

#	Indicator	Comment (English)
1	General	<p>In 2018, the RSPO strengthened its certification standard to prohibit deforestation, new development on peatlands, and strengthen protections for the rights of communities and workers. These changes brought the RSPO into closer alignment with the global No Deforestation, No Peatland and No Exploitation (NDPE) benchmarks for responsible palm oil production. Rainforest Action Network recommends that the RSPO, and its members, ensures that the current review process does not weaken the standard— and therefore weaken the RSPO system as its standards with not meet the expectations of Civil society Organizations and emerging regulations that require no deforestation-free/ NDPE verified products.</p> <p>The RSPO can demonstrate leadership via ensuring the next endorsed P & C's remain aligned with NDPE benchmarks, as well as through making improvements in its complaints and assurance systems. Some complaints put to the RSPO have remained unresolved for years, while others have been dismissed without addressing key grievances raised in the complaint.</p> <p>The RSPO can also demonstrate leadership via ensuring improvements to the standard and traceability requirements as our recent Carbon Bombs report exposed RSPO members and RSPO MassBalance Supply Chains for continuing to source palm oil grown by a supplier that had established planting illegally within the Rawa Singkil Wildlife Reserve in the globally important Leuser Ecosystem. RAN's report (accessed via ran.org/carbonbomb) and the published field verification reports of its members Wilmar, GAR and Musim Mas should be reviewed by the RSPO so it understands the problems that persist in systems that rely on self-reported traceability and FFB supplier data.</p> <p>The RSPO still needs to demonstrate that its members are actually adhering to its 2018 standard. If the RSPO continues to fail to uphold its own principles and criteria, this will have huge ramifications on the credibility of the scheme going forward.</p> <p>Global market demands are shifting especially due to regulation in the E.U., the U.S., and specifically the state of California which are expected to require evidence that imported palm oil is traceable and free of deforestation. The RSPO needs to make fundamental shifts in 2023 if it wants to be seen as a trusted certification system for responsibly produced palm oil.</p>
2	General	The HCSA is submitting a request for collaboration to agree on how the best practices in the HCSA's Social Requirements can be integrated into the P & C, NPP process and other systems
3	General	Another overall comment for the document - the indicators for the medium growers and smallholders appear mostly identical to those for the mills throughout. So to make it clearer where there are actually changes, for the next version could the specific indicators where there is a difference between these three categories be highlighted in some way? Otherwise again, those reviewing will likely miss where changes in requirements are being suggested
4	General	As a general comment on this document and feedback process - it needs to be much more explicitly presented what has changed from the current 2018 P+C, otherwise the reader has to go through both this document and current P+C line-by-line to work out where changes have been made. We are concerned that because of this, a lot of changes will have been overlooked by those reviewing in the public consultation, including us. As a minimum in the next consultation draft, please flag criteria and indicators which have a change in interpretation vs the 2018 P+C, and each place where criteria/indicators have been added or removed altogether. Ideally though, we need to see every change to wording clearly presented, even if just by changing text colour. If possible, brief explanations alongside major changes would provide clearer context for why the change has been made, and so make responding to this in a useful way easier.
5	General	FONAP task force: the definition section is incomplete. BMP, ASA 1 and ASA 2, ERP, ERT, FFB, ICS, ISH, mill, plant refinery, deforestation, degradation, conversion, and UoC = Unit of Certification need to be defined, amongst other terms.

#	Indicator	Comment (English)
6	General	As a visionary statement, "legal, economically viable, environmentally appropriate and socially beneficial management and operations" are too softly phrased. Economically viable is the clear focus, and environment and people only come next. It is about safeguarding social structures and human/labor rights. And avoiding negative environmental impacts.
7	General	FONAP task force: As a visionary statement, "legal, economically viable, environmentally appropriate and socially beneficial management and operations" are too softly phrased. Economically viable is the clear focus, and environment and people only come next. It is about safeguarding social structures and human/labor rights. And avoiding negative environmental impacts.
8	General	needs editing after "respective indicator" as it does not read well. Suggested: "...respective indicator, and are shown in Bold and Underlined)
9	General	accepted
10	General	numbering
11	General	that is
12	General	Preamble
13	General	add "(SOP)"
14	General	effect
15	General	Suggest to change the word "stringent" because not all indicators are stringent
16	General	Notes? (plural)
17	General	should say 2018?
18	General	implementation
19	General	Contract substitution needs to refer to ALL contract types as defined under "contract".
20	General	Decent standard of living needs to be specified according to GLWC living wage national benchmarks, protocols, and methodologies: Remuneration received for a standard 48 hours workweek by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, housing, education, health care, water, transport, clothing, other essential needs including provision for emergencies and unexpected events (Global Living Wage Coalition, www.globallivingwage.org). In the case of smallholders, it is of utmost importance to refer to Living Income (see Living Income Community of Practice) as a clear technical framework.
21	General	suggest removing "such update/revision process"
22	General	Add ISH generic threshold

#	Indicator	Comment (English)
23	General	"Specific Indicators developed applicable..." needs editing Suggested "Specific Indicators are applicable..."
24	General	what about final definitions about smallholders? need to consider if Independent Smallholders with Partnership willing to use this P&C (with company support)
25	General	Incomplete sentence
26	General	what is covered in "siting"?
27	General	remove "is applicable"
28	General	suggest removing (NI) as introduced already in the title of this section.
29	General	be?
30	General	We need to add the rules as stipulated in the Group Certification System for FFB 2022
31	General	generic
32	General	For the sake of soil conservation, and avoidance of land slides 25 ha is an unsustainable threshold. 25 ha equals 500 m times 500 m. Consider to eliminate this threshold or adopt 0.25 ha instead of 25 ha.
33	General	The following is unclear: "The informative part is there to help with implementation of Indicators, but is not normative, nor can non-conformities be raised against this section." Suggested "The informative part is there to help with implementation of Indicators, but is not normative, hence non-conformities cannot be raised against this section."
34	General	Soil degradation also includes structural changes due to salinization or compaction.
35	General	Work by children is acceptable on family farms - runs against the child labor definition. Should state: light work or non-hazardous activities.
36	General	resulting?
37	General	resulting?
38	General	The following phrase seems to be missing the subject: "Accordingly, the UOC required to take corrective actions in the event of not being in compliance with the the Principles, Criteria and/or Indicators." Maybe it means: "Accordingly, the RSPO Member is required to take corrective actions in the event of its UOC not being in compliance with the the Principles, Criteria and/or Indicators."
39	General	beginning
40	General	The translation of this P&C document from the English version into Indonesian must be checked again because many are not in accordance with the original intent of the English version.

#	Indicator	Comment (English)
41	General	Removing a new indicator related to the provision of toilet facilities in the field because it has been covered in indicator 6.2.2 and due to the complicated handling of waste. Regarding the procurement of toilet facilities in the field, we propose to carry out further studies because it is not practical for current oil palm plantation operations in Indonesia
42	General	<p>I'm writing to urge the RSPO to require its members to commit to 'no deforestation, no peat, no exploitation' (NDPE) standards in the review of RSPO Principles & Criteria. These are standards adopted by the world's leading palm oil traders and end-users. The RSPO's proposed requirements are still lacking. I also urge the RSPO to prioritize improving its audit systems and enforcing NDPE standards.</p> <ul style="list-style-type: none"> - 'No deforestation' means limiting the clearance of secondary forest in high forest cover areas. - 'No peat' means addressing continued peatland degradation and requiring companies to 'retreat from peat'. - 'No Exploitation' means addressing insufficient human rights standards, including establishing living wages and protections for human rights defenders. <p>This is a critical moment for the RSPO. Many of its members have pledged NDPE palm oil supply chains by 2020, but if the RSPO does not act now to bring its own Principles & Criteria in line with NDPE standards, then it won't be able to hold its members with NDPE policies to account.</p>

#	Indicator	Comment (English)
1	Definition	The definition section should be complemented by the following: BMP, ASA 1 and ASA 2, ERP, ERT, FFB, ICS, ISH, mill, plant refinery, deforestation, degradation, conversion, and UoC = Unit of Certification need to be defined and should be listed consistently (with abbreviations) in the Terms and Definitions section, amongst other terms.
2	Definition	FONAP task force: the definition section is incomplete. BMP, ASA 1 and ASA 2, ERP, ERT, FFB, ICS, ISH, mill, plant refinery, deforestation, degradation, conversion, and UoC = Unit of Certification need to be defined and should be listed consistently (with abbreviations) in the Terms and Definitions section, amongst other terms.
3	Definition	Why not use true source? "Don't Pay for the Misdeeds of Others: Intro to Avoiding Third-Party FCPA Liability," 6 BNA White Collar Crime Report 33 (January 13, 2011) Archived March 16, 2014, at the Wayback Machine (discussing bribery in the context of the Foreign Corrupt Practices Act).
4	Definition	"Main "more than light work" of risk for 12-to 14-year olds should be defined for the oil palm production chain. Work harmful to children: Work that may harm children's' health, safety or morals, including: a) Handling of pesticides, hazardous substances or residues; b) Operating, assisting to operate, or cleaning power machinery or tools; c) Activities requiring physical exertion beyond the child's safe capacity, such as heavy lifting of loads greater than 20% of a minor's body weight; d) Work on steep slopes of more than 50%, near cliffs or drop-offs, or on roofs or ladders; e) Work in storage areas, silos and construction sites; and f) Night work."
5	Definition	""FONAP task force: The definition falls short on other minority groups, which should be included, such as: a)Race,age, color, sex, sexual orientation, gender, caste, religion, political opinion, national extraction or social origin; b)Nationality or migratory status; c)Civil status; d)Medical condition; e)Family condition, including pregnant women and parents with children, or any other protected status as included in applicable laws; f)Worker organization membership or being an organizer; g)Having filed complaints within the complaints or grievance mechanisms; h)Unequal opportunities for gender when appointing management positions; i)Political, religious, social, sexual or cultural opinions and convictions, views or affiliations of workers.""
6	Definition	FONAP task force: Agreement of mutual consent (...)
7	Definition	Use UN definition rather than wikipedia ?

#	Indicator	Comment (English)
8	Definition	HRSS - Propose to refine language e.g.: Taking advantage of a worker's disadvantaged position, which may be attributed to: (i) lack of knowledge of local/national laws; (ii) lack of fluency in local languages; (iii) limited livelihood opportunities; (iv) being an ethnic or religious minority; (v) having disabilities; or (iv) other limitations which causes the worker to be considered disadvantaged.
9	Definition	The source definition for the term 'bribe' was taken from an open-source website (i.e., https://en.wikipedia.org/wiki/Bribery) which is prone to be manipulated and biased. The source of definition should be changed to more credential source. (e.g., Transparency International) https://www.antibriberyguidance.org/guidance/5-what-bribery/guidance
10	Definition	FONAP task force: ...or influence the action, vote, or influence of a person in an official, private or public capacity.
11	Definition	HRSS - Propose to add a definition of light work: "Work that is not likely to be harmful to children's health or development and not likely to be detrimental to their attendance at school or vocational training." (Taken from: ILO Convention No. 138 in Article 7)
12	Definition	FONAP task force: Main ""more than light work"" of risk for 12-to 14-year olds should be defined for the oil palm production chain. Work harmful to children: Work that may harm children's' health, safety or morals, including: a) Handling of pesticides, hazardous substances or residues; b) Operating, assisting to operate, or cleaning power machinery or tools; c) Activities requiring physical exertion beyond the child's safe capacity, such as heavy lifting of loads greater than 20% of a minor's body weight; d) Work on steep slopes of more than 50%, near cliffs or drop-offs, or on roofs or ladders; e) Work in storage areas, silos and construction sites; and f) Night work.
13	Definition	HRSS - Propose to delete: "Those under 18 years old should not engage in hazardous work that might jeopardise their physical, mental or moral well-being, either because of its nature or the conditions under which it is carried out. For young workers above the legal minimum age but below 18, there should be restrictions on hours of work and overtime; working at dangerous heights; with dangerous machinery, equipment and tools; transport of heavy loads; exposure to hazardous substances or processes; and difficult conditions such as night work at night." - Because it is encapsulated in the proposed definition of "light work" and in indicator 6.5.3 (see our proposal in 6.5.3) where it is already covered.
14	Definition	FONAP task force: Gene products needs to be compatible with the Non-GMO requirements.
15	Definition	Why define agreement as not enforceable by law ? Should focus on 'informal' rather than risk confusion.
16	Definition	HRSS - Propose to add "All children engaged in hazardous work" as a third bullet point.

#	Indicator	Comment (English)
17	Definition	HRSS - Consider a more authoritative source, eg. : Transparency International defines bribery as: the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of money, gifts, loans, fees, rewards or other advantages (taxes, services, donations, favours etc.). - https://www.antibriberyguidance.org/guidance/5-what-bribery/guidance
18	Definition	We need additional clause on Family members and disadvantaged group
19	Definition	Is lobbying seen as bringing?
20	Definition	remove "night"
21	Definition	For Bribe, IOM proposes that the definition used be in line with the United Nations Convention against Corruption: https://www.unodc.org/unodc/en/treaties/CAC/
22	Definition	OECD guidelines for multi nationals is used broadly in EU
23	Definition	FONAP task force: Deception falls within the scope of Forced Labor and needs to be classified as such.
24	Definition	"See also: https://www.loc.gov/item/global-legal-monitor/2016-09-26/united-nations-report-on-debt-bondage/#:~:text=The%20Convention%20refers%20to%20debt,1932)%2C%20ILO%20website. "Debt bondage, although not included in the definition of forced labor under the International Labour Organization (ILO) Forced Labour Convention, can be a form of forced labor, and the two practices overlap. (Id.) The Convention refers to debt bondage as "work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily." (Id.; CO29 – Forced Labour Convention, 1930 (No. 29) (adopted June 28, 1930, entered into force May 2, 1932), ILO website.) The Supplementary Convention definition of debt bondage is broad enough, the Report comments, to cover workers in extremely different situations, "from in debt bondage in systemic, archaic, feudal systems of slave-labour exploitation," to "migrant workers from developing countries who leave their countries accruing debt to cover the costs associated with recruitment." (Report, supra, ¶ 8.) In addition, there is a close relationship between debt bondage and various forms of exploitation, "including forced labour, the abuse of migrant workers, trafficking, and the worst forms of child labour." (Id.)" See: https://www.ilo.org/empent/areas/business-helpdesk/WCMS_DOC_ENT_HLP_FL_EN/lang--en/index.htm Debt bondage is another way many workers end up in a situation of forced labour. Debt bondage exists when labourers (sometimes with their families) are forced to work for an employer in order to pay off their own debts or those they have inherited. The victims of debt bondage, if they try to leave their employment, are usually caught and returned by force. Providing wages or other compensation to a worker does not necessarily indicate that the labour is not forced or compulsory."

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25	Definition	For Debt Bondage, IOM proposes that the ILO's Indicators of Forced Labour be added as a source: https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_203832.pdf
26	Definition	FONAP task force: Need to adopt the official ILO 100 and 111 convention definition: ""•Discrimination:Distinction, exclusion or preference to invalidate or harm equality of opportunity or treatment in employment including: a)Race, color, sex, sexual orientation, gender, caste, religion, political opinion, national extraction or social origin; b)Nationality or migratory status; c)Civil status; d)Medical condition; e)Family condition, including pregnant women and parents with children, or any other protected status as included in applicable laws; f)Worker organization membership or being an organizer; g)Having filed complaints within the complaints or grievance mechanisms; h)Unequal opportunities for gender when appointing management positions; i)Political, religious, social, sexual or cultural opinions and convictions, views or affiliations of workers.
27	Definition	employee need to settle the loan, example loan to company cooperative (same with local shop) to buy personal needs.
28	Definition	FONAP task force: Decent standard of living needs to be specified according to GLWC living wage national benchmarks, protocols, and methodologies: Remuneration received for a standard 48 hours workweek by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, housing, education, health care, water, transport, clothing, other essential needs including provision for emergencies and unexpected events (Global Living Wage Coalition, www.globallivingwage.org). In the case of smallholders, it is of utmost importance to refer to Living Income (see Living Income Community of Practice) as a clear technical framework.
29	Definition	FONAP task force: Contract substitution needs to refer to ALL contract types as defined under contract".
30	Definition	add comma after place"
31	Definition	FONAP task force: Local indigenous or non-indigenous communities. Include this specification to avoid that rural non-indigenous community members are not included in the scope.
32	Definition	FONAP task force: Debt bondage is a type of forced labor and should be classified as such.
33	Definition	add (DLW)

#	Indicator	Comment (English)
34	Definition	<p>HRSS - Konveio: HRSS- Proposed wordings: A risk management process implemented by a company to identify, prevent, mitigate, and account for how it addresses legal, environmental and social risks and impacts in its operations, supply chains, and investments. This may include: (i) human rights due diligence- assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed (ii) legal due diligence- an investigation, review performed and/or research conducted on a company or business asset or a business, to confirm the facts of a matter under consideration before entering into an agreement with another party. The idea behind this investigation or review is to make sure that the investment or purchase is beneficial and to understand if there will be any future legal problems due to this acquisition. The investigation seeks to reveal all. Once the facts are collected and analysed, an informed decision can be made.</p>
35	Definition	<p>for an agreed upon task or timeframe? A person that undertakes a contract to do a job... this can also be an employee</p>
36	Definition	The first sentence repeats itself
37	Definition	HRSS- Propose to clarify what is not considered as core work to assist auditors in auditing indicator 6.2.4.
38	Definition	HRSS - Proposed definition: A contract is a legally binding promise (written or oral) between two parties which is enforceable in a court of law
39	Definition	How is this (definition of Contractors) distinguished from a supplier as defined below: "Persons or organizations that provides something needed such as a product or service."
40	Definition	Suggesting to include the definition for - Conservation Area: An area with the main purpose to conserve environmental and social values.
41	Definition	See agreement
42	Definition	FONAP task force: soil degradation also includes structural changes due to salinization or compaction.
43	Definition	FONAP task force: Please, refer to the WWF Food Security standard as an internationally recognized source of reference.
44	Definition	FONAP task force: Work by children is acceptable on family farms - runs against the child labor definition. Should state: light work or non-hazardous activities.
45	Definition	FONAP task force: gender is not only about women and men. Don't confuse biological sex with gender! Gender covers: gender identity, gender expression, and sexual orientation.
46	Definition	FONAP task force: For the sake of soil conservation, and avoidance of land slides 25 ha is an unsustainable threshold. 25 ha equals 500 m times 500 m. Consider to eliminate this threshold or adopt 0.25 ha instead of 25 ha.

#	Indicator	Comment (English)
47	Definition	<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 and 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:</p> <p>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.</p> <p>* 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.</p> <p>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.</p> <p>https://highcarbonstock.org/wp-content/uploads/2021/01/HCSA-Membership-Requirements-Review-HCSA-MR001-Version-1.pdf"</p>
48	Definition	<p>"Suggestion to include the definition for - Free, Prior, Informed Consent (FPIC): 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))"</p>
49	Definition	FONAP task force: ... women and girls or other type of gender (see previous comments on gender definition).
50	Definition	Growers definition should have 'managed' land instead of 'cultivated/harvested' oil palms
51	Definition	<p>HRSS - Propose to simplify definition-</p> <p>Work that poses an unreasonable risk to the health and safety of an employee. This includes work performed in conditions that create particular risks, such as exposure to hazardous agents, such as chemical substances or radiation. In the context of children, this means work which is likely to jeopardise children's physical, mental or moral health, safety or morals."</p>
52	Definition	<p>add : version 2.</p> <p>Suggestion to include the definition of -</p>
53	Definition	High Carbon Stock Social Requirements: Social requirements that are outlined in Module 2 of the HCSA Toolkit"
54	Definition	<p>spell out then add in parenthesis</p> <p>Health and Safety (H&S)</p>

#	Indicator	Comment (English)
55	Definition	<p>"This definition should be replaced with the High Carbon Stock Approach's full definitions of High Carbon Stock forests and potential High Carbon Stock forests. You can see HCSA's official definitions in its membership requirements document: https://highcarbonstock.org/wp-content/uploads/2021/01/HCSA-Membership-Requirements-Review-HCSA-MR-001-Version-1.pdf</p> <p>Potential High Carbon Stock forests: All areas within and outside the management of an organisation that have yet to be assessed through the application of the HCSA Toolkit that have the potential to be identified through analyses of satellite data and ground survey measurements as High Carbon Stock (HCS) forests: vegetation on the land that could be categorized as High Density Forest, Medium Density Forest, Low Density Forest or Young Regenerating Forest.</p> <p>The HCS Approach stratifies the vegetation in an area of land into six different classes using analyses of satellite data and ground survey measurements. These six classes are: High Density Forest, Medium Density Forest, Low Density Forest, Young Regenerating Forest, Scrub, and Cleared/ Open Land. The first four classes are considered potential High Carbon Stock forests.</p> <p>A definition of the HCSA should also be added as follows.</p> <p>High Carbon Stock Approach: 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."</p>
56	Definition	<p>Suggesting to change it to -</p> <p>Forests that are important to local communities or have high carbon or biodiversity values (Source: HCSA Toolkit Module 1). + "The HCSA also has a definition for Potential High Carbon Stock forests: All areas within and outside the management of an organisation that have yet to be assessed through the application of the HCSA Toolkit that have the potential to be identified through analyses of satellite data and ground survey measurements as High Carbon Stock (HCS) forests: vegetation on the land that could be categorized as High Density Forest, Medium Density Forest, Low Density Forest or Young Regenerating Forest.</p> <p>The HCS Approach stratifies the vegetation in an area of land into six different classes using analyses of satellite data and ground survey measurements. These six classes are: High Density Forest, Medium Density Forest, Low Density Forest, Young Regenerating Forest, Scrub, and Cleared/ Open Land. The first four classes are considered potential High Carbon Stock forests. "</p>
57	Definition	<p>Suggestion to include the definition for -</p> <p>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)</p>
58	Definition	Should include note that the name is not prescriptive, and can be integrated in other company structure as most practical.
59	Definition	Add "(GBV)"
60	Definition	add "(GBV)"

#	Indicator	Comment (English)
61	Definition	I suggest referring to HCV Network then the name of the source document as HCVRN is no longer called HCVRN.
62	Definition	The RSPO should review these definitions to ensure they align with definitions from the UN regarding HRDs. Also refer definitions presented by CSOs and the Zero Tolerance initiative. https://www.zerotoleranceinitiative.org/
63	Definition	This reference (the analysis made) should be updated as may be obsolete after 5 years
64	Definition	RAN would like to understand if the RSPO does have any cases it considers as 'legacy cases'. The HCSA has concluded its process for legacy cases. An update on that process can be reviewed here https://highcarbonstock.org/hcsa-legacy-cases/
65	Definition	Workers are added I believe the 2nd is better
66	Definition	HRSS - Proposed definition to expand Environmental HRD": Individuals, groups and associations who promote and protect universally recognised human rights and contribute to the effective elimination of all forms of violations of human rights and fundamental freedoms of individuals and peoples. This definition includes those who promote human rights relating to the environment, including water, air, land, flora and fauna, whistleblowers, complainants and community spokespersons. This definition does not include those individuals who commit or propagate violence. "
67	Definition	no longer relevant as only mentioned in 7.11.4 for legacy cases, and there are no legacy cases.
68	Definition	HRSS - Propose to delete as it is duplicated and workers should not be included per the RSPO HRDD Policy.
69	Definition	This definition of landscape is intended to be used in the context of site-level HCV-HCSA assessments, where assessors are required to define the wider landscape for their site-based assessments. I am not sure it is applicable to define HFCL. Better refer to the definition for "landscape" provided in this glossary (IUCN...further down).
70	Definition	RAN suggests adding the list of RSPO 'agreed' HFCC's.
71	Definition	first option seems better
72	Definition	The following three terms should be listed and defined (reference is Common Guidance): High Conservation Value (HCV): HCV is a biological, ecological, social or cultural value of outstanding significance or critical importance. There are six types of HCVs: HCV 1.... HCV 2 etc (text already included) HCV area: any area that contains one or more HCVs or which contains habitat/resources critical to maintaining the HCVs. HCV Management area: areas in a site, management unit or landscape (in this case, in the Unit of Certification) for which appropriate management decisions must be taken and implemented in order to maintain or enhance an HCV. This always includes the HCV areas found inside the management unit (the Unit of Certification) and may also include non-HCV areas (such as the plantation) where precautionary practices are implemented to avoid negative impacts on one or more HCVs.

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73	Definition	Best to reference the original ILO text where the definition is found: "ILO, 2019, General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs. https://www.ilo.org/global/topics/labour-migration/publications/WCMS_536755/lang--en/index.htm
74	Definition	HRSS- Propose to capitalise "p" in the "Indigenous people"
75	Definition	HRSS- Propose to remove as it is repeated and there is a repetition of the bullet points within the definition.
76	Definition	FONAP task force: this definition is repeated and incomplete in comparison to the next definition. There should only be one definition for the same term, not two. Indigenous peoples are in no way a homogeneous group. Women, for example, are usually particularly at risk with regard to discrimination and this should be taken into account in the respective requirements and activities.
77	Definition	FONAP task force: this definition is repeated in comparison to the previous definition. There should only be one definition for the same term, not two. Indigenous peoples are in no way a homogeneous group. Women, for example, are usually particularly at risk with regard to discrimination and this should be taken into account in the respective requirements and activities.
78	Definition	FONAP task force: falls under the definition of Forced Labor and should be classified as such.
79	Definition	As above, align with the definition of IS that is used by the HCSA 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. https://highcarbonstock.org/wp-content/uploads/2021/01/HCSA-Membership-Requirements-Review-HCSA-MR-001-Version-1.pdf
80	Definition	provided double... both definitions are the same
81	Definition	There are two definitions of indigenous people, suggest to only remain the one for P&C 2023 to avoid confusion.
82	Definition	HRSS - Incorrect definition. The correct definition is "Standards developed by the International Organization for Standardization." (taken from P&C 2013; ISO: www.iso.org)
83	Definition	FONAP task force: the definition of the landscape level needs to be conducted within a participatory approach that includes all interested local stakeholders in a representative way with democratic buy-in of these local stakeholders.

#	Indicator	Comment (English)
84	Definition	FONAP task force: the definition is misplaced and does not refer to Labour recruiters.
85	Definition	FONAP task force: the definition is misplaced and does not refer to ISO standards.
86	Definition	FONAP task force: the threshold of 10 ha needs to be eliminated, since it invites to clear forests or other natural ecosystems smaller than 10 ha. Additionally, it needs to cover the new EU regulation on deforestation-free products: The definition of degradation includes the conversion of primary forests and naturally regenerating forests into plantation forest or other forested land. DEFORESTATION and FOREST DEGRADATION need to be separately defined based on internationally accepted FAO definitions.
87	Definition	FONAP task force: the examples need to be broadened and include sexual abuse (physical and psychological).
88	Definition	Rainforest Action Network recommends the elimination of the 10ha exemption in this definition. This land clearing/deforestation loophole is not acceptable to NGOs and society and shows that the RSPO is not serious about eliminating deforestation from its certification system even in the midst of a climate crisis.
89	Definition	From: ILO: General principles and operational guidelines for fair recruitment. chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---migrant/documents/publication/wcms_703485.pdf the term labour recruiter refers to both public employment services and to private employment agencies and all other intermediaries or subagents that offer labour recruitment and placement services. Labour recruiters can take many forms, whether for profit or non-profit, or operating within or outside legal and regulatory frameworks.""
90	Definition	No definition of 'labour recruiters'.
91	Definition	actively managed may need to be defined
92	Definition	HRSS - Propose to remove the definition of legal due diligence as we have included it in the definition of Due Diligence where we have further clarified what constitutes legal due diligence and human rights due diligence (see our proposal).
93	Definition	This definition for Labour Recruiters appears to be misplaced.

#	Indicator	Comment (English)
94	Definition	<p>"HRSS- Propose to include the following as there is a need to prohibit intimidation and/or harassment against workers: "Workers: i) Loss of income and/or restricted access to the workplace, housing and/or land ii) Threats of dismissal from employment or against workers who wish to resign iii) Threats against workers during receipt of grievances regarding working and living conditions via internal (Labour Grievance Mechanism) and external (eg. embassy, NGO, etc.) grievance channels iv) Threats to terminate employment of family members v) Withdrawal of rights such as the rights to leave the workplace vi) Verbal abuse It may also include undermining of workers, i.e. psychological coercion, designed to increase the sense of vulnerability.""</p>
95	Definition	not the definition of labour recruiters
96	Definition	<p>"See comment above: this definition is intended for site -level HCV-HCSA assessments. If the term "landscape -level" is introduced here in relation to jurisdictional certification, the following definition (adapted from the HCV Screening guide by Watson, 2020) may be used: An area defined with consideration to: a. ecological or biophysical landscape boundaries (guided as far as possible by an existing national conservation framework, e.g. biogeographical zones), and b. social landscape boundaries, understood as the level at which land-use planning decisions are made e.g. the boundaries encompassing the location and distribution of ethnic groups or the extent of a customary territory, or political or administrative units (e.g. provincial or district boundaries). Often large-scale biogeographic units may be different from social boundaries. Watson, E., editor. (2020 October). High Conservation Value (HCV) Screening: Guidance for identifying and prioritising action for HCVs in jurisdictional and landscape settings. HCV Network Ltd."</p>
97	Definition	<p>HRSS- Propose to add the subheading "Communities" as (i) to (vi) refers to intimidation and/or harassment for Communities. + Maybe the opening phrase can be revised to: Refers to a range of unacceptable behaviours towards workers, communities and their members that [...], Then the content may also be merged with that from the cell below, because (i) to (iv) here may also affect workers and individuals within the communities.</p>
98	Definition	this is not the definition of ISO standards + Definition of ISO standards from 2018 P&C: "Standards developed by the International Organisation for Standardization."

#	Indicator	Comment (English)
99	Definition	HRSS - Please capitalise "C" as it is a defined term.
100	Definition	FONAP task force: this definition is inconsistent with the following one of migrant worker status" that does include within country migrants (internal migrants).
101	Definition	FONAP task force: a clearer way to defining this are the concepts of Living Wage (see Global Living Wage Coalition) and Living Income (see Living Income Community of Practice).
102	Definition	FONAP task force: DEFORESTATION and FOREST DEGRADATION need to be separately defined based on internationally accepted FAO definitions.
103	Definition	FONAP task force: Throughout the indicators, please use one homogeneous term. Please, check, since there are different terms in use (plant, mill, refinery).
104	Definition	Perhaps use the term foreign or cross-border migrant workers, if the definition is to be restricted this way. Though it is better to be consistent with the use of the word "migrant" as per IOM, since this is already being referenced.
105	Definition	Suggest that definition be made gender-neutral. Replace "his" with "their."
106	Definition	HRSS- Propose to change the definition to: Workers who have registered to be regularised under national labour recalibration/regularisation programs.
107	Definition	FONAP task force: why doesn't the scope of this definition include natural ecosystems? DEFORESTATION and FOREST DEGRADATION need to be separately defined based on internationally accepted FAO definitions.
108	Definition	The definition of: a) Mill+plantation+growers is >500ha; and b) middle-size grower without a mill 50-500ha is problematic. There are many growers >500ha without a mill. We would propose middle size grower without a mill be extended to 50-1,000ha, and JA will need to include all three scales.
109	Definition	FONAP task force: DEFORESTATION and FOREST DEGRADATION need to be separately defined based on internationally accepted FAO definitions.
110	Definition	The sentence "... do not include those workers who move within a country for the purposes of employment" - contradicts the definition of "Migrant Worker Status" below, which includes internal migrants.
111	Definition	suggest to add 'neighbouring'
112	Definition	shouldn't it say "unit of certification" instead of "management unit"?
113	Definition	that are subject...
114	Definition	For Migrant Worker Status - This phrase and its definition are unclear.
115	Definition	there is no definition for outgrower

#	Indicator	Comment (English)
116	Definition	IOM proposes that this definition (Migrant Worker) be in line with:1. the IOM Glossary on Migration (https://publications.iom.int/system/files/pdf/iml_34_glossary.pdf); and 2. International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (https://www.ohchr.org/en/instruments-mechanisms/instruments/international-convention-protection-rights-all-migrant-workers).
117	Definition	This is not a helpful definition or categorization. Perhaps "immigration status" is the more useful term/phrase that needs to be defined, especially in light of undocumented workers' vulnerability to forced labour?
118	Definition	"A more precise term for the definition provided here would be "affected local communities" or "affected communities". Note that - "directly affected communities" is used in this P&C, in 4.2 and 4.2.2 (at least) - "affected stakeholders" is used in this P&C, for example in the criterion 1.1 and indicators as well (see in 1.1.1. and 1.1.2.)"
119	Definition	HRSS- Konveio: HRSS- Propose to delete and replaced with: "A person who moves away from his or her place of usual residence, whether within a country (internal migrant) or across an international border (international migrant), temporarily or permanently, and for a variety of reasons. "
120	Definition	Konveio: HRSS- Propose to delete
121	Definition	the 3 definitions of migrants contradict each other on the terms of crossing borders or not. Migrants should cross international borders
122	Definition	Duplication with 'migrant worker' ? What is the necessity of this definition ?
123	Definition	Same as 'migrant' ? Triplication ?
124	Definition	FONAP task force: this definition is a mix of definition and requirement. The requirement portion should be removed: There shall be evidence that sufficient resources are available to carry out the plan and the plan is implemented in full.
125	Definition	FONAP task force: RSPO needs to define, which definition of peat to adopt, the parameters of the first phrase or the ones of the second phrase.
126	Definition	FONAP task force: adopt FAO definition: Pesticides are any substance or mixture of substances of chemical or biological ingredients intended for repelling, destroying or controlling any pest, or for regulating plant growth. The pesticide categorizations are not complete and exclude nematicides, virucides, molluscides, rodenticides and others.
127	Definition	Best to reference the original ILO text where the definition is found: "ILO, 2019, General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs." https://www.ilo.org/global/topics/labour-migration/publications/WCMS_536755/lang--en/index.htm
128	Definition	This page/link is not found. IOM proposes to update the source information to: IOM, 2021, Operational guidelines for Businesses on Remediation of Migrant-worker Grievances

#	Indicator	Comment (English)
129	Definition	FONAP task force: DEFORESTATION and FOREST DEGRADATION need to be separately defined based on internationally accepted FAO definitions.
130	Definition	FONAP task force: for greater clarity, this HCVRN definition should be spelled out right away, instead of referring to it.
131	Definition	<p>The definition of related costs is missing, and should match exactly to the ILO definition: When initiated by an employer, labour recruiter or an agent acting on behalf of those parties; required to secure access to employment or placement; or imposed during the recruitment process, the following costs should be considered related to the recruitment process:</p> <ul style="list-style-type: none"> i. Medical costs: payments for medical examinations, tests or vaccinations; ii. Insurance costs: costs to insure the lives, health and safety of workers, including enrollment in migrant welfare funds; iii. Costs for skills and qualification tests: costs to verify workers' language proficiency and level of skills and qualifications, as well as for location-specific credentialing, certification or licensing; iv. Costs for training and orientation: expenses for required trainings, including on-site job orientation and pre-departure or post-arrival orientation of newly recruited workers; v. Equipment costs: costs for tools, uniforms, safety gear, and other equipment needed to perform assigned work safely and effectively; vi. Travel and lodging costs: expenses incurred for travel, lodging and subsistence within or across national borders in the recruitment process, including for training, interviews, consular appointments, relocation, and return or repatriation; vii. Administrative costs: application and service fees that are required for the sole purpose of fulfilling the recruitment process. These could include fees for representation and services aimed at preparing, obtaining or legalizing workers' employment contracts, identity documents, passports, visas, background checks, security and exit clearances, banking services, and work and residence permits. <p>Enumeration of related costs in this definition is generalized and not exhaustive. Other related costs required as a condition of recruitment could also be prohibited.</p>
132	Definition	suggest to put the full HCVRN definition here
133	Definition	Need to update HCVN.
134	Definition	Possible confusion with 'remediation' in the context of RaCP ?

#	Indicator	Comment (English)
135	Definition	<p>Please add definition of "related costs", as used by ILO: "Related costs are expenses integral to recruitment and placement within or across national borders, taking into account that the widest set of related costs are incurred for international recruitment..." And, can include:</p> <ul style="list-style-type: none"> i. Medical costs: payments for medical examinations, tests or vaccinations; ii. Insurance costs: costs to insure the lives, health and safety of workers, including enrollment in migrant welfare funds; iii. Costs for skills and qualification tests: costs to verify workers' language proficiency and level of skills and qualifications, as well as for location-specific credentialing, certification or licensing; iv. Costs for training and orientation: expenses for required trainings, including on-site job orientation and pre-departure or post-arrival orientation of newly recruited workers; v. Equipment costs: costs for tools, uniforms, safety gear, and other equipment needed to perform assigned work safely and effectively; vi. Travel and lodging costs: expenses incurred for travel, lodging and subsistence within or across national borders in the recruitment process, including for training, interviews, consular appointments, relocation, and return or repatriation; vii. Administrative costs: application and service fees that are required for the sole purpose of fulfilling the recruitment process. These could include fees for representation and services aimed at preparing, obtaining or legalizing workers' employment contracts, identity documents, passports, visas, background checks, security and exit clearances, banking services, and work and residence permits. <p>13. Enumeration of related costs in this definition is generalized</p>
136	Definition	<p>IOM notes that related costs have not been defined here. For more resources, please see: IRIS Standard, Principle 1 Prohibition of recruitment fees and related costs to migrant workers: https://iris.iom.int/iris-standard IOM's Guidance Note - Recruitment Fees and Costs supports employers of migrant workers in understanding ILO's definition of recruitment fees and related costs, identifying potential recruitment fees and related costs that may be incurred during the labour migration process and determining a transparent and sustainable price for recruitment with labour recruiters: https://publications.iom.int/books/migrant-worker-guidelines-employers-guidance-note-recruitment-fees-and-related-costs</p>
137	Definition	<p>Alternative text: Refers to species that are at risk of, undergoing or have undergone severe population decline. Although the HCV definition mentions threatened and endangered species, these are often, together with vulnerable, subsumed under the overarching term threatened and endangered in an IUCN Red List context (Common Guidance for the Identification of High Conservation Values, 2017).</p>
138	Definition	<p>Former procedural Note (for 7.12.3 in 2018 P&C) has been removed. Maybe this should be discussed? It seemed intended to provide some social safeguards related to demonstrable benefits to local communities, clear recognition of legal and customary land , etc)rights</p>

#	Indicator	Comment (English)
139	Definition	Some improvements: 1. Clarify if this definition is only referring to social remediation. 2. Add references to other guidance on social remediation so the source material includes remediation of land rights violations, FPIC violations in addition to labor rights violations. 3. Complement with a similar definition for environmental restoration. 4. Both definitions should refer to the HCSA's Guidance for restoration and social remediation https://highcarbonstock.org/wp-content/uploads/2022/03/HCSA-Restoration-Remediation-Guidance_V1-approved-1-Mar-2022.pdf
140	Definition	this is confusing with the environmental remediation. Possibly this could be called social remediation?
141	Definition	Suggest to provide full term for clarity since abbreviation has not previously been used in this document. "... including palm oil mill effluent (POME)..."
142	Definition	HRSS- Propose to include reference to the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. (Source: https://www.ilo.org/declaration/lang--en/index.htm)
143	Definition	should say may or may not BE directly affected..." Note that "affected stakeholders" is being used in this P&C, for example in the criterion 1.1 and indicators as well (see in 1.1.1. and 1.1.2.)"
144	Definition	FONAP task force: this definition seems to be incomplete. Rather consider: Assisting the recovery of a natural ecosystem or other non-productive area close to its original state previous to the human intervention. DEFORESTATION and FOREST DEGRADATION need to be separately defined based on internationally accepted FAO definitions.
145	Definition	What is a semi natural state? Needs to be better defined.
146	Definition	See RAN's comment on family farms and independent smallholder definitions
147	Definition	Source link?
148	Definition	2013
149	Definition	Please change the source to: Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime https://www.unodc.org/res/human-trafficking/2021the-protocol-tip_html/TIP.pdf
150	Definition	Please change the source to: Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime https://www.unodc.org/res/human-trafficking/2021the-protocol-tip_html/TIP.pdf

#	Indicator	Comment (English)
151	Definition	FONAP task force: change wording to A migrant that migrates..." By this, the implications of the T&D of migrant will be covered.
152	Definition	This definition (transmigrant) is unclear and different from the commonly accepted definition of migrant: https://www.merriam-webster.com/dictionary/transmigrant
153	Definition	HRSS- Propose to delete this definition as it is incorrect
154	Definition	This entire last phrase need to be edited and typos revised
155	Definition	FONAP task force: for the sake of completeness, RSPO here needs to refer to all groups covered under the term Discrimination."
156	Definition	FONAP task force: the following phrase is a requirement, and hence needs to be moved to the indicator section of P&Cs: "In line with the principle of FPIC, RSPO prohibits oil palm expansion in these peoples' territories".
157	Definition	FONAP task force: This definition is incomplete and opens the gap of no compliance with labor rights for some worker types. Suggest the following wording: Any person who works on a Unit of Certification and is paid for his or her work. Encompasses all types of workers, including permanent, temporary, documented, undocumented, migrant, and transitory, and also persons temporarily absent from a job at which they recently worked for illness, parental leave, holiday, training, or industrial dispute.
158	Definition	employee - employer
159	Definition	Suggest to revise in line with the text provided in scope, which indicates mills AND GROWERS are considered "unit of certification The RSPO P&C apply to all production level companies, i.e. all mills, who do not fall under the definition of independent mill as outlined in the RSPO Supply Chain Certification (SCC) Standard; and to all growers, who do not meet the definition of Independent Smallholder or the applicability requirements as outlined in the RSPO Independent Smallholder (ISH) Standard and therefore cannot apply the RSPO ISH Standard. These are referred to as the Unit of Certification throughout this document.
160	Definition	HRSS- Change the term employee" to the term "worker"
161	Definition	HRSS - Proposed definition: Group of individuals with a specific condition or characteristic (e.g., economic, physical, political, social) that could experience negative impacts as a result of the organization's activities more severely than the general population. Examples: children and youth; elderly persons; human rights defenders; indigenous peoples; internally displaced persons; migrant workers and their families; national or ethnic, religious and linguistic minorities; persons who might be discriminated against based on their sexual orientation, gender identity; persons with disabilities; refugees or returning refugees; women.

#	Indicator	Comment (English)
162	Definition	<p>"Konveio: HRSS- Propose to have a clearer definition of Worker: "Individual that performs work for the organisation. This includes: employees, permanent workers, seasonal workers, temporary workers, day workers, casual workers, and contract workers, regardless of their nationality, type of migrant (internal migrant or international migrant), ethnicity, religion, union membership and gender."</p> <p>HRSS- To separately add the definitions for the following: 1.) Permanent full-time worker - Worker with a contract for an indeterminate period (ie. indefinite contract), whose working hours per week, month, or year are defined according to national law or practice regarding working time. 2) Day worker- A worker who is hired and paid daily wages, with no guarantee that more work is available in the future 3) Temporary worker/ Seasonal worker- Workers engaged only for a specific period of time. This includes fixed-term, project- or task-based contract workers, as well as seasonal or casual workers, including day workers 4) Casual worker- Worker engaged on a very short term or on an occasional and intermittent basis, often for a specific number of hours, days or weeks, in return for a wage set by the terms of the daily or periodic work agreement."</p>
163	Definition	FONAP task force: RSPO needs to assure consistency with the child" and "child labor" definitions.
164	Definition	HRSS- Propose to change the definition to: All workers employed by the Unit of Certification either directly or indirectly. This also includes contract workers and consultants.
165	Definition	It is suggested to change "or not be" for "beneficiary"
166	Definition	the word investors is not the correct definition in this case. the word investor must be used.
167	Definition	The definition of PP still has some elements, which leaves it to interpretation and a complex evaluation of the organization. eg Producers who have extensive plantations of other crops, producers where the family does not work the fields, or where palm is not the main source of income, but they are <50 Ha. Therefore, it should be clarified that these would be Outgrowers.
168	Definition	Primary natural forest
169	Definition	all translation fields need to be adjusted
170	Definition	We recommend that you do not take the definition from wikipedia. However, you can refer to official documents that have provided a definition of bribery or bribery, one of which is the United Nations Convention against Corruption (UNCAC).
171	Definition	In addition to due diligence and legal due diligence, there needs to be a specific term regarding human rights due diligence whose definition can be adopted from the definition provided by the OHCHR. dhttps://www.ohchr.org/en/special-procedures/wg-business/corporate-human-rights-due-diligence-identifying-and-leveraging-emerging-practices

#	Indicator	Comment (English)
1	1.1	define 'actively'
2	1.1	*engages
3	1.1	interested stakeholder not listed in definitions
4	1.1	explicitly state 'scheme' smallholder for this column throughout to avoid confusion
5	1.1	For all 3 indicator columns, could RSPO please provide rationale for developing indicators for these three business types? What is the basis?
6	1.1	Additional indicator needed to require disclosure of all legal proceedings involving the company's alleged violation or the law or accusations of corruption, tax avoidance, or violation of social and environment laws in production region.
7	1.1	Additional indicator needed to ensure the disclosure of all reported grievances or cases where affected communities claim that the company established a plantation on their lands without FPIC, or have not followed through with the agreements reached at the time when a community agreed to the establishment of a plantation on their lands.

#	Indicator	Comment (English)
8	1.1	<p>"Additional indicators are needed to ensure the provision of spatial data that assists the RSPO in monitoring compliance across the mill's plantations and the supply shed of third party suppliers . See the HCSA's requirements in E.3 https://highcarbonstock.org/wp-content/uploads/2021/01/HCSA-Membership-Requirements-Review-HCSA-MR-001-Version-1.pdf</p> <p>E.3. It is a requirement for membership that this category of companies makes public maps of operations, including plantations, forest cover, HCS forest protected and HCV areas, mills, refineries and factories, including through submitting these as shapefiles to the HCSA and the World Resources Institute (WRI) database. Best available maps of peatland will be submitted. These maps are for reference use only.</p> <p>IND: E.3.A.1. The organisation must publish and provide to the HCSA maps of operations, including boundaries of existing landbanks, development areas and/or final permit areas, existing planted areas, identified HCS forests, conservation areas for set-aside HCS forests and HCV areas. MOV 1: Applicant must submit to the HCSA shapefiles made public on own website or publicly available at the WRI database. MOV 2: Applicant must submit shapefiles to the HCSA. TIMELINE: Available at the date of application. IND: E.3.A.2. The organisation must provide to the HCSA, best available maps of peatlands (planted and unplanted) and HCV areas (delineated by HCV categories if available), land cover and mills, for the HCSA internal monitoring system. It is not a requirement for these maps to be shared to a public database and exceptions allowed for confidential data not approved for release by communities or maps of known habitat of threatened species facing poaching. MOV 1: Applicant must submit to the HCSA shapefiles. MOV 2: Applicant must submit to the HCSA shapefiles for peatlands (planted and unplanted) and HCV areas (delineated by HCV categories if available), land cover, and mills submitted to HCSA for internal use only. TIMELINE: Available at the date of application."</p>
9	1.1	<p>Regarding the comment on definitions being incomplete. The RSPO should try align its definition of terms with the HCSA and Accountability Framework initiative HCSA - https://highcarbonstock.org/wp-content/uploads/2021/01/HCSA-Membership-Requirements-Review-HCSA-MR-001-Version-1.pdf AFi definitions https://accountability-framework.org/the-framework/contents/definitions/</p>

#	Indicator	Comment (English)
10	1.1	FONAP task force: the definition section is incomplete. BMP, ASA 1 and ASA 2, ERP, ERT, FFB, ICS, ISH, mill, plant refinery, deforestation, degradation, conversion, and UoC = Unit of Certification need to be defined and should be listed consistently (with abbreviations) in the Terms and Definitions section, amongst other terms.
11	1.1.1	define 'publicly available'
12	1.1.1	1) In the RSPO P&C 2018, there is no provision regarding "confidential information". In addition, the definition of "confidential information" in this indicator is not clear, so it is prone to be used by the Certification Unit for non-transparency. 2) To whom is the information requested? Is it only directly to the Unit of Certification? If the Certification Unit is reluctant to be transparent about the document/information, can it be requested through the RSPO Secretariat?
13	1.1.1	In order to support the RSPO P&C which are concise, practical and without repetition, I propose that indicators 1.1.1 and 1.1.2 be combined because the implementation process is the same.
14	1.1.1	There are guidance notes for indicators 1.1.1 and 1.1.2: "Certification Unit must publish documents on management of the Certification Unit (1.1.1) and information on environmental, social and legal issues (1.1.2) through all media owned by the Certification Unit which can be accessed by the public, including but not limited to websites, company profiles, sustainability or annual reports etc."
15	1.1.1	1) There needs to be clarification regarding the types and documents needed 2) There needs to be clarification regarding the medium for providing information/documents, whether they can be accessed through a website, company profile, or something else? 3) No need to use the phrase "if requested". This also applies to indicators 1.1.1 and 1.1.2. This becomes out of sync, considering that there is the phrase ". . .provided/available to the public. . .", so because it is made available to the public whether requested or not requested, the Certification Unit must provide documents. This is a reflection of the principle of transparency.
16	1.1.2	FONAP task force: social needs to include labor right and community/human rights issues.
17	1.1.2	This information should be provided to all affected people automatically, not only 'on request' - same comment for all relevant indicators in this section
18	1.1.2	Social needs to include labor right and community/human rights issues.
19	1.1.3	There is no need for an annual update of records of requests for information and company responses because the list updates have been running continuously for each new incoming request and its response
20	1.1.3	To support the RSPO ToC and P&C which are concise, practical, Outcome focused, no repetition, I suggest that Indicators 1.1.3, 1.1.4 and 1.1.5 be combined starting from Consultation and Communication Procedures available, implemented and documented including requests for information and response to requests for information and a list of relevant stakeholders.
21	1.1.3	1) Input in the form of editorial changes: "Requests for information sharing along with responses from the Certification Unit are documented, published and kept updated at any time" 2) There is a guidance note for indicator 1.1.3: "The Certification Unit must publish requests for information sharing along with the responses from the Certification Unit through all media owned by the Certification Unit that can be accessed by the public and can be updated in real time, including but not limited to websites etc.

