

# RSPO SHARED RESPONSIBILITY VERIFICATION MANUAL

February 2024

Document Title : RSPO Shared Responsibility Verification Manual

Document Code :

Scope : International

Document Type :

Approval :

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**The content of this Shared Responsibility Verification Manual comes into effect after it is endorsed by the RSPO Board of Governors (BoG).**



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## LIST OF ACRONYMS

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<b>ACOP</b>	Annual Communication of Progress
<b>B&amp;Is</b>	Banks and Investors
<b>BoG</b>	RSPO Board of Governors
<b>CB</b>	Certification Body
<b>CGMs</b>	Consumer Goods Manufacturers
<b>CSPO</b>	Certified Sustainable Palm Oil
<b>eNGOs</b>	Environmental NGOs
<b>GA</b>	General Assembly
<b>P&amp;C</b>	Principles and Criteria
<b>P&amp;Ts</b>	Processors and Traders
<b>RSPO</b>	Roundtable on Sustainable Palm Oil
<b>RT</b>	Retailers
<b>SCC</b>	Supply Chain Certification
<b>sNGOs</b>	Social NGOs
<b>SR</b>	Shared Responsibility
<b>SRTF</b>	Shared Responsibility Task Force
<b>SRWG</b>	Shared Responsibility Working Group
<b>VM</b>	Verification Manual

## 1. BACKGROUND AND CONTEXT

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All members of the Roundtable on Sustainable Palm Oil (RSPO) have the responsibility and are committed to support the vision “a global partnership to make palm oil sustainable”. The RSPO Theory of Change is a roadmap that demonstrates how RSPO will achieve this vision through key strategies and activities that RSPO will implement together with members, partners and other actors. The process for change at RSPO is characterised by a progression of “Mobilise, Act and Transform”. This is the backbone of the RSPO Theory of Change and underpinned by the concept of shared responsibility and accountability for results.

The concept of Shared Responsibility (SR) has been discussed and agreed upon for a number of years across members. The 8th General Assembly (GA8) in 2012 recognised some of the barriers including clear guidance of the contribution of Ordinary members, as well as sanctions ([Resolution 6m](#)). GA9 reiterated this in [Resolution 6D](#):

- Keeping in mind many elements of the Principles and Criteria (P&C) are applicable to all types of responsible organisations, regardless of business interest, geography, or scale.
- Emphasising that a uniform standard applicable to all Ordinary members is only fair and equitable.

All RSPO members share the responsibility for achieving the vision “a global partnership to make palm oil sustainable”. There is the need to define more explicitly what this means in terms of accountability – to each other and to all stakeholders who support RSPO. Members have different roles in contributing to the shared vision of a global partnership to make palm oil sustainable. During the P&C revision process in 2018, the mechanism of accountability was discussed and explored with wide agreement on the concept of Shared Responsibility.

While the P&C is applicable to the *production* of sustainable palm oil, the RSPO Code of Conduct for Members, clause 3.2, applicable to all members, requires: “3.2 In being committed towards the production, procurement and use of Sustainable Palm Oil, members to whom the P&C do not apply directly shall adopt and implement environmental and social standards no lower than those set out in the P&C.”

It was agreed that a transparent process would need to be established and the [Shared Responsibility Taskforce \(SRTF\)](#) set up in early 2019. They were tasked with developing the requirements for Shared Responsibility and propose recommendations for the implementation mechanism. The results of the ten-month process include the “Shared Responsibility Requirements and Implementation” document, which was endorsed by the RSPO Board of Governors (BoG) on 31 October 2019. There are 29 SR requirements across different thematic areas as shown in Figure 1.

