

#	Indicator	Comment (English)
1	Definition	The definition of small system or associate producer does not fit the small associated producers that exist today in Latam. These small producers want to maintain a direct relationship with the extractor plant and certify under the umbrella of the certification unit, but this producer is autonomous and has total management, management, exploitation, financing of their land or property.
2	Introduction	The ISH standard has not much changed from the 2019 version. We do not see a difference on the definitions of (i) smallholder (ii) independent smallholder (iii) scheme smallholder. This is a big discussion in Latin America as in most of the cases smallholders are independent smallholders and there is a confusion to define if the smallholder is either a scheme or an independent smallholder. Furthermore, there are social enterprises (see Honduras NI definitions). It's important to have more discussion about how to read the smallholders in different regions. Examples: Guatemala, Honduras, PNG > Suggest RSPO to follow up closely with the NI to indicate what would be appropriate in each case, to review all the scenarios.
3	Principle 1	1.1 There are two (2) core business vehicles which are legal entities and business entities (are we covering business entities as well?). To establish legal entities requires the approval of some government authorities, on the other hands to establish a business entity requires registration with government authorities.
4	Principle 1	Do we need to add four (4) GAP pillars for clarity ? As can be referred in FAO (https://www.fao.org/3/y8704e/y8704e.htm) pillar one: economic viability, pillar two : environmental stability, pillar three: social acceptability, and pillar four: food safety and quality
5	Principle 1	The legal figure limits the independence of the producer, another strategy could be sought that allows the union of several producers to achieve their certification without implying creating a legal figure, example a commitment of union as a group and compliance with the standard as proposed in the annex 2 of the norm.
6	Principle 1	1.1e specify or direct the indicator so that the small producer can be certified alone, without being associated or with a benefit plant.
7	Principle 1	The legal entity of the certification group implies tax costs (tax payment, accountant, legal advice, etc.), which sometimes hinders the process of grouping members.
8	Principle 1	[Abidjan WS] 1.3 - provide a list of GAP and BMP. How many BMP in a year?
9	Principle 2	This is not fair for smallholder with Land Application status (LA). It's because, some of smallholder applied the land since around 70-an and still pending getting the Approval or Grant from state government (NT). As a group manager for smallholder group, we are advice, who is smallholder with LA's status, RSPO/auditor take the consideration at least, the smallholders; 1. Can proof there is no land dispute, 2. Can proof the smallholder not doing any encroachment for any sensitive area, i.e., forest reserve, waterbody, any HCV area, etc., (proof during stakeholder consultation with nearby stakeholder or any related to the Government agency), 3. The smallholder have proper boundaries

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10	Principle 2	>Welcome the addition – aligned with PC2023: Principle 2 : Smallholders provide the coordinates or maps of their plots and evidence of ownership, or rights to use the land or demonstrate that they are in the process of legalisation of that right (2.1 E); Smallholders declare any existing disputes on the land, commit to resolving said disputes, develop a plan to address them, including initiating a participatory mapping with relevant stakeholders as may be required, and provide information on the current status of those disputes (2.3 E); Smallholder plots are located outside areas prohibited by national park or protected area, as well as steep terrain (2.4),
11	Principle 2	It makes no sense to demand a CLPI for established plantations: it would no longer be prior. In addition, even for the PPI there is no clarity about the simplified CLPI
12	Principle 2	It is important to clarify that in Latam there are PPI that were before some places such as protected natural areas (ANP) were declared ... They cannot be certified? Likewise, in many of our countries the ANP have a management plan, where a core zone (100% conservation) and other areas, for example, of damping, where non -extensive agricultural crops can be established, which apply for PPI. Then, in this indicator there should be a procedure note that indicates that the ANP management plan must be reviewed to verify whether or not to establish the crop.
13	Principle 2	2.2 Define if it is for new plantations or for existing plantations, even if for existing plantations in production request consent is to return to the past
14	Principle 2	2.2. Clip, will apply only for new plantations. And when the simplified approach procedure will be established.
15	Principle 2	[Abidjan WS] 2.1EA replaced 'can' with 'shall'
16	Principle 2	[Abidjan WS] 2.2E replaced 'can' with 'shall'
17	Principle 3	[Accra WS] 3.1 MS A 'No evidence of force-labour should be in MSA' MS A: Shall include both i) no evidence of force- labour and ii) completion of training. MS B are the same as MS A