#	Indicator	Comment (English)
22	1.1.4	Maybe shorten to: "Consultation and communication procedures shall be documented, implemented, publicly disclosed and explained to relevant stakeholders."
23	1.2.1	FONAP task force: implementation of a policy needs to be clearly defined, meaning the implementation of the contents of this policy and respective impact monitoring based on social research techniques.
24	1.2.1	... Included but not limited to community representatives, state agencies, NGOs, etc.
25	1.2.1	Proposes indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicators become 1.2.1: The unit of certification owns and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy has been approved become a reference/guideline/procedure in implementing ethical code of conduct.
26	1.2.1	Proposes indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicators become 1.2.1: The unit of certification owns and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy has been approved become a reference/guideline/procedure in implementing ethical code of conduct.
27	1.2.1	Proposals for indicators 1.2.1 and 1.2.2 are combined into 1 indicator because they have the same aims and objectives. Proposed Changes to Indicators to: 1.2.1: The unit of certification owns and implements a policy of ethical behavior in all operations and transactions. Explanation: The ethical behavior policy includes references/guidelines/procedures for handling unethical behavior.
28	1.2.1	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.
29	1.2.1	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.
30	1.2.1	1) Input in the form of editorial changes: "Certification Unit must provide and implement policies for ethical behavior in all operations, transactions and all other forms of business relationships" 2) There are guidance notes for indicator 1.2: "Business relationships include relationships with business partners, entities in in the business chain"
31	1.2.1	Proposes indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicators become 1.2.1: The unit of certification owns and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy has been approved become a reference/guideline/procedure in implementing ethical code of conduct.

#	Indicator	Comment (English)
32	1.2.1	Proposes indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicators become 1.2.1: The unit of certification owns and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy has been approved become a reference/guideline/procedure in implementing ethical code of conduct.
33	1.2.1	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicators to be 1.2.1: The unit of certification owns and implements a policy of ethical behavior in all operations and transactions. Explanation:A code of ethics policy can become a reference/guide/procedure in implementing ethical code of conduct.
34	1.2.1	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation:The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.
35	1.2.1	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation:The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.
36	1.2.1	Proposes indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicators become 1.2.1: The unit of certification owns and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy has been approved become a reference/guideline/procedure in implementing ethical code of conduct.
37	1.2.1	Indicators 1.2.1 and 1.2.2 are combined into 1 indicator because they have the same aims and objectives. Proposed Changes to Indicators to: 1.2.1: The unit of certification owns and implements a policy of ethical behavior in all operations and transactions. Explanation: The ethical behavior policy includes references/guidelines/procedures for handling unethical behavior.
38	1.2.1	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation:The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.
39	1.2.1	Proposed indicators 1.2.1 and 1.2.2 are merged into 1 only, because the objective is the same. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation:The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior

#	Indicator	Comment (English)
40	1.2.1	Proposing indicators 1.2.1 and 1.2.2 to be combined because they have the same aims and objectives. 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy can become a reference without the need for special procedures
41	1.2.1	The unit of certification should make a list of unethical transactions
42	1.2.1	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior
43	1.2.1	1) Which authority can judge whether the Unit of Certification has behaved ethically or not? 2) What basis of operation will be based on reports or monitoring results? 3) Is there a sanction mechanism if criterion 1.2 is not met?
44	1.2.1	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected Parties and employees accessed by related parties, including the community, planters, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
45	1.2.2	FONAP task force: most importantly this procedure needs to lead to the implementation of just mitigation measures.
46	1.2.2	implement?
47	1.2.2	"... a procedure to detect and address actual and potential ethical misconduct."
48	1.2.2	this indicator should be combined (1.2.1 & 1.2.2) since the evidence are similar
49	1.2.2	Proposing indicators 1.2.1 and 1.2.2 to be combined into one indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation: Code of ethics policies can become the basis for guidelines/procedures in implementing ethical code of conduct.
50	1.2.2	Proposes indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicators become 1.2.1: The unit of certification owns and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy has been approved become a reference/guideline/procedure in implementing ethical code of conduct.
51	1.2.2	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.
52	1.2.2	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.

#	Indicator	Comment (English)
53	1.2.2	Proposes indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicators become 1.2.1: The unit of certification owns and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy has been approved become a reference/guideline/procedure in implementing ethical code of conduct.
54	1.2.2	Proposes indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicators become 1.2.1: The unit of certification owns and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy has been approved become a reference/guideline/procedure in implementing ethical code of conduct.
55	1.2.2	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation:The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.
56	1.2.2	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation:The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.
57	1.2.2	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation:The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.
58	1.2.2	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation:The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.
59	1.2.2	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation:The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.
60	1.2.2	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation:The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.
61	1.2.2	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation:The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.
62	1.2.2	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation:The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.

#	Indicator	Comment (English)
73	1.2.2	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.
74	1.2.2	Proposing indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicator to 1.2.1: The unit of certification has and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy can become a reference/guide/procedure in implementing code of ethics behavior.
75	1.2.2	Changing the indicator 1.2.2 sentence to become: The unit of certification must be able to show proof of the application of the code of ethics through the implementation of relevant operational procedures. (Explanation: That the application of the principles of the code of ethics has been reflected in every existing work procedure and is supplemented by an internal audit that ensures the implementation of work according to the procedure. In this way, as long as it can be shown the correct recording of the implementation of procedures and the results of the internal audit, then this the application of the code of ethics has been fulfilled (no special procedure is needed to regulate the abuse of the code of ethics))

#	Indicator	Comment (English)
1	2	FONAP task force: the definition section is incomplete. BMP, ASA 1 and ASA 2, ERP, ERT, FFB, ICS, ISH, mill, plant refinery, deforestation, degradation, conversion, and UoC = Unit of Certification need to be defined and should be listed consistently (with abbreviations) in the Terms and Definitions section, amongst other terms.
2	2	The task force needs to reconsider the conditions on the ground if it wants to adhere to criterion 2.3 where many FFB suppliers (direct or indirect) refuse to provide access to information regarding their legal status (eg land legality), because they perceive this as something that is illegal. private and confidential so they are quite protective. This means that there will also be challenges in fulfilling indicator 2.2.2 regarding the legality of FFB suppliers.
3	2.1	*complies
4	2.1.1	For the word "agreements" under 2.1.1 C - IOM proposes to include multilateral and bilateral agreements on labour migration.
5	2.1.1	FONAP task force: The Unit of Certification shall demonstrate compliance with...
6	2.1.1	Proposal 1 : Agree in mastery, but added in accordance with interested parties Proposal 2 : Removed the word "including control and utilization" and added according to interested parties
7	2.1.2	Revise "shall have and implemented" to "shall implement"
8	2.1.2	FONAP task force: ...for ensuring legal compliance is implemented and demonstrated
9	2.1.2	There needs to be a clear definition of what is meant by a "documented system".
10	2.1.3	should be simplified until legal status ... demonstrate its legal status and its boundaries are clearly...
11	2.1.3	FONAP task force: ..., including legitimate land use rights for the scope of its boundaries, that are clearly and visibly defined and maintained. THIS CRITERION NEEDS TO BE UPSCALED TO CRITICAL C.
12	2.1.3	Smallholders may have problems demonstrating their legal status regarding land tenure; Proof of ownership, customary rights, or other land user rights to the land by the farmers;
13	2.1.3	What about adding "proof of customary rights or other land user rights" as done in 2.3.1 C (for mill with own plantation and growers)?
14	2.1.3	Agree with Proposal 2: Removed the word "including control and utilization" and added in accordance with the parties concerned in a clear and well-maintained manner
15	2.2.2	"Proposal 1: In more detail regarding permits, at least it states what permits are needed Proposal 2: Indicators 2.2.2 and 2.2.3 Merged and added words of information related to legality Being: The unit of certification provides information on the legality of all third parties, recruiters workers, service providers and contracted labor contractors."

#	Indicator	Comment (English)
16	2.2.2	- Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors.
17	1.2.1	"Proposes indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicators become 1.2.1: The unit of certification owns and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy has been approved become a reference/guideline/procedure in implementing ethical code of conduct."
18	2.1.3	Agree with Proposal 2: Removed the word "including control and utilization" and added in accordance with the parties concerned in a clear and well-maintained manner
19	2.1.3	Indicator 2.1.3 Differences in translation: The Unit of Certification shall demonstrate its legal status, including tenure and use and its boundaries are clearly and visibly defined and maintained. Suggestion: To remove the words "including mastery and utilization". Translation to follow the English version; The Unit of Certification shall demonstrate its legal status, and its boundaries are clearly and visibly defined and maintained.
20	2.1.3	There is a guidance note for indicator 2.1.3 "Certification Unit must show/publish its legal status, including control, use, and land boundaries through all media owned by the Certification Unit that can be accessed by the public including but not limited to websites, company profile, sustainability or annual report etc"
21	2.1.3	Indicator 2.1.3. The Unit of Certification shows its legal status, including ownership, utilization, and land boundaries which are determined by the government and managed clearly.
22	2.1.3	The Unit of Certification shall demonstrate its legal status, including tenure and use and its boundaries are clearly and visibly defined and maintained. Suggestion: To remove the words "including mastery and utilization". Correction of the Indonesian translation so that it follows the English version; The Unit of Certification shall demonstrate its legal status, and its boundaries are clearly and visibly defined and maintained. The Unit of Certification must show the legal status and limits clearly and maintained in accordance with the applicable national regulations
23	2.1.3	Removed the word "including tenure and utilization" and added "according to interested parties in a clear and well-maintained manner"
24	2.1.3	Agree with Proposal 2: Removed the word "including control and utilization" and added in accordance with the parties concerned in a clear and well-maintained manner
25	2.1.3	Removed the word "including tenure and utilization" and added according to the parties concerned in a clear and well-maintained Revision Proposal: The unit of certification shows its legal status and land boundaries are defined and managed in a clear and transparent manner.
26	2.1.3	Proposal 1 : Agree in mastery, but added in accordance with interested parties Proposal 2 : Removed the word "including control and utilization" and added according to interested parties

#	Indicator	Comment (English)
27	2.1.3	Proposal 1 : Agree in mastery, but added in accordance with interested parties Proposal 2 : Removed the word "including control and utilization" and added according to interested parties
28	2.1.3	Removed the word "including control and utilization" and added in accordance with the parties concerned in a clear and well-maintained manner
29	2.1.3	Agree with Proposal 2: Removed the word "including control and utilization" and added in accordance with the parties concerned in a clear and well-maintained manner
30	2.1.3	Agree with Proposal 2: Removed the word "including control and utilization" and added in accordance with the parties concerned in a clear and well-maintained manner
31	2.1.3	Agree with Proposal 2: Removed the word "including control and utilization" and added in accordance with the parties concerned in a clear and well-maintained manner
32	2.2	better to classify 2.2 for Legal Contractors only & 2.3 for Legal FFB Suppliers
33	2.2	Proposal: Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Proposal: Remove FFB suppliers because they are already covered in Criterion 2.3. Proposed Change of Indicators to: 2.2.2. The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors.
34	2.2.1	FOR MILLS > The list of contracted parties should cover all growers, MB certified or not
35	2.2.2	Propose to change "Commits to" to "UoC contracts or engages"
36	2.2.2	The Unit of Certification shall demonstrate the selection of contracted third parties that comply with respective national environmental and labor laws and have the respective licenses of operation.
37	2.2.2	IOM proposes the following language for clarity: "The Unit of Certification shall ensure the legality of all contracted 3rd parties INCLUDING labour recruiters, service providers and labour contractors." This suggestion applies to all 3 indicators columns for line 2.2.2.
38	2.2.2	Propose to combine the indicator 2.2.2 and 2.2.3 regarding the legality of the contractor, to avoid redundancy.
39	2.2.2	The verification of legality of contracted parties should be updated regularly
40	2.2.2	FONAP task force: The Unit of Certification shall demonstrate the selection of contracted third parties that comply with respective national environmental and labor laws and have the respective licenses of operation.
41	2.2.2	Agree with Proposal 2: Remove the word "including control and utilization" and with the addition of clear and well-maintained contents regarding interested parties
42	2.2.2	The sentence "including mastery and utilization" can be deleted and added the sentence "according to interested parties in a clear and well-maintained manner". Proposed Revision: "Certification Unit shows its legal status and land boundaries are determined according to the parties concerned and managed in a clear and well-maintained manner."

#	Indicator	Comment (English)
43	2.2.2	Indicators 2.2.2 and 2.2.3 are just combined and information related to legality is added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors.
44	2.2.2	Eliminate FFB suppliers because they have been covered in indicator 2.3.1, so they don't repeat the FFB suppliers
45	2.2.2	- Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
46	2.2.2	Proposal 1: In more detail regarding permits, at least it states what permits are needed Proposal 2: Indicators 2.2.2 and 2.2.3 Merged and added words of information related to legality Becoming: The unit of certification provides legality information to all third parties, labor recruiters , service providers and contracted labor contractors.
47	2.2.2	- Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
48	2.2.2	- Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. - Removing FFB suppliers because they are included in indicator 2.3.1 Proposed revision: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors.
49	2.2.2	" - Indicators 2.2.2 and 2.2.3 Merged and added information words related to legality. Become: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removes FFB suppliers because they have already covered on 2.3.1" indicator
50	2.2.2	" - Indicators 2.2.2 and 2.2.3 Merged and added information words related to legality. Become: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removes FFB suppliers because they have already covered on 2.3.1" indicator
51	2.2.2	Indicators 2.2.2 and 2.2.3 are combined because they are related to the legality of all third parties, labor recruiters, service providers, and contracted labor contractors. Meanwhile, FFB suppliers fall into criterion 2.3.
52	2.2.2	- Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
53	2.2.2	- Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1

#	Indicator	Comment (English)
54	2.2.2	In determining the Guide, it is necessary to explain related to: 1. legality that must be met. 2. The need for positive discrimination for local contractors in fulfilling their legality (legality/information from the local government) to facilitate access for local communities to get contract opportunities to increase welfare.
55	2.2.2	Proposal: Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Proposed Change of Indicators to: 2.2.2. The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. Proposal: Remove FFB suppliers because they are already covered in Criterion 2.3. 2.3 The unit of certification ONLY obtains FFB from legal suppliers.
56	2.2.2	- Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
57	2.2.2	Indicators 2.2.2 and 2.2.3 should be combined because they both state that a third party must have legality. while FFB Suppliers are regulated in indicator 2.3.1. Proposed Revision of amalgamation : The Certification Unit provides information on the legality of all third parties, labor recruiters, service providers and contracted labor contractors.
58	2.2.2	"Proposal 1: In more detail regarding permits, at least it states what permits are needed Proposal 2: Indicators 2.2.2 and 2.2.3 Merged and added words of information related to legality Being: The unit of certification provides information on the legality of all third parties, recruiters workers, service providers and contracted labor contractors."
59	2.2.2	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
60	2.2.2	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
61	2.2.2	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
62	2.2.2	"Proposes indicators 1.2.1 and 1.2.2 to be combined into 1 indicator because they have the same aims and objectives. Proposed Indicators become 1.2.1: The unit of certification owns and implements a policy of ethical behavior in all operations and transactions. Explanation: The code of ethics policy has been approved become a reference/guideline/procedure in implementing ethical code of conduct."

#	Indicator	Comment (English)
63	2.2.2	Indicators 2.2.2 and 2.2.3 are combined and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
64	2.2.2	" - Indicators 2.2.2 and 2.2.3 Merged and added information words related to legality. Become: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removes FFB suppliers because they have already covered on 2.3.1" indicator
65	2.2.2	Indicators 2.2.2 and 2.2.3 Merged and added information words related to legality. Become: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removes FFB suppliers because they have already covered on 2.3.1" indicator
66	2.2.2	" - Indicators 2.2.2 and 2.2.3 Merged and added information words related to legality. Become: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removes FFB suppliers because they have already covered on 2.3.1" indicator
67	2.2.2	- Indicators 2.2.2 and 2.2.3 Merged and added information words related to legality. Become: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removes FFB suppliers because they have already covered on 2.3.1" indicator
68	2.2.2	- Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
69	2.2.2	- Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
70	2.2.2	Proposal 1: In more detail regarding permits, at least it states what permits are needed Proposal 2: Indicators 2.2.2 and 2.2.3 Merged and added words of information related to legality Becoming: The unit of certification provides legality information to all third parties, labor recruiters , service providers and contracted labor contractors.
71	2.2.2	- Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
72	2.2.2	- Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
	2.2.2	Define the scope of contractor. FFB supplier should be moved to 2.3. Valid license what is means?

#	Indicator	Comment (English)
73	2.2.3	Propose to combine the indicator 2.2.2 and 2.2.3 regarding the legality of the contractor, to avoid redundancy.
74	2.2.3	The term "be legal" is wrong. Each FFB supplier must "must comply with national law" showing the company name based on the requirements of the country's law.
75	2.2.3	FOR MILLS > MB mills should ensure legality of contracted parties through ISPO and MSPO certification documents
76	2.2.3	"All contractors and FFB suppliers,..., shall be legal". What does it mean as it may vary between countries? May be separate (i) legal person (ii) legal entity
77	2.2.3	[Jakarta Consultation W/S, 6 Dec 2022] 2.2.2 & 2.2.3 - what level of proof of legality is required?
78	2.2.3	Not all contractors in all countries require legal licenses to operate; therefore the requirement should be read "to demonstrate the legality of the operation of contractors and FFB suppliers".
79	2.2.3	...valid licenses... documented: please specify (according to countries)
80	2.2.3	FONAP task force: this criterion 2.2.3 should be merged with 2.2.2
81	2.2.3	Proposal: Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Proposed Change of Indicators to: 2.2.2. The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. Proposal: Remove FFB suppliers because they are already covered in Criterion 2.3. 2.3 The unit of certification ONLY obtains FFB from legal suppliers.
82	2.2.3	Indicators 2.2.2 and 2.2.3 are combined and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
83	2.2.3	- Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
84	2.2.3	- Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
85	2.2.3	Proposal: Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Proposed Change of Indicators to: 2.2.2. The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. Proposal: Remove FFB suppliers because they are already covered in Criterion 2.3.

#	Indicator	Comment (English)
86	2.2.3	Indicators 2.2.2 and 2.2.3 are combined and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
87	2.2.3	Translation to follow the English version; The Unit of Certification shall demonstrate its legal status, and its boundaries are clearly and visibly defined and maintained.
88	2.2.3	- Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
89	2.2.3	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
90	2.2.3	"Proposal 1: In more detail regarding permits, at least it states what permits are needed Proposal 2: Indicators 2.2.2 and 2.2.3 Merged and added words of information related to legality Being: The unit of certification provides information on the legality of all third parties, recruiters workers, service providers and contracted labor contractors.
91	2.2.3	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
92	2.2.3	Indicators 2.2.2 and 2.2.3 regulate the same thing, namely the legality of third parties, it is better if the two indicators are combined
93	2.2.3	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
94	2.2.3	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
95	2.2.3	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
96	2.2.3	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
97	2.2.3	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1

#	Indicator	Comment (English)
98	2.2.3	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
99	2.2.3	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
100	2.2.3	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
101	2.2.3	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
102	2.2.3	mentioned in the guidelines for minimum permits that must be met, especially for FFB contractors and suppliers
103	2.2.3	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
104	2.2.3	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
105	2.2.3	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
106	2.2.3	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
107	2.2.3	Indicators 2.2.2 and 2.2.3 are merged and words of information related to legality are added. Being: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removing FFB suppliers because they are included in indicator 2.3.1
108	2.2.3	Agree with Proposal 2: Removed the word "including control and utilization" and added according to the parties concerned in a clear and well-maintained manner. Because the language of the authorities and usage is not quite right for Indonesia (incorrect translation).

#	Indicator	Comment (English)
109	2.2.3	" - Indicators 2.2.2 and 2.2.3 Merged and added information words related to legality. Become: The unit of certification provides legality information to all third parties, labor recruiters, service providers and contracted labor contractors. - Removes FFB suppliers because they have already covered on 2.3.1" indicator
110	2.2.3	Proposal 1: Agree in controlling, but added according to interested parties Proposal 2: Removed the word ""including control and utilization"" and added according to interested parties
111	2.2.4	FONAP task force: the wording of this indicator is unclear. Consider: All contracted third parties shall prove they do not use child, forced or trafficked labor.
112	2.2.4	It is important to consider that for small producers there is the use of family labor.
113	2.2.4	Indicator 2.2.4 does not need to stipulate the inclusion of commitments (not using child labour, young labour, forced labour, and the results of human trafficking) in the contract clause, it is enough to stipulate that this is disseminated to related third parties.
114	2.2.4	"Proposal 1: In more detail regarding permits, at least it states what permits are needed Proposal 2: Indicators 2.2.2 and 2.2.3 Merged and added words of information related to legality Being: The unit of certification provides information on the legality of all third parties, recruiters workers, service providers and contracted labor contractors."
115	2.2.4	The TF needs to approve the proposed changes: Editorial changes to indicator 2.4.1 "accessible for women and children" so that they are removed because women and children are already part of the affected parties or related stakeholders. Proposal 2: Changing Indicators to: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive) and accessible to relevant parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
116	2.2.4	"Proposed Editorial Change: Removed ""accessible for women and children"" "

#	Indicator	Comment (English)
117	2.3	<p>-What FFB from legal suppliers entails here are origin, ownership and licence to operate. It does not include the full legal compliance e. g. as required by criterion 2.1 on compliance with all legal requirements such as regulations on labour, agricultural practices and the environment for the unit of certification</p> <p>-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: (i) Illegal sources not complying with all applicable local, national and ratified international laws and regulations (ii) deforestation/degradation has occurred or is occurring (iii) new development on peatland (iv) exploitation of workers, local communities or small-scale growers.</p> <p>-Main challenge is the collaboration with the collection centres because of the typical existence of multiple layers of traders involved Therefore,</p> <p>-It is important to highlight the context of current developments of EU deforestation legislation or various national due diligence legislation where legality may be defined more broadly.</p> <p>-It is important to have a clear ToR and timeline for the taskforce for developing this procedure involving CBs and producers in various countries (SEA, Latam, Africa): guidances for certificate holder, guidance for auditors.</p> <p>-Require taskforce to start immediately as this criteria was in place in P&C 2018.</p>
118	2.3	RSPO mills must implement a legal audit mechanism for all their suppliers, certified or not. This could be a certification with an existing national standard (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance
119	2.3	*sources
120	2.3	In view of the forthcoming legislation on import markets, it is necessary to set up action mechanisms for these criteria. These criteria are already mandatory (since 2018) to be RSPO MB compliant. I would like to recommend creation of a multi-stakeholder taskforce at RSPO level to propose solutions that are auditable for implementation of this indicator, which is not verifiable today and will become mandatory for legal due diligence. The objective of this taskforce would be to pool the obligations and possibilities of each player in order to implement concrete and feasible measures.
121	2.3	<p>Recommend creation of a multi-stakeholder taskforce at RSPO level to propose solutions that are auditable for implementation of this indicator, which is not verifiable today and will become mandatory for legal due diligence.</p> <p>On the topic of Geolocation: Traceability is possible today for all growers, including smallholders. National traceability initiatives could be of support, such as Malaysia Palm Oil Board's traceability work. MB mills should declare concession maps of all suppliers, certified or not, using the GeoRSPO platform</p> <p>On the topic of legality: RSPO MB mills could 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)
122	2.3	<p>In view of the forthcoming legislation on import markets, it is necessary to create additional mechanisms to support implementation of these criteria.</p> <p>Recommend the creation of a multi-stakeholder taskforce at RSPO level to propose solutions that are auditable for implementation of this indicator, which is not verifiable today and will become mandatory for legal due diligence. The objective of this taskforce would be to gather inputs and propose concrete and feasible mechanisms to improve auditability.</p> <p>On the topic of geolocation, national traceability initiatives could be of support, such as Malaysia Palm Oil Board's traceability work. MB mills should declare concession maps of all suppliers, certified or not, using the GeoRSPO platform.</p> <p>On the topic of legality, RSPO mills must implement a legal audit mechanism for all suppliers, certified or not. This could be a certification within an existing national standard (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance.</p>
123	2.3	<p>This Criteria should 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</p>
124	2.3	<p>Revise to *from legally compliant suppliers. Legal compliance should entail full compliance with regulations not just of business operation/licensing/permits, etc. but should also encompass labor and employment (including recruitment), agricultural practices, environment, health & safety regulatory compliance.</p>
125	2.3	<p>Proposed sentences for criterion 2.2 : "The unit of certification is committed to entering into work contracts or cooperating with legal contractors and FFB providers". (Explanation: The sentence proposal for criterion 2.2 removes the word "ONLY" because it is still a challenge and requires a process for external parties to fulfill all legal requirements).</p>
126	2.3.1	<p>Traceability is possible theoretically today for all growers, including smallholders. National traceability initiatives could be of support, such as Malaysia Palm Oil Board's traceability work. MB mills should declare concession maps of all suppliers, certified or not, using the GeoRSPO platform</p>
127	2.3.1	<p>Suggest to synchronize the wording used in 2.3.1 and 2.3.2, for consistency : Should decide whether the word used is obtained or documented?</p>
128	2.3.1	<p>RSPO mills must implement a legal audit mechanism for all their suppliers, certified or not. This could be a certification with an existing national standard (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance</p>

#	Indicator	Comment (English)
129	2.3.1	<p>In view of the forthcoming legislation on import markets, it is necessary to set up action mechanisms for these criteria. These criteria are already mandatory (since 2018) to be RSPO MB compliant.</p> <p>Recommend the creation of a multi-stakeholder taskforce at RSPO level to propose solutions that are auditable for implementation of this indicator, which is not verifiable today and will become mandatory for legal due diligence. The objective of this taskforce is to pool the obligations and possibilities of each player in order to implement concrete and feasible measures.</p> <p>Operational solutions-on the topic of geolocation:</p> <ul style="list-style-type: none"> •Traceability is possible theoretically today for all growers, including smallholders. National traceability initiatives could be of support, such as Malaysia Palm Oil Board's traceability work. •MB mills should declare concession maps of all suppliers, certified or not, using the GeoRSPO platform <p>Operational solutions-on the topic of legality:</p> <ul style="list-style-type: none"> •RSPO mills must implement a legal audit mechanism for all their suppliers, certified or not. •This could be a certification with an existing national standard (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance
130	2.3.1	What proof of customary rights is the RSPO accepting? Please add guidance that is aligned with international human rights norms.
131	2.3.1	Traceability is possible theoretically today for all growers, including smallholders. National traceability initiatives could be of support, such as Malaysia Palm Oil Board's traceability work. •MB mills should declare concession maps of all suppliers, certified or not, using the Geo RSPO platform
132	2.3.1	[Jakarta Consultation W/S, 6 Dec 2022] 2.3.1 concerns over SH areas fall within conservation/forest reserve and the potential of excluding the FFB produced.
133	2.3.1	FONAP task force: please, improve the wording to make it clear.
134	2.3.1	<p>The RSPO standard will be heavily criticized if it continues to include these exemptions for medium sized growers and smallholder farmers. This indicator must be applicable to all three categories.</p> <p>The reputation of the RSPO and its members will continue to be discredited if NGOs continue to identify cases where FFB is sourced from illegal plantations, including in protected areas, as shown in RAN's recent Carbon Bomb report. ran.org/carbonbomb.</p> <p>The EU requirements for Geolocation data demonstrates that to be relevant the RSPO must ensure effective traceability systems are in place—that is not the case now in Indonesia.</p>

#	Indicator	Comment (English)
135	2.3.1	<p>The RSPO standard will be heavily criticized if it continues to include these exemptions for medium sized growers and smallholder farmers. This indicator must be applicable to all three categories.</p> <p>The reputation of the RSPO and its members will continue to be discredited if NGOs continue to identify cases where FFB is sourced from illegal plantations, including in protected areas, as shown in RAN's recent Carbon Bomb report. ran.org/carbonbomb</p> <p>The EU requirements for Geolocation data demonstrates that to be relevant the RSPO must ensure effective traceability systems are in place—that is not the case now in Indonesia.</p>
136	2.2.1	Eliminate FFB suppliers because they have been covered in indicator 2.3.1
137	2.3.1	<p>1) How to simplify the smallholder supply chain process? and how to determine which smallholders do not meet the criteria</p> <p>2) Is this provision cumulative or alternative?</p> <p>3) Which indicator has the highest degree of obligation?</p>
	2.3.1	Remove 'where applicable'
138	2.3.2	Given the growing requirements for traceability to plantation/farms, just geolocation is not sufficient but also a polygon map with latitudes and longitudes. For PO Mills to be certified as MB certified mills, they would need to provide this information. Lack of full implementation is a big risk for RSPO's credibility and relevance in global markets.
139	2.3.2	In P&C 2018, there are agents and other intermediaries. It is not in this revised indicator. Propose to make this clear whether agents & other intermediaries are part of traders/dealers. Need to be clear in the glossary.
140	2.3.2	<p>Traceability is possible theoretically today for all growers, including smallholders. National traceability initiatives could be of support, such as Malaysia Palm Oil Board's traceability work.</p> <p>MB mills should declare concession maps of all suppliers, certified or not, using the GeoRSPO platform</p>
141	2.3.2	<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
142	2.3.2	For New Collector, Growers/Mills need step by step approach to access all Geolocation of FFB, depend on total area, total farmers and other mills competitor (non RSPO member) at 50 Km range
143	2.3.2	<ul style="list-style-type: none"> •Traceability is possible theoretically today for all growers, including smallholders. National traceability initiatives could be of support, such as Malaysia Palm Oil Board's traceability work. •MB mills should declare concession maps of all suppliers, certified or not, using the Geo RSPO platform

#	Indicator	Comment (English)
144	2.3.2	A gradual approach 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. ran.org/carbonbomb
145	2.3.2	RSPO mills must implement a legal audit mechanism for all their suppliers, certified or not. This could be a certification with an existing national standard (ISPO, MSPO, etc.) which would guarantee a minimum verification on legal compliance
146	2.3.2	The term traders can be confusing when referring to dealers and collection points. Should the terms the RSPO uses be revised to align with the AFI definitions of traders? https://accountability-framework.org/the-framework/contents/definitions/
147	2.3.2	[Abidjan, 13 Dec 2022] This is challenging - especially when trader and SH supplying to trader is not willing to provide relevant information and data. RSPO to provide stepwise approach into full compliance.
148	2.3.2	[Jakarta Consultation W/S, 6 Dec 2022] similarly - how mill can build the trust to ensure necessary information and data are to be shared with miller/ growers by the third party trader.
149	2.3.2	See RAN comments on the indicator above
150	2.3.2	"FONAP task force: please, improve the wording to make it clear. Please, delete the procedural note, as RSPO as a system should ensure that ALL of its P&C and related indicators are auditable - without any exception - and to reach this uses a range of tools: guidance, training, shadow audits, and so forth."
151	2.3.2	Why would this geolocation element not be applicable to smaller growers or smallholders? If the intention is the help the P&C align with the incoming EU legislation, which is a good intention, this would need to apply to all farmers.
152	2.3.2	as above, The RSPO standard will be heavily criticized if it continues to include these exemptions for medium sized growers and smallholder farmers. This indicator must be applicable to all three categories. The reputation of the RSPO and its members will continue to be discredited if NGOs continue to identify cases where FFB is sourced from illegal plantations, including in protected areas, as shown in RAN's recent Carbon Bomb report. ran.org/carbonbomb The EU requirements for Geolocation data demonstrates that to be relevant the RSPO must ensure effective traceability systems are in place—that is not the case now in Indonesia.
153	2.3.2	The RSPO standard will be heavily criticized if it continues to include these exemptions for medium sized growers and smallholder farmers. This indicator must be applicable to all three categories. The reputation of the RSPO and its members will continue to be discredited if NGOs continue to identify cases where FFB is sourced from illegal plantations, including in protected areas, as shown in RAN's recent Carbon Bomb report. ran.org/carbonbomb The EU requirements for Geolocation data demonstrates that to be relevant the RSPO must ensure effective traceability systems are in place—that is not the case now in Indonesia.
	2.3.2	TF to provide timeline for practical implementation

#	Indicator	Comment (English)
	2.3.2	Please provide guidance if supplier refuse to provide information requested? TF need to consider a stepwise approach for full traceability and data collection involving third party supplier
154	2.4	Criteria 2.4 and 2.5 is better suited for 4 or 6 which is social and not legality/prosperity and avoid repetition
155	2.4	Guidance on the expectation in terms of means and tools used should be given based on the profile of the Unit of certification
156	2.4	*mutually agreed upon.. with whom?
157	2.4	For grievance mechanism and access to remedy - Please see: IRIS Standard, Principle 5: Respect for Access to Remedy: https://iris.iom.int/iris-standard IOM's Migrant Worker Guidelines for best practices on grievance mechanisms at page 12: https://publications.iom.int/books/migrant-worker-guidelines-employers IOM's Operational guidelines for Businesses on Remediation of Migrant-worker Grievances for more detailed guidelines here. This includes specific considerations for remediation programmes in the palm oil industry: https://publications.iom.int/books/operational-guidelines-businesses-remediation-migrant-worker-grievances . IOM also suggests language is aligned with UNGPs effectiveness criteria
158	2.4	We welcome the addition of this new criteria
159	2.4	An effective grievance system that is results-focused and trusted by workers can help address the health, safety, and human rights issues that workers face on any job site. See the UN's Office of the High Commissioner for Human Rights' Protect, Respect and Remedy Framework and Verité's Fair Hiring Toolkit for guidance on Establishing Effective Grievance Mechanisms & Protection for Whistleblowers.
160	2.4	Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of the affected Parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
161	2.4.1	2.4.1 is this aligned with the UNGP -UN Guiding Principles on Business and Human Rights? i.e. based on engagement and dialogue?
162	2.4.1	For mill and large growers, the grievance procedure should be published on the web page or other electronic means of communication, like social media.
163	2.4.1	For the mill and large growers: The CH should publish the link to the CB and AB grievance mechanism
164	2.4.1	All grievances should be announced to the CB that issued the certificate.
165	2.4.1	The grievance mechanism should secure an initial response to the complainant in a maximum period of time of XX days, and no complaint should remain unresponded.

#	Indicator	Comment (English)
166	2.4.1	It should be standardize across all Criteria and Indicators on the term of workers vs workforce to avoid confusion. From the glossary of P&C 2018, workers are referring to employees from all levels of the organization. While workforce is referring to workers employed directly or indirectly by the certification unit. From these 2 definitions, it can be read that 'workers' are only apply to those directly employed by the certification unit, not include the contractors' workers. And 'workforce' cover all type/level of workers.
167	2.4.1	Guidance on “other relevant stakeholders” should be given, notably for smallholders (village or cooperative representatives?) Guidance on appropriate remedies should be clarified
168	2.4.1	The registry of grievances must be public.
169	2.4.1	“The outcome shall be made available and communicated” > it should be specified to whom? Publicly available? Available to the parties involved in the grievance? To all workers and stakeholders involved in the certified entity?
170	2.4.1	RAN welcomes the addition of this new criteria but it needs improvement so it requires grievance mechanism to be aligned with the UN Guiding Principles on Business on Human Rights. HCSA's requirement is as follows: C.1.A.3: There must be a grievance mechanism aligned with the UN Guiding Principles on Business and Human Rights in place to respond to, and address, grievances arising from the implementation of HCSA in its own operations. MOV 1: Publicly available grievance mechanism. MOV 2: List of submitted grievances against the implementation of HCSA and/or moratorium, and a summary of follow up action. TIMELINE: Submitted by end January each year. https://highcarbonstock.org/wp-content/uploads/2021/01/HCSA-Membership-Requirements-Review-HCSA-MR-001-Version-1.pdf The registry of grievances must be public.
171	2.4.1	Most importantly the Unit of Certification shall monitor and demonstrate the effectiveness of such Grievance Mechanism through social research by an independent third party. Please, clarify, what this means: Facilitate effective access to appropriate remedies. The term GRIEVANCE MECHANISM needs to be included in the definitions section. How will this grievance mechanism look like for smallholders? Trusted relationship between group members and group administrator with the latter channeling complaints up to the value chain? The FONAP task force can support with this challenge.
172	2.4.1	"FONAP task force: most importantly the Unit of Certification shall monitor and demonstrate the effectiveness of such Grievance Mechanism through social research by an independent third party. FONAP task force: Please, clarify, what this means: Facilitate effective access to appropriate remedies. FONAP task force: The term GRIEVANCE MECHANISM needs to be included in the definitions section. How will this grievance mechanism look like for smallholders? Trusted relationship between group members and group administrator with the latter channeling complaints up to the value chain? The FONAP task force can support with this challenge."
173	2.4.1	This must apply to all medium sized growers

#	Indicator	Comment (English)
174	2.4.1	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.
175	2.4.1	Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of the affected Parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
176	2.4.1	Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of the affected Parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
177	2.4.1	KLK's suggestion: Just combine indicators 2.4.1 and 2.4.2 because the aims and objectives are the same and the verifiers needed are also the same. Proposed indicators: 2.4.1- The Certification Unit must establish and socialize and implement a Grievance Handling Mechanism (that is gender and child sensitive) and accessible to relevant parties, including the community, smallholders, workers, their representatives, women and children (if possible/ necessary), as well as other relevant stakeholders. Socialization is carried out in a language that can be understood, including by illiterate and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism. This mechanism should include the following elements: i) procedures, access modalities and timelines for receiving, acknowledging, processing, investigating, responding and resolving complaints/complaints; ii) maintenance of a register of received complaints; ii) safeguarding the identity (anonymity) of the complainant, as well as guaranteeing and respecting confidentiality; iii) allow the complaining party to access relevant sources of information, independent legal and technical advice, and independent dispute resolution mechanisms; iv) provision of effective access to appropriate remedial measures; v) absence of interference in efforts to achieve appropriate remedies (legal/non-legal); and vi) protection against retaliation or intimidation as a consequence of the use of complaints and grievance handling mechanisms.
178	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."

#	Indicator	Comment (English)
179	2.4.1	Proposed change of indicators : The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive) and accessible to relevant parties, including the community, smallholders, workers, their representatives, women and children (if possible/needed), as well as stakeholders other related interests.
180	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
181	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
182	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
183	2.4.1	Proposal 1: Editorial changes to indicator 2.4.1 "accessible for women and children" to be removed because women and children are already part of the affected parties or related stakeholders. Proposal 2: Changing Indicators to: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive) and accessible to relevant parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
184	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
185	2.4.1	Proposed Editorial Change: Removed "accessible for women and children"

#	Indicator	Comment (English)
186	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
187	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
188	2.4.1	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children are already part of the affected parties and employees. Proposed Editorial Change 2: "Certification Unit must establish and implement a Grievance Handling Mechanism (that is gender and child sensitive) and accessible to relevant parties, including communities, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
189	2.4.1	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children are already part of the affected parties and employees. Proposed Editorial Change 2: "Certification Unit must establish and implement a Grievance Handling Mechanism (that is gender and child sensitive) and accessible to relevant parties, including communities, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
190	2.4.1	Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
191	2.4.1	Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.

#	Indicator	Comment (English)
192	2.4.1	Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
193	2.4.1	Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
194	2.4.1	Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
195	2.4.1	Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
196	2.4.1	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
197	2.4.1	Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
198	2.4.1	Proposed Changes : The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive) and accessible to relevant parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as stakeholders other related.

#	Indicator	Comment (English)
199	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
200	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
201	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
202	2.4.1	Representation of children has become part of the workers and planters because they are family members, so those who file complaints are from the child's parents.
203	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
204	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
205	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
206	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
207	2.4.1	"Proposed Editorial Change: Removed ""accessible for women and children"" "

#	Indicator	Comment (English)
208	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
209	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
210	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
211	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
212	2.4.1	Some comments on indicator 2.4.1: (1) What is the complaint handling mechanism that is gender and child sensitive? This needs explanation because there are opportunities for multiple interpretations, especially between the UoC and the Certification Body, (2) In Indonesia, children are still the responsibility of their parents so they have not yet been established as independent persons. Therefore, how to make this procedure accessible to children? (3) Complaint handling is something dynamic and the timetable for completion cannot be estimated, so it is irrelevant to determine the timetable for handling complaints at each stage.
213	2.4.1	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of Affected parties and employees Proposal for Editorial Change 2: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive)) and can be accessed by related parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders."
214	2.4.1	Input editorial change: "Operate legally and respect human rights"
215	2.4.2	2.4.2 The UoC shall socialise the procedures related to the Grievance Mechanism - which timeframe?
216	2.4.2	Added except in the context of law enforcement because of crime.

#	Indicator	Comment (English)
217	2.4.2	Proposed Changes : The Certification Unit must socialize procedures related to the Grievance and Complaint Handling Mechanism to the community, planters, workers, workers' representatives, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of workforce, activities, suppliers and labor recruiters in a language they understand and use, including those who are illiterate and vulnerable groups. Provision of assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism"
218	2.4.2	Added except in the context of law enforcement because of crime.
219	2.4.2	The proposed indicator is added with a sentence: However, legal action can be used in the context of law enforcement because of a criminal/unlawful act.
220	2.4.2	Added except in the context of law enforcement because of crime.
221	2.4.2	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected parties and employees. , representatives of workers, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, labor suppliers and recruiters in languages they understand and use, including illiterate people and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism
222	2.4.2	Added except in the context of law enforcement because of crime.
223	2.4.2	Added except in the context of law enforcement because of crime.
224	2.4.2	
225	2.4.2	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected parties and employees. , representatives of workers, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, labor suppliers and recruiters in languages they understand and use, including illiterate people and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism
226	2.4.2	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected parties and employees. , representatives of workers, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, labor suppliers and recruiters in languages they understand and use, including illiterate people and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism
227	2.4.2	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected parties and employees. , representatives of workers, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, labor suppliers and recruiters in languages they understand and use, including illiterate people and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism

#	Indicator	Comment (English)
228	2.4.2	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected parties and employees. , representatives of workers, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, labor suppliers and recruiters in languages they understand and use, including illiterate people and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism
229	2.4.2	Added except in the context of law enforcement because of crime.
230	2.4.2	Added except in the context of law enforcement because of crime.
231	2.4.2	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of the affected Parties and employees planters, workers, workers' representatives, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, suppliers and labor recruiters in the language they understand and use, including illiterate people and vulnerable groups. Provision of assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism"
232	2.4.2	Added except in the context of law enforcement because of crime.
233	2.4.2	Added except in the context of law enforcement because of crime.
234	2.4.2	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected Parties and employees accessed by related parties, including the community, planters, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
235	2.4.2	Added except in the context of law enforcement because of crime.
236	2.4.2	Added except in the context of law enforcement because of crime.
237	2.4.2	Added except in the context of law enforcement because of crime.
238	2.4.2	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of the affected Parties and employees planters, workers, workers' representatives, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, suppliers and labor recruiters in the language they understand and use, including illiterate people and vulnerable groups. Provision of assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism"
239	2.4.2	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of the affected Parties and employees planters, workers, workers' representatives, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, suppliers and labor recruiters in the language they understand and use, including illiterate people and vulnerable groups. Provision of assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism"

#	Indicator	Comment (English)
240	2.4.2	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of the affected Parties and employees planters, workers, workers' representatives, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, suppliers and labor recruiters in the language they understand and use, including illiterate people and vulnerable groups. Provision of assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism"
241	2.4.2	Added except in the context of law enforcement because of crime.
242	2.4.2	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of the affected Parties and employees planters, workers, workers' representatives, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, suppliers and labor recruiters in the language they understand and use, including illiterate people and vulnerable groups. Provision of assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism"
243	2.4.2	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of the affected Parties and employees planters, workers, workers' representatives, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, suppliers and labor recruiters in the language they understand and use, including illiterate people and vulnerable groups. Provision of assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism"
244	2.4.2	Added except in the context of law enforcement because of crime.
245	2.4.2	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of the affected Parties and employees planters, workers, workers' representatives, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, suppliers and labor recruiters in the language they understand and use, including illiterate people and vulnerable groups. Provision of assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism"
246	2.4.2	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of the affected Parties and employees planters, workers, workers' representatives, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, suppliers and labor recruiters in the language they understand and use, including illiterate people and vulnerable groups. Provision of assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism"
247	2.4.2	Added except in the context of law enforcement because of crime.
248	2.4.2	Added except in the context of law enforcement because of crime.
249	2.4.2	Added except in the context of law enforcement because of crime.
250	2.4.2	Need to be checked by HR

#	Indicator	Comment (English)
251	2.4.3	For all 3 indicators columns for line 2.4.3 : IOM proposes the following practical steps for an effective remediation programme: Step 0: Building trust Step 1: Submitting and receiving the grievance Step 2: Verifying the grievance Step 3: Investigating the grievance and determining response Step 4: Redressing the grievance (Design remediation action plan) Step 5: Implementing and monitoring the remediation Step 6: Closing the incident Step 7: Incorporating feedback and evaluating results For more details, please see: IOM's Operational guidelines for Businesses on Remediation of Migrant-worker Grievances for more detailed guidelines here: https://publications.iom.int/books/operational-guidelines-businesses-remediation-migrant-worker-grievances
252	2.4.3	Text needs to be clarified; suggested text: The Certification Unit keeps complainants and relevant communities/workers/smallholders informed about the progress of the complaint filed. The result will be made available and communicated.
253	2.5	Guidance on “indirectly” could be useful. It was notably specified in the previous criteria 4.1, the use of mercenaries and paramilitaries.
254	2.5	Can this indicator be included in Principle 4 for community and Principle 6 for labour rights to eliminate repetition?
255	2.5	Human rights defenders are not necessarily workers or community members, so I am not sure this will fit into Principle 4 or 6
256	2.5	We welcome the addition with new criteria
257	2.5	Added except in the context of law enforcement because of crime.
258	2.5.1	2.5.1 This policy shall be made available and socialized – what timeframe?
259	2.5.1	Does intimidation and harassment not already specify that all kinds of violence are not allowed, therefore there is no need to narrate what are anyway penal and criminal cases (killing, disappearance, torture, ...)
260	2.5.1	Need to be checked by HR
261	2.5.1	Editorial changes to indicator 2.4.1 "accessible for women and children" to be removed because women and children are already part of the affected parties or related stakeholders.
262	2.5.2	There will be cases where legal action will be necessary if a HRD commits a criminal act. In these cases they should not have immunity due to their status as a HRD, and the issue will be dealt by local authorities
263	2.5.2	Legal Action with police support can use for Criminal activity that threatening company and other employee
264	2.5.2	Exceptions can be added in the context of law enforcement because of a crime.