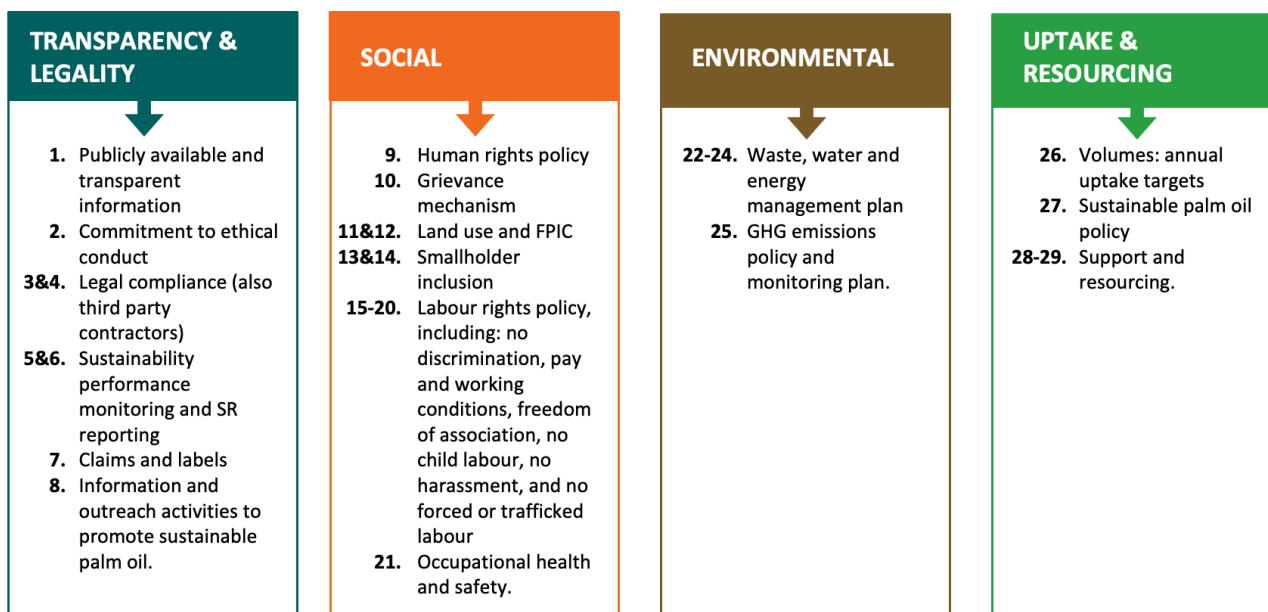


Figure 1. Overview of the Shared Responsibility requirements

To work on the implementation of the SRTF recommendations as outlined in the “[Shared Responsibility Requirements and Implementation](#)” document, including questions and challenges raised during the process, the BoG established the Shared Responsibility Working Group (SRWG).

The Verification Manual (VM) describes the process to verify the implementation of SR requirements. The purpose of this document is:

- To establish a verification methodology to verify the implementation and compliance of Shared Responsibility requirements by members of RSPO to whom the SR requirements are applicable.
- To establish a framework to incentivise compliance to the requirements and corresponding sanctions for failure to do so.

The Verification Manual provides information to RSPO members on the verification process, incentives and sanctions related to SR implementation. There are no normative requirements for RSPO members in this document. The SR requirements are included in the Annex 1 of the “[Shared Responsibility and Implementation](#)” document. Members shall refer to this SR Verification Manual to understand the reporting process on their SR performance; i.e. SR reporting on ACOP and MyRSPO.

When there is contradictory information and/or discrepancies between the “Shared Responsibility and Implementation” document and the Verification Manual, the Verification Manual prevails (e.g. Scope: size). In addition, the Verification Manual clarifies and includes relevant information (e.g. Scope: mergers and acquisitions).

In line with the above, this Verification Manual clarifies that when there is a mismatch in Annex 1 of the Shared Responsibility and Implementation document between the request of the general and the specific SR requirements per stakeholder category (i.e. P&T, CGM, etc.), the rule is that the specific requirement prevails over the general (e.g. SR16 - Pay and working conditions).

## 1.1 Scope

It is important to understand who and what the SR requirements apply to, in order to ensure they are relevant and feasible to implement. SR requirements apply to members regardless of their certification status, i.e. holding Supply Chain Certification (SCC). Five areas of scope are outlined below: membership category, size, palm oil activities, site/group and acquisitions.

### 1.1.1 Scope: Membership Category

The SR requirements apply to Ordinary members of RSPO of the following membership categories: Processors and Traders (P&T), Consumer Goods Manufacturers (CGM), Retailers (RT), Banks and Investors (B&I), Environmental NGOs (eNGOs) and Social NGOs (sNGOs).

