none"> > Using the GeoRSPO platform > Using national traceability initiatives, such as the Malaysia Palm Oil Board <p>Legality:</p> <ul style="list-style-type: none"> > RSPO MB mills should ensure all suppliers, certified or not, are certified with national standards (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance""

#	Indicator	Comment (English)
128	2.3.1	<p>"RSPO requirements will be more difficult to be aligned with global traceability standards that is increasingly becoming a global trend as evident from EU Deforestation Regulation, UK Environment Act, US Forest Act, and interests from other major palm oil consumer countries such as China. Although RSPO is indeed a different sets of standard, but this will make it more impractical for producer members to follow different sets of standards. It was observed that the EUDR-RSPO Gap analysis report concludes that RSPO is in a good position to provide information on the EUDR geolocation requirement. Especially, Criterion 2.3.1 provides a basis under which geo-location information can be made available for all Fresh Fruit Bunches (FFB) (certified and non-certified).</p> <p>However, for full alignment with EUDR requirements the following gaps needs to be covered on new RSPO P&C Standard:</p> <ol style="list-style-type: none"> 1. Geo-location requirements of polygon should be added to bring it in line with the EUDR for plots above 4 hectares; 2. Definition on 'FFB origin' should be added and aligned with EUDR definitions of 'plot of land'; Special attention should be given to the 'an extension of land within a single real-estate property'; <p>Therefore, we recommend that RSPO should add more the clarity on "Geolocation" and "FFB origin" definition or requirement."</p>
129	2.3.1	<p>"2.3.1 Task Clusters need to consider the situation in the field where many direct TBS suppliers (direct suppliers) refuse to provide information about the land legality document because this is something personal and confidential</p> <p>It also makes it difficult for the existence of a certification unit among other surrounding companies that are not certified RSPO in terms of competition to get the supply of FFB from external suppliers because of this requirement."</p>
130	2.3.1	<p>"2.3.1 I suggest modifying item 3 of this indicator: When applied, legal compliance referring to exploitation and/or crop marketing permits."</p>
131	2.3.1	<p>Geographical information must be clarified about the term, if this includes coordinates and/or polygons of the lots where the crop develops. Aligned with the new European regulation if polygons and not only coordinates should be included</p>
132	2.3.2	<p>Agents who sourced FFB from farmers and supply to mills as indirect supply are not resourced enough to carry out activities such as mapping,etc</p>
133	2.3.2	<p>Due to the nature of distribution of agent relationship , it is practically not feasible at all to get credible information about the geo location and proof of ownership</p>
134	2.3.2	<p>The difference between direct and indirect FFB suppliers creates biases and FFB suppliers would rather become indirect suppliers as the requirements are lenient.</p>

#	Indicator	Comment (English)
135	2.3.2	<p>""For all Fresh Fruit Bunch (FFB), the Unit of Certification sourced through traders (dealers, collection centers), information listed below shall be obtained:</p> <ul style="list-style-type: none"> i) Geolocation of FFB origins; ii) Proof of the ownership, customary rights or other land user rights to the land by the farmers; iii) Where applicable, valid planting/ operating/ trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>Procedural note: A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process</p> <p>“And would require growers” > And would require growers and mills</p> <p>Geolocation:</p> <ul style="list-style-type: none"> > Using the GeoRSPO platform > Using national traceability initiatives, such as the Malaysia Palm Oil Board <p>Legality:</p> <ul style="list-style-type: none"> > RSPO MB mills should ensure all suppliers, certified or not, are certified with national standards (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance""
136	2.3.2	<p>"This will increase the reputational risk for RSPO.</p> <p>Previously, the indicator include requirements to have the same traceability evidence as directly sourced FFB (indicator 2.3.1) that are geo-location, proof of land rights/ownership, and where applicable, valid planting/operating/trading license or cooperative membership allowing it to bu/sell FFB.</p> <p>Removing some of them, will make it more difficult for RSPO to be aligned with national laws/regulation in Indonesia especially ISPO.</p> <p>For example, as RSPO is piloting an alignment with ISPO in Jambi, this change to the criteria will also put that project to more risk. Eliminating those requirements does not support Government of Indonesia’s (GOI) effort to develop database on smallholder farmers through the Cultivation Registry Letter (Surat Tanda Daftar Budidaya - STDB) that is also a requirement for ISPO. This will estrange the relationship of RSPO with GOI and sub-national governments that already have targets and allocate resources toward STDB and ISPO."</p>

#	Indicator	Comment (English)
137	2.3.2	Agreed with the other comments here - wording on including the other requirements under 2.3.1 needs to be reinstated here. Not clear why it has been removed
138	2.3.2	Define what is indirect sourcing and direct sourcing
139	2.3.2	<p>"Recommendation for Indicator 2.3.2: To keep "the evidence as listed in Indicator 2.3.1".</p> <p>Rationale: To strengthen the message on legal compliance and proper business licensing of the mills as mentioned in Indicator 2.3.1.</p> <p>Additional comments for indicator 2.3.2: We support the improvement of this indicator which seems to ensure compliance with the EU Deforestation Regulation. "</p>
140	2.3.2	[Accra WS] 2.3.2 should include requirement of legality - as this will risk FFB coming from indirect supplier are not legal.
141	2.3.2	<p>""For all Fresh Fruit Bunch (FFB), the Unit of Certification sourced through traders (dealers, collection centers), information listed below shall be obtained:</p> <ul style="list-style-type: none"> i) Geolocation of FFB origins; ii) Proof of the ownership, customary rights or other land user rights to the land by the farmers; iii) Where applicable, valid planting/ operating/trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>Procedural note: A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process</p> <p>"And would require growers" > And would require growers and mills</p> <p>Geolocation: > Using the GeoRSPO platform > Using national traceability initiatives, such as the Malaysia Palm Oil Board</p> <p>Legality: > RSPO MB mills should ensure all suppliers, certified or not, are certified with national standards (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance""</p>

#	Indicator	Comment (English)
142	2.3.2	"we need to get the clarity about this indicator, whether this new indicator means the mill doesn't need to prove the legality and operational license of indirect supplier (including License for Collection centres, agents, cooperative and so on) ? Suggest to add: "...as well as other evidence listed in indicator 2.3.1" "
143	2.3.2	Should also require proof of legality and a valid operational license. In absence of this being required, suggest adding "as well as other evidence listed in indicator 2.3.1."
144	2.3.2	"Suggest to keep the criteria: ""...evidence as listed in 2.3.1"" in. Now the legality requirement is excluded for indirect FFB. This could cause problems if RSPO wants to assist members complying with EUDR and other mandatory due diligence that have legality as a basis like the UK Env. Act and upcoming d.d. in the USA. Most downstream members or RSPO are in these markets and need to show compliance. Besides, it is watering down the standards compared to 2018. What are the arguments for this?"
145	2.3.2	"Suggest RSPO to define geolocation and related requirements from companies i.e. upstream and downstream. What type of information should company keep/collect and manage? [What is RSPO definition of geo-location of FFB origins. Is it just a GPS point and hectareage or is it an actual polygon?]"
146	2.3.2	"This new indicator means the company doesn't need to prove the legality and operational license (including License for Collection centres, agents, cooperative and so on). Suggest to add: "...as well as other evidence listed in indicator 2.3.1" as for 2.3.1 indicator, It is required to provide a Trader/business operation license for FFB Supplier. Previously, the indicator include requirements to have the same traceability evidence as directly sourced FFB (indicator 2.3.1) that are geo-location, proof of land rights/ownership, and where applicable, valid planting/operating/trading license or cooperative membership allowing it to buy/sell FFB. Removing some of those elements, will increase the reputational risk for RSPO and make it more difficult for RSPO to be aligned with national laws/regulation in Indonesia especially ISPO. Proposed indicator: 2.3.2 For all indirectly sourced FFB, the Unit of Certification shall obtain from the collection centres, agents or other intermediates, the information on geo-location of FFB origins and other evidence listed in indicator 2.3.1."
147	2.3.2	[Jakarta WS] 2.3.2 Call for maintaining just the geolocation – not to include requirements on legality of indirectly FFB suppliers - as legality for indirect suppliers is hard to get.

#	Indicator	Comment (English)
148	2.3.2	[Jakarta WS] 2.3.2 Potential risk of watering – where the requirement of ensuring legality from indirect FFB suppliers is removed. The requirement should be maintained – implementation can be done through guidance or tool provided. – reputation risk to RSPO – also the alignment with ISPO – this is crucial when touching on legality (legality should be the key)
149	2.3.2	This geolocation information should also include if it corresponds to coordinates and/or polygons
150	2.3.2	2.3.2 I think I should say that intermediaries must comply with indicator 2.3.1 (if that is the meaning)
151	2.3.2	[Abidjan WS] 2.3.2 only required geolocation but not legality - may leads to un intended consequences of which UoC start shifting to use indirect suppliers. - Concerns raised
152	2.4	This system must be accessible to all stakeholders - and the process must be communicated to them in advance.
153	2.4	This system must be accessible to all stakeholders - and the process must be communicated to them in advance.
154	2.4	This system must be accessible to all stakeholders - and the process must be communicated to them in advance.
155	2.4	"Recommendation for Criteria 2.4: After the last sentence, consider adding: “The grievance system shall follow the Effectiveness Criteria of the UN Guiding Principles on Business and Human Rights”. Rationale: 1)To align with the existing global principles so that we can enhance the use of common language on the effectiveness of the grievance system. 2)To express a more explicit goal to create and implement an ‘effective’ grievance system. "
156	2.4	The certification unit, in consultation with communities and workers, develops and implements a system for handling complaints and grievances, and provides for their resolution. This system must be accessible to all stakeholders - and the process must be communicated to them in advance.
157	2.4	This system must be accessible to all stakeholders - and the process must be communicated to them in advance.
158	2.4	The certification unit, in consultation with communities and workers, develops and implements a system for handling complaints and grievances, and provides for their resolution. This system must be accessible to all stakeholders - and the process must be communicated to them in advance.
159	2.4	This system must be accessible to all stakeholders - and the process must be communicated to them in advance.
160	2.4	This system must be accessible to all stakeholders - and the process must be communicated to them in advance.
161	2.4	This system must be accessible to all stakeholders - and the process must be communicated to them in advance.
162	2.4	The certification unit, in consultation with communities and workers, develops and implements a system for handling complaints and grievances, and provides for their resolution. This system must be accessible to all stakeholders - and the process must be communicated to them in advance.

#	Indicator	Comment (English)
163	2.4	This system must be accessible to all stakeholders - and the process must be communicated to them in advance.
164	2.4	[2.4] It would be ideal to group all grievance mechanism requirements under one criterion (2.4, 4.5, 5.1.9).
165	2.4	"The certification unit, in consultation with communities and workers, develops and implements a system for handling complaints and grievances, and provides for their resolution. This system must be accessible to all stakeholders - and the process must be communicated to them in advance."
166	2.4	Proposal: Continue to use the criteria 4.2 P&C 2018: The existence of a system agreed upon and documented to handle complaints and complaints, which are implemented and accepted by all affected parties.
167	2.4	Proposed Criteria 2.4: Keep using the sentences in P&C 2018
168	2.4	"Criteria 2.4. In order to be relevant to indicators 2.4.1 and 2.4.2, the sound criterion 2.4 is proposed to be: The certification unit communicates with the community and workers to implement a system of handling complaints Considerations: because indicators 2.4.1 and 2.4.2 indicate that the complaint handling system must be made by the certification unit and then communicated to the community and workers"
169	2.4.1	"This is a wooly indicator, packing so many requirements in a single indicator to the point that it is not auditable. RSPO should be cognizant of the fact that there already exists a common/potential list of grievances in certification units. This should be used as guidance to frame indicator 2.4.1. The indicator has been made very complex and packed with so many requirements that it would be difficult to gather objective evidence at the time of audit. Gender-related grievances or other sensitive grievances should be addressed in a separate indicator. "
170	2.4.1	"A complaint to the grievance mechanism"... It is not possible to complain to a mechanism. An individual can raise a complaint through the grievance mechanism. This part of the indicator should be reworded.
171	2.4.1	"[HRWG] Recommendation: To use the phrase 'known to affected communities etc' instead? Or another way to express this. Auditors can ask community members etc whether they know the existence of the grievance mechanism. Recommendation: To use 'In consultation' instead of 'mutually agreed' - use 'in consultation' in Principle 2 and 4. We can leave it to the company how to conduct their consultation."
172	2.4.1	all relevant stakeholders must be freely informed of grievance resolution mechanisms, or even be involved in the workshops to create and implement these procedures
173	2.4.1	2.4.1 Inconsistent use of '.' and ',' in listing the elements in this indicator. Punctuation should be addressed.

#	Indicator	Comment (English)
174	2.4.1	2.4.1 From audit experience, a grievance mechanism in most UoC is restricted to infrastructure maintenance and housing facilities. Indicator 2.4.1 takes a whole different dimension where the grievance mechanism is concerned. The framing of this indicator needs a sound understanding of situations and detailed discussion amongst relevant stakeholders before being placed in the standard. The requirements do not take into consideration nor recognize rural situations and workers' psyches.
175	2.4.1	all relevant stakeholders must be freely informed of grievance resolution mechanisms, or even be involved in the workshops to create and implement these procedures
176	2.4.1	The category "spouse of workers" and "their representatives" requires more clarification within this list. If it is suggested the for those living on the plantation, or within plantation housing, then possibly it could be changed to "dependents of the workers"? Otherwise they may fall under other relevant stakeholders. It needs to be clear what relation the "spouses" and "representatives" have to the company BESIDES their relationship to the worker.
177	2.4.1	Recognizing the gravity of the complaint is important. In some cases, the UoC would not have the mechanism to solve complex complaints, and thus, should also incorporate in its mechanism a point of decision, allowing the complainant to raise it through the legal process.
178	2.4.1	all relevant stakeholders must be freely informed of grievance resolution mechanisms, or even be involved in the workshops to create and implement these procedures
179	2.4.1	all relevant stakeholders must be freely informed of grievance resolution mechanisms, or even be involved in the workshops to create and implement these procedures
180	2.4.1	[Accra WS] 2.4.1 (iii) To remain just confidentiality - remove 'anonymity' as it will make it difficult for the process
181	2.4.1	"Independent technical advice should be omitted. justification 1)Leads to conflict of interest 2)Undue influence"
182	2.4.1	"Grievance mechanisms should include mutal agreement between parties and equal participation of stakeholders. Should also be open for review within certain periods (see how this is arranged in other schemes or guidelines)"
183	2.4.1	Who determines the "appropriate remediates"? The auditors or the unit of certification? What is considered appropriate? This is non-auditable.
184	2.4.1	[Accra WS] 2.4.1 remove the specific mentioning of 'spouses of workers' as this will create different interpretation - where spouses of workers residing outside of UoC will be needed to be included.
185	2.4.1	line break
186	2.4.1	all relevant stakeholders must be freely informed of grievance resolution mechanisms, or even be involved in the workshops to create and implement these procedures

#	Indicator	Comment (English)
187	2.4.1	"Suggest to align the grievance mechanism with the 8 UNGP criteria: legitimate, accessible, predictable, equitable, transparent, rights compatible, a source of continuous learning, based on engagement and dialogue for operational level grievance mechanisms. [Is this grievance mechanism aligned with the 8 UNGP criteria based on engagement and dialogue?]"
188	2.4.1	all relevant stakeholders must be freely informed of grievance resolution mechanisms, or even be involved in the workshops to create and implement these procedures
189	2.4.1	"This procedure may be amended from time to time as the need arises: new regulations (national or international), new grievances revealed, cases of conflict, etc."
190	2.4.1	all relevant stakeholders must be freely informed of grievance resolution mechanisms, or even be involved in the workshops to create and implement these procedures
191	2.4.1	These details make the indicator too lengthy and suggest to move to guidance. The indicator shall keep it precise and auditable.
192	2.4.1	How to ensure the procedure is child and gender sensitive from CB's auditors perspective?
193	2.4.1	[Accra WS] 2.4.1 (iv) provide access to ... information and advice - should not be a responsibility of UoC. Define how much and how to avoid potential conflict of interest?
194	2.4.1	"This now refers to 'stakeholders' instead of 'all affected parties' - need to be clear if there is any difference in intention here, and whether changing this wording is likely to exclude any affected parties? Additionally, explicit reference to HRDs seems to have been removed, not clear why? Need to ensure wording changes do not reduce the scope of who is included"
195	2.4.1	"all relevant stakeholders must be freely informed of grievance resolution mechanisms, or even be involved in the workshops to create and implement these procedures"
196	2.4.1	all relevant stakeholders must be freely informed of grievance resolution mechanisms, or even be involved in the workshops to create and implement these procedures
197	2.4.1	all relevant stakeholders must be freely informed of grievance resolution mechanisms, or even be involved in the workshops to create and implement these procedures
198	2.4.1	All relevant stakeholders must be freely informed of grievance resolution mechanisms, or even be involved in the workshops to create and implement these procedures

#	Indicator	Comment (English)
199	2.4.1	<p>"To remove the sentence of 'which is gender and child-sensitive' in the indicator.</p> <p>The purpose of this indicator is to safeguard the complainant's anonymity and prevent any intimidation towards them. To ensure compliance with this indicator, specific components have been outlined in the grievance mechanism. These components address the protection of the complainant's identity and aim to mitigate any potential threats or harassment they may face. Putting the wording of gender and child-sensitive in the indicator would create confusion and repetitive if the intent of the indicator has been outlined in the elements that shall be follow by the UoC.</p> <p>If it is the context, RSPO shall clarify more on what are the condition for UoC to achieve a grievance mechanism that is gender and child-sensitive in order to comply with this indicator."</p>
200	2.4.1	<p>all relevant stakeholders must be freely informed of grievance resolution mechanisms, or even be involved in the workshops to create and implement these procedures</p>
201	2.4.1	<p>"“resolves disputes in an effective manner” is missing now.</p> <p>The evaluation of effectiveness grievance mechanism still are not covered yet by this indicator.</p> <p>The evaluation of the effectiveness is very important to promote better management of grievance mechanism and hence minimise the risk of grievance turning into complaint.</p> <p>The grievance mechanism system of UoC also shall follow “the Effectiveness Criteria of the UN Guiding Principles on Business and Human Rights”.</p> <p>The rationale of this suggestion 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>Therefore, Suggest to add one indicator : The effectiveness of grievance mechanism shall be evaluated in consultation with stakeholders every xxx years. The evaluations shall be documented."</p>

#	Indicator	Comment (English)
202	2.4.1	"2.4: The criteria are returned according to P&C 2018, namely: 4.2 the system agreed upon and documented for handling complaints and complaints, which are carried out and received by all affected parties. Sentence ""Consulting with the community and workers"" is different with the ""agreed upon system""."
203	2.4.1	Proposed Indicator 2.4.1: Sentences Criteria should use the sentences contained in P&C 2018 so that it is easier to understand. Proposed for indicator sentences: - Remove the sentence "(which is gender and child sensitive)" - Remove the word "husband/wife", because it is included in the category of other stakeholders
204	2.4.1	"2.4.1 Gender and Child Sensitive to be replaced into gender sensitive only to be consistent with the following sentence below it Handling complaints is something dynamic and cannot be predicted the need for time to reach its resolution. Therefore, determining the estimated time for each stage of handling complaints in the SOP will make it difficult for the certification unit - Details of the mechanism for handling complaints do not need to be conveyed in detail in the indicator description. Simply written on the guide"
205	2.4.1	"2.4: This indicator should be combined with indicators in principle 4 related to Principle 4: Respect for affected communities and human rights, and provide benefits and ensure it is Remediation, if necessary"
206	2.4.1	"Proposed Indicator 2.4.1 Delete (gender sensitive and child) "" - Removing the word ""husband/wife"", because it has been included in the category of other stakeholders"
207	2.4.1	"- Sentences Criteria Using P&C 2018 sentences - Sentence ""(which is gender and child sensitive)"" deleted - Remove the word ""husband/wife"", because it is included in the category of other stakeholders"
208	2.4.1	"2.4.1: The phrase ""gender sensitive and child"" is deleted because of multi-interpretation and is very subjective to assess the level of ""sensitivity"" 2.4.1: The phrase ""husband/wife of workers"" is deleted because it is included in the category of other stakeholders."

#	Indicator	Comment (English)
209	2.4.1	"Indicator 2.4.1 Proposed: - Sentences Criteria Using P&C 2018 sentences - Sentence ""(which is gender and child sensitive)"" deleted - Remove the word ""husband/wife"", because it is included in the category of other stakeholders "
210	2.4.1	"2.4.1: The phrase ""husband/wife of workers"" is deleted because it has been included in the category of other stakeholders"
211	2.4.1	"2.4.1: The phrase ""gender sensitive and child"" is deleted because multi-interpretation and very subjectively assessing the level ""Sensitivity"""
212	2.4.1	"Comment: - Sentences Criteria Using P&C 2018 sentences - Sentence ""(which is gender and child sensitive)"" deleted - Remove the word ""husband/wife"", because it is included in the category of other stakeholders Proposed changes: 2.4.1 (c) The mechanism for handling complaints and complaints can be accessed by related parties, including the community, planters, workers, workers' representatives, and other related stakeholders, must be developed and applied. Procedures that are confidential and sensitive to report acts of sexual harassment and gender -based discrimination must also be prepared and implemented This mechanism must include the following elements: i) Procedure for accessing the mechanism for handling complaints and complaints; ii) estimated time to receive, acknowledge, process, investigate, respond, and resolve complaints and complaints; iii) Procedure for maintaining the identity (anonymity) of the complainant and guarantees confidentiality; IV) Procedure for the Certification Unit to allow the complainant to access relevant sources of information, independent legal and technical considerations, and independent dispute resolution mechanisms; v) Providing effective access to appropriate recovery measures; VI) There is no intervention of efforts to achieve appropriate recovery actions (law/non -law); vii) Protection of acts of reply or intimidation as a consequence of using the mechanism for handling complaints and complaints. Complaints to the complaint mechanism must not prevent the complainant to report the same issue through legal processes, if it applies"

#	Indicator	Comment (English)
213	2.4.1	"Proposed Indicator 2.4.1: - Sentence ""(which is gender and child sensitive)"" deleted - Remove the word ""husband/wife"", because it is included in the category of other stakeholders"
214	2.4.1	In indicators 2.4.1 sentences "(which are gender and children) are" deleted because this indicator is not only fixated on gender and child limits. Delete the word "husband/wife", because it has been accommodated in the category of other stakeholders
215	2.4.1	"There is a guide note for criteria 2.4: Criteria for complaints handling mechanisms need to refer to the Principle 31 UNGPS: ""To ensure the effectiveness of non-judicial mechanisms, non-judicial complaints mechanisms, both state-based and not state-based must: SAH: Give the trust of the intended stakeholder group, and is responsible for providing fair behavior for the complaint process; Accessibility: known its existence by all the intended stakeholder groups, and provides sufficient assistance for those who face special obstacles to access; Special obstacles to access can include a lack of knowledge of the mechanism, language, literacy, cost, place of domicile, and fear of the threat of retaliation. Can be predicted: provide a clear and known procedure with a certain period of time for each stage, and clarity about the types of processes and results available and ways to oversee the implementation: Justice: Ensuring that the disadvantaged party has sufficient access to the source of information, advice, and expertise needed to be involved in a complaint process in a fair, informed and respected form; Transparent: Make the parties who complain to get information about the progress of complaints, and provide adequate information about the performance of the mechanism to build trust in its effectiveness and meet the public interests that are in question; In accordance with the rights: ensuring that the results and recovery are in accordance with internationally recognized human rights; Sources for the learning process: use relevant efforts to identify lessons for improving mechanisms and preventing loss and violations in the future; The operational level mechanism must also be: Based on involvement and dialogue: consult with the intended stakeholder group on performance and design, and focus on dialogue as a way to overcome and resolve complaints; "

#	Indicator	Comment (English)
216	2.4.1	<p>"2.4: Criteria are returned according to P&C 2018, namely: 4.2 The existence of a mutually agreed and documented system to handle complaints and complaints, which are implemented and accepted by all affected parties. The phrase ""consulting with the community and workers"" is different from ""the agreed system"".</p> <p>2.4: This indicator should be combined with indicators on principle 4 related to respecting affected communities and human rights, as well as providing benefits and ensuring remediation, if needed."</p>
217	2.4.1	<p>"Proposal: - Sentences Criteria Using P&C 2018 sentences - Sentence ""(which is gender and child sensitive)"" deleted - Remove the word ""husband/wife"", because it is included in the category of other stakeholders"</p>
218	2.4.1	<p>- Sentences Criteria Using P&C 2018 sentences; The sentence "(gender and child sensitive)" is deleted. ; Remove the word "husband/wife", because it is included in the category of other stakeholders.</p>
219	2.4.1	<p>2.4: Criteria are returned according to P&C 2018, namely: 4.2 The existence of a mutually agreed and documented system to handle complaints and complaints, which are implemented and accepted by all affected parties. The phrase "consulting with the community and workers" is different from "the agreed system".</p>
220	2.4.1	<p>"Proposed Indicator 2.4.1: Sentences Criteria should refer to the sentence P&C 2018 is easier to understand. Proposed for indicator sentences: - Remove the sentence ""(which is gender and child sensitive)"" - Remove the word ""husband/wife"", because it is included in the category of other stakeholders"</p>
221	2.4.1	<p>"Indicator 2.4.1 (c) is proposed in order to: 1. Sentences Criteria Using P&C 2018 sentences. 2. Sentence ""(which is gender sensitive and child)"" deleted. 3. The word ""husband/wife"" is deleted because it is included in the category of other stakeholders."</p>
222	2.4.1	<p>"2.4.1: The phrase ""gender sensitive and child"" is deleted because of multi-interpretation and is very subjective to assess the level of ""sensitivity"" 2.4.1: The phrase ""husband/wife of workers"" is deleted because it is included in the category of other stakeholders."</p>
223	2.4.1	<p>"- Sentences Criteria Using P&C 2018 sentences. ; The sentence ""(gender and child sensitive)"" is deleted. ; Remove the word ""husband/wife"", because it is included in the category of other stakeholders."</p>

#	Indicator	Comment (English)
224	2.4.1	"Proposed 2.4.1: 1. Delete sentences in brackets (gender and children) 2. Remove the word ""husband/wife"", because it has been included in the category of other stakeholders."
225	2.4.1	"Proposed: (a). Sentences Criteria Using P&C 2018 sentences, (b). The sentence ""(which is gender and children) is"" deleted, (c). Delete the word ""husband/wife"", because it is included in the category of other stakeholders"
226	2.4.1	iv) clarify that guide routes for legal and technical advice that seeks impartiality, identifying the interested parties that can represent them and facilitate the resolution of the conflict, but not that it is a position for the palm or producer company (this if it would be impartiality) . It is suggested to include: a mechanism of requests, complaints, claims and suggestions (PQRS) will be developed and implemented that has a gender approach and social inclusion (GESI), accessible to interested parties: local and social communities, ethnically differentiated groups, small, small producers, workers and their family nuclei (according to national regulations). Confidential and conscious procedures will be developed and applied with gender issues to denounce cases of sexual harassment and gender discrimination.
227	2.4.1	"Eliminate the word childhood and spouse from the description of the indicator, it is suggested only to indicate that the complaint mechanism must be accessible to anyone. For audit purposes, as shown that the infant has knowledge about the mechanism. "
228	2.4.1	"iv) The certification unit should not be responsible for legal advice to the demanding parties in conflict resolution processes, the principle of impartiality is lost. It is suggested: a mechanism of requests, complaints, claims and suggestions (PQRS) will be developed and implemented that has a social gender and inclusion approach (GESI), accessible to interested parties: local and social communities, differentiated ethnic groups, small, small producers, workers and their family nuclei (according to national regulations). Confidential and conscious procedures will be developed and used with gender issues to denounce cases of sexual harassment and gender discrimination."
229	2.4.1	2.4.1 Item IV: No responsibility for the certification unit will not be able to give legal advice.

#	Indicator	Comment (English)
230	2.4.1	<p>"I suggest for 2.4.1 (c): a mechanism of complaints that is accessible to the pertinent stakeholders (workers, contractors, suppliers, clients, members of the communities of the area of influence, government entities and non -governmental entities will be developed and implemented). Procedures will be developed and applied to discuss issues related to gender, cases of sexual harassment, labor abuse or discrimination.</p> <p>Will include the following elements:</p> <ul style="list-style-type: none"> i) Procedures to access the complaint mechanism i) estimated deadlines to receive, accuse receipt, process, investigate, respond and solve claims iii) Procedure to maintain the anonymity of the complainant and guarantee confidentiality iv) procedures for the UDC to easier to plaintiffs on access to relevant sources of information or which agency to go to conflict resolution. v) Appropriate forms of remediation. vi) No interference with efforts to obtain other appropriate forms of remediation (judicial/non -judicial). VII) Protection against retaliation or intimidation as consequence of the use of the complaint mechanism. <p>-----</p> <p>It is not clear the sense of naming childhood and spouses. The UDC has no resources to address family complaints, which are not available to the labor issue. Nor is it objective that assumes the cost of an advisor to the complainant (this can be provided for abuses from any of the parties)."</p>
231	2.4.1	<p>The certification unit should not be responsible for legal advice to the demanding parties in conflict resolution processes, the principle of impartiality is lost.</p>
232	2.4.1	<p>"Modify item IV indicating that the UDC may supply a guide for legal and technical advice that seeks impartiality, identifying the interested parties that can represent them and facilitate the resolution of the conflict. (but not that the obligation to give and pay that advice by the UDC) is understood</p> <p>The following indicator writing is suggested: a mechanism of requests, complaints, claims and suggestions (PQRS) will be developed and implemented that has a gender approach and social inclusion (GESI), accessible to interested parties: local and social communities, groups Ethnically differentiated, small producers, workers and their family nuclei (according to national regulations).</p> <p>Confidential and conscious procedures will be developed and applied with gender issues to denounce cases of sexual harassment and gender discrimination."</p>

#	Indicator	Comment (English)
233	2.4.1	<p>"iv) Clarify that guide routes for legal and technical advice that seeks impartiality, identifying the interested parties that can represent them and facilitate the resolution of the conflict, but not that it is a position for the palm company or the producer.</p> <p>It is suggested to include: a mechanism of requests, complaints, claims and suggestions (PQRS) will be developed and implemented that has a gender approach and social inclusion (GESI), accessible to interested parties: local and social communities, ethnically differentiated groups, small, small producers, workers and their family nuclei (according to national regulations).</p> <p>Confidential and conscious procedures will be developed and applied with gender issues to denounce cases of sexual harassment and gender discrimination."</p>
234	2.4.1	[Abidjan WS] 2.4.1(C) to delete 'spouses of workers' - this is not implementable and open for different interpretations - which include all spouse of workers even not residing within Unit of Certification
235	2.4.2	2.4.2 Construct this indicator in a logical manner rather than cramping the whole list of stakeholders in a sentence. It should be kept in mind that indicators require objective evidence to be auditable. This would then come across as another indicator that is just glanced at and ticked unless it is systematically listed.
236	2.4.2	<p>"[HRWG] In favour of using the term "an agreed time frame" instead of a "timely manner" as this is very vague.</p> <p>The important thing is having a clear process with timeframes.</p> <p>Concern of what is meant by "timely manner": Timeliness should depend on the complexity of a grievance e.g.:</p> <p>"I don't understand my payslip". This may require 3 days because it's simple. Compare this to whistleblowing matter which requires investigation and may take 1 month.</p> <p>Companies have specified timeframes to address specific types of grievances. If you say UoC can set the timeframe themselves, it may raise the issue that some UoCs don't have resources and may have to take longer.</p> <p>Recommendation: The language should be: 'a clear and reasonable timeframe' and not 'agreed timeframe' or 'timely manner'.</p> <p>There should also be a language within this indicator to say that the timeframes should be established based on what the process for each type of grievance. The requirement for the UoC to establish a 'clear and reasonable timeframe' should be in Principle 2 and 4."</p>
237	2.4.2	[Sandakan, 21 June 2023] ...make accessible (e.g. website, social media, notice board, "apps" etc.)...
238	2.4.2	2.4.2 Confusing and inconsistent usage of capitalization in this indicator... such as "Worker" and "Smallholder".

#	Indicator	Comment (English)
239	2.4.2	Proposed Indicator 2.4.2: the word "and" on the "complainant indicator and its representatives continue to be informed about the development of complaints submitted" should be changed to "or" so that it gives space for complaints to directly obtain information on the development of complaints
240	2.4.2	"Proposal 2.4.2 The word ""women and children are deleted, because they are included in the category of other stakeholders (vulnerable groups) Proposed improvement: 2.4.2 Certification units must socialize and facilitate access (for example, websites, social media, announcement boards, etc.) on procedures relating to the mechanism for handling complaints and complaints to the community, planters, workers, representatives, and other stakeholders, As well as all levels of labor, activities, suppliers, and workforce recruiters with the language they understand. Provided assistance to related parties who face obstacles in accessing the mechanism for handling complaints and complaints."
241	2.4.2	"Proposed 2.4.2: Remove the word ""women and children"", because it is included in the category of other stakeholders (vulnerable groups)"
242	2.4.2	In indicators 2.4.2 it is proposed to delete the word "women and children", because it has been included in the category of other stakeholders (vulnerable groups)
243	2.4.2	"Comment: Remove the word ""women and children"", because it is included in the category of other stakeholders (vulnerable groups) Proposed improvement: 2.4.2 Certification Units must socialize and facilitate access (for example, websites, social media, announcement boards, etc.) on procedures relating to the mechanism for handling complaints and complaints to the community, planters, workers, representatives, and other stakeholders, as well as all levels labor, activities, suppliers, and recruiters of labor in the language they understand. Provided assistance to related parties who face obstacles in accessing the mechanism for handling complaints and complaints."
244	2.4.2	Proposal 2.4.2 The word "women and children are deleted, because it is included in the category of other stakeholders (vulnerable groups) Proposed improvement: 2.4.2 Certification units must socialize and facilitate access (for example, websites, social media, notice boards, etc.) on procedures In connection with the mechanism for handling complaints and complaints to the community, planters, workers, their representatives, and other stakeholders, as well as all levels of labor, activities, suppliers, and recruiters of labor in the language they understand. mechanism for handling complaints and complaints.

#	Indicator	Comment (English)
245	2.4.2	"Proposed 2.4.2: Remove the word ""women and children"", because women and children are included in the category of other stakeholders (vulnerable groups). So as not to repetition."
246	2.4.2	2.4.2. Remove the word "women and children", because it is included in the category of other stakeholders (vulnerable groups)
247	2.4.2	2.4.2: The sentence "women and children" is removed because it is included in the category of other stakeholders (vulnerable groups).
248	2.4.2	"Proposal: Remove the word ""women and children"", because it is included in the category of other stakeholders (vulnerable groups)"
249	2.4.2	Indicator 2.4.2 is proposed to: The word "female and child" is removed because it is included in the category of other stakeholders (vulnerable groups).
250	2.4.2	"2.4.2: The word ""female and child"" is removed because it has been included in the category of other stakeholders (vulnerable group)."
251	2.4.2	Remove the word "women and children", because it is included in the category of other stakeholders (vulnerable groups)
252	2.4.2	Proposal 2.4.2 The word "women and children are removed, because they are included in the category of other stakeholders (vulnerable groups)
253	2.4.2	Proposed: delete the word "women and children", because it is included in the category of other stakeholders (vulnerable groups), so the sentence becomes: 2.4.2 Certification Unit must socialize and facilitate access (for example, websites, social media, announcement boards, etc.) The procedures relating to the mechanism for handling complaints and complaints to the community, planters, workers, representatives, and other stakeholders, as well as all levels of labor, activities, suppliers, and recruiters of the workforce with the language they understand, including the Tunaaksara and the vulnerable group. Provided assistance to related parties who face obstacles in accessing the mechanism for handling complaints and complaints.
254	2.4.2	2.4.2: The word "female and child" is deleted because it is included in the category of other stakeholders (vulnerable groups).
255	2.4.2	"Proposal: the word ""and"" in the sentence ""the complainant and representatives continue to be informed about the development of complaints submitted"" proposed to be changed to ""or"""
256	2.4.2	Clarify the scope or eliminate the description of this indicator to women and children.
257	2.4.2	Eliminate, delimit or clarify "childhood and spouses" scope "
258	2.4.2	2.4.2 Eliminate children, and define the scope, or leave only interested parties
259	2.4.2	"2.4.2. To say clearly that the answers to the interested party must be disseminated to protect confidentiality. Quitr to children as an interested part or explain why they are included."

#	Indicator	Comment (English)
260	2.4.2	"I suggest for indicator 2.4.2 The certification unit will disclose, through the internal and external media with which you have, the procedures related to the mechanism of complaints to their interested parties (workers, contractors, suppliers, clients, entities governmental and non -governmental and members of the communities in their area of influence). Said socialization will be done in local languages, giving reach people illiterate."
261	2.4.2	Important to define the scope of the support that the UDC will provide to the interested party. Being the UDC who provides support can be lost objectivity in the management of the objective, it is better that the UDC provides spaces to communicate the mechanisms to resolve obstacles.
262	2.4.2	"Eliminate, delimit or clarify childhood scope and spouses. "
263	2.4.2	Eliminate children from scope and leave only interested parties
264	2.4.2	Eliminate, delimit or clarify "childhood and spouses" scope "
265	2.4.2	[Abidjan WS] 2.4.2 to revert back to P&C 2018 wordings - as it is much more clearer on implementation and more auditable
266	2.4.3	" 2.4.3 It is noticed that the indicators in this standard are not to the point, and there is a convoluted way that these have been framed. Indicators are meant to be straight to the point and concise, allowing conformity to be addressed by ensuring that objective evidence is detectable. ""Grievance(s) raised are responded to and are either resolved or are in the process of resolution."" - Convoluted style of writing. "
267	2.4.3	[Accra WS] 2.4.3 (c) replaced ' how they will be resolved' to 'a progressing plan to resolving it'. It will be difficult to also pre-determine how it can be resolved.
268	2.4.3	A plantation cannot always be in the position to state HOW the grievance will be resolved. It may state how they are addressing the grievance, and provide a status update of the ongoing process. However, the resolution itself may still need to be found.
269	2.4.3	[Abidjan WS] 2.4.3 Grievance(s) raised are responded to and are either resolved 'and/or' are in the process of resolution - add 'and/or.
270	2.4.4	2.4.4. The 2018 version of this indicator is better phrased. Consider using that one. You could add the language factor to 2.4.4.
271	2.4.4	[Sandakan, 21 June 2023] The records should be kept for 24 months or 36 months.
272	2.4.4	the word "and" in the sentence "the complainant and representatives continue to be informed about the development of complaints submitted" changed to "or"

#	Indicator	Comment (English)
273	2.4.4	"Proposed indicator 2.4.4 the word ""and"" in the sentence ""the complainant and representatives continue to be informed about the development of complaints submitted"" changed to ""or"""
274	2.4.4	In indicators 2.4.4 words "and" on "the complainants and representatives continue to be informed about the development of complaints submitted" changed to "or"
275	2.4.4	Proposed indicator 2.4.4 words "and" in the sentence "the complainant and representatives continue to be informed about the development of complaints submitted" changed to "or"
276	2.4.4	"2.4.4: the word ""and"" changed to ""or"" because not all The complainant pointed to his representative, and if any representatives, communication is carried out through the representative, and if there are no representatives then communication is carried out directly to the complainant."
277	2.4.4	Indicator 2.4.4 is proposed to: The word "and" in the sentence "the complainant and representatives continue to be informed about the development of complaints submitted" changed to "or".
278	2.4.4	"Proposed improvement: change the word ""and"" to ""or"" on indicators 2.4.4 which states that ""the complainants and representatives continue to be informed about the development of the proposed complaints. The results must be presented and communicated in the language they understand"" to ""the complainant or representative. .. "" "
279	2.4.4	"Comment: the word ""and"" changed to ""or"" Proposed improvement: 2.4.4 The complainant or representative continues to be informed about the development of the complaints submitted. The results must be presented and communicated in the language they understand."
280	2.4.4	2.4.4: Kata "dan" diganti menjadi "atau" karena tidak semua pengadu menunjuk perwakilannya, dan jika ada perwakilannya maka komunikasi dilakukan melalui perwakilannya tersebut, dan jika tidak ada perwakilannya maka komunikasi dilakukan langsung kepada pihak pengadu.
281	2.4.4	"Indicator 2.4.4 Proposed: the word ""and"" in the sentence ""the complainant and representatives continue to be informed about the development of complaints submitted"" changed to ""or"""

#	Indicator	Comment (English)
282	2.4.4	"Proposal: the word ""and"" in the sentence ""the complainant and representatives continue to be informed about the development of complaints submitted"" changed to ""or"""
283	2.4.4	Change "and" to "or" because not all complainants have representatives
284	2.4.4	"Proposed indicator 2.4.4: Change the word ""and"" to ""or"" in the sentence ""the complainant and representatives continue to be informed about the development of complaints submitted"""
285	2.4.4	Proposed indicator 2.4.4: the word "and" in the sentence "the complainant and representatives continue to be informed about the development of complaints submitted" changed to "or"
286	2.4.4	<p>"Here does not appear indicator 2.4.5 in which there are objections.</p> <p>2.4.5 The effectiveness of the complaint mechanism will be evaluated in consultation with the interested parties every three years. Evaluations will be documented.</p> <p>Objection (producers):</p> <ol style="list-style-type: none"> 1. The effectiveness of the complaint mechanism has been evaluated by the Auditor (a) of the RSPO during the certification process and the annual surveillance audit. The PYCs of the RSPO have defined how the mechanism of complaints effectively by the certification unit should be developed and implemented. 2. The same scenario is also applied to other procedures required by the PyC of the RSPO, such as contracting, management and monitoring procedures of AVC, etc. Through the audit process, we can guarantee the effectiveness of such procedures that have been developed and implemented by the certification unit. 3. Not all interested parties are relevant, so measuring effectiveness is difficult. Instead of focusing on point 2.4.5, we must continue using the indicators of points 2.4.3 and 2.4.4, which already have several steps whose efficiency can be verified. 4. This is very complex. Companies cannot be ""at the mercy"" of the satisfaction of the plaintiffs."

#	Indicator	Comment (English)
287	2.4.4	<p>The process methodology must be evaluated because an interested party that does not receive a satisfactory response but that is correct, fair and legal can poorly qualify the evaluation of the mechanism. The objection is supported: objection (producers):</p> <ol style="list-style-type: none"> 1. The effectiveness of the complaint mechanism has been evaluated by the auditor (a) of the RSPO during the certification process and the annual surveillance audit. The PYCs of the RSPO have defined how the mechanism of complaints effectively by the certification unit should be developed and implemented. 2. The same scenario is also applied to other procedures required by the PyC of the RSPO, such as contracting, management and monitoring procedures of AVC, etc. Through the audit process, we can guarantee the effectiveness of such procedures that have been developed and implemented by the certification unit. 3. Not all interested parties are relevant, so measuring effectiveness is difficult. Instead of focusing on point 2.4.5, we must continue using the indicators of points 2.4.3 and 2.4.4, which already have several steps whose efficiency can be verified. 4. This is very complex. Companies cannot be "at the mercy" of the satisfaction of the plaintiffs.
288	2.4.4	<p>For indicator 2.4.5 the objections (producers) are supported- it is requested to eliminate it, since:</p> <ol style="list-style-type: none"> 1. The effectiveness of the complaint mechanism has been evaluated by the auditor (a) of the RSPO during the certification process and the audit of Annual surveillance. The PYCs of the RSPO have defined how the mechanism of complaints effectively by the certification unit should be developed and implemented. 2. The same scenario is also applied to other procedures required by the PyC of the RSPO, such as contracting, management and monitoring procedures of AVC, etc. Through the audit process, we can guarantee the effectiveness of the procedures that have been developed and implemented by the certification unit. 3. Not all interested parties are relevant, so measuring effectiveness is difficult. Instead of focusing on point 2.4.5, we must continue using the indicators of points 2.4.3 and 2.4.4, which already have several steps whose efficiency can be verified. 4. This is very complex. Companies cannot be "at the mercy" of the satisfaction of the plaintiffs. This is very complex. Companies cannot be "at the mercy" of the satisfaction of the plaintiffs. This is very complex. Companies cannot be "at the mercy" of the satisfaction of the plaintiffs.

#	Indicator	Comment (English)
289	2.4.4	<p>"The public consultation work document appears indicator 2.4.5 without resolving ""2.4.5 The effectiveness of the complaint mechanism will be evaluated in consultation with the interested parties every three years. The evaluations will be documented."" As a producer we agree to eliminate The indicator supporting the comments of the producers:</p> <ol style="list-style-type: none"> 1. The effectiveness of the complaint mechanism has been evaluated by the Auditor (a) of the RSPO during the certification process and the annual surveillance audit. The PYCs of the RSPO have defined how the mechanism of complaints effectively by the certification unit should be developed and implemented. 2. The same scenario is also applied to other procedures required by the PyC of the RSPO, such as contracting, management and monitoring procedures of AVC, etc. Through the audit process, we can guarantee the effectiveness of such procedures that have been developed and implemented by the certification unit. 3. Not all interested parties are relevant, so measuring effectiveness is difficult. Instead of focusing on point 2.4.5, we must continue using the indicators of points 2.4.3 and 2.4.4, which already have several steps whose efficiency can be verified. 4. This is very complex. Companies cannot be ""at the mercy"" of the satisfaction of the plaintiffs. """"
290	2.4.4	<p>"The process methodology must be evaluated because an interested party that does not receive a satisfactory response but that is correct, fair and legal can poorly qualify the evaluation of the mechanism. The objection is supported:</p> <p>Objection (producers):</p> <ol style="list-style-type: none"> 1. The effectiveness of the complaint mechanism has been evaluated by the Auditor (a) of the RSPO during the certification process and the annual surveillance audit. The PYCs of the RSPO have defined how the mechanism of complaints effectively by the certification unit should be developed and implemented. 2. The same scenario is also applied to other procedures required by the PyC of the RSPO, such as contracting, management and monitoring procedures of AVC, etc. Through the audit process, we can guarantee the effectiveness of such procedures that have been developed and implemented by the certification unit. 3. Not all interested parties are relevant, so measuring effectiveness is difficult. Instead of focusing on point 2.4.5, we must continue using the indicators of points 2.4.3 and 2.4.4, which already have several steps whose efficiency can be verified. 4. This is very complex. Companies cannot be ""at the mercy"" of the satisfaction of the plaintiffs."
291	2.5	This procedure will be co-written with the relevant external stakeholders to ensure their agreement and understanding.
292	2.5	This procedure will be co-written with the relevant external stakeholders to ensure their agreement and understanding.
293	2.5	This procedure will be co-written with the relevant external stakeholders to ensure their agreement and understanding.
294	2.5	This procedure will be co-written with the relevant external stakeholders to ensure their agreement and understanding.

#	Indicator	Comment (English)
295	2.5	<p>"[HRSS] Propose to consolidate the prevention against retaliation in P2 and P4 as follows:</p> <p>Criteria 2.5 The Unit of Certification upholds human rights and is prohibited from retaliating against Human Rights Defenders, Whistleblowers and Community spokespersons.</p> <p>Indicator 2.5.1 (C) 2.5.1(C) A policy to respect the human rights of Communities, Workers, Workforce, Smallholders, Suppliers, Human Rights Defenders and Stakeholders shall be established and implemented by the Unit of Certification and its contracted security services (including private military and security companies). This policy shall follow RSPO's policy on Human Rights Defenders and include the prohibition of:</p> <ul style="list-style-type: none"> (a) Retaliation (b) Intimidation, harassment and threats (c) Violence (physical, sexual and gender-based) and torture (d) Exploitation (e) Discrimination (access to employment, education and training) (f) Detention, disappearance and killing. <p>This policy shall also outline access to the established grievance mechanism and remediation. It shall be made publicly available and socialised to all Stakeholders (including Affected Communities, Smallholders, Workers) in a language understood by them.</p> <p>"</p>
296	2.5.1	<p>"2.5.1 Is there an indication that RSPO is allowing private military forces to be hired? We are aware that this is a global standard and if you have to hire private military forces, then the situation is probably unacceptable for plantation development. We would assume that the implementation of sustainability in oil palm plantations is to create a harmonious situation where RSPO subscribes to the Triple Bottom Line concept. This badly framed indicator presents a scenario where certificate holders are facing situations listed in the indicator. This is another woolly attempt of requiring a policy that addresses: Retaliation;(b) Intimidation, harassment, and threats;(c) Violence (physical, sexual, and gender-based) and torture; (d) Exploitation;(e) Discrimination - access to employment, education, and training; and(f) Detention, disappearance and killing.</p> <p>All of these have legal implications and then the solution if it ever were to happen is through a grievance mechanism, and should be made publically available. The indicator is weak and should and needs to be rephrased to make it practical. "</p>

#	Indicator	Comment (English)
297	2.5.1	This procedure may be amended from time to time as the need arises: new regulations (national or international), new grievances revealed, cases of conflict, etc.
298	2.5.1	This procedure may be amended from time to time as the need arises: new regulations (national or international), new grievances revealed, cases of conflict, etc.
299	2.5.1	This procedure may be amended from time to time as the need arises: new regulations (national or international), new grievances revealed, cases of conflict, etc.
300	2.5.1	"2.5.1: Sentences on (a)-(f) are removed because of the policy respect for human rights is clear and refers to the rules or applicable guidelines."
301	2.5.1	Indicator 2.5.1 A: proposed to be revised into acts of reply (except for the act of violation of law that can be proven)
302	2.5.1	2.5.1: Sentences on (a)-(f) are removed because the policy of respecting human rights is clear and refers to the applicable rules or guidelines.
303	2.5.1	2.5.1: Sentences on (a)-(f) are removed because the policy of respecting human rights is clear and refers to the applicable rules or guidelines.
304	2.5.1	Drafting proposal: 2.5.1 (c) The certification unit establishes and applies a policy of respect for the human rights of subcontracted personnel and workers, subcontracted services (including private security and military companies) suppliers, communities, defenders of the human rights and other interested parties. This policy will include the prohibition of: (a) reprisals; (b) intimidation, harassment and threats; (c) violence (physical, sexual and gender) and torture; (d) exploitation; (e) Discrimination - Access to employment, education and training; and (f) detention, disappearance and murder. This policy will also describe access to the complaint mechanism and established remediation. This policy will be publicly available and will be disclosed at all levels of the workforce and operations in a language they understand.
305	2.5.1	Conclusion: 2.5.1. and 2.5.2. Prioritize the part of subcontractors for being a very broad issue, it is requested that the company can be allowed to carry out a risk assessment matrix, in order to determine which subcontracted companies can violate human rights and thus be able to demand compliance.
306	2.5.1	2.5.1 Prioritize the subcontracted parts with more vulnerability creating a matrix to measure the risks to choose them ..
307	2.5.1	Drafting proposal: 2.5.1 (c) The certification unit establishes and applies a policy of respect for the human rights of subcontracted personnel and workers, subcontracted services (including private security and military companies) suppliers, communities, defenders of the human rights and other interested parties. This policy will fulfill the prohibition of: (a) reprisals; (b) intimidation, harassment and threats; (c) violence (physical, sexual and gender) and torture; (d) exploitation; (e) Discrimination - Access to employment, education and training; and (f) detention, disappearance and murder. This policy will also describe access to the complaint mechanism and established remediation.

#	Indicator	Comment (English)
308	2.5.1	<p>"Writing proposal: 2.5.1 (c) The Certification Unit establishes and applies a policy of respect for human rights of subcontract personnel and workers, subcontracted services (including private security and military companies) suppliers, communities, defenders of human rights and other other rights and other concerned parties. This policy will include the prohibition of:</p> <ul style="list-style-type: none"> (a) reprisals; (b) intimidation, harassment and threats; (c) violence (physical, sexual and gender) and torture; (d) exploitation; (e) Discrimination - Access to employment, education and training; and (f) detention, disappearance and murder. <p>This policy will also describe access to the complaint mechanism and established remediation. This policy will be publicly available and will be disclosed at all levels of the workforce and operations in a language they understand. "</p>
309	2.5.1	<p>" 1. Specify that the policy must be generated by the UDC and communicate it to interested parties including subcontractors. It is not viable to require a policy with each subcontractor, the writing does not seem clear in this aspect." "</p>
310	2.5.1	<p>"Improve the writing to clarify that the UDC policy must be adopted by contractors: 2.5.1 (c) The Certification Unit will establish and apply a policy of respect for the human rights of subcontracted personnel and workers, and their subcontracted services (including security and private military companies) suppliers, communities, defenders of human rights and other interested parties. This policy will include the prohibition of:</p> <ul style="list-style-type: none"> (a) reprisals; (b) intimidation, harassment and threats; (c) violence (physical, sexual and gender) and torture; (d) exploitation; (e) Discrimination - Access to employment, education and training; and (f) detention, disappearance and murder. <p>This policy will also describe access to the complaint mechanism and established remediation. This policy will be publicly available and will be disclosed at all levels of the workforce and operations in a language they understand. "</p>

#	Indicator	Comment (English)
311	2.5.1	<p>"Improve the writing to clarify that the UDC policy must be adopted by contractors: 2.5.1 (c) The Certification Unit will establish and apply a policy of respect for the human rights of subcontracted personnel and workers, and their subcontracted services (including security and private military companies) suppliers, communities, defenders of human rights and other interested parties. This policy will include the prohibition of:</p> <ul style="list-style-type: none"> (a) reprisals; (b) intimidation, harassment and threats; (c) violence (physical, sexual and gender) and torture; (d) exploitation; (e) Discrimination - Access to employment, education and training; and (f) detention, disappearance and murder. <p>This policy will also describe access to the complaint mechanism and established remediation. This policy will be publicly available and will be disclosed at all levels of the workforce and operations in a language they understand."</p>

#	Indicator	Comment (English)
1	3.1	This assessment must be undertaken with the help of external stakeholders, notably representatives of civil society and local smallholders or villagers - but also representatives of environmental and social rights. A basic template should be made available with the same threshold requirements - this template will be adapted according to local environmental and social issues.
2	3.1.1	3.1.1 There should be guidance on the minimum content of the business plan to make it auditable.
3	3.1.1	A guide to good farming practices should be available to all smallholders, in their own language, to help them find information.
4	3.1.1	A guide to good farming practices should be available to all smallholders, in their own language, to help them find information.
5	3.1.1	<p>"A guide to good farming practices should be made available to all smallholders (2-3 ha), in their own language, to help them find information.</p> <p>These guidelines should result from the work of a panel of relevant players.</p> <p>A mapping of existing approaches to small-scale replanting is already underway; building on these studies could be a first step.</p> <p>Overall planning support should be provided - depending on the scale and nature of the activities.</p> <p>Representatives of smallholders and schemes should be included in these discussions to validate the relevance of key performance indicators.</p> <p>The model should be regularly re-evaluated with a panel of exporters, depending on the geographical area under consideration and the local social situation.</p> <p>We acknowledge the fact training programs should be made accessible to all workers, we suggest to specify it includes migrant workers, or illiterate workers"</p>
6	3.1.1	A guide to good farming practices should be available to all smallholders, in their own language, to help them find information.
7	3.1.2	3.1.2 This requirement should only be for estates and for smallholders, something else needs to be considered through a stakeholder consultative exercise.
8	3.1.2	<p>""3.1.2. How does this expectation apply to SH?</p> <p>Guidance should be given, maybe a taskforce should be established to bring solutions to SH notably under 2 to 3 ha SH.</p> <p>A mapping of existing approaches to small scale replanting are already on-going, building on such studies could be a first step""</p>
9	3.1.2	<p>"3.1.2. How does this expectation apply to SH?</p> <p>Guidance should be given, maybe a taskforce should be established to bring solutions to SH notably under 2 to 3 ha SH.</p> <p>A mapping of existing approaches to small scale replanting are already on-going, building on such studies could be a first step"</p>
10	3.1.2	<p>"How does this expectation apply to SH?</p> <p>Guidance should be given, maybe a taskforce should be established to bring solutions to SH notably under 2 to 3 ha SH.</p> <p>A mapping of existing approaches to small scale replanting are already on-going, building on such studies could be a first step"</p>

#	Indicator	Comment (English)
11	3.1.2	"3.1.2. How does this expectation apply to SH? Guidance should be given, maybe a taskforce should be established to bring solutions to SH notably under 2 to 3 ha SH. A mapping of existing approaches to small scale replanting are already on-going, building on such studies could be a first step"
12	3.1.3	Planned intervals? Appropriate to scale of operations? Open to interpretation. Make it an annual audit and keep it simple.
13	3.1.3	"3.1.3 What should be the frame of the management review and what should be the minimum content of the review for auditing purposes?"
14	3.1.3	"A guide should be published to identify the various cases and provide overall planning assistance - depending on the scale and nature of the activities."
15	3.1.3	A guide should be published to identify the various cases and provide overall planning assistance - depending on the scale and nature of the activities.
16	3.1.3	A guide should be published to identify the various cases and provide overall planning assistance - depending on the scale and nature of the activities.
17	3.1.3	definition of "management review"
18	3.1.3	A guide should be published to identify the various cases and provide overall planning assistance - depending on the scale and nature of the activities.
19	3.2.1	"Proposal for multi-stakeholder co-construction, in particular with smallholders, of KPIs to objectively assess progress and, if necessary, provide operational assistance on plantations."
20	3.2.1	Proposal for multi-stakeholder co-construction, in particular with smallholders, of KPIs to objectively assess progress and, if necessary, provide operational assistance on plantations.
21	3.2.1	Proposal for multi-stakeholder co-construction, in particular with smallholders, of KPIs to objectively assess progress and, if necessary, provide operational assistance on plantations.
22	3.2.1	Proposal for multi-stakeholder co-construction, in particular with smallholders, of KPIs to objectively assess progress and, if necessary, provide operational assistance on plantations.
23	3.2.1	3.2.1 This indicator is not in accordance with the requirements of the criteria. The spirit of continuous improvement in key elements of sustainability is not being promoted through this indicator. The focus of only impacts is misleading.
24	3.2.1	The translation of "continuous improvement" was proposed to be changed to "ongoing improvement"
25	3.2.1	"Proposal: Indicator 3.2.1 (c) is proposed that the translation ""continuous improvement"" is changed to ""ongoing improvement""."
26	3.2.1	Proposed Indicator 3.2.1: Translation of "Continuous Improvement" Proposed to be changed to "Sustainable Improvement"
27	3.2.1	Indicator 3.2.1 (c) is proposed that the translation "continuous improvement" is changed to "ongoing improvement".
28	3.2.1	The translation of "continuous improvement" was proposed to be changed to "ongoing improvement"

#	Indicator	Comment (English)
29	3.2.1	Proposed on indicators 3.2.1: The sentence translation "Continuous Improvement" should be changed to "ongoing improvement"
30	3.2.1	Proposal 3.2.1: The translation sentence "Continuous Improvement" is proposed to be changed to "Sustainable Improvement"
31	3.2.1	Proposed 3.2.1: Translation "Continuous Improvement" proposed to be changed to "Sustainable Improvement"
32	3.2.1	In indicator 3.2.1 for the translation "Continuous Improvement" proposes to be changed to "Sustainable Improvement"
33	3.2.1	"Proposed Indicator 3.2.1: The translation of ""continuous improvement"" was proposed to be changed to ""ongoing improvement"""
34	3.2.1	Proposal for 3.2.1 (c): the translation of "continuous improvement" proposed to be changed to "ongoing improvement"
35	3.2.1	"Proposed Indicator 3.2.1: The translation of ""continuous improvement"" was proposed to be changed to ""ongoing improvement"""
36	3.2.1	The translation of "continuous improvement" was proposed to be changed to "ongoing improvement"
37	3.2.1	3.2.1-Translation of "Continuous Improvement" is proposed to be converted into "Sustainable Improvement"
38	3.2.1	3.2.1 Translation "Continuous Improvement" Proposed to be changed to "Sustainable Improvement"
39	3.2.1	"Comment: The translation of ""continuous improvement"" was proposed to be changed to ""ongoing improvement"" Proposed changes: 3.2.1 (c) The action plan for continuous improvement is carried out based on consideration of various social and main environmental impacts as well as various opportunities from the certification unit."
40	3.2.1	"Proposed for indicators 3.2.1: The translation of ""continuous improvement"" was converted into ""ongoing improvement"""
41	3.2.1	"3.2.1. The translation of ""continuous improvement"" was proposed to be changed to ""ongoing improvement"""
42	3.2.1	"Proposal: The translation of ""continuous improvement"" was proposed to be changed to ""ongoing improvement"""
43	3.2.1	"Indicator 3.2.1 Proposed: The translation of ""continuous improvement"" was proposed to be changed to ""ongoing improvement"""
44	3.2.2	3.2.2 The RSPO metrics are weak and do not support the important key elements in sustainability.
45	3.2.2	The template should be regularly re-evaluated with a panel of experts relevant to the geographical area under consideration and the local social situation.
46	3.2.2	The template should be regularly re-evaluated with a panel of experts relevant to the geographical area under consideration and the local social situation.

#	Indicator	Comment (English)
47	3.2.2	The template should be regularly re-evaluated with a panel of experts relevant to the geographical area under consideration and the local social situation.
48	3.2.2	"Proposed indicator 3.2.2: so that the indicator is deleted, because: 1. Filling Matric Template is a duplication of documentation of fulfilling P&C RSPO 2. Actually, the matric template filling is not sent to the RSPO Secretariat, but is delivered to the Auditor of the Certification Institute"
49	3.2.2	"Propose indicators to be deleted, because: 1. Filling Matric Template is a duplication of documentation of fulfilling P&C RSPO 2. Actually, the matric template filling is not sent to the RSPO Secretariat, but is delivered to the Auditor of the Certification Institute"
50	3.2.2	Proposal: Proposing Indicators 3.2.2 Deleted, because: 1. Filling Matric Template is a duplication of the Documentation of Fulfillment of P&C RSPO 2. Actual, the matric template contents are not sent to the RSPO Secretariat, but submitted to the Auditor of the Certification Institute
51	3.2.2	Propose indicators to be deleted, because: 1. Filling Matric Template is a duplication of the Documentation of Fulfillment
52	3.2.2	"Proposal 3.2.2 Elimination of Indicators due to: 1. Filling Matric Template is a duplication of documentation of fulfilling P&C RSPO 2. Actually, the matric template filling is not sent to the RSPO Secretariat, but is delivered to the Auditor of the Certification Institute"
53	3.2.2	"3.2.2: The indicator is deleted because based on RSPO Interpretation Forum at KL, 15-16 May 2023 will developed into a metric monitoring dashboard."
54	3.2.2	"3.2.2: The indicator is deleted because based on RSPO Interpretation Forum at KL, 15-16 May 2023 will developed into a metric monitoring dashboard."
55	3.2.2	This indicator is recommended to be abolished. In accordance with the RSPO Interpretation Forum in KL, 15-16 May 2023 will be developed into a Metric Monitoring Dashboard.
56	3.2.2	"Proposed 3.2.2: Indicators are deleted, because: 1. Filling Matric Template is a duplication of documentation of fulfilling P&C RSPO 2. Actually, the matric template filling is not sent to the RSPO Secretariat, but is delivered to the Auditor of the Certification Institute"
57	3.2.2	"3.2.2 - Proposed so that the indicator is deleted, because: 1. Filling Matric Template is a duplication of documentation of fulfilling P&C RSPO 2. Actually, the matric template filling is not sent to the RSPO Secretariat, but is delivered to the Auditor of the Certification Institute"

#	Indicator	Comment (English)
58	3.2.2	"Proposed Indicator 3.2.2: Propose indicators to be deleted, because: 1. Filling Matric Template is a duplication of documentation of fulfilling P&C RSPO 2. Actually, the matric template filling is not sent to the RSPO Secretariat, but is delivered to the Auditor of the Certification Institute"
59	3.2.2	"Proposed for indicators 3.2.2: Propose indicators to be deleted, because: 1. Filling Matric Template is a duplication of documentation of fulfilling P&C RSPO 2. Actually, the matric template filling is not sent to the RSPO Secretariat, but is delivered to the Auditor of the Certification Institute"
60	3.2.2	In indicator 3.2.2 it is proposed to be deleted because the matric template is a duplication of the documentation of the fulfillment of the RSPO P&C in addition to the Matric Template is not sent to the RSPO Secretariat, but was conveyed to the Auditor of the Certification Institute
61	3.2.2	3.2.2: The indicator is deleted because based on RSPO Interpretation Forum in KL, May 15-16 2023 will be developed into a metric monitoring dashboard.
62	3.2.2	"Indicator 3.2.2 is proposed to: abolished because: 1. Filling Matric Template is a duplication of the Documentation of Fulfillment of P&C RSPO. 2. Actually, the matric template is not sent to the RSPO Secretariat, but is delivered to the Auditor of the Certification Institute."
63	3.2.2	[Jakarta WS] 3.2.2 to be removed - metrication data needed should be captured through audit report. Auditor should make these data available to RSPO Secretariat.
64	3.2.2	"Proposed Indicator 3.2.2: Propose indicators to be deleted, because: 1. Filling Matric Template is a duplication of documentation of fulfilling P&C RSPO 2. Actually, the matric template filling is not sent to the RSPO Secretariat, but is delivered to the Auditor of the Certification Institute"
65	3.2.2	"Proposal: Propose indicators to be deleted, because: 1. Filling Matric Template is a duplication of documentation of fulfilling P&C RSPO 2. Actually, the matric template filling is not sent to the RSPO Secretariat, but is delivered to the Auditor of the Certification Institute"
66	3.2.2	"Indicator 3.2.2 Proposed: Propose indicators to be deleted, because: 1. Filling Matric Template is a duplication of documentation of fulfilling P&C RSPO 2. Actually, the matric template filling is not sent to the RSPO Secretariat, but is delivered to the Auditor of the Certification Institute"

#	Indicator	Comment (English)
67	3.2.2	Indicator 3.2.2 is proposed to be deleted because: 1. Filling Matric Template is a duplication of the documentation of Fulfillment of P&C RSPO. 2. Actually, the matric template is not sent to the RSPO Secretariat, but is delivered to the Auditor of the Certification Institute.
68	3.2.2	"This indicator should be removed, because: 1. Filling Matric Template is a duplication of the documentation of fulfilling P&C RSPO; 2. Actually, the matric template filling is not sent to the RSPO Secretariat, but is delivered to the Auditor of the Certification Institute"
69	3.2.2	3.2.2 RSPO Metric Templates to be deleted because all information regarding the performance unit of certification already exists in the Annual RSPO audit report and initial data information (Basic Info) that is always requested by the Certification Agency to the Certification Unit every before the annual audit implementation. This is also to avoid the substance of data that may be different between Basic Info and RSPO Metric Templates.
70	3.2.2	Clarify who is responsible for submitting these annual reports to RSPO.
71	3.2.2	3.2.2 Describe what temporality should be presented to the Secretariat, prior to the audit or as part of the COP
72	3.2.2	It is a minor indicator, but in practice it is a larger indicator since RSPO requires the certification entities that to request the license of the certification unit in Palm Trace, the metric template is uploaded and clarify who is responsible for submitting these reports annual to the secretariat of the RSPO.
73	3.2.2	Clarify who is responsible for submitting these annual reports to the secretariat of the RSPO.
74	3.3	"We need to ensure that smallholders have access to information, to ensure that procedures are properly followed."
75	3.3	We need to ensure that smallholders have access to information, to ensure that procedures are properly followed.
76	3.3	We need to ensure that smallholders have access to information, to ensure that procedures are properly followed.
77	3.3	We need to ensure that smallholders have access to information, to ensure that procedures are properly followed.
78	3.3.1	3.3.1 There should be a statement addressing the spread of SOPs required. The minimum requirement should be SOPs for all activities required for promoting sustainability.
79	3.3.1	"1. The word ""validity"" is mistaken for the translation, it should be ""available"" 2. Available SOPs in the Certification Unit"
80	3.3.1	3.3.1 -The word "enactment" is not quite right, it should be "available" -> SOP available in the certification unit
81	3.3.1	"Proposed 3.3.1: 1. The word ""validity"" is mistaken for the translation, it should be ""available"" 2. Available SOPs in the Certification Unit"
82	3.3.1	Proposed Indicator 3.3.1: 1. It is necessary to change the word "valid" to "available"

#	Indicator	Comment (English)
83	3.3.1	"Proposed 3.3.1: 1. The word ""validity"" is mistaken for the translation, it should be ""available"" 2. Available SOPs in the Certification Unit"
84	3.3.1	"Indicator 3.3.1 (c) Proposed for: 1. The word ""enactment"" SOP in the certification unit is changed to ""available"" because of the wrong translation. So that the sentence becomes ""available Standard Operating Procedures (SOP) for the Certification Unit""."
85	3.3.1	"In indicators 3.3.1 1. The word ""validity"" is mistaken for the translation, it should be ""available"" 2. Available SOPs in the Certification Unit"
86	3.3.1	"Proposed 3.3.1 (c): 1. The word ""validity"" is mistaken for the translation, it should be ""available"" 2. Available SOPs in the Certification Unit"
87	3.3.1	"Comment: Translation in the language version needs to be improved Proposed changes: 3.3.1 (c) Available Standard Operating Procedures (SOP) for the Certification Unit."
88	3.3.1	Indicator 3.3.1 (c) Proposed in order to: 1. The word "validy" SOP in the certification unit is changed to "available" because of the wrong translation. So that the sentence becomes "available Standard Operating Procedures (SOP) for the Certification Unit".
89	3.3.1	Proposal 3.3.1: The word "validity" is wrong with the translation, it should be "available", so that the indicator sentence changes to "3.3.1 (c) Available Standard Operating Procedures (SOP) for the Certification Unit"
90	3.3.1	"The entry into force" was changed to "the availability".
91	3.3.1	"Indicator proposal 3.3.1: 1. The word ""validity"" is mistaken for the translation, it should be ""available"" 2. SOP is available in the certification unit."
92	3.3.1	"Comment: Translation in the language version needs to be improved. Proposed changes: 3.3.1 (c) Available Standard Operating Procedures (SOP) in the Certification Unit."
93	3.3.1	"The entry into force" was changed to "the availability".

#	Indicator	Comment (English)
94	3.3.1	"Indicator proposal 3.3.1: 1. The word ""validity"" is mistaken for the translation, it should be ""available"" 2. Available SOPs in the Certification Unit"
95	3.3.1	"Indicator 3.3.1 Proposed: 1. The word ""validity"" is mistaken for the translation, it should be ""available"" 2. Available SOPs in the Certification Unit"
96	3.3.2	3.3.2 How is this auditable? What would be the mechanism to check consistency? And what is the assurance that the SOP is appropriate?
97	3.3.2	"Comment: Translation in the language version needs to be improved Proposed changes: 3.3.2 There is a mechanism to ensure the implementation of the procedure consistently."
98	3.3.2	Indicator 3.3.2 is proposed to: The word "enactment" is changed "because of the wrong translation. So that the sentence becomes "There is a mechanism to check the implementation of the procedure consistently".
99	3.3.2	3.3.2 -The word "validity" is not quite right, it should be "available" -> There is a mechanism to check the implementation of the procedure consistently
100	3.3.2	"Indicator 3.3.2 Proposed: 1. The word ""validity"" is mistaken for the translation, it should be ""available"" 2. A mechanism is available to check the implementation of procedures consistently"
101	3.3.2	"1. The word ""validity"" is mistaken for the translation, it should be ""available"" 2. A mechanism is available to check the implementation of procedures consistently"
102	3.3.2	"In indicator 3.3.2 1. The word ""validity"" is mistaken for the translation, it should be ""available"" 2. A mechanism is available to check the implementation of procedures consistently"
103	3.3.2	"Indicator proposal 3.3.2: 1. The word ""validity"" is mistaken for the translation, it should be ""available"" 2. A mechanism is available to check the implementation of procedures consistently"
104	3.3.2	"Comment: Translation in the language version needs to be improved Proposed changes: 3.3.2 There is a mechanism to ensure the implementation of procedures consistently."