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18	Principle 3	<p>>Welcome the addition – aligned with PC2023:</p> <p>Principle 3: Smallholders agree not to use forced labor and ensure that any use of forced labor on the farm ends at the Eligibility stage. At a minimum, a simplified labor agreement (i.e., a labor register) stipulates workers' basic employment terms, in accordance with national context and regulation (3.1 E); There is no evidence of forced labor. Smallholders implement measures to ensure that all work is voluntary, and the following practices are prohibited: • Retention of identity documents, including but not limited to passports; • Payment of recruitment fees by workers; • Contract substitution; • Involuntary overtime; • Lack of freedom of workers to resign; • Penalty for termination of employment; • Debt bondage; • Withholding of wages (3.1 MS B); Are there workers on the farm?... . The term workers includes permanent and non-permanent workers, and based on the regional customary for temporary workers (3.3); Smallholders commit to providing safe working conditions and facilities including appropriate Personal Protective Equipment (PPE) free of charge (3.5 E)</p>
19	Principle 3	<p>[Accra WS] 3.1 E should break into three separate indicators - else one non compliance will need to the entire indicator NC: i) Agreement not to use force labour; ii) Simplified agreement shall be signed for an labour engagement longer than 3 months, stipulates.... regulation.; iii) source of labour. MSA and MSB are the same across all three.</p>
20	Principle 3	<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>
21	Principle 3	<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>
22	Principle 3	<p>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.</p>

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23	Principle 3	<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>
24	Principle 3	3.1 has defined the scope of contract substitution
25	Principle 3	3.3 Leave what national legislation indicates and not opt for customs of the region
26	Principle 3	In most indicators, the commitment is first and then the training in the relevant issues ... I understand that it was left to facilitate compliance; But, at least it should be clarified that to establish the commitment, the group manager must inform and explain what each term is being ensured that the PPI understands it.
27	Principle 3	3.6 E Define that it is discrimination, harass or commit abuse, or leave it as the national legislation of the country indicates, or first place the 3.6 ha and train it prior and then compromise
28	Principle 4	<p>>Welcome the addition – aligned with PC2023:</p> <p>Principle 4: Do any smallholders within the group have plans for new planting of oil palm? New planting of independent smallholders, since November 2019:..</p> <ul style="list-style-type: none"> • Are not located in restricted areas or protected by national laws • Are not on riparian areas (4.3); Do any smallholders within the group have plans for replanting plots that are located on peat? If no, SKIP. Plots on peat are replanted only on areas with low risk of flooding or saline intrusion as demonstrated by an RSPO approved flood risk assessment, in accordance with the RSPO ISH Flood Risk Assessment Template(4.5); Riparian buffer zones are identified and managed to ensure maintenance and/or improvement, in accordance with national legislation and taking into account the RSPO Manual for the latest version of the Management and Rehabilitation of Riparian Reserves - Simplified Guide (4.7)
29	Principle 4	Please look into the RSPO P&C gap analysis vs. the EU Deforestation Regulation. The conclusion in that analysis should be checked for the RISS as well: "The above means that there is a misalignment between the 'deforestation-free' requirement of the EUDR and the RSPO Principles & Criteria approach using HCV and HCS assessments, including relevant definitions." At the same time, the risk of introducing this requirement is: making RISS more difficult to comply with while many smallholders do not deliver into the EU market.
30	Principle 4	<p>HCSA strongly advocates that the Simplified HCS-HCV Approach for Indonesian Palm Oil smallholders to be used as the basis for the RSPO HCS-HCV procedure.</p> <p>Any forthcoming develop or trials of a simplified or adapted approach for smallholders, the HCSA Simplified HCS-HCV Approach should be used as the starting point.</p>
31	Principle 4	If the smallholder refer and follow to the actual RSPO riparian management guideline, size/wide of riparian will be effect to the size of cultivation oil palm and it's will be reduce income of FFB harvesting.

