

DRAFT 1 RSPO Independent Smallholder (ISH) Standard 2023

Public commenting period: 1 Nov to 31 Dec 2022

NOTES:

This Draft 1 of RSPO ISH Standard 2023 is:

- 1) Meant for public comments and NOT to be used for implementation compliance check.
- 2) The Stepwise Approach for ISH Certification is not for commenting.
- 3) Principle, Criteria, Indicators and Internal Control System for ISH Standard are revised and open for public comments.
- 4) The revised wordings are highlighted in **RED**.

1 Who can use the RSPO Independent Smallholder Standard to pursue RSPO Certification

This RSPO ISH Standard is only applicable to those smallholders that qualify as independent smallholders and is applicable for sustainable palm oil production worldwide. Smallholders can be both men and women. A smallholder can pursue certification through the RSPO ISH if:

- They are NOT a scheme smallholder (see definition Annex 1).
- The total size of their oil palm production area is
 - smaller than or equal to 50 hectares(ha) if no threshold is defined in a National Interpretation; OR
 - smaller than or equal to the maximum size defined in a National Interpretation (e.g., for Indonesia this implies threshold size is 25 ha or below and for Ecuador 75 ha or below).
- They have the enforceable decision-making power on the operation of the land and production practices.
- They have the freedom to choose how they utilise the land, type of crops to plant, and how to manage them (how they organise, manage and finance the land).
- They meet any further criteria relative to the applicability of this standard as provided in the National Interpretation of their country.

2 To what does the RSPO Independent Smallholder Standard apply

The RSPO ISH Standard applies to the total combined plots of an individual smallholder that are under oil palm production. This is provided that the total area belonging to the individual smallholder does not exceed the size threshold (50 ha or as defined in a National Interpretation).

This ISH Standard is applicable for:

- Existing plots under oil palm production; AND
- Plots that are allocated for replanting or new planting of oil palm; AND
- Plots that are, or may potentially, be allocated for new planting of oil palm.

How to define the total size of a palm production area?

- i) The total size of the oil palm production area is defined by accumulating all plots owned by a smallholder, regardless of where they are located.
- ii) This includes existing plots with oil palm planting as well as areas available for replanting or areas allocated for new oil palm planting, that are owned by an individual smallholder within or outside the unit of certification (e.g. the group that the smallholder is part of).
- iii) This means if a smallholder owns and operates oil palm plots outside the group (unit of certification) that is being certified, even if this plot is in another village or another region, it is also counted as part of the cumulative hectares).

Principle 1: Optimise productivity, efficiency, positive impacts and						
		Indicators				
Criteria		Eligibility (E)		Milestone A (MS A)		Milestone B (MS B)
1.1	Smallholders establish a legally independent entity from the milling company, and the group will have an organisational capacity to comply with the RSPO ISH Standard.	1.1E	Legally registered entities have documented evidence to include: 1. Legal formation (as per country requirements) 2. Fair and transparent decision making and governance 3. Additional documents per requirements for Group Formation and Management. 4. Signed or thumb printed Smallholder Declaration from all smallholder members (Reference Annex 2).	1.1 MS A	Group manager and group members have an Internal Control System (ICS) that meets all the ICS Eligibility and MS A requirements (section 3.2 below) and complete training on oil palm pricing mechanisms, financial management, and best practices for smallholder organisations.	1.1 MS B Smallholder groups are operating in accordance with best management practices for groups , including: • Fair and transparent decision-making and governance • Financial management.
1.2	Smallholders have the capacity to effectively manage their farm.	1.2 E	The ISH group has a training program plan which has been communicated to its members.	1.2 MS A	Smallholders complete training on farm business operations, monitoring and planning. The training includes capacity building o record keeping for production, including inputs, yield, use of labor and farm operation transactions.	1.2 MS B Smallholders are managing their farms effectively and maintain records of production and transaction data of all FFB sales.
1.3	Smallholders implement best management practices (BMP) on their farms according to minimum topics recommended by RSPO.	1.3 E	Smallholders commit to implementing best management practices on their farms (reference to Smallholder Declaration, 1.1 E, Annex 2)	1.3 MS A	Smallholders complete training on BMP that includes good agricultural practices (GAP).	1.3 MS B Smallholders have adopted BMP on their farms and are tracking their productivity through, but not limited to records of FFB sales.