Grower members of the RSPO implement the RSPO Principles and Criteria (P&C) for the production of sustainable palm oil and therefore do not have to implement the SR requirements. Supply Chain Associates, Affiliates and those RSPO members holding only a traders' or distributors' licence, as defined in the [Supply Chain Certification \(SCC\) Standard](#) and definitions section of this VM, are currently exempt from SR, due to their limited role in driving Certified Sustainable Palm Oil (CSPO) uptake.

Ordinary members who switch membership category to Associate, due to unforeseen reasons that decrease their palm oil volumes consumption, and switch back to Ordinary a few years later are considered "new" members whose SR uptake targets restart from the beginning, i.e. their first ACOP submission after becoming Ordinary again is used as the baseline.

### 1.1.2 Scope: Size

Irrespective of the size of the organisation, SR requirements apply equally to all membership categories as defined in Section 1.1.1.

### 1.1.3 Scope: Activities. Palm Oil vs. all activities

The scope of the SR requirements is specific to palm oil related activities of RSPO members, as the P&C is for growers' palm oil activities only. This ensures relevance and applicability and for organisations with limited palm oil activities, there is no disincentive. At a minimum, the requirements must be applied for palm oil related activities. If there is already a system in place that meets the SR requirements that is inclusive of all activities of the organisation, this is acceptable. If there is nothing in place at the level of the member's organisation that addresses the SR requirements, then, as a minimum, something must be put in place for palm oil related activities.

### 1.1.4 Scope: Group vs Site level

All SR requirements are applicable at the group level. For all SR requirements, it is acceptable to refer to group level policies submitted via the MyRSPO portal. Policies are applicable across all of the member's business units.

### 1.1.5 Scope: Mergers and Acquisitions

Any new acquisitions or mergers by RSPO Ordinary members subject to SR requirements are expected to be compliant as new members have to report on SR performance in MyRSPO upon membership application. Any overarching policies/plans that are replaced are expected to take effect as per the implementation plan during the acquisition/merger process.

While acquisitions do not result in a new membership number (as RSPO members just acquire assets for their companies), mergers do result in a new company that triggers a new membership number. Therefore, for these considered "new" companies, the SR uptake target restarts once they get the new membership number.

## 2. DEFINITIONS

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For Shared Responsibility and accountability to work, it is important that members have a common language and use common definitions<sup>1</sup> across contexts and actors.

Term	Definition
<b>Distributor's license</b>	An annual request submitted by the distributor through the RSPO IT platform that allows them to trade and/or claim RSPO certified products. When selling RSPO certified products, the licensed distributor must pass on the certificate number of the product manufacturer and the applicable supply chain model.
<b>Group Level</b>	It refers to the level to which RSPO Ordinary members shall report and be verified on SR performance. I.e. if a member is listed as group membership in RSPO, only the parent of the group membership is required to submit the SR performance on behalf of all its palm-related subsidiaries
<b>CSPO</b>	<b>Certified Sustainable Palm Oil.</b> Palm oil produced by a mill (including independent mill) if the FFB/palm fruit are sourced from plantations/estates that have been certified against the RSPO Principles and Criteria (P&C).
<b>Shared Responsibility<sup>2</sup></b>	The set of responsibilities RSPO members must commit to for achieving the vision "A GLOBAL PARTNERSHIP TO MAKE PALM OIL SUSTAINABLE".
<b>Supply chain</b>	The series of processes/steps through which agricultural raw materials pass from the primary producer through to the end product manufacturer (i.e. oil palm growing, palm oil milling, storage, transport, refining, manufacture, end product, etc.).
<b>Trader's License</b>	An annual request submitted by the trader through the RSPO IT platform that allows them to trade and/or claim RSPO certified products. When selling RSPO certified products, a licensed trader must pass on the certificate number of the product manufacturer and the applicable supply chain model.

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<sup>1</sup> Definitions as shown in key RSPO documents ( e.g. RSPO P&C for Production of Sustainable Palm Oil, RSPO Supply Chain Certification Standard, RSPO Supply Chain Certification Systems, RSPO Rules on Market Communications & Claims, ACOP Guidelines)

<sup>2</sup> Definition defined by the SRWG.



