

RSPO

Roundtable on Sustainable Palm Oil



PUBLIC COMMENT ON RSPO NEXT

07 August – 06 October 2015

RSPO NEXT PUBLIC COMMENT

Comments on the Introduction

Answer Options	Response Count
	33

Number	Response Date	Response Text
1	8-Oct-2015	We are very supportive of the development of the RSPO Next voluntary module, as it introduces the key issues we were calling for in the 2013 P&C Review.
2	6-Oct-2015	<p>It would be helpful to include in the introduction what the proposed immediate route to market will be for RSPO Next - Book & Claim credits only? How long after the introduction of RSPO-Next is it anticipated that may these become available?</p> <p>I think that it is essential to stress that much of RSPO NEXT reinforces existing guidance in the P&Cs; emphasising that the existing standard is strong, when implemented in the manner in which it is intended.</p> <p>It might be worth including in the introduction the proposal that increasing the credibility of the RSPO by responding to market progress and advances in policies could increase demand for, and investment in by the financial sector, RSPO certified production.</p>
3	6-Oct-2015	<p>We agree that demonstrating impact by assessing the results of implementation (and responding/adapting accordingly) is a vital aspect of this, and should be stressed given the RSPO's unique position to be able to independently verify the existing commitments of companies.</p> <p>Consumers want assurance that the palm oil they purchase comes from companies committed to upholding sustainable production practices. The requirement of a company-wide policy in the review and decision for certifying suppliers as RSPO Next members is critically important, as it provides market recognition to those suppliers that are committed to go beyond the creation of isolated islands of sustainable practices by upholding sustainable practices across their entire operations. However, to credibly prove that a company is delivering on its no-deforestation policy, RSPO Next member companies should need to verify full compliance across their entire supply base, including all direct and indirect purchases of palm oil, joint ventures, acquisitions, and investments. This is necessary in order for downstream companies to identify those supply-chain partners that share and are actively upholding the values promised to end consumers.</p>
4	6-Oct-2015	<p>Supply-chain participation: It is currently unclear how companies that consume palm oil would support RSPO Next suppliers and purchase RSPO Next certified palm oil. We recommend against any procedure that would entail the development of a separate CSPO supply chain for RSPO Next palm oil.</p> <p>Re: Submission to 'Public Consultation on RSPO NEXT, a voluntary add on program to the RSPO P&C Certification Dear Board of Governors of the Roundtable on Sustainable Palm Oil (RSPO),</p> <p>Rainforest Action Network (RAN) respectfully submits the following comments and recommendations to the 'Public Consultation on RSPO NEXT, a voluntary add on program to the RSPO P&C Certification'.</p> <p>In April 2014, the Roundtable on Sustainable Palm Oil (RSPO) adopted a new set of Principles and Criteria that fell short of consumer expectations and the best practice benchmarks for responsible palm oil being set by innovative growers in the palm oil sector. Since the adoption of its revised standard, a significant number of RSPO members have stopped relying solely on the RSPO certification system and have adopted ambitious company policies that go beyond the RSPO Principles and Criteria. These policies are now being implemented and are driving innovation across the palm oil sector as they require the production and sourcing of palm oil that is fully traceable, legally grown, and verified as not associated with deforestation, expansion on peatlands of any depth, or the violation of human and worker rights.</p> <p>Rainforest Action Network (RAN) is encouraged that the RSPO Board of Governors has recognized the need for the RSPO to respond to the changing demands in the market and the call for the RSPO to strengthen its standard and to monitor and enforce its implementation by members. However, it is our view that the RSPO NEXT program, in its current form, still fails to address the requirements set by these policies as well as the expectations of civil society.</p> <p>One of the most significant weaknesses of RSPO Next is that it remains an opt-in verification system, which will not apply to all RSPO members. Rainforest Action Network, along with numerous civil society groups, companies and investors have been calling for a fast-track review of RSPO Principles & Criteria in order to raise the verification standards for all RSPO members.¹ With a voluntary RSPO Next option, RSPO member operations more broadly will still be at risk of association with deforestation, climate emissions from the clearance on peatlands and human and labor rights violations, thus leaving the credibility of RSPO certification in question.</p> <p>¹ http://www.ceres.org/files/rspo-letter</p> <p>The RSPO's reputation as a credible certification system depends on the actions of all of its members. Therefore, in order to regain its credibility RAN recommends that the RSPO raise the verification standard for all members through a revision of the Principles and Criteria, not through an opt-in program. We recognize that programs will be required to assist smallholders and community plantations to achieve the higher standard of responsible palm oil production. Furthermore, the RSPO Next indicators still fall short of other leading voluntary verification standards, notably the Palm Oil Innovation Group (POIG). Critical shortcomings include:</p> <ul style="list-style-type: none"> • The failure to require no development on High Carbon Stock forests using the High Carbon Stock Approach. A 'carbon neutral' based approach modeled after the Sustainable Palm Oil Manifesto High Carbon Stock Study is unacceptable for the reasons outlined below. • The failure to require a ban on recruitment fees for workers, prohibit retention of passports or other identity documents, or define working hours and leave. • The failure to require improved participatory land claim mapping and land use planning processes to accommodate local communities' livelihoods and aspirations, and respect for the rights of indigenous peoples and local communities to give or withhold their free, prior and informed consent (FPIC) to proposed developments that may affect their lands. Land use planning must ensure food security on customary lands over time, including periodic reviews and renegotiation of agreements to ensure inter-generational food security. • The failure to require a ban on the use of Paraquat and other highly toxic, bio-accumulative and persistent pesticides. • The failure to require plans to monitor, report and progressively reduce greenhouse gas emissions from all sources. <p>For a full list of indicators that should be incorporated into a strengthened standard please see http://tinyurl.com/odjmubz. These indicators have been developed, and are being field trialed, by the Palm Oil Innovation Group members.</p>
5	6-Oct-2015	<p>It is noted that this paragraph emphasized compliance with 'RSPO P&C and its full guidance...', however the palm oil supply chain is not covered fully by the RSPO P&C alone. Manufacturers, producers, etc are covered by the RSPO SCC standard. This brings to question the target group of RSPO NEXT. Is it growers or mills or producers...? There is need for clarity on definitions. Do 'producers' as referred to in the text mean 'growers'? It is suggested that these be clarified in the draft.</p>
6	6-Oct-2015	No comments

7	6-Oct-2015	<p>a. The components of RSPO NEXT fall into the following categories: No Deforestation, NoFire, No Planting on Peat, Reduction of GHGs, Respect for Human Rights and Transparency and are applicable at an organization wide level, including investments.</p> <p>Comments:</p> <p>Please provide more explanations on investments - is it more than 50%? Since the current RSPO system only applies for company that has majority share (more than 50%).</p> <p>b. RSPO NEXT applies to the practices on the ground not only of the RSPO Certified plantations but additionally sets up requirements regarding suppliers of raw material, regardless of the path of delivery of that supply, and their practices.</p> <p>Comments:</p> <p>Company only has control for direct suppliers who wants to implement RSPO standard. RSPO has been a voluntary scheme, thus it will be difficult to implement to suppliers who are not willing to follow RSPO.</p>
8	6-Oct-2015	<p>Please consider the following: How RSPO NEXT should be used</p> <p>RSPO NEXT should fulfill a clear function: to provide some top-up indicators to define best practice when combined with the P&C. This should incorporate the emerging definition of HCS requirements, a prohibition on new peat plantings, together with some other opportunities to elaborate or enhance other issues.</p> <p>RSPO NEXT should avoid duplication with the existing P&C, and should resist any unnecessary complexity. It should aim to be a relatively brief set of indicators - impact will be maximised by focusing on a few key areas.</p>
9	6-Oct-2015	<p>Detailed Comments 'Introduction'</p> <p>- 'RSPO Next is a voluntary initiative to engage with RSPO member companies that have met the current requirements and guidance of the RSPO P & C and in addition, through their policies and actions have exceeded them'; Solidaridad considers it is a valuable approach to ensure RSPO Next is only be accessible for companies who have ensured compliance with all P & C at all estates, including their supply bases. If such compliance is not required at full company level, RSPO Next may facilitate companies to flagship one or two model estates and make claims on these. This may diminish credibility of RSPO. Question/comment is: How is 'company' defined?</p> <p>Recommendation: It would be good to ensure this 'antiflagship' requirement applies on the broadest possible level, eg y making sure it applies on holding level.</p> <p>- 'Any review and decision regarding participation will include the scope and content of a companywide policy as well as on the ground review at the Palm Oil Mill and supply base level'. It would be great if RSPO Next stimulates companies to take responsibility for compliance with RSPO P & C of their entire supply bases, including volumes purchased from traders, collectors and independent Smallholders. However, in some cases it may be very challenging to provide assurance that compliance of full P & C is ensured in their complete supply base.</p> <p>Question: How is the supply base defined? Does it include all suppliers, including indirect suppliers? Recommendation: Ensure the requirement applies to the full supply base including Independent Smallholders.</p> <p>- 'RSPO Next applies to the practices on the ground not only of the RSPO certified plantations but additionally sets up requirements regarding suppliers of raw material, regardless of the path of delivery of that supply, and their practices.' It is unclear how this sentence relates to earlier text that companies will be verified at supply base level. Are separate requirements set for an independent supply base? If so, when can these be followed?</p> <p>Recommendations: Ensure clear definition of Supply Base. Ensure full P & C should be applied for entire supply base.</p>
10	6-Oct-2015	<p>Where terms are based on generic P&C 2013 - it should be stated. Otherwise suggest to define in this standards.</p>
11	6-Oct-2015	<p>To avoid confusion, suggest that requirements that are within P&C 2013 should not be repeated here. Only standards and requirements above/ not covered by P&C 2013 should be in the RSPO NEXT documents.</p> <p>IKEA has not completed the public consultation for RSPO Next as we had no specific comments to add to the criteria/indicators.</p>
12	6-Oct-2015	<p>However, we want to communicate that we feel that RSPO Next is a very good step in the right direction and we are 100% supportive of the initiative.</p> <p>1. INTRODUCTION:</p> <p>a. Scope: Consumers want assurance that the palm oil they purchase comes from companies committed to upholding sustainable production practices. The requirement of a company-wide policy in the review and decision for certifying suppliers as RSPO Next members is critically important, as it provides market recognition to those suppliers that are committed to go beyond the creation of isolated islands of sustainable practices by upholding sustainable practices across their entire operations. However, to credibly prove that a company is delivering on its no-deforestation policy, RSPO Next member companies should need to verify full compliance across their entire supply base, including all direct and indirect purchases of palm oil, joint ventures, acquisitions, and investments. This is necessary in order for downstream companies to identify those supply-chain partners that share and are actively upholding the values promised to end consumers.</p> <p>b. Supply-chain participation: It is currently unclear how companies that consume palm oil would support RSPO Next suppliers and purchase RSPO Next certified palm oil. We recommend against any procedure that would entail the development of a separate CSPO supply chain for RSPO Next palm oil.</p>

13 6-Oct-2015

Introduction:

WWF supports the development of a voluntary add-on to the RSPO P&Cs. We were disappointed by the 2013 P&C review not going far enough and not producing a clear set of indicators that adequately 'describe' sustainable palm oil. Not least because much of the guidance that was accepted in the P&C review as best practice should have become 'standard practice' for companies that want to conduct business responsibly.

This has been shown further by development since the review from both growers and users of palm oil to set themselves standards that 'go beyond the RSPO' - showing that indeed last years 'best practice' is this year's normal.

But despite welcoming these individual commitments WWF is worried that they rely too heavily on the role of individual companies to set, keep and report their own 'standard' or paid consultants to do so. We therefore welcome RSPO Next as a way to use the RSPO's established system of independent third party verification and certification, its existing reporting, complaints and supply chain control systems to deliver consistent change at a scale that is likely to transform the global industry.

Unfortunately the published document does not contain enough detail on issues like eligibility, scope and level of attainment required to fully judge how effective RSPO Next will be. In consequences we set out some of these requirements in this document.

WWF fully supports the intention to develop RSPO Next 'modules' for other member categories and would like to participate in this process.

14 6-Oct-2015
15 6-Oct-2015

I hope these become mandatory in the Principles and Criteria soon: No Deforestation, No Fire, No Planting on Peat of any depth.

We are glad to see that the RSPO has responded to the recent introduction of many ambitious No Deforestation policies and commitments, and we see this as an attempt to acknowledge that the current RSPO Principles & Criteria (P&C) do not prevent deforestation. We are encouraged by some of the components included in the standards, including requiring member companies to enforce No Deforestation policies at an organizational-wide level. However, we have some comments and recommendations to ensure that these standards actually become marketplace practice.

One of the most significant weaknesses of RSPO Next is that it remains a voluntary verification that does not apply to all RSPO members nor to all their operations. Greenpeace has advocated for a fast-track review of RSPO Principles & Criteria that raises expectations and verification standards for all RSPO members. At the same time, the RSPO Next indicators also fall short of other voluntary verification standards, notably the Palm Oil Innovation Group (POIG), thereby creating a range of disconnected options for companies already committed to making change on the ground, and leaving behind those companies unable or unwilling to strive towards strengthening RSPO standards itself or taking the journey for the higher standards.

Another significant weakness with RSPO Next criteria is the failure to define low carbon stock lands and high carbon stock forests to protect the remaining forests and peatlands. Missing the practical guidance like High Carbon Stock Approach and focusing only on carbon emission has made this RSPO Next is unable to cut effectively the members business practices with deforestation. Meanwhile, many RSPO members have, as part of their no deforestation commitments, been implementing the High Carbon Stock Approach on the ground as the only practical land use planning tool to deliver deforestation-free palm oil. RSPO has failed to support members' initiative; rather than create a level playing field this makes RSPO Next meaningless in transforming the palm oil industry and halting deforestation.

16 6-Oct-2015

We fully support the RSPO effort to develop the RSPO NEXT categories, guidelines and requirements.

RSPO should clarify the certification requirements for RSPO NEXT as guidelines and indicators be finalized.

17 5-Oct-2015

We suggest the flexibility be given to allow RSPO and RSPO NEXT certification be combined if both requirements are met.

general comments:

1. Credible implementation scope still to be determined:

Eligibility guidelines have not yet been provided. In Oxfam's opinion these are crucial and integral to the success of the RSPO Next standard because they determine the implementation scope and the quality and extent of verification. At the end of the day, the processes and infrastructure for implementation of any sustainability standard are likely to be more important than the design of the standard's criteria and indicators itself.

2. Verification unit must be adequate:

RSPO P&C's unit of verification has been set as "mill and supply base". With most sustainability challenges apparent in the supply base, in hindsight it would have even been better to express that in the sequence of words: "supply base and mill". In line with this, we expect the scope of RSPO Next will not only be set as "holding company including assets/investments" but rather as "assets owned or controlled by the holding" (note this should be irrespective of the size of the share).

3. Landbanks are critical for inclusion within scope:

The most significant impacts on forest, peat land and human rights - both positive or negative - are affected by decisions BEFORE plantations are established and operational. RSPO Next should therefore not only apply to "production level" or to "plantations and suppliers" but most importantly to undeveloped assets as well.

4. Requirements should lead to holistic land use planning, eventually at landscape / jurisdiction level

RSPO Next must take a land use planning framework with - holistic - conditions (e.g. carbon thresholds, development indicators, transparent and participatory approach to a jurisdictional land use/development plan etc.). RSPO Next should anticipate certification at a landscape or jurisdiction level that very likely will be desired in the near future.

5. Holistic approach is needed, beyond the carbon lens.

HCS is a cornerstone of implementing zero deforestation commitments in commodity supply chains. While HCS and forest conservation are important, they are not the only entry point to sustainable land use planning needed for developing sustainable palm oil plantings.

A first step to integration of HCS into broader planning of the implementation of "no deforestation, no peat, no exploitation" pledges might be to broaden and strengthen the HCV assessment which significantly overlaps with HCS assessments and develop an HCV+ approach that includes a more robust assessment of forest carbon and social impacts. That said, given the prior weaknesses of HCV assessments, the quality assurance process would need to be strengthened for this to be a robust mechanism. Integrating HCS within HCV would also make the HCS assessment more practical, streamlined and avoid unnecessary duplication.

Carbon, conservation, land tenure, smallholder inclusivity, demand growth do not exist in silos. Therefore, a next step is the integration of the pledges into a holistic land use planning approach; this would combine (high values for) conservation with (high values for) development needs. More comprehensive land use planning would lead to developing the commitments and plans governed by "no deforestation, no peat, no exploitation" into positive sustainable growth scenarios at a landscape or jurisdictional level.

6. What's missing

Water quantity and quality management is covered to some extent in the P&C but a more integral approach to water management is desirable, as also suggested in the POIG indicator 1.7 (water accountability). In a strategic session of the RSPO board some

18 5-Oct-2015

Introduction is very clearly describe the intent of the RSPO Next.

19	1-Oct-2015	<p>Scope: Consumers want assurance that the palm oil they purchase comes from companies committed to upholding sustainable production practices. The requirement of a company-wide policy in the review and decision for certifying suppliers as RSPO Next members is critically important, as it provides market recognition to those suppliers that are committed to go beyond the creation of isolated islands of sustainable practices by upholding sustainable practices across their entire operations. However, to credibly prove that a company is delivering on its no-deforestation policy, RSPO Next member companies should need to verify full compliance across their entire supply base, including all direct and indirect purchases of palm oil, joint ventures, acquisitions, and investments. This is necessary in order for downstream companies to identify those supply-chain partners that share and are actively upholding the values promised to end consumers.</p> <p>b. Supply-chain participation: It is currently unclear how companies that consume palm oil would support RSPO Next suppliers and purchase RSPO Next certified palm oil. We recommend against any procedure that would entail the development of a separate CSPO supply chain for RSPO Next palm oil. If the RSPO Next is to become the primary methodology for verifying the implementation of no-deforestation commitments, it must enable palm oil users and other concerned stakeholders to objectively evaluate the performance of certified suppliers. If RSPO Next simply becomes a certificate trading platform, it will not have the transparency of member performance underlying these certificates necessary to garner trust by the market. While we are not prescribing which data the RSPO should disclose, nor recommending that the RSPO rank its members performance, it should be data compiled and disclosed in a manner that allows end users and other engaged stakeholders to objectively evaluate and compare supplier performance against the RSPO Next standards.</p>
20	1-Oct-2015	<p>Scope: Consumers want assurance that the palm oil they purchase comes from companies committed to upholding sustainable production practices. The requirement of a company-wide policy in the review and decision for certifying suppliers as RSPO Next members is critically important, as it provides market recognition to those suppliers that are committed to go beyond the creation of isolated islands of sustainable practices by upholding sustainable practices across their entire operations. However, to credibly prove that a company is delivering on its no-deforestation policy, RSPO Next member companies should need to verify full compliance across their entire supply base, including all direct and indirect purchases of palm oil, joint ventures, acquisitions, and investments. This is necessary in order for downstream companies to identify those supply-chain partners that share and are actively upholding the values promised to end consumers.</p> <p>Supply-chain participation: It is currently unclear how companies that consume palm oil would support RSPO Next suppliers and purchase RSPO Next certified palm oil. We recommend against any procedure that would entail the development of a separate CSPO supply chain for RSPO Next palm oil.</p>
21	1-Oct-2015	<p>"We recognize that it is equally as important to have supply chains and programs that support delivery of these products through the refining, manufacturing and consumption portions of our supply chains." - Suggestion to reword the early part of this sentence to "We recognize that it is equally important to ..."</p>
22	28-Sep-2015	<p>Perhaps add something on empowering smallholders and independent growers to also effectively become part of this process.</p> <ul style="list-style-type: none"> • If an item is already part of the base RSPO P&C then it should be removed from this document - it will serve to confuse if it duplicates. • A commercial plantation operation is not and will not be a replacement for the government in social and environmental conservation programs for the general community. If the broader RSPO stakeholders want that to happen then we need good premiums flowing from downstream to upstream to fund it. • Criteria must be defined in way it can be implemented and auditable (evidence based with yes/no evaluation) • We want RSPO Next to be a high bar but also something that the leading minded companies aspire to and eventually adopt, not simply to state idealistic perfection that no other industry on the planet meets. • Only for extension of RSPO P&C? What about Supply Chain actors? How would the chain of custody work?
23	24-Sep-2015	<p>Scope: Consumers want assurance that the palm oil they purchase comes from companies committed to upholding sustainable production practices. The requirement of a company-wide policy in the review and decision for certifying suppliers as RSPO Next members is critically important, as it provides market recognition to those suppliers that are committed to go beyond the creation of isolated islands of sustainable practices by upholding sustainable practices across their entire operations. However, to credibly prove that a company is delivering on its no-deforestation policy, RSPO Next member companies should need to verify full compliance across their entire supply base, including all direct and indirect purchases of palm oil, joint ventures, acquisitions, and investments. This is necessary in order for downstream companies to identify those supply-chain partners that share and are actively upholding the values promised to end consumers.</p> <p>b. Supply-chain participation: It is currently unclear how companies that consume palm oil would support RSPO Next suppliers and purchase RSPO Next certified palm oil. We recommend against any procedure that would entail the development of a separate CSPO supply chain for RSPO Next palm oil.</p>
24	24-Sep-2015	<p>We would recommend that the RSPO clarify on how companies that purchase and use the palm oil can support RSPO Next suppliers and purchase RSP Next certified palm oil. We suggest that the certification mechanism be done within the current CSPO mechanisms already established so as to avoid any additional costs.</p>

25	24-Sep-2015	It would be good to clarify how companies that purchase and use the palm oil can support the RSPO Next suppliers and purchase certified RSPO Next certified palm oil from them. Furthermore, to avoid added costs, it would be of interest to do so within the current frame of the CSPO supply chain already established.
26	17-Sep-2015	Nil
27	15-Sep-2015	When will the eligibility guidelines be available? Is this the same as RSPO-RED? what does RSPO-RED have that this does not? Can this cover both?
28	19-Aug-2015	Good explanation, appreciate the boldness of the categories and highlighting them. Concise.
29	19-Aug-2015	Clear and understandable and really spells out the next strong steps to this program.
30	19-Aug-2015	Clear and understandable.
31	19-Aug-2015	Excellent and well written - all the categories of RSPO next are important to be rated and adhered to
32	17-Aug-2015	should be requirement for organisations to understand their GHG impact and commitment to reduce rather than just a simple requirement for reduction. Many organisations have already made notable improvements meaning any ongoing reductions will be smaller
33	10-Aug-2015	If this is audited at Mill level, does this mean a planter claims RSPO Next for only for each mill as it is audited and passes, or they must have all Mills assessed/passed to claim RSPO Next is met for them as a company. It is not clear when the requirements and guide to claims will be available - ideally this should form part of the same overall document, or be linked to a separate document

RSPO NEXT PUBLIC COMMENT

NO DEFORESTATION - POLICY - NDF1.1 Company has a public policy of no deforestation. The policy includes a commitment to not develop on areas of high carbon stock OR a moratorium on new development until an RSPO endorsed definition of HCS is agreed upon.

