

# Public Consultation On RSPO Remediation & Compensation Procedures Summary

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Summary Report prepared  
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## Questions and suggestions

### Smallholders

1. Clarification and guidance for RaCP for schemed and independent/outgrower smallholders.
2. Who is liable for non-compliant land clearance conducted by smallholders?
3. Disagree with HCV procedure for smallholders. In terms of RaCP, olding companies liable for this needs reconsideration, ie different coefficient should be developed for smallholder-managed farms.

### Land use change analysis (LUCA)

1. LUCA using satellite imaging is restrictive and expensive. Site reference using vegetation nearby should be considered as another option.
2. Natural grassland in Africa needs a coefficient (more than 0) because it has its own biodiversity.
3. Land cleared due to natural disaster should also be considered in the compensation procedures.
4. Farmers/companies converting monoculture plantation should not be required to undertake LUCA if they can prove that the previous land use was monoculture or grassland, because LUCA is expensive.
5. Guidance on how the coefficients were derived.
6. Tools for LUC analysis.

### Monitoring of remediation and compensation plan/project

1. More information on monitoring the compensation procedure/plan.
2. Who does the monitoring of the compensation plan? Suggest the CB doing the certification audit include the monitoring in the audit scope.



## Questions and suggestions

### Others

1. More information related to the decision-making processes of the RSPO compensation panel.
2. Clarification of option 2 (USD/ha): Is the monetary value of USD 2,500 fixed or subjected to review?.
3. More guidance on remediation management plan.
4. Liability should stay with the party which caused the compensation. If a company did not disclosed their liability during acquisition deal, liability should be maintained within the company.
5. Definition of compensation and remediation.
6. What is the role of the government (2) in RaCP? Government should be involved in the entire process to avoid problems in implementation.
7. What is the role of manufacturers in the supply chain in RaCP?
8. There should be African (industry) representation from the inception/development of the procedure. African countries should not be included in the “rest of the world” category.



# Individual questions

## **LUC and coefficient**

- How did you come up with the coefficient figures?
- How does the LUC analysis covers the lost of animal species during compensation?
- Do we use REDD+ or REDD++ methodology to estimate land use change?

## **Monitoring**

- Who monitor the compensation plan? (2)
- What is the process for monitoring the remediation procedure?
- What should be the best tool or entity to do the monitoring of the plan implementation?

## **Procedures making process**

- How is Africa going to provide input to the whole procedure?
- Will the RaCP document be subjected to review? What time interval?
- How are regional/local values and traditions brought in to bear on the procedure for the stakeholders?

## **Others (continued in next page)**

- When will the process start in all producing countries?
- How should operating companies proceed: slow and cautious, fast, or stop while some of the steps are under consideration?
- How does the RSPO RaCP apply to: parent companies with RSPO interest; smallholder schemes; independent outgrowers that are linked up with parent companies (e.g. sale of palm fruits by outgrowers to the parent company)?
- What is the decision-making procedure for the compensation panel?
- Does the rehabilitation of old inactive oil palm plantations (before 2005) by RSPO member require RaCP?
- What guidance exist for the remediation procedures and plan?
- How can an isolated land be linked to a national park? Would any wildlife be preserved in long term?



# Individual questions

## Others (continued)

- Which takes precedence: RSPO or Government on compensation procedures, given that some countries are lax or not even having clear procedures like this?
- How can government representation be implemented effectively?

## RSPO in general

- Is RSPO meant only for plantations and mills? Where is RSPO model for manufacturers?
- What motivation is there for manufacturers to be RSPO certified?
- Do you plan to open an office in Africa?
- A non RSPO member now (2015): Can the company develop a new land without NPP? When the company decide to join RSPO in 2016, what happens to the company in relation to NPP?



# Individual Ideas

## Smallholders

- NIs should be allowed to define what is an independent smallholder or outgrower (2).
- Different coefficient/calculation of compensation for smallholders and outgrowers (2).
- Clarification and guidance needed for smallholder farmers/outgrowers/independent smallholders in the African context (on average land 4 ha). A rogue smallholder farmer cannot jeopardise RSPO certification.
- Develop simple guidelines for outgrowers and independent smallholders.

## Improving overall document

- Convert the procedures into a flowchart for quicker assimilation.
- There must be an appendix section where success stories/strategies of RSPO compliant companies are highlighted to give greater insights.
- The presentation should be more detailed and should come with examples.
- Make the process less complicated.

## Monitoring

- Monitoring of remediation projects should be done by the RSPO member if it can prove in-house capacity or by a competent conservation organisation. How monitoring is to be done should be detailed in the application, including monitoring targets. Verification, however, should be done by the CB as part of the process.
- Monitoring of implementation should be done by the company, which will be easier.
- More guidance and clarity on the compensation monitoring plan.

## Coefficient and LUCA

- Give references for LUC.
- Satellite images should be well-made to get correct results from the field.



# Individual Ideas

## **Africa representation and government involvement**

- More African involvement and elected Africa representatives on RSPO working groups are needed at the drafting stage. (2)
- OLAM being the African industry representative in the RSPO compensation procedure should be reconsidered.
- More industry players from the different regions should be represented on the compensation panel.
- Government involvement in the entire process is needed.
- To make the whole RSPO P&C and the RaCP more effective/enforceable, governments, civil societies, NGOs, companies, smallholders, independent outgrowers to be brought on board with clear cut roles and responsibilities.

## **Others:**

- Old inactive plantations previously developed by government should not have to do compensation.
- Compensate based on carbon value, not on hectarage.
- More attention should be given to the remediation procedures. There is limited mention of the process in the presentation.
- Involve smallholders and the industry in the process.
- The company should be paying less because the remedial action they conduct would improve the HCV.
- Well-stated guidance on sanctions on non-compliance of the procedure/process.
- Non-member of RSPO should not only compensate for clearing after 2005 planting, but should also be given certification barrier, e.g. if members can get certified in one year, non-members can only be certified in 2 years, to prevent them from clearing.
- Based on the supply chain model adopted by manufacturers, there should be a coefficient/compensation or remediation transfer from suppliers of FFB, CPO, olein, etc.



# Individual Ideas

## **RSPO in general**

- Please add manufacturing to the RSPO model or make it clear and simple the position of manufacturing in the whole RSPO model.
- RSPO should get involved closely on the development of individual national interpretation on NPP/compensation.
- RSPO should have a regional African office in Accra (2).
- There should be a local auditing body for certification for each member country since there are differences in the laws of countries.
- RSPO should develop a special brand for each continent (Africa, Latin America, and Asia) to be closer to our realities.