#	Indicator	Comment (English)
265	2.5.2	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children are already part of the affected Parties Proposal for Editorial Change 2: The Certification Unit must disseminate procedures related to the Grievance and Complaint Handling Mechanism to the community, planters, workers, workers' representatives , women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, suppliers and recruiters of labor in languages they understand and use, including illiterate people and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism
266	2.5.2	Suggestion: The indicator is added with the sentence "except in the context of law enforcement because of criminal/unlawful acts".
267	2.5.2	Indicator 2.4.2 Proposal 1: Editorial changes to indicator 2.4.1 "accessible for women and children" to be removed because women and children are already part of the affected parties or related stakeholders. Proposal 2: Changing Indicators to: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive) and accessible to relevant parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
268	2.5.2	Proposal for Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of the affected parties and employees. , workers, workers' representatives, women and children (if necessary/if possible), other relevant stakeholders, as well as all levels of labour, activities, labor suppliers and recruiters with languages they understand and use, including illiterate people and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism
269	2.5.2	Added except in the context of law enforcement because of crime.
270	2.5.2	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected parties and employees. , representatives of workers, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, labor suppliers and recruiters in languages they understand and use, including illiterate people and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism
271	2.5.2	Added except in the context of law enforcement because of crime.
272	2.5.2	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected parties and employees. , representatives of workers, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, labor suppliers and recruiters in languages they understand and use, including illiterate people and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism

#	Indicator	Comment (English)
273	2.5.2	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected parties and employees. , representatives of workers, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, labor suppliers and recruiters in languages they understand and use, including illiterate people and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism
274	2.5.2	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected parties and employees. , representatives of workers, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, labor suppliers and recruiters in languages they understand and use, including illiterate people and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism
275	2.5.2	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected parties and employees. , representatives of workers, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, labor suppliers and recruiters in languages they understand and use, including illiterate people and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism
276	2.5.2	Added except in the context of law enforcement because of crime.
277	2.5.2	Added except in the context of law enforcement because of crime.
278	2.5.2	Added except in the context of law enforcement because of crime.
279	2.5.2	Comments on indicator 2.4.2: In Indonesia, children are still the responsibility of their parents, so they are not yet established as independent individuals. Therefore, it is sufficient to socialize complaint handling to parents
280	2.5.2	Added except in the context of law enforcement because of crime.
281	2.5.2	The Certification Unit must establish and implement a Grievance Redress Mechanism (which is gender and child sensitive) and accessible to relevant parties, including the community, smallholders, workers, their representatives, women and children (if possible/needed), as well as other relevant stakeholders.
282	2.5.2	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected parties and employees. , representatives of workers, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, labor suppliers and recruiters in languages they understand and use, including illiterate people and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism
283	2.5.2	Added except in the context of law enforcement because of crime.
284	2.5.2	Proposal: Indicator 2.5.2. added the sentence "except in the context of law enforcement in accordance with applicable rules and regulations, among others committing a violation of the law".

#	Indicator	Comment (English)
285	2.5.2	Proposed Editorial Change: Removed for women and children because women and children have become part of the employees
286	2.5.2	Proposal 1: Editorial changes to indicator 2.4.1 "accessible for women and children" to be removed because women and children are already part of the affected parties or related stakeholders. Proposal 2: Changing Indicators to: The Certification Unit must establish and implement a Grievance Handling Mechanism (which is gender and child sensitive) and accessible to relevant parties, including the community, smallholders, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
287	2.5.2	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of the affected Parties and employees planters, workers, workers' representatives, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, suppliers and labor recruiters in the language they understand and use, including illiterate people and vulnerable groups. Provision of assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism"
288	2.5.2	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of the affected Parties and employees planters, workers, workers' representatives, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, suppliers and labor recruiters in the language they understand and use, including illiterate people and vulnerable groups. Provision of assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism"
289	2.5.2	Added except in the context of law enforcement because of crime.
290	2.5.2	Added except in the context of law enforcement because of crime.
291	2.5.2	Comments on this indicator: With respect for equality before the law, any legal efforts by the UoC made to respond to an alleged unlawful act by a person should not be seen as a form of intimidation
292	2.5.2	"Proposed Editorial Change 1: Removed ""accessible for women and children"" because women and children have become part of the affected Parties and employees planters, workers, workers' representatives, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, suppliers and labor recruiters in the language they understand and use, including illiterate people and vulnerable groups. Provision of assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism"
293	2.5.2	Added except in the context of law enforcement because of crime.
294	2.5.2	Children are still the responsibility of their parents and there is no child labour. So that the socialization proposal for children is abolished, enough for the parents who are the affected parties.

#	Indicator	Comment (English)
295	2.5.2	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected parties and employees. , representatives of workers, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, labor suppliers and recruiters in languages they understand and use, including illiterate people and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism
296	2.5.2	Added except in the context of law enforcement because of crime.
297	2.5.2	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected parties and employees. , representatives of workers, women and children (if needed/if possible), other relevant stakeholders, as well as all levels of labour, activities, labor suppliers and recruiters in languages they understand and use, including illiterate people and vulnerable groups. Providing assistance to related parties who face obstacles in accessing the Grievance and Complaint Handling Mechanism
298	2.5.2	Added except in the context of law enforcement because of crime.
299	2.5.2	Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
300	2.5.2	Added except in the context of law enforcement because of crime.

#	Indicator	Comment (English)
301	2.5.2	<p>1) There needs to be clarification regarding the timeframe of the grievance mechanism or grievances</p> <p>2) Improved navigation of the progress of grievances or grievances</p> <p>3) Published on the website of the certification unit</p> <p>4) There are guidance notes for criterion 2.4: Criteria for grievance handling mechanisms need to refer to principle 31</p> <p>UNGPs: "For ensure the effectiveness of non-judicial mechanisms, non-judicial grievance mechanisms, both State-based and non-State-based must:</p> <p>a) Legitimate: earn the trust of the target group of stakeholders, and be responsible for providing fair behavior to the grievance process;</p> <p>b) Accessibility: known to exist by all intended stakeholder groups, and providing sufficient assistance to those who face special barriers to access; Specific barriers to access may include a lack of knowledge of mechanisms, language, literacy, cost, location, and fear of reprisal.</p> <p>c) Predictability: provides a clear and known procedure with a specific timeframe for each stage, and clarity on the types of processes and outputs available and ways to monitor their implementation:</p> <p>d) Equity: ensures that the aggrieved party has sufficient access for the sources of information, advice, and expertise needed to engage in a complaints process in a fair, informed and respected manner;</p> <p>e) Transparent: keeps complainants informed about the progress of their complaint, and provides sufficient information about the mechanism's performance to build confidence in its effectiveness and serve the public interest in question;</p> <p>f) Rights-compatible: ensuring that outcomes and remedies comply with internationally recognized human rights;</p> <p>g) Resources for learning processes: use relevant efforts to identify lessons learned for improving mechanisms and preventing future losses and violations; Operational level mechanisms should also: a) Be based on engagement and dialogue: consult the target group of stakeholders on performance and design, and focus on dialogue as a means of addressing and resolving complaints;</p>
302	2.5.2	2.5.2 How can you act in situations in which violence is used, violation of other rights such as freedom of movement, invasion of private property, among others, by Human Rights Defenders towards the certification unit?
303	2.5.2	This can lead to a conflict of interpretation and action with immunity for some human rights defenders in case of committing any breach of law against the UdC
304	2.5.2	2.5.2 specify and define within the indicator, how the UdC can act in situations in which violence is used, violation of other rights such as freedom of movement, invasion of private property, among others, by Human Rights Defenders towards the UdC .

#	Indicator	Comment (English)
1	3	FONAP task force: the definition section is incomplete. BMP, ASA 1 and ASA 2, ERP, ERT, FFB, ICS, ISH, mill, plant refinery, deforestation, degradation, conversion, and UoC = Unit of Certification need to be defined and should be listed consistently (with abbreviations) in the Terms and Definitions section, amongst other terms.
2	3	Legislation in Indonesia has not yet regulated the classification of a middle grower who manages an area of less than 500 hectares. This will have implications for efforts to intervene in the preparation of national interpretations. The application of the same standards for each category (unit) even though the conditions and problems faced are different. Therefore, there needs to be different indicators to respond to these differences.
3	3.1.1	FONAP task force: A business or management plan (FOR A minimum PERIOD OF three years) shall be documented AND ITS IMPLEMENTATION MONITORED...(the indicators need to be consistent with the criterion which states "implementation".
4	3.1.1	FONAP task force: A business or management plan (FOR A minimum PERIOD OF three years) shall be documented AND ITS IMPLEMENTATION MONITORED...(the indicators need to be consistent with the criterion which states "implementation".
5	3.1.1	FONAP task force: A business or management plan (FOR A minimum PERIOD OF three years) shall be documented AND ITS IMPLEMENTATION MONITORED...(the indicators need to be consistent with the criterion which states "implementation".
6	3.1.2	How does this expectation applies 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.
7	3.1.2	FONAP task force: with the goal of demonstrating implementation and progress.
8	3.1.2	FONAP task force: with the goal of demonstrating implementation and progress.
9	3.1.2	FONAP task force: with the goal of demonstrating implementation and progress.
10	3.1.3	FONAP task force: The Unit of Certification holds management reviews OF THE BUSINESS OR MANAGEMENT PLAN...
11	3.1.3	FONAP task force: The Unit of Certification holds management reviews OF THE BUSINESS OR MANAGEMENT PLAN...
12	3.1.3	FONAP task force: The Unit of Certification holds management reviews OF THE BUSINESS OR MANAGEMENT PLAN...
13	3.1.3	The phrase "highest management" is omitted. Because management review is intended for management to carry out periodic reviews of OuC performance, management will definitely attend
14	3.1.3	Proposal : The word Top Management is revised to become Top Management..as in the terms of ISO 9001 or ISO 14001. This is to be adjusted to the top leadership at the existing organizational level.
15	3.2	Define 'regularly' to make it clear.
16	3.2.1	main social and environmental are hard to define, please simplify only social and environmental
17	3.2.1	FONAP task force: this indicator is not consistent with the contents of the criterion. The Unit of Certification shall have an internal monitoring system for economic, social and environmental performance based on the respective action plan and embedding the RSPO metric template.

#	Indicator	Comment (English)
18	3.2.1	FONAP task force: this indicator is not consistent with the contents of the criterion. The Unit of Certification shall have an internal monitoring system for economic, social and environmental performance based on the respective action plan and embedding the RSPO metric template.
19	3.2.1	FONAP task force: this indicator is not consistent with the contents of the criterion. The Unit of Certification shall have an internal monitoring system for economic, social and environmental performance based on the respective action plan and embedding the RSPO metric template.
20	3.2.1	Adding human rights (HAM) elements, including the gender dimension as part of the main social and environmental opportunity impact considerations carried out by the unit of certification
21	3.2.2	Agreed
22	3.2.2	RSPO should clarify what intend to achieve with this indicator and the procedure. The company's responsibility to report its indicators in the corresponding reports remains.
23	3.2.2	RSPO to decide what is the key objective of the template. Is it necessary to be incorporated in the respective indicators as the existing template is redundant if we compare with the pre-audit information from CB?
24	3.2.2	The Metric template you made to consider production and sales records of the previous years as this will help to balance the record
25	3.2.2	Suggestion: Remove indicators because continuous improvement does not necessarily involve budgeting in monetary terms
26	3.2.2	Suggestion: Remove indicators because continuous improvement does not necessarily involve budgeting in monetary terms.
27	3.2.2	Suggestion: Remove indicators because continuous improvement does not necessarily involve budgeting in monetary terms
28	3.2.2	Removing indicators for continuous improvement does not necessarily involve budgeting in monetary terms.
29	3.2.2	Suggestion: Remove indicators because continuous improvement does not necessarily involve budgeting in monetary terms.
30	3.2.2	Suggestion: Remove indicators because continuous improvement does not necessarily involve budgeting in monetary terms.
31	3.2.2	Indicator 3.2.2 Proposal: Agree if the indicator regarding Template Metrics is removed.
32	3.2.2	Suggestion: Agree if the indicator regarding Template Metrics is removed.
33	3.2.2	Suggestion: Remove indicators because continuous improvement does not necessarily involve budgeting in monetary terms.
34	3.2.2	Will this be a new template format or will the current one that is presented to the certifying body for palmtrace license approval continue to be used?
35	3.2.2	3.2.2 Specify within the note, if it is necessary to present the metrics form to the RSPO secretariat annually and define what is the scope or end point of the continuous improvement plans for the certification unit taking into account other standards where the parameters or scopes are dynamic.
36	3.3.2	shouls say "a mechanism to"

#	Indicator	Comment (English)
37	3.3.2	FONAP task force: A key implementation mechanism for SOP should be training of the personnel of the Unit of Certification and be spelled out like this.
38	3.3.2	FONAP task force: A key implementation mechanism for SOP should be training of the personnel of the Unit of Certification and be spelled out like this.
39	3.3.2	FONAP task force: A key implementation mechanism for SOP should be training of the personnel of the Unit of Certification and be spelled out like this.
40	3.3.3	implementation
41	3.3.3	Forms of action to ensure the implementation of SOP, need to be given sanctions as a form of enforcement of norms.
42	3.4.1	*The Unit of Certification shall have regularly assessed and updated training programmes... *taking into account the trainees' gender, language, literacy, disability and other factors.
43	3.4.1	do you mean? including assessment of training results/outcomes.
44	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
45	3.4.1	FONAP task force: most importantly the objective of the training program should be TRANSFORMATION of tasks and practices.
46	3.4.1	For all 3 indicators columns for line 3.4.1 C: IOM proposes than any training for workers be in a form and language they understand.
47	3.4.1	FONAP task force: most importantly the objective of the training program should be TRANSFORMATION of tasks and practices.
48	3.4.1	Smallholders will be incapable or sustaining a training program for all workers. The requirement could be that all workers in the plantation had been trained in the RSPO ISH standard.
49	3.4.1	FONAP task force: most importantly the objective of the training program should be TRANSFORMATION of tasks and practices.
50	3.4.1	Taking into account gender specific needs needs to be elaborated further, for example identifying access to land tenure, the multiple roles of women in the supply chain, barriers to women participating in decision making, identification of jobs that endanger women's reproductive health from exposure to hazardous materials, etc
51	3.4.2	FONAP task force: delete: ...where appropriate on an individual basis (doesn't add value).
52	3.4.2	FONAP task force: delete: ...where appropriate on an individual basis (doesn't add value).
53	3.4.2	FONAP task force: delete: ...where appropriate on an individual basis (doesn't add value).
54	3.4.3	should this not be in the supply chain section?

#	Indicator	Comment (English)
55	3.4.3	SCCS to SCC
56	3.4.3	FONAP task force: substitute the vague and empty term "appropriate" by effective training for personnel to assure the correct performance of their tasks, critical...
57	3.4.3	FONAP task force: substitute the vague and empty term "appropriate" by effective training for personnel to assure the correct performance of their tasks, critical...
58	3.4.3	Smallholders should demonstrate capacity in the management of the SCC standard to be able to register their trading
59	3.5	sustained
60	3.5	It is recommended to return this criterion 3.5 to principle 7 which is more relevant in the PLANET field
61	3.5.1	Based on published add-on criteria of the German Forum for Sustainable Palm Oil (FONAP) e.V. (https://www.forumpalmoel.org/imglib/downloads/Vereinsdokumente/FONAP%20Additional%20Criteria): New wording of 3.5.1: Good Agricultural Practices, relevant to the Unit of Certification, to manage soil fertility to optimise yield and minimise environmental impacts while increasing agrobiodiversity within plantations shall be documented, implemented, and monitored.
62	3.5.1	FONAP task force: this indicator is too general and is a mix of elements (fertilization versus no impacts). The indicator should be about "soil conservation practices, that maintains or enhances, the soils structure, function, organic contents and fertility".
63	3.5.1	FONAP task force: this indicator is too general and is a mix of elements (fertilization versus no impacts). The indicator should be about "soil conservation practices, that maintains or enhances, the soils structure, function, organic contents and fertility".
64	3.5.1	FONAP task force: this indicator is too general and is a mix of elements (fertilization versus no impacts). The indicator should be about "soil conservation practices, that maintains or enhances, the soils structure, function, organic contents and fertility".
65	3.5.1	FONAP task force: this indicator is too general and is a mix of elements (fertilization versus no impacts). The indicator should be about "soil conservation practices, that maintains or enhances, the soils structure, function, organic contents and fertility".
66	3.5.1	It is necessary to insert words or terms that can be used as indicators that can show efforts to maintain or increase fertility
67	3.5.2	Annual Leaf or Tissue Analysis is okay. However, Soil sampling should be once off process before any planting including new planting. This is because whenever there are deficiencies in the soil, it always shows in the leave analysis.
68	3.5.2	It is recommended to write the word "periodical" for taking soil test samples to replace the words "every 5 years and/or before replanting". Because the leaf test is more important for estimating soil fertility in the short term, while the results of the soil test are still quite valid for the long term.
69	3.5.4	Rewrite to: For the Certification Unit, a plan for the optimal use of the fertilizer input will be developed, implemented, and monitored.

#	Indicator	Comment (English)
70	3.5.4	FONAP task force: NEW WORDING: The Unit of Certification shall implement a fertilization plan based on the nutrient requirements of the oil palm and the soil analysis.
71	3.5.4	FONAP task force: NEW WORDING: The Unit of Certification shall implement a fertilization plan based on the nutrient requirements of the oil palm and the soil analysis.
72	3.5.4	FONAP task force: NEW WORDING: The Unit of Certification shall implement a fertilization plan based on the nutrient requirements of the oil palm and the soil analysis.
73	3.6.1	Add "identity preserved mill" to the definitions
74	3.6.1	How is this going to be audited? or should this be on the guidance or at the beginning of the document as the main text?
75	3.6.1	FONAP task force: Shall include conversion factors and formula. It should not be allowed to mix certified and uncertified FFB, since it compromises no-deforestation and human/labor rights commitments. As currently phrased, this indicator will be incompatible with the new EU legislation on no-deforestation and will make RSPO an obsolete certification system for palm oil export to Europe. The last phrase contradicts the contents of the rest of the indicator. Please, review.
76	3.6.1	1) The IP approach should function as a social audit to ensure the traceability of certified FFB so that it is not mixed with non-certified FFB. 2) RSPO needs to encourage PKS that still apply mass balance to be upgraded to IP
77	3.6.1	1) Efforts to ensure that the IP approach can be used as an instrument to filter and select non-certified FFB and guarantee the use of the same standardization. While the facts on the ground show that many companies still use mass balance/MB 2) The application of MB has the potential to be used to wash non-certified palm oil
78	3.6.2	Add "mass balance mill" to definitions
79	3.6.2	How is this going to be audited? or should this be on the guidance or at the beginning of the document as the main text?
80	3.6.2	FONAP task force: As currently phrased, this indicator will be incompatible with the new EU legislation on no-deforestation and will make RSPO an obsolete certification system for palm oil export to Europe. Traceability of certified oil is lost under this MB module and uncertified oil from deforestation sources might be within the percentage of declared certified oil. This might be only acceptable for derivatives.
81	3.6.2	A criteria should be added, applicable to mills only, to require a minimum uptake of volumes from from certified growers and smallholders - unless the mill capacity is fully covered by owned/plasma certified plantations - (e.g. calculated over a full year), which should increase every year. The same should later be added at refinery, trader and processor level in the Supply Chain Standard revision.

#	Indicator	Comment (English)
82	3.6.3	The UC should provide the estimated tonnage supported by the plantation area, the harvesting records, the lab results, and other documents that prove the production, and the mill should provide support with records of the tonnage received, the lab results of the extraction ratio and the mass balance on the mill.
83	3.6.3	FONAP task force: this indicator is misplaced. It is not an indicator for Units of Certification, but rather a Certification Body requirement!!!
84	3.6.3	This indicator is meant for CB, hence not supposed to be included here. It is supposed to be in System Document. This indicator shall be re-write for CH compliances.
85	3.6.4	FONAP task force: new proposed wording: The mill shall also meet all registration and reporting requirements for the appropriate the supply chain under its authorized certification scope through the RSPO IT platform.
86	3.6.5	FONAP task force: the wording should be simplified and shortened to facilitate the implementation of this indicator
87	3.6.6	This indicator can be taken out from 3.6. It should be part of 3.1 or 3.2.
88	3.6.6	The internal audit should not be limited to the SCC requirements but should cover all aspects of the P&C certification and be a condition precedent to any CB audit.
89	3.6.6	Internal Audit should also be applicable to medium growers.
90	3.6.6	A simplified internal audit/checklist should be applicable to small growers
91	3.6.7	3.6.7 Purchasing and Goods in: RSPO MB study (link between 2.3 and 3.6.7 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 3.6.7 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 require 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 3.6.7. Between these two indicators, this could easily be explicitly linked, if the purchasing data to be collected for 3.6.7 required the inclusion of the geolocation & legality of supplier's information as required according to 2.3. If for instance, each supplier has a unique ID in the mill's system under which all data points are gathered, this connection could easily be made, facilitating geolocation and legality of supplier's information on supplied non-certified volumes. > Need to link the purchasing data in 3.6.7 (traded volumes) with the data gathered in 2.3.
92	3.6.7	The mill should also inform the CB if a decrease in production is detected to avoid false claims.
93	3.6.7	FONAP task force: the only permitted mechanism for handling of nonconforming FFB should be segregation (identity preservation). Overproduction should not be allowed. As currently phrased, this indicator will be incompatible with the new EU legislation on no-deforestation and will make RSPO an obsolete certification system for palm oil export to Europe.
94	3.6.8	FONAP task force: the indicator should be upgraded to C Critical

#	Indicator	Comment (English)
95	3.6.9	Text does not make any sense
96	3.6.9	missing information
97	3.6.9	FONAP task force: inconsistent wording. Rather consider: The mill shall only outsource its milling activities to independent third parties, if it ensures that the independent party complies with...
98	3.6.9	3.6.9 and 3.6.12 (the Indonesian version of the editorial is not complete)
99	3.6.9	The application of the phrase "do not allow outsourcing of activities" needs to be further elaborated to prevent outsourcing, including sanctions so that mills comply with the RSPO P&C
100	3.6.10	This indicator we believe corresponds to 3.8.11 of the P&C 2018. This indicator has never lead to an NC according to ASI database.
101	3.6.10	Text does not make any sense
102	3.6.10	Text does not make any sense
103	3.6.10	Missing text: conduct of its next audit of the names and contacts details of any new contractor used for the physical handling of RSPO certified oil palm products.
104	3.6.10	FONAP task force: the indicator should be upgraded to C Critical
105	3.6.11	FONAP task force: the indicator should be upgraded to C Critical
106	3.6.12	FONAP task force: the indicator should be upgraded to C Critical
107	3.6.12	Text does not make any sense
108	3.6.13	FONAP task force: the indicator should be upgraded to C Critical
109	3.6.13	It does not read as a requirement and more as a definition. OER should be defined in the right section.
110	3.6.13	The extraction rate should be demonstrated using the daily log of the Mill through the lab analysis of the OER using the mass balance of the mill based on past records.
111	3.6.14	FONAP task force: the indicator should be upgraded to C Critical
112	3.6.14	According to the ASI database, this indicator corresponds to 3.8.14 of the 2018 P&C and has never led to an NC.
113	3.6.15	FONAP task force task force: the indicator should be upgraded to C Critical
114	3.6.15	What does it means by to strive for 100% separation? Is there any allowance to get mixed? Should it be read as to ensure 100% separation?
115	3.6.15	For Identity Preserved Module, the mill shall assure with onsite verification and through documented procedures and record keeping that the RSPO certified oil palm product is kept physically separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.
116	3.6.16	FONAP task force task force: the indicator should be upgraded to C Critical

#	Indicator	Comment (English)
117	3.6.17	FONAP task force task force task force: the indicator should be upgraded to C Critical

#	Indicator	Comment (English)
1	4	FONAP task force: the definition section is incomplete. BMP, ASA 1 and ASA 2, ERP, ERT, FFB, ICS, ISH, mill, plant refinery, deforestation, degradation, conversion, and UoC = Unit of Certification need to be defined and should be listed consistently (with abbreviations) in the Terms and Definitions section, amongst other terms.
2	4.1	HRSS - Proposed wordings: The Unit of Certification respects the human rights of Communities. Propose to remove stakeholders as it is difficult to measure and audit compliance. The scope of applicability of the term stakeholder as it has been newly defined makes it difficult to audit.
3	4.1	What about The UOC respects the human rights of affected communities and stakeholders
4	4.1	Proposal: part e is amended to become transitional provisions for monitoring, renegotiating, updating, and terminating agreements in accordance with Applicable Regulations
5	4.1.1	FONAP task force: the policy should be developed in a participatory way with community/stakeholder representatives. This is the only way to make the policy legitimate and credible. Furthermore, a policy alone runs the risk to contain the sufficient detail to enforce it with impact. That is why it should be accompanied by a detailed action plan.
6	4.1.1	For all 3 indicators columns in line 4.1.1 C - To consider aligning this with the IRIS Standard:General Principle A: Respect for laws, fundamental principles and rights at work General Principle B: Respect for Ethical and Professional Conduct Principle 1: Prohibition of recruitment fees and related costs to migrant workers Principle 2: Respect for freedom of movement Principle 3: Respect for transparency of terms and conditions of employment Principle 4: Respect for confidentiality and data protection Principle 5: Respect for access to remedy https://iris.iom.int/iris-standard
7	4.1.1	For the Mill: The policy should be made available to all stakeholders

#	Indicator	Comment (English)
8	4.1.1	HRSS - Proposed rewording: A policy to respect the human rights of Communities shall be established and implemented by the Unit of Certification and its contracted services (including hired private military and security companies). This policy shall include the prohibition of: a) retaliation b) intimidation & harassment (including threats) c) violence (physical, sexual, and gender-based) d) exploitation e) discrimination - (including access to employment, education, training) This policy shall be made available and socialised to all levels of the workforce and operations in a language understood or spoken by them.
9	4.1.1	HRSS - Propose to remove word 'and stakeholders' and 'against Communities' in first paragraph. Propose to include the word 'including' in e). Propose to italicise 'intimidation and harassment (including threats)' as this are defined terms. Propose to include definition of 'exploitation' and to italicise when defined.
10	4.1.1	What about human rights of affected Communities and stakeholders
11	4.1.1	This policy must be published and made available to all affected communities and workers in their chosen language/s. The policy must be aligned with international human rights norms. It must say that these norms will be adhered to when they are stronger/provide more protections for human rights than national law.
12	4.1.1	For the Mill: The policy should be made available to all stakeholders.
13	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
14	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
15	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
16	4.1.1	"Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI"
17	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
18	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI

#	Indicator	Comment (English)
19	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI.
20	4.1.1	Suggestion: Remove military service providers because they are not relevant to the situation in Indonesia or Indicator 4.1.1 remains as generic but will be discussed at NI – Indonesia.
21	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
22	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
23	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
24	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
25	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
26	4.1.1	Proposal: Removing military service providers Needs to be checked by HR
27	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
28	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
29	4.1.1	"Proposal: Procedural note deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate this statement under the guidelines and submit to respective national interpretations for further definition. Indicator 6.8.8 deleted /no need, because it's set in indicator 6.8.1 (6.8.8 repetition 6.8.1)."
30	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
31	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
32	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
33	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI

#	Indicator	Comment (English)
34	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
35	4.1.1	Proposal 1: Eliminate military service providers, as they are not appropriate as advice for dealing with communities. In Indonesia it is also irrelevant because there are almost no major issues related to the security of the land and surrounding communities, thus requiring military rental services, and there are also no paramilitaries that can be hired in Indonesia. It will be more relevant for countries located in Latin America and Africa.
36	4.1.1	"Proposal 1: Removing military service providers" "Proposal 2: Keeping generic but will be discussed at INA NI"
37	4.1.1	"Proposal 1: Removing military service providers" "Proposal 2: Keeping generic but will be discussed at INA NI"
38	4.1.1	"Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI"
39	4.1.1	Remove military service providers
40	4.1.1	"Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI"
41	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
42	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
43	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
44	4.1.1	Proposal: Eliminate military service providers
45	4.1.1	"Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI"
46	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
47	4.1.1	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
48	4.1.1	"Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI"
49	4.1.1	Proposal 1: Eliminate military service providers Proposal 2: Keep generic but will be discussed at INA NI

#	Indicator	Comment (English)
50	4.1.1	"Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI"
51	4.2	FPIC, as we have found with HCV5&6, will need to be considered differently at JA scale. Recommend that a 'sample' of the jurisdiction be assessed, based on risk and sensitivity analyses.
52	4.2	HRSS - Proposed to capitalise 'C' in 'communities' as it is defined.
53	4.2	<p>4.2 should be revised so FPIC requirements apply to new AND EXISTING operations and to ensure RSPO members adhere to the best practices in international human rights norms and the High Carbon Stock Approach Social Requirements and Implementation Guidance.</p> <p>https://highcarbonstock.org/the-hcs-approach-toolkit/ https://highcarbonstock.org/wp-content/uploads/2020/08/HCSA-Social-Requirements-Apr-2020.pdf https://highcarbonstock.org/wp-content/uploads/2022/12/HCSA-Implementation-Guide-with-Appendices-2020.pdf</p> <p>The RSPO is failing to ensure its members adhere to these best practices. See RAN's report on an evaluation of FPIC policies and SOPs of RSPO members here https://www.ran.org/publications/fpicevaluation/</p> <p>The RSPO should require its members to improve their FPIC policies, SOPs and adhere to the HCSA toolkit in its entirety—including its requirements on FPIC in new AND EXISTING concessions (SR 13). Integration of HCV, HCS and FPIC is critical https://highcarbonstock.org/wp-content/uploads/2018/06/Def-HCSA-Module-3-21_06_2018_Web.pdf</p> <p>The RSPO and HCSA should work together to ensure the best practices on FPIC and social requirements in the P & C and HCSA are adhered to across the palm oil sector.</p> <p>The RSPO can encourage its members to review the https://highcarbonstock.org/sr-training-material/ , advice notes (especially number 2 on Requirement for preparation phase Social Requirements to be met to obtain a satisfactory evaluation outcome for HCV-HCSA assessment reports) and use the HCSA's social requirements help line https://highcarbonstock.org/wp-content/uploads/2022/12/Advice-Note-02-HCV-HCSA-Assessments.pdf</p> <p>All advice notes are available on the HCSA toolkit page https://highcarbonstock.org/the-hcs-approach-toolkit/</p>
54	4.2	Still can't distinguish the purpose of criteria 4.2 and 4.4. It looks like it regulates the same thing i.e. implementation of FPIC. It is recommended to combine these 2 criteria
55	4.2	Suggestion: Remove military service providers because they are not relevant to the situation in Indonesia or Indicator 4.1.1 remains as generic but will be discussed at NI – Indonesia.

#	Indicator	Comment (English)
56	4.2.1	HRSS - Proposed rewording: As part of the Free, Prior and Informed Consent (FPIC) process, the following documents shall be available: - history of land tenure - legal ownership, lease, or use of customary land authorised by customary landowners Reason: For clarity.
57	4.2.1	Sometimes, the smallholder does not have documentation to prove ownership, and an FPIC process is too complicated at this level.
58	4.2.1	FONAP task force: please, use a verb in the first phrase. This is about legitimate land use rights and FPIC is one of the means to demonstrate it, but there are other options that can show the absence of dispute about land.
59	4.2.2	Should be upgraded to a critical indicator C
60	4.2.2	HRSS - Proposed rewording: Directly affected Communities (including Vulnerable groups), shall be represented through institutions or representatives of their own choosing. Directly affected Communities (including Vulnerable groups), shall be given the option of access to and provision of independent advice and legal counsel. Reason: To ensure that there is no encroachment on the right of Communities to elect their own representatives.
61	4.2.3	It should say: Land tenure and use assessments (including participatory mapping) shall be... Otherwise it is unclear what type of assessment is required
62	4.2.3	The RSPO should revise its indicators to align with the relevant steps of the HCSA Toolkit, especially related to the requirements for the identification of affected communities, land use and tenure studies PRIOR to HCV-HCS Assessments. The RSPO should also ensure all members adhere to the HCSA in full, including Advice Note 2 that outlines 'Requirement for preparation phase Social Requirements to be met to obtain a satisfactory evaluation outcome for HCV-HCSA assessment reports' https://highcarbonstock.org/wp-content/uploads/2022/12/Advice-Note-02-HCV-HCSA-Assessments.pdf
63	4.2.3	This is part of the NPP
64	4.2.3	should say in any proposed land clearing...
65	4.2.3	HRSS - Error in the spelling of 'proposed' and suggest to capitalise C in 'communities'.

#	Indicator	Comment (English)
66	4.2.4	SEIA and food & water security should be in separate indicator. In P&C 2013, there was a separate Criteria for EIA and SIA respectively. In P&C 2018, the requirements have been combined into 1 Criteria, with comprehensive SEIA. With this combined SEIA, we can see the dilution on the content of the documents. And now, from comprehensive SEIA, it is changed to participatory SEIA. And from 1 Criteria with few indicators, now only 1 indicator covering this topic. It looks like the requirement is become weaker from one revision to another revision. From the auditing perspective, we see that most of the CHs still not comply with this SEIA. The Social Impact Assessment and Management Plan (for example) is the main document to determine any social issues in the plantation.
67	4.2.4	It is recommended that the requirement on SEIA (or EIA and SIA separately) is a stand alone Criteria, can be part of Principle 3
68	4.2.4	may be better placed under 4.3
69	4.2.4	Compliance with the SEIA environmental management plan must be an auditable item of the P&Cs.
70	4.2.4	FONAP task force: RSPO needs to develop guidance about best and truly participatory methods in this sense.
71	4.2.5	This is from FPIC Guidance 2022, suggest referring to the Guidance instead of quoting it in an indicator.
72	4.2.5	As above, 4.2 and 4.2.5 should be revised so FPIC Implementation requirements apply to new AND EXISTING operations and to ensure RSPO members adhere to the best practices in international human rights norms and the High Carbon Stock Approach Social Requirements and Implementation Guidance. https://highcarbonstock.org/the-hcs-approach-toolkit/ https://highcarbonstock.org/wp-content/uploads/2020/08/HCSA-Social-Requirements-Apr-2020.pdf https://highcarbonstock.org/wp-content/uploads/2022/12/HCSA-Implementation-Guide-with-Appendices-2020.pdf The HCSA's Integrated Conservation and Land Use Plan Development and Implementation Guidance should be referred to as best practice guidance for agreements reached with affected communities. https://highcarbonstock.org/wp-content/uploads/2021/06/03-HCSA-ICLUP-singlepages.FinalDraft.pdf Why does this indicator only refer to what "Free" means. Why not outline the international norm requirements for FPIC and those outlined in the RSPO and HCSA's Guidance?
73	4.2.5	HRSS - For para i), to include the phrase '(including Vulnerable Groups)' after 'Communities' in the first sentence for clarity.
74	4.2.5	should refer to "identified in indicator 4.2.3" (not 4.2.4)
75	4.2.5	HRSS - Propose to italicise and capitalise 'in good faith' as this is defined. Propose to capitalise 'vulnerable groups' for the same reason.
76	4.2.5	HRSS - After iv), propose to add the following words: All communications shall be in a language understood by directly affected Communities (including Vulnerable groups). Reason: To ensure that the communication is done effectively throughout the FPIC process i.e. steps i) to iv).

#	Indicator	Comment (English)
77	4.2.5	Why does this indicator only refer to what "Free" means. Why not outline the international norm requirements for FPIC and those outlined in the RSPO and HCSA's Guidance? See RAN's other inputs in other comments.
78	4.2.5	FONAP task force: indirect or hidden pressures for community members or land owners to sign documents should be monitored through social research techniques.
79	4.2.5	Input that there is a need for a new indicator: The Unit of Certification needs to carry out Human Rights Due Diligence in accordance with Principle 17 of the UNGPs. Principle 17 "In order to identify, prevent, mitigate, and concern how companies deal with adverse human rights impacts, business companies must conduct human rights due diligence. The process should include assessing actual and potential impacts on human rights, integrating and acting on the findings, tracking feedback, and communicating how those impacts are being addressed. Human rights due diligence: Must cover adverse human rights impacts that the business enterprise has or contributes through its own activities, or that may be directly related to its operations, products, or services from its business relationship; Can vary in complexity depending on the size of the business enterprise, the severity of adverse human rights impacts, and the nature and context of its operations; Must keep going, recognizing that human rights risks may change over time as the company's operations and operational context change. For the rest, please see the comments on Principle 17.
80	4.2.5	This indicator is too detailed in explaining the desired requirements. Because these details are part of the FPIC itself, it is better if it only mentions the need for FPIC as a requirement, where the implementation must be carried out in accordance with the existing FPIC guidelines.
81	4.2.6	FONAP task force: RSPO needs to provide specific guidance, especially around the vague term "appropriate scale". 1:5000 or 1:10000 could be high-resolution scales fit for the purpose.
82	4.2.7	compensation and benefits where deemed necessary
83	4.2.7	renegotiation only limit for several point that can be renegotiate, it could not apply to final decision that agree and bond by legal agreement
84	4.2.7	FONAP task force: indirect or hidden pressures for community members or land owners to sign documents should be monitored through social research techniques.
85	4.2.7	Proposal: part e regarding "renegotiation" to be agreed upon and carried out in accordance with the applicable Regulations.
86	4.2.7	Proposal: part e is amended to become transitional provisions for monitoring, renegotiating, updating, and terminating agreements in accordance with Applicable Regulations.
87	4.2.7	At point "e" to remove the word "renegotiate". Because the results of the negotiations have been legalized by the legal aspect, they must be obeyed and must be carried out in accordance with the agreement on points a - d.
88	4.2.7	Part e is amended to become transitional provisions for monitoring, renegotiating, renewing and terminating agreements in accordance with Applicable Regulations

#	Indicator	Comment (English)
89	4.2.7	Proposal: Add "according to applicable regulations" in part e
90	4.2.7	Suggestion: Just delete the Template Metrics due to duplication with the audit report documentation prepared by the Certification Body Auditor
91	4.2.7	Proposal: Add "according to applicable regulations" in part e
92	4.2.7	Proposal: Indicator 4.2.7. point e regarding "renegotiation" so that the agreed sentence is added and carried out in accordance with the applicable National Regulations.
93	4.2.7	section e amended to be transitional provisions for monitoring, renegotiating, renewing, and terminating agreements in accordance with Applicable Regulations
94	4.2.7	Proposal: part e is amended to become transitional provisions for monitoring, renegotiating, renewing and terminating agreements in accordance with applicable regulations.
95	4.2.7	Proposal: part e is amended to become transitional provisions for monitoring, renegotiating, updating, and terminating agreements in accordance with Applicable Regulations
96	4.2.7	Proposal: part e is amended to become transitional provisions for monitoring, renegotiating, updating, and terminating agreements in accordance with Applicable Regulations
97	4.2.7	This indicator is too detailed in explaining the desired requirements. Because these details are part of the FPIC itself, it is better if it only mentions the need for FPIC as a requirement, where the implementation must be carried out in accordance with the existing FPIC guidelines.
98	4.2.7	Proposal: part e regarding "renegotiation" to be agreed upon and carried out in accordance with the applicable Regulations.
99	4.2.7	Proposal: Add "according to applicable regulations" in part e
100	4.2.7	Proposal: part e is amended to become transitional provisions for monitoring, renegotiating, updating, and terminating agreements in accordance with Applicable Regulations
101	4.2.7	In order to support the RSPO Program for Indicators to be practical, streamlined, and concise as well as easy to understand and verify..then it is better if indicator 4.2.5 is summarized more briefly. The lengthy explanation is set in the guide only. This is so that before the indicators are met and implemented, the certification unit is already confused and does not understand what this indicator means. It's not too pushy for everything to be mentioned in the indicator, but it can be arranged in a guide or guidance.
102	4.2.8	FONAP task force: this monitoring should be conducted by independent organization with good relation to community members or fund of social research techniques. First of second party monitoring activities run significant risk of biases.
103	4.2.8	HRSS - Propose to capitalise 'C' in 'communities'
104	4.3.1	FONAP task force: this research should be conducted by independent organization with good relation to community members or fund of participatory outreach techniques. First of second party monitoring activities run significant risk of biases.
105	4.3.1	This requirement should not be applicable to ISH.

#	Indicator	Comment (English)
106	4.4	4.4 could be merged with 4.2
107	4.4	HRRS - Propose rewording: FPIC shall be obtained for current operations where legal, customary and other land user rights of Communities are directly affected. Reason: To make linkage in indicator that only the monitoring of the negotiated agreement, identification of gaps in implementation and corrective action component of FPIC is applicable to current operations.
108	4.4	Proposed guidance notes removed
109	4.4.1	This is not auditable.
110	4.4.1	This should be included on the NPP and should not be registered as an indicator; besides, indicator 4.2.9 does not exist.
111	4.4.1	New Planting for what cut off?
112	4.4.1	HRSS - Proposed rewording: Indicator 4.2.8 shall apply to current operations. Reason: The monitoring of the negotiated agreement, identification of gaps in implementation and corrective action component of FPIC is applicable to current operations.
113	4.4.2	HRRS - Propose to move this up as indicator 4.2.9. Reason: This is only applicable to new plantings.
114	4.4.2	4.4.2: would be advantageous to the investor and win-win as it requires FPIC but would open RSPO to NGOs criticism of going back on 2018 standard (4.5.7)
115	4.4.2	RAN recommends the deletion of 'except in areas used for governmental program. The violation of FPIC rights under eminent domain is NOT acceptable and violations of FPIC rights should not be encouraged in any way by the RSPO in its standard
116	4.4.2	FONAP task force: shall be upgraded to a critical indicator C
117	4.4.3	HRRS - Propose to move this up as indicator 4.2.10. Reason: This is only applicable to new plantings.
118	4.4.3	This indicator corresponds to 4.5.8 of the P&C 2018. According to the ASI database, this indicator has never led to an NC
119	4.5	Still can't distinguish the purpose of criteria 4.2 and 4.4. It looks like it regulates the same thing i.e. implementation of FPIC. It is recommended to combine these 2 criteria
120	4.5	Proposed guidance notes removed
121	4.5.1	HRSS- Grammar error- "rights" instead of "right's"
122	4.5.1	HRSS - Children's rights.
123	4.5.1	HRSS - Clarity is needed on what child rights in this context means and what are some examples of the child rights that are identified and compensated i.e. if this means their rights associated with land succession or right to education etc.
124	4.5.1	FONAP task force: RSPO should issue specific guidance based on internationally accepted protocols.
125	4.5.1	Suggestion : Catalan guide can be abolished
126	4.5.1	Suggestion: removed guidance note as not significantly relevant

#	Indicator	Comment (English)
127	4.5.1	Proposed guidance notes removed
128	4.5.1	Proposed guidance notes removed
129	4.5.1	Proposed guidance notes removed
130	4.5.1	Suggestion: guidance note removed.
131	4.5.1	Proposed guidance notes removed
132	4.5.1	Suggestion: guidance note removed.
133	4.5.1	Proposed guidance notes removed
134	4.5.1	What is the meaning of this indicator statement, namely "making compensation procedures that take into account children's rights"? In Indonesia, children are not legal subjects
135	4.5.1	Suggestion: guidance note removed.
136	4.5.1	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
137	4.5.1	Need to check D&L
138	4.5.1	Proposal: part e. regarding "renegotiation" so that it is agreed and carried out in accordance with the applicable regulations.
139	4.5.2	Should be upgraded to a critical indicator C
140	4.5.2	FONAP task force: shall be upgraded to a critical indicator C
141	4.5.3	Should be upgraded to a critical indicator C
142	4.5.3	FONAP task force: shall be upgraded to a critical indicator C
143	4.5.4	Should be upgraded to a critical indicator C
144	4.5.4	FONAP task force: shall be upgraded to a critical indicator C
145	4.5.5	Should be upgraded to a critical indicator C
146	4.5.5	FONAP task force: shall be upgraded to a critical indicator C
147	4.5.5	Proposed guidance notes removed
148	4.6	RAN recommends that the conflict resolution systems are aligned with international best practice and the RSPO should include examples of best practices in the indicators.
149	4.6	Proposed guidance notes removed
150	4.6	Criterion 4.6 has many intersections with criterion 2.4, it is recommended that these two criteria be combined with all their indicators and placed in principle 4
151	4.6.1	We welcome the addition of the new criteria
152	4.6.1	The conflict resolution system (procedure) should be publicly available.
153	4.6.1	Change the Note so it refers to existing, newly acquired and new plantations.

#	Indicator	Comment (English)
154	4.6.1	directly affected communities?
155	4.6.1	Do you mean 4.5?
156	4.6.1	This definition implies that remediation is necessary, which is not always the case. Why not use for 4.6.1 the text used for "4.6: There is a conflict resolution system to resolve disputes in a practical and constructive manner." - this is more general
157	4.6.1	HRSS - Proposed wordings: A documented conflict resolution system shall be established and implemented. For compensation within the conflict resolution system, refer to Criteria 4.6. Directly affected Communities that have been dispossessed or forced to abandon their customary lands and other land user rights, shall have access to conflict resolution system Note: This applies for existing and newly acquired plantations.
158	4.6.1	HRSS - Propose to have a a definition for conflict resolution system: A system to diffuse, resolve and remediate disagreements, confrontations and tensions between the UoCs and Communities
159	4.6.1	prevention, management and resolution system?
160	4.6.4	FONAP task force: shall be upgraded to a critical indicator C
161	4.6.4	HRSS- Suggestion to Include a definition for Participatory Mapping.
162	4.6.4	FONAP task force: shall be upgraded to a critical indicator C

#	Indicator	Comment (English)
1	5.1	General comments: We question the attempt to retrofit the RISS into the overall P&C document The Smallholder strategy made it clear that a bottom up approach focusing on livelihoods is the best way forward for smallholders. The RISS was developed in that spirit.
2	5.1	FONAP task force: the definition section is incomplete. BMP, ASA 1 and ASA 2, ERP, ERT, FFB, ICS, ISH, mill, plant refinery, deforestation, degradation, conversion, and UoC = Unit of Certification need to be defined and should be listed consistently (with abbreviations) in the Terms and Definitions section, amongst other terms.
3	5.1	It is recommended to remove the words "other local businesses" from the description of criterion 5.1 because none of the indicators in criterion 5.1 address this.
4	5.1.1	Should be upgraded to a critical indicator C
5	5.1.1	FONAP task force: shall be upgraded to a critical indicator C
6	5.1.2	A reference value needs to cover the concept of Living Income (see Living Income Community of Practice).
7	5.1.2	FONAP task force: a reference value needs to cover the concept of Living Income (see Living Income Community of Practice).
8	5.1.2	What in a situation that it the Smallholder that propose new prices and the such prices are accepted. would the the unit of certification still explain such price to the SH?
9	5.1.3	A fair price should contribute to secure a Living Income for smallholders. See the methodology of the Living Income Community of Practice.

#	Indicator	Comment (English)
10	5.1.3	<p>“Fair or Competitive pricing”</p> <p>> Comment: the price should be fair, guidance should be given regarding what should be considered as fair.</p> <p>> Proposal: Procedural notes</p> <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. 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.</p> <p>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.</p> <p>Cost calculations are periodically reviewed to reflect changes in cost of living (inflation, deflation, increase of minimum wages, etc.)</p>
11	5.1.3	FONAP task force: A fair price should contribute to secure a Living Income for smallholders. See the methodology of the Living Income Community of Practice.
12	5.1.3	The UoC should not make any discounts for services provided to the smallholder. The price should be applicable to all parties and other services or sourcing of goods should be managed in a separate account. The price paid for certified FFB should be transparent to all parties.
13	5.1.3	We welcome this procedural note
14	5.1.4	FONAP task force: Delete "if requested".
15	5.1.4	Delete "if requested".
16	5.1.4	the words “Women as all parties” were omitted in the 2023 draft. They need to be reinstated.
17	5.1.5	And with mutual consent.
18	5.1.5	FONAP task force: the key word missing here is "mutual consent."
19	5.1.7	FONAP task force: shall be upgraded to a critical indicator C

#	Indicator	Comment (English)
20	5.1.7	It should say Weighing equipment of the UoC used to weigh FFB supplied by...
21	5.1.7	FONAP task force: shall be upgraded to a critical indicator C
22	5.1.8	FONAP task force: smallholders cannot bear the costs of audits. Audit costs should be covered by entities that are placed at a higher level in the supply chain.
23	5.2	In Criterion 5.2 it states that the unit of certification supports the inclusion of smallholders in the sustainable palm value chain.. etc., but in indicator 5.2.1 the 2018 P&C mentions women as part of it, but in the P&C 2023 draft indicator farmers are mentioned in general or do not explicitly mention women as part of of the parties to consult and participate
24	5.2.1	FONAP task force: the key word missing here is "participatory consultation techniques". Smallholders cannot bear the costs of audits. Audit costs should be covered by entities that are placed at a higher level in the supply chain.
25	5.2.1	interested smallholders must prove their independent status.
26	5.2.1	alternative wording stressing who is involved in the consultation: The UoC, through consultation with relevant smallholders, shall assess the support they needs towards achieving RSPO certification and improving livelihoods.
27	5.2.2	Improving livelihoods should include the promotion of living incomes for smallholders. Working towards and measuring progress towards a living income should be included as additional criterium, in line with the criterion on a decent living wage (6.3.2)
28	5.2.2	FONAP task force: Improving livelihoods should include the promotion of living incomes for smallholders. Working towards and measuring progress towards a living income should be included as additional criterium, in line with the criterion on a decent living wage (6.3.2)
29	5.2.2	shall develop and implement
30	5.2.3	FONAP task force: Audit costs should be covered by entities that are placed at a higher level in the supply chain.
31	5.2.3	it should say: shall provide
32	5.2.3	Please define "Were applicable", remove this statement and leave "The Unit of Certification shall provide support to smallholders to promote legality of FFB production."
33	5.2.3	The word "if possible" is not appropriate when juxtaposed with the word "must", it is advisable to remove the word "must"
34	5.2.4	This requirement seems to be out of place here and should be moved to the relevant pesticide section.
35	5.2.4	FONAP task force: this requirement seems to be out of place here and should be moved to the relevant pesticide section.
36	5.2.4	suggest rewording and also considering impacts The UoC has documented evidence of the capacity building on pesticide handling and management provided to their schemed smallholders (activities conducted, impact of training).