Principle 2: Ensure legality, respect for land rights and community wellbeing							
		Indicators					
Criteria (ISH 2019)		Eligibility (E)		Milestone A (MS A)		Milestone B (MS B)	
2.1	Smallholders have legal or customary rights to use the land in accordance with national and local laws, and customary practices.	2.1 E	Smallholders provide the coordinates or maps of their plots and evidence of ownership, or rights to use the land or demonstrate that they are in the process of legalisation of that right. (reference Indicator 1.1 E, Annex 2).	2.1 MS A	Smallholders can demonstrate legal ownership or native and/or customary rights to use the land.	1.1 MS B	Smallholders plots are clearly and visibly demarcated and maintained, and the smallholders are operating only within these boundaries.
2.2	Smallholders have not acquired lands from indigenous peoples, local communities or other users without their free, prior and informed consent (FPIC), based on a simplified FPIC approach.	2.2 E	For existing plots, smallholders can demonstrate that they have not acquired land without FPIC of indigenous peoples, local communities or other users (reference Indicator 1.1 E, Annex 2).	2.2 MS A	Same as Eligibility	2.2 MS B	Same as Eligibility
2.3	The right to use the land is not disputed by indigenous peoples, local communities or other users.	2.3 E	Smallholders declare any existing disputes on the land, commit and develop a plan to resolve said disputes, and provide information on the current status of those disputes (if any). (Reference Indicators 1.1 E, Annex 2).	2.3 MS A	There is an absence of disputes among indigenous peoples, local communities or other users, regarding land, resource-use and access rights; or where there is a dispute, dispute resolution processes are implemented and the process is accepted by all parties involved.	2.3 MS B	Same as Milestone A
2.4	Smallholder plots are located outside of areas classified as national parks or protected areas, as defined by national, regional, or local law, or as specified in National Interpretations, or according to the Natural Protected Area management plans authorized and published by national laws.	2.4 E	Smallholder plots are located outside of areas classified as national parks or protected areas as defined by national, regional or local law, or as specified in National Interpretations (Reference 1.1 E, Annex 2).	2.4 MS A	Same as Eligibility	2.4 MS B	Same as Eligibility

Principle 2: Ensure legality, respect for land rights and community wellbeing							
Criteria (ISH 2019)		Indicators					
		Eligibility (E)		Milestone A (MS A)		Milestone B (MS B)	
2.5	<p>Do any smallholders within the group have plans for new planting of oil palm? If none, SKIP.</p> <p>For new planting, smallholders do not clear or acquire any land without obtaining FPIC of indigenous peoples and/or local communities and/or other users, based on a simplified FPIC approach.</p>	2.5 E	For new oil palm planting, smallholders commit not to clear or acquire land from indigenous peoples, local communities, or other users (e.g. State government, commercial owner) without their FPIC, based on a simplified FPIC approach (reference 1.1 E, Annex 2).	2.5 MS A	<p>Do any smallholders within the group have plans for new planting of oil palm? If none, SKIP.</p> <p>Smallholders complete training on how to conduct a simplified FPIC approach.</p>	2.5 MS B	<p>Do any smallholders within the group have plans for new planting of oil palm? If none, SKIP.</p> <p>Based on a simplified FPIC approach, smallholders jointly agree on a plan with the affected indigenous peoples and/or local communities and/or other rights holders, including vulnerable groups, for new oil palm developments, if these involve land-use change.</p>