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32	Principle 4	<p>>Welcome the addition – aligned with PC2023:</p> <p>A- ICS group entity and group management requirements: participation of members and/or consultation in planning to implement the group's ICS system (A2.1E)</p> <p>B-ICS: policies and management: The ICS is implemented and an annual internal audit of the group is conducted on at least half of the group members (for IC), followed by the balance half in the following year (ASA1). In the next following year until recertification, sampling size for group annual internal audit will be based on risk assessment to all existing members, which include members that fall under Medium and High risk, and new members (if any). The total sampling size for annual internal audit shall not be less than 33% of group size (B 1.1 MS B)</p> <p>Annex 2 Smallholder declaration: C. I will provide the following information to my group manager 6. Any plots located on riparian (NEW)</p>
33	Principle 4	Clarify that alternative livelihoods and saline intrusion are, these terms are not understood
34	Principle 4	<p>Clarify that remediation and/or compensation should be done as the case may be and this will be done in the area resulting from the LUCA analysis, the above since compensation is not included and a maximum area to be remedied is indicated, which implies that A minimum area could be chosen.</p> <p>On the other hand, the indicator establishes a plan to identify the area to be remedied, which is not true since a simplified luca was carried out in the mile also simplified remediation and compensation that today does not exist</p>
35	Principle 4	Clarify what type of training should be completed or referred to simply to training
36	Principle 4	This principle contemplates the identification of natural ecosystems, AVC, identification of riparian areas, ARC forests, rap species, peat areas, ect. Taking into account that these identifications are carried out through specialized evaluations and studies, the standard must contemplate simplified studies and supported by the RSPO so that the PPI meets these requirements according to their resources and capacities.
37	Principle 4	The compensation does not apply to the PPI, only remediation.
38	Principle 4	4.2 Correct the indicator according to the version they will take in Luca's consultation that is not compensation
39	Principle 4	Adjusting the text since what should be minimized is the use of pesticides but not pesticides and herbicides
40	Principle 4	Include phytosanitary management within exceptional circumstances since the term covers both pests and diseases
41	Principle 4	Change the term pesticides by pesticides
42	Principle 4	4.8 E Change pesticides for pesticides such as the English version
43	Principle 4	4.6 Include that fire can be used in circumstances for pests and diseases.

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44		<p>This is an issue that has been discussed in different forums and has not echoed.</p> <p>It is necessary that the small independent producer be included (because it makes the decisions about their property) that it does not want to form a group or certify independently but prefers to certify under the certification of the extractor plant, to which its fruit gives.</p> <p>Like the "PPI", the "PPI-Associated" has lower resources and should be audited under the PPI indicators and not under those of full PyC, as applied today.</p>
45	A1-ICS	A1.4 meet the members of membership according to the language of the country that is carrying out the process more for a small producer who has to translate it, see the times of attention.
46	A2-ICS	I consider relevant to create a guide from the RSPO on the internal control system model to facilitate the group manager.
47	A2-ICS	From RSPO, training is promoted through coaches coach prioritizing the participation of group producers or managers in these training spaces.
48	A2-ICS	It is necessary that a guide be indicated on the relevant aspects of the Internal Control System (SIC), for example: what does governance include?; What includes the training plan? What does the audit plan include? How can a managing team be formed?
49	Annex 2	[Abidjan WS] C1 - please provide details on what are 'details information' on land holdings?
50	Annex 2	[Abidjan WS] C 10 - provide definition of land ownership - stating based on NI guidance.
51	C-ICS	Add C2.1.e: Approach to strengthen the chain in the supply chain, including the potential partnership with the Certification Unit (Mill) in the supply of certified material.
52	C-ICS	<p>To meet the EUDR regulation, I suggested to include additional bullets in this section. To ensure there is an urge to traceability at the level of self -help farmers.</p> <p>C1.1. E:</p> <p>Annual group business plans are available and include:</p> <ul style="list-style-type: none"> - Estimated production and income based on historical records; - Expansion plan, and - Collaboration and production partnership plans with certified mill or RSPO members
53	C-ICS	<p>C2.1.E</p> <p>To add in bullet 2: Approach to strengthen the chain in the supply chain, including the potential partnership with UC in the supply of certified materials</p>
54	C1-ICS	A transition period must be generated to achieve the group's financial stability, since they are new issues for them, achieving financial balance requires time to make decisions and evaluation of variables.