

**Compilation of comments from public consultation on
'DRAFT – RSPO NEW PLANTING PROCEDURE'
(Revision June 2015, Version 2)**

3rd August - 2nd October 2015

General comments

Category of comment	Comments received	Language	English translation	Source of comment	RSPO Response
Add more specific detail or explanation	Need additional section for 'guidance for CB'. This is to avoid multiple interpretation.	English	N/A	Inti Indosawit Subur	Some guidance is given for CB verification.
Add more specific detail or explanation	Keterangan warna kuning dan hijau kurang jelas, perlu adanya penjelasan lebih lanjut untuk menghindari kesalahpahaman.	Bahasa	Notes in yellow and green highlights are unclear. Further explanations are, therefore, necessary to avoid misunderstanding.	Indonesia workshop	Noted. In the final version, there is no highlighting.
Add more specific detail or explanation	Need additional section for 'background why NPP implemented by RSPO (history)'	English	N/A	Indonesia workshop	Noted and incorporated.
Add more specific detail or explanation	Need additional section for 'background why NPP is needed to be implemented by RSPO'.	English	N/A	Inti Indosawit Subur	Noted and incorporated.
Add more specific detail or explanation	Need additional section for 'guidance for CB'	English	N/A	Indonesia workshop	Noted and incorporated.
Add more specific detail or explanation	Pas d'information claires sur la responsabilité ou rôle des petits planteurs ;	French	No clear information about the responsibility or role of smallholders	Gabon workshop	Box 1 on smallholders clarifies that all aspects of NPP apply.

Add more specific detail or explanation	Pas d'informations claires sur les étapes à suivre par les producteurs non-membres qui veulent s'engager dans la NPP	French	No clear information about the steps to be followed by non-member producers who want to engage in the NPP	Gabon workshop	Non members do not have to submit NPP to RSPO. Only RSPO members are required to conduct and submit NPP. Nevertheless non members are free to use NPP as a guideline for responsible new development
Add more specific detail or explanation	Simplify checklist for NPP should be created	English	N/A	Thai stakeholders	Please refer to reporting template to check what is required to be submitted
Add more specific detail or explanation	The lack of clarity on compensation rates needs to be addressed, given the difficulty of access to finance in Africa.	English	N/A	Ghana workshop	N/A Refer to compensation procedure
Add more specific detail or explanation	The procedure needs to clarify the producers' responsibilities according to the dates in which palm plantations were planted (after 2005, 2007 and 2010) and how to act according to the NPP. There is a mix of concepts that needs to be clear to avoid misunderstanding.	English	N/A	NES Naturaleza	NPP is only applicable for land development after 1 Jan 2010. This has been clarified in the text

Add more specific detail or explanation	There is a need for a clear explanation on why there is a requirement on HCV, LUC and socio-environmental impact studies in areas already cultivated. Why such a big investment is needed in areas already affected. That will limit the investment of small growers and others.	English	N/A	NES Naturaleza	HCV assessment, LUC and socioeconomic studies are required by the RSPO P&C. Any company/operation wanting to get certified must carry out such assessments. Similarly, such assessments are required for a company conducting new plantings.
Add more specific detail or explanation	There is a need for clarity on the definition for “new development”.	English	N/A	GAR	Noted and incorporated.
Add more specific detail or explanation	We request for additional section for ‘guidance for CB’ to ensure clarity in apply NPP in the verification process.	English	N/A	GAR	Noted and incorporated.
Clarify consequences of non-compliance	The document should also provide greater clarity on the sanction for not submitting and NPP and in particular avoid assuming that all that is required is compensation;	English	N/A	WWF	Noted.
Clarify consequences of non-compliance	The implications/consequences of non-compliance with the NPP before and after the consultation period must be made more explicit. Referral to CTF is too vague (‘black box’). What role for the Complaints Panel? ASI?	English	N/A	Aidenvironment	Noted.