#	Indicator	Comment (English)
37	5.2.4	Pesticide handling and management is part of the process to achieve RSPO certification as mentioned in indicator 5.1.8, so indicator 5.2.4 is no longer needed
38	5.2.5	rather than publicly available, please put review and inform the reports to the selected parties. The program should be update with interested smallholders in FGD sessions only to separate the progress between cooperative.
39	5.2.5	FONAP task force: this review should ideally be conducted by a third party organization.
40	5.2.5	should say: shall regularly review and make publicly available...
41	5.2.5	Define "regularly"—change to a minimum period, year, bi-annual, quarterly, monthly, or any convenient period.

#	Indicator	Comment (English)
1	6	[Abidjan, 13 Dec 2022] Ensure consistent, clear and standardised use of term 'workers', and clearly indicate types of workers to be included in the requirements across the whole Principle 6.
2	6	While there has been a tacit understanding of what "conditions" means in this principle, perhaps it would be good to clarify further? Consider revising to: "Respect Workers' Rights and Provide Decent Working and Living Conditions." And make sure that criteria and indicators under this principle encompass relevant local, national, and international regulations on decent work (see: ILO https://www.ilo.org/global/topics/decent-work/lang--en/index.htm), consistent with Principle 2. It is also important to ensure that in the process of revision and review, none of the rights and entitlements of workers already instituted in P&C 2018 are diminished.
3	6	RAN recommends that the P & C and indicators for Workers' Rights and Conditions are not weakened in any way during this review.
4	6	FONAP task force: the definition section is incomplete. BMP, ASA 1 and ASA 2, ERP, ERT, FFB, ICS, ISH, mill, plant refinery, deforestation, degradation, conversion, and UoC = Unit of Certification need to be defined and should be listed consistently (with abbreviations) in the Terms and Definitions section, amongst other terms.
5	6	What about Medium Growers ? If any specific reason, need to be clearly expressed.
6	6.1	HRSS- Proposed wordings: All forms of discrimination are prohibited against all workers.
7	6.1	*union membership and political affiliation
8	6.1	Key actions for equal treatment and opportunity can be found in IOM's Migrant Worker Guidelines for Employers, page 22: https://publications.iom.int/books/migrant-worker-guidelines-employers
9	6.1.1	Why do you restrict the information to the workforce? This should be publicly available to all stakeholders.
10	6.1.1	It should be clearly written that P6 is applicable for all rather than stating Not Applicable for Medium Grower and Smallholders.
11	6.1.1	Why must be specifically non-discrimination and equal opportunities policy? Can auditor accept if the UoC have a Human Rights Policy covering the principles of non-discrimination and equal opportunity?
12	6.1.1	Please take cognizance that the ceiling age limit is imposed by the Government in the country where the UoC is operated in. For instance, according to the Immigration guideline of Malaysia, the ceiling age limit of migrant workers who can enter and work in Malaysia is 45 years old. Therefore we cannot recruit any migrant workers above 45 years old must not be seen as discrimination against age.
13	6.1.1	We should also consider traditional and culture of the area we are operating. because, we can not make a non-discriminatory policy that affect the law of the land
14	6.1.1	Developed in dialogue with workers and includes a complaint mechanism which is implemented

#	Indicator	Comment (English)
15	6.1.1	"FONAP task force: All the criteria mentioned here should be applicable to all units of certification, not just the big ones with >500ha, at least also to medium growers. The following is a more complete list for potentially marginalized groups: a) Race, color, sex, sexual orientation, gender, caste, religion, political opinion, national extraction or social origin; b) Nationality or migratory status; c) Civil status; d) Medical condition; e) Family condition, including pregnant women and parents with children, or any other protected status as included in applicable laws; f) Worker organization membership or being an organizer; g) Having filed complaints within the complaints or grievance mechanisms; h) Unequal opportunities for gender when appointing management positions; i) Political, religious, social, sexual or cultural opinions and convictions, views or affiliations of workers."
16	6.1.1	All the criteria mentioned here should be applicable to all units of certification, not just the ones with >500ha, at least also to medium growers. The following is a more complete list for potentially marginalized groups: a) Race, color, sex, sexual orientation, gender, caste, religion, political opinion, national extraction or social origin; b) Nationality or migratory status; c) Civil status; d) Medical condition; e) Family condition, including pregnant women and parents with children, or any other protected status as included in applicable laws; f) Worker organization membership or being an organizer; g) Having filed complaints within the complaints or grievance mechanisms; h) Unequal opportunities for gender when appointing management positions; i) Political, religious, social, sexual or cultural opinions and convictions, views or affiliations of workers
17	6.1.1	Need to check HR
18	6.1.2	FONAP task force: this is not only about biological sex (male/female), but rather should include ALL gender types! Additionally this indicator needs to be upgraded to critical C
19	6.1.2	This is not only about biological sex (male/female), but rather should include ALL gender types. Additionally this indicator needs to be upgraded to critical C

#	Indicator	Comment (English)
20	6.1.2	1) For indicator 6.1.2, there is discussion about the need for women not to be counted as single workers. Departing from reflections on the ground that usually women are calculated to have lower wages than male workers. wages for male workers. In terms of compliance with these guidelines, there may be no government rules or regulations at the local or national level. However, the RSPO needs to ensure that the fulfillment of women's rights including the fulfillment of the wage structure of women workers must be met equally in terms of she can prove that she is the main worker”
21	6.1.2	The sentence "based on the quality of their work" should be added to "based on the quality of their work, skill, capability and medical fitness" --> the same as the indicators in the RSPO P&C 2018
22	6.1.3	FONAP task force: which type of protection? Please, specify.
23	6.1.3	Editor's suggestion: added in accordance with applicable regulations
24	6.1.3	Editor's suggestion: added in accordance with applicable regulations
25	6.2	Checklist for employment contracts in IOM's Migrant Worker Guidelines for Employers: https://publications.iom.int/books/migrant-worker-guidelines-employers-checklist-migrant-workers-accommodations
26	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
27	6.2.1	HRSS - Konveio: HRSSPropose wordings to cover prohibition against contract substitution (one of ILO's Forced Labour Indicators)- "Employment contracts shall set out the *terms & conditions of employment*, pay and other legal labour requirements that meets or exceeds national legal requirements. The employment contract shall be made available and explained in a language understood or spoken by the worker. A written copy of the employment contract shall be given to workers. Contract substitutions is prohibited unless these changes are made to meet local law and provide equal or better terms. Where foreign migrant workers are hired at the source country, they shall sign their employment contract at the source country."
28	6.2.1	This sentence is not clear that it will include employment procedures for recruitment, selection, hiring, promotion, retirement and termination - if not included , please add here OLD 3.5.1 and 3.5.2
29	6.2.1	Make sure all workers hold a permanent contract, except the one who works on seasonal basis
30	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
31	6.2.1	*"... explained in a language understood or spoken by the worker, and in a manner that considers the worker's literacy level."
32	6.2.1	Can we refer to CBA and/or company regulations? In a sense it should be based on mutual agreed terms.
33	6.2.1	FONAP task force: there should be provisions for illiterate workers that cannot read. Currently, this situation is not covered and could lead in the worst case scenario to discrimination or abuse.
34	6.2.1	There should be provisions for illiterate workers that cannot read. Currently, this situation is not covered and could lead in the worst case scenario to discrimination or abuse.

#	Indicator	Comment (English)
35	6.2.2	HRSS - Propose the following rewording: The Unit of Certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities, complying with national standards or above. Where no national laws are available, reference shall be made to the ILO Guidance on Workers' Housing Recommendation, 1961 (No. 115). In the case of acquisitions of non-certified units, a time-bound *plan* (maximum 5 years) is developed detailing the upgrade of infrastructure. The Unit of Certification shall review the plan annually to ensure that workers' welfare and safety is protected. The plan shall meet national and/or international law requirements
36	6.2.2	HRSS- Add are used. "...National laws, or in their absence the ILO Guidance on Workers' Housing are used"
37	6.2.2	RSPO may consider splitting this requirement in two or more criteria. One for housing, another for sanitation facilities, water supplies, and another for educational, etc.
38	6.2.2	Is not clear why the UoC should provide with educational and welfare amenities. Large plantations may require this when workers are living in the facilities but not the ones that depend on the local workforce. This may be a problem for plantations on Latam and Africa
39	6.2.2	Not all units of certification require to have workers living in their facilities. Workers may live near by and can travel in and out from their homes every day. This especially should not be applicable for mills with small land banks that depends on medium and small growers. There has been misinterpretation of this requirement specially in the Latam and African region where migran workers are not an issue and companies depend on local workforce
40	6.2.2	FONAP task force: there are sentences without verbs. Please, improve the wording. Water supply needs to be defined, regarding safe drinking water quality. Please, refer to the WHO drinking water parameters as an acceptable standard. See WHO parameters in the following table. Or assure that water is treated (boiled, filtered, or chlorinated).
41	6.2.2	to add the specific timeline rather than just a plan
42	6.2.2	Please see: Key actions for living conditions can be found in IOM's Migrant Worker Guidelines for Employers, page 40: https://publications.iom.int/books/migrant-worker-guidelines-employers Checklist for migrant workers' accommodations in IOM's Migrant Worker Guidelines for Employers: https://publications.iom.int/books/migrant-worker-guidelines-employers-checklist-migrant-workers-accommodations
43	6.2.2	The phrase starting with "National laws..." is disconnected from the rest of the indicator
44	6.2.2	Educational... what is the intention here? I RSPO willing to give capacitation to workers or to generate schooling for the children of the workers? this needs to be precise.
45	6.2.2	HRSS- "reasonable period" is not auditable, propose to retain the "The 5-year timeframe for improving infrastructure seems to have been eliminated " as stated in the P&C 2018
46	6.2.2	Editor's suggestion: added in accordance with applicable regulations

#	Indicator	Comment (English)
47	6.2.2	<p>1) Editorial changes to indicator 6.2.2 “The unit of certification needs to provide various kinds of facilities and infrastructure. If the certification unit acquires non-certified companies, they need to develop a plan for how to improve the infrastructure that must be provided”</p> <p>2) Another input from indicator 6.2.2, the P&C Review needs to translate the limits or parameters of the phrase “reasonable timeframe to ensure safety protection and worker welfare”. So, it is necessary to specify how long the time period will be, so that it is not just written "appropriate time period", because it is necessary to determine how many years it will be.</p> <p>3. Added the editorial "Facilities for workers provided by Unit Certification, shall not be considered as elements of living wage calculation"</p>
48	6.2.2	That the acquisition process does not only occur from companies that have been certified to companies that have not been certified. What if there is a condition where a company that has been certified acquires another company that has been certified but has a lower standard? The concern is, how can the RSPO be able to develop a standard to ensure that the improvements that have been made to the company that has been acquired earlier are also made but it has a lower standard. the hope is that it can be adopted into the guidance notes
49	6.2.2	added in accordance with applicable regulations
50	6.2.2	Editorial suggestions: added in accordance with applicable regulations
51	6.2.2	Editorial suggestions: added in accordance with applicable regulations
52	6.2.3	It is important to include the concept of "nutritious diet" and refer to the internationally accepted term FOOD SECURITY. See the following as a reference standard: https://foodsecuritystandard.org/
53	6.2.3	FONAP task force: important to include the concept of "nutritious diet" and refer to the internationally accepted term FOOD SECURITY. See the following as a reference standard: https://foodsecuritystandard.org/
54	6.2.3	HRSS- What is the expectation with the term "access"? Is it providing transport to local markets or is it establishing sundry shops in the UoC?
55	6.2.3	<p>1) The PnC review task force needs to compile in detail the definitions and parameters of the sentence ". . .access to adequate and affordable food”, do the parameters need to be clarified?</p> <p>2) There is a proposed guidance note for indicator 6.2.3: "The unit of certification based on the definitions and parameters prepared by the PnC review task force needs to prepare a plan and implementation report or report on fulfillment of the plan related to efforts to provide access to adequate and affordable food for the workers. Thus, there is a clear measure that can be measured by the auditor.</p>
56	6.2.4	Agree with many comments stating that some parts of this indicator and guidance need clarity. But it's important to note that the issue this indicator is trying to address is that of workers being repeatedly hired on short-term and temporary contracts to perform work activities that are "necessary and desirable", placing them under precarious employment conditions, in contravention of workers' legal rights and ability to organize, receive benefits and other entitlements, and contrary to some countries' regulations.

#	Indicator	Comment (English)
57	6.2.4	Suggested to elaborate on the 'workers should not be repeatedly hired on temporary contracts' as there are some post-retirement employees who will work on annual contract basis.
58	6.2.4	Please note that the migrant workers eg. Indonesian workers who hold a contract of 2 years is considered as permanent workers. The terminology of repeated hired is misleading. Temporary workers are hired on a need basis. If the workers is hired for 3 months temporarily and we require to extend for another 3 months, is it prohibited? We would suggest that any worker shall not be repeated hired for more than 2 years (for the countries which do not have the national laws to govern the engagement of temporary workers) or according to the applicable national laws.
59	6.2.4	Core work should be defined.
60	6.2.4	FONAP task force: additional clauses should be added to avoid abuse of the form of multiple consecutive temporary contracts e.g., to avoid payment of worker's benefits.
61	6.2.4	When the definition of core work is delegated to the UoC then the requirement becomes ambiguous to all UoC
62	6.2.4	When workers are hired on a temporary contract for a seasonal job, why should they be excluded of the opportunity to be hired again when the next need arises from the seasonal characteristic of the job? (High crop season during 4-5 months per year in Africa)
63	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
64	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
65	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
66	6.2.4	Proposed Changes to the guidance notes to: Workers employed on a contractual basis to do temporary/seasonal work, referring to applicable national laws.
67	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
68	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
69	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
70	6.2.4	There is a term worker which maybe doesn't exist in Indonesia but it is here. The Coalition realizes that these principles will be adopted at the global level.

#	Indicator	Comment (English)
71	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
72	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
73	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
74	6.2.4	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI
75	6.2.4	Proposed Amendment of indicator 6.2.4 guidance notes to: Workers employed on a contractual basis to do temporary/seasonal work, referring to the applicable national legal regulations.
76	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
77	6.2.4	1) PnC review needs to make definitions related to the terms they use, what is meant by casual workers, temporary workers, daily workers. That needs to be clarified before deciding whether it is contextual in Indonesia or not. 2) There is a guidance note for indicator 6.2.4: The guidance note on this indicator that workers should not be hired multiple times on temporary contracts. Then, the reference used is a reference to regulations at the national level if there is an applicable national law. Coalition notes, in adopting national regulations or applicable national laws, what needs to be ensured is that the regulatory requirements that are met are the same as the standards that were in effect previously in 2018 or that the arrangements are better. So. this discussion refers to national regulations if there is an applicable national law with a note that the regulated requirements must apply equally and/or better. 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 buses, childcare, etc.
78	6.2.4	Proposed Changes to the guidance notes to: Workers employed on a contractual basis to do temporary/seasonal work, referring to applicable national laws.
79	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
80	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
81	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law

#	Indicator	Comment (English)
82	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
83	6.2.4	HR needs to check whether the guidance note needs to be proposed to be deleted or not the problem is maintained because there is a sentence referring to national regulations
84	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
85	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
86	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
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89	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
90	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
91	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
92	6.2.4	For the Guidance notes, it is proposed to refer to national regulations regarding seasonal/temporary workers
93	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
94	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
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#	Indicator	Comment (English)
98	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
99	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
100	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
101	6.2.4	Proposed Changes to the guidance notes to: Workers employed on a contractual basis to do temporary/seasonal work, referring to applicable national laws.
102	6.2.4	Changes to the guidance note: workers who are employed on a temporary/seasonal basis, refer to national law if there is an applicable national law
103	6.2.4	Propose to change the guidance note to "Workers employed on a temporary/seasonal basis, referring to national law if there is an applicable national law"
104	6.3	Please see: IRIS Standard, Principle 3 Respect for transparency of terms and conditions of employment: https://iris.iom.int/iris-standard Key actions for payment of wages and benefits can be found in IOM's Migrant Worker Guidelines for Employers, page 36: https://publications.iom.int/books/migrant-worker-guidelines-employers

#	Indicator	Comment (English)
105	6.3	<p>HRSS- Propose to split this into 2 separate criteria. and simplify the language as type of employment is defined in our proposed definition of worker. E.g.,</p> <p>6.3- Pay for all workers meet legal or industry minimum standards, whichever is higher.</p> <p>6.3.1 (C)- Workers shall be paid according to the terms in their employment contract (monthly/weekly/daily as relevant). The Unit of Certification shall maintain records for each and every type of worker, of hours worked (both regular and overtime), calculation of wages and lawful deductions, and actual wages paid. Workers shall be provided payslips showing all details of payments and deductions. Where a family has multiple workers employed by the Unit of Certification (UoC), the work done and the wages earned shall be reflected in their individual payslips. The UoC shall ensure the details of the payslip are explained to the worker in a language they understand.</p> <p>6.3.2 (C) All workers shall be paid legal minimum wage or minimum wage negotiated in Collective Bargaining Agreements (CBAs), whichever is higher.</p> <p>Noting the following:</p> <p>a. Any performance bonuses and overtime pay shall not be counted as part of the legal minimum wage or CBA minimum wage</p> <p>b. For piece rated work, the proportionate pay shall be calculated based on the legal minimum wage or the rate under Collective Bargaining Agreement.</p> <p>c. UoC shall reimburse overtime work at a national premium rate. Where a premium rate is not available, the rate of pay for overtime shall be not less than one-and-one-quarter times the regular rate (see ILO Conventions No. 1 and No. 30).</p> <p>d. Where a work-day is curtailed due to workplace incidents/injuries or force majeure event, a full day compensation shall be provided.</p> <p>6.4- Living Wage shall be paid to all workers, progressively.</p> <p>6.4.1 (C) Unit of Certification shall calculate their prevailing wages in accordance to RSPO prevailing wage calculation procedure.</p> <p>PROCEDURAL NOTE: RSPO Secretariat and LW-TF shall revise and strengthen existing RSPO's prevailing wage calculation guidance into prevailing wage calculation Procedure</p>
106	6.3	Proposed to delete because the requirements regarding discrimination already exist in Indicator 4.1.1
107	6.3.1	Please specify how this indicator can be implemented in the case of smallholders.
108	6.3.1	FONAP task force: please, specify how this indicator can be implemented in the case of smallholders
109	6.3.1	It is important to consider that for small producers that hire labor this is a problem since they are not used to keeping controls and a lot of labor is by word of mouth or by workday or by task agreed upon by the parties.

#	Indicator	Comment (English)
110	6.3.1	[Abidjan, 13 Dec 2022] 6.3.1, Considering the local context, workers hired through third party (not permanent to the UoC), it is not possible for UoC to maintain all the records. Wordings should be provided for the scenario above - the UoC ensure sub-contract/ labour contractor or suppliers maintains records..., and actual wages paid.
111	6.3.1	You must say and / or as the case may be. For example, what happens with the issue of piecework or by activity?
112	6.3.1	This, in the case of Guatemala, is an issue that can be complex for activities that are paid by piece rate. Keeping track of hours per individual can be complex for implementation and complex to interpret in terms of auditability. Therefore, the suggestion would be that workers be paid in accordance with the law and in the manner established in their contract/work agreement and let it happen in matters where the piece rate applies.
113	6.3.2	The time-bound wage improvement plans should be developed in close collaboration with workers' representation bodies (if available trade unions, otherwise democratically elected worker committees, or other legally accepted entities) and buyers. RSPO should implement mechanisms to allow buyers to contribute to wage improvements by premium payments. Living wage calculations should be based on GLWC methodologies and procedures
114	6.3.2	daily workers with “no work no pay” shall be paid if force majeure occurred
115	6.3.2	..or weather factors limiting the day's work after the worker has presented him/herself,
116	6.3.2	FONAP task force: DLW needs to be spelled out (decent living wage?) The time-bound wage improvement plans should be developed in close collaboration with workers' representation bodies (if available trade unions, otherwise democratically elected worker committees, or other legally accepted entities) and buyers. RSPO should implement mechanisms to allow buyers to contribute to wage improvements by premium payments. Living wage calculations should be based on GLWC methodologies and procedures.
117	6.3.2	DLW should be implemented in a way that the grower will have the ability and capacity to pay.
118	6.3.2	The procedural note has been made available since the last P&C 2018. Will this affect the credibility of RSPO P&C 2023 by carrying forward the impending topic which cannot be done after 5 years? How fast can RSPO move on this and ensure the DLW benchmark is pragmatic and does not cause operational disruption. DLW sounds great but how far it applies in term of auditability and applicability, what happen if the DLW is higher than minimum wage of the country? How would this affect the members at the national scale where RSPO companies are paying a higher wages compared to non-RSPO companies? Nevertheless, is the concept of DLW only applicable for producers but not the rest of actors in the supply chain via the principle of shared responsibilities?
119	6.3.2	DLW now only Living Wage, still, for the implementation must using national wages structure first as priority, to avoid conflict with government.

#	Indicator	Comment (English)
120	6.3.2	on the procedural note. 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.
121	6.3.2	DLW was in P&C since 2018, so country benchmarks should be a priority now.
122	6.3.2	Proposed changes to Indicator 6.3.2: 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
123	6.3.2	Proposed changes to Indicator 6.3.2: 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.

#	Indicator	Comment (English)
124	6.3.2	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
125	6.3.2	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
126	6.3.2	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
127	6.3.2	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.

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128	6.3.2	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
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132	6.3.2	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1

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133	6.3.2	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
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#	Indicator	Comment (English)
136	6.3.2	<p>Proposed changes to Indicator 6.3.2:</p> <p>1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations</p> <p>2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages.</p> <p>4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed.</p> <p>4. clarify in the guideline the provisions ratified by the country.</p>
137	6.3.2	Proposal for Indicator 6.4.1 to be deleted because the provisions related to discrimination have been included in indicator 4.1.1
138	6.3.2	<p>Indicator 6.3.2.</p> <p>Proposal 1: Editorial changes to: Wages are paid to all workers, regardless of the type of work (permanent, temporary, seasonal, freelance, contract, migrant, and daily workers) in accordance with applicable national regulations.</p> <p>Proposal 2: Delete procedural notes because the proposed revision of indicator 6.3.2 already includes. Explanation: Several countries such as Indonesia no longer require the RSPO-specific DLW guidelines because regulations related to wages already govern the provisions of the DLW.</p> <p>Proposal 3: Editorial changes, Guidance note: Determination of wages according to the wage provisions of each country, for countries that do not yet have a reference for calculating wages can follow the DLW concept. For countries that already have a reference for calculating wages, follow the provisions of the applicable regulations. The RSPO has no legitimacy in calculating the minimum wage in one country and it is better to wait for the benchmark by the ILO which is being reviewed.</p>
139	6.3.2	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
140	6.3.2	Proposal for Indicator 6.4.1 to be deleted because the provisions related to discrimination have been included in indicator 4.1.1
141	6.3.2	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1

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142	6.3.2	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
143	6.3.2	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
144	6.3.2	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.

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145	6.3.2	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
146	6.3.2	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
147	6.3.2	<ol style="list-style-type: none"> 1. Some countries already have regulations regarding wages so that procedural records can be deleted 2. The Indonesian government has included all components of a Decent Living Wage through the Remuneration Council regularly every year in determining the minimum wage 3. Payments are made to all workers in accordance with relevant national regulations 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations.
148	6.3.2	"Proposed revision: No children may be in an area designated as a hazardous area by the unit of certification"

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149	6.3.2	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
150	6.3.2	<p>A Decent Living Wage in accordance with the intent of the RSPO cannot be implemented in Indonesia because: (1) there is no standard for a Living Wage for Indonesia, (2) Indonesia has implemented a Minimum Wage that complies with laws and regulations, (3) UHL implementation can lead to structural differences salary between 1 company that is RSPO certified and 1 company that is not RSPO certified in 1 area, of course this will cause jealousy among workers in companies in that area</p>
151	6.3.2	<p>Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1</p>

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152	6.3.2	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
153	6.3.2	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
154	6.3.2	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
155	6.3.2	<p>Editorial change to: Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, casual, contract, migrant and casual workers) in accordance with relevant national regulations.</p> <p>- Removing procedural notes because the proposed revision of indicator 6.3.2 already includes this information. Explanation: Several countries no longer require DLW guidelines because regulations related to wages already regulate this</p>
156	6.3.2	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1

#	Indicator	Comment (English)
157	6.3.2	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
158	6.3.2	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
159	6.3.2	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
160	6.3.2	Proposed indicator 6.4.4 is deleted because it is the same as indicator 4.1.1
161	6.3.2	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
162	6.3.2	<p>Proposal 1: In more detail regarding permits, at least it states what permits are needed</p> <p>Proposal 2: Indicators 2.2.2 and 2.2.3 Merged and added words of information related to legality Becoming: The unit of certification provides legality information to all third parties, labor recruiters , service providers and contracted labor contractors.</p>

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163	6.3.2	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
164	6.3.2	The term force mayor is left to discretionary interpretation and represents an auditability risk. so it should only be held in case of accidents at work.
165	6.3.2	It is necessary that the RSPO specifically define the Living Wage for each one of the countries and not leave it in the hands of the UoC derived from the fact that this can bring biases that would lead to an imminent risk of errors and adjustments to wages over time. so it must be a well-established guideline with a solid base and with the key player that is the RSPO leading the issue.
166	6.3.2	6.3.2 Define the concept "Force Majeure Reasons" described in item d), or describe that it is in accordance with the national legislation of each country, in the same way describe the time that the certification unit must cover the Force Majeure Reason Higher, to reduce the probability of discretion in the interpretation of this indicator. In the same way as the reference values that have been used within the standard, they must be appropriate and realistic to the local context and the national legislation of each country.
167	6.3.2	I agree with the reference that GREPALMA makes, this can lead us to an issue of non-auditability and various interpretations of what "Cases of Force Majeure" imply.
168	6.4	6.4 missing text: ... Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.
169	6.4	Yes, this is critical, something the previous standards TF worked on to incorporate into the P&C.
170	6.4	<p>Key actions for freedom of association and collective bargaining can be found in IOM's Migrant Worker Guidelines for Employers, page 35:</p> <p>https://publications.iom.int/books/migrant-worker-guidelines-employers</p>

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171	6.4	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
172	6.4	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
173	6.4	Sentences in criterion 6.4 are incomplete
174	6.4.1	A critical indicator should clearly recognize the right to exert freedom of association and collective bargaining rights - rather than a public statement, which doesn't guarantee the actual respect of these ILO convention elements.
175	6.4.1	FONAP task force: a critical indicator rather should clearly recognize the right to exert freedom of association and collective bargaining rights - rather than a public statement, which doesn't guarantee the actual respect of these ILO convention elements.
176	6.4.1	Add "Collective Bargaining Agreement" as indicator of social dialogue in Unit Certification.
177	6.4.1	HRSS- how to audit "demonstrably implemented" ?
178	6.4.1	HRSS- Proposed new wordings: The Unit of Certification shall have a policy recognising freedom of association and the right to collective bargaining. This policy shall be accessible and socialised to workers in a language that they understand and is implemented.
179	6.4.1	Proposed changes to Indicator 6.3.2: 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
180	6.4.1	In "definition" part, to add definition of "force majeure", which include natural disasters e.g floods and haze. Note: daily workers with "no work no pay" shall be paid if force majeure occurred.
181	6.4.2	FONAP task force: wording should be improved with emphasis placed on the implementation of the agreement
182	6.4.2	Indicator 6.4.4 should be deleted because it is included in indicator 4.1.1
183	6.4.3	FONAP task force: shall be upgraded to a critical indicator C
184	6.4.3	HRSS- Propose to include "registered trade unions" to keep consistent with 6.4.2.

#	Indicator	Comment (English)
185	6.4.3	FONAP task force: shall be upgraded to a critical indicator C
186	6.4.4	FONAP task force: this element could rather be included in the other principles indicators about no discrimination. And avoid repetition here.
187	6.4.4	HRSS_ - Add "and/or"- Management shall ensure that union members, worker representatives and/or workers are not subjected to discrimination, intimidation or harassment (including threats), retaliation for being union members, representatives for workers' organisation or being engaged in organising workers.
188	6.4.4	We welcome the proposed addition
189	6.4.4	“Unit certification assure save environment for workers and their representative to encourage constructive social dialogue.”
190	6.4.4	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.

#	Indicator	Comment (English)
191	6.4.4	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
192	6.4.4	Suggestion: remove the word "discrimination" because the requirements related to discrimination have been included in indicator 4.1.1.
193	6.4.4	Suggestion: remove the word "discrimination" because the requirements related to discrimination have been included in indicator 6.1.1.

#	Indicator	Comment (English)
194	6.4.4	<p>"Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of the type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Removing procedural records due to the proposed revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need the DLW guide because regulations related to wages already regulate this. 3. standard working time somewhere and sufficient to cover a decent standard of living for workers and their families The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set wages minimum In addition, the Indonesian Minimum Wage Esia is routinely negotiated through a tripartite process, involving government, trade unions and companies. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 5. be clear in the guidelines on the provisions ratified by the state."
195	6.4.4	Suggestion: remove the word "discrimination" because the requirements related to discrimination have been included in indicator 4.1.1.
196	6.4.4	<p>Proposal 1: Editorial changes to: Wages are paid to all workers, regardless of the type of work (permanent, temporary, seasonal, freelance, contract, migrant, and daily workers) in accordance with applicable national regulations.</p> <p>Proposal 2: Delete procedural notes because the proposed revision of indicator 6.3.2 already includes. Explanation: Several countries such as Indonesia no longer require the RSPO-specific DLW guidelines because regulations related to wages already govern the provisions of the DLW.</p> <p>Proposal 3: Editorial changes, Guidance note: Determination of wages according to the wage provisions of each country, for countries that do not yet have a reference for calculating wages can follow the DLW concept. For countries that already have a reference for calculating wages, follow the provisions of the applicable regulations. The RSPO has no legitimacy in calculating the minimum wage in one country and it is better to wait for the benchmark by the ILO which is being reviewed.</p>
197	6.4.4	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
198	6.4.4	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1

#	Indicator	Comment (English)
199	6.4.4	Proposed changes to Indicator 6.3.2: 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this
200	6.4.4	Suggestion: remove the word "discrimination" because the requirements related to discrimination have been included in indicator 4.1.1.
201	6.4.4	Proposals to remove because requirements related to discrimination have been included in indicator 4.1.1
202	6.4.4	Proposed Editorial Change 1: Removed "accessible for women and children" because women and children have become part of the affected Parties and employees accessed by related parties, including the community, planters, workers, their representatives, women and children (if possible/necessary), as well as other relevant stakeholders.
203	6.4.4	Proposed changes to Indicator 6.3.2: 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
204	6.4.4	Input on indicator 6.3.1 - Arranging changed to negotiating - added, every problem must be dialogued/dialogized and negotiated PKB
205	6.4.4	Proposals to remove because requirements related to discrimination have been included in indicator 4.1.1

#	Indicator	Comment (English)
206	6.4.4	<p>Proposal1: Editorial change to: Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, casual, contract, migrant and casual workers) in accordance with relevant national regulations.</p> <p>Proposal 2: Delete procedural notes because the proposed revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the RSPo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. IGC Letter on 6 October 2022: The system and mechanism of determining the minimum wage by the Indonesian Government has considered all Decent Living Wage Components that are accepted by workers for a standard work time in a particular place and is sufficient to cover a decent standard of living for the workers and their families.</p>
207	6.4.4	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
208	6.4.4	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
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#	Indicator	Comment (English)
211	6.4.4	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
212	6.4.4	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
213	6.4.4	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1

#	Indicator	Comment (English)
214	6.4.4	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
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216	6.4.4	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
217	6.4.4	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanen tt,emporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this

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219	6.4.4	<p>Suggestion: remove the word "discrimination" because the requirements related to discrimination have been included in indicator 4.1.1.</p>
220	6.4.4	<p>Proposed changes to Indicator 6.3.2:</p> <ol style="list-style-type: none"> 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.

#	Indicator	Comment (English)
221	6.4.4	Proposed editorial changes in the guidance notes to "Determination of wages in accordance with the wage calculations of each country. The reference for calculating wages following the DLW concept can be applied to countries that do not yet have a reference, while for countries that already have a reference for calculating wages, they can follow developments in the provisions apply"
222	6.4.4	Proposed changes to Indicator 6.3.2: 1. Wages are paid to all workers, regardless of type of work (eg permanent, temporary, seasonal, freelance, contract, migrant, and casual workers) in accordance with relevant national regulations 2. Deleting of procedural records due to proposals revision of indicator 6.3.2 already includes this information. Explanation: Some countries no longer need DLW guidelines because regulations related to wages already regulate this. hours worked somewhere and sufficient to cover a decent standard of living for workers and their families. The Government of Indonesia has a Remuneration Board consisting of relevant Government agencies, Employers' Organizations, Trade Unions, experts and academics to prepare rules and formulas used to set minimum wages. In addition, Indonesia's Minimum Wage is routinely negotiated through a tripartite process, involving the government, trade unions and employers. Participatory decision making which is absent in GLWC. As a company operating in Indonesia, we comply with government regulations regarding remuneration and minimum wages. 4. Editorial changes. For countries that already have a reference for calculating wages, follow the development of applicable regulations. because the Rspo has no legitimacy in calculating the minimum wage and it is better to wait for the benchmark by the ILO which is being reviewed. 4. clarify in the guideline the provisions ratified by the country.
223	6.4.4	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
224	6.4.4	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
225	6.4.4	Proposals to remove the conditions related to discrimination have been included in indicator 4.1.1
226	6.4.4	Input on indicator 6.4.4 needs to be added "had a mutation, demotion (demotion)
227	6.5	Decent Living Wage (DLW)
228	6.5.1	Child labor should be accepted, ILO convention states: Not all work done by children should be classified as child labour that is to be targeted for elimination. The participation of children or adolescents above the minimum age for admission to employment in work that does not affect their health and personal development or interfere with their schooling, is generally regarded as being something positive. This includes activities such as assisting in a family business or earning pocket money outside school hours and during school holidays. These kinds of activities contribute to children's development and to the welfare of their families; they provide them with skills and experience, and help to prepare them to be productive members of society during their adult life.
229	6.5.1	what is the practicality and auditability of this indicator? how can one remediate child labour?
230	6.5.2	FONAP task force: for the sake of a logical order of indicators, this one should go after 6.5.3

#	Indicator	Comment (English)
231	6.5.2	what about if the workers are ignore the company rule to not using children to the work area? whether by firing the worker including the mechanism of remediation?
232	6.5.2	We welcome the proposed addition
233	6.5.2	-The gender committee was changed to the Women Welfare Committee. -The committee must meet every 3 months. -The company must review the meeting notes from the committee. Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up."
234	6.5.2	Emphasizing points in the policy should also be included in the contract with the supplier.
235	6.5.2	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
236	6.5.2	Emphasizing points in the policy should also be included in the contract with the supplier.
237	6.5.2	The gender committee was changed to the Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting records of the committee
238	6.5.2	Proposal to delete the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, because there will be an inspection by CB/ASI/RSPO
239	6.5.2	This indicator does not need to stipulate the inclusion of policies (forced labour, and the results of human trafficking, recruitment fees and other illegal costs) in the contract clauses, it is enough to stipulate that this is disseminated to related third parties.
240	6.5.2	"Proposal to remove the sentence ""Required guidance – scope of due diligence based on risk assessment". Explanation: There is no need for due diligence, because there will be an inspection by CB/ASI/RSPO. Minor additions to procedures, if needed."
241	6.5.2	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
242	6.5.2	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed.

#	Indicator	Comment (English)
243	6.5.2	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
244	6.5.2	Emphasizing points in the policy should also be included in the contract with the supplier.
245	6.5.2	Input in the form of adding redactions to the "prevention" and "on forced labor" sections in indicator 6.8.1 (K): 1) In prevention, to add "Creating conditions that contribute directly or indirectly to the occurrence of debt bondage and expensive daily living costs for the workers and their families. 2) On forced labour, to add "prohibition of debt bondage and wage withholding" with "wage cut due to not achieving working target".
246	6.5.2	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed.
247	6.5.2	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification.
248	6.5.2	"- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence ""The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up""
249	6.5.2	Suggestion: remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO. Editorial changes to: The unit of certification develops and implements policies and procedures (if needed) regarding the prevention of:
250	6.5.2	Emphasizing points in the policy should also be included in the contract with the supplier.
251	6.5.2	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
252	6.5.2	"The proposed revision of Indicator 6.5.4 becomes: No children may be in an area designated as a dangerous area by the unit of certification"
253	6.5.2	Criterion 6.6 should be deleted because it is included in indicator 4.1.1
254	6.5.2	Emphasizing points in the policy should also be included in the contract with the supplier.
255	6.5.2	Emphasizing points in the policy should also be included in the contract with the supplier.

#	Indicator	Comment (English)
256	6.5.2	Suggestion: remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO.
257	6.5.2	Emphasizing points in the policy should also be included in the contract with the supplier.
258	6.5.2	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification
259	6.5.2	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
260	6.5.2	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed.
261	6.5.2	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed.
262	6.5.2	Emphasizing points in the policy should also be included in the contract with the supplier.
263	6.5.2	Proposed revision: No children may work in hazardous areas that have been determined by the company in the HIRAC, hazardous areas and have been determined by the company are given appropriate warning signs/warning signs
264	6.5.2	"Proposal to remove the sentence ""Required guidance – scope of due diligence based on risk assessment"" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed."
265	6.5.2	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification
266	6.5.2	Proposed changes: The Certification Unit establishes a Women's Welfare Committee, if necessary, meeting at least every three months to discuss all matters related to women's welfare, including complaints and grievances or issues related to the workplace. Explanation: There is no need to regulate the number of women's welfare committees
267	6.5.2	No children may be in areas designated as hazardous areas by the unit of certification.
268	6.5.2	Addition of indicators to criterion 6.5: Add "Unit certification shall prevent child labor by setting fair working targets for the workers and to implement decent wages."
269	6.5.3	This indicator partially corresponds to 6.4.3 of the P&C 2018. According to the ASI database, this indicator has never led to an NC.

#	Indicator	Comment (English)
270	6.5.3	HRSS- Proposed Wordings: All workers shall be above the national legal minimum working age. There shall be a documented age screening verification procedure. Workers under 18 years old shall not be engaged in hazardous work. Children under the national legal minimum working age who are above 12 years old and are assisting their families shall only be engaged in light work.
271	6.5.3	HRSS- Propose to add guidance for 6.5.3 in annex 2. Please extract Table 2 page 16 from the RSPO Guidance on Child Rights for Palm Oil Producers.
272	6.5.3	HRSS - Propose to add a definition of light work: "Work that is not likely to be harmful to children's health or development and not likely to be detrimental to their attendance at school or vocational training." (Taken from: ILO Convention No. 138 in Article 7)
273	6.5.3	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed.
274	6.5.4	HRSS- Propose to remove the word "gazetted" as it gives the impression that there is legal definition. Within this context, national laws usually gazette types of hazardous work. The other requirements are covered in 6.5.3. Proposed new wordings: There shall be no children present in designated hazardous work areas.
275	6.5.4	[Jakarta Consultation W/S, 6 Dec 2022] 6.5.4 please provide definition of 'hazardous area' - applicable across the entire Criteria or Principle. And include ... identified by the Unit of Certification.
276	6.5.4	Proposed to make it clear about the gazetted hazardous work areas become :gazetted hazardous work areas as identified by the UoC.
277	6.5.4	"FONAP task force: there is a significant gap in the child labor indicators: Worst Forms of Child Labor is not mentioned and neither ruled. The indicator should be upgraded to critical C."
278	6.5.4	6.5.4 is repeating 6.5.3
279	6.5.4	[Jakarta Consultation W/S, 6 Dec 2022] 6.5.4 define 'hazardous area'. Add to the end of the sentence, ... defined by the Unit of Certification.
280	6.5.4	There is a significant gap in the child labor indicators: Worst Forms of Child Labor is not mentioned and neither ruled. The indicator should be upgraded to critical C.

#	Indicator	Comment (English)
281	6.5.4	Suggestion: To delete the sentence "The unit of certification must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up" because: <ul style="list-style-type: none"> • Gender committee is changed to become Women Welfare Committee. • The committee must meet every 3 months. • The company must review the committee's meeting notes
282	6.5.4	"Proposed revision: No children may be in an area designated as a hazardous area by the unit of certification"
283	6.5.4	Proposed revision: No children may be in an area designated as a hazardous area by the unit of certification
284	6.5.4	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed.
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286	6.5.4	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed.
287	6.5.4	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed.
288	6.5.4	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
289	6.5.4	Suggestion: In order to emphasize the points in the policy, they must also be included in the contract with the supplier so that there is no need to detail it in the contract.
290	6.5.4	"Proposed revision of Indicator 6.5.2: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if children are found working at the location in accordance with applicable regulations"
291	6.5.4	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
292	6.5.4	Needs to be checked by HR Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
293	6.5.4	Editor's suggestion: Formulate and implement a zero tolerance policy towards all forms of intimidation, harassment (including sexual harassment), humiliation (including verbal insults), coercion (both physical and psychological) and violence. This policy must be made available and disseminated to all levels of the workforce, operations, labor suppliers and recruiters in a language they understand and use.

#	Indicator	Comment (English)
294	6.5.4	Emphasizing points in the policy should also be included in the contract with the supplier.
295	6.5.4	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification.
296	6.5.4	"Proposal to remove the sentence ""Required guidance – scope of due diligence based on risk assessment"" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPD Minor additions to procedures, if needed."
297	6.5.4	"Proposed revision: The Certification Unit is obliged to develop and implement procedures for the remediation of child work practices if it is found that there are children working at the location in accordance with applicable regulations"
298	6.5.4	"Proposed revision: The Certification Unit is obliged to develop and implement procedures for the remediation of child work practices if it is found that there are children working at the location in accordance with applicable regulations"
299	6.5.4	Proposal to abolish the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
300	6.5.4	"Proposal to remove the sentence ""Required guidance – scope of due diligence based on risk assessment"" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPD Minor additions to procedures, if needed."
301	6.5.4	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
302	6.5.4	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
303	6.5.4	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
304	6.5.4	"- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes of the committee Proposal to remove the sentence ""The unit of certification must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"""
305	6.5.4	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
306	6.5.4	Emphasizing points in the policy should also be included in the contract with the supplier.

#	Indicator	Comment (English)
307	6.5.4	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
308	6.5.4	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification
309	6.5.4	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPo Minor additions to procedures, if needed.
310	6.5.4	The gender committee was changed to the Women Welfare Committee. The committee must meet every 3 months. The company must review the meeting notes from the committee. Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up."
311	6.5.4	Proposal: editorial change to: No children may be in areas designated as hazardous areas by the unit of certification.
312	6.5.4	Sentences in criterion 6.4 are incomplete
313	6.5.4	Input is in the form of adding indicators to criterion 6.4: 1) Add "Unit certification assures a safe environment for workers and their representatives to encourage constructive social dialogue." 2) Add "Collective Bargaining Agreement" as indicator of social dialogue in Unit Certification"
314	6.5.5	HRSS- How to audit "welfare"? Propose to add more clarity here on what welfare covers, perhaps a non-exhaustive list. Auditors need to know what to verify.
315	6.5.5	HRSS- What is the expectation with the term "access"? Is it providing transport to educational facilities or to establish educational facilities?
316	6.5.5	FONAP task force: access to schools (e.g. buses, paid teachers, buildings, educational materials) need to be facilitated. This is one component of the basic needs/ living wage or income approach.
317	6.5.5	6.5.5. It is not clear in the first place if it refers to the children of the workers who left their communities to go to work at the UC, or that the children remain inside the UC while their parents or father works at the UC. If it is the first, and the children live outside the UC, the obligation is relegated to the state or government since it is a responsibility that is outside the "jurisdiction" of the company. On the contrary, in the second case, it is important for the UC to support a school for the education of children.
318	6.5.5	We welcome the proposed addition
319	6.5.5	[Jakarta Consultation W/S, 6 Dec 2022] 6.5.5 propose wordings: The Unit of Certification shall ensure access to education to children who stays within the Unit of Certification.
320	6.5.5	Access to schools (e.g. buses, paid teachers, buildings, educational materials) need to be facilitated. This is one component of the basic needs/ living wage or income approach.

#	Indicator	Comment (English)
321	6.5.5	Proposal: editorial changes to: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if children are found working at the location in accordance with applicable regulations.
322	6.5.5	6.5.5 Define and clarify for whom the described indicator is applicable, specifying the concept of “children of workers who remain within the certification unit”. Whether this indicator applies to the families of all workers in general or only to the families that reside within the certification unit. Likewise, access to education is a universal human right that must be guaranteed by the State, changing the focus of the UdC which is to "promote well-being and access to education"
323	6.6	Key actions for safe, decent and respectful work environment can be found in IOM's Migrant Worker Guidelines for Employers, page 34: https://publications.iom.int/books/migrant-worker-guidelines-employers
324	6.6	Emphasizing points in the policy should also be included in the contract with the supplier.
325	6.6.1	Suggest to rephrase zero-tolerance policy as it may not necessary must be zero tolerance policy. Alternatively, this component could be captured in Human Rights Policy therefore it is more appropriate to read as " A policy covering zero-tolerance towards all forms of....."
326	6.6.1	FONAP task force: a clearer and more effective approach is "all forms of....are prohibited."
327	6.6.1	HRSS- HRSS- Propose to use defined term and to refine language. Proposed wordings: A zero-tolerance policy towards all forms of Intimidation and Harassment (including threats), Sexual Harassment and Violence shall be established and implemented. This policy shall be made available and socialised to all levels of the workforce, operations, suppliers and labour recruiters in languages understood or spoken by them. This policy shall be included into the Unit of Certification's service contracts and supplier agreements.
328	6.6.1	A clearer and more effective approach is "all forms of....are prohibited."
329	6.6.1	Emphasizing points in the policy should also be included in the contract with the supplier.
330	6.6.1	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
331	6.6.1	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed.

#	Indicator	Comment (English)
332	6.6.1	Proposal: editorial changes to: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if children are found working at the location in accordance with applicable regulations.
333	6.6.1	Emphasizing points in the policy should also be included in the contract with the supplier.
334	6.6.1	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
335	6.6.1	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed.
336	6.6.1	Proposal: editorial changes to: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if children are found working at the location in accordance with applicable regulations.
337	6.6.1	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification
338	6.6.1	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
339	6.6.1	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
340	6.6.1	Suggestion: To remove the sentence "The unit of certification must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up" because: <ul style="list-style-type: none"> • Gender committee is changed to become Women Welfare Committee. • The committee must meet every 3 months. • The company must review the committee's meeting notes
341	6.6.1	Proposal to delete the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, because the inspection is carried out by CB/ASI/RSPO
342	6.6.1	Proposal to delete the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, because there will be an inspection by CB/ASI/RSPO

#	Indicator	Comment (English)
343	6.6.1	Suggestion: remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO. Editorial changes to: The unit of certification develops and implements policies and procedures (if needed) regarding the prevention of:
344	6.6.1	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification.
345	6.6.1	Emphasizing points in the policy should also be included in the contract with the supplier.
346	6.6.1	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
347	6.6.1	"- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes of the committee Proposal to remove the sentence ""The unit of certification must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up""
348	6.6.1	"Proposal to remove the sentence ""Required guidance – scope of due diligence based on risk assessment"" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed."
349	6.6.1	"Proposed revision: No children may be in an area designated as a hazardous area by the unit of certification"
350	6.6.1	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
351	6.6.1	"- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes of the committee Proposal to remove the sentence ""The unit of certification must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up""
352	6.6.1	"Proposed revision: No children may be in an area designated as a hazardous area by the unit of certification"
353	6.6.1	Is there still a need for due diligence on the implementation of this indicator if the UoC already has policies and procedures that govern it?
354	6.6.1	Suggestion: To delete the sentence "The unit of certification must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up" because: <ul style="list-style-type: none"> • Gender committee is changed to become Women Welfare Committee. • The committee must meet every 3 months. • The company must review the committee's meeting notes

#	Indicator	Comment (English)
355	6.6.1	Usul: Agar menekankan poin-poin dalam kebijakan harus juga tercakup dalam kontrak dengan supplier sehingga tidak perlu didetailkan lagi dalam kontrak.
356	6.6.1	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
357	6.6.1	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed.
358	6.6.1	"Proposed revision: No children may be in an area designated as a hazardous area by the unit of certification"
359	6.6.1	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed.
360	6.6.1	The Unit of Certification is obliged to develop and implement procedures for remediation of child labor practices if it is found that children work at the location according to applicable regulations
361	6.6.1	Suggest adding the editor "according to applicable regulations"
362	6.6.1	The inspection has been carried out by the auditor, RSPO and ASI so it does not require due diligence Proposed to delete: scope of due diligence based on risk assessment"
363	6.7	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
364	6.7	Add "Women workers who are a breadwinner, due to any cause, shall receive equal wages and benefits with men workers, without discrimination"
365	6.7	Key actions for health care and social protection can be found in IOM's Migrant Worker Guidelines for Employers, page 41: https://publications.iom.int/books/migrant-worker-guidelines-employers
366	6.7	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"

#	Indicator	Comment (English)
367	6.7.1	HRSS- Propose wordings: Propose to rephrase to : A policy to protect the rights of women workers (eg. reproductive rights, maternal health), shall be established and implemented...
368	6.7.1	FONAP task force: see previous comments on policies. Policies are not the best way to enforce concepts.
369	6.7.1	[Abidjan, 13 Dec 2022] 6.7.1 Please provide a definition on 'maternal health'.
370	6.7.1	include: "Unit certification fulfil specific rights of women workers, as stipulated in the national regulation or above". Note: example of the rights: menstruation leave, maternity leave, care givers leave.
371	6.7.1	"Proposed revision: The Certification Unit is obliged to develop and implement procedures for the remediation of child work practices if it is found that there are children working at the location in accordance with applicable regulations"
372	6.7.2	HRSS- Propose to add on the word "workers". Proposed rewording: "Women workers shall have access to opportunities and resources to improve themselves through training and capacity development programmes. "
373	6.7.2	HRSS- What do you mean by "access"? What should the auditor look for to verify compliance?
374	6.7.2	FONAP task force: potential repetition (see previous no discrimination indicators).
375	6.7.2	We welcome the proposed addition
376	6.7.2	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
377	6.7.3	How is this women welfare committee different from the Gender committee already existing?
378	6.7.3	[Abidjan, 13 Dec 2022] 6.7.3 Why is there a need to develop another (very specific) women committee - when in P&C 2018 has required establishment of gender committee?
379	6.7.3	HRSS- Proposed Wordings: "The Unit of Certification shall establish a Women's Welfare Committee comprised of management and women worker representatives. The Women's Welfare Committees shall meet quarterly at a minimum. The duties shall include: (i) Address issues of concern as well as opportunities for improvements for women workers (ii) Training and capacity development for career advancement for women (iii) Identify risks and raise awareness among workers on women's safety and health (e.g., access to healthcare during pregnancy, delivery and postpartum) (iv) Receive training annually on women's rights (iv) Discuss continual improvements that may be made by the UoC on women's issues or women's concerns (vii) Counselling for women affected by violence and/or sexual harassment The meetings shall be conducted in a language that is understood or spoken by its members. Minutes of meeting shall be documented. The unit of certification shall review the minutes of Women's Committee and take appropriate follow-up actions."
380	6.7.3	Ones question; this women welfare committee will replace the Gender Committee?. In this case we can just work with one committee (see P& C 2018, especially 6.5.1. Guideline for Gender Committee has been worked by RSPO.