### 3. VERIFICATION PROCESS

Verification ensures the accountability and reliability of the reported SR requirements, which is critical for the credibility and legitimacy of RSPO and its members.

#### 3.1 Reporting tools and data collection for Shared Responsibility performance.

The key tools for reporting on SR requirements are shown in Table 1.

Table 1. SR reporting

RSPO tool	Membership	Purpose	When to report
Annual Communication of Progress (ACOP)	All Ordinary non-grower existing members	Annual reporting on the implementation of all SR requirements and CSPO uptake.  The SR ACOP questions also serve as a reminder to upload the evidence in the MyRSPO portal.	During ACOP submission period
MyRSPO portal	All Ordinary non-grower existing and new* members	Upload all evidence (e.g. policies, reports or plans) required to show compliance with the SR requirements, which are publicly visible on the member's page	Any time of the year (preferably after ACOP submission)

\*The SR questions are included in the RSPO **Membership application form (via MyRSPO)**. RSPO Membership is only granted if all SR relevant data that is required during membership application<sup>3</sup> is provided in full, or if the Declaration of Support has been provided.

#### 3.1.1 ACOP submission

The Annual Communication of Progress (ACOP) are reports submitted by RSPO Members to gauge their progress towards 100% RSPO Certified Sustainable Palm Oil. These reports are mandatory for Ordinary members who have completed a full year of RSPO membership at the time of ACOP reporting, and are submitted each year.

ACOP includes specific questions on SR requirements functioning as a reminder to submit the SR performance evidence in MyRSPO.

Ordinary non-grower members shall also report their uptake volumes (certified and total) in ACOP. As per the SR requirement on uptake volume (Figure 1- SR requirement 26), the members shall aim for an increase in the sustainable volume uptake, which is in line with the uptake targets endorsed and communicated

<sup>3</sup> Refer to the Guide on SR declaration on MyRSPO: [https://rspo.org/library/lib\\_files/preview/1485](https://rspo.org/library/lib_files/preview/1485)

yearly. They may refer to the [RSPO Factsheet on calculation for yearly Shared Responsibility Uptake Target volume](#) to learn about how to comply with the uptake volume SR requirement.

For members to self assess their uptake performance, they shall note the following: the uptake target baseline is annually calculated based on the actual, used volumes of the previous year, reported in the previous ACOP. For new members the baseline is based on the uptake volume reported during their Membership application.

The SR uptake target performance is calculated by the Secretariat based on the ACOP reporting on uptake volumes (see section 3.2.1.1). This performance related to the uptake target is part of the [SR Scorecard](#) published in the RSPO website.

### 3.1.2 MyRSPO portal

MyRSPO is an online members portal that allows members to update their membership profile and details.

Ordinary non-grower members are requested to submit evidence of their SR performance (Figure 1- all SR requirements except number 26) in the MyRSPO portal:

- New members shall provide their SR evidence upon submission of their membership application.
- Existing members are requested to submit/upload their SR evidence preferably after the ACOP submission. The portal is open any time of the year.

The “Declaration of Support” appears as an option under the SR Section in the MyRSPO portal to cover RSPO Members who do not currently have the evidence to show compliance. The member commits to develop the evidence of implementation to its earliest possibility.

**Applies to:** all SR requirements in the MyRSPO portal

*I acknowledge that I, as a member of the RSPO, support the Principles, Criteria and Standards of the RSPO, which include the Shared Responsibility requirements. I acknowledge that my company/organisation does not currently have the evidence to show compliance with all or some of the identified Shared Responsibility requirements in this section. In place, I provide a Declaration of Support stating that I endorse the fundamental principles of this Shared Responsibility requirement, until such a time when I am able to develop the needed evidence to show compliance with this requirement.*

Members may refer to [MyRSPO Guide on Declaration of Shared Responsibility](#) to learn on how to upload the evidence of SR performance in MyRSPO profile.

### 3.2 Verification of SR requirements

Owing to the nature of the SR requirements, a two-step process of verification is conducted to ensure the successful implementation of the SR requirements, as shown in Figure 2.