Answer Options	Response Count
	27

Number	Response Date	Response Text
1	Oct 8, 2015 12:06 PM	How will the RSPO endorsed definition of HCS be agreed?
2	Oct 6, 2015 5:04 PM	No comment.
3	Oct 6, 2015 4:19 PM	Inclusion of HCS areas is a critically important gap in the current RSPO standards that we are pleased to see the RSPO Next address. However, the RSPO needs to expediently adopt a consistent and objective definition that reflects best practice for conserving High Carbon Stock areas, in order for RSPO Next to be effective and accepted by the market.
4	Oct 6, 2015 3:43 PM	If the company commitment is to not develop on HCS, what assumptions do the criteria make about what methodology should be used, in the absence of an RSPO-endorsed definition?
5	Oct 6, 2015 3:24 PM	The socio-economic factor to be considered for The establishment of The policy.
6	Oct 6, 2015 2:55 PM	<p>- That there are few different groups looking at HCS within The industry and this indicator is too conclusive and without too much information to do it. We urge RSPO to consider The various data on HCS delivered before The HCS threshold is sealed. E.g. HCS Study, HCS Approach Working Group on highly forested areas.(this comment also applies to NDF2.1)</p> <p>Comments:</p> <p>1) Need more explanation for the word "OR", We Propose is as an option.</p> <p>2) When the RSPO will endorse the definition of HCS ?</p>
7	Oct 6, 2015 2:39 PM	NDF1.1- There is confusion here between 'no deforestation' and 'high carbon stock'. The policy requirement needs to be clearly linked to a widely accepted definition of HCS.
8	Oct 6, 2015 1:53 PM	NDF 1.1
		The "no-deforestation" policy needs to be better defined. Therefore proposed text for guidance: "The publicly available no-deforestation policy of the company clearly states how the company and its subsidiaries are implementing the no-deforestation policy throughout their operations."
		The required policy "to not develop on areas of high carbon stock" does not set a clear target. Who defines the threshold for HCS? There are currently the discussions on the HCS approach and the HCS study and there is not yet consensus. RSPO should take the lead again by adhering to a clear zero deforestation Standard and define a crystal clear baseline, eg. as defined in the HCS approach.
9	Oct 6, 2015 1:30 PM	Public policy of no deforestation for NEW DEVELOPMENTS. Otherwise, can be interpreted to apply to already developed areas - and require retrospective carbon assessments.
10	Oct 6, 2015 10:43 AM	<p>There is confusion here between 'no deforestation' and 'high carbon stock'. The policy requirement needs to be clearly linked to a widely accepted definition of HCS.</p> <p>We agree that consensus needs to emerge on a definition of HCS and more importantly how it will be implemented. The problem at the moment is that HCS+ is being developed as a 'carbon assessment proxy' and HCSA as an umbrella approach to forest conservation in the context of land use decision making. It is still not sure whether consensus between them will emerge. The RSPO should take a lead in trying to find complementarity rather than conflict between the two. Whilst we accept that the RSPO does need to endorse a 'single definition' of HCS it must ensure that there is broad consensus on that definition that most if not all stakeholders can sign up to rather than picking one or other of the ones currently being developed. Choosing one in a way that prevents the other from supporting it will not facilitate progress in implementing HCS methodologies.</p>
11	Oct 6, 2015 6:11 AM	I believe that 'no new development on HCS' and 'deforestation-free' are two different things, especially with reference to definitions/criteria of other NGOs. If the point (NDF1.1) is labeled no deforestation policy, I think the RSPO should use accepted criteria and verbiage for deforestation-free (vs. HCS), such as those developed by TFT.
12	Oct 6, 2015 1:50 AM	NDF1.1 As stated above, we believe it is imperative to adopt the High Carbon Stock Approach as the sole, credible and practical definition of high carbon stock forest that can be used in land-use planning to achieve zero deforestation.
13	Oct 5, 2015 11:55 PM	<p>Best practice in the industry is to use the HCS Approach to determine what forested areas deserve conservation and which lands are appropriate for development. As you are likely aware, since 2011, a variety of palm oil producers, including GAR, Wilmar, Cargill, and Musim Mas, have used the HCS Approach to determine which lands are appropriate for new plantation development. This HCS Approach also has wide support from a variety of NGOs as well as consumer goods businesses, including Avon, Danone, Colgate-Palmolive, Dunkin' Brands, Hershey Company, Mars, Nestlé, Clorox, Pepsi and Safeway. The HCS Approach is the only methodology that meets consumers' demands for a deforestation-free commitment and enjoys wide support from civil society and NGOs. Thus far, other definitions of "HCS", including that put forward by the Sustainable Palm Oil Manifesto group, fall short of what most NGOs consider to be a full zero deforestation commitment.</p> <p>NDF 1.1 does not define high carbon stock. A carbon based approach modeled after the SPOM is unacceptable. Recommended change: "The policy includes a commitment to not develop on High Carbon Stock forests, as defined by the High Carbon Stock Approach."</p>

14	Oct 5, 2015 8:22 PM	<p>proposed by POIG's HCS Approach) or three levels (as proposed by SPOM's HCS+ Approach). It is crucial that RSPO regains the lead in the carbon debate and sets one single own approach to HCS. Any HCS approach should integrate social dimensions from the outset.</p> <p>HCS is a cornerstone of implementing zero deforestation commitments in commodity supply chains. While HCS and forest conservation are important, they are not the only entry point to sustainable land use planning needed for developing sustainable palm oil plantings. To that end , we propose the following:</p> <ol style="list-style-type: none"> 1) Currently different definitions of HCS are being proposed and there is significant lack of clarity on actual implementation of HCS. We propose the development of a single definition of HCS that incorporates the best elements of the HCS Approach and the SPOM study. RSPO, we believe, is in the best position to reclaim the lead in this debate and develop one consolidated definition. 2) The definition of HCS should be based on an integrated land use planning approach that recognizes the multiple social and environmental values of forest ecosystems and wider multi-functional landscapes, and takes into account: <ul style="list-style-type: none"> • ecological value of forests/landscapes in terms of forest strata, forest carbon, ecosystem services and biodiversity • land rights of local communities and indigenous peoples • livelihoods of host communities and oil palm smallholders • food security needs of local host communities 3) HCS areas should be mapped using a combination of participatory mapping processes, social impact assessments and forest cover data from satellite imagery, GIS etc. 4) The process of land use decision-making should also be participatory and include key local stakeholders. This means that spatial maps that are developed based on the assessments should be presented transparently to local communities and the final land use decisions should involve inputs from all stakeholders. 5) Community land rights need to be respected regardless of whether areas are identified for development or for conservation. This means FPIC must apply in all cases. FPIC is not a one-off activity but is to be maintained over time. 6) Communities need to be involved in the management of areas set aside for conservation and community forestry approaches that empower local communities to sustainably manage forests should be considered as they address structural issues of natural resource governance and forest based livelihoods (see e.g, community forestry in Nepal -http://www.rightsandresources.org/documents/files/doc_2715.pdf) 7) A carbon neutrality approach to defining HCS that includes offsetting is extremely problematic and undermines the integrity of zero deforestation commitments. 8) HCS determination needs to be accompanied by a robust quality assurance process to ensure that the pitfalls associated with HCV assessments are avoided. 9) HCS assessment should be tied to measurable environmental and social indicators in all cases that need to be monitored, reported and verified over time. <p>A first step to integration of HCS into broader planning of the implementation of “no deforestation, no peat, no exploitation” pledges might be to broaden and strengthen the HCV assessment which significantly overlaps with HCS assessments and develop an HCV+ approach that includes a more robust assessment of forest carbon and social impacts. That said, given the prior weaknesses of HCV assessments, the quality assurance process would need to be strengthened for this to be a robust mechanism. Integrating HCS within HCV would also make the HCS assessment more practical, streamlined and avoid unnecessary duplication.</p> <p>Carbon, conservation, land tenure, smallholder inclusivity, demand growth do not exist in silos. Therefore, a next step is the integration of the pledges into a holistic land use planning approach; this would combine (high values for) conservation with (high values for) development needs. More comprehensive land use planning would lead to developing the commitments and plans governed by “no deforestation, no peat, no exploitation” into positive sustainable growth scenarios at a landscape or jurisdictional level.</p>
15	Oct 5, 2015 3:55 PM	No Comment
16	Oct 5, 2015 7:54 AM	No comment.
17	Oct 5, 2015 3:10 AM	<ol style="list-style-type: none"> 1) Need more explanation for the word "OR" our offer is as an option. 2) When RSPO endorse definition of HCS ?
18	Oct 2, 2015 4:12 PM	No comment
19	Oct 1, 2015 5:38 PM	Inclusion of HCS areas is a critically important gap in the current RSPO standards that we are pleased to see the RSPO Next address. However, the RSPO needs to expediently adopt a consistent and objective definition that reflects best practice and meets public expectations for conserving High Carbon Stock areas, in order for RSPO Next to be effective and accepted by the market.
20	Oct 1, 2015 6:23 AM	No comment
21	Sep 28, 2015 4:09 AM	•What definition of high carbon stock will be accepted in the meantime?
22	Sep 17, 2015 3:17 AM	Nil
23	Aug 19, 2015 2:39 PM	No comment.
24	Aug 19, 2015 2:36 PM	I am pleased to see this! Glad there is an "OR" to give a chance to define HCS.
25	Aug 19, 2015 12:03 PM	no comment
26	Aug 17, 2015 11:30 AM	difficult as too simplistic
27	Aug 10, 2015 7:03 AM	Is the High Carbon Stick ("HCS") referred to here in this document the Greenpeace/TFT standard or any definition of HCS can be used ?

RSPO NEXT PUBLIC COMMENT

NO DEFORESTATION - PLANTINGS - NDF2.1 New plantations shall only be established on mineral soils and in low carbon stock areas. Low carbon stock areas are currently defined by the RSPO as those areas with (above and below ground) carbon stores, where the losses as a result of conversion (to oil palm) are equal or smaller to the gains in carbon stock within the new development area, including set aside areas (non-planted areas), over the period of one rotation.

Answer Options	Response Count
	25

Number	Response Date	Response Text
		This reflects the agreement in principle at the conclusion of RSPO GHG WG2 and the P&C Review (however it was included only in Guidance there).
		In terms of the RSPO endorsed methodology to determine high carbon stock, and therefore also define low carbon stock:
		We are favourable towards the HCS Approach, as it is more practical at landscape planning level, was developed by a multi-stakeholder approach including NGOs and falls in line with this indicator.
1	Oct 8, 2015 12:06 PM	The HCS+ "science study", in contrast, reflects this indicator only in its lower level category, but for the "potentially developable" middle category relies on artificial carbon emission thresholds that appear to be anything from 50% to 3 times (300%) higher than this indicator.
2	Oct 6, 2015 5:04 PM	Suggest that as well as 'new plantations' this covers all new operations, including infrastructure development.
3	Oct 6, 2015 3:43 PM	For this commitment to be implemented, an agreed methodology must be made available to calculate both above and below ground carbon stocks. Reference values should be made available for carbon stocks in oil palm plantings. - That there are few different groups looking at HCS within the industry and this indicator is too conclusive and without too much information to do it. We urge RSPO to consider the various data on HCS delivered before the HCS threshold is sealed. E.g. HCS Study, HCS
4	Oct 6, 2015 3:24 PM	Approach Working Group on highly forested areas. Comments: 1) Need the definition of " new plantations" and when it the cut of date?
5	Oct 6, 2015 2:55 PM	2) We propose replanting exclude on RSPO Next Requirement?
6	Oct 6, 2015 2:39 PM	[NDF2.1] Low carbon stock areas: Recommend that RSPO NEXT utilise the outcomes of the current HCS Approach and SPOM convergence process. Currently the approach taken in NDF2.1 is not defined as HCS, and is therefore confusing. Current draft wording in NEXT takes a different approach (net zero emissions over one rotation) and implies that the cutoff limit is 35tC/ha. The approach used in NEXT needs to be much more clearly linked to the existing initiatives to define HCS.
7	Oct 6, 2015 1:53 PM	With regard to NDF 2.1 and the guidelines RSPO is currently having it must be avoided that there are different and possibly contradicting regulations in place. This applies also to the different cut-off dates which in all abovementioned initiatives are different. RSPO should seek an alignment in all those initiatives that not everyone is operating with different dates. Plantings [NDF2.1] Low carbon stock areas: Recommend that RSPO NEXT utilise the outcomes of the current HCS Approach and SPOM convergence process. Currently the approach taken in NDF2.1 is not defined as HCS, and is therefore confusing. Current draft wording in NEXT takes a different approach (net zero emissions over one rotation) and implies that the cut off limit is 35tC/ha. The approach used in NEXT needs to be much more clearly linked to the existing initiatives to define HCS. Direct & Indirect impacts [NDF2.1] Wording on who undertakes HCV assessments needs to be aligned with NPP requirements (currently under public consultation). According to draft NPP - HCV ALS Licensed assessors only allowed & if area is less than 500ha, then can be done internally. This indicator is redundant (as already part of NPP)
8	Oct 6, 2015 1:30 PM	Comment: Low carbon stock is defined here, which contradicts NDF 1.1 which says that RSPO has yet to endorse a definition of high carbon stock.
9	Oct 6, 2015 12:39 PM	We welcome this indicator. A zero-net GHG threshold for a new development is robust and logical so long as it sits alongside existing requirements for HCV conservation, FPIC, etc .
10	Oct 6, 2015 10:43 AM	Currently RSPO does not have any default values for set aside areas. RSPO should provide default value for the set aside areas to enable computation of carbon stock values before and after conversion.
11	Oct 6, 2015 9:48 AM	I agree, as long as a certified third party assessor confirms whether or not areas meet the criteria/formula for low carbon stock.
12	Oct 6, 2015 6:11 AM	
13	Oct 6, 2015 1:50 AM	NDF 2.1 This also does not refer to the High Carbon Stock Approach; we would suggest "New plantations should only be established on mineral soils, and in low carbon areas as defined by the High Carbon Stock Approach." We encourage RSPO to work actively in driving single, aligned HCS definition and methodology with the NGO/Industry groups
14	Oct 6, 2015 12:26 AM	The unique situation and limited resource for independent smallholder group should be taken into account in developing the HCS assessment methodology and GHG calculation tool NDF 2.1 does not protect High Carbon Stock forests as defined by the High Carbon Stock Approach. There is no explicit mention of a ban on expansion of peatlands; while peat is mentioned in PT1.1, the inclusion of a reference to mineral soils here could be strengthened by reference to peatlands as well. Recommended change: "New plantations shall only be established on mineral soils. New plantations shall not be established on
15	Oct 5, 2015 11:55 PM	peatlands of any depth or on High Carbon Stock forests, as defined by the High Carbon Stock Approach."
16	Oct 5, 2015 3:55 PM	No Comment
17	Oct 5, 2015 7:54 AM	No comment. 1) Definition of " new plantations" and when it cut of date?
18	Oct 5, 2015 3:10 AM	2) How with plantation which is be replanting ?

19	Oct 2, 2015 4:12 PM	This implies that you cannot develop on any organic soils, even if they do not meet the definition of peat (ie. 65% organic matter content). I would suggest to change the wording to 'New plantings shall only be established in low carbon stock areas'
20	Oct 1, 2015 6:23 AM	No comment
21	Sep 28, 2015 4:09 AM	This statement will ultimately be replaced with the HCS definition adopted.
22	Sep 17, 2015 3:17 AM	Nil
23	Aug 19, 2015 2:39 PM	No comment.
24	Aug 19, 2015 12:03 PM	no comment
25	Aug 17, 2015 11:30 AM	no

RSPO NEXT PUBLIC COMMENT

NO DEFORESTATION - PLANTINGS - NDF2.2 Carbon emissions from land use change shall be publicly reported for all new plantings, and the company shall publicly report annually all future operational emissions. (An RSPO Carbon Assessment Tool is currently under development and evaluation until 2016 and anticipated to be the one used once finalized.)

Answer Options	Response Count
	19

Number	Response Date	Response Text
1	Oct 8, 2015 12:06 PM	This is a good measure, but reporting should not be limited to carbon emissions from land use change, it should also include biodiversity and free prior and informed consent of communities and have regard to social and cultural values.
2	Oct 6, 2015 5:04 PM	Does all reporting under RSPO NEXT mean reporting to the RSPO or public reporting by companies? Reporting to the RSPO would offer the chance for the RSPO to aggregate data and analyse its impacts - as well as this offering the opportunity for companies to demonstrate their own impacts.
3	Oct 6, 2015 3:56 PM	Type of land use change shall be defined. It is presumed that direct land use change is being referred to?
4	Oct 6, 2015 3:43 PM	No comments. Comments:
5	Oct 6, 2015 2:55 PM	1) Where the report will published? In the RSPO website or in Company website itself ? 2) We propose : GHG emission will be publish but without LUC Analysis report. NDF 2.2 It is unclear what is included in "all future operational emissions". For the sake of clarity we propose text: "Carbon emissions from land use change shall be publicly reported for all current and new plantings, and the company shall publicly report annually all future operational Emissions with regard to land use change. The company also develops a step-wise plan to further reduce emissions. (An RSPO Carbon Assessment Tool is currently under development and evaluation until 2016 and anticipated to be the one used once finalized.)"
6	Oct 6, 2015 1:53 PM	All other emissions will be covered in the GHG chapter. We very much welcome the requirement for public reporting of emissions. This indicator would be improved if Palm GHG was required as the tool to calculate and report emissions so that all defaults and methodologies
7	Oct 6, 2015 10:43 AM	would be consistent and comparison between members would be easier.
8	Oct 6, 2015 6:11 AM	I agree NDF 2.2 This criterion requiring publicly reported carbon emissions from a proposed planting to be included in the New Planting Procedures, "anticipates" using the RSPO Carbon Assessment Tool currently under
9	Oct 6, 2015 1:50 AM	evaluation. However, this tool does not set a threshold for carbon stocks, and has been developed to identify and mitigate carbon stock changes and GHG emissions associated with oil palm development. We would recommend adding a threshold for which an area of potential new development, to lend greater credibility to the reporting requirement. In the requirement to report "all future operational emissions" it is not clear if these refer to both mill operations (POME and mill energy use ao) and plantation operations (fertilisers ao) as well as to land use change (one-
10	Oct 5, 2015 8:22 PM	off clearing and ongoing emissions from (peat)soil).
11	Oct 5, 2015 3:55 PM	No Comment
12	Oct 5, 2015 7:54 AM	It will be helpful if can specify the LUC is from waht to Oil Palm OR from any crop/growth to Oil Palm. 1) Where the report will publish, which is in RSPO website or enough in Company website itself ?
13	Oct 5, 2015 3:10 AM	2) Our offering that only GHG emission will be publish and without LUC Analysis.
14	Oct 2, 2015 4:12 PM	No comment
15	Oct 1, 2015 6:23 AM	No comment
16	Sep 17, 2015 3:17 AM	Nil
17	Aug 19, 2015 2:39 PM	No comment.
18	Aug 19, 2015 12:03 PM	no comment
19	Aug 17, 2015 11:30 AM	So long as not overcomplicated

RSPO NEXT PUBLIC COMMENT

NO DEFORESTATION - DIRECT & INDIRECT IMPACTS - NDF3.1 Independent and HCV Resource Network ALS licensed assessors shall be used for all new plantings. (From January 2015).

Answer Options	Response Count
	18

Number	Response Date	Response Text
		As long as HCV assessments are to be used as a proxy for biodiversity and social values, this makes sense.
1	Oct 8, 2015 12:06 PM	A question for RSPO to address: are there sufficient numbers of licensed assessors to deliver this; and if not how will RSPO contribute to developing and training of more HCV assessors to ensure audit costs do not rocket?
2	Oct 6, 2015 5:04 PM	In the communications around RSPO next, in the final document, it might be worth including communication alongside the different criteria, on what is existing in P&C guidance and what is additional through RSPO NEXT.
3	Oct 6, 2015 3:56 PM	'Independent and HCV Resource Network ALS licensed assessors'. Does 'ALS' stand for 'as'?
4	Oct 6, 2015 3:43 PM	No comments.
5	Oct 6, 2015 2:55 PM	Comments: 1) We propose wording independent delete and only ALS licensed assessors. Direct & Indirect impacts
6	Oct 6, 2015 1:30 PM	[NDF2.3] Suggest to remove. Unclear what the company needs to do to demonstrate compliance. Already captured in HCV Management indicators in RSPO P&C (2013) and also in NDF 2.2 NDF3.1: We welcome this move to assure the highest quality of HCV assessments.
7	Oct 6, 2015 10:43 AM	
8	Oct 6, 2015 6:11 AM	I agree
9	Oct 5, 2015 3:55 PM	No Comment
10	Oct 5, 2015 7:54 AM	Good idea. But even their HCV assessments are questioned by Stakeholders. So is the Independent and HCV Resource Network ALS licensed assessors is sufficient?
11	Oct 5, 2015 3:10 AM	1) Should word of " independent" erased, because the important is ALS licensed assessors.
12	Oct 2, 2015 4:12 PM	add in 'to conduct HCV assessments'
13	Oct 1, 2015 6:23 AM	No comment
14	Sep 28, 2015 4:09 AM	• Independent and HCV Resource Network ALS licensed assessors shall be used for all new plantings. (From January 2015). - Due diligence of
15	Sep 17, 2015 3:17 AM	Nil
16	Aug 19, 2015 2:39 PM	No comment.
17	Aug 19, 2015 12:03 PM	no comment
18	Aug 17, 2015 11:30 AM	yes

RSPO NEXT PUBLIC COMMENT

NO DEFORESTATION - DIRECT & INDIRECT IMPACTS - NDF3.2The company shall demonstrate efforts to develop HCV management plans at a landscape level, in collaboration with other stakeholders active in that landscape. Opportunities for landscape management shall also be considered when they appear during the life of the project. Such collaborative plans and areas shall include but are not limited to: Creating habitat corridors wherever practical to contribute to maintaining and/or enhancing an HCV Collaborative threat control, e.g. patrols to prevent illegal encroachment and poaching (The RSPO recognizes that it might be that such collaboration is not possible at the time of the development of the project.)