#	Indicator	Comment (English)
381	6.7.3	FONAP task force: members of this committee need to be covered in previous indicators about no discrimination and no retaliation. THE TERM GRIEVANCE IS CURRENTLY NOT DEFINED IN THE DEFINITIONS SECTION. Participatory approach and social research techniques should also be mentioned in this section. The FONAP task force can provide input in this sense.
382	6.7.3	[Jakarta Consultation W/S, 6 Dec 2022] 6.7.3 - remove the requirement on 'meeting quarterly' frequency of meeting shall be determined by the needs and in accordance to local context. However more guidance needed - for example - the minimum members of the committee and the composition.
383	6.7.3	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSP0 Minor additions to procedures, if needed.
384	6.7.3	Emphasizing points in the policy should also be included in the contract with the supplier.
385	6.7.3	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSP0 Minor additions to procedures, if needed.
386	6.7.3	"- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes of the committee Proposal to remove the sentence ""The unit of certification must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up""
387	6.7.3	Emphasizing points in the policy should also be included in the contract with the supplier.
388	6.7.3	Proposed revision of the last sentence: The unit of certification must review the meeting notes from the committee and follow up on the results of the meeting notes if necessary.
389	6.7.3	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
390	6.7.3	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
391	6.7.3	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
392	6.7.3	Proposed revision: The Certification Unit is required to develop and implement a procedure for remediation of child labor practices if it is found that a child is working at a location in accordance with applicable regulations.
393	6.7.3	further explained the meaning of the phrase "equal alternative work" or can be changed to "alternative work that does not endanger the health and safety of pregnant women.

#	Indicator	Comment (English)
394	6.7.3	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
395	6.7.3	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
396	6.7.3	Emphasizing points in the policy should also be included in the contract with the supplier.
397	6.7.3	Suggestion: - To remove the sentence "The unit of certification must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
398	6.7.3	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPo Minor additions to procedures, if needed.
399	6.7.3	Emphasizing points in the policy should also be included in the contract with the supplier.
400	6.7.3	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPo Minor additions to procedures, if needed.
401	6.7.3	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification
402	6.7.3	There needs to be additional provision of access, by earning full wages during the training period
403	6.7.3	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
404	6.7.3	"- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes of the committee Proposal to remove the sentence ""The unit of certification must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up""
405	6.7.3	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
406	6.7.3	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification
407	6.7.3	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"

#	Indicator	Comment (English)
408	6.7.3	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed.
409	6.7.3	Need to accommodate abortion and menstruation leave
410	6.7.3	It is better not to regulate the frequency of women's welfare committee meetings, so that this is given freedom to the UoC according to the needs of operational conditions
411	6.7.3	Emphasizing points in the policy should also be included in the contract with the supplier.
412	6.7.3	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification
413	6.7.3	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
414	6.7.3	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification
415	6.7.3	Emphasizing points in the policy should also be included in the contract with the supplier.
416	6.7.3	"Proposed revision: The Certification Unit is obliged to develop and implement procedures for the remediation of child work practices if it is found that there are children working at the location in accordance with applicable regulations"
417	6.7.3	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
418	6.7.3	"Proposal to remove the sentence ""Required guidance – scope of due diligence based on risk assessment"" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed."
419	6.7.3	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
420	6.7.3	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification
421	6.7.3	"Proposed revision: The Certification Unit is obliged to develop and implement procedures for the remediation of child work practices if it is found that there are children working at the location in accordance with applicable regulations"
422	6.7.4	This indicator is a clear no-go. RATHER CONSIDER: Pregnancy tests shall only be conducted, to protect the physical integrity of female workers, but not form part of employment selection procedures.
423	6.7.4	Female

#	Indicator	Comment (English)
424	6.7.4	FONAP task force: this indicator is a clear no-go. RATHER CONSIDER: Pregnancy tests shall only be conducted, to protect the physical integrity of female workers, but not form part of employment selection procedures.
425	6.7.4	[Jakarta Consultation W/S, 6 Dec 2022] 6.7.4 - please provide definition or clear guidance on what is 'equivalent'?
426	6.7.4	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification.
427	6.7.5	Propose to be consistent and use "Unit of Certification", instead of "Management Unit".
428	6.7.5	FONAP task force: what does "new mother" mean in the labor context? Does this deal with women that just recently gave birth? And to accomodate their needs for child care and maternity leave? If so, please, improve the wording and upgrade to a critical indicator C.
429	6.7.5	[Jakarta Consultation W/S, 6 Dec 2022] 6.7.5 (maybe just for Bahasa Indonesia version) - the definition of new mother is not clear? Is it when the baby is born? or including during pregnancy?
430	6.7.6	As many women live at the plantation it would be good to include: 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. Note: example of discretion: to provide permit for the workers/victims to go to hospital, police department, legal aid office, therapy session, etc.
431	6.7.6	HRSS- Propose to italicize "gender sensitive" as it is defined
432	6.7.6	Propose to combine this indicator with 2.4.1, as both indicators are similar. This is to avoid redundancy.
433	6.7.6	FONAP task force: gender not only includes women (biological sex), but rather shall cover gender identity, gender expression and sexual orientation.
434	6.7.6	[Jakarta Consultation W/S, 6 Dec 2022] 6.7.6 this indicator is to be removed - as the grievance mechanism is covered under 2.4
435	6.8	The NI should only provide clarifications for special conditions where the national law stipulates certain fees be paid by workers or employers, and not be used to minimise or restrict the principle of the definition as agreed internationally and outlined by ILO. Even where workers are required to cover certain fees, the principle again for UoC is to ensure such fees linked to recruitment are reimbursed to workers.
436	6.8	We suggest to add an encompassing criteria on remediation for all forced labor breaches (not only reimbursement of recruitment fees)
437	6.8.1	For (ii) and (iii) on recruitment fees and illegitimate/unreasonable costs, please see: IRIS Standard, Principle 1 Prohibition of recruitment fees and related costs to migrant workers: https://iris.iom.int/iris-standard IOM's Guidance Note - Recruitment Fees and Costs supports employers of migrant workers in understanding ILO's definition of recruitment fees and related costs, identifying potential recruitment fees and related costs that may be incurred during the labour migration process and determining a transparent and sustainable price for recruitment with labour recruiters: https://publications.iom.int/books/migrant-worker-guidelines-employers-guidance-note-recruitment-fees-and-related-costs

#	Indicator	Comment (English)
438	6.8.1	FONAP task force: this indicator is repetitive. It has been covered by previous indicators already. The other option would be to move all forced labor/trafficking indicators here and consolidate them as one package of indicators.
439	6.8.1	Add: "Creating conditions that contribute directly or indirectly to the occurrence of debt bondage and expensive daily living cost for the workers and their family.
440	6.8.1	HRSS- To rephrase "iii) Workers' payment of illegitimate, undisclosed and unreasonable costs" for clarity purposes i.e. payment of illegitimate, undisclosed and unreasonable costs throughout the recruitment process.
441	6.8.1	The due diligence based on risk assessment for contractor / supplier is already covered in 2.2.2.
442	6.8.1	additional word : related "recruitment" cost
443	6.8.1	HRSS- We do not understand what is meant by "guidance needed - scope of due diligence is based on risk assessment" and to remove "workers" from payment of bribes and these can be made by the UoC as well.
444	6.8.1	[Jakarta Consultation W/S, 6 Dec 2022] 6.8.1 - The unit of certification ... policies and/or procedures on the prevention of:. Removed the last sentence of: 'This policy shall be included ... contracts and supplier agreements. Also due diligence is not necessary.
445	6.8.1	For "labour recruiters", a checklist for labour recruiter service agreements can be found in IOM's Migrant Worker Guidelines for Employers: https://publications.iom.int/books/migrant-worker-guidelines-employers-checklist-labour-recruiter-service-agreements
446	6.8.1	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
447	6.8.1	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
448	6.8.1	Proposal: editorial change to: No children may be in areas designated as hazardous areas by the unit of certification.
449	6.8.1	Emphasizing points in the policy should also be included in the contract with the supplier.
450	6.8.1	Emphasizing points in the policy should also be included in the contract with the supplier.
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#	Indicator	Comment (English)
454	6.8.1	Suggestion for improvement Indicator 6.8.1 : delete the sentence "Guidance required" – scope of due diligence based on risk assessment" Explanation: No due diligence is required, because there will be an inspection by CB/ASI/RSPO. Editorial changes to: The unit of certification develops and implements policies and procedures (if needed) regarding the prevention of:
455	6.8.1	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification
456	6.8.1	Emphasizing points in the policy should also be included in the contract with the supplier.
457	6.8.1	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
458	6.8.1	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification
459	6.8.1	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
460	6.8.1	Clarify who can designate a hazard area so it doesn't lead to multiple interpretations. Proposed improvement: added the editor "determination of a hazardous area by the unit of certification"
461	6.8.1	- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
462	6.8.1	"- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes of the committee Proposal to remove the sentence ""The unit of certification must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"""
463	6.8.1	"Proposal to remove the sentence ""Required guidance – scope of due diligence based on risk assessment"" Explanation: No due diligence is required, because there will be an inspection by CB/ASI/RSPO"
464	6.8.1	Emphasizing points in the policy should also be included in the contract with the supplier.
465	6.8.1	Need to check HR
466	6.8.1	Proposal to delete the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, because there will be an inspection by CB/ASI/RSPO

#	Indicator	Comment (English)
467	6.8.1	Proposed revision: The Certification Unit is required to develop and implement a procedure for remediation of child labor practices if it is found that a child is working at a location in accordance with applicable regulations.
468	6.8.1	"Proposal to remove the sentence ""Required guidance – scope of due diligence based on risk assessment"" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed."
469	6.8.1	"- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes of the committee Proposal to remove the sentence ""The unit of certification must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"""
470	6.8.1	Emphasizing points in the policy should also be included in the contract with the supplier.
471	6.8.1	"Proposal to remove the sentence ""Required guidance – scope of due diligence based on risk assessment"" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed."
472	6.8.1	"Proposed revision: The Certification Unit is obliged to develop and implement procedures for the remediation of child work practices if it is found that there are children working at the location in accordance with applicable regulations"
473	6.8.1	"Proposed revision: No children may be in an area designated as a hazardous area by the unit of certification"
474	6.8.1	"Proposed revision: The Certification Unit is obliged to develop and implement procedures for the remediation of child work practices if it is found that there are children working at the location in accordance with applicable regulations"
475	6.8.1	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification
476	6.8.1	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification
477	6.8.1	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPO Minor additions to procedures, if needed.
478	6.8.1	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
479	6.8.1	Proposal to remove the phrase "Required guidance – scope of due diligence based on risk assessment". Explanation: There is no need for due diligence, because there will be an inspection by CB/ASI/RSPO. Minor additions to procedures, if needed.
480	6.8.1	"- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes from the committee Proposal to remove the sentence "The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
481	6.8.1	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification

#	Indicator	Comment (English)
482	6.8.1	Proposal to remove the sentence "Required guidance – scope of due diligence based on risk assessment" Explanation: No due diligence is required, as there will be an inspection by CB/ASI/RSPD Minor additions to procedures, if needed.
483	6.8.1	Emphasizing points in the policy should also be included in the contract with the supplier.
484	6.8.1	"- Gender committee changed to Women Welfare Committee. - The committee must meet every 3 months - The company must review the meeting notes of the committee Proposal to remove the sentence ""The certification unit must review the minutes of the meeting of the Women's Welfare Committee and carry out related follow-up"
485	6.8.1	"Proposed revision: No children may be in an area designated as a hazardous area by the unit of certification"
486	6.8.1	Emphasizing points in the policy should also be included in the contract with the supplier.
487	6.8.1	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
488	6.8.2	Please see:IRIS Standard, Principle 2: Respect for freedom of movement, Criterion 2.1: https://iris.iom.int/iris-standard Key actions for access to personal documents can be found in IOM's Migrant Worker Guidelines for Employers, page 38: https://publications.iom.int/books/migrant-worker-guidelines-employers
489	6.8.2	[Abidjan, 13 Dec 2022] 6.8.2 proposed for the second statement on 'secure storage' to be removed – as in Cote d'Ivoire – individual should be responsible for its own documents, and it is against the law to have the employer to conduct safe keeping.
490	6.8.2	HRSS- Proposed wordings: "Workers shall not be required to surrender any government-issued identification, passports, or work permits to the unit of certification or those acting on its behalf, except for mandatory legal or immigration purposes within the standard processing time. The reasons for retention shall be explained to the workers. The Unit of Certification shall provide at the workers' request secure storage for these documents. Such storage shall be freely accessible to workers."
491	6.8.3	Definition of 'delayed' to be stated in 'definition' or explained herein as this is relative to the end of pay period either daily, weekly or monthly
492	6.8.3	Suggest to change fees to costs. According to ILO, recruitment fees eg. agent service fees and related costs eg. transportation, passport, lodging etc. are categorized as recruitment costs.
493	6.8.3	We suggest amend to "recruitment-related fees and costs" as per ILO terminology
494	6.8.3	On "withholding wages" - key actions for payment of wages and benefits can be found in IOM's Migrant Worker Guidelines for Employers, page 36: https://publications.iom.int/books/migrant-worker-guidelines-employers
495	6.8.3	add: "prohibition of debt bondage and wage withholding" with "wage cut due to not achieving working target"
496	6.8.3	HRSS- Propose to remove point v. as Payment recovery from workers is already covered under 6.8.8.

#	Indicator	Comment (English)
497	6.8.3	Proposal: local labor regulation replaced by national regulation
498	6.8.3	Emphasizing the implementation of best practice in the recruitment process and payment of wages
499	6.8.3	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
500	6.8.3	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
501	6.8.3	Proposal: local labor regulation replaced by national regulation
502	6.8.3	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
503	6.8.3	Proposal: local labor regulation replaced by national regulation
504	6.8.3	Emphasizing the implementation of best practice in the recruitment process and payment of wages.
505	6.8.3	Proposal for Improvement of Indicator 6.8.5 becomes: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if it has been agreed in the work agreement.
506	6.8.3	"Proposal: Procedural note deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate this statement under the guidelines and submit to respective national interpretations for further definition. Indicator 6.8.8 deleted /no need, because it's set in indicator 6.8.1 (6.8.8 repetition 6.8.1)."
507	6.8.3	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in the work agreement
508	6.8.3	Proposal: replace local labor regulation with national regulation.
509	6.8.3	"Needs to be examined Proposed revisions: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in the work agreement".

#	Indicator	Comment (English)
510	6.8.3	Communication makes it possible to be banned in certain locations on the basis of identification results based on potential hazards and risks (for example: processing locations at POM)
511	6.8.3	"Proposal: Procedural note deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate this statement under the guidelines and submit to respective national interpretations for further definition. Indicator 6.8.8 deleted /no need, because it's set in indicator 6.8.1 (6.8.8 repetition 6.8.1)."
512	6.8.3	Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
513	6.8.3	"Needs to be examined Proposal for revision: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in the work agreement"
514	6.8.3	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary.
515	6.8.3	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
516	6.8.3	Proposal: local labor regulation replaced by national regulation
517	6.8.3	"Needs to be examined Proposal for revision: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in the work agreement"
518	6.8.3	Proposal: Emphasize the implementation of best practice in the recruitment process and payment of wages.
519	6.8.3	Proposal: local labor regulation replaced by national regulation
520	6.8.3	Emphasizing the implementation of best practice in the recruitment process and payment of wages
521	6.8.3	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
522	6.8.3	"Needs to be examined Proposal for revision: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in the work agreement"
523	6.8.3	Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement

#	Indicator	Comment (English)
524	6.8.3	Emphasizing the implementation of best practice in the recruitment process and payment of wages
525	6.8.3	Proposal: Emphasize the implementation of best practice in the recruitment process and payment of wages.
526	6.8.3	"Needs to be examined Proposal for revision: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in the work agreement"
527	6.8.3	"Needs to be checked by HR. Proposed revision: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in the work agreement"
528	6.8.3	Proposal: Editorial changes to: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if it has been agreed in the work agreement.
529	6.8.3	Proposed revision: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
530	6.8.4	FONAP task force: this indicator should be upgraded to a critical indicator C
531	6.8.4	FONAP task force: this indicator should be upgraded to a critical indicator C
532	6.8.4	HRSS- propose to make indicator 6.8.4. Critical (C)
533	6.8.4	Key actions for working hours can be found in IOM's Migrant Worker Guidelines for Employers, page 37: https://publications.iom.int/books/migrant-worker-guidelines-employers
534	6.8.4	Please note that the Employment Act has the provision of double rate for any work on rest day. The work on rest day shall be mutually agreed between employer and employee voluntarily under certain scenario eg. emergency however it shall not be continuously for more than 14 days.
535	6.8.4	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
536	6.8.4	Proposal: Editorial changes to: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if it has been agreed in the work agreement.
537	6.8.4	Proposal: Indicator 6.8.8. used as a guide to indicator 6.8.1
538	6.8.4	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
539	6.8.4	Emphasizing the implementation of best practice in the recruitment process and payment of wages

#	Indicator	Comment (English)
540	6.8.4	Proposal: local labor regulation replaced by national regulation
541	6.8.4	Emphasizing the implementation of best practice in the recruitment process and payment of wages
542	6.8.4	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
543	6.8.4	Proposal: local labor regulation replaced by national regulation
544	6.8.4	"Needs to be examined Proposal for revision: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in the work agreement"
545	6.8.4	Proposal to improve indicator 6.8.4: "local labor regulation" replaced by the applicable national regulation.
546	6.8.4	Emphasizing the implementation of best practice in the recruitment process and payment of wages
547	6.8.4	Proposal: local labor regulation replaced by national regulation
548	6.8.4	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary
549	6.8.4	Emphasizing the implementation of best practice in the recruitment process and payment of wages
550	6.8.4	Is there still a need for due diligence for the implementation of this indicator if the UoC does not use labor recruitment services
551	6.8.4	Penalties can be implemented if they are clearly stated in the work agreement and agreed by both parties (employees and UoC)
552	6.8.4	Emphasizing the implementation of best practice in the recruitment process and payment of wages
553	6.8.4	Emphasizing the implementation of best practice in the recruitment process and payment of wages
554	6.8.4	Emphasizing the implementation of best practice in the recruitment process and payment of wages
555	6.8.4	Proposal: local labor regulation replaced by national regulation
556	6.8.4	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
557	6.8.4	Emphasizing the implementation of best practice in the recruitment process and payment of wages
558	6.8.4	Emphasizing the implementation of best practice in the recruitment process and payment of wages
559	6.8.4	Proposal: "local labor regulation" to be replaced by national regulation.
560	6.8.4	local labor regulation replaced by national regulation
561	6.8.4	Proposal: local labor regulation replaced by national regulation

#	Indicator	Comment (English)
562	6.8.4	Proposal: local labor regulation replaced by national regulation
563	6.8.4	Added except in the context of law enforcement because of crime.
564	6.8.4	Emphasizing the implementation of best practice in the recruitment process and payment of wages
565	6.8.4	Proposal: local labor regulation replaced by national regulation
566	6.8.4	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
567	6.8.4	Proposal: "local labor regulation" to be replaced by national regulation.
568	6.8.4	Emphasizing the implementation of best practice in the recruitment process and payment of wages
569	6.8.4	Proposal: local labor regulation replaced by national regulation
570	6.8.4	Adding indicators to criterion 6.6: Add "If domestic violence against workers is found in the unit certification, unit certification shall provide adequate discretion for the workers to settle the domestic violence. Note: example of discretion: to provide permits for workers/victims to go to hospital, police department, legal aid office, therapy session, etc.
571	6.8.4	Proposed revision: No children may be in areas designated as hazardous areas by the unit of certification
572	6.8.5	As stipulated in the MAPA/NUPW collective agreement in Malaysia, the migrant workers who wish to repatriate prematurely shall bear the air fare. This is a contractual agreement but not penalty.
573	6.8.5	[Jakarta Consultation W/S, 6 Dec 2022] 6.8.5 proposed rewording: 'Pekerja harus memiliki hak melamar kerja dan mengundurkan diri secara bebas dengan pemberitahuan tanpa adanya ancaman penalti kecuali jika pekerja dan perusahaan menyepakati penalti ke dalam perjanjian'
574	6.8.5	Proposal: local labor regulation replaced by national regulation
575	6.8.5	"Proposal: Procedural note deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate this statement under the guidelines and submit to respective national interpretations for further definition. Indicator 6.8.8 deleted /no need, because it's set in indicator 6.8.1 (6.8.8 repetition 6.8.1)."
576	6.8.5	Proposal: "local labor regulation" to be replaced by national regulation.
577	6.8.5	Usul : local labour regulation diganti national regulation
578	6.8.5	Repetition of indicator requirements for this indicator has also been regulated in indicator 6.8.1

#	Indicator	Comment (English)
579	6.8.5	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
580	6.8.5	Emphasizing the implementation of best practice in the recruitment process and payment of wages
581	6.8.5	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
582	6.8.5	Proposal: local labor regulation replaced by national regulation
583	6.8.5	Proposal: local labor regulation replaced by national regulation
584	6.8.5	Emphasizing the implementation of best practice in the recruitment process and payment of wages
585	6.8.5	"Proposal: Procedural note deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate this statement under the guidelines and submit to respective national interpretations for further definition. Indicator 6.8.8 deleted /no need, because it's set in indicator 6.8.1 (6.8.8 repetition 6.8.1)."
586	6.8.5	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1). IGC Letter on 6 October 2022: Propose to include this statement under guidance and leave it to the respective national interpretations to further define this.
587	6.8.5	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary
588	6.8.5	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
589	6.8.5	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).

#	Indicator	Comment (English)
590	6.8.5	"Proposal: Procedural note deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate this statement under the guidelines and submit to respective national interpretations for further definition. Indicator 6.8.8 deleted /no need, because it's set in indicator 6.8.1 (6.8.8 repetition 6.8.1)."
591	6.8.5	"Needs to be examined Proposal for revision: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in the work agreement"
592	6.8.5	Emphasizing the implementation of best practice in the recruitment process and payment of wages
593	6.8.5	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
594	6.8.5	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
595	6.8.5	Emphasizing the implementation of best practice in the recruitment process and payment of wages
596	6.8.5	Proposal: local labor regulation replaced by national regulation
597	6.8.5	"Review at least once a year instead of 2 times a year Revision suggestion: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness."
598	6.8.5	"Proposal: Procedural note deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate this statement under the guidelines and submit to respective national interpretations for further definition. Indicator 6.8.8 deleted /no need, because it's set in indicator 6.8.1 (6.8.8 repetition 6.8.1)."
599	6.8.5	"Needs to be examined Proposal for revision: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in the work agreement"
600	6.8.5	Emphasizing the implementation of best practice in the recruitment process and payment of wages
601	6.8.5	Proposal: local labor regulation replaced by national regulation
602	6.8.5	Proposal: local labor regulation replaced by national regulation
603	6.8.5	"Proposal: Procedural note deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate this statement under the guidelines and submit to respective national interpretations for further definition. Indicator 6.8.8 deleted /no need, because it's set in indicator 6.8.1 (6.8.8 repetition 6.8.1)."

#	Indicator	Comment (English)
604	6.8.5	Emphasizing the implementation of best practice in the recruitment process and payment of wages
605	6.8.5	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
606	6.8.5	Proposal: local labor regulation replaced by national regulation
607	6.8.5	Adding indicators to criterion 6.7: 1) Add "Unit certification fulfills specific rights of women workers, as stipulated in the national regulation or above". Note: example of the rights: menstruation leave, maternity leave, caregivers leave. 2) Add "Women workers who are bread winners, due to any cause, shall receive equal wages and benefits with men workers, without discrimination"
608	6.8.5	Proposal: editorial change to: No children may be in areas designated as hazardous areas by the unit of certification.
609	6.8.5	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
610	6.8.6	FONAP task force: this indicator should be upgraded to a critical indicator C, since it qualifies as a form of forced labor
611	6.8.7	FONAP task force: this indicator should be upgraded to a critical indicator C, since it qualifies as a form of forced labor
612	6.8.7	For line 6.8.7, key actions for freedom of movement can be found in IOM's Migrant Worker Guidelines for Employers, page 39: https://publications.iom.int/books/migrant-worker-guidelines-employers
613	6.8.7	Proposed to add :and shall be aligned with the health and safety protocol by the regulation where the UoC operates.
614	6.8.7	Proposal: local labor regulation replaced by national regulation
615	6.8.8	Procedural note: NI should not be allowed to include exceptions to the definition of the recruitment fees – P&C definition should prevail.
616	6.8.8	HRSS- Propose to provide for categories of exceptions to Related Costs that may be borne by workers. Please refer to the ILO Global Business Network on Forced Labour - "Definitions of recruitment fees and related costs by initiatives in relation to the adopted ILO Definition of Recruitment fees and related costs" for examples of recruitment fees and recruitment costs (link: https://drive.google.com/file/d/154TGsLgaWyVf-4YtK6DDzotPTnSu3eNR/view?usp=sharing)

#	Indicator	Comment (English)
617	6.8.8	<p>HRSS- To replace 'reimbursement' with 'repayment'.</p> <p>Proposed rewording: Workers shall not be required to pay any recruitment fees, related costs and illegitimate, undisclosed, and unreasonable costs to obtain or retain employment. These fees and costs shall not be collected directly or indirectly, including through deductions from wages and/or benefits.</p> <p>The Unit of Certification shall have a process in place to identify whether fees have been paid by workers, and to repay workers where such recruitment fees and related costs are found to be paid. Repayment shall be conducted in a timely manner from the date of discovery of worker paid fees, with the total timeframe from calculation of payments till final payment not exceeding 9 months.</p> <p>All workers currently employed and all those formerly employed at least to the date of endorsement of the 2023 Principles and Criteria shall be repaid.</p> <p>PROCEDURAL NOTE</p> <p>The repayment of recruitment fees should follow national laws or applicable international laws until a guidance is developed by RSPO.</p>
618	6.8.8	[Jakarta Consultation W/S, 6 Dec 2022] 6.8.8 suggest to remove the entire procedural note. Reimbursement to be done on actual cost incurred based on policy and procedure of UoC.
619	6.8.8	We do not agree to remove the procedural note as it helps to guide the UoC, but agree to it being amended. Agree that reimbursement should be done on actual cost incurred by the worker, but we recommend it is not based on the policy and procedure of the UoC as there must be consistency across RSPO UoC
620	6.8.8	Can the guideline and benchmark of repayment amount officially endorsed before RSPO 2023 is endorsed or the amount based on the verification performed by the respective UoC? We must not put the cart in front of the horse as it may lead misinterpretation and confusion when come to audits by CBs.
621	6.8.8	<p>Please see: IRIS Standard, Principle 1 Prohibition of recruitment fees and related costs to migrant workers: https://iris.iom.int/iris-standard</p> <p>IOM's Guidance Note - Recruitment Fees and Costs supports employers of migrant workers in understanding ILO's definition of recruitment fees and related costs, identifying potential recruitment fees and related costs that may be incurred during the labour migration process and determining a transparent and sustainable price for recruitment with labour recruiters: https://publications.iom.int/books/migrant-worker-guidelines-employers-guidance-note-recruitment-fees-and-related-costs</p>

#	Indicator	Comment (English)
622	6.8.8	<p>There are two problems with this Indicator:</p> <ol style="list-style-type: none"> 1. All payments made by workers need to be documented. So CB auditor will spend more time checking these documents presented by the Unit of certification. 2. It should be put as prevention measures and not sanction. The UC company has a process in place to prevent workers from paying. Check the indicator 2.2.2. I strongly suggest to add here paragraph saying: The certification unit must not charge workers any type of commission or bribe when they apply for a job or aspire to a higher position, new position or simply to win the job.
623	6.8.8	<ol style="list-style-type: none"> 1. Will all producers able to live up to this requirement of reimbursement for all active workers? 2. Is this referring to active workers as of November 2018 (includes the workers who have joined before November 2018 but left the UoC after November 2018) or any workers who have recruited after November 2018? The second part is unclear. We wish to reiterate that this new requirement will severely cut-out many producers who are unable to live up to this requirement. On a fair and pragmatic ground, we would suggest to change it to reimburse the migrant workers who have paid recruitment costs after November 2018
624	6.8.8	The principle is that all active workers - regardless what date they were hired- should be reimbursed.
625	6.8.8	Active workers as of when shall be clearly defined. As per RSPO MYNI 2019, there shall be no retrospective reimbursement of recruitment fee and related costs. However if we wish to go for repayment now, the only possible way is active workers as of endorsement date of RSPO 2023 (*provided that all RSPO growers could agree on this as this involves strong financial commitments).
626	6.8.8	It will be a challenge for the UoC to identify the recruitment fees or related costs as those fees might be charged at the village level where even the recruiters/agents were not aware of. All the identification shall be supported by evidence (e.g., receipt/payment record) before the reimbursement to be made. It is not so logic if the reimbursement to be made solely based on the complaints from workers
627	6.8.8	Why must be Impactt guideline? Will this be done via a shared responsibility concept where other actors in the supply chain also share the cost with the producers to reimburse the above-mentioned cost? This is a complex topic and it is impossible for a medium or even large grower to easily investigate and develop a repayment plan without a deep and clear understanding on ILO requirements and complexity of recruitment journey. Pending the RSPO guideline, how should the producers being audited against this indicator if they are lack of capacity and resources to perform internal investigation and repayment plan. How detail will the RSPO guideline, specify the repayment amount for each recruitment corridors under each nationality? All these must be made crystal clear before we can move on to decide whether to accept or object this indicator. Failing which, it will fail the key objectives of the current P&C review i.e ensuring auditability and applicability.
628	6.8.8	Provide link to: Impactt Principles and Guidelines for the Repayment of Migrant Worker Recruitment Fees and Related Costs. It is unclear what this means , therefore we cannot comment and whether this is adequate.

#	Indicator	Comment (English)
629	6.8.8	HRSS- Propose to provide for categories of exceptions of Related Costs that may be borne by workers. Please refer to the ILO Global Business Network on Forced Labour -Definitions of recruitment fees and related costs by initiatives in relation to the adopted ILO Definition of Recruitment fees and related costs
630	6.8.8	The principle is that no costs or fees should be born by workers, the employer must bear all costs.
631	6.8.8	The proposition of mandating all RSPO growers to reimburse all active workers as per the endorsement date of P&C 2023 will beyond doubt not only lead to an exodus of growers from the RSPO but also discourage new growers from joining RSPO.
632	6.8.8	There is lack of guidance for growers to implement this indicator, resulting in debate and lack of action. Technical committee could look into providing a detailed procedural note, until then here is a suggested text: PROCEDURAL NOTE The RSPO shall develop an informational guidance document to support Unit of Certification to remediate recruitment fees: including how to investigate recruitment fees and costs paid by workers, understand who is eligible for repayment, calculate the repayment amount, timeline of repayment, engage and communicate with workers, and verify payment. All active employees at the date of discovery of fees being paid via audits, reports, or other channels such as external grievances, will be eligible for repayment. The unit of certification shall make a good faith effort to locate and reimburse retrospectively the former employees who were active at the date of discovery but no longer active by the time of repayment. The timeline for repayment of worker paid recruitment fees and related costs shall be made immediately and no longer than six months from the date of discovery.
633	6.8.8	Emphasizing the implementation of best practice in the recruitment process and payment of wages
634	6.8.8	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
635	6.8.8	Emphasizes the implementation of best practices in the recruitment process and payment of wages
636	6.8.8	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
637	6.8.8	Proposal: local labor regulation replaced by national regulation
638	6.8.8	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).

#	Indicator	Comment (English)
639	6.8.8	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
640	6.8.8	Emphasizing the implementation of best practice in the recruitment process and payment of wages
641	6.8.8	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
642	6.8.8	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
643	6.8.8	"Proposal: Procedural note deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate this statement under the guidelines and submit to respective national interpretations for further definition. Indicator 6.8.8 deleted /no need, because it's set in indicator 6.8.1 (6.8.8 repetition 6.8.1)."
644	6.8.8	Proposal: Emphasize the implementation of best practice in the recruitment process and payment of wages.
645	6.8.8	PROPOSAL: Indicator 6.8.8 is deleted/not necessary, because the same provisions have been mentioned in indicator 6.8.1 (so 6.8.8 is a repetition or duplication of 6.8.1).
646	6.8.8	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
647	6.8.8	Need to check HR
648	6.8.8	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
649	6.8.8	Proposed to change: Penalty provisions are permitted if agreed in the work agreement
650	6.8.8	Proposal: Local Labor Regulation replaced by National Regulation.
651	6.8.8	Emphasizing the implementation of best practice in the recruitment process and payment of wages
652	6.8.8	Emphasizing the implementation of best practice in the recruitment process and payment of wages
653	6.8.8	Proposal 1: Removing military service providers Proposal 2: Keeping generic but will be discussed at INA NI

#	Indicator	Comment (English)
654	6.8.8	"Proposal: Procedural note deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate this statement under the guidelines and submit to respective national interpretations for further definition. Indicator 6.8.8 deleted /no need, because it's set in indicator 6.8.1 (6.8.8 repetition 6.8.1)."
655	6.8.8	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
656	6.8.8	Proposal: local labor regulation replaced by national regulation
657	6.8.8	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
658	6.8.8	Proposal: local labor regulation replaced by national regulation
659	6.8.8	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 removed/no need, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1)
660	6.8.8	"Needs to be examined Proposal for revision: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in the work agreement"
661	6.8.8	- Reimbursement of costs is carried out on time from the date of payment by workers, with a total span of time and calculation of payments until the final payment is not more than 9 months out of sync - Reimbursement from the company for the cost of reimbursing costs incurred by workers
662	6.8.8	Proposed revision: The Certification Unit is obliged to develop and implement procedures for remediation of child work practices if it is found that children work at the location in accordance with applicable regulations
663	6.8.8	Proposal: local labor regulation replaced by national regulation
664	6.8.8	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
665	6.8.8	Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in the work agreement

#	Indicator	Comment (English)
666	6.8.8	Procedural note deleted because the indicator is clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
667	6.8.8	Suggestion: Procedural notes are deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate these statements under the guidelines and submit to individual national interpretations for further definition. Indicator 6.8.8 is deleted / unnecessary, because it has been set on indicator 6.8.1 (6.8.8 repetition of 6.8.1).
668	6.8.8	Emphasizing the implementation of best practice in the recruitment process and payment of wages
669	6.8.8	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
670	6.8.8	local labor regulation replaced by national regulation
671	6.8.8	6.8.8 Orient the indicator to: The certification unit must have a process to prevent the occurrence of illegitimate contracting fees and incorporate processes to investigate and remedy those cases in which a situation of this type is evidenced, acting in accordance with to the national legislation of the country or that applies locally
672	6.8.9	FONAP task force: 6.8.9 should be consolidated within indicator 6.8.8
673	6.8.9	FONAP task force: this indicator should be upgraded to a critical indicator C, since it qualifies as a form of forced labor
674	6.8.9	On 6.8.9.: FONAP task force: 6.8.9 should be consolidated within indicator 6.8.8.
675	6.8.9	[Jakarta Consultation W/S, 6 Dec 2022] 6.8.9 add 'if any' The Unit of Certification shall have ... due diligence, if any, on ...
676	6.8.9	Proposal: “local labor regulation” to be replaced by national regulation.
677	6.8.10	6.8.10: FONAP task force: this indicator is repeated and should be deleted.
678	6.8.10	[Jakarta Consultation W/S, 6 Dec 2022] 6.8.10 provide clear guidance on how and what is remediation for forced labour.
679	6.9	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
680	6.9.1	Key actions for safe, decent and respectful work environment can be found in IOM's Migrant Worker Guidelines for Employers, page 34: https://publications.iom.int/books/migrant-worker-guidelines-employers
681	6.9.1	All workers shall be protected by social security, at the minimum, to protect them from working accident, disability, and pension”
682	6.9.1	FONAP task force: rather than a OHS policies and procedures, this shall be called an OHS program

#	Indicator	Comment (English)
683	6.9.1	Proposal: Deleted because the requirements are already in indicator 6.9.3
684	6.9.1	Conduct a review at least once a year, not 2 times a year. Proposed revision 6.9.5: The Unit of Certification must review the Health and Safety Plan at least once a year to monitor its effectiveness.
685	6.9.2	a separate *Health and Safety (H&S) Committee* for their mills and estates comprised of management and worker representatives, including representatives of recognised unions, unless otherwise specified by law or if workers are not unionized.
686	6.9.2	In coordination with the gender committee to align specific H&S risks for women including sexual harassment
687	6.9.2	HRRS - Propose to italise H&S Committee as it is defined in Annex 1.
688	6.9.2	FONAP task force: indicator clause v) should be treated separately, since it requires special training and skills. Unless the H&S committee members are fully trained and know how to enforce these safe pesticide management measures. The indicator appears overloaded with details also.
689	6.9.2	Proposal: Deleted because the requirements are already in indicator 6.9.3
690	6.9.2	6.9.2 (C) The constitution, organization and function of the bipartite occupational health and safety committees must be established and governed according to the applicable national legislation, for Guatemala it is the ministerial agreement 23-2017 Manual of constitution, organization and operation of the bipartite occupational health and safety committees.
691	6.9.2	For Guatemala, the two-party OHS committees are established according to Ministerial Agreement 23-2017 Issued by the Ministry of Labor and Social Welfare (MINTRAB), indicating that it can be implemented by company or company name. Therefore we must carry out this compliance with national legislation.
692	6.9.3	Lack of elaboration on the term "separate" hazard identification, risk assessment and risk control to be conducted by the UoC. Justification on the impact of pesticides to human health will be based on SDS, unless gender-specific impacts was mentioned in it.
693	6.9.3	FONAP task force: this indicator leaves too much room for interpretation and should be clearly specified in terms of elements to be covered and how to mitigate the risks with relevant practices.
694	6.9.4	FONAP task force: this indicator leaves too much room for interpretation and should be clearly specified in terms of risk mitigation practices and elements.
695	6.9.4	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
696	6.9.4	6.9.5 Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
697	6.9.4	Proposal: Deleted because the requirements are already in indicator 6.9.3
698	6.9.4	Removed because the requirement is already in indicator 6.9.3

#	Indicator	Comment (English)
699	6.9.4	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
700	6.9.4	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
701	6.9.4	Input is in the form of adding redactions to the "occupational health and safety" section in indicator 6.9.1 (K): On occupational health and safety, to add "All workers shall be protected by social security, at the minimum, to protect them from working accidents, disability, and pension"
702	6.9.4	"Review at least once a year instead of 2 times a year Revision suggestion: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness."
703	6.9.4	"Review at least once a year instead of 2 times a year Revision suggestion: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness."
704	6.9.4	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
705	6.9.4	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
706	6.9.4	Proposal: Deleted because the requirements are already in indicator 6.9.3
707	6.9.4	"Review at least once a year instead of 2 times a year Revision suggestion: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness."
708	6.9.4	Proposal: Deleted because the requirements are already in indicator 6.9.3
709	6.9.4	Proposal: Deleted because the requirements are already in indicator 6.9.3
710	6.9.4	"Review at least once a year instead of 2 times a year Revision suggestion: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness."
711	6.9.4	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
712	6.9.4	Suggestion: Removing waste management provisions should be a company KPI because they are irrelevant to the objectives of the criteria and indicators.
713	6.9.4	Proposal: Removed because the requirements are already in indicator 6.9.3
714	6.9.4	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
715	6.9.4	Proposal: Deleted because the requirements are already in indicator 6.9.3
716	6.9.4	Proposed Indicator 6.9.4 is deleted because the same provision has been stipulated in 6.9.3, resulting in duplication.

#	Indicator	Comment (English)
717	6.9.4	Proposal: Deleted because the requirements are already in indicator 6.9.3
718	6.9.4	"Review at least once a year instead of 2 times a year Revision suggestion: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness."
719	6.9.4	Proposal: Deleted because the requirements are already in indicator 6.9.3
720	6.9.4	Proposal: Deleted because the requirements are already in indicator 6.9.3
721	6.9.4	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
722	6.9.4	Proposal: Deleted because the requirements are already in indicator 6.9.3
723	6.9.4	Conduct a review at least once a year, not 2 times a year. Proposed revision: The Unit of Certification must review the Health and Safety Plan at least once a year to monitor its effectiveness.
724	6.9.4	Proposal: Deleted because the requirements are already in indicator 6.9.3
725	6.9.4	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
726	6.9.4	Proposal: Deleted because the requirements are already in indicator 6.9.3
727	6.9.4	HIRARC is reviewed once a year as part of a management review (not twice a year)
728	6.9.4	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
729	6.9.4	Social security for all workers (including migrants) in each country, every worker must be protected by K3 and PAK (Occupational Diseases)
730	6.9.4	"Needs to be examined Proposal for revision: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in the work agreement"
731	6.9.4	Proposed revision: All overtime work must be voluntary and in accordance with national regulations. The total working hours must provide adequate breaks and rest periods as specified in national regulations, including at least 24 consecutive hours of rest every 7 days.
732	6.9.4	Needs to be checked Proposed revisions: Workers should have the right to apply for work and to resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if agreed in a work agreement
733	6.9.4	"Proposal: Procedural note deleted because the indicators are clear. Guidance regarding Refunds of Recruitment Fees and Fees by the RSPO is not necessary. Additional suggestions: Incorporate this statement under the guidelines and submit to respective national interpretations for further definition. Indicator 6.8.8 deleted /no need, because it's set in indicator 6.8.1 (6.8.8 repetition 6.8.1)."
734	6.9.4	Emphasizing the implementation of best practice in the recruitment process and payment of wages

#	Indicator	Comment (English)
735	6.9.5	OSH plan to be reviewed once a year is adequate and will it really impactful to be reviewed twice a year compared to once a year? Most importantly, we have quarterly OSH meeting to discuss various safety related matter, trainings and accident cases and review of HIRARC (if necessary).
736	6.9.5	FONAP task force: more impactful would be to rather inspect the implementation of the OHS measures and review their effect on accident rates and work time losses.
737	6.9.5	Proposal: Deleted because the requirements are already in indicator 6.9.3
738	6.9.5	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
739	6.9.5	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
740	6.9.5	Proposal: Deleted because the requirements are already in indicator 6.9.3
741	6.9.5	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
742	6.9.5	Proposal: Deleted because the requirements are already in indicator 6.9.3
743	6.9.5	Proposal: Deleted because the requirements are already in indicator 6.9.3
744	6.9.5	Proposal: Deleted because the requirements are already in indicator 6.9.3
745	6.9.5	Proposal: Deleted because the requirements are already in indicator 6.9.3
746	6.9.5	"Review at least once a year instead of 2 times a year Revision suggestion: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness."
747	6.9.5	Proposal for Improvement of Indicator 6.9.5 becomes: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
748	6.9.5	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
749	6.9.5	Proposal: Deleted because the requirements are already in indicator 6.9.3
750	6.9.5	Proposal: Deleted because the requirements are already in indicator 6.9.3
751	6.9.5	"Review at least once a year instead of 2 times a year Revision suggestion: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness."
752	6.9.5	Proposal: Deleted because the requirements are already in indicator 6.9.3
753	6.9.5	Proposal 6.9.4 : Deleted because the requirements are already in indicator 6.9.3
754	6.9.5	Proposal: Deleted because the requirements are already in indicator 6.9.3
755	6.9.5	Proposal: Deleted because the requirements are already in indicator 6.9.3

#	Indicator	Comment (English)
756	6.9.5	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
757	6.9.5	Not indicator 6.10.3 but 6.9.3, plus (if needed)
758	6.9.5	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness.
759	6.9.5	Proposal: Deleted because the requirements are already in indicator 6.9.3
760	6.9.5	"Review at least once a year instead of 2 times a year Revision suggestion: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness."
761	6.9.5	This indicator has been included in hazard identification, risk assessment and control as mentioned in 6.9.3, therefore indicator 6.9.4 should be deleted
762	6.9.5	Proposal: Deleted because the requirements are already in indicator 6.9.3
763	6.9.5	No need because it is already in indicator 6.9.3
764	6.9.5	
765	6.9.5	Proposal: Editorial changes to: Workers must have the right to apply for work and resign freely, with notification, as stipulated in the employment contract. Penalty provisions can only be enforced if it has been agreed in the work agreement.
766	6.9.5	Proposal: local labor regulation replaced by national regulation
767	6.9.5	Emphasizing the implementation of best practice in the recruitment process and payment of wages
768	6.9.6	FONAP task force: Delete the first phrase. It is repetitive.
769	6.9.7	"FONAP task force: this indicator is mixing too many elements. There should be one separate indicator about PPE for pesticide applications which specifies the PPE elements per activity (mixing, applying, cleaning containers). Toilets in the field are stolen in Latin America. This requirement seems to be unrealistic."
770	6.9.7	> Propose 2 indicators: (i) supply of PPE (ii) sanitation facilities
771	6.9.7	[Abidjan, 13 Dec 2022] 6.9.7 Requirement on toilet should be separated from this indicator. This indicator should be focused on PPE only.
772	6.9.7	Indicator 6.9.7 for PPE should be separate from the new indicator of sanitation facilities.
773	6.9.7	For the NEW INDICATOR, IOM strongly recommends that this indicator is gender-responsive and indicates that women workers are provided with separate safe sanitation facilities.
774	6.9.7	To define or delete the word 'quality' and add 'physical' size of the worker.
775	6.9.7	For the new indicator, to define or make reference to any guideline/legislation on suitable and sufficient sanitation facilities.
776	6.9.7	HRSS- Propose to explicitly mentions '....gender sensitive toilet in the field' . This can be missing in poorer countries and it is important for all workers especially, for women during menstruation and pregnancy times.