#	Indicator	Comment (English)
105	3.3.2	"Proposed 3.3.2: 1. The word ""validity"" is mistaken for the translation, it should be ""available"" 2. A mechanism is available to check the implementation of procedures consistently"
106	3.3.2	"Proposed and comments: Propose indicators to be deleted, because: 1. Filling Matric Template is a duplication of documentation of fulfilling P&C RSPO 2. Actually, the matric template filling is not sent to the RSPO Secretariat, but is delivered to the Auditor of the Certification Institute"
107	3.3.2	"Indicator 3.3.2 is proposed to: The word ""entry into force"" replaced ""is available"" because of the wrong translation. So that the sentence becomes ""There is a mechanism to check the implementation of the procedure consistently""."
108	3.3.2	"The entry into force" was changed to "the availability".
109	3.3.2	Proposed Indicator 3.3.2: 1. The word "enactment" is wrong with the translation, it should be "available" 2. A mechanism is available to check the implementation of the procedure consistently
110	3.3.2	"Indicator proposal 3.3.2: 1. The word ""validity"" is mistaken for the translation, it should be ""available"" 2. A mechanism is available to check the implementation of procedures consistently"
111	3.3.2	"Indicator proposal 3.3.2: 1. The word ""validity"" is mistaken for the translation, it should be ""available"" 2. A mechanism is available to check the implementation of procedures consistently"
112	3.3.3	3.3.3 What is the minimum period of monitoring? Should the monitoring be done annually?
113	3.3.3	Proposed changes in indicators 3.3.1: 1. It should be the sentence "provided and managed" changed to the phrase "maintained and available" so that the sentence becomes "recording of monitoring and actions taken and available".
114	3.3.3	"Comment: Translation in the language version needs to be improved Proposed changes: 3.3.3 Records of monitoring and actions taken are maintained and available."
115	3.3.3	"Indicator proposal 3.3.1: 1. Wrong translation, the phrase ""provided and managed"" changed to ""maintained and available"" 2. Records of monitoring and actions taken are maintained and available."
116	3.3.3	3.3.3 -Incorrect translation, the phrase "provided and managed" changed to "maintained and available" -> Records of monitoring and actions taken are maintained and available.

#	Indicator	Comment (English)
117	3.3.3	"Comment: Translation in the language version needs to be improved Proposed changes: 3.3.3 Records of monitoring and actions taken are maintained and available."
118	3.3.3	"Indicator 3.3.3 Proposed: 1. Wrong translation, the phrase ""provided and managed"" changed to ""maintained and available"" 2. Records of monitoring and actions taken are maintained and available."
119	3.3.3	"1. Wrong translation, the phrase ""provided and managed"" changed to ""maintained and available"" 2. Records of monitoring and actions taken are maintained and available."
120	3.3.3	"Proposed Indicator 3.3.3: 1. Wrong translation, the phrase ""provided and managed"" changed to ""maintained and available"" 2. Records of monitoring and actions taken are maintained and available."
121	3.3.3	"Indicator 3.3.3 Proposed for: 1. The sentence ""is provided and managed"" changed to ""maintained and available"". 2. Records of monitoring and actions taken are maintained and available."
122	3.3.3	"Indicator 3.3.3. 1. Wrong translation, the phrase ""provided and managed"" changed to ""maintained and available"" 2. Records of monitoring and actions taken are maintained and available."
123	3.3.3	"In indicator 3.3.3 1. Wrong translation, the phrase ""provided and managed"" changed to ""maintained and available"" 2. Records of monitoring and actions taken are maintained and available."
124	3.3.3	Indicator 3.3.3 Proposed in order to: 1. The sentence "is provided and managed" changed to "maintained and available". 2. Records of monitoring and actions taken are maintained and available.
125	3.3.3	Comment: Translation in the language version needs to be improved proposed changes: 3.3.3 Records of monitoring and actions taken are maintained and available.
126	3.3.3	"Proposed Indicator 3.3.3: 1. Wrong translation, the phrase ""provided and managed"" changed to ""maintained and available"" 2. Records of monitoring and actions taken are maintained and available."

#	Indicator	Comment (English)
127	3.3.3	"Proposed 3.3.3: 1. Wrong translation, the phrase ""provided and managed"" changed to ""maintained and available"" 2. Records of monitoring and actions taken are maintained and available."
128	3.4	"This assessment must be undertaken with the help of external stakeholders, notably representatives of civil society and local smallholders or villagers - but also representatives of environmental and social rights. A basic template should be made available with the same threshold requirements - this template will be adapted according to local environmental and social issues."
129	3.4	This assessment must be undertaken with the help of external stakeholders, notably representatives of civil society and local smallholders or villagers - but also representatives of environmental and social rights. A basic template should be made available with the same threshold requirements - this template will be adapted according to local environmental and social issues.
130	3.4	This assessment must be undertaken with the help of external stakeholders, notably representatives of civil society and local smallholders or villagers - but also representatives of environmental and social rights. A basic template should be made available with the same threshold requirements - this template will be adapted according to local environmental and social issues.
131	3.4	This assessment must be undertaken with the help of external stakeholders, notably representatives of civil society and local smallholders or villagers - but also representatives of environmental and social rights. A basic template should be made available with the same threshold requirements - this template will be adapted according to local environmental and social issues.
132	3.4	This assessment must be undertaken with the help of external stakeholders, notably representatives of civil society and local smallholders or villagers - but also representatives of environmental and social rights. A basic template should be made available with the same threshold requirements - this template will be adapted according to local environmental and social issues.
133	3.4	This assessment must be undertaken with the help of external stakeholders, notably representatives of civil society and local smallholders or villagers - but also representatives of environmental and social rights. A basic template should be made available with the same threshold requirements - this template will be adapted according to local environmental and social issues.
134	3.4	This assessment must be undertaken with the help of external stakeholders, notably representatives of civil society and local smallholders or villagers - but also representatives of environmental and social rights. A basic template should be made available with the same threshold requirements - this template will be adapted according to local environmental and social issues.
135	3.4	This assessment must be undertaken with the help of external stakeholders, notably representatives of civil society and local smallholders or villagers - but also representatives of environmental and social rights. A basic template should be made available with the same threshold requirements - this template will be adapted according to local environmental and social issues.
136	3.4	This assessment must be undertaken with the help of external stakeholders, notably representatives of civil society and local smallholders or villagers - but also representatives of environmental and social rights. A basic template should be made available with the same threshold requirements - this template will be adapted according to local environmental and social issues.

#	Indicator	Comment (English)
137	3.4	This assessment must be undertaken with the help of external stakeholders, notably representatives of civil society and local smallholders or villagers - but also representatives of environmental and social rights. A basic template should be made available with the same threshold requirements - this template will be adapted according to local environmental and social issues.
138	3.4	This assessment must be undertaken with the help of external stakeholders, notably representatives of civil society and local smallholders or villagers - but also representatives of environmental and social rights. A basic template should be made available with the same threshold requirements - this template will be adapted according to local environmental and social issues.
139	3.4	"3.4 The note section to be deleted because: <ul style="list-style-type: none"> • Indonesia has many regulations according to its level (Law to Ministerial Regulation). National interpretation will have difficulty identifying it. • There are different regional regulations according to each location • The dynamics of laws and regulations in Indonesia are very high (especially the addition of legislation) • All certification units have identified related laws and requirements in their respective locations • Important environmental and social impacts will be identified during the assessment process so that it does not need to be determined by the national interpretation "
140	3.4	[Abidjan WS] Criteria 3.4 - missing the word 'conducted' 'creation' before the wordings of before new plantings - translation issue
141	3.4.1	3.4.1 First of all, experience dictates, the social and environmental impacts should not be grouped together in 1 document, in the oil palm context. For established concessions, it is the social component that would probably change. From an environmental perspective, impacts are either mitigated or remediated and unless there are new additions to the concessions, these impacts would stabilize. So, requiring the generic SEIA document in most oil palm countries actually dilutes the social component which we believe is very crucial for sustainability.
142	3.4.1	3.4.1 First of all, experience dictates, the social and environmental impacts should not be grouped together in 1 document, in the oil palm context. For established concessions, it is the social component that would probably change. From an environmental perspective, impacts are either mitigated or remediated and unless there are new additions to the concessions, these impacts would stabilize. So, requiring the generic SEIA document in most oil palm countries actually dilutes the social component which we believe is very crucial for sustainability.
143	3.4.1	"3.4.1 We acknowledge the fact training programs should be made accessible to all workers, we suggest to specify it includes migrant workers, or illiterate workers"

#	Indicator	Comment (English)
144	3.4.1	<p>"A guide to good farming practices should be made available to all smallholders (2-3 ha), in their own language, to help them find information.</p> <p>These guidelines should result from the work of a panel of relevant players.</p> <p>A mapping of existing approaches to small-scale replanting is already underway; building on these studies could be a first step.</p> <p>Overall planning support should be provided - depending on the scale and nature of the activities.</p> <p>Representatives of smallholders and schemes should be included in these discussions to validate the relevance of key performance indicators.</p> <p>The model should be regularly re-evaluated with a panel of exporters, depending on the geographical area under consideration and the local social situation.</p> <p>We acknowledge the fact training programs should be made accessible to all workers, we suggest to specify it includes migrant workers, or illiterate workers</p> <p>"</p>
145	3.4.1	<p>"The template should be regularly re-evaluated with a panel of experts relevant to the geographical area under consideration and the local social situation."</p>
146	3.4.1	<p>"A guide to good farming practices should be made available to all smallholders (2-3 ha), in their own language, to help them find information.</p> <p>These guidelines should result from the work of a panel of relevant players.</p> <p>A mapping of existing approaches to small-scale replanting is already underway; building on these studies could be a first step.</p> <p>Overall planning support should be provided - depending on the scale and nature of the activities.</p> <p>Representatives of smallholders and schemes should be included in these discussions to validate the relevance of key performance indicators.</p> <p>The model should be regularly re-evaluated with a panel of exporters, depending on the geographical area under consideration and the local social situation.</p> <p>We acknowledge the fact training programs should be made accessible to all workers, we suggest to specify it includes migrant workers, or illiterate workers</p> <p>"</p>

#	Indicator	Comment (English)
147	3.4.1	<p>"A guide to good farming practices should be made available to all smallholders (2-3 ha), in their own language, to help them find information.</p> <p>These guidelines should result from the work of a panel of relevant players.</p> <p>A mapping of existing approaches to small-scale replanting is already underway; building on these studies could be a first step.</p> <p>Overall planning support should be provided - depending on the scale and nature of the activities.</p> <p>Representatives of smallholders and schemes should be included in these discussions to validate the relevance of key performance indicators.</p> <p>The model should be regularly re-evaluated with a panel of exporters, depending on the geographical area under consideration and the local social situation.</p> <p>We acknowledge the fact training programs should be made accessible to all workers, we suggest to specify it includes migrant workers, or illiterate workers</p> <p>"</p>
148	3.4.1	<p>"A guide to good farming practices should be made available to all smallholders (2-3 ha), in their own language, to help them find information.</p> <p>These guidelines should result from the work of a panel of relevant players.</p> <p>A mapping of existing approaches to small-scale replanting is already underway; building on these studies could be a first step.</p> <p>Overall planning support should be provided - depending on the scale and nature of the activities.</p> <p>Representatives of smallholders and schemes should be included in these discussions to validate the relevance of key performance indicators.</p> <p>The model should be regularly re-evaluated with a panel of exporters, depending on the geographical area under consideration and the local social situation.</p> <p>We acknowledge the fact training programs should be made accessible to all workers, we suggest to specify it includes migrant workers, or illiterate workers</p> <p>"</p>
149	3.4.1	<p>We acknowledge the fact training programs should be made accessible to all workers, we suggest to specify it includes migrant workers, or illiterate workers</p>
150	3.4.1	<p>3.4.1 We acknowledge the fact training programs should be made accessible to all workers, we suggest to specify it includes migrant workers, or illiterate workers</p>

#	Indicator	Comment (English)
151	3.4.1	We acknowledge the fact training programs should be made accessible to all workers, we suggest to specify it includes migrant workers, or illiterate workers
152	3.4.1	Proposed Indicator 3.4.1: The phrase "The Planning/Supplier Scheme Outside Fruit" is changed to "Plasma/Partnership Garden"
153	3.4.1	"Proposed Indicator 3.4.1: The phrase ""Fruit Planning/Supplier Scheme"" is changed to ""Plasma/Partnership Garden""
154	3.4.1	Proposal: The phrase "Fruit Planning/Supplier Scheme" is changed to "Plasma/Partnership Garden".
155	3.4.1	Indicator 3.4.1 (c) Proposed in order to: The phrase "Fruit Planning/Supplier Scheme" is changed to "Plasma/Partnership Garden"
156	3.4.1	Proposed Indicator 3.4.1 (c) Proposed to: The phrase "Fruit Planning/Supplier Scheme" is changed to "Plasma/Partnership Garden"
157	3.4.1	3.4.1: The term "Fruit Expert/Supplier Scheme" is changed to "Plasma/Partnership Garden"
158	3.4.1	3.4.1. Documented the Seia which was carried out through participatory methodologies and involved affected stakeholders along with the impact on schemes of the planters/suppliers outside the fruit on new operations or planting, including PKS.
159	3.4.1	"Comment: The phrase ""Fruit Planning/Supplier Scheme"" is changed to ""Plasma/Partnership Garden"" Proposed changes: 3.4.1 (c) Documented the Seia which is carried out through participatory methodologies and involves affected stakeholders along with the impact on plasma/partnership gardens on new operations or planting, including PKS."
160	3.4.1	Comment: The phrase "" Fruit Expert/Supplier Scheme "was changed to" Plasma/Partnership Garden "Proposed Change: 3.4.1 (c) It was documented through a participatory methodology and involved affected stakeholders along with the impact on the plasma/partnership garden on the operation/partnership on the operation or new planting, including PKS.
161	3.4.1	Proposed 3.4.1: The phrase "The Planning/Suppliers Scheme Outside the Fruit" is changed to "Plasma/Partnership Garden"
162	3.4.1	"Proposed 3.4.1 (c): The phrase ""Fruit Planning/Supplier Scheme"" is changed to ""Plasma/Partnership Garden""
163	3.4.1	The phrase "Fruit Planning/Supplier Scheme" is changed to "Plasma/Partnership Garden"
164	3.4.1	In indicators 3.4.1 The sentence "Expert Scheme/Outside Fruit Supplier" is changed to "Plasma/Partnership Garden"
165	3.4.1	3.4.1 - Sentence "The Fruit Planning/Supplier Scheme" was changed to "Plasma/Partnership Garden"
166	3.4.1	The phrase "Fruit Planning/Supplier Scheme" is changed to "Plasma/Partnership Garden"
167	3.4.1	"3.4.1: The term ""Fruit Expert/Supplier Scheme"" replaced Become a ""Plasma Garden/Partnership""
168	3.4.1	The phrase "Fruit Planning/Supplier Scheme" is changed to "Plasma/Partnership Garden"
169	3.4.1	Indicator 3.4.1 (c) Proposed in order to: The phrase "Fruit Planning/Supplier Scheme" is changed to "Plasma/Partnership Garden"

#	Indicator	Comment (English)
170	3.4.1	"Indicator 3.4.1 Proposed: The phrase ""Fruit Planning/Supplier Scheme"" is changed to ""Plasma/Partnership Garden"""
171	3.4.1	Keep in mind that the Spanish translation of the affected term, in Spanish has a negative connotation, we suggest using the impact (positive or negative) because it diverts the term used and in the principle 4 that in some cases is spoken of affected as affected as Negative is not coincident.
172	3.4.1	"I suggest: 3.4.1 (c) In new plantations or operations (including extractor plants and system producers) an EISA is documented independent, performed through a methodology Participatory that involves relevant interested parties. "
173	3.4.1	Keep in mind that the Spanish translation of the affected term, in Spanish has a negative connotation, we suggest using the term impacted.
174	3.4.1	Keep in mind that the Spanish translation of the affected term, in Spanish has a negative connotation, we suggest using the term impacted.
175	3.4.1	Keep in mind that the Spanish translation of the affected term, in Spanish has a negative connotation, we suggest using the term impacted because it diverts the term used to the error.
176	3.4.1	"[Abidjan WS] Criteria 3.4 - There is a need to provide Clear Clarity on the requirement of this impact assessment. There is different Between Seia and Esia (L'Eise versus i'eies) - In Cote d'Ivoire that is regulated under national regulation. Perhaps National Interpretation Can Address?"
177	3.4.2	3.4.2 It follows the above comment in 3.4.1. The social and environmental impacts should be considered separately for management purposes.

#	Indicator	Comment (English)
178	3.4.2	<p>"A guide to good farming practices should be made available to all smallholders (2-3 ha), in their own language, to help them find information.</p> <p>These guidelines should result from the work of a panel of relevant players.</p> <p>A mapping of existing approaches to small-scale replanting is already underway; building on these studies could be a first step.</p> <p>Overall planning support should be provided - depending on the scale and nature of the activities.</p> <p>Representatives of smallholders and schemes should be included in these discussions to validate the relevance of key performance indicators.</p> <p>The model should be regularly re-evaluated with a panel of exporters, depending on the geographical area under consideration and the local social situation.</p> <p>We acknowledge the fact training programs should be made accessible to all workers, we suggest to specify it includes migrant workers, or illiterate workers.</p> <p>"</p>
179	3.4.2	<p>"A guide to good farming practices should be made available to all smallholders (2-3 ha), in their own language, to help them find information.</p> <p>These guidelines should result from the work of a panel of relevant players.</p> <p>A mapping of existing approaches to small-scale replanting is already underway; building on these studies could be a first step.</p> <p>Overall planning support should be provided - depending on the scale and nature of the activities.</p> <p>Representatives of smallholders and schemes should be included in these discussions to validate the relevance of key performance indicators.</p> <p>The model should be regularly re-evaluated with a panel of exporters, depending on the geographical area under consideration and the local social situation.</p> <p>We acknowledge the fact training programs should be made accessible to all workers, we suggest to specify it includes migrant workers, or illiterate workers</p> <p>"</p>

#	Indicator	Comment (English)
180	3.4.2	<p>"A guide to good farming practices should be made available to all smallholders (2-3 ha), in their own language, to help them find information.</p> <p>These guidelines should result from the work of a panel of relevant players.</p> <p>A mapping of existing approaches to small-scale replanting is already underway; building on these studies could be a first step.</p> <p>Overall planning support should be provided - depending on the scale and nature of the activities.</p> <p>Representatives of smallholders and schemes should be included in these discussions to validate the relevance of key performance indicators.</p> <p>The model should be regularly re-evaluated with a panel of exporters, depending on the geographical area under consideration and the local social situation.</p> <p>We acknowledge the fact training programs should be made accessible to all workers, we suggest to specify it includes migrant workers, or illiterate workers</p> <p>"</p>
181	3.4.2	<p>"3.4.2: Add the word ""social"" to monitoring environment, to match the sentence in the English version, namely; 3.4.2 for the unit of certification, a seia is available and social and environmental management and Monitoring Plans have been developed with participation of Affected Stakeholders."</p>
182	3.4.2	<p>"Proposed for indicators 3.4.2: The sentence revision becomes ""for the certification unit, the seia is carried out and the planned management and monitoring of social and environmental compiled through the participation of affected stakeholders.""</p>
183	3.4.2	<p>"Proposed Indicator 3.4.2: Changing the phrase ""for the certification unit, the seia is carried out and the planned management and environmental monitoring is prepared through the participation of the stakeholders affected"" to be ""to be ""For the Certification Unit, the SEA is carried out and the planned management and social and environmental monitoring is prepared through the participation of affected stakeholders.""</p>
184	3.4.2	<p>"Proposed for indicators 3.4.2: Change the phrase ""for the certification unit, the seia is carried out and the planned management and environmental monitoring is prepared through the participation of the stakeholders affected"" to become ""For the Certification Unit, the SEA is carried out and the planned management and social and environmental monitoring is prepared through the participation of affected stakeholders.""</p>

#	Indicator	Comment (English)
185	3.4.2	"3.4.2 For the Certification Unit, the Seia is carried out and the planned management and environmental monitoring is prepared through the participation of affected stakeholders. Proposal: Changing the phrase ""For the Certification Unit, the Seia is carried out and the planned management and environmental monitoring is prepared through the participation of the stakeholders affected"" become ""For the Certification Unit, the SEA is carried out and the planned management and social and environmental monitoring is prepared through the participation of affected stakeholders.""
186	3.4.2	3.4.2. For the Certification Unit, the SEA is carried out and the planned management and environmental monitoring is prepared through the participation of affected stakeholders.
187	3.4.2	3.4.2: Add the word "social" to environmental monitoring, to match the sentence in the English version, namely; 3.4.2 for the unit of certification, a seia is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.
188	3.4.2	Proposal for 3.4.2: Changing the phrase "for the certification unit, the seia is carried out and the planned management and environmental monitoring is prepared through the participation of the affected stakeholders" to "for the certification unit, as well as the management and social and environmental monitoring plans are prepared through the participation of the stakeholders affected interests. "
189	3.4.2	"Indicator 3.4.2 is proposed to: The sentence ""for the certification unit, the seia is carried out and the planned management and environmental monitoring is prepared through the participation of the stakeholders affected"" into ""For the Certification Unit, the SEA is carried out and the planned management and social and environmental monitoring is prepared through the participation of affected stakeholders.""
190	3.4.2	"Change the phrase ""for the certification unit, the seia is carried out and the planned management and environmental monitoring is prepared through the participation of the stakeholders affected"" to become ""For the Certification Unit, the SEA is carried out and the planned management and social and environmental monitoring is prepared through the participation of affected stakeholders.""
191	3.4.2	"Indicator 3.4.2 Proposed: Change the phrase ""for the certification unit, the seia is carried out and the planned management and environmental monitoring is prepared through the participation of the stakeholders affected"" to become ""For the Certification Unit, the SEA is carried out and the planned management and social and environmental monitoring is prepared through the participation of affected stakeholders.""

#	Indicator	Comment (English)
192	3.4.2	"In indicators 3.4.2 Changing the phrase ""for the certification unit, the seia is carried out and the planned management and environmental monitoring is prepared through the participation of the stakeholders affected"" to be ""to be ""For the Certification Unit, the SEA is carried out and the planned management and social and environmental monitoring is prepared through the participation of affected stakeholders.""
193	3.4.2	"3.4.2 Changing the phrase ""For the Certification Unit, the Seia is carried out and the planned management and environmental monitoring is prepared through the participation of the stakeholders. ""For the Certification Unit, the SEA is carried out and the planned management and social and environmental monitoring is prepared through the participation of affected stakeholders.""
194	3.4.2	Improve sentences so that "Management and Monitoring Plans" also embellish "social" aspects and not environmental sajes
195	3.4.2	"Proposed 3.4.2: Change the phrase ""for the certification unit, the seia is carried out and the planned management and environmental monitoring is prepared through the participation of the stakeholders affected"" to become ""For the Certification Unit, the SEA is carried out and the planned management and social and environmental monitoring is prepared through the participation of affected stakeholders.""
196	3.4.2	"Comment: Changing the sentence of environmental monitoring into ""social and environmental monitoring"" Proposed change For the Certification Unit, the Seia is carried out and the planned management and monitoring of social and environment]"
197	3.4.2	Changing the phrase "For the Certification Unit, the Seia is carried out and the planned management and environmental monitoring is prepared through the participation of affected stakeholders" to "for the certification unit, the seia is carried out as well as the management and environmental and environmental monitoring plans are prepared through the participation of affected stakeholders."
198	3.4.2	"Proposed 3.4.2: Changing the phrase ""For the Certification Unit, SEA is carried out and the planned management and environmental monitoring is prepared through the participation of affected stakeholders"" to: ""for the certification unit, the seia is carried out and the planned management and social and environmental monitoring of the environmental stakeholders.""
199	3.4.2	"3.4.2 - Changing the phrase ""for the certification unit, the seia is carried out and the planned management and environmental monitoring is prepared through the participation of the stakeholders. ""For the Certification Unit, the SEA is carried out and the planned management and social and environmental monitoring is prepared through the participation of affected stakeholders.""

#	Indicator	Comment (English)
200	3.4.2	"3.4.2: Changing the phrase ""for the certification unit, the sea is carried out and the planned management and environmental monitoring is prepared through the participation of the stakeholders." ""For the Certification Unit, the SEA is carried out and the planned management and social and environmental monitoring is prepared through the participation of affected stakeholders.""
201	3.4.2	"Proposed Indicator 3.4.2: Change the phrase ""for the certification unit, the sea is carried out and the planned management and environmental monitoring is prepared through the participation of the stakeholders affected"" to become ""For the Certification Unit, the SEA is carried out and the planned management and social and environmental monitoring is prepared through the participation of affected stakeholders.""
202	3.4.2	"3.4.2. Replace the phrase ""for the certification unit, the sea is carried out and the planned management and environmental monitoring is prepared through the participation of the stakeholders affected"" into ""For the Certification Unit, the SEA is carried out and the planned management and social and environmental monitoring is prepared through the participation of affected stakeholders.""
203	3.4.2	Keep in mind that the Spanish translation of the affected term, in Spanish has a negative connotation, we suggest using the term impacted.
204	3.4.2	Keep in mind that the Spanish translation of the affected term, in Spanish has a negative connotation, we suggest using the impact (positive or negative) because it diverts the term used and in the principle 4 that in some cases is spoken of affected as affected as Negative is not coincident.
205	3.4.2	Keep in mind that the Spanish translation of the affected term, in Spanish has a negative connotation, we suggest using the term impacted
206	3.4.2	Keep in mind that the Spanish translation of the affected term, in Spanish has a negative connotation, we suggest using the term impacted.
207	3.4.3	3.4.3 Please define regularly? 6 months, 1 year, or 2 years etc. As mentioned earlier, these the environmental and social plan should be separated.
208	3.4.3	[Accra WS] Defined what is regulated updated - should state updated every 5 years or in accordance to national regulation. (NI to also defined clearly the update frequency as per national regulation).
209	3.4.3	Include that the periodicity of monitoring is every two years.
210	3.4.3	Define that the periodicity of monitoring is every two years
211	3.4.3	3.4.3 Define that period is considered
212	3.4.3	Clarify the revision and update times of EISA management plans include a suggested time.

#	Indicator	Comment (English)
213	3.4.3	"3.4.3 and 3.4.4. They are related and I think the other way around: the social and environmental impact assessment is carried out once and their plans are updated every two years. In the event that there is a change in the EISA findings (impacts), such evaluation is updated. These independent evaluations are expensive and it would be unsustainable to do them periodically."
214	3.4.3	3.4.3. Define that the period must be every 2 years.
215	3.4.3	Include that the periodicity of monitoring is every two years.
216	3.4.3	Define that the periodicity of monitoring is every two years
217	3.4.3	"[Abidjan WS] 3.4.3 (c) To include requirement on communication - Remove the requirement from 3.4.4 on 'this seia shall be provided to all affected communities in a form and Language Understood by all parts included vulnerable and Illiterate Groups. ' To 3.4.3 (C)"
218	3.4.3	[Abidjan WS] 3.4.3(C) To define 'update regularly' - propose to state review to be done every 3-years and/or based on National Interpretation.
219	3.4.4	3.4.4 Need to rethink this. In most cases, especially for established estates, the impacts would remain the same. An SEIA would only be necessary if there are significant changes in the project. The 2-year reassessment requirement is based on ignorance and a lack of understanding the palm oil industry.
220	3.4.4	[Accra WS] 3.4.4 removed the first sentence - as it is captured under 3.4.3 - redundant. And it should stated a summary of the SEIA and its monitoring and management plan shall be provided.... groups. SEIA often is a long documents (more than 200 pages)
221	3.4.4	"This review will be carried out with the participation of relevant external stakeholders. "
222	3.4.4	These documents are usually 200+ pages, and providing them in full to stakeholders may not be practicable. A summary, or the SEIA Management Plan would be more logical.
223	3.4.4	This review will be carried out with the participation of relevant external stakeholders.
224	3.4.4	Instead of "SEIA shall be provided", the SEIA management plan to be shared during any stakeholders consultation session would suffice and more practical. We must not create bureaucracy by distributing the SEIA or management plan. Let UoC decide the channel to cascade the information.

#	Indicator	Comment (English)
225	3.4.4	<p>"Suggest to take off this indicator as it should be managed through the management and monitoring plan as opposed to reviewing the entire SEIA.</p> <p>[>Having SEIA conducted, reviewed every two years is not practical. SEIA is a legal requirement in many countries and companies must follow regulations to implement it. SEIA is done prior to a project (not at a time when a project is already in operation) and during the implementation of the project, the management and monitoring plan is reviewed periodically (in Ghana every 3 years, in Nigeria every 5 years) as we already have in the standard (3.4.3C). Therefore any new risk identified, will be addressed by the management and monitoring plan. The 2-year review of SEIA would not be consistent with the legal requirements in these countries.</p> <p>> In Malaysia, there is no legal requirement to review and revise EIA. as it is managed through the management plan. Company will update the EIA only for specific requirements for e.g. when there is a new planting or replanting [more than 500 hectares for Sabah and Sarawak], , or the case of displacement of a community of more than 100 people. The monitoring plan of the EIA requires regular review]."</p>
226	3.4.4	This review will be carried out with the participation of relevant external stakeholders.
227	3.4.4	Suggest to do NPP SEIA review whenever necessary instead of once every two years.
228	3.4.4	This review will be carried out with the participation of relevant external stakeholders.
229	3.4.4	<p>"Proposed indicator 3.4.4</p> <p>- Disagreeing to review documents seia is carried out every 2 years but adjusted if there is a change in the capacity of activities, the area of activity or additional activities of the certification unit or changes in the SEA studies scope that can potentially on environmental impacts and in accordance with applicable national regulations."</p>
230	3.4.4	<p>"Proposed Indicator 3.4.4: 1. Disagreeing EIA Document Review (AMDAL) is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc.</p> <p>2. Use the sentence: ""Seia will be reviewed if there is a change in capacity, activity, scope that has an impact on the environment in accordance with national regulations""</p> <p>"</p>
231	3.4.4	<p>"Indicator 3.4.4:</p> <p>- Disagree if the EIA document review (AMDAL) is carried out every 2 years, it should be adjusted if there is a change in capacity, activity, scope, etc.</p> <p>- Proposed sentence revision: ""Seia will be reviewed if there is a change in capacity, activity, scope that has an impact on the environment in accordance with national regulations"""</p>

#	Indicator	Comment (English)
232	3.4.4	"- Disagrees to the EIA document review (AMDAL) is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc. - Use the sentence: ""Seia will be reviewed if there is a change in capacity, activity, scope that has an impact on the environment in accordance with national regulations"" "
233	3.4.4	"Indicator 3.4.4: The English version, namely: ""Provided"" should be interpreted in Indonesian which is ""available"". Consideration: This is to be consistent with indicators 1.1.1 Indicator 3.4.4: It is necessary to clarify that the product identification of environmental and social impacts required based on laws and regulations is not included in the review requirements per 2 years because it already has its own review mechanism (cth: for Indonesia is RKL-RPL). It also needs an explanation regarding the basis for determining the 2 years of the review period because actually the review is more effective if there are changes related to field operations that are likely to have an impact on the environment and social."
234	3.4.4	Proposed changes in indicators 3.4.4: - It is necessary to change the phrase "Review of the EIA document (AMDAL) is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc." - Use the sentence: "Seia will be reviewed if there is a change in capacity, activity , scope that has an impact on the environment in accordance with national regulations "
235	3.4.4	"Proposal: - Disagree with the EIA document review (AMDAL) is carried out every 2 years, adjusted to if there is a change in capacity, activity, scope, - Use the sentence: ""Seia will be reviewed if there is a change in capacity, activity, scope that has an impact on the environment in accordance with national regulations"""
236	3.4.4	"Proposed Indicator 3.4.4: - Disagrees to the EIA document review (AMDAL) is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc. - Use the sentence: ""Seia will be reviewed if there is a change in capacity, activity, scope that has an impact on the environment in accordance with national regulations"""
237	3.4.4	"Indicator 3.4.4 is proposed to: 1. Disagree with the EIA document review (AMDAL) is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc. 2. Use the sentence: ""Seia will be reviewed if there is a change in capacity, activity, scope that has an impact on the environment in accordance with national regulations."""

#	Indicator	Comment (English)
238	3.4.4	"Proposed 3.4.4: - Disagrees to the EIA document review (AMDAL) is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc. - Use the sentence: ""Seia will be reviewed if there is a change in capacity, activity, scope that has an impact on the environment in accordance with national regulations"" "
239	3.4.4	"3.4.4 -Disagrees to the EIA document review (AMDAL) is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc. -> Proposed Sentence: ""Seia will be reviewed if there is a change in capacity, activity, scope that has an impact to the environment in accordance with national regulations "" "
240	3.4.4	3.4.4: The phrase "every two (2) years" is changed to "if there is a change in capacity, activity, scope that has an impact on the environment in accordance with applicable national regulations". Explanation: Review of Documents Seia or AMDAL in Indonesia is regulated by national regulations. The SIA document can be reviewed every 2 years according to the previous RSPO P&C provisions.
241	3.4.4	Comment: - There is no basis/reference that regulates the review provisions carried out every 2 years - Disagreeing EIA Document Review (AMDAL) is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc. Proposed changes: 3.4.4 Seia must Reviewed if there is a change in capacity, activity, scope that has an impact on the environment in accordance with national regulations. Seia must be done on all people affected in the form and language understood by all parties.
242	3.4.4	"Indicator 3.4.4 Proposed: - Disagrees to the SEA (AMDAL) document review is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc. - Use the sentence: ""Seia will be reviewed if there is a change in capacity, activity, scope that has an impact on the environment in accordance with national regulations"""
243	3.4.4	"3.4.4: The sentence ""every two (2) years"" is changed to ""if there are changes in capacity, activity, scope impact on the environment in accordance with national regulations applicable"". Explanation: SEA Document Review or AMDAL in Indonesia is regulated by national regulations. SIA documents in addition can be reviewed Every 2 years according to the previous RSPO P&C provisions. "

#	Indicator	Comment (English)
244	3.4.4	3.4.4- Disagree with the EIA document review (AMDAL) is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc. - Use the sentence: "Seia will be reviewed if there is a change in capacity, activity, scope that affects the environment accordingly National Regulation
245	3.4.4	"Comment: - There is no basis/reference governing the review provisions are carried out every 2 years - Disagrees to the EIA document review (AMDAL) is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc. Proposed changes: 3.4.4 Seia must be reviewed if there is a change in capacity, activity, scope that has an impact on the environment in accordance with national regulations. Seia must be done on all people affected in the form and language understood by all parties. "
246	3.4.4	"Proposed Indicator 3.4.4: - Disagrees to the EIA document review (AMDAL) is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc. - Use the sentence: ""Seia will be reviewed if there is a change in capacity, activity, scope that has an impact on the environment in accordance with national regulations"" "
247	3.4.4	[Jakarta WS] 3.4.4 review done every three years not two years - as it is regulated under law. Also remove 'including vulnerable and illiterate groups.' it is covered under all parties - because it will create audit issues - where to find them and make sure to find them and interview them.
248	3.4.4	"In indicators 3.4.4 - Disagrees to the EIA document review (AMDAL) is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc. - Use the sentence: ""Seia will be reviewed if there is a change in capacity, activity, scope that has an impact on the environment in accordance with national regulations"""
249	3.4.4	Proposed changing sentences to: "Seia will be reviewed if there are changes in capacity, activity, scopes that have an impact on the environment in accordance with the applicable national regulations"
250	3.4.4	"Disagreeing EIA Document Review (AMDAL) is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc. Proposed change: ""Seia will be reviewed if there is a change in capacity, activity, scope that has an impact on the environment in accordance with national regulations"""

#	Indicator	Comment (English)
251	3.4.4	"3.4.4: - Disagree with the EIA document review (AMDAL) is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc. - Use the sentence: ""Seia will be reviewed if there is a change in capacity, activity, scope that has an impact on the environment in accordance with national regulations"""
252	3.4.4	Indicator 3.4.4 Proposed in order to: 1. Disagree to the EIA document review (AMDAL) is carried out every 2 years, adjusted if there is a change in capacity, activity, scope, etc. 2. Use the sentence: "Seia will be reviewed if there is a change in capacity, activity, Scope which has an impact on the environment in accordance with national regulations. "
253	3.4.4	Keep in mind that the Spanish translation of the affected term, in Spanish has a negative connotation, we suggest using the impact (positive or negative) because it diverts the term used and in the principle 4 that in some cases is spoken of affected as affected as Negative is not coincident.
254	3.4.4	Keep in mind that the Spanish translation of the affected term, in Spanish has a negative connotation, we suggest using the impact (positive or negative) because it diverts the term used and in the principle 4 that in some cases is spoken of affected as affected as Negative is not coincident.
255	3.4.4	It makes no sense to review the EISA every two years unless there is a new operation or new planting, it is suggested to include that EISA will be reviewed (new planting and/or new operation)
256	3.4.4	It is suggested to include that EISA will be reviewed when it is carried out: (new planting and/or new operation) and the management plans will be reviewed and/or updated every (2) two years.
257	3.4.4	"I suggest: 3.4.4 The EISA action plans will be checked every two (2) years. In the event that there are changes in the findings of the EISA, it will be updated to have the new impacts on their interested parties."
258	3.4.4	[Abidjan WS] 3.4.4 propose to merge under 3.4.3 as proposed above.
259	3.5	"We need to ensure that smallholders have access to information, particularly on good agricultural practices and on which molecules to use or avoid, to ensure that procedures are properly followed."

#	Indicator	Comment (English)
260	3.5	<p>"Regenerative Agriculture - Comments</p> <p>>Reg Ag is a means to deliver on various elements of the RSPO standard (e.g. water quality, safe use of pesticides and herbicides, GHG etc.) - No need to write it in a separate element in the standard. But it would probably be useful to mention it in any supporting guidance.</p> <p>The RSPO standard could recognize the adoption of certain Reg.Ag. practices, in certain contexts as indicators of good practice, for e.g. integration of grazing livestock within palm plantations, where this is an economically viable option, to reduce or avoid use of herbicides and promote nutrient cycling to reduce dependency on inorganic N fertilizer.</p> <p>>Suggest RSPO to widen the 'RSPO best practices on agricultural practices' to all types of palm oil plantations.</p> <p>>Some of the Reg Ag principles i.e. good agricultural practices are embedded in the standards (P&C and ISH), suggest RSPO to do an internal study/a gap analysis of Reg. Ag. practices principles against RSPO standards and determine what are the additional > alignment "</p>
261	3.5	We need to ensure that smallholders have access to information, particularly on good agricultural practices and on which molecules to use or avoid, to ensure that procedures are properly followed.
262	3.5	We need to ensure that smallholders have access to information, particularly on good agricultural practices and on which molecules to use or avoid, to ensure that procedures are properly followed.
263	3.5	We need to ensure that smallholders have access to information, particularly on good agricultural practices and on which molecules to use or avoid, to ensure that procedures are properly followed.
264	3.5	<p>"3.5 Note section to be deleted because:</p> <ul style="list-style-type: none"> • Indonesia has many regulations according to its level (Law to Ministerial Regulation). National interpretation will have difficulty identifying it. • There are different regional regulations according to each location • The dynamics of laws and regulations in Indonesia are very high (especially the addition of legislation) • All certification units have identified related laws and requirements in their respective locations • Important environmental and social impacts will be identified during the assessment process so that it does not need to be determined by the national interpretation <p>"</p>
265	3.5.1	3.5.1 This is an indicator based on ignorance as any functional estate or unit of certification undertakes this exercise annually. The indicator is also not time specific.
266	3.5.1	"3.5.1 + 3.5.2 This estimate must be carried out with external experts, in collaboration with all stakeholders - potentially including the use of satellite tools and/or field photos to attest land use and tree maturity/health. This is to avoid any drifting of the system in place."
267	3.5.1	also for indirectly sourced FFB?

#	Indicator	Comment (English)
268	3.5.1	This estimate must be carried out with external experts, in collaboration with all stakeholders - potentially including the use of satellite tools and/or field photos to attest land use and tree maturity/health. This is to avoid any drifting of the system in place.
269	3.5.1	3.5.1 + 3.5.2 This estimate must be carried out with external experts, in collaboration with all stakeholders - potentially including the use of satellite tools and/or field photos to attest land use and tree maturity/health. This is to avoid any drifting of the system in place.
270	3.5.1	This estimate must be carried out with external experts, in collaboration with all stakeholders - potentially including the use of satellite tools and/or field photos to attest land use and tree maturity/health. This is to avoid any drifting of the system in place.
271	3.5.1	Suggest to add "optimum while sustainable FFB yield"
272	3.5.1	3.5.1: The word "potential" is removed because there is already a word "estimating"
273	3.5.1	the word potential is removed because there is a repetition of words (estimates and potential of the same meaning)
274	3.5.1	[Jakarta WS] 3.5.1 proposed to reword to 'The Unit of Certification shall document annual projected yield potential of its own plantation (excluding direct and indirect FFB supplier)'. This is avoid mis-interpretation where CB raise NC when actual yield is lower then projected.
275	3.5.1	Indicator 3.5.1 is proposed in order to: The word "potential" is removed because there is a repetition of words (estimates and the same meaning).
276	3.5.1	"Proposed Indicator 3.5.1: the word potential is removed because there is a repetition of words (estimates and potential of the same meaning)"
277	3.5.1	"Proposed Indicator 3.5.1: The word potential is removed because there is a repetition of words (estimates and the same meaning)."
278	3.5.1	"Comment: The word potential is removed because there is a repetition of words (estimates and potential of the same meaning) Proposed changes: 3.5.1 Certification Unit must estimate the potential of the Fresh Fruit Bunches (FFB) harvest to optimize the crop of FFB."
279	3.5.1	abolish the phrase "potential" - already estimated
280	3.5.1	Proposal 3.5.1: Potential words are removed due to repetition of words (estimates and potential of the same meaning)
281	3.5.1	In indicators 3.5.1 Potential words are removed due to repetition of words (estimates and potential of the same meaning)
282	3.5.1	3.5.1 Please detail the projection of TBS potential for how many years the data needs to be provided?
283	3.5.1	"3.5.1: The word ""potential"" is removed because there is already a word ""Estimating"""
284	3.5.1	"Proposed 3.5.1: The word potential is removed because there is a repetition of words (estimates and potential of the same meaning)"
285	3.5.1	3.5.1 - Potential words are removed due to repetition of words ("estimates" and "potential" has the same meaning)

#	Indicator	Comment (English)
286	3.5.1	Indicator 3.5.1 is proposed in order to: The word "potential" is removed because there is a repetition of words (estimates and the same meaning).
287	3.5.1	Proposal: Potential words are removed due to repetition of words (estimates and potential of the same meaning)
288	3.5.1	Indicator 3.5.1 is proposed in order to: The word "potential" is removed because there is a repetition of words (estimates and the same meaning).
289	3.5.1	Indicator 3.5.1 Proposed: Potential words are removed due to repetition of words (estimates and potentials are equal)
290	3.5.1	Important specify the performance of performance, either by production or productivity in production/hectares.
291	3.5.1	"Include performance scope, either production /hectares or production /t rff"
292	3.5.1	In the annexes of the standard, some suggested methodologies could be included for the estimation of the RFFs that allow facilitating the auditability of the new indicator.
293	3.5.2	3.5.2 This is such a wide topic for a specific indicator. Proper consultation is required and reframing is necessary.
294	3.5.2	"Proposed Indicator 3.5.2: The sentence is changed to: ""There is a record of parking implementation - good cultivation practices as stipulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment"""
295	3.5.3	Indicator 3.5.3 should precede 3.5.2. Please flip it.
296	3.5.3	"Guidelines to be published to certify what is and what is not good farming practice With a basic guide, available in all relevant languages, and effective local relays, to ensure messages are disseminated and understood."
297	3.5.3	"Guidelines to be published to certify what is and what is not good farming practice With a basic guide, available in all relevant languages, and effective local relays, to ensure messages are disseminated and understood."
298	3.5.3	"Proposed 3.5.3: The sentence is changed to: ""There is a record of parking implementation - good cultivation practices as stipulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment"""
299	3.5.3	Comment: Language Indicator is unclear and difficult to understand proposed changes: 3.5.3 Available recording of parking implementation - good cultivation practices as stipulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment
300	3.5.3	Proposed 3.5.3: Improvement of sentence indicators to: "A recorded PARKTIC Implementation Records - Good Aquaculture Practices As stipulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment"
301	3.5.3	Proposed changes in Indkator 3.5.3 to be available recording of parking implementation - good cultivation practices as stipulated in SOPs to manage soil fertility so that the harvest is optimal and has a minimum impact on the environment

#	Indicator	Comment (English)
302	3.5.3	"Comment: Indicator language is unclear and difficult to understand Proposed changes: 3.5.3 Records of Parktic Implementation Available - good cultivation practices as stipulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment"
303	3.5.3	"Proposed 3.5.3: Improvement of sentence indicators to: ""Available Records of Parktic Implementation - Good Cultivation Practices as stipulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment"""
304	3.5.3	"Indicator 3.5.3 Proposed In order to: Sentences are changed to ""Records of the implementation of good cultivation practices as regulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment."" "
305	3.5.3	"3.5.3. - The sentence is changed to: ""Available recording of parking implementation - good cultivation practices as stipulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment"" "
306	3.5.3	Language Indicator is difficult to understand, so that the language proposal is as follows: 3.5.3 Records are available in parking implementation - good cultivation practices as stipulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment
307	3.5.3	3.5.3. The sentence is changed to: "There is a record of parking implementation - good cultivation practices as stipulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment"
308	3.5.3	"Proposed Indicator 3.5.3: The sentence is changed to: ""There is a record of parking implementation - good cultivation practices as stipulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment"" "
309	3.5.3	"Proposal: The sentence is changed to: ""There is a record of parking implementation - good cultivation practices as stipulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment"" "
310	3.5.3	The sentence is changed to: "There is a record of parking implementation - good cultivation practices as stipulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment"
311	3.5.3	Indicator 3.5.3 Sentences are changed to: "PARKTIC IMPLEMENTATION RECORDING - Good Cultivation Practices As stipulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment"

#	Indicator	Comment (English)
312	3.5.3	The sentence is changed to: "There is a record of parking implementation - good cultivation practices as stipulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment"
313	3.5.3	"Indicator 3.5.3 Proposed: The sentence is changed to: ""There is a record of parking implementation - good cultivation practices as stipulated in SOPs to manage soil fertility so that the yields are optimal and have a minimum impact on the environment"" "
314	3.6	A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process
315	3.6	"3.6 provide operational assistance to mills to implement these requirements: tools, training, support... A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process"
316	3.6	"3.6 provide operational assistance to mills to implement these requirements: tools, training, support... A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process"
317	3.6	"provide operational assistance to mills to implement these requirements: tools, training, support... A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process"
318	3.6	""3.6 provide operational assistance to mills to implement these requirements: tools, training, support... A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process""

#	Indicator	Comment (English)
319	3.6	<p>"provide operational assistance to mills to implement these requirements: tools, training, support... A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process"</p>
320	3.6	<p>"provide operational assistance to mills to implement these requirements: tools, training, support... A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process"</p>
321	3.6	<p>"provide operational assistance to mills to implement these requirements: tools, training, support... A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process"</p>
322	3.6	<p>"3.6 provide operational assistance to mills to implement these requirements: tools, training, support... A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process"</p>
323	3.6	<p>"3.6 provide operational assistance to mills to implement these requirements: tools, training, support... A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator</p> <p>A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process"</p>

#	Indicator	Comment (English)
324	3.6	"provide operational assistance to mills to implement these requirements: tools, training, support... A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator"
325	3.6	"3.6 provide operational assistance to mills to implement these requirements: tools, training, support... A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator A timeline should be specified for the establishment of the taskforce and the development of a solution and audit process"
326	3.6	"3.6 provide operational assistance to mills to implement these requirements: tools, training, support... A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator"
327	3.6.1	3.6.1 This is a mouthful indicator. Again, another badly written indicator. RSPO should get a language expert to reframe the indicator in this standard.
328	3.6.1	online platform or secure system to make this information available
329	3.6.1	Support is definitely needed from the RSPO and the market as a whole to help mills implement this tracking system. The MB model is still very unclear to most non-certified FFB suppliers. We need to help mills get organized and raise smallholders' awareness of the need to trace their harvests too.
330	3.6.1	Support is definitely needed from the RSPO and the market as a whole to help mills implement this tracking system. The MB model is still very unclear to most non-certified FFB suppliers. We need to help mills get organized and raise smallholders' awareness of the need to trace their harvests too.
331	3.6.1	Support is definitely needed from the RSPO and the market as a whole to help mills implement this tracking system. The MB model is still very unclear to most non-certified FFB suppliers. We need to help mills get organized and raise smallholders' awareness of the need to trace their harvests too.
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#	Indicator	Comment (English)
333	3.6.1	Support is definitely needed from the RSPO and the market as a whole to help mills implement this tracking system. The MB model is still very unclear to most non-certified FFB suppliers. We need to help mills get organized and raise smallholders' awareness of the need to trace their harvests too.
334	3.6.1	Support is definitely needed from the RSPO and the market as a whole to help mills implement this tracking system. The MB model is still very unclear to most non-certified FFB suppliers. We need to help mills get organized and raise smallholders' awareness of the need to trace their harvests too.
335	3.6.1	Support is definitely needed from the RSPO and the market as a whole to help mills implement this tracking system. The MB model is still very unclear to most non-certified FFB suppliers. We need to help mills get organized and raise smallholders' awareness of the need to trace their harvests too.
336	3.6.1	[Abidjan WS] 3.6.1 and 3.6.2 - annual production - proposed change to production over the last 12 months. As they will be different understanding on annual - calendar year or fiscal year etc.
337	3.6.2	3.6.2 Again, please reframe this indicator as the language is long-winded.
338	3.6.2	online platform or secure system to make this information available.
339	3.6.2	online platform or secure system to make this information available
340	3.6.2	"online platform or secure system to make this information available"
341	3.6.2	online platform or secure system to make this information available
342	3.6.2	""Guidelines to be published to certify what is and what is not good farming practice With a basic guide, available in all relevant languages, and effective local relays, to ensure messages are disseminated and understood.""
343	3.6.2	"online platform or secure system to make this information available"
344	3.6.3	3.6.3 All indicators retained from the previous P&Cs seem to be well-structured. RSPO might need to reconsider a language consultant for this P&C
345	3.6.3	"3.6.3 d). Contamination? Please define. Does this mean contamination with mineral oils? If it means contamination of IP products with MB and no-certified, then this is covered later. It seems to be a useless comment as any mill will soon have its product rejected if the oil or PK is contaminated! The clarification line so there to clean the mucky oil that comes out of the presses!"
346	3.6.4	3.6.4 In the RSPO SCC standard, the person conducting the annual internal audit cannot be the person in charge as the audit must be independent. Why not here?
347	3.6.4	[Accra WS] 3.6.4 - to include the scope of the internal audit to cover for 'any other outsourcing activities'
348	3.6.4	[Accra WS] 3.6.4 RSPO to provide guidance on internal audit procedure? What are the critical elements?

#	Indicator	Comment (English)
349	3.6.5	<p>"When certified independent smallholders (ISH) chose to sell their certified volume via Credits, suggest to give exemption for the mill to maintain status as Identity Preserved (IP) when they process these FFBs physically (certified volume has become uncertified volume after ISH traded in PalmTrace).</p> <p>This is to encourage a certified mill to continue receiving FFBs from certified ISH who sells their volume via Credits."</p>
350	3.6.5	<p>"The data mills collect on purchasing in 3.6.5 (traded volumes both certified and non-certified) needs to be linked with the data gathered in 2.3.</p> <p>[3.6.5 Purchasing and Goods in RSPO MB study undertaken by Proforest highlighted the link between 2.3 and 3.6.5 regarding the legality of source/supplier and volumes. Mills are required to verify and document the tonnage and sources of certified and the tonnage of non-certified FFB received (P&C 3.6.5 i). For non-certified FFB, mills are not required to verify and document the sources, only the tonnage. It also does not specify the types of information to keep for the purchasing (e.g. supplier's origin/location, proof of legality). So even though P&C 2.3 requires non-certified FFB to be from legal supplier [provision of geolocation, ownership, license to operate] the standard does not ask explicitly to link this information through to the volumes in/out as stipulated under 3.6.5]."</p>
351	3.6.5	<p>[Abidjan WS] 3.6.5 iii) Provide definition and/or guidance on what are nonconforming FFB - example the FFB delivered by using a dirty truck - is it not conforming?</p>
352	3.6.6	<p>"Support is definitely needed from the RSPO and the market as a whole to help mills implement this tracking system. The MB model is still very unclear to most non-certified FFB suppliers. We need to help mills get organized and raise smallholders' awareness of the need to trace their harvests too."</p>
353	3.6.6	<p>Support is definitely needed from the RSPO and the market as a whole to help mills implement this tracking system. The MB model is still very unclear to most non-certified FFB suppliers. We need to help mills get organized and raise smallholders' awareness of the need to trace their harvests too.</p>
354	3.6.6	<p>including geo info and land ownership info? Could be relevant to expand information system for those members needing to show evidence and information for due diligence</p>
355	3.6.6	<p>Support is definitely needed from the RSPO and the market as a whole to help mills implement this tracking system. The MB model is still very unclear to most non-certified FFB suppliers. We need to help mills get organized and raise smallholders' awareness of the need to trace their harvests too.</p>
356	3.6.6	<p>"3.6 provide operational assistance to mills to implement these requirements: tools, training, support... A Task Force is to be established to propose a solution that can be audited and would require growers to gradually progress towards full implementation of this indicator"</p>

#	Indicator	Comment (English)
357	3.6.6	Support is definitely needed from the RSPO and the market as a whole to help mills implement this tracking system. The MB model is still very unclear to most non-certified FFB suppliers. We need to help mills get organized and raise smallholders' awareness of the need to trace their harvests too.
358	3.6.6	"Support is definitely needed from the RSPO and the market as a whole to help mills implement this tracking system. The MB model is still very unclear to most non-certified FFB suppliers. We need to help mills get organized and raise smallholders' awareness of the need to trace their harvests too."
359	3.6.7	"Support is definitely needed from the RSPO and the market as a whole to help mills implement this tracking system. The MB model is still very unclear to most non-certified FFB suppliers. We need to help mills get organized and raise smallholders' awareness of the need to trace their harvests too."
360	3.6.7	[Accra WS] this indicator should be elevated to critical indicator
361	3.6.7	"Support is definitely needed from the RSPO and the market as a whole to help mills implement this tracking system. The MB model is still very unclear to most non-certified FFB suppliers. We need to help mills get organized and raise smallholders' awareness of the need to trace their harvests too."
362	3.6.7	Support is definitely needed from the RSPO and the market as a whole to help mills implement this tracking system. The MB model is still very unclear to most non-certified FFB suppliers. We need to help mills get organized and raise smallholders' awareness of the need to trace their harvests too.
363	3.6.7	Support is definitely needed from the RSPO and the market as a whole to help mills implement this tracking system. The MB model is still very unclear to most non-certified FFB suppliers. We need to help mills get organized and raise smallholders' awareness of the need to trace their harvests too.
364	3.6.7	Proposed improvement for indicators 3.6.7: Translation to "PKS may not convert its factory activities".
365	3.6.7	"The proposed translation improvement to ""PKS may not convert to its factory activities""."
366	3.6.7	Proposed improvement for indicators 3.6.7: Translation to "PKS may not convert its factory activities".
367	3.6.7	The proposed translation improvement to "PKS may not convert to its factory activities".
368	3.6.7	"Proposed Indicator 3.6.7: The proposed translation improvement to ""PKS may not convert to its factory activities""." "
369	3.6.7	"Proposed improvement for point 3.6.7: The translation to ""PKS may not convert its factory activities""." "
370	3.6.7	Indicator 3.6.7 Proposed translation improvement to "PKS may not convert its factory activities".
371	3.6.7	3.6.7 - Proposed translation improvement to "PKS may not switch to its factory activities".

#	Indicator	Comment (English)
372	3.6.7	Proposed Indicator 3.6.7: Improvement of the translation to "PKS may not convert to its factory activities".
373	3.6.7	Indicator 3.6.7 is proposed in order to: Point (i) the translation to "PKS may not convert to its factory activities".
374	3.6.7	"Proposed Indicator 3.6.7: The proposed translation improvement to ""PKS may not convert to its factory activities"". "
375	3.6.7	"Indicator 3.6.7 Proposed: The proposed translation improvement to ""PKS may not convert to its factory activities""."
376	3.6.9	"Let us be very, very clear: If any mill receives and processes ANY quantity of non-certified FFB or FFB with an MB claim, then it is deemed to be a Mass Balance Mill. See also comments for 3.6.9 C and 3.6.10. There is NO way that a mill can produce 100% separated IP through a clarification line if they have processed any non-certified crop, without stripping the complete line and steam cleaning every single pipe, valve, machine and tank. "
377	3.6.9	"3.6.9 c). The credibility of the mass balance supply chain model is in serious doubt as it is effectively the ISO definition of book and claim. There is no guarantee of even one molecule of certified CPO and PKO in any product that carries an MB claim and an MB claim can be created throughout the supply chain on products from TOTALLY UN-KNOWN ORIGINS! (An MB claim can even be created on Glycerine derived from cocoa nut oil, olive oil etc.,!!). Allowing selling short further undermines the credibility of the RSPO and must NOT be allowed. MB must ONLY be claimed from positive physical and matching paper MB stock records and so the MB account must ALWAYS be equal to or greater than the physical stock. It must NEVER be allowed that the paper record for MB ever exceeds any physical stock. It is almost 100% certain that the SCC review will ensure that the MB supply chain model reflects the true ISO definition of MB and does not continue as nothing more and nothing less than Book and Claim. The RSPO book and claim supply chain model is quite simply the trading of credits! "
378	3.6.9	[Accra WS] 3.6.9 iv b) add '...according to mill-specific conversion ratios. In the absence of mill-specific conversion ratios, material account system shall be in accordance with RSPO guidance on conversion ratios.'
379	3.6.9	[Accra WS] 3.6.9 iv a) 'three-monthly basis'?
380	3.6.9	"3.6.9 Points IV a. Writing mistake. (1) It says ""Thrice-Monthly"" should be ""Three-Monthly"". (2) In the Indonesian version the word balance is interpreted to ""calculate"" should ""balance"""

#	Indicator	Comment (English)
381	3.6.10	<p>"Identity Preserved must mean just that. IP claim must ONLY be applicable to a mill that is processing 100% RSPO certified FFB. The standard requires 100% separation. This means that the certified FFB must be kept separate from non-certified (and MB FFB - that may result from an FFB trader or collector mixing certified FFB with non-certified FFB and then selling non-certified FFB with an MB claim!!).</p> <p>Through the nature of the sterilizers, threshers, digesters and presses, and their effectively self cleaning, it is possible to batch process certified FFB and then non certified FFB and still claim IP and 100% separation at that point.</p> <p>However, the clarification line comprises significant lengths of small diameter pipes, machines with very large surface areas compared to the volume of oil (Centrifuges, Filters, vibrating screens etc.,) as well as small and intermediate storage tanks, that without actual stripping the mill to pieces and steam cleaning every element of the clarification line that it is possible to claim 100% separation. ""Striving for 100% separation"" without a clear definition of what is meant by this, has already resulted in subjective auditing and decisions made by auditors that may conflict with the ASI auditors. The RSPO MUST encourage all growers to become RSPO P&C certified and stop allowing growers and mills to avoid full compliance. An IP claim on CPO and PK must ONLY be allowed if 100% of all FFB is from RSPO P&C or ISHS certified sources. The credibility of the RSPO is further under-mined if this is not the case,"</p>
382	3.6.10	To add on with a scenario : if the certified ISHS sell their volume via Credits, a mill will not be able to claim IP status (certified volume has become uncertified after traded in PalmTrace). In order to encourage a certified mill to continue receiving FFBS from certified ISHS who sell their volume via Credits, suggest to give exemption for the mill to maintain as IP status, with condition the CPO produced from that portion cannot be claimed as certified product in their bookkeeping.
383	3.6.11	Indicator 3.6.11 (c) proposed to be repaired and the sentence is changed to "the volume of the RSPO IT platform must be abolished, if: 1. Sold through other schemes or conventionally 2. lost or damaged volume.
384	3.6.11	Proposed Indicator 3.6.11: Changes in sentences to "the volume of the RSPO IT platform must be abolished if": 1. Sold through other schemes or by conventional means 2. Volume is lost or damaged
385	3.6.11	"Proposed 3.6.11 (c): The sentence is changed to ""the volume of the RSPO IT platform must be abolished if"": 1. For sale through other schemes or in a conventional way 2. The volume that is lost or damaged"
386	3.6.11	"Indicator 3.6.11 (c) Proposed for: The sentence is changed to ""the volume of the RSPO IT platform must be abolished, if: 1. For sale through other schemes or in a conventional way 2. lost or damaged volume."

#	Indicator	Comment (English)
387	3.6.11	"Indicator 3.6.11 The sentence is changed to ""the volume of the RSPO IT platform must be abolished if"": 1. For sale through other schemes or in a conventional way 2. The volume that is lost or damaged"
388	3.6.11	"3.6.11: The proposed sentence is changed to ""the volume of the RSPO IT platform must be abolished if"": 1. For sale through other schemes or in a conventional way 2. The volume that is lost or damaged"
389	3.6.11	3.6.11: The sentence proposal is changed to "the volume of the RSPO IT platform must be abolished if": 1. Sold through other schemes or by conventional means 2. Volume is lost or damaged
390	3.6.11	"Proposed Indicator 3.6.11: The sentence is changed to ""the volume of the RSPO IT platform must be abolished if"": 1. For sale through other schemes or in a conventional way 2. The volume that is lost or damaged"
391	3.6.11	"Proposal: The sentence is changed to ""the volume of the RSPO IT platform must be abolished if: 1.) For sale through other schemes or in a conventional way. 2.) Lost or damaged volume. """"
392	3.6.11	"Indicator 3.6.11 Proposed: The sentence is changed to ""the volume of the RSPO IT platform must be abolished if"": 1. For sale through other schemes or in a conventional way 2. The volume that is lost or damaged"
393	3.6.11	Indicator 3.6.11 (c) proposed to be repaired and the sentence is changed to "the volume of the RSPO IT platform must be abolished, if: 1. Sold through other schemes or conventionally 2. lost or damaged volume.
394	3.6.11	"Comment: The sentence is too long and unclear Proposed changes: (Indicator 3.6.11 Points (II) The volume of the RSPO IT platform must be abolished if: 1. For sale through other schemes or in a conventional way 2. The volume that is lost or damaged"

#	Indicator	Comment (English)
395	3.6.11	"Proposal: The sentence is changed to ""the volume of the RSPO IT platform must be abolished if"": 1. For sale through other schemes or in a conventional way 2. The volume that is lost or damaged"
396	3.6.11	"The sentence is changed to ""the volume of the RSPO IT platform must be abolished if"": 1. For sale through other schemes or in a conventional way 2. The volume that is lost or damaged"
397	3.6.12	This is fairly irrelevant to a mill as they are only producing IP or MB products when in compliance with this standard and making an IP or SG claim! The min 95% rule is not applicable and the only time the RSPO Trademark maybe used for General Corporate communication. Irrelevant requiriement.
398	3.6.12	From indicators 3.6.3 to 3.6.12, very minor changes have been introduced. This is either because the 2018 indicators are effective or the review of these indicators has been weak.

#	Indicator	Comment (English)
1	4	"Organisation of Principle 4: Please check the wording of 4.2 and 4.4 which are different cases. One should look at new planting/new development (FPIC guidance and support for implementation is available) and the other should look at existing plantations. [4.2 might be read as contradicting 4.4 which covers the case where plantation has not had an FPIC agreement in place when it was established. 4.2 is not clear and leads us to think that it applies to every case which is not true. We have to read up to 4.4. to find out there is the case of land conflict where there was not FPIC in place and thus should be resolved through a mutually agreed process]." "
2	4	remove "and" after "rights,..."
3	4.1	"On the contrary, in view of the environmental problems and, above all, the cases of social grievances, it is essential that any new use of land for oil basket plantations be regulated in order to respect the rights of local populations. Information should be disseminated in a culturally appropriate manner."
4	4.1	"On the contrary, in view of the environmental problems and, above all, the cases of social grievances, it is essential that any new use of land for oil basket plantations be regulated in order to respect the rights of local populations. Information should be disseminated in a culturally appropriate manner."
5	4.1	"On the contrary, in view of the environmental problems and, above all, the cases of social grievances, it is essential that any new use of land for oil basket plantations be regulated in order to respect the rights of local populations. Information should be disseminated in a culturally appropriate manner."
6	4.1	On the contrary, in view of the environmental problems and, above all, the cases of social grievances, it is essential that any new use of land for oil basket plantations be regulated in order to respect the rights of local populations.
7	4.1	On the contrary, in view of the environmental problems and, above all, the cases of social grievances, it is essential that any new use of land for oil basket plantations be regulated in order to respect the rights of local populations.
8	4.1	"On the contrary, in view of the environmental problems and, above all, the cases of social grievances, it is essential that any new use of land for oil basket plantations be regulated in order to respect the rights of local populations. Information should be disseminated in a culturally appropriate manner."
9	4.1	"On the contrary, in view of the environmental problems and, above all, the cases of social grievances, it is essential that any new use of land for oil basket plantations be regulated in order to respect the rights of local populations. Information should be disseminated in a culturally appropriate manner."

#	Indicator	Comment (English)
10	4.1	"On the contrary, in view of the environmental problems and, above all, the cases of social grievances, it is essential that any new use of land for oil basket plantations be regulated in order to respect the rights of local populations."
11	4.1	"On the contrary, in view of the environmental problems and, above all, the cases of social grievances, it is essential that any new use of land for oil basket plantations be regulated in order to respect the rights of local populations. Information should be disseminated in a culturally appropriate manner."
12	4.1	On the contrary, in view of the environmental problems and, above all, the cases of social grievances, it is essential that any new use of land for oil basket plantations be regulated in order to respect the rights of local populations.
13	4.1	"On the contrary, in view of the environmental problems and, above all, the cases of social grievances, it is essential that any new use of land for oil basket plantations be regulated in order to respect the rights of local populations."
14	4.1	"On the contrary, in view of the environmental problems and, above all, the cases of social grievances, it is essential that any new use of land for oil basket plantations be regulated in order to respect the rights of local populations. Information should be disseminated in a culturally appropriate manner."
15	4.1	Sentence 4.1 was changed to "land use for oil palm does not reduce legal rights, customary rights recognized by the government in accordance with applicable national law, or the rights of utilization owned by other parties, except by obtaining the KBDD." so that the intended customary rights are more class
16	4.1	4.1: Sentences Criteria added, "customary rights recognized by the government in accordance with the applicable national law" to "criteria 4.1 Land utilization for palm oil does not reduce legal rights, customary rights recognized by the government in accordance with applicable national law, or the rights of utilization owned by the party Others, except by obtaining KBDD.
17	4.1.1	Partnerships with local governments, businesses and smallholders must be set up to help customary owners complete and accelerate administrative procedures and recognize their right to own their land.
18	4.1.1	"[HRWG] Recommendation: A compensation process or procedure may be more appropriate for cases where Communities are found on existing plantations. Align this with the RaCP process for HCV. In the RaCP, there are different dates between 2005 and now. It establishes the consequences of a clearance (including compensation) based on when a clearance of a HCV area was conducted. We need to look at when FPIC was first introduced (i.e. after 2005) and determine the consequences based on when a clearing without FPIC happened. Retrospective application of FPIC may cause legal uncertainty and therefore access to compensation processes may be the best way forward. For compensation, the start date should not pre-date when FPIC was first introduced to RSPO i.e. from 2005."
19	4.1.1	4.1.1 Please define new planting and new development. Specify the difference between the two and in which context, FPIC is required.

#	Indicator	Comment (English)
20	4.1.1	What is new development - definition to be provided
21	4.1.1	Partnerships with local governments, businesses and smallholders must be set up to help customary owners complete and accelerate administrative procedures and recognize their right to own their land.
22	4.1.1	Partnerships with local governments, businesses and smallholders must be set up to help customary owners complete and accelerate administrative procedures and recognize their right to own their land.
23	4.1.1	"4.1.1 (C) - To add: ""c) Existing Operations."" There are existing operations without FPIC or incomplete FPICs that require compliance. "
24	4.1.1	Partnerships with local governments, businesses and smallholders must be set up to help customary owners complete and accelerate administrative procedures and recognize their right to own their land.
25	4.1.1	Partnerships with local governments, businesses and smallholders must be set up to help customary owners complete and accelerate administrative procedures and recognize their right to own their land.
26	4.1.1	no need to specify as all indicators apply
27	4.1.1	[Sandakan, 21 June 2023] New Development definition should be provided in the standard.
28	4.1.1	In indicators 4.1.1 for both Pont (a and b) it is proposed to be combined into "new planting including the development of supporting infrastructure"
29	4.1.1	Proposal 4.1.4: Point A and B are combined into "new planting including the development of supporting infrastructure"
30	4.1.1	Proposed indicator 4.1.1. Points A and B are combined into "new planting including the development of supporting infrastructure".
31	4.1.1	4.1.1: There is no definition of "new development" in the definition section. It is recommended that there is a definition of "new development".
32	4.1.1	"Indicator 4.1.1 Proposed changes: Merging points A and B becomes ""new planting including the development of supporting infrastructure"""
33	4.1.1	Indicator 4.1.1 (c) is proposed to: points A and B are combined into "new planting including the development of supporting infrastructure".
34	4.1.1	4.1.1. Points A and B are combined into "new planting including the development of supporting infrastructure".

#	Indicator	Comment (English)
35	4.1.1	Comments: - Points A and B are combined into "new planting including the development of supporting infrastructure" - Definition and Limitation of New Development There is no proposal for change: 4.1.1 (c) KBDD must be obtained from people who are legal rights, customary rights, and other utilization rights (including access to forest resources, food, water, roads/channels, etc.) directly affected by new planting including the development of supporting infrastructure. The KBDD process specified in the indicator 4.2.1-4.2.11 is valid.
36	4.1.1	"Comment: - Points A and B are combined into ""new planting including the development of supporting infrastructure"" - The definition and limitations of new development do not exist Proposed changes: 4.1.1 (c) KBDD must be obtained from legal rights, customary rights, and other utilization rights (including access to forest resources, food, water, roads/channels, etc.) directly affected by new planting including the development of supporting infrastructure . The KBDD process specified in the indicator 4.2.1-4.2.11 is valid."
37	4.1.1	Proposal 4.1.1 (c): points a and b are combined into "new planting including the development of supporting infrastructure"
38	4.1.1	Indicator 4.1.1 Proposed: points A and B are combined into "new planting including the development of supporting infrastructure"
39	4.1.1	Points A and B are combined into "New Planting including the Development of Supporting Infrastructure"
40	4.1.1	Deletion of subsection b. new developments and leave the application of the CLPI only for new plantations
41	4.1.1	"4.1.1 (c) Free consent, prior and will be obtained Informed (CLPI) of communities whose rights legal, customary or other rights of use (such as Access to forest resources, food, water, incidentally, etc.), they are directly impacted by: to. New plantations b. New developments"
42	4.1.1	"4.1.1 (c) The free, prior and informed consent (CLPI) of communities whose legal, customary and other user rights will be obtained, such as access to forest resources, food, water, passing through, etc., etc., etc. They are directly affected by: to. New plantations b. New developments c. The existing operations and the areas withdrawn from the production for being AVC management areas [accepted objection] A producer suggests eliminating 4.1.1 (c) C; and determine a borderline date for the application of the CLPI The CLPI processes established in indicators 4.2.1 to 4.2.11 will be applied."

#	Indicator	Comment (English)
43	4.1.1	Remove from subsection b. new developments and leave the application of the CLPI only for new plantations
44	4.1.1	Clarify if the clip applies to existing plantations.
45	4.1.1	Define in a better way for the standards which are new developments. The scope is not clear.
46	4.1.1	"Accept the objection: existing operations and the areas withdrawn from production for being AVC management areas [accepted objection] A producer suggests eliminating 4.1.1 (c) C; and determine a borderline date for the application of the CLPI"
47	4.1.1	Define the term "new developments", since this process should not include infrastructure developments or processes changes in already certified units.
48	4.1.1	4.1.1 (c) The free, prior and informed consent (CLPI) of communities whose legal, customary and other user rights will be obtained, such as access to forest resources, food, water, passing through, etc., etc., etc. They are directly affected by: a. New plantations b. New developments c. The existing operations and the areas withdrawn from the production for being AVC management areas [accepted objection] A producer suggests eliminating 4.1.1 (c) C; and determine a borderline date for the application of the CLPI will apply the CLPI processes established in indicators 4.2.1 to 4.2.11.
49	4.1.1	The 4.1.1 indicator is not clear when defining the scope.
50	4.1.1	"4.1.1. Eliminate subsection ""B"" that says new developments, since subsection ""A"" refers to new plantations. Or define what refers to new developments."
51	4.1.2	Partnerships with local governments, businesses and smallholders must be set up to help customary owners complete and accelerate administrative procedures and recognize their right to own their land.
52	4.1.2	Partnerships with local governments, businesses and smallholders must be set up to help customary owners complete and accelerate administrative procedures and recognize their right to own their land.
53	4.1.2	"Partnerships with local governments, businesses and smallholders must be set up to help customary owners complete and accelerate administrative procedures and recognize their right to own their lands."
54	4.1.2	Partnerships with local governments, businesses and smallholders must be set up to help customary owners complete and accelerate administrative procedures and recognize their right to own their land.
55	4.1.2	4.1.2 Specify if this indicator is referring to the RSPO-specific guidance.
56	4.1.2	Partnerships with local governments, businesses and smallholders must be set up to help customary owners complete and accelerate administrative procedures and recognize their right to own their land.
57	4.1.2	"Partnerships with local governments, businesses and smallholders must be set up to help customary owners complete and accelerate administrative procedures and recognize their right to own their land."
58	4.1.2	Partnerships with local governments, businesses and smallholders must be set up to help customary owners complete and accelerate administrative procedures and recognize their right to own their land.