Answer Options	Response Count
	21

Number	Response Date	Response Text
1	Oct 8, 2015 12:06 PM	This is an extremely important and much needed indicator. Therefore, consider strengthening it beyond "demonstrating efforts to" towards actually having landscape management plans in place. As well as collaborative management, I think this should advise on collaborative reporting and or at least requirements for aggregating data for assessment of reported data as a whole, to then inform adaptive, collaborative management efforts.
2	Oct 6, 2015 5:04 PM	As RSPO NEXT also includes HCS requirements - should management plans and monitoring also be required for HCS areas? (The RSPO recognized that it might be that such collaboration is not possible at the time of the development of the project.)
3	Oct 6, 2015 3:56 PM	It is suggested to eliminate the brackets. Secondly, it is suggested that this sentence be qualified to minimize the inherent counter productivity in its present form by adding 'nevertheless, companies are still encouraged to explore and document evidences of such initiatives'
4	Oct 6, 2015 3:43 PM	The wording of this criterion could be more strict: "demonstrating efforts to develop plans" does not necessarily lead to anything on the ground. At the very least - how should companies best demonstrate these efforts? Collaborative threat control must include the risk of fire.
5	Oct 6, 2015 3:24 PM	NDF3.2 - To clearly define the scope and scale of "landscape" **To include "where possible" -
6	Oct 6, 2015 2:55 PM	The company shall demonstrate efforts to develop HCV management plans at a landscape level, in collaboration with other stakeholders active in that landscape where possible. Comments: 1) What kind of collaboration and when it to do ?
7	Oct 6, 2015 1:53 PM	NDF 3.2. It is understood that collaboration might not be possible. However, the Company needs to prove and document what they have done to start such collaborations: Proposed text for guidance: The Company documents and lines out all efforts it has taken to start collaborations in the landscape, also to ensure that HCV areas are connected (e.g. through habitat restoration), corridors are conserved and to create buffer zones around HCV areas. Also water courses and wetlands needs to be protected, including maintaining and restoring appropriate riparian and other buffer zones (eg. invitation and documentation of meetings with all stakeholders in the landscape). In case currently no collaboration is possible the company clearly outlines the reasons and state what they can do to overcome such challenges.
8	Oct 6, 2015 12:39 PM	Comment: NDF3.2 - suggest add in glossary to define/guide what is 'landscape level'
9	Oct 6, 2015 10:43 AM	NDF3.2: We welcome this indicator.
10	Oct 6, 2015 6:11 AM	I agree with everything in this section except the italicized sentence in parenthesis, which I think should be omitted.
11	Oct 5, 2015 3:55 PM	A definition of "landscape level" is needed so that companies do not limit the scope of the landscape to just the periphery of their boundaries.
12	Oct 5, 2015 7:54 AM	No comment. 1) What kind of collaboration and when it to do ?
13	Oct 5, 2015 3:10 AM	2) Our offer about the collaboration with stakeholder is enough HCV Management Plan only.
14	Oct 2, 2015 4:12 PM	No comment
15	Oct 1, 2015 6:23 AM	No comment
16	Sep 17, 2015 3:17 AM	Nil
17	Sep 15, 2015 11:53 AM	how will this be measured? In the bullet...Creating habitat corridors... I would revise to read: Creating, maintaining and assessing habitat corridors wherever...
18	Aug 19, 2015 9:47 PM	The sentence about RSPO recognizing that it might be that such...is there a timeline in place for implementation?
19	Aug 19, 2015 2:39 PM	No comment.
20	Aug 19, 2015 12:03 PM	no comment
21	Aug 17, 2015 11:30 AM	better

RSPO NEXT PUBLIC COMMENT

NO DEFORESTATION - DIRECT & INDIRECT IMPACTS - NDF3.3 Measures shall be in place to mitigate and reduce indirect pressure on forests and/or Natural Habitats that would result from plantation development.

Answer Options	Response Count
	22

Number	Response Date	Response Text
1	Oct 8, 2015 12:06 PM	Guidance may be needed as to what might be regarded as appropriate measures.
2	Oct 6, 2015 5:04 PM	Are there examples that can be included here?
3	Oct 6, 2015 3:43 PM	Seems complicated to implement - how to assess and quantify "indirect pressure on forest", and what rules should be followed to come up with mitigation plans? Criterion needs extensive guidance.
4	Oct 6, 2015 3:24 PM	NDF3.3-To define "indirect pressure" Comments: 1) Need more explanation for kind of measurement which is, measurement land cover or biodiversity?
5	Oct 6, 2015 2:55 PM	2) The company is free to determine type of measurement which is depend with necessary of conservation and habitat condition. NDF 3.3.
6	Oct 6, 2015 1:53 PM	This is very desirable and we fully support this. However, RSPO should develop and support guidance how this can be achieved by the Companies.
7	Oct 6, 2015 12:39 PM	Comment: NDF3.3 - suggest add in glossary to define 'indirect' pressure NDF3.3: We welcome this indicator. The RSPO should develop additional guidance on how to plan new developments to reduce indirect pressures on forest and other natural habitats: Ensuring optimum productivity of planned operations; Establishing minimum recommended set-aside areas?
8	Oct 6, 2015 10:43 AM	Other?
9	Oct 6, 2015 9:48 AM	To provide clearer guidance on what is meant by indirect pressure
10	Oct 6, 2015 6:11 AM	Examples might be good here NDF 3.3 does not explicitly offer guidance for how to mitigate and reduce indirect pressure on forests and/or Natural Habitats that would result from plantation development. A standard is needed for measuring and mitigating these pressures. Recommended change: Measures, to be defined by RSPO NEXT Eligibility guidelines and to include stakeholder engagement, shall be in place to mitigate and reduce indirect pressure on
11	Oct 5, 2015 11:55 PM	forests and/or Natural Habitats that would result from plantation development.
12	Oct 5, 2015 3:55 PM	No Comment
13	Oct 5, 2015 7:54 AM	It will be helpful to provide definations for "Forest" because different stakeholder have different interpretation. 1)Need more explanation for kind of measurement which is, what is about land cover or biodiversity?
14	Oct 5, 2015 3:10 AM	2)The company is free to determine type of measurement which is depend with necessary of conservation and habitat condition.
15	Oct 2, 2015 4:12 PM	Growers should be given examples of the types of actions expected
16	Oct 1, 2015 6:23 AM	"to mitigate and reduce indirect pressures.." -- based on what? EIAs or other mechanisms?
17	Sep 17, 2015 3:17 AM	Nil
18	Sep 15, 2015 11:53 AM	how will this be measured?
19	Aug 19, 2015 2:39 PM	No comment.
20	Aug 19, 2015 12:03 PM	no comment
21	Aug 17, 2015 11:30 AM	yes
22	Aug 10, 2015 7:03 AM	This is a very unspecific comment - perhaps 1/2 examples should be included

RSPO NEXT PUBLIC COMMENT

NO DEFORESTATION - DIRECT & INDIRECT IMPACTS - NDF3.4 Companies shall show evidence that they are managing and protecting areas deemed unsuitable for oil palm development in areas under their control because of the magnitude of potential negative impacts. They shall not initiate excision of such land from their Management Units unless they can assure the long term conservation of any HCV's present on such land.

Answer Options	Response Count
	24

Number	Response Date	Response Text
1	Oct 8, 2015 12:06 PM	It is hoped that this indicator can help support companies in their negotiations with authorities regarding excision of land.
2	Oct 6, 2015 5:04 PM	Consider extending this principle to include areas where there is land conflict?
3	Oct 6, 2015 3:43 PM	Can this include 'deemed unsuitable in accordance with the requirements of the RSPO Standard and RSPO NEXT' to specify that 'unsuitable' includes HCV/HCS areas etc? Companies will have to negotiate with regional authorities, that excision of such land will not be done by same authorities.
4	Oct 6, 2015 1:53 PM	NDF 3.4. We fully confirm this principle. However, we strongly suggest that this principle must apply for excising or disinvesting land with ongoing land conflict. Proposed text: "They shall not initiate excision of such land from their Management Units unless they can assure the long term conservation of any HCV's present on such land. This also explicitly applies to the resolution of any conflicts on such land."
5	Oct 6, 2015 1:30 PM	Direct & Indirect impacts [NDF3.4] This needs to apply to HCV and HCS.
6	Oct 6, 2015 12:39 PM	Comment: Set-asides could be taken back by the government. Please address this concern.
7	Oct 6, 2015 12:00 PM	Please define 'under their control'. HCV and HCS areas identified on a company's concession may still be under the rights of local communities and the company will have limited control and protection over such areas. NDF 3.4: HCS forests, riparian zones, and peatlands should be included in the areas warranting conservation protections in member companies' Management Units.
8	Oct 6, 2015 10:43 AM	NDF3.4: We welcome this indicator. We particularly welcome effort to address the unwelcome excision of HCVs - but we are not sure if mechanisms exist particularly in Indonesia to allow 'conservation burdens' to be attached to land.
9	Oct 6, 2015 6:11 AM	I agree NDF 3.4 seems to indicate that the only areas deserving of management/protection that are unsuitable for palm oil development that cannot be excised from their Management Units are HCVs; however, peatlands, HCS forests, and other unsuitable areas for palm oil development should also be included. Recommended change: "they shall not initiate excision of such land from their Management Units unless they can ensure the long term conservation of any peatlands, HCS forests, riparian zones and HCVs present on such land".
10	Oct 5, 2015 11:55 PM	RSPO NEXT should also be more explicit about asking for management plans for areas set-aside for conservation. Recommended change: change language from "Companies shall show evidence that they are managing and protection areas deemed unsuitable for oil palm development" to "Companies should provide public management plans for areas set-aside for conservation, including peatlands, riparian areas, HCVs and High Carbon Stock forests."
11	Oct 5, 2015 8:22 PM	Companies shall not initiate excision of land unless long term conservation of any HCVs can be assured. The same principle must apply for excising or disinvesting land with ongoing land conflict. Text suggestion: "unless they can assure the long term conservation of any HCVs present on such land, as well as the resolution of any conflicts on such land."
12	Oct 5, 2015 3:55 PM	No Comment
13	Oct 5, 2015 7:54 AM	No comment.
14	Oct 1, 2015 5:38 PM	HCS forests, riparian zones, and peatlands should be included in the areas warranting conservation protections in member companies' Management Units.
15	Oct 1, 2015 2:52 PM	HCS forests, riparian zones, and peatlands should be included in the areas warranting conservation protections in member companies' Management Units.
16	Oct 1, 2015 6:23 AM	No comment (apart from removing the apostrophe after HCV in the final sentence
17	Sep 28, 2015 4:09 AM	•This depends on land acquisition and ultimately HGU for Indonesia. Of course companies that care about HCV will try to avoid HCV in their land acquisition and ultimately licensing process. NDF 3.4: HCS forests, riparian zones, and peatlands should be included in the areas
18	Sep 24, 2015 10:01 PM	warranting conservation protections in member companies' Management Units.
19	Sep 24, 2015 10:06 AM	HCS forests, riparian zones and peatlands should also be included in conservation protection areas in member companies' Management Units, in addition to HCV's.
20	Sep 24, 2015 10:01 AM	HCS forests, riparian zones, and peatlands should also be included as areas warranting conservation protections in addition to HCV's in member companies' Management Units.
21	Sep 17, 2015 3:17 AM	Nil
22	Aug 19, 2015 2:39 PM	No comment.
23	Aug 19, 2015 12:03 PM	no comment
24	Aug 17, 2015 11:30 AM	yes

RSPO NEXT PUBLIC COMMENT

GENERAL COMMENTS REGARDING NO DEFORESTATION Please use this section to provide any comments regarding technical content, clarity of language, consistency with other RSPO requirements and any other relevant comments.

Answer Options	Response Count
----------------	----------------

	18
--	----

Number	Response Date	Response Text
1	Oct 8, 2015 12:06 PM	RSPO Next indicators should distinguish between the existence of corporate policies, management plans etc and actual performance and implementation on the ground, the latter being the main objective.
2	Oct 6, 2015 5:04 PM	No comment. Unilever strongly supports the development of a set of criteria that companies with no deforestation commitments can use to demonstrate their progress. However, until there is agreement on meaningful and widely-shared definition of high carbon stock forest, the proposed criteria cannot be implemented effectively.
3	Oct 6, 2015 3:43 PM	It will be beneficial for producers to support one harmonized approach which includes the integration of HCS criteria into the HCV tool, and a further strengthening of the guidance for HCV implementation. The process of identification and maintenance of HCV set-aside areas needs to be made transparent.
4	Oct 6, 2015 2:39 PM	General: The content of the section should not be characterised as 'no deforestation'. This concept is not interchangeable with HCS and HCV. Recommend changing this title to 'HCS and HCV' or similar.
5	Oct 6, 2015 1:30 PM	The content of the section should not be characterised as 'no deforestation'. This concept is not interchangeable with HCS and HCV. Recommend changing this title to 'HCS and HCV' or similar.
6	Oct 6, 2015 12:00 PM	General Comments: Inclusion of HCS areas is a critically important gap in the current RSPO standards that we are pleased to see the RSPO Next address. However, the RSPO needs to expediently adopt a consistent and objective definition that reflects best practice for conserving High Carbon Stock areas, in order for RSPO Next to be effective and accepted by the market.
7	Oct 5, 2015 3:55 PM	No Comment
8	Oct 5, 2015 7:54 AM	Please see above.
9	Oct 1, 2015 5:38 PM	The RSPO needs to facilitate the harmonization of approaches for protecting HCS areas and rapidly adopt a consistent and objective methodology that reflects best practice for how companies should go about managing these areas.
10	Oct 1, 2015 2:52 PM	Inclusion of HCS areas is a critically important gap in the current RSPO standards that we are pleased to see the RSPO Next address. However, the RSPO needs to expediently adopt a consistent and objective definition that reflects best practice for conserving High Carbon Stock areas, in order for RSPO Next to be effective and accepted by the market.
11	Oct 1, 2015 6:23 AM	No comment
12	Sep 24, 2015 10:01 PM	General Comments: Inclusion of HCS areas is a critically important gap in the current RSPO standards that we are pleased to see the RSPO Next address. However, the RSPO needs to expediently adopt a consistent and objective definition that reflects best practice for conserving High Carbon Stock areas, in order for RSPO Next to be effective and accepted by the market.
13	Sep 24, 2015 10:06 AM	While we are content that the RSPO has included HCS areas into the RSPO Next, we believe that it is equally important to adopt a definition of HCS that takes into consideration best practices for conserving HCS areas. In doing so, we believe that the RSPO Next will be more effective in and better accepted by the market.
14	Sep 24, 2015 10:01 AM	While we are happy that the RSPO has included HCS areas, we would further recommend that the RSPO agree up on an endorsed definiton of HCS that most takes into consideration the best practices for conserving HCS areas. We believe that in doing so, the RSPO Next would be more effective and better accepted by the market.
15	Aug 19, 2015 2:39 PM	This will make a difference and the language is fair and clear.
16	Aug 19, 2015 2:36 PM	Glad this is the next, strong step!
17	Aug 19, 2015 12:03 PM	there are so many levels to this section - consider reducing the number above as it seems it could become confusing
18	Aug 17, 2015 11:30 AM	this needs careful consideration so as to be seen as a step fopward by the NGO's without discouraging membership of all interested parties

RSPO NEXT PUBLIC COMMENT

NO USE OF FIRE - PREVENT & CONTROL FIRES - NFR1.1 There shall be no use of fire in new or ongoing operations for land preparation, land management, waste management or any other reason.

Answer Options	Response Count
	14

Number	Response Date	Response Text
1	Oct 8, 2015 12:07 PM	No comment
2	Oct 6, 2015 5:12 PM	No comment.
3	Oct 6, 2015 3:44 PM	We support this more explicit reference to no burning than in the RSPO P&Cs.
4	Oct 6, 2015 3:25 PM	NFR1.1 - Concern on the wording "any other reason" which may limit in exploring new technology in waste management such as biochar. NFR1.1:
5	Oct 6, 2015 10:43 AM	We welcome this indicator.
6	Oct 6, 2015 6:17 AM	I feel this is critical. The verbiage in the existing P & C is clear in some parts but in other parts simply says "avoid the use of fire", which I feel is unacceptable.
7	Oct 5, 2015 3:58 PM	regardless of laws in place in the region of the plantation.
8	Oct 5, 2015 7:59 AM	No comment.
9	Oct 2, 2015 4:14 PM	No comment
10	Oct 1, 2015 6:37 AM	No comment
11	Sep 17, 2015 3:18 AM	Nil
12	Aug 19, 2015 2:39 PM	No comment.
13	Aug 19, 2015 12:04 PM	great
14	Aug 17, 2015 11:30 AM	yes

RSPO NEXT PUBLIC COMMENT

NO USE OF FIRE - PREVENT & CONTROL FIRES - NFR1.2 Companies shall have procedures and facilities to monitor and combat fire on land they manage and in the immediate vicinity of the estates, in coordination with communities, and document management responses to prevent and put out fires. Resources such as the WRI Global Forest Watch Tool are suggested as monitoring aids.

Answer Options	Response Count
	17

Number	Response Date	Response Text
1	Oct 8, 2015 12:07 PM	No comment
2	Oct 6, 2015 5:12 PM	Could this also include requirements for 'collaborative' approaches to fire monitoring and management as with in the deforestation indicators? Rather than WRI Global Forest Watch, should this specify NASA Hotspot data as this also displayed elsewhere?
3	Oct 6, 2015 3:57 PM	'Companies shall have procedures and facilities to monitor and combat fire on land they manage and....'. It is suggested that the word 'prevent' should also be reflected in the quoted sentence.
4	Oct 6, 2015 3:44 PM	Also it is suggested that monitoring aid should not be limited only to the WRI Global Forest Watch Tool unless a very specific reason makes it the tool of choice. No comments.
5	Oct 6, 2015 3:25 PM	NFR1.2 - Practical constraint in coordinating with the communities beyond certain distance from our boundaries. Definition needed on a cut-off distance practically as reasonable. (as far as reasonably practicable)
6	Oct 6, 2015 1:55 PM	NFR 1.2. "in the immediate vicinity of the estates" needs much clearer definitions. It is a corridor of 5 Metres around the estate or of 5km around the estate? Therefore proposed text for guidance: The collaboration within the landscape as lined out in NDF 3.2. explicitly includes agreements towards supportive actions taken by the Company in the case of fires in the vicinity - with a clear definition about the vicinity - of their estates. NFR2.1:
7	Oct 6, 2015 10:43 AM	We welcome this indicator.
8	Oct 6, 2015 6:17 AM	I agree
9	Oct 5, 2015 3:58 PM	No Comment
10	Oct 5, 2015 7:59 AM	Please consider to include..... required fire fighting equipments.aspecially to handle fire in the plantation area miles away from the office area.and other facilities.
11	Oct 2, 2015 4:14 PM	No comment
12	Oct 1, 2015 6:37 AM	Emphasis could be on prevention. Suggestion: "Companies shall have procedures to prevent fires and facilities (or equipment?) to monitor and combat fire on ..."
13	Sep 28, 2015 4:09 AM	• In coordination with communities and local government.
14	Sep 17, 2015 3:18 AM	Nil
15	Aug 19, 2015 2:39 PM	No comment.
16	Aug 19, 2015 12:04 PM	excellent
17	Aug 17, 2015 11:30 AM	yes

RSPO NEXT PUBLIC COMMENT

GENERAL COMMENTS REGARDING NO USE OF FIRE Please use this section to provide any comments regarding technical content, clarity of language, consistency with other RSPO requirements and any other relevant comments.

Answer Options	Response Count
----------------	----------------

	13
--	----

Number	Response Date	Response Text
1	Oct 8, 2015 12:07 PM	No comment
2	Oct 6, 2015 3:44 PM	Criteria should include adequate management of water tables in the concessions during dry periods, to manage and prevent the spread of fires within concessions.
3	Oct 6, 2015 2:39 PM	Support clarifications provided on fire - this is needed. Prevent & control fires
4	Oct 6, 2015 1:30 PM	Agree to clarifications provided on fire - much needed.
5	Oct 5, 2015 3:58 PM	No Comment
6	Oct 5, 2015 7:59 AM	No comment.
7	Oct 1, 2015 5:38 PM	no comments
8	Oct 1, 2015 6:37 AM	In suggesting monitoring aids such as the one available via WRI, a suggestion is to add the need for companies to hire or train existing staff to handle data that comes from such tools.
9	Sep 24, 2015 10:06 AM	We are happy with the proposed statements.
10	Sep 17, 2015 3:18 AM	Nil
11	Aug 19, 2015 2:39 PM	The accountability is integral.
12	Aug 19, 2015 12:04 PM	this is a very important component
13	Aug 17, 2015 11:30 AM	we are not planters bust feel this area needs addressing

RSPO NEXT PUBLIC COMMENT

NO NEW PLANTING ON PEAT OF ANY DEPTH - PT1.1 There shall be no new development on peat regardless of depth or extent for any new development after Nov 2015 NOTE: Peat is defined in the RSPO peatland mgmt documentation.