Complaints and commenting process	Given the significant risk of non-compliance during land development post NPP, the absence of structured monitoring for a considerable number of years and the high risk of post hoc justification of non-compliances that typically come at the expense of HCVs, HCS, peatland and community rights, there must be a better mechanism that enables public commenting beyond 30 days if the number of full fledged formal complaints is to be reduced to minimum	English	N/A	Aidenvironment	Comments period will remain at 30 days. Time may be required to address specific comments raised.
Consultation process	All input from the public consultation must be treated in transparent manner. The input should be published in the website and rejected inputs should be provided with explanation.	English	N/A	Inti Indosawit Subur	Comments received will be placed on the web.
Consultation process	All comments from stakeholders during 60-day public consultation related to this proposed revision of NPP, shall be recorded, justified accordingly by the RSPO Secretariat. The responses of the RSPO shall be shared in the RSPO website and other media to ensure that stakeholders know exactly if their inputs are accepted or not.	English	N/A	First Resources	Comments received will be placed on the web.

Consultation process	All input must respect the transparency, all input from the PC and etc should be publish and all input not accepted should be justified.	English	N/A	Indonesia workshop	Comments received will be placed on the web.
Consultation process	Final draft needs to be shared to all participants for final review at least two weeks before sending to BoG.	English	N/A	Inti Indosawit Subur	Comments received will be placed on the web.
Consultation process	Final review before send to BoD need to be shared to all participants for final review (at least two weeks before sent)	English	N/A	Indonesia workshop	Comments received will be placed on the web.
Consultation process	The final review incorporating all the feedback from the public consultations conducted must be shared with all participants and growers before forwarding to the RSPO BoG for approval. The final review document to be circulated at least two week to the RSPO BoG submission.	English	N/A	GAR	Comments received will be placed on the web.
Consultation process	The inputs from the public consultations must respect the Chatham House rule and should be published in the RSPO website. Any inputs not accepted must be clarified.	English	N/A	GAR	Comments received will be placed on the web.
Consultation process	The inputs from the public consultations should be clarified	English	N/A	Sinar Mas	Comments received will be placed on the web.
Different sizes of growers	The NPP requirements should be tailored to the scale of operations (i.e. estates versus smallholders)	English	N/A	Ghana workshop	Comments received are recorded and will be placed on the web.

Document structure and syntax	En su versión actual el documento está redactado como un híbrido entre explicativo y normativo. Se sugiere redactarlo como normativo, con una numeración consecutiva por secciones	Spanish	In its present version the document has been drafted as a cross between an explanatory and a prescriptive text. It is recommended that it be drafted in a prescriptive way, and numbered consecutively section by section.	Colombia workshop	Comments received are recorded and will be placed on the web.
Document structure and syntax	Esta versión es más organizada y amigable que los documentos anteriores.	Spanish	This version is more organized and more user-friendly than the previous documents.	Colombia workshop	Noted
Document structure and syntax	1. El documento debería ser más amigable en vista que será usado también por pequeños productores.	Spanish	The document should be more user-friendly, as it will also be used by smallholders.	Jaremar	Noted
Document structure and syntax	A guideline for companies under the recertification who are planning NPP should be included.	English	N/A	NES Naturaleza	If the new planting is taking place within the boundary of the certified area, NPP is not applicable.
Document structure and syntax	Ease of use can be improved: <ul style="list-style-type: none"> o Numbering o Break to short sentences or bullet points o The Grower shall... 	English	N/A	Malaysia workshop	Noted and incorporated where possible

Document structure and syntax	Facilidad de uso. Agregar vínculos de ubicación de los documentos de apoyo (página 17, algunos de los cuales no son muy conocidos), sus nombres oficiales y explicar su relación con el proceso de NPP, cuáles son normativos y cuáles explicativos	Spanish	Ease of use. Add weblinks to the supporting documents (page 17, some of which are not very well known), giving their official names and explaining their relationship to the NPP process stating which are prescriptive and which explanatory	Colombia workshop	Noted, but we prefer not to put weblinks the document as these may become outdated
Document structure and syntax	Faire attention sur l'utilisation du « conditionnel et le futur » dans la traduction du document pour distinguer les obligations et les recommandations	French	Be careful about using the "conditional and the future" in the translation of the document to distinguish between obligations and recommendations.	Gabon workshop	Noted
Document structure and syntax	Format of all document should be improved for comfortable and easy to read.	English	N/A	Thai stakeholders	Noted