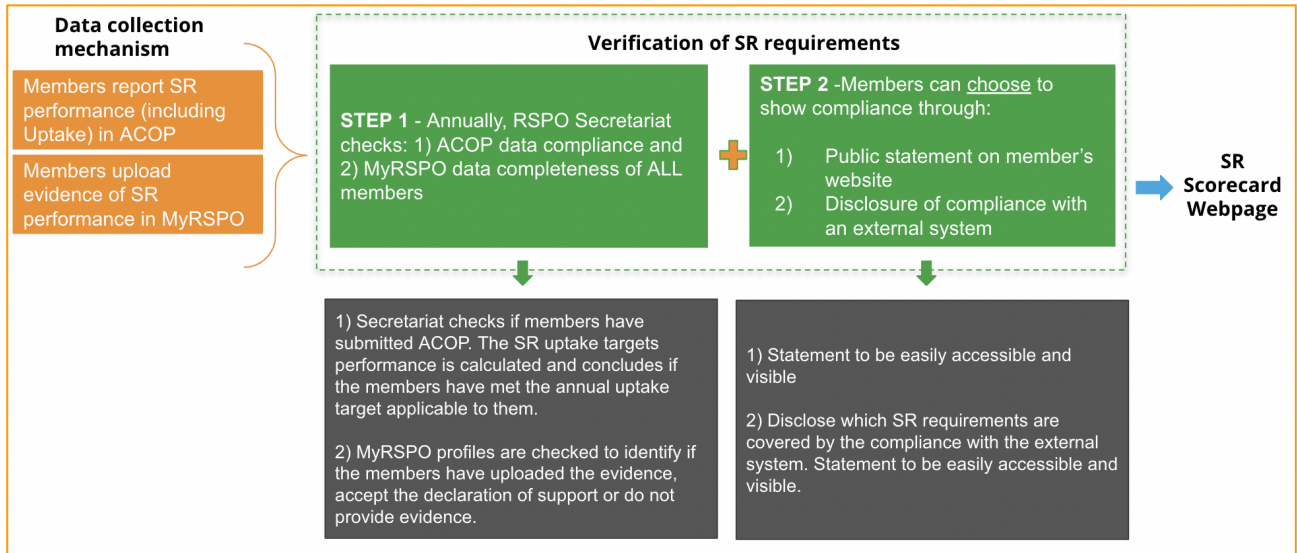


Figure 2. Two-steps verification process

#### 3.2.1 Step 1: ACOP data compliance and MyRSPO data completeness

All Ordinary non-grower members shall report SR performance in ACOP and the MyRSPO portal, at group level when applicable. The RSPO Secretariat assesses compliance of the ACOP SR data (i.e., Uptake volume) and completeness (not quality) of the SR elements in the MyRSPO portal annually.

##### 3.2.1.1 ACOP data compliance

The RSPO Secretariat assesses incomplete data during the official ACOP submission period to the best of its abilities. As per existing ACOP procedures, the ACOP team verifies all received ACOP reports and contacts the member to complete or clarify any incomplete data before the closure of the ACOP submission period. If the member still fails to complete the missing information, they are considered as an ACOP non-submitter and the sanction mechanism applies (see Section 4 Incentives and Sanctions).

Referring to the uptake volumes (certified and total) reported by RSPO Members in ACOP, the RSPO Secretariat assesses the uptake performance of members, taking into account that the uptake target baseline is annually calculated based on the actual, used volumes of the previous year, reported in the previous ACOP. For new members, the baseline is based on the uptake volume reported during their Membership application. This assessment of compliance concludes if the members have met the annual uptake target applicable to them, and it is included in the [SR Scorecard](#) published in the RSPO website.

Members who do not comply with the SR uptake target are contacted in order to understand their underperformance in the SR volume requirement.

### 3.2.1.2 MyRSPO data completeness

On an annual basis, the RSPO Secretariat does a completeness check of the SR performance section of members' MyRSPO profiles. This check aims to identify if the members have uploaded the evidence that shows their SR performance, have accepted the declaration of support or have not provided evidence. This assessment of completeness is part of the [SR Scorecard](#) published in the RSPO website.

