

#	Indicator	Comment (English)
1	Scope	<p>Rainforest Action Network has submitted various recommendations regarding Independent Smallholders in the P & C Review submission document Can the RSPO secretariat please review all those comments and consider them part of RAN's input on this standard please? The RSPO Independent Smallholder standard must be improved so it is clear that all FFB must be from legal suppliers and legal areas of production. As shown in RAN's latest Carbon Bomb report suppliers are able to provide certifications of their legal land certifications for some areas of production but are providing FFB from areas of illegal plantings within a protected area - The Rawa Singkil Wildlife Reserve in the Leuser Ecosystem. See ran.org/carbonbomb A gradual approach to traceable and deforestation-free sources from Independent smallholders is not acceptable and will result in the RSPO losing its relevance in the global market. Achieving traceability to the farm is possible for all suppliers, RSPO members just need to increase their investments in the establishment of traceability systems—and effective means of verifying traceability data. RAN's carbon bomb report clearly shows that the RSPO Mass Balance system is providing illegally produced palm oil to global markets and is enabling land speculators that are categories as 'independent smallholders' to sell palm oil grown illegally on deforested lands to RSPO members. Grievance mechanisms for smallholders should be able to ensure the identification of grievances between smallholder farmers and customary rightsholders. The allowance of smallholders to have up to 50ha opens up this loophole for use by land speculators that establish smallholder farms/plantation on customary lands without consent from customary rightsholders. This is another reason why the 50ha threshold is highly problematic. RSPO members must ensure all Independent smallholder FFB suppliers adhere to 7.11/no deforestation requirements and undertake spatial mapping to determine if planted areas of FFB suppliers have been cleared since Nov 2018. Supply shed wide/landscape approaches can be used to ensure full compliance by legitimate smallholders using the HCSA simplified approach.</p>
2	Scope	<p>The 50ha threshold should be reduced. This definitions should clearly say that the area that is considered a family farm can be defined much lower in national standards. The IS standard should refer to 10ha as being the limit in the Indonesian context. This is the area threshold set by the Indonesian smallholder support organization SPKS and has been accepted and used in the High Carbon Stock Approach. HCSA's language is: Independent smallholder: Farmers who own land or have long term lease or sharecropping arrangements to a certain maximum farm holding size*, live in villages, use the farm as their main income, are free to manage their land and its production, and the farm is based primarily on their own family labour and capital. This is compared to scheme smallholders, who are structurally bound by contract, by a credit agreement or by planning to supply a particular mill or processing facility and do not qualify as independent smallholders. * For Indonesia: 10 hectares. HCSA will develop maximum farm holding sizes for independent smallholders in all commodity supply chains and other geographies that the Simplified HCS-HCV Approach for Smallholders is being applied. Certification Standard National Interpretations for independent smallholders where they exist for a specific commodity, or where commodity NIs do not exist, common global definitions for independent smallholders, may be applicable if they are considered by the HCSA to be applicable. link This definition should be replaced with the High Carbon Stock Approach's full definition. You can see HCSA's official definitions in its membership requirements document: link</p>

3	Scope	<p>RPOG members remain supportive of the ISH Standard and support activity by the RSPO to make it easier to implement and understand by independent smallholders (ISH). Our substantive comments on the draft text have already been included via our member, Tesco, during Taskforce meetings. We would however also like to include a reflection that notwithstanding how perfect the Standard is, it is only one small part of the equation to support ISH. This support will likely become even more essential in the more highly regulated framework EU companies will operate in from 2024 onwards. Alongside the update to this Standard we would also like to see the RSPO: - Provide greater support to ISH on training, accessing funds and signposting of support to help them gain certification - More work is needed to ensure that they are incentivised sufficiently to start the certification process - With this in mind, there needs to be more effort on the creation of a route to market for physical supply that is in line with new EU regulatory requirements, whilst continuing to support ISH Credits</p>
4	Scope	<p>Is this broadly conceived to also include communal ownership of palm production areas?</p>

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1	1.1	Planters form independent entities --> smallholders form independent entities in accordance with the law (for example: associations, cooperatives, groups, associations, etc) and are not/are not part of the Oil Palm Plantations.
2	1.1	on PnC 1.1 Planters form a legally independent entity from the PKS company, can the PKS company provide Legality legally
3	1.1	"... and the group will represent the organizational capacity to comply with RSPO standards" --> the capacity of farmer organizations/groups related to understanding the RSPO has become a mandatory part of Eligible. (at point 4). so there is no need for repetition.
4	1.1	audit costs should not be a burden to smallholders. A different entity than the smallholder group should cover these audit costs.
5	1.1	Do not agreed with the new added texts, as it runs the risks of excluding mill's supporting as a GM.
6	1.1 E	How are "fair and transparent decision making and governance practices being monitored?"
7	1.1 MS A	Training goes first and should be placed first. Training needs to be effective, meaning it is based on Farmer Field School, model farm or lead farmer approaches in the field to increase the probability that smallholders eventually will transform their production practices.
8	1.1 MS A	1.1 MSA - ... and made understood the Fresh Fruit Bunch (FFB) pricing mechanisms, financial management, and best practices for smallholder organisations. As ISH is mainly dealing with FFB and not palm oil
9	1.2 E	The training program shall be developed jointly with the smallholder membership in a participatory way to respond to their challenges and needs. Income diversification and use of resources to facilitate the adoption of practices that improve the livelihoods need special attention.
10	1.2 E	1.2 E - add - Group Training program plan shall cover (at minimum,) documenting and recording of production and operational practices, including inputs, yields, and transactions for all FFB sales
11	1.2 E	"Program Training Plan" Question: how will CB verify program plans that have not been implemented? how to ensure that this plan will be implemented in the future? Can you explain the meaning or verification for the program plan here, what is it like?
12	1.2 MS A	Record keeping is one of the biggest challenges for smallholders. Practical guidance, booklets or Apps need to be provided to increase the likelihood that record keeping will be the new reality for smallholder. The concept of Living Income (see Living Income Community of Practice) needs to be added as a clear framework that covers all basic needs for smallholders.
13	1.2 MS A	Given the growing demand for traceability to plantations/farms, training could also include - how to use relevant technology based traceability tools to record transactions, maps, GPS, agri practices and other farm related information.
14	1.2 MS A	1.2 MSA - remove 'use of labour' - as this is too specific and not applicable to ISH plots without labour. Need to specify what are the farm operation transaction training as minimal requirement? Suggest to replace 'farm operation transaction' to 'complete production and selling of FFB'.
15	1.2 MS B	What does "managing their farms effectively" mean? Any reference to other criteria or guidance or? Is it referring to productivity? Profitability? Regenerative agriculture?
16	1.3	1.3 clear requirements on 'minimum topics recommended by RSPO' must be made readily available during the adoption of this revised standard
17	1.3	Translation from English to Indonesian is not sufficient, it needs to be considered and clarified again. what it might mean - Growers adopt best management practices (PPT) in their plantations by tracking/controlling their productivity, and are not subject to FFB sales records.
18	1.3 E	1.3 E: the term farms is not adequate, better to use "in their management units"
19	1.3 E	Best management practices (BMP) need to be specifically defined to achieve expected impacts and avoid confusion between smallholders, auditors and certification bodies.

20	1.3 MS A	Guidance for GAP should be published around the same time as the finalisation of this standard to avoid implementation delays.
21	1.3 MS A	Training methods need to be effective. By this means, pre- and post training activity surveys shall be conducted to measure results and change.
22	1.3 MS A	1.3 E, MSA - be clear on what is GAP and what is BMP - the differences
23	1.3 MS B	This indicator can be merged with the previous one.

#	Indicator	Comment (English)
1	2.1	in Indonesia, spatial regulations are often found in various versions (by year), and there are spatial plans that have not been legalized (not yet legitimate). based on this case, it is necessary to emphasize that these principles/criteria/indicators refer to the latest regulations, and spatial plans that have been approved. however, if the latest regulation conflicts with the spatial layout plan that has been passed, then this needs to be resolved as a reference for land management.
2	2.2 E	This indicator should also define for scenario where FPIC is not applicable (i.e., adat land) - where there is no indigenous peoples, local communities or other users. To ensure auditor is not requesting for FPIC documentation on adat land.
3	2.3	Indicators 2.1, 2.2, and 2.3 could be packaged since they are all about legitimate land use rights.
4	2.3 E	2.3E provide clear guidance on 'develop a plan' - what content checking will be required - specific to look at the resolution resolving any disputes identified.
5	2.3 E	How can the CB verify the conflict resolution plan. What is the documentation system that has been carried out by independent smallholders? What is meant by a settlement plan, what is it like here? Then how does CB carry out field verification and validation, while social issues and conflicts are always dynamic.
6	2.3 MS A	within the groups of indigenous people and local communities, there is a very important portion of the population that should receive special attention: women.
7	2.4	Need to include clearly defined by adding: national, regional or regional law, or as specified in National Interpretation. Because talking about regional spatial planning must be determined at the regional level.
8	2.4	There are protected areas of mixed character that allow for the sustainable use of land, e.g., by smallholders. The impact comes more with the management than the location.
9	2.4 E	Question: what about the condition of the smallholders' gardens which overlap with the HGU permit? there needs to be an indicator or an explanation of this.
10	2.4 E	There are protected areas of mixed character that allow for the sustainable use of land, e.g., by smallholders. The impact comes more with the management than the location.
11	2.5 E	"For example, Central Government, commercial owners" The government has the authority to only issue permits, what kind of government position is meant here? Commercial owners are replaced by other land owners (including private parties)
12	2.5 E	2.5 E to ensure alignment with 2.5 MSB, include vulnerable group into the indicator.
13	2.5 E	Commit not to clear does not actually imply that the land won't be cleared after. So, a more impactful wording will be: Smallholders DO NOT clear or acquire land...

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1	3.1 E	[Abidjan, 14 Dec 2022] 3.1E define what is simplified work agreement, what are the minimal required information and perhaps to include the date of the registration.
2	3.1 E	"... by formalizing simplified work agreements (e.g. work lists) setting out the basic terms of employment" Understanding from CB required for verify is related to "simplified"
3	3.1 MS A	FONAP task force: see all relevant previous comments on the respective P&C indicators
4	3.2	FONAP task force: ..., under adult supervision, if childrens' health and physical/psychological development is not put into risk, and when not interfering...
5	3.2	Based on the case in Indonesia, many family farms still employ children (<18) and family members for the purpose of reducing costs (operational costs). It is necessary to add to the scope of point (5), that children who work in the garden are not forced and under pressure from their parents/adults.
6	3.2 E	Jakarta Consultation W/S, 6 Dec 2022] 3.2E please definition of 'family farms' and clear threshold of children (proposed the cut-off age at 15).
7	3.2 E	[Jakarta Consultation W/S, 6 Dec 2022] Provide clear definition of family farms and age cut of for children (proposed at 15).
8	3.2 E	FONAP task force: see all relevant previous comments on the respective P&C indicators
9	3.2 MS A	FONAP task force task force: see all relevant previous comments on the respective P&C indicators
10	3.3	FONAP task force: ..., under adult supervision, if childrens' health and physical/psychological development is not put into risk, and when not interfering...
11	3.3 MS A	FONAP task force: see all relevant previous comments on the respective P&C indicators
12	3.3 MS B	FONAP task force: see all relevant previous comments on the respective P&C indicators
13	3.4 MS A	FONAP task force: the communication between smallholders and temporary workers is mainly verbal. So, let's be practical and embrace the reality, please.
14	3.4 MS B	FONAP task force: the communication between smallholders and temporary workers is mainly verbal. So, let's be practical and embrace the reality, please.
15	3.5	FONAP task force: What is the guidance for "safe"?
16	3.5 E	FONAP task force: see all relevant previous comments on the respective P&C indicators
17	3.5 MS A	FONAP task force: see all relevant previous comments on the respective P&C indicators. This type of training only works if practical (Farmer Field Schools, lead farmers, extensionist visit on farms or similar)
18	3.5 MS B	"FONAP task force: adequate drinking water needs to be defined. See WHO parameters in the following table. Or assure that water is treated (boiled, filtered, or chlorinated) "
19	3.5 MS B	[Abidjan, 14 Dec 2022] 3.5MSB define what is safe and adequate housing and types of workers that can request housing?
20	3.5 MS B	[Jakarta Consultation W/S, 6 Dec 2022] 3.5MSB 'access to toilet' to be removed - often for ISH - their farm is near to their house. Workers can use the toilet at the ISH house
21	3.5 MS B	Toilets in the certification unit of smallholders will be very simple, i.e. latrines.
22	3.6	FONAP task force: see all relevant previous comments on the respective P&C indicators

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23	3.6	How will these issues to reported (systems, documents, checks and balances) and to who?
24	3.6 E	FONAP task force: A commitment does not mean that these situations won't happen. Change wording to: Smallholders do not practice discrimination, harassment or abuse...
25	3.6 E	[Abidjan, 14 Dec 2022] 3.6E to include Smallholders.... harassment and/or abuse ...
26	3.6 MS A	FONAP task force: see all relevant previous comments on the respective P&C indicators
27	3.6 MS B	FONAP task force: this requires social research techniques. Additionally, it is not phrased as a requirement for smallholders, but rather as a certification condition.
28	3.6 MS B	[Jakarta Consultation W/S, 6 Dec 2022] The whole sentence will need to be reworded. No evidence found - if there is no discrimination - there is nothing to be evident. What it then mean no 'evidence' found? Suggested wordings - There shall be no evidence of discrimination, harassment, or abuse within the UoC.

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1	4.1	Why does this standard include a cut-off date of 2019, not 2018. We suggest this is changed so both standards use Nov 2018.
2	4.1	FONAP task force: This is only functional at the producer group level. And even at the producer group level, there are simpler classification methods for ecosystems.
3	4.1	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. 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. The HCSA will share the latest version of the Simplified Toolkit (expected to be completed in the next few weeks) with the RSPO secretariat.
4	4.1 E	"FONAP task force: Indonesian context - Farmers have low knowledge about care and protection of RTE species (fauna). - The care and protection of RTE species (fauna) must be handled by experts or government agencies in charge of protecting RTE species. - The group must have an SOP on temporary handling and reporting of RTE species (fauna) to government agencies in charge of protecting RTE species."
5	4.1 E	This language is not acceptable. RAN recommends it is replaced with. 4.1 High Conservation Value (HCV) areas and High Carbon Stock (HCS) forests after November 2019, in the smallholder plot or within managed areas, are identified through the simplified HCV-HCS Approach for Indonesian Palm Oil and managed to ensure they are maintained and/or enhanced. 4.1.E Smallholders commit to protect HCV areas and HCS forests through the application of the simplified HCV-HCS Approach for Indonesian Palm Oil. Equivalent simplified HCS-HCV approaches developed or endorsed by the HCSA may be used in jurisdictions other than Indonesia. The HCSA and the RSPO should collaborate on trials of the Simplified HCS-HCS Approach in member regions. The Simplified HCS-HCS Approach for Indonesian Palm Oil should be used as the starting point in trials.
6	4.1 MS A	"FONAP task force: Indonesian context - Workers only focus on certain types of work in temporary/short periods - Work agreements between smallholders and workers are only for short periods, so training obligations for workers are not efficient"
7	4.1 MS A	4.1 MSA Replace with Smallholders participate in trials of the simplified HCV-HCS Approach for Indonesian Palm Oil in all new developments Equivalent simplified HCS-HCV approaches developed or endorsed by the HCSA may be used in trials in jurisdictions other than Indonesia.
8	4.1 MS B	FONAP task force: participatory approaches should be embraced as much as possible, taking the smallholder communities' challenges and needs in mind.
9	4.1 MS B	4.1 MSB Replace with 'Smallholders manage plots or managed areas in accordance with integrated conservation and land use plans (ICLUP) developed using the simplified HCV-HCS Approach for Indonesian Palm Oil in all new developments.
10	4.2	FONAP task force: there needs to be relevant guidance so that these terms can be understood by smallholders and the methodology will be of practical, participatory and low-cost nature.
11	4.2	[Jakarta Consultation W/S, 6 Dec 2022] 4.2 Compensation in the form of 'monetary' is impossible for ISH. Any new procedure for remediation should have a clear procedure and timeline to avoid long delay.
12	4.2 E	"FONAP task force: see all relevant previous comments on the respective P&C indicators. This indicator is unrealistic for smallholder groups."
13	4.2 MS A	"FONAP task force: see all relevant previous comments on the respective P&C indicators. This indicator is unrealistic for smallholder groups."
14	4.3	"FONAP task force: there needs to be relevant guidance so that these terms can be understood by smallholders and the methodology will be of practical, participatory and low-cost nature. FONAP task force: DEFORESTATION and FOREST DEGRADATION need to be separately defined based on internationally accepted FAO definitions."

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15	4.3	Do not replace any HCVs, replace with 'Do not damage or destroy any HCVs'
16	4.3 E	"FONAP task force: smallholder tend to act in a practical way. Commitment is a more theoretic term for the smallholder scope. FONAP task force: DEFORESTATION and FOREST DEGRADATION need to be separately defined based on internationally accepted FAO definitions."
17	4.3 E	Critical to avoid loss of HCV/HCS forests between E and MS1 stage, is that farmers have a tangible (as opposed to theoretical) understanding on what the likely HCVs and HCS forests are in the planned conversion areas when they make this commitment. The risk with current wording is that a commitment is made on a poor understanding, and HCVs/HCS are lost as at eligibility stage farmer can still proceed to clear in absence of completing the HCV-HCS procedure. Proposed alternative wording 'commit to no new planting until the HCV-HCS procedure is completed'
18	4.3 MS B	"FONAP task force: see all relevant previous comments on the respective P&C indicators. This indicator is unrealistic for smallholder groups. FONAP task force: DEFORESTATION and FOREST DEGRADATION need to be separately defined based on internationally accepted FAO definitions."
19	4.3 MS B	current lacks any requirement on smallholders to implement the plan, and to use monitoring to inform updating the management plan
20	4.4	FONAP task force: what are these best management practices? Please, specify.
21	4.4 E	FONAP task force: this indicator is too vague and the respective BMPs need to be defined here.
22	4.5	FONAP task force: is this indicator realistic? How will this risk assessment for smallholders look like? Is it practical and of participatory nature?
23	4.5	Guidance documents etc should include what RSPO approved means.
24	4.5	RSPO "Flood Risk" should provide farmers with flood risk analysis templates. What about the cost consequences, who will bear the costs for these activities? Who will check the ground check?
25	4.5 E	FONAP task force: smallholder tend to act in a practical way. Commitment is a more theoretic term for the smallholder scope.
26	4.5 MS B	"FONAP task force: see all relevant previous comments on the respective P&C indicators. This indicator is unrealistic for smallholder groups."
27	4.6	FONAP task force: burning of waste is very common. What is the alternative treatment that RSPO proposes, in areas where municipal waste collection services are not available?
28	4.6	[Abidjan, 14Dec 2022] Fire used for preparing land (bush land, other agricultural and/or allowable forested areas) are to be allowed - as the cost for land preparing using mechanised method is costly for ISH.
29	4.6 E	FONAP task force: smallholder tend to act in a practical way. Commitment is a more theoretic term for the smallholder scope.
30	4.6 E	[Abidjan, 14 Dec 2022] 4.6E define the cut-off years for prior burning. How many years prior?
31	4.7	FONAP task force: see all relevant previous comments on the respective P&C indicators
32	4.7 MS B	Growers maintain, manage and protect in proportion to the riparian buffer zone area
33	4.8	FONAP task force: this is a very vague indicator. It does not entail a pesticide risk classification table, related risk management practices, and safe pest management practices (mixing, applying, storing, calibration of spraying equipment, deposit of empty containers)
34	4.8 E	FONAP task force: see all relevant previous comments on the respective P&C indicators. This indicator is irresponsible in the sense of exposing smallholders (with their knowledge and access to PPE) to unmanageable hazards of PPEs.
35	4.8 MS A	FONAP task force: see all relevant previous comments on the respective P&C indicators. This indicator is irresponsible in the sense of exposing smallholders (with their knowledge and access to PPE) to unmanageable hazards of PPEs.

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36	4.8 MS B	FONAP task force: see all relevant previous comments on the respective P&C indicators. This indicator is irresponsible in the sense of exposing smallholders (with their knowledge and access to PPE) to unmanageable hazards of PPEs.
37	4.9	FONAP task force: see all relevant previous comments on the respective P&C indicators
38	4.9 MS A	FONAP task force: this indicator is too vague and the respective BMPs need to be defined here.
39	4.9 MS B	FONAP task force: where are the specifications? Where is the guidance?

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1	A 1.2 E	[Jakarta Consultation W/S, 6 Dec 2022] A 1.2E what does it means 'evidence of the existence'?
2	A 1.3 E	FONAP task force: this indicator is vague. Which type of membership requirements? Compliance? Benefits? Obligations?
3	A 2.1 E	[Jakarta Consultation W/S, 6 Dec 2022] A 2.1 E Repetition of sentences. Suggest to revert back to ISH 2019 wordings below: The group manager has planned for the implementation of the ICS. It is understandable that the ICS plan is to be done in consultation with all members of the group.
4	A 2.1 E	FONAP task force: please, improve the wording of this indicator. It is confusing.
5	A 2.1 MS A	[Abidjan, 14 Dec 2022] A2.1MSA remove the word 'individual'.
6	A 2.2 E	FONAP task force: how is this measured? What is the KPI?
7	A 2.2 MS A	FONAP task force: how is this measured? What is the KPI?
8	A 2.3 MS B	FONAP task force: the importance is not on attendance, but rather on achieving transformation of practices. And measure with pre- and post-activity surveys the change.
9	B 1.1 MS A	FONAP task force: audit costs should not be a burden to smallholders. A different entity than the smallholder group should cover these audit costs.
10	B 1.1 MS B	FONAP task force: how do you define medium and high risk in this sense? Please, specify.
11	C1	Which stakeholders are involved in making the business plan and who monitors them?
12	C 1.1 MS B	New wording: The group has a financial analysis that is consistent with its business plan and that it has financial stability strategies.
13	C 1.1 MS B	[Abidjan, 14 Dec 2022] C1.1MSB , add by the end of the sentence - 'as and when it is applicable with justification.' [Jakarta Consultation W/S, 6 Dec 2022]
14	C 1.1 MS B	C1.1. MSB maintain the ISH 2019 wordings as below: The group demonstrates financial stability and growth and is able to support itself financially.
15	C2	[Jakarta Consultation W/S, 6 Dec 2022] This Criteria linked to B about the ICS
16	C 2.1 E	Add a plan for business continuity/ exigency (in case of natural disasters/ pandemics)
17	C 2.1 MS B	[Jakarta Consultation W/S, 6 Dec 2022] C2.1 MSB This should be the responsibility of the group manager.
18	D 1.1 MS B	Traceability starts from the supplier producer demonstrated with transparency?
19	D 1.1 MS B	Farmer groups ideally have a traceability system that complies with existing supply chains
20	D2	[Abidjan, 14 Dec 2022] Rewording the whole criteria into The group shall implement a system for documenting procurement and sales, including managing all transaction through the RSPO online platform (Palmtrace)