#	Indicator	Comment (English)
59	4.1.3	4.1.3 This indicator needs to be reviewed under national interpretation as it does not apply to the major oil palm countries.
60	4.1.3	4.1.3 Specify the objective by which already certified plantations that were sown before 2005 must have a CLPI.
61	4.1.3	Clarifying the meaning and scope of the criteria taking into account that "as a result of recent expropriations for reasons of national interest" is not a clear concept.
62	4.1.3	"Clarifying the meaning and scope of the criteria taking into account that ""as a result of recent expropriations for reasons of national interest"" is not a clear concept. "
63	4.1.3	"4.1.3 (c) New land will not be acquired for plantations and extractor plants after November 15, 2018, As a result of expropriations, except in cases of small producers that benefit from agrarian reform or drug -fight programs. --- This point is not clear and it is not clear why it is retroactive (2005) ..."
64	4.1.3	Clarifying the meaning and scope of the criteria taking into account that "as a result of recent expropriations for reasons of national interest" is not a clear concept.
65	4.1.3	Clarify the meaning and scope of the criteria, since it is not understood
66	4.1.3	[Abidjan WS] 4.1.3(C) remove 'anti-' should just be programme antidrogue.
67	4.1.4	4.1.4 The recognition of voluntary isolation should be proven and legally accepted by the government.
68	4.1.4	In indicator 4.1.4 The sentence "Planting and/or New Development" is proposed to be replaced by "new planting including the development of supporting infrastructure"
69	4.1.4	"Proposal 4.1.4: The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure"" This is because it is in one unity of the process .."
70	4.1.4	Indicator 4.1.4 Proposal: the phrase "planting and/or new development" was changed to "new planting including the development of supporting infrastructure"

#	Indicator	Comment (English)
71	4.1.4	"Comment: - Using new planting sentences including the development of supporting infrastructure "" - The definition and limitations of new development do not exist Proposed changes: 4.1.4 (c) New land obtained for new planting including the development of supporting infrastructure is not on the land inhabited by people who areolated themselves voluntarily. "
72	4.1.4	The phrase "Planting and/or New Development" was changed to "new planting including the development of supporting infrastructure"
73	4.1.4	Indicator 4.1.4 (c) proposed to: The phrase "planting and/or new development" is changed to "new planting including the development of supporting infrastructure".
74	4.1.4	Proposed 4.1.4: The phrase "Planting and/or New Development" was changed to "New Planting Includes in the development of supporting infrastructure". This is because it is already in a unity of the process.
75	4.1.4	"Indicator 4.1.4: Changing the phrase ""Planting and/or New Development"" to ""New Planting including the Development of Supporting Infrastructure"""
76	4.1.4	4.1.4. The phrase "Planting and/or New Development" was changed to "new planting including the development of supporting infrastructure"
77	4.1.4	Indicator 4.1.4 (c) proposed to: The phrase "planting and/or new development" is changed to "new planting including the development of supporting infrastructure".
78	4.1.4	"Indicator 4.1.4 Proposed: The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure"""
79	4.1.4	4.1.4 Voluntary isolation must have a legal form to demonstrate,
80	4.1.4	"4.1.4 (c) The new land acquired for new Plantations and/or new developments will not be on land inhabited by communities in voluntary isolation, which have legitimacy to be. --- I think the clarification is necessary because otherwise in Latam it can be provided to ""legalize"" invasions (common practice of people outside the UDC)"
81	4.1.4	4.1.4 Voluntary isolation must be legitimately demonstrated, clarify within the indicate, for any invasion that plantations can have
82	4.1.4	Voluntary isolation must be legally recognized.

#	Indicator	Comment (English)
83	4.1.4	The legitimacy of the isolation should be demonstrated under some legal mechanism.
84	4.1.4	The legitimacy of the isolation should be demonstrated under some legal mechanism while it should be made clear that it applies only for indigenous communities, since in the definition of voluntary isolation it is open for other types of populations
85	4.1.4	4.1.4 Define what refers to "voluntary isolation" and or let it refer to indigenous peoples.
86	4.1.4	"It is suggested to add ""... inhabited by communities in legitimately recognized voluntary isolation."" The legitimacy of the isolation must be demonstrated under some legal mechanism that formally recognizes it."
87	4.1.4	Add or clarify: land inhabited by indigenous communities in voluntary isolation under some legal mechanism.
88	4.1.5	4.1.5 Establish the link between this general indicator and FPIC. Otherwise, it should be relocated to the NPP indicator. And there are instances where NPP is not required.
89	4.1.5	4.1.5. The proposal to be abolished because it has been included in the NPP procedure which has also been verified by the certification institution.
90	4.1.5	For new indicators 4.1.5 it is proposed to be eliminated because it has been included in the NPP procedure carried out by the verification of the Certification Institute (can potentially double audit)
91	4.1.5	The indicator proposal was abolished because it was included in the NPP procedure carried out by the verification of the Certification Institute (can potentially double audit)
92	4.1.5	"[I] 4.1.5 The indicator proposal was abolished because it was included in the NPP procedure carried out by the verification of the Certification Institute (can potentially double audit)"
93	4.1.5	"Proposal: Indicator 4.1.5 is abolished because it has been included in the NPP procedure which has also been carried out by RSPO auditors by the Certification Institute (can potentially double audit). In addition, NPP requirements have been included in each indiakator related to new planting procedures starting from SEIA, Land Legality, HCV, HCS, Social Survey etc.) Double Counting Audit."
94	4.1.5	Indicator 4.1.5 is proposed to: Eliminated because it has been included in the NPP procedure carried out by the verification of the Certification Institute (can potentially double audit).
95	4.1.5	"Indicator 4.1.5 Proposed: The indicator proposal was abolished because it was included in the NPP procedure carried out by the verification of the Certification Institute (can potentially double audit)"
96	4.1.5	4.1.5. The indicator is abolished because it is included in the NPP procedure carried out by the verification itself by the Certification Institute (can potentially double audit).

#	Indicator	Comment (English)
97	4.1.5	Indicator 4.1.5 is proposed to: Eliminated because it has been included in the NPP procedure carried out by the verification of the Certification Institute (can potentially double audit).
98	4.1.5	"Proposal: Delete indicators because it has been included in the NPP procedure carried out by the verification of the Certification Institute (can potentially double audit)"
99	4.1.5	Indicator 4.1.5 is proposed to: Eliminated because it has been included in the NPP procedure carried out by the verification of the Certification Institute (can potentially double audit).
100	4.1.5	"Indicator 4.1.5: The indicators are included in the NPP procedure carried out by the verification itself by the certification institution so that it is proposed to be deleted"
101	4.2	Revise wording of 4.2 to clarify that this is for new planting/new development [This is specific to 'new plantings' (old 4.5) and why it was taken out?]
102	4.2	Information should be disseminated in a culturally appropriate manner.
103	4.2	Information should be disseminated in a culturally appropriate manner.
104	4.2	The update in FPIC requirements is understood and welcome for future developments. However, it is unclear how this applies to past FPIC's. FPICs done in the past for development purposes may have followed the 2018 P&C, but due to the updates, may not completely comply to the 2023 P&C. Past FPICs cannot be redone, but an auditor may interpret that it must comply 100% to the 2023 P&C. It is unclear how the revised FPIC requirements apply to past FPICs.
105	4.2	"Information should be disseminated in a culturally appropriate manner."
106	4.2	[4.2] This criteria should only apply to new plantings as it is the case in the 2018 P&C.
107	4.2	Information should be disseminated in a culturally appropriate manner.
108	4.2	"suggest adding (IN UPPER CASE): ...and FPIC has not been obtained FROM THE RIGHT HOLDERS."
109	4.2	4.2 need to be given notes in indicators 4.2.2, 4.2.3 (c), 4.2.4 (c), 4.2.5, 4.2.6, 4.2.7, 4.2.8, 4.2.9, 4.2.10 that for the unit for the unit Certification or old plantations that have been operating long before the implementation of the RSPO FPIC Guide (ie 2015) has no record for decision making in the past that meets the FPIC rules
110	4.2	4.5 This criterion to be removed because it is included in the criteria 2.4 regarding handling complaints
111	4.2.1	4.2.1 The list of affected communities should be identified through the FPIC process and not the SEIA. As stated earlier, the SEIA is a watered-down approach. A separate SIA is required. Moreover, FPIC should be a standalone process and provides stronger identification of affected parties, and not be extracted from the SEIA

#	Indicator	Comment (English)
112	4.2.1	4.2.1 This indicator is missing the FPIC point. A mere list does not prove anything,
113	4.2.1	4.2.1 "Any proposed New Plantings and/or Development in existing operations" - new plantings do not necessarily have to be in existing operations. They could be in areas where new operations are being established. Rewording is required.
114	4.2.1	<p>"Reference to SEIA as the means to identify affected communities seems to be a mistake. Change for reference to Land Tenure and Use Study instead.</p> <p>As clearly stated in the RSPO FPIC Guide page 28 (assessment stage), identification of affected communities should be done through a Land Tenure and Use Study :</p> <p>The fundamental purpose of this stage is to:</p> <ul style="list-style-type: none"> • Identify land ownership, boundaries and use (Land tenure and use assessment and participatory mapping) • Assess impacts of the potential development (SEIA) • Identify areas of conservation and forests (HCV assessment, HCS assessment, integrated HCV-HCSA assessment)"
115	4.2.1	Sustained objection: Identification of affected parties have been covered under Principle 3 (SEIA). FPIC shall be confined to new plantings/new developments only as per 4.1.1. SEIA would suffice if there is any conflicts/grievance from affected parties. This entire principles are in a mess after revamp. All in all, remain FPIC concept in P&C 2018 and revert back to the original text for P4 in P&C 2018.
116	4.2.1	<p>"Proposal:</p> <ul style="list-style-type: none"> - Specifying SEA documents (including the list of affected communities) available and cover the entire area - The phrase ""Planting and/or New Development"" was changed to ""New Planting including the Development of Supporting Infrastructure""
117	4.2.1	"Proposed 4.2.1: The sentence ""planting and/or new development"" was changed to ""new planting including the development of supporting infrastructure""
118	4.2.1	Proposed sentence changes in indicators 4.2.1. Changing the phrase "Planting and/or New Development" to "New Planting including the development of supporting infrastructure".
119	4.2.1	Changing the phrase "Planting and/or New Development" to "New Planting including the Development of Supporting Infrastructure"
120	4.2.1	4.2.1. Changing the phrase "Planting and/or New Development" to "New Planting including the development of supporting infrastructure".
121	4.2.1	Indicator 4.2.1 is proposed to: The phrase "planting and/or new development" is changed to "new planting including the development of supporting infrastructure".

#	Indicator	Comment (English)
122	4.2.1	Indicator 4.2.1 is proposed to: The phrase "planting and/or new development" is changed to "new planting including the development of supporting infrastructure".
123	4.2.1	"Comment: - Using new planting sentences including the development of supporting infrastructure "" - The definition and limitations of new development do not exist Proposed changes: 4.2.1 (c) Identifying the list of affected communities in the area of the proposed new planting including the development of supporting infrastructure in the operation that is being carried out, through the SEIA or a review of the management plan and utilization of the latest SEA certification unit. To identify affected communities, see the KBDD RSPO 2022 guide."
124	4.2.1	"Term translation affected to impacted is suggested. It must be explained that: The documents related to the CLPI, including maps and compensation procedure, only apply if there is any pending genuine dispute over any land in existing operations."
125	4.2.1	Translation to impacted communities is suggested, the word affected in Spanish is understood that it is something negative
126	4.2.1	"4.2.1 (c) A list of communities will be identified impacted (positive or negatively) that exist within the proposed area for any new plantation or new development in existing operations, through the EISA or a review of the current management and monitoring plan of the EISA of the certification unit. To identify the impacted communities, see the guide RSPO on free, prior and informed consent (CLPI) of 2022."
127	4.2.1	"It is suggested to change the translation of the terms affected to impacted. Define the scope of new developments, since at the meeting they established that the term did not apply for existing plantations or operations."
128	4.2.1	Translation to impacted communities is suggested given to negative connotation of affected.
129	4.2.1	"It is suggested to change term translation affected to impacted. According to the accepted objection: Accepted objection of the producers: the documents related to the CLPI, including the maps and the compensation procedure, only apply if there is any case pending genuine dispute over any land in existing operations."
130	4.2.2	4.2.2 What if the affected parties have none of this? How would the "affected parties" then proceed?

#	Indicator	Comment (English)
131	4.2.2	"The Unit of Certification must also prove that all the information communicated has been understood by the local population, in their native language, following the FPIC process."
132	4.2.2	"The Unit of Certification must also prove that all the information communicated has been understood by the local population, in their native language, following the FPIC process."
133	4.2.2	[Accra WS] 4.2.2 a)The issue with 'history' - how to get the history of land tenure? It is not possible to get a list of historical land tenure as they may not available.
134	4.2.2	"a) History of land tenure may not be always be available b) legal ownership or lease should already dealt under 2.1.3 "
135	4.2.2	"How should we define Vulnerable Groups and any example for this group of people? To elaborate more on the Vulnerable Group. "
136	4.2.2	"Suggest to correct the wording ' provide the following documents: a) History of land tenure;' to 'a) Information on land tenure' [4.2.2 deals with the units of certification (UoC) conducting land tenure and user assessments through engagement with identified affected groups and then requires the UoC to provide 3 documents. And if we look at the documents that have been listed there, the first one is the history of the land tenure, the second one is the legal ownership or lease and then the third one is authorization to use the land. But on the history of the land tenure, you don't necessarily have documents that will show the history of the land tenure. Usually during the study of land tenure the process is described in the report i.e. information on land tenure rather than the history of land tenure]. "
137	4.2.2	"4.2.2 a and 4.2.2.b should be moved up to 4.2.1, as these are about the evidence collected through Land tenure and Use study that allows to identify which are the affected communities. But it is missing a third point to cover the required evidence of customary users which could be covered by the text currently presented for the indicator 4.2.3) Indicator 4.2.2 should instead focus on the evidence of autorisation to use the land by the right holders. Something like: 4.2.2. The Unit of Certification has documented authorisation to use the land, received from the legal or customary owners or users, and/or their freely self-chosen representatives. "
138	4.2.2	The Unit of Certification must also prove that all the information communicated has been understood by the local population, in their native language, following the FPIC process.
139	4.2.2	[Accra WS] 4,2,2 C) it may not be available e.g. land leased from state.

#	Indicator	Comment (English)
140	4.2.2	The Unit of Certification must also prove that all the information communicated has been understood by the local population, in their native language, following the FPIC process.
141	4.2.2	Anything to do affected parties in existing operations, let SEIA in P3 take care of it and do not mix up with FPIC for new plantings/new developments as per 4.1.1. SEIA would suffice if there is any conflicts/grievance from affected parties. This entire principles are in a mess after revamp. All in all, remain FPIC concept in P&C 2018 and revert back to the original text for P4 in P&C 2018.
142	4.2.2	For indicators 4.2.2 can be combined with indicators 4.1.2 because the fulfillment is the same (both implementation and documentation)
143	4.2.2	Proposed: Indicator 4.2.2 is combined with indicators 4.1.2 because the fulfillment is the same (both implementation and documentation). So that there will be repetition.
144	4.2.2	Proposed: Indicator 4.2.2 is combined with indicators 4.1.2 because the fulfillment is the same (both implementation and documentation). So that there will be repetition.
145	4.2.2	"Proposal: Indicator 4.2.2 is combined with indicators 4.1.2 because the fulfillment is the same (both implementation and documentation). So that there will be repetition. "
146	4.2.2	Proposed: preferably indicators 4.2.2 combined with indicators 4.1.2 because the substance and fulfillment are the same (both implementation and documentation)
147	4.2.2	"4.2.2: It is necessary to clarify that the ""C"" point regarding the permit to utilize the land from the previous owner of the owner and user of the previous customary land, or representatives chosen by the law or customary owner only applies to new plantations / new land. The consideration is not to practice asking permission / approval for an established / existing area, where land owners or customs that have received compensation from the company have given permission to use their land, so this is irrelevant if done for existing plantations ."
148	4.2.2	"Proposal: Indicator 4.2.2 is combined with indicators 4.1.2 because the fulfillment is the same (both implementation and documentation) "
149	4.2.2	" Proposal: Combining indicators 4.2.2 with indicators 4.1.2 because the fulfillment of both implementation and documentation is similar. "
150	4.2.2	Indicator 4.2.2 is put forward to: combined with indicators 4.1.2 because the fulfillment is the same (both implementation and documentation).

#	Indicator	Comment (English)
151	4.2.2	Indicator 4.2.2 is put forward to: combined with indicators 4.1.2 because the fulfillment is the same (both implementation and documentation).
152	4.2.2	"[I] 4.2.2 Indicator 4.2.2 combined with indicators 4.1.2 Because the fulfillment is the same (both implementing and documentation), the indicator has the same substance and fulfillment"
153	4.2.2	"Proposed changes: Indicator 4.2.2 is combined with indicators 4.1.2 because the fulfillment is the same (both implementation and documentation) "
154	4.2.2	For 4.2.2 translation of terms affected to impacted is suggested. It must be explicit that: the documents related to the CLPI, including maps and compensation procedure, only apply if there is any pending genuine dispute over some land in existing ones.
155	4.2.2	4.2.2 For new plantations, the certification unit will show the possession and use of the land, through dialogue with the identified communities and applicable legal requirements.
156	4.2.2	"Term translation of affected parties to impacted parts is suggested. It is suggested that the scope based on official listings or groups that demonstrate legitimate interest and that is supported in the methodology established by the UDC be delimited to identify these parties."
157	4.2.3	4.2.3 If the affected parties have no legal tenure and only historical occupation without legal documentation, how would the FPIC process proceed?
158	4.2.3	Photos and satellite images can also be supplied - to make documents more comprehensible to all stakeholders.
159	4.2.3	"Photos and satellite images can also be supplied - to make documents more comprehensible to all stakeholders."
160	4.2.3	"Photos and satellite images can also be supplied - to make documents more comprehensible to all stakeholders."
161	4.2.3	" no necessity to follow the scale stated where it might distort or limit the UoC aerial view since there is a different ha of UoC. Suggested the scale "(1:5000 or 1:10000)" to be removed. "
162	4.2.3	[Sandakan, 21 June 2023] Participatory mapping would be sensitive to some Affected Communities.
163	4.2.3	"Indicator 4.2.3: Determination of map scale 1: 5000 or 1: 10000 needs to be given an explanation for the reasons for the selection of the scale. It is recommended that this scale is only included in the guide for indicators 4.2.3"
164	4.2.3	In indicators 4.2.3 the sentence should be returned as indicators 4.4.3 in 2018, namely "a map with a scale that should be" because some locations or regions require a more detailed scale for clarity.

#	Indicator	Comment (English)
165	4.2.3	"Indicator 4.2.3 Proposed: The sentence proposal is returned to the indicator 4.4.3 of 2018, ""Map with a scale should"" "
166	4.2.3	"[I] 4.2.3 The sentence proposal is returned to the indicator 4.4.3 in 2018, ""Map with a scale should"". The map scale should be adjusted so that the map can be used"
167	4.2.3	The need for sentence changes in indicators 4.2.3: The sentence proposal is returned to the indicator 4.4.3 in 2018, "Map with a scale should"
168	4.2.3	"Proposal 4.2.3: Proposed sentences related to the map scale are returned to the indicator 4.4.3 in 2018, namely ""maps with a scale that should be"" "
169	4.2.3	Proposed 4.2.3: Proposed sentences related to the scale of the map are returned to the indicator 4.4.3 in 2018 namely "Map with a scale should"
170	4.2.3	Indicator 4.2.3 (c) Proposed to: The sentence is returned to the indicator 4.4.3 in 2018 namely "map with a scale should".
171	4.2.3	"Comment: The sentence proposal is returned to the indicator 4.4.3 of 2018, ""Map with a scale should"" Proposed improvement: 4.2.3 (c) Maps with a proper scale, which indicates the extent to which legal rights, customary rights, or other recognized land use rights, must be available and arranged through participatory mapping with affected communities (including vulnerable groups, communities in adjacent areas , and the authorities). "
172	4.2.3	"Proposed indicator 4.2.3 The sentence proposal is returned to the indicator 4.4.3 of 2018, ""Map with a scale should"" "
173	4.2.3	The sentence proposal is returned to the indicator 4.4.3 of 2018, "Map with a scale should"
174	4.2.3	The indicator sentence is returned to the indicator 4.4.3 in 2018, "Map with a scale that should be"
175	4.2.3	Proposed Indicator 4.2.3 The sentence proposal is returned to the indicator 4.4.3 in 2018 namely "Map with a scale should"
176	4.2.3	Check the definition of the term "vulnerable groups", is broad and a methodology has not been included to identify them.

#	Indicator	Comment (English)
177	4.2.3	"4.2.3 (c) Maps will be prepared and made available adequate scale (1: 5000 or 1: 10000) that show the Extension of recognized land use rights of legal, customary or other type.} When there is conflict, a participatory mapping will be made that involves the affected communities and relevant authorities, if applied."
178	4.2.3	This evaluation should be carried out only when there are conflicts, as part of the resolution this evaluation must be carried out.
179	4.2.3	Term translation of affected parties to impacted parts is suggested. It is suggested that the scope based on official listings or groups that demonstrate legitimate interest and that is supported in the methodology established by the UDC be delimited to identify these parties.
180	4.2.3	Participatory mapping should be limited to involving only the group, community or directly impacted authority that has been previously selected with the methodology defined by the UDC
181	4.2.3	It is suggested that the scope based on official listings or groups that demonstrate legitimate interest and that is supported in the methodology established by the UDC be delimited to identify these parties.
182	4.2.4	4.2.4 This indicator has never been effectively tested. It attempts to secure food and water resources for the 'affected community through the SEIA process and land use planning. In addition, to this, there is also the land allocation process. This is a long-drawn, complex indicator and it is not auditable. What is the objective evidence required to seek conformance? The art of standard development and indicator framing is lost in this document. The logical flow is missing.
183	4.2.4	4.2.4 (c) As part of the CLPI, food supply and water supply options will be considered, in order to locally guarantee food safety and water resource.
184	4.2.4	For 4.2.4 according to the objection of the producers. It is suggested to change the term affected by directly impacted.
185	4.2.4	"Keep in mind that the Spanish translation of the affected term, in Spanish has a negative connotation, we suggest using the impact (positive or negative) because it diverts the term used and in the principle 4 that in some cases is spoken of affected as affected as Negative is not coincident." "

#	Indicator	Comment (English)
186	4.2.4	<p>"Incomplete indicator in translation, although we suggest that the concept of impacted communities is addressed instead of affected communities. The term ""affected"" in Spanish according to the SAR defines it</p> <p>Of the part. to affect.</p> <p>1. adj. That suffers from affectation. Speaker, affected style.</p> <p>2. adj. Aquejo, disturbed.</p> <p>While the term ""impacted"" or ""linked"" to refer to those communities that are within the area of influence of the operation of the crop or extractor plant."</p>
187	4.2.4	<p>"It is suggested to change the term affected by directly impacted.</p> <p>According to the objection of the producers:</p> <p>Objection of the producers accepted: eliminate this indicator, since it is covered by criteria 3.4."</p>
188	4.2.5	4.2.5 Packing 4 previous indicators into 1 defies logic, how is this auditable? There should be a separate report detailing these requirements for the auditor to assess.
189	4.2.5	The RSPO must support growers and mills in understanding the FPIC process and its implementation in order to increase efficiency in the field and mitigate the future risk of grievances.
190	4.2.5	A taskforce should be set up to jointly define the objective, quantifiable and/or qualifiable criteria to be audited eventually.
191	4.2.5	A taskforce should be set up to jointly define the objective, quantifiable and/or qualifiable criteria to be audited eventually.
192	4.2.5	line break
193	4.2.5	A taskforce should be set up to jointly define the objective, quantifiable and/or qualifiable criteria to be audited eventually.
194	4.2.5	"A taskforce should be set up to jointly define the objective, quantifiable and/or qualifiable criteria to be audited eventually. "
195	4.2.5	remove "in a form and language understood by affected communities (...)" it is already stated at the end of the indicator.
196	4.2.5	The RSPO must support growers and mills in understanding the FPIC process and its implementation in order to increase efficiency in the field and mitigate the future risk of grievances.
197	4.2.5	[Sandakan, 21 June 2023] FPIC should be law-abiding, subjected to the rules of national regulation.

#	Indicator	Comment (English)
198	4.2.5	"Indicator 4.2.5 The contents of this indicator are very detailed in explaining the requirements. This indicator should only mention the need for KBDD as a requirement for new planting. The contents of the KBDD documentation include the agreed agreement that will automatically adjust to the RSPO KBDD guide, plus adjustments that will see cases after case of the KBDD process. Even if you want to write down in detail the expected content of a KBDD results document, it is enough to be described in the guide section of the indicator 4.2.5"
199	4.2.5	"Proposed changes: 4.2.5 The KBDD process carried out must include documented evidence as follows: a) Important Information - All important information related to the proposed development must be available and explained in the form and language understood by the affected community (including vulnerable groups). This includes information related to the impact assessment, the distribution of proposed benefits, and legal agreements. b) Independent Access to Information - The existence of evidence that the affected community and the right holder have an option to access information and suggestions related to the consequences of the legal, economic, environmental, and social implications of the proposed operations on their land, and the evidence is not influenced by the project initiator. c) Consultation and Negotiations Joint - A process must be mutually agreed upon through consultation and negotiations carried out in good faith with affected communities in indicators 4.2.1 to achieve decisions related to the proposed development. Various steps are taken to involve and consult with vulnerable groups. People who were directly affected were given information about their rights to reject the development during the KBDD process. d) Approval - negotiations must be carried out without coercion and voluntarily, as well as considering the form of consultation and approval according to custom as the user's request or rights holder. There is evidence that the certification unit respects the affected community's decision to give or suspend its agreement to the operation when the decision was taken. e) Implications of approval - Communities that are directly affected must be given an explanation by the Certification Unit related to the implications of the development licensing, and the legal status of land when the right to use, concession, or lease the land unit is expired. All communication must be carried out in the form and language understood by people who are directly affected (including groups that are vulnerable and cannot read and write). "
200	4.2.5	4.2.5: The word "repeated" is deleted. It takes a clear definition because if the MoU and the garden have been built, then it is not possible for the KBDD process to be repeated.
201	4.2.5	For 4.2.5 according to objection but it is suggested to expand to having clear mechanisms to demonstrate the legitimate interest of participation in CLPI procedures.
202	4.2.5	4.2.5 According to the objection but it is suggested to expand to having clear mechanisms to demonstrate the legitimate interest of participation in CLPI procedures.

#	Indicator	Comment (English)
203	4.2.5	"4.2.5 The CLPI process will include documented evidence of: a) Key information: Information related to decision making on the proposed development (impact evaluations and proposed agreements). b) Remove this item c) Mutual consultation and negotiation: Mutually agreed and in good faith a process of consultation and negotiation with the identified communities. The directly affected communities will be informed about their right to say 'no' to development throughout the CLPI process. d) Consent: negotiations will happen without coercion and voluntarily and will take into account the customary forms of consultation and consent if they request users or rights holders. Exists evidence that the UDC has respected the decisions of the affected communities of giving or denying their consent to operations at the time these decisions were made. e) Implications of the Agreement: When applying, the UDC will explain to the communities directly affected the implications of allowing the development and legal status of the lands when the title, concession or lease of the UDC takes. All communications will be made in a form and language that they understand by those involved."
204	4.2.5	[Abidjan WS] 4.2.5 b - it is not the responsibility of the UoC - no action is needed - need to make clear.
205	4.2.6	The RSPO must take into account and even make available the means to defend local populations affected by a case of grievance at a lower cost.
206	4.2.6	The latter do not always have the financial or human resources to represent their interests themselves.
207	4.2.6	The latter do not always have the financial or human resources to represent their interests themselves.
208	4.2.6	"4.2.6. The RSPO must take into account and even make available the means to defend local populations affected by a case of grievance at a lower cost. The latter do not always have the financial or human resources to represent their interests themselves."
209	4.2.6	The RSPO must take into account and even make available the means to defend local populations affected by a case of grievance at a lower cost. The latter do not always have the financial or human resources to represent their interests themselves.
210	4.2.6	[Accra WS] 4.2.6 How to audit 'option of resourced access'? What is the responsibility of UoC and how much is consider enough?
211	4.2.6	4.2.6. Quite that the company must provide legal advice or aid, because it becomes a conflict of interest.

#	Indicator	Comment (English)
212	4.2.6	"4.2.6 There will be evidence available to demonstrate that directly affected communities are represented by institutions or representatives chosen by them same. ---- It is not objective that the UDC must pay for some legal process. The maximum that can be done is to inform (guide) about institutions that can support the affected people or communities."
213	4.2.6	Incomplete indicator in translation
214	4.2.6	"Cutted text appears but having Excel could see complete. I suggest: facilitate access to the roadmap of the parts in which they can be supported to be represented without having the UDEC who assumes the costs of that representation."
215	4.2.6	Incomplete indicator in translation
216	4.2.6	According to the objection but it is suggested to expand to having clear mechanisms to demonstrate the legitimate interest of participation in CLPI procedures.
217	4.2.6	In order to prevent the indicator from being used for other purposes, the company cannot be responsible for legal or technical advice, rather the company may facilitate access to the roadmap of the parties in which they can be supported to be represented without being the UdeC who assumes the costs of that representation.
218	4.2.6	4.2.6. Companies should not provide legal advice or aid, because it becomes a conflict of interest.
219	4.2.6	It is suggested to change the term affected by impacted
220	4.2.6	4.2.6 Remove from the writing the option of resources to access legal advisors, this goes against the principle of impartiality at the time of these disputes.
221	4.2.7	4.2.7 The essence of indicator 4.4.2 (2018 P&C) is lost.
222	4.2.7	4.2.7. Nor do they always have access to clear information on their rights and their means of action.
223	4.2.7	Nor do they always have access to clear information on their rights and their means of action.
224	4.2.7	Nor do they always have access to clear information on their rights and their means of action.
225	4.2.7	Nor do they always have access to clear information on their rights and their means of action.
226	4.2.7	not applicable to existing plantations
227	4.2.7	"The text of the indicator is cut, so Excel was requested. It is suggested to change the term affected by impacted"
228	4.2.8	4.2.8 Too many requirements in an indicator. Not auditable.

#	Indicator	Comment (English)
229	4.2.8	access to a legal representative - free or at a reduced cost - would be the first thing to be offered to local communities
230	4.2.8	"access to a legal representative - free or at a reduced cost - would be the first thing to be offered to local communities"
231	4.2.8	"negotiated FPIC agreement"
232	4.2.8	4.2.8. access to a legal representative - free or at a reduced cost - would be the first thing to be offered to local communities
233	4.2.8	access to a legal representative - free or at a reduced cost - would be the first thing to be offered to local communities
234	4.2.8	"In indicator 4.2.8 there are several proposals, namely: - In point a the word ""and"" changed to ""or"" - In point a the word ""representative"" added ""representative of landowners"" - At the point F sentence ""re-negotiations, renewal and termination"" should be examined and confirmed in accordance with applicable regulations and laws"
235	4.2.8	"Proposed indicator 4.2.8: - The word ""and"" in point A should be changed to ""or"" - The word ""representative"" in point A is clarified as ""Representative of the Land Owner"" - The sentence ""re-negotiating, renewing and terminating"" in point F needs to be ascertained in accordance with applicable regulations and laws"
236	4.2.8	a) changed to "party or representative" because not all landowners appoint their representatives
237	4.2.8	"Proposed improvement 4.2.8: - The word ""and"" in point A should be changed to ""or"" - The word ""representative"" in point A was added to ""Representative of the Land Owner"" - The sentence ""re -negotiating, renewing and terminating"" in point F is added in accordance with applicable national regulations and laws"
238	4.2.8	"4.2.8: the word ""and"" changed to ""or"" because not all The landowner appoints his representative, and if any representatives, communication is carried out through the representative, and if there are no representatives then communication is carried out directly to the owner land."
239	4.2.8	Proposed Indicator 4.2.8: - The word "and" in point A should be changed to "or" - the word "representative" in point A is clarified to "representative of landowners" in accordance with applicable regulations and laws

#	Indicator	Comment (English)
240	4.2.8	Comments: - The word "and" in points A should be changed to "or" - the word "representative" in point A is clarified to "representative of the landowner" - the phrase "re -negotiating, renewal and stopping" in point F needs to be observed and confirmed there is a basis /references include in accordance with the applicable regulations and legislation proposed changes: 4.2.8 Agreement on the results of negotiations includes: a) the party or representative of the landowner from the agreement; b) duration or duration of development and other implications of the agreement; c) compensation and benefits; d) the mechanism for handling complaints and complaints; e) conflict resolution mechanism; and f) Provisions for monitoring agreements in accordance with applicable national law.
241	4.2.8	"[I] 4.2.8 - The word ""and"" in point A should be changed to ""or"" - The word ""representative"" in point A is clarified as ""Representative of the Land Owner"" - The sentence ""re-negotiating, renewing and terminating"" in point F needs to be examined and confirmed in accordance with applicable regulations and regulations"
242	4.2.8	"4.2.8: The sentence ""re -negotiating, renewal and termination ""added"" in accordance with regulations and current regulation"""
243	4.2.8	"Indicator 4.2.8 is proposed to: 1. The word ""and"" in point A should be changed to ""or"". 2. The word ""representative"" in point A is clarified as ""representative of landowners"". 3. The sentence ""re-negotiating, renewing and terminating"" in point F needs to be examined and confirmed in accordance with applicable regulations and regulations."
244	4.2.8	4.2.8: the word "and" changed to "or" because not all landowners appoint their representatives, and if there are representatives, communication is carried out through these representatives, and if there are no representatives, communication is carried out directly to the landowners.
245	4.2.8	Proposed improvement 4.2.8: (a). The word "and" in point A should be changed to "or", (B). The word "representative" in point A was added to "representative of landowners", (c). The sentence "re -negotiating, renewing and terminating" in point F is added in accordance with applicable national regulations and laws

#	Indicator	Comment (English)
246	4.2.8	<p>"Comment:</p> <ul style="list-style-type: none"> - The word ""and"" in point A should be changed to ""or"" - The word ""representative"" in point A is clarified as ""Representative of the Land Owner"" - The sentence ""re-negotiating, renewing and terminating"" in point F needs to be observed and confirmed there is a basis/reference including in accordance with applicable regulations and regulations <p>Proposed changes:</p> <p>4.2.8 Agreement on the results of negotiations includes:</p> <ul style="list-style-type: none"> a) Party or representative of landowners from the agreement; b) duration or duration of development and other implications of the agreement; c) compensation and benefits; d) the mechanism for handling complaints and complaints; e) conflict resolution mechanism; And f) Provisions for monitoring agreements in accordance with applicable national law. <p>"</p>
247	4.2.8	<p>"Indicator 4.2.8 Proposed:</p> <ul style="list-style-type: none"> - The word ""and"" in point A should be changed to ""or"" - The word ""representative"" in point A is clarified as ""Representative of the Land Owner"" - The sentence ""re-negotiating, renewing and terminating"" in point F needs to be examined and confirmed in accordance with applicable regulations and regulations"
248	4.2.8	4.2.8: The sentence "re-negotiating, renewal and termination" added "in accordance with applicable regulations and laws".
249	4.2.8	<p>"- The word ""and"" in point A should be changed to ""or""</p> <ul style="list-style-type: none"> - The word ""representative"" in point A is clarified as ""Representative of the Land Owner"" - The sentence ""re-negotiating, renewing and terminating"" in point F needs to be examined and confirmed in accordance with applicable regulations and regulations"
250	4.2.8	Compensation refers to "compensation"
251	4.2.8	Define "compensation"

#	Indicator	Comment (English)
252	4.2.8	"4.2.8 If there is a negotiated agreement, it will include: a) Parties and representatives in the agreement; b) Development duration and any other aspect that imply the agreement; c) Type of negotiation (compensation or agreement) d) claims and complaint mechanism; e) Conflict resolution mechanism, and f) Provisions for monitoring, renegotiation, renewal and termination of compliance with legislation applicable national"
253	4.2.8	Eliminate this indicator, since it is covered by criterion 3.4.
254	4.2.8	Compensation refers to "compensation"?
255	4.2.8	Delete indicator, it is already covered.
256	4.2.9	4.2.9 The negotiated agreement should be signed by the legal representative of the UoC.
257	4.2.9	access to a legal representative - free or at a reduced cost - would be the first thing to be offered to local communities
258	4.2.9	"negotiated FPIC agreement"
259	4.2.9	4.2.9. access to a legal representative - free or at a reduced cost - would be the first thing to be offered to local communities
260	4.2.9	"access to a legal representative - free or at a reduced cost - would be the first thing to be offered to local communities"
261	4.2.9	access to a legal representative - free or at a reduced cost - would be the first thing to be offered to local communities
262	4.2.9	"In indicator 4.2.9 - The word ""and/or"" just use the word ""or"" - ""Representative Institution"" was changed to ""Representative of Land Owners"""
263	4.2.9	"Indicator 4.2.9 Proposed: - The sentence ""and"" eliminated, just use the word ""or"" - ""Representative Institution"" was changed to ""Representative of Land Owners"""
264	4.2.9	4.2.9: The word "and" replaced with "or" "because not all landowners appoint their representatives, and if there are representatives, communication is carried out through these representatives, and if there are no representatives, communication is carried out directly to the landowner.

#	Indicator	Comment (English)
265	4.2.9	"Proposed improvement 4.2.9 ' - The sentence ""and"" eliminated, only using the word ""or"" - ""Representative Institution"" was changed to ""Representative of Land Owners""
266	4.2.9	"[I] 4.2.9 The sentence ""and"" eliminated, just use the word ""or"" ""representative institution"" was changed to ""representative of landowners""
267	4.2.9	4.2.9: Definition added that the "representative institution" in question is a representative institution from the landowner.
268	4.2.9	""Comment: - The word ""and"" eliminated, just use the word ""or"" - ""Representative Institution"" was changed to ""Representative of Land Owners"" Proposed changes: 4.2.9 Agreement on the results of negotiations must be signed by the Certification Unit, directly affected communities or representatives of landowners. A copy must be given to all parties who signed an agreement, In the form and language understood by all parties in the agreement."
269	4.2.9	"4.2.9: the words ""and"" replaced with ""or"" ""because it is not all landowners appoint their representatives, and if any representatives, communication is carried out through the representative, and if there are no representatives then communication is carried out directly to the owner land."
270	4.2.9	"Proposed indicator 4.2.9: '- The sentence ""and"" eliminated, just use the word ""or"" - ""Representative Institution"" was changed to ""Representative of Land Owners""
271	4.2.9	"4.2.9: Definition is added that ""Representative Institution"" What is meant is a representative institution from the owner land."
272	4.2.9	Indicator 4.2.9 is proposed in order to: 1. the word "and" eliminated, just use the word "or". 2. The word "representative institution" was changed to "representative of landowners".
273	4.2.9	Indicator 4.2.9 is proposed in order to: (a). The word "and" eliminated, just use the word "or". (b). The word "representative institution" was changed to "representative of landowners".
274	4.2.9	""- The sentence ""and"" eliminated, just use the word ""or"" - ""Representative Institution"" was changed to ""Representative of Land Owners""
275	4.2.9	"Indicator 4.2.9 is proposed to: 1. The word ""and"" eliminated, just use the word ""or"". 2. The word ""representative institution"" was changed to ""representative of landowners""."

#	Indicator	Comment (English)
276	4.2.9	Keep in mind that the Spanish translation of the affected term, in Spanish has a negative connotation, we suggest using the impact (positive or negative) because it diverts the term used and in the principle 4 that in some cases is spoken of affected as affected as Negative is not coincident.
277	4.2.9	"Impacted" or "linked" communities instead of "affected"
278	4.2.10	4.2.10 This should be a critical indicator.
279	4.2.10	"Examples of corrective measures are already to be presented by the RSPO. The same applies to fines or penalties - or even suspension of certification - in the event of wilful non-compliance by a stakeholder. To avoid any suspicion, the RSPO should help all growers and mills to familiarize themselves with the FPIC processes and assist them with their operational implementation. By communicating a global framework that can be plugged into different geographical areas and types of players"
280	4.2.10	"4.2.10. Examples of corrective measures are already to be presented by the RSPO. The same applies to fines or penalties - or even suspension of certification - in the event of wilful non-compliance by a stakeholder. To avoid any suspicion, the RSPO should help all growers and mills to familiarize themselves with the FPIC processes and assist them with their operational implementation. By communicating a global framework that can be plugged into different geographical areas and types of players "
281	4.2.10	"Examples of corrective measures are already to be presented by the RSPO. The same applies to fines or penalties - or even suspension of certification - in the event of wilful non-compliance by a stakeholder. To avoid any suspicion, the RSPO should help all growers and mills to familiarize themselves with the FPIC processes and assist them with their operational implementation. By communicating a global framework that can be plugged into different geographical areas and types of players"
282	4.2.10	Examples of corrective measures are already to be presented by the RSPO. The same applies to fines or penalties - or even suspension of certification - in the event of wilful non-compliance by a stakeholder. To avoid any suspicion, the RSPO should help all growers and mills to familiarize themselves with the FPIC processes and assist them with their operational implementation. By communicating a global framework that can be plugged into different geographical areas and types of players
283	4.2.10	"In indicator 4.2.10 1. Add an annual review guide should only include: a. Implementation of Points Preliminary Agreement Agreement on Plantation Development b. The period of fulfilling the initial agreement 2. The KBDD review process is carried out until the agreed time."

#	Indicator	Comment (English)
284	4.2.10	"Indicator 4.2.10 Proposed: 1. Add an annual review guide should only include: a. Implementation of Points Preliminary Agreement Agreement on Plantation Development b. The period of fulfilling the initial agreement 2. The KBDD review process is carried out until the agreed time."
285	4.2.10	"Proposed indicator 4.2.10 Add an annual review guide should only include: a. Implementation of Points Preliminary Agreement Agreement on Plantation Development b. The period of fulfilling the initial agreement 2. The KBDD review process is carried out until the agreed time."
286	4.2.10	Proposed, preferably on indicators 4.2.10: 1. Added Annual Review Guide should only include: a. Implementation of the initial agreement points for the approval of plantation development b. The period of fulfilling the initial agreement 2. The KBDD review process is carried out until the mutual agreed time.
287	4.2.10	"Proposal 4.2.10: 1. Add an annual review guide should only include: a. Implementation of Points Preliminary Agreement Agreement on Plantation Development b. The period of fulfilling the initial agreement 2. The KBDD review process is carried out until the agreed time."
288	4.2.10	"4.2.10: added the phrase ""up to the process Garden development ends ""because of the review process Every year there must be an end time."
289	4.2.10	Comments: 1. Add Annual Review Guide should only include: a. Implementation of the initial agreement points for the approval of plantation development b. The period of fulfilling the initial agreement 2. The KBDD review process is carried out until the mutual agreed time.
290	4.2.10	The sentence is changed to "..... up to the garden development process ends" because the review process every year must have an end.

#	Indicator	Comment (English)
291	4.2.10	"1. Add an annual review guide should only include: a. Implementation of Points Preliminary Agreement Agreement on Plantation Development b. The period of fulfilling the initial agreement 2. The KBDD review process is carried out until the agreed time."
292	4.2.10	Proposal 4.2.10: (1). Added Annual Review Guide should only include: a. Implementation of the initial agreement points for the approval of plantation development b. The period of fulfilling the initial agreement. (2). The KBDD review process is carried out until the agreed time.
293	4.2.10	"[I] 4.2.10 1. Add an annual review guide should only include: a. Implementation of Points Preliminary Agreement Agreement on Plantation Development b. The period of fulfilling the initial agreement 2. The KBDD review process is carried out until the agreed time."
294	4.2.10	Indicator 4.2.10 is proposed in order to: 1. Added Annual Review Guide should only include: a. Implementation of the initial agreement points for the approval of plantation development b. The period of fulfilling the initial agreement 2. The KBDD review process is carried out until the mutual agreed time.
295	4.2.10	"Comment: 1. Add an annual review guide should only include: a. Implementation of Points Preliminary Agreement Agreement on Plantation Development b. The period of fulfilling the initial agreement 2. The KBDD review process is carried out until the agreed time."
296	4.2.10	4.2.10: The phrase added "until the garden development process ends" because the review process every year must be ended.
297	4.2.10	Incomplete indicator in translation
298	4.2.11	"not clear at all. Indicators are applicable no need to specify it... except 4.2.7 which is not applicable to existing plantations"
299	4.2.11	4.2.11 This is a retrospective FPIC requirement that predates the establishment of RSPO. This is unacceptable, irrespective of what certain parties think. There is always a cut-off line otherwise the indicator will become non-sensical.
300	4.2.11	How is an FPIC done retroactively? How relevant would that be?
301	4.2.11	[Accra WS] 4.2.11 - removed. Not practical to do retrospective FPIC - area is cleared. This should be dealt under SEIA - where new community identify and management needed.

#	Indicator	Comment (English)
302	4.2.11	Please review this new indicator 4.2.11 and correct the mistake as there is no indicators 4.6.2-4.6.6. ["Indicators 4.5.1 to 4.5.4 and 4.6.1- 4.6.6 shall apply where relevant."]. There is a mistake here only 4.6.1 exists, there is no 4.6.2 - 4.6.6. What indicators are you referring here?]
303	4.2.11	Sustained objection. Anything to do affected parties in existing operations, let SEIA in P3 take care of it and do not mix up with FPIC for new plantings/new developments as per 4.1.1. SEIA would suffice if there is any conflicts/grievance from affected parties. This entire principles are in a mess after revamp. All in all, remain FPIC concept in P&C 2018 and revert back to the original text for P4 in P&C 2018.
304	4.2.11	"[HRSS] There is a gap in this indicator - it only addresses the applicability of FPIC to existing operations set up before 2005. There is a need to incorporate an indicator on the applicability of FPIC to a UoC's existing operations which was set up after 2005 as the preceding Indicator 4.1.1 also do not address this and only touches on new plantings and developments. The references to Indicators on FPIC processes have been stated incorrrectly. The FPIC processes are set out in Indicators 4.2.1 to 4.2.10 and 4.2.12. The current text has missed out the applicable Indicators 4.2.8 to 4.2.10 and 4.2.12 (negotiations, review of FPIC agreement and compensation for dispossessed communities). It is important to include them as they are part of the FPIC processes. Similarly, Indicators 4.3.1 to 4.3.4 (compensation) and 4.4.1 to 4.4.5 (conflict resolution) are also excluded. Indicators 4.6.2 to 4.6.6 do not exist in Draft 2. Therefore, the 2nd sentence should read ""...the FPIC processes set out in Indicators 4.2.1 to 4.2.10 and 4.2.12 shall apply. Indicators 4.3.1 to 4.3.4 and 4.4.1 to 4.4.5 shall apply where relevant.""
305	4.2.11	4.2.11 What do you mean by "where relevant"? Who determines the relevancy in this matter?
306	4.2.11	"[HRWG] Recommendation: A compensation process or procedure may be more appropriate for cases where Communities are found on existing plantations. Align this with the RaCP process for HCV. In the RaCP, there are different dates between 2005 and now. It establishes the consequences of a clearance (including compensation) based on when a clearance of a HCV area was conducted. We need to look at when FPIC was first introduced (i.e. after 2005) and determine the consequences based on when a clearing without FPIC happened. Retrospective application of FPIC may cause legal uncertainty and therefore access to compensation processes may be the best way forward. For compensation, the start date should not pre-date when FPIC was first introduced to RSPO i.e. from 2005. "

#	Indicator	Comment (English)
307	4.2.11	"In this 4.2.11 indicator - it is proposed to be deleted, because the KBDD only applies to the new planting, following the 2015 guide 2. Historical FPIC has been arranged as follows: - FPIC has emerged in 2005, but there is no guide - In 2008, RSPO asked FPP to compile guidelines, but has not been approved by RSPO - Approved Guide in 2015"
308	4.2.11	4.2.11 This indicator should be removed because it is not consistent with indicator 4.2.1 where affected people need to be considered if there are new planting plans or new development in existing operational areas. So for operations that have been running, things about FPIC are not needed.
309	4.2.11	4.2.11: The indicator is deleted, because KBDD only applies to new planting with a cut-off date implementation of FPIC according to the 2015 FPIC RSPO guide.
310	4.2.11	"Proposal: 1. Proposed indicator 4.2.11 is deleted, because the KBDD UK is irrelevant, KBDD should only be for gardens for new planting, following the 2015 FPIC guide 2. It is specifically determined by the KBDD only applies to gardens planted after November 2015 after the issuance of the November 2015 FPIC Revision Guide "
311	4.2.11	"Proposed indicator 4.2.11 Indicator was deleted because KBDD only applies to new plants, following the 2015 guidelines."
312	4.2.11	Proposal: This indicator is proposed to be deleted, because the KBDD guide is more relevant for the new planting (after the FPIC guide published), following the 2015 guide *Historical FPIC - FPIC has appeared in 2005, but there has been no guide - in 2008, RSPO asked FPP to compile Guide, but not yet approved RSPO - Approved Guide in 2015
313	4.2.11	"[I] 4.2.11 Proposal 1. The proposal of this indicator to be deleted, because the KBDD only applies to the new planting, following the 2015 guide 2. Historical FPIC has been arranged as follows: - FPIC has emerged in 2005, but there is no guide - In 2008, RSPO asked FPP to compile guidelines, but has not been approved by RSPO - Approved Guide in 2015 "

#	Indicator	Comment (English)
314	4.2.11	<p>"Indicator 4.2.11 Proposed:</p> <ol style="list-style-type: none"> 1. The proposal of this indicator to be deleted, because the KBDD only applies to the new planting, following the 2015 guide 2. Historical FPIC has been arranged as follows: <ul style="list-style-type: none"> - FPIC has emerged in 2005, but there is no guide - In 2008, RSPO asked FPP to compile guidelines, but has not been approved by RSPO - Approved Guide in 2015"
315	4.2.11	<p>"4.2.11: The indicator is deleted, because KBDD only applies to New Planting With Cut-off Date Implementation of FPIC according to the 2015 FPIC RSPO guide.</p> <p>*Historical FPIC</p> <ul style="list-style-type: none"> • FPIC has emerged in 2005, but not yet guide • In 2008, RSPO asked FPP to compile guide. • In 2015, the RSPO was on the FPIC guide based on the results of public consultation and compiled by involving the Multi-Stakeholder Forum."
316	4.2.11	<p>"This indicator is proposed to be deleted, because the KBDD only applies to the new planting, following the 2015 guide</p> <p>*Historical FPIC</p> <ul style="list-style-type: none"> - FPIC has emerged in 2005, but there is no guide - In 2008, RSPO asked FPP to compile guidelines, but has not been approved by RSPO - Approved Guide in 2015 <p>"</p>

#	Indicator	Comment (English)
317	4.2.11	"Proposal: This indicator is proposed to be deleted, because the KBDD guide is more relevant for new planting (after the FPIC guide published), following the 2015 guide *Historical FPIC - FPIC has emerged in 2005, but there is no guide - In 2008, RSPO asked FPP to compile guidelines, but has not been approved by RSPO - Approved Guide in 2015 "
318	4.2.11	Proposed: (1). Indicator 4.2.11 was proposed to be deleted, because the KBDD UK Old Garden Garden was irrelevant, KBDD should only be for new gardens for new handling, following the 2015 FPIC guidelines. (2). Revision Guide November 2015
319	4.2.11	"1.) This indicator to be deleted, because the KBDD only applies to the new planting, following the 2015 guide; 2.) Historical FPIC has been regulated as follows: FPIC has appeared in 2005, but there has been no guide. - In 2008, RSPO asked FPP to compile guidelines, but has not been approved by RSPO. - Approved Guide in 2015."
320	4.2.11	"Indicator 4.2.11 is proposed to: 1. This indicator is deleted, because the KBDD only applies to the new planting, following the 2015 guide. 2. Historical FPIC has been arranged as follows: - FPIC has emerged in 2005, but there has been no guide. - In 2008, RSPO asked FPP to compile guidance, but has not been approved by RSPO. - Approved Guide in 2015."
321	4.2.11	4.2.11 What is the point of doing CLPI of established plantations before 2005?
322	4.2.11	[Abidjan WS] 4.2.11 should be removed - retrospective FPIC is not possible. This is not implementable. Any new community identified will be captured by SEIA assessment, under Criteria 3.4.
323	4.2.12	"Communication of a clear timeline for handling identified grievances, This framework must be communicated and adhered to by all players, on pain of sanctions or even suspension. A scale of damages must also be published - after a multi-stakeholder taskforce has been set up to define them. "
324	4.2.12	4.2.12 Again this is difficult to audit. What is meant by "time-bound manner"?
325	4.2.12	"Communication of a clear timeline for handling identified grievances This framework must be communicated and adhered to by all players, on pain of sanctions or even suspension. A scale of damages must also be published - after a multi-stakeholder taskforce has been set up to define them."

#	Indicator	Comment (English)
326	4.2.12	"4.2.12. Communication of a clear timeline for handling identified grievances. This framework must be communicated and adhered to by all players, on pain of sanctions or even suspension. A scale of damages must also be published - after a multi-stakeholder taskforce has been set up to define them."
327	4.2.12	Communication of a clear timeline for handling identified grievances This framework must be communicated and adhered to by all players, on pain of sanctions or even suspension. A scale of damages must also be published - after a multi-stakeholder taskforce has been set up to define them.
328	4.2.12	Indicator 4.2.12 is proposed so that the phrase "scheduled" changed to "in accordance with the agreement"
329	4.2.12	In indicator 4.2.12 the sentence "scheduled" is proposed to be changed to "according to the agreement"
330	4.2.12	Proposed 4.2.12: Improvement of the phrase "scheduled" to "in accordance with the agreement"
331	4.2.12	Comment: Changing the phrase "scheduled" to "in accordance with the agreement" proposed change: 4.2.12 Claims of compensation or agreement achieved through the process of resolving conflicts with the affected community or those who have been deprived of their land through acquisition or forced neglect of customary rights holders and rights Use the land before the operation carried out at this time must be carried out in accordance with the agreement.
332	4.2.12	"Proposed indicator 4.2.12 Changing the phrase ""scheduled"" to ""according to the agreement"""
333	4.2.12	"Indicator 4.2.12 Proposed: Changing the phrase ""scheduled"" to ""according to the agreement"""
334	4.2.12	4.2.12: The word "scheduled" was changed to "according to the agreement"
335	4.2.12	The word "scheduled" was changed to "in accordance with the agreement"
336	4.2.12	"[I] 4.2.12 Changing the phrase ""scheduled"" to ""according to the agreement"""
337	4.2.12	"Comment: Changing the phrase ""scheduled"" to ""according to the agreement"" Proposed changes: 4.2.12 Claims of compensation or agreement achieved through the process of resolving conflicts with affected communities or those who have been deprived of their land through acquisition or forced neglect of customary rights holders and land use rights before operations carried out at this time must be carried out in accordance with the agreement."
338	4.2.12	"4.2.12: The word ""scheduled"" was changed to ""appropriate with an agreement """
339	4.2.12	Changing the phrase "scheduled" to "according to the agreement"

#	Indicator	Comment (English)
340	4.2.12	Changing the phrase "scheduled" to "according to the agreement"
341	4.2.12	Indicator 4.2.12 is proposed to: The sentence "scheduled" is changed to "according to the agreement".
342	4.2.12	No 4.6.5 and 4.6.6
343	4.2.12	No indicator 4.6.5 and 4.6.6
344	4.3	Institutions and representatives must be facilitated by the RSPO to facilitate access to a fair defence for local populations who are sometimes poorly informed or have few financial means.
345	4.3	Institutions and representatives must be facilitated by the RSPO to facilitate access to a fair defence for local populations who are sometimes poorly informed or have few financial means.
346	4.3	Institutions and representatives must be facilitated by the RSPO to facilitate access to a fair defense for local populations who are sometimes poorly informed or have few financial means.
347	4.3	Institutions and representatives must be facilitated by the RSPO to facilitate access to a fair defense for local populations who are sometimes poorly informed or have few financial means.
348	4.3	Institutions and representatives must be facilitated by the RSPO to facilitate access to a fair defense for local populations who are sometimes poorly informed or have few financial means.
349	4.3	Institutions and representatives must be facilitated by the RSPO to facilitate access to a fair defense for local populations who are sometimes poorly informed or have few financial means.
350	4.3	Institutions and representatives must be facilitated by the RSPO to facilitate access to a fair defense for local populations who are sometimes poorly informed or have few financial means.
351	4.3	Institutions and representatives must be facilitated by the RSPO to facilitate access to a fair defense for local populations who are sometimes poorly informed or have few financial means.
352	4.3	Institutions and representatives must be facilitated by the RSPO to facilitate access to a fair defense for local populations who are sometimes poorly informed or have few financial means.
353	4.3	Institutions and representatives must be facilitated by the RSPO to facilitate access to a fair defense for local populations who are sometimes poorly informed or have few financial means.
354	4.3	Institutions and representatives must be facilitated by the RSPO to facilitate access to a fair defense for local populations who are sometimes poorly informed or have few financial means.
355	4.3	Institutions and representatives must be facilitated by the RSPO to facilitate access to a fair defence for local populations who are sometimes poorly informed or have few financial means.
356	4.3.1	A timeline of standard procedures to be published on the RSPO guidelines
357	4.3.1	"A timeline of standard procedures to be published on the RSPO guidelines"

#	Indicator	Comment (English)
358	4.3.1	4.3.1 There should be a reference made to the appropriate language. There should be a systematic review made to insert documents in the appropriate languages.
359	4.3.1	A timeline of standard procedures to be published on the RSPO guidelines
360	4.3.1	"A schedule of standard procedures should be published on the RSPO guidelines. The basis for calculating compensation or even the procedures should not mention the gender of the landowner, which is irrelevant information. In all cases, the RSPO complaints resolution mechanism must provide a clear and public timetable."
361	4.3.1	A timeline of standard procedures to be published on the RSPO guidelines
362	4.3.1	A timeline of standard procedures to be published on the RSPO guidelines
363	4.3.1	"A schedule of standard procedures should be published on the RSPO guidelines. The basis for calculating compensation or even the procedures should not mention the gender of the landowner, which is irrelevant information. In all cases, the RSPO complaints resolution mechanism must provide a clear and public timetable."
364	4.3.1	"on indicators 4.3.1 Proposed Editor in the sentence is ""a procedure must be available agreed upon by the relevant parties to identify legal rights, rights customs or rights to use, and procedures for identifying people who are entitled to compensation ""."
365	4.3.1	"Indicator 4.3.1 Proposed: Proposed sentences in indicators 4.3.1 were changed to: ""The procedure must be available agreed upon by the relevant parties to identify legal rights, customary rights or use rights, and procedures for identifying people who are entitled to compensation""."
366	4.3.1	Proposal of Pernaikan 4.3.1 (c) to become a certification unit must determine the procedures agreed upon by related parties to identify legal rights, customary rights or use rights, and procedures for identifying people who are entitled to compensation. This procedure must be carried out, monitored. This procedure must be documented and available for all stakeholders and affected communities.
367	4.3.1	"Indicator 4.3.1 Proposal: The sentence was changed to ""the procedure must be available agreed upon by the relevant parties to identify legal rights, rights customs or rights to use, and procedures for identifying people who are entitled to compensation ""."

#	Indicator	Comment (English)
368	4.3.1	"Proposed changes: 4.3.1 (c) The certification unit must determine the procedures agreed upon by related parties to identify legal rights, rights customs or rights to use, and procedures for identifying people who are entitled to compensation. This procedure must be carried out, monitored. This procedure must be documented and available for all stakeholders and affected communities."
369	4.3.1	Indicator sentences 4.3.1 should be changed to "the procedure must be agreed upon by the relevant parties to identify the legal rights, customary rights or rights of use, and procedures for identifying people who are entitled to compensation".
370	4.3.1	Proposed changes: 4.3.1 (c) The certification unit must determine the procedures agreed upon by related parties to identify legal rights, customary rights or use rights, and procedures for identifying people who are entitled to compensation. This procedure must be carried out, monitored. This procedure must be documented and available for all stakeholders and affected communities.
371	4.3.1	"[I] 4.3.1 Proposed sentences in indicators 4.3.1 were changed to: ""The procedure must be available agreed upon by the relevant parties to identify legal rights, rights customs or rights to use, and procedures for identifying people who are entitled to compensation ""."
372	4.3.1	Indicator 4.3.1 (c) It is proposed that the sentences in indicators 4.3.1 will be changed to: "The procedure must be agreed upon by the relevant parties to identify legal rights, customary rights or use rights, and procedures for identifying people who are entitled to compensation ".
373	4.3.1	"Indicator 4.3.1 (c) It is proposed that the sentence in indicator 4.3.1 is replaced to: ""The procedure must be available agreed upon by the relevant parties to identify legal rights, rights customs or rights to use, and procedures for identifying people who are entitled to compensation ""."
374	4.3.1	"Proposed sentences in indicators 4.3.1 were changed to: ""The procedure must be available agreed upon by the relevant parties to identify legal rights, rights customs or rights to use, and procedures for identifying people who are entitled to compensation ""."
375	4.3.1	It is requested to maintain 4.6.1 and 4.7.1 of the previous version. Demonstrate legitimate affectation.
376	4.3.1	It is requested to maintain 4.6.1 and 4.7.1 of the previous version. Demonstrate legitimate affectation.
377	4.3.2	4.3.2 What if the UoC is dealing with a patriarchal customary system? How would the UoC prove an equal gender opportunity for the affected communities who themselves do not believe in gender equality? For example, land inheritance in Muslim communities is usually passed down through males. And this is the case in most rural communities, especially oil palm countries in Asia.

#	Indicator	Comment (English)
378	4.3.2	<p>"A schedule of standard procedures should be published on the RSPO guidelines.</p> <p>The basis for calculating compensation or even the procedures should not mention the gender of the landowner, which is irrelevant information.</p> <p>In all cases, the RSPO complaints resolution mechanism must provide a clear and public timetable."</p>
379	4.3.2	<p>The basis for calculating compensation or even the procedures should not mention the gender of the landowner, which is irrelevant information.</p>
380	4.3.2	<p>"A schedule of standard procedures should be published on the RSPO guidelines.</p> <p>The basis for calculating compensation or even the procedures should not mention the gender of the landowner, which is irrelevant information.</p> <p>In all cases, the RSPO complaints resolution mechanism must provide a clear and public timetable."</p>
381	4.3.2	<p>"The basis for calculating compensation or even the procedures should not mention the gender of the landowner, which is irrelevant information."</p>
382	4.3.2	<p>"A schedule of standard procedures should be published on the RSPO guidelines.</p> <p>The basis for calculating compensation or even the procedures should not mention the gender of the landowner, which is irrelevant information.</p> <p>In all cases, the RSPO complaints resolution mechanism must provide a clear and public timetable."</p>
383	4.3.2	<p>"A schedule of standard procedures should be published on the RSPO guidelines.</p> <p>The basis for calculating compensation or even the procedures should not mention the gender of the landowner, which is irrelevant information.</p> <p>In all cases, the RSPO complaints resolution mechanism must provide a clear and public timetable."</p>
384	4.3.2	<p>The basis for calculating compensation or even the procedures should not mention the gender of the landowner, which is irrelevant information.</p>

#	Indicator	Comment (English)
385	4.3.2	<p>"A schedule of standard procedures should be published on the RSPO guidelines.</p> <p>The basis for calculating compensation or even the procedures should not mention the gender of the landowner, which is irrelevant information.</p> <p>In all cases, the RSPO complaints resolution mechanism must provide a clear and public timetable."</p>
386	4.3.3	The basis for calculating compensation or even the procedures should not mention the gender of the landowner, which is irrelevant information.
387	4.3.3	4.3.3. This should also be made publicly available for monitoring wider stakeholder groups.
388	4.3.3	In indicator 4.3.3 The phrase "representative chosen" was proposed to be changed to "representative of landowners"
389	4.3.3	Changing the phrase "representative he chose" was changed to "representative of landowners"
390	4.3.3	Indicator 4.3.3 (c) Proposed to: The phrase "the representative he chose" was changed to "Representative of the Land Owner".
391	4.3.3	Proposed Indicator 4.3.3: Changing the phrase "the representative he chose" was changed to "Representative of the Land Owner"
392	4.3.3	<p>"Indicator 4.3.3 Proposed:</p> <p>Changing the phrase ""representative he chose"" was changed to ""representative of landowners""</p> <p>"</p>
393	4.3.3	<p>"Proposed indicator 4.3.3:</p> <p>Changing the phrase ""representative he chose"" was changed to ""representative of landowners""</p> <p>"</p>
394	4.3.3	Proposed changes in indicators 4.3.3: Changing the phrase "the representative he chose" was changed to "Representative of the Land Owner"
395	4.3.3	<p>"Comment:</p> <p>Changing the phrase ""representative he chose"" was changed to ""representative of landowners""</p> <p>Proposed changes:</p> <p>4.3.3 (c) Documenting the process and results of all agreements, compensation, and payments resulting from negotiations, complete with proof of the participation of the affected parties, and the documents referred to are available to the parties and representatives of landowners."</p>
396	4.3.3	<p>"[I] 4.3.3</p> <p>Changing the phrase ""representative he chose"" was changed to ""representative of landowners"""</p>
397	4.3.3	Indicator 4.3.3 (c) Proposed to: The phrase "the representative he chose" was changed to "Representative of the Land Owner".

#	Indicator	Comment (English)
398	4.3.3	Indicator 4.3.3 (c) Proposed to: The phrase "the representative he chose" was changed to "Representative of the Land Owner".
399	4.3.3	The indicator 4.3.3. It is already included in 4.2.8
400	4.3.4	4.3.4 What would be the appropriate compensation or opportunity? And who should determine whether it is enough? How do we audit something like this?
401	4.3.4	"in a language they understand"
402	4.3.4	Propose to reword : evidence is documented
403	4.3.4	in a language they understand
404	4.3.4	in a language they understand
405	4.3.4	in a language they understand
406	4.3.4	"In indicators 4.3.4 - the sentence changes are proposed to be ""available evidence that people who lose access and land rights to expand plantations are given the opportunity to benefit from plantation development"". - The phrase ""Planting and/or New Development"" was changed to ""New Planting including the Development of Supporting Infrastructure""
407	4.3.4	Proposal 4.3.4 The sentence "planting and/or new development" was changed to "new planting including the development of supporting infrastructure" so that changes: 4.3.4 to: available evidence that people who lose access and rights to land that exist new planting including the development of supporting infrastructure given the opportunity to benefit from the development of plantations ". Evidence of this process is documented and available for all people and stakeholders that are affected.
408	4.3.4	"- It is proposed to change sentences to ""available evidence that people who lose access and land rights for plantation expansion are given the opportunity to benefit from the development of plantations"". - The phrase ""Planting and/or New Development"" was changed to ""New Planting including the Development of Supporting Infrastructure""
409	4.3.4	Need to change indicators 4.3.4: Changes in sentences to "available evidence that people who lose access and land rights for plantation expansion are given the opportunity to benefit from plantation development". While the phrase "Planting and/or New Development" was changed to "new planting including the development of supporting infrastructure"
410	4.3.4	"[I] 4.3.4 - It is proposed to change sentences to ""available evidence that people who lose access and land rights for plantation expansion are given the opportunity to benefit from the development of plantations"". - The phrase ""Planting and/or New Development"" was changed to ""New Planting including the Development of Supporting Infrastructure""
411	4.3.4	4.3.4: Replacing the word "proof of the process" to "evidence of the results" because it is not auditable to document all the processes.

#	Indicator	Comment (English)
412	4.3.4	"Proposed indicator 4.3.4: - Changing sentences to ""available evidence that people who lose access and land rights to expand plantations are given the opportunity to benefit from plantation development"". - The phrase ""Planting and/or New Development"" was changed to ""New Planting including the Development of Supporting Infrastructure""
413	4.3.4	"Indicator 4.3.4 is proposed to: 1. The sentence is changed to ""available evidence that people who lose access and rights to land for plantation expansion are given the opportunity to benefit from plantation development"". 2. The phrase ""Planting and/or New Development"" was changed to ""New Planting including the development of supporting infrastructure""."
414	4.3.4	"Comment: The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure"" Proposed changes: 4.3.4 Evidence is available that people who lose access and rights to existing land including the development of supporting infrastructure are given the opportunity to benefit from the development of plantations "". Evidence of this process is documented and available to all communities and stakeholders affected. "
415	4.3.4	"Indicator 4.3.4 Proposed: - It is proposed to change sentences to ""available evidence that people who lose access and land rights for plantation expansion are given the opportunity to benefit from the development of plantations"". - The phrase ""Planting and/or New Development"" was changed to ""New Planting including the Development of Supporting Infrastructure""
416	4.3.4	Comment: The sentence "planting and/or new development" was changed to "new planting including the development of supporting infrastructure" proposed changes: 4.3.4 Available evidence that people who lose access and rights to existing land including the development of supporting infrastructure are given the opportunity to get Benefits of Plantation Development ". Evidence of this process is documented and available to all people and stakeholders affected.
417	4.3.4	Indicator 4.3.4 is proposed to: (1). The sentence was changed to "available evidence that people who lose access and land rights to expand plantations are given the opportunity to benefit from plantation development". (2). The phrase "Planting and/or New Development" was changed to "new planting including the development of supporting infrastructure".