Answer Options	Response Count
	15

Number	Response Date	Response Text
1	Oct 8, 2015 12:07 PM	We welcome the clarity of this indicator.
2	Oct 6, 2015 5:12 PM	No comment.
3	Oct 6, 2015 3:46 PM	No comments. PT1.1:
4	Oct 6, 2015 10:43 AM	We welcome this indicator.
5	Oct 6, 2015 6:26 AM	I agree PT 1.1 We would recommend that this criterion be amended to read "there shall be no new development on peat of any depth, nor soils with an organic layer greater than 15cm as per the recommendation of the HCS
6	Oct 6, 2015 1:51 AM	study."
7	Oct 5, 2015 3:58 PM	No Comment Also consider:
8	Oct 5, 2015 8:02 AM	pockets of peat, scattered, regardless of how small the area. A more detailed and practical definition of peat is needed than the one currently included in the RSPO Best Management Practices Guidelines for Oil Palm Planted on peat. Eg. it should provide guidance on what tests should be used in the lab to confirm that the soil meets the definition of peat (65% organic matter content). For example, is the loss of ignition test alone sufficient? Does it need to meet both a carbon content threshold and a organic matter content threshold to be categorised as peat? Many of the definition of peat also state that it is not peat unless the organic layer is 50cm, which conflicts with the requirement of no new
9	Oct 2, 2015 4:19 PM	development on peat of any depth.
10	Oct 1, 2015 6:39 AM	No comment
11	Sep 28, 2015 4:09 AM	•¶ To define peat here.
12	Sep 17, 2015 3:22 AM	Nil
13	Aug 19, 2015 2:40 PM	So glad this is a tough and quick action.
14	Aug 19, 2015 12:05 PM	no comment
15	Aug 17, 2015 11:31 AM	yes

RSPO NEXT PUBLIC COMMENT

EXISTING PLANTATIONS ON PEAT ARE MANAGED TO BMPS, PT2.1 All existing plantations on peat of any depth or extent shall adhere to the RSPO manual on best management practices for existing plantations on peat.

Answer Options	Response Count
	15

Number	Response Date	Response Text
1	Oct 8, 2015 12:07 PM	No comment
2	Oct 6, 2015 5:12 PM	No comment.
3	Oct 6, 2015 3:46 PM	Strongly endorse, the RSPO manual on peat management is an excellent standard. PT2.1:
4	Oct 6, 2015 10:43 AM	We welcome this indicator. Current wording: "Results of peat drainability assessments shall be publicly available"
5	Oct 6, 2015 9:49 AM	Suggest change wording to: "Results of peat drainability assessment is available upon request" I would suggest adding: Existing plantations on peat should be evaluated and considered for restoration and conversion back to peat forest. A certified third party should be consulted for evaluation; also to assist with
6	Oct 6, 2015 6:26 AM	planning and facilitation of conversion from palm oil planted on peat to peat forest.
7	Oct 6, 2015 12:27 AM	Companies should be encouraged to restore peat in existing plantation during replanting or abandoned peat land
8	Oct 5, 2015 3:58 PM	No Comment
9	Oct 5, 2015 8:02 AM	No comment.
10	Oct 1, 2015 6:39 AM	No comment
11	Sep 17, 2015 3:22 AM	Nil
12	Aug 19, 2015 2:40 PM	No comment.
13	Aug 19, 2015 12:05 PM	no comment
14	Aug 17, 2015 11:31 AM	yes
15	Aug 10, 2015 7:05 AM	All existing plantations on peat of any depth or extent shall evidence they are adhering to the RSPO.....

RSPO NEXT PUBLIC COMMENT

EXISTING PLANTATIONS ON PEAT ARE MANAGED TO BMPS, PT2.2 Results of peat drainability assessments shall be publicly available.

Answer Options	Response Count
	17

Number	Response Date	Response Text
1	Oct 8, 2015 12:07 PM	No comment
2	Oct 6, 2015 5:12 PM	No comment.
3	Oct 6, 2015 3:46 PM	No comments. - RSPO is to provide guideline for peat drainability assessment.
4	Oct 6, 2015 3:26 PM	- That internal assessment shall be acceptable. Comments:
5	Oct 6, 2015 2:56 PM	1) We don't agree about the result will be publish.
6	Oct 6, 2015 12:40 PM	Comments: Guidance on who can conduct the assessments. PT2.2: We welcome this indicator. However the indicator would be improved with further clarity on what a drainability assessment aims to do. Rather than a purely agronomic assessment of whether further drainage is possible it should also include an environmental assessment of whether further drainage is 'desirable' in terms of ongoing GHG emissions, impacts on adjacent peat systems, HCV impacts etc.
7	Oct 6, 2015 10:43 AM	
8	Oct 6, 2015 6:26 AM	I agree
9	Oct 5, 2015 3:58 PM	No Comment
10	Oct 5, 2015 8:02 AM	No comments.
11	Oct 5, 2015 3:11 AM	1) We don't agree about the result will be publish.
12	Oct 2, 2015 4:19 PM	Do you mean pseiometer readings?
13	Oct 1, 2015 6:39 AM	No comment Does this means that there will be no new planting at all on peat land regardless of conflicting definitions and status?
14	Sep 17, 2015 3:22 AM	Is there any guidelines for peat drainability assesments?
15	Aug 19, 2015 2:40 PM	No comment.
16	Aug 19, 2015 12:05 PM	no comment
17	Aug 17, 2015 11:31 AM	not necessary

RSPO NEXT PUBLIC COMMENT

GENERAL COMMENTS REGARDING NO PLANTING ON PEAT Please use this section to provide any comments regarding technical content, clarity of language, consistency with other RSPO requirements and any other relevant comments.

Answer Options	Response Count
	19

Number	Response Date	Response Text
1	Oct 8, 2015 12:07 PM	No comment
2	Oct 6, 2015 5:12 PM	No comment.
3	Oct 6, 2015 4:20 PM	The principles and criteria proposed here are strong, and we recommend keeping them as stated.
4	Oct 6, 2015 3:57 PM	There are numerous abbreviation in this section which need to be defined for the 'laymen'
5	Oct 6, 2015 3:46 PM	Strongly endorse, the RSPO manual on peat management is an excellent standard.
6	Oct 6, 2015 2:40 PM	Suggest removal of PT2.1 and PT2.2 - not sure this adds value. It is already required as part of P&C 2013. Peat
7	Oct 6, 2015 1:30 PM	Suggest removal of PT2.1 and PT2.2 - not sure how this adds value. Already required as part of P&C 2013.
8	Oct 6, 2015 12:01 PM	NO PLANTING ON PEAT: The principles and criteria proposed here are strong, and we recommend keeping them as stated. Proposed additional indicator PT2.3: There should be an additional indicator addressing the requirement to rehabilitate peat areas that have already been planted where the environmental impact (including GHG emissions) from continuous cultivation and drainage are deemed unacceptable: Proposed new indicator text: Where drainability assessments have identified areas unsuitable for oil palm replanting, including the likely GHG emissions associated with continued cultivation, plans shall be in place for appropriate rehabilitation or alternative use of such areas. If the assessment indicates a high risk of serious flooding and/or saltwater intrusion within two crop cycles, growers and planters shall not replant but instead shall implement rehabilitation.
9	Oct 6, 2015 10:43 AM	
10	Oct 5, 2015 3:58 PM	No Comment
11	Oct 5, 2015 8:02 AM	See above.
12	Oct 1, 2015 5:38 PM	The principles and criteria proposed here are strong, and we recommend keeping them as stated.
13	Oct 1, 2015 2:52 PM	The principles and criteria proposed here are strong, and we recommend keeping them as stated.
14	Oct 1, 2015 6:39 AM	No comment The principles and criteria proposed here are strong, and we recommend keeping them as stated.
15	Sep 24, 2015 10:02 PM	
16	Sep 24, 2015 10:07 AM	We are happy with the proposed statements.
17	Aug 19, 2015 2:40 PM	Public awareness is key and glad that this will be reported.
18	Aug 19, 2015 12:05 PM	no comment - peat draining should not be allowed
19	Aug 17, 2015 11:31 AM	a good step forward

RSPO NEXT PUBLIC COMMENT

MEASURE GHG's, GHG1.1Energy, including renewable, use per tonne of CPO, FFB or other palm product produced shall be monitored at plantation and mill levels for both current and new operations. The RSPO Palm GHG Tool or another RSPO-endorsed equivalent tool shall be used to monitor operational emissions.

Answer Options	Response Count
	14

Number	Response Date	Response Text
1	Oct 8, 2015 12:08 PM	We welcome this indicator
2	Oct 6, 2015 5:18 PM	No comment. 'The RSPO Palm GHG Tool or another RSPO-endorsed equivalent tool....',
3	Oct 6, 2015 4:00 PM	Suggested that this reads as 'The RSPO Palm GHG Tool or any other RSPO-endorsed equivalent tool.....'.
4	Oct 6, 2015 3:49 PM	This was already accepted by resolution in the RSPO AGM. Unilever strongly endorses this criterion. GHG1.1: We welcome this indicator.
5	Oct 6, 2015 10:43 AM	
6	Oct 5, 2015 8:22 PM	Not clear if this is about "energy" or about "GHG" as the title suggests.
7	Oct 5, 2015 3:59 PM	No Comment "In order to better assess the CarbonFootPrint of the 'Raw Materials Supply-Industrial Transformation Process-Product's Delivery' chain, it should be taken into account the primary energy sources (single fossil fuel, mix of
8	Oct 5, 2015 9:35 AM	fossil fuels, renewable/s) fuelling the electric energy generation scheme to whose grid the firm is connected"
9	Oct 5, 2015 8:04 AM	No comment.
10	Oct 2, 2015 4:33 PM	No Comment
11	Oct 1, 2015 6:40 AM	No comment
12	Sep 17, 2015 3:37 AM	Nil
13	Aug 19, 2015 2:42 PM	No comment.
14	Aug 17, 2015 11:37 AM	yes, so long as not over-complicated

RSPO NEXT PUBLIC COMMENT

REDUCE GHG's, GHG2.1 There shall be a roadmap/plan and targeted and *impactful reductions of GHG emissions and they shall be monitored on an ongoing basis. *Given the nature of this work and the differences that companies may have in timelines and possible results it is of particular interest to the working group to receive input on how to frame an indicator to show evidence of impact via improvement in emissions rates. We welcome your input via the Public consultation process on this question and engagement from those involved in already planning and implementing programs to those ends in this sector.

Answer Options	Response Count
	18

Number	Response Date	Response Text
1	Oct 8, 2015 12:08 PM	RSPO should have or develop guidance on impactful measures in order of priority (potential impact in terms of GHG emissions and relative cost/benefits).
2	Oct 6, 2015 5:18 PM	Does this include LUC emissions included in the deforestation category? What impact is to be measured? There is need for clarity on this. Key Performance Indicators (KPIs) are not uncommon as means to measure impact via improvement in emissions rate, and should relate the parameters being measured. Some of these have been suggested in the subsection dealing with measurement of GHGs, and it is not clear what is being sought in this section. Typical KPIs usually employed by producers are: Water use efficiency (m3/ton of product), GHG eq/per tonne of CPO, FFB... This appears to have an intent similar to the information being sought in the section on 'Report GHG'
3	Oct 6, 2015 4:00 PM	Energy conservation programmes in combination with the palm GHG tool should be sufficient to arrive at measurable emission reductions.
4	Oct 6, 2015 3:49 PM	GHG 2.1. Also the GHG-WG in RSPO confirms that there are 3 major sources from GHG emissions, - land use-change [one-off clearing] and ongoing emissions from all soils incl. peat - operations in the plantation (mainly fertilizer, but also transport etc.) - mill operations incl. treatment of mill effluents (POME) RSPO should set clear, desirable and achievable targets for each of the emission sources and also one overall target to be achieved latest by 2020. Proposed text: The company develops and implements a time-bound plan to further reduce GHG from its operations. The maximum GHG emissions per ton of CPO produced shall not exceed XXX kg CO2e per ton of CPO latest in 2020. The RSPO Palm GHG Tool or another RSPO-endorsed equivalent tool shall be used to monitor operational emissions. [remark: Currently we are not sure on the results of the GHG WG, however they may have established clear and ambitious calculation already.] Proposed text for guidance: In case the company does not yet meet the target, it can be certified if the CO2 emission levels do not exceed the maximum thresholds for at least two of the major GHG emissions sources: - Land use-change incl. one-off clearing and ongoing emissions from all soils incl. peat. Max. GHG emissions allowed: YY kg CO2e per ton of FFB - Operations in the plantation: eg. 52kg CO2e per ton of FFB - Operations in the Mill incl. mill effluents (POME): XXkg CO2e per ton of CPO
5	Oct 6, 2015 1:58 PM	[remark: Currently we are not sure on the results of the GHG WG, however they may have established clear and ambitious calculation already.]
6	Oct 6, 2015 12:02 PM	Reduce GHGs: RSPO Next eligible companies should establish and report a specific target for reducing GHGs over time, against which progress is regularly reported. GHG2.1: We welcome this indicator. However it would be greatly strengthened if there was an agreed level and timing of reductions required to be RSPO Next verified. Significant reductions should be against benchmarked current emissions from a set time period. Operations with high benchmarked emissions should deliver greater reductions. The targets need to be backed up with credible data and justified and also calculated and reported in a uniform way using the same tool - Palm GHG. There would be some merit in taking a fixed 'threshold' approach such as that already in operation via the RSPO EU-RED add-on: Use of default values specified in Annex V of EU-RED or use of actual greenhouse gas values to calculate total greenhouse gas savings according to the EU-RED methodology.
7	Oct 6, 2015 10:43 AM	35% greenhouse gas reduction criterion specified in EU-RED (and 50% greenhouse gas reduction criterion from 1 January 2017). GHG 2.1: UCS believes it is essential that companies aim for and demonstrate reductions, over time, in GHG emissions. We suggest the following language "Companies shall provide a public roadmap/plan and monitor and report against their performance, in progressively reducing GHG emissions per planted hectare and per tonne of crude palm oil and palm kernel oil produced."
8	Oct 5, 2015 11:55 PM	

9	Oct 5, 2015 8:22 PM	It would be helpful to list the GHG emissions that RSPO generally considers to be most significant to reduce negative and improve positive impact. For example: 1. land use change (one-off clearing and ongoing emissions from (peat)soil), if any; 2. mill effluent (POME), if any; 3. plantation operations (notably fertiliser use), if any; 4. other mill operations (mill energy use ao), if any. On this, essential that companies aim for and demonstrate reductions, over time, in GHG emissions. We suggest the following language "Companies shall provide a public roadmap/plan and report against their performance, in progressively reducing GHG emissions per planted hectare and per tonne of crude palm oil and palm kernel oil produced."Both absolute and relative targets must be given. RSPO could include guidance figures that reflect best practices per tonne CPO produced.
10	Oct 5, 2015 3:59 PM	No Comment
11	Oct 5, 2015 8:04 AM	No comment.
12	Oct 2, 2015 4:33 PM	I think companies should be required to report GHG emissions per planted hectare and per tonne of CPO. Both intensity measures should be used so as not to bias results against companies who are at different stages of development. I think companies should just be required to show a decreasing trend over time in their GHG emissions per planted hectare or per tonne of CPO because it is very difficult to determine realistic quantitative targets for GHG emissions reductions when there are so many variables. Furthermore, changes in the PalmGHG methodology can have quite a big impact on the total carbon footprint.
13	Oct 1, 2015 2:53 PM	RSPO Next eligible companies should establish and report a specific target for reducing GHGs over time, against which progress is regularly reported.
14	Oct 1, 2015 6:40 AM	no comment
15	Sep 24, 2015 10:09 AM	We suggest that the company's themselves establish and report their own GHG reductions targets within self-determined timelines as they are the best suited to do so. Their progress in relation to the milestones within this target will then be monitored.
16	Sep 17, 2015 3:37 AM	Nil
17	Aug 19, 2015 2:42 PM	No comment.
18	Aug 17, 2015 11:37 AM	given many may have already made notable steps (in improving efficiencies which also reduce GHG emissions) may organisations may not be able to offer notable reductions moving forward

RSPO NEXT PUBLIC COMMENT

REDUCE GHG's, GHG 2.2 Best management practices shall be implemented for the reduction of operational emissions, including but not limited to:-plans for installation of Biogas collection from POME in place at all locations by 2020 or-Other techniques with proven same results as from biogas collection and-Optimal use of inorganic fertilisers and chemical inputs to minimise emissions

Answer Options	Response Count
	17

Number	Response Date	Response Text
1	Oct 8, 2015 12:08 PM	As POME capture is a high impact measure in terms of GHG emissions reduction, this is a very welcome indicator. It is also required for RSPO-RED / compliance with the EU Renewable Energy Directive.
2	Oct 6, 2015 5:18 PM	No comment. Best management practice..... It is suggested that the list of best management practice should not be limited to those listed in the draft proposal but include e.g. improvement of operational energy efficiency etc. A comprehensive and realistic list should be referred to if available from the RSPO.
3	Oct 6, 2015 4:00 PM	An additional suggestion would be to explain (either in footnotes or otherwise how the year 2020 was decided upon. Is this cut-off date applicable to all installations (current and new) or only to existing installations?
4	Oct 6, 2015 3:49 PM	Reference could have been made here to composting of organic waste to supplement inorganic fertilizer, and best practice suggestions for POME digesters rather than just biogas collection.
5	Oct 6, 2015 3:27 PM	GHG2.2 - Suggest that growers to submit a time-bound plan for biogas trap facilities, instead of commit to a cutoff date (2020). For Malaysian context, the plans for installation of Biogas from POME by 2020 is only applicable in Malaysia and may not be applicable for the other countries. Reduce GHG (GHG 2.2) Plans for installation of biogas collection from POME in place at all locations by 2020 Comments: In the introduction it is stated that RSPO Next sets up requirements for raw material suppliers. Biogas is an expensive investment. It cannot be applied for all suppliers since not all suppliers have the same financial capacity to implement this. In addition, there will be a parameter that needs to be met that is financially viable for the biogas to be installed in the mill e.g. mill with small capacity is not viable. It is not feasible to lock time line at 2020 and requires that all locations needs to have biogas installation.
6	Oct 6, 2015 3:03 PM	Comments: more practical for individual growers to set their own target timeline than a 2020 timeline for all
7	Oct 6, 2015 12:41 PM	GHG2.2: We welcome this indicator.
8	Oct 6, 2015 10:43 AM	
9	Oct 6, 2015 6:27 AM	I agree
10	Oct 5, 2015 3:59 PM	No Comment
11	Oct 5, 2015 8:04 AM	No comment. I don't think 2020 is a realistic target for commissioning of biogas plants at all mills because this requires a large capital investment and there is quite a long lead time between obtaining the capital and commissioning the facilities.
12	Oct 2, 2015 4:33 PM	I think it would be worth adding that Methane capture facilities should be included in the blue print for all new mills built and then commissioned with 5 years of the mill being commissioned.
13	Oct 1, 2015 6:40 AM	no comment
14	Sep 28, 2015 4:10 AM	Plans for installation of Biogas collection from POME in place at all locations by 2020 - Not a good idea to fix a dictated date outside of government regulations.
15	Sep 17, 2015 3:37 AM	Nil
16	Aug 19, 2015 2:42 PM	No comment.
17	Aug 17, 2015 11:37 AM	whilst ideal this should not be mandatory, rather guidance

RSPO NEXT PUBLIC COMMENT

REPORT GHG's 3.1GHG measurement results, targets (absolute and/or intensity) and reductions shall be publicly reported [at least annually].

Answer Options	Response Count
	17

Number	Response Date	Response Text
1	Oct 8, 2015 12:08 PM	No comment
2	Oct 6, 2015 5:18 PM	As with an earlier comment, does this mean reporting to RSPO or public reporting in a company's own communications? It would be useful if this covered both; this offers an opportunity for the RSPO to assess its impact. Suggestion: perhaps it would be more efficient to ensure that this information is part of the RSPO ACOP report within a section dedicated for members who voluntarily decide to sign up to the RSPO NEXT initiative. Additionally, how shall the reductions be reported? Percentage reduction in emissions in current year in comparison to emissions of previous year? Or cumulative emission reduction from previous years to current year?
3	Oct 6, 2015 4:00 PM	Thought should be given to this issue to ensure consistency and uniformity of information reported.
4	Oct 6, 2015 3:49 PM	Unilever strongly endorses this criterion, in line with the resolution already adopted at the RSPO AGM. Comments: 1) Where the report will published? In the RSPO website or in Company website itself ?
5	Oct 6, 2015 2:56 PM	2) We propose statement "GHG measurement" change to "GHG Calculation".
6	Oct 6, 2015 12:41 PM	Comments: Suggest commencing from 1January 2017 GHG3.1: We welcome this indicator.
7	Oct 6, 2015 10:43 AM	
8	Oct 6, 2015 6:27 AM	I agree
9	Oct 5, 2015 3:59 PM	No Comment
10	Oct 5, 2015 8:04 AM	No comment. 1)Where GHG result will be publish, what is in RSPO website or the company website itself ?
11	Oct 5, 2015 3:11 AM	2)We offer "GHG measuremen" change with "GHG Calculation".
12	Oct 2, 2015 4:33 PM	I don't think it is realistic or helpful to expect companies to publish quantitative targets for GHG emissions reduction. They should just have to show a reduction in GHG emissions intensity over time.
13	Oct 1, 2015 6:40 AM	no comment
14	Sep 17, 2015 3:37 AM	Nil
15	Aug 19, 2015 2:42 PM	No comment.
16	Aug 17, 2015 11:37 AM	based on RSPO tool once available and independently validated as meaningful; part of ACOP For plantation companies on a per mill basis, or as a company ?
17	Aug 10, 2015 7:08 AM	What about for supply chain companies who adopt RSPO Next - this also applies to them for their own GHG reporting ?

RSPO NEXT PUBLIC COMMENT

GENERAL COMMENTS REGARDING GHG's Please use this section to provide any comments regarding technical content, clarity of language, consistency with other RSPO requirements and any other relevant comments.