Document structure and syntax	Hacer una separación por tipología, es decir, que se indique para quién aplica cada segmento del documento dependiendo de su rol y cuáles son las fechas de cumplimiento para cada uno de los casos posibles	Spanish	Separate by type; in other words indicate to whom each segment of the document applies, depending on their role and the compliance deadlines, where applicable.	Colombia workshop	Noted and incorporated
Document structure and syntax	Improve and standardize formatting throughout document i.e. boxes, spacing, margins, etc.	English	N/A	Malaysia workshop	Noted and incorporated
Document structure and syntax	NPP Report and its constituents should be defined consistently throughout document and in line with Annex 2 chart.	English	N/A	Malaysia workshop	Noted and incorporated
Document structure and syntax	Numbering of points needs to be better defined in a logical progression.	English	N/A	Malaysia workshop	Noted and incorporated
Document structure and syntax	Numbering or bullet point should be improved	English	N/A	Thai stakeholders	Noted and incorporated
Document structure and syntax	Overall footnote to be standardised (footnote not available)	English	N/A	Malaysia workshop	Noted and incorporated
Document structure and syntax	Overall footnote to be standardised or removed (footnote not available)	English	N/A	Genting Plantations	Noted and incorporated
Document structure and syntax	Some concepts should be better explained. The definition of some terms needs to give more clarity to the reader.	English	N/A	NES Naturaleza	Noted and incorporated

Document structure and syntax	Standardisation of terms e.g. New oil palm planting or new oil palm development is mentioned in glossary but 'new development is mentioned elsewhere in the document.	English	N/A	Genting Plantations	Noted and incorporated
Document structure and syntax	Standardisation of terms e.g. new oil palm planting or new oil palm development is mentioned in glossary but 'new development is mentioned elsewhere in the document.	English	N/A	Malaysia workshop	Noted and incorporated
Document structure and syntax	The fact that the document is redirecting the reader to another related document complicates the understanding of the text.	English	N/A	NES Naturaleza	Reference to other documents are necessary to avoid lengthy and unnecessary explanation or duplication.
Document structure and syntax	Usage of words 'shall', 'should' and 'will' needs to be consistent throughout document.	English	N/A	Malaysia workshop	Noted and incorporated
Document structure and syntax	Whenever there is mention of other documents e.g. 'see RSPO 7.1' the document needs to be attached	English	N/A	Malaysia workshop	This will make the NPP document unnecessarily long.
Document structure and syntax	Whenever there is mention of other documents e.g. 'see RSPO 7.1' the document needs to be attached as Annex.	English	N/A	Genting Plantations	This will make the NPP document unnecessarily long.
External consistency	cross reference should be done with other RSPO relevant document, ex : RSPO FPIC guidance	English	N/A	Indonesia workshop	Noted and incorporated

External consistency	The text must cross reference with other RSPO relevant documents (eg. RSPO FPIC guidance) for consistency and clarity. Examples on inconsistency in document are Section 2, step 2 seem to imply FPIC started; however on section 5, the CB needs to verify that FPIC completed.	English	N/A	GAR	Noted.
External consistency	There should be some integration with regulations on peatland ecosystem. There is a new regulation on peatland being implement. The enhanced NPP must consider the national legal process (NI).	English	N/A	GAR	The document used NI as reference point.
Graphics	Graphics, charts and images could help for a better understanding for the document.	English	N/A	NES Naturaleza	Noted and incorporated where possible
Graphics	Integrated Master flow chart is not available,	English	N/A	Indonesia workshop	Noted
Graphics	More flowchart to be added for clarity and easy understanding.	English	N/A	Genting Plantations	Noted and incorporated where possible
Graphics	More flowchart to be added for clarity and easy understanding.	English	N/A	Malaysia workshop	Noted and incorporated where possible
Graphics	Sería más útil incluir flujogramas y mapas conceptuales para cada paso del proceso en el documento	Spanish	It would be more useful if flowcharts and interactive maps were included in the document for every step of the process.	Colombia workshop	Noted and incorporated where possible