Principle 3: Respect human rights, including workers' rights and conditions					
		Indicators			
Criteria ISH 2019		Eligibility (E)	Milestone A (MS A)	Milestone B (MS B)	
3.1	There is no use of forced labour.	3.1 E Smallholders commit to no use of forced labor and ensure that any use of forced labour on the farm is terminated at Eligibility by formalising a simplified work agreement (ie work register) stipulating the basic terms of employment. Smallholders provide information on the source of labor including family members, working on the farm and hired labor including contract workers (reference 1.1 E, Annex 2).	3.1 MS A Smallholders complete training on free and fair labour and implement measures to ensure that all work is voluntary, and the following practices are prohibited: <ul style="list-style-type: none"> • Retention of identity documents including but not limited to passports; • Payment of recruitment fees by workers; • Contract substitution; • Involuntary overtime; • Lack of freedom of workers to resign; • Penalty for termination of employment; • Debt bondage; • Withholding of wages. 	3.1 MS B	Indicator 3.1 MSB: There is no evidence of forced labor. Smallholders implement measures to ensure that all work is voluntary, and the following practices are prohibited: <ul style="list-style-type: none"> • Retention of identity documents, including but not limited to passports; • Payment of recruitment fees by workers; • Contract substitution; • Involuntary overtime; • Lack of freedom of workers to resign; • Penalty for termination of employment; • Debt bondage; • Withholding of wages. PROCEDURAL NOTE. The RSPO will develop the guidance for GM.
3.2	Children are not employed or exploited. Work by children is acceptable on family farms, under adult supervision and when not interfering with education programmes. Children are not exposed to hazardous working conditions as defined in ILO.	3.2 E Smallholders are aware of what defines child labour and ensure that any child labour in farm operations is terminated at Eligibility. Awareness of child labour and commitment to no child labour, even on family farms , includes: <ol style="list-style-type: none"> 1. Compliance with the minimum age of workers and as defined by local, state, or national law, or international law in the absence of local, state or national laws. 2. Not exposing children to hazardous work. 3. Providing adult supervision of children and/or young people working on the farm. 4. Ensuring the practice of children's right to education is unrestricted and respected (reference 1.1 E, Annex 2). 	3.2 MS A Group managers and smallholders implement measures to protect children as follows: <ol style="list-style-type: none"> 1. There are no workers on smallholder farms under the age of 15 or under the minimum age defined by local, state or national law, whichever is higher. 2. Children are only permitted to help on family farms and are not permitted to perform dangerous, hazardous or heavy work. 3. If young workers are employed, their work is not mentally or physically harmful and does not interfere with their schooling, if applicable. 	3.2 MS B	Same as MS A

Principle 3: Respect human rights, including workers' rights and conditions							
		Indicators					
Criteria ISH 2019		Eligibility (E)		Milestone A (MS A)		Milestone B (MS B)	
3.3	<p>Are there workers on the farm? If no, SKIP</p> <p>Workers' pay complies with minimum legal requirements, mandatory industry standards as defined by national law or collective bargaining, whichever takes priority in local regulations. The term workers includes permanent and non-permanent workers.</p>	3.3 E	Smallholders commit to pay workers according to minimum legal requirements or mandatory industry standards (reference 1.1 E, Annex 2).	3.3 MS A	Workers receive payments as expected and agreed in accordance with at least the legal minimum wage rate (excluding overtime premiums) and without discrimination against vulnerable groups, including women.	3.3 MS B	Workers receive payments as expected and agreed in accordance with at least the legal minimum wage rate (excluding overtime premiums) and without discrimination against vulnerable groups, including women.
3.4	<p>Are there workers on the farm? If no, SKIP</p> <p>Workers understand their rights and freedom to file a complaint/grievance to group manager or relevant third parties, including RSPO.</p>	3.4 E	Smallholders commit to respect the rights of workers to file a complaint/grievance (reference 1.1 E, Annex 2).	3.4 MS A	Smallholders complete training on workers' rights to file a complaint/grievance and communicate to workers the means to file a complaint/grievance.	3.4 MS B	Workers are aware of and have access to an effective means for filing a complaint/grievance.
3.5	Working conditions and facilities are safe and meet minimum legal requirements.	3.5 E	Smallholders commit to providing safe working conditions and facilities including appropriate PPE (reference 1.1 E, Annex 2).	3.5 MS A	Smallholders, workers, and family members complete training and aware of health and safety risks associated with farm work, (including that of pesticide use) and how to mitigate them.	3.5 MS B	Workers, including smallholder family members, have access to safe working conditions and amenities that include: <ul style="list-style-type: none"> • Safe and adequate housing, where applicable; • Access to basic first aid supplies; • Health and safety equipment, including minimum personal protective equipment (PPE) if appropriate for the type of work; • Adequate drinking water; • Access to toilets.
3.6	<p>Are there workers on the farm? If no, SKIP</p> <p>There is no discrimination, harassment, or abuse on the farm.</p>	3.6 E	Smallholders commit to no discrimination, harassment or abuse on the farm (reference 1.1 E, Annex 2).	3.6 MS A	Smallholders complete training on workplace discrimination, harassment and abuse and are aware of the need for a safe workspace.	3.6 MS B	No evidence can be found of discrimination, harassment, or abuse.