Answer Options	Response Count
	15

Number	Response Date	Response Text
1	Oct 8, 2015 12:08 PM	GHGs is plural not possessive, therefore do not need 's (sorry!)
2	Oct 6, 2015 5:18 PM	No comment.
3	Oct 6, 2015 4:21 PM	RSPO Next eligible companies should establish and report a specific target for reducing GHGs over time, against which progress is regularly reported.
4	Oct 6, 2015 3:49 PM	No comments.
5	Oct 6, 2015 2:40 PM	Redundant to RSPO P&C 5.6.3 GHG
6	Oct 6, 2015 1:30 PM	Redundant to RSPO P&C 5.6.3
7	Oct 5, 2015 3:59 PM	No Comment
8	Oct 5, 2015 8:04 AM	No comment.
9	Oct 2, 2015 4:33 PM	No comment
10	Oct 1, 2015 5:38 PM	RSPO Next eligible companies should establish and report a specific target for reducing GHGs over time, against which progress is regularly reported.
11	Oct 1, 2015 6:40 AM	no comment Reduce GHGs: RSPO Next eligible companies should establish and report a specific target for reducing GHGs over time, against which progress is regularly reported.
12	Sep 24, 2015 10:03 PM	
13	Sep 15, 2015 11:55 AM	with just a small tweak here, this could also meet EU RED requirements?
14	Aug 19, 2015 2:42 PM	It would be great to see the timeline moved up to 2018 for the Biogas collection from POME. Careful consideration needs to be made on this so as not to put off existing or new members; GHG emissions need to be understood by the members but is hould not detract on the RSPO prime focus on preserving current forests and
15	Aug 17, 2015 11:37 AM	protecting the rights the indigenous and other peoples involved in sustainable palm production

RSPO NEXT PUBLIC COMMENT

SOCIAL IMPACT ASSESSMENTS & PLANS, HR1.1 The company shall use independent and participatory SEIA to develop plans to mitigate the negative and promote the positive indirect or secondary impacts of the plantation development. Negative indirect/secondary impacts can be (without being limited to) : food security issues for local communities (including communities not in the immediate vicinity of the project), increased land pressure on natural/protected habitats and land conflicts caused by reduced land availability.

Answer Options	Response Count
	15

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	+ migrant labour issues
2	Oct 6, 2015 5:21 PM	Could this include 'to identify and mitigate' rather than just to mitigate, to ensure a participatory approach is used for the identification of potential impacts also. To this list of negative indirect/secondary impacts should be added: poor working conditions/working conditions that do need meet international requirements such as ILO standards.
3	Oct 6, 2015 5:20 PM	Participatory SEIAs are already a requirement in the RSPO's P&Cs. Better guidance is apparently needed.
4	Oct 6, 2015 4:03 PM	Please consider inserting 'assess/evaluate and 'between'.....SEIA to' and 'develop plans.....' Social Impact Assessments and Plans (HR1.1) Negative indirect/secondary impact can be (without being limited to): food security issues for local communities (including communities not in the immediate vicinity of the project)
5	Oct 6, 2015 3:07 PM	Comments: The food security is a very broad issue. We cannot assure the food security for local communities that has no direct impact by our operations. HR 1.1. We fully support the development of such plans, however this does not clearly indicate actions which need to be taken and followed up. Therefore proposed text: "The Company shall use independent and participatory SEIA to develop plans to mitigate the negative and promote the positive indirect or
6	Oct 6, 2015 2:28 PM	secondary impacts of the plantation development. The plan outlines actions and activities to be taken by the company. The plan is reviewed and adapted on a annual basis." Regarding the use of the word "plans": New Plantings Procedure consistently refers to Monitoring and Management Plans. This is not only providing clear terminology but is also a helpful expression of the need to turn
7	Oct 5, 2015 8:22 PM	various assessments (SEIA, HCV, HCS, FPIC) into actionable plans and means to monitor that they are delivered. A lot of the human rights violations happen even after the new plantings phase.
8	Oct 5, 2015 4:05 PM	No Comment
9	Oct 5, 2015 8:20 AM	RSPO Should come with a process of recognising the independent SIA assessors similar to HCVLS.
10	Oct 2, 2015 4:38 PM	No comment To add water safety after the food security - * food security and water safety issues for local communities (etc)
11	Oct 1, 2015 6:50 AM	The acronym for Social Impact Assessments is SIA and not SEIA • The company shall use independent and participatory SEIA to develop plans to mitigate the negative and promote the positive indirect or secondary impacts of the plantation development. - When? For sure at time of new development. After that should be up to the company depending on outcome of its social impact program. • This is already part of existing RSPO P&C.
12	Sep 28, 2015 4:12 AM	The phrase "...shall use independent....SEIA..." is confusing. What is meant by independent? Will it require to be carried out by external party?
13	Sep 17, 2015 3:51 AM	Food security issues are not normally within the immediate vicinity of communities and this should not be placed under the growers' responsibility
14	Aug 19, 2015 12:08 PM	this is of utmost importance
15	Aug 17, 2015 11:47 AM	cannot comment

RSPO NEXT PUBLIC COMMENT

SOCIAL IMPACT ASSESSMENTS & PLANS, HR1.2The company shall demonstrate it has taken negative indirect secondary impacts into consideration and has, for example, refrained from developing areas that will be used by the communities for current and future subsistence and other land needs. The initial planning shall cover at least the first cycle of the oil palm development. Further consultations with affected stakeholders and identified relevant third parties shall be carried out to review the plans, before and throughout development phases. Planned land allocation to various activities shall be shared during such consultations.

Answer Options	Response Count
----------------	----------------

	14
--	----

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	We welcome this indicator
2	Oct 6, 2015 5:21 PM	No comment. Do 'stakeholders' include 'rights-holders' in this context?
3	Oct 6, 2015 5:20 PM	Is developing community land that was intended for subsistence the best example of secondary impacts? HR.1.2 This indicator is too vague. It can provide much clearer language and topics such as "empowerment of women", "avoid human rights violations", "assure food security for local communities", "avoiding any negative impact on household incomes of surrounding communities", "assure food and cash crop production of communities" etc. Much better guidance is needed to make this indicator meaningful.
4	Oct 6, 2015 2:28 PM	Comments: (1)Should this read as indirect or secondary instead of indirect secondary. (2) this is impossible to quantify future needs
5	Oct 6, 2015 12:44 PM	Indicator stated: Company to have further consultations with affected stakeholders and identified relevant third parties shall be carried out to review the plans, before and throughout development phases.
6	Oct 6, 2015 9:51 AM	It should be clear that the consultations throughout development phases is only applicable for the undeveloped area. This indicator is unnecessarily vague ("taken into consideration"; "for example"), while in comparison POIG indicator 2.4 provides much clearer language ("avoidance of potential human rights violations"; "empowerment of women" ao). The requirement should define the need for an integral land use planning approach and a social management and monitoring plan. Both the planning as well as the plan should take a gender-sensitive approach, considering the different roles that men and women have in relation to e.g. landownership, use, food crop or cash crop production, markets and credit.
7	Oct 5, 2015 8:22 PM	No Comment
8	Oct 5, 2015 4:05 PM	No comment.
9	Oct 5, 2015 8:20 AM	No comment
10	Oct 2, 2015 4:38 PM	No comment
11	Oct 1, 2015 6:50 AM	No comment
12	Sep 28, 2015 4:12 AM	• How would the future needs 10 to 20 years out be determined today beyond FPIC? Whose responsibility is it to identify "relevant" third party?
13	Sep 17, 2015 3:51 AM	To include "after consultation with local authority" after the phrase "relevant third party"
14	Aug 17, 2015 11:47 AM	cannot comment

RSPO NEXT PUBLIC COMMENT

SOCIAL IMPACT ASSESSMENTS & PLANS, HR1.3The company shall respect the decision by some communities to refuse, before it is started, the planned development. Recognising that social values are dynamic, and that communities are free to make their own choices, the company shall ensure that the process of consultation and of planning is adaptive and allows for yearly (or more frequent, as needed) consultations during the development of the project.

Answer Options	Response Count
	14

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	We welcome this indicator
2	Oct 6, 2015 5:21 PM	No comment. Can criterion be clearer about what is different from RSPO P&Cs, which already contain a commitment to Free, Prior and Informed Consent?
3	Oct 6, 2015 5:20 PM	Criterion needs to be clear that any decision has been made by the community as a whole. Not sure what is meant by 'recognising that social values are dynamic'.
4	Oct 6, 2015 3:29 PM	HR1.3 - Yearly consultation can only apply to those potential land where land/ crop compensation is yet to be concluded. Social Impact Assessments and Plans (HR1.3) The company shall respect the decision by some communities to refuse, before it is started, the planned development. Comments : Some communities cannot influence the majority decision of communities without equipped by strong evidence and reasons. Suggestion: The company shall respect the decision by some communities, supported by valid evidence and majority of the other communities, before it is started, the planned development. Comments: this is not practical - a company may have compensated for the land and not necessarily planted it within a year
5	Oct 6, 2015 3:07 PM	
6	Oct 6, 2015 12:44 PM	After consent has been given for development and development have begun, what type of yearly consultation is expected to take place?
7	Oct 5, 2015 4:05 PM	No Comment
8	Oct 5, 2015 8:20 AM	No comment.
9	Oct 2, 2015 4:38 PM	No comment
10	Oct 1, 2015 6:50 AM	The first sentence is not clear. Needs to be reworded. Is it trying to say: The company shall respect the decision by some communities to refuse the planned development? • Are there any guidelines as to what constitutes as a refusal? What if 8 out of 10 people in a community are FOR a planned development?
11	Sep 28, 2015 4:12 AM	• This is what FPIC is about. Social also included in HCV and in HCS process. Not practical to layer over another broad statement.
12	Sep 17, 2015 3:51 AM	Definition of the word "some" in the sentence ".....decision by some communities....."
13	Aug 19, 2015 12:08 PM	agreed
14	Aug 17, 2015 11:47 AM	cannot comment

RSPO NEXT PUBLIC COMMENT

SOCIAL IMPACT ASSESSMENTS & PLANS, HR1.4 Positive social impacts of plantation development shall be actively promoted, including but not limited to: Where candidates for employment are of equal merit, preference shall be given to hiring from local communities. Understanding and supporting existing alternative livelihoods and ensuring they are not threatened or reduced Provision of health and educational facilities where these are lacking or not available within accessible distance.

Answer Options	Response Count
	17

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	No comment
2	Oct 6, 2015 5:21 PM	No comment.
3	Oct 6, 2015 5:20 PM	No comments. HR1.4
4	Oct 6, 2015 4:03 PM	It appears that the content of this section relates more to employment hiring policies or a section under a company policy dealing with antidiscrimination, and not to promotional activities as suggested by the sentence 'positive social impacts'. It is suggested that the intent of this section is clarified. Social Impact Assessments and Plans (HR1.4) Where candidates for employment are of equal merit, preference shall be given to hiring from local communities
5	Oct 6, 2015 3:07 PM	Comments: The word "preference" may implicitly perceived as discrimination. HR 1.4.
6	Oct 6, 2015 2:28 PM	See below at HR 2.1. - many comments can be transferred from smallholders to communities. Comments: suggest to define what is 'accessible distance'. It could be inaccessible due to physical
7	Oct 6, 2015 12:44 PM	conditions of landscape or simply inaccessible due to sheer distance, or both. The most significant potentially positive impact of palm oil plantations may be in the relations that growers and mills have with supplying smallholder families and their wider host communities, resulting in improved benefits for both company and communities. In addition to requirements on Freedom of choice, accountability and respect for rights, Oxfam's FAIR principles provide the following guidance: Improvement of benefits: 7. Companies and communities pursue shared value creation, enabling smallholders - both men and women - to earn a decent living and to invest in the improvement and continuity of their farms. 8. Companies and communities collaborate to close yield gaps by increased resource use efficiency (water, nutrients, chemicals and energy) and low external input technologies. 9. Companies and communities improve resilience to shocks linked to prices, pests and climate. 10. Companies and communities apply climate-friendly practices and protect biodiversity. 11. Companies and communities invest in community infrastructure (e.g. health, education, water and roads).
8	Oct 5, 2015 8:22 PM	
9	Oct 5, 2015 4:05 PM	No Comment
10	Oct 5, 2015 8:20 AM	No comment.
11	Oct 2, 2015 4:38 PM	No comment
12	Oct 1, 2015 6:50 AM	What about also creating alternative livelihoods? (under 2nd bullet point) • No such thing as "equal merit" or method to prove it. Companies are free to choose the best people they think fits the role. The indicators should be that there is documented evidence that there is active recruitment in the local communities and no discrimination.
13	Sep 28, 2015 4:12 AM	• Provision of health and educational facilities where these are lacking or not available within accessible distance. - Should not be in the indicator. It is not up to the company to build up civil or what would otherwise be government infrastructure. For employees yes, for the communities at large, should not be required.
14	Sep 17, 2015 3:51 AM	Nil
15	Aug 19, 2015 9:49 PM	I would revise this sentence to reflect one minor addition: Understanding and supporting existing alternative livelihoods and ensuring they are not threatened, harmed or reduced.
16	Aug 19, 2015 12:08 PM	How will this be monitored?
17	Aug 17, 2015 11:47 AM	cannot comment

RSPO NEXT PUBLIC COMMENT

FAIR TREATMENT OF SMALLHOLDERS, HR2.1 Growers and millers shall have and implement a plan to ensure that the smallholder supply base meets RSPO requirements. Plans shall consider: Technical, financial and training support for practices relevant to all other P&Cs, particularly: soil management practices, chemical and fertiliser use and storage, use of seedlings, the identification, management and monitoring of HCV, HCS and peatland, the reduction of emissions, the resolution of land conflict, the promotion of staff/workers welfare and sustainable development.

Answer Options	Response Count
	17

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	+ the empowerment of women and their role in good management
2	Oct 6, 2015 5:21 PM	No comment.
3	Oct 6, 2015 5:20 PM	Unilever strongly supports this criterion. It is suggested that the type(s) of emissions being referred to be clearly stated.
4	Oct 6, 2015 4:03 PM	Also, there are a number of formatting issues in this section that need to be addressed. - Other stakeholders (traders, retailers, financial institutions) shall also implement the plans in ensuring smallholders to meet RSPO requirements through technical, financial and training support for practices relevant to all other P&Cs.
5	Oct 6, 2015 3:29 PM	- For growers and millers, the responsibility shall only be relevant to scheme smallholder. Fair Treatment of Smallholders (HR2.1) Plans shall consider technical, financial and training support ... Comments: Financial support shall not be given freely to create the sense of belonging. It is very common if you provide free financial support freely, the result will not be productive for both parties.
6	Oct 6, 2015 3:07 PM	It is also suggested that all the support should be given only to plasma smallholders or independent smallholders who want to engage with the company. HR 2.1. The title "fair treatment of smallholders" is not consistent with the content of the text. Therefore the title "fair treatment of smallholders" shall remain and proposed text to be added: "The Company shall demonstrate and document efforts of collaboration with all smallholders - irrespective of type and size - in the supply-base. They aim for fair treatment of smallholders in order that those smallholders become fair business partners. They develop a joint plan to further improve cooperation between mill and smallholders". Proposed text for guidance: This can be jointly done with the planning in NDF 3.2. It is also understood that such cooperation plans might not be possible at an early time in the process.
7	Oct 6, 2015 2:28 PM	However, the company documents and lines out all efforts it has taken to start collaborations with smallholders in the supply-base (eg. invitation and documentation of meetings with all smallholders in the supply base)". Collaboration of Mills and smallholders can include - but not limited to -: technical, financial and training support for all agricultural practices (particularly soil management practices), quality based price premiums for FFB with higher OER, chemical and fertilizer use and storage, provision of chemicals and fertilizers on a cost basis, soil and leaf analysis of smallholder farms, provision and use of high-quality seedlings, the identification, management and monitoring of HCV, HCS and Peatland, the reduction of emissions, the resolution of land conflict, the promotion of staff/workers welfare etc. 'Growers and millers shall have and implement a plan to ensure that the smallholder supply base -including independent smallholders- meets RSPO requirements'. Solidaridad welcomes the initiative within RSPO Next to require companies to ensure their SH supply base meets the RSPO standards. Question: Does this clause concern the full smallholder supply base, including independent SH? Recommendation: if this is the case, clarify the text by inserting the words including 'independent smallholders'. - Question: How is the plan for implementation evaluated; Eg: Is it allowed to have a plan and have a very slow pace of implementation? Recommendation: Make the link with the time bound requirements under 3.1 and 3.2 and ensure there is a timelines are consistent. Alternatively, only allow certification if entire supply base complies with requirements. - Plans shall consider technical, financial and training support for practices relevant to all other P & Cs particularly soil management practices, chemical and fertilizer use and storage, use of seedlings the identification, management and monitoring of HCVs, HCS and peatlands, the reduction of emissions, the resolution of land conflict, the promotion of staff/workers welfare and sustainable development. - Recommendation to replace by: o A smallholder support programme shall be documented and monitored, which includes: o Support shall be provided with management and monitoring of HCVs, HCS and peatlands, o Progress in implementation of the smallholder support programme shall be included in o Report on percentage of schemed smallholders, percentage of independent smallholders a) Measures to increase the productivity of smallholders to a comparable benchmark of productivity for the region, and a target of reaching the same productivity level as company estates; b) Support relating to financial management and budgeting and c) Support relating to logistics, FFB processing and improved market access. Support shall be provided with management and monitoring of HCVs, HCS and peatlands, the reduction of emissions, the resolution of land conflict, endurance of legal land titles' and relocation programs for smallholders who are on land that cannot be legally occupied for oil palm production and other measures needed to comply with the requirements.
8	Oct 6, 2015 1:01 PM	Progress in implementation of the smallholder support programme shall be included in public reporting. Report on percentage of schemed smallholders, percentage of independent smallholders and percentage that have reached level of RSPO certification of each.

9	Oct 6, 2015 12:44 PM	Comments: should exclude independent smallholders The requirement (plans to ensure smallholders meet RSPO requirements) is not in line with the title "Fair treatment of smallholders". Both Oxfam's FAIR principles (about freedom of choice and mutual accountability ao) and POIG's 2.6.1 (about smallholder support programmes and a mandatory group certification programme for independent smallholder supply bases) provide more comprehensive suggestions. Including: 3. Companies and communities pursue long-term partnerships based upon symmetrical power relationships and a healthy interdependency (including the promotion of community and smallholder organizations). 4. Companies and communities ensure internal alignment on the intent of the partnership and respect the commitments they have made. 5. Companies and smallholders enter into fair and transparent agreements and respect defined conditions on pricing, quality norms, delivery, payments and loan reimbursement.
10	Oct 5, 2015 8:22 PM	
11	Oct 5, 2015 4:05 PM	No Comment
12	Oct 5, 2015 8:20 AM	Smallholder supply base: it will be useful to clarify whether independent smallholder, associated or scheme as this involve financila support from growers and millers.
13	Oct 2, 2015 4:38 PM	No comment
14	Oct 1, 2015 6:50 AM	no comment
15	Sep 17, 2015 3:51 AM	Nil
16	Aug 19, 2015 12:08 PM	no comment
17	Aug 17, 2015 11:47 AM	very important

RSPO NEXT PUBLIC COMMENT

PREVENTING CONFLICT & RESPONDING TO COMPLAINTS, HR3.1 Communication and consultation procedures, including FPIC and dispute resolution mechanisms for individual cases, shall be established in consensual agreement with affected stakeholders, local communities and/or interested parties, with particular assurance that vulnerable, minority and gender groups shall be consulted.

Answer Options	Response Count
	11

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	+ migrant workers / communities
2	Oct 6, 2015 5:21 PM	No comment.
3	Oct 6, 2015 5:20 PM	Needs more on what these procedures should like i.e. aligning with the UN Guiding Principles on Business and Human Rights.
4	Oct 6, 2015 4:03 PM	'.....affected stakeholders, local communities and/or interested parties, with particular assurance'. Please consider deleting 'local communities and/or interested parties..' as this is already covered by stakeholders.
5	Oct 5, 2015 4:05 PM	No Comment
6	Oct 5, 2015 8:20 AM	No comment.
7	Oct 2, 2015 4:38 PM	No comment
8	Oct 1, 2015 6:50 AM	no comment
9	Sep 17, 2015 3:51 AM	Nil
10	Aug 19, 2015 12:08 PM	no comment
11	Aug 17, 2015 11:47 AM	cannot comment

RSPO NEXT PUBLIC COMMENT

PREVENTING CONFLICT & RESPONDING TO COMPLAINTS, HR3.1 Communication and consultation procedures, including FPIC and dispute resolution mechanisms for individual cases, shall be established in consensual agreement with affected stakeholders, local communities and/or interested parties, with particular assurance that vulnerable, minority and gender groups shall be consulted.

Answer Options	Response Count
	9

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	no comment
2	Oct 6, 2015 5:21 PM	No comment.
3	Oct 6, 2015 5:20 PM	See answer to 6, above.
4	Oct 5, 2015 4:05 PM	No Comment
5	Oct 5, 2015 8:20 AM	No comment.
6	Oct 2, 2015 4:38 PM	No comment
7	Oct 1, 2015 6:50 AM	This is a repeat of number 6
8	Sep 17, 2015 3:51 AM	Nil
9	Aug 19, 2015 12:08 PM	no comment

RSPO NEXT PUBLIC COMMENT

RIGHT TO USE LAND IS FREE OF CONFLICT, HR4.1 Growers and millers shall adhere to the RSPO approved FPIC guidance. Company policy shall prohibit intimidation and harassment.