Graphics	Should make an Integrated Master flow chart that summarises the step 1-7.	English	N/A	Inti Indosawit Subur	Noted
Graphics	There should be an integrated master flow chart for easy reference and understanding of the enhanced NPP.	English	N/A	GAR	Noted
Graphics	There should be major flowchart profiling the process of NNPP (not only mechanism of comment – Annex 2)	English	N/A	First Resources	Noted
Implementation	After BoG approval, we need transition period of at least one year.	English	N/A	Inti Indosawit Subur	Transition period is recommended to be 6 months. Within the 6 month period submission can be made either using the old doc or the new doc. After the 6 month period, all submission must be against the new document.
Implementation	Cómo asegurar la consistencia entre documentos RSPO dado que algunos aspectos tratados en este documento serán afectados por otros procesos de consulta pública-revisión que están ocurriendo en paralelo (GC, R&C).	Spanish	How to maintain consistency between the RSPO documents given that some of the aspects dealt with in this document will be affected by other public consultation and revision processes which are taking place in parallel (GC, R&C)	Colombia workshop	It will make reference to the current document as well as its revision.

Implementation	Enforcement of the NPP currently relies on self-submission by members, ACOP reporting and 'complaints procedure' exposing non-submitters. Is this enough? Anecdotal evidence would suggest not and that several members are not submitting. Therefore the RSPO needs to develop a process for ensuring that the NPP is being implemented and being monitored adequately. This should include: <ul style="list-style-type: none"> • CBs being required to verify that NPPs have been implemented for all relevant operations during audit assessments. • Use of remote sensing to indicate where expansion is happening • Review company annual reports and financial reports • More concerted communications to members about NPP requirements 	English	N/A	WWF	A guidance for CB is being developed. A checklist for NPP will also be developed.
Implementation	Feasibility of implementation and ease of use of the NPP are becoming increasingly difficult for both the growers and investors. This is because most projects are already started and the new changes may require major adjustments that may be difficult to apply.	English	N/A	Ghana workshop	This update is to better clarify as well as incorporate new requirement. Companies and investors should have been aware of the basic NPP process.

Implementation	For the implementation of this document to be in line with Annex 1: 1.3 which is applicable as of 1st Jan 2017,	English	N/A	Malaysia workshop	The Carbon and GHG assessment is required for all NPPs submitted from 1st Jan 2015. However, the report will not be published alongside the standard NPP public notification documents. Public reporting is mandatory after 1st Jan 2017.
Implementation	From (“Posición País modificación PNP.docx”):Aunque el contenido y forma del documento, en general se aprueba, consideramos se podrían mejor algunos aspectos ... Sin embargo, encontramos las dificultades se darán mayormente durante la interpretación y aplicación de los requisitos de RSPO.La legislación ambiental guatemalteca, a través del Decreto 68-86, exige se obtenga la resolución aprobatoria de un instrumento ambiental para cualquier proyecto a desarrollar. Los instrumentos ambientales pueden ser EIA’s o diagnósticos, entre otros dependiendo de la naturaleza del proyecto. Sin embargo, posteriormente se debe obtener una licencia para el proyecto, esta licencia únicamente es válida con el pago, cada dos años, de un seguro de caución. Todo esto está regulado por el Reglamento evaluación, control y seguimiento ambiental 60-2015. Sin embargo, la realidad de la	Spanish	From “Posición País modificación PNP.docx ”While the documents are generally acceptable as far as content and form are concerned, we feel that some aspects could be improved... Problems are likely to arise, however, in the interpretation and application of the RSPO requirements. Pursuant to Decree 68-86, Guatemalan environmental legislation requires the adoption of a resolution approving an environmental instrument before any project can be carried out. These environmental	Grepalma	NPP is separate form legal compliance. If the assessment as required for NPP is also required by the law, then the same study report can be used for both purpose. But if it is not within the law, then any new oil palm development shall comply NPP requirement.