Principle 4: Protect, conserve and enhance ecosystems and the environment						
		Indicators				
Criteria (ISH 2019)	Eligibility (E)	Milestone A (MS A)	Milestone B (MS B)			
4.1 High Conservation Values (HCVs) areas and High Carbon Stock (HCS) forests after November 2019, in the smallholder plot or within the managed areas, identified through the simplified combined HCV-HCS approach, are managed to ensure that they are maintained and/or enhanced.	4.1 E Smallholders commit to protect HCV areas and HCS forests through the precautionary practices approach, and care and protection of RTE (rare, threatened, or endangered) species. (reference 1.1 E, Annex 2)	4.1 MS A Smallholders and workers (if any) complete training on and are aware of: <ul style="list-style-type: none"> • the importance of maintaining and conserving HCVs and HCS forests • human-wildlife conflict and mitigation efforts • RTE species and important ecosystems. 	4.1 MS B Smallholders implement precautionary practices and manage and maintain RTE species, HCVs and HCS forests, where applicable.			
4.2 Where the existing smallholder plot has been planted and cleared after November 2005 or is on an area identified as HCS forest after November 2019 up to the eligibility period, a RaCP process appropriate for smallholders based on Land Use Change Analysis (LUCA) will be applicable (reference preamble).	4.2 E Smallholders and Group Manager provide information on all smallholder plots converted and planted with oil palm after 2005, through the result of Land Use Change Analysis (LUCA) or any other tools approved by RSPO. (reference 1.1 E, Annex 2)	4.2 MS A Group members develop a plan to identify the maximum area for on-site remediation of HCVs lost since 2005 and HCS forests lost since November 2019, through a participatory process and the plan is submitted to RSPO.	4.2 MS B An RSPO approved plan to remediate HCVs lost since 2005 and HCS forests lost since November 2019 is implemented.			

Principle 4: Protect, conserve and enhance ecosystems and the environment							
		Indicators					
Criteria (ISH 2019)		Eligibility (E)	Milestone A (MS A)		Milestone B (MS B)		
4.3	<p>Do any smallholders within the group have plans for new planting of oil palm? If none, SKIP.</p> <p>New planting of independent smallholders, since November 2019:</p> <ul style="list-style-type: none"> Do not replace any HCVs Do not replace any HCS forests as defined by the simplified combined HCV-HCS approach Are not on steep slopes (more than 25 degrees or as in the National Interpretation) Are not on peat areas of any depth. Are not located in restricted areas or protected by national laws. Are not on riparian areas 	4.3 E	Smallholders provide information on all planned new planting and commit to no new planting are on HCVs or HCS forests, on steep slopes (more than 25 degree or as in the NI) or on peat until the HCV-HCS procedure is completed (reference 1.1 E, Annex 2)	4.3 MS A	<p>Do any smallholders within the group have plans for new planting of oil palm?</p> <p>Before any land preparation commences, group members develop an integrated management plan through a participatory approach to maintain or enhance HCVs as well as HCS forests identified after November 2019, as identified by the simplified combined HCV-HCS approach, before any land preparation commences.</p>	4.3 MS B	<p>Do any smallholders within the group have plans for new planting of oil palm?</p> <p>Smallholders have an RSPO approved integrated management plan for their planned new planting and share a notice of this plan with those involved in the participatory mapping before any land preparation commences.</p>
4.4	<p>Do any smallholders within the group have existing plots on peat? If no, SKIP</p> <p>Where smallholder plots exist on peat, subsidence and degradation of peat soils are minimised by use of best management practices.</p>	4.4 E	Group manager confirms presence of peat on existing plots within the group and smallholders on peat commit to using best management practices (BMPs), and minimising subsidence and degradation of peat soils (reference 1.1 E, Annex 2).	4.4 MS A	Smallholders complete training on best management practices (BMPs) for peat. Group manager and smallholders established an action plan to minimise risk of fire, to apply BMPs for planting on peat and manage water systems in the certification unit.	4.4 MS B	Smallholders implement the group's action plan based on BMPs, including fire and water management, and monitoring of subsidence rate for existing planting on peat.
4.5	<p>Do any smallholders within the group have plans for replanting plots that are located on peat? If no, SKIP.</p> <p>Plots on peat are replanted only on areas with low risk of flooding or saline intrusion as demonstrated by an RSPO approved flood risk assessment, in accordance with the RSPO ISH Flood Risk Assessment Template.</p>	4.5 E	Smallholders commit to provide information on all plans for replanting and commit that replanting will only be in areas with low risk of flooding or saline intrusion (reference 1.1 E, Annex 2).	4.5 MS A	All smallholders with plots on peat complete training on identification of future risks of flooding or saline intrusion, and alternate land development strategies.	4.5 MS B	Prior to replanting on peat, smallholders complete a risk assessment related to flooding or saline intrusion and, where there is high risk, present a plan that includes alternate land development strategies, preferencing alternative livelihood planning.

Principle 4: Protect, conserve and enhance ecosystems and the environment							
		Indicators					
Criteria (ISH 2019)		Eligibility (E)		Milestone A (MS A)		Milestone B (MS B)	
4.6	Fire is not used on the oil palm plot for preparing land or for pest control, nor open fire for waste management on the farm.	4.6 E	Smallholders commit to no burning for preparing land or for pest control, nor open fire for waste management. Group manager records evidence of prior burning of members joining the group (reference 1.1 E, Annex 2).	4.6 MS A	There is no physical evidence of new burning (after eligibility) for land preparation for oil palm by smallholders. Smallholders complete training on and are aware of: <ul style="list-style-type: none"> • alternatives to fire for land preparation and farm waste management (where appropriate and possible) • alternatives to fire for pest control • fire prevention and how to respond to and manage fires in their community and village. 	4.6 MS B	Smallholders do not use fire or practice burning for land preparation, waste management or pest control on the farm. For pest control, fire may be used only in exceptional circumstances i.e. where no other effective measures exist and with prior approval of relevant authority.
4.7	Riparian buffer zones are identified and managed to ensure maintenance and/or improvement, in accordance with national legislation and taking into account the RSPO Manual for the latest version of the Management and Rehabilitation of Riparian Reserves - Simplified Guide	4.7 E	Group manager identifies riparian buffer zones within the group and smallholders, in accordance with the latest version of the RSPO Manual for the Management and Rehabilitation of Riparian Reserves - Simplified Guide, in order to manage them in existing plantations and commit to no new planting in riparian zones (reference 1.1 E, Annex 2).	4.7 MS A	Smallholders complete training on and are aware of riparian buffer zone management, and the group has an action plan to maintain and/or enhance riparian buffer zones.	4.7 MS B	Smallholders maintain and/or enhance riparian buffer zone areas, in accordance with national legislation and taking into account the latest version of the RSPO Manual for the Management and Rehabilitation of Riparian Reserves - Simplified Guide.

Principle 4: Protect, conserve and enhance ecosystems and the environment							
		Indicators					
Criteria (ISH 2019)		Eligibility (E)		Milestone A (MS A)		Milestone B (MS B)	
4.8	Pesticides are used in ways that do not endanger the health of workers, family, communities or the environment	4.8 E	Smallholders commit to phase out paraquat and pesticides categorised as WHO Class 1A or 1B and those listed by the Stockholm or Rotterdam Conventions by: <ul style="list-style-type: none"> • immediately stop purchasing these pesticides • phasing out use of remaining stock by MS B • providing information for the group manager to keep record of pesticide purchase and use (reference 1.1 E, Annex 2). 	4.8 MS A	Smallholders complete training on BMPs for pesticides including pesticide usage, awareness on risks for pregnant and breastfeeding women and young workers; storage and disposal; paraquat and pesticides listed by WHO Class 1A or 1B, the Stockholm or Rotterdam Conventions (and in compliance with 3.5).	4.8 MS B	Smallholders implement BMPS for all pesticide use, including prohibiting use of pesticides by pregnant and breastfeeding women and young workers, and exclusion of paraquat and pesticides that are categorised as WHO Class 1A or 1B, or those listed by the Stockholm or Rotterdam Conventions, unless when authorised by relevant authorities for pest outbreaks.
4.9	The group and smallholders manage pests, diseases, weeds and invasive introduced species using appropriate techniques, including but not limited to Integrated Pest Management (IPM) techniques.	4.9 E	NA	4.9 MS A	Smallholders complete training on and are aware of BMPs, including, but not limited to safe chemical use, IPM, weed and invasive species management.	4.9 MS B	The group and smallholders maximise use of IPM approaches to minimise use of pesticides and herbicides on their farm.

A - ICS: Group entity and group management requirements						
Criteria (ISH 2019)		Indicators				
		Eligibility (E)		Milestone A (MS A)		Milestone B (MS B)
A1	The group demonstrates that they are legally formed.	A1.1 E	The group has appointed a group manager.	A1.1 MS A	Same as Eligibility	A1.1 MS B Same as Eligibility
		A1.2 E	The group manager has evidence of the existence of the legal entity.	A1.2 MS A	Same as Eligibility	A1.2 MS B Same as Eligibility
		A1.3 E	The group has membership requirements.	A1.3 MS A	Same as Eligibility	A1.3 MS B Same as Eligibility
		A1.4 E	All members have signed and acknowledged membership requirements.	A1.4 MS A	All members can demonstrate understanding of membership requirements.	A1.4 MS B Same as MS A
A2	The group manager is responsible for managing the group for certification.	A2.1 E	The group manager includes members' participation and/or consultation in planning for the implementation of the group's ICS The group manager has planned for the implementation of the group's ICS that includes members' participation.	A2.1 MS A	The group manager can demonstrate compliance with the ICS through the implementation of individual members.	A2.1 MS B Same as MS A
		A2.2 E	The group manager demonstrates understanding of the RSPO ISH Standard, group certification and related topics and has sufficient resources to manage the group.	A2.2 MS A	The group manager can demonstrate capacity to manage and operate group certification and certification requirements.	A2.2 MS B Same as MS A
		A2.3 E	A group annual training plan is available covering the RSPO ISH Standard, group management (which includes group objectives, structure, relevant procedures and the certification process) and other topics as outlined in the ISH Standard.	A2.3 MS A	The group manager implements a phased approach to ensure members have progressively attended training on the ISH Standard, group management and other topics as outlined in the ISH Standard according to the group annual training plan.	A2.3 MS B All members attended training and can demonstrate understanding of the ISH Standard, group management and certification requirements including awareness on BMPs, HCV, environmental protection, social welfare of workers and business operations.

B - ICS: Policies and management							
B1	The group ICS contains documented policies, procedures and organisational information for operational management.	B1.1 E	A group ICS is available for operational management including procedures of expulsion and sanctions for members who fail to comply, and a procedure to conduct internal audits.	B1.1 MS A	The ICS is implemented and an internal audit is conducted for at least half of the group members and all audit findings are closed.	B1.1 MS B	The ICS is implemented and an annual internal audit of the group is conducted on at least half of the group members (for IC), followed by the balance half in the following year (ASA1). In the next following year until recertification, sampling size for group annual internal audit will be based on risk assessment to all existing members, which include members that fall under Medium and High risk, and new members (if any). The total sampling size for annual internal audit shall not be less than 33% of group size.
		B1.2 E	Basic information, farm information,	B1.2 MS A	Same as Eligibility	B1.2 MS B	Same as Eligibility
C - ICS: Group business planning							
C1	The group has a business plan prepared with the participation and contributions of all group members.	C1.1 E	An annual group business plan is available, which includes: <ul style="list-style-type: none"> • production and income forecasting based on historical records • plans for expansion. 	C1.1 MS A	The group business plan is implemented and reviewed at least annually.	C1.1 MS B	The group demonstrates its ability to support itself financially, with results according to the business plan
C2	The ICS of the group is integrated with the group's management plan.	C2.1 E	A group management plan is available, which covers: <ul style="list-style-type: none"> • plan on training/capacity building plans to improve productivity of group members • approach to strengthen links within the supply chain • plan for continuous improvement projects (i.e. on waste, soil, etc.), if any. 	C2.1 MS A	The group management plan is implemented and reviewed at least annually.	C2.1 MS B	The group demonstrates the implementation of management plan activities by members.

D - ICS: ICS: Group trading system for certified volumes							
D1	The group has a procedure and system in place for the tracking of FFB.	D1.1 E	There is a procedure and records are kept to track the annual production and sales of certified volumes, covering traceability of producers and/or traders are available.	D1.1 MS A	Group manager maintains annual production records and sales of certified volumes.	D1.1 MS B	Group manager maintains annual production records and sales of certified volumes of all FFB sources.
D2	The group documents and implements a system for the tracking of FFB.	D2.1 E	NA	D2.1 MS A	The group manager maintains annual production data and sales of certified volumes through Book and Claim for the group based on actual receipts for and sales by all members.	D2.1 MS B	The group manager maintains annual production data and sales of certified volumes through physical or Book and Claim for the group based on actual receipts and sales for all members and 100% of all certified volumes.
D3	The group has a procedure and system for premium distribution.	D3.1 E	The group and group manager have agreed on how the premiums should be used and the agreement is recorded and communicated to the group members. Prices, premiums, and timing of premium payment are clearly communicated and transparent to all group members. Premiums disbursed to members at all stages are recorded and the premiums are paid in a timely and convenient manner.	D3.1 MS A	The disbursement of premiums, including price and timing of the disbursement to group members is clearly recorded.	D3.1 MS B	Same as MS A