Answer Options	Response Count
	10

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	Welcome this indicator
2	Oct 6, 2015 5:21 PM	No comment.
3	Oct 6, 2015 5:20 PM	No comments.
4	Oct 5, 2015 4:05 PM	No Comment
5	Oct 5, 2015 8:20 AM	No comment.
6	Oct 2, 2015 4:38 PM	No comment
7	Oct 1, 2015 6:50 AM	no comment
8	Sep 17, 2015 3:51 AM	Nil
9	Aug 19, 2015 12:08 PM	monitoring guidelines should be put in place
10	Aug 17, 2015 11:47 AM	very important

RSPO NEXT PUBLIC COMMENT

RIGHT TO USE LAND IS FREE OF CONFLICT, HR4.2 Companies shall respect land rights and FPIC even if the State fails in its duty to protect land rights, notably by invoking the national interest (also known as 'eminent domain')

Answer Options	Response Count
	14

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	Welcome this indicator
2	Oct 6, 2015 5:21 PM	No comment.
3	Oct 6, 2015 5:20 PM	More guidance is needed about how a company can respect land rights if state authorities invoke the national interest.
4	Oct 6, 2015 3:29 PM	Can a company be expected to overrule/ challenge the sovereign rights of a country? Right to use land is free of conflict (HR4.2) Companies shall respect land rights and FPIC even if the state fails in its duty to protect land rights, notably by invoking the national interest (also known as 'eminent domain'). Comments:
5	Oct 6, 2015 3:07 PM	We cannot intervene with the state decision. All parties should acknowledge and respect the state authority. It is very difficult for company to oppose government decision.
6	Oct 6, 2015 12:44 PM	Comments: More elaboration, examples and guidance is needed on the above.
7	Oct 5, 2015 4:05 PM	No Comment
8	Oct 5, 2015 8:20 AM	No comment.
9	Oct 2, 2015 4:38 PM	No comment
10	Oct 1, 2015 6:50 AM	This is very important and should be retained. • Companies shall respect land rights and FPIC even if the State fails in its duty to protect land rights, notably by invoking the national interest (also known as 'eminent domain') - Is this suggesting plantation operations disregard regulations related to land - RSPO already has FPIC well define. • Plantation operations shall cease on land planted beyond the legally determined area and there shall be specific plans in place to address such issues for the full supply base - There are a host of issues related to legality (especially in Indonesia). This statement should allow continued operations on which there is a remedial plan in place and in cooperation/knowledge/involvement of relevant government agencies
11	Sep 28, 2015 4:12 AM	
12	Sep 17, 2015 3:51 AM	Nil
13	Aug 19, 2015 12:08 PM	no comment
14	Aug 17, 2015 11:47 AM	very important

RSPO NEXT PUBLIC COMMENT

RIGHT TO USE LAND IS FREE OF CONFLICT, HR4.3Where there is conflict over land use the grower shall, through their mechanism to resolve conflicts, show evidence that the necessary action to resolve the conflict with relevant parties has been or is being taken. Where operations overlap with other rights holders the company shall resolve the issue with the appropriate authority consistent with RSPO P&C Criteria 6.3 and 6.4. Contradictions and inconsistencies between legal requirement and RSPO FPIC requirements shall be identified and solutions suggested.

Answer Options	Response Count
	14

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	No comment
2	Oct 6, 2015 5:21 PM	No comment.
3	Oct 6, 2015 5:20 PM	Unilever strongly endorses this criterion. Comments: Does the above imply that the local authorities have the final say in determining land rights
4	Oct 6, 2015 12:44 PM	of the communities in cases of conflicts? Indicator stated: "Where operations overlap with other rights holders the company shall resolve the issue with the appropriate authority consistent with RSPO P&C Criteria 6.3 and 6.4. Contradictions and inconsistencies between legal requirement and RSPO FPIC requirement shall be identified and solutions suggested".
5	Oct 6, 2015 9:51 AM	It should be made clear that legal requirement should prevail in such situation. Bearing in mind companies are expected to adhere to the laws of the country. This is provided for in Principle 2 of the RSPO P&C.
6	Oct 5, 2015 8:22 PM	It seems this requirement covers 4 indicators instead of 3. Please correct numbering.
7	Oct 5, 2015 4:05 PM	No Comment
8	Oct 5, 2015 8:20 AM	No comment.
9	Oct 2, 2015 4:38 PM	No comment
10	Oct 1, 2015 6:50 AM	no comment
11	Sep 28, 2015 4:12 AM	Should provide an option to go through local process alternatively - a community may not want to use the company grievance procedure
12	Sep 17, 2015 3:51 AM	Nil
13	Aug 19, 2015 12:08 PM	no comment
14	Aug 17, 2015 11:47 AM	yes

RSPO NEXT PUBLIC COMMENT

DECENT LABOR, HR5.1The company shall document a process of negotiation with the workforce or duly selected representatives of the workforce to establish and implement a mutually agreed upon total compensation package that represents a 'decent living wage' with a minimum of at least the legal minimum wage (regardless of hourly or piece rate payments).

Answer Options	Response Count
	12

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	Welcome this indicator
2	Oct 6, 2015 5:21 PM	No comment.
3	Oct 6, 2015 5:20 PM	Compensation package should represent the minimum wage or the prevailing industry standard, whichever is higher.
4	Oct 6, 2015 4:03 PM	'.....total compensation package that represents a 'decent living wage' with a minimum of at least the legal minimum wage (regardless of hourly or piece rate payments)'. There is repetition here which makes the intent of the text unclear. Please consider revising. Decent Labour (HR5.1) The company shall document ... of the workforce to establish and implement a mutually agreed upon total compensation package that represents a 'decent living wage' with a minimum of at least the legal minimum wage (regardless of hourly or piece rate payments). Comments: This cannot be applied for temporary labor / hourly payment labor (e.g. BHL) as they're not working full time.
5	Oct 6, 2015 3:07 PM	No Comment
6	Oct 5, 2015 4:05 PM	No comment
7	Oct 2, 2015 4:38 PM	no comment
8	Oct 1, 2015 6:50 AM	no comment • Title lacks criteria on trafficked labor. • What is definition of this? Many companies provide housing, medical, education, worship and recreational facilities on top of minimum wage.
9	Sep 28, 2015 4:12 AM	
10	Sep 17, 2015 3:51 AM	Nil
11	Aug 19, 2015 12:08 PM	no comment
12	Aug 17, 2015 11:47 AM	cannot comment

RSPO NEXT PUBLIC COMMENT

DECENT LABOR, HR5.2 There shall be no evidence of employees, including migrant, transmigrant workers and/or contracted workers being prevented from forming or joining associations and/or participating in collective bargaining, within the limits of national legislation.

Answer Options	Response Count
	10

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	Welcome this indicator
2	Oct 6, 2015 5:21 PM	No comment.
3	Oct 6, 2015 5:20 PM	Why is this criterion framed in the negative? Why not "are able to form/join"? "No evidence of" sounds a bit strange.
4	Oct 5, 2015 4:05 PM	No Comment
5	Oct 5, 2015 8:20 AM	No comment.
6	Oct 2, 2015 4:38 PM	No comment
7	Oct 1, 2015 6:50 AM	no comment
8	Sep 17, 2015 3:51 AM	Null
9	Aug 19, 2015 12:08 PM	no comment
10	Aug 17, 2015 11:47 AM	The RSPO should look at the ETI base code for guidance on wording

RSPO NEXT PUBLIC COMMENT

DECENT LABOR, HR5.3 There shall be evidence that workers and employers understand workers rights to collective bargaining and freedom of association.

Answer Options	Response Count
	9

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	Welcome this indicator
2	Oct 6, 2015 5:21 PM	No comment.
3	Oct 6, 2015 5:20 PM	What kind of evidence would be required to meet this criterion?
4	Oct 5, 2015 4:05 PM	No Comment
5	Oct 5, 2015 8:20 AM	No comment.
6	Oct 2, 2015 4:38 PM	No comment
7	Oct 1, 2015 6:50 AM	no comment
8	Sep 17, 2015 3:51 AM	Null
9	Aug 17, 2015 11:47 AM	The RSPO should look at the ETI base code for guidance on wording

RSPO NEXT PUBLIC COMMENT

DECENT LABOR, HR5.4 No hazardous work (as defined by the ILO) shall be carried out by anyone under the age of 18.

Answer Options	Response Count
	11

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	Welcome this indicator
2	Oct 6, 2015 5:21 PM	No comment.
3	Oct 6, 2015 5:20 PM	No comments.
4	Oct 5, 2015 4:05 PM	No Comment
5	Oct 5, 2015 8:20 AM	No comment.
6	Oct 2, 2015 4:38 PM	No comment
7	Oct 1, 2015 6:50 AM	no comment
8	Sep 17, 2015 3:51 AM	To delete #14, because it reflects as though this is permissible within RSPO P&C
9	Aug 19, 2015 12:08 PM	no comment
10	Aug 17, 2015 11:47 AM	The RSPO should look at the ETI base code for guidance on wording
11	Aug 10, 2015 7:09 AM	ILO to be defined

RSPO NEXT PUBLIC COMMENT

DECENT LABOR, HR5.5 There shall be evidence of initiatives to maximise education and career opportunities for the children of plantation and mill staff, including but not limited to: Provision of educational resources (e.g. textbooks, stationery), Outreach programmes on career opportunities within and outside the plantation, and The provision of apprenticeship opportunities for school leavers

Answer Options	Response Count
	10

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	Welcome this indicator
2	Oct 6, 2015 5:21 PM	No comment.
3	Oct 6, 2015 5:20 PM	No comments.
4	Oct 5, 2015 4:05 PM	No Comment
5	Oct 5, 2015 8:20 AM	children of plantation and mill staff: Why only children of staff? Should also consider the children of other employees i.e. harvesters, general workers, drivers etc.
6	Oct 2, 2015 4:38 PM	No comment
7	Oct 1, 2015 6:50 AM	no comment
8	Sep 17, 2015 3:51 AM	Outreach programmes on career opportunities within and outside the plantation should not be put under growers' responsibility
9	Aug 19, 2015 12:08 PM	no comment
10	Aug 17, 2015 11:47 AM	The RSPO should look at the ETI base code for guidance on wording; this is important to ensure NO child labor

RSPO NEXT PUBLIC COMMENT

DECENT LABOR, HR5.6A gender committee shall be established specifically to address areas of concern to women. (Management representatives responsible for communication with the gender committee shall be female)

Answer Options	Response Count
	11

Number	Response Date	Response Text
		Welcome this indicator.
1	Oct 8, 2015 12:09 PM	
2	Oct 6, 2015 5:21 PM	No comment.
3	Oct 6, 2015 5:20 PM	No comments.
4	Oct 5, 2015 4:05 PM	No Comment
5	Oct 5, 2015 8:20 AM	No comments.
6	Oct 2, 2015 4:38 PM	No comment
7	Oct 1, 2015 6:50 AM	no comment
8	Sep 28, 2015 4:12 AM	• A gender committee only for women can be against the law in some countries as it is discriminatory if it only focuses on women. Instead, it should state a gender committee should be established to address issues of concern, including those affecting women ex-reproductive rights/health.
9	Sep 17, 2015 3:51 AM	Nil
10	Aug 19, 2015 12:08 PM	no comment
11	Aug 17, 2015 11:47 AM	a clause on discrimination would be better, for women and religious and cast differences

RSPO NEXT PUBLIC COMMENT

DECENT LABOR, HR5.7 All complaints/grievances of harassment or abuse shall be documented and responses & actions monitored. There shall be time bound targets for reducing the number of harassment or abuse cases.

Answer Options	Response Count
	12

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	No comment
2	Oct 6, 2015 5:21 PM	No comment.
3	Oct 6, 2015 5:20 PM	Not sure time-bound targets are necessarily helpful here.
4	Oct 6, 2015 12:44 PM	Comments: This should be zero cases immediately
		Indicator stated: "All complaints / grievances of harassment or abuse shall be documented and responses & actions monitored. There shall be time bound targets for reducing the number of harassment or abuse case".
5	Oct 6, 2015 9:51 AM	Propose wording: "All complaints / grievances of harassment or abuse shall be documented and responses & actions monitored. There shall be demonstrable efforts for reducing the number of harassment or abuse case".
6	Oct 5, 2015 4:05 PM	No Comment
7	Oct 5, 2015 8:20 AM	No comment.
8	Oct 2, 2015 4:38 PM	No comment
9	Oct 1, 2015 6:50 AM	no comment
10	Sep 17, 2015 3:51 AM	Nil
11	Aug 19, 2015 12:08 PM	no comment
12	Aug 17, 2015 11:47 AM	The RSPO should look at the ETI base code for guidance on wording

RSPO NEXT PUBLIC COMMENT

GENERAL COMMENTS REGARDING RESPECT FOR HUMAN RIGHTS Please use this section to provide any comments regarding technical content, clarity of language, consistency with other RSPO requirements and any other relevant comments.

Answer Options	Response Count
	16

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	Consider including an indicator for non-discrimination grounds other than gender, such as religion or caste?
2	Oct 6, 2015 5:21 PM	No comment.
3	Oct 6, 2015 5:20 PM	No comments. In general, lots of repetition with the RSPO P&C 2013
4	Oct 6, 2015 2:40 PM	· Recommend retaining indicators with significant added value, i.e. (1) Clearer requirements on food security to be drawn from [HR1.1/1.2]; (2) Smallholder compliance [HR 2.1]; New HR 1.X. As the issue of food security is persistent in palm oil landscapes we propose that the issue of food security is included into the standard. Proposed text: "The Company endorses existing national strategies with regard to food security and does not contradict them by any of its business activities." Proposed text for guidance: "Strategies such as national food security strategies, poverty reduction strategies (PRSP), national development programs are adapted towards company strategies." New HR 1.Y. In conjunction with NDF 1, the ongoing FPIC procedures etc. with regard to food security we propose to add an additional indicator to make sure that food security issues are properly addressed: Proposed text: "Before developing new land the operator has to conduct an ex-ante impact assessment on food security and the Right to Adequate Food of concerned communities on the Companies property, within its vicinity and nearby surrounding communities. The availability, access, quality and stability of food must not be negatively affected by the planned operator investments and activities."
5	Oct 6, 2015 2:28 PM	HR 5: Proposed additional text for guidance: To identify forced labor etc. it shall be clearly stated that the company does not implement recruitment fees, documents are not taken away from employers Respect for human rights: In general, lots of repetition with the RSPO P&C 2013
6	Oct 6, 2015 1:31 PM	· Recommend retaining indicators with significant added value, i.e. (1) Clearer requirements on food security {to be drawn from HR1.1/1.2}; (2) Smallholder compliance [HR 2.1]; (3) decent living wage [HR5.1]. Proposed new indicator:
7	Oct 6, 2015 10:43 AM	Growers should be required to comply with the 'Free and Fair Labor in Palm Oil Production: Principles and Implementation Guidance' https://www.humanityunited.org/wp-content/uploads/2015/03/PalmOilPrinciples_031215.pdf In the sections on Respect for Human Rights, we note that this is an area in which the RSPO Next indicators are particularly weaker than Palm Oil Innovation Group indicators. We also note that independent, third-party verification of labor-related indicators require specific protocols; In addition to ensuring that these criterion can be successfully audited by accredited RSPO Certification Bodies (CB) that will certify RSPO Next, we would encourage these criterion to articulate indicators of compliance that will give guidance to auditors, using Palm Oil Innovation Group criteria as guidance. For example, with regard to HR4.3, this indicator only mention
8	Oct 6, 2015 1:51 AM	resolving social conflict, while, in contrast, POIG indicators requires that companies offer independent consultation to communities as part of the FPIC process.
9	Oct 5, 2015 11:55 PM	In respect to human rights, RSPO NEXT should go beyond current RSPO P&C to include a ban on the use of Paraquat and other hazardous chemicals on the SAN list. In order to identify forced, bonded and trafficked labour in audits, a more effective and preventative requirement should be considered for including, in line with POIG's 2.5.8/9/10 ("no recruitment fees"; "no retention of
10	Oct 5, 2015 8:22 PM	documents"; "risk assessment in the FFB supply chain").
11	Oct 5, 2015 4:05 PM	Emphasise that their is to be NO child labour.
12	Oct 5, 2015 8:20 AM	No comment.
13	Oct 1, 2015 5:39 PM	No comment.
14	Oct 1, 2015 6:50 AM	no comment
15	Sep 24, 2015 10:10 AM	We are happy with the proposed statements.
16	Aug 19, 2015 12:08 PM	this need monitoring guidelines to ensure compliance

RSPO NEXT PUBLIC COMMENT

PROVIDE INFORMATION TO STAKEHOLDERS, TR1.1 There shall be a documented Standard Operating Procedure (SOP) for responding constructively to stakeholder requests for information, including a specific time frame to respond to enquiries

Answer Options	Response Count
	11

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	Welcome this indicator
2	Oct 6, 2015 5:27 PM	No comments.
3	Oct 6, 2015 5:23 PM	No comment.
4	Oct 6, 2015 12:45 PM	Comments: suggest to exclude commercially sensitive information, or information that is detrimentalthe company or related stakeholders.
5	Oct 6, 2015 10:47 AM	TR1.1: We welcome this indicator.
6	Oct 5, 2015 4:06 PM	No Comment
7	Oct 5, 2015 8:24 AM	No comment.
8	Oct 2, 2015 4:42 PM	No comment
9	Oct 1, 2015 7:05 AM	No comment
10	Sep 17, 2015 3:55 AM	Nil
11	Aug 17, 2015 11:47 AM	yes

RSPO NEXT PUBLIC COMMENT

CODE OF ETHICS & INTEGRITY, TR2.1The ethical code of conduct shall include as a minimum a written restatement of the company commitment to and provide detail on: A respect for the fair conduct of business; A prohibition of all forms of corruption, bribery and fraudulent use of funds and resources; A proper disclosure of information in accordance with applicable regulations and accepted industry practices.

Answer Options	Response Count
	15

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	Welcome this indicator
2	Oct 6, 2015 5:27 PM	No comments.
3	Oct 6, 2015 5:23 PM	No comment. Code of ethics and Integrity (TR2.1) A proper disclosure of information in accordance with applicable regulations and accepted industry practices.
4	Oct 6, 2015 3:11 PM	Comments: Please give clear interpretation of this, some company cannot share the confidential information that already share by other company in same industry. Not all company has the same type e.g. public company and private company. TR2.1:
5	Oct 6, 2015 10:47 AM	We welcome this indicator.
6	Oct 5, 2015 4:06 PM	No Comment
7	Oct 5, 2015 8:24 AM	No comment.
8	Oct 2, 2015 4:42 PM	No comment
9	Oct 1, 2015 7:05 AM	no comment
10	Sep 28, 2015 4:12 AM	• Follow the law and regulations
11	Sep 17, 2015 3:55 AM	• Documents are true and correct Nil The proposed indicators are very vague and have huge loopholes as many companies work through agents on regulatory issues. Suggest to include these topline principles from Transparency International Business Principles: - Existence of a risk assessment taking into account geographical location, sector and relevant legislation (including extraterritorial where relevant) and identification of vulnerable business functions. - Existence of a detailed ethical policy which covers agents and contractors, and details organisational responsibilities and consequences of breach. The policy should cover at a minimum: - Bribery - Facilitation payments - Guidance and procedure for gifts and hospitality - Disclosure of political contributions - Guidelines for charitable donations and sponsorships - Documentation of communications of policy e.g - Training or guidance documents provided within the organisation - Supplier or agent clauses in contracts
12	Sep 11, 2015 5:58 AM	- Evidence of board oversight and monitoring - e.g. board reports
13	Aug 19, 2015 9:49 PM	What specifically is the action for violation?
14	Aug 17, 2015 11:47 AM	yes
15	Aug 10, 2015 7:12 AM	Publicly available

RSPO NEXT PUBLIC COMMENT

TRACEABILITY FROM PLANTATION TO MILL, TR3.1All mills shall have in place a traceability system to identify the location of production for all FFB, including %'s from own production, associated smallholders, dealers and independent smallholders and other outgrowers.

Answer Options	Response Count
	20

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	There needs to be transparency and independent verification of the traceability systems
2	Oct 6, 2015 5:27 PM	We believe this is an important criterion to ensure no smallholders are excluded.
3	Oct 6, 2015 5:23 PM	No comment.
4	Oct 6, 2015 4:24 PM	The RSPO should audit the quality and transparency of the mechanisms for achieving traceability to the FFB.
5	Oct 6, 2015 3:30 PM	Due to the strict requirement on no deforestation i.e.no development on HCS, there are concerns on excluding/ sidelining smallholders in the supply chain.
6	Oct 6, 2015 1:04 PM	See General Comments on TR below
7	Oct 6, 2015 12:03 PM	TR3.1: The RSPO should audit the quality and transparency of the mechanisms for achieving traceability to the FFB. TR3.1:
8	Oct 6, 2015 10:47 AM	We welcome this indicator.
9	Oct 6, 2015 1:53 AM	TR3.1 We would recommend offering guidance on quality of traceability systems that would be suitable for achieving this criterion. RSPO should develop system for the Chain of Custody requirement to capture FFB flow from the mills to the end users for RSPO NEXT complied supply chain
10	Oct 6, 2015 12:29 AM	The uniquely complex supply network of independent smallholders under the traders should be considered when developing the traceability system by the mill
11	Oct 5, 2015 4:06 PM	No Comment
12	Oct 5, 2015 8:24 AM	No comment.
13	Oct 2, 2015 4:42 PM	No comment The RSPO should audit the quality and transparency of the mechanisms for achieving traceability to the FFB. We are not recommending a specific methodology, and recognize that the RSPO is working to develop a
14	Oct 1, 2015 5:39 PM	traceability methodology. However verifying the quality of member companies' proposed traceability systems should be incorporated into the RSPO Next audit.
15	Oct 1, 2015 2:54 PM	The RSPO should audit the quality and transparency of the mechanisms for achieving traceability to the FFB.
16	Oct 1, 2015 7:05 AM	no comment
17	Sep 24, 2015 10:04 PM	The RSPO should audit the quality and transparency of the mechanisms for achieving traceability to the FFB.
18	Sep 24, 2015 10:14 AM	The quality and transparency of the mechanisms should be audited.
19	Sep 17, 2015 3:55 AM	Nil
20	Aug 17, 2015 11:47 AM	yes

RSPO NEXT PUBLIC COMMENT

TRACEABILITY FROM PLANTATION TO MILL, TR3.2 Within 1 year of initial RSPO Next verification the mill will only source FFB from known and identified plantation sources

Answer Options	Response Count
	14

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	Welcome this indicator
2	Oct 6, 2015 5:27 PM	This should be rephrased to "known and identified plantation and smallholder sources".
3	Oct 6, 2015 5:23 PM	No comment. Traceability from plantation to mill (TR3.2) Within 1 year of initial RSPO Next verification the mill will only source FFB from known and identified plantation sources. Comments : We have been engaging with independent smallholders since 2006. The process of grouping the independent smallholders and breaking down the layer took us around 3 years minimum - only for the smallholders with size around 1,000 ha. It is nearly impossible to implement this within 1 year plan for all mills.
4	Oct 6, 2015 3:11 PM	Suggestion: Just require the company to provide time-bound plan for traceability to plantation
5	Oct 6, 2015 1:04 PM	See General Comments on TR below TR3.2: We welcome this indicator.
6	Oct 6, 2015 10:47 AM	TR3.2 It is not clear what would happen to member companies who could not comply with this criterion within one year of RSPO Next verification. For aspirational indicators like this, market uncertainty could be
7	Oct 6, 2015 1:53 AM	avoided by having clear protocols and consequences for RSPO Next-verified members who do not comply within one year, including mandatory public reporting and transparency of performance.
8	Oct 5, 2015 4:06 PM	No Comment
9	Oct 5, 2015 8:24 AM	...FFB from known and identified plantation sources..": IDENTIFIED PLANTATIONS - Is this means that traders and independent smallholder (i.e. 2ha) cannot sell to mills.
10	Oct 2, 2015 4:42 PM	No comment
11	Oct 1, 2015 7:05 AM	No comment
12	Sep 17, 2015 3:55 AM	This contradicts with the Indonesian regulations as millers are NOT allowed to reject FFB from smallholders
13	Aug 17, 2015 11:47 AM	yes
14	Aug 10, 2015 7:12 AM	This seems to apply just to mills. This also need to apply to all adopters, ie supply chain companies need to know where their sourced palm oil has been derived from trader - mill - FFB supplier

RSPO NEXT PUBLIC COMMENT

TRACEABILITY FROM PLANTATION TO MILL, TR3.3A Due Diligence system shall be in place within 2 years of initial RSPO Next verification to assure that all FFB entering the mill is from known and identified plantation sources which are: From land legally occupied for oil palm production; (note: due to the challenges faced by smallholders on this issue in some countries - we support development of innovative solutions and encourage inputs on this topic.) From land not cleared from HCV or potential HCV areas since November 2005 (see Criterion 7.3) Existing plantations on peatlands managed to RSPO BMP Not produced on peat of any depth or extent converted to Oil Palm since Nov 2015; Not the subject of conflict with neighbouring communities; Not produced using forced, trafficked or child labour; From land that has had no use of fire.