institución que regula los temas ambientales, carece de un presupuesto y por lo tanto, de recursos humanos para asegurar el correcto y oportuno procesamiento de los instrumentos ambientales exigidos por la ley, que en muchos casos, cae en retrasos administrativos. Por lo tanto, respecto al Paso 3.1 consideramos es necesario definir a nivel nacional, para RSPO, en qué punto el EIA estaría cumpliendo con lo que establece la certificación RSPO. Respecto a la caja 1 Guía sobre las calificaciones de los evaluadores, se establecen únicamente dos requisitos para las auditores internos, así mismo se mencionan ciertos requisitos para auditorías o estudios internos cuando sean plantaciones de menos de 500 ha, sin embargo ya que no existen criterios específicos se podrían generar incumplimientos cuando la discrecionalidad de los auditores aprobados por la RSPO sea utilizada durante la auditoría. También debe aclararse qué sucede cuando no se cumple con los requisitos durante y después del procedimiento, qué procesos retroactivos se darían. En el caso que no se cumplan la remediación y compensación cuáles serán las acciones que RSPO tomará. Existen otros temas específicos necesarios de

instruments may be EIAs or diagnostic studies, among others, depending on the nature of the project. Subsequently, however, a license for the project must be obtained, which is only valid upon payment, every two years, of a surety bond or insurance. All this is regulated by the Environmental Assessment, Control, and Monitoring Regulation 60-2015. In practice, however, the institution responsible for regulating environmental issues lacks both the funds and the human resources to ensure the appropriate and timely processing of the environmental instruments required by law, and this often leads to administrative delays. As a result, where step 3.1 is concerned, we consider it necessary to specify at the national

definir a nivel nacional, para lo cual se espera que exista apoyo de RSPO. Dentro de los temas más importantes a definir está la estimación de GEI (Paso 3.5), se debe conocer si existirá algún límite permisible así como un factor de comparación actual para palma de aceite. Asimismo, las negociaciones de Consentimiento libre, previo e informado (Paso 2) únicamente se pueden asociar, en los requisitos legales del país, a la evaluación social y el proceso de consulta pública antes de la aprobación de los instrumentos ambientales. Sin embargo, en Guatemala no existen más regulaciones respecto a estos temas. Por lo tanto, es esencial determinar cuáles serán los requisitos que RSPO evaluará para contemplarlo en el estudio, tanto para GEI como para CLPI se esperaría exista una guía o listado sobre el cual trabajar, es decir, que se puedan desarrollar guías específicas a nivel nacional.

level, for the RSPO, at which point the EIA would be in compliance with the requirements of the RSPO certification. Regarding box 1, the guidance on competence of assessors, only two requirements are stipulated for internal assessors, alongside mention of certain requirements for assessments or internal studies in the case of plantations of less than 500 ha, but since there are no specific criteria, instances of non-compliance could arise when the discretionary power of the assessors approved by the RSPO was exercised during the audit. It is also necessary to clarify what happens if the requirements during and after the procedure are not complied with and what retroactive measures could be

		<p>applied. In the absence of remediation and compensation, what measures will be taken by the RSPO? There are other specific topics which need to be specified at the national level, for which support is expected from the RSPO. Among the most important such topics is the GHG assessment (Step 3.5): it is important to know whether there is a permissible limit, as well as a current comparison factor for palm oil. Moreover, according to the legal requirements of the country, negotiations on free, prior and informed consent (Step 2) can only take place through social assessment and public consultation prior to the approval of environmental instruments. In Guatemala, however, regulations on these</p>		
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			issues no longer exist. For this reason, it is essential to determine what requirements RSPO will need to evaluate so that these can be taken into consideration in the study. It is to be hoped that both for GHG and FPIC there will be a guide or a list on which to work, in other words that specific guidelines could be developed at the national level.		
Implementation	general content- we want transition period at least one year!!	English	N/A	Indonesia workshop	Transition period is 6 months.
Implementation	Implementing the procedure is time-consuming and would have immense impacts on companies' operational plans and budgets.	English	N/A	Ghana workshop	Noted.