#	Indicator	Comment (English)
418	4.4	Consultation and negotiation should be conducted in a culturally appropriate manner.
419	4.4	Consultation and negotiation should be conducted in a culturally appropriate manner.
420	4.4	Revise wording of 4.4 to clarify that this is the case of existing plantations. [There is confusion here. Why are they putting 'new plantings' here? Is there a reason?]
421	4.4	Consultation and negotiation should be conducted in a culturally appropriate manner.
422	4.4	"Consultation and negotiation should be conducted in a culturally appropriate manner. "
423	4.4.1	in all cases, the RSPO complaints resolution mechanism must provide a clear and public timeline.
424	4.4.1	4.4.1 Guidance should also be given if other processes are used. If other processes are used, what would be the minimum requirements by RSPO?
425	4.4.1	"in all cases, the RSPO complaints resolution mechanism must provide a clear and public timeline."
426	4.4.1	in all cases, the RSPO complaints resolution mechanism must provide a clear and public timeline.
427	4.4.1	4.4.1.in all cases, the RSPO complaints resolution mechanism must provide a clear and public timeline.
428	4.4.1	In indicators 4.4.1 can be: If there is a land conflict, then the process of resolving conflicts that can be received together as stipulated in the RSPO complaint system or dispute resolution facility
429	4.4.1	4.4.1 This indicator to focus on making a system/mechanism in the certification unit in handling land conflicts, so there is no need to include a complaint system or dispute resolution facility owned by RSPO.
430	4.4.1	"Proposal: Spending Indicator 4.4.1 Becomes: If there is a land conflict, then the process of resolving conflicts that can be received together as stipulated in the RSPO complaint system or dispute resolution facility"
431	4.4.1	Proposed changes: 4.4.1 (c) If there is a land conflict can be resolved through a mutually agreed process. This process is compiled, documented, and implemented in order to overcome disagreement with and between affected communities (including people whose land is seized or forced to leave their customary land or other utilization rights holders). Documented, provided, and understood steps to resolve conflicts for all stakeholders, affected communities, and their representatives.
432	4.4.1	"[I] 4.4.1 Spending Indicator 4.4.1 Becomes: If there is a land conflict, then the process of resolving conflicts that can be received together as stipulated in the RSPO complaint system or dispute resolution facility"
433	4.4.1	Proposed 4.4.1: Indicator Supporting 4.4.1 becomes: "If there is a land conflict, then the process of resolving conflicts that can be received together as stipulated in the RSPO complaint system or dispute resolution facility"
434	4.4.1	4.4.1: Indicator 4.4.1 is simplified to: "If there is a land conflict, then the process of resolving conflicts that can be received together as stipulated in the RSPO complaint system or dispute resolution facility"

#	Indicator	Comment (English)
435	4.4.1	Indicator 4.4.1 (c) Proposed in order to: Support Indicator 4.4.1 becomes "if there is land conflict, then the process of resolving conflicts that can be received together as regulated in the RSPO complaint system or dispute resolution facility".
436	4.4.1	"Proposed changes: 4.4.1 (c) If there is a land conflict can be resolved through a mutually agreed process. This process is compiled, documented, and implemented in order to overcome disagreement with and between affected communities (including people whose land is seized or forced to leave their customary land or other utilization rights holders). Documented, provided, and understood steps to resolve conflicts for all stakeholders, affected communities, and their representatives. "
437	4.4.1	"Proposal: Spending Indicator 4.4.1 Becomes: If there is a land conflict, then the process of resolving conflicts that can be received together as stipulated in the RSPO complaint system or dispute resolution facility"
438	4.4.1	Simplification of indicators 4.4.1 becomes: If there is a land conflict, then the process of resolving conflicts that can be received together as stipulated in the RSPO complaint system or dispute resolution facility
439	4.4.1	Supporting Indicator 4.4.1 Becomes: If there is a land conflict, the conflict resolution is carried out with a jointly acceptable process as stipulated in the RSPO complaint system or dispute resolution facility
440	4.4.1	Spending Indicator 4.4.1 Becomes: If there is a land conflict, then the process of resolving conflicts that can be received together as stipulated in the RSPO complaint system or dispute resolution facility
441	4.4.2	4.4.2 Information should be provided in the appropriate language.
442	4.4.2	"4.4.2. For any grievance resolution mechanism chosen, the RSPO must define a timeline according to the seriousness of the situation. All players must ensure that the grievance is resolved before the deadline."
443	4.4.2	Directly affected communities shall be represented through institutions or representatives of their own choosing. Vulnerable Groups shall be considered in the selection of representatives. This includes the option of access and provision of independent advice and legal counsel. For any grievance resolution mechanism chosen, the RSPO must define a timeline according to the seriousness of the situation All players must ensure that the grievance is resolved before the deadline.
444	4.4.2	"Directly affected communities shall be represented through institutions or representatives of their own choosing. Vulnerable Groups shall be considered in the selection of representatives. This includes the option of access and provision of independent advice and legal counsel. For any grievance resolution mechanism chosen, the RSPO must define a timeline according to the seriousness of the situation All players must ensure that the grievance is resolved before the deadline."
445	4.4.2	"For any grievance resolution mechanism chosen, the RSPO must define a timeline according to the seriousness of the situation All players must ensure that the grievance is resolved before the deadline."

#	Indicator	Comment (English)
446	4.4.2	Directly affected communities shall be represented through institutions or representatives of their own choosing. Vulnerable Groups shall be considered in the selection of representatives. This includes the option of access and provision of independent advice and legal counsel
447	4.4.2	4.4.2. Directly affected communities shall be represented through institutions or representatives of their own choosing. Vulnerable Groups shall be considered in the selection of representatives. This includes the option of access and provision of independent advice and legal counsel.
448	4.4.2	In indicators 4.4.2 it is proposed to be combined with 4.4.1 to "if there is a land conflict, then the process of resolving conflicts that can be received together as stipulated in the RSPO complaint system or dispute resolution facility"
449	4.4.2	"Indicator 4.4.2 Proposed change Indicator 4.4.2 combined with 4.4.1 becomes ""if there is a land conflict, then the process of resolving conflicts that can be received together as stipulated in the RSPO complaint system or dispute resolution facility"""
450	4.4.2	Indicator is proposed 4.4.2 combined with 4.4.1 to "if there is a land conflict, then the process of resolving conflicts that can be received together as regulated in the RSPO complaint system or dispute resolution facility"
451	4.4.2	Indicator is proposed 4.4.2 combined with 4.4.1 to "if there is a land conflict, then the process of resolving conflicts that can be received together as regulated in the RSPO complaint system or dispute resolution facility"
452	4.4.2	Indicator is proposed 4.4.2 combined with 4.4.1 to "if there is a land conflict, then the process of resolving conflicts that can be received together as regulated in the RSPO complaint system or dispute resolution facility"
453	4.4.2	"Comment: Indicator is proposed 4.4.2 combined with 4.4.1 because the repetition of sentence information about the conflict resolution system is understood by all related parties"
454	4.4.2	Indicator 4.4.2 should be combined with 4.4.1 With the sentence "If there is a land conflict, then the process of resolving conflicts that can be received together as stipulated in the RSPO complaint system or dispute resolution facility"
455	4.4.2	"[I] 4.2.2 Indicator is proposed 4.4.2 combined with 4.4.1 to ""if there is a land conflict, then the process of resolving conflicts that can be received together as regulated in the RSPO complaint system or dispute resolution facility"""
456	4.4.2	Proposed 4.4.2: Proposed indicators 4.4.2 combined with 4.4.1 to "if there is a land conflict, then the process of resolving conflicts that can be received together as regulated in the RSPO complaint system or dispute resolution facility"
457	4.4.2	Indicator is proposed 4.4.2 combined with 4.4.1 to "if there is a land conflict, then the process of resolving conflicts that can be received together as regulated in the RSPO complaint system or dispute resolution facility"

#	Indicator	Comment (English)
458	4.4.2	Indicator 4.4.2 (c) proposed so that the indicator 4.4.2 combined with 4.4.1 becomes "if there is land conflict, then the process of resolving conflicts that can be received together as regulated in the RSPO complaint system or dispute resolution facility"
459	4.4.2	4.4.2: The word "and" replaced with "or" "because not all people affected appoint their representatives, and if there are representatives, communication is carried out through these representatives, and if there are no representatives, communication is carried out directly to the affected community, namely the landowner.
460	4.4.2	"And the representative." replaced with "or representative" tap is not all representatives
461	4.4.3	b) The RSPO can also set up an assistance unit for populations affected by a case of grievance.
462	4.4.3	the system must also include a financial aid envelope to provide assistance to local populations.
463	4.4.3	the system must also include a financial aid envelope to provide assistance to local populations.
464	4.4.3	The RSPO can also set up an assistance unit for populations affected by a case of grievance.
465	4.4.3	"4.4.3.the system must also include a financial aid envelope to provide assistance to local populations. b) The RSPO can also set up an assistance unit for populations affected by a case of grievance."
466	4.4.3	... ; and... -> and/or
467	4.4.3	The RSPO can also set up an assistance unit for populations affected by a case of grievance.
468	4.4.3	the system must also include a financial aid envelope to provide assistance to local populations.
469	4.4.3	In indicator 4.4.3 for points c is removed because it is covered in points A and B
470	4.4.3	"Indicator 4.4.3 Proposed points C is removed because it has been covered in points A and B "
471	4.4.3	Indicator 4.4.3 Proposal: Points C is removed because it is covered in points A and B
472	4.4.3	"Indicator 4.4.3 Proposal: Points C is removed because it has been covered in points A and B"
473	4.4.3	"[I] 4.4.3 Proposed point C was removed because it was included in points A and B"
474	4.4.3	There needs to be a summary of indicators 4.4.3 by eliminating points C because it has been covered in points A and b.
475	4.4.3	"Proposal: Point C is removed because it has been covered in points A and B "
476	4.4.3	Indicator 4.4.3 is proposed in order to: Points C is removed because it has been covered in points A and b.
477	4.4.3	Proposed point C was removed because it was included in points A and B
478	4.4.3	Indicator 4.4.3 is proposed in order to: Points C is removed because it has been covered in points A and b.

#	Indicator	Comment (English)
479	4.4.3	Indicator 4.4.3 is proposed in order to: Points C is removed because it has been covered in points A and b.
480	4.4.3	4.4.3 Does not specify the way in which communities will have access to legal advice, who provides it? It should be as part of the management of the community and should not be given the company to preserve the principle of impartiality in the process.
481	4.4.4	4.4.4. (C). Photos taken in the field or by satellite should be preferred to leave no room for doubt and ensure that all stakeholders are in agreement.
482	4.4.4	Photos taken in the field or by satellite should be preferred to leave no room for doubt and ensure that all stakeholders are in agreement.
483	4.4.4	"Photos taken in the field or by satellite should be preferred to leave no room for doubt and ensure that all stakeholders are in agreement."
484	4.4.4	Photos taken in the field or by satellite should be preferred to leave no room for doubt and ensure that all stakeholders are in agreement.
485	4.4.4	In indicators 4.4.4 add sentences to "authorities according to the applicable national regulations"
486	4.4.4	"Indicator 4.4.4 Proposed: Add sentences to ""authorities according to the applicable national regulations"""
487	4.4.4	Proposed changes: 4.4.4 (c) For all conflicts or land disputes, participatory mapping must be carried out on the disputed area with the affected parties and the authorities according to the applicable national regulations, if any. See indicator 4.2.3 (c).
488	4.4.4	Proposed indicator 4.4.4 (c) Proposed to: There are additional sentences to "the authorities according to the applicable national regulations".
489	4.4.4	"[I] 4.4.4 Add sentences to ""authorities according to the applicable national regulations"""
490	4.4.4	Indicator 4.4.4 (c) Proposed to: There are additional sentences to "the authorities according to the applicable national regulations".
491	4.4.4	"Proposed changes: 4.4.4 (c) For all conflicts or land disputes, participatory mapping must be carried out on the area that is disputed with the affected parties and the authorities in accordance with the applicable national regulations, if any. See indicator 4.2.3 (c)."
492	4.4.4	Proposed to: There are additional sentences to "the authorities according to the applicable national regulations".
493	4.4.4	4.4.4: Need the definition of "who is the authorities" in participatory mapping.
494	4.4.4	Indicator 4.4.4 (c) Proposed to: There are additional sentences to "the authorities according to the applicable national regulations".
495	4.4.4	Indicator 4.4.4 (c) Proposed to: There are additional sentences to "the authorities according to the applicable national regulations".
496	4.4.4	Add sentences to "authorities according to the applicable national regulations"
497	4.4.4	Proposed indicator 4.4.4 (c): It is proposed that there is an additional sentence to "the authorities according to the applicable national regulations".

#	Indicator	Comment (English)
498	4.4.4	Add sentences to "authorities according to the applicable national regulations"
499	4.4.5	"In the case of grievances, the RSPO must accelerate administrative procedures for access to ownership rights. The RSPO must also propose a simplified administrative procedure for obtaining proof of land ownership."
500	4.4.5	"In the case of grievances, the RSPO must accelerate administrative procedures for access to ownership rights. The RSPO must also propose a simplified administrative procedure for obtaining proof of land ownership."
501	4.4.5	In the case of grievances, the RSPO must accelerate administrative procedures for access to ownership rights. The RSPO must also propose a simplified administrative procedure for obtaining proof of land ownership.
502	4.4.5	"4.4.5. In the case of grievances, the RSPO must accelerate administrative procedures for access to ownership rights. The RSPO must also propose a simplified administrative procedure for obtaining proof of land ownership." "
503	4.4.5	"In indicators 4.4.5 the sentence changes are proposed to: ""If there has been or a dispute has occurred, proof of land acquisition legally and proof of compensation as agreed by the parties have been given to all people who have legal rights, customary rights, or use rights when the land acquisition is carried out. The evidence is available and given to the parties involved in the dispute and that compensation has been received through the documented KBDD process ""."
504	4.4.5	Indicator 4.4.5 is proposed to: The sentence is changed to "if there has been or a dispute has occurred, proof of land acquisition legally and proof of compensation as agreed by the parties has been given to all people who have legal rights, customary rights, or use rights at When the land acquisition is carried out. The evidence is available and given to the parties involved in the dispute and that compensation has been received through the documented KBDD process ".
505	4.4.5	"Indicator 4.4.5 Proposed: The sentence changes will be proposed to: ""If there has been or a dispute, proof of land acquisition is legally and proof of compensation as agreed by the parties has been granted to all people who have legal rights, customary rights, or use rights at the time of land acquisition. The evidence is available and given to the parties involved in the dispute and that compensation has been received through the documented KBDD process ""."
506	4.4.5	"Indicator 4.4.5 Proposed changes: ""If there have been or disputes, proof of land acquisition legally and proof of compensation as agreed by parties have been given to all people who have legal rights, customary rights, or use rights at the time of land acquisition. Evidence- The evidence is available and given to the parties involved in the dispute and that compensation has been received through the documented KBDD process """"

#	Indicator	Comment (English)
507	4.4.5	"The sentence changes are proposed to be: ""If there has been a dispute or a dispute, proof of land acquisition legally and proof of compensation as agreed by the parties has been given to everyone who have legal rights, customary rights, or use rights when the land acquisition is carried out. The evidence is available and given to the parties involved in the dispute and that compensation has been received through the documented KBDD process ""."
508	4.4.5	In indicators 4.4.5 it is necessary to change sentences to: "If there has been or a dispute has occurred, proof of land acquisition legally and proof of compensation as agreed by parties have been given to all people who have legal rights, customary rights, or use rights At the time of land acquisition. The evidence is available and given to those involved in the dispute and that compensation has been received through the documented KBDD process ".
509	4.4.5	"Proposal 4.4.5: The sentence changes are proposed to be: ""If there has been a dispute or a dispute, proof of land acquisition legally and proof of compensation as agreed by the parties has been given to everyone who have legal rights, customary rights, or use rights when the land acquisition is carried out. The evidence is available and given to the parties involved in the dispute and that compensation has been received through the documented KBDD process ""."
510	4.4.5	In order to: the sentence is changed to "if there has been or a dispute has occurred, proof of land acquisition legally and proof of compensation as agreed by parties have been given to all people who have legal rights, customary rights, or use rights at the time of land acquisition . The evidence is available and given to the parties involved in the dispute and that compensation has been received through the documented KBDD process ".
511	4.4.5	"[I] 4.4.5 The sentence changes are proposed to be: ""If there has been a dispute or a dispute, proof of land acquisition legally and proof of compensation as agreed by the parties has been given to everyone who have legal rights, customary rights, or use rights when the land acquisition is carried out. The evidence is available and given to the parties involved in the dispute and that compensation has been received through the documented KBDD process ""."
512	4.4.5	"Indicator 4.4.5 Proposed to: The sentence is changed to ""if there has been or a dispute has occurred, proof of land acquisition legally and proof of giving compensation as agreed by the parties have been given to all people who have legal rights, customary rights, or use rights when the land acquisition is carried out. The evidence is available and given to the parties involved in the dispute and that compensation has been received through the documented KBDD process ""."

#	Indicator	Comment (English)
513	4.4.5	Change the sentence to: "If there is or a dispute has occurred, proof of land acquisition legally and proof of compensation as agreed by the parties has been given to all people who have legal rights, customary rights, or use rights at the time of land acquisition. -The evidence is available and given to the parties involved in the dispute and that compensation has been received through the documented KBDD process ".
514	4.4.5	"4.4.5: The indicator sentence becomes, ""If there have been or disputes, proof of land acquisition legally and proof of compensation as agreed by the parties have been given to all people who have legal rights, customary rights, or use rights at the time of land acquisition. The evidence is available and given to the parties involved in the dispute and that compensation has been received through the documented KBDD process ""."
515	4.4.5	"Change the sentence to: ""If there is or a dispute has occurred, proof of land acquisition legally and proof of compensation as agreed by the parties has been given to all people who have legal rights, customary rights, or use rights when the land acquisition is carried out. The evidence is available and given to the parties involved in the dispute and that compensation has been received through the documented KBDD process ""."
516	4.4.5	Define the terms to be able to carry out a CLPI in established operations before 2005, the term affected communities does not clearly determine the beginning of this process.
517	4.5	What is the difference with criteria 2.4? They both discuss the Grievance mechanism is similar ways.
518	4.5	All indicators contained in criteria 4.5 are already in indicator 2.4.1 (c), is it necessary to repeat them? ...
519	4.5.1	[HRSS] Propose to consolidate this with P2 - see HRSS proposed wordings in P2 on grievance mechanism which is to apply to p4, p5 and p6.
520	4.5.1	For indicators 4.5.1 it is proposed to add the phrase "as long as the report is supported by sufficient initial evidence"
521	4.5.1	The phrase added "as long as the report is supported by sufficient initial evidence"
522	4.5.1	Indicator 4.5.1 is proposed to: added the phrase "as long as the report is supported by sufficient initial evidence".
523	4.5.1	Indicator 4.5.1 is proposed to: added the phrase "as long as the report is supported by sufficient initial evidence".
524	4.5.1	The phrase added "as long as the report is supported by sufficient initial evidence"
525	4.5.1	"Indicator 4.5.1 Proposed: The phrase added ""as long as the report is supported by sufficient initial evidence"""
526	4.5.1	Proposed indicator 4.5.1 needs to be added by the phrase "as long as the report is supported by sufficient initial evidence"
527	4.5.1	"[I] 4.5.1 The phrase added ""as long as the report is supported by sufficient initial evidence"""
528	4.5.1	Indicator 4.5.1 is proposed to: added the phrase "as long as the report is supported by sufficient initial evidence".

#	Indicator	Comment (English)
529	4.5.1	It is suggested to change the term affected by impact.
530	4.5.2	"The RSPO must support growers and mills in understanding the FPIC process and its implementation in order to increase efficiency in the field and mitigate the future risk of grievances."
531	4.5.2	It is suggested to change the term affected by impact.
532	4.5.4	"Including an agreed time frame "
533	4.5.4	In indicators 4.5.4 it is proposed that the change to "the certification unit informs the development of complaints to the parties, including the agreed time frame, and the results are available and communicated to relevant stakeholders".
534	4.5.4	"Indicator 4.5.4 Proposed: It was proposed to change to ""The Certification Unit informed the development of complaints handling to the parties, including the agreed time frame, and the results were available and communicated to relevant stakeholders""."
535	4.5.4	"Indicator 4..5.4 Proposed change The certification unit informs the development of complaints handling to the parties, including the agreed time frame, and the results are available and communicated to relevant stakeholders ""."
536	4.5.4	Proposed Indicator 4.5.4: It should be changed to "The Certification Unit informs the development of complaints to the parties, including the agreed time frame, and the results are available and communicated to relevant stakeholders".
537	4.5.4	Proposed 4.5.4, Improvement of Indicators to "Certification Unit informs the development of complaints handling to the parties, including the agreed time frame, and the results are available and communicated to relevant stakeholders
538	4.5.4	"Proposed changes: 4.5.4 The certification unit informs the development of complaints handling to the parties, including the agreed time frame, and the results are available and communicated to relevant stakeholders ""."
539	4.5.4	Proposed change: 4.5.4 Certification Unit informs the development of complaints handling to the parties, including the agreed time frame, and the results are available and communicated to relevant stakeholders ".
540	4.5.4	It was proposed to change to "The Certification Unit informed the development of complaints handling to the parties, including the agreed time frame, and the results were available and communicated to relevant stakeholders".
541	4.5.4	Indicator 4.5.4 is proposed to: Change to "the certification unit informs the development of complaints to the parties, including the agreed time frame, and the results are available and communicated to relevant stakeholders".
542	4.5.4	Indicator 4.5.4 is proposed to: Change to "the certification unit informs the development of complaints to the parties, including the agreed time frame, and the results are available and communicated to relevant stakeholders".
543	4.5.4	It was proposed to change to "The Certification Unit informed the development of complaints handling to the parties, including the agreed time frame, and the results were available and communicated to relevant stakeholders".

#	Indicator	Comment (English)
544	4.5.4	This indicator is doubled in accordance with the provisions of indicator 2.4.1, 2.4.2
545	4.5.4	It must be focused on impacted or linked communities, and not to relevant interested parties since this indicator is addressed in principle 2 in the indicators of 2.4
546	4.5.4	This indicator is doubled in accordance with the provisions of indicator 2.4.1, 2.4.2, it is suggested to eliminate.
547	4.6.1	4.6.1 Is community development equal to sustainable development? There seems to a be disjunct between the criteria and indicator
548	4.6.1	4.6.1. A taskforce could be formed by the RSPO with a number of relevant stakeholders to try to identify and quantify contributions to community development.
549	4.6.1	"A taskforce could be formed by the RSPO with a number of relevant stakeholders to try to identify and quantify contributions to community development."
550	4.6.1	A taskforce could be formed by the RSPO with a number of relevant stakeholders to try to identify and quantify contributions to community development.
551	4.6.1	A taskforce could be formed by the RSPO with a number of relevant stakeholders to try to identify and quantify contributions to community development.
552	4.6.1	"Here is a confusion, these contributions are agreements as part of a CLPI? or in general, project support requests agreed with the communities. The auditors audit it as something general but not because it is associated with an agreement in a clip."

#	Indicator	Comment (English)
1	5.1	The notion of "fair" needs to be very clearly defined, with a panel of several relevant stakeholders, guidelines or even, precise criteria to ensure that smallholders and schemes not only receive genuine fairness in prices but also have a voice in negotiations with players - and to avoid random interpretation among mills.
2	5.1	The notion of "fair" needs to be very clearly defined, with a panel of several relevant stakeholders, guidelines or even, precise criteria to ensure that smallholders and schemes not only receive genuine fairness in prices but also have a voice in negotiations with players - and to avoid random interpretation among mills.
3	5.1	The notion of "fair" needs to be very clearly defined, with a panel of several relevant stakeholders, guidelines or even, precise criteria to ensure that smallholders and schemes not only receive genuine fairness in prices but also have a voice in negotiations with players - and to avoid random interpretation among mills.
4	5.1	The notion of "fair" needs to be very clearly defined, with a panel of several relevant stakeholders, guidelines or even, precise criteria to ensure that smallholders and schemes not only receive genuine fairness in prices but also have a voice in negotiations with players - and to avoid random interpretation among mills.
5	5.1	The notion of "fair" needs to be very clearly defined, with a panel of several relevant stakeholders, guidelines or even, precise criteria to ensure that smallholders and schemes not only receive genuine fairness in prices but also have a voice in negotiations with players - and to avoid random interpretation among mills.
6	5.1	The notion of "fair" needs to be very clearly defined, with a panel of several relevant stakeholders, guidelines or even, precise criteria to ensure that smallholders and schemes not only receive genuine fairness in prices but also have a voice in negotiations with players - and to avoid random interpretation among mills.
7	5.1	The notion of "fair" needs to be very clearly defined, with a panel of several relevant stakeholders, guidelines or even, precise criteria to ensure that smallholders and schemes not only receive genuine fairness in prices but also have a voice in negotiations with players - and to avoid random interpretation among mills.
8	5.1	The notion of "fair" needs to be very clearly defined, with a panel of several relevant stakeholders, guidelines or even, precise criteria to ensure that smallholders and schemes not only receive genuine fairness in prices but also have a voice in negotiations with players - and to avoid random interpretation among mills.
9	5.1	The notion of "fair" needs to be very clearly defined, with a panel of several relevant stakeholders, guidelines or even, precise criteria to ensure that smallholders and schemes not only receive genuine fairness in prices but also have a voice in negotiations with players - and to avoid random interpretation among mills.
10	5.1	The notion of "fair" needs to be very clearly defined, with a panel of several relevant stakeholders, guidelines or even, precise criteria to ensure that smallholders and schemes not only receive genuine fairness in prices but also have a voice in negotiations with players - and to avoid random interpretation among mills.

#	Indicator	Comment (English)
11	5.1	The notion of "fair" needs to be very clearly defined, with a panel of several relevant stakeholders, guidelines or even, precise criteria to ensure that smallholders and schemes not only receive genuine fairness in prices but also have a voice in negotiations with players - and to avoid random interpretation among mills.
12	5.1	The notion of "fair" needs to be very clearly defined, with a panel of several relevant stakeholders, guidelines or even, precise criteria to ensure that smallholders and schemes not only receive genuine fairness in prices but also have a voice in negotiations with players - and to avoid random interpretation among mills.
13	5.1.1	<p>"In the absence of government floor pricing, the National Interpretation will develop a procedure to calculate a fair price for FFB".</p> <p>RSPO will endeavour to ascertain the appropriate living wage benchmarks for palm oil-producing areas in which its members operate. Once the appropriate living wage benchmarks are available, the Unit of Certification (UoC) shall update their prevailing wage, identify living wage gap, develop a time-bound wage improvement plan and take measures to close the gap (if any). These studies shall be done by the end of 2023.</p> <p>While waiting for Living Wages benchmark, the National Interpretation shall use the production costs approach to calculate what is a fair price for FFB.</p> <ul style="list-style-type: none"> ● Fair Price paid to smallholders or medium growers of FFB are based on cost-calculation and cover, at a minimum, the costs of production - including labour, materials, overheads, and a margin ● Fair Price calculation methods should consider the costs associated to the production itself (when applicable: seedling, agricultural inputs, specific authorisations, fields rental, employed workforce, machinery costs - rental, new acquisition, maintenance, cost of transportation for goods or workforce, etc.) but also costs for implementing good agricultural practices, measures for conserving/restoring biodiversity; costs of training and awareness raising events; costs of technical support and internal audits. ● Cost calculations consider the average time spent by smallholders or medium growers, on cultivation related to the raw material, at a rate proportional at least to the national minimum wage. ● Cost calculations are periodically reviewed to reflect changes in cost of living (inflation, deflation, increase of minimum wages, etc.) <p>Guidelines should be proposed to provide simplified negotiation processes that are fair for the mills, but above all safe and understandable for smallholders and scheme members."</p>
14	5.1.1	"The price information in question is that determined by the government and can be accessed by all Planning (Swadaya and Plasma) TBS suppliers."

#	Indicator	Comment (English)
15	5.1.1	5.1.1: FFB price information in question is determined by the government and can be accessed by all planters (self -help and plasma) TBS suppliers.
16	5.1.2	Proposed Indicator Improvement 5.1.2 Becomes: The availability of evidence that the certification unit gives an explanation of the determination of TBS prices regularly to farmers.
17	5.1.3	<p>"In the absence of government floor pricing, the National Interpretation will develop a procedure to calculate a fair price for FFB".</p> <p>RSPO will endeavour to ascertain the appropriate living wage benchmarks for palm oil-producing areas in which its members operate. Once the appropriate living wage benchmarks are available, the Unit of Certification (UoC) shall update their prevailing wage, identify living wage gap, develop a time-bound wage improvement plan and take measures to close the gap (if any). These studies shall be done by the end of 2023.</p> <p>While waiting for Living Wages benchmark,the National Interpretation shall use the production costs approach to calculate what is a fair price for FFB.</p> <ul style="list-style-type: none"> ● Fair Price paid to smallholders or medium growers of FFB are based on cost-calculation and cover, at a minimum, the costs of production - including labour, materials, overheads, and a margin ● Fair Price calculation methods should consider the costs associated to the production itself (when applicable: seedling, agricultural inputs, specific authorisations, fields rental, employed workforce, machinery costs - rental, new acquisition, maintenance, cost of transportation for goods or workforce, etc.) but also costs for implementing good agricultural practices, measures for conserving/restoring biodiversity; costs of training and awareness raising events; costs of technical support and internal audits. ● Cost calculations consider the average time spent by smallholders or medium growers, on cultivation related to the raw material, at a rate proportional at least to the national minimum wage. ● Cost calculations are periodically reviewed to reflect changes in cost of living (inflation, deflation, increase of minimum wages, etc.) <p>Guidelines should be proposed to provide simplified negotiation processes that are fair for the mills, but above all safe and understandable for smallholders and scheme members.</p> <p>The process must be proposed by the RSPO and a panel of relevant stakeholders to ensure that it is both fair and understandable to all smallholders.</p> <p>Audits could be set up, with public disclosure of FFB prices, to guarantee compliance with the process and its transparency."</p>

#	Indicator	Comment (English)
18	5.1.3	RSPO will endeavour to ascertain the appropriate living wage benchmarks for palm oil-producing areas in which its members operate. Once the appropriate living wage benchmarks are available, the Unit of Certification (UoC) shall update their prevailing wage, identify living wage gap, develop a time-bound wage improvement plan and take measures to close the gap (if any). These studies shall be done by the end of 2023.
19	5.1.3	"Welcome that the NI will develop a procedure to calculate a fair price for FFB in the absence of government floor pricing [For National Interpretation: National Interpretation will include information on national pricing mechanism. In the absence of government floor pricing, the National Interpretation will develop a procedure to calculate a fair price for FFB]. "

#	Indicator	Comment (English)
20	5.1.3	<p>"In the absence of government floor pricing, the National Interpretation will develop a procedure to calculate a fair price for FFB"".</p> <p>RSPO will endeavour to ascertain the appropriate living wage benchmarks for palm oil-producing areas in which its members operate. Once the appropriate living wage benchmarks are available, the Unit of Certification (UoC) shall update their prevailing wage, identify living wage gap, develop a time-bound wage improvement plan and take measures to close the gap (if any). These studies shall be done by the end of 2023.</p> <p>While waiting for Living Wages benchmark,the National Interpretation shall use the production costs approach to calculate what is a fair price for FFB.</p> <ul style="list-style-type: none"> ● Fair Price paid to smallholders or medium growers of FFB are based on cost-calculation and cover, at a minimum, the costs of production - including labour, materials, overheads, and a margin ● Fair Price calculation methods should consider the costs associated to the production itself (when applicable: seedling, agricultural inputs, specific authorisations, fields rental, employed workforce, machinery costs - rental, new acquisition, maintenance, cost of transportation for goods or workforce, etc.) but also costs for implementing good agricultural practices, measures for conserving/restoring biodiversity; costs of training and awareness raising events; costs of technical support and internal audits. ● Cost calculations consider the average time spent by smallholders or medium growers, on cultivation related to the raw material, at a rate proportional at least to the national minimum wage. ● Cost calculations are periodically reviewed to reflect changes in cost of living (inflation, deflation, increase of minimum wages, etc.) <p>Guidelines should be proposed to provide simplified negotiation processes that are fair for the mills, but above all safe and understandable for smallholders and scheme members.</p> <p>The process must be proposed by the RSPO and a panel of relevant stakeholders to ensure that it is both fair and understandable to all smallholders.</p> <p>Audits could be set up, with public disclosure of FFB prices, to guarantee compliance with the process and its transparency."</p>
21	5.1.3	<p>"5.1.3.(C) In the absence of government floor pricing, the National Interpretation will develop a procedure to calculate a fair price for FFB"".</p> <p>RSPO will endeavour to ascertain the appropriate living wage benchmarks for palm oil-producing areas in which its members operate. Once the appropriate living wage benchmarks are available, the Unit of Certification (UoC) shall update their prevailing wage, identify living wage gap, develop a time-bound wage improvement plan and take measures to close the gap (if any). These studies shall be done by the end of 2023."</p>

#	Indicator	Comment (English)
22	5.1.3	<p>"5.1.3 (C) For National Interpretation : While waiting for Living Wages benchmark,the National Interpretation shall use the production costs approach to calculate what is a fair price for FFB.</p> <ul style="list-style-type: none"> ● Fair Price paid to smallholders or medium growers of FFB are based on cost-calculation and cover, at a minimum, the costs of production - including labour, materials, overheads, and a margin ● Fair Price calculation methods should consider the costs associated to the production itself (when applicable: seedling, agricultural inputs, specific authorisations, fields rental, employed workforce, machinery costs - rental, new acquisition, maintenance, cost of transportation for goods or workforce, etc.) but also costs for implementing good agricultural practices, measures for conserving/restoring biodiversity; costs of training and awareness raising events; costs of technical support and internal audits. ● Cost calculations consider the average time spent by smallholders or medium growers, on cultivation related to the raw material, at a rate proportional at least to the national minimum wage. ● Cost calculations are periodically reviewed to reflect changes in cost of living (inflation, deflation, increase of minimum wages, etc.) <p>"</p>

#	Indicator	Comment (English)
23	5.1.3	<p data-bbox="367 209 2018 240">"In the absence of government floor pricing, the National Interpretation will develop a procedure to calculate a fair price for FFB".</p> <p data-bbox="367 284 2051 432">RSPO will endeavour to ascertain the appropriate living wage benchmarks for palm oil-producing areas in which its members operate. Once the appropriate living wage benchmarks are available, the Unit of Certification (UoC) shall update their prevailing wage, identify living wage gap, develop a time-bound wage improvement plan and take measures to close the gap (if any). These studies shall be done by the end of 2023.</p> <p data-bbox="367 475 2033 544">While waiting for Living Wages benchmark, the National Interpretation shall use the production costs approach to calculate what is a fair price for FFB.</p> <ul data-bbox="367 555 2051 943" style="list-style-type: none"> <li data-bbox="367 555 2002 624">● Fair Price paid to smallholders or medium growers of FFB are based on cost-calculation and cover, at a minimum, the costs of production - including labour, materials, overheads, and a margin <li data-bbox="367 639 2051 788">● Fair Price calculation methods should consider the costs associated to the production itself (when applicable: seedling, agricultural inputs, specific authorisations, fields rental, employed workforce, machinery costs - rental, new acquisition, maintenance, cost of transportation for goods or workforce, etc.) but also costs for implementing good agricultural practices, measures for conserving/restoring biodiversity; costs of training and awareness raising events; costs of technical support and internal audits. <li data-bbox="367 799 2051 868">● Cost calculations consider the average time spent by smallholders or medium growers, on cultivation related to the raw material, at a rate proportional at least to the national minimum wage. <li data-bbox="367 879 2018 943">● Cost calculations are periodically reviewed to reflect changes in cost of living (inflation, deflation, increase of minimum wages, etc.)"

#	Indicator	Comment (English)
24	5.1.3	<p>n the absence of government floor pricing, the National Interpretation will develop a procedure to calculate a fair price for FFB". RSPO will endeavour to ascertain the appropriate living wage benchmarks for palm oil-producing areas in which its members operate. Once the appropriate living wage benchmarks are available, the Unit of Certification (UoC) shall update their prevailing wage, identify living wage gap, develop a time-bound wage improvement plan and take measures to close the gap (if any). These studies shall be done by the end of 2023. While waiting for Living Wages benchmark,the National Interpretation shall use the production costs approach to calculate what is a fair price for FFB. ● Fair Price paid to smallholders or medium growers of FFB are based on cost-calculation and cover, at a minimum, the costs of production - including labour, materials, overheads, and a margin ● Fair Price calculation methods should consider the costs associated to the production itself (when applicable: seedling, agricultural inputs, specific authorisations, fields rental, employed workforce, machinery costs - rental, new acquisition, maintenance, cost of transportation for goods or workforce, etc.) but also costs for implementing good agricultural practices, measures for conserving/restoring biodiversity; costs of training and awareness raising events; costs of technical support and internal audits. ● Cost calculations consider the average time spent by smallholders or medium growers, on cultivation related to the raw material, at a rate proportional at least to the national minimum wage. ● Cost calculations are periodically reviewed to reflect changes in cost of living (inflation, deflation, increase of minimum wages, etc.)</p>
25	5.1.3	<p>In the absence of government floor pricing, the National Interpretation will develop a procedure to calculate a fair price for FFB". RSPO will endeavour to ascertain the appropriate living wage benchmarks for palm oil-producing areas in which its members operate. Once the appropriate living wage benchmarks are available, the Unit of Certification (UoC) shall update their prevailing wage, identify living wage gap, develop a time-bound wage improvement plan and take measures to close the gap (if any). These studies shall be done by the end of 2023. While waiting for Living Wages benchmark,the National Interpretation shall use the production costs approach to calculate what is a fair price for FFB. ● Fair Price paid to smallholders or medium growers of FFB are based on cost-calculation and cover, at a minimum, the costs of production - including labour, materials, overheads, and a margin ● Fair Price calculation methods should consider the costs associated to the production itself (when applicable: seedling, agricultural inputs, specific authorisations, fields rental, employed workforce, machinery costs - rental, new acquisition, maintenance, cost of transportation for goods or workforce, etc.) but also costs for implementing good agricultural practices, measures for conserving/restoring biodiversity; costs of training and awareness raising events; costs of technical support and internal audits. ● Cost calculations consider the average time spent by smallholders or medium growers, on cultivation related to the raw material, at a rate proportional at least to the national minimum wage. ● Cost calculations are periodically reviewed to reflect changes in cost of living (inflation, deflation, increase of minimum wages, etc.)</p>

#	Indicator	Comment (English)
26	5.1.3	<p>"In the absence of government floor pricing, the National Interpretation will develop a procedure to calculate a fair price for FFB"".</p> <p>RSPO will endeavour to ascertain the appropriate living wage benchmarks for palm oil-producing areas in which its members operate. Once the appropriate living wage benchmarks are available, the Unit of Certification (UoC) shall update their prevailing wage, identify living wage gap, develop a time-bound wage improvement plan and take measures to close the gap (if any). These studies shall be done by the end of 2023.</p> <p>While waiting for Living Wages benchmark,the National Interpretation shall use the production costs approach to calculate what is a fair price for FFB.</p> <ul style="list-style-type: none"> ● Fair Price paid to smallholders or medium growers of FFB are based on cost-calculation and cover, at a minimum, the costs of production - including labour, materials, overheads, and a margin ● Fair Price calculation methods should consider the costs associated to the production itself (when applicable: seedling, agricultural inputs, specific authorisations, fields rental, employed workforce, machinery costs - rental, new acquisition, maintenance, cost of transportation for goods or workforce, etc.) but also costs for implementing good agricultural practices, measures for conserving/restoring biodiversity; costs of training and awareness raising events; costs of technical support and internal audits. ● Cost calculations consider the average time spent by smallholders or medium growers, on cultivation related to the raw material, at a rate proportional at least to the national minimum wage. ● Cost calculations are periodically reviewed to reflect changes in cost of living (inflation, deflation, increase of minimum wages, etc.) <p>Guidelines should be proposed to provide simplified negotiation processes that are fair for the mills, but above all safe and understandable for smallholders and scheme members.</p> <p>The process must be proposed by the RSPO and a panel of relevant stakeholders to ensure that it is both fair and understandable to all smallholders.</p> <p>Audits could be set up, with public disclosure of FFB prices, to guarantee compliance with the process and its transparency."</p>
27	5.1.3	<p>In the absence of government floor pricing, the National Interpretation will develop a procedure to calculate a fair price for FFB".</p>

#	Indicator	Comment (English)
28	5.1.3	<p>"In the absence of government floor pricing, the National Interpretation will develop a procedure to calculate a fair price for FFB"".</p> <p>RSPO will endeavour to ascertain the appropriate living wage benchmarks for palm oil-producing areas in which its members operate. Once the appropriate living wage benchmarks are available, the Unit of Certification (UoC) shall update their prevailing wage, identify living wage gap, develop a time-bound wage improvement plan and take measures to close the gap (if any). These studies shall be done by the end of 2023.</p> <p>While waiting for Living Wages benchmark,the National Interpretation shall use the production costs approach to calculate what is a fair price for FFB.</p> <ul style="list-style-type: none"> ● Fair Price paid to smallholders or medium growers of FFB are based on cost-calculation and cover, at a minimum, the costs of production - including labour, materials, overheads, and a margin ● Fair Price calculation methods should consider the costs associated to the production itself (when applicable: seedling, agricultural inputs, specific authorisations, fields rental, employed workforce, machinery costs - rental, new acquisition, maintenance, cost of transportation for goods or workforce, etc.) but also costs for implementing good agricultural practices, measures for conserving/restoring biodiversity; costs of training and awareness raising events; costs of technical support and internal audits. ● Cost calculations consider the average time spent by smallholders or medium growers, on cultivation related to the raw material, at a rate proportional at least to the national minimum wage. ● Cost calculations are periodically reviewed to reflect changes in cost of living (inflation, deflation, increase of minimum wages, etc.) <p>Guidelines should be proposed to provide simplified negotiation processes that are fair for the mills, but above all safe and understandable for smallholders and scheme members.</p> <p>The process must be proposed by the RSPO and a panel of relevant stakeholders to ensure that it is both fair and understandable to all smallholders.</p> <p>Audits could be set up, with public disclosure of FFB prices, to guarantee compliance with the process and its transparency."</p>

#	Indicator	Comment (English)
29	5.1.3	<p>"In the absence of government floor pricing, the National Interpretation will develop a procedure to calculate a fair price for FFB"".</p> <p>RSPO will endeavour to ascertain the appropriate living wage benchmarks for palm oil-producing areas in which its members operate. Once the appropriate living wage benchmarks are available, the Unit of Certification (UoC) shall update their prevailing wage, identify living wage gap, develop a time-bound wage improvement plan and take measures to close the gap (if any). These studies shall be done by the end of 2023.</p> <p>While waiting for Living Wages benchmark,the National Interpretation shall use the production costs approach to calculate what is a fair price for FFB.</p> <ul style="list-style-type: none"> ● Fair Price paid to smallholders or medium growers of FFB are based on cost-calculation and cover, at a minimum, the costs of production - including labour, materials, overheads, and a margin ● Fair Price calculation methods should consider the costs associated to the production itself (when applicable: seedling, agricultural inputs, specific authorisations, fields rental, employed workforce, machinery costs - rental, new acquisition, maintenance, cost of transportation for goods or workforce, etc.) but also costs for implementing good agricultural practices, measures for conserving/restoring biodiversity; costs of training and awareness raising events; costs of technical support and internal audits. ● Cost calculations consider the average time spent by smallholders or medium growers, on cultivation related to the raw material, at a rate proportional at least to the national minimum wage. ● Cost calculations are periodically reviewed to reflect changes in cost of living (inflation, deflation, increase of minimum wages, etc.) <p>Guidelines should be proposed to provide simplified negotiation processes that are fair for the mills, but above all safe and understandable for smallholders and scheme members.</p> <p>The process must be proposed by the RSPO and a panel of relevant stakeholders to ensure that it is both fair and understandable to all smallholders.</p> <p>Audits could be set up, with public disclosure of FFB prices, to guarantee compliance with the process and its transparency."</p>

#	Indicator	Comment (English)
30	5.1.3	<p>"In the absence of government floor pricing, the National Interpretation will develop a procedure to calculate a fair price for FFB"". RSPO will endeavour to ascertain the appropriate living wage benchmarks for palm oil-producing areas in which its members operate. Once the appropriate living wage benchmarks are available, the Unit of Certification (UoC) shall update their prevailing wage, identify living wage gap, develop a time-bound wage improvement plan and take measures to close the gap (if any). These studies shall be done by the end of 2023.</p> <p>While waiting for Living Wages benchmark, the National Interpretation shall use the production costs approach to calculate what is a fair price for FFB.</p> <ul style="list-style-type: none"> ● Fair Price paid to smallholders or medium growers of FFB are based on cost-calculation and cover, at a minimum, the costs of production - including labour, materials, overheads, and a margin ● Fair Price calculation methods should consider the costs associated to the production itself (when applicable: seedling, agricultural inputs, specific authorisations, fields rental, employed workforce, machinery costs - rental, new acquisition, maintenance, cost of transportation for goods or workforce, etc.) but also costs for implementing good agricultural practices, measures for conserving/restoring biodiversity; costs of training and awareness raising events; costs of technical support and internal audits. ● Cost calculations consider the average time spent by smallholders or medium growers, on cultivation related to the raw material, at a rate proportional at least to the national minimum wage. ● Cost calculations are periodically reviewed to reflect changes in cost of living (inflation, deflation, increase of minimum wages, etc.) <p>Guidelines should be proposed to provide simplified negotiation processes that are fair for the mills, but above all safe and understandable for smallholders and scheme members.</p> <p>The process must be proposed by the RSPO and a panel of relevant stakeholders to ensure that it is both fair and understandable to all smallholders.</p> <p>Audits could be set up, with public disclosure of FFB prices, to guarantee compliance with the process and its transparency."</p>

#	Indicator	Comment (English)
31	5.1.3	<p>"While waiting for Living Wages benchmark,the National Interpretation shall use the production costs approach to calculate what is a fair price for FFB.</p> <ul style="list-style-type: none"> ● Fair Price paid to smallholders or medium growers of FFB are based on cost-calculation and cover, at a minimum, the costs of production - including labour, materials, overheads, and a margin ● Fair Price calculation methods should consider the costs associated to the production itself (when applicable: seedling, agricultural inputs, specific authorisations, fields rental, employed workforce, machinery costs - rental, new acquisition, maintenance, cost of transportation for goods or workforce, etc.) but also costs for implementing good agricultural practices, measures for conserving/restoring biodiversity; costs of training and awareness raising events; costs of technical support and internal audits. ● Cost calculations consider the average time spent by smallholders or medium growers, on cultivation related to the raw material, at a rate proportional at least to the national minimum wage. ● Cost calculations are periodically reviewed to reflect changes in cost of living (inflation, deflation, increase of minimum wages, etc.) <p>"</p>

#	Indicator	Comment (English)
32	5.1.3	<p>"In the absence of government floor pricing, the National Interpretation will develop a procedure to calculate a fair price for FFB".</p> <p>RSPO will endeavour to ascertain the appropriate living wage benchmarks for palm oil-producing areas in which its members operate. Once the appropriate living wage benchmarks are available, the Unit of Certification (UoC) shall update their prevailing wage, identify living wage gap, develop a time-bound wage improvement plan and take measures to close the gap (if any). These studies shall be done by the end of 2023.</p> <p>While waiting for Living Wages benchmark, the National Interpretation shall use the production costs approach to calculate what is a fair price for FFB.</p> <ul style="list-style-type: none"> ● Fair Price paid to smallholders or medium growers of FFB are based on cost-calculation and cover, at a minimum, the costs of production - including labour, materials, overheads, and a margin ● Fair Price calculation methods should consider the costs associated to the production itself (when applicable: seedling, agricultural inputs, specific authorisations, fields rental, employed workforce, machinery costs - rental, new acquisition, maintenance, cost of transportation for goods or workforce, etc.) but also costs for implementing good agricultural practices, measures for conserving/restoring biodiversity; costs of training and awareness raising events; costs of technical support and internal audits. ● Cost calculations consider the average time spent by smallholders or medium growers, on cultivation related to the raw material, at a rate proportional at least to the national minimum wage. ● Cost calculations are periodically reviewed to reflect changes in cost of living (inflation, deflation, increase of minimum wages, etc.) <p>Guidelines should be proposed to provide simplified negotiation processes that are fair for the mills, but above all safe and understandable for smallholders and scheme members.</p> <p>The process must be proposed by the RSPO and a panel of relevant stakeholders to ensure that it is both fair and understandable to all smallholders.</p> <p>Audits could be set up, with public disclosure of FFB prices, to guarantee compliance with the process and its transparency."</p>
33	5.1.3	<p>Why is 'Fair pricing' changed to 'the fair or competitive pricing'? Dealing fairly and transparently with all smallholders requires that a fair price is paid. The wording 'fair OR competitive pricing' could give the impression that it is ok to not pay a fair price.</p>
34	5.1.3	<p>"5.1.3 In order to add the words ""if any"" to the sentence ""Determine the Fair or Competitive Prices (including Premium Prices if any)""</p> <p>The pricing mechanism owned by the company is already something standard."</p>

#	Indicator	Comment (English)
35	5.1.3	"On indicators 5.1.3 Fair pricing, including determining the value of premiums, if any, agreed with farmers suppliers, and documented (the same as indicator 5.1.3 RSPO P&C 2018)"
36	5.1.3	"Indicator 5.1.3 Proposed: Determination of fair prices, including determining the value of premiums, if any, agreed upon with supplier farmers, and documented (the same as the indicator 5.1.3 RSPO P&C 2018) "
37	5.1.3	"The phrase ""including premium prices"" was deleted because The definition of premium prices has not been established, and there is no premium price benchmark that can be used as a reference. In addition, the provision of incentives for suppliers FFB can be in the form of other forms besides the price of FFB for example Technical assistance, fertilizer supply assistance, and others."
38	5.1.3	"For the current FFB price based on for the authority of Disbun and representatives of oil palm companies In each province, and is not regulated nationally."
39	5.1.3	Proposed Improvement of Indicators 5.1.3 Returns to the 2018 RSPO PNC Indicator, "Fair price determination, including determining the value of premiums, if any, agreed upon with supplier farmers, and documented" "
40	5.1.3	Indicator 5.1.3 (c) is proposed to: For national interpretation, the current TBS prices are based on the authority of Disbun and representatives of oil palm companies in each province is not regulated nationally.
41	5.1.3	Proposed Indicator 5.1.3 (c): For national interpretation, the current FFB price is based on the authority of Disbun and representatives of oil palm companies in each province is not regulated nationally.
42	5.1.3	"Proposed Indicator 5.1.3 Returns to the 2018 RSPO PNC indicator, fair price determination, including determining the value of premiums, if any, agreed with the farmers supplier, and documented"
43	5.1.3	"Indicator 5.1.3 (c) Proposed for: Fair price determination, including determining the value of premiums, if any, agreed with farmers suppliers, and documented (the same as the indicator 5.1.3 RSPO P&C 2018)."
44	5.1.3	For the current FFB price based on the authority of Disbun and representatives of oil palm companies in each province is not regulated nationally
45	5.1.3	5.1.3: The phrase "including premium prices" is removed because the definition of premium prices has not been determined, and there is no benchmark for premium prices that can be used as a reference. In addition, the provision of incentives for FFB suppliers can be in the form of other forms besides the price of FFB such as technical assistance, fertilizer supply assistance, and others.

#	Indicator	Comment (English)
46	5.1.3	Indicator 5.1.3 (c) is proposed to: For national interpretation, the current TBS prices are based on the authority of Disbun and representatives of oil palm companies in each province is not regulated nationally.
47	5.1.3	"Proposed changes: 5.1.3 (c) The certification unit must determine the fair price including premium prices if there is, through an agreement with the supplier of FFB. The agreed price must be documented."
48	5.1.3	Proposed 5.1.3: Indicators are changed to "Fair Prices, including determining the value of premiums, if any, agreed with suppliers, and documented" (equal to indicators 5.1.3 RSPO P&C 2018)
49	5.1.3	The indicators are changed to "Fair Prices, including determining the value of premiums, if any, agreed upon with supplier farmers, and documented" (the same as the indicator 5.1.3 RSPO P&C 2018)
50	5.1.3	"Proposed Indicator 5.1.3: Fair price determination, including determining the value of premiums, if any, agreed with farmers suppliers, and documented (the same as indicator 5.1.3 RSPO P&C 2018) "
51	5.1.3	"Fair price determination, including determining the value of premiums, if any, agreed with farmers suppliers, and documented (the same as indicator 5.1.3 RSPO P&C 2018)"
52	5.1.3	5.1.3: For the current price of FFB based on the authority of Disbun and representatives of oil palm companies in each province, and is not regulated nationally.
53	5.1.4	5.1.4. Guidelines should be proposed to provide simplified negotiation processes that are fair for the mills, but above all safe and understandable for smallholders and scheme members.
54	5.1.4	"Guidelines should be proposed to provide simplified negotiation processes that are fair for the mills, but above all safe and understandable for smallholders and scheme members."
55	5.1.4	Guidelines should be proposed to provide simplified negotiation processes that are fair for the mills, but above all safe and understandable for smallholders and scheme members.
56	5.1.4	Guidelines should be proposed to provide simplified negotiation processes that are fair for the mills, but above all safe and understandable for smallholders and scheme members.
57	5.1.4	This indicator is related to plasma/partnership cooperation.
58	5.1.4	5.1.4: This indicator is related to plasma/partnership cooperation.
59	5.1.5	"The process must be proposed by the RSPO and a panel of relevant stakeholders to ensure that it is both fair and understandable to all smallholders. Audits could be set up, with public disclosure of FFB prices, to guarantee compliance with the process and its transparency."

#	Indicator	Comment (English)
60	5.1.5	"5.1.5. The process must be proposed by the RSPO and a panel of relevant stakeholders to ensure that it is both fair and understandable to all smallholders. Audits could be set up, with public disclosure of FFB prices, to guarantee compliance with the process and its transparency."
61	5.1.5	"The process must be proposed by the RSPO and a panel of relevant stakeholders to ensure that it is both fair and understandable to all smallholders. Audits could be set up, with public disclosure of FFB prices, to guarantee compliance with the process and its transparency."
62	5.1.5	The process must be proposed by the RSPO and a panel of relevant stakeholders to ensure that it is both fair and understandable to all smallholders. Audits could be set up, with public disclosure of FFB prices, to guarantee compliance with the process and its transparency.
63	5.2	Mills must be required to meet the % of certified FFB, which they must purchase, at the right price, and which is made available by smallholders or scheme. If necessary, the certification unit must prove its inability to purchase certified volumes from smallholders at the premium price.
64	5.2	Mills must be required to meet the % of certified FFB, which they must purchase, at the right price, and which is made available by smallholders or scheme. If necessary, the certification unit must prove its inability to purchase certified volumes from smallholders at the premium price.
65	5.2	Mills must be required to meet the % of certified FFB, which they must purchase, at the right price, and which is made available by smallholders or scheme. If necessary, the certification unit must prove its inability to purchase certified volumes from smallholders at the premium price.
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67	5.2	Mills must be required to meet the % of certified FFB, which they must purchase, at the right price, and which is made available by smallholders or scheme. If necessary, the certification unit must prove its inability to purchase certified volumes from smallholders at the premium price.
68	5.2	Mills must be required to meet the % of certified FFB, which they must purchase, at the right price, and which is made available by smallholders or scheme. If necessary, the certification unit must prove its inability to purchase certified volumes from smallholders at the premium price.
69	5.2	Mills must be required to meet the % of certified FFB, which they must purchase, at the right price, and which is made available by smallholders or scheme. If necessary, the certification unit must prove its inability to purchase certified volumes from smallholders at the premium price.

#	Indicator	Comment (English)
70	5.2	Mills must be required to meet the % of certified FFB, which they must purchase, at the right price, and which is made available by smallholders or scheme. If necessary, the certification unit must prove its inability to purchase certified volumes from smallholders at the premium price.
71	5.2	Mills must be required to meet the % of certified FFB, which they must purchase, at the right price, and which is made available by smallholders or scheme. If necessary, the certification unit must prove its inability to purchase certified volumes from smallholders at the premium price.
72	5.2	Mills must be required to meet the % of certified FFB, which they must purchase, at the right price, and which is made available by smallholders or scheme. If necessary, the certification unit must prove its inability to purchase certified volumes from smallholders at the premium price.
73	5.2	Mills must be required to meet the % of certified FFB, which they must purchase, at the right price, and which is made available by smallholders or scheme. If necessary, the certification unit must prove its inability to purchase certified volumes from smallholders at the premium price.
74	5.2	Mills must be required to meet the % of certified FFB, which they must purchase, at the right price, and which is made available by smallholders or scheme. If necessary, the certification unit must prove its inability to purchase certified volumes from smallholders at the premium price.
75	5.2.1	"In localities, mills must set up mechanisms with local governments to accelerate or assist smallholders. RSPO must work with governments to facilitate these procedures and help mills operationally to be compliant with P&C. Thresholds should be published to compare the progress reported by mills. Quantitative and qualitative targets, with an associated timeline, should be published to ensure that actions are progressing in the right direction."
76	5.2.1	"In localities, mills must set up mechanisms with local governments to accelerate or assist smallholders. RSPO must work with governments to facilitate these procedures and help mills operationally to be compliant with P&C. Thresholds should be published to compare the progress reported by mills. Quantitative and qualitative targets, with an associated timeline, should be published to ensure that actions are progressing in the right direction."
77	5.2.1	Guidelines need to be put in place to provide smallholders with a legal framework and/or support to establish this dialogue with mills. These guidelines should consider the type of player, the economic situation of the area, the geographical location and the volumes involved (non-exhaustive list). This will also help the mill to see how it can provide operational support to smallholders.

#	Indicator	Comment (English)
78	5.2.1	"In localities, mills must set up mechanisms with local governments to accelerate or assist smallholders. RSPO must work with governments to facilitate these procedures and help mills operationally to be compliant with P&C. Thresholds should be published to compare the progress reported by mills. Quantitative and qualitative targets, with an associated timeline, should be published to ensure that actions are progressing in the right direction."
79	5.2.1	"Guidelines need to be put in place to provide smallholders with a legal framework and/or support to establish this dialogue with mills. These guidelines should consider the type of player, the economic situation of the area, the geographical location and the volumes involved (non-exhaustive list). This will also help the mill to see how it can provide operational support to smallholders."
80	5.2.1	"5.2.1. Guidelines need to be put in place to provide smallholders with a legal framework and/or support to establish this dialogue with mills. These guidelines should consider the type of player, the economic situation of the area, the geographical location and the volumes involved (non-exhaustive list). This will also help the mill to see how it can provide operational support to smallholders."
81	5.2.1	"In localities, mills must set up mechanisms with local governments to accelerate or assist smallholders. RSPO must work with governments to facilitate these procedures and help mills operationally to be compliant with P&C. Thresholds should be published to compare the progress reported by mills. Quantitative and qualitative targets, with an associated timeline, should be published to ensure that actions are progressing in the right direction."
82	5.2.1	"In localities, mills must set up mechanisms with local governments to accelerate or assist smallholders. RSPO must work with governments to facilitate these procedures and help mills operationally to be compliant with P&C. Thresholds should be published to compare the progress reported by mills. Quantitative and qualitative targets, with an associated timeline, should be published to ensure that actions are progressing in the right direction."
83	5.2.1	"Guidelines need to be put in place to provide smallholders with a legal framework and/or support to establish this dialogue with mills. These guidelines should consider the type of player, the economic situation of the area, the geographical location and the volumes involved (non-exhaustive list)."
84	5.2.1	What is the reason for no longer explicitly referring to 'including women' in indicator 5.2.1? As a marginalized group, it is important to make explicit that female smallholders should be supported. This is also important if RSPO is benchmarked on the inclusion of women's rights in the standard.

#	Indicator	Comment (English)
85	5.2.1	"5.2.1 Changing the word planter to an independent farmer (independent smallholder) Consideration: This indicator is more relevant for planters with the status of independent farmers (independent smallholder), while planters with plasma status (Schemed Smallholder) have been included in the certification unit obligation for the certification process." "
86	5.2.1	"To encourage harmonization with EUDR related to traceability at the Self -Help Petanis level, I propose there are additional sentences in indicators 5.2.1: and UC prioritizes the partnership of buying and selling FFB with RSPO certified self -help farmers." "
87	5.2.2	"These documents and training courses must be produced in a language and format that can be understood by all stakeholders. Assessments must be guaranteed to be free from conflicts of interest with external stakeholders, and to meet objective audit criteria."
88	5.2.2	"In localities, mills must set up mechanisms with local governments to accelerate or assist smallholders. RSPO must work with governments to facilitate these procedures and help mills operationally to be compliant with P&C. Thresholds should be published to compare the progress reported by mills. Quantitative and qualitative targets, with an associated timeline, should be published to ensure that actions are progressing in the right direction."
89	5.2.2	"These documents and training courses must be produced in a language and format that can be understood by all stakeholders. Assessments must be guaranteed to be free from conflicts of interest with external stakeholders, and to meet objective audit criteria."
90	5.2.2	"In localities, mills must set up mechanisms with local governments to accelerate or assist smallholders. RSPO must work with governments to facilitate these procedures and help mills operationally to be compliant with P&C. Thresholds should be published to compare the progress reported by mills. Quantitative and qualitative targets, with an associated timeline, should be published to ensure that actions are progressing in the right direction."
91	5.2.2	These documents and training courses must be produced in a language and format that can be understood by all stakeholders. Assessments must be guaranteed to be free from conflicts of interest with external stakeholders, and to meet objective audit criteria.
92	5.2.2	The documented training list along with the list of participants, based on the findings of the assessment of the needs of plasma planters which includes aspects that apply from P&C RSPO and, if possible for interested independent planters must be available.
93	5.2.2	"Indicator 5.2.2 Proposed: The documented training list along with the list of participants, based on the findings of the assessment of the needs of plasma planters which includes aspects that apply from P&C RSPO and, if possible for interested independent planters must be available."
94	5.2.2	In indicators 5.2.2 List of documented training along with a list of participants, based on the findings of the assessment of the needs of plasma planters that include aspects that apply from P&C RSPO and, if possible for interested independent planters must be available.

#	Indicator	Comment (English)
95	5.2.2	Indicator 5.2.2 Proposal: Documented training list along with a list of participants, based on the findings of the assessment of the needs of plasma planters that include aspects that apply from P&C RSPO and, if possible for interested independent planters must be available.
96	5.2.2	"Indicator 5.2.2 Proposal: The documented training list along with the list of participants, based on the findings of the assessment of the needs of plasma planters which includes aspects that apply from P&C RSPO and, if possible for interested independent planters must be available."
97	5.2.2	"Proposed indicator improvement 5.2.2 to: The list of documented training along with the list of participants, based on the results of the assessment of the needs of plasma planters which includes aspects that apply from P&C RSPO and, if possible for interested independent planters must be available."
98	5.2.2	Indicator 5.2.2 (c) Proposed in order to: Documented Training List along with a list of participants, based on the findings of the assessment of the needs of plasma planters which include aspects that apply from P&C RSPO and, if possible for interested independent planters must be available.
99	5.2.2	Indicator 5.2.2 (c) Proposed in order to: Documented Training List along with a list of participants, based on the findings of the assessment of the needs of plasma planters which include aspects that apply from P&C RSPO and, if possible for interested independent planters must be available.
100	5.2.2	"Indicator proposal 5.2.2: The documented training list along with the list of participants, based on the findings of the assessment of the needs of plasma planters which includes aspects that apply from P&C RSPO and, if possible for interested independent planters must be available."
101	5.2.3	"In localities, mills must set up mechanisms with local governments to accelerate or assist smallholders. RSPO must work with governments to facilitate these procedures and help mills operationally to be compliant with P&C. Thresholds should be published to compare the progress reported by mills. Quantitative and qualitative targets, with an associated timeline, should be published to ensure that actions are progressing in the right direction."
102	5.2.3	"In localities, mills must set up mechanisms with local governments to accelerate or assist smallholders. RSPO must work with governments to facilitate these procedures and help mills operationally to be compliant with P&C."
103	5.2.3	"5.2.3. In localities, mills must set up mechanisms with local governments to accelerate or assist smallholders. RSPO must work with governments to facilitate these procedures and help mills operationally to be compliant with P&C."
104	5.2.3	In localities, mills must set up mechanisms with local governments to accelerate or assist smallholders. RSPO must work with governments to facilitate these procedures and help mills operationally to be compliant with P&C.

#	Indicator	Comment (English)
105	5.2.3	"In indicator 5.2.3 If it can be done, the certification unit provides support to Farmers to support the legality of FFB production (according to indicators 5.2.3 P&C 2018)"
106	5.2.3	"5.2.3 Changing the word ""must (shall)"" to ""if it can be done"" Consideration: Implementation of this indicator in planters with the status of independent farmers will be very dependent on their desires regarding the land legislation process. "
107	5.2.3	"Indicator 5.2.3 Proposed: If it can be done, the Certification Unit provides support to farmers to support the legality of FFB production (according to indicators 5.2.3 P&C 2018) "
108	5.2.3	Proposed Improvement of Indicators 5.2.3 to "if the Certification Unit can be carried out provides support to farmers to support the legality of FFB production (according to indicators 5.2.3 P&C 2018)
109	5.2.3	"Proposed indicator 5.2.3 add ""if it can be done"" at the beginning of the sentence the certification unit provided support to Farmers to support the legality of FFB production (according to indicators 5.2.3 P&C 2018) "
110	5.2.3	"Indicator 5.2.3 is proposed in order to: If it can be done, the certification unit provides support to Farmers to support the legality of FFB production (according to indicators 5.2.3 P&C 2018)"
111	5.2.3	"If it can be done, the certification unit provides support to Farmers to support the legality of FFB production (according to indicators 5.2.3 P&C 2018) "
112	5.2.3	Indicator 5.2.3 is proposed in order to: If it can be done, the Certification Unit provides support to farmers to support the legality of FFB production (according to indicators 5.2.3 P&C 2018)
113	5.2.3	Indicator 5.2.3 should be returned according to indicators 5.2.3 P&C 2018: If it can be done, the certification unit provides support to farmers to support the legality of TBS production
114	5.2.3	"Proposed indicator 5.2.3: If it can be done, the certification unit provides support to Farmers to support the legality of FFB production (according to indicators 5.2.3 P&C 2018) "

#	Indicator	Comment (English)
115	5.2.4	These additional activities must be documented in guidelines made available to them. These guidelines must be the result of consultations with relevant stakeholders.
116	5.2.4	"These additional activities must be documented in guidelines made available to them. These guidelines must be the result of consultations with relevant stakeholders."
117	5.2.4	"These additional activities must be documented in guidelines made available to them. These guidelines must be the result of consultations with relevant stakeholders."
118	5.2.4	"1. Propose to delete ""Considering the results of participatory consultations conducted with them"" 2. The Certification Unit develops and implements the livelihood improvement programs, including at least an increase in capacity to increase productivity, quality, ability organized and managerial, as well as certain elements in RSPO certification (including RSPO Standards for Independent Farmers)."
119	5.2.4	"For indicators 5.2.4 - propose to delete ""consider the results of participatory consultations conducted with them"" - The certification unit develops and implements life-ranking programs, including at least an increase in capacity to increase productivity, quality, ability organized and managerial, as well as certain elements in RSPO certification (including RSPO Standards for Independent Farmers)."
120	5.2.4	"5.2.4 Changing the word Farmer to an Independent Farmer Consideration: This indicator is more relevant for planters with independent smallholder (independent smallholder) status, while matters regarding the improvement of welfare for planters with the status of plasma planters (Schemed Smallholder) have been covered in the cooperation document of the Plasma Development Partnership. "
121	5.2.4	"Indicator 5.2.4 is proposed to: 1. Propose to delete ""Considering the results of participatory consultations conducted with them"". 2. The Certification Unit develops and implements the livelihood improvement programs, including at least an increase in capacity to increase productivity, quality, ability organized and managerial, as well as certain elements in RSPO certification (including RSPO Standards for Independent Farmers)."
122	5.2.4	Proposed Improvement of Indicators 5.2.4 Becomes: Certification Unit develops and implements life-improvement programs, including at least an increase in capacity to increase productivity, quality, organizational and managerial skills, as well as certain elements in RSPO certification (including RSPO standards for Independent farmers)
123	5.2.4	1. Propose "Considering the results of participatory consultations conducted with them" 2. The certification unit develops and implements life-improve program RSPO (including RSPO standard for independent farmers).

#	Indicator	Comment (English)
124	5.2.4	Indicator 5.2.3 is proposed so that the sentence becomes: If it can be done, the Certification Unit provides support to farmers to support the legality of FFB production (according to indicators 5.2.3 P&C 2018)
125	5.2.4	"Indicator 5.2.4 1. Propose ""Considering the results of participatory consultations conducted with them"" 2. The certification unit develops and implements life-improve program RSPO (including RSPO Standards for Independent Farmers)"
126	5.2.4	"Indicator 5.2.4 Proposed: 1. Propose to delete ""Considering the results of participatory consultations conducted with them"" 2. The Certification Unit develops and implements the livelihood improvement programs, including at least an increase in capacity to increase productivity, quality, ability organized and managerial, as well as certain elements in RSPO certification (including RSPO standards for independent farmers)."
127	5.2.4	"Proposal: 1. Propose to delete ""Considering the results of participatory consultations conducted with them"" 2. The Certification Unit develops and implements the livelihood improvement programs, including at least an increase in capacity to increase productivity, quality, ability organized and managerial, as well as certain elements in RSPO certification (including RSPO Standards for Independent Farmers)."
128	5.2.4	Indicator 5.2.4 is proposed in order to: (1). Propose to delete "Considering the results of participatory consultations conducted with them". (2). The Certification Unit develops and implements life-ranking programs, including at least an increase in capacity to increase productivity, quality, ability to organize and managerial, as well as certain elements in RSPO certification (including RSPO standards for independent farmers).
129	5.2.4	"Proposed indicator 5.2.4: 1. Propose to delete ""Considering the results of participatory consultations conducted with them"" 2. The Certification Unit develops and implements the livelihood improvement programs, including at least an increase in capacity to increase productivity, quality, ability organized and managerial, as well as certain elements in RSPO certification (including RSPO Standards for Independent Farmers)."
130	5.2.5	"Thresholds should be published to compare the progress reported by mills. Quantitative and qualitative targets, with an associated timeline, should be published to ensure that actions are progressing in the right direction."
131	5.2.5	Thresholds should be published to compare the progress reported by mills. Quantitative and qualitative targets, with an associated timeline, should be published to ensure that actions are progressing in the right direction.

#	Indicator	Comment (English)
132	5.2.5	"Thresholds should be published to compare the progress reported by mills. Quantitative and qualitative targets, with an associated timeline, should be published to ensure that actions are progressing in the right direction."

#	Indicator	Comment (English)
1	6.1	6.1 Part of the indicator 6.1.3 From the 2018 RSPO P&C it needs to be adopted to the draft 2023 P&C where the requirements/qualifications/abilities/expertise/expertise are determined by the certification unit for recruitment, training, certain promotions are not considered as a form of discrimination
2	6.1.1	6.1.1 Again, this indicator defies logic. Compressing the requirements of 4 previous indicators into 1 and merely listing requirements is an audit disaster.
3	6.1.1	RSPO could include discrimination based on any medical tests such as HIV/AIDS , pregnancy or other similar tests.
4	6.1.1	To provide clearer guidance on the procedure about publishing and socializing the policy to labour recruiters.
5	6.1.1	In indicators 6.1.1 there are editors' proposals namely "(c) Nondiscrimination policies that apply to recruitment, giving work and wages as well as access to training must be prepared and implemented. This nondiscrimination policy must include a prohibition on discrimination based on ethnic, caste, nationality, religion, disability, gender, marital status, pregnancy, sexual orientation, gender identity, migrant type, migrant worker status, membership in trade unions, political affiliation, and/or age. This policy is available for the public and is socialized to the workforce, operation and suppliers, and worker recruiters and implemented "
6	6.1.1	"Proposed Sentences Indicator: 6.1.1 (c) Nondiscrimination policies that apply to recruitment, giving work and wages and access to obtain training must be prepared and implemented. This nondiscrimination policy must include a prohibition on discrimination based on ethnic origin, caste, nationality, religion, disability, gender, marital status, pregnancy, sexual orientation, gender identity, migrant type, migrant worker status, membership in trade unions, political affiliation, and///// or age. This policy is available to the public and is socialized to labor, operations and suppliers, as well as worker recruiters and implemented "
7	6.1.1	"- ""work equipment"" work is changed to ""work equipment"" - The word allowance is eliminated, because the definition of wages includes allowances "
8	6.1.1	The need for changes in the sentence indicator 6.1.1, namely the word "work", "allowance", "promotion", "facility", and "work equipment" are proposed to be deleted, because it will be difficult in implementing and causing multi interpretations during the audit. - The company has the right to regulate compensation in accordance with the status of workers in accordance with the work agreement, PP or PKB.