Answer Options	Response Count
	29

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	Welcome this indicator What about HCS? Suggest rephrasing to "from identified plantation and smallholder sources".
2	Oct 6, 2015 5:27 PM	
3	Oct 6, 2015 5:23 PM	Rather than listing these requirements, can this cover all requirements for RSPO NEXT, and specify an extended scope to cover all FFB after two years? ,A Due Diligence system...'. Please correct to 'A due diligence system...' '...in some countries - we support development of innovative solutions.'). Please change 'we' to 'the RSPO supports the ...'
4	Oct 6, 2015 4:05 PM	'From land that has had no use of fire'. Please consider rewording to 'From land that has not been forest cleared'. Suggest to remove "potential HCV areas" as it is no longer applicable and it was never defined in HCV Toolkit. - TR3.3 indicator will be challenging to non-RSPO member independent smallholders, thus can potentially exclude them in the supply chain.
5	Oct 6, 2015 3:30 PM	- **To add "land clearing". From land that has had no use of fire during the land clearing. Traceability from plantation to mill (TR3.3) A due diligence system shall be in place within 2 years... which are: - From land not cleared from HCV since November 2005 - Existing plantations on peatland managed to RSPO BMP. Independent smallholders cannot fulfill RSPO BMP without any preparation, at least 1 circle period to independent smallholders comply this point Comments: - Please provide the list of independent smallholders who understand the concept of HCV and implementing it since November 2005. Since there will be only few - and probably no one is implementing it, it will result in banning all independent smallholders from getting into the mill supply chain (social and economy impact). What should be done is that how the RSPO handles these issues that lay for independent smallholders who have cases like this. - Same comment for smallholders with BMP management on peat. - What RSPO can provide is to give the smallholders the time-bound plan & suggestion to amend this. Otherwise company cannot do this immediately as independent smallholders play a major role in the company supply chain.
6	Oct 6, 2015 3:11 PM	
7	Oct 6, 2015 2:56 PM	1) We propose obtain "From land that has had no use of fire" is after RSPO Next has approved. TR 3.3. We fully confirm this indicator. We suggest that the list of bullets is replaced by the RSPO P&C and the RSPO NEXT. Even though it is not independently verifiable, the company shall aim that all suppliers are aiming towards the achievements of
8	Oct 6, 2015 2:30 PM	RSPO. Due diligence is to be set in place.
9	Oct 6, 2015 1:04 PM	See General Comments on TR below
10	Oct 6, 2015 12:45 PM	Comments: Compliance from suppliers should not be backdated. Most, if not all, allow time for suppliers to be compliant, instead of backdating.
11	Oct 6, 2015 12:03 PM	TR3.3: The criteria for sustainable production here needs to include protections for HCS areas.

		TR3.3:
		We welcome this indicator.
12	Oct 6, 2015 10:47 AM	<p>However the requirement to demonstrate that independently sourced FFB entering mills comes from land legally occupied for oil palm production should be brought forward to year 1 rather than introduced after 2 years of RSPO Next verification. Basic due diligence must be in place from the start to assure that illegal FFB does not enter the supply chain.</p> <p>Indicator stated: " Due diligence system shall be in place within 2 years of initial RSPO Next verification to assure that all FFB entering mill is from known and identified plantation sources which are:</p> <ul style="list-style-type: none"> - from land legally occupied for oil palm production - from land not cleared from HCV or potential HCV areas since Nov 2005 (see criterion 7.3).....
13	Oct 6, 2015 9:51 AM	Propose to omit "from land not cleared from HCV or potential HCV areas since Nov 2005 (see criterion 7.3)" considering it is technically very challenging to do especially when the plantation is spot patches of land.
14	Oct 6, 2015 6:35 AM	Moreover, HCV assessment toolkit for smallholder is not available.
15	Oct 6, 2015 1:53 AM	<p>I agree</p> <p>TR3.3 Given the uncertainty of the first two traceability components, clarifying the due diligence system would help increase trust in RSPO Next.</p> <p>TR 3.3: More detail should be provided on what elements are required of a "due diligence system" to assure that all FFBs entering the mill are from known sources that meet 'no deforestation, no fire, no planting on peat, reduction of GHG, respect for human rights, and transparency' guidelines. This traceability information should be transparent and available to interested parties.</p>
		A bullet needs to be added to incorporate protections for HCS forests similar to the bullet on peat conversion, ie
16	Oct 5, 2015 11:55 PM	<ul style="list-style-type: none"> ● Not converted from High Carbon Stock forests to Oil Palm since Nov 2015 <p>In addition to or instead of asking for "innovative solutions" for dealing with illegality in FFB supply chains, an approach is needed that more specifically includes risk assessment and pro-active programmes to bring FFB supply chains into legal and RSPO compliance in an inclusive way, i.e. taking the exclusion of smallholders only as an exceptional and last resort. Instead of "cut and run" an approach of "engage and support" must be promoted.</p>
17	Oct 5, 2015 8:24 PM	A HCS requirement must be added to the bulleted list.
18	Oct 5, 2015 4:06 PM	No Comment
19	Oct 5, 2015 8:24 AM	No comment.
20	Oct 5, 2015 3:12 AM	We offer obtain about "From land that has had no use of fire" is after RSPO Next approved.
21	Oct 1, 2015 5:39 PM	The criteria for sustainable production here needs to include protections for HCS areas
22	Oct 1, 2015 2:54 PM	The criteria for sustainable production here needs to include protections for HCS areas.
23	Oct 1, 2015 7:05 AM	<p>For the item on land legally occupied -- it may cause smallholders and small time farmers to lose out as stated especially in places like Sabah where jurisdictional level certification is on the cards. No suggestions at this point, but in the absence of input, suggestion is to at least indicate in brackets that cases will need to be looked at individually where smallholders are concerned.</p> <ul style="list-style-type: none"> • From land legally occupied for oil palm production; (note: due to the challenges faced by smallholders on this issue in some countries - we support development of innovative solutions.) - Ok from commercial operation but not ok for smallholders. This implies that if a smallholder brings in crop that the company has to qualify the said smallholder on the points made. • Suggest giving a sub-set of key/essential requirements for smallholders. Companies won't be bothered to go thru an in-depth audit of a 2 ha smallholder that may or may not deliver to them. They will simply avoid them. • From land not cleared from HCV or potential HCV areas since November 2005 (see Criterion 7.3) - By definition if land is used for community livelihood it is HCV thus smallholder palm is HCV. • From land that has had no use of fire. - How does one determine this many years after the fact?
24	Sep 28, 2015 4:12 AM	
25	Sep 24, 2015 10:04 PM	The criteria for sustainable production here needs to include protections for HCS areas.
26	Sep 24, 2015 10:14 AM	<p>Protection for HCS areas should also be included.</p> <p>With respect to "from land not cleared.....November 2005 (see Criterion 7.3), If the cut-off date (Nov 2005) is imposed on smallholders, most of the smallholders, especially in Indonesia would not be able to comply.</p>
27	Sep 17, 2015 3:55 AM	This will not meet the RSPO Objective for promoting sustainability.
28	Aug 17, 2015 11:47 AM	yes
29	Aug 10, 2015 7:12 AM	This seems to apply just to mills. This also need to apply to all adopters, ie supply chain companies need to know where their sources palm oil has been derived from trader - mill - FFB supplier

RSPO NEXT PUBLIC COMMENT

GENERAL COMMENTS REGARDING TRANSPARENCY Please use this section to provide any comments regarding technical content, clarity of language, consistency with other RSPO requirements and any other relevant comments.

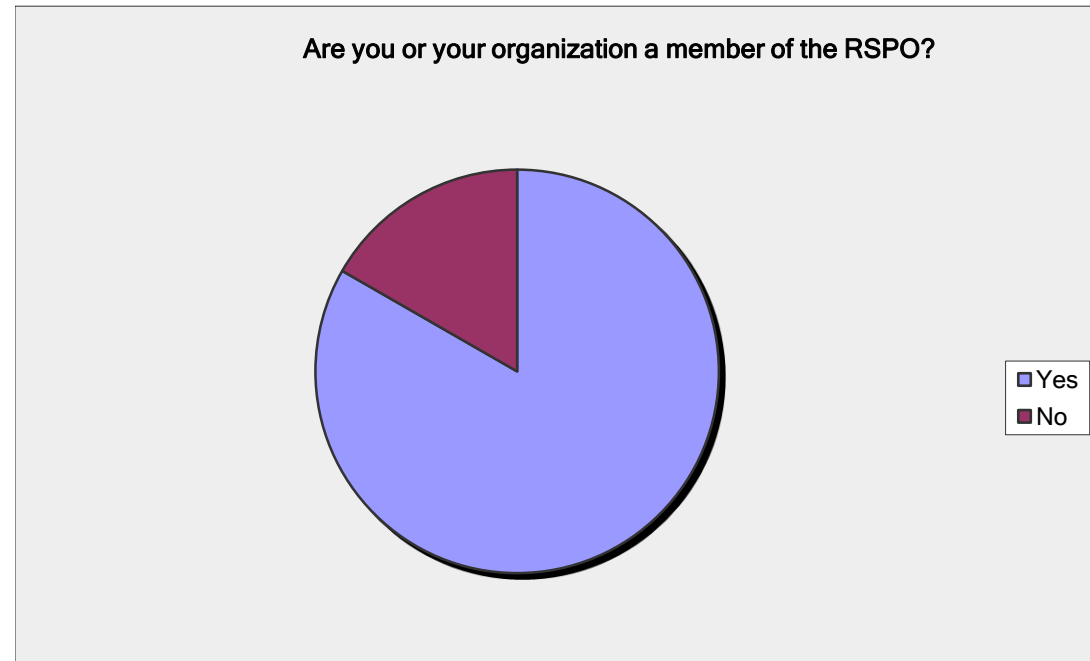
Answer Options	Response Count
	17
<i>answered question</i>	17
<i>skipped question</i>	30

Number	Response Date	Response Text
1	Oct 8, 2015 12:09 PM	No comment
2	Oct 6, 2015 5:27 PM	Provisions to promote inclusion of smallholders in the certification process should be strengthened.
3	Oct 6, 2015 5:23 PM	No comment.
4	Oct 6, 2015 4:24 PM	A claims process that includes high transparency as to progress towards a goal of 100% compliance with RSPO Next guidelines is critically necessary in order for member company claims to be credible and verifiable. We recommend that the RSPO disclose data related to RSPO Next members' progress and ongoing performance, in a manner that enables companies downstream in the supply chain and other interested stakeholders such as investors to objectively evaluate member companies' performance and progress. New TR 2.2.
5	Oct 6, 2015 2:30 PM	Proposed text: The Company proves that all enquiries will be handled according to the SOP from TR 1.1. Transparency TR3.1/3.2 is duplication of existing P&C requirement.
6	Oct 6, 2015 1:32 PM	TR3.3 provides major step forward in control of uncertified sources and is supported, but this is a significant issue and requires clear guidance from RSPO on adequacy - this cannot be left to individual growers to develop in isolation. Also this would appear to be within the ToRs of the RSPO Legality and Traceability Working Group. 'Within 1 year of initial RSPO Next verification the mill will only source FFB from known and identified plantation sources'. A due diligence system shall be in place within 2 years... ' It is expected that this requirement may require companies to stop sourcing from certain smallholders. Solidaridad would like to suggest companies to look for solutions for these smallholders to bring them into the supply base, by linking up to the requirements in 2.1. Recommendation: Solidaridad recommends to replace TR 3.1 3.2 & 3.3 with: - Within 1 year of initial RSPO Next verification the mill will have only source FFB from known and identified plantation sources' and have developed a time bound plan to ensure of this supply base with the criteria as mentioned in 2.1 - Within 2 years of initial RSPO Next verification the company will have made significant steps towards implementation of the time bound plan to ensure compliance of its full supply base with the full RSPO P& C and assure that all FFB entering the mill is o From land legally occupied for oil palm production o From land not cleared from HCV or potential HCV areas since November 2005 (see o Existing plantations on peatlands managed to RSPO BMP o Not produced on peat of any depth or extent converted to Oil Palm since Nov 2015; o Not the subject of conflict with neighboring communities; o Not produced using forced, trafficked or child labour; o From land that has had no use of fire.
7	Oct 6, 2015 1:04 PM	- Progress against the time-bound plan will be monitored and reported publicly; General Comments: A claims process that includes high transparency as to progress towards a goal of 100% compliance with RSPO Next guidelines is critically necessary in order for member company claims to be credible and verifiable. We recommend that the RSPO disclose data related to RSPO Next members' progress and ongoing performance, in a manner that enables companies downstream in the supply chain and other
8	Oct 6, 2015 12:03 PM	interested stakeholders such as investors to objectively evaluate member companies' performance and progress

		<p>Additional comments: Proposed additional indicators: No use of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat; Other issues that need to be addressed: The RSPO should consider the need to harmonise the range of cut-off dates that are emerging - HCV, peat, etc - Standard Issue Provision Cut-off date P&C HCV No loss of HCV and primary forest after Nov 2005 RSPO-EU-RED Eligibility for EU mandate No establishment after Jan 2008 RSPO-EU-RED Eligibility for EU mandate</p> <p>Not a wetland or peat area in or not drained further after Jan 2008</p> <p>Next Peat</p>
9	Oct 6, 2015 10:47 AM	<p>No new planting after Nov 2015</p> <p>Another critical issue relates to the development of the eligibility guidelines, as well as the requirements that guide who can make claims and what those claims can relay. The RSPO indicates that companies may be able to make claims about RSPO NEXT verification before securing verification for all of their global operations (ie, "central to the claims process is high transparency as to progress toward a goal of 100% compliance"). Furthermore, the current RSPO NEXT proposal would provide a one year window for sourcing from known and identified plantation sources as well as a two year window for the development of a due diligence system to ensure FFB entering the mill is from known and identified plantation sources following a list of criteria outlined in TR3.3. RSPO NEXT purportedly aims to verify that the stated components apply company-wide, including for suppliers of raw materials. Thus, in order to make public claims about RSPO NEXT verification, UCS believes a company should first be audited for full company-wide compliance to criteria, including for third-party suppliers. More clarity is required in relation to expectations of smallholders. Currently in HR 2.1 growers and millers are required to have and implement a plan to ensure that the smallholder base meets RSPO requirements. In order for companies to make claims that their global operations, including suppliers of raw material, regardless of the path of delivery of that supply, meet the RSPO NEXT criteria, smallholder suppliers would ultimately need to be verified against the same higher standards of RSPO NEXT production. Furthermore, more details are needed on the quality and transparency of the TR3.3 due diligence systems -</p>
10	Oct 5, 2015 11:55 PM	both for traceability but also for verifying that FFBS entering the mill comply with the stated indicators.
11	Oct 5, 2015 4:06 PM	No Comment
12	Oct 5, 2015 8:24 AM	No comment.
13	Oct 1, 2015 5:39 PM	<p>A claims process that includes high transparency as to progress towards a goal of 100% compliance with RSPO Next guidelines is critically necessary in order for member company claims to be credible and verifiable. We recommend that the RSPO disclose data related to RSPO Next members' progress and ongoing performance, in a manner that enables companies downstream in the supply chain and other interested stakeholders such as investors to objectively evaluate member companies' performance and progress.</p> <p>A claims process that includes high transparency as to progress towards a goal of 100% compliance with RSPO Next guidelines is critically necessary in order for member company claims to be credible and verifiable. We recommend that the RSPO disclose data related to RSPO Next members' progress and ongoing performance, in a manner that enables companies downstream in the supply chain and other interested stakeholders such as investors to objectively evaluate member companies' performance and progress.</p>
14	Oct 1, 2015 2:54 PM	such as investors to objectively evaluate member companies' performance and progress.
15	Oct 1, 2015 7:05 AM	no comment
16	Sep 24, 2015 10:04 PM	<p>A claims process that includes high transparency as to progress towards a goal of 100% compliance with RSPO Next guidelines is critically necessary in order for member company claims to be credible and verifiable. We recommend that the RSPO disclose data related to RSPO Next members' progress and ongoing performance, in a manner that enables companies downstream in the supply chain and other interested stakeholders such as investors to objectively evaluate member companies' performance and progress.</p> <p>A high level of transparency towards the progress to 100% compliance of the RSPO Next guidelines is highly critical for credibility and verifiability in the market. As such, we recommend that RSPO disclose data on the progress and performance of the RSPO Next members so as to allow companies downstream and other stakeholders (e.g. investors) can objectively evaluate the information.</p>
17	Sep 24, 2015 10:14 AM	progress and performance of the RSPO Next members so as to allow companies downstream and other stakeholders (e.g. investors) can objectively evaluate the information.

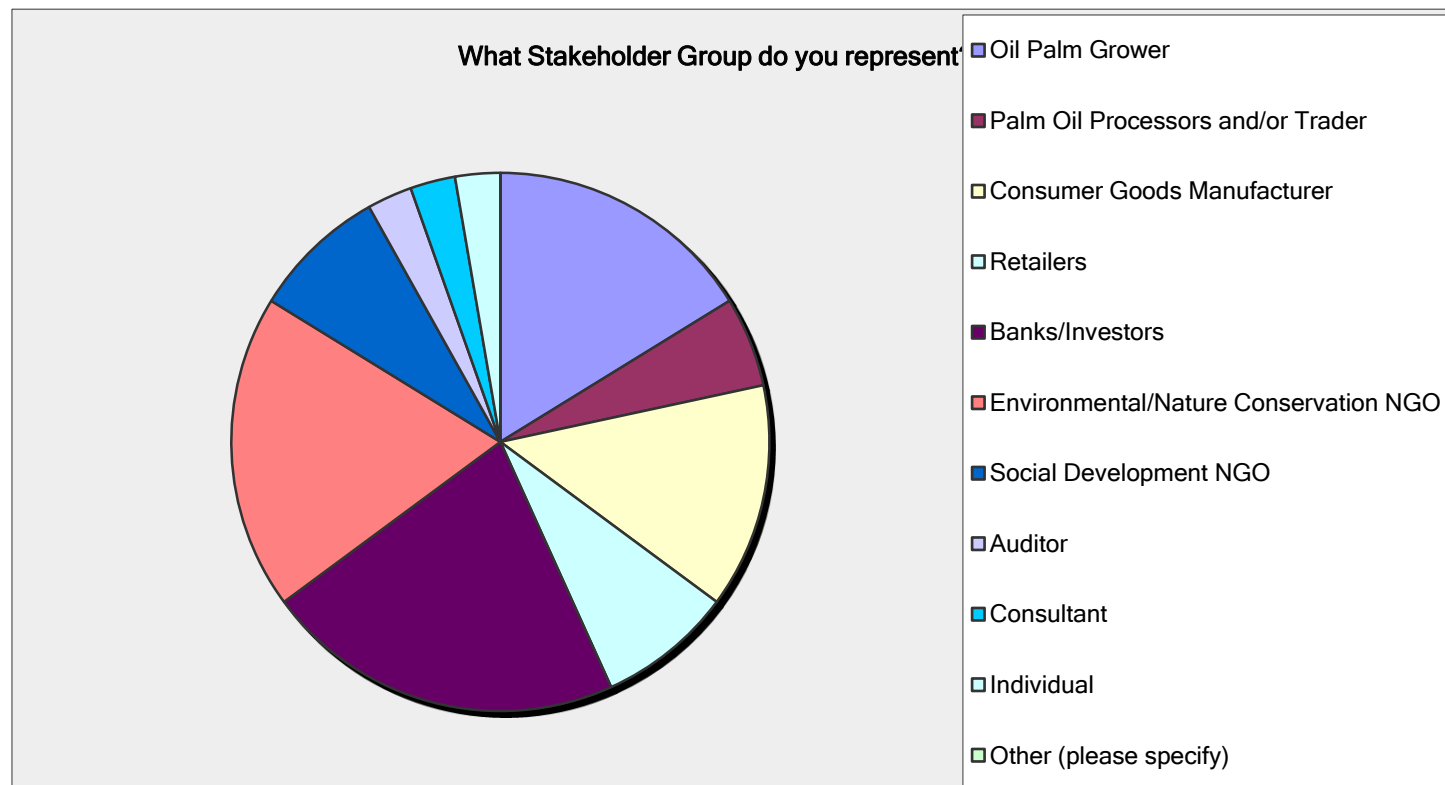
RSPO NEXT PUBLIC COMMENT

Are you or your organization a member of the RSPO?		
Answer Options	Response Percent	Response Count
Yes	83.3%	30
No	16.7%	6
<i>answered question</i>		36
<i>skipped question</i>		11



RSPO NEXT PUBLIC COMMENT

What Stakeholder Group do you represent?		
Answer Options	Response Percent	Response Count
Oil Palm Grower	16.2%	6
Palm Oil Processors and/or Trader	5.4%	2
Consumer Goods Manufacturer	13.5%	5
Retailers	8.1%	3
Banks/Investors	21.6%	8
Environmental/Nature Conservation NGO	18.9%	7
Social Development NGO	8.1%	3
Auditor	2.7%	1
Consultant	2.7%	1
Individual	2.7%	1
Other (please specify)	0.0%	0
answered question		37
skipped question		10



RSPO NEXT PUBLIC COMMENT

Please provide any additional input here.