Implementation	I Absence de mécanisme de contrôle de la mise en œuvre de la NPP ;I Absence des mesures de sanctions pour non-respect de la NPP par un membre I Le document ne fait pas mention des chiffres en termes de coût pour l'achèvement de la NPP	French	I No control mechanism of the implementation of the NPP;I No sanctions measures or penalties for non-compliance with the NPP by a member;I The document makes no mention of figures in terms of costs for the completion of the NPP.	Gabon workshop	Noted. This is being addressed
Implementation	Suggest to have the new NPP implemented after guideline documents mentioned in the new NPP are finalised, for example: FPIC guideline, RSPO complaint procedure, guideline for GHG calculation for new planting.	English	N/A	Musim Mas	Transition period is 6 months.
Implementation	Technical – and the integration to regulation especially peatland ecosystem	English	N/A	Indonesia workshop	Not understood
Implementation	There should be a transition of one year from the BoG approval for growers to apply the enhanced NPP	English	N/A	Sinar Mas	Transition period is 6 months.
Implementation	There should be a transition of one year from the BoG approval for growers to apply the enhanced NPP.	English	N/A	GAR	Transition period is 6 months.
Implementation	Under new reg peatland already being implement. National legal process	English	N/A	Indonesia workshop	Not understood

Implementation	Due to newly introduced requirements, we suggest for a pilot implementation of new NPP to test its effectiveness/practicality. E.g. examples of such requirements include definition of competent assessors.	English	N/A	Malaysia workshop	Transition period is 6 months. No pilots are required
Implementation	Feasibility of implementation [will depend] on the clarity of the wordings in the document.	English	N/A	Malaysia workshop	Noted
Internal consistency	Some inconsistency in document. Ex : section 2 step 2 seem to imply FPIC started, on section 5 the CB need to verify that FPIC completed.	English	N/A	Indonesia workshop	Noted
Internal consistency	There're some inconsistencies in document. Example : Section 2 step 2 seems to imply that FPIC started. In section 5, the CB need to verify that whether FPIC has been completed.	English	N/A	Inti Indosawit Subur	Noted
Positive overall	Clear well-structured document. Clarity of marked text changes of different types is a good way to present a consultation text.	English	N/A	WWF	Noted
Positive overall	Easy to use and read.	English	N/A	HSBC	Noted
Positive overall	El documento tiene una estructura adecuada y su lectura es amigable	Spanish	The document is well structured and easy to read.	Solidaridad	Noted
Positive overall	Secara umum OK	Bahasa	In general OK	Indonesia workshop	Noted

Positive overall	Thank you for template report in Annex 1 make us clear	English	N/A	Thai stakeholders	Noted
Positive overall	The new NPP draft importantly unifies various loose documents and instructions previously used. It addresses some of the key concerns, but the new procedure needs to be tightened up in some very important areas	English	N/A	Aidenvironment	Noted
Positive overall	This document is practical and easy to understand. Other RSPO documents should in the future follow this flow in particular this feedback form	English	N/A	Hutan	Noted
Positive overall	Very thorough revision of the NPP requirements generally. Moreover, apart from a well –documented set of rules, its effectiveness will largely depend on implementation, verification, enforcement and corrective action taken against non-compliance	English	N/A	Oxfam	Noted