#	Indicator	Comment (English)
9	6.1.1	<p>"1. Giving wages including benefits based on Types of work and worker status are not included discrimination. This has been spoken in the work agreement, Company regulations and collective work agreements.</p> <p>2. The word ""work equipment"" is changed to ""equipment Work""</p> <p>3. The word ""allowance"" is eliminated, because of the definition of wages already includes allowances.</p> <p>4. Sentence, ""This policy must be available to the public and socialized to labor, operations and suppliers, and worker recruiters. "" added ""... and implemented and monitored ""."</p>
10	6.1.1	<p>"6.1.1 ""Work Equipment"" Work is changed to ""work equipment""</p> <p>6.1.1 The word allowance is eliminated, because the definition of wages includes allowances</p> <p>"</p>
11	6.1.1	<p>"Proposed Improvement of Indicators: 6.1.1 (c) to:</p> <p>Nondiscrimination policies that apply to recruitment, giving work and wages and access to obtain training must be prepared and implemented. This nondiscrimination policy must include a prohibition on discrimination based on ethnic origin, caste, nationality, religion, disability, gender, marital status, pregnancy, sexual orientation, gender identity, migrant type, migrant worker status, membership in trade unions, political affiliation, and//// or age. This policy is available to the public and is socialized to labor, operations and suppliers, as well as worker recruiters and implemented.</p> <p>The word allowance is deleted because it has been covered in wages.</p> <p>The word ""work equipment"" work is changed to ""work equipment"" -</p> <p>The company has the right to regulate the compensation of each worker status in accordance with work agreements, company regulations or PKB which refer to national regulations.</p> <p>"</p>

#	Indicator	Comment (English)
12	6.1.1	Indicator 6.1.1 (c) Proposed in order to: 1. The word "work equipment" is changed to "work equipment" 2. The word allowance is eliminated, because the definition of wages already includes allowances. So that the sentence indicator 6.1.1 (c) becomes a "nondiscrimination policy that applies to recruitment, giving work and wages and access to obtain training must be prepared and applied. This nondiscrimination policy must include a prohibition on discrimination based on ethnic, caste, national, religious, religious Disability, gender, marital status, pregnancy, sexual orientation, gender identity, migrant type, migrant worker status, membership in trade unions, political affiliation, and/or age. This policy is available for the public and is socialized to labor, operations and suppliers, and worker recruiters and implemented ".
13	6.1.1	"6.1.1 ""Work Equipment"" Work is changed to ""work equipment"" 6.1.1 The word allowance is eliminated, because the definition of wages includes allowances"
14	6.1.1	"- ""work equipment"" work is changed to ""work equipment"" - The word allowance is eliminated, because the definition of wages includes allowances"
15	6.1.1	Indicator 6.1.1 (c) Proposed in order to: 1. The word "work equipment" is changed to "work equipment" 2. The word allowance is eliminated, because the definition of wages already includes allowances. So that the sentence indicator 6.1.1 (c) becomes a "nondiscrimination policy that applies to recruitment, giving work and wages and access to obtain training must be prepared and applied. This nondiscrimination policy must include a prohibition on discrimination based on ethnic, caste, national, religious, religious Disability, gender, marital status, pregnancy, sexual orientation, gender identity, migrant type, migrant worker status, membership in trade unions, political affiliation, and/or age. This policy is available for the public and is socialized to labor, operations and suppliers, and worker recruiters and implemented ".
16	6.1.1	"- The words ""giving work"", ""benefits"", ""promotion"", ""facilities"", and ""work equipment"" are proposed to be deleted, because it will be difficult in implementing and causing multi interpretations during the audit. - The company has the right to regulate compensation in accordance with the status of workers in accordance with the work agreement, PP or PKB."
17	6.1.1	"Indicator 6.1.1 (c) is proposed to: 1. The word ""work equipment"" is changed to ""work equipment"" 2. The word allowance is eliminated, because the definition of wages already includes allowances. So the indicator sentence 6.1.1 (c) becomes a ""nondiscrimination policy that applies to recruitment, giving work and wages and access to obtain training must be prepared and implemented. This nondiscrimination policy must include a prohibition on discrimination based on ethnic, caste, national, religious, disability, gender , marital status, pregnancy, sexual orientation, gender identity, migrant type, migrant worker status, membership in trade unions, political affiliation, and/or age. This policy is available to the public and is socialized to the workforce, operations and suppliers, and worker recruitment and implemented ""."

#	Indicator	Comment (English)
18	6.1.1	<p>"Proposal:</p> <ul style="list-style-type: none"> - ""work equipment"" work is changed to ""work equipment"" - The word allowance is eliminated, because the definition of wages includes allowances <p>HR Note:</p> <ul style="list-style-type: none"> - The words ""giving work"", ""benefits"", ""promotion"", ""facilities"", and ""work equipment"" are proposed to be deleted, because it will be difficult in implementing and causing multi interpretations during the audit. - The company has the right to regulate compensation in accordance with the status of workers in accordance with the work agreement, PP or PKB. <p>Proposed Sentences Indicator:</p> <p>6.1.1 (c) Nondiscrimination policies that apply to recruitment, giving work and wages and access to obtain training must be prepared and implemented. This nondiscrimination policy must include a prohibition on discrimination based on ethnic origin, caste, nationality, religion, disability, gender, marital status, pregnancy, sexual orientation, gender identity, migrant type, migrant worker status, membership in trade unions, political affiliation, and//// or age. This policy is available to the public and is socialized to labor, operations and suppliers, as well as worker recruiters and implemented"</p>
19	6.1.1	<p>The word "work equipment" is changed to "work equipment"; The word allowance is eliminated because the definition of wages includes allowances.</p>
20	6.1.1	<p>"6.1.1: Giving wages including benefits based on the type of work and the status of workers is not discriminatory. This has been spoken in the employment agreement, company regulations and collective labor agreements.</p> <p>6.1.1: The word ""work equipment"" is changed to ""work equipment""</p> <p>6.1.1: The word ""allowance"" is eliminated, because the definition of wages includes allowances.</p> <p>6.1.1: Sentence, ""This policy must be available to the public and socialized to the workforce, operations and suppliers, as well as worker recruiters."" added ""... and implemented and monitored""."</p>

#	Indicator	Comment (English)
21	6.1.1	"Proposed Sentences Indicator 6.1.1 Indicator sentence becomes: 6.1.1 (c) Nondiscrimination policies that apply to recruitment, giving work and wages and access to obtain training must be prepared and implemented. This nondiscrimination policy must include a prohibition on discrimination based on ethnic origin, caste, nationality, religion, disability, gender, marital status, pregnancy, sexual orientation, gender identity, migrant type, migrant worker status, membership in trade unions, political affiliation, and//// or age. This policy is available to the public and is socialized to labor, operations and suppliers, as well as worker recruiters and implemented "
22	6.1.1	"- ""work equipment"" work is changed to ""work equipment"" - The word allowance is eliminated, because the definition of wages includes allowances"
23	6.1.1	"Comment: - ""work equipment"" work is changed to ""work equipment"" - The word allowance is eliminated, because the definition of wages includes allowances Proposed changes: 6.1.1 (c) Nondiscrimination policies that apply to recruitment, giving work, wages, and access to obtaining training, promotion, facilities, and work equipment must be prepared and implemented. This nondiscrimination policy must include a prohibition on discrimination based on ethnic origin, caste, nationality, religion, disability, gender, marital status, pregnancy, sexual orientation, gender identity, migrant type, migrant worker status, membership in trade unions, political affiliation, and//// or age. This policy must be available to the public and socialized to workers, operations and suppliers, as well as worker recruiters."
24	6.1.2	6.1.2 This indicator has too many requirements and it is not auditable.
25	6.1.2	propose to add : implemented and monitored
26	6.1.2	"- The word allowance is eliminated, because the definition of wages includes allowances - This indicator is removed because the substance is the same and has been included in the proposed indicator 6.1.1 "
27	6.1.2	In indicator 6.1.2 it is proposed to be deleted because the substance is the same and has been included in the proposed indicator 6.1.1
28	6.1.2	"Indicator 6.1.2. deleted because it has been covered by indicators 6.1.1. by adding ""and implemented and monitored""."
29	6.1.2	"Proposed Indicator 6.1.2: - The indicator is deleted because the substance is the same and has been covered in the proposed indicator 6.1.1 so that it is reduced."

#	Indicator	Comment (English)
30	6.1.2	"Proposed indicator 6.1.2 Eliminating the word allowance, because the definition of wages includes allowances "
31	6.1.2	Proposed indicator 6.1.2 by changing the word "allowance", because the definition of wages already includes benefits. This indicator should be removed because the substance is the same and has been included in the proposed indicator 6.1.1
32	6.1.2	"The word allowance is eliminated, because the definition of wages includes allowances This indicator is removed because the substance is the same and has been included in the proposed indicator 6.1.1"
33	6.1.2	"Proposal: This 6.1.2 indicator is removed because the substance is the same and has been covered in the proposed indicator 6.1.1. Comment: - The definition of wages includes allowances "
34	6.1.2	"- The word allowance is eliminated, because the definition of wages includes allowances - This indicator is removed because the substance is the same and has been included in the proposed indicator 6.1.1"
35	6.1.2	"Indicator 6.1.2 Proposed: - The word allowance is eliminated, because the definition of wages includes allowances - This indicator is removed because the substance is the same and has been included in the proposed indicator 6.1.1"
36	6.1.2	"[I] 6.1.2 - The word allowance is eliminated, because the definition of wages includes allowances - This indicator is removed because the substance is the same and has been included in the proposed indicator 6.1.1"
37	6.1.2	"6.1.2 The word allowance is eliminated, because the definition of wages includes allowances 6.1.2 This indicator is removed because the substance is the same and has been included in the proposed indicator 6.1.1"
38	6.1.2	"Indicator 6.1.2 (c) is proposed for: - The word ""allowance"" is eliminated, because the definition of wages includes allowances - Indicator 6.1.2 (c) is removed because the substance is the same and has been included in the proposed indicator 6.1.1."
39	6.1.2	Proposed: Indicator 6.1.2 is removed because the substance is the same and has been included in the proposed indicator 6.1.1. Comment: - The definition of wages includes allowances

#	Indicator	Comment (English)
40	6.1.2	"Proposal: - The word allowance is eliminated, because the definition of wages includes allowances - This indicator is removed because the substance is the same and has been included in the proposed indicator 6.1.1"
41	6.1.2	6.1.2: The indicator is removed because it has been covered by indicator 6.1.1.
42	6.1.3	6.1.3 This is difficult to achieve especially when much of the work and oil palm estates is piece rated especially in Indonesia and Malaysia. More thought needs to go into this
43	6.1.3	"redundant with 6.1.2 for ""pay and benefit"" Remuneration is the total amount paid to an employee. It may include a salary or hourly rate, bonuses, commissions, or any other payment. In the view of the IRS, remuneration is the sum total of earnings and other taxable benefits and allowances."
44	6.1.3	I don't think that receiving equal remuneration (6.1.3) follows automatically from equal opportunities, incl. for pay and benefit (6.1.2). One looks into the process, the other into the results of an equal opportunity policy. Both are important. In the P&C 2018 there was an indicator calling for evidence of equal remuneration.
45	6.1.3	This indicator is removed because the substance is the same and has been included in the proposed indicator 6.1.1
46	6.1.3	In this 6.1.3 indicator it is proposed to be deleted because the substance is the same and has been included in the proposed indicator 6.1.1
47	6.1.3	Indicator 6.1.3. deleted because it has been covered by indicator 6.1.1. by adding "and implemented and monitored".
48	6.1.3	Indicator 6.1.3. deleted because it has been covered by indicator 6.1.1. by adding "and implemented and monitored".
49	6.1.3	"Proposal 6.1.3 This indicator is deleted because the substance is the same and has been included in the requirements in the indicator 6.1.1"
50	6.1.3	"Proposed Indicator 6.1.3: This indicator is deleted because the substance is the same as the indicator 6.1.1"
51	6.1.3	"Indicator 6.1.3 Proposed: This indicator is removed because the substance is the same and has been included in the proposed indicator 6.1.1"
52	6.1.3	"[I] 6.1.3 This indicator is removed because the substance is the same and has been included in the proposed indicator 6.1.1"
53	6.1.3	Proposed: Indicator 6.1.3 is removed because the substance is the same and has been covered in the proposed indicator 6.1.1.
54	6.1.3	This indicator is removed because the substance is the same and has been included in the proposed indicator 6.1.1
55	6.1.3	Indicator 6.1.3 proposed in order to: This indicator is removed, because the substance is the same and has been included in the proposed indicator 6.1.1.

#	Indicator	Comment (English)
56	6.1.3	Indicator 6.1.3 proposed in order to: This indicator is removed, because the substance is the same and has been included in the proposed indicator 6.1.1.
57	6.1.3	"Notes : Remuneration is regulated based on work agreements, PP or PKB. Proposal: This indicator is removed because the substance is the same and has been included in the proposed indicator 6.1.1"
58	6.1.3	This indicator is removed because the substance is the same and has been included in the proposed indicator 6.1.1
59	6.1.3	"6.1.3: The indicator is deleted because it has been covered by indicator 6.1.1. 6.1.1. added ""and implemented and monitored""."
60	6.2	not clear why it is specified "until" does it means that after the benchmark is established there will be no need to calculate the prevailing wage ? I doubt.
61	6.2	"We suggest the addition of a criteria related to working hours with specific instructions based on ILO recommendations or the local legal context A timeline for 2019 was set for this objective and the RSPO Labor task force was mentioned as responsible for it. A new deadline should be set no later than the end of 2023 and a working group identified as accountable. "
62	6.2	We suggest the addition of a criteria related to working hours with specific instructions based on ILO recommendations or the local legal context A timeline for 2019 was set for this objective and the RSPO Labor task force was mentioned as responsible for it. A new deadline should be set no later than the end of 2023 and a working group identified as accountable.
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66	6.2	"We suggest the addition of a criteria related to working hours with specific instructions based on ILO recommendations or the local legal context A timeline for 2019 was set for this objective and the RSPO Labor task force was mentioned as responsible for it. A new deadline should be set no later than the end of 2023 and a working group identified as accountable. "
67	6.2	"> Suggest RSPO: 6.2.2/6.2.3/6.2.4 about recruitment process would sit better under 6.7 > LW should be retained as overarching concept from P&C 2018: this should be reflected in the indicators, not just the minimum wage. It seems RSPO are taking a big step back on this topic. >LW should be the top indicator and an interim measure clearly outlined whilst the wage calculation procedure is being finalised. >Suggest RSPO to consult the NIWGs to address the LW issue and ensure balanced representation of NIWG members to look at the LW topic. >Ensure that LW concept is not hollowed out and implementation is not further delayed [Criteria 6.2: Pay and working and living conditions >There are 3 indicators 6.2.2/6.2.3/6.2.4 talk about recruitment process >Regarding prevailing wages, nothing to comment until RSPO releases the new guidance on prevailing wage calculation & procedure which will be made available by end of 2024. >The living wage problem depends on national regulations, context of the country, economic position of the country, position of the palm oil sector in each country etc. and this should be addressed within the national interpretations >The shift of responsibility to NIWGs – concern about weak representation of SNGOs in the NIWGs]"
68	6.2	"We suggest the addition of a criteria related to working hours with specific instructions based on ILO recommendations or the local legal context A timeline for 2019 was set for this objective and the RSPO Labor task force was mentioned as responsible for it. A new deadline should be set no later than the end of 2023 and a working group identified as accountable. "
69	6.2	"We suggest the addition of a criteria related to working hours with specific instructions based on ILO recommendations or the local legal context A timeline for 2019 was set for this objective and the RSPO Labor task force was mentioned as responsible for it. A new deadline should be set no later than the end of 2023 and a working group identified as accountable. "
70	6.2	""""We suggest the addition of a criteria related to working hours with specific instructions based on ILO recommendations or the local legal context A timeline for 2019 was set for this objective and the RSPO Labor task force was mentioned as responsible for it. A new deadline should be set no later than the end of 2023 and a working group identified as accountable. "" "

#	Indicator	Comment (English)
71	6.2	"We suggest the addition of a criteria related to working hours with specific instructions based on ILO recommendations or the local legal context A timeline for 2019 was set for this objective and the RSPO Labor task force was mentioned as responsible for it. A new deadline should be set no later than the end of 2023 and a working group identified as accountable. "
72	6.2	"We suggest the addition of a criteria related to working hours with specific instructions based on ILO recommendations or the local legal context A timeline for 2019 was set for this objective and the RSPO Labor task force was mentioned as responsible for it. A new deadline should be set no later than the end of 2023 and a working group identified as accountable. "
73	6.2	Achieving a living wage for all workers is essential. Please take into account the recommendations of the HRWG to explicitly refer to achieving a living wage in due time.
74	6.2	"We suggest the addition of a criteria related to working hours with specific instructions based on ILO recommendations or the local legal context A timeline for 2019 was set for this objective and the RSPO Labor task force was mentioned as responsible for it. A new deadline should be set no later than the end of 2023 and a working group identified as accountable. "
75	6.2	[HRSS] It is important to include LW at the criteria level to avoid a perceived lowering of the standards. Proposed wordings: "Criteria 6.2: Living Wage shall be paid to all workers, progressively. Working and living conditions for all Workers shall meet legal or industry minimum standards"
76	6.2	"Addition of Editor in Criteria 6.2: 6.2: Wages and working conditions and life for all workers must meet the minimum legal or industrial standards without a reduction in wages if workers have worked in the specified work time. Input to the use of the term Living Wage (LW), must be changed again to a decent Living Wage (DLW) "
77	6.2.1	"[HRSS] Propose to add ""d) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages and explained to them in a language they understand."" This is to ensure that the UoC explains applicable labour laws and makes copies of these laws available to them in a language they understand. This is to ensure there is no perceived reduction in the standards as it was already included in indicator 6.2.1.(C) of the 2018 P&C."

#	Indicator	Comment (English)
78	6.2.1	"[HRWG] Recommendation: Put the 2018 indicator back in. There should be no dilution of RSPO Standards in 2023. It is important that the UoC explain applicable laws to workers and make copies available to them in the worker's local languages so that they understand. This should apply to all workers, be it migrant or transmigrant. Not all workers know about the applicable laws in the country they are working. kers' local language."
79	6.2.1	6.2.1 Wrong spelling.
80	6.2.1	"Documents must be written in a language that can be understood by all stakeholders. A taskforce could be mobilized to help smallholders better understand their contracts and legal obligations, as well as their rights - and above all how to assert them. We need to define ""adequate"" and amend the ILO recommendations dating from 1961 with more up-to-date considerations"
81	6.2.1	"Documents must be written in a language that can be understood by all stakeholders. A taskforce could be mobilized to help smallholders better understand their contracts and legal obligations, as well as their rights - and above all how to assert them. We need to define ""adequate"" and amend the ILO recommendations dating from 1961 with more up-to-date considerations"
82	6.2.1	the "evidence" that a copy of contract has been given to the worker is important. The evidence could help when the worker interviewed by the auditor during the audit and they said didnt receive the copy of contract.
83	6.2.1	"Documents must be written in a language that can be understood by all stakeholders. A taskforce could be mobilized to help smallholders better understand their contracts and legal obligations, as well as their rights - and above all how to assert them. We need to define ""adequate"" and amend the ILO recommendations dating from 1961 with more up-to-date considerations"
84	6.2.1	"6.2.1. b. 'Explain' is one matter but the indicator should require objective evidence that the workers understand the content of their work contracts. c. Employment contracts for workers should be duly signed by employer and employee and 1 copy should be retained by the employee. "
85	6.2.1	"6.2.1 - While the text has provisions in place to ensure that payments and conditions of employment are understood by the workers, it does not require that the information is provided to workers before they enter employment"

#	Indicator	Comment (English)
86	6.2.1	6.2.1 - While the text has provisions in place to ensure that payments and conditions of employment are understood by the workers, it does not require that the information is provided to workers before they enter employment
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88	6.2.1	"Documents must be written in a language that can be understood by all stakeholders. A taskforce could be mobilized to help smallholders better understand their contracts and legal obligations, as well as their rights - and above all how to assert them. We need to define ""adequate"" and amend the ILO recommendations dating from 1961 with more up-to-date considerations"
89	6.2.1	"Documents must be written in a language that can be understood by all stakeholders. A taskforce could be mobilized to help smallholders better understand their contracts and legal obligations, as well as their rights - and above all how to assert them. We need to define ""adequate"" and amend the ILO recommendations dating from 1961 with more up-to-date considerations"
90	6.2.1	"Documents must be written in a language that can be understood by all stakeholders. A taskforce could be mobilized to help smallholders better understand their contracts and legal obligations, as well as their rights - and above all how to assert them. We need to define ""adequate"" and amend the ILO recommendations dating from 1961 with more up-to-date considerations."
91	6.2.1	"The below could be important to add: - prohibit zero hour contracts. •If workers work away from their base location they should be compensated for any additional living costs. •Workers should be provided with safe places to eat and rest. •Workers should have access during working hours to hygienic toilets which are free of charge. •Workers should have access to unlimited, clean drinking water within a reasonable distance of the work area which is available free of charge. "

#	Indicator	Comment (English)
92	6.2.1	<p>"Indicator 6.2.1 A: Add to the "".... In accordance with national legal requirements, existing together work agreements (if applicable) or other agreements in accordance with laws and regulations etc.).</p> <p>Consideration: In Indonesia, in addition to the Collective Labor Agreement there are also company regulations governing aspects of work order, workers' rights and obligations, and other employment matters. Company regulations are also recognized as its existence based on Indonesian laws and regulations."</p>
93	6.2.1	In indicator 6.2.1 For the phrase "These terms and conditions must include wages, regular working hours, discounts, overtime, pain leave, the right to get a holiday, maternity leave, reasons for termination of employment (layoffs), and notification period before layoffs" proposed to be deleted . Because it is contradictory to the previous sentence
94	6.2.1	The sentence "These terms and conditions must include wages, regular working hours, discounts, overtime, pain leave, the right to get a holiday, maternity leave, reasons for termination of employment (layoffs), and notification period before layoffs" proposed to be deleted. Because it is contradictory to the previous sentence
95	6.2.1	<p>"Indicator 6.2.1 (c) Proposed:</p> <p>The sentence ""These terms and conditions must include wages, regular working hours, discounts, overtime, pain leave, the right to get a holiday, maternity leave, reasons for termination of employment (layoffs), and notification period before layoffs"" proposed to be deleted. Because it is contradictory to the previous sentence"</p>
96	6.2.1	<p>"Proposal 6.2.1</p> <p>It is proposed to be deleted the phrase ""These terms and conditions must include wages, regular working hours, discounts, overtime, sick leave, the right to get a holiday, pregnancy leave, reasons for termination of employment (layoffs), and notification period before layoffs"". Because this requirement is contradictory to the previous sentence"</p>
97	6.2.1	The sentence "These terms and conditions must include wages, regular working hours, discounts, overtime, pain leave, the right to get a holiday, maternity leave, reasons for termination of employment (layoffs), and notification period before layoffs" proposed to be deleted. Because it is contradictory to the previous sentence
98	6.2.1	<p>"Proposed Indicator 6.2.1:</p> <p>Delete ""these terms and conditions must include wages, regular working hours, discounts, overtime, pain leave, the right to get a holiday, maternity leave, reasons for termination of employment (layoffs), and notification period before layoffs"" with reasons of contradictory with the previous sentence"</p>
99	6.2.1	The need for changes to the indicator 6.2.1: Removing the phrase "These terms and conditions must include wages, regular working hours, discounts, overtime, sick leave, the right to get a holiday, maternity leave, reasons for termination of employment (layoffs), and notification period before layoffs "For reasons of contradictory to the previous sentence

#	Indicator	Comment (English)
100	6.2.1	Indicator 6.2.1 (c) Proposed to: Deleted the phrase "These terms and conditions must include wages, regular working hours, discounts, overtime, pain leave, the right to get a holiday, pregnancy leave, reasons for termination of employment (layoffs), and notification period Before layoffs ", because it is contradictory to the previous sentence.
101	6.2.1	"[I] 6.2.1 The sentence ""These terms and conditions must include wages, regular working hours, discounts, overtime, pain leave, the right to get a holiday, maternity leave, reasons for termination of employment (layoffs), and notification period before layoffs"" proposed to be deleted. Because it is contradictory to the previous sentence"
102	6.2.1	"The phrase ""These terms and conditions must include wages, regular working hours, discounts, overtime, sick leave, rights get a holiday, maternity leave, reasons for termination of relationships work (layoffs), and notification period before layoffs. "" deleted, because it was included in the previous sentence."
103	6.2.1	6.2 .1 The sentence "These terms and conditions must include wages, regular working hours, discounts, overtime, sick leave, the right to get a holiday, pregnancy leave, reasons for termination of employment (layoffs), and notification period before layoffs" proposed to be deleted. Because it is contradictory to the previous sentence
104	6.2.1	The sentence "These terms and conditions must include wages, regular working hours, discounts, overtime, pain leave, the right to get a holiday, maternity leave, reasons for termination of employment (layoffs), and notification period before layoffs" proposed to be deleted. Because it is contradictory to the previous sentence
105	6.2.1	6.2.1 The sentence "these terms and conditions must include wages, regular working hours, discounts, overtime, pain leave, the right to get a holiday, maternity leave, reasons for termination of employment (layoffs), and notification period before layoffs" proposed to be deleted. Because it is contradictory to the previous sentence
106	6.2.1	"Proposal: The sentence ""These terms and conditions must include wages, regular working hours, discounts, overtime, pain leave, the right to get a holiday, maternity leave, reasons for termination of employment (layoffs), and notification period before layoffs"" proposed to be deleted. Because it is contradictory to the previous sentence"
107	6.2.1	Proposal 6.2.1 is proposed to be deleted the phrase "These terms and conditions must include wages, regular working hours, discounts, overtime, sick leave, the right to get a holiday, maternity leave, reasons for termination of employment (layoffs), and notification period before layoffs". Because this requirement is contradictory to the previous sentence
108	6.2.1	6.2.1: The phrase "These terms and conditions must include wages, regular working hours, discounts, overtime, sick leave, the right to get a holiday, pregnancy leave, reasons for termination of employment (layoffs), and notification period before layoffs." deleted, because it was included in the previous sentence.

#	Indicator	Comment (English)
109	6.2.1	6.2.1 Improve writing in casualties due to diseases and maternity.
110	6.2.1	It can be specified as "disability" and not "low"
111	6.2.1	6.2.1. (C) This is not necessarily stipulated in the contract, it is usually in the rit or mention that the labor law guidelines are met.
112	6.2.1	Changing the word "casualties" makes it known that there is a decoupling and it is not so.
113	6.2.1	[Abidjan WS] 6.2.1 c. Removed 'all workers' to specified to 'permanent and full time worker'
114	6.2.2	"[HRSS] To adopt Indicator 6.6.2(C) of the 2018 P&C which requires the UoC to introduce a specific labour policy and procedures are established and implemented where temporary or migrant workers are employed. This is to ensure that there are precautionary mechanisms in place to prevent any of the ILO Forced Labour Indicators. Propose to add, ""Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.""
115	6.2.2	6.2.2 This indicator merely requires a procedure. It does not support ethical hiring or the promotion of fairness. It is an ineffective indicator.
116	6.2.2	6.2.2 Not made available upon request. The procedures should be socialized and a summary of procedures (in a form of a handbook) should be provided to all workers in appropriate languages.
117	6.2.2	"Valid and substantiated reasons must be given for any dismissal. A notice period must be respected, in accordance with national labor law."
118	6.2.2	"Valid and substantiated reasons must be given for any dismissal. A notice period must be respected, in accordance with national labor law."
119	6.2.2	Valid and substantiated reasons must be given for any dismissal. A notice period must be respected, in accordance with national labor law.
120	6.2.2	"There is a guide note for indicators 6.2.2: Severance payment after layoffs must be paid in a maximum period of 30 days "
121	6.2.3	"Documents must be written in a language that can be understood by all stakeholders. A taskforce could be mobilized to help smallholders better understand their contracts and legal obligations, as well as their rights - and above all how to assert them. We need to define ""adequate"" and amend the ILO recommendations dating from 1961 with more up-to-date considerations"

#	Indicator	Comment (English)
122	6.2.3	"Documents must be written in a language that can be understood by all stakeholders. A taskforce could be mobilized to help smallholders better understand their contracts and legal obligations, as well as their rights - and above all how to assert them. We need to define ""adequate"" and amend the ILO recommendations dating from 1961 with more up-to-date considerations"
123	6.2.3	RSPO shall provide more clarification/guidance on the amendments to the employment contract that are mandated by law (e.g., minimum wages, etc.) and/or subjected to changes in the CBA shall be exempted from this indicator.
124	6.2.3	"Documents must be written in a language that can be understood by all stakeholders. A taskforce could be mobilized to help smallholders better understand their contracts and legal obligations, as well as their rights - and above all how to assert them."
125	6.2.3	Propose to move to 6.2.1 as 6.2.3 same topic regarding employment contract
126	6.2.3	"Documents must be written in a language that can be understood by all stakeholders. A taskforce could be mobilized to help smallholders better understand their contracts and legal obligations, as well as their rights - and above all how to assert them."
127	6.2.3	[Accra WS] 6.2.3 defined the extend and scope of amendment that need agreement. The agreement will need to be documented?
128	6.2.3	Documents must be written in a language that can be understood by all stakeholders. A taskforce could be mobilized to help smallholders better understand their contracts and legal obligations, as well as their rights - and above all how to assert them.
129	6.2.3	6.2.3 The indicator does not provide the opportunity for a collective agreement to amendments. In most labor situations, representatives are recognized.
130	6.2.3	[Sandakan, 21 June 2023] Propose to have this indicator to be absorbed into 6.2.1 as another key point
131	6.2.3	"Indicators are deleted and combined to indicators 6.2.1. Because it is still in one topic related to work contracts."
132	6.2.3	"Addition of editors to indicators 6.2.3: 6.2.3 (c) Changes in work contracts must be negotiated transparently and agreed by workers voluntarily, without pressure and coercion."
133	6.2.3	"Proposed 6.2.3: Combining indicators 6.2.3 with 6.2.1 because it is still in one unit related to work contracts in indicators 6.2.1 (Repetition of Indicators) "
134	6.2.3	6.2.3. Indicators are deleted and combined to indicators 6.2.1. Because it is still in one topic related to work contracts.

#	Indicator	Comment (English)
135	6.2.3	[Jakarta WS] 6.2.3 should be consolidated into 6.2.1
136	6.2.3	Improve the writing, "6.2.3 (c) The modifications of the employment contract must be agreed with the worker."
137	6.2.3	Improve the writing, "6.2.3 (c) The modifications of the employment contract must be agreed with the worker."
138	6.2.3	In Colombia it is not viable that the signing of the contract is made in the country of origin of the worker despite exercising his work in another country, the signing of the contract must be made according to the legislation of each country
139	6.2.3	change the writing, for - with
140	6.2.3	Improve the writing, "6.2.3 (c) The modifications of the employment contract must be agreed with the worker."
141	6.2.4	6.2.4 The migrant worker must understand the content of the contract, and their scope of work with no contract substitution and be provided a copy contract in their language. Illiterate migrant workers would have to be treated as special cases.
142	6.2.4	"This indicator requires more guidance on the intents of this indicator or otherwise this indicator shall be rephrased to a more auditable statement. Suggest clearer guidance to comply with this indicator. Following items/questions to be considered in the guidance documents: 1. What is the cut-off date for the international migrant workers? 2. Should auditor travels to the home country just to ensure the UoC comply with this indicator? 3. What are the documentation required for UoC to prove the migrant workers sign the contract in their home country? 4. Verification solely from interview by the auditor would be doubtful and can be influenced by various factors (e.g., language barriers, fear of vulnerability, etc.)."
143	6.2.4	"Documents must be written in a language that can be understood by all stakeholders. A taskforce could be mobilized to help smallholders better understand their contracts and legal obligations, as well as their rights - and above all how to assert them."
144	6.2.4	Documents must be written in a language that can be understood by all stakeholders. A taskforce could be mobilized to help smallholders better understand their contracts and legal obligations, as well as their rights - and above all how to assert them.
145	6.2.4	"Documents must be written in a language that can be understood by all stakeholders. A taskforce could be mobilized to help smallholders better understand their contracts and legal obligations, as well as their rights - and above all how to assert them."
146	6.2.4	[Accra WS] 6.2.4 define 'source country' the country that sourcing of workers?

#	Indicator	Comment (English)
147	6.2.4	"Addition of Editor in Indicator 6.2.4: 6.2.4 International migrant workers recruited in their home country must sign a certification unit work contract in their home country. The work contract may not reduce the rights of local workers."
148	6.2.4	"I don't know if it is applicable in all cases since each country has its own regulation. Writing proposal to avoid confusion in case of the legal framework, 6.2.4 International migrant workers who are hired in the country of origin will sign the contract in the country of the certification unit where they will carry out their activities."
149	6.2.4	6.2.4 International migrant workers who are hired in the country of origin will sign the contract in the country of the certification unit where they will carry out their activities. (This must be so that the UDC has no implications and legal)
150	6.2.4	6.2.4 It is not viable that a employment contract be signed in the country of origin of the person working in another country, the writing must be changed, the legislation of each country must be based.
151	6.2.4	Indicator does not apply, it has no legal basis that supports different conditions to the country where it will work.
152	6.2.4	"6.2.4 This can be illegal in some countries. The writing should change for: If the UDC hires migrant workers, it must comply with the applicable legislation as well as with the migratory processes required in the country where working will work."
153	6.2.4	In Colombia it is not viable that the signing of the contract is made in the country of origin of the worker despite exercising his work in another country, the signing of the contract must be made according to the legislation of each country
154	6.2.4	"Writing proposal to avoid confusion in case of the legal framework, 6.2.4 International migrant workers who are hired in the country of origin will sign the contract in the country of the certification unit where they will carry out their activities."
155	6.2.4	Check the writing, the indicator is not understandable,
156	6.2.4	"[Abidjan WS] 6.2.4 - to rewords - to provide clear definition of 'source country' . It should be reworded as 'Employment contract of International Migrant Workers hired shall be signed at the country or origin.' source country can refer to the UoC country - as sourcing party"
157	6.2.5	6.2.5. A revision is needed because there is an assumption that non-certified units would have lower-grade infrastructure than certified units. There is an element of bias here. Based on our experience of visiting certified units, there are instances where workers' housing in the certified unit is below the acceptable living standard.

#	Indicator	Comment (English)
158	6.2.5	6.2.5 Spelling error. There are many spelling errors. This is unacceptable for an international standard. RSPO should at least do a spell check before releasing this document for public comments.
159	6.2.5	we need to define "adequate" and amend the ILO recommendations dating from 1961 with more up-to-date considerations
160	6.2.5	"we need to define ""adequate"" and amend the ILO recommendations dating from 1961 with more up-to-date considerations"
161	6.2.5	propose to add"electricity supply" as it is also a basic need of a household and from financing perspective, it must be clear whether the facilities for worker, especially water and electricity supply, are free of charge or must be subsidized by the company.
162	6.2.5	6.2.5 Single bracket without closure.
163	6.2.5	we need to define "adequate" and amend the ILO recommendations dating from 1961 with more up-to-date considerations
164	6.2.5	6.2.5 C Adequately housing under international law means having secure tenure, in the future they are not worry about being evicted or if the home and lands taken away .Then add... to have access to appropriate services, to schools , and employment
165	6.2.5	Suggest to reinforce the requirement i.e. to make sanitation facilities available and sufficient in the plantation fields [Issue: There are insufficient sanitation facilities in the plantation fields]
166	6.2.5	Propose to rewording the TBP in the bracket into: (a reasonable timeline of 5 years). Reason being is every unit of certification have different size of plantation, some unit can achieve it in 5 years, and some larger plantation might need more time to achieve it.
167	6.2.5	"Please consider below inputs: <ul style="list-style-type: none"> •There could be controls if national standards are present but weak. The standard could require as a minimum that the accommodation should be safe, of solid construction and have natural and artificial light, an uninterrupted power supply, water supply, protection against weather conditions, ventilation and, when necessary, heating. Accommodation should be located in a building where high-risk operations do not take place and away from loud sources of noise. Amenities should also include designated cooking areas. •This criteria could also state that if accommodation is provided for men and women in the same building, separate rooms must be provided for each gender, unless residents choose to share a double room. •Need to have controls over the cost of accommodation – this should not exceed market rates. •Residents must also have the right to leave the accommodation at any time and must not be required to live in the designated accommodation. "
168	6.2.5	"We need more clarity... does the text mean.. Where accommodation is provided? Currently, it is open for interpretation as it may read that the company MUST provide accommodation"

#	Indicator	Comment (English)
169	6.2.5	"In this 6.2.5 indicator there are several proposals, namely: - The sentence ""storage that can be locked"" is deleted, because the worker has received a locked house facility - Sentence ""(including safe drinking water supply)"" deleted - sentence ""and/or international. See ILO Guide on Workers' Housing Recommendations No. 115 of 1961 if there is no applicable law"" deleted. Enough to refer to national law."
170	6.2.5	"6.2.5 Points a. In the ""safe drinking water supply"" to be changed to ""the affordability of drinking water"". Consideration : In a large plantation work area, it is not possible to supply drinking water to the field, but can provide a source of clean water or refill water depot in residential areas. "
171	6.2.5	"Proposed indicator 6.2.5: - The sentence ""storage that can be locked"" is deleted, because workers have gotten home facilities that can be locked by the door etc. - sentence ""(including safe drinking water supply)"" removed and revised into water supply - Proposed to be deleted the sentence ""and/or international. See ILO Guide on Workers' Housing Recommendations No. 115 of 1961 if there is no related law that applies"" deleted. Enough to refer to national law."
172	6.2.5	What is meant by retired time? better call: workers with a fixed work status
173	6.2.5	"- The sentence ""storage that can be locked"" is deleted, because the worker has got a locked home facility - Sentence ""(including safe drinking water supply)"" deleted - sentence ""and/or international. See ILO Guide on Workers' Housing Recommendations No. 115 of 1961 if there is no applicable law"" deleted. Enough to refer to national law."
174	6.2.5	"The word ""locked storage"" deleted, because workers have gotten home facilities can be locked and safe, including if this indicator is related with an indicator of 6.7.2 (c) identity documents, passports, and The work permit issued by the government must be stored by worker."
175	6.2.5	"- The sentence ""storage that can be locked"" is deleted, because the worker has got a locked home facility - Sentence ""(including safe drinking water supply)"" deleted - sentence ""and/or international. See ILO Guide on Workers' Housing Recommendations No. 115 of 1961 if there is no applicable law"" deleted. Enough to refer to national law."

#	Indicator	Comment (English)
176	6.2.5	Indicator 6.2.5 - The sentence "storage that can be locked" is deleted, because the worker has received a locked home facility - sentence "(including safe drinking water supply)" deleted - sentence "and/or international. See ILO Guide on Housing Recommendations Worker No. 115 of 1961 if there is no related law that applies "deleted. Enough to refer to national law.
177	6.2.5	"Indicator 6.2.5 (c) Proposed: - The sentence ""storage that can be locked"" is deleted, because the worker has got a locked home facility - Sentence ""(including safe drinking water supply)"" deleted - sentence ""and/or international. See ILO Guide on Workers' Housing Recommendations No. 115 of 1961 if there is no applicable law"" deleted. Enough to refer to national law."
178	6.2.5	"- The sentence ""storage that can be locked"" is deleted, because the worker has got a locked home facility - Sentence ""(including safe drinking water supply)"" deleted - sentence ""and/or international. See ILO Guide on Workers' Housing Recommendations No. 115 of 1961 if there is no applicable law"" deleted. Enough to refer to national law."
179	6.2.5	"6.2.5 Sentence ""Locking storage"" deleted, because workers have gotten home facilities that can be locked. 6.2.5 sentences ""(including safe drinking water supply)"" deleted 6.2.5 sentences ""and/or international. See ILO Guide on Worker Housing Recommendations No. 115 of 1961 if there is no related law that is applicable"" deleted. Enough to refer to national law. "
180	6.2.5	"[I] 6.2.5 - The sentence ""storage that can be locked"" is deleted, because the worker has got a locked home facility - Sentence ""(including safe drinking water supply)"" deleted - sentence ""and/or international. See ILO Guide on Workers' Housing Recommendations No. 115 of 1961 if there is no applicable law"" deleted. Enough to refer to national law."
181	6.2.5	"6.2.5 Sentence ""Locking storage"" is deleted, because workers have got a locked house facility - Sentence ""(including safe drinking water supply)"" deleted 6.2.5 sentences ""and/or international. See ILO Guide on Worker Housing Recommendations No. 115 of 1961 if there is no related law that is applicable"" deleted. Enough to refer to national law."
182	6.2.5	"Addition of editors to indicators 6.2.5: 6.2.5 (c). The facilities and equipment provided must be gender and child -friendly and meet national and/or international legal requirements."

#	Indicator	Comment (English)
183	6.2.5	"Indicator 6.2.5 (c) is proposed for: 1. The phrase ""Locking Storage"" is deleted, because workers have gotten home facilities that can be locked. 2. sentence ""(including safe drinking water supply)"" deleted. 3. sentence ""and/or international. See ILO Guide on Workers' Housing Recommendations No. 115 of 1961 if there is no applicable law"" is deleted. Enough to refer to national law."
184	6.2.5	"Word ""(including safe drinking water supply)"" deleted, because there are certain natural conditions Having difficulty getting water quality for safe drinking. The provisions of the Indonesian government are providing clean water facilities. "
185	6.2.5	Proposed Indicator 6.2.5 - The sentence "storage that can be locked" is deleted, because the worker has received a locked home facility - sentence "(including safe drinking water supply)" deleted - sentence "and/or international. See ILO Guide on Recommendations Workers' Housing No. 115 of 1961 if there is no applicable related law is "deleted. Enough to refer to national law.
186	6.2.5	"Point b ""(a maximum scheduled plan of 5 years)"" revised to ""a fair schedule plan for 5 year"". This is because each certification unit has a size different plantations, some units can achieved it before 5 years, and several plantations The bigger one may require more time to achieve it."
187	6.2.5	"Proposal: - The sentence ""storage that can be locked"" is deleted, because the worker has got a locked home facility - Sentence ""(including safe drinking water supply)"" deleted - sentence ""and/or international. See ILO Guide on Workers' Housing Recommendations No. 115 of 1961 if there is no applicable law"" deleted. Enough to refer to national law."
188	6.2.5	"Proposed indicator 6.2.5 - The sentence ""storage that can be locked"" is deleted, because the worker has got a locked home facility - Sentence ""(including safe drinking water supply)"" deleted - sentence ""and/or international. See ILO Guide on Workers' Housing Recommendations No. 115 of 1961 if there is no applicable law"" deleted. Enough to refer to national law."
189	6.2.5	Note Guidelines: Accommodation and gender-friendly facilities and children such as examples of sanitation facilities that have adequate lighting, separating female and male booths in order to minimize the potential for sexual violence.

#	Indicator	Comment (English)
190	6.2.5	<p>"6.2.5: The word ""locking storage"" is deleted, because workers have obtained housing facilities that can be locked and safe, including if this indicator is related to indicator 6.7.2 (c) Identity documents, passports, and work permits issued by the government must be stored by workers.</p> <p>6.2.5: word ""(including safe drinking water supply)"" removed, because there are certain natural conditions that cause difficulty getting water quality for safe drinking. The provisions of the Indonesian government are providing clean water facilities.</p> <p>6.2.5: point B ""(a maximum scheduled plan of 5 years)"" Revised to ""a fair schedule plan for 5 years"".</p> <p>This is because each certification unit has a different plantation size, some units can achieve it before 5 years, and some larger plantations may require more time to achieve it."</p>
191	6.2.5	6.2.5 Define the plan of the plan, as is in the 2018 version
192	6.2.5	6.2.5 Define the plan of the plan, as is in the 2018 version
193	6.2.5	In the case in which a producer aspires to receive his first certification that the auditor, numeral a) or numeral b) must apply, understanding that when new acquisitions are established, producers who are entering the certification scheme could be referenced and could Present to audit with a "plan" that demonstrates management and advances in infrastructure improvements.
194	6.2.5	6.2.5 Place in Spanish version temporary at Item B
195	6.2.5	[Abidjan WS] 6.2.5 a) Provide clarity on what is consider 'adequate'
196	6.2.6	6.2.6 This is a vague indicator. What is meant by "access to adequate, sufficient, and affordable food"? Who determines this?
197	6.2.6	The terms "adequate" and "affordable" need to be defined and set against the wage conditions of workers in different geographical areas and players.
198	6.2.6	"The terms ""adequate"" and ""affordable"" need to be defined and set against the wage conditions of workers in different geographical areas and players."
199	6.2.6	The terms "adequate" and "affordable" need to be defined and set against the wage conditions of workers in different geographical areas and players.
200	6.2.6	[Accra WS] 6.2.6 define 'make effort' how to audit? How to audit adequate, sufficient and affordable?
201	6.2.6	[Sandakan, 21 June 2023] Repetitive use of adequate and sufficient.

#	Indicator	Comment (English)
202	6.2.6	<p>"6.2.6 This indicator should be clarified.</p> <p>There are you who provide food due to the remoteness of its facilities or because it has camps; There are other UDCs that have the food service and, there are others, that only have a space so that their workers can eat there ... the conditions can be very different.</p> <p>It happened to me in a UDC that we wanted to remove the soda, we hired a nutritionist and we changed the menu (for a healthy one) and the workers were dissatisfied because they wanted to consume the black soda to which they were accustomed as well as the large and poorly balanced portions .. ."</p>
203	6.2.6	This has generated many interpretations during audits is not clear how it can be demonstrated.
204	6.2.6	[Abidjan WS] 6.2.6 what is the definition or clear requirement on 'adequate, sufficient, and affordable'. Affordable and sufficient food is beyond the control of UoC. What is the exact expectation?
205	6.2.7	"Documents must be written in a language that can be understood by all stakeholders."
206	6.2.7	Documents must be written in a language that can be understood by all stakeholders
207	6.2.7	[Accra WS] 6.2.7 Some tasks are meant to be on seasonal (e.g. FFB harvesting), turning this seasonal tasks into permanent hiring - may lead to workers hired with no other tasks for them. This may also lead to unintended consequences that the same worker cannot be hired after three round of hiring.
208	6.2.7	Documents must be written in a language that can be understood by all stakeholders
209	6.2.7	The term & condition of the three successive times shall be clarified and explained in the guidance for UoC to comply. Without clear direction, auditors can manipulate and interpret this term differently.
210	6.2.7	Suggest to frame around the jobs, i.e. if a work task is filled by temporary or casual workers, but is an ongoing task needed, then it constitutes core work and should be filled permanently. Suggest that the taskforce clearly describes the exceptions where temporary/casual work might be allowed and provides a clear timeframe for those jobs. Jobs that are continuously needed to be filled by default should not be done by temps. [It's now effectively allowing keeping workers in temporary roles for a series of appointments – if a job needs filling continuously it's part of core work and should be filled with a permanent staff member].
211	6.2.7	6.2.7 This will force employees not to hire any workers for casual work after the 3rd time because of the need to provide permanent employment opportunities. It creates a situation where seasonal job opportunities will be given to newcomers and locals depending on this will lose the opportunity to earn consistent casual income. Rethinking this indicator is suggested.
212	6.2.7	In West and Central Africa, casual and temporary workers are usually hired to support the oil palm plantations requirements during peak production seasons. It would be difficult to sustain this workforce, or provide them alternate work, during non-peak production seasons. Further, the term "successive time" needs to be clarified. 3 over a 3-year period?

#	Indicator	Comment (English)
213	6.2.7	[Accra WS] 6.2.7 - should not use 'successive time' unless it is clearly defined the engagement duration and what about is there is a gap between hiring (eg. a worker is hired for a month to harvest fruit, second rehired after three months and third rehired only after a year)?
214	6.2.7	Every country will have different ruling to protect the temporary workers and suggest not to specify the frequency of contract renewal.
215	6.2.7	[Sandakan, 21 June 2023] The definition for Casual Workers and Temporary Workers are available in the standard. To make it clearer, the definition for Casual Job and Temporary Job should be provided along with the list of activities.
216	6.2.7	<p>"In this 6.2.7 indicator there are several proposals, namely:</p> <ul style="list-style-type: none"> - It needs to be clarified again for the definition of core worker for gardens and factories, not all types of work enter the core worker - Addition to the first sentence, to be: ""Giving permanent and retired work (freelance workers and temporary workers) is carried out for all core work in the certification unit in accordance with applicable laws and regulations"". Because the applicable laws and regulations allow PKWT for core work under certain conditions. - The phrase ""freelance workers and temporary workers who are re-employed for the same job more than three times in a row given the opportunity to become a fixed time worker at the time of giving the fourth time. This offer must be documented""
217	6.2.7	<p>"- It needs to be clarified again for the definition of core worker for gardens and factories, not all types of work enter the core worker</p> <ul style="list-style-type: none"> - Addition to the first sentence, to be: ""Giving permanent and retired work (freelance workers and temporary workers) is carried out for all core work in the certification unit in accordance with applicable laws and regulations"". Because the applicable laws and regulations allow PKWT for core work under certain conditions. - The phrase ""freelance workers and temporary workers who are re-employed for the same job more than three times in a row given the opportunity to become a fixed time worker at the time of giving the fourth time. This offer must be documented""
218	6.2.7	<p>6.2.7 In the sentence "Freelance workers and temporary workers who have been employed for the same job 3 times in a row, to be offered to become permanent workers at the same job on the fourth occasion" to add the words "unless it has been stipulated differently in national laws and regulations"</p> <p>Consideration :</p> <p>Matters regarding freelance workers or workers with certain time work agreements (PKWT) for the context of Indonesia already have their own requirements in accordance with the laws and regulations.</p>

#	Indicator	Comment (English)
219	6.2.7	<p>"Proposed indicator 6.2.7:</p> <ul style="list-style-type: none"> - It needs to be clarified again for the definition of core worker for gardens and factories, not all types of work enter the core worker - Addition to the first sentence, to be: ""Giving permanent and retired work (freelance workers and temporary workers) is carried out for all core work in the certification unit in accordance with applicable laws and regulations"". Because the applicable laws and regulations allow PKWT for core work under certain conditions. - The phrase ""freelance workers and temporary workers who are re-employed for the same job more than three times in a row given the opportunity to become a fixed time worker at the time of giving the fourth time. This offer must be documented""
220	6.2.7	<p>"Proposed 6.2.7:</p> <ul style="list-style-type: none"> - Definition of Core Workers in Draft 2 for gardens and factories must be clarified more thoroughly. The definition mentioned by the draft 2 includes all activities or types of work in the factory and oil palm plantations. In the reality of field practice, not all types of work enter the core worker category - Indicator improvement 6.2.7 becomes <p>""The granting of permanent and retail work (freelance workers and temporary workers) is carried out for all core work in the certification unit in accordance with applicable laws and regulations"".</p> <p>This is because the applicable laws and regulations in Indonesia allow PKWT for core work under certain conditions (peak crops)</p> <ul style="list-style-type: none"> - It is proposed to be deleted the phrase ""freelance workers and temporary workers who are re-employed for the same job more than three times in a row given the opportunity to become a fixed retail worker at the time of giving the fourth time. This offer must be documented""
221	6.2.7	<p>"Indicator 6.2.7 is proposed to:</p> <ol style="list-style-type: none"> 1. Claimed again for the definition of core workers for gardens and factories, not all types of work enter the core worker. 2. Addition to the first sentence, to be: ""Giving permanent and retail work (freelance workers and temporary workers) is carried out for all core work in the certification unit in accordance with applicable laws and regulations"". Because the applicable laws and regulations allow PKWT for core work under certain conditions. 3. The sentence ""freelance workers and temporary workers who are re-employed for the same job more than three times in a row given the opportunity to become a fixed retail worker when giving the fourth time. This offer must be documented""

#	Indicator	Comment (English)
222	6.2.7	Indicator 6.2.7 - It is necessary to clarify again for the definition of core worker for gardens and factories, not all types of work enter the core worker - the addition of the first sentence, to: "the provision of permanent and reticine work (freelance workers and temporary workers) is done for all Core work in the certification unit in accordance with applicable laws and regulations ". Because the applicable laws and regulations allow PKWT for core work under certain conditions. - The phrase "freelance workers and temporary workers who are re-employed for the same job more than three times in a row given the opportunity to become a fixed time worker at the time of giving the fourth time. This offer must be documented"
223	6.2.7	"Need to be clarified again for the definition of core worker (Core work) for gardens and factories, because they are not All types of work enter the core worker. Core work in a certain period of time is possible requires seasonal workers (for example harvesters peak harvest). "
224	6.2.7	"This sentence is deleted, ""freelance workers and workers While those who are re-employed for the same job more than three times in a row are given the opportunity to become a fixed time worker when giving the fourth time. This offer must be documented """"
225	6.2.7	"6.2.7 It is necessary to be clarified again for the definition of core workers for gardens and factories, not all types of work enter the core worker 6.2.7 Addition to the first sentence, to: ""Giving permanent and retail work (freelance workers and temporary workers) is carried out for all core work in the certification unit in accordance with applicable laws and regulations"". Because the applicable laws and regulations allow PKWT for core work under certain conditions. 6.2.7 The sentence ""freelance workers and temporary workers who are re-employed for the same job more than three times in a row given the opportunity to become a fixed time worker at the time of giving the fourth time. This offer must be documented""""

#	Indicator	Comment (English)
226	6.2.7	<p data-bbox="353 210 465 242">"[I] 6.2.7</p> <ul style="list-style-type: none"> <li data-bbox="353 290 2033 322">- It needs to be clarified again for the definition of core worker for gardens and factories, not all types of work enter the core worker <li data-bbox="353 370 2033 475">- Addition to the first sentence, to be: ""Giving permanent and retired work (freelance workers and temporary workers) is carried out for all core work in the certification unit in accordance with applicable laws and regulations"". Because the applicable laws and regulations allow PKWT for core work under certain conditions. <li data-bbox="353 523 2033 580">- The phrase ""freelance workers and temporary workers who are re-employed for the same job more than three times in a row given the opportunity to become a fixed time worker at the time of giving the fourth time. This offer must be documented""
227	6.2.7	<p data-bbox="353 593 689 625">"Indicator 6.2.7 Proposed:</p> <ul style="list-style-type: none"> <li data-bbox="353 641 2033 673">- It needs to be clarified again for the definition of core worker for gardens and factories, not all types of work enter the core worker <li data-bbox="353 721 2033 826">- Addition to the first sentence, to be: ""Giving permanent and retired work (freelance workers and temporary workers) is carried out for all core work in the certification unit in accordance with applicable laws and regulations"". Because the applicable laws and regulations allow PKWT for core work under certain conditions. <li data-bbox="353 874 2033 932">- The phrase ""freelance workers and temporary workers who are re-employed for the same job more than three times in a row given the opportunity to become a fixed time worker at the time of giving the fourth time. This offer must be documented""
228	6.2.7	<ul style="list-style-type: none"> <li data-bbox="353 944 2033 976">"- It needs to be clarified again for the definition of core worker for gardens and factories, not all types of work enter the core worker <li data-bbox="353 1024 2033 1129">- Addition to the first sentence, to be: ""Giving permanent and retired work (freelance workers and temporary workers) is carried out for all core work in the certification unit in accordance with applicable laws and regulations"". Because the applicable laws and regulations allow PKWT for core work under certain conditions. <li data-bbox="353 1177 2033 1235">- The phrase ""freelance workers and temporary workers who are re-employed for the same job more than three times in a row given the opportunity to become a fixed time worker at the time of giving the fourth time. This offer must be documented""

#	Indicator	Comment (English)
229	6.2.7	<p>"6.2.7 It is necessary to be clarified again for the definition of core workers for gardens and factories, not all types of work enter the core worker</p> <p>6.2.7 Addition to the first sentence, to: ""Giving permanent and retail work (freelance workers and temporary workers) is carried out for all core work in the certification unit in accordance with applicable laws and regulations"". Because the applicable laws and regulations allow PKWT for core work under certain conditions.</p> <p>6.2."</p>
230	6.2.7	<p>"The phrase ""Giving permanent and retaining work done for all core work in the certification unit "" added ""In accordance with national regulations valid ""."</p>
231	6.2.7	<p>"Additional Definition: Enter the type of core work such as the Definition of PNC RSPO 2018 - All Agricultural and Milling Activities are Considered Core Work, E.G. Planting, Harvesting, Fertilizing, Maintenance; FFB Sorting and Grading; Machine-Technical Maintenance; and machine operation</p> <p>"</p>
232	6.2.7	<p>"6.2.7: The sentence "Permanent and full-time employment is carried out for all core work in the unit of certification" is added "in accordance with applicable national regulations".</p> <p>6.2.7: It needs to be clarified again for the definition of core workers (core work) for gardens and factories, because not all types of work enter the core worker. Core work in a certain period of time is possible to require seasonal workers (for example harvesters at the peak harvest).</p> <p>6.2.7: This sentence is deleted, ""loose workers and temporary workers who are re-employed for the same job more than three times in a row given the opportunity to become a fixed retail worker when giving the fourth time. This offer must be documented""</p>
233	6.2.7	<p>"- It needs to be clarified again for the definition of core worker for gardens and factories, not all types of work enter the core worker</p> <p>- Addition to the first sentence, to be: ""Giving permanent and retired work (freelance workers and temporary workers) is carried out for all core work in the certification unit in accordance with applicable laws and regulations"". Because the applicable laws and regulations allow PKWT for core work under certain conditions.</p> <p>- The phrase ""freelance workers and temporary workers who are re-employed for the same job more than three times in a row given the opportunity to become a fixed time worker at the time of giving the fourth time. This offer must be documented""</p>

#	Indicator	Comment (English)
234	6.2.7	<p>"Proposed changes: 6.2.7 Provision of permanent and retail work (freelance workers and temporary workers) is carried out for all core work in the certification unit in accordance with applicable laws and regulations.</p> <p>Comment: Definition of Core Work/Core Work. The last sentence is deleted."</p>
235	6.2.7	It needs to be clarified again for the definition of core workers for gardens and factories, not all types of work enter the core worker.
236	6.2.7	<p>"Proposed 6.2.7: (1). It needs to be clarified again for the definition of core workers for gardens and factories, not all types of work enter the core worker, (2). The addition in the first sentence, becomes: ""Provision of permanent and retail work (freelance workers and temporary workers) is carried out for all core work in the certification unit in accordance with applicable laws and regulations"". Because the applicable laws and regulations allow PKWT for core work under certain conditions, (3). The sentence ""freelance workers and temporary workers who are re-employed for the same job more than three times in a row given the opportunity to become a fixed time worker at the time of giving the fourth time. This offer must be documented"""</p>
237	6.2.7	<p>"There is a guide note for indicators 6.2.7:</p> <p>Note the guide in this indicator that workers should not be employed repeatedly for temporary contracts. Then, the referral used is a referral in regulations at the national level if there is a national law in force. Coalition records, in adopting national regulations or applicable national law, what needs to be ascertained is the regulation of the requirements fulfilled is the same as the prevailing standards in 2018 or the regulation is better. So. This discussion refers to national regulations if there is a national law that applies with the note that the regulated requirements must apply equally and/or better.</p> <p>Note: Calculation of Living Wage, Shall Refer to ILO Convention Number 26, 1928 on the Minimum Wage-Fixing Machinery and ILO Convention Number 131, 1970 on Minimum Wage Fixing. Facilities include but not limited to schools, clinics, housing, school bus, childcare, etc. "</p>
238	6.2.7	<p>"notes: 1. Replace ""given the opportunity to"" become ""automatically changed"" 2. Urge RSPO to make a list/ criteria for determining the types of core work, non -core that apply in various fields in accordance with the characteristics of land and planting years."</p>
239	6.2.7	6.2.5 Leave in the 2018 version

#	Indicator	Comment (English)
240	6.2.7	It should not be explained that the UDC is the one who must offer the possibility of becoming full -time workers, the subject of the fixed should be reviewed, or if it is considered permanent since it is seasonal work the advisable mechanism for hiring is hiring Temporary since it makes it easier for them to go to the place where their work is required. I suggest that the indicator is how it was in the 2018 version.
241	6.2.7	6.2.7 The temporality and approach of national legislation, elimination of direct fixed contraction and the national legislation of each country is complied with
242	6.2.7	It can be an error in translation, and instead of talking about fixed jobs you must talk about permanent jobs as referenced in the definition of "work" of the English version. It is important to make these revisions in the translations because it can generate incongruities when validating the indicator.
243	6.2.7	6.2.7 Establishing fixed positions after recurring rectation is not viable, since within the production cycle of the palm there are productive peaks, temporary hiring is complied with the National Law of Guatemala.
244	6.2.7	"Establishing fixed positions after a recurring rectation is not viable, since within the productive cycle of La Palma there are productive peaks, temporary hiring is complied with the Colombian national law, as in other countries. It can be an error in translation, and instead of talking about fixed jobs you must talk about permanent jobs as referenced in the definition of ""work"" of the English version. It is important to make these revisions in the translations because it can generate incongruities when validating the indicator."
245	6.2.7	I think this indicator for auditors is not clear, creates confusion and interpretations.
246	6.2.7	It is suggested that the indicator is as the 2018 version was. Not in all countries can be applied and it should be taken into account that palm cultivation is due to production peaks cycles, production is not constant.
247	6.2.7	"This indicator is not applicable as written. Work contracts must comply with the labor legislation of each country and must be consistent with the seasonality of the work (for example, production peaks). If it is left as it will cause many non -conformities because the auditors will take it literally."
248	6.2.7	What is the definition of a fixed contract vs. indefinite? It is not clear that you want in the indicator. The working conditions they demand refers to the certification unit must hire? or if the law allows essential field activities through contractors? as long as it is a fixed contract?
249	6.2.7	It should not be explained that the UDC is the one who must offer the possibility of becoming full -time workers, the subject of the fixed should be reviewed, or if it is considered permanent since it is seasonal work the advisable mechanism for hiring is hiring Temporary since it makes it easier for them to go to the place where their work is required. I suggest that the indicator is how it was in the 2018 version.

#	Indicator	Comment (English)
250	6.2.7	It is suggested that the indicator is as the 2018 version was. Not in all countries can be applied and it should be taken into account that palm cultivation is due to production peaks cycles, production is not constant.
251	6.2.7	[Abidjan WS] Define what is core work, what is the timeframe for the contract and what is the period defined as 'successive time'. This may create unintended outcome - where casual worker 'fruit collector or harvester' who will be hired on daily basis - may not now be able to hire to do the job after three contracts timeframe. Does it mean if the worker is hired on daily basis - it can only be limited to hire for three days?
252	6.2.8	6.2.8 c. There is a possibility that an agreed deduction for loan repayment could cause the wage to be below the minimum. This needs to be addressed.
253	6.2.8	6.2.8.f For how long should this commitment last?
254	6.2.8	[Accra WS] 6.2.8 f) define day wage - and the duration where this need to be pay. e.g. continuous storm for 1 week - should the UoC pay the whole week? What about for seasonal workers/ or workers on hourly?
255	6.2.8	Sustained objection: This is contradict with the Employment Act of Malaysia. The workers who turned up for full days work offered in a month are eligible for national minimum wage. However, if the workers are earning less than national minimum wage due to low productivity, there will still be some statutory deductions (electricity/water, insurance, EPF) which brings their take home salary below the legal/CBA minimum wage.
256	6.2.8	Suggest to change "explained" to "made available".
257	6.2.8	[Accra WS] 6.2.8(C) minimum wages - is gross/net? Removed or other from (Statutory or other) - as this will create different interpretation that UoC need to bear workers' taxes and/or loan.
258	6.2.8	We have comments on 6.2.8 (c) F. We disagree with this point since not all companies have sufficient reserves to deal with mid or long-term emergencies, and the consequences can be dramatic. An example could be the covid emergency, natural disasters such as hurricanes in Central America where plantations have been partially or totally lost, during which thousands of companies went bankrupt. This is a very complex issue that must be addressed in conjunction with each country's government. We propose to maintain the payment of health services and a percentage of the salary to be agreed upon at the country level (for cases of force majeure in the mid or long term).
259	6.2.8	Please define a day wage
260	6.2.8	"In the 6.2.8 indicator there are several proposals, namely: - Points C, the phrase ""may not cause a reduction in wages to below the minimum wage"" changed to ""in accordance with applicable laws and regulations"" - Points F, the certification unit must be committed to paying wages in accordance with the applicable laws and regulations in the event of a kahar (force majeure). "

#	Indicator	Comment (English)
261	6.2.8	<p>"6.2.8 points c. Please explain what is included as a type of piece. What if the worker does make mistakes based on the rules agreed upon in a joint work agreement should be given a fine? What about the deductions that are in accordance with the laws and regulations such as employment insurance, health insurance, old age insurance insurance in Indonesia known as BPJS. Is this included the intended discount? What about monthly discounts because workers take staple goods in the cooperative?</p> <p>As long as the intended type of discount is clear, based on an agreement between workers and the certification unit, or based on laws and regulations, it should not be seen as a violation of the 6.2.8 indicator of this C.</p> <p>6.2.8 points D and f. Point D to be deleted because the certification unit does not recognize workers who are family members. All workers are known as one particular individual.</p> <p>Point F to be explained again as Kahar's conditions are relevant for points F because of many Kahar conditions where the certification unit will be difficult to operate so that businesses cannot run for a long time, for example: war conditions, political upheaval, large natural disasters, etc. In conditions cannot operate it will be difficult to pay workers' wages."</p>
262	6.2.8	<p>"- Points C, the phrase ""may not cause a reduction in wages to below the minimum wage"" changed to ""in accordance with applicable laws and regulations"". - Points F, the certification unit must be committed to paying wages in accordance with the applicable laws and regulations in the event of a kahar (force majeure)."</p>
263	6.2.8	<p>"- Points C, the phrase ""may not cause a reduction in wages to below the minimum wage"" changed to ""in accordance with applicable laws and regulations"" - Points F, the certification unit must be committed to paying wages in accordance with the applicable laws and regulations in the event of a kahar (force majeure)."</p>
264	6.2.8	<p>Proposed on indicators 6.2.8: - Points C, the sentence "may not cause reduction in wages to below the minimum wage" changed to "in accordance with applicable laws and regulations" - Poin F, the certification unit must be committed to paying wages according to the laws and regulations -The applicable army if there is a state of kahar (force majeure).</p>

#	Indicator	Comment (English)
265	6.2.8	"Point a) sd f): added ""according to the rules valid "" Notes: In accordance with PP 36 of 2021 Article 65: The total amount Cutting wages at most 50% of each payment of wages received by workers."
266	6.2.8	""Proposed Indicator Improvement 6.2.8: - Points C, the phrase ""may not cause reduced wages to below the minimum wage"" revised to ""in accordance with applicable laws and regulations"" - Improvement of points F, becoming a certification unit must be committed to paying wages in accordance with the applicable laws and regulations in the event of a state majeure." "
267	6.2.8	"Indicator 6.2.8 (c) Proposed: - Points C, the phrase ""may not cause a reduction in wages to below the minimum wage"" changed to ""in accordance with applicable laws and regulations"" - Points F, the certification unit must be committed to paying wages in accordance with the applicable laws and regulations in the event of a kahar (force majeure)."
268	6.2.8	"[I] 6.2.8 - Points C, the phrase ""may not cause a reduction in wages to below the minimum wage"" changed to ""in accordance with applicable laws and regulations"" - Points F, the certification unit must be committed to paying wages in accordance with the applicable laws and regulations in the event of a kahar (force majeure). "
269	6.2.8	""Proposed Indicator 6.2.8: - Points C, the phrase ""may not cause a reduction in wages to below the minimum wage"" changed to ""in accordance with applicable laws and regulations"" - Points F, the certification unit must be committed to paying wages in accordance with the applicable laws and regulations in the event of a kahar (force majeure). "
270	6.2.8	6.2.8 Points a) SD f): added "according to applicable regulations"

#	Indicator	Comment (English)
271	6.2.8	"Indicator 6.2.8 (c) is proposed for: 1. Points C, the phrase ""may not cause reduced wages to below the minimum wage"" changed to ""in accordance with applicable laws and regulations"". 2. Point F is changed to ""the certification unit must be committed to paying wages in accordance with the applicable laws and regulations in the event of a state majeure""."
272	6.2.8	Indicator 6.2.8 (c) is proposed for: (1). Points C, the phrase "must not cause a reduction in wages to below the minimum wage" changed to "in accordance with applicable laws and regulations". (2). Point F was changed to "the certification unit must be committed to paying wages in accordance with the applicable laws and regulations in the event of a state majeure".
273	6.2.8	"Proposed changes in indicators 6.2.8 points c and f: c. All workers must receive a salary slip that shows all payment details and cuts. Deductions (compulsory or other) in accordance with applicable laws and regulations. f. The Certification Unit must be committed to paying wages in accordance with the applicable laws and regulations in the event of a state of kahar (force majeure)"
274	6.2.8	[Jakarta WS] 6.2.8 c. remove the word 'all' - just '.... payslip showing details...' as it will create challenges in auditing - what constitute 'all details'.
275	6.2.8	6.2.8: This sentence is deleted "pieces (mandatory or other) may not cause reduced wages to below the minimum wage"
276	6.2.8	"This sentence is deleted ""pieces (mandatory or other) may not cause a reduction in wages to under the minimum wage "" "
277	6.2.8	"Proposal: - Points C, the phrase ""may not cause a reduction in wages to below the minimum wage"" changed to ""in accordance with applicable laws and regulations"" - Points F, the certification unit must be committed to paying wages in accordance with the applicable laws and regulations in the event of a kahar (force majeure)."
278	6.2.8	Improve the definition "Force Mayor", in the list of definitions the concept of force majeure is left very wide, the scope should be limited.
279	6.2.8	Item F: Define "Force majeure case", or leave it at the discretion of the company according to its criteria and its analysis, both legal or internal criteria.
280	6.2.8	Define the concept of "force majeure", a mechanism must be determined to validate the absence for various reasons, it is recommended that it be subject to national legislation.

#	Indicator	Comment (English)
281	6.2.8	"6.2.8 (C) Subsection f) The scope to which the term ""force majeure"" should be defined must be defined"
282	6.2.8	"6.2.8 Comment in item c. Respect the national legislation of each country and the "legal" dynamics, since in each country there are legal deductions, which are applied to the minimum wage, define the dynamics of this item Item F: Define "Force majeure case", or leave it at the discretion of the company according to its criteria and its analysis, both legal or internal criteria. "
283	6.2.8	Really due to the scope of the definition, it is better to eliminate this indicator, since what companies can do is follow government guidelines to try to guarantee job stability.
284	6.2.8	This indicator is not sustainable. Even the agreement on the protection of salary #95, art. 8 (ILO) says that: "Salary discounts should only be allowed in accordance with the conditions and within the limits set by national legislation, a collective contract or an arbitral award. The workers should be indicated, in the way in which the competent authority deems most appropriate, the conditions and limits to be observed to be able to make such discounts. "
285	6.2.8	It is recommended that this be subject to national legislation, it is unfeasible to pay the minimum wage and subsidize law discounts for a producer.
286	6.2.8	Literal C, of indicator 6.2.8 (c) is not clear. Clarify that the minimum wage only deduces the concepts established by law, it seems that it says that the minimum wage will be paid without deductions of law and that is unfeasible in any country.
287	6.2.8	Legally the deductions of law are made using as a base the minimum wage therefore it is barely natural that the worker receives a figure below the minimum wage
288	6.2.8	"6.2.8 (c): Point C ""no deduction (legal or another type) may reduce payments below the minimum wage ""can be illegal (and cause of fines) in many countries because labor legislation allows tax deductions, labor security, loans, paternity food pension, etc. which must be respected the ""top"" of deductions that the law says. Also, point f. ""The UDC will commit to paying a day of wages in case of force majeure,"" can be interpreted in different ways, therefore, it must be specified to what force majeure refers."
289	6.2.8	The translation does not correspond to what is in the version in English, for example: f. The reach of force majeure is totally different in the scope.
290	6.2.8	"Literal C, of indicator 6.2.8 (c) is not clear. Clarify that the minimum wage only deduces the concepts established by law, it seems that it says that the minimum wage will be paid without deductions of law and that is unfeasible in any country."

#	Indicator	Comment (English)
291	6.2.8	[Abidjan WS] 6.2.8 c - replace 'all workers' to 'permanent and full time workers'.
292	6.2.9	6.2.9 b. This indicator needs to be revised as it should reflect the payment systems in plantations. The minimum wage is compulsory but in most situations, workers who have been working in non-piece rated tasks have only been paid minimum wage. These plantation workers will only see a pay increase when the minimum wage is increased by the government irrespective of the number of years worked for the UoC. Not all piece-rated work is calculated on the proportion of the legal minimum wage. There are other contributing factors, and this should be taken into consideration.
293	6.2.9	Here for clarity it should only say deduct the legal requirements.
294	6.2.9	Objectives must be defined in a way that is consistent with human feasibility over the course of a working day.
295	6.2.9	Performance bonuses to avoid undeclared workers on plantations
296	6.2.9	"Objectives must be defined in a way that is consistent with human feasibility over the course of a working day. a) Performance bonuses to avoid undeclared workers on plantations"
297	6.2.9	6.2.9 (a) Performance bonuses to avoid undeclared workers on plantations
298	6.2.9	Sustained objection: This is contradict with the Employment Act of Malaysia. The workers who turned up for full days work offered in a month are eligible for national minimum wage. However, if the workers are earning less than national minimum wage due to low productivity, there will still be some statutory deductions (electricity/water, insurance, EPF) which brings their take home salary below the legal/CBA minimum wage.
299	6.2.9	Objectives must be defined in a way that is consistent with human feasibility over the course of a working day.
300	6.2.9	"The sentence is not quite right and confusing ""c. Deductions shall not be made from a Worker's pay which reduces the Worker's pay to below the legal or CBA minimum wage."" If any legal deductions being made from a worker's salary, and if that particular month's earning is the same as legal/CBA wage, the worker's take home salary will be lower than legal/ CBA minimum wage. "
301	6.2.9	"In the 6.2.9 indicator there are several proposals, namely: - Changes in sentences in point C: ""Cutting workers' wages can be done in accordance with the agreement and refer to the applicable laws and regulations"" - All points, a to E, also added the phrase ""refer to the applicable laws and regulations"" - Changes in sentences in point d: ""Overtime work must be paid according to national legal tariffs or based on work agreements, company regulations or PKB"" - Changes in sentences in point E: ""If the working day is shortened due to the incident/injury due to a work accident, then the full day's wages are paid to any type of worker"""

#	Indicator	Comment (English)
302	6.2.9	"The sentence in point c is removed to be changed to ""Cutting wages can be done according to agreement and refer to regulations and applicable laws ""."
303	6.2.9	"Sentence in point d. changed to ""d. Work overtime must be paid according to national legal tariffs or based on work agreements, company regulations or employment agreements Together"". "
304	6.2.9	"The sentence in point E is changed to ""e. If it is working day shortened due to work accidents then a day's wage Full paid to any type of worker ""."
305	6.2.9	"- Changes in sentences in point C: ""Cutting workers' wages can be done in accordance with the agreement and refer to the applicable laws and regulations"" - All points, a to E, also added the phrase ""refer to the applicable laws and regulations"" - Changes in sentences in point d: ""Overtime work must be paid according to national legal tariffs or based on work agreements, company regulations or PKB"" - Changes in sentences in point E: ""If the working day is shortened due to the incident/injury due to a work accident, then the full day's wages are paid to any type of worker"""
306	6.2.9	"6.2.9 points c. Please explain what is included as a type of piece. What if the worker does make mistakes based on the rules agreed upon in a joint work agreement should be given a fine? What about the deductions that are in accordance with the laws and regulations such as employment insurance, health insurance, old age insurance insurance in Indonesia known as BPJS. Is this included the intended discount? What about monthly discounts because workers take staple goods in the cooperative? As long as the intended type of discount is clear, based on an agreement between workers and the certification unit, or based on laws and regulations, it should not be seen as a violation of the 6.2.9 indicator of this C. "

#	Indicator	Comment (English)
307	6.2.9	<p>"Indicator 6.2.9 (c) Proposed:</p> <ul style="list-style-type: none"> - Changes in sentences in point C: ""Cutting workers' wages can be done in accordance with the agreement and refer to the applicable laws and regulations"" - All points, a to E, also added the phrase ""refer to the applicable laws and regulations"" - Changes in sentences in point d: ""Overtime work must be paid according to national legal tariffs or based on work agreements, company regulations or PKB"" - Changes in sentences in point E: ""If the working day is shortened due to the incident/injury due to a work accident, then the full day's wages are paid to any type of worker""
308	6.2.9	<p>"Proposed 6.2.9 Improvement of Indicators:</p> <ul style="list-style-type: none"> - Improvement of points c to: ""Workers' wages can be done in accordance with the agreement and refer to the applicable laws and regulations"" - Dibalization of points A to E, added the phrase ""Referring to the laws and regulations that apply to each country"" - Changes in sentences in point d: ""Overtime work must be paid according to national legal tariffs or based on work agreements, company regulations or collective labor agreements (PKB)"" - Changes in sentences in point E: ""If the working day is shortened due to the incident/injury due to a work accident, then the full day's wages are paid to any type of worker""
309	6.2.9	"6.2.9 Points a) SD e): added ""according to the regulations valid"
310	6.2.9	<p>"notes:</p> <ol style="list-style-type: none"> 1. The sentence ""must be paid according to the legal minimum wage"" replace with ""every worker with a work period of under 1 year must be paid at least a legal minimum wage"". 2. General Note: Every PKB word must be preceded by an explanation of ""PKB negotiated"": Negotiated CBA. 3. Afterwards adding a definition of ""PKB negotiations according to procedures"" in particular this needs to be elaborated at 6.3.1."
311	6.2.9	<p>Proposed indicator 6.2.9 (c): - Changes in sentences in point C: "Cutting workers' wages can be done in accordance with the agreement and refer to the applicable laws and regulations" - All points, a to e, also added the sentence "refer to applicable laws and regulations "</p> <p>- Changes in sentences in point d:" Overtime work must be paid according to national legal tariffs or based on employment agreements, company regulations or PKB " - Changes in sentences in point E:" If the working day is shortened due to incidents/injury due to work accidents, then full a day wages are paid to any type of worker "</p>

#	Indicator	Comment (English)
312	6.2.9	<p>"Proposed Indicator 6.2.9] Proposed:</p> <ul style="list-style-type: none"> - Changes in sentences in point C: ""Cutting workers' wages can be done in accordance with the agreement and refer to the applicable laws and regulations"" - All points, a to E, also added the phrase ""refer to the applicable laws and regulations"" - Changes in sentences in point d: ""Overtime work must be paid according to national legal tariffs or based on work agreements, company regulations or PKB"" - Changes in sentences in point E: ""If the working day is shortened due to the incident/injury due to a work accident, then the full day's wages are paid to any type of worker""
313	6.2.9	<p>"6.2.9 Changes in sentences in point c: ""The work of workers' wages can be done in accordance with the agreement and refer to the applicable laws and regulations""</p> <ul style="list-style-type: none"> - All points, a to E, also added the phrase ""refer to the applicable laws and regulations"" <p>6.2.9 Changes in sentences in point d: ""Overtime work must be paid according to national legal tariffs or based on employment agreements, company regulations or PKB""</p> <p>6.2.9 Changes in sentences in point E: ""If the working day is shortened due to the incident/injury due to work accidents, then full a day wages are paid to any type of worker""</p>
314	6.2.9	<p>"Proposed changes in indicators 6.2.9:</p> <p>All workers must be paid according to the legal minimum wage or minimum wage negotiated in the Collective Labor Agreement (PKB), which is higher. The following are things that need to be considered in giving wages:</p> <ol style="list-style-type: none"> a. Performance bonus and overtime wage are not calculated as part of the legal minimum wage or PKB minimum wage refer to the applicable laws and regulations b. For wholesale work, proportional wages must be calculated based on legal minimum wages or tariffs in PKB refer to applicable laws and regulations c. Cutting workers' wages can be done in accordance with the agreement and refer to the applicable laws and regulations d. Overtime work must be paid according to national legal tariffs or based on employment agreements, company regulations or PKB e. If the working day is shortened due to incidents/injuries due to work accidents, then full a day wages are paid to any type of worker"

#	Indicator	Comment (English)
315	6.2.9	Indicator 6.2.9 (c) is proposed in order to: (1). Changes in sentences in point C to "Cutting workers' wages can be done in accordance with the agreement and refer to the applicable laws and regulations". (2). All points A to E added the phrase "refer to the applicable laws and regulations". (3). Changes in sentences in point d: "Overtime work must be paid according to national legal tariffs or based on work agreements, company regulations or PKB", (4). Changes in sentences in point E: "If the working day is shortened due to incidents/injuries due to work accidents, then full a day wages are paid to any type of worker".
316	6.2.9	"Indicator 6.2.9 (c) Proposed for: 1. Changes in sentences in point C to ""Cutting workers' wages can be done in accordance with the agreement and refer to the applicable laws and regulations"". 2. All points A to E added the phrase ""refer to the applicable laws and regulations"". 3. Changes in sentences in point d: ""Overtime work must be paid according to national legal tariffs or based on work agreements, company regulations or PKB"" 4. Changes in sentences in point E: ""If the working day is shortened due to the incident/injury due to work accidents, then full a day wages are paid to any type of worker""."
317	6.2.9	"Proposal: - Changes in sentences in point C: ""Cutting workers' wages can be done in accordance with the agreement and refer to the applicable laws and regulations"" - All points, a to E, also added the phrase ""refer to the applicable laws and regulations"" - Changes in sentences in point d: ""Overtime work must be paid according to national legal tariffs or based on work agreements, company regulations or PKB"" - Changes in sentences in point E: ""If the working day is shortened due to the incident/injury due to a work accident, then the full day's wages are paid to any type of worker"""
318	6.2.9	"6.2.9 Points a) SD e): added ""according to applicable regulations"" 6.2.9: The sentence in point c is deleted to be changed to ""Cutting wages can be done in accordance with the agreement and refer to applicable regulations and regulations"". 6.2.9: Sentences in point d. changed to ""d. Overtime work must be paid according to national legal tariffs or based on employment agreements, company regulations or collective labor agreements "". 6.2.9: The sentence in point E is changed to ""e. If the working day is shortened due to work accidents, the full day wages are paid to any type of worker ""."

#	Indicator	Comment (English)
319	6.2.9	<p>"6.2.9 points c. Please explain what is included as a type of piece. What if the worker does make mistakes based on the rules agreed upon in a joint work agreement should be given a fine? What about the deductions that are in accordance with the laws and regulations such as employment insurance, health insurance, old age insurance insurance in Indonesia known as BPJS. Is this included the intended discount? What about monthly discounts because workers take staple goods in the cooperative?</p> <p>As long as the intended type of discount is clear, based on an agreement between workers and the certification unit, or based on laws and regulations, it should not be seen as a violation of the 6.2.9 indicator of this C. "</p>
320	6.2.9	Literal E, is not clear in its reach, subjectivity for auditors, must specify that in countries where this is regulated, it will apply.
321	6.2.9	I consider not to include in the indicator that the measurement is on the salary negotiated by collective bargaining agreement (ANC). The indicator must be measured on the minimum and not on the salary agreed with the workers and their representatives.
322	6.2.9	I consider not to include in the indicator that the measurement is on the salary negotiated by collective bargaining agreement (ANC). The indicator must be measured on the minimum and not on the salary agreed with the workers and their representatives.
323	6.2.9	I do not agree clearly in literal C, of indicator 6.2.9 (c). Clarify that the minimum wage only deduces the concepts established by law, it seems that it says that the minimum wage will be paid without deductions of law and that is unfeasible in any country.
324	6.2.9	There are deductions of law that are allowed in each country, it is suggested that this be subject to national legislation or eliminate this indicator.
325	6.2.9	It must be subject to national legislation.
326	6.2.9	In Latam, the work codes are clear in what can and that cannot be deduced from a salary. Not fulfilling the country's law is not viable, as well as thinking that a UDC will be sustainable if the minimum wage is "free" of deductions ... This is unfeasible and unsustainable.
327	6.2.9	Take into account the law of each country regarding deductions on the minimum wage, in many countries the deductions are allowed under certain conditions and up to a maximum percentage
328	6.2.10	Suggest to split into several indicators for ease of raising CARs as frequently underlined by auditors in previous revision processes. [Too many elements in one single indicator]
329	6.2.10	A taskforce can be set up by the RSPO and relevant players to define guidelines to be followed by the Unit of Certifications - to define and implement this policy
330	6.2.10	"All means made available to employees can be easily audited to ensure non-intervention by the unit of certification."
331	6.2.10	"A taskforce can be set up by the RSPO and relevant players to define guidelines to be followed by the Unit of Certifications - to define and implement this policy "

#	Indicator	Comment (English)
332	6.2.10	[Sandakan, 21 June 2023] Leniency to MG. The Prevailing Wage Calculation Procedure implementation by the UoC (MG) should be given within 12 months of its issuance.
333	6.2.10	6.2.10 Prevailing wage calculation. There should be proper interim guidance as this gap has existed for many years. It is suggested that the living wage be calculated for each work category rather than averaging out. An example would be, piece rated harvesters would earn twice the amount of maintenance workers, and if it is done collectively as one living wage calculation, it will skew the living wage determination.
334	6.2.10	[HRSS] It is important to include LW at the indicator level to avoid a perceived lowering of the standards. Proposed to add "6.2.10(C) Living Wages shall be paid to all workers. As the first step towards paying Living Wage, the Unit of Certification shall calculate their prevailing wages annually in accordance to RSPO Prevailing Wage Calculation Procedure..... "
335	6.2.10	[6.2.10] What is the objective of calculating the prevailing wage? Could auditor expect additional information on top of the calculation?
336	6.2.10	"The Indonesian government has a policy Wages that must be obeyed by the Certification Unit. RSPO Procedure Regarding Applicable Wage Calculation must be in accordance with the provisions of the Indonesian government."
337	6.2.10	6.2.10. The Indonesian government has a wage policy that must be obeyed by the certification unit. The RSPO procedure regarding the applicable wage calculation must be in accordance with the provisions of the Indonesian government.
338	6.2.10	Salaries must be subject to minimum wages established in each country,
339	6.2.10	The prevailing salary guide must be put to a public consultation that will be removed in 2024, since it must take into account all the benefits that each country is currently granted to the worker beyond the payment of the minimum wage
340	6.2.10	6.2.10 It is requested to respect the national legislation of each country, according to its salary established by the Government.
341	6.2.10	"There should be a consultation in this regard to validate the applicability and clarity of the prevailing salary guide that will be issued in 2024 and give a greater term to its implementation. In addition, it must be explicit that the prevailing salary is a calculation of each certification unit and should not be compared with other companies or an average industry. What is the purpose of calculating the prevailing salary if you can talk about minimum wage. It is not clear about the need to calculate the prevailing salary and what is the final purpose of presenting it before a certification audit, since it does not take into account the individuals that exist in each country, state or department, area, type of UDC and even the Influence of the sector. It is a risk to calculate the prevailing salary if the peculiarity of each UDC is not recognized and that in the end all must be fulfilling the payment of the minimum wage."
342	6.2.10	According to this comment.

#	Indicator	Comment (English)
343	6.2.10	What is the purpose of calculating the prevailing salary if you can talk about minimum salt. It is not clear about the need to calculate the prevailing salary and what is the final purpose of presenting it before a certification audit, since it does not take into account the individuals that exist in each country, state or department, area, type of UDC and even the Influence of the sector. It is a risk to calculate the prevailing salary if the peculiarity of each UDC is not recognized and that in the end all must be fulfilling the payment of the minimum wage.
344	6.2.10	It should not be reviewed with the GT-SD, it is a guide that must be built with all representatives of the different sectors and even take it to public consultation.
345	6.3	6.3 "Employer facilitates a parallel means of independent and free association and bargaining for all Workers through representatives of their choice." How is this translated into an indicator? When in most cases, wages and piece rates are predetermined based on other factors.
346	6.3	""No repression of any kind will be tolerated by the unit of certification towards the workers. Discussion forums must be set up between employee representatives and the company to promote conflict management, improve company life or simply comply with the law.""
347	6.3	"No repression of any kind will be tolerated by the unit of certification towards the workers. Discussion forums must be set up between employee representatives and the company to promote conflict management, improve company life or simply comply with the law."
348	6.3	6.3.2 This is not an auditable indicator, it is a wishlist and requires in-depth investigation to determine conformity. This indicator calls for a UoC report providing the information required in indicators 6.3.1 - 6.3.4. It should be referred to as a report supporting workers' rights.
349	6.3	"Input: Addition of indicators to criteria 6.3: Add ""Unit Certification Assures a Safe Environment for Workers and Their Representative to Encourage Constructive Social Dialogue."" Add ""Collective Bargaining Agreement"" as Indicator of Social Dialogue in Unit Certification. "
350	6.3.1	"to anybody or to stakeholders ? then it could be added in the guidance of 1.1.1"
351	6.3.1	All means made available to employees can be easily audited to ensure non-intervention by the unit of certification.
352	6.3.1	a taskforce must be set up by the RSPO to occasionally review or even audit grievances related to these subjects in the plantations or Mills with the workers, without restriction of the unit of certifications

#	Indicator	Comment (English)
353	6.3.2	6.3.1 The collective construct is not included. It is assumed that there will always be CBAs. How the CBAs are developed should be guided by the indicator requirements.
354	6.3.2	"Propose the sentences stop on :shall be provided free of charge... This because every company has its own policy regarding the facilities provided to its workers. The term ""monitored"" is too broad to be audited by the CB and it would be difficult for the CB to check its implementation."
355	6.3.2	A taskforce can be set up by the RSPO and relevant players to define guidelines to be followed by the Unit of Certifications - to define and implement this policy
356	6.3.2	"If necessary, workers' anonymity must be guaranteed."
357	6.3.2	6.3.2: The phrase "and not monitored by the Certification Unit" is deleted so that it becomes "facilities for workers to be able to interact with each other and with their representatives must be given free of charge" because each company has their respective policies for the facilities provided to their workers. The term "monitored" is too broad to be audited by CB and will be difficult to check its implementation by CB.
358	6.3.2	"The phrase ""and not monitored by the Certification Unit"" deleted so that it becomes a ""facility for workers in agar can interact with each other and with its representatives must be given free of charge ""because each company has their respective policies for the facilities provided to their workers. The term ""monitored"" is too broad to be audited by CB and will be difficult to check its implementation by CB."
359	6.3.3	a taskforce must be set up by the RSPO to occasionally review or even audit grievances related to these subjects in the plantations or Mills with the workers, without restriction of the unit of certifications
360	6.3.3	"a taskforce must be set up by the RSPO to occasionally review or even audit grievances related to these subjects in the plantations or Mills with the workers, without restriction of the unit of certifications "
361	6.3.3	I propose the implementation time from 6 months into 1 year after the prevailing wage calculation procedure is issued. We need time to socialize the procedure well and clearly to all of unit operations before it is implemented.
362	6.3.3	If necessary, workers' anonymity must be guaranteed.
363	6.3.3	In this 6.3.3 indicator it is proposed that there is no need for monitoring every year because the timeline is already in the minutes of the meeting held routinely

#	Indicator	Comment (English)
364	6.3.3	"Indicator 6.3.3 Proposed for: 1. There is no need for monitoring every year because there is already an minutes of the meeting held routinely. 2. It is proposed that the phrase is proposed ""All actions agreed upon in this meeting are held and monitored every year""."
365	6.3.3	Proposed 6.3.3: Monitoring every annual is abolished ... because there is a meeting held routinely and all the results of the meeting agreed upon in the meeting held and monitored every year.
366	6.3.3	"There is no need for monitoring every year because there is already an minutes of the meeting held routinely. Proposed deleted: All actions agreed upon in this meeting are carried out and monitored every year."
367	6.3.3	"Indicator 6.3.3 Proposed: There is no need for monitoring every year because there is already an minutes of the meeting held routinely. Proposed deleted: All actions agreed upon in this meeting are carried out and monitored every year."
368	6.3.3	"The word ""monitored every year"" is deleted. Frequency Monitoring is established jointly between the Certification Unit with registered trade unions/unions."
369	6.3.3	"[I] 6.3.3 There is no need for monitoring every year because there is already an minutes of the meeting held routinely Proposed deleted: All actions agreed upon in this meeting are carried out and monitored every year."
370	6.3.3	Proposed changes in indicators in 6.3.3: The note of meetings between the certification unit and the registered trade union and the registered union must be documented and provided according to request.
371	6.3.3	Proposed changes in indicators 6.3.3: The notula of the meeting between the certification unit and the registered worker organization and the registered union must be documented and provided according to request.
372	6.3.3	"There is no need for monitoring every year because there is already an minutes of the meeting held routinely All actions agreed upon in this meeting are held and monitored every year."
373	6.3.3	Indicator 6.3.3 is proposed in order to: (1). There is no need for monitoring every year because there is already an minutes of the meeting held routinely. (2). It was proposed that the phrase was proposed "All actions agreed upon in this meeting were held and monitored every year".

#	Indicator	Comment (English)
374	6.3.3	"There is no need for monitoring every year because there is already an minutes of the meeting held routinely Proposed deleted: All actions agreed upon in this meeting are carried out and monitored every year."
375	6.3.3	"Proposal: There is no need for monitoring every year because there is already an minutes of the meeting held routinely Proposed deleted: All actions agreed upon in this meeting are carried out and monitored every year."
376	6.3.3	"Indicator 6.3.3 Proposed deleted: All actions agreed upon in this meeting are carried out and monitored every year."
377	6.3.3	6.3.3: The word "monitored every year" is deleted. The frequency of monitoring is determined between the certification unit and the registered trade union/union.
378	6.3.4	All means made available to employees can be easily audited to ensure non-intervention by the unit of certification.
379	6.3.4	If necessary, workers' anonymity must be guaranteed.
380	6.3.4	"Suggest to ensure that any use of biological control agents complies with national legislation. [The use of a Biological Control Agent (BCA) is the preferred option for the management of pests]."
381	6.3.4	Deleted due to redundant with 6.1.1. related to discrimination
382	6.3.4	"Proposal: Indicator 6.3.4 is deleted due to redundant with 6.1.1. related to discrimination."
383	6.3.4	For indicators 6.3.4 it is proposed to be deleted due to redundant with 6.1.1. related to discrimination
384	6.3.4	Proposed Indicator 6.3.4: Interesting this indicator due to repetition related to 6.1.1 regarding discrimination
385	6.3.4	"Proposal: Deleted due to redundant with 6.1.1. related to discrimination"
386	6.3.4	"[I] 6.3.3 Deleted due to redundant with 6.1.1. related to discrimination"
387	6.3.4	"Indicator 6.3.4 Proposed: Deleted due to redundant with 6.1.1. related to discrimination"
388	6.3.4	Indicator 6.3.4 is proposed to: deleted due to redundant with 6.1.1. related to discrimination.
389	6.3.4	"Delete the phrase ""Internship Participants must get paid and given a salary slip. ""Referring to national regulations."

#	Indicator	Comment (English)
390	6.3.4	"Proposal: Indicator 6.3.4 is deleted due to redundant with 6.1.1. related to discrimination"
391	6.3.4	"Proposed indicator 6.3.4: This indicator is due to repetition related to 6.1.1 regarding discrimination"
392	6.3.4	Deleted due to redundant with 6.1.1. related to discrimination
393	6.3.4	6.3.4: The indicator is deleted because it has been covered by indicators 6.1.1. related to discrimination
394	6.4	"Gender discrimination must not be tolerated in the workplace. Labor law must be applied irrespective of an employee's origin or gender - or at least aim for this independence. The women welfare committee should include representatives from all positions/work type The committee member should allow the committee to be safe place for discussion with no discrimination related to the position of the participating member"
395	6.4	"The unit of certification must be able to prove the identity and age of each worker - but without confiscating or withholding identity papers. In the event of non-possession of identity papers, the unit of certification must help the worker to obtain them. Acknowledging that the P&C requires socialization of the child protection policy to everyone, consider conducting in-depth training, especially to those who are in contact with children (including workers and contractors). Ensure that all who are in contact with children are subjected to background checks. Consider conducting a child protection risk assessment to identify salient child protection issues. The company should have a governance and reporting structure in place to ensure proper implementation of the policy."
396	6.4	"Gender discrimination must not be tolerated in the workplace. Labor law must be applied irrespective of an employee's origin or gender - or at least aim for this independence. The women welfare committee should include representatives from all positions/work type The committee member should allow the committee to be safe place for discussion with no discrimination related to the position of the participating member"
397	6.4	No repression of any kind will be tolerated by the unit of certification towards the workers or among workers

#	Indicator	Comment (English)
398	6.4	<p>"Gender discrimination must not be tolerated in the workplace. Labor law must be applied irrespective of an employee's origin or gender - or at least aim for this independence.</p> <p>The women welfare committee should include representatives from all positions/work type The committee member should allow the committee to be safe place for discussion with no discrimination related to the position of the participating member"</p>
399	6.4	"No repression of any kind will be tolerated by the unit of certification towards the workers or among workers"
400	6.4	<p>"Gender discrimination must not be tolerated in the workplace. Labor law must be applied irrespective of an employee's origin or gender - or at least aim for this independence.</p> <p>The women welfare committee should include representatives from all positions/work type The committee member should allow the committee to be safe place for discussion with no discrimination related to the position of the participating member"</p>
401	6.4	<p>"The unit of certification must be able to prove the identity and age of each worker - but without confiscating or withholding identity papers.</p> <p>""In the event of non-possession of identity papers, the unit of certification must help the worker to obtain them.</p> <p>Acknowledging that the P&C requires socialization of the child protection policy to everyone, consider conducting in-depth training, especially to those who are in contact with children (including workers and contractors). Ensure that all who are in contact with children are subjected to background checks.</p> <p>Consider conducting a child protection risk assessment to identify salient child protection issues.</p> <p>The company should have a governance and reporting structure in place to ensure proper implementation of the policy. """"</p>
402	6.4	<p>""""Gender discrimination must not be tolerated in the workplace. Labor law must be applied irrespective of an employee's origin or gender - or at least aim for this independence.</p> <p>The women welfare committee should include representatives from all positions/work type The committee member should allow the committee to be safe place for discussion with no discrimination related to the position of the participating member""</p> <p>"</p>

#	Indicator	Comment (English)
403	6.4	<p>"The unit of certification must be able to prove the identity and age of each worker - but without confiscating or withholding identity papers. In the event of non-possession of identity papers, the unit of certification must help the worker to obtain them.</p> <p>Acknowledging that the P&C requires socialization of the child protection policy to everyone, consider conducting in-depth training, especially to those who are in contact with children (including workers and contractors). Ensure that all who are in contact with children are subjected to background checks.</p> <p>Consider conducting a child protection risk assessment to identify salient child protection issues.</p> <p>The company should have a governance and reporting structure in place to ensure proper implementation of the policy."</p>
404	6.4	No repression of any kind will be tolerated by the unit of certification towards the workers or among workers
405	6.4	<p>"Input: Addition of indicators to criteria 6.4:</p> <p>Add ""Unit Certification Shall Prevent Child Labor by Setting Fair Working Target for the Workers and to Implement Dent Wage.""</p> <p>"</p>

#	Indicator	Comment (English)
406	6.4.1	<p>"[HRWG] Concern:</p> <ul style="list-style-type: none"> - Contradiction with national laws - Malaysia allows children to work at 16. Concern - this new threshold of no one below 18 years old may contradict local laws. - Apprenticeship' may be problematic - you can be an apprentice but due to lack of clarity, you may be undertaking similar work as those below 18 years old who have worked at the UoC previously. It may also be open to abuse and can lead to situations of forced labour. - Apprenticeship would mean that they are required to show some connection to education. This may be difficult to audit if apprenticeship is linked to education - How practical is this need for connection to education? How would this be monitored practically on the ground? Hazardous work should also consider work that is done in mills and upkeep work. Some may not be hazardous. Indonesia is just one country which classifies palm oil as hazardous work. This would not be a problem for the big Malaysian plantations due to the reliance on migrant workers. However, caution to not forget about the supply chain as we have to consider the smallholders as well. <p>Recommendation: Follow the ILO standard age in general because it is accepted by most countries. Clarify that UoC can adopt national law or international, depending on which is higher. Concern should be given to the children currently working because the higher requirement imposed will have repercussions on the many young workers already employed in the field. "</p>
407	6.4.1	<p>"Opportunities for workers (training, promotion, raises, etc.) should be linked only to individual performance, and should not be conditioned by origin or gender.</p> <p>A policy must be defined in this respect, with clear, auditable indicators and criteria to justify any opportunities."</p>
408	6.4.1	<p>Penalties must also be clearly defined by the RSPO in the event of failure to meet these criteria - including temporary or permanent suspension of membership in the case of serious infringements.</p>
409	6.4.1	<p>"A taskforce is to be set up to define guidelines to help mills define and implement this policy – regarding national laws"</p>
410	6.4.1	<p>Penalties must also be clearly defined by the RSPO in the event of failure to meet these criteria - including temporary or permanent suspension of membership in the case of serious infringements.</p>
411	6.4.1	<p>"A taskforce is to be set up to define guidelines to help mills define and implement this policy - and made it available for verification</p> <p>Need to ensure access to education to workers' children from early childhood until mandatory minimum school age set by national government.</p> <p>Penalties must also be clearly defined by the RSPO in the event of failure to meet these criteria - including temporary or permanent suspension of membership in the case of serious infringements."</p>

#	Indicator	Comment (English)
412	6.4.1	"Multi-stakeholder guidelines should be issued to mills to help them mitigate problems in the workplace - as well as sanctions for non-compliance. "
413	6.4.1	"A taskforce is to be set up to define guidelines to help mills define and implement this policy - and made it available for verification Need to ensure access to education to workers' children from early childhood until mandatory minimum school age set by national government. Penalties must also be clearly defined by the RSPO in the event of failure to meet these criteria - including temporary or permanent suspension of membership in the case of serious infringements."
414	6.4.1	"Multi-stakeholder guidelines should be issued to mills to help them mitigate problems in the workplace - as well as sanctions for non-compliance. Opportunities for workers (training, promotion, raises, etc.) should be linked only to individual performance, and should not be conditioned by origin or gender. A policy must be defined in this respect, with clear, auditable indicators and criteria to justify any opportunities. Committee requests are taken into account by the company - with a clear timeline for implementation of validated requests. Any request not validated must be clearly and explicitly justified - with a clear timeline for implementation of the request if the conditions requested by the company are met."
415	6.4.1	"The indicator is deleted because it has been covered by Indicator 6.1.1. related to discrimination"

#	Indicator	Comment (English)
416	6.4.1	<p>"Enter/addition:</p> <ol style="list-style-type: none"> 1. In the definition of RSPO (source) ILO Conventions Convention C184 2001 Concerning Safety and Health in Agriculture Convention 2001 - Types of work that are endangering K3, may not be under 18 years, unless determined different from by national regulations and regulations or competent authority, and Consultation with worker representatives, can employ young workers aged 16 years by first getting training. 2. Children's Schools, the company should provide school facilities and participate in supervising and ensuring that workers' children are required to attend schools from elementary to high school, so there are no more child labor or providing transportation or children's facilities to attend school 3. The company has a definition of which area is dangerous and not, so that the company does not exploit internship workers "
417	6.4.2	<p>"[HRSS] Proposal"" 6.4.2(C) The Unit of Certification shall not employ workers below the age of 15. An age screening verification procedure shall be documented.""</p> <p>To align the indicator with ILO's requirements which allow those under 15 to be able to conduct non-hazardous work."</p>
418	6.4.2	6.4.2 What about the verification procedure for contractors' workers?
419	6.4.2	<p>"Multi-stakeholder guidelines should be issued to mills to help them mitigate problems in the workplace - as well as sanctions for non-compliance.</p> <p>Opportunities for workers (training, promotion, raises, etc.) should be linked only to individual performance, and should not be conditioned by origin or gender.</p> <p>A policy must be defined in this respect, with clear, auditable indicators and criteria to justify any opportunities.</p> <p>Committee requests are taken into account by the company - with a clear timeline for implementation of validated requests.</p> <p>Any request not validated must be clearly and explicitly justified - with a clear timeline for implementation of the request if the conditions requested by the company are met."</p>
420	6.4.2	and made available for verification

#	Indicator	Comment (English)
421	6.4.2	<p>"Multi-stakeholder guidelines should be issued to mills to help them mitigate problems in the workplace - as well as sanctions for non-compliance.</p> <p>Opportunities for workers (training, promotion, raises, etc.) should be linked only to individual performance, and should not be conditioned by origin or gender. A policy must be defined in this respect, with clear, auditable indicators and criteria to justify any opportunities.</p> <p>Committee requests are taken into account by the company - with a clear timeline for implementation of validated requests. Any request not validated must be clearly and explicitly justified - with a clear timeline for implementation of the request if the conditions requested by the company are met."</p>
422	6.4.2	<p>""A taskforce is to be set up to define guidelines to help mills define and implement this policy.</p> <p>Ensure access to education to workers' children from early childhood until mandatory minimum school age set by national government."" "</p>
423	6.4.2	<p>"A taskforce is to be set up to define guidelines to help mills define and implement this policy - and made it available for verification</p> <p>Need to ensure access to education to workers' children from early childhood until mandatory minimum school age set by national government.</p> <p>Penalties must also be clearly defined by the RSPO in the event of failure to meet these criteria - including temporary or permanent suspension of membership in the case of serious infringements."</p>
424	6.4.2	A taskforce is to be set up to define guidelines to help mills define and implement this policy – regarding national laws
425	6.4.2	It is suggested that, if national laws allow to hire young workers, complying with the legal framework and protecting their development, it is possible to do so.
426	6.4.2	It could be done as long as the national regulation of each country is fulfilled.
427	6.4.2	Proposal "The UDC will use workers complying with the minimum age required by the legal framework of each country." Review writing
428	6.4.2	6.2.4 If not used under 18; Why a Poe to verify age?; That is, it is already a "rule" not to hire them, since in order to make a contract, the identification document is requested that accredits it as of legal age ...

#	Indicator	Comment (English)
429	6.4.2	There are cases in which minors can be hired; for example, "interns or practitioners"; So, it could be that its hiring is made with adherence to national legislation.
430	6.4.3	reword punishment to sanction.
431	6.4.3	"and made available for verification "
432	6.4.3	Multi-stakeholder guidelines should be issued to mills to help them mitigate problems in the workplace - as well as sanctions for non-compliance.
433	6.4.3	"A taskforce is to be set up to define guidelines to help mills define and implement this policy. Ensure access to education to workers' children from early childhood until mandatory minimum school age set by national government."
434	6.4.3	6.4.3 C It shall not become an apprentice until that child has completed compulsory school years (under 18 year old)
435	6.4.3	"In indicator 6.4.3 it is proposed to delete the phrase ""Internship Participants must get paid and given a salary slip. ""Referring to national regulations."
436	6.4.3	"6.4.3 To be consistent using the term ""Young People"", not ""Young Worker"" For the context of Indonesia, the internship does not get payments like regular workers because this is part of the process or educational requirements, not in the context of working. They are likely to get an allowance/transportation money which is determined by the company. That way the indicator requirements section 6.4.3 related to the payment of apprenticeship activities should be abolished"
437	6.4.3	"Indicator 6.4.3 (c) Proposed: Removing the phrase ""Internship participants must get paid and given a salary slip. "" refer to national regulations."
438	6.4.3	"Delete the phrase ""Internship Participants must get paid and given a salary slip. ""Referring to national regulations."
439	6.4.3	"Indicator 6.4.3 (c) Proposed to: The sentence ""Internship Participants must get paid and given a salary slip ""deleted referring to national regulations."

#	Indicator	Comment (English)
440	6.4.3	"[I] 6.4.3 Delete the phrase ""Internship Participants must get paid and given a salary slip. ""Referring to national regulations."
441	6.4.3	"Delete the phrase ""Internship Participants must get paid and given a salary slip. ""Referring to national regulations."
442	6.4.3	" Proposed Indicator 6.4.3: Delete the phrase ""Internship Participants must get paid and given a salary slip. ""Referring to national regulations."
443	6.4.3	"Proposed changes in indicators 6.4.3 (c) Internship opportunities for young workers over the age of 15 years and under the age of 18 for educational and training purposes are permitted under supervision. Internship activities for young workers should not interfere with school activities and should not endanger their health or development. Comment: Payment of wages to apprentice workers is not based and there is no reference. It is better if it is enough with the provisions in the company"
444	6.4.3	"Proposed Improvement of Indicators 6.4.3: Removing the phrase ""Internship Participants must get paid and given a salary slip."". The arrangement of internship workers refers to national regulations."
445	6.4.3	"Delete the phrase ""Internship Participants must get paid and given a salary slip. ""Referring to national regulations."
446	6.4.3	"The phrase ""Internship Participants must get paid and given a salary slip. "" added ""according to regulations National Yenag applies. "
447	6.4.3	6.4.3: The phrase "Internship participants must get paid and given a salary slip." added "In accordance with the national regulation in force."
448	6.4.3	"Ussulan 6.4.3: Delete the phrase ""Internship Participants must get paid and given a salary slip. ""Referring to national regulations."
449	6.4.3	Removing the phrase "Internship participants must get paid and given a salary slip."
450	6.4.3	Refer to detable of payrolls "and not" payroll "based on the fact that they are not own of the personnel plant but enter a learning phase and the payment corresponds to support and not with a salary payment."

#	Indicator	Comment (English)
451	6.4.3	Complement, according to the national regulations of each country.
452	6.4.4	6.4.4 If child labor is found, the unit should be suspended and remediation monitored. Legal repercussion should also be explored.
453	6.4.4	6.4.3 How would this indicator handle individuals between the ages of 16 and 18 who are not schooling, but require an income to sustain themselves? There should be evidence provided that these young workers are being trained specifically for certain employment and a certain plan should be made available, if relevant.
454	6.4.4	<p>"Multi-stakeholder guidelines should be issued to mills to help them mitigate problems in the workplace - as well as sanctions for non-compliance.</p> <p>Opportunities for workers (training, promotion, raises, etc.) should be linked only to individual performance, and should not be conditioned by origin or gender. A policy must be defined in this respect, with clear, auditable indicators and criteria to justify any opportunities.</p> <p>Committee requests are taken into account by the company - with a clear timeline for implementation of validated requests. Any request not validated must be clearly and explicitly justified - with a clear timeline for implementation of the request if the conditions requested by the company are met."</p>
455	6.4.4	<p>"Opportunities for workers (training, promotion, raises, etc.) should be linked only to individual performance, and should not be conditioned by origin or gender. A policy must be defined in this respect, with clear, auditable indicators and criteria to justify any opportunities."</p>
456	6.4.4	Multi-stakeholder guidelines should be issued to mills to help them mitigate problems in the workplace - as well as sanctions for non-compliance.
457	6.4.4	and made available for verification
458	6.5	<p>"Gender discrimination must not be tolerated in the workplace. Labor law must be applied irrespective of an employee's origin or gender - or at least aim for this independence.</p> <p>The women welfare committee should include representatives from all positions/work type The committee member should allow the committee to be safe place for discussion with no discrimination related to the position of the participating member"</p>

#	Indicator	Comment (English)
459	6.5	<p>"The unit of certification must be able to prove the identity and age of each worker - but without confiscating or withholding identity papers.</p> <p>In the event of non-possession of identity papers, the unit of certification must help the worker to obtain them.</p> <p>Acknowledging that the P&C requires socialization of the child protection policy to everyone, consider conducting in-depth training, especially to those who are in contact with children (including workers and contractors). Ensure that all who are in contact with children are subjected to background checks.</p> <p>Consider conducting a child protection risk assessment to identify salient child protection issues.</p> <p>The company should have a governance and reporting structure in place to ensure proper implementation of the policy."</p>
460	6.5	<p>"Gender discrimination must not be tolerated in the workplace.</p> <p>Labor law must be applied irrespective of an employee's origin or gender - or at least aim for this independence.</p> <p>The women welfare committee should include representatives from all positions/work type</p> <p>The committee member should allow the committee to be safe place for discussion with no discrimination related to the position of the participating member"</p>
461	6.5	<p>"Input:</p> <p>Addition of indicators to criteria 6.5:</p> <p>Add ""If Domestic Violence Towards Workers is found in the unit certification, unit Certification shall provide adequate discretion for the workers to settle the domestic violence.</p> <p>Note: Example of Discretion: to Provide Permits for the Workers/Victims to Go To Hospital, Police Department, Legal Aid Office, Therapy Session, etc.</p> <p>"</p>
462	6.5.1	6.5.1 This should also include contractors.
463	6.5.1	<p>"A taskforce is to be set up to define guidelines to help mills define and implement this policy - and made it available for verification</p> <p>Need to ensure access to education to workers' children from early childhood until mandatory minimum school age set by national government.</p> <p>Penalties must also be clearly defined by the RSPO in the event of failure to meet these criteria - including temporary or permanent suspension of membership in the case of serious infringements."</p>

#	Indicator	Comment (English)
464	6.5.1	<p>"A taskforce is to be set up to define guidelines to help mills define and implement this policy - and made it available for verification</p> <p>Need to ensure access to education to workers' children from early childhood until mandatory minimum school age set by national government.</p> <p>Penalties must also be clearly defined by the RSPO in the event of failure to meet these criteria - including temporary or permanent suspension of membership in the case of serious infringements."</p>
465	6.5.1	<p>"A taskforce is to be set up to define guidelines to help mills define and implement this policy.</p> <p>Ensure access to education to workers' children from early childhood until mandatory minimum school age set by national government."</p>
466	6.5.1	<p>Opportunities for workers (training, promotion, raises, etc.) should be linked only to individual performance, and should not be conditioned by origin or gender. A policy must be defined in this respect, with clear, auditable indicators and criteria to justify any opportunities.</p>
467	6.5.1	<p>"Multi-stakeholder guidelines should be issued to mills to help them mitigate problems in the workplace - as well as sanctions for non-compliance.</p> <p>Opportunities for workers (training, promotion, raises, etc.) should be linked only to individual performance, and should not be conditioned by origin or gender.</p> <p>A policy must be defined in this respect, with clear, auditable indicators and criteria to justify any opportunities.</p> <p>Committee requests are taken into account by the company - with a clear timeline for implementation of validated requests.</p> <p>Any request not validated must be clearly and explicitly justified - with a clear timeline for implementation of the request if the conditions requested by the company are met."</p>
468	6.5.1	<p>"No repression of any kind will be tolerated by the unit of certification towards the workers.</p> <p>Discussion forums must be set up between employee representatives and the company to promote conflict management, improve company life or simply comply with the law."</p>
469	6.5.1	6.5.1 C There is a Guidelines for Preventing and Handling Sexual Violence in the Workplace, kindly refer to that
470	6.5.1	<p>"Proposal 6.5.1</p> <p>The word sentence is corrected into sanctions. This is because the company has no right to punish individuals"</p>

#	Indicator	Comment (English)
471	6.5.1	"OSDV: Using the term sanctions not punishment because the company has no right to punish individuals "
472	6.5.1	In indicators 6.5.1 The term "punishment" is proposed to be "sanctions" because the company has no right to punish individuals
473	6.5.1	"Indicator 6.5.1 (c) Proposed: use the term sanctions not punishment because the company has no right to punish individuals "
474	6.5.1	use the term sanctions not punishment because the company has no right to punish individuals
475	6.5.1	Indicator 6.5.1 (c) is proposed to: Using the term "sanctions" not "punishment" because the company has no right to punish individuals.
476	6.5.1	"The word ""punishment"" is changed to ""sanctions"" because the company has no right to punish individuals, and What will determine the penalty is a court."
477	6.5.1	use the term sanctions not punishment because the company has no right to punish individuals
478	6.5.1	Indicator 6.5.1 (c) is proposed to: Using the term "sanctions" not "punishment" because the company has no right to punish individuals.
479	6.5.1	Indicator 6.5.1 (c) is proposed to: Using the term "sanctions" not "punishment" because the company has no right to punish individuals.
480	6.5.1	"RSPO 6.5.1 The term used is sanction not punishment because the company has no right to punish individuals"
481	6.5.1	"Notes: 1. Procedure for resolving sexual violence that has been running so far is still wrong, so it needs to be improved, it may be assisted from external parties to resolve sensitive cases (not resolved by management), so that victims do not become victims 2. explained and prepared the mechanism for handling and also recovery 3. The existence of a good handling system and the perspective of victims 4. When determining the independent team that helps the settlement is not directly appointed by the company directly to the authorities, but also communicates with labor unions to determine who will help complete"
482	6.5.1	The word "punishment" is changed to "sanctions" because the company has no right to punish individuals.

#	Indicator	Comment (English)
483	6.5.1	6.5.1: The word "punishment" is changed to "sanctions" because the company has no right to punish individuals, and those who will determine the sentence are courts.
484	6.6	<p>"The unit of certification must be able to prove the identity and age of each worker - but without confiscating or withholding identity papers. In the event of non-possession of identity papers, the unit of certification must help the worker to obtain them.</p> <p>Acknowledging that the P&C requires socialization of the child protection policy to everyone, consider conducting in-depth training, especially to those who are in contact with children (including workers and contractors). Ensure that all who are in contact with children are subjected to background checks.</p> <p>Consider conducting a child protection risk assessment to identify salient child protection issues.</p> <p>The company should have a governance and reporting structure in place to ensure proper implementation of the policy."</p>
485	6.6	<p>"The unit of certification must be able to prove the identity and age of each worker - but without confiscating or withholding identity papers.</p> <p>""In the event of non-possession of identity papers, the unit of certification must help the worker to obtain them.</p> <p>Acknowledging that the P&C requires socialization of the child protection policy to everyone, consider conducting in-depth training, especially to those who are in contact with children (including workers and contractors). Ensure that all who are in contact with children are subjected to background checks.</p> <p>Consider conducting a child protection risk assessment to identify salient child protection issues.</p> <p>The company should have a governance and reporting structure in place to ensure proper implementation of the policy. """"</p>

#	Indicator	Comment (English)
486	6.6	<p>"The unit of certification must be able to prove the identity and age of each worker - but without confiscating or withholding identity papers. In the event of non-possession of identity papers, the unit of certification must help the worker to obtain them.</p> <p>Acknowledging that the P&C requires socialization of the child protection policy to everyone, consider conducting in-depth training, especially to those who are in contact with children (including workers and contractors). Ensure that all who are in contact with children are subjected to background checks.</p> <p>Consider conducting a child protection risk assessment to identify salient child protection issues.</p> <p>The company should have a governance and reporting structure in place to ensure proper implementation of the policy."</p>

#	Indicator	Comment (English)
487	6.6	<p>""The unit of certification must be able to prove the identity and age of each worker - but without confiscating or withholding identity papers.</p> <p>""In the event of non-possession of identity papers, the unit of certification must help the worker to obtain them.</p> <p>Acknowledging that the P&C requires socialization of the child protection policy to everyone, consider conducting in-depth training, especially to those who are in contact with children (including workers and contractors). Ensure that all who are in contact with children are subjected to background checks.</p> <p>Consider conducting a child protection risk assessment to identify salient child protection issues.</p> <p>The company should have a governance and reporting structure in place to ensure proper implementation of the policy. """"""</p> <p>"</p>

#	Indicator	Comment (English)
488	6.6	<p>"The unit of certification must be able to prove the identity and age of each worker - but without confiscating or withholding identity papers. In the event of non-possession of identity papers, the unit of certification must help the worker to obtain them.</p> <p>Acknowledging that the P&C requires socialization of the child protection policy to everyone, consider conducting in-depth training, especially to those who are in contact with children (including workers and contractors). Ensure that all who are in contact with children are subjected to background checks.</p> <p>Consider conducting a child protection risk assessment to identify salient child protection issues.</p> <p>The company should have a governance and reporting structure in place to ensure proper implementation of the policy."</p>
489	6.6	<p>"Gender discrimination must not be tolerated in the workplace. Labor law must be applied irrespective of an employee's origin or gender - or at least aim for this independence.</p> <p>The women welfare committee should include representatives from all positions/work type The committee member should allow the committee to be safe place for discussion with no discrimination related to the position of the participating member"</p>
490	6.6	<p>"The unit of certification must be able to prove the identity and age of each worker - but without confiscating or withholding identity papers. In the event of non-possession of identity papers, the unit of certification must help the worker to obtain them.</p> <p>Acknowledging that the P&C requires socialization of the child protection policy to everyone, consider conducting in-depth training, especially to those who are in contact with children (including workers and contractors). Ensure that all who are in contact with children are subjected to background checks.</p> <p>Consider conducting a child protection risk assessment to identify salient child protection issues.</p> <p>The company should have a governance and reporting structure in place to ensure proper implementation of the policy."</p>

#	Indicator	Comment (English)
491	6.6	<p>"Gender discrimination must not be tolerated in the workplace. Labor law must be applied irrespective of an employee's origin or gender - or at least aim for this independence. The women welfare committee should include representatives from all positions/work type The committee member should allow the committee to be safe place for discussion with no discrimination related to the position of the participating member"</p>
492	6.6	<p>"The unit of certification must be able to prove the identity and age of each worker - but without confiscating or withholding identity papers. In the event of non-possession of identity papers, the unit of certification must help the worker to obtain them.</p> <p>Acknowledging that the P&C requires socialization of the child protection policy to everyone, consider conducting in-depth training, especially to those who are in contact with children (including workers and contractors). Ensure that all who are in contact with children are subjected to background checks.</p> <p>Consider conducting a child protection risk assessment to identify salient child protection issues.</p> <p>The company should have a governance and reporting structure in place to ensure proper implementation of the policy."</p>
493	6.6	<p>"Gender discrimination must not be tolerated in the workplace. Labor law must be applied irrespective of an employee's origin or gender - or at least aim for this independence.</p> <p>The women welfare committee should include representatives from all positions/work type The committee member should allow the committee to be safe place for discussion with no discrimination related to the position of the participating member"</p>
494	6.6	<p>"Multi-stakeholder guidelines should be issued to mills to help them mitigate problems in the workplace - as well as sanctions for non-compliance.</p> <p>Opportunities for workers (training, promotion, raises, etc.) should be linked only to individual performance, and should not be conditioned by origin or gender. A policy must be defined in this respect, with clear, auditable indicators and criteria to justify any opportunities.</p> <p>Committee requests are taken into account by the company - with a clear timeline for implementation of validated requests. Any request not validated must be clearly and explicitly justified - with a clear timeline for implementation of the request if the conditions requested by the company are met."</p>

#	Indicator	Comment (English)
495	6.6	<p>"Input: Addition of indicators to criteria 6.6:</p> <p>Add ""Unit Certification Fulfills Specific Rights of Women Workers, as Stipulated in the National Regulation or Above"".</p> <p>Note: Example of the Rights: Menstruation Leave, Maternity Leave, Caregivers Leave.</p> <p>Add ""women workers who are a breadwinner, due to any cause, shall receive equal wages and benefits with "</p>
496	6.6.1	<p>"6.6.1.C add the issues of women worker rights such as 1. to end any discrimination, including stereotypes, that undermine access to ""decent work"" , 2. Equality, end of low pay and to end the absence of equal pay , 3. Need recognition, equal distribution and value of care work and 4. a policy to end violence and harassment against women"</p>
497	6.6.1	<p>propose to combine this indicator to 6.1.2 as this same topics for training and development</p>
498	6.6.1	<p>"[HRWG] Negative effects of child labour should be communicated but this raises questions on what this would practically look like.</p> <p>There is no harm in ensuring this communication and other community outreach on these issues. But it should be included in the communication with the surrounding communities. However, how will auditors verify this?</p> <p>Recommendation: Add the word 'education' or 'facilitating education for the community on the issues of child labour'"</p>
499	6.6.1	<p>"A taskforce is to be set up to define guidelines to help mills define and implement this policy - and made it available for verification Need to ensure access to education to workers' children from early childhood until mandatory minimum school age set by national government. Penalties must also be clearly defined by the RSPO in the event of failure to meet these criteria - including temporary or permanent suspension of membership in the case of serious infringements."</p>
500	6.6.1	<p>"A taskforce is to be set up to define guidelines to help mills define and implement this policy - and made it available for verification Need to ensure access to education to workers' children from early childhood until mandatory minimum school age set by national government. Penalties must also be clearly defined by the RSPO in the event of failure to meet these criteria - including temporary or permanent suspension of membership in the case of serious infringements."</p>

#	Indicator	Comment (English)
501	6.6.1	Multi-stakeholder guidelines should be issued to mills to help them mitigate problems in the workplace - as well as sanctions for non-compliance.
502	6.6.1	"A taskforce is to be set up to define guidelines to help mills define and implement this policy - and made it available for verification Need to ensure access to education to workers' children from early childhood until mandatory minimum school age set by national government. Penalties must also be clearly defined by the RSPO in the event of failure to meet these criteria - including temporary or permanent suspension of membership in the case of serious infringements."
503	6.6.1	Multi-stakeholder guidelines should be issued to mills to help them mitigate problems in the workplace - as well as sanctions for non-compliance.
504	6.6.1	A taskforce is to be set up to define guidelines to help mills define and implement this policy – regarding national laws
505	6.6.1	"Multi-stakeholder guidelines should be issued to mills to help them mitigate problems in the workplace - as well as sanctions for non-compliance."
506	6.6.1	Need to pay attention to Sexual and Reproductive Health and Rights (SRHR) and ILO Convention 183.
507	6.6.1	"The involvement of women in the assessment of the risk of their work, not only involves men (6.6 and 6.7) Additional for definitions: Recruitment costs cover internal recruitment (in countries) and external (between countries). For travel costs, the company is borne after the candidate passes the selection "
508	6.6.1	Add: menstrual leave rights
509	6.6.1	It is suggested to leave only a gender committee in which the women's well-being issues are discussed, and not that there is a well-being committee
510	6.6.2	A taskforce is to be set up to define guidelines to help mills define and implement this policy – regarding national laws
511	6.6.2	The correct document reference is "RSPO Guidance on Child Right". Suggest aligning the document name to avoid misperception in referencing document.

#	Indicator	Comment (English)
512	6.6.2	<p>"Multi-stakeholder guidelines should be issued to mills to help them mitigate problems in the workplace - as well as sanctions for non-compliance.</p> <p>Opportunities for workers (training, promotion, raises, etc.) should be linked only to individual performance, and should not be conditioned by origin or gender. A policy must be defined in this respect, with clear, auditable indicators and criteria to justify any opportunities.</p> <p>Committee requests are taken into account by the company - with a clear timeline for implementation of validated requests. Any request not validated must be clearly and explicitly justified - with a clear timeline for implementation of the request if the conditions requested by the company are met."</p>
513	6.6.2	<p>"Penalties must also be clearly defined by the RSPO in the event of failure to meet these criteria - including temporary or permanent suspension of membership in the case of serious infringements."</p>
514	6.6.2	<p>"Multi-stakeholder guidelines should be issued to mills to help them mitigate problems in the workplace - as well as sanctions for non-compliance.</p> <p>Opportunities for workers (training, promotion, raises, etc.) should be linked only to individual performance, and should not be conditioned by origin or gender. A policy must be defined in this respect, with clear, auditable indicators and criteria to justify any opportunities.</p> <p>Committee requests are taken into account by the company - with a clear timeline for implementation of validated requests. Any request not validated must be clearly and explicitly justified - with a clear timeline for implementation of the request if the conditions requested by the company are met."</p>
515	6.6.2	<p>In the 6.6.2 indicator it is proposed to be deleted, because it is redundant with 6.1.2 related to the same opportunity for workers</p>
516	6.6.2	<p>Proposed 6.6.2: This indicator is deleted, because it is redundant with 6.1.2 related to the same opportunity for workers.</p>
517	6.6.2	<p>"Welfare Welfare and Empowerment Committee consisting of women only and is in the shade Gender Committee."</p>
518	6.6.2	<p>"The indicator is deleted because it has been covered by Indicator 6.1.1. related to discrimination."</p>

#	Indicator	Comment (English)
519	6.6.2	"Indicator 6.6.2 Proposed: This indicator is deleted, because it is redundant with 6.1.2 related to the same opportunity for workers"
520	6.6.2	Indicator 6.6.2 This indicator is removed, because it is redundant with 6.1.2 related to the same opportunity for workers
521	6.6.2	"Proposal: This indicator is deleted, because it is redundant with 6.1.2 related to the same opportunity for workers"
522	6.6.2	"[I] 6.6.2 This indicator is deleted, because it is redundant with 6.1.2 related to the same opportunity for workers"
523	6.6.2	Indicator 6.6.2 is proposed in order to: This indicator is deleted, because it is redundant with 6.1.2 related to the same opportunity for workers.
524	6.6.2	"Proposal: Indicator 6.6.2 is deleted, due to redundant with 6.1.2 related to the same opportunity for workers"
525	6.6.2	6.6.2: The indicator is deleted because it has been covered by indicators 6.1.1. related to discrimination.
526	6.6.2	This indicator is deleted, because it is redundant with 6.1.2 related to the same opportunity for workers
527	6.6.2	This indicator is deleted, because it is redundant with 6.1.2 related to the same opportunity for workers
528	6.6.2	Delete indicators 6.6.2 due to repetition with 6.1.2 related to the same opportunity for workers
529	6.6.2	This indicator is deleted, because it is redundant with 6.1.2 related to the same opportunity for workers
530	6.6.2	Indicator 6.6.2 Proposed: This indicator is proposed to be deleted, because it is redundant with 6.1.2 related to the same opportunity for workers.
531	6.6.2	"Proposed 6.6.2: The sentence in the indicator needs to be clarified the relationship of the gender committee with the Welfare Committee. and relations with the female committee ... it can be ambiguous."
532	6.6.3	Guidelines resulting from multi-stakeholder collaborative work are to be produced within the RSPO to help companies express and implement their particular needs for pregnant women and new mothers.

#	Indicator	Comment (English)
533	6.6.3	<p>"[HRSS] Propose to add ""The Unit of Certification shall develop and implement policies and procedures on the prevention and remediation of:</p> <p>(a) forced labour as stated in ILO's 11 Indicators of Forced Labour (2012) and trafficking in persons.</p> <p>(b) Any payment made by workers related to the recruitment process as defined in the ILO General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs (2019);</p> <p>(c) Debt Bondage and wage withholding.</p> <p>These policies and procedures shall be made Publicly Available and socialised to all levels of the Workforce, suppliers and labour recruiters in languages understood by them.""</p> <p>It is necessary to add the ILO forced labour indicators to address any potential gaps in RSPO's standards. This is also to avoid trade barriers from EU and US."</p>
534	6.6.3	Does this mean 2 committees are needed, the 'Gender Committee' and the 'Women's welfare and Empowerment Committee'? What is the role of the Gender Committee in this case? If the Gender Committee fulfills all the requirements of the 'Women's welfare and Empowerment Committee', do we then still need both? More clarity is needed on the difference of both committees?
535	6.6.3	Recruitment processes must be clear and objective
536	6.6.3	"Recruitment processes must be clear and objective"
537	6.6.3	"Committee requests are taken into account by the company - with a clear timeline for implementation of validated requests. Any request not validated must be clearly and explicitly justified - with a clear timeline for implementation of the request if the conditions requested by the company are met."
538	6.6.3	Guidance for this indicator, "needs of employees who are pregnant" shall clarify and provide in details the needs that can be supported by UoC.
539	6.6.3	[Sandakan, 21 June 2023] What does it mean by legally mandated? Which rule are we referring to?
540	6.6.3	6.6.3 A women committee should focus on women rights issues , provide a safe environment for women to discuss current workplace, community & personal issues, otherwise it will be overwhelmed

#	Indicator	Comment (English)
541	6.6.3	<p>"Input</p> <ol style="list-style-type: none"> 1. In order not to be confusing, it is necessary to improve the term ""Welfare Committee and Women's Empowerment"" because it is part of the Gender Committee. So that both are not considered different committees. 2. The Welfare and Empowerment of Women's Empowerment Sub Committee indeed prioritizes female members, but also needs members other than women as a form of education for men. This can expand the prevention of sexual violence because all workers have a good understanding of gender. 3. The management of the Gender Committee is not dominated by management and there must be representatives of the union/representative of workers + people who have an influence in decision making 4. The period of the gender committee for meetings is every 3 months, not 4 months. <p>"</p>
542	6.6.3	<p>"notes:</p> <ol style="list-style-type: none"> 1. Add: Sanitation facilities are available ""in every radius of 3 km"". 2. Add Description: Sanitation facilities ""especially clean water flow"" things need to be written explicit and irreplaceable by 7.5.1."
543	6.6.3	<p>"Proposed Indicator 6.6.3: Revision of Translation: A Gender Committee Shall Be Established, which includes a Women's Welfare and Empowerment Committee. -> Gender Committee must be formed, which includes the Women's Empowerment Committee</p> <p>There is no need for a review because the gender committee consists of employees and female workers"</p>
544	6.6.3	The Welfare and Empowerment Committee for Women consists of women and is in the auspices of the Gender Committee.
545	6.6.3	It is complex to indicate that the Gender Committee is only made up of women, if they only want women to be called the Women letting participate in the committee where in theory I could participate
546	6.6.3	6.6.3 Define whether it is necessary to have a subcommittee of women, how working with the 2018 version
547	6.6.3	<p>"A committee within another committee, it is not better to indicate that the Gender Committee will address within its issues:</p> <ol style="list-style-type: none"> a) Welfare b) Empowerment of women"

#	Indicator	Comment (English)
548	6.6.3	<p>"6.6.3 About this indicator:</p> <ol style="list-style-type: none"> 1. If we talk about non -discrimination, why are other genres excluded in the Gender Committee? 2. Make too many committees not only hinders its implementation but also socialization towards interested parties (different representatives because we can have, for example: Ethics Committee, Coexistence Committee, Gender Committee and, now well -being committee for women) . This is confusing and there are objectives and functions that can be repetitive. 3. Why a well -being committee composed only of women?, Could be used to include men and other genres, to facilitate training, information and understanding, which reduces better coexistence. <p>"</p>
549	6.6.3	<p>Suggestion: a single committee, formed by different genres, who may have representatives of the UDEC and workers and treat sensitive issues that violate Human Rights ... One of their functions can be to promote these rights and train (train) to the different CONCERNED PARTIES.</p>
550	6.6.3	<p>It is suggested to leave only a gender committee in which the women's well -being issues are discussed, and not that there is a well -being committee</p>
551	6.6.3	<p>Only a gender committee such as the 2018 version should be left, for producers it is no longer viable to have too many committees, you should seek to be practical.</p>
552	6.6.3	<p>"Eliminate the word ""committee"" for the well -being and empowerment of women, The following wording is suggested ""a gender committee will be established that includes content and thematic for the well -being and empowerment of women"" Keep in mind that in national laws there are already the committees as in Colombia Labor Coexistence Committee where a group of workers in which it is sought to recognize and control the psychosocial risk or situations of workplace harassment in an organization is being worked on"</p>
553	6.6.3	<p>6.6.3 Define whether it is necessary to have a subcommittee of women, as working with the 2018 version. This change is really discrimination, rather the UDC must have cultural sensitivity to deal with complex issues in some realities</p>
554	6.6.4	<p>"Committee requests are taken into account by the company - with a clear timeline for implementation of validated requests. Any request not validated must be clearly and explicitly justified - with a clear timeline for implementation of the request if the conditions requested by the company are met."</p>
555	6.6.4	<p>"Gender discrimination must not be tolerated in the workplace. Labor law must be applied irrespective of an employee's origin or gender - or at least aim for this independence.</p> <p>The women welfare committee should include representatives from all positions/work type The committee member should allow the committee to be safe place for discussion with no discrimination related to the position of the participating member"</p>

#	Indicator	Comment (English)
556	6.6.4	6.6.4. What about situations where there is no legal mandate and consent is given by the worker as a health and safety precautionary measure? How is this handle? Would this be treated as a non-conformity?
557	6.6.5	Committee requests are taken into account by the company - with a clear timeline for implementation of validated requests. Any request not validated must be clearly and explicitly justified - with a clear timeline for implementation of the request if the conditions requested by the company are met.
558	6.6.5	Recruitment processes must be clear and objective
559	6.6.5	"In indicators 6.6.5 there are several proposals, namely: - Clarify the definition of the needs of pregnant/new female workers, adapted to national regulations - The sentence ""period six months before"" was abolished - Add the phrase ""in the scope of work""
560	6.6.5	"- Clarify the definition of the needs of pregnant/new female workers, adapted to national regulations - The sentence ""period six months before"" was abolished - Add the phrase ""in the scope of work""
561	6.6.5	"Indicator 6.65 Proposed: - Clarify the definition of the needs of pregnant/new female workers, adapted to national regulations - The sentence ""period six months before"" was abolished - Add the phrase ""in the scope of work""
562	6.6.5	"- Clarify the definition of the needs of pregnant/new female workers, adapted to national regulations - The sentence ""period six months before"" was abolished - Add the phrase ""in the scope of work""
563	6.6.5	"Indicator 6.6.5 is proposed to: 1. Claimed the definition of the needs of female workers who are pregnant/new, adjusted to national regulations. 2. The sentence ""period six months before"" was abolished. 3. Add the phrase ""in the scope of work""."
564	6.6.5	"- Clarify the definition of the needs of pregnant/new female workers, adapted to national regulations - The sentence ""period six months before"" was abolished - Add the phrase ""in the scope of work""
565	6.6.5	Proposed 6.6.5: (1). Clarify the definition of the needs of pregnant/new female workers, adjusted to national regulations, (2). The sentence "period six months before" was abolished, (3). Add the phrase "in the scope of work"

#	Indicator	Comment (English)
566	6.6.5	"Proposed 6.5.5 Changes in indicators are the needs of female workers who are pregnant/new, adjusted to the regulations and the applicable national law. "
567	6.6.5	"The phrase ""in the previous six months"" to be clarified. Maternity leave in Indonesia according to the provisions The Indonesian government was given for 3 months. "
568	6.6.5	Indicator 6.65 Proposal: - Clarify the definition of the needs of pregnant/new female workers, adjusted to the National Regulation - the sentence "the previous six months" is abolished - adding the phrase "within the scope of the work"
569	6.6.5	"Proposal: - Clarify the definition of the needs of pregnant/new female workers, adapted to national regulations - The sentence ""period six months before"" was abolished - Add the phrase ""in the scope of work"""
570	6.6.5	"[I] 6.6.5 - Clarify the definition of the needs of pregnant/new female workers, adapted to national regulations - The sentence ""period six months before"" was abolished - Add the phrase ""in the scope of work"""
571	6.6.5	"The definition of ""the needs of the middle female worker pregnant / new giving birth ""to be clarified and still deep in the scope of the work. "
572	6.6.5	"Proposed indicator 6.6.5: - Clarify the definition of the needs of pregnant/new female workers, adapted to national regulations - The sentence ""period six months before"" was abolished - Add the phrase ""in the scope of work"""
573	6.6.5	"6.6.5: Definition ""The need for female workers who are pregnant / new giving birth"" to be clarified and still in the scope of work. 6..6.5: The phrase ""in the previous six months"" to be clarified. Pregnant leave in Indonesia in accordance with the provisions of the Indonesian government is given for 3 months."

#	Indicator	Comment (English)
574	6.6.5	"- Clarify the definition of the needs of pregnant/new female workers, adapted to national regulations - The sentence ""period six months before"" was abolished - Add the phrase ""in the scope of work""
575	6.6.5	Gender Committee or Women's Welfare Committee, if the scope is with the woman I suggest that the indicator approach is "Women's Welfare Committee" and not "Gender Committee".
576	6.6.5	What is the scope of this attention? I suggest the wording of the 2018 version indicator. I consider that it is an issue to analyze in particular with each mother and that the process is not so long in case this new scope of the gender committee will be approved.
577	6.6.5	It is suggested to leave only a gender committee in which the women's well-being issues are discussed, and not that there is a well-being committee
578	6.6.5	Check the scope of the attention that should be given to the person, there are other means by which this support is given, such as Social Security for example.
579	6.7	""Guidelines resulting from multi-stakeholder collaborative work are to be produced within the RSPO Sanctions for any breaches must be provided for by the RSPO, up to and including suspension of the unit of certification and even compensation for individuals."" "
580	6.7	"Guidelines resulting from multi-stakeholder collaborative work are to be produced within the RSPO Sanctions for any breaches must be provided for by the RSPO, up to and including suspension of the unit of certification and even compensation for individuals."
581	6.7	"Guidelines resulting from multi-stakeholder collaborative work are to be produced within the RSPO Sanctions for any breaches must be provided for by the RSPO, up to and including suspension of the unit of certification and even compensation for individuals."
582	6.7	Remove the word "Any" and the payment as defined in ILO guidance.
583	6.7	Criteria 6.7 In general, indicators - indicators in the criteria 6.7 are too detailed. It is recommended to make the indicator to be more simple, where other detailed things are included in the guide only
584	6.7	Input in the form of adding editors to criteria 6.7 There is no tolerance for the practice of forced labor and human trafficking. Prevention, monitoring and remediation procedures are available.

#	Indicator	Comment (English)
585	6.7.1	<p>"Suggest to revise the indicator to clarify the role and responsibilities of the gender committee, and how the gender welfare and empowerment committee fits in the overall structure. The indicator could be re-worded: ' A gender committee, comprising of women's welfare and empowerment committee, shall be established specifically to raise awareness, identify and address issues of concern, as well as identify training opportunities and support for the women to fulfil their work'.</p> <p>[In the old indicator (6.1.5) A gender committee is in place, although in the draft2. A Gender Committee shall be established, which includes a women's welfare and empowerment committee. And the women's welfare and empowerment committee shall comprise women workers only. There is a confusion in this indicator because the indicator goes on to talk about the roles and responsibilities of the Women's Welfare and Empowerment Committee which responsibility is solely to look at women's welfare. The indicator no longer describes the role and responsibility of a gender community. What is a gender committee supposed to do?</p> <p>>There is no provision to provide any training or support to this new women's welfare and empowerment committee to do their job].</p> <p>"</p>
586	6.7.1	Guidelines resulting from multi-stakeholder collaborative work are to be produced within the RSPO to help companies express and implement their particular needs for pregnant women and new mothers.
587	6.7.1	"Guidelines resulting from multi-stakeholder collaborative work are to be produced within the RSPO to help companies express and implement their particular needs for pregnant women and new mothers."
588	6.7.1	No need to state "provide opportunity at least quarterly to discuss" but UoC provide opportunity for the women committee to organise meeting and the women committee decides the frequency of meeting. This is clearer from audit perspective.
589	6.7.1	[Sandakan, 21 June 2023] Leniency to MG. Propose to put a minimum number of women workers in the committee. Make this indicator applicable only to the UoC (MG) with significant number of women workers.
590	6.7.1	Proposed indicator 6.7.1 point B is removed because it is not relevant to the policy of forced labor.
591	6.7.1	<p>"Addition of editors to indicators 6.7.1 (c) into, the certification unit must prepare and implement policies and procedures regarding prevention, monitoring, and remediation to:</p> <p>(c) Ijon work and wage detention. There should be no work practices, wages, and wage cuts. These policies and procedures must be available to the public and socialized to all levels of labor, suppliers, and recruiters of workers in the language that they understand or use."</p>

#	Indicator	Comment (English)
592	6.7.1	"Input: 1. (c) There are conditions that have not been conditioned about wages (deduction of wages from companies to other parties to workers, because the company does not provide salaries directly to laborers) 2. The definition of forced labor and human trafficking is how (including the detention of documents and debt payments) 3. Subjective companies determine work targets, including the planting period, which requires workers to work exceeding the time limit to meet their targets. Because if the target is not achieved there will be a wage deduction and does not get their rights well. 4. Provision of work facilities that are suitable for needs "
593	6.7.1	6.7.1 Define the scope of suppliers, the scope is very extensive or define that the company sees its important or vulnerable suppliers.
594	6.7.1	6.7.1 Define the scope of suppliers, the scope is very extensive or define that the company sees its important or vulnerable suppliers.
595	6.7.1	The remediation process must have a clear methodology to investigate the existence or not of a payment, this is only subject to the worker's version.
596	6.7.1	Define the scope of the type of suppliers, if it is a supplier of FF, inputs, services etc.
597	6.7.1	[Abidjan WS] 6.7.1 'Debt bondage' should be based on national regulation. NI to provide guidance.
598	6.7.2	The addition of redkation in 6.7.2 (c), becomes, identity documents, passports, and work permits issued by the government must be stored by workers. If it is considered unsafe in independent storage, then this document can be given to the certification unit or its representatives appointed for legal or immigration purposes that are mandatory and must be returned as soon as possible. The certification unit must provide a safe document storage area for workers and must be accessible freely by workers.
599	6.7.2	6.7.2 (c) The word (safe place) does not context with the action that is being proposed.
600	6.7.2	6.7.2 The responsibility of the UDC increases for providing a place to save the documents
601	6.7.2	6.7.2 The responsibility of the UDC increases for counting a space to protect the documents.
602	6.7.2	The UDC is not due to the UDC to provide a safe place to save documents, they must carry or save each worker.
603	6.7.2	Remove the word safe place to save documents, although the rule is clear that the identification documents should not be retained.
604	6.7.3	The indicator should be removed as it seems like overlap/repetitive of indicator 6.5.1. or it can be replaced with 'Worker's freedom of movement and access to transport and communication should not be denied.'
605	6.7.3	[Accra WS] 6.7.3 define 'unfair work target' - this is hard to audit - what is considered unfair - benchmark needed on local level? The indicator should be There shall be no debt bondage and withholding of wages. These include the following: ...
606	6.7.3	iii) requires workers to pay a deposit or security deposit to the certification unit;

#	Indicator	Comment (English)
607	6.7.3	6.7.3 Change the word date for a period, since it is consistent with the contract, thus not having double interpretations, taking into account national legislation
608	6.7.3	iii) Define the word deposit better, since there are different ways of payment or accreditation of wages for the work carried out.
609	6.7.3	"Numeral I: change the word date for period, and include the note according to the national norm. Numeral II: clarify the concept referred to in the concept of ""deposit""
610	6.7.3	[Abidjan WS] 6.7.3 - defined 'unfair work target' - this will create interpretation issue .
611	6.7.4	The implementation of objectives consistent with technical and human feasibility, within an acceptable timeframe, must be guaranteed by the unit of certification. Additional objectives must also be integrated into this process, to avoid disguised forced labor.
612	6.7.4	"The 6.2.2/6.2.3/6.2.4 are about recruitment process and would sit better under 6.7. [> Some clarities are needed regarding remediation of fees whether or not there will be a cutoff date when fees (payment made by workers related to recruitment process) need to be remediated >Nothing to comment yet as RSPO Secretariat will issue a procedure for the repayment of costs incurred by workers in recruitment only December 2024]. "
613	6.7.4	In indicator 6.7.4 For the phrase "Total working hours must include rest and break time on working days, as determined in local law and/or national law, including a break time of at least 24 hours in a row every 7 days", because in the criteria This talks about overtime work. because it has been included in national law
614	6.7.4	"Proposal: The phrase ""Total working hours must include rest and break time on working days, as determined in local law and/or national law, including a break time of at least 24 hours in a row every period of 7 days"" , because in this criterion it talks about overtime work. because it has been included in national law"
615	6.7.4	The phrase "Total working hours must include rest and break time on working days, as determined in local law and/or national law, including a break time of at least 24 hours in a row every period of 7 days", because in this criterion it talks about overtime work. because it has been included in national law
616	6.7.4	"Proposed 6.7.4: Changes in indicators to: Overtime work must be carried out voluntarily and in accordance with local law and/or national law. Total working hours must include rest and break time on weekdays, as specified in local law and/or national law The phrase ""Total working hours must include rest and break time on working days, as determined in local law and/or national law, including a break time of at least 24 hours in a row every period of 7 days"" is abolished ... because it has been included in the sentence in the law national."

#	Indicator	Comment (English)
617	6.7.4	"Indicator 6.7.4 (c) Proposed: The phrase ""Total working hours must include rest and break time on working days, as determined in local law and/or national law, including a break time of at least 24 hours in a row every period of 7 days"" , because in this criterion it talks about overtime work. because it has been included in national law"
618	6.7.4	Indicator 6.7.4 (c) Proposed to: The phrase "Total working hours must include rest and break time on working days, as determined in local law and/or national law, including a break time of at least 24 consecutive hours every 7 days" , because in this criterion it talks about overtime work. Because it has been included in national law.
619	6.7.4	"[I] 6.7.4 The phrase ""Total working hours must include rest and break time on working days, as determined in local law and/or national law, including a break time of at least 24 hours in a row every period of 7 days"" , because in this criterion it talks about overtime work. because it has been included in national law"
620	6.7.4	6.7.4: The phrase "Total working hours must include rest and break time on working days, as determined in local law and/or national law, including a break time of at least 24 hours in a row every 7-day period" was removed because the provisions of overtime work have been determined by the Indonesian government.
621	6.7.4	Proposed changes in indicators 6.7.4: Overtime work must be carried out voluntarily and in accordance with local law and/or national law. Total working hours must include rest and break time on working days, as specified in local law and/or national law, including a break time of at least 24 hours in a row
622	6.7.4	The phrase "Total working hours must include rest and break time on working days, as determined in local law and/or national law, including a break time of at least 24 hours in a row every period of 7 days", because in this criterion it talks about overtime work. because it has been included in national law
623	6.7.4	"The phrase ""Total working hours must include rest and The break time on weekdays, as determined in local law and/or national law, including a break time of at least 24 hours in a row every 7-day period ""was removed because the provisions of overtime work had been determined by the Indonesian government."
624	6.7.4	"Proposed Indicator 6.7.4: The phrase ""Total working hours must include rest and break time on working days, as determined in local law and/or national law, including a break time of at least 24 hours in a row every period of 7 days"" , because in this criterion it talks about overtime work. because it has been included in national law"
625	6.7.4	Proposed 6.7.4: The phrase "Total working hours must include rest and break time on working days, as determined in local law and/or national law, including a break time of at least 24 consecutive hours every 7-day period" , because in this criterion Talking about overtime work. because it has been included in national law
626	6.7.4	6.7.4 To adhere to the national legislation of each country, with the working day.

#	Indicator	Comment (English)
627	6.7.4	6.7.4 To adhere to the national legislation of each country, with the working day.
628	6.7.4	6.7.4 Change the word arrangement or verify the English version, the legislation of each country is different with the work schedules according to the position that is defined.
629	6.7.4	"Check the word ""arrangement"" if it is because of Spanish translation, since it is misunderstood. The wording of the indicator should remain until the word ""working day"" and add that it is according to national legislation."
630	6.7.4	[Abidjan WS] 6.7.4 It should put specific requirement - it should be based on national regulation. Plus to remove the last two sentences.
631	6.7.5	6.7.5 How would the rights of international migrant workers be guaranteed here? There are situations where they cannot terminate their employment freely because of the employment permit issued by the government. Premature termination to work for other parties should also be considered.
632	6.7.5	6.7.5 Application of sanctions for certain things in the resignation process that has been agreed between workers and companies should be applied in this indicator
633	6.7.5	[Abidjan WS] 6.7.5 Removed the entire sentence of 'Penalty for not complying with notice period can only be enforced if it has been agreed in the employment contract.' - no need to specify this matter. How to audit?
634	6.7.6	6.7.6. This might not be possible for international migrant labor as this is not the normal practice in certain countries.
635	6.7.6	"The implementation of objectives consistent with technical and human feasibility, within an acceptable timeframe, must be guaranteed by the unit of certification. Additional objectives must also be integrated into this process, to avoid disguised forced labor. "
636	6.7.7	6.7.7. There should be guidelines on this because it has been made a critical indicator.
637	6.7.7	[Abidjan WS] 6.7.7 please clarify the role of UoC - is this for all workers or just workers residing in UoC? This will create multiple interpretation that UoC need to provide telephones, sim cards and even credits) to all workers. Access to transportation - does it mean the UoC need to provide all transports for local workers do not stay inside the plantation?
638	6.7.7	"Suggest to re-word the sentence: Overtime work shall be voluntary and shall be paid in accordance with local and/or national laws or sector agreements including with the trade union. Overtime shall be monitored. [Overtime work shall be voluntary and in accordance with local and/or National Laws]."
639	6.7.7	"and/or" -> "and" no need of "or"
640	6.7.7	The implementation of objectives consistent with technical and human feasibility, within an acceptable timeframe, must be guaranteed by the unit of certification. Additional objectives must also be integrated into this process, to avoid disguised forced labor.

#	Indicator	Comment (English)
641	6.7.7	"In indicator 6.7.7 the phrase ""transportation and/or communication restrictions should not be used as an action to enforce discipline"" to be removed because it causes multi interpretation. Whether the prohibition of using a cellphone in a particular station that can endanger the safety of workers and colleagues, including in the sense of restrictions"
642	6.7.7	"The phrase ""restrictions on transportation and/or communication should not be used as an action to enforce discipline"" to be removed because it causes multi interpretation. Whether the prohibition of using a cellphone in a particular station that can endanger the safety of workers and colleagues, including in the sense of restrictions"
643	6.7.7	"Proposal: The phrase ""restrictions on transportation and/or communication should not be used as an action to enforce discipline"" to be removed because it causes multi interpretation. Whether the prohibition of using a cellphone in a particular station that can endanger the safety of workers and colleagues, including in the sense of restrictions"
644	6.7.7	Proposed indicator 6.7.7 The sentence "transportation restrictions and/or communication should not be used as an action to enforce discipline" to be removed because it causes multi interpretation. Whether the prohibition of using a cellphone in a particular station that can endanger the safety of workers and colleagues, including in the sense of restrictions
645	6.7.7	Proposed Indicator 6.7.7: The phrase "Limitation of transportation and/or communication should not be used as an action to enforce discipline" is removed because it causes unclear and multi -interpretation in the application and audit.
646	6.7.7	"Cause multiple interpretations, whether by providing parking space and prohibition using cellphones in certain stations that can endanger the safety of workers and their colleagues, including in the sense of restrictions This sentence is deleted: Transportation and/or communication restrictions should not be used as an action to enforce discipline."
647	6.7.7	Indicator 6.7.7 (c) is proposed in order to: The phrase "restrictions on transportation and/or communication should not be used as an action to enforce discipline" to be removed because it causes multi interpretation.
648	6.7.7	"Indicator 6.7.7 (c) Proposed: The phrase ""restrictions on transportation and/or communication should not be used as an action to enforce discipline"" to be removed because it causes multi interpretation."

#	Indicator	Comment (English)
649	6.7.7	"[I] 6.7.7 The phrase ""restrictions on transportation and/or communication should not be used as an action to enforce discipline"" to be removed because it causes multi interpretation. Whether the prohibition of using a cellphone in a particular station that can endanger the safety of workers and colleagues, including in the sense of restrictions"
650	6.7.7	"The phrase ""restrictions on transportation and/or communication should not be used as an action to enforce discipline"" to be removed because it causes multi interpretation. Whether the prohibition of using a cellphone in a particular station that can endanger the safety of workers and colleagues, including in the sense of restrictions"
651	6.7.7	"Proposed indicator 6.7.7: The phrase ""restrictions on transportation and/or communication should not be used as an action to enforce discipline"" to be removed because it causes multi interpretation. "
652	6.7.7	Proposed Indicator Improvement 6.7.7: Workers have access to transportation and/or communication (cellphones, SIM cards, pulses).
653	6.7.7	"Proposed 6.7.7: Proposal: The phrase ""Limitation of transportation and/or communication should not be used as an action to enforce discipline"" to be removed because it causes multi interpretation. Whether the prohibition of using a cellphone in a particular station that can endanger the safety of workers and colleagues, including in the sense of restrictions"
654	6.7.7	It is not clear the scope of this indicator, subjectivity in its implementation and auditability.
655	6.7.7	6.7.7 Clarify the indicator since it is not viable with the accesses that are requested (phones, SIM cards, credits)
656	6.7.7	Define the scope in terms of transport and communications.
657	6.7.7	It is suggested to clarify the scope, referred to with access to communication and transportation
658	6.7.7	Define the scope of the indicator, since it is provided for multiple interpretations, (which is the obligation of the company to provide the worker).
659	6.7.7	[Abidjan WS] 6.7.7 Access to transportation and communication - requirement is too wide and leads to multiple interpretation. Suggest to delete the first sentence - make clear that workers's access to transportation and communication are not taken away as punishment due to weak performance. There should be recognised some rules where such restriction is to be imposed due to safety issue and/or confidentiality issues. Example, where there is restriction of taking picture due to confidential matters, and or mobile phone is not allowed in certain working condition.

#	Indicator	Comment (English)
660	6.7.8	"Should refer to 6.7.1B, 6.8.1 B is health and safety indicators. "
661	6.7.8	wrong ref.
662	6.7.8	Suggest to correct the reference [(ref. 6.8.1 B) irrelevant - 6.8.1 B refers to prevent work-related injuries and ill health]
663	6.7.8	HRDD is mentioned in 6.7.9 particularly in the context of an assessment and focusing on recruitment process only. HRDD should be implemented and assessed to cover the entire scope of human rights. It is not clear what are the practical implications or how it's going to be applied for mills. We note that continued relevance of RSPO certification will depend also in how far it can support the implementation of HRDD related legal requirements such as the CSDDD.
664	6.7.8	It is only fair for growers to see the framework of reimbursement and to be agreed upon the before growers can decide whether to accept the guidance.
665	6.7.8	This wording is not clear, does it refers to hiring fees?
666	6.7.8	6.8.1 B is not related to the issue of the indicator, it must be explicit that the payment of contracting quotas is not allowed.
667	6.7.9	"To define the clearly on the term of the access to transport and/or communication in the list of definition. To provide what are the conditions that can be assumed that the restriction of transport and/or communication has occurred / take place in the UoC.. "
668	6.7.9	HRDD is a very broad scope and child labour, discrimination, overtime have been covered under other indicators. This assessment shall confine to implementation of recruitment practices as per 6.7.1 and to remove the word "third party". Let the UoC decides the internal team who is capable to conduct the assessment.
669	6.7.9	[Accra WS] 6.7.12 reference to 6.8.1 b should be 6.7.1B
670	6.7.9	Remove the word "Any" and the payment as defined in ILO guidance.
671	6.7.9	6.7.9 The assessment should always be conducted by a 3rd party, recognised by RSPO.
672	6.7.9	wrong ref.
673	6.7.9	"RSPO Principles & Criteria 2023 shall be reimbursed for any payments (ref: 6.8.1 b) this should ref to 6.7.1. 6.8.1 B is for health and safety indicators. "
674	6.7.9	Suggest to correct the reference [(ref. 6.8.1 B) irrelevant - 6.8.1 B refers to prevent work-related injuries and ill health]

#	Indicator	Comment (English)
675	6.7.9	<p>"In this 6.7.9 indicator there are several proposals, namely:</p> <ul style="list-style-type: none"> - Changes in the sentence indicator to ""Assessment of Annual Human Rights Complete Test on the Internal Recruitment Process and Third Party must be carried out a certification unit to identify and overcome the potential impact of human rights on workers. This assessment must be carried out by internal staff who are not involved in the recruitment process or by third parties accordingly applicable national regulations "". - The sentence ""Assessment must include the process of identification and remediation of all payments (ref. 6.8.1 b) conducted by workers during the process Recruitment ""removed from the indicator."
676	6.7.9	<p>"Indicator 6.7.9 (c) Proposed:</p> <ul style="list-style-type: none"> - Changes in the sentence indicator to ""Assessment of Annual Human Rights Complete Test on the Internal Recruitment Process and Third Party must be carried out a certification unit to identify and overcome the potential impact of human rights on workers. This assessment must be carried out by internal staff who are not involved in the recruitment process or by third parties accordingly applicable national regulations "". - The phrase ""The assessment must include the process of identification and remediation of all payments (ref. 6.8.1 b) conducted by workers during the recruitment process"" removed from the indicator."
677	6.7.9	<p>"6.7.9 Please explain about the definition and purpose of the completion of the Human Rights Completion, and how to carry out the complete test</p> <p>What is the connection between the Human Rights Completion Test with Indicator 6.8.1 B?</p> <p>"</p>
678	6.7.9	<p>"- Changes in the sentence indicator to ""Assessment of Annual Human Rights Complete Test on the Internal Recruitment Process and Third Party must be carried out a certification unit to identify and overcome the potential impact of human rights on workers. This assessment must be carried out by internal staff who are not involved in the recruitment process or by third parties accordingly applicable national regulations "".</p> <ul style="list-style-type: none"> - The sentence ""Assessment must include the process of identification and remediation of all payments (ref. 6.8.1 b) conducted by workers during the process Recruitment ""removed from the indicator."

#	Indicator	Comment (English)
679	6.7.9	<p>"This indicator is removed, because of the recruitment process Internal and third parties refer to regulations the applicable national and several indccathers have cover the requirements that must be carried out related to the process recruitment and is quite comprehensive. 2.1.2, 2.2.3, 2.4.2, 2.5.1, 6.1.1, 6.1.2, 6.2.2, 6.2.4, 6.4.1, 6.4.2, 6.5.1, 6.7.1, 6.7. 3 6.7.8, 6.7.10, 6.7.11, and 6.7.12.</p> <p>For example 2.1.2: "... legal due diligence of all Contracted third parties, recruitment agencies, service Providers and Labor Contractors."</p>
680	6.7.9	<p>"- Assessment of Annual Human Rights Complete Test on the Internal Recruitment Process and Third Party must be carried out a certification unit to identify and overcome the potential impact of human rights on workers. This assessment must be carried out by internal staff who are not involved in the recruitment process or by third parties in accordance with applicable national regulations. - The sentence ""Assessment must include the process of identification and remediation of all payments (ref. 6.8.1 b) conducted by workers during the process Recruitment ""removed from the indicator."</p>
681	6.7.9	<p>"Proposed 6.7.9: 1. Changes in sentence indicators 6.7.9 to ""Assessment of Annual Human Rights Complete Test on the Internal Recruitment Process and Third Party must be carried out a certification unit to identify and overcome the potential impact of human rights on workers. This assessment must be carried out by internal staff who are not involved in the recruitment process or by third parties in accordance with the applicable national regulations"" . 2. The sentence ""Assessment must include the process of identification and remediation of all payments (ref. 6.8.1 b) conducted by workers during the process Recruitment ""removed from the indicator."</p>

#	Indicator	Comment (English)
682	6.7.9	<p>"Proposal:</p> <ul style="list-style-type: none"> - Changes in the sentence indicator to ""Assessment of Annual Human Rights Complete Test on the Internal Recruitment Process and Third Party must be carried out a certification unit to identify and overcome the potential impact of human rights on workers. This assessment must be carried out by internal staff who are not involved in the recruitment process or by third parties accordingly applicable national regulations "". - The sentence ""Assessment must include the process of identification and remediation of all payments (ref. 6.8.1 b) conducted by workers during the process Recruitment ""removed from the indicator."
683	6.7.9	<p>Indicator 6.7.9 (c) Proposed: - Changes in sentences Indicators to "Assessment of Annual Human Rights Complete Test on the Internal Recruitment and Third Party Process must be carried out to identify and overcome the potential impact of human rights on workers. This assessment must be carried out by internal staff who are not involved in the recruitment process or by third parties in accordance with applicable national regulations ". - The phrase "The assessment must include the process of identification and remediation of all payments (ref. 6.8.1 b) conducted by workers during the recruitment process" removed from the indicator.</p>
684	6.7.9	<p>"Indicator 6.7.9 (c) is proposed for:</p> <ol style="list-style-type: none"> 1. Changes in the sentence indicator to ""Assessment of Annual Human Rights Complete Test on the Internal Recruitment Process and Third Party must be carried out a certification unit to identify and overcome the potential impact of human rights on workers. This assessment must be carried out by internal staff who are not involved in the recruitment process or by third parties according to the applicable national regulations "". 2. The sentence ""Assessment must include the process of identification and remediation of all payments (ref. 6.8.1 b) conducted by workers during the recruitment process"" is removed from the indicator."
685	6.7.9	<p>"[I] 6.7.9</p> <ul style="list-style-type: none"> - Changes in the sentence indicator to ""Assessment of Annual Human Rights Complete Test on the Internal Recruitment Process and Third Party must be carried out a certification unit to identify and overcome the potential impact of human rights on workers. This assessment must be carried out by internal staff who are not involved in the recruitment process or by third parties accordingly applicable national regulations "". - The sentence ""Assessment must include the process of identification and remediation of all payments (ref. 6.8.1 b) conducted by workers during the process Recruitment ""removed from the indicator."

#	Indicator	Comment (English)
686	6.7.9	<p>"Proposal: Indicator 6.7.9 is deleted, due to the recruitment process Internal and third parties refer to regulations the applicable national and several indccathers have cover the requirements that must be carried out related to the process recruitment and is quite comprehensive. 2.1.2, 2.2.3, 2.4.2, 2.5.1, 6.1.1, 6.1.2, 6.2.2, 6.2.4, 6.4.1, 6.4.2, 6.5.1, 6.7.1, 6.7.3 6.7.8, 6.7.10, 6.7.11, and 6.7.12. For example 2.1.2: ""... legal due diligence of all Contracted third parties, recruitment agencies, service Providers and Labor Contractors."</p>
687	6.7.9	<p>"6.7.9: This indicator is deleted, because the process of internal recruitment and third party refers to the applicable national regulations and several indccatures have covered the requirements that must be carried out related to the recruitment process and are quite comprehensive. 2.1.2, 2.2.3, 2.4.2, 2.5.1, 6.1.1, 6.1.2, 6.2.2, 6.2.4, 6.4.1, 6.4.2, 6.5.1, 6.7.1, 6.7.3 6.7.8, 6.7.10, 6.7.11, and 6.7.12. For example 2.1.2: ""... legal due diligence of all Contracted Third Parties, Recruitment Agencies, Service Providers and Labor Contractors."</p>
688	6.7.9	<p>"- Changes in the sentence indicator to ""Assessment of Annual Human Rights Complete Test on the Internal Recruitment Process and Third Party must be carried out a certification unit to identify and overcome the potential impact of human rights on workers. This assessment must be carried out by internal staff who are not involved in the recruitment process or by third parties accordingly applicable national regulations "".</p> <p>- The sentence ""Assessment must include the process of identification and remediation of all payments (ref. 6.8.1 b) conducted by workers during the process Recruitment ""removed from the indicator."</p>

#	Indicator	Comment (English)
689	6.7.9	"Proposed indicator 6.7.9: - Changes in the sentence indicator to ""Assessment of Annual Human Rights Complete Test on the Internal Recruitment Process and Third Party must be carried out a certification unit to identify and overcome the potential impact of human rights on workers. This assessment must be carried out by internal staff who are not involved in the recruitment process or by third parties accordingly applicable national regulations "". - The sentence ""Assessment must include the process of identification and remediation of all payments (ref. 6.8.1 b) conducted by workers during the process Recruitment ""removed from the indicator."
690	6.7.9	Proposed 6.7.9: (1). Changes in the sentence indicator to "Assessment of Annual Human Rights Complete Test on the Internal Recruitment Process and Third Party must be carried out a certification unit to identify and overcome the potential impact of human rights on workers. This assessment must be carried out by internal staff who are not involved in the recruitment process or by third parties according to the regulations applicable national ". (2). The phrase "Assessment must include the process of identification and remediation of all payments (ref. 6.8.1 b) conducted by workers during the recruitment process" removed from the indicator.
691	6.7.9	The 6.8.1 is not related to the item, it is suggested to eliminate taking into account that there are internal audit procedures that support legal compliance as the standard requirements, including Human rights.
692	6.7.9	The 6.8.1 is not related to the item, it is suggested to eliminate-teaching that there is already a due diligence in principle 2 this requirement is repeated and that it would be the minimum that should be evaluated in Human Rights to be clear in an audit in an audit .
693	6.7.9	The 6.8.1 is not related to the issue discussed in this indicator, it is suggested to eliminate taking into account that there is an indicator in principle 2 that includes the evaluation of legal compliance and compliance with human rights
694	6.7.11	[Abidjan WS] 6.7.11 to add (if applicable) - where there is no reimbursement needed - this is not needed. As this is not applicable in Africa.
695	6.7.12	The clause has provided clear timeline and guidance regarding reimbursement. A detail procedure should be ruled further by each UoC following their policy and SOPs. The P&C should focus more on how auditor can check that UoC has implement it within the timeline.
696	6.7.12	[Accra WS] 6.7.8 (reference to 6.8.1B is wrong), should be 6.7.1B
697	6.7.12	[Accra WS] 6.7.9 - RSPO guidance on due diligence (checklist) needed.
698	6.7.12	[Accra WS] 6.7.9 (reference to 6.8.1 is wrong) should be 6.7.1
699	6.7.12	"Should refer to 6.7.1B, 6.8.1 B is health and safety indicators. "

#	Indicator	Comment (English)
700	6.7.12	"> Suggest to correct the reference > Suggest HRDD component to be more holistic: at mill level, UoC needs to make sure they have the HRDD process/system implemented for the non-certified portion of their supply base i.e. for example assessment of human rights would involve field work and consultation with potentially affected stakeholders about risk and ways to address those risks. [>(ref. 6.8.1 B) irrelevant - 6.8.1 B refers to prevent work-related injuries and ill health >HRDD is only appearing once through an assessment of internal and 3rd party recruitment processes though the implementation of HRDD is relevant to the entire mill level]. "
701	6.7.12	6.7.12 What about contractors' workers? How does this apply to them?
702	6.7.12	6.7.12: should refer to "6.7.1" not "6.8.1 B" related to SOP and POD K3
703	6.7.12	"Should refer to ""6.7.1"" not ""6.8.1 B"" related to SOP and POD K3"
704	6.7.12	It is suggested to clarify the scope of the reimbursement of the hiring costs, otherwise eliminate the indicator.
705	6.8	"Training and compliance must be ensured by the unit of certification. Following multi-stakeholder consultations, the RSPO must issue clear guidelines on respect for workers' health and the prevention of workplace accidents, whether on plantations or in mills. These guidelines must be applied through various channels: displays, signage, training, awareness-raising, incentives, etc."
706	6.8	"Training and compliance must be ensured by the unit of certification. Following multi-stakeholder consultations, the RSPO must issue clear guidelines on respect for workers' health and the prevention of workplace accidents, whether on plantations or in mills. These guidelines must be applied through various channels: displays, signage, training, awareness-raising, incentives, etc."

#	Indicator	Comment (English)
707	6.8	"[HRSS] To include an indicator on worker accident insurance - this was previously covered under Indicator 6.7.4 of the 2018 P&C. Excluding this risks diluting the standards. Proposal, ""6.8.11 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection. Occupational injuries and illnesses shall be recorded using Lost Time Accident (LTA) metrics. Processes to investigate work-related incidents shall be developed and implemented. Reports of the investigation shall be documented. Findings from the investigations are forwarded to the Health and Safety Committee for the purposes of updating the Health and Safety Plan. Costs incurred from work-related incidents leading to injury or illness, shall be covered by the Unit of Certification in accordance with National Laws.""
708	6.8	6.8 In general, indicators - indicators in the criteria 6.8 are too detailed. It is recommended to make the indicator to be more simple, where other detailed things are included in the guide only
709	6.8.1	These policies must be applied through various channels: displays, signage, training, awareness-raising, incentives, etc.
710	6.8.1	"These policies must be applied through various channels: displays, signage, training, awareness-raising, incentives, etc."
711	6.8.1	">Suggest to ensure that a safe and healthy working place is provided to all workers and this includes at least access to safe drinking water, basic sanitation facilities, REST AREAS, and protective equipment free of any cost. >Suggest to ensure that there is regular maintenance of machinery, equipment and work materials/devices in order to ensure their safe and efficient functioning [Occupational Health and Safety policies and procedures shall be established and implemented. The policies and procedures shall include the following: a) Assure a safe and healthy working place] "
712	6.8.1	These policies must be applied through various channels: displays, signage, training, awareness-raising, incentives, etc.
713	6.8.1	6.8.1 Change the word bad health, for occupational diseases established by the environment of each company, fulfilling the national legislation of each country.
714	6.8.1	6.8.1 Change the word poor health, for occupational diseases established by the environment of each company, complying with the national legislation of each country
715	6.8.1	injuries and diseases, it should be the writing
716	6.8.1	How the ANC intervenes in these requirements.
717	6.8.1	It is suggested to change the bad health for occupational diseases.
718	6.8.2	[HRSS] Propose to add "The H&S Plan shall be communicated and made available to all workers." to align with Criteria 3.6 of 2018 P&C

#	Indicator	Comment (English)
719	6.8.2	"Please consider the below comments: <ul style="list-style-type: none"> •Chemical risks should be assessed as per the UN Global Harmonising System and identified and labelled accordingly. •H&S Committee and assessments should include assessments to ensure the structural integrity of buildings and the proper and safe installation of electrical wiring, lighting and gas fixtures. •H&S plans should ensure warning signs and safety information for dangerous equipment is provided and visible to workers. "
720	6.8.2	""Training and compliance must be ensured by the unit of certification. Following multi-stakeholder consultations, the RSPO must issue clear guidelines on respect for workers' health and the prevention of workplace accidents, whether on plantations or in mills. These guidelines must be applied through various channels: displays, signage, training, awareness-raising, incentives, etc.""
721	6.8.2	6.8.2 There is confusion here. There are certain things that the H&S committee can do and certain things that have to be done independently by the UoC either through professional or management staff. What is required of the H&S committee is awareness of what is going on. Thus, parking so much under a single H&S committee management has created an indicator that will be difficult to audit and implement. Some revision is needed. The H&S committee should meet monthly.
722	6.8.2	In indicators 6.8.2 Points f The term Welfare Committee is proposed to be changed to a gender committee (relevant to indicator 6.6.3)
723	6.8.2	Proposed 6.8.2 Points F: Terms of the Welfare Committee for Welfare Revised into Gender Committee (to be relevant to indicators 6.6.3)
724	6.8.2	Point F The term Women's Welfare Committee is proposed to be changed to the Gender Committee (relevant to indicators 6.6.3)
725	6.8.2	Point F The term Women's Welfare Committee is changed to the Gender Committee (relevant to indicators 6.6.3)
726	6.8.2	"Proposal: Point F The term Women's Welfare Committee is proposed to be changed to the Gender Committee (relevant to indicators 6.6.3) "
727	6.8.2	Indicator 6.8.2 (c) Proposed to: Points F The term "female welfare committee" is changed to "gender committee" (relevant to indicators 6.6.3).
728	6.8.2	6.8.2 Points F The term Women's Welfare Committee is proposed to be changed to the Gender Committee (relevant to indicators 6.6.3)
729	6.8.2	6.8.2 Points F The term Women's Welfare Committee is proposed to be changed to the Gender Committee (relevant to indicators 6.6.3)

#	Indicator	Comment (English)
730	6.8.2	"[I] 6.8.2 Point F The term Women's Welfare Committee is proposed to be changed to the Gender Committee (relevant to indicators 6.6.3)"
731	6.8.2	"Indicator 6.8.2 (c) Proposed: Point F The term Women's Welfare Committee is proposed to be changed to the Gender Committee (relevant to indicators 6.6.3) "
732	6.8.2	Proposed changes 6.8.2, namely point f The term Women's Welfare Committee is changed to the Gender Committee (relevant to indicators 6.6.3)
733	6.8.2	"Proposed 6.8.2: Points F The term Women's Welfare Committee is proposed to be changed to the Gender Committee (relevant to indicators 6.6.3) "
734	6.8.2	6.8.2 Change the Welfare Committee of Women for Gender Committee, in the same way as it is in indicator 6.6.3
735	6.8.2	6.8.2 Change the Welfare Committee of Women for Gender Committee, in the same way as it is in indicator 6.6.4
736	6.8.2	"It is suggested that the committee is composed of management representative and not by a member of the management. In item c) it is suggested to change the word ""eliminate"" by ""mitigate or control threats in the workplace."" In item f) it is suggested to change ""Women's Welfare Committee"" for ""Gender Committee"". "
737	6.8.3	This indicator is too lengthy and it dilutes the actual purpose. Indicator shall be precise and auditable. The sub-points shall be moved to guidance.
738	6.8.3	6.8.3 The healthy and safety component for young workers and workers with disabilities is excluded here. Only emphasizing women (gender-related).
739	6.8.3	"In indicator 6.8.3 - The phrase ""Identifying Occupational Safety and Health Problems"" was changed to ""Identify Occupational Safety and Health Issues"" (translation is not appropriate)"
740	6.8.3	6.8.3 Hirarc can be done by certain personnel as long as they have received AK3 training (there is no 3 -year time requirement).
741	6.8.3	"The phrase ""identify safety problems and Occupational health ""was changed to"" identify issues Safety and Occupational Health "". Lack of translation in accordance."

#	Indicator	Comment (English)
742	6.8.3	Proposed 6.8.3: The phrase "Identifying Occupational Safety and Health Issues" was changed to "Identifying Occupational Safety and Health Issues". The word problem is corrected by issues (translation inappropriate)
743	6.8.3	The phrase "Identifying Occupational Safety and Health Issues" was changed to "Identifying Occupational Safety and Health Issues" (translation is not appropriate)
744	6.8.3	"Indicator 6.8.3 (c) Proposed: - The phrase ""Identifying Occupational Safety and Health Problems"" was changed to ""Identify Occupational Safety and Health Issues"" (translation is not appropriate) "
745	6.8.3	Proposed changes 6.8.3 Namely, the phrase "Identifying Occupational Safety and Health Problems" was changed to "Identifying Occupational Safety and Health Issues". (translation is not appropriate)
746	6.8.3	"Proposal: - The phrase ""Identifying Occupational Safety and Health Problems"" was changed to ""Identify Occupational Safety and Health Issues"" (translation is not appropriate)"
747	6.8.3	"Indicator 6.8.3 (c) is proposed for: The phrase ""Identifying Occupational Safety and Health Problems"" was changed to ""Identifying Occupational Safety and Health Issues"". Because the translation is not appropriate."
748	6.8.3	Indicator 6.8.3 - The sentence "Identifying Occupational Safety and Health Problems" was changed to "Identify Occupational Safety and Health Issues" (translation is not appropriate)
749	6.8.3	- The phrase "Identifying Occupational Safety and Health Problems" was changed to "Identify Occupational Safety and Health Issues". (translation is not appropriate)
750	6.8.3	- The phrase "Identifying Occupational Safety and Health Problems" was changed to "Identify Occupational Safety and Health Issues" (translation is not appropriate)
751	6.8.3	"Proposal 6.8.3: The phrase ""Identifying Occupational Safety and Health Issues"" was changed to ""Identifying Occupational Safety and Health Issues"" (translation is not appropriate) "
752	6.8.3	"[I] 6.8.3 - The phrase ""Identifying Occupational Safety and Health Problems"" was changed to ""Identify Occupational Safety and Health Issues"" (translation is not appropriate)"
753	6.8.3	Indicator 6.8.3 - The sentence "Identifying Occupational Safety and Health Problems" was changed to "Identify Occupational Safety and Health Issues" (translation is not appropriate)

#	Indicator	Comment (English)
754	6.8.3	6.8.3: The phrase "Identifying Occupational Safety and Health Problems" was changed to "Identifying Occupational Safety and Health Issues". The translation is not appropriate.
755	6.8.3	"Proposed indicator 6.8.3: The phrase ""identify safety problems and Occupational health ""was changed to"" identify issues Safety and Occupational Health "". Lack of translation in accordance."
756	6.8.3	The legislation determines the profile that the person responsible for the IAECR evaluation must have and does not follow the guidelines contemplated by the indicator, for this reason it must be established that for those countries that legislate on the subject, it must follow what indicates the legislation
757	6.8.3	It is suggested to eliminate "every three years" and leave the scope "according to applicable national legislation."
758	6.8.4	[HRWG] Recommendation: The 2018 requirement should be reinstated. It is important that the H&S Plan should be communicated and made clear to the workers in their local languages with the maps/drawings/diagrams made available to them.
759	6.8.4	6.8.4 This requirement can be deleted because risk mitigation and repair action are part of the manufacture of hierarc (indicator 6.8.3).
760	6.8.4	Indicator with incomplete information
761	6.8.5	Sufficient water and sanitation facilities, including toilets, should be provided in the field which are well maintained.
762	6.8.5	6.8.5 to add regarding safety culture. Also to add ..."the prevention of injury, illness, and death of workers. Also a provision of safe systems of work, the provision of safety equipment/tools, a safe working conditions, risk assessment, management planning & information for workers
763	6.8.5	6.8.5 Respect the national legislation of each country with the scope of first aid, having emergency brigades, define the scope within the indicator
764	6.8.5	6.8.5 Respect the national legislation of each country with the scope of first aid, having emergency brigades, define the scope within the indicator.
765	6.8.5	Keep in mind that training the entire workforce in first aid is difficult to comply, each country must comply with its legislation
766	6.8.5	Defining the scope of "basic first aid" to workers, taking into account that training the entire workforce may not be attainable in reality.
767	6.8.6	Sufficient water and sanitation facilities, including toilets, should be provided in the field which are well maintained.
768	6.8.7	Sufficient water and sanitation facilities, including toilets, should be provided in the field which are well maintained.
769	6.8.7	PPE should be comfortable.
770	6.8.7	Expiration dates WHERE APPLICABLE. Not all first aid equipment has expiration dates.
771	6.8.7	To provide guidance and explanation on how the evaluation to the accessibility of sanitation facilities shall be done by UoC.

#	Indicator	Comment (English)
772	6.8.7	<p>"Indicator 6.8.7 Points D should be changed to: The life life of the APD provided must be recorded and the PPE that has expired should not be used.</p> <p>There is a certification unit that applies the APD replacement system for each PPE is damaged. That way, even though there is an estimated life life, it is no longer a sole reference. So there are conditions where the life life has been exceeded but the PPE is still suitable for use and will not be replaced. Will this be considered a violation of indicators 6.8.7 points d? For the record, not all PPE producers include information about the service life so that generally the service life is determined by the certification unit based on the field experience. This could be different from the reality of each worker who uses the PPE."</p>
773	6.8.7	"Indicators become more detailed. Proposed to using the P&C 2018 indicator sentence."
774	6.8.7	Keep using the old indicator sentence (P&C 2018)
775	6.8.7	In indicator 6.8.7 you should continue to use the old indicator sentence (P & C 2018 Indicator 6.7.3)
776	6.8.7	6.8.7 Keep using the old indicator sentence (P&C 2018)
777	6.8.7	Proposed 6.8.7 still use the old indicator sentence (P&C 2018)
778	6.8.7	Keep using the old indicator sentence (P&C 2018)
779	6.8.7	<p>"Proposed Improvement of Indicators 6.8.7 to become workers using appropriate personal protective equipment (PPE), and is provided without being collected payment to all workers at work, as protection in all operations that have Potential hazards, such as pesticide applications, machine operations, land preparation, and harvest. Facility Sanitation is available for workers who use pesticides so that workers can release PPE, clean himself and wear his personal clothes."</p>
780	6.8.7	Keep using the old indicator sentence (P&C 2018, 6.7.3)
781	6.8.7	Indicator 6.8.7 (c) is proposed to: keep using the old indicator sentence (P&C 2018).
782	6.8.7	<p>"[I] 6.8.7</p> <p>Keep using the old indicator sentence (P&C 2018)"</p>
783	6.8.7	<p>"Indicator 6.8.7 (c) Proposed:</p> <p>Keep using the old indicator sentence (P&C 2018)"</p>

#	Indicator	Comment (English)
784	6.8.7	"Proposed indicator 6.8.7: Proposed for using the P&C 2018 indicator sentence. The indicator is too more detailed to be an indicator."
785	6.8.7	6.8.7The uses the old indicator sentence (P&C 2018)
786	6.8.7	Indicator 6.8.7 Keep using the old indicator sentence (P&C 2018)
787	6.8.7	"Proposal: Keep using the old indicator sentence (P&C 2018)"
788	6.8.7	Proposed 6.8.7 (c): Keep using old indicator sentences at P&C RSPO 2018, namely Indicator 6.7.3 (C)
789	6.8.7	"Proposal 6..8.7 Proposed indicators continue to use old indicator sentences (P&C 2018)"
790	6.8.7	6.8.7: The indicator becomes more detailed. Proposed to use the P&C 2018 indicator sentence.
791	6.8.7	6.8.7. A more simplicated indicator for small associated or system producers should be defined, as they do for PPIs. Small producers must identify and know the risks to health and safety, have safe facilities, make use of appropriate EPP and receive training.
792	6.8.7	6.8.7. A more simplicated indicator for small associated or system producers should be defined, as they do for PPIs. Small producers must identify and know the risks to health and safety, have safe facilities, make use of appropriate EPP and receive training.
793	6.8.8	PPE should be comfortable.
794	6.8.8	[6.8.8] Does not sound realistic in the case of the field workers.
795	6.8.8	Suggest to reinforce the requirement i.e. to make sanitation facilities available and in sufficient number in the plantation fields [Issue: There are insufficient sanitation facilities in the plantation fields].
796	6.8.8	Suggest to reinforce the requirement i.e. to make sanitation facilities available and sufficient in the plantation fields [Issue: There are insufficient sanitation facilities in the plantation fields].
797	6.8.8	Sustained objection from Growers: This is not practical and we must not raise the ceiling without raising the bar. Such commitments on accessibility of sanitary facilities lead to financial impact therefore shared responsibility on the uptake of CSPO shall be taken into considerations before growers can commit to this. The commitments on shared responsibility is relatively poor at this point of time. Please drop this indicator.
798	6.8.8	"PPE should be comfortable. "
799	6.8.8	It is suggested that national legislation be paid in the field.
800	6.8.8	It is suggested that national legislation be paid in the field.

#	Indicator	Comment (English)
801	6.8.9	<p>"[HRSS] To include an indicator on worker accident insurance - this was previously covered under Indicator 6.7.4 of the 2018 P&C. Excluding this risks diluting the standards.</p> <p>Proposal, ""6.8.11 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection. Occupational injuries and illnesses shall be recorded using Lost Time Accident (LTA) metrics. Processes to investigate work-related incidents shall be developed and implemented. Reports of the investigation shall be documented. Findings from the investigations are forwarded to the Health and Safety Committee for the purposes of updating the Health and Safety Plan. Costs incurred from work-related incidents leading to injury or illness, shall be covered by the Unit of Certification in accordance with National Laws.""</p>
802	6.8.9	<p>"In indicator 6.8.9 there are several proposals namely - Emergency response team related to wildlife refers to national regulations - Proposal of the phrase ""Emergency Response Team Wildlife Problem"" was changed to ""Emergency Response Team related to wildlife""</p>
803	6.8.9	<p>Proposed 6.8.9: (1). Emergency Response Team related to wildlife refers to national regulations, (2). Proposed phrase "Emergency Response Team Wildlife Problem" was changed to "Emergency Response Team related to wildlife"</p>
804	6.8.9	<p>"Emergency Wildlife Response refers to the regulations national that applies with the aim of protecting Workers and protected animals."</p>
805	6.8.9	<p>"- Emergency response team related to wildlife refers to national regulations - Proposal of the phrase ""Emergency Response Team Wildlife Problem"" was changed to ""Emergency Response Team related to wildlife""</p>
806	6.8.9	<p>Emergency Wildlife Response refers to the National Regulation</p>
807	6.8.9	<p>"Indicator 6.8.9 is proposed to: 1. Emergency Response Team related to wildlife refers to national regulations. 2. Proposal of the phrase ""Emergency Response Team Wildlife Problem"" was changed to ""Emergency Response Team related to wildlife""."</p>
808	6.8.9	<p>"Indicator 6.8.9 Proposed: - Emergency response team related to wildlife refers to national regulations - Proposal of the phrase ""Emergency Response Team Wildlife Problem"" was changed to ""Emergency Response Team related to wildlife""</p>

#	Indicator	Comment (English)
809	6.8.9	Indicators 6.8.9 Proposed improvements to indicators: 1. Emergency response team related to wildlife refers to national regulations. 2. Proposal of the phrase "Emergency Response Team Wildlife Problem" was changed to "Emergency Response Team related to wildlife".
810	6.8.9	"Proposal: The formation of a wildlife emergency response team was revised into the formation of a wildlife emergency response team referring to national regulations"
811	6.8.9	"Proposal: - Emergency response team related to wildlife refers to national regulations - Proposal of the phrase ""Emergency Response Team Wildlife Problem"" was changed to ""Emergency Response Team related to wildlife"""
812	6.8.9	Proposed Amendment 6.8.9 namely, Emergency Wildlife Response refers to national regulations
813	6.8.9	Proposed Indicator 6.8.9: Emergency Wildlife Response refers to the national regulation that applies with the aim of protecting workers and protected animals.
814	6.8.9	"- Emergency response team related to wildlife refers to national regulations - Proposed sentence ""Emergency Response Team"
815	6.8.9	6.8.9: Emergency Wildlife Response refers to the national regulation that applies with the aim of protecting workers and protected animals.
816	6.8.9	Make it clearer to which it refers to wildlife so that any producer and auditor understands it.
817	6.8.9	Clarify what refers to emergencies for wildlife
818	6.8.9	Clarify Wildlife Emergencies
819	6.8.10	6.8.10 Maintain the term pesticides, since pesticides is a very broad according to the country or legislation. Similarly, the average exam must be according to the product used.
820	6.8.10	"6.8.10 Maintain the term pesticides, since pesticides is a very broad according to the country or legislation. Similarly, the average exam must be according to the product used."
821	6.8.10	6.8.10. The term pesticide must be maintained, since pesticide has a different definition in some LATAM countries.
822	6.8.10	Annual medical exams are performed according to the pesticide product used.
823	6.8.11	wildlife response, when applicable
824	6.8.11	[HRSS] Proposal: "The accessibility of sanitation facilities for workers shall be evaluated by the Unit of Certification, in consultation with Workers' representatives. Provision of any sanitation facilities following the consultation shall be maintained and ensure safe access for Workers especially women."

#	Indicator	Comment (English)
825	6.8.11	"[HRWG] Recommendation: Please reinstate the 2018 requirement. Worker accident insurance needs to be covered and this requirement should be restored as an indicator as per the 2018 P&C. CNV studies show there are often misunderstandings on who is responsible for paying insurances which may differ in context and national laws. Restore indicator. "
826	6.8.11	In indicator 6.8.11 The sentence "records injuries and diseases due to work accidents using metrics of loss of work time (Lost Accident/LTA)" returned the sentences such as old indicators 6.7.5 "recorded work accidents using the size of the accident that caused the loss of work time (lost time Accident/LTA) "
827	6.8.11	"Recorded injuries and diseases due to work accidents using metrics of loss of work time (Lost Accident/LTA)" returned to 6.7.5 "He recorded a work accident using the size of an accident that caused a loss of work time (Lost Time Accident/LTA)"
828	6.8.11	The proposed change of 6.8.11 is, "He recorded injuries and diseases caused by work accidents using metrics to lose work time (Lost Time Accident/LTA)". returned to 6.7.5 "The recorded work accident using the size of an accident that caused a loss of work time (Lost Accident/LTA)"
829	6.8.11	"Proposal: ""Recorded injuries and diseases due to work accidents using metrics of loss of work time (Lost Accident/LTA)"" returned to 6.7.5 ""He recorded a work accident using the size of an accident that caused a loss of work time (Lost Time Accident/LTA)""
830	6.8.11	Proposal: "Recorded injuries and diseases caused by work accidents using metrics of loss of work time (LTA)" Returned to 6.7.5 "Recorded work accidents using the size of an accident that caused a loss of work time (Lost Time Accident/LTA)"
831	6.8.11	"Indicator 6.8.11 is proposed to: sentence ""Recorded injuries and diseases due to work accidents using metrics of loss of work time (Lost Accident/LTA)"" returned to 6.7.5 ""He recorded a work accident using the size of an accident that caused a loss of work time (Lost Time Accident/LTA)""
832	6.8.11	"Proposed Indicator Improvement 6.8.11 Becomes: Work accidents are recorded using Lost Time Accident (LTA). The process of investigating incidents related to work accidents must be prepared and implemented. The investigation report must be documented. The findings of the investigation were then forwarded to the K3 Committee to update the K3 plan. Costs arising from incidents related to work accidents that cause injury or Disease is borne by the certification unit in accordance with national law."
833	6.8.11	"Indicator 6.8.11 Proposed: ""Recorded injuries and diseases due to work accidents using metrics of loss of work time (Lost Accident/LTA)"" returned to 6.7.5 ""He recorded a work accident using the size of an accident that caused a loss of work time (Lost Time Accident/LTA)""

#	Indicator	Comment (English)
834	6.8.11	"Proposal: ""Recorded injuries and diseases due to work accidents using metrics of loss of work time (Lost Accident/LTA)"" returned to 6.7.5 ""He recorded a work accident using the size of an accident that caused a loss of work time (Lost Time Accident/LTA)"""
835	6.8.11	"Recorded injuries and diseases due to work accidents using metrics to lose work time (Lost Time Accident/LTA)" changed to "recorded work accidents using the size of the accident that caused the loss of work time (Lost Time Accident/LTA)" - returned to indicator 6.7. 5 P&C 2018
836	6.8.11	"Proposed 6.8.11: ""Recorded injuries and diseases due to work accidents using the Metric Metric Loss of Working Time (LTA)"" Returned to P&C 2028 Indicators 6.7.5 namely ""recorded work accidents using the size of the accident that causes lost time accident/LTA"" """
837	6.8.11	"Noted injuries and diseases due to work accidents using metrics to lose work time (Lost Accident/LTA)". returned to 6.7.5 "The recorded work accident using the size of an accident that caused a loss of work time (Lost Accident/LTA)"
838	6.8.12	6.8.12. Do not change the pesticide term for pesticide, since pesticide has a different definition in some LATAM countries.
839	6.8.12	6.8.12. Do not change the pesticide term for pesticide, since pesticide has a different definition in some LATAM countries. At the beginning of the indicator they speak of pesticide but then refer to pesticide, which generates confusion
840	6.8.12	6.8.12. Do not change the pesticide term for pesticide, since pesticide has a different definition in some LATAM countries.

#	Indicator	Comment (English)
1	7	<p>We would strongly urge that throughout Principle 7 (and throughout the document), attention is paid to the substantial scientific evidence base and existing recommendations on improving effectiveness of RSPO P+C already created by the scientific community, including the Sensor project commissioned by the RSPO: http://www.sensorproject.net/reports/ This is a valuable body of research and practical recommendations, and incorporating it better into reviews of the Standards would make the process more efficient and effective</p>
2	7	<p>"Organic palm oil producers prove that production works without using chemical-synthetic pesticides if prevention is well done. RSPO should commit to the renunciation of extremely hazardous pesticides. Furthermore, define a broad minimum buffer zone to local communities, where application of sanitary products is not allowed."</p>
3	7.1	<p>"The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment.</p> <p>The use of molecules must be regulated and properly monitored. But it is above all farming practices that need to be guided to help the unit of certification in an operational way.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored. The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers."</p>
4	7.1	<p>"The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment.</p> <p>The use of molecules must be regulated and properly monitored. But it is above all farming practices that need to be guided to help the unit of certification in an operational way.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored. The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers."</p>

#	Indicator	Comment (English)
5	7.1	<p>"The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment.</p> <p>The use of molecules must be regulated and properly monitored. But it is above all farming practices that need to be guided to help the unit of certification in an operational way.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers."</p>
6	7.1	<p>"The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment.</p> <p>The use of molecules must be regulated and properly monitored. But it is above all farming practices that need to be guided to help the unit of certification in an operational way.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers."</p>
7	7.1	<p>"The use of BCA can sometimes have greater negative effects on the environment than pesticides. This must be determined on a case by case basis, predetermined by a study. How it currently reads, auditors may want companies to FIRST try out all possible BCA options, before any pesticides are applied, even though a BCA option may not be the best option. We must be very careful about this. "</p>

#	Indicator	Comment (English)
8	7.1	<p>"The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment.</p> <p>The use of molecules must be regulated and properly monitored. But it is above all farming practices that need to be guided to help the unit of certification in an operational way.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers."</p>
9	7.1	<p>"Recommendation for Criteria 7.9:</p> <p>1)Consider updating the text to “The Unit of Certification shall not cause deforestation or damage, peatlands, and other natural ecosystems. HCV areas, ...”</p> <p>2)Consider adding a definition of “natural ecosystems”. A suggested definition is the Accountability Frameworks’ definition of natural ecosystem (see Definitions Accountability Framework initiative - Accountability Framework (accountability-framework.org))</p> <p>3)If the term “conservation area” is also used, a scoping of “conservation area” is required.</p> <p>4)We support the statement on RTE species protection. We suggest that indicators related to RTE management are included as well.</p> <p>Rationale:</p> <p>1)To align with the existing responsible supply chain framework so that we can enhance the use of common language on the effectiveness of the grievance system.</p> <p>2)To make the term ‘natural ecosystem’ consistent with indicator 7.9.8.</p> <p>"</p>
10	7.1	<p>"The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment.</p> <p>"</p>

#	Indicator	Comment (English)
11	7.1	<p>""The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment.</p> <p>The use of molecules must be regulated and properly monitored. But it is above all farming practices that need to be guided to help the unit of certification in an operational way.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers.""</p>
12	7.1	<p>"The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment.</p> <p>The use of molecules must be regulated and properly monitored. But it is above all farming practices that need to be guided to help the unit of certification in an operational way.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers."</p>

#	Indicator	Comment (English)
13	7.1	<p>"The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment.</p> <p>The use of molecules must be regulated and properly monitored. But it is above all farming practices that need to be guided to help the unit of certification in an operational way.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers."</p>
14	7.1	<p>"The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment.</p> <p>The use of molecules must be regulated and properly monitored. But it is above all farming practices that need to be guided to help the unit of certification in an operational way.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers."</p>
15	7.1	<p>"The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment.</p> <p>The use of molecules must be regulated and properly monitored. But it is above all farming practices that need to be guided to help the unit of certification in an operational way.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers."</p>

#	Indicator	Comment (English)
16	7.1	a taskforce must be set up by the RSPO to occasionally review or even audit grievances related to these subjects in the plantations or Mills with the workers, without restriction of the unit of certifications
17	7.1	"Suggest to ensure that any use of biological control agents complies with national legislation. [The use of a Biological Control Agent (BCA) is the preferred option for the management of pests]."
18	7.1	"Also consider including criteria on human wildlife conflict. This is now only in the annex. For example by: Human wildlife conflict, (indirectly) driven by the cultivation of oil palm, is minimized by developing responsible management measures and damage is compensated to local communities if applicable."
19	7.1.1	7.1.1 "An integrated pest management PLAN". Please include the work plan. For years, this has been one of the weakest indicators. RSPO has not made an attempt to stipulate the minimum content of the plan. The development of a detailed plan should now be promoted.
20	7.1.1	"This policy must be modelled on the recommendations of the RSPO or any other relevant stakeholder certification/guidelines. Penalties must be clearly published and applied in the event of the use of unauthorized molecules and/or the spreading of products without appropriate protection of workers. There are agricultural practices to be put in place to prevent pest or disease attacks: these sustainable agricultural practices must be integrated into the guidelines provided by the RSPO to companies. Precautions towards the environment and the health of workers/local populations must be taken into account"
21	7.1.1	"This policy must be modelled on the recommendations of the RSPO or any other relevant stakeholder certification/guidelines. Penalties must be clearly published and applied in the event of the use of unauthorized molecules and/or the spreading of products without appropriate protection of workers. There are agricultural practices to be put in place to prevent pest or disease attacks: these sustainable agricultural practices must be integrated into the guidelines provided by the RSPO to companies. Precautions towards the environment and the health of workers/local populations must be taken into account"

#	Indicator	Comment (English)
22	7.1.1	<p>"This policy must be modelled on the recommendations of the RSPO or any other relevant stakeholder certification/guidelines. Penalties must be clearly published and applied in the event of the use of unauthorized molecules and/or the spreading of products without appropriate protection of workers.</p> <p>There are agricultural practices to be put in place to prevent pest or disease attacks: these sustainable agricultural practices must be integrated into the guidelines provided by the RSPO to companies.</p> <p>Precautions towards the environment and the health of workers/local populations must be taken into account"</p>
23	7.1.1	<p>"This policy must be modelled on the recommendations of the RSPO or any other relevant stakeholder certification/guidelines."</p>
24	7.1.1	<p>"Contradict with below statement: pesticide can be used where pest outbreaks are validated with strong evidence and justification, and no alternative which can be used for major threat.</p> <p>Propose the following revision, to combine both sentences:shall not be used or stored in the managed area unless validated with strong evidence and justification. "</p>
25	7.1.1	<p>"This policy must be modelled on the recommendations of the RSPO or any other relevant stakeholder certification/guidelines.</p> <p>Penalties must be clearly published and applied in the event of the use of unauthorized molecules and/or the spreading of products without appropriate protection of workers.</p> <p>There are agricultural practices to be put in place to prevent pest or disease attacks: these sustainable agricultural practices must be integrated into the guidelines provided by the RSPO to companies.</p> <p>Precautions towards the environment and the health of workers/local populations must be taken into account"</p>
26	7.1.1	<p>"This policy must be modelled on the recommendations of the RSPO or any other relevant stakeholder certification/guidelines.</p> <p>Penalties must be clearly published and applied in the event of the use of unauthorized molecules and/or the spreading of products without appropriate protection of workers.</p> <p>There are agricultural practices to be put in place to prevent pest or disease attacks: these sustainable agricultural practices must be integrated into the guidelines provided by the RSPO to companies.</p> <p>Precautions towards the environment and the health of workers/local populations must be taken into account"</p>

#	Indicator	Comment (English)
27	7.1.1	"[Sandakan, 21 June 2023] The Integrated Pest Management should be made applicable to the UoC only when there is any significant pest problems. Improve wording - ""If there is any significant pest issues within the UoC""", an Integrated Pest Management shall be developed..""
28	7.1.1	Penalties must be clearly published and applied in the event of the use of unauthorized molecules and/or the spreading of products without appropriate protection of workers.
29	7.1.1	Penalties must be clearly published and applied in the event of the use of unauthorized molecules and/or the spreading of products without appropriate protection of workers.
30	7.1.1	This policy must be modelled on the recommendations of the RSPO or any other relevant stakeholder certification/guidelines
31	7.1.1	"In the control and management of pests and diseases, reaching zero use is not realistic. The auditor must validate the efficiency of the MIPE; On the other hand, the use of biological agents is a clean alternative regarding the use of agrochemicals, so it is suggested to withdraw from the indicator's writing, what is mentioned with respect to environmental risks. In this context, we propose a writing that does not necessarily lead to the total elimination of the use of the alternative. So: ""Integrated pest management will be developed and applied to avoid, or reduce the frequency, scope and amount of pesticide applications, and which will lead to gradual reductions in applications."" Likewise, it is proposed that the definitions of agrochemical, pesticide, biological control agent, herbicide, pesticide and growth regulators be clearly included in the glossary."
32	7.1.1	This indicator for auditors is complex as written, I think that if the environmental risk analysis that each plantation should generate subjectivity is left, no palm founder is able to develop this activity.
33	7.1.1	"In the control and management of pests and diseases, reaching zero use is not realistic. The auditor must validate the efficiency of the MIPE; On the other hand, the use of biological agents is a clean alternative regarding the use of agrochemical They will take into account the environmental risks indicating the technical sheets of the supplier and/or producers of biological controllers. In this context, we propose a writing that does not necessarily lead to the total elimination of the use of the alternative. So: ""Integrated pest management will be developed and applied to avoid, or reduce the frequency, scope and amount of pesticide applications, and which will lead to gradual reductions in applications."" Likewise, it is proposed that the definitions of agrochemical, pesticide, biological control agent, herbicide, pesticide and growth regulators be clearly included in the glossary."
34	7.1.1	"The following is suggested: ""Integrated pest management will be developed and applied to avoid, or reduce the frequency, scope and amount of pesticide applications, and which will lead to gradual reductions in applications."" "

#	Indicator	Comment (English)
35	7.1.2	<p>"This policy must be modelled on the recommendations of the RSPO or any other relevant stakeholder certification/guidelines.</p> <p>Penalties must be clearly published and applied in the event of the use of unauthorized molecules and/or the spreading of products without appropriate protection of workers.</p> <p>There are agricultural practices to be put in place to prevent pest or disease attacks: these sustainable agricultural practices must be integrated into the guidelines provided by the RSPO to companies.</p> <p>Precautions towards the environment and the health of workers/local populations must be taken into account"</p>
36	7.1.2	<p>"This policy must be modelled on the recommendations of the RSPO or any other relevant stakeholder certification/guidelines.</p> <p>Penalties must be clearly published and applied in the event of the use of unauthorized molecules and/or the spreading of products without appropriate protection of workers.</p> <p>There are agricultural practices to be put in place to prevent pest or disease attacks: these sustainable agricultural practices must be integrated into the guidelines provided by the RSPO to companies.</p> <p>Precautions towards the environment and the health of workers/local populations must be taken into account"</p>
37	7.1.2	<p>"Penalties must be clearly published and applied in the event of the use of unauthorized molecules and/or the spreading of products without appropriate protection of workers."</p>
38	7.1.2	<p>– RSPO could look to control the use of other highly hazardous pesticides such as those meeting the criteria for category 1 carcinogens, mutagens and reproductive toxicity of the Globally Harmonised System of Classification and Labelling of Chemicals (GHS).</p>
39	7.1.2	<p>This policy must be modelled on the recommendations of the RSPO or any other relevant stakeholder certification/guidelines.</p>

#	Indicator	Comment (English)
40	7.1.2	<p>"This policy must be modelled on the recommendations of the RSPO or any other relevant stakeholder certification/guidelines.</p> <p>Penalties must be clearly published and applied in the event of the use of unauthorized molecules and/or the spreading of products without appropriate protection of workers.</p> <p>There are agricultural practices to be put in place to prevent pest or disease attacks: these sustainable agricultural practices must be integrated into the guidelines provided by the RSPO to companies.</p> <p>Precautions towards the environment and the health of workers/local populations must be taken into account"</p>
41	7.1.2	<p>"7.1.2 Proposed to return to the first draft, namely that the use of chemicals classified as 1A 1B WHO or the Rotterdam and Stockholm conventions can be done with a strong justification and validation or through permission from the government.</p> <p>That way it is enough to fulfill one of these requirements.</p> <p>"</p>
42	7.1.2	<p>"It is proposed to eliminate the requirement of the burden of proof and that only the authorization of government entities is sufficient.</p> <p>The following wording is suggested in the second paragraph: ""When there is a justification (that is, there is no other alternative) of the use for pest and/or disease outbreaks, government authorization will be obtained according to national regulations and will be developed and implemented A detailed application and management plan to avoid and mitigate negative impacts for the environment and human health. ""</p>
43	7.1.2	<p>"It is proposed to eliminate the requirement of the burden of proof and that only the authorization of government entities is sufficient.</p> <p>The following wording is suggested in the second paragraph: ""When there is a justification (that is, there is no other alternative) of the use for pest and/or disease outbreaks, government authorization will be obtained according to national regulations and will be developed and implemented A detailed application and management plan to avoid and mitigate negative impacts for the environment and human health. ""</p>

#	Indicator	Comment (English)
44	7.1.3	" The bones of contaminated foliar material for the PC case are included in the use of fire? If so, we propose the following writing: Burns for pest control will be prohibited. In exceptional cases in which the fire has to be used for the control of pests and diseases, the certification unit will provide evidence of prior approval by government authorities when required. In the case that the practice of burning as part of the sanitary management protocol this must be clearly supported technically and scientifically as a sanitary measure. So you must mitigate and/or repair damage to the environment. """"
45	7.1.4	"On the other hand, there are agricultural practices to be put in place to prevent pest or disease attacks: these sustainable agricultural practices must be integrated into the guidelines provided by the RSPO to companies. "
46	7.1.4	"Precautions towards the environment and the health of workers/local populations must be taken into account "
47	7.1.4	"Aerial spraying poses great risks to humans and the environment and the risks are difficult to keep under control. RSPO should commit to a clear ban on aerial spraying."
48	7.1.4	"The writing proposed in the draft standard clarifies that the prophylactic use of pesticides refers to preventive use and this type of products are used only for pest control. We consider it important to remove the loading of the producer, suggesting the following writing as follows: ""Prophylactic pesticides will not be used. When the use is allowed by national regulations, its use and management, it will be carried out as identified in national regulations and/or in the guide on best practices."" "
49	7.1.4	"The writing proposed in the draft of the standard, clarifies that the prophylactic use of pesticides refers to preventive use and this type of products are used only for pest control. We consider it important to remove the loading of the producer, suggesting the following writing as follows: ""Prophylactic pesticides will not be used. When the use is allowed by national regulations, its use and management, it will be carried out as identified in national regulations and/or in the guide on best practices.""
50	7.1.5	Precautions towards the environment and the health of workers/local populations must be taken into account
51	7.1.5	On the other hand, there are agricultural practices to be put in place to prevent pest or disease attacks: these sustainable agricultural practices must be integrated into the guidelines provided by the RSPO to companies.
52	7.1.5	propose to add : and/or CABI.org

#	Indicator	Comment (English)
53	7.1.5	<p>"The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment.</p> <p>The use of molecules must be regulated and properly monitored. But it is above all farming practices that need to be guided to help the unit of certification in an operational way.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers."</p>
54	7.1.5	On indicators 7.1.5 Definition Aerial spraying should be made clearer
55	7.1.5	Proposed for 7.1.5: Definition of aerial spraying is made clearer so that there is no multi-interpretation. In our opinion spraying with drones, does not belong to the aerial spraying category because the scope and focus are limited. RSPO also needs to open space for innovations that support fertilizer or herbisida applications with high precision so that environmental impacts can be minimized.
56	7.1.5	"The definition of aerial spraying is made clearer, and The use of drones is not included in the aerial spraying category which is prohibited."
57	7.1.5	"Proposal: - The definition of aerial spraying is made clearer"
58	7.1.5	7.1.5 - Definition of aerial spraying / spraying pesticides through air to be detailed more clearly. In our opinion, spraying pesticides with drone technology is not included in the aerial spraying category because it has a higher accuracy and minimal exposure to workers/ environment so that RSPO should be able to accommodate the use of this technology as a form of innovation for continuous improvement.
59	7.1.5	Proposed 7.1.5: Definition of aerial spraying is made clearer. It is necessary to accommodate the use of drones for spraying pesticides that can be more environmentally friendly, and not included in the category of air spraying. Because the use of drones for spraying is more appropriate dosage and targeted in spraying on each tree affected by pest attacks. So that environmental impacts can be avoided.

#	Indicator	Comment (English)
60	7.1.5	Proposed 7.1.5 - Definition of aerial spraying / spraying pesticides through air so that it is detailed more clearly. RSPO needs to accommodate the use of drone technology to spray pesticides that can be more environmentally friendly, and do not enter the category of air spraying. Because the use of drones for spraying is more precise and precise dosage and is right on target in spraying on each tree affected by pest attacks. So that environmental impacts can be avoided.
61	7.1.5	"Proposed Indicator 7.1.5: - Definition of aerial spraying needs to be clarified. "
62	7.1.5	"Proposed for 7.1.5: Definition of aerial spraying is made clearer so that there is no multi-interpretation. In our opinion spraying with drones, does not belong to the aerial spraying category because the scope and focus are limited. RSPO also needs to open space for innovations that support fertilizer or herbisisa applications with high precision so that environmental impacts can be minimized. "
63	7.1.5	Proposed for 7.1.5: Definition of aerial spraying is made clearer so that there is no multi-interpretation. In our opinion spraying with drones, does not belong to the aerial spraying category because the scope and focus are limited. RSPO also needs to open space for innovations that support fertilizer or herbisisa applications with high precision so that environmental impacts can be minimized.
64	7.1.5	"Indicator 7.1.5 Proposal: - The definition of aerial spraying is made clearer "
65	7.1.5	Indicator 7.1.5. The definition of aerial spraying is defined as more clearly so that there is no multi-interpretation. In our opinion spraying with drones, does not belong to the aerial spraying category because the scope and focus are limited. RSPO also needs to open space for innovations that support fertilizer or herbisisa applications with high precision so that environmental impacts can be minimized.
66	7.1.5	7.1.5: Definition of aerial spraying is made clearer, and the use of drones does not belong to the prohibited aerial spraying category.

#	Indicator	Comment (English)
67	7.1.5	"Proposal: Definition of aerial spraying / spraying pesticides through air needs to be detailed more clearly. In our opinion, spraying pesticides with drone technology is not included in the aerial spraying category because it has a higher accuracy and minimal exposure to workers/ environment so that RSPO should be able to accommodate the use of this technology as a form of innovation for continuous improvement "
68	7.1.5	Proposed indicator 7.15: Definition of aerial spraying to be made clearer
69	7.1.5	"7.1.5 The definition of aerial spraying is made clearer "
70	7.1.5	Clarify the definition of aerial spraying, especially related to the use of drones.
71	7.1.5	"Proposed changes in indicators 7.1.5 to: 7.1.5 (c) The certification unit is prohibited from using the method of spraying pesticides by air except in extraordinary circumstances when there are no other alternatives that are worth doing. Practices and innovations such as the use of drones by paying attention to environmental and social aspects are possible and are not included in the category of spraying areas. If spraying by air cannot be avoided, there must be previous approval from the government authority, and the application of the method must be informed in detail to the local community affected by at least 48 hours before the action is carried out. Comment: The definition and limitations of aerial spraying are made clearer. There are exceptions to the use of drones not belong to the aerial spraying category which is prohibited by paying attention to environmental and social aspects."
72	7.1.5	7.1.5 Definition Aerial spraying is made clearer
73	7.1.5	Indicator 7.1.5. The definition of aerial spraying is defined as more clearly so that there is no multi-interpretation. Spraying with drones, does not belong to the aerial spraying category because the scope and focus are limited and this is for innovations that support the application of fertilizer or herbicide with high precision so that environmental impacts can be minimized.
74	7.1.5	Clarify the definition of aerial spraying, especially related to the use of drones.
75	7.1.5	"Proposed Indicator 7.1.5: - It is necessary to clarify the definition of aerial spraying - Proposing a drone is not included in the aerial spraying category"

#	Indicator	Comment (English)
76	7.1.5	Proposed 7.1.5 - Definition of aerial spraying / spraying pesticides through air so that it is detailed more clearly. RSPO needs to accommodate the use of drone technology to spray pesticides that can be more environmentally friendly, and do not enter the category of air spraying. Because the use of drones for spraying is more precise and precise dosage and is right on target in spraying on each tree affected by pest attacks. So that environmental impacts can be avoided.
77	7.1.5	The obligation of prior approval of the government authorities must be modified by: the existing national regulation in each country will be fulfilled to carry out an air fumigation.
78	7.1.6	<p>"The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment.</p> <p>The use of molecules must be regulated and properly monitored. But it is above all farming practices that need to be guided to help the unit of certification in an operational way.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers."</p>
79	7.1.6	7.1.6 Proposed to return to the first draft, namely that if there is a species use listed in the Global Invasive and/or Cabi Database Species, the certification unit makes plans to control and prevent its spread.
80	7.1.7	<p>" The bones of contaminated foliar material for the PC case are included in the use of fire? If so, we propose the following writing: Burns for pest control will be prohibited. In exceptional cases in which the fire has to be used for the control of pests and diseases, the certification unit will provide evidence of prior approval by government authorities when required. In the case that the practice of burning as part of the sanitary management protocol this must be clearly supported technically and scientifically as a sanitary measure. So you must mitigate and/or repair damage to the environment. "" "</p>

#	Indicator	Comment (English)
81	7.1.7	"The bones of contaminated foliar material for the PC case are included in the use of fire? If so, we propose the following writing: Burns for pest control will be prohibited. In exceptional cases in which the fire has to be used for the control of pests and diseases, the certification unit will provide evidence of prior approval by government authorities when required. In the case that the practice of burning as part of the sanitary management protocol this must be clearly supported technically and scientifically as a sanitary measure. So you must mitigate and/or repair damage to the environment. "" "
82	7.1.7	It is recommended that they are established within the international standard. Does the slopes for steep terrain to what % do they refer to? Include a specific inclination percentage.
83	7.2	"Waste must be monitored in quantity and quality A waste reduction plan with a precise timeline must be put in place, made public and accessible to external stakeholders upon request. A prioritization of waste management must be carried out by the mill, with regard to the risk of pollution by type of waste but also by possibility of mitigation We can also add a 4th R: ReThink the use to avoid the generation of any new waste."
84	7.2.1	7.2.1 related to the prohibition of waste disposal to the water body according to this indicator, what about the disposal of liquid waste to a water body that has received licensing from the government as applies in Indonesia (Waste Disposal Permit, IPLC)?
85	7.2.1	Proposed 7.2.1 Word of Destruction of Waste Revised to "Waste Disposal
86	7.2.1	7.2.1. The waste of waste turns into "waste disposal and removes waste directly into the flow of water"
87	7.2.1	7.2.1. The waste of waste turns into "waste disposal and removes waste directly into the flow of water"
88	7.2.1	7.2.1 Destruction of Waste turns into "waste disposal and removes waste directly into the flow of water"
89	7.2.2	On the other hand, there are agricultural practices to be put in place to prevent pest or disease attacks: these sustainable agricultural practices must be integrated into the guidelines provided by the RSPO to companies.
90	7.2.2	7.2.2 Minimum content of the waste management plan must be determined by RSPO.
91	7.2.2	"7.2.2 made in more detail, with additional: - Waste management for operational and non-operational activities - Identify waste"

#	Indicator	Comment (English)
92	7.2.2	"7.2.2. Made in more detail, with the addition: - Waste management for operational and non-operational activities - Identify waste"
93	7.2.3	Precautions towards the environment and the health of workers/local populations must be taken into account
94	7.2.3	7.2.3 Component of the monitoring system must also be predetermined.
95	7.2.3	"Proposed 7.2.3: The indicator sentence only mentions ""Identifying and developing opportunities for reducing waste (especially plastic) is carried out in accordance with the provisions of the National Regulation"""
96	7.2.3	In indicators 7.2.3, the indicator sentence should only mention "Identifying and developing opportunities for reducing waste (especially plastic) is carried out in accordance with the provisions of the National Regulation"
97	7.2.3	"Indicator 7.2.3 Proposed: The indicator sentence only mentions ""Identifying and developing opportunities for reducing waste (especially plastic) is carried out in accordance with the provisions of the National Regulation"""
98	7.2.3	"Proposed changes in indicator sentences to, ""Identifying and developing opportunities Reduction of waste (especially plastic) is run accordingly National Regulation Provisions """
99	7.2.3	7.2.3 The application of this indicator will be difficult to talk about domestic waste because the type of waste that is very varied and the certification unit does not have the infrastructure to measure its quantity. This indicator 7.2.3 is also actually able to be covered by indicator 7.2.2
100	7.2.3	Proposed: The sentence indicator only mentions "Identifying and developing opportunities for reducing waste (especially plastic) is carried out in accordance with the provisions of the National Regulation"
101	7.2.3	Indicator 7.2.3. It is proposed that at this stage it is sufficient to be limited to "identify and develop opportunities for reducing waste (especially plastic) is carried out in accordance with the provisions of the National Regulation". Tracking and monitoring activities are currently focused on CPO products and their derivatives (Certified & Non-Cerated)
102	7.2.3	Proposed Improvement of Indicators 7.2.3 becomes a "system to identify and develop opportunities for reducing waste (especially plastic) is carried out in accordance with the provisions of the National Regulation"
103	7.2.3	7.2.3 - Sentences Indicators to only mention "Identifying and developing opportunities for reducing waste (especially plastic) are carried out in accordance with the provisions of the National Regulation"
104	7.2.3	Proposed Sentences Indicators: "Identifying and developing opportunities for reducing waste (especially plastic) are carried out in accordance with the provisions of the National Regulation".

#	Indicator	Comment (English)
105	7.2.3	Proposed Sentences Indicators: "Identifying and developing opportunities for reducing waste (especially plastic) are carried out in accordance with the provisions of the National Regulation".
106	7.2.3	The indicator sentence only mentions "Identifying and developing opportunities for reducing waste (especially plastic) is carried out in accordance with the provisions of the National Regulation"
107	7.2.3	"Indicator 7.2.3 Proposal: The indicator sentence only mentions ""Identifying and developing opportunities for reducing waste (especially plastic) is carried out in accordance with the provisions of the National Regulation"""
108	7.2.3	Indicator 7.2.3. It is proposed that at this stage it is sufficient to be limited to "identify and develop opportunities for reducing waste (especially plastic) is carried out in accordance with the provisions of the National Regulation". Tracking and monitoring activities are currently focused on CPO products and their derivatives (Certified & Non-Cerated)
109	7.2.3	"Proposed changes in sentence indicator 7.2.3: ""Identifying and developing opportunities Reduction of waste (especially plastic) is run accordingly National Regulation Provisions "" "
110	7.2.3	"Proposed indicator 7.2.3: - The sentence indicator only mentions ""Identifying and developing opportunities for reducing waste (especially plastic) is carried out according to the provisions of the National Regulation""."
111	7.2.3	Proposed Sentences Indicators: "Identifying and developing opportunities for reducing waste (especially plastic) are carried out in accordance with the provisions of the National Regulation".
112	7.2.3	Proposed Indicator 7.2.3: Sentences Indicators only mention "Identifying and developing opportunities for reducing waste (especially plastic) are carried out in accordance with the provisions of the National Regulation"
113	7.2.3	7.2.3: The sentence indicator only mentions "Identifying and developing opportunities for reducing waste (especially plastic) is carried out in accordance with the provisions of the National Regulation"
114	7.2.3	"7.2.3 Proposed: The indicator sentence only mentions ""Identifying and developing opportunities for reducing waste (especially plastic) is carried out in accordance with the provisions of the National Regulation"""
115	7.2.3	7.2.3: Proposed changes in sentence indicators to, "Identifying and developing opportunities for reducing waste (especially plastic) is carried out in accordance with the provisions of the National Regulation"

#	Indicator	Comment (English)
116	7.2.4	Suggest to do away with the term 'avoid' and aim for stronger indicators to stop planting and start restoration on these areas. This could be part of a biodiversity strategy to create 'islands of forest' in the plantation for species connectivity and future resilience of the landscape.
117	7.2.4	<p>""Waste must be monitored in quantity and quality</p> <p>A waste reduction plan with a precise timeline must be put in place, made public and accessible to external stakeholders upon request.</p> <p>A prioritization of waste management must be carried out by the mill, with regard to the risk of pollution by type of waste but also by possibility of mitigation</p> <p>We can also add a 4th R: ReThink the use to avoid the generation of any new waste.""</p> <p>"</p>
118	7.2.4	<p>"Waste must be monitored in quantity and quality</p> <p>A waste reduction plan with a precise timeline must be put in place, made public and accessible to external stakeholders upon request.</p> <p>A prioritization of waste management must be carried out by the mill, with regard to the risk of pollution by type of waste but also by possibility of mitigation</p> <p>We can also add a 4th R: ReThink the use to avoid the generation of any new waste."</p>
119	7.2.4	7.2.4 How do we determine the optimal use of fertilizer? How is the word "optimal" auditable?
120	7.2.4	Proposed Indicator Improvement 7.2.4 Becomes: There is a recycling strategy of nutrients, can include empty recycling, PKS liquid waste (POME), oil palm residues, and optimizing non-organic fertilizer.
121	7.2.5	7.2.5 Training content and schedule must be made available by RSPO.
122	7.2.5	<p>"7.2.5</p> <p>In more detail, workers must have attended special training"</p>

#	Indicator	Comment (English)
123	7.3	<p>"The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment.</p> <p>Farming practices need to be guided to help the unit of certification in an operational way.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers."</p>
124	7.3	<p>"Delete this indicator. Do not dilute the criterion.</p> <p>New plantings and/or development on marginal and/or fragile soil is prohibited."</p>
125	7.3.1	7.3.1 This indicator should list the types of fragile soils and slope limits
126	7.3.1	A clear and public monitoring system must be put in place to clearly indicate steep terrain and other risk areas, including GPS coordinates
127	7.3.1	"A clear and public monitoring system must be put in place to clearly indicate steep terrain and other risk areas, including GPS coordinates"
128	7.3.1	which includes for example:
129	7.3.2	7.3.2. This is arbitrary, what if certain countries legally allow planting in steep terrain?
130	7.3.2	A clear and public monitoring system must be put in place to clearly indicate steep terrain and other risk areas, including GPS coordinates
131	7.3.2	<p>"Indicator 7.3.2 Proposed:</p> <p>The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure""</p> <p>"</p>
132	7.3.2	In indicators 7.3.2 The phrase "Planting and/or New Development" is proposed to be changed to "new planting including the development of supporting infrastructure"
133	7.3.2	Proposed Indicator 7.3.2: The phrase "Planting and/or New Development" was changed to "New Planting including the Development of Supporting Infrastructure"

#	Indicator	Comment (English)
134	7.3.2	"Proposed Indicator 7.3.2: - The phrase ""Planting and/or New Development"" was changed to ""New Planting including the Development of Supporting Infrastructure"". "
135	7.3.2	"Proposed 7.3.2: The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure"" "
136	7.3.2	Proposed Indicator 7.3.2: Sentence "Planting and/or New Development" Corrected into "New Planting Including the Development of Supporting Infrastructure"
137	7.3.2	"Indicator 7.3.2 Proposal: The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure"" "
138	7.3.2	"Proposed Indicator 7.3.2: The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure"" "
139	7.3.2	"7.3.2 - The sentence ""planting and/or new development"" was changed to ""new planting including the development of supporting infrastructure"" "
140	7.3.2	The phrase "Planting and/or New Development" was changed to "new planting including the development of supporting infrastructure"
141	7.3.2	The phrase "Planting and/or New Development" was changed to "new planting including the development of supporting infrastructure"
142	7.3.2	"The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure"" "
143	7.3.2	Proposed Indicator 7.3.2: Sentence "Planting and/or New Development" Corrected into "New Planting Including the Development of Supporting Infrastructure"

#	Indicator	Comment (English)
144	7.3.2	Indicator 7.3.2 (c) Proposed to: The phrase "planting and/or new development" was changed to "new planting including the development of supporting infrastructure".
145	7.3.2	Indicator 7.3.2 Proposal: The phrase "Planting and/or New Development" was changed to "New Planting including the Development of Supporting Infrastructure"
146	7.3.2	Specify the definition of steep.
147	7.3.2	Specify until the steep boundary, so that the palm grower is clear, as well as the auditor
148	7.3.3	we're concerned that the wording of these indicators 7.3.3 and 7.3.4 has been weakened, and that this combined with the new definition of marginal and fragile soils and specified allowed hectarage for clearance that the P+C may allow more leniency for planting on fragile and marginal soils. Suggest keeping previous wording of 'no' planting rather than 'avoid'. Also this keep reference to 'planting' rather than only 'replanting'. Not clear under which circumstances it is acceptable that limited replanting 'is occurring' - this indicator seems both to say that it should not happen, and accept that it does happen anyway, which makes the intention unclear. Would be clearer and more auditable to have strong position that this clearing is not allowed.
149	7.3.3	7.3.3 What is the definition of limited planting? This indicator should be very specific so that it deters plantings on wetlands, acid sulfate soils, karst basement areas, sandstone basements, podzolised siliceous sand (spodosols), and ultramafic soils are some examples. Over applications of inorganic fertilizers should be deterred.
150	7.3.3	"Indicator 7.3.3 Proposed: The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure"" "
151	7.3.3	Proposed Indicator 7.3.3: Sentence "Planting and/or New Development" was changed to "New Planting including the Development of Supporting Infrastructure"
152	7.3.3	7.3.3 It is necessary to determine the limitations of the area that is more standard and has the right reference basis to be called a limited new planting.
153	7.3.3	In indicator 7.3.3 for the phrase "planting and/or new development" was changed to "new planting including the development of supporting infrastructure"
154	7.3.3	"Proposed indicator 7.3.3: The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure"" "
155	7.3.3	Proposed Indicator 7.3.3: Sentence "Planting and/or New Development" Corrected into "New Planting Including the Development of Supporting Infrastructure"

#	Indicator	Comment (English)
156	7.3.3	"Proposed indicator 7.3.3: - The phrase ""Planting and/or New Development"" was changed to ""New Planting including the Development of Supporting Infrastructure"". "
157	7.3.3	"Proposed 7.3.3: The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure"" "
158	7.3.3	Indicator 7.3.3 Proposed to: The phrase "Planting and/or New Development" was changed to "New Planting including the Development of Supporting Infrastructure"
159	7.3.3	"Indicator 7.3.3 Proposal: The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure"" "
160	7.3.3	"The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure"" "
161	7.3.3	Indicator 7.3.3 Proposed to: The phrase "Planting and/or New Development" was changed to "New Planting including the Development of Supporting Infrastructure"
162	7.3.3	"7.3.3 - The sentence ""planting and/or new development"" was changed to ""new planting including the development of supporting infrastructure"" "
163	7.3.3	The phrase "Planting and/or New Development" was changed to "new planting including the development of supporting infrastructure"
164	7.3.3	Indicator 7.3.3 Proposed to: The phrase "Planting and/or New Development" was changed to "New Planting including the Development of Supporting Infrastructure"
165	7.3.4	7.3.4 Are definitions in this document, such as limited replanting, considered normative?

#	Indicator	Comment (English)
166	7.3.4	Organic matter when possible must be compostable to generate material that can be used on plantations (EFB) Methane from POME must be captured to prevent release into the atmosphere - and potentially create energy from it The RSPO should provide clear guidelines of the technical possibilities for the mills with an idea of timeline and budget so that the unit of certification can be better supported on these sites - and know which actions are prioritized
167	7.3.4	"Organic matter when possible must be compostable to generate material that can be used on plantations (EFB) Methane from POME must be captured to prevent release into the atmosphere - and potentially create energy from it The RSPO should provide clear guidelines of the technical possibilities for the mills with an idea of timeline and budget so that the unit of certification can be better supported on these sites - and know which actions are prioritized"
168	7.3.4	"Organic matter when possible must be compostable to generate material that can be used on plantations (EFB) Methane from POME must be captured to prevent release into the atmosphere - and potentially create energy from it. The RSPO should provide clear guidelines of the technical possibilities for the mills with an idea of timeline and budget so that the unit of certification can be better supported on these sites - and know which actions are prioritized"
169	7.3.4	"Indicators are replaced with indicators at RSPO P&C 2018 namely ""7.5.2 Recipping Palm Oil carried out extensively on steep sloped land according to applicable regulations """
170	7.3.4	7.3.4 It is necessary to determine the limitations of the area that is more standard and has the right reference basis to be called a limited replanting.
171	7.3.4	7.3.4: The indicator is replaced with indicators at the 2018 RSPO P&C namely "7.5.2 Re -planting oil palm is not carried out extensively on steep sloped land according to applicable regulations"
172	7.3.4	"Proposed changes in indicators 7.3.4: Palm oil replanting is not carried out extensively on steep sloped land according to applicable regulations "" Proposed indicators are returned and equated with indicators at RSPO P&C 2018 which is 7.5.2"
173	7.3.5	A clear and public monitoring system must be put in place to clearly indicate peat terrain, including GPS coordinates
174	7.3.5	7.3.5 How is this going to be demonstrated in terms of auditability?

#	Indicator	Comment (English)
175	7.4	<p>""A system of verification audits and sanctions must be put in place as a priority to avoid any breach of this criterion.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers.""</p>
176	7.4	<p>"A system of verification audits and sanctions must be put in place as a priority to avoid any breach of this criterion.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers."</p>
177	7.4.1	<p>Make a stronger case to stop replanting after harvest cycle is over. Replanting in peatland is undesirable for climate, environment and also plantation productivity. These could be good areas for rewetting and restoration. We would like to suggest to RSPO to start working on restoration on those places where it has less impact on yield, in the long term, like the steep terrain and peatland.</p>
178	7.4.1	<p>"Indicator 7.4.1 Proposed: The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure""</p>
179	7.4.1	<p>In order to clarify the definition of new planting, new development and supporting supporting infrastructure.</p>
180	7.4.1	<p>In indicators 7.4.1 The sentence "planting and/or new development" was changed to "new planting including the development of supporting infrastructure"</p>
181	7.4.1	<p>Indicator 7.4.1 (c) is proposed to: The phrase "planting and/or new development" is changed to "new planting including the development of supporting infrastructure".</p>
182	7.4.1	<p>"Proposed 7.4.1 (c): The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure""</p>

#	Indicator	Comment (English)
183	7.4.1	"Indicator 7.4.1 (c) is proposed for: The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure""."
184	7.4.1	Indicator 7.4.1 (c) is proposed to: The phrase "planting and/or new development" is changed to "new planting including the development of supporting infrastructure".
185	7.4.1	"Proposed Indicator 7.4.1: - The phrase ""Planting and/or New Development"" was changed to ""New Planting including the Development of Supporting Infrastructure""."
186	7.4.1	Indicator 7.4.1 (c) is proposed to: The phrase "planting and/or new development" is changed to "new planting including the development of supporting infrastructure".
187	7.4.1	"Indicator 7.4.1 Proposal: The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure"""
188	7.4.1	"Proposed 7.4.1. In order to clarify the definition of new planting, new development and and infrastructure development supporters."
189	7.4.1	"Proposed Indicator 7.4.1: The phrase ""Planting and/or New Development"" was changed to ""new planting including the development of supporting infrastructure"""
190	7.4.1	The phrase "Planting and/or New Development" was changed to "new planting including the development of supporting infrastructure"
191	7.4.1	Indicator 7.4.1 (c) is proposed to: The phrase "planting and/or new development" is changed to "new planting including the development of supporting infrastructure".
192	7.4.1	7.4.1. In order to clarify the definition of new planting, new development and supporting supporting infrastructure.
193	7.4.2	"Why was "shall" added? The older version is stronger: "There is no new planting (...)" "
194	7.4.2	"A clear and public monitoring system must be put in place to clearly indicate peat terrain, including GPS coordinates "

#	Indicator	Comment (English)
195	7.4.2	<p>""The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment.</p> <p>Farming practices need to be guided to help the unit of certification in an operational way.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers.""</p>
196	7.4.2	The deadline for re-submitting peat inventory to RSPO Secretariat on November 5, 2023.
197	7.4.2	7.4.2 The results of the mapping and inventory of peat have and will continue to be reported to the RSPO regularly, so the certification unit does not need to report it through the Certification Agency.
198	7.4.2	The deadline for re-submitting peat inventory to RSPO Secretariat on November 5, 2023.
199	7.4.3	In indicators 7.4.3 there should be an exception to accommodate interests other than companies (for example government) in the construction of waterways, roads, dams, dikes, embankments, and/or electric lines.
200	7.4.3	Indicator 7.4.3 (c) is proposed to: The construction of waterways, roads, dams, dikes, embankments, and/or electric paths other than company interests (government interests) are allowed.
201	7.4.3	Proposed Indicator 7.4.3: Construction of waterways, roads, dams, dikes, embankments, and/or electric lines other than company interests (government interests) are allowed
202	7.4.3	Exceptions at 7.4.5.
203	7.4.3	<p>"7.4.3 Proposed to add sentences to this indicator, as follows:</p> <p>Every infrastructure development in the work area of the certification unit that is not related to the operational activities of the certification unit (for example: government projects, public facilities, etc.) is not seen as a violation of this indicator ----> adaptation from RSPO P&C 2020 Interpretation Indonesia.</p> <p>"</p>
204	7.4.3	Development is not for the benefit of corporations (non-corporate land clearance) can be re-entered
205	7.4.3	"Proposal: for development not for the interests of corporations (non-corporate land clearance) can be re-entered"

#	Indicator	Comment (English)
206	7.4.3	"Proposed Indicator 7.4.3: - Development of waterways, roads, dams, embankments, embankments, and/or electric lines in addition to the interests of companies (government interests) are allowed."
207	7.4.3	Indicator 7.4.3 (c) is proposed to: The construction of waterways, roads, dams, dikes, embankments, and/or electric paths other than company interests (government interests) are allowed.
208	7.4.3	Indicator 7.4.3 Proposed: construction of waterways, roads, dams, dikes, embankments, and/or electric lines other than company interests (government interests) are allowed
209	7.4.3	7.4.3 - The construction of waterways, roads, dams, embankments, embankments, and/or electric paths other than company interests (government interests) are allowed
210	7.4.3	Indicator 7.4.3 (c) is proposed to: The construction of waterways, roads, dams, dikes, embankments, and/or electric paths other than company interests (government interests) are allowed.
211	7.4.3	Proposed Indicator 7.4.3: Construction of waterways, roads, dams, dikes, embankments, and/or electric lines other than company interests (government interests) are allowed
212	7.4.3	Proposed for indicators 7.4.3: Exceptions in the conditions mentioned in the indicator 7.4.5.
213	7.4.3	"Indicator 7.4.3 Proposal: Construction of waterways, roads, dams, dikes, embankments, and/or electric lines in addition to the interests of the company (government interests) are allowed"
214	7.4.3	for development not for the interests of corporations (non-corporate land clearance) can be re-entered
215	7.4.3	"Proposed Indicator 7.4.3: Construction of waterways, roads, dams, dikes, embankments, and/or electric lines in addition to the interests of the company (government interests) are allowed"
216	7.4.3	7.4.3: Exception at 7.4.5.
217	7.4.3	"Proposed 7.4.3: Construction of waterways, roads, dams, dikes, embankments, and/or electric lines in addition to the interests of the company (government interests) are allowed"
218	7.4.3	"Indicator 7.4.3 (c) Proposed: Construction of waterways, roads, dams, dikes, embankments, and/or electric lines in addition to the interests of the company (government interests) are allowed"
219	7.4.4	7.4.4. Undeveloped is a better alternative to 'unplanted'.
220	7.4.4	A clear and public monitoring system must be put in place to clearly indicate peat terrain, including GPS coordinates

#	Indicator	Comment (English)
221	7.4.6	7.4.6. This entire indicator is confusing. The timeline for drainability assessment is confusing please reword this.
222	7.4.6	<p>"The RSPO must carry out studies and convene panels of experts every year to define clear and relevant guidelines, depending on the type of plantation and geographical area, on the best agricultural practices for workers' health and the environment. Farming practices need to be guided to help the unit of certification in an operational way. New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers."</p>
223	7.4.6	<p>"7.4.6 • Drainability assessment can actually conflict with conditions in the field, where the certification unit still has a legal permit to land use (HGU) in a long period of time but becomes unable to reinstate in peat because based on the results of drainability assessment it is not possible for Re -planting.</p> <ul style="list-style-type: none"> • Please consideration to impose drainability assessment procedures version 2, where this procedure is very scientific, requires time allocation, human resources and costs to conduct field surveys related to the height and thickness of peatland to get primary data • Cultivation on peatlands that do not damage the environment can be done by applying the best cultivation practices on peatlands according to the RSPO guide. Even if there is a desire from the certification unit to carry out drainage assessment activities, the results should be intended for recommendations for BMP improvement in the replanting area, not to stop planting <p>With the above consideration, it is proposed to delete the drainability assessment requirements from the indicator.</p> <p>"</p>
224	7.4.7	<p>"A system of verification audits and sanctions must be put in place as a priority to avoid any breach of this criterion.</p> <p>New agricultural systems less oriented towards monoculture and more towards the diversification of plant species must be favored.</p> <p>The RSPO must help the plantations to turn to its new agricultural practices more in line with global warming, the preservation of the environment and with the mitigation of the risk of pest / disease - while maintaining high yields and therefore ensuring income to producers."</p>
225	7.4.7	7.4.7. This is wishful thinking, most companies would just abandon the site. The effectiveness of this indicator needs to be reviewed.

#	Indicator	Comment (English)
226	7.4.8	7.4.8 This is another vague indicator with audit difficulties. What should we focus on?
227	7.4.9	7.4.9. What is the accepted peat subsidence? It should be stated clearly rather than making a reference to the BMP.
228	7.4.9	The wording of the older version has been stronger and more clear "No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly."
229	7.4.9	The first phrase in 7.4 can be made stronger as follows: The UoC shall not conduct land clearing or new planting on peat regardless of depths, after November 2018.
230	7.4.9	7.4.9. What is meant by ground cover management?
231	7.5	"The mill must be encouraged to create retention basins for its POME. All POME must be treated with return to nature. The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy"
232	7.5	We should be indeed doing our best to prevent ground water contamination or pollution
233	7.5	""The mill must be encouraged to create retention basins for its POME. All POME must be treated with return to nature. The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy"" "
234	7.5	"Suggest to revise the wording of the indicator on management of waste water. For e.g. The water management plan should avoid contamination of surface and ground water through...including the treatment of wastewater such as POME, sewage and other wastewater, in accordance with national legislation. [Issue: there is a lack of management of wastewater in the fields, such as POME, sewage and other wastewater that may impact on surface and groundwater quality]."
235	7.5.1	7.5.1 Guidance on the structure of the water management plan should be provided.
236	7.5.1	wrong link
237	7.5.1	should refer to 7.5.2. There is no indicator 7.6.2
238	7.5.1	Past activities after November 2018 or any other timeline?
239	7.5.1	Riparian

#	Indicator	Comment (English)
240	7.5.1	"Protect natural water flow, river border, and Other buffer zones* (see 7.6.2); Should refer at 7.5.2. Because there is no indicator 7.6.2."
241	7.5.1	7.5.1 This indicator is too detailed. It is recommended to make the indicator to be more simple, where other detailed things are included in the guide only
242	7.5.1	7.5.1: Protects natural water flow, river borders, and other buffer zones* (see 7.6.2); Should refer at 7.5.2. Because there is no indicator 7.6.2.
243	7.5.1	"Proposed 7.5.1: Protecting natural water flow, river borders, and other supporting zones* (see 7.6.2); Should refer at 7.5.2. Because there is no indicator 7.6.2."
244	7.5.2	Indicator 7.5.2 (c) Proposed to adopt the latest guidelines issued by the RSPO Secretariat July 2022, so that the sentence becomes "if there are no national regulations/guidelines, then the RSPO guide on the best management practices for management and rehabilitation of Riparian Nature Reserve and river border management in Indonesian oil palm plantations "
245	7.5.2	In indicators 7.5.2 it is proposed to adopt the latest guidelines issued by the RSPO Secretariat July 2022, so that the sentence becomes "if there are no national regulations/guidelines, then the RSPO guide on the best management practices for the management and rehabilitation of Riparian Nature Reserve and river border management in coconut plantations Indonesian palm "
246	7.5.2	The latest guide can adopt the issued of the RSPO Secretariat July 2022 concerning the Management of River Borders in Palm Oil Plantation in Indonesia
247	7.5.2	Proposed Indicator 7.5.2: In order to adopt the latest guidelines that had previously been issued by the RSPO Secretariat in July 2022, so that the sentence became "if there are no national regulations/guidelines, then the RSPO guide about the best management practices for management and rehabilitation of Riparian Nature Reserve and river border management in Indonesian oil palm plantations "
248	7.5.2	In order to add a reference to the latest guidelines issued by the RSPO Secretariat July 2022 concerning the Management of River Borders in Palm Oil Plantation in Indonesia.
249	7.5.2	"Proposed Indicator 7.5.2: It is proposed to adopt the latest guidelines issued by the RSPO Secretariat July 2022, so that the sentence becomes ""if there are no national regulations/guidelines, then the RSPO guide on the best management practices for the management and rehabilitation of Riparian Nature Reserve and river border management in Indonesian oil palm plantations""

#	Indicator	Comment (English)
250	7.5.2	"Indicator proposal 7.5.2 is proposed to adopt the latest guidelines for managing riparian that are not determined by government in palm oil plantation in Indonesia issued For the management and rehabilitation of the Riparian Nature Reserve and river border management in the Indonesian Palm Oil Plantation Managing Riparian that are not determined by government in palm oil plantation in Indonesia 2022. "
251	7.5.2	Indicator 7.5.2 (c) Proposed to: Adopt the latest guidelines issued by the RSPO Secretariat July 2022, so that the sentence becomes "if there are no national regulations/guidelines, then the RSPO guide about the best management practices for management and rehabilitation of Riparian Nature Reserve and river border management in Indonesian oil palm plantations ".
252	7.5.2	Indicator 7.5.2 (c) Proposed to: Adopt the latest guidelines issued by the RSPO Secretariat July 2022, so that the sentence becomes "if there are no national regulations/guidelines, then the RSPO guide about the best management practices for the management and rehabilitation of the Riparian Nature Reserve and river border management in Indonesian oil palm plantations ".
253	7.5.2	"Proposed Indicator 7.5.2: - It is proposed to adopt the latest guidelines issued by the RSPO Secretariat July 2022, so that the sentence becomes ""if there are no national regulations/guidelines, then the RSPO guide on the best management practices for the management and rehabilitation of the Riparian Nature Reserve and river border management in Indonesian oil palm plantations""."
254	7.5.2	Indicator 7.5.2 (c) Proposed to: Adopt the latest guidelines issued by the RSPO Secretariat July 2022, so that the sentence becomes "if there are no national regulations/guidelines, then the RSPO guide about the best management practices for management and rehabilitation of Riparian Nature Reserve and river border management in Indonesian oil palm plantations ".
255	7.5.2	7.5.2 - Proposed to adopt the latest guidelines issued by the RSPO Secretariat July 2022, so that the sentence becomes "if there are no national regulations/guidelines, then the RSPO guide on the best management practices for the management and rehabilitation of the Riparian Nature Reserve and river border management in the coconut plantation Indonesian palm "
256	7.5.2	"Proposed Indicator 7.5.2: To be able to adopt the latest guidelines issued by the Secretariat of the RSPO July 2022 regarding the management of river borders in oil palm plantations in Indonesia"
257	7.5.2	7.5.2: In order to add a reference for the latest guidelines issued by the RSPO Secretariat July 2022 concerning the Management of River Borders in Palm Oil Plantation in Indonesia.
258	7.5.2	"Indicator 7.5.2 Proposal: It is proposed to adopt the latest guidelines issued by the RSPO Secretariat July 2022, so that the sentence becomes ""if there are no national regulations/guidelines, then the RSPO guide on the best management practices for the management and rehabilitation of Riparian Nature Reserve and river border management in Indonesian oil palm plantations"""

#	Indicator	Comment (English)
259	7.5.2	"Proposed for 7.5.2 (c): It is proposed to adopt the latest guidelines issued by the RSPO Secretariat July 2022, so that the sentence becomes ""if there are no national regulations/guidelines, then the RSPO guide on the best management practices for the management and rehabilitation of Riparian Nature Reserve and river border management in Indonesian oil palm plantations"""
260	7.5.2	Indicator 7.5.2 Proposed: Proposed to adopt the latest guidelines issued by the RSPO Secretariat July 2022, so that the sentence becomes "if there are no national regulations/guidelines, then the RSPO guide on the best management practices for the management and rehabilitation of the Riparian Nature Reserve and river border management in the plantation Indonesian palm oil "
261	7.5.2	"Proposal: To be able to adopt the latest guidelines issued by the Secretariat of the RSPO July 2022 regarding the management of river borders in oil palm plantations in Indonesia"
262	7.5.3	"Suggest to broaden the scope in ensuring no negative impacts on users AND natural environment; particularly in the context of future higher demand for irrigation which may impact HCVs negatively; e.g., Increase of water pumping for irrigation purposes could result in biodiversity loss, unfair distribution of water across ecosystems, etc.). Note: When irrigation is used, the relevant legislation is being complied with. [It is currently stated that a water management plan shall be developed and implemented to avoid negative impacts on other users in the catchment. The water management plan aims to ensure efficiency of use, continued availability of water sources , only on human use of water but not on the natural environment. As climate warms up, there will be more interest in using irrigation in existing oil palm plantations (used extensively in India, in parts of Thailand) and that is not touched at all in this criterion]"
263	7.5.3	7.5.3 What is the definition of restoration here? What do you mean by "semi-natural state"? Can oil palm be maintained?
264	7.5.3	Proposed Indicator 7.5.3: Disagree with the new indicator because it has been arranged in RACP (Annex 5 P&C 2018 Refer)
265	7.5.3	"Proposed indicator 7.5.3: Disagree with the new indicator because it has been arranged in RACP (Annex 5 P&C 2018 referral)"
266	7.5.3	Indicator 7.5.3: This indicator is no longer necessary, because it has been covered in indicator 7.5.2 (management program)
267	7.5.3	Indicator 7.5.3: This indicator is no longer necessary, because it has been covered in indicator 7.5.2 (management program)
268	7.5.3	"Indicator proposal 7.5.3 is removed due to the mechanism Restoration/Remediation has been regulated in RACP (Annex Refer 5 P&C 2018) with Cut Off Date 2005."
269	7.5.3	Proposed: Disagree with the new indicator because it has been arranged in RACP (Annex 5 P&C 2018 Refer)
270	7.5.3	For indicators 7.5.3 Disagree and proposed to be deleted because it has been arranged in RACP (Annex 5 P&C 2018 Refer)

#	Indicator	Comment (English)
271	7.5.3	"Proposed indicator 7.5.3: - Proposed indicator is deleted, because it has been arranged in RACP (Annex 5 RSPO P&C 2018 Refer). Annex 5 RSPO P&C 2018 proposal is still adopted in P&C 2023"
272	7.5.3	"Proposed indicator 7.5.3: - Disagree with the new indicator because it has been arranged in RACP (Annex 5 RSPO P&C 2018 refer."
273	7.5.3	"Indicator 7.5.3 Proposed: Disagree with the new indicator because it has been arranged in RACP (Annex 5 P&C 2018 referral)"
274	7.5.3	"Indicator 7.5.3 is proposed to: Disagree with the new indicator because it has been arranged in RACP (Annex 5 P&C 2018 refer."
275	7.5.3	"Indicator 7.5.3 Proposal: Disagree with the new indicator because it has been arranged in RACP (Annex 5 P&C 2018 referral)"
276	7.5.3	7.5.3 - Disagree with the new indicator because it has been regulated in RACP (Annex 5 P&C 2018 Refer)
277	7.5.3	"Proposed 7.5.3: Disagree with the new indicator because it has been arranged in RACP (Annex 5 P&C 2018 referral)"
278	7.5.3	Indicator 7.5.3 Proposal: Disagree with the new indicator because it has been arranged in RACP (Annex 5 P&C 2018 Refer)
279	7.5.3	Disagree with the new indicator because it has been arranged in RACP (Annex 5 P&C 2018 referral)
280	7.5.3	Proposed indicator 7.5.3: Disagree with the new indicator because it has been arranged in RACP (Annex 5 P&C 2018 refer).
281	7.5.3	"Proposal: Disagree with the new indicator because it has been arranged in RACP (Annex 5 P&C 2018 referral)"
282	7.5.3	7.5.3: The indicator is removed because the mechanism of restoration/remediation has been regulated in the RACP (Annex 5 P&C 2018 refer) with a 2005 cut off date.
283	7.5.4	The indicator is replaced with the 2018 P&C indicator, namely, "7.8.3 PKS liquid waste is managed according to applicable regulations. The quality of the PKS liquid waste that is discarded, especially BOD (Biochemical Oxygen Demand) is monitored regularly according to applicable regulations "
284	7.5.4	The indicator proposal 7.5.3 is removed because the mechanism of restoration/remediation has been regulated in the RACP (Annex 5 P&C 2018 Refer) with Cut Off Date 2005.
285	7.5.4	"7.5.4: Indikator diganti dengan Indikator P&C 2028 yaitu, "7.8.3 Limbah cair PKS dikelola sesuai peraturan yang berlaku. Kualitas limbah cair PKS yang dibuang, khususnya BOD (Biochemical Oxygen Demand) dipantau secara berkala sesuai peraturan yang berlaku""

#	Indicator	Comment (English)
286	7.5.4	"7.5.4: The indicator is replaced with the P&C 2028 indicator, namely, ""7.8.3 PKS liquid waste is managed according to applicable regulations. The quality of the PKS liquid waste that is discarded, especially BOD (Biochemical Oxygen Demand) is monitored regularly according to applicable regulations """"
287	7.5.5	"The mill must be encouraged to create retention basins for its POME. All POME must be treated before returning to nature. The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy"
288	7.5.5	In indicators 7.5.5 the editor of the sentence should continue to use P&C 2018 Indicator 7.8.4 "PKS water use per ton TBS is monitored and recorded"
289	7.5.5	"Indicator 7.5.5 Proposed: The sentence still uses P&C 2018 Indicator 7.8.4 ""PKS water use per ton TBS is monitored and recorded"" "
290	7.5.5	"Proposed 7.5.5: The sentence still uses P&C 2018 Indicator 7.8.4 ""PKS water use per ton TBS is monitored and recorded"" "
291	7.5.5	"Indicators are replaced with the 2018 P&C indicator, namely, ""7.8.4 The use of PKS water per ton of FFB is monitored and recorded""""
292	7.5.5	The sentence still uses P&C 2018 Indicator 7.8.4 "PKS water use per ton TBS is monitored and recorded"
293	7.5.5	Indicator 7.5.5 is proposed to: The sentence still uses P&C 2018 Indicator 7.8.4 "PKS water use per ton TBS is monitored and recorded".
294	7.5.5	Indicator 7.5.5 is proposed to: The sentence still uses P&C 2018 Indicator 7.8.4 "PKS water use per ton TBS is monitored and recorded". (INA NI 2020)
295	7.5.5	"7.5.5: The indicator is replaced with the P&C 2028 indicator, namely, ""7.8.4 The use of PKS water per ton of FFB is monitored and recorded""""
296	7.5.5	The sentence still uses P&C 2018 Indicator 7.8.4 "PKS water use per ton TBS is monitored and recorded"
297	7.5.5	"Proposed indicator 7.5.5: - The sentence still uses P&C 2018 Indicator 7.8.4 ""PKS water use per ton TBS is monitored and recorded"". "
298	7.5.5	7.5.5 - The sentence still uses P&C 2018 Indicator 7.8.4 "PKS water use per ton TBS is monitored and recorded"

#	Indicator	Comment (English)
299	7.5.5	"Indicator 7.5.5 Proposal: The sentence still uses P&C 2018 Indicator 7.8.4 ""PKS water use per ton TBS is monitored and recorded"" "
300	7.5.5	Indicator 7.5.5 is proposed so that the sentence still uses P&C 2018 Indicator 7.8.4, namely "PKS water use per ton TBS is monitored and recorded"
301	7.5.5	Indicator 7.5.5 is proposed to: The sentence still uses P&C 2018 Indicator 7.8.4 "PKS water use per ton TBS is monitored and recorded".
302	7.5.5	Proposed Indicator 7.5.4: In order to keep using the sentence P&C 2018 Indicator 7.8.4 "PKS water use per ton TBS is monitored and recorded"
303	7.5.5	"Proposed indicator 7.5.5: The sentence still uses P&C 2018 Indicator 7.8.4 ""PKS water use per ton TBS is monitored and recorded"" "
304	7.5.5	"7.5.5: The indicator is replaced with the 2018 P&C indicator, namely, ""7.8.4 The use of PKS water per ton of FFB is monitored and recorded"""
305	7.5.5	7.5.5: The sentence still uses P&C 2018 Indicator 7.8.4 "PKS water use per ton TBS is monitored and recorded"
306	7.6	"The mill must be encouraged to create retention basins for its POME. All POME must be treated with return to nature. The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy These efforts must lead to a precise timeline with a strategic vision over 3-5 years of the projects to be implemented. The reduction plan must be made public with objective figures that can be verified by third parties"
307	7.6	"These efforts must lead to a precise timeline with a strategic vision over 3-5 years of the projects to be implemented. The reduction plan must be made public with objective figures that can be verified by third parties"

#	Indicator	Comment (English)
308	7.6	<p>"The mill must be encouraged to create retention basins for its POME.</p> <p>All POME must be treated with return to nature.</p> <p>The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy</p> <p>These efforts must lead to a precise timeline with a strategic vision over 3-5 years of the projects to be implemented.</p> <p>The reduction plan must be made public with objective figures that can be verified by third parties"</p>
309	7.6	<p>"The mill must be encouraged to create retention basins for its POME.</p> <p>All POME must be treated with return to nature.</p> <p>The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy</p> <p>These efforts must lead to a precise timeline with a strategic vision over 3-5 years of the projects to be implemented.</p> <p>The reduction plan must be made public with objective figures that can be verified by third parties"</p>
310	7.6	<p>These efforts must lead to a precise timeline with a strategic vision over 3-5 years of the projects to be implemented.</p>
311	7.6	<p>"The mill must be encouraged to create retention basins for its POME.</p> <p>All POME must be treated with return to nature.</p> <p>The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy</p> <p>These efforts must lead to a precise timeline with a strategic vision over 3-5 years of the projects to be implemented.</p> <p>The reduction plan must be made public with objective figures that can be verified by third parties"</p>

#	Indicator	Comment (English)
312	7.6	<p>"The mill must be encouraged to create retention basins for its POME.</p> <p>All POME must be treated with return to nature.</p> <p>The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy</p> <p>These efforts must lead to a precise timeline with a strategic vision over 3-5 years of the projects to be implemented.</p> <p>The reduction plan must be made public with objective figures that can be verified by third parties"</p>
313	7.6	<p>"The mill must be encouraged to create retention basins for its POME.</p> <p>All POME must be treated before returning to nature.</p> <p>The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy</p> <p>GHG emissions must be monitored and made accessible to relevant stakeholders, notably customers, to enable them to track their own GHG emissions across all scopes."</p>
314	7.6	<p>"The mill must be encouraged to create retention basins for its POME.</p> <p>All POME must be treated before returning to nature.</p> <p>The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy</p> <p>GHG emissions must be monitored and made accessible to relevant stakeholders, notably customers, to enable them to track their own GHG emissions across all scopes."</p>

#	Indicator	Comment (English)
315	7.6.1	<p>"The mill must be encouraged to create retention basins for its POME. All POME must be treated before returning to nature.</p> <p>The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy</p> <p>GHG emissions must be monitored and made accessible to relevant stakeholders, notably customers, to enable them to track their own GHG emissions across all scopes."</p>
316	7.6.1	<p>"Suggest to review GhG calculator and align with SBTi and GhG protocol, so that carbon claims can be generated. This also requires revision of the RSPO claims procedure. [The GHG calculator includes data of the entire company operations as well as the plantations that supply them including 3rd party FFB suppliers. The problem is that data from these 3rd party FFB suppliers are often either insufficient or poor then the company will therefore use defaults values or default estimates. The company can only get accurate data from their own estates]."</p>
317	7.6.1	<p>"The mill must be encouraged to create retention basins for its POME. All POME must be treated with return to nature.</p> <p>The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy</p> <p>These efforts must lead to a precise timeline with a strategic vision over 3-5 years of the projects to be implemented.</p> <p>The reduction plan must be made public with objective figures that can be verified by third parties"</p>
318	7.6.1	<p>"The mill must be encouraged to create retention basins for its POME. All POME must be treated before returning to nature.</p> <p>The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy</p> <p>GHG emissions must be monitored and made accessible to relevant stakeholders, notably customers, to enable them to track their own GHG emissions across all scopes."</p>

#	Indicator	Comment (English)
319	7.6.1	We suggest to not suggest continuing to ingrain fossil fuels into the industry. Instead, a plan to "phase out fossil fuels" should be made.
320	7.6.1	"The mill must be encouraged to create retention basins for its POME. All POME must be treated with return to nature. The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy "
321	7.6.1	"The mill must be encouraged to create retention basins for its POME. All POME must be treated with return to nature. The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy"
322	7.6.1	For indicators 7.6.1 the editorial of the sentence should continue to use P&C 2018 Indicator 7.9.1 "Plan to increase the efficiency of fossil fuel use and to optimize renewable energy available, monitored and documented"
323	7.6.1	Using the P&C 2018 indicator 7.9.1
324	7.6.1	Indicator 7.6.1 is proposed to: The sentence still uses P&C 2018 Indicator 7.9.1 "Plan to increase the efficiency of fossil fuel use and to optimize renewable energy available, monitored and documented".
325	7.6.1	"Proposed indicator 7.6.1: Sentence improvement into ""Plan to increase the efficiency of the use of fossil fuels and to optimize renewable energy available, monitored and documented"". (INA NI 2018) "
326	7.6.1	Proposed Indicator 7.6.1: In order to continue using P&C 2018 sentence Indicator 7.9.1 "Plan to improve the efficiency of fossil fuel use and to optimize renewable energy available, monitored and documented" "
327	7.6.1	"Proposed Indicator 7.6.1: - The sentence still uses P&C 2018 Indicator 7.9.1 ""Plan to improve the efficiency of fossil fuel use and to optimize renewable energy available, monitored and documented""."
328	7.6.1	7.6.1: The word "and reported" is deleted because it has been reported in the RSPO audit report every year.
329	7.6.1	Indicator 7.6.1: The word "and reported" is deleted because it has been reported in the RSPO audit report every year.

#	Indicator	Comment (English)
330	7.6.1	"Indicator 7.6.1 Proposal: The sentence still uses P&C 2018 Indicator 7.9.1 ""Plan to increase the efficiency of the use of fossil fuels and to optimize renewable energy available, monitored and documented"""
331	7.6.1	"Proposed 7.6.1: The sentence still uses P&C 2018 Indicator 7.9.1 ""Plan to increase the efficiency of the use of fossil fuels and to optimize renewable energy available, monitored and documented"""
332	7.6.1	7.6.1 - The sentence still uses P&C 2018 Indicator 7.9.1 "Plan to increase the efficiency of the use of fossil fuels and to optimize renewable energy available, monitored and documented" "
333	7.6.1	7.6.1: The sentence still uses P&C 2018 Indicator 7.9.1 "Plan to increase the efficiency of the use of fossil fuels and to optimize renewable energy available, monitored and documented"
334	7.6.1	"The word ""and reported"" was deleted because it had reported in the RSPO audit report every year."
335	7.6.1	"7.6.1 Proposed: The sentence still uses P&C 2018 Indicator 7.9.1 ""Plan to increase the efficiency of the use of fossil fuels and to optimize renewable energy available, monitored and documented"""
336	7.6.1	Indicator 7.6.1 is proposed to: The sentence still uses P&C 2018 Indicator 7.9.1 "Plan to increase the efficiency of fossil fuel use and to optimize renewable energy available, monitored and documented".
337	7.6.1	"Indicator 7.6.1: The word ""and reported"" is deleted because it has been reported in the RSPO audit report every year." "
338	7.6.1	7.6.1: The sentence still uses P&C 2018 Indicator 7.9.1 "Plan to increase the efficiency of the use of fossil fuels and to optimize renewable energy available, monitored and documented"
339	7.6.1	"Indicator 7.6.1 Proposed: The sentence still uses P&C 2018 Indicator 7.9.1 ""Plan to increase the efficiency of the use of fossil fuels and to optimize renewable energy available, monitored and documented"""

#	Indicator	Comment (English)
340	7.7	<p>"The mill must be encouraged to create retention basins for its POME.</p> <p>All POME must be treated with return to nature.</p> <p>The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy</p> <p>These efforts must lead to a precise timeline with a strategic vision over 3-5 years of the projects to be implemented.</p> <p>The reduction plan must be made public with objective figures that can be verified by third parties"</p>
341	7.7	<p>"Suggest to replace 'minimise and reduce GHG emissions' by accounting approach: 'estimate GHG emissions, set a target, plan actions and monitor toward a low GHG emissions target' OR if RSPO does not want to use the accounting approach , we would suggest 'identify the activities and resources used that are the main sources of GHG emissions and implement a plan to reduce emissions from these sources'.</p> <p>[>Distinguish between emissions from processing and emissions from growing plantations i.e. land use change >Clarify what does it mean MINIMIZE, as that could be interpreted in many different ways by an auditor and by a producer]."</p>
342	7.7	<p>"The mill must be encouraged to create retention basins for its POME.</p> <p>All POME must be treated with return to nature.</p> <p>The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy</p> <p>These efforts must lead to a precise timeline with a strategic vision over 3-5 years of the projects to be implemented.</p> <p>The reduction plan must be made public with objective figures that can be verified by third parties"</p>
343	7.7	<p>""""These efforts must lead to a precise timeline with a strategic vision over 3-5 years of the projects to be implemented.</p> <p>The reduction plan must be made public with objective figures that can be verified by third parties""</p> <p>"</p>

#	Indicator	Comment (English)
344	7.7	<p>""These efforts must lead to a precise timeline with a strategic vision over 3-5 years of the projects to be implemented.</p> <p>The reduction plan must be made public with objective figures that can be verified by third parties""</p> <p>"</p>
345	7.7.1	<p>"The mill must be encouraged to create retention basins for its POME.</p> <p>All POME must be treated before returning to nature.</p> <p>The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy</p> <p>GHG emissions must be monitored and made accessible to relevant stakeholders, notably customers, to enable them to track their own GHG emissions across all scopes."</p>
346	7.7.1	<p>"The mill must be encouraged to create retention basins for its POME.</p> <p>All POME must be treated before returning to nature.</p> <p>The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy</p> <p>GHG emissions must be monitored and made accessible to relevant stakeholders, notably customers, to enable them to track their own GHG emissions across all scopes."</p>
347	7.7.1	<p>"The mill must be encouraged to create retention basins for its POME.</p> <p>All POME must be treated with return to nature.</p> <p>The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy"</p>
348	7.7.1	<p>RSPO could require the monitoring and recording of water use for the activities that require the biggest volume of water – not just water use in palm oil processing. On-farm irrigation can be a large consumer of water and can have a detrimental effect on the surrounding environment. By monitoring, farmers develop a better understanding of their water use and can adjust practices to be more efficient and sustainable.</p>
349	7.7.1	<p>The mill must be encouraged to create retention basins for its POME. All POME must be treated with return to nature. The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy</p>
350	7.7.1	<p>[Sandakan, 21 June 2023] The use of fuel on genset in Sandakan estates are significant due to no electricity supply provided. Plans to minimise GHG emission would be difficult to these groups.</p>

#	Indicator	Comment (English)
351	7.7.1	"the current Language less strong than before, "7.8 Practices maintain the quality and availability of surface and groundwater." Demonstrate efforts vs. maintain quality ?? "
352	7.7.1	"In this 7.7.1 indicator there are several proposals, namely: - The sentence ""with the target of reducing the group"" was abolished - Editors of sentences as well as to protect the indicator version 7.10.1 P&C 2018, ""GHG emissions for the certification unit are identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator, and reported publicly.""
353	7.7.1	7.7.1 - Sentence "with the target of reducing the group" was abolished, and then to continue to use the indicator sentence 7.10.1 P&C 2018, "GHG emissions for the certification unit are identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator , and reported publicly. "
354	7.7.1	"7.7.1 What is meant by the GHG reduction target in the group? This should be removed because the entity that is the certification unit is not a company group. GRK reduction in groups can be obtained by RSPO through reporting GHK for each member in each audit period."
355	7.7.1	"The indicator is replaced with an indicator of 7.10.1 (P&C 2018) because P&C 2018 is quite clear and both include the requirements requested. P&C 2018, 7.10.1 (c) GHG Emissions are identified and assessed for the unit of certification. PLANS to Reduce or Minimise Them are implemented, monitored through the Palm GHG Calculator and Publicly Reported. Reporting and reducing GHG emission targets should not be applied exclusively using the Palm GHG Calculator RSPO. There are international methods that are recognized as GHG Protocol."
356	7.7.1	"Proposed Indicator 7.7.1: 1. sentence ""with a group reduction target"" abolished 2. Continue to use the sentence indicator 7.10.1 P&C 2018, ""GHG emissions for the certification unit are identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator, and reported publicly.""
357	7.7.1	"Proposed 7.7.1: - The sentence ""with the target of reducing the group"" was abolished - Propose indicator sentences to ""GHG emissions for certification units identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator, and reported publicly.""

#	Indicator	Comment (English)
358	7.7.1	"Proposed Indicator 7.7.1: - The sentence ""with the target of reducing the group"" was abolished - Continue to use the sentence indicator 7.10.1 P & C 2018, ""GHG emissions for the certification unit are identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator, and reported publicly.""
359	7.7.1	"Proposed Indicator 7.7.1: - The sentence ""with the target of reducing the group"" was abolished. - Continue to use the sentence indicator 7.10.1 P & C 2018, ""GHG emissions for the certification unit are identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator, and reported publicly""."
360	7.7.1	Proposed 7.7.1: - Sentence "with a group reduction target" abolished - Propose indicator sentences to "GHG emissions for certification units identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator, and reported publicly."
361	7.7.1	"Indicator 7.7.1 (c) is proposed for: 1. The sentence ""with a group reduction target"" was abolished. 2. Continue to use the sentence indicator 7.10.1 P&C 2018, ""GHG emissions for the certification unit are identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator, and reported publicly.""
362	7.7.1	"Indicator 7.7.1 Proposal: - The sentence ""with the target of reducing the group"" was abolished - Continue to use the sentence indicator 7.10.1 P & C 2018, ""GHG emissions for the certification unit are identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator, and reported publicly.""
363	7.7.1	Indicator 7.7.1 Proposal: - Sentence "with a group reduction target" abolished - Keep using the sentence Indicator 7.10.1 P&C 2018, "GHG emissions for the certification unit are identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator, and reported publicly. "
364	7.7.1	7.7.1 - Sentence "with the target of reducing the group" was abolished, and then to continue to use the indicator sentence 7.10.1 P&C 2018, "GHG emissions for the certification unit are identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator , and reported publicly. "
365	7.7.1	"Proposed 7.7.1 (c): - The sentence ""with the target of reducing the group"" was abolished - Continue to use the sentence indicator 7.10.1 P & C 2018, ""GHG emissions for the certification unit are identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator, and reported publicly.""

#	Indicator	Comment (English)
366	7.7.1	"7.7.1: The indicator is replaced with indicators 7.10.1 (P&C 2018) because P&C 2018 is quite clear and both have included the requested requirements. P&C 2018, 7.10.1 (c) GHG Emissions are identified and assessed for the unit of certification. PLANS to Reduce or Minimise Them are implemented, monitored through the Palm GHG Calculator and Publicly Reported. Reporting and reducing GHG emission targets so that it is not exclusively applied using the Palm GHG Calculator RSPO. There are international methods that are recognized as GHG Protocol."
367	7.7.1	"7.7.1: The indicator is replaced with an indicator 7.10.1 (P&C 2018) Because P&C 2018 is quite clear and both have includes the requested requirements. P&C 2018, 7.10.1 (C) GHG Emissions are identified and Assessed for the unit of certification. Plans to Reduce or minimise them are implemented, monitored through the Palm GHG Calculator and Publicly Reported. Reporting and Reduction of GHK Emission Targets as Serinya Not enforced exclusively using the Palm GHG Calculator RSPO. There are international methods that are recognized as GHG Protocol."
368	7.7.1	"Indicator 7.7.1 (c) Proposed: - The sentence ""with the target of reducing the group"" was abolished - Continue to use the sentence indicator 7.10.1 P & C 2018, ""GHG emissions for the certification unit are identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator, and reported publicly.""
369	7.7.1	"- The sentence ""with the target of reducing the group"" was abolished - Continue to use the sentence indicator 7.10.1 P & C 2018, ""GHG emissions for the certification unit are identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator, and reported publicly.""
370	7.7.1	"7.7.1: - Sentence ""with a group reduction target"" abolished - Continue to use the sentence indicator 7.10.1 P & C 2018, ""GHG emissions for the certification unit are identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator, and reported publicly.""
371	7.7.1	"1.) The sentence ""with the target of reducing the group"" was abolished. 2.) Continue to use the indicator sentence 7.10.1 P & C 2018, ""GHG emissions for the certification unit are identified and assessed. Plans to reduce or minimize GHG emissions are carried out, monitored through the PalmGHG Calculator, and reported publicly.""

#	Indicator	Comment (English)
372	7.7.3	"The mill must be encouraged to create retention basins for its POME. All POME must be treated before returning to nature. The RSPO must facilitate technical and financial access to the mill to a methane capture facility to guarantee treatment of this POME and the generation of carbon-free energy GHG emissions must be monitored and made accessible to relevant stakeholders, notably customers, to enable them to track their own GHG emissions across all scopes."
373	7.7.3	7.7.3 What would be the acceptable minimum content of this plan?
374	7.7.3	untuk indikator 7.7.3 ini sebaiknya dihapus, karena kriteria 7.7 hanya fokus mengatur terkait GRK
375	7.7.3	Indicators are deleted, because criteria 7.7 only focus on regulating GHK.
376	7.7.3	Proposed: Indicator 7.7.3 is deleted, because the criterion 7.7 only focus on regulating GHK
377	7.7.3	deleted, because criteria 7.7 only focus on regulating GHK related
378	7.7.3	Proposed Indicator 7.7.3: To be deleted, because the criterion 7.7 only focus on regulating GHK related
379	7.7.3	Proposed 7.7.3: Indicators are deleted, because it does not match the criteria 7.7 scope indicators related to GHG/GRK emissions. Irrelevant, pollution has been spoken in the indicator of waste management.
380	7.7.3	"Indicator 7.7.3 (c) is proposed for: Deleted, because criteria 7.7 only focus on regulating GHK."
381	7.7.3	"Proposal: deleted, because criteria 7.7 only focus on regulating GHK related"
382	7.7.3	7.7.3 - Proposal to be deleted, because the criteria 7.7 only focus on regulating GHK
383	7.7.3	Indicator 7.7.3 (c) Proposed: deleted, because criteria 7.7 only focus on regulating GHK related
384	7.7.3	7.7.3: The indicator is deleted, because the criterion 7.7 only focus on regulating GHK.
385	7.7.3	"Indicator 7.7.3 Proposal: deleted, because criteria 7.7 only focus on regulating GHK related"
386	7.7.3	"Proposed Indicator 7.7.3: - Deleted, because criteria 7.7 only focus on regulating GHK."
387	7.7.3	"Proposed 7.7.3: deleted, because criteria 7.7 only focus on regulating GHK related"

#	Indicator	Comment (English)
388	7.7.3	Indicator 7.7.3 (c) is proposed to: deleted, because the criterion 7.7 only focus on regulating GHK.
389	7.7.3	Proposed 7.7.3: deleted, because criteria 7.7 only focus on regulating GHK
390	7.7.3	Indicator 7.7.3 (c): proposed to be removed, because the criterion 7.7 only focus on regulating GHK.
391	7.7.3	7.7.3. This indicator should be removed, because the criteria of 7.7 are specific regarding the minimalization and reducing GHG emissions.
392	7.7.3	"7.7.3: The indicator is deleted, because the criterion is 7.7 only focus Regarding GHK."
393	7.7.3	7.7.3: Deleted, because criteria 7.7 only focus on regulating GHK
394	7.7.3	Indicator 7.7.3 (c) Proposed: deleted, because criteria 7.7 only focus
395	7.7.4	The non-use of fire on the plantations must be extremely well monitored on the plots with a clear educational process for workers and smallholders
396	7.7.4	"These efforts must lead to a precise timeline with a strategic vision over 3-5 years of the projects to be implemented. The reduction plan must be made public with objective figures that can be verified by third parties"
397	7.7.4	7.7.4 The definition of pollutants is required.
398	7.7.4	7.7.4 - Proposal so that this indicator is deleted, because the criterion 7.7 only focus
399	7.7.4	Pada indikator 7.7.4 ini diusulkan untuk dihapus, karena kriteria 7.7 hanya fokus mengatur terkait GRK tidak ada mengatur terkait pencemaran
400	7.7.4	Indicator 7.7.4: Proposed in the guidelines for indicators 7.7.4 It is stated that the report on development monitoring to reduce and minimize the source of pollution and their publication can be met through various environmental performance reports carried out by the certification unit (for example: reporting of each semester of RKL-RPL, reporting Every 3 months the use of liquid waste for land application land, etc.).
401	7.7.4	Proposed: Indicator 7.7.4 is proposed to be deleted, because the criterion 7.7 only focus
402	7.7.4	"The indicator is deleted, because the criterion 7.7 is only focused Regarding GHK."
403	7.7.4	Proposed 7.7.4: Indicator 7.7.4 is proposed to be deleted, because the criterion 7.7 only focuses on indicators related to GHG/GHG emissions do not regulate significant pollution ... not relevant.
404	7.7.4	Indocator proposal 7.7.4: This indicator is proposed to be deleted, because the criterion 7.7 only focusing on regulating GHK does not exist regulating the pollution.
405	7.7.4	7.7.4 - Proposal so that this indicator is deleted, because the criterion 7.7 only focus
406	7.7.4	7.7.4 - Proposal so that this indicator is deleted, because the criterion 7.7 only focus

#	Indicator	Comment (English)
407	7.7.4	"7.7.4: The indicator is deleted, because the criterion is 7.7 only focus Regarding GHK. "
408	7.7.4	This indicator is proposed to be deleted, because the criterion 7.7 only focusing on regulating the GHK does not regulate the regarding pollution
409	7.7.4	"Proposed indicator 7.7.4: - This indicator is proposed to be deleted, because the criterion 7.7 only focus on regulating the GHK does not regulate regarding pollution."
410	7.7.4	Indicator 7.7.4 is proposed in order to: This indicator is deleted, because the criteria 7.7 only focusing on regulating GHK does not regulate the regarding pollution.
411	7.7.4	Indicator 7.7.4 is proposed to be deleted, because the criteria 7.7 only focusing on regulating GHK does not regulate regarding pollution.
412	7.7.4	"Indicator 7.7.4 'Proposal: This indicator is proposed to be deleted, because the criterion 7.7 only focusing on regulating the GHK does not regulate the regarding pollution"
413	7.7.4	"7.7.4: The indicator is deleted, because the criterion is 7.7 only focus Regarding GHK. "
414	7.7.4	7.7.4. This indicator should be removed, because the criteria of 7.7 are specific regarding the minimalization and reducing GHG emissions.
415	7.7.4	""Proposed 7.7.4: This indicator is proposed to be deleted, because the criterion 7.7 only focusing on regulating the GHK does not regulate the regarding pollution"
416	7.7.4	7.7.4: Indicators are deleted, because criteria 7.7 only focus on regulating GHK.
417	7.7.4	""Proposed 7.7.4: This indicator is proposed to be deleted, because the criterion 7.7 only focusing on regulating the GHK does not regulate the regarding pollution"
418	7.7.4	7.7.4: This indicator is proposed to be deleted, because the criterion 7.7 only focus

#	Indicator	Comment (English)
419	7.7.4	"Indicator 7.7.4 Proposed: This indicator is proposed to be deleted, because the criterion 7.7 only focusing on regulating the GHK does not regulate the regarding pollution"
420	7.7.4	"The inclusion of this indicator, I consider that it is worth specifying it, like this: ""The Certification Unit will monitor progress towards the reduction and/or minimization of the identified GHG pollutants and will publish a summary of the progress achieved together with the relevant management document of the certification unit.""
421	7.7.4	"The inclusion of this indicator, I consider that it is worth specifying it, like this: ""The certification unit will monitor progress towards the reduction and/or minimization of the identified GHG pollutants and will publish a summary of the progress achieved in the relevant management document of the certification unit.""
422	7.8.2	"The non-use of fire on the plantations must be extremely well monitored on the plots with a clear educational process for workers and smallholders"
423	7.8.2	We are in support of WWF's comment regarding: "Suggested criteria: Human wildlife conflict, (indirectly) driven by the cultivation of oil palm, is minimized by developing responsible management measures and damage is compensated to local communities if applicable. Suggested indicators: - management measures implemented to prevent/minimize HWC - number of HWC incidents Suggested : ToC outcomes: improved risk management, human rights upheld, ecosystems protected"

#	Indicator	Comment (English)
424	7.8.2	<p>"(Human Wildlife Conflict) HWC is only mentioned in 2018 Standard- Annex 2 - Guidance, which dilutes the importance of companies taking their responsibility to reduce conflicts. Since HWC is an issue of global concern with severe impact on local communities and wildlife, WWF advises RSPO to include language on HWC in the criteria themselves.</p> <p>Currently, RSPO mentions the following in Annex 2 - Guidance - Criteria 7.12 - Indicator 7.12.4. Developing responsible measures to resolve human-wildlife conflicts (e.g. incursions by elephants).</p> <p>We advise to include the following either in Principle 4: Respect community and human rights and deliver benefits or Principle 7: Protect, conserve and enhance ecosystems and the environment, as HWC concerns both local communities as wildlife.</p> <p>Suggested criteria: Human wildlife conflict, (indirectly) driven by the cultivation of oil palm, is minimized by developing responsible management measures and damage is compensated to local communities if applicable.</p> <p>Suggested indicators: - management measures implemented to prevent/minimize HWC - number of HWC incidents</p> <p>Suggested : ToC outcomes: improved risk management, human rights upheld, ecosystems protected "</p>
425	7.9	<p>"The HCV or HCS risk zones must be clearly defined by GPS coordinates, be made public and be the matter of particular attention from the mills</p> <p>The RSPO must be able to transmit knowledge so that the unit of certification can increase its skills in understanding these areas with high environmental value.</p> <p>The mills are then required to provide this information in training to their workers but also to smallholders.</p> <p>The actions carried out in the field must be monitored and the results must be made accessible."</p>

#	Indicator	Comment (English)
426	7.9	<p>"The HCV or HCS risk zones must be clearly defined by GPS coordinates, be made public and be the matter of particular attention from the mills</p> <p>The RSPO must be able to transmit knowledge so that the unit of certification can increase its skills in understanding these areas with high environmental value.</p> <p>The mills are then required to provide this information in training to their workers but also to smallholders.</p> <p>The actions carried out in the field must be monitored and the results must be made accessible."</p>
427	7.9	<p>In order to enhance biodiversity and ecosystem services on palm oil plantations, "tree islands" shall be implemented and installed on the plantations, like in the recently published and stimulating study of Zemp et al. (2023). Tree islands enhance biodiversity and functioning in oil palm landscapes.</p>
428	7.9	<p>"Here is the link to the article just published in Nature: https://www.nature.com/articles/s41586-023-06086-5</p> <p>See also the News & Views written by Robert Nasi: https://www.nature.com/articles/d41586-023-01733-3</p> <p>and here is a podcast: https://www.nature.com/articles/d41586-023-01733-3"</p>
429	7.9	<p>Ideal Target is RSPO Deforestation free to be fully sustainable as a company as this is our responsibility but also to meet the new EU DR regulations.</p>
430	7.9	<p>"Welcome the addition of peatland and other conservation areas including RTE species and its important habitats in this criterion and also these areas shall be monitored. [incl. peatland and other conservation areas; including RTE species and its important habitats shall be monitored ...]."</p>
431	7.9	<p>"Comment for 7.9.7:</p> <p>First sentence: we suggest you remove the second mention of ""areas"" as suggested here : The UoC shall not cause deforestation or damage any areas required to protect and enhance HCVs, HCS forests, peatlands and other conservation areas.</p> <p>Second sentence: Remove first mention of ""areas"", remove ""important"" (all RTE species' habitats will be important) and revise punctuation as follows: Identified HCVs, HCS forests, peatland and other conservation areas, including RTE species and its habitats, shall be monitored, protected and/or enhanced.</p> <p>"</p>

#	Indicator	Comment (English)
432	7.9	The non-use of fire on the plantations must be extremely well monitored on the plots with a clear educational process for workers and smallholders
433	7.9.1	"Suggest (more directive language) that RSPO can insist that growers should have a plan towards a low GHG emissions target in their operation but also in their supply chain (aware of the most critical factors to be prioritising in their plans for reducing emissions). They should be distinguishing between different sources of emissions (emissions from palm oil mill effluent, emissions from nitrogen fertilizers, emissions from land use change). [This new monitoring indicator is too general. What is the target?]."
434	7.9.1	"These efforts must lead to a precise timeline with a strategic vision over 3-5 years of the projects to be implemented. The reduction plan must be made public with objective figures that can be verified by third parties "
435	7.9.3	7.9.3 PROCEDURAL NOTE: The "Annex 5" is not shared for consultation. If it is the same that was included in the 2018 P&C, it must be revised since several of the scenarios are no longer applicable (deadlines expired). A better reference would be the document "Interpretation of Indicator 7.12.2 and Annex 5 (P&C 2018)," but again, that document also has contents that are outdated (deadlines expired). If either document is used without an update it will cause confusion regarding the requirements.
436	7.9.3	7.93. Spelling error.
437	7.9.3	To make this indicator simple, the identification of HCV-HCS shall be guided by Annex 5 interpretation document. The reference for HCS is HCSA Version 1.
438	7.9.3	"We suggested before: - focusing 7.9.3. on UoCs planning new land clearings after 15 November 2018 - referring to ""satisfactory"" HCV-HCSA assessment report which is not the same as having conducted the assessment (the quality needs to be verified) - stating that clearing can only commence once the NPP (including outcomes of the satisfactory HCV-HCSA assessment report) and the Integrated Management Plan (IMP) have been approved."

#	Indicator	Comment (English)
439	7.9.3	<p>"We urge swift progress on finding a solution for HFCC. We would envision such a solution to be supportive of HFCC RSPO CSPO to allow for market access also to the EU, which means that some modular approach is needed to differentiate volumes in line with EUDR from volumes in line 'only' with RSPO HFCC provisions for local/smallholder/community production.</p> <p>RSPO should continue engaging with the EC around recognising HCV-HCS as an equivalent to the FAO definition & importance of HFCC provisions for equity for highly forested and less developed countries. [Currently, the indicators are not aligned with EUDR's FAO based definitions. As part of a modular EUDR compliant approach, we would envision a further indicator to be developed for interim use that is aligned with the EUDR FAO based definition]."</p>
440	7.9.3	<p>""The HCV or HCS risk zones must be clearly defined by GPS coordinates, be made public and be the matter of particular attention from the mills</p> <p>The RSPO must be able to transmit knowledge so that the unit of certification can increase its skills in understanding these areas with high environmental value.</p> <p>The mills are then required to provide this information in training to their workers but also to smallholders.</p> <p>The actions carried out in the field must be monitored and the results must be made accessible.""</p>
441	7.9.3	"7.9.3. Remove second phrase starting with ""This will include..."". Both HCV-HCSA TK and HCV-HCSA manual already require stakeholder consultation and wider landscape consideration. "
442	7.9.5	7.12.7 What happens if there is HCV loss in the certified unit? How is a status change accommodated? Where is the status change being damaged?
443	7.9.5	[Abidjan WS] 7.9.5 to include - The integrated management plan is made available and communicated with relevant stakeholders.
444	7.9.6	7.9.6 What if the local communities want, have given consent, and are supportive of oil palm development in these HCV/ HCS areas for the cause of poverty alleviation? Would their needs matter and exception to such cases?
445	7.9.6	Is there also room for improving status of monitored species? For example if it is found that better connectivity between HCV areas is needed for this species, should companies create this ecological corridor? Also if it means replacing some oil palm plantation with forest land? This links to our comments on restoration in peat and steep terrain. We suggest to create first steps for more biodiversity improvement (instead of only assesment and monitoring) in plantation landscapes such as oil palm.

#	Indicator	Comment (English)
446	7.9.6	"Agreed and it would be useful to link this more clearly with 7.9.5 which requires HCVs etc - but currently not explicitly RTE species - to be 'protected and/or enhanced'. Status should not just be monitored there, but improved, in line with 7.9.5. Should look more at how well 'protected or enhanced' currently audited and how guidance and support on this can be strengthened, e.g. to include consideration of active measures to increase habitat connectivity, reduce likelihood of human-wildlife conflict in broader landscape, and increase core patch size in line with recommendations from Sensor project: e.g. this paper https://besjournals.onlinelibrary.wiley.com/doi/pdf/10.1111/1365-2664.13472 - ""we recommend active management by plantation companies to improve forest quality of degraded HCVAs (e.g. by enrichment planting). Future revisions to the RSPO's Principles and Criteria should also ensure that large (i.e. with a core area >2 km ²) HCVAs are reconnected to continuous tracts of forest to maximize their connectivity benefits"""
447	7.9.7	Please define what an RSPO approved HCV assessor is? This term was initially made to refer to a list provided by RSPO – but this list has been removed. As non-ALS HCV assessments are allowed, it is unclear which HCV assessors fall under this category. It is best to remove this term.
448	7.9.7	7.9.7. What is meant by appropriate disciplinary measures?
449	7.9.8	"Recommendation for Indicator 7.9.8: Consider adding a definition of “natural ecosystems”. A suggested definition is the Accountability Frameworks’ definition of natural ecosystem (see Definitions Accountability Framework initiative - Accountability Framework (accountability-framework.org)) Rationale: Regarding the definition of “natural ecosystem”: to align with the existing responsible supply chain framework so that we can enhance the use of common language on the effectiveness of the grievance system. "
450	7.9.8	Efforts to avoid/mitigate human-wildlife conflict are important as part of both conservation efforts and measures to protect communities and workers - we'd suggest consideration of how this might be included more explicitly in P+C. This is already in guidance and is linked with HCV protection so it would not be adding additional requirements necessarily - more about making expectations re protection of people and species more explicit. Indicators would need to be carefully considered to ensure focus is on effective and appropriate monitoring and management measures being put in place. If this is considered sufficiently covered by existing indicators then this should be clarified, and guidance made more detailed re how to audit this.
451	7.9.8	Added sentence: changes to the NKT/SKT area or other conservation areas are outlined in the Management and Monitoring Report

#	Indicator	Comment (English)
452	7.9.8	"Added the phrase ""change or NKT/SKT area update (if any) is poured in Management and Monitoring Report "" Reasons Why HCV Information May Change Over Time: 1. Natural Environmental Processes 2. Social & Political Process 3. Updated/improved techniques and data 4. Deliberate Damage and Destruction to HCVS "
453	7.9.8	"Proposed Indicator 7.9.8: The phrase ""Amendment or Updating the NKT/SKT area (if any) is set out in the Management and Monitoring Report"" "
454	7.9.8	Proposed 7.9.8 Improvement of Indicators added Sentence: Changes to the NKT/SKT area or other conservation areas are outlined in the NKT/SKT management and monitoring report
455	7.9.8	Proposed 7.9.8 Improvement of Indicators added Sentence: Changes to the NKT/SKT area or other conservation areas are outlined in the NKT/SKT management and monitoring report
456	7.9.8	"Proposed indicator 7.9.8: added the phrase ""change or NKT/SKT area update (if any) is poured in Management and Monitoring Report "" "
457	7.9.8	"7.9.8: added the phrase ""Change or Update NKT/SKT area (if any) is set out in the Management and Monitoring Report"" Reasons Why HCV Information May Change Over Time: 1. Natural Environmental Processes 2. Social & Political Process 3. Updated/improved techniques and data 4. Deliberate Damage and Destruction to HCVS"
458	7.9.8	[Abidjan WS] 7.9.8 outcome of monitoring should be incorporated into the management plan on annual/ five years basis - there is a need to specify the timeline for the update of management pan based on monitoring result.