Answer Options	Response Count
	23

Number	Response Date	Response Text
1	Oct 8, 2015 12:10 PM	We strongly welcome the development of RSPO Next and encourage the working group to ensure all indicators are as clear, strong and practical to implement as possible, which will support the credibility of RSPO
2	Oct 6, 2015 5:27 PM	<p>No comments.</p> <p>The introduction makes it clear that RSPO NEXT is a voluntary initiative. However it is unclear if this initiative is a 'voluntary verification standard' which can be considered as an 'add on' to the existing RSPO P&C as well as the SCC standard and system. It is important that this distinction is clear.</p> <p>It is acknowledged that the draft proposal is focused on strengthening the already existing RSPO standards and P&C through the introduction of additional criteria. However, the document in its current form is not very clear on what the additional criteria are, how cut-off dates (e.g. 2020 for biogas installations, etc) were arrived at. Cross referencing to/with existing RSPO and P&C documentation would also be extremely helpful in focusing on additional improvements anticipated from the RSPO NEXT.</p>
3	Oct 6, 2015 4:06 PM	<p>This review has restricted itself to addressing technical issues and concepts in the standard. However, it is noted that grammatical and formatting/editorial errors abound. Also in several sections of the document, acronyms are employed without being defined. It would be helpful for the lay reader to have these definitions either in a table or within the text.</p> <p>Dear Sir/ Mdm,</p> <p>Please find attached comments from Sime Darby on RSPO NEXT Final Draft, for your consideration Thank you.</p> <p>Regards,</p> <p>[On behalf of Sime Darby Plantation]</p> <p>Nurul Hayati Ibrahim</p> <p>RSPO & Certifications Unit PSQM Department</p> <p>Sime Darby Plantation</p> <p>T: 03-7848 4482 F: 03-7848 4363 E: nurul.hayati@simedarby.com</p>
4	Oct 6, 2015 3:37 PM	<p>"To Be A Leader in Sustainability and Safe Work Practices"</p> <p>Dear RSPO Next contact,</p> <p>Carrefour is very pleased to see that RSPO is moving forward and is working on adding new criteria to its standard. Indeed, RSPO standard enhancement is important regarding Carrefour policy and vision.</p> <p>We strongly support the RSPO next proposal and hope that it will be implemented soon.</p> <p>Bien cordialement, Best regards,</p>
5	Oct 6, 2015 3:19 PM	

Dear Sir / Madam,
Please find attached is our comments on RSPO Next
Thank you for your kind attention. Please kindly confirm if you have received this.
Many thanks
Best regards,
Asrini Subrata
Stakeholder Relations
Asian Agri
Tel: +62 21 - 230 1119
Email: Asrini_subrata@asianagri.com

6 **Oct 6, 2015 3:14 PM** Website: www.asianagri.com
Dear Sir/Madam

Herewith please find our comment to the Draft of RSPO Next as attached. Thank you
Best regards

7 **Oct 6, 2015 2:59 PM** Ismu Zulfikar

Thank you for the invitation to comment on RSPO NEXT. General Mills believes that RSPO NEXT is an important initiative. We all have a stake in seeing the RSPO strengthened as a mechanism for verifying sustainable palm oil production practices.
We believe that RSPO NEXT should serve a clear objective in providing additional and strengthened indicators to define best practice when combined with the P&C. It should create a common standard against which more ambitious pledges beyond the P&C can be measured. The addendum should incorporate the emerging definition of HCS requirement and a prohibition on new peat plantings.
RSPO NEXT should avoid duplication with the existing P&C, and should resist any unnecessary complexity. It should aim to be a relatively brief set of indicators as we believe that impact will be maximized by focusing on a few key areas.

8 **Oct 6, 2015 2:43 PM** Thank you again for the opportunity to comment. General Mills looks forward to continuing to support the RSPO as it advances the production of sustainable palm oil.

Forum Sustainable Palm Oil feedback on the Draft of RSPO NEXT
Supported by all 43 Members of the German Forum Sustainable Palm Oil. Members list at:
<http://www.forumpalmoel.org/de/mitglieder.html>

The German Forum on Sustainable Palm Oil welcomes the positive developments in RSPO to step forward by bringing up the proposal for RSPO NEXT. This proposal takes up some of our points of concerns, which we announced publicly during the extraordinary General Assembly on the occasion of the decision making on the P&C 2013. We believe that developing RSPO NEXT is an urgently required step forward to increase the credibility of the RSPO and prove that RSPO is responsive towards the criticism it faces.

The emergence of a number of Initiatives such as POIG (Palm Oil Innovations Group), SPOM (Sustainable Palm Oil Manifesto), HCS -Steering Group, IPOP (Indonesia Palmoil Pledge), TFT (The Forest Trust) as well as several others has proven that a number of major players in the Palm Oil Industry - which are mostly members of RSPO - have committed and can go beyond and implement higher standards than the RSPO currently provides. Those initiatives are often supported by "no-deforestation, no peat and no exploitation"-Commitments by a huge number of companies.

However, the majority those initiatives and commitments often lack clear definitions, clear and independent verification and it often remains unclear how all this is going to be implemented. It is unclear what needs to be changed in the field etc. Especially independent verification remains vague in many of those initiatives and there is the big risk that all those good claims and initiatives become perceived greenwash, as often no one can properly report whether they comply or not comply. We believe that RSPO NEXT should offer solutions in this regard - especially as it will be independent 3rd party verifiable - by providing well defined and clearly measurable indicators, crystal clear-guidance and clear definitions. By bringing RSPO on the NEXT level we hope that it will be feasible to align all those initiatives and reduce complexity for all stakeholders in the supply chain. However, this aligning will only be feasible if RSPO NEXT is providing a jump on the NEXT level.

General comments:

It became obvious in the last years that the focus on the certification of individual mills and their individual supply base is not sufficient to avoid negative impacts of the palm oil production. Therefore we believe that we must find solutions that RSPO NEXT

- Includes all developed plantations, as well as the not-yet developed landbanks / assets of all RSPO members
- Better recognizes that most of the problems in palm oil production don't occur on mill level, but rather in the supply-base. To set priorities right we believe that the wording should be stated as "supply-base and mills".
- Finds solutions how growers can act jointly together to interact in multi-functional landscapes they are working in. Interconnectivity of HCV set asides in plantations managed by different growers is just one example.
- Finds solutions in better interacting also with non-certified growers in the vicinity of RSPO NEXT certified plantations in order to better manage the entire landscape involving all social and environmental dimensions.
- Sets clear eligibility guidelines and criteria of companies being eligible for RSPO NEXT certification (eg. at least 70% of all plantations are already certified)
- To stop using pesticides as defined in WHO 1a and WHO 1b, as well as the Rotterdam and Stockholm Conventions, the PAN-list, paraquat and glyphosate must be included, preferably in the section of HR. We understand that as a very last resort - as formulated in POIG criteria - those pesticides would need to be used. The decision making process and identification of the use as a very last resort needs to be clearly documented.

9 Oct 6, 2015 2:36 PM

Dear Board of Governors of the Roundtable on Sustainable Palm Oil (RSPO),

PepsiCo would like to commend the Roundtable on Sustainable Palm Oil (RSPO) on the recent 'Final Draft' of RSPO Next, dated 7 August 2015 which seeks to address critical sustainability concerns in the palm oil supply chain, highlight best practices, and enhance transparency that will help ensure that palm oil is produced in a manner that upholds human rights and does not degrade the environment.

Several key aspects of RSPO Next are worth noting. RSPO Next has addressed or enhanced requirements associated with critical externalities of palm oil production including:

- No deforestation,
- No new development of peat soils,
- Monitoring and reporting on and reducing greenhouse gas emissions,
- Strengthening social impact assessments,
- Ensuring adherence to RSPO FPIC guidance, and
- Ensuring fair labor compensation and practices

In addition, RSPO Next seeks to enhance transparency by providing implementation guidance and clear performance requirements that are supported by on-the-ground verification of results.

RSPO Next represents a positive step forward, requiring 100% compliance with RSPO Principles and Criteria (P&C) and going beyond to address additional issues of concern. We encourage further development of the eligibility and implementation guidelines to enable the inclusion of small holders. We recommend that RSPO continue to develop programs that respect the limited resources of small hold farms and encourage their participation through streamlined administrative processes.

PepsiCo is committed to doing business the right way and to further realizing zero deforestation, respect for human rights, and has zero tolerance for illegal activities in our supply chain and land displacement of any legitimate land tenure holders in our company owned and operated activities and supply chain. We believe that RSPO, as an international certification scheme, is uniquely positioned to support, promote, and provide assurance that responsible and sustainable production practices are in effect across the palm oil supply chain. We are committed to sourcing 100% Physical RSPO certified palm oil by 2020.

We understand the challenges of meeting the evolving sustainability expectations of stakeholders and are very pleased to see RSPO take action, through RSPO Next, to address these issues. RSPO Next is a significant step in the right direction towards driving the impact and outcomes desired through the RSPO. PepsiCo looks forward to working with the RSPO to improve RSPO Next and to continually improving the sustainability of our supply chain.

Sincerely,
Paul Boykas

10 Oct 6, 2015 1:47 PM

11 Oct 6, 2015 1:33 PM We are happy to provide further feedback on any points.

Generic comments

Solidaridad would like to compliment RSPO on the initiative of RSPO Next. Solidaridad believes that

RSPO Next can increase transparency on the implementation of the RSPO P & C and company commitments beyond the RSPO P & C. By doing this, RSPO Next can play a significant role to transform the palm oil sector into a more sustainable one.

A general concern is: The introduction of RSPO Next, may lead European companies to immediately require compliance with RSPO Next for its palm oil sources; As RSPO Next is an initiative largely geared towards large industrial players - most of the requirements do not make sense for individual smallholders or groups of them; It should be avoided that an unintended side effect of RSPO Next is that groups of smallholders will be excluded from supplying the European market. A possible solution could be to ensure RSPO communication accompanying RSPO Next provides consistent messaging that buying Independent Smallholder certificates /credits traded via the GreenPalm /Utz platform is a viable option to promote smallholder inclusive supply chain smallholders.

12 Oct 6, 2015 1:06 PM Solidaridad would like to invite the RSPO Next development team to consider how the positive requirements regarding the fair treatment of smallholders in HR 2.1 can be linked to the requirements regarding traceability under 3.1, 3.2 and 3.3. For further suggestions see the detailed comments. IKEA has not completed the public consultation for RSPO Next as we had no specific comments to add to the criteria/indicators.

However, we want to communicate that we feel that RSPO Next is a very good step in the right direction and we are 100% supportive of the initiative.

13 Oct 6, 2015 12:10 PM When do you think the final version will be ready and implementation can begin?

Eligibility:

Only those that are substantially already P&C certified - at least 75% - since RSPO Next only really works as an add-on the P&C certification by definition if an estate is not already P&C certified it cannot yet become RSPO Next verified;

It should apply to the whole supply base - which by RSPO definition includes not only the estate that is managed but also the schemed/associated smallholders (where the land is usually managed by the company) and the 'exclusively contracted' outgrowers;

It should also at least require a 'lack of evidence' that there are major problems in the investments, joint ventures and even the independent suppliers to the member. Services such as <http://www.lexisnexis.com/en-us/products/nexis.page> could be used to see if there are issues. Even better would be for these to be required to be P&C certified.

Scope - should be everything in a wider group including their independent suppliers. To do that needs therefore:

The top asset owning company/companies of the group must be an RSPO member and the one applying for RSPO-NEXT verification. That means all the majority owned and/or managed subsidiaries in a group will be covered - but also a group can't just put forward their best estates or subsidiaries even;

The unit of verification for RSPO-NEXT is a mix of top asset owner and group and mill/supply base depending on the nature of the indicator.

All indicators in the RSPO P&Cs 2013 and RSPO-NEXT, with no exception, apply to:

All palm oil production operations worldwide majority owned and/or managed, including those of sibling or subsidiary companies;

All of the supply base of FFB entering into any mills majority owned and/or managed in compliance within the stated RSPO NEXT Timelines;

All mills or plantations that the company engages with via a joint venture or other investment, regardless of stake within the stated RSPO NEXT timelines; and

All of the supply base of FFB entering into any mill that they are in JV and/or invest in, regardless of stake, within the stated RSPO NEXT timelines

RSPO-NEXT verification requires 100% compliance for i above and reported progress and a time bound plan for 100% compliance for ii, iii and iv.

Auditing - should be done by ASI accredited CBs at the same time as P&C audits;

Claims - in principle any claims or endorsement of RSPO-Next status should be based on actual achievement of RSPO-Next status rather than the 'promise' to do so. Otherwise it is no different from the empty claims being made by some companies. Therefore public claims of RSPO-NEXT verified status can only be made when:

At a group level a minimum percentage of all palm oil production operations worldwide that are majority owned and/or managed are P&C certified and RSPO-NEXT verified.

Additionally, when there are time bound plans for 100% RSPO certification and RSPO-NEXT verifications for each of the following:

All of the supply base of FFB entering into any mills majority owned and/or managed - must be RSPO certified and RSPO-Next verified within 3 years;

All mills or plantations that the company is in joint venture in and/or that they invest in, regardless of stake - must be RSPO certified and RSPO-Next verified within 4 years; and

All of the supply base of FFB entering into any mill that they are in JV and/or invest in, regardless of stake - must be RSPO certified and RSPO-Next verified within 5 years.

Public claims must include the current % of the production in total that complies with both RSPO Certification and RSPO NEXT with inception dates and targeted completion dates.

Downstream - In order to allow users of palm oil to contribute in promoting RSPO Next a system that enables them to buy and claim that they are buying from RSPO Next companies is required. The RSPO should avoid creating new separate supply chains for RSPO Next in order to minimise confusion and delay. So 'trade' in RSPO -Next should be based on CSPO and the existing SCC systems. The RSPO should balance making this trade simple to make sure uptake is rapid but also ensure that buying CSPO from RSPO Next verified growers also represents 'best practice' for users.

The simplest model is to create a Book & Claim system for RSPO-Next

The RSPO could require brands who want to buy from RSPO-Next growers to have: A public commitment in place to no deforestation, respecting human rights, no peat, reducing GHGs

A public deadline to purchase 100% CSPO from RSPO-NEXT verified producers

Already 100% CSPO from any supply chain option - at least 50% physical CSPO - MB, SG or IP, covering all remaining palm use with Book & Claim.

Already buying a proportion of CSPO from certified smallholders.

100% of all Palm Oil use - own-brand and third party should be CSPO and should be covered by the RSPO Next commitment;

Public reporting of % of all palm products sourced that is CSPO and that is from RSPO-NEXT verified companies

14 Oct 6, 2015 10:47 AM

15 Oct 6, 2015 6:38 AM

I am glad that the RSPO is taking steps to move market transformation forward within the confines of the current system.

The Union of Concerned Scientists is providing comments on specific suggestions and alterations we propose to the draft indicators. As you are aware, there is a growing gap between the RSPO's current P&C and emerging voluntary standards for zero deforestation, zero peat conversion, and zero exploitation for palm oil production. The RSPO's release of draft RSPO NEXT indicators is a sign that you are taking consumer and marketplace concerns seriously. We appreciate the RSPO's efforts to build a system that is applicable at an organization-wide level—aiming for a company's entire operations to be held to higher standards, including suppliers of raw materials regardless of the path of delivery of that supply.

However, without addressing critical deficiencies, RSPO NEXT criteria will not be embraced by the marketplace as a viable and credible verification mechanism for the emerging best practices in palm oil production. For example, as they stand, the RSPO Next indicators still fail to meet or exceed those of another leading voluntary verification standard—POIG.

One critical issue relates to the definition of deforestation. Best practice in the industry is to use the HCS Approach to determine what forested areas deserve conservation and which lands are appropriate for development. As you are likely aware, since 2011, a variety of palm oil producers, including GAR, Wilmar, Cargill, and Musim Mas, have used the HCS Approach to determine which lands are appropriate for new plantation development. This HCS Approach also has wide support from a variety of NGOs as well as consumer goods businesses, including Avon, Danone, Colgate-Palmolive, Dunkin' Brands, Hershey Company, Mars, Nestlé, Clorox, Pepsi and Safeway. The HCS Approach is the only methodology that meets consumers' demands for a deforestation-free commitment and enjoys wide support from civil society and NGOs. Thus far, other definitions of "HCS", including that put forward by the Sustainable Palm Oil Manifesto group, fall short of what most NGOs consider to be a full zero deforestation commitment.

Another critical issue relates to the development of the eligibility guidelines, as well as the requirements that guide who can make claims and what those claims can relay. The RSPO indicates that companies may be able to make claims about RSPO NEXT verification before securing verification for all of their global operations (ie, "central to the claims process is high transparency as to progress toward a goal of 100% compliance"). Furthermore, the current RSPO NEXT proposal would provide a one year window for sourcing from known and identified plantation sources as well as a two year window for the development of a due diligence system to ensure FFB entering the mill is from known and identified plantation sources following a list of criteria outlined in TR3.3. RSPO NEXT purportedly aims to verify that the stated components apply company-wide, including for suppliers of raw materials. Thus, in order to make public claims about RSPO NEXT verification, UCS believes a company should first be audited for full company-wide compliance to criteria, including for third-party suppliers. More clarity is required in relation to expectations of smallholders. Currently in HR 2.1 growers and millers are required to have and implement a plan to ensure that the smallholder base meets RSPO requirements. In order for companies to make claims that their global operations, including suppliers of raw material, regardless of the path of delivery of that supply, meet the RSPO NEXT criteria, smallholder suppliers would ultimately need to be verified against the same higher standards of RSPO NEXT production. Furthermore, more details are needed on the quality and transparency of the TR3.3 due diligence systems - both for traceability but also for verifying that FFBs entering the mill comply with the stated indicators.

In respect to human rights, RSPO NEXT should go beyond current RSPO P&C to include a ban on the use of Paraquat and other hazardous chemicals on the SAN list.

We encourage the RSPO to integrate reporting on REPO NEXT indicators into the existing RSPO ACOP reporting progress. We also encourage the RSPO to fully define acronyms during first use throughout the indicators document.

In closing, the indicators need further clarification and strengthening in order to gain acceptance in the global marketplace as a viable solution for responsibly, sustainably produced oil that meets the emerging best practice standards

- 16 **Oct 5, 2015 11:56 PM** practice standards
- 17 **Oct 5, 2015 4:07 PM** RSPO NEXT is a good movie for the consumer and pressure groups.
- 18 **Oct 5, 2015 8:29 AM** Should consider ways to gathered comments from independent smallholders because majority of the independent smallholders have difficulties in accessing to this kind of survey. Where possible, reference could be made to smallholders as being part of this process and what RSPO Next would mean for them, and sustainability in general. Also what would RSPO Next mean for communities
- 19 **Oct 1, 2015 7:14 AM** both those within and downstream from a project site.
- 20 **Sep 28, 2015 4:26 AM** Not to be repetitive of the existing coverage of the principles and criteria. We are very happy with the continuous progress and improvement of the RSPO and its P&C's. We believe that the RSPO Next is the best step towards this continued progress, and hope in the future that these standards will be required for all RSPO members, and not jus the volunteers.
- 21 **Sep 24, 2015 10:17 AM**
- 22 **Aug 19, 2015 9:51 PM** These seem like good steps, well thought out and with a real focus on retaining habitat, species, and addressing human rights issues. Good work.
- 23 **Aug 10, 2015 7:13 AM** Make sure all acronyms are defined

RSPO NEXT PUBLIC COMMENT

Please let us know if you found the online structure of this process effective. If you have any other suggestions on how to improve the process we would appreciate hearing from you. Please share them here.

Answer Options	Response Count
	21

Number	Response Date	Response Text
1	Oct 8, 2015 12:10 PM	Excellent system, easy to navigate. Thank you. It would be useful if the consultation questions could also be downloaded as a word document as multiple colleagues need to input - it's much easier to do this if it can be circulated in word format before answers are finalised
2	Oct 6, 2015 5:27 PM	and inputted into the online questionnaire.
3	Oct 6, 2015 5:27 PM	I think the structure of this process is very effective and easy to provide input.
4	Oct 6, 2015 4:06 PM	submitted via email with a table attached - copied into the online portal
5	Oct 6, 2015 2:59 PM	Submitted by template - copied into online portal
6	Oct 6, 2015 2:43 PM	Submitted via email - manually entered into online system
7	Oct 6, 2015 2:36 PM	Submitted by email in free form - manually entered into online portal
8	Oct 6, 2015 1:47 PM	letter submitted in lieu of comments - manually entered into online system
9	Oct 6, 2015 1:06 PM	independent submission via template - manually added to online system
10	Oct 6, 2015 12:10 PM	manually entered
11	Oct 6, 2015 6:38 AM	Yes, I found this format to be helpful.
12	Oct 6, 2015 12:31 AM	Yes, it is very effective and easy to provide inputs.
13	Oct 5, 2015 4:07 PM	No Comment
14	Oct 5, 2015 8:29 AM	Process is acceptable.
15	Oct 1, 2015 5:41 PM	It would be helpful if there was the possibility to review all comments in a single document before hitting final 'submit'. Otherwise this format was effective.
16	Oct 1, 2015 7:14 AM	Yes
17	Sep 28, 2015 4:26 AM	Effective and easy to use.
18	Sep 24, 2015 10:17 AM	The process is very effective. We appreciate that the RSPO has taken the time to get feedback from stakeholders before finalizing the RSPO Next standards.
19	Aug 19, 2015 12:09 PM	too lengthy
20	Aug 17, 2015 11:48 AM	the process was straightforward and not too lengthy
21	Aug 10, 2015 7:13 AM	Well laid out and well structured - very easy to make comments