Requirements, process, parameters or criteria	<p>“If an RSPO member does not comply with the NPP requirements for a new development after January 1st 2010, the member must immediately enter the RSPO Remediation and Compensation Procedure, in order to determine whether the unit can still be certified”: Does the grower (RSPO Member) can clear land without NPP and then put under Compensation.</p>	English	N/A	Malaysia workshop	<p>Looking at the comments, we have realised that this statement “If an RSPO member does not comply with the NPP requirements for a new development after January 1st 2010, the member must immediately enter the RSPO Remediation and Compensation Procedure, in order to determine whether the unit can still be certified” is extremely problematic. Therefore, it has been removed. NPP is bigger than HCV which makes the Compensation Mechanism ill equipped to be the sanction for non-compliance or non-submission of NPP.</p>
Requirements, process, parameters or criteria	<ul style="list-style-type: none"> • Tindakan apa atau perlakuan apa yang dilakukan jika terdapat area New Development yang telah terbuka oleh grower (misalnya pembibitan, akses jalan awal), namun bukan sebagai Primary Forest atau HCV? 	Bahasa	<ul style="list-style-type: none"> • What actions are to take if land clearing has been carried out by grower (e.g. nursery, initial road access) on a New Development area that previously was not a primary forest or HCV area? 	Indonesia workshop	Noted. This is being addressed

Requirements, process, parameters or criteria	Belum detail mengenai, entitas yang berhak melakukan NPP. apakah kelembagaan, atau juga dibebankan pada anggota perorangan?	Bahasa	Not yet provided in detail: who are entitled to carrying out NPP, entities or also individual members?	Setara Jambi	This is now clarified in the document
Requirements, process, parameters or criteria	CB field visits should be obligatory. Most importantly, explicit guidance must direct the CB to identify potential non-compliance when reviewing draft NPPs. CB reviews/NPP reports must highlight real risks of non-compliance, and not merely seek to affirm that “all is fine and well” when it rarely is. Such risk assessment would make the NPP more relevant for growers, who have to pay for the NPP process, as well as other stakeholders	English	N/A	Aidenvironment	Noted, see section on Verification

<p>Requirements, process, parameters or criteria</p>	<p>Dalam NPP ini tidak ada scope penggunaan document. 1. Jika group tersertifikat RSPO, lalu ingin Bangun kebun,namun tidak ingin didaftarkan ke RSPO, apakah harus NPP?2. Jika petani adalah anggota dari group yang bersertifikat RSPO, lalu mau Bangun kebun baru, apakah harus ikut NPP? 3. Jika lahannya dalam satu bentangan, dengan yang telah ebersertifikat RSPO,apakah harus NPP?4. Batasan untuk 500 Ha itu secara pribadi atau kelompok?</p>	<p>Bahasa</p>	<p>This NPP rules no scope of document use. 1. If an RSPO-certified group is to develop a plantation but not for registration under RSPO, should it follow NPP? 2. If a member farmer under an RSPO-certified group wishes to develop a new plantation, should the farmer follow NPP? 3. If the land is on the same plot as those that are RSPO-certified, should it follow NPP? 4. Does the limit of 500 hectares apply to individual or group?</p>	<p>Setara Jambi</p>	<p>All RSPO members must comply to section 4.2.4 of the RSPO Certification System (2007). If the case where a group manager handles several smallholder groups, of which only 2 groups are RSPO certified and the rest aren't and have no intention of doing so, the "non-certified" smallholder groups need not follow NPP as the group manager has no management control over them and has no ownership over the farms. However, the certified groups will be subjected to NPP if expansion occursIf a member farmer under an RSPO-certified group wishes to develop a new plantation, the farmer has to comply with NPP. A RSPO-certified group can only be made up of certified individualsIn the case of smallholders, the limit of 500 hectares apply to the group</p>
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Requirements, process, parameters or criteria	Establish the minimum of hectares which required NPP, even more taking in to account that smallholders expand in one or two hectares.	English	N/A	NES Naturaleza	NPP is required for all cases of new oil palm plantings from 1 Jan. 2010 regardless of size (ha)
Requirements, process, parameters or criteria	For the implementation of this document to be in line with Annex 1: 1.3 which is only applicable as of 1st Jan 2017. Suggest that the implementation of this new NPP will be on trial from date of endorsement until 1 Jan 2017.	English	N/A	Genting Plantations	Carbon assessment and GHG calculation are required for NPPs submitted from 1 Jan 2015.
Requirements, process, parameters or criteria	Indicator list for no-go areas in relation to the outcomes of the various assessment (e.g. GHG assessment procedure).	English	N/A	Wetlands International	Areas to be avoided are HCVA's, Primary forest, high carbon stock areas and peat.
Requirements, process, parameters or criteria	It should be clearly stated that for new plantings of less than 500 hectares there is no need for a licensed consultant leader on HCV and internal assessment are accepted.	English	N/A	NES Naturaleza	ALS licensed assessor is required for all cases where NPP is submitted - regardless of area (i.e. even for plantings of less than 500 ha)
Requirements, process, parameters or criteria	More focus on the decision related to go and no-go areas before new development starts, based on the outcomes of the required assessments	English	N/A	Wetlands International	Areas to be avoided are HCVA's, Primary forest, high carbon stock areas and peat.