### 3.2.2 Step 2: Verification of SR requirements

RSPO Members are requested to assure their SR compliance choosing one and/or both of the following actions:

#### 3.2.2.1 Make a public statement on member's website:

Members are requested to publicly state that they comply with the SR requirements, as per their SR evidence declaration in their MyRSPO profile. This statement shall be easily accessible and visible in the public domain, e.g., corporate website and shall be indicated in the MyRSPO profile, SR section.

#### 3.2.2.2 Disclosure of compliance with an external system:

Members may have Environmental, Social, and Corporate Governance (ESG) reports/systems already in place that are externally audited and verified. These systems may cover one or several SR requirements. Members can therefore choose this option, indicating the sustainability system and the SR requirement(s) covered by such a system and which compliance is thus externally verified. This shall be indicated in the MyRSPO profile, SR section.

## 4. INCENTIVES AND SANCTIONS

Incentives and Sanctions are focused on shifting behaviour with an emphasis on positive reinforcement rather than response to infractions. The intent of sanctions is to encourage underperforming RSPO Members to improve their Shared Responsibility performance. Sanctions play a critical role in achieving SR implementation and ensuring accountability.

### 4.1 Incentives

#### 4.1.1 SR performance Scorecard

The RSPO Secretariat has developed the [RSPO Shared Responsibility Scorecard](#) webpage to show the SR performance of RSPO Members. The SR performance scoring methodology is publicly available on the website. The scores are tabulated based on members' self-reported public commitments in MyRSPO and ACOP (See section 3 of Verification Process), and are an indication as to where members are in their sustainable palm oil journey. Scores range between 0 and 10, 10 being the maximum score.

The SR Scorecard acts both as an incentive for members to improve their SR performance, as well as to have a transparent monitoring system showing the sustainability journey of RSPO Members.

#### 4.1.2 Public Recognition

RSPO Members who are identified in the SR Scorecard as top performers are publicly recognised via the RSPO platforms. Some examples are:

- Awards session rewarding their performance during key RSPO events (e.g Excellence Awards Ceremony Global RT).
- Opportunity to be a speaker in key events/sessions showcasing their SR implementation and sustainability journey (e.g., SR workshops during Global RT)
- Interviews to showcase the SR efforts in the official RSPO communication channels (e.g., RSPO EGazette)
- Social media toolkits to promote their SR performance (i.e. SR Scorecard toolkit)

### 4.2 Sanctions

The types of sanctions will be periodically reviewed by the SRWG. The RSPO Secretariat will manage the sanctions process (i.e., issuing of sanctions, list of potential suspensions/termination, letter mechanism). The triggers of sanctions are shown in Table 2.

Table 2. Overview of triggers of sanctions

What	Sanction
Failure to submit ACOP (including SR reporting requirements)	Following the standard ACOP sanction mechanism: <ul style="list-style-type: none"><li>- First non-submission: Warning letter</li><li>- Second consecutive non-submission: Suspension of membership</li><li>- Third consecutive non-submission: Termination of membership</li></ul>

**Table 2. Overview of triggers of sanctions**

<p>Failure to report in MyRSPO SR Section.</p>	<ul style="list-style-type: none"> <li>- First year of non-reporting: Warning letter</li> <li>- Second consecutive year non-reporting: Warning letter</li> <li>- Third consecutive year of non-reporting: Recommendation<sup>4</sup> to the BoG for suspension of membership</li> <li>- Fourth consecutive year of non-reporting: Recommendation<sup>5</sup> to the BoG for termination of membership</li> </ul>
<p>Failure to report on Step 2 of the verification process</p>	<p>Publish performance in the SR Scorecard</p>

Members who fail to meet the uptake targets, and/or have a deficient SR performance are publicly shown in the [SR Scorecard](#) as not meeting the target. An overview of the CSPO uptake performance of all members is also publicly available in the [SR Scorecard dashboards](#).

In addition, members who do not comply with the SR uptake target are annually contacted in order to understand their underperformance in the SR volume requirement.

<sup>4</sup> List of members recommended to be suspended with the justifications given by the members.

<sup>5</sup> List of members recommended to be terminated with the justifications given by the members.

RSPO is an international non-profit organisation formed in 2004 with the objective to promote the growth and use of sustainable oil palm products through credible global standards and engagement of stakeholders.

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