#	Indicator	Comment (English)
777	6.9.7	This is not a practical thing to bring on both. However, workers can be encourage to use open holes on the ground (dig holes and cover after defecation). The unit of certification can not build toilet say every 200m or a KM. there will not be readily available water. The UoC can have at each muster area or zone a functional toilet with good hygiene and water
778	6.9.7	proposed to add :within reasonable reach, based on UoC assessment, including toilets in the field. It is important for every UoC prepare an analysis / assessment on this topic and to consider the aspects that will impact the needs of the toilets in the field, such as: the range, distance to toilets, number of workers, size of plantations and etc.
779	6.9.7	[Jakarta Consultation W/S, 6 Dec 2022] 6.9.7 - removed 'including toilets in the field' and proposed rewordings as following: Workers shall be provided suitable and sufficient sanitation facilities, within reasonable reach, in accordance with policy and SOP of the Unit of Certification.
780	6.9.7	It is ridiculous to have toilet in the oil palm field. We should leave it to the UoC to conduct an assessment to evaluate the need to have toilet in the field. We must look at the practicality on this in long term eg. maintenance and hygiene of toilet and most importantly, will male workers really use it in view of moving around the large fields. If we speak about female workers, this come back to the assessment above as we are getting fewer female workers in the field where general workers (female) prefer to go back home during break time.
781	6.9.7	This is not practical considering plantation sizes and consideration of hygienic provisions/risks that come with it.
782	6.9.7	[Abidjan, 13 Dec 2022] 6.9.7 be clear on 'if there is a need for replacement' - who determined when?
783	6.9.7	Toilets in the field for >500 Ha producers is impractical and has not been informed by needs analysis. It is not as if workers are not allowed toilet breaks or management does not transport workers back to centralized facilities when requested. An oil palm plantation is not similiar to that of manufacturing facilities.
784	6.9.7	1. [NEW INDICATOR] mentioned that the 'workers shall be provided suitable and sufficient sanitation facilities, within reasonable reach, including toilets in the field.' It is not practical to provide toilets in the field. Toilets in an isolated place in the fields are prone to become a place that may be associated with unlawful activity (e.g., drug addict, sexual immorality, etc.) 2. The new indicator introduced does not parallel with criteria 6.9 'The UoC ensures that the working environment under its control is safe, employs safe working practices and is committed to occupational health and safety of its workers'. More elaboration is needed on how providing toilets in field can promote safe working environment and safe working practice. we would suggest to rephrase the indicator by removing the clause of 'within reasonable reach, including toilets in the field'.
785	6.9.7	"Proposal to remove the sentence ""Paid sick leave must be given if time off is taken due to illness or injury"" The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear "
786	6.9.7	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult

#	Indicator	Comment (English)
787	6.9.7	- Removed a new indicator related to the Requirement that toilets be provided in the field removed because handling waste is difficult. - Removed this new indicator because sanitation facilities have been covered in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
788	6.9.7	"Proposal to delete a new indicator related to Requirements for toilets to be provided in the field was removed because handling waste is difficult. Additional suggestion: Removing this indicator because sanitation facilities have been included in indicator 6.2.2. Regarding toilets in the field, we propose to conduct a further study because it is not practical on current oil palm plantation operations in Indonesia."
789	6.9.7	6.9.9 Suggestion: add the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Proposed editorial changes to: i) Formation of an Emergency Response Team trained in the field and other operations.
790	6.9.7	Proposal to remove the sentence "Paid sick leave must be given if vacation time is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear
791	6.9.7	6.9.7 Proposal: delete the new indicator related to the Requirement for toilets to be provided in the field removed because handling the waste is difficult. Additional suggestion: Remove this new indicator because sanitation facilities have been covered in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
792	6.9.7	"Proposal to delete a new indicator related to Requirements for toilets to be provided in the field was removed because handling waste is difficult. Additional suggestion: Removing this indicator because sanitation facilities have been included in indicator 6.2.2. Regarding toilets in the field, we propose to conduct a further study because it is not practical on current oil palm plantation operations in Indonesia.
793	6.9.7	6.9.9. the sentence "this plan includes:" ; changed to: "Emergency response plan includes the risk of an emergency that has the potential to occur according to the identification made".
794	6.9.7	Proposal to remove the sentence "Paid sick leave must be given if vacation time is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear
795	6.9.7	Proposal to add the word or to point "i") so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.

#	Indicator	Comment (English)
796	6.9.7	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
797	6.9.7	6.9.7 Proposal: remove the new indicator namely "toilet sanitation in the field". Toilet sanitation is more feasible for factory/mill areas but difficult for field/plantation areas. This is because toilet sanitation in the field is difficult to monitor and is feared to be a place that is not wanted by all parties. In addition, it is difficult to maintain because of its location in the middle of the garden. Sanitation facilities will still be provided to workers by giving permission to the foreman and will be delivered to sanitation facilities in residential areas adjacent to the work location.
798	6.9.7	The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.
799	6.9.7	The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.
800	6.9.7	The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.
801	6.9.7	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
802	6.9.7	The addition of sanitation in the field should need to be reviewed because besides being difficult in handling the waste, it also needs special attention because of the difficulty of supervision so that it is at risk/prone to becoming a place for sexual harassment to occur.
803	6.9.7	"Proposal to remove the sentence ""Paid sick leave must be given if time off is taken due to illness or injury"" The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear "
804	6.9.7	The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.
805	6.9.7	6.9.10 Work accidents that cause lost work time (Lost Time Injury) and cause death (fatality) must be provided for accident investigations and follow-up recommendations, so that accidents do not recur
806	6.9.7	The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.

#	Indicator	Comment (English)
807	6.9.7	Proposal to remove the sentence "Paid sick leave must be given if vacation time is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear
808	6.9.7	"The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Becomes: i) Formation of an Emergency Response Team that is trained in the field or other operations."
809	6.9.7	"The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Becomes: i) Formation of an Emergency Response Team that is trained in the field or other operations."
810	6.9.7	
811	6.9.7	The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.
812	6.9.7	Suggestion: add the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Proposed editorial changes to: i) Formation of an Emergency Response Team trained in the field and other operations.
813	6.9.7	"Proposal to delete a new indicator related to Requirements for toilets to be provided in the field was removed because handling waste is difficult. Additional suggestion: Removing this indicator because sanitation facilities have been included in indicator 6.2.2. Regarding toilets in the field, we propose to conduct a further study because it is not practical on current oil palm plantation operations in Indonesia."
814	6.9.7	Suggestion: add the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Proposed editorial changes to: i) Formation of an Emergency Response Team trained in the field and other operations.
815	6.9.7	"Proposal to remove the sentence ""Paid sick leave must be given if time off is taken due to illness or injury"" The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear "
816	6.9.7	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
817	6.9.7	"The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Becomes: i) Formation of an Emergency Response Team that is trained in the field or other operations."

#	Indicator	Comment (English)
818	6.9.7	Proposal to remove the sentence "Paid sick leave must be given if vacation time is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear
819	6.9.7	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
820	6.9.7	The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.
821	6.9.7	"The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult."
822	6.9.7	The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.
823	6.9.7	Suggestion: 6.9.5 implementation of a review at least once a year
824	6.9.7	Add regular medical check ups
825	6.9.7	Proposal: Deleted because the requirements are already in indicator 6.9.3
826	6.9.7	6.9.7 The indicator must be focused on complying with the national legislation of each country related to health and safety in work areas; also that it includes that each productive unit can identify if it is economically viable to provide these services or that a plan for the implementation of sanitary services and the reasonable distance from them within the productive area be proposed by the RSPO
827	6.9.8	FONAP task force: the wording of this indicator should be revised.
828	6.9.8	Key actions for health care and social protection can be found in IOM's Migrant Worker Guidelines for Employers, page 41: https://publications.iom.int/books/migrant-worker-guidelines-employers
829	6.9.8	HRSS- How is this going to be audited? Is access determined by providing transport to medical facilities? What is the distinction between "local medical services" and "local medical service providers"?
830	6.9.8	Proposed rewordings: "All workers shall have contact details and access to the nearest available medical facilities. In the event there are no easily accessible medical facilities, the unit of certification shall ensure that workers are provided with access to medical service providers. Medical provisions shall be made available and accessible to workers at the Unit of Certification for medical emergencies. Costs incurred from work-related incidents leading to injury or sickness, as well as medical check-ups applicable to specific jobs (eg. pesticide application, loud machinery, etc), shall be covered in accordance with national law or by the unit of certification where national law does not offer protection. Paid sick leave shall be accorded where time off is taken due to illness or injuries."

#	Indicator	Comment (English)
831	6.9.8	[Jakarta Consultation W/S, 6 Dec 2022] 6.9.8 Paid sick leave - is mandatory by law and definitely is to be provided. Please provide clarity on 'time-off' this is not something practice or well-known in Indonesia context.
832	6.9.8	[Abidjan, 13 Dec 2022] 6.9.8 Remove 'In the event that there are no easily available medical facilities'.
833	6.9.8	Previously (P&C 2018) stated medical surveillance for pesticide operators was needed. Now it does not state this specifically. To ensure that pesticide operators do have annual check ups, it may be best to state this explicitly.
834	6.9.8	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
835	6.9.8	"The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Becomes: i) Formation of an Emergency Response Team that is trained in the field or other operations."
836	6.9.8	The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.
837	6.9.8	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
838	6.9.8	Proposal to remove the sentence "Paid sick leave must be given if vacation time is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear
839	6.9.8	"Proposal to remove the sentence ""Paid sick leave must be given if time off is taken due to illness or injury"" The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear ".
840	6.9.8	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
841	6.9.8	"The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Becomes: i) Formation of an Emergency Response Team that is trained in the field or other operations."

#	Indicator	Comment (English)
842	6.9.8	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
843	6.9.8	Proposal to remove the sentence "Paid sick leave must be given if vacation time is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear
844	6.9.8	Proposed improvement of Indicator 6.9.8: remove the sentence "Paid sick leave must be given if time off is taken due to illness or injury." in other indicators.
845	6.9.8	The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.
846	6.9.8	Proposal to remove new indicator 6.9.7 related to Requirements for toilets to be provided in the field...seems to be forced to be included...not considering how the waste is handled where there is no vendor in the remote area that handles toilet waste in the remote area. It's different in Europe and America where it's available. Additional suggestion: Remove this new indicator because sanitation facilities have been covered in indicator 6.2.2. Regarding toilets in the field, they are already available at the Plantation Office and employees' homes which are located not far away.. not practical in the current oil palm plantation operations in Indonesia.
847	6.9.8	"The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Becomes: i) Formation of an Emergency Response Team that is trained in the field or other operations."
848	6.9.8	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
849	6.9.8	There is no basis for setting a review of 2 times a year. It should just be submitted to the company's procedures regarding the review of the emergency response work program that has been prepared by the company
850	6.9.8	"Proposal to remove the sentence ""Paid sick leave must be given if time off is taken due to illness or injury"" The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear "
851	6.9.8	Proposal to remove the sentence "Paid sick leave must be given if vacation time is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear

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852	6.9.8	"Proposal to remove the sentence ""Paid sick leave must be given if time off is taken due to illness or injury"" The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear "
853	6.9.8	Suggestion: remove the new indicator related to the Requirement for toilets to be provided in the field to be removed because handling the waste is difficult. Additional suggestion: Remove this new indicator because sanitation facilities have been covered in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
854	6.9.8	"The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Becomes: i) Formation of an Emergency Response Team that is trained in the field or other operations."
855	6.9.8	6.9.7 Personal protective equipment (PPE) must comply with the job risk specification and must be provided free of charge
856	6.9.8	Suggestion: remove the sentence "Paid sick leave must be given if time off is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear
857	6.9.8	"Proposal to delete a new indicator related to Requirements for toilets to be provided in the field was removed because handling waste is difficult. Additional suggestion: Removing this indicator because sanitation facilities have been included in indicator 6.2.2. Regarding toilets in the field, we propose to conduct a further study because it is not practical on current oil palm plantation operations in Indonesia."
858	6.9.8	Proposal to remove the sentence "Paid sick leave must be given if vacation time is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear
859	6.9.8	Proposed revision: The Unit of Certification must review the Health and Safety Plan at least once a year to monitor its effectiveness.
860	6.9.8	"The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Becomes: i) Formation of an Emergency Response Team that is trained in the field or other operations."
861	6.9.8	Suggestion: add the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response proposed editorial changes to: i) Formation of an Emergency Response Team that is trained in the field or other operations.
862	6.9.8	The requirement for toilets to be provided in the field was removed because handling the waste was difficult.
863	6.9.8	The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.

#	Indicator	Comment (English)
864	6.9.8	The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.
865	6.9.8	6.9.8. The sentence for workers given a contact is changed to workers knowing the location of the nearest medical service.
866	6.9.8	Proposal to remove the sentence "Paid sick leave must be given if vacation time is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear
867	6.9.8	Proposal: Removed because the requirements are already in indicator 6.9.3
868	6.9.8	Proposal: Deleted because the requirements are already in indicator 6.9.3
869	6.9.8	Implementation of review at least once a year instead of 2 times a year Proposed revision: The Certification Unit must review the Health and Safety Plan at least once a year to monitor its effectiveness
870	6.9.9	Established and made available serve the similar meaning. Suggest to rephrase as "An ERP shall be made available and socialised to the workers in the language understood by the workers."
871	6.9.9	[Jakarta Consultation W/S, 6 Dec 2022] 6.9.9 To include, Emergency Response Plan and ERT (ER team) to be developed or established in accordance with risk identified by UoC.
872	6.9.9	Is it so impactful to be reviewed twice annually versus once a year? It is not practical to impose high level of bureaucracy on documentation review which is sufficient for once a year. Most important is the effectiveness of delivering the message to the workers and implementation on the ground. Please change to "reviewed once a year".
873	6.9.9	FONAP task force: See observations on 6.9.2. UoC don't necessarily need a plan for this but rather should focus directly on the compliance of indicators i), ii) or iii). Clause 6.9.9.iii) is already covered by indicator 6.9.10.
874	6.9.9	"Proposal to remove the sentence ""Paid sick leave must be given if time off is taken due to illness or injury"" The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear "
875	6.9.9	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
876	6.9.9	The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.
877	6.9.9	Proposal to remove the sentence "Paid sick leave must be given if vacation time is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear

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878	6.9.9	The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.
879	6.9.9	Proposal to remove the sentence "Paid sick leave must be given if vacation time is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear
880	6.9.9	The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Become: i) Formation of an Emergency Response Team that is trained in the field and other operations.
881	6.9.9	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
882	6.9.9	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
883	6.9.9	Proposals [improving Indicator 6.9.9 point j to become: i) Formation of an Emergency Response Team that is trained in the field and other operations.
884	6.9.9	Implementation of toilet procurement in the field is something that is difficult, because of the sedentary nature of work. This is especially related to the handling of its waste. It is recommended this toilet requirement be removed
885	6.9.9	Proposal to remove the sentence "Paid sick leave must be given if vacation time is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear
886	6.9.9	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
887	6.9.9	Proposal to remove the sentence "Paid sick leave must be given if vacation time is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear

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888	6.9.9	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
889	6.9.9	Suggestion: remove the sentence "Paid sick leave must be given if time off is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear
890	6.9.9	Proposal to remove the sentence "Paid sick leave must be given if vacation time is taken due to illness or injury." The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear
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895	6.9.9	"Proposal to remove the sentence ""Paid sick leave must be given if time off is taken due to illness or injury"" The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear "
896	6.9.9	"Proposal to delete a new indicator related to Requirements for toilets to be provided in the field was removed because handling waste is difficult. Additional suggestion: Removing this indicator because sanitation facilities have been included in indicator 6.2.2. Regarding toilets in the field, we propose to conduct a further study because it is not practical on current oil palm plantation operations in Indonesia.

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904	6.9.9	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
905	6.9.9	The proposal to remove the new indicator related to the requirement for toilets to be provided in the field was removed because handling the waste is difficult. Additional suggestion: Remove this indicator because sanitation facilities are included in indicator 6.2.2. Regarding toilets in the field, we propose to carry out a further study as it is impractical in the current oil palm plantation operations in Indonesia.
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909	6.9.9	"The proposal adds the word or to point i) so that there is only an emergency response team, there is no need to specify other types of emergency response. Becomes: i) Formation of an Emergency Response Team that is trained in the field or other operations."
910	6.9.9	"Proposal to delete a new indicator related to Requirements for toilets to be provided in the field was removed because handling waste is difficult. Additional suggestion: Removing this indicator because sanitation facilities have been included in indicator 6.2.2. Regarding toilets in the field, we propose to conduct a further study because it is not practical on current oil palm plantation operations in Indonesia."
911	6.9.9	In general, the description of the requirements in the indicators in criterion 6.9 is too detailed. It is recommended to make the indicator requirements simpler. The rest can be arranged in more detail in the guide
912	6.9.9	Proposed revision: The Unit of Certification must review the Health and Safety Plan at least once a year to monitor its effectiveness.
913	6.9.9	Proposed revision: The Unit of Certification must review the Health and Safety Plan at least once a year to monitor its effectiveness.
914	6.9.10	LTA should be stated to be by 200,000 to avoid confusion
915	6.9.10	"Proposal to remove the sentence ""Paid sick leave must be given if time off is taken due to illness or injury"" The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear "
916	6.9.10	"Proposal to remove the sentence ""Paid sick leave must be given if time off is taken due to illness or injury"" The indicator should be more on access to medical facilities, while for paid leave it should not be included because related to remuneration has been discussed in other principles and the sentence is also not clear "

#	Indicator	Comment (English)
1	Principle 7	<p>In 2018, the RSPO strengthened its certification standard via principle 7 to prohibit deforestation, new development on peatlands. These changes brought the RSPO into closer alignment with the global No Deforestation, No Peatland and No Exploitation (NDPE) benchmarks for responsible palm oil production. Rainforest Action Network recommends that the RSPO, and its members, ensures that the current review process does not weaken the standard that prohibits deforestation and peatland degradation regardless of depth after Nov 15 2018 — and therefore weaken the RSPO system. Weakening the requirements in 7.11 will result in the RSPO standards not meeting the expectations of Civil society Organizations and emerging regulations that require no deforestation-free/ NDPE verified products.</p> <p>The RSPO can demonstrate leadership via ensuring the next endorsed P & C's remain aligned with NDPE benchmarks.</p>
2	Principle 7	FONAP task force: the definition section is incomplete. BMP, ASA 1 and ASA 2, ERP, ERT, FFB, ICS, ISH, mill, plant refinery, deforestation, degradation, conversion, and UoC = Unit of Certification need to be defined and should be listed consistently (with abbreviations) in the Terms and Definitions section, amongst other terms.
3	7.1.1	FONAP task force: IPM starts with prevention and suppression of pests and diseases. Once these are present, the following step is monitoring. Based on the monitoring and the application of an economic threshold, then different least toxic control methods should be applied (biological control, cultural/manual methods in the case of weeds, less toxic pesticides with lowest environmental and human health risk profile. IPM is the most important element to avoid unnecessary pesticide use, but RSPO doesn't put sufficient emphasis on it. IPM should cover a range of critical and non-critical indicators to increase its weight. IPM significantly effects (in a positive way) the productivity and profitability of farms.
4	7.1.1	FONAP task force: IPM starts with prevention and suppression of pests and diseases. Once these are present, the following step is monitoring. Based on the monitoring and the application of an economic threshold, then different least toxic control methods should be applied (biological control, cultural/manual methods in the case of weeds, less toxic pesticides with lowest environmental and human health risk profile. IPM is the most important element to avoid unnecessary pesticide use, but RSPO doesn't put sufficient emphasis on it. IPM should cover a range of critical and non-critical indicators to increase its weight. IPM significantly effects (in a positive way) the productivity and profitability of farms.
5	7.1.1	monitor strict control' doesn't make sense, needs clarifying
6	7.1.1	FONAP task force: IPM starts with prevention and suppression of pests and diseases. Once these are present, the following step is monitoring. Based on the monitoring and the application of an economic threshold, then different least toxic control methods should be applied (biological control, cultural/manual methods in the case of weeds, less toxic pesticides with lowest environmental and human health risk profile. IPM is the most important element to avoid unnecessary pesticide use, but RSPO doesn't put sufficient emphasis on it. IPM should cover a range of critical and non-critical indicators to increase its weight. IPM significantly effects (in a positive way) the productivity and profitability of farms.
7	7.1.1	reduce' here is very open to interpretation and could encompass very different levels of effort to actually reduce pesticides - can this be narrowed down? e.g. reduced by how much, over what time frame, against what reference point?

#	Indicator	Comment (English)
8	7.1.1	Suggest To remove the wording of “KPI” 1) It is unfair for the UOC to have the KPI for IPM. Sometimes the UOC must use agrochemical to cure the pest (e.g., bagworm) which sometime are from neighboring estate which has no control. 2) Repetitive as carry the same meaning under 7.2.3
9	7.1.1	final clause - is it about minimising use, or preventing damage? it cannot be both, as minimised use still likely to cause some damage, and therefore not prevent damage entirely
10	7.1.1	Proposal: Removing the provision that PHT must be a company KPI because it is irrelevant to the objectives of the criteria and indicators
11	7.1.1	Proposal: Removing the provision that PHT must be a company KPI because it is irrelevant to the objectives of the criteria and indicators
12	7.1.1	It was suggested that the PHT provision should be a company KPI to be abolished, because this is irrelevant to the objectives of the criteria and indicators
13	7.1.1	Proposal: Removing the provision that PHT must be a company KPI because it is irrelevant to the objectives of the criteria and indicators
14	7.1.1	It is irrelevant to link KPIs with Integrated Pest Management (IPM). KPI is something related to internal performance appraisal. It is recommended that KPIs be deleted.
15	7.1.1	It is recommended that the Main Performance Index be abolished because it is irrelevant to the objectives of the criteria and indicators
16	7.1.1	Removing IPM provisions must become a company KPI because it is irrelevant to the objectives of the criteria and indicators
17	7.1.1	Suggestion: Removing the provision that PHT must be a company KPI because it is irrelevant to the objectives of the criteria and indicators.
18	7.1.1	It is better to remove the provisions of IPM to become company KPI/IKU because they are irrelevant to the objectives of the criteria and indicators.
19	7.1.1	Proposal: Removing the provision that PHT must be a company KPI because it is irrelevant to the objectives of the criteria and indicators
20	7.1.1	Proposal: Removing the provision that PHT must be a company KPI because it is irrelevant to the objectives of the criteria and indicators
21	7.1.1	Proposal: Removing the provision that PHT must be a company KPI because it is irrelevant to the objectives of the criteria and indicators
22	7.1.1	Words: Main Performance Index (IKU) deleted because there is no relationship between Integrated Pest Management and Company KPI. So that indicator 7.1.1 becomes an integrated pest control plan (IPM) implemented, monitored, and documented to avoid, or reduce the use of pesticides; and to minimize and monitor strict control of the use of biological control agents to prevent and mitigate damage to the environment.

#	Indicator	Comment (English)
23	7.1.1	Improvement of Indicator 7.1.1 Word: Key Performance Index (KPI) removed because there is no relation between Integrated Pest control and Company KPI. Proposed improvement of indicator 7.1.1 to an integrated pest control (IPM) plan is implemented, monitored, and documented to avoid, or reduce the use of pesticides; and to minimize and monitor strict control of the use of biological control agents to prevent and mitigate damage to the environment
24	7.1.1	Suggestion: Removing the provision that PHT must be a company KPI because it is irrelevant to the objectives of the criteria and indicators.
25	7.1.1	Suggestion: Removing the provision that PHT must be a company KPI because it is irrelevant to the objectives of the criteria and indicators.
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31	7.1.1	Proposal: Removing the provision that PHT must be a company KPI because it is irrelevant to the objectives of the criteria and indicators
32	7.1.2	FONAP task force: How does RSPO define "exceptional circumstances"? Pest emergency, e.g., bacteria to avoid mass propagation?
33	7.1.2	FONAP task force: How does RSPO define "exceptional circumstances"? Pest emergency, e.g., bacteria to avoid mass propagation?
34	7.1.2	FONAP task force: and what happens with the monitoring and elimination (avoidance of propagation) of existing invasive species?
35	7.1.3	Please consider that small grower cannot manage fire to control pests. This activity should be restricted to this kind of grower.
36	7.1.3	Please consider that small grower cannot manage fire to control pests. This activity should be restricted to this kind of grower.
37	7.1.3	Define "exceptional circumstances"? or National Regulation to define exceptional circumstances. + yes some guidance would be useful. Current P+C state "i.e. where no other effective methods exist, and with prior approval of government authorities" - why was this removed?
38	7.1.3	suggest editing to: prior approval from governmental authorities is obtained and there is a plan implemented and monitored, to prevent, mitigate and/or repair damage(s) from fire to the environment. also, shouldn't this plan be included in the plan mentioned in 7.1.1.? To avoid having many different plans.

#	Indicator	Comment (English)
39	7.1.3	This indicator partially corresponds to 7.1.3 of the P&C 2018. According to the ASI database, this indicator has never led to an NC.
40	7.1.3	How does RSPO define "exceptional circumstances"?
41	7.2.1	FONAP task force: this is a very weak indicator. In a nutshell, RSPO allows for any type of pesticide use, the UoC just needs to justify it. Not a professional approach and also completely inconsistent with IPM. Delete the first phrase. And, put emphasis on low-risk pesticides based on a scientifically credible categorization.
42	7.2.1	FONAP task force: this is a very weak indicator. In a nutshell, RSPO allows for any type of pesticide use, the UoC just needs to justify it. Not a professional approach and also completely inconsistent with IPM. Delete the first phrase. And, put emphasis on low-risk pesticides based on a scientifically credible categorization.
43	7.2.1	FONAP task force: this is a very weak indicator. In a nutshell, RSPO allows for any type of pesticide use, the UoC just needs to justify it. Not a professional approach and also completely inconsistent with IPM. Delete the first phrase. And, put emphasis on low-risk pesticides based on a scientifically credible categorization.
44	7.2	Concerned to see the following indicators appear to have been removed here, from current P+C: - 7.2.6 on training - 7.2.8 on container disposal - 7.2.10 on annual medical surveillance - 7.2.11 on no children, pregnant, breastfeeding women using pesticides We assume this is a mistake or that these have been incorporated elsewhere - please clarify? These are all important requirements which should not be removed
45	7.2.2	FONAP task force: lacks some important details, such as dosage, product name, active ingredient, application method.
46	7.2.2	FONAP task force: lacks some important details, such as dosage, product name, active ingredient, application method.
47	7.2.2	Definition of re-entry time? for the workers going to a sprayed field?
48	7.2.2	The documentation on "re-entry time" seems to be less beneficial. Propose to delete the word of "re-entry time".
49	7.2.2	FONAP task force: lacks some important details, such as dosage, product name, active ingredient, application method.
50	7.2.2	Lacks some important details, such as dosage, product name, active ingredient, application method.
51	7.2.2	Justifying the use of "ALL" the pesticides used seems to me an extreme that should be considered, because in Guatemala there is a regulatory body on this issue, it does not make sense that the country under its regulations allows it and even so, we have to justify the use of a product that already has an authorized use.
52	7.2.2	What is re-entry time? Where can I find re-entry time information? what if the re-entry time information is not in the product brochure or MSDS?
53	7.2.3	FONAP task force: wording needs to be improved and follow a logical order together with the previous indicators.
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#	Indicator	Comment (English)
56	7.2.3	Suggest to combine as redundant with 7.1.1
57	7.2.4	FONAP task force: How does RSPO define "exceptional circumstances"? Weeds are routinely controlled, for example.
58	7.2.4	FONAP task force: How does RSPO define "exceptional circumstances"? Weeds are routinely controlled, for example.
59	7.2.4	FONAP task force: How does RSPO define "exceptional circumstances"? Weeds are routinely controlled, for example.
60	7.2.5	FONAP task force: How does RSPO define "exceptional circumstances"? These HHPs should never be permitted on RSPO certified operations. There is no justification for it. There are sufficient lower-risk and effective pesticides available, that are non-systemic. All loopholes should be closed to avoid unmanageable harm to people and the environment. Additionally, RSPO's concept of prohibited pesticides is weak and does not contain the chronic health risk categories of GHS Ia/Ib for carcinogenic, toxic reproductive and mutagenic substances. Risks for these substances cannot even be managed with high-level PPE.
61	7.2.5	FONAP task force: How does RSPO define "exceptional circumstances"? These HHPs should never be permitted on RSPO certified operations. There is no justification for it. There are sufficient lower-risk and effective pesticides available, that are non-systemic. All loopholes should be closed to avoid unmanageable harm to people and the environment. Additionally, RSPO's concept of prohibited pesticides is weak and does not contain the chronic health risk categories of GHS Ia/Ib for carcinogenic, toxic reproductive and mutagenic substances. Risks for these substances cannot even be managed with high-level PPE.
62	7.2.5	[Abidjan, 13 Dec 2022] 7.2.5 to include sub point (f) compliance to national law and regulations, include the transition period for phasing out the usage of listed pesticides as stated within respective national law and regulations.
63	7.2.5	Propose to remove the "reported to the RSPO Secretariat prior to application", given that the CB will verify the due diligence prepared by UoC and report about it in the audit report which will be published on the RSPO website. Furthermore, this clause is not audit-able.
64	7.2.5	FONAP task force: How does RSPO define "exceptional circumstances"? These HHPs should never be permitted on RSPO certified operations. There is no justification for it. There are sufficient lower-risk and effective pesticides available, that are non-systemic. All loopholes should be closed to avoid unmanageable harm to people and the environment. Additionally, RSPO's concept of prohibited pesticides is weak and does not contain the chronic health risk categories of GHS Ia/Ib for carcinogenic, toxic reproductive and mutagenic substances. Risks for these substances cannot even be managed with high-level PPE.
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66	7.2.5	> 7.2.6 (C) is missing-Pesticides are only handled, used or applied by persons ... completed... > Old 7.2.8, 7.2.10, 7.2.11 deleted. To clarify why delete?
67	7.2.5	Proposal : Removing the obligation to report due diligence to the RSPO. Explanation: - There has never been a clear timeline from the RSPO while the decision affects operational activities. The purpose of having to report to the RSPO is also not clear

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68	7.2.5	"Proposal: Removing the obligation to report due diligence to the RSPO. Explanation: - There has never been a clear timeline from the RSPO while the decision affects operational activities. The purpose of having to report to the RSPO is also not clear"
69	7.2.5	Proposal: the obligation to report due diligence to the RSPO is abolished. Because there has never been a clear timeline from the RSPO while the decision will affect operational activities
70	7.2.5	"Proposal: Removing the obligation to report due diligence to the RSPO. Explanation: - There has never been a clear timeline from the RSPO while the decision affects operational activities. The purpose of having to report to the RSPO is also not clear"
71	7.2.5	Proposal : Removing the obligation to report due diligence to the RSPO. Explanation: - There has never been a clear timeline from the RSPO while the decision affects operational activities. The purpose of having to report to the RSPO is also not clear
72	7.2.5	Proposal : Removing the obligation to report due diligence to the RSPO. Explanation: - There has never been a clear timeline from the RSPO while the decision affects operational activities. The purpose of having to report to the RSPO is also not clear
73	7.2.5	Proposal : Removing the obligation to report due diligence to the RSPO. Explanation: There has never been a clear timeline from the RSPO while these decisions affect operational activities. The purpose of having to report to the RSPO is also not clear
74	7.2.5	Proposal : Removing the obligation to report due diligence to the RSPO. Explanation: There has never been a clear timeline from the RSPO while these decisions affect operational activities. The purpose of having to report to the RSPO is also not clear
75	7.2.5	Does the UoC have to report to the RSPO secretariat regarding use of paraquat or WHO pesticides 1A and 1B, or stockholm rotterdam pesticides? Does the UoC have to get approval from the RSPO? if so, how quickly can the RSPO respond?
76	7.2.5	Proposal : Removing the obligation to report due diligence to the RSPO. Explanation: - There has never been a clear timeline from the RSPO while the decision affects operational activities. The goal is to report to the RSPO and not clear
77	7.2.5	Proposal: Removing the obligation to report due diligence to the RSPO. Explanation: - There has never been a clear timeline from the RSPO while the decision affects operational activities. The purpose of having to report to the RSPO is also not clear
78	7.2.5	Proposals to Improve Indicators by deleting the word are reported to the RSPO Secretariat. It is not clear what feedback and benefits the UoC has to report to the RSPO secretariat regarding use of paraquat or WHO pesticides 1A and 1B, or stockholm rotterdam pesticides.
79	7.2.5	Proposal: Removing the obligation to report due diligence to the RSPO. Explanation: - There has never been a clear timeline from the RSPO while the decision affects operational activities. The purpose of having to report to the RSPO is also not clear
80	7.2.5	Proposal : Removing the obligation to report due diligence to the RSPO. Explanation: - There has never been a clear timeline from the RSPO while the decision affects operational activities. The purpose of having to report to the RSPO is also not clear
81	7.2.5	Proposal : Removing the obligation to report due diligence to the RSPO. Explanation: - There has never been a clear timeline from the RSPO while the decision affects operational activities. The purpose of having to report to the RSPO is also not clear
82	7.2.5	Proposal : Removing the obligation to report due diligence to the RSPO. Explanation: - There has never been a clear timeline from the RSPO while the decision affects operational activities. The purpose of having to report to the RSPO is also not clear
83	7.2.5	Proposal: Removing the obligation to report due diligence to the RSPO. Explanation: - There has never been a clear timeline from the RSPO while the decision affects operational activities. The purpose of having to report to the RSPO is also not clear

#	Indicator	Comment (English)
84	7.2.5	Proposal : Removing the obligation to report due diligence to the RSPO. Explanation: - There has never been a clear timeline from the RSPO while the decision affects operational activities. The purpose of having to report to the RSPO is also not clear
85	7.2.5	Removing the obligation to report due diligence to the RSPO because there is no clear timeline, while this obligation can affect operational activities. The purpose of having to report due diligence to the RSPO is also unclear/unclear.
86	7.2.5	Proposal: Removing the obligation to report due diligence to the RSPO.
87	7.2.5	Removing the obligation to report due diligence to the RSPO. Requirements for reporting obligations are unclear and potentially in the length of the reporting process and the length of response from the RSPO
88	7.2.5	Proposal : Removing the obligation to report due diligence to the RSPO. Explanation: - There has never been a clear timeline from the RSPO while the decision affects operational activities. The purpose of having to report to the RSPO is also not clear
89	7.2.6	FONAP task force: this is another weak indicator. Details need to be spelled out or a clear reference guide provided.
90	7.2.6	FONAP task force: this is another weak indicator. Details need to be spelled out or a clear reference guide provided.
91	7.2.6	FONAP task force: this is another weak indicator. Details need to be spelled out or a clear reference guide provided.
92	7.2.7	Due to the size of a small grower, aerial fumigation should be prohibited.
93	7.2.7	Practices using drones should be promoted by RSPO as sustainable practices.
94	7.2.7	FONAP task force: Once again the exceptional circumstances without definition. Risk mitigation practices for aerial spraying need to be included here.
95	7.2.7	Practices using drones should be promoted by RSPO as sustainable practices.
96	7.2.7	Due to the size of the medium grower, aerial fumigation should be prohibited.
97	7.2.7	FONAP task force: Once again the exceptional circumstances without definition. Risk mitigation practices for aerial spraying need to be included here.
98	7.2.7	Spraying using drone should not be treated as strictly as regular aerial spraying because it is more targeted and less widespread
99	7.2.7	To add, Evidence on the application with due consideration on (wind/ climate condition) to be documented. RSPO should provide some clear guidance on such application, at minimal, when application cannot take place.
100	7.2.7	Practices using drones should be promoted by RSPO as sustainable practices.
101	7.2.7	FONAP task force: Once again the exceptional circumstances without definition. Risk mitigation practices for aerial spraying need to be included here.
102	7.2.7	Suggest to follow National Regulation as minimum
103	7.2.7	If aerial spraying is maintained, the definition of exemptional circumstances should be clearly defined.
104	7.2.7	This activity should be highly restricted to drone applications; no aerial spraying is necessary unless the government requests it due to an uncontrollable pest.
105	7.2.7	Aerial spraying should be prohibited for medium and small growers. The use of drones should be allowed and sufficient.

#	Indicator	Comment (English)
106	7.2.8	I suggest improving the wording and specifying what are "recognized practices" as this is very subjective and causes auditors in audits to be very discretionary.
107	7.2.8	Suggestions: - Eliminate prohibited words. - Spraying using technology taking into account safety and health (the main narrative is made like that) Explanation: - Outdated formulation, no one has sprayed pesticides using airplanes, so this indicator can be removed. The correct formula is related to the use of technology ..safe spraying - This indicator limits the development of the use of technology because words are prohibited
108	7.2.8	Suggestions: - Eliminate prohibited words. - Spraying using technology taking into account safety and health (the main narrative is made like that) Explanation: - Outdated formulation, no one has sprayed pesticides using airplanes, so this indicator can be removed. The correct formula is related to the use of technology ..safe spraying - This indicator limits the development of the use of technology because words are prohibited
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114	7.2.8	The word "prohibited" was removed because the spraying that was carried out was not only a matter of air but was a technological development but with strict notes to consider health and safety aspects as well as environmental aspects.

#	Indicator	Comment (English)
115	7.2.8	Suggestions: - Eliminate prohibited words. - Spraying using technology taking into account safety and health (the main narrative is made like that) Explanation: - Outdated formulation, no one has sprayed pesticides using airplanes, so this indicator can be removed. The correct formula is related to the use of technology ..safe spraying - This indicator limits the development of the use of technology because words are prohibited
116	7.2.8	Suggestion: Clarify the definition of limitations regarding spraying pesticides through the air, the scope of the annex Case examples: The use of drones where the range is small with a relatively low altitude
117	7.2.8	Proposed Improvement Indicator 7.2.8: ▪ Eliminate the word "prohibited". ▪ Spraying using technology with safety and health in mind. Explanation: This indicator limits the development of the use of technology because words are prohibited ▪ the formulation is out of date, if no one is spraying pesticides using airplanes then this indicator can be deleted. The correct formula is related to the safe use of spraying technology.
118	7.2.8	Suggestions: - Eliminate prohibited words. - Spraying using technology taking into account safety and health (the main narrative is made like that) Explanation: - Outdated formulation, no one has sprayed pesticides using airplanes, so this indicator can be removed. The correct formula is related to the use of technology ..safe spraying - This indicator limits the development of the use of technology because words are prohibited
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123	7.2.8	Suggestions: - Eliminate prohibited words. - Spraying using technology taking into account safety and health (the main narrative is made like that) Explanation: - Outdated formulation, no one has sprayed pesticides using airplanes, so this indicator can be removed. The correct formula is related to the use of technology ..safe spraying - This indicator limits the development of the use of technology because words are prohibited

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124	7.2.8	Suggestions: - Eliminate prohibited words. - Spraying using technology taking into account safety and health (the main narrative is made like that) Explanation: - Outdated formulation, no one has sprayed pesticides using airplanes, so this indicator can be removed. The correct formula is related to the use of technology ..safe spraying - This indicator limits the development of the use of technology because words are prohibited
125	7.3.1	7.3.1 Clear auditing scope should be provided - especially for smallholder. There were experience that auditor auditing household waste management of SH house. Progressing indicator may be considered - as this is challenging for SH to adopt waste management immediately although with the support of miller.
126	7.3.1	These criteria should be modified to be suitable for a smallholder; Probably all his waste is managed as domestic, therefore this has to be clear so it becomes auditable.
127	7.3.1	FONAP task force: the specific actions are more impactful than developing a mere plan. An indicator about training is lacking.
128	7.3.1	FONAP task force: the specific actions are more impactful than developing a mere plan. An indicator about training is lacking.
129	7.3.1	suggestion to remove the wording of "KPI"
130	7.3.1	FONAP task force: the specific actions are more impactful than developing a mere plan. An indicator about training is lacking.
131	7.3.1	Take into account the policies and laws applicable to Guatemala in this matter. + National and local regulations are considered in the National Interpretation exercises for each country.
132	7.3.1	Proposal: Removing waste management provisions should be a company KPI because they are irrelevant to the objectives of the criteria and indicators
133	7.3.1	Proposal: Removing waste management provisions should be a company KPI because it is irrelevant to the objectives of the criteria and indicators
134	7.3.1	It is suggested that waste management provisions should be a company KPI to be abolished, because this is irrelevant to the objectives of the criteria and indicators
135	7.3.1	Proposal: Removing waste management provisions should be a company KPI because they are irrelevant to the objectives of the criteria and indicators
136	7.3.1	Proposal: Removing waste management provisions should be a company KPI because they are irrelevant to the objectives of the criteria and indicators
137	7.3.1	Suggestion: Removing the word responsible Recommendation: To change "responsible" to "According to applicable regulations" Reason: The word responsible does not have clear benchmarks (indicators). Meanwhile, in the Regulation, namely Permen LH No. 6 of 2021 has explained the procedures for B3 waste management requirements
138	7.3.1	Added no more dumping of garbage or toxic materials into rivers and others.
139	7.3.1	Proposal: Removed because the requirements are already in indicator 6.9.3

#	Indicator	Comment (English)
140	7.3.1	Suggestion: Removing waste management provisions should be a company KPI because they are irrelevant to the objectives of the criteria and indicators.
141	7.3.1	Proposal: Removing waste management provisions should be a company KPI because they are irrelevant to the objectives of the criteria and indicators
142	7.3.1	It needs to be examined, how is waste management if it is recommended to reduce landfills. Ex. Collaboration with local government or third parties
143	7.3.1	Proposal: Removing waste management provisions should be a company KPI because they are irrelevant to the objectives of the criteria and indicators
144	7.3.1	Proposal: Removing waste management provisions should be a company KPI because they are irrelevant to the objectives of the criteria and indicators
145	7.3.1	Proposal for Improvement Indicator 7.3.1 : Removing the provision that waste management must be a company KPI because it is irrelevant to the criteria and indicators.
146	7.3.1	Proposal: Removing waste management provisions should be a company KPI because they are irrelevant to the objectives of the criteria and indicators
147	7.3.1	Making corrections and not including waste management must be a company KPI because it is not in line with the criteria and indicators. Without including it in the KPI because it has become something that must be fulfilled in environmental management
148	7.3.1	Suggestion: Removing waste management provisions should be a company KPI because they are irrelevant to the objectives of the criteria and indicators.
149	7.3.1	It is irrelevant to link KPIs with waste handling. KPI is something related to internal performance appraisal. It is recommended that KPIs be deleted.
150	7.3.1	It is better to remove the provisions for waste management into company KPIs/KPIs because they are irrelevant to the objectives of the criteria and indicators.
151	7.3.1	Proposal: Removing waste management provisions should be a company KPI because they are irrelevant to the objectives of the criteria and indicators
152	7.3.1	Suggestion: Removing waste management provisions should be a company KPI because they are irrelevant to the objectives of the criteria and indicators.
153	7.3.1	Proposed revision: Monitoring of unit of certification waste management, and availability of progress notes on the action, indicating better waste management. Explanation: Requirements for reducing TPA utilization are still an obstacle, especially in remote areas because cooperation programs with other parties are still an issue
154	7.3.1	Suggestion: Removing waste management provisions should be a company KPI because they are irrelevant to the objectives of the criteria and indicators.

#	Indicator	Comment (English)
155	7.3.1	Proposed revision: Certification Unit waste management is monitored, and progress notes are available if possible.
156	7.3.1	Proposal: Removing the provision that PHT must be a company KPI because it is irrelevant to the objectives of the criteria and indicators
157	7.3.2	FONAP task force: How do you demonstrate good waste management? What are the KPIs? Reduction of volume? How would you measure it in a practical way?
158	7.3.2	Define what is landfill. In Cote d'Ivoire - landfill is often manage and governance through government programme and UoC will have no control over.
159	7.3.2	FONAP task force: How do you demonstrate good waste management? What are the KPIs? Reduction of volume? How would you measure it in a practical way?
160	7.3.2	FONAP task force: How do you demonstrate good waste management? What are the KPIs? Reduction of volume? How would you measure it in a practical way?
161	7.3.2	In some cases, landfill is the only practical option.
162	7.3.2	Seek for the clarification of “reduce the use of landfill to dispose of waste”. As we concern, this should not consider a must into the indicator for grower to comply but for future improvement
163	7.3.2	How do you demonstrate good waste management? What are the KPIs? Reduction of volume? How would you measure it in a practical way?
164	7.3.2	It needs to be examined, how is waste management if it is recommended to reduce landfills. Ex. Collaboration with local government or third parties
165	7.3.2	It is necessary to examine how waste is managed if it is recommended to reduce landfills?
166	7.3.2	It needs to be examined, how is waste management if it is recommended to reduce landfills. Ex. Collaboration with local government or third parties
167	7.3.2	It needs to be examined, how is waste management if it is recommended to reduce landfills. Ex. Collaboration with local government or third parties
168	7.3.2	Collaboration programs with other parties related to activities to reduce, reuse and recycle domestic waste are still an obstacle, especially in remote areas. Proposed revision: Certification Unit waste management is monitored, and records of the progress of the action are available.
169	7.3.2	How is waste management if it is recommended to reduce landfills? Example. Collaboration with local government or third parties.
170	7.3.2	It needs to be examined, how is waste management if it is recommended to reduce landfills. Ex. Collaboration with local government or third parties
171	7.3.2	It needs to be examined, how is waste management if it is recommended to reduce landfills. Ex. Collaboration with local government or third parties

#	Indicator	Comment (English)
172	7.3.2	Collaboration programs with other parties related to activities to reduce, reuse and recycle domestic waste are still an obstacle, especially in remote areas. Proposed revision: Certification Unit waste management is monitored, and records of the progress of the action are available.
173	7.3.2	It needs to be examined, how is waste management if it is recommended to reduce landfills. Ex. Collaboration with local government or third parties
174	7.3.2	Proposal: Removing waste management provisions should be a company KPI because they are irrelevant to the objectives of the criteria and indicators
175	7.3.2	Landfill reduction proposal was abolished. Because it depends on the support of the local government or third parties in waste control
176	7.3.2	Input is in the form of adding the phrase ". . . and the Certification Unit prepares and manages waste independently"
177	7.3.2	It is necessary to carry out further examination regarding how to manage waste if it is recommended to reduce landfills. Ex. Collaboration with local government or third parties
178	7.3.2	It needs to be examined, how is waste management if it is recommended to reduce landfills. Ex. Collaboration with local government or third parties
179	7.3.2	It needs to be examined, how is waste management if it is recommended to reduce landfills. Ex. Collaboration with local government or third parties
180	7.3.2	It needs to be examined, how is waste management if it is recommended to reduce landfills. Ex. Collaboration with local government or third parties
181	7.3.3	FONAP task force: this indicator is repetitive. An SOP is not necessary, if all your employees are trained and the actual activities are implemented.
182	7.3.3	FONAP task force: this indicator is repetitive. An SOP is not necessary, if all your employees are trained and the actual activities are implemented.
183	7.3.3	made aware of
184	7.3.3	FONAP task force: this indicator is repetitive. An SOP is not necessary, if all your employees are trained and the actual activities are implemented.
185	7.3.3	In Guatemala there are no authorized dumps for waste management.
186	7.3.3	Input in the form of editorial changes "...The intended procedure must be known and implemented by managers, workers and sub-contractors"
187	7.3.3	1) Adding phrases by making documentation and publishing to the public or multi-stakeholders through the media or bulletin boards around the Certification Unit 2) Input needs to add the phrase ". . . .is better managed within the Certification Unit environment".
188	7.3.4	FONAP task force: what are RSPO's instructions for waste disposal, if a sanitary land fill is out of reach? Burying out of reach of ground water or surface water bodies?

#	Indicator	Comment (English)
189	7.3.4	FONAP task force: what are RSPO's instructions for waste disposal, if a sanitary land fill is out of reach? Burying out of reach of ground water or surface water bodies?
190	7.3.4	FONAP task force: what are RSPO's instructions for waste disposal, if a sanitary land fill is out of reach? Burying out of reach of ground water or surface water bodies?
191	7.3.4	It is suggested that the term "fire" be replaced by "open burning" to improve the wording.
192	7.4	Concerned to see the following indicators seem to have been removed from current P+C: - 7.4 on soil fertility - 7.6 on soil surveys for site planning and new plantings Please clarify? These should not be removed from P+C + 7.4. is now 3.5 and 7.6 is now included to a certain extent in 7.4.3 and 7.4.4
193	7.4.1	Is there a clear definition of criteria or accepted reference for classifying 'fragile soils' and 'steep terrain'?
194	7.4.1	Is there a clear definition of criteria or accepted reference for classifying 'fragile soils' and 'steep terrain'?
195	7.5.1	1. Add peat map 2. The map should be geo-referenced & shapefile to be submitted together
196	7.4.1	Is there a clear definition of criteria or accepted reference for classifying 'fragile soils' and 'steep terrain'?
197	7.4.1	Is there a clear definition of criteria or accepted reference for classifying 'fragile soils' and 'steep terrain'?
198	7.4.2	FONAP task force: Option 1 is the only impactful option. The definition of extensive replanting leaves space for landslides, soil erosion, sedimentation of aquatic ecosystems and related negative environmental impacts. Needs to be a critical indicator C.
199	7.4.2	FONAP task force: Option 1 is the only impactful option. The definition of extensive replanting leaves space for landslides, soil erosion, sedimentation of aquatic ecosystems and related negative environmental impacts. Needs to be a critical indicator C.
200	7.4.2	Option 1 unless 'extensive' in Option 2 can be clearly defined.
201	7.4.2	7.4.2 what is the rational and how it is decided for the extensive planting to be defined as 25 ha? What is the scope for this 25 ha? based on HGU, title or plot?
202	7.4.2	RAN supports option 1 in 7.4.2
203	7.4.2	Support Option 2. Replanting on marginal and fragile soil shall be allowed and guided by the Company's Standard Operating Procedure (SOP) and Best Management Practices (BMP) in managing such areas.
204	7.4.2	Option 1 is not practical as this is about replanting and not new planting. We choose Option 2. Terracing and land preparation has been done for decades therefore the risk of erosion occurred in the replanting of such area is low. Furthermore, no extensive replanting has limit to 25 hectares. In term of economic viability, none of the Company will take the risk to replant the area if there is a risk of erosion.
205	7.4.2	FONAP task force: Option 1 is the only impactful option. The definition of extensive replanting leaves space for landslides, soil erosion, sedimentation of aquatic ecosystems and related negative environmental impacts. Needs to be a critical indicator C.

#	Indicator	Comment (English)
206	7.4.2	Smallholders farms entire holdings may potentially be on steep terrain, not allowing replanting or even extensive replanting may cause severe economic loss therein also discourage JA participation by small producers.
207	7.4.2	7.4.2 Option 2 is more feasible, especially company and big growers would have implemented best practices for replanting on steep terrain.
208	6.8.8	6.9.7 C. The new indicator adds the importance to have sanitary conditions for worker, however, the Unit of Certification can face dilemma: a. Following the national or country law. b. RSPO will establish the rate of toilets per group of workers to avoid contradictions or incorrect interpretations. Regarding the replacement of personal protective equipment, this will depend on the useful life of the equipment, the activity that is carried out and the proper use by the worker. The worker should not be charged for this equipment unless he makes incorrect use of it.
209	7.4.2	Suggest to follow back the indicator 7.5.2 in RSPO P&C 2018.
210	7.4.2	Option 2 is preferable. Suggest combining with 7.4.3, as requirements are the same.
211	7.4.2	Integrity Unit supports Option 1
212	7.4.2	This indicator partially corresponds to 7.5.2 and 7.5.3 of the P&C 2018. According to the ASI database, this indicator has never led to an NC.
213	7.4.2	7.4.2 Regarding the option 1: The criteria of the 2014 standard on steep slopes must be retaken. Option 1 has economic consequences because there are established plantings with soil conservation on land with steep slopes. Its non-replacement will imply losses for the producer or company. Make it clear what is meant by a steep slope (above 25 degrees??) and what is called extensive (from what area or hectares?) Option 2: this is very similar to Option 1, the difference is the word "extensive replantation"
214	7.4.2	Option 1 should be used - our view is that steep slopes should never have been planted on in first place, this is opportunity to correct that. Also consider same requirement on replanting relating to riparian areas, fragile and marginal soils, peat etc
215	7.4.2	Option 1 seems more straightforward for mill with own plantation and grower with >500ha. If Option 2 is preferred, the definition of extensive planted should be provided. Alternatively, to address concerns about impact on SH, option 2 could be applicable to SH (a definition of extensive is still needed).
216	7.4.2	Option 1 is the only impactful option. The definition of extensive replanting leaves space for landslides, soil erosion, sedimentation of aquatic ecosystems and related negative environmental impacts. Needs to be a critical indicator C.
217	7.4.2	It is recommended to indicate in the Criterion Guide a slope range internationally recognized as best practice so as not to leave the definition of "steep slope" so generic and indeterminate.
218	7.4.2	7.4.2 Maintain option 2 as described in the 2018 version, in the same way define the term "extensive replanting", which is the continuous territorial extension that it would represent.

#	Indicator	Comment (English)
219	7.4.2	The proposal uses Option 2 but needs to clarify the definition of extensive and needs to be reviewed for the maximum area of the replanting area on steep land to be more than 25 Ha (because generally replanting will be more than that area). Additional suggestions: Maintaining RSPO P&C 2018: No extensive replanting on steep terrain. Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas.
220	7.4.2	The proposal uses Option 2 but needs to clarify the definition of extensive and needs to be reviewed for the maximum area of the replanting area on steep land to be more than 25 Ha (because generally replanting will be more than that area). Additional suggestions: Maintaining RSPO P&C 2018: No extensive replanting on steep terrain. Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas.
221	7.4.2	Additional suggestions: Maintaining RSPO P&C 2018: No extensive replanting on steep terrain. Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas.
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223	7.4.2	The proposal uses Option 2 but needs to clarify the definition of extensive and needs to be reviewed for the maximum area of the replanting area on steep land so that it is more than 25 Ha (because generally replanting will be more than that area).
224	7.5.2	Proposed to delete: resubmit every 5 years Proposal: The peat area in the Unit of Certification is mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedure on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template . Report submission is mandatory for initial certification, renewed if anything changes.
225	7.4.2	Option 2, but needs to clarify the definition of extensive and needs to be reviewed for the maximum area of the replanting area on steep land to be more than 25 Ha (generally replanting is more than 25 Ha). Still maintaining the 2018 P&C: No extensive replanting on steep terrain "Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas."
226	7.4.2	Option 2, but needs to clarify the definition of extensive and needs to be reviewed for the maximum area of the replanting area on steep land to be more than 25 Ha (generally replanting is more than 25 Ha). Still maintaining the 2018 P&C: No extensive replanting on steep terrain "Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas."

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227	7.4.2	Option 2, but needs to clarify the definition of extensive and needs to be reviewed for the maximum area of the replanting area on steep land to be more than 25 Ha (generally replanting is more than 25 Ha). Still maintaining the 2018 P&C: No extensive replanting on steep terrain "Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas."
228	7.4.2	Choose to use option 1 with input changes to the editor: No replanting of oil palm on steep slopes and carrying out revitalization/rehabilitation and not expanding land within the Unit of Certification
229	7.4.2	Option 2, but needs to clarify the definition of extensive and needs to be reviewed for the maximum area of the replanting area on steep land to be more than 25 Ha (generally replanting is more than 25 Ha). Still maintaining the 2018 P&C: No extensive replanting on steep terrain "Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas."
230	7.4.2	Option 2, but needs to clarify the definition of extensive and needs to be reviewed for the maximum area of the replanting area on steep land to be more than 25 Ha (generally replanting is more than 25 Ha). Still maintaining the 2018 P&C: No extensive replanting on steep terrain "Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas."
231	7.4.2	Agree with option 2, but need to review the maximum size of the replanting area on steep land to be more than 25 Ha.
232	7.4.2	The proposal uses Option 2 but needs to clarify the definition of extensive and needs to be reviewed for the maximum area of the replanting area on steep land so that it is more than 25 Ha (because generally replanting will be more than that area). Additional suggestions: Maintaining RSPO P&C 2018: No extensive replanting on steep terrain. Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas.
233	7.4.2	Input is a change of phrase "No new planting practices . . ." to "No practice of new planting . . ."
234	7.4.2	Proposal: use Option 2 but needs to clarify the definition of extensive and needs to be reviewed for the maximum area of the replanting area on steep land to be more than 25 Ha (because generally replanting will be more than that area). Additional suggestions: Maintaining RSPO P&C 2018: No extensive replanting on steep terrain. Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas.
235	7.4.2	The proposal uses Option 2 but needs to clarify the definition of extensive and needs to be reviewed for the maximum area of the replanting area on steep land so that it is more than 25 Ha (Because generally replanting will be more than that area). Additional suggestions: Maintaining RSPO P&C 2018: No extensive replanting on steep terrain. Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas.

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236	7.4.2	The proposal uses Option 2 but needs to clarify the definition of extensive and needs to be reviewed for the maximum area of the replanting area on steep land so that it is more than 25 Ha (because generally replanting will be more than that area). Additional suggestions: Maintaining RSPO P&C 2018: No extensive replanting on steep terrain. Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas.
237	7.4.2	Proposal: use Option 2. It is necessary to clarify the definition of extensive and to review the maximum area of the replanting area on steep land so that it is more than 25 Ha (because generally replanting will be more than that area). Additional suggestions: Maintain the same indicators in the RSPO P&C 2018: No extensive replanting on steep terrain. Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas.
238	7.4.2	Proposal: use Option 2. It is necessary to clarify the definition of extensive and to review the maximum area of the replanting area on steep land so that it is more than 25 Ha (because generally replanting will be more than that area). Additional suggestions: Maintain the same indicators in the RSPO P&C 2018: No extensive replanting on steep terrain. Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas.
239	7.4.2	Proposal: use Option 2. It is necessary to clarify the definition of extensive and to review the maximum area of the replanting area on steep land so that it is more than 25 Ha (because generally replanting will be more than that area). Additional suggestions: Maintain the same indicators in the RSPO P&C 2018: No extensive replanting on steep terrain. Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas.
240	7.4.2	Proposal: use Option 2 but needs to clarify the definition of extensive and needs to be reviewed for the maximum area of the replanting area on steep land to be more than 25 Ha (because generally replanting will be more than that area). Additional suggestions: Maintaining RSPO P&C 2018: No extensive replanting on steep terrain. Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures [SOPs] and Best Management Practices [BMPs] for managing these areas.
241	7.4.2	Proposal to use option 2 and language on indicator 7.4.2 still uses the RSPO P&C 2018. Suggestion: use Option 2 but needs to clarify the definition of extensive and needs to be reviewed for the maximum area of replanting area on steep land to be more than 25 Ha (Because generally replanting will be more of that area). Additional suggestions: Maintaining RSPO P&C 2018: No extensive replanting on steep terrain. Replanting on marginal and fragile soils should be permitted and guided by Company Standard Operating Procedures (SOP) and Best Management Practices (BMP) for managing the area.
242	7.4.3	FONAP task force: How is 'unavoidable' defined? Such a term opens all doors for abuse. The whole indicator needs rewording to be impactful. In summary, all these practices should be prohibited.

#	Indicator	Comment (English)
243	7.4.3	FONAP task force: How is 'unavoidable' defined? Such a term opens all doors for abuse. The whole indicator needs rewording to be impactful. In summary, all these practices should be prohibited.
244	7.4.3	FONAP task force: How is 'unavoidable' defined? Such a term opens all doors for abuse. The whole indicator needs rewording to be impactful. In summary, all these practices should be prohibited.
245	7.4.3	7.4.3 new planting on marginal and fragile soil should not be allowed at all.
246	7.4.3	How can a new planting be unavoidable?
247	7.4.3	We can't see what would be counted as 'unavoidable' - suggest removing this sentence entirely. We do not allow other key issues to be determined as 'unavoidable' so why should it be the case here
248	7.4.3	clarify what would qualify as "unavoidable" or remove the entire second sentence.
249	7.4.3	This indicator partially corresponds to 7.5.2 and 7.5.3 of the P&C 2018. According to the ASI database, this indicator has never led to an NC.
250	7.4.3	7.4.3 need a clear definition and/or list of what is considered marginal and fragile?
251	7.4.3	What is a steep slope? this is very subjective and audited at discretion, i suggest maximum limits be set to establish if the slope is steep or not....otherwise subjective.
252	7.4.3	It is suggested to replace the word "rivers" with "water bodies" taking into account that buffer zones are not exclusive to rivers.
253	7.5.1	"FONAP task force: Cut-off date of the new EU rules at 31 December 2020: only products that have been produced on land that has not been subject to deforestation or forest degradation after 31 December 2020 will be allowed on the Union market or to be exported."
254	7.5.1	This indicator corresponds to 7.7.1 of the P&C 2018. According to the ASI database, this indicator has never led to an NC.
255	7.5.1	The no new planting on peat regardless of depth after 15 Nov 2018 in existing and new development areas must not be changed and must apply across all categories.
256	7.5.1	suggestion to revise as follows: all peatlands are identified and managed responsibly in the UoC
257	7.5.1	The no new planting on peat regardless of depth after 15 Nov 2018 in existing and new development areas must not be changed and must apply across all categories. In 2018, the RSPO strengthened its certification standard via principle 7 to prohibit deforestation, new development on peatlands. These changes brought the RSPO into closer alignment with the global No Deforestation, No Peatland and No Exploitation (NDPE) benchmarks for responsible palm oil production. Rainforest Action Network recommends that the RSPO, and its members, ensures that the current review process does not weaken the standard that prohibits deforestation and peatland degradation regardless of depth after Nov 15 2018 — and therefore weaken the RSPO system. Weakening the requirements in 7.11 will result in the RSPO standards not meeting the expectations of Civil society Organizations and emerging regulations that require no deforestation-free/ NDPE verified products.

#	Indicator	Comment (English)
258	7.5.1	Input in the form of an offer to change the editorial: "No planting, irrigation, and canal construction on peatlands regardless of depth after 15 November 2018, both in areas that have already been planted and in areas that have already been planted or in new development areas of the Unit of Certification"
259	7.5.2	FONAP task force: The concept of sustainable intensification is missing here. It could free up space for additional set-aside areas for peat conservation.
260	7.5.2	FONAP task force: The concept of sustainable intensification is missing here. It could free up space for additional set-aside areas for peat conservation.
261	7.5.2	7.5.2 Removed the requirement of 'submission is mandatory ... every 5 years'. As the peat does not change so it is not necessary to re-submit all the same information again.
262	7.5.2	FONAP task force: The concept of sustainable intensification is missing here. It could free up space for additional set-aside areas for peat conservation.
263	7.5.2	Propose to delete the "resubmit every 5 years" requirement. It is sufficient for UoC to update when there are major changes.
264	7.5.2	That they are known, there is no palm planted on peat soils in Guatemala, from my technical criteria the issue of peat soils should be ignored, because it does not apply in Guatemala.
265	7.5.2	Proposed to delete: resubmit every 5 years Proposal: Peat areas in the Unit of Certification are mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedures on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. Report submission is mandatory for initial certification, updated if there are changes.
266	7.5.2	Proposed to delete: resubmit every 5 years Proposal: Peat areas in the Unit of Certification are mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedures on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. Report submission is mandatory for initial certification, updated if there are changes.
267	7.5.2	Proposed to delete: resubmit every 5 years Proposal: Peat areas in the Unit of Certification are mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedures on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. Report submission is mandatory for initial certification, updated if there are changes.
268	7.5.2	Proposed to delete: resubmit every 5 years Proposal: Peat areas in the Unit of Certification are mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedures on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. Report submission is mandatory for initial certification, updated if there are changes.
269	7.5.2	Sending the "Peat Inventory" report is sufficient only once and will be sent again if there are revisions. No need once every 5 years, if nothing changes.
270	7.5.2	Proposed to delete: resubmit every 5 years Proposal: Peat areas in the Unit of Certification are mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedures on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. Report submission is mandatory for initial certification, updated if there are changes.

#	Indicator	Comment (English)
271	7.5.2	Proposed to delete: resubmit every 5 years Proposal: Peat areas in the Unit of Certification are mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedures on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. Report submission is mandatory for initial certification, updated if there are changes.
272	7.5.2	Proposed to delete: resubmit every 5 years Proposal: Peat areas in the Unit of Certification are mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedures on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. Report submission is mandatory for initial certification, updated if there are changes.
273	7.5.2	Proposed improvement Indicator 7.5.2 : Removing “resubmit every 5 years” so that: Peat areas in the Unit of Certification are mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedure on Peatland Inventory for RSPO Reporting and Land Inventory Templates RSPO peat. Report submission is mandatory for initial certification, updated if there are changes.
274	7.5.2	Cannot make drainage in peat soil
275	7.5.2	Proposed to delete: resubmit every 5 years Proposal: Peat areas in the Unit of Certification are mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedures on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. Report submission is mandatory for initial certification, updated if there are changes.
276	7.5.2	Proposal: Remove the phrase “resubmit every 5 years” to read: The peat area in the Unit of Certification is mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedure on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. Report submission is mandatory for initial certification, updated if there are changes.
277	7.5.2	Input in the form of editorial changes to paragraph 2: "Submission of reports is mandatory for initial certification, updated if there are changes and sent back once a year and published"
278	7.5.2	Proposed to delete: resubmit every 5 years Proposal: Peat areas in the Unit of Certification are mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedures on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. Report submission is mandatory for initial certification, updated if there are changes.
279	7.5.2	Proposed to delete: resubmit every 5 years Proposal: Peat areas in the Unit of Certification are mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedures on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. Report submission is mandatory for initial certification, updated if there are changes.
280	7.5.2	Proposed to delete: resubmit every 5 years Proposal: Peat areas in the Unit of Certification are mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedures on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. Report submission is mandatory for initial certification, updated if there are changes.
281	7.5.2	Proposed to delete: resubmit every 5 years Proposal: Peat areas in the Unit of Certification are mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedures on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. Report submission is mandatory for initial certification, updated if there are changes.

#	Indicator	Comment (English)
282	7.5.2	Proposal: Remove the "resubmit every 5 years" so that: The peat area in the Unit of Certification is mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedure on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. Report submission is mandatory for initial certification, updated if there are changes.
283	7.5.2	It is better to remove the resubmit provision every 5 years. Proposal : - Existing peat areas in the Unit of Certification are mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedure on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. - Submission of reports is mandatory for initial certification, and updated if there are changes.
284	7.5.2	Proposed revision: Existing peat areas in the Unit of Certification are mapped, inventoried and reported to the RSPO Secretariat in accordance with the latest version of the RSPO Procedure on Peatland Inventory for RSPO Reporting and the RSPO Peatland Inventory Template. Report submission is mandatory for initial certificates, renewed as changes are made.
285	7.5.3	This requirement should not be applicable to smallholders; there is no benefit in generating documents of this kind for such a small area. This is costly and not feasible for this kind of grower
286	7.5.3	Is this a practical requirement for a medium size grower, is the grower of RSPO obtaining any benefits by this requirement? Please evaluate this requirement.
287	7.5.3	Jurisdictional guidance and reference is required
288	7.5.3	7.5.3 remove ... 'starting with an initial assessment 15 years after initial planting which can then be updated by the grower at least two years prior to the planned replanting.'
289	7.5.3	check wording of sentence at start, no clear
290	7.5.3	Concerned that the following text seems to have been removed here from equivalent (7.7.5) in 2018 P+C "The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation." - why has this been removed? Growers should still be aiming to phase out planting on peat over time
291	7.5.3	Proposal: recommendation to return to RSPO P&C 2018 drainability assessment carried out 5 years prior to replanting plan
292	7.5.3	Proposal: return to the RSPO P&C 2018 drainability assessment to be carried out 5 years before the replanting plan
293	7.5.3	Proposal: recommendation to return to RSPO P&C 2018 drainability assessment carried out 5 years prior to replanting plan
294	7.5.3	Proposals to return to the RSPO P&C 2018 drainability assessment to be carried out 5 years prior to the replanting plan
295	7.5.3	Proposal to return to the previous indicators (5 years before replanting), so that plans and programs that have been made can be implemented first
296	7.5.3	Proposal: recommendation to return to RSPO P&C 2018 drainability assessment carried out 5 years prior to replanting plan
297	7.5.3	Proposal: Return to the RSPO P&C 2018 drainability assessment carried out 5 years before the replanting plan.

#	Indicator	Comment (English)
298	7.5.3	It is necessary to add provisions regarding the time frame for reviewing the Drainability Assessment by the RSPO. Proposed revision of indicators: Drainability assessment can be carried out at least two years before the planned replanting
299	7.5.3	Proposal: recommendation to return to RSPO P&C 2018 drainability assessment carried out 5 years prior to replanting plan
300	7.5.3	(1) There is a contradiction when the UoC still has a legal permit to carry out plantation operations (for example: HGU is still valid) while replanting activities cannot be carried out in peat areas where the results of the drainability assessment stated the peat area as a no-go area for replanting. (2) It is necessary to consider the requirements in the drainability assessment procedure version 2 which is too scientific, requires time, requires human resources and ultimately requires a large amount of money to conduct surveys of peatland height and peatland thickness to obtain primary and actual data.
301	7.5.3	Proposed Improvement of indicator 7.5.3 by returning to the RSPO P&C 2018 regarding the drainability assessment carried out 5 years before the replanting plan
302	7.5.3	Editorial change: "Drainability closing done.. . (This is based on the bad consequences that are caused. For example land subsidence and fires are inevitable.
303	7.5.3	Suggestion: return to RSPO P&C 2018 drainability assessment carried out 5 years prior to replanting plan
304	7.5.3	Proposal: recommendation to return to RSPO P&C 2018 drainability assessment carried out 5 years prior to replanting plan
305	7.5.3	Proposal: recommendation to return to RSPO P&C 2018 drainability assessment carried out 5 years prior to replanting plan
306	7.5.3	Proposal: recommendation to return to RSPO P&C 2018 drainability assessment carried out 5 years prior to replanting plan
307	7.5.3	Suggestion: return to RSPO P&C 2018 drainability assessment carried out 5 years prior to replanting plan
308	7.5.3	Proposal: recommendation to return to RSPO P&C 2018 drainability assessment carried out 5 years prior to replanting plan
309	7.5.3	Proposal: Drainability assessment is carried out 5 years before the replanting plan and can be updated by the grower at least two years before the replanting plan if necessary
310	7.5.4	Should be RSPO Peat audit guidance as P&C 2018
311	7.5.4	7.5.4 - revert back to P&C 2018 wordings as below: All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.
312	7.5.4	Jurisdictional guidance and reference is required
313	7.5.4	Editor's Suggestion: All existing plantations on peat land within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands Note: Removed the mandatory reporting requirement in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during the annual audit by the CB

#	Indicator	Comment (English)
314	7.5.4	Editor's Suggestion: All existing plantations on peat land within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands Note: Removed the mandatory reporting requirement in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during the annual audit by the CB
315	7.5.4	Editor's Suggestion: All existing plantations on peat land within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands Note: Removed the mandatory reporting requirement in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during the annual audit by the CB
316	7.5.4	Editor's Suggestion: All existing plantations on peat land within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands Note: Removed the mandatory reporting requirement in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during the annual audit by the CB
317	7.5.4	Editor's Suggestion: All existing plantations on peat land within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands Note: Removed the mandatory reporting requirement in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during the annual audit by the CB
318	7.5.4	Editor's Suggestion: All existing plantations on peat land within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands Note: Removed the mandatory reporting requirement in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during the annual audit by the CB
319	7.5.4	Editor's suggestion : All existing plantations on peat lands within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands. This is proposed because it will automatically be audited during the annual audit by the CB
320	7.5.4	Editor's Suggestion: All existing plantations on peat land within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands Note: Removed the mandatory reporting requirement in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during the annual audit by the CB
321	7.5.4	The proposed Editorial changes to: All existing plantations on peat lands within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands. Note: Removed mandatory reporting requirements in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during the annual audit by the CB.

#	Indicator	Comment (English)
322	7.5.4	Editor's Suggestion: All existing plantations on peat land within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands Note: Removed the mandatory reporting requirement in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during the annual audit by the CB
323	7.5.4	Editor's Suggestion: All existing plantations on peat land within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands Note: Removed the mandatory reporting requirement in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during the annual audit by the CB
324	7.5.4	Editor's Suggestion: All existing plantations on peat land within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands Note: Removed the mandatory reporting requirement in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during the annual audit by the CB
325	7.5.4	Proposed revisions to Indicator 7.5.4 become: All existing plantations on peat land within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands. Note: Removed mandatory reporting requirements in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during an annual audit by the CB Certification Agency during Surveillance.
326	7.5.4	The proposed Editorial changes to: All existing plantations on peat lands within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands. Note: Removed mandatory reporting requirements in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during the annual audit by the CB.
327	7.5.4	Editor's Suggestion: All existing plantations on peat land within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands Note: Removed the mandatory reporting requirement in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during the annual audit by the CB
328	7.5.4	Editor's Suggestion: All existing plantations on peat land within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands Note: Removed the mandatory reporting requirement in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during the annual audit by the CB
329	7.5.4	"Editor's suggestion : All plantations on peat under Unit Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for cultivating oil palm on peatlands. Note: Removing the mandatory reporting requirement according to the RSPO peatland audit. This is proposed because will automatically be audited during the annual audit by CB."
330	7.5.4	Proposal: All existing plantations on peat within the Unit of Certification must follow the RSPO Peat Audit Guidance. Justification: The BMP is only a guide because it cannot be used for audits.

#	Indicator	Comment (English)
331	7.5.5	This requirement should be adapted to the size of the grower. Most likely, the grower will not build dams or roads or modify the landscape.
332	7.5.5	Jurisdictional guidance and reference is required
333	7.5.5	7.5.5 Third para 'Where fire for fire fighting' to be removed completely. Alternatively the sentence could be reworded into, There shall be provision for non-commercial land clearing, such as for fire fighting or prevention measures.
334	7.5.5	This language is too broad an exemption. It should be revised with constraints and references to specific provisions that must only occur after their is agreement with govt/RSPO.
335	7.5.5	This indicator corresponds to 7.7.7 of the P&C 2018. According to the ASI database, this indicator has never led to an NC.
336	7.5.5	Remove it, no peat area...
337	7.5.5	Eliminate peat soil....!!!
338	7.5.5	Suggestion: It is necessary to add the following explanation: (1) all land clearing in peat areas that are not related to UoC operations (eg government projects, facilities for public interest, etc.) should not be considered as a violation of this indicator --> the same as RSPO P&C 2018 (INA NI)
339	7.5.5	Suggestion: It is necessary to add the following explanation: (1) all land clearing in peat areas that are not related to UoC operations (eg government projects, facilities for public interest, etc.) should not be considered as a violation of this indicator --> the same as RSPO P&C 2018 (INA NI)
340	7.5.5	Editor's Suggestion: All existing plantations on peat land within the Unit of Certification must follow the latest version of the RSPO Guidelines on Best Management Practices (PPT) for oil palm cultivation on peatlands Note: Removed the mandatory reporting requirement in accordance with the RSPO peatland audit. This is proposed because it will automatically be audited during the annual audit by the CB
341	7.5.5	Suggestion: It is necessary to add the following explanation: (1) all land clearing in peat areas that are not related to UoC operations (eg government projects, facilities for public interest, etc.) should not be considered as a violation of this indicator --> the same as RSPO P&C 2018 (INA NI)
342	7.5.5	Suggestion: It is necessary to add the following explanation: (1) all land clearing in peat areas that are not related to UoC operations (eg government projects, facilities for public interest, etc.) should not be considered as a violation of this indicator --> the same as RSPO P&C 2018 (INA NI)
343	7.5.5	Suggestion: It is necessary to add the following explanation: (1) all land clearing in peat areas that are not related to UoC operations (eg government projects, facilities for public interest, etc.) should not be considered as a violation of this indicator --> the same as RSPO P&C 2018 (INA NI)

#	Indicator	Comment (English)
344	7.5.5	Suggestion: It is necessary to add the following explanation: (1) all land clearing in peat areas that are not related to UoC operations (eg government projects, facilities for public interest, etc.) should not be considered as a violation of this indicator --> the same as RSPO P&C 2018 (INA NI)
345	7.5.5	Suggestion : Remove "RSPO Guidelines" Recommendation : Change "RSPO Guidelines" to "Applicable Regulations" Reason : There are differences between RSPO guidelines regarding PPT for oil palm cultivation on peatlands and regulations in force in Indonesia. Based on Minister of Environment and Forestry No. 16 of 2017 Article 18 paragraph 2 "The groundwater level in peatlands is less than 0.4 meters below the peat surface at the compliance point". Whereas in the RSPO guidelines a good water management system on peat is about 50 - 70 cm below the surface of the peat soil.
346	7.5.5	Suggestion: It is necessary to add the following explanation: (1) all land clearing in peat areas that are not related to UoC operations (eg government projects, facilities for public interest, etc.) should not be considered as a violation of this indicator --> the same as RSPO P&C 2018 (INA NI)
347	7.5.5	Suggestion: It is necessary to add the following explanation: (1) all land clearing in peat areas that are not related to UoC operations (eg government projects, facilities for public interest, etc.) should not be considered as a violation of this indicator --> the same as RSPO P&C 2018 (INA NI)
348	7.5.5	Suggestion: It is necessary to add the following explanation: (1) all land clearing in peat areas that are not related to UoC operations (eg government projects, facilities for public interest, etc.) should not be considered as a violation of this indicator
349	7.5.5	Need to add the following explanation: (1) all land clearing in peat areas that are not related to UoC operations (eg government projects, facilities for public interest, etc.) should not be considered as a violation of this indicator --> the same as the RSPO P&C 2018 (INA NI)
350	7.5.5	Suggestion: It is necessary to add the following explanation: (1) all land clearing in peat areas that are not related to UoC operations (eg government projects, facilities for public interest, etc.) should not be considered as a violation of this indicator --> the same as RSPO P&C 2018 (INA NI)
351	7.5.5	Suggestion: It is necessary to add the following explanation: (1) all clearing of land in peat areas that are not related to UoC operations (eg government projects, facilities for public interest, etc.) should not be considered as a violation of this indicator, as in the RSPO P&C 2018 (INA NI)
352	7.5.5	Suggestion: It is necessary to add the following explanation: (1) all land clearing in peat areas that are not related to UoC operations (eg government projects, facilities for public interest, etc.) should not be considered as a violation of this indicator --> the same as RSPO P&C 2018 (INA NI)
353	7.5.5	Suggestion: It is necessary to add the following explanation: (1) all land clearing in peat areas that are not related to UoC operations (eg government projects, facilities for public interest, etc.) should not be considered as a violation of this indicator --> the same as RSPO P&C 2018 (INA NI)

#	Indicator	Comment (English)
354	7.5.5	Suggestion: It is necessary to add the following explanation: (1) all land clearing in peat areas that are not related to UoC operations (eg government projects, facilities for public interest, etc.) should not be considered as a violation of this indicator --> the same as RSPO P&C 2018 (INA-NI).
355	7.5.5	Suggestion: It is necessary to add an explanation that all land clearing in peat areas that are not related to UoC operations (eg government projects, facilities for the public interest, etc.) should not be considered a violation of this indicator, the same as the RSPO P&C 2018 (INA NI).
356	7.6.1	Is this suitable for a smallholder? The requirement should be adapted to the applicability by a smallholder if this wants to be auditable.
357	7.6.1	FONAP task force: there are some key concepts missing here: 1.) it is about rational water use; 2.) rainwater harvesting; 3.) conservation of water reservoirs and wetlands. This is another example of an indicator that should be split into several specific indicators with specific actions; instead of vaguely requesting one single water management plan. Indicator clauses i., ii. and iii. are vague and lack technical language.
358	7.6.1	FONAP task force: there are some key concepts missing here: 1.) it is about rational water use; 2.) rainwater harvesting; 3.) conservation of water reservoirs and wetlands. This is another example of an indicator that should be split into several specific indicators with specific actions; instead of vaguely requesting one single water management plan. Indicator clauses i., ii. and iii. are vague and lack technical language.
359	7.6.1	The practice of 'Manage/ treat domestic wastewater (i.e., grey water) from workers' housing before discharge to water course.' Was not practical to be done by unit of certification. Suggest to replace the wording of 'treat' to 'monitor' domestic wastewater from workers housing in accordance to national laws and regulation / prevailing legislation.
360	7.6.1	is this list stipulating minimum compulsory practices, or just providing non-compulsory examples? important distinction to be clear on
361	7.6.1	Should also refer to indicators 7.12.1 (the IMP); 7.12.4 is about monitoring
362	7.6.1	explicitly state 'communities' as well in i_, not just 'other users' - community access to clean water needs to be explicit
363	7.6.1	This indicator partially corresponds to 7.8.1a and 7.8.1b of the P&C 2018. According to the ASI database, this indicator has never led to an NC.
364	7.6.1	FONAP task force: there are some key concepts missing here: 1.) it is about rational water use; 2.) rainwater harvesting; 3.) conservation of water reservoirs and wetlands. This is another example of an indicator that should be split into several specific indicators with specific actions; instead of vaguely requesting one single water management plan. Indicator clauses i., ii. and iii. are vague and lack technical language.
365	7.6.1	On this topic: improve the wording in the sense that the gray water from the workers' homes WHICH ARE FOUND WITHIN THE FARMS will be treated before discharging it into a receiving body, since it is not necessarily a water course, it can be to another receiving body... this issue is regulated in Guatemala and there is a positive and current regulation that is applied and is of General observance.

#	Indicator	Comment (English)
366	7.6.1	Management of domestic waste is still difficult to do in estate housing related to the provision of infrastructure, housing locations that are separated and spread out, resulting in a high investment value
367	7.6.1	Input in the form of additional points: vi. Do not plant in an area 1,000 m from the beach, river or near water sources
368	7.6.2	FONAP task force: "appropriate" is vague. A minimum width for the conservation and restoration of riparian zones should be determined based on technical publications.
369	7.6.2	FONAP task force: "appropriate" is vague. A minimum width for the conservation and restoration of riparian zones should be determined based on technical publications.
370	7.6.2	Please clarify 7.6.2 (C) The BMP need to be revised where manmade drainage also need some kind of riparian or cannot be sprayed. Need more clarification on manmade drain.
371	7.6.2	Jurisdictional guidance and reference is required
372	7.6.2	Disagreed to having the buffer or riparian into the manmade drainage as this is not practical for estate operation.
373	7.6.2	FONAP task force: "appropriate" is vague. A minimum width for the conservation and restoration of riparian zones should be determined based on technical publications.
374	7.6.2	clarify wording of second paragraph
375	7.6.2	Proposed revision of indicators: Protection of riparian zones and buffer zones in the unit of certification including maintenance and restoration according to the latest version of the RSPO Guidelines for Best Management Practices in Managing and Rehabilitating Riparian Zones. Suggestion: - Paragraph 2 is deleted because an assessment that is close and according to the rules is an HCV assessment. Additional information that will be very varied and debatable which may not end in the classification of these artificial drainage channels. - Added the sentence "Adjusted to Applicable regulations (such as previous indicators), Indonesia is even more stringent"
376	7.6.2	"Proposed revision of indicators: Protection of riparian zones and buffer zones in the unit of certification including maintenance and restoration in accordance with the latest version of the RSPO Guidelines for Best Management Practices in Managing and Rehabilitating Riparian Zones. Proposal : - Paragraph 2 is deleted because the assessment is close and in accordance with the rules is an assessment HCV Additional information that will be very varied and debatable which may never end in the classification of this artificial drainage channel - Added with the sentence ""Adjusted to Applicable regulations (such as previous indicators), Indonesia is even stricter""
377	7.6.2	Proposed revision of indicators: Protection of riparian zones and buffer zones in the unit of certification including maintenance and restoration according to the latest version of the RSPO Guidelines for Best Management Practices in Managing and Rehabilitating Riparian Zones. Suggestion: - Paragraph 2 is deleted because an assessment that is close and according to the rules is an HCV assessment. Additional information that will be very varied and debatable which may not end in the classification of these artificial drainage channels. - Added the sentence "Adjusted to Applicable regulations (such as previous indicators), Indonesia is even more stringent"

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378	7.6.2	Proposed revision of indicators: Protection of riparian zones and buffer zones in the unit of certification including maintenance and restoration according to the latest version of the RSPO Guidelines for Best Management Practices in Managing and Rehabilitating Riparian Zones. Suggestion: - Paragraph 2 is deleted because an assessment that is close and according to the rules is an HCV assessment. Additional information that will be very varied and debatable which may not end in the classification of these artificial drainage channels. - Added the sentence "Adjusted to Applicable regulations (such as previous indicators), Indonesia is even more stringent"
379	7.6.2	Proposed revision of indicators: Protection of riparian zones and buffer zones in the unit of certification including maintenance and restoration according to the latest version of the RSPO Guidelines for Best Management Practices in Managing and Rehabilitating Riparian Zones. Suggestion: - Paragraph 2 is deleted because an assessment that is close and according to the rules is an HCV assessment. Additional information that will be very varied and debatable which may not end in the classification of these artificial drainage channels. - Added the sentence "Adjusted to Applicable regulations (such as previous indicators), Indonesia is even more stringent"
380	7.6.2	Proposed revision of indicators: Protection of riparian zones and buffer zones in the unit of certification including maintenance and restoration according to the latest version of the RSPO Guidelines for Best Management Practices in Managing and Rehabilitating Riparian Zones. Suggestion: - Paragraph 2 is deleted because an assessment that is close and according to the rules is an HCV assessment. Additional information that will be very varied and debatable which may not end in the classification of these artificial drainage channels. - Added the sentence "Adjusted to Applicable regulations (such as previous indicators), Indonesia is even more stringent"
381	7.6.2	Proposed revision of indicators: Protection of riparian zones and buffer zones in the unit of certification including maintenance and restoration according to the latest version of the RSPO Guidelines for Best Management Practices in Managing and Rehabilitating Riparian Zones. Suggestion: - Paragraph 2 is deleted because an assessment that is close and according to the rules is an HCV assessment. Additional information that will be very varied and debatable which may not end in the classification of these artificial drainage channels. - Added the sentence "Adjusted to Applicable regulations (such as previous indicators), Indonesia is even more stringent"
382	7.6.2	Completely omit the second paragraph on best management practices
383	7.6.2	Proposed revision of indicators: Protection of riparian zones and buffer zones in the unit of certification including maintenance and restoration in accordance with the latest version of the RSPO Guidelines for Best Management Practices in Managing and Rehabilitating Riparian Zones, and in accordance with Applicable regulations. - Paragraph 2 was deleted because an assessment that is close and according to the rules is an HCV assessment. Additional information that will be very varied and debatable which may not end in the classification of these artificial drainage channels.

#	Indicator	Comment (English)
384	7.6.2	Proposed revision of indicators: Protection of riparian zones and buffer zones in the unit of certification including maintenance and restoration according to the latest version of the RSPO Guidelines for Best Management Practices in Managing and Rehabilitating Riparian Zones. Suggestion: - Paragraph 2 is deleted because an assessment that is close and according to the rules is an HCV assessment. Additional information that will be very varied and debatable which may not end in the classification of these artificial drainage channels. - Added the sentence "Adjusted to Applicable regulations (such as previous indicators), Indonesia is even more stringent"
385	7.6.2	Indicator 7.6.2 Sentence "Best Management Practice should be revised if the man-made drainage requires riparian or spraying is not feasible. Further classification of the man-made drainage is required." just removed it because there are no regulations governing riparian in artificial drainage channels
386	7.6.2	Proposed revision of indicators: Protection of riparian zones and buffer zones in the unit of certification including maintenance and restoration according to the latest version of the RSPO Guidelines for Best Management Practices in Managing and Rehabilitating Riparian Zones. Suggestion: - Paragraph 2 is deleted because an assessment that is close and according to the rules is an HCV assessment. Additional information that will be very varied and debatable which may not end in the classification of these artificial drainage channels. - Added the sentence "Adjusted to Applicable regulations (such as previous indicators), Indonesia is even more stringent"
387	7.6.2	Suggestion : - Revision of indicators : Protection of riparian zones and buffer zones in the unit of certification including maintenance and restoration according to the latest version of the RSPO Guidelines for Best Management Practices in Managing and Rehabilitating Riparian Zones. - Paragraph 2 was deleted because the assessment was close and in accordance with the rules, is an HCV assessment - Additional information that will vary widely and be debatable in the classification of artificial drainage channels - Additional sentences ""According to applicable regulations (such as the previous indicator).
388	7.6.2	Proposed revision of indicators: Protection of riparian zones and buffer zones in the unit of certification including maintenance and restoration according to the latest version of the RSPO Guidelines for Best Management Practices in Managing and Rehabilitating Riparian Zones. Suggestion: - Paragraph 2 is deleted because an assessment that is close and according to the rules is an HCV assessment. Additional information that will be very varied and debatable which may not end in the classification of these artificial drainage channels. - Added the sentence "Adjusted to Applicable regulations (such as previous indicators), Indonesia is even more stringent"
389	7.6.2	Proposed revision of indicators: Protection of riparian zones and buffer zones in the unit of certification including maintenance and restoration according to the latest version of the RSPO Guidelines for Best Management Practices in Managing and Rehabilitating Riparian Zones. Suggestion: - Paragraph 2 is deleted because an assessment that is close and according to the rules is an HCV assessment. Additional information that will be very varied and debatable which may not end in the classification of these artificial drainage channels. - Added the sentence "Adjusted to Applicable regulations (such as previous indicators), Indonesia is even more stringent"

#	Indicator	Comment (English)
390	7.6.2	Proposed revision of indicators: Protection of riparian zones and buffer zones in the unit of certification including maintenance and restoration in accordance with the latest version of the RSPO Guidelines for Best Management Practices in Managing and Rehabilitating Riparian Zones, and in accordance with Applicable regulations. Suggestion: Paragraph 2 is deleted because an assessment that is close and according to the rules is an HCV assessment. Additional information that will be very varied and debatable which may not end in the classification of these artificial drainage channels.
391	7.6.2	The internal procedure of the UoC already mentions the minimum allowable spraying limits from the drainage edge, so there is no need to determine the reparation on the drainage edge
392	7.6.3	FONAP task force: Effluents shall not reach natural aquatic ecosystems. Methane should be captured.
393	7.6.3	why has explicit requirement to monitor Biological Oxygen Demand been removed? This should remain
394	7.6.3	The text "More clarifications are needed on artificial drainage" is included, which does not seem to belong to the editorial staff.
395	7.6.3	The public participates in monitoring the processing of liquid waste by the Certification Unit in accordance with national regulations
396	7.6.4	FONAP task force: an objective to reduce water use should be added.
397	7.7.1	+ implementation of the plan
398	7.7.1	FONAP task force: once again, a plan doesn't make it but rather concrete actions that will reduce the use of fossil fuels.
399	7.7.1	We suggest that it be stated that "A plan for phasing out the use of fossil fuels and to optimize renewable energy..." be used instead of the current language.
400	7.7.1	Not detailed enough, what is the plan for improving efficiency. In this regard, it says improving efficiency, not MINIMISING fossil fuel or phasing out fossil fuel use. This means some plantations / growers still use fossil fuel? Have to improve this criteria.
401	7.8.1	"FONAP task force: It is not realistic to date back emissions to the year 2014. And what would it be good for? FONAP task force: Cut-off date of the new EU rules at 31 December 2020: only products that have been produced on land that has not been subject to deforestation or forest degradation after 31 December 2020 will be allowed on the Union market or to be exported."
402	7.8.1	"FONAP task force: It is not realistic to date back emissions to the year 2014. And what would it be good for? FONAP task force: Cut-off date of the new EU rules at 31 December 2020: only products that have been produced on land that has not been subject to deforestation or forest degradation after 31 December 2020 will be allowed on the Union market or to be exported."
403	7.8.1	We choose Option 2. The RSPO GHG Calculator was launched in 2014 (excel sheet format) however the digitized and improvised version (Palm GHG Calculator) with corrected conversion factors was officially launched in December 2018. Therefore, it is more practical to have the evaluation of trend since 2019 instead of 2014.
404	7.8.1	Should there be penalties if this is not furnished? Should there be a minimum requirement for emission reduction along with a timeframe?
405	7.8.1	We suggest going with Option 2 (2019) due to availability of data going back to 2014 and the different versions of PalmGHG
406	7.8.1	We suggest option 1 where it possible, to give a longer-term trend. Data only going back to 2019 will be less informative

#	Indicator	Comment (English)
407	7.8.1	"FONAP task force: It is not realistic to date back emissions to the year 2014. And what would it be good for? FONAP task force: Cut-off date of the new EU rules at 31 December 2020: only products that have been produced on land that has not been subject to deforestation or forest degradation after 31 December 2020 will be allowed on the Union market or to be exported."
408	7.8.1	Should it not start from the year of certification instead of a fixed date in the past?
409	7.8.1	Option 2 is preferable.
410	7.8.1	Jurisdictional guidance and reference is required
411	7.8.1	Option 1 is better as Option 2 of 2019 might skew the data due to the disruption to the pandemic.
412	7.8.1	7.8.1. Any Unit of certification who fails to report will be penalized to respond to this commitment. The difference between both options is from the year 2014 or 2019 to study the trends of the certification unit. The more history the better to see if the improvement plan has been implemented or ignored in terms of your emissions.
413	7.8.1	Option 2 preferred to allow for level playing field of the use of PalmGHG v.4 + Option 2 is more feasible due to the applicability and availability of PalmGHG V4 in 2018.
414	7.8.1	7.8.1 Propose a clear objective of the goal to be achieved by the certification unit or that it is described that the certification unit must establish its goal to be achieved according to its policies, commitments and improvement plans, oriented towards a management of emissions and pollution prevention. It is suggested that the baseline start for each UdC from the first year of certification and that from that moment the emission trend be analyzed. + clear metric for continuous improvement must be established, especially for companies that have invested years ago in GHG reduction and that demonstrating numerical improvement will be complex, but not an improvement in Emissions Management.
	7.8.1	Option 2 is proposed - potentially look at based on certification date?
415	7.8.1	Proposal using Option 2 Additional proposal: Change the indicator to trend of GHG emissions since 2019, not 2014. For new members, the cut of date must be the same as their membership date.
416	7.8.1	Proposal using Option 2 Additional proposal: Change the indicator to trend of GHG emissions since 2019, not 2014. For new members, the cut of date must be the same as their membership date.
417	7.8.1	"Proposal using Option 2 Additional proposal: Change the indicator to trend of GHG emissions since 2019, not 2014. For new members, the cut of date must be the same as their membership date."
418	7.8.1	Proposal using Option 2 Additional proposal: Change the indicator to trend of GHG emissions since 2019, not 2014. For new members, the cut of date must be the same as their membership date.
419	7.8.1	Agree with option no 2
420	7.8.1	Agree on option 2: The emission trend since 2019 should be analyzed. Plans to reduce or minimize GHG emissions are implemented, monitored and reported through RSPO audit reports
421	7.8.1	Proposal using Option 2 Additional proposal: Change the indicator to trend of GHG emissions since 2019, not 2014. For new members, the cut of date must be the same as their membership date.

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422	7.8.1	Proposal using Option 2 Additional proposal: Change the indicator to trend of GHG emissions since 2019, not 2014. For new members, the cut of date must be the same as their membership date.
423	7.8.1	Agree with option 2
424	7.8.1	Proposal using Option 2 Additional proposal: Change the indicator to trend of GHG emissions since 2019, not 2014. For new members, the cut of date must be the same as their membership date.
425	7.8.1	Proposal using Option 2 Additional proposal: Change the indicator to trend of GHG emissions since 2019, not 2014. For new members, the cut of date must be the same as their membership date.
426	7.8.1	Proposal using Option 2 Additional proposal: Change the indicator to trend of GHG emissions since 2019, not 2014. For new members, the cut of date must be the same as their membership date.
427	7.8.1	Suggestion: use Option 2, but add For new members, the cut of date must be the same as their membership date
428	7.8.1	Addendum to indicator 7.8.1 : [option 3] Emission trends since the first RSPO certification audit shall be analyzed. Plans to reduce or minimize GHG emissions are implemented, monitored and reported through RSPO audit reports
429	7.8.1	Proposal using Option 2 Additional proposal: Change the indicator to trend of GHG emissions since 2019 instead of 2014. For new members, the cut of date must be the same as their membership date
430	7.8.1	Proposal using Option 2 Additional proposal: Change the indicator to trend of GHG emissions since 2019, not 2014. For new members, the cut of date must be the same as their membership date.
431	7.8.1	Proposal using Option 2 Additional proposal: Change the indicator to trend of GHG emissions since 2019, not 2014. For new members, the cut of date must be the same as their membership date.
432	7.8.1	Proposal: use Option 2 Additional suggestion: Change the indicator to trend of GHG emissions since 2019 instead of 2014. For new members, the cut of date must be the same as their membership date.
433	7.8.1	Suggestion using Additional Option 2: Change the indicator to trend of GHG emissions since 2019, not 2014. For new members, the cut of date must be the same as their membership date."
434	7.8.1	Proposed using option 2
	7.8.1	Cut off date/year are to be set based on availability of tool and data. Suggest to instead look at membership date
435	7.8.2	"FONAP task force: the wording and intent of this indicator are totally unclear. FONAP task force: Cut-off date of the new EU rules at 31 December 2020: only products that have been produced on land that has not been subject to deforestation or forest degradation after 31 December 2020 will be allowed on the Union market or to be exported.
436	7.8.2	"FONAP task force: the wording and intent of this indicator are totally unclear. FONAP task force: Cut-off date of the new EU rules at 31 December 2020: only products that have been produced on land that has not been subject to deforestation or forest degradation after 31 December 2020 will be allowed on the Union market or to be exported.
437	7.8.2	Jurisdictional guidance and reference is required

#	Indicator	Comment (English)
438	7.8.2	"FONAP task force: the wording and intent of this indicator are totally unclear. FONAP task force: Cut-off date of the new EU rules at 31 December 2020: only products that have been produced on land that has not been subject to deforestation or forest degradation after 31 December 2020 will be allowed on the Union market or to be exported.
439	7.8.3	FONAP task force: please, reword this indicator. It is not clear.
440	7.8.3	FONAP task force: please, reword this indicator. It is not clear.
441	7.8.3	FONAP task force: please, reword this indicator. It is not clear.
442	7.8.3	We suggest removing the language "at which they become a risk," so that the entire indicator would read "Other potential pollutants and their usage in the Unit of Certification (except for GHG) shall be identified and plans to reduce or minimize them are implemented and monitored." This new language infers that most, if not all, pollutants are risks, and should be minimized.
	7.8.3	Clarify the intent of the indicator and the definition of 'other pollutant' - what is the boundary of the scope that covered and identified as pollutant
443	7.9	change from "the managed area" to "the unit of certification"
444	7.9.1	FONAP task force: Cut-off date of the new EU rules at 31 December 2020: only products that have been produced on land that has not been subject to deforestation or forest degradation
445	7.9.1	FONAP task force: Cut-off date of the new EU rules at 31 December 2020: only products that have been produced on land that has not been subject to deforestation or forest degradation
446	7.9.1	FONAP task force: Cut-off date of the new EU rules at 31 December 2020: only products that have been produced on land that has not been subject to deforestation or forest degradation
447	7.9.1	This indicator corresponds to 7.11.1 of the P&C 2018. According to the ASI database, this indicator has never led to an NC.
448	7.9.2	I suggest improving the wording, since the nearby interested parties could use the use of fire as ancestral practices in the management of their crops, which complicates having a participation with the interested parties in prevention and control issues when in the Certification Units. Its use is prohibited, it is somewhat contradictory internally to prohibit it, but to sit down with the interested parties and talk about prevention and control, which are issues that contribute to and motivate the use of fire.
449	7.9.2	It is suggested to correct the wording of "as the participation..." to "with the participation..."
450	7.10	SEIA, as we have found with HCV5&6, will need to be considered differently at JA scale. Recommend that a 'sample' of the jurisdiction be assessed, based on risk and sensitivity analyses.
451	7.10	Why the SEIA is moved back to Principle 7? Also encompasses SIA and makes sense to have under P3 together with assessment and management related criteria.
452	7.10	It is recommended that criterion 7.10 be moved to Principle 4
453	7.10.1	FONAP task force: please, reword this indicator. It is not clear. Is it before the actual activities start? The SEIA should be conducted by an independent third party organization with technical expertise. And yes, the participatory methodology is very important.

#	Indicator	Comment (English)
454	7.10.1	FONAP task force: please, reword this indicator. It is not clear. Is it before the actual activities start? The SEIA should be conducted by an independent third party organization with technical expertise. And yes, the participatory methodology is very important.
455	7.10.1	revise from "but" to "by"
456	7.10.1	The implementation of the management plan of the SEIA should be auditable and accountable to the UoC
457	7.10.1	FONAP task force: Cut-off date of the new EU rules at 31 December 2020: only products that have been produced on land that has not been subject to deforestation or forest degradation
458	7.10.1	recommend to change "In new plantings" to "In all UoC" to include existing plantations
459	7.10.1	suggest to revise from "affected stakeholders" to "affected local communities and stakeholders" note "affected stakeholders" is not in the definitions (you have "relevant stakeholders"
460	7.10.1	suggest analyzing the use of a tool called "EISA" to identify impacts, since in Guatemala there are tools designed to identify social and environmental impacts, where specific Terms of Reference based on Law and approved by the MARN, where said impacts are identified, in such a way that in compliance with current environmental regulations, the identification of these impacts and currently the impacts identified within an EISA must be complied with, which renders one of the two meaningless. So my suggestion is, either take into account what the law in Guatemala establishes on the subject of impacts or what the RSPO establishes on this subject, remember that in the absence of national regulations, what the RSPO establishes will be taken, but in this case, the mechanisms for the identification of impacts are already regulated, so from my point of view one tool is null and void and nullifies the certainty and veracity of the other.
461	7.10.1	suggest removing the word "affected" from the wording, taking into account that the interested parties are not necessarily related to a negative impact or affectation by the development of the cultivation operation or processing plant. The "interested party" by its definition, has a close or direct relationship due to potential positive or negative impacts. Writing "affected" is directly relating it and predetermining a negative impact on the interested parties.
462	7.10.2	FONAP task force: is this referring to the operation plan for the new planting or mill? Not clear. Please, improve the wording.
463	7.10.2	FONAP task force: is this referring to the operation plan for the new planting or mill? Not clear. Please, improve the wording.
464	7.10.2	FONAP task force: is this referring to the operation plan for the new planting or mill? Not clear. Please, improve the wording.
465	7.10.2	change from "have developed" to "have been developed"
466	7.10.2	suggest to revise from "affected and interested stakeholders" to "affected local communities and stakeholders" note "affected stakeholders" and "interested stakeholders" are not in the definitions (you have "relevant stakeholders")
467	7.10.2	the explicit requirement for SEIA to be made available seems to have been removed here - this should be kept in explicitly. Our understanding is this was seen as covered under other requirements for legal documents to be made available, but a) SEIAs not always a legal requirement b) the requirement to make it available should be explicit here regardless

#	Indicator	Comment (English)
468	7.10.2	The management and monitoring plans of the certification unit are those authorized by the Ministry of Environment and Natural Resources, complying with what is established by current environmental regulations, within Decree 68-86 "Law for the protection and improvement of the environment".
469	7.10.2	"Proposed revision: The management and monitoring plan for the Certification Unit has been developed through the participation of affected and interested relevant stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations"
470	7.10.2	Proposed revision: The management and monitoring plan for the Certification Unit has been developed through the participation of affected and interested relevant stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations
471	7.10.2	Proposed revision: The management and monitoring plan for the Certification Unit has been developed through the participation of affected and interested relevant stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations
472	7.10.2	Proposed revision: The management and monitoring plan for the Certification Unit has been developed through the participation of affected and interested relevant stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations
473	7.10.2	The management and monitoring plan for the Certification Unit has been developed through the participation of affected and interested relevant stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations
474	7.10.2	Proposed revision: The management and monitoring plan for the Certification Unit has been developed through the participation of affected and interested relevant stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations
475	7.10.2	Proposed revision: The management and monitoring plan for the Certification Unit has been developed through the participation of affected and interested relevant stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations
476	7.10.2	Proposed revision: The management and monitoring plan for the Certification Unit has been developed through the participation of affected and interested relevant stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations
477	7.10.2	Proposal: Editorial changes to: The Certification Unit management and monitoring plan has been developed through the participation of relevant affected and interested stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations.

#	Indicator	Comment (English)
478	7.10.2	Proposed revision: The management and monitoring plan for the Certification Unit has been developed through the participation of affected and interested relevant stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations
479	7.10.2	Proposed revision: The management and monitoring plan for the Certification Unit has been developed through the participation of affected and interested relevant stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations
480	7.10.2	Proposed revision: The management and monitoring plan for the Certification Unit has been developed through the participation of affected and interested relevant stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations
481	7.10.2	Proposal: Improvement of Indicator 7.10.2 I to become: A Certification Unit management and monitoring plan has been developed through the participation of relevant affected and interested stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations.
482	7.10.2	Proposed revision: The management and monitoring plan for the Certification Unit has been developed through the participation of affected and interested relevant stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations
483	7.10.2	Proposed revision: The management and monitoring plan for the Certification Unit has been developed through the participation of affected and interested relevant stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations
484	7.10.2	Proposed revision: The Certification Unit management and monitoring plan has been developed through the participation of affected and interested relevant stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations.
485	7.10.2	Proposal: Editorial changes to: The Certification Unit management and monitoring plan has been developed through the participation of relevant affected and interested stakeholders, based on the findings of the SEIA Social and Environmental Impact Assessment which has been carried out in accordance with applicable regulations.
486	7.10.3	FONAP task force: the element of monitoring and evaluation of impacts is lacking here. Please, include.
487	7.10.3	FONAP task force: the element of monitoring and evaluation of impacts is lacking here. Please, include.
488	7.10.3	for consistency with definitions suggest to revise to "affected local communities"
489	7.10.3	revise to "measures"
490	7.10.3	FONAP task force: the element of monitoring and evaluation of impacts is lacking here. Please, include.
491	7.10.3	Instead of using the word "affected" "the communities present in the area of influence" should be used, taking into account that an affectation due to the development of the operation is being predetermined and the use of the word is not appropriate.

#	Indicator	Comment (English)
492	7.10.3	<p>Updates in Guatemala are regulated within article 40 of the RECSA, which establishes the cases in which the updates PROCEED and in no case are they established to be annual, taking into consideration that within the environmental instruments MUST exist the "management plans, social and environmental monitoring" so I copy verbatim what is established in that article: ARTICLE 40. Cases of origin of the update. The request for updating of environmental instruments proceeds in the following cases:</p> <p>a) At the request of the proponent, when extensions or modifications are implemented in the environmental control measures with respect to the approved environmental instrument or in those cases that the demand for resources is reduced;</p> <p>b) Derived from MARN environmental monitoring and control actions;</p> <p>c) When in the resolution of approval or subsequent resolutions, no category, surety insurance, environmental insurance and/or environmental license has been consigned and,</p> <p>d) Concluded the incidental procedure in the DCL for non-compliance with environmental commitments, when applicable.</p> <p>The DIGARN or the departmental delegations of the MARN, when appropriate, will evaluate and approve or not, the update of the environmental instrument submitted to its consideration, being able to set the category, insurance, license, environmental commitments and environmental control measures, or any other that may be necessary. as well as determine the presentation of a new environmental instrument.</p>
493	7.10.3	Proposal: it is proposed that a review of environmental and social management and monitoring be conducted once every 2 years. This is in accordance with the RSPO P&C 2018
494	7.10.3	Proposal: it is proposed that a review of environmental and social management and monitoring be conducted once every 2 years. This is in accordance with the RSPO P&C 2018
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#	Indicator	Comment (English)
501	7.10.3	Proposal: Improvement of Indicator 7.10.3 In consultation with affected communities, social and environmental management monitoring plans must be reviewed at least once every 2 years or according to applicable national regulations by including updates obtained from previous implementation. This proposal complies with the RSPO P&C 2018
502	7.10.3	Proposal: it is proposed that a review of environmental and social management and monitoring be conducted once every 2 years. This is in accordance with the RSPO P&C 2018
503	7.10.3	Proposal: it is proposed that a review of environmental and social management and monitoring be conducted once every 2 years. This is in accordance with the RSPO P&C 2018
504	7.10.3	Proposal: it is proposed that a review of environmental and social management and monitoring be conducted once every 2 years. This is in accordance with the RSPO P&C 2018
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506	7.10.3	Proposal: it is proposed that a review of environmental and social management and monitoring be conducted once every 2 years. This is in accordance with the RSPO P&C 2018
507	7.10.3	It is proposed that a review of environmental and social management and monitoring be conducted every 2 years. In accordance with RSPO P&C 2018.
508	7.10.3	it is recommended that environmental and social management and monitoring reviews be conducted once every 2 years, such as RSPO P&C 2018
509	7.11	As per other comment, the adapted procedure must remain for the use of Indigenous and local communities in HFCL in HFCC's.
510	7.11	<p>Reinstate the following in the Procedural note from the previous P&C: PROCEDURAL NOTE for 7.11: "... The RSPO also acknowledged that these 'HFCCs' urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and environmental safeguards. Hence, an adapted procedure is to be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights in HFCC.</p> <p>Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs).</p> <p>The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members . In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and publicly available."</p>

#	Indicator	Comment (English)
511	7.11	<p>In 2018, the RSPO strengthened its certification standard via principle 7 to prohibit deforestation, new development on peatlands. These changes brought the RSPO into closer alignment with the global No Deforestation, No Peatland and No Exploitation (NDPE) benchmarks for responsible palm oil production. Rainforest Action Network recommends that the RSPO, and its members, ensures that the current review process does not weaken the standard that prohibits deforestation and peatland degradation regardless of depth after Nov 15 2018 — and therefore weaken the RSPO system. Weakening the requirements in 7.11 will result in the RSPO standards not meeting the expectations of Civil society Organizations and emerging regulations that require no deforestation-free/ NDPE verified products. The RSPO can demonstrate leadership via ensuring the next endorsed P & C's remain aligned with NDPE benchmarks. Regarding the procedural note for 7.11, the exemptions to no-deforestation requirements that is offered for HFCC— and will be develop via an adapted procedure— must remain only a exemption for Indigenous Peoples and local communities with legal or customary rights. Any attempt to wider the exemption for companies of any size or category will be rejected and heavily criticized as a major backward step by the RSPO during a time of climate crisis.</p> <p>The adapted procedure must be developed via the No Deforestation Joint Steering Group (NDJSG) taskforce that was set up by the RSPO with the HCSA. The NDJSG must be adequately resourced with an experienced RSPO-appointed facilitator. The RSPO must educate its members on the work that has been undertaken by the NDJSG since 2018—and the outcomes of the consultation process undertaken and research into small scale options for palm development in a HFCCs.</p> <p>The HCSA will soon release its simplified smallholder toolkit for Indonesia. The NDJSG should review this toolkit to see if it can provide a basis for the adapted procedures for Indigenous and local communities in High Forest Cover Landscapes in High Forest Cover Countries.</p>
512	7.11	can timeline for developing this adapted procedure be given? links to guidance?
513	7.11	We welcome the addition of peatlands and other conservation areas
514	7.11	Principle 7 have covered elements about land clearing. Should there be an added principle mentioning about land usage (planting of palm trees) for low risk... and what are the implications? This especially in the case where there is palm oil development in low risk assessed areas. What are the RSPO implications when there is a land use, and how does it ascertain to the requirements of forest conservation or planet goals?
515	7.11	<p>We suggest bringing back the phrasing from 2018 P&C related to causing damage to HCVs (the values), not only HCV areas (where these are found), because protection of HCVs may require management measures are also implemented in areas surrounding the exact location of the values (HCV management areas). A good example of this are areas designated as buffers around HCVs, or corridors used by HCVS, sometimes even crossing plantation areas.</p> <p>A suggestion follows: Criterion 7.11. Land clearing conducted by the Unit of Certification does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCV), High Carbon Stock (HCS) forest, peatlands and other conservation areas.</p>

#	Indicator	Comment (English)
516	7.11	For next public consultation, please clearly lay out all of the changes between 2018 P+C and the whole of criterion 7.11. This criterion is a crucial element of the P+C but figuring out the exact changes intended here is difficult and it needs to be made more explicit to allow clear public consultation
517	7.11	Peat does not need to be specified because this criterion focuses on forest, HCV and HCS areas. If in certain cases peat is identified as forest, HCV or HCS then the conservation efforts will automatically include the peat itself
518	7.11.1	Deforestation by smaller scale producers - such as local elites that are operating illegal plantations outside concessions/areas with a land title persist in Indonesia and are FFB grown on these lands is making its way into the MassBalance supply chains of RSPO member. This sourcing of palm oil from land speculators that are defined by the RSPO as 'independent smallholders' must stop. RSPO members must ensure all FFB suppliers adhere to 7.11 and undertake spatial mapping to determine if planted areas of FFB suppliers have been cleared since Nov 2018. RAN's carbon bomb report shows an example case that the RSO must learn from ran.org/carbonbomb Supply shed wide/landscape approaches can be used to ensure full compliance by legitimate smallholders using the HCSA simplified approach.
519	7.11.1	Jurisdictional guidance and reference is required
520	7.11.1	FONAP task force: How does RSPO intend to proof land clearing since 2005, if high-resolution satellite imagery is not available for all relevant regions? Is there an HCS forest cover map available for palm oil producing countries? FONAP task force: DEFORESTATION and FOREST DEGRADATION need to be separately defined based on internationally accepted FAO definitions."
521	7.11.1	RAN's comments apply across all three categories.
522	7.11.1	FONAP task force: How does RSPO intend to proof land clearing since 2005, if high-resolution satellite imagery is not available for all relevant regions? Is there an HCS forest cover map available for palm oil producing countries? FONAP task force: DEFORESTATION and FOREST DEGRADATION need to be separately defined based on internationally accepted FAO definitions."
523	7.11.1	previous wording was better as it stated 'areas required to protect HCVs' rather than 'HCV areas', putting the emphasis on identifying which areas are protecting HCVs and then protecting them, rather than a requirement only to protect areas once they have been identified as HCV. Perhaps too much of a focus on semantics, but it does seem to change the emphasis and intention of this indicator, need to be clear that meaning is unchanged
524	7.11.1	In jurisdictional approach (JA), a procedure must be developed to assess potential compensation liability among various growers / smallholders within a jurisdictional entity (JE), when land use change analysis is conducted in accordance to RSPO LUCA Guidance Document
525	7.11.1	This should be RSPO procedure, not in the P&C material or audited by the CB.

#	Indicator	Comment (English)
526	7.11.1	The RSPO must NOT move its cut-off date for land clearing/deforestation (to 2020 or any other date later than Nov 2018), or modify its requirement to not damage HCVs and HCS forests using the High Carbon Stock Approach. 7.11.1 should also refer to the HCSA's guidance for restoration and social remediation https://highcarbonstock.org/wp-content/uploads/2022/03/HCSA-Restoration-Remediation-Guidance_V1-approved-1-Mar-2022.pdf Rainforest Action Network recommends that the RSPO, and its members, ensures that the current review process does not weaken the standard that prohibits deforestation and peatland degradation regardless of depth after Nov 15 2018 — and therefore weaken the RSPO system. Weakening the requirements in 7.11 will result in the RSPO standards not meeting the expectations of Civil society Organizations and emerging regulations that require no deforestation-free/ NDPE verified products. RAN's comments apply across all three categories.
527	7.11.1	LUCA for JA needs to be looked at- cannot just be on cash terms. Upwardly delegated to JE, land swap or commitment to increase forest cover by JA.
528	7.11.1	> 7.11.1 , which has obtained a 'PASS' status from the RSPO Secretariat – please clarify what this means? do we need to put that sentence? > Need more clarification on the RSPO Land Use Risk Identification Approach (LURI)
529	7.11.1	FONAP task force: How does RSPO intend to proof land clearing since 2005, if high-resolution satellite imagery is not available for all relevant regions? Is there an HCS forest cover map available for palm oil producing countries? FONAP task force: DEFORESTATION and FOREST DEGRADATION need to be separately defined based on internationally accepted FAO definitions."
530	7.11.1	Jurisdictional guidance and reference is required
531	7.11.1	We suggest going back to wording in P&C 2018 (same justification as suggested for the criterion 7.11): Indicator.7.11.1.C Land clearing since November 2005 has not damaged any primary forest and/or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCS forests. Potential compensation liability shall be assessed through the Land Use Change Analysis (LUCA) in accordance with the RSPO LUCA Guidance Document.
532	7.11.1	Due to the timeframes of RSPO endorsing Annexes, it is advised that the indicator should be made to read 'Approved Annex 7 should be observation at first audit year, raised to minor if not at Annex 8 at 2nd audit year and critical at 3rd audit year.' to allow for Timebound plans to be achievable. + I think they have separated what concerns identification from management and monitoring. It seems a good idea to me.
533	7.11.1	The aforementioned RSPO Guidance for the presentation of LUCA Maps should also apply to all types of small producers, including those under the umbrella of the Extractor.

#	Indicator	Comment (English)
534	7.11.1	"Proposes maintaining RSPO P&C 2018. RSPO needs to review LUCA procedures and ensure a definite time frame for review and PASS status of LUCA Explanation: RSPO decision will determine the course of operations so if there is no clear timeline commitment growers will have difficulty clearing land ."
535	7.11.1	Proposes maintaining RSPO P&C 2018. RSPO needs to review LUCA procedures and ensure a definite time frame for review and PASS status of LUCA Explanation: RSPO decision will determine the course of operations so if there is no clear timeline commitment growers will have difficulty clearing land.
536	7.11.1	Proposes maintaining RSPO P&C 2018. RSPO needs to review LUCA procedures and ensure a definite time frame for review and PASS status of LUCA Explanation: RSPO decision will determine the course of operations so if there is no clear timeline commitment growers will have difficulty clearing land .
537	7.11.1	Proposes maintaining RSPO P&C 2018. RSPO needs to review LUCA procedures and ensure a definite time frame for review and PASS status of LUCA Explanation: RSPO decision will determine the course of operations so if there is no clear timeline commitment growers will have difficulty clearing land.
538	7.11.1	Proposes maintaining RSPO P&C 2018. RSPO needs to review LUCA procedures and ensure a definite time frame for review and PASS status of LUCA Explanation: RSPO decision will determine the course of operations so if there is no clear timeline commitment growers will have difficulty clearing land.
539	7.11.1	Proposes maintaining RSPO P&C 2018. RSPO needs to review LUCA procedures and ensure a definite time frame for review and PASS status of LUCA Explanation: RSPO decision will determine the course of operations so if there is no clear timeline commitment growers will have difficulty clearing land.
540	7.11.1	Suggestion: maintain the RSPO P&C 2018. The RSPO needs to review the LUCA procedure and ensure a definite time frame for the review and PASS status of the LUCA. Explanation: RSPO decision will determine the course of operations so if there is no clear time commitment, growers will have difficulty clearing land.
541	7.11.1	Proposes maintaining RSPO P&C 2018. RSPO needs to review LUCA procedures and ensure clear and definite timelines for review and PASS status of LUCA Explanation: RSPO decision will determine the course of operations so if there is no clear timeline commitment growers will have difficulty opening land.
542	7.11.1	Proposal: Improvement of Indicator 7.11.1 by returning to the RSPO P&C 2018. RSPO for the same requirements. The RSPO should evaluate the LUCA procedure and ensure a definite time frame for the review and PASS status of the LUCA. Explanatory note: The RSPO decision will determine the operation of the certification unit so that if there is no clear time commitment for completing the LUCA review etc., the certification unit will have difficulty clearing land.
543	7.11.1	Proposes maintaining RSPO P&C 2018. RSPO needs to review LUCA procedures and ensure a definite time frame for review and PASS status of LUCA Explanation: RSPO decision will determine the course of operations so if there is no clear timeline commitment growers will have difficulty clearing land.

#	Indicator	Comment (English)
544	7.11.1	Proposes maintaining RSPO P&C 2018. RSPO needs to review LUCA procedures and ensure a definite time frame for review and PASS status of LUCA Explanation: RSPO decision will determine the course of operations so if there is no clear timeline commitment growers will have difficulty clearing land.
545	7.11.1	Proposes maintaining RSPO P&C 2018. RSPO needs to review LUCA procedures and ensure a definite time frame for review and PASS status of LUCA Explanation: RSPO decision will determine the course of operations so if there is no clear timeline commitment growers will have difficulty clearing land.
546	7.11.1	Proposes to maintain the RSPO P&C 2018 because before new land clearing is carried out, LUCA has already been checked by an external certification body so that it is sufficient without submitting it to the RSPO. will determine the course of operations so that if there is no clear time commitment, growers will have difficulty clearing land.
547	7.11.1	RSPO needs to review the LUCA procedure and ensure a definite time frame for review and PASS status of LUCA
548	7.11.1	Suggestion: maintain the RSPO P&C 2018. The RSPO needs to review the LUCA procedure and ensure a definite time frame for the review and PASS status of the LUCA. Explanation: RSPO decision will determine the course of operations so if there is no clear time commitment, growers will have difficulty clearing land.
549	7.11.1	Proposes maintaining RSPO P&C 2018. RSPO needs to review LUCA procedures and ensure a definite time frame for review and PASS status of LUCA Explanation: RSPO decision will determine the course of operations so if there is no clear timeline commitment growers will have difficulty clearing land.
550	7.11.2	Jurisdictional guidance and reference is required
551	7.11.2	FONAP task force: DEFORESTATION and FOREST DEGRADATION need to be separately defined based on internationally accepted FAO definitions.
552	7.11.2	FONAP task force: DEFORESTATION and FOREST DEGRADATION need to be separately defined based on internationally accepted FAO definitions.
553	7.11.2	7.11.2 should also refer to the CHSA's restoration and social remediation guidance as best practice https://highcarbonstock.org/wp-content/uploads/2022/03/HCSA-Restoration-Remediation-Guidance_V1-approved-1-Mar-2022.pdf
554	7.11.2	RACP for JA needs to be looked at- cannot just be on cash terms. Upwardly delegated to JE, land swap or commitment to increase forest cover by JA.

#	Indicator	Comment (English)
555	7.11.2	"FONAP task force: land clearing, degradation and conversion are all important terms and should be defined as such in the DEFINITIONS section. FONAP task force: Cut-off date of the new EU rules at 31 December 2020: only products that have been produced on land that has not been subject to deforestation or forest degradation after 31 December 2020 will be allowed on the Union market or to be exported. FONAP task force: DEFORESTATION and FOREST DEGRADATION need to be separately defined based on internationally accepted FAO definitions."
556	7.11.2	Jurisdictional guidance and reference is required
557	7.11.2	Due to the long review periods for both Annexes 7 and 8, it would be better that the Annex 7 needs to be approved by the time of the initial certification. An observation can be raised if Annex 8 is not yet validated, which could be raised to a minor non-conformity during ASA1 and a critical during ASA2 if it has not yet been resolved. The long review times currently punish the growers that have the projects already ready, but not yet validated by RSPO.
558	7.11.2	Due to the timeframes of RSPO endorsing Annexes, it is advised that the indicator should be made to read 'Approved Annex 7 should be observation at first audit year, raised to minor if not at Annex 8 at 2nd audit year and critical at 3rd audit year.' to allow for Timebound plans to be achievable.
559	7.11.2	Proposal: Adding the RACP timeline and removing the monitoring mechanism
560	7.11.2	Proposal: Adding the RACP timeline and removing the monitoring mechanism
561	7.11.2	Proposal: Adding the RACP timeline and removing the monitoring mechanism
562	7.11.2	It is recommended to return to the RSPO P&C 2018 indicators where land clearing is without HCV or HCV-HCS, then RaCP is PROCESSED. This is because it takes a long and unpredictable process until the RaCP is declared FULFILLED
563	7.11.2	Suggestion to add RACP timeline and remove monitoring mechanism.
564	7.11.2	Proposed improvement Indicator 7.11.2 : Adding the RACP timeline and removing the monitoring mechanism. This is because it has been regulated in the HCV Monitoring Management.
565	7.11.2	Proposal: Adding the RACP timeline and removing the monitoring mechanism
566	7.11.2	Proposal: Adding the RACP timeline and removing the monitoring mechanism
567	7.11.2	Proposal: Adding the RACP timeline and removing the monitoring mechanism
568	7.11.2	Proposal: Adding the RACP timeline and removing the monitoring mechanism
569	7.11.2	Proposal: Adding the RACP timeline and removing the monitoring mechanism
570	7.11.2	Proposal: Adding the RACP timeline and removing the monitoring mechanism
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572	7.11.2	Proposal: Adding the RACP timeline and removing the monitoring mechanism

#	Indicator	Comment (English)
573	7.11.3	"FONAP task force: there is a very straightforward and internationally accepted land use categorization methodology available for satellite image analysis: CORINE land cover. This together with field verification via GPS / drones provides for a much more objective and straightforward assessment method. See https://land.copernicus.eu/user-corner/technical-library/corine-land-cover-nomenclatureguidelines/docs/pdf/CLC2018_Nomenclature_illustrated_guide_20190510.pdf "
574	7.11.3	FONAP task force: there is a very straightforward and internationally accepted land use categorization methodology available for satellite image analysis: CORINE land cover. This together with field verification via GPS / drones provides for a much more objective and straightforward assessment method. See https://land.copernicus.eu/user-corner/technical-library/corine-land-cover-nomenclatureguidelines/docs/pdf/CLC2018_Nomenclature_illustrated_guide_20190510.pdf "
575	7.11.3	It should remain as it is originally, including in a more integrated manner annex 5 and the interpretation of this annex (flow chart). For medium and small businesses, the simplified AVC should be adopted.
576	7.11.3	7.11.3 to incorporate the Annex 5 and interpretation document and made clear the cut-off of each scenario.
577	7.11.3	RAN is not supportive of the text as is. the HCSA toolkit and the HCV-HCSA assessment manual shall be used to identify HCV areas and HCS forests for new developments since Nov 2018. To new P & C should retain the procedural note from P & C 2018: For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.
578	7.11.3	By adding this wording we seem to have lost the explicit overall requirement for HCV and HCS areas (except in the specific circumstances under Annex 5) to be identified by conducting an HCV-HCS integrated assessment. There is no reference at all here to how HCS is identified. These key points need to be clear in final version
579	7.11.3	Suggesting the following for mill, medium growers and smallholders: c) For already certified unit of certification with new land clearing classified as high risk in accordance to the RSPO Land Use Risk Identification Approach (LURI), the HCSA toolkit and the HCV-HCSA assessment manual shall be used to identify HCV areas and HCS forests. To retain the procedural note from P&C 2018: For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.

#	Indicator	Comment (English)
580	7.11.3	FONAP task force: there is a very straightforward and internationally accepted land use categorization methodology available for satellite image analysis: CORINE land cover. This together with field verification via GPS / drones provides for a much more objective and straightforward assessment method. See https://land.copernicus.eu/user-corner/technical-library/corine-land-cover-nomenclature-guidelines/docs/pdf/CLC2018_Nomenclature_illustrated_guide_20190510.pdf "
581	7.11.3	Some scenarios are missing, suggest to make it in line with Annex 5.
582	7.11.3	Guidance and reference are required for HCV and HCS assessment on jurisdictional scale which include non-ALS system to cater for scale, complexity and unique multi stakeholders characteristic of JA
583	7.11.3	Remove requirement for ALS for JA units with something more practical and implementable.
584	7.11.3	Long HCV-HCS mapping and review process is currently being experienced at management unit level. This issue must be addressed at jurisdictional level to make the process more acceptable to growers and smallholders
585	7.11.3	This section needs clarifying and finishing. Since guidance has already been developed on Annex 5, just refer to that document here instead of trying to list all scenarios within the indicator?

#	Indicator	Comment (English)
586	7.11.3	<p>We suggest the following alternative draft for discussion (explanation follows after):</p> <p>7.11.3.C The unit of certification planning a new land clearing after 15 November 2018 shall have an HCV-HCSA assessment report identifying HCVs and HCS Forests, published as “satisfactory” by the HCVN. The assessment must be conducted using the HCSA Toolkit and the HCV-HCSA assessment Manual. Land clearing can only commence once the NPP including the satisfactory HCV-HCSA assessment report and the Integrated Management Plan (IMP) has been approved.</p> <p>PROCEDURAL NOTE FOR 7.11.3.C</p> <p>For jurisdictional certification: A risk-based procedure for assessment and assurance will be developed by RSPO and HCVN to ensure these are proportionate (in cost and effort) to the different levels of risk within the jurisdictional unit of certification.</p> <p>TRANSITIONAL NOTE</p> <p>Applicable for the scenarios below and only until 31 December 2023 (final date for publication of satisfactory/peer reviewed assessments). From 1 January 2024, 7.11.3.C applies to all units of certification with new land clearing.</p> <p>Scenario 1. To identify HCVs and HCS Forests, any certified unit of certification planning new land clearing after 15 November 2015, where a LURI identifies risk areas, and there is an HCV assessment marked satisfactory by HCVN, shall have a Standalone HCSA assessment published by the HCSA before any new land clearing.</p> <p>Scenario 2. To identify HCVs and HCS Forests, any certified unit of certification planning new land clearing after 15 November 2015, where a LURI identifies risk areas, and where there isn’t an HCV assessment marked satisfactory by HCVN, shall have an HCV-HCSA assessment marked satisfactory by HCVN before any new land clearing.</p> <p>Scenario 3. 7.1.5.C To identify HCVs and HCS Forests, units of certification that are uncertified or planning a new land clearing after 15 November 2015, where there is an HCV assessment marked satisfactory by HCVN, and where a LURI identifies risk areas, shall have a Standalone HCSA assessment published by the HCSA before any new land clearing.</p> <p>RATIONALE FOR SUGGESTIONS</p> <ol style="list-style-type: none"> 1) Consistency with previous suggestions: revise “HCV areas...” to refer to "any area required to protect or enhance HCVs". 2) referring to satisfactory HCVN evaluation instead of referring to licensed assessors. 3) removing "other conservation areas" (these are likely identified in peat studies, EIA, soil studies, etc... not in the HCV-HCSA assessments) 4) focusing indicator on all new land clearings always requiring HCV-HCSA assessments. 5) including a transitional note for any outstanding 2018 P&C transition scenarios (if any, since there was a cut-off date for the transition) 6) including a procedural note related to "risk-based assessment and assurance" which may be relevant to jurisdictional certification (as is the case already for independent smallholders, with the use of the app).
587	7.11.3	Suggest adding “valid and sufficient” to facilitate auditing.

#	Indicator	Comment (English)
588	7.11.3	RAN is not supportive of the text as is. the HCSA toolkit and the HCV-HCSA assessment manual shall be used to identify HCV areas and HCS forests for new developments since Nov 2018. To new P & C should retain the procedural note from P & C 2018: For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.
589	7.11.3	RSPO approved assessor list is not valid anymore... A HCVRN licensed assessor cannot be the lead on a non-ALS HCV assessment, even though these are allowed. Maybe it should be stated that the licensed assessor must be in the team, but does not need to be the lead.
590	7.11.3	Proposal: Adding a LURI completion timeline c) For certified units with new land clearing in areas classified as high risk according to the RSPO Land Use Risk Identification Approach (LURI) - then an HCV Assessment is carried out by an RSPO approved assessor or a Licensed Assessor HCVN/ALS remains valid and must be followed by the HCS Assessment submitted to the HCSA
591	7.11.3	Proposal: Adding a LURI completion timeline c) For certification units that are already certified with new land clearing in areas classified as high risk in accordance with the RSPO Land Use Risk Identification Approach (LURI) - then HCV Assessment is carried out by an RSPO approved assessor or HCVN Licensed Assessor /ALS remains in effect and must be followed by the HCS Assessment submitted to the HCSA
592	7.11.3	The RSPO secretariat needs to establish clearer review steps and timelines for LURI, as well as more detail in determining who determines the status of LURI as a low or high risk area
593	7.11.3	Proposal: Adding a LURI completion timeline c) For certification units that are already certified with new land clearing in areas classified as high risk in accordance with the RSPO Land Use Risk Identification Approach (LURI) - then HCV Assessment is carried out by an RSPO approved assessor or HCVN Licensed Assessor /ALS remains in effect and must be followed by the HCS Assessment submitted to the HCSA
594	7.11.3	Proposal: Adding a LURI completion timeline Proposal: Editorial changes to: c) For certified units of certification with new land clearing in areas classified as high risk in accordance with the RSPO Land Use Risk Identification Approach (LURI) - then an HCV Assessment conducted by an assessor who approved by RSPO or HCVN/ALS Licensed Assessor remains valid and must be followed by the HCS Assessment submitted to the HCSA.
595	7.11.3	Proposal: Adding a LURI completion timeline c) For certification units that are already certified with new land clearing in areas classified as high risk in accordance with the RSPO Land Use Risk Identification Approach (LURI) - then HCV Assessment is carried out by an RSPO approved assessor or HCVN Licensed Assessor /ALS remains in effect and must be followed by the HCS Assessment submitted to the HCSA
596	7.11.3	Proposal to Improve Indicator 7.11.3 point c by: Adding the LURI completion timeline to: c) For certification units that have been certified by opening new land in areas classified as high risk in accordance with the RSPO Land Use Risk Identification Approach (LURI) - then the HCV Assessment that performed by an RSPO approved assessor or an HCVN/ALS Licensed Assessor remains valid and must be followed by an HCS Assessment submitted to the HCSA.

#	Indicator	Comment (English)
597	7.11.3	Proposal: Adding a LURI completion timeline c) For certification units that are already certified with new land clearing in areas classified as high risk in accordance with the RSPO Land Use Risk Identification Approach (LURI) - then HCV Assessment is carried out by an RSPO approved assessor or HCVN Licensed Assessor /ALS remains in effect and must be followed by the HCS Assessment submitted to the HCSA
598	7.11.3	Proposal: Adding a LURI completion timeline c) For certification units that are already certified with new land clearing in areas classified as high risk in accordance with the RSPO Land Use Risk Identification Approach (LURI) - then HCV Assessment is carried out by an RSPO approved assessor or HCVN Licensed Assessor /ALS remains in effect and must be followed by the HCS Assessment submitted to the HCSA
599	7.11.3	Proposal: Adding a LURI completion timeline c) For certification units that are already certified with new land clearing in areas classified as high risk in accordance with the RSPO Land Use Risk Identification Approach (LURI) - then HCV Assessment is carried out by an RSPO approved assessor or HCVN Licensed Assessor /ALS remains in effect and must be followed by the HCS Assessment submitted to the HCSA
600	7.11.3	Suggestion: Add a timeline for completion of LURI c) For certification units that are already certified with new land clearing in areas classified as high risk in accordance with the RSPO Land Use Risk Identification Approach (LURI) - then an HCV Assessment is carried out by an RSPO approved assessor or HCVN Licensed Assessor /ALS remains in effect and must be followed by the HCS Assessment submitted to the HCSA.
601	7.11.3	Proposal: Adding a LURI completion timeline c) For certification units that are already certified with new land clearing in areas classified as high risk in accordance with the RSPO Land Use Risk Identification Approach (LURI) - then HCV Assessment is carried out by an RSPO approved assessor or HCVN Licensed Assessor /ALS remains in effect and must be followed by the HCS Assessment submitted to the HCSA
602	7.11.3	Proposal: Adding a LURI completion timeline c) For certification units that are already certified with new land clearing in areas classified as high risk in accordance with the RSPO Land Use Risk Identification Approach (LURI) - then HCV Assessment is carried out by an RSPO approved assessor or HCVN Licensed Assessor /ALS remains in effect and must be followed by the HCS Assessment submitted to the HCSA
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604	7.11.4	FONAP task force: this procedure needs to be of participatory nature.
605	7.11.4	FONAP task force: this procedure needs to be of participatory nature.
606	7.11.4	This has been part of P&C 2018, therefore we see urgency to define the rules for HFCCs
607	7.11.4	FONAP task force: this procedure needs to be of participatory nature.

#	Indicator	Comment (English)
608	7.11.4	should this not be 7.11.3? + Procedure note. It should be 7.11.3
609	7.11.4	This indicator corresponds to 7.12.3 of the P&C 2018. According to the ASI database, this indicator has never led to an NC.
610	7.11.4	Unclear why Procedural note from 2018 P&C was removed
611	7.11.4	Suggest removing as there are no legacy cases in the HCSA. And not defined by the RSPO. Need also to remove the definition of HFCL.
612	7.11.4	RAN is not supportive of the text as written. The RSPO should reinstate the following in the Procedural note from the previous P&C: PROCEDURAL NOTE for 7.11: "... The RSPO also acknowledged that these 'HFCCs' urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and environmental safeguards. Hence, an adapted procedure is to be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights in HFCC. Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs). The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members. In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and publicly available."
613	7.12	OLD 7.12 split into 7.11 and 7.12 (We welcome the proposed addition)
614	7.12	We suggest bringing back the phrasing from 2018 P&C related to causing damage to HCVs (the values), not only HCV areas (where these are found), because protection of HCVs may require management measures are also implemented in areas surrounding the exact location of the values (HCV management areas). Suggested: All HCVs, HCS forests, peatland, RTE species and habitats and other conservation areas identified in the Unit of Certification are managed and monitored for their protection and enhancement.
615	7.12	Peat does not need to be specified because this criterion focuses on forest, HCV and HCS areas. If in certain cases peat is identified as forest, HCV or HCS then the conservation efforts will automatically include the peat itself
616	7.12.1	FONAP task force: RSPO needs to develop specific guidance.
617	7.12.1	FONAP task force: RSPO needs to develop specific guidance.

#	Indicator	Comment (English)
618	7.12.1	Based on published add-on criteria of the German Forum for Sustainable Palm Oil (FONAP) e.V. (https://www.forumpalmoel.org/imglib/downloads/Vereinsdokumente/FONAP%20Additional%20Criteria): New wording of 7.12.1: An integrated management plan (IMP) to protect and/or enhance identified HCVs and HCS forests, and habitat for RTE species, peatland and/or other conservation areas including biodiversity corridors in plantations, of the Unit of Certification, shall be documented, implemented and updated in line with the RSPO IMP Procedure. Additional note: The requirement for the establishment of biodiversity corridors within plantations shall be considered during the development and review of RSPO IMP procedures. + Biodiversity corridors within the plantation would have been identified as HCV 1 management areas.
619	7.12.1	This contradicts what is being said in the criteria, that protection is required within the UOC. Control in the wider landscape would be impossible. + Provide clear understanding on 'agreements' - this is challenging - to have agreement in wider landscape and to define the scope of audit. Just the agreement (paper) or the content too?
620	7.12.1	consist
621	7.12.1	Jurisdictional guidance and reference is required
622	7.12.1	Add IMP to the definitions
623	7.12.1	Kindly provide clarification on procedural note, item II; "Incorporates the agreements with affected communities;"
624	7.12.1	The RSPO should also refer to the HCSA ICLUP Guidance The HCSA's Integrated Conservation and Land Use Plan Development and Implementation Guidance should be referred to as best practice guidance for management and monitoring of HCV areas, HCS forests, peatlands etc . https://highcarbonstock.org/wp-content/uploads/2021/06/03-HCSA-ICLUP-singlepages.FinalDraft.pdf
625	7.12.1	This has to be JA wide- which may not necessarily be an IMP but a different version of it. Must not be too restrictive in the prescription of a management plan.
626	7.12.1	HCV-HCSA assessment report (or HCV and Standalone HCSA report when applicable; see 7.11.3C)
627	7.12.1	FONAP task force: RSPO needs to develop specific guidance.
628	7.12.1	add: incorporates any recommendations from other relevant studies (ESIA, soil, peat and riparian studies, etc).
629	7.12.1	Previous wording seems to have been removed here "Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced." Useful still to explicitly state this, to be clear on this principle
630	7.12.1	the use of the word "affected" in the community predetermines that the operation generates a negative impact given the connotation of the word affectation in Spanish. It is suggested to improve the wording to "communities considered an interested party;" to avoid bias.

#	Indicator	Comment (English)
631	7.12.1	"Suggestion: UoC already has HCV or HCV-HCS results along with their management and monitoring actions, this should be sufficient so that there is no need for RSPO IMP Suggestion: delete section on RPT/IMP RSPO: v) If applicable, include every RPT developed through the New Planting Procedure (NPP) process (Because there is already a Kaliman in the certification unit, the NPP process also has its own procedures) If the RSPO RPT Procedure does not exist, the RPT developed by the Certification Unit must contain the information listed in the Procedure Note above (p. this is strange because one side of the PNC has detailed procedures but still talks if the procedure doesn't exist)."
632	7.12.1	Suggestion: UoC already has HCV or HCV-HCS results along with management and monitoring actions, this should be sufficient so that RSPO IMP is no longer needed New Planting Procedure (NPP) process. (Because there is already a kaliman in the unit of certification, the NPP process also has its own procedure) If the RSPO RPT Procedure does not exist, the RPT developed by the Certification Unit must contain the information listed in the Procedure Note above (this is odd because one side of the PNC has already been detailed procedure but still talk if procedure does not exist).
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634	7.12.1	Suggestion : - The UoC already has HCV or HCV-HCS results along with management and monitoring actions, this should be sufficient so that there is no need for the RSPO IMP. - Remove section on RSPO RPT/IMP : v) If applicable, include any RPT developed through the New Planting Procedure (NPP) process. (Because there is already a sentence in the unit of certification, the NPP process also has its own procedure.) If the RSPO RPT Procedure does not exist, the RPT developed by the Certification Unit must contain the information listed in the Procedure Note above.
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638	7.12.1	The UoC already has HCV or HCV-HCS results along with management and monitoring actions, this should be sufficient so that there is no need for the RSPO IMP
639	7.12.1	Response to Indicator 7.12.1 : UoC already has HCV or HCV-HCS results along with Plans and realization of HCV Management and HCV and HCS Monitoring as well so if there has to be another IMP it will be duplicated and impractical, so there is no need for RSPO IMP anymore Proposal to improve Indicator Point 7.12.1 point v becomes: v) If applicable, include every RPT developed through the New Planting Procedure (NPP) process. (Because there is already a sentence in the unit of certification, the NPP process also has its own procedure) If the RSPO RPT Procedure does not exist, the RPT developed by the Certification Unit must contain the information listed in the Procedure Note above (this is odd because one side of the PNC has already been detailed procedure but still talk if procedure doesn't exist)
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647	7.12.1	Proposal: Point V of the 2nd sentence in the procedural notes is abolished
648	7.12.2	FONAP task force: the participatory nature of this approach needs to be safeguarded.
649	7.12.2	FONAP task force: the participatory nature of this approach needs to be safeguarded.
650	7.12.2	body
651	7.12.2	What happens after the UoC report to the RSPO and CB? Will any action be taken on the company? Will this solve the issue with clearance/damage of the HCV areas by the affected communities? Will this influence companies to use 'clearing of HCV by local community' as an excuse?
652	7.12.2	FONAP task force: the participatory nature of this approach needs to be safeguarded.
653	7.12.2	As this is not a critical criterion, make it conditional to the development of the guidance, which shall involve the WG-BHCV, as it cannot be audited without the guidance.

#	Indicator	Comment (English)
654	7.12.2	The RSPO should align its approach with the HCSA Toolkit, Social Requirements and ICLUP guidance. https://highcarbonstock.org/the-hcs-approach-toolkit/
	7.12.2	how to measure agreement – it is difficult to implement – a system to manage HCV, HCS and RTE – identifying community and to allow continuous access – monitoring and management – is challenging (high resource intensity requirement)
655	7.12.2	the use of the word "affected" in the community predetermines that the operation generates a negative impact given the connotation of the word affectation in Spanish. It is suggested to improve the wording to "communities considered an interested party;" to avoid bias.
656	7.12.2	Suggestion: Any disturbance to HCV is included in the HCV monitoring report and reported as an object of audit in each RSPO audit cycle. There is therefore no need to make specific requirements regarding reporting of this to the RSPO
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660	7.12.2	Addition of new provisions regarding reporting of HCV areas disturbed by community activities to the CB and RSPO secretariat
661	7.12.2	Suggestion: Any disturbance to HCV is included in the HCV monitoring report and reported as an object of audit in each RSPO audit cycle. There is therefore no need to make specific requirements regarding reporting of this to the RSPO
662	7.12.2	Proposed improvement Indicator 7.12.2 : Removing the requirement to report to the RSPO Secretariat... because any disturbance to HCV has been recorded in the HCV monitoring report and reported as an object of audit in each RSPO surveillance audit cycle. Reporting makes duplication impractical and is not necessarily reviewed by the RSPO due to routine activities.
663	7.12.2	Suggestion: Any disturbance to HCV is included in the HCV monitoring report and reported as an object of audit in each RSPO audit cycle. There is therefore no need to make specific requirements regarding reporting of this to the RSPO. Given that feedback for reporting takes time etc
664	7.12.2	Suggestion: Any disturbance to HCV is included in the HCV monitoring report and reported as an object of audit in each RSPO audit cycle. There is therefore no need to make specific requirements regarding reporting of this to the RSPO
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672	7.12.3	FONAP task force: What is the reference for classification? IUCN? Please, improve the wording.
673	7.12.3	FONAP task force: What is the reference for classification? IUCN? Please, improve the wording.
674	7.12.3	change ".is" for "or is"
675	7.12.3	RTE identification based on HCV assessment only? + The intention to protect any RTE that may have been missed in the HCV assessment is valid (assessment results may be affected by the season when conducted, for example). Yet, shouldn't such species been added to the baseline of HCV 1 species, instead of creating a parallel list and associated set of management prescriptions?
676	7.12.3	FONAP task force: What is the reference for classification? IUCN? Please, improve the wording.
677	7.12.3	any individual or a worker?
678	7.12.3	be in place
679	7.12.4	FONAP task force: the mandatory elements of this Integrated Management Plan need to be clearly defined and also the participatory nature of the management of these areas. Actions to improve the livelihoods of neighboring communities are key to avoid negative impacts on these forest areas.
680	7.12.4	FONAP task force: the mandatory elements of this Integrated Management Plan need to be clearly defined and also the participatory nature of the management of these areas. Actions to improve the livelihoods of neighboring communities are key to avoid negative impacts on these forest areas.
681	7.12.4	missing word 'habitats' I assume
682	7.12.4	The HCSA's Integrated Conservation and Land Use Plan Development and Implementation Guidance should be referred to as best practice guidance for management and monitoring of HCV areas, HCS forests, peatlands etc . https://highcarbonstock.org/wp-content/uploads/2021/06/03-HCSA-ICLUP-singlepages.FinalDraft.pdf
683	7.12.4	FONAP task force: the mandatory elements of this Integrated Management Plan need to be clearly defined and also the participatory nature of the management of these areas. Actions to improve the livelihoods of neighboring communities are key to avoid negative impacts on these forest areas.
684	7.12.4	I suggest adding: "...including Common Guidance for the Management and Monitoring of HCVs" (HCVN , 2018)

#	Indicator	Comment (English)
685	7.12.4	This has to be JA wide- which may not necessarily be an IMP but a different version of it. Must not be too restrictive in the prescription of a management plan.
686	7.12.4	The UoC already has HCV or HCV-HCS results along with their management and monitoring actions, they should be sufficient so that the RSPO IMP is no longer needed