Requirements, process, parameters or criteria	Periode complain 30 hari masih membuka peluang masuknya complain terhadap komponen NPP, usulannya jika setelah periode 30 hari public konsultasi, complain terhadap komponen NPP tidak dibuka lagi. RSPO memberikan statement of clearance	Bahasa	The 30-day complaint period still allows complaints of NPP components. It is suggested that once the 30-day period of public consultation ends, complaints should no longer be allowed on NPP components and RSPO should issue a statement of clearance.	Indonesia workshop	RSPO Secretariat will issue an email to the CB and company on the first working day after 30 day notification period ends , or once any comments raised are resolved. The email will state that the NPP process has been completed. The company can start the development after all legal requirements has been met.
Requirements, process, parameters or criteria	Post NPP, CBs are bound to verify NPP implementation compliance when reviewing of TBPs and RSPO's Partial Certification Requirements (RSPO CS 2007/2011). The NPP document must make this explicit and must force CBs to conduct random but focused checks on post NPP implementation when assessments and surveillances are conducted for other estates owned by the group	English	N/A	Aidenvironment	The CB will check the area and its compliance with RSPO requirement at the initial audit.

Requirements, process, parameters or criteria	<p>The NPP excludes plantings on new land that was already under oil palm (oil palm to oil palm) under a different land owner. It is not incorporated under the definition of 'replanting'. However, we think that such expansion of the concession area of a company should be considered in all assessments that are required for 'new plantings' (e.g. the GHG assessment procedure and drainability assessment).</p> <p>We believe that 'drainability assessment for peatlands' should be mentioned separately in the list SEIA, HCV assessment, soil suitability and topographic survey, LUC, carbon and GHG assessments.</p>	English	N/A	Wetlands International	Oil palm to oil palm planting does not require NPP. For abandoned plantations older than 3 years - an NPP is required.
Scope	Does RSPO have policy/guidelines of how many land (Globally) to be developed in the future as to set targets on how much product that RSPO can accept and sell at premium price to fulfil the market demand? If the above apply, RSPO will have to be more strict on NPP to control the supply	English	N/A	Sabah Terrestrial Conservation Programme	N/A

Scope and focus	2. Se debe documentar con ejemplos relacionada a los diferentes contextos, no mencionan ejemplos relacionados al contexto de Latinoamérica.	Spanish	Examples from different contexts should be described: no examples relating to the Latin American context are provided.	Jaremar	Examples or specific case studies is not provided in NPP
Scope and focus	Access to capital in Africa is harder than anywhere else in the world (e.g., Malaysia and Indonesia are subsidised) so there's a good possibility that projects could be killed off by the pace of the NPP process. How can this be acknowledged and managed in the revised NPP process?	English	N/A	Ghana workshop	The aim of NPP is to ensure responsible development that is free from conflict. NPP is also to act as a safeguard that the plantation can be certifiable in future.
Scope and focus	Communities and governments have a strong say, and challenges of dealing with their concerns should be thoroughly considered in the new procedures.	English	N/A	Ghana workshop	Government and communities are important stakeholders in NPP process. Assessments done should include communities and follow the law.
Scope and focus	Ruang lingkup NPP dipandang berat karena menambah kajian dan output (CSA & SKT) yang harus dilakukan.	Bahasa	The scope of New Planting Procedure (NPP) is considered difficult to carry out as it makes additions to the mandatory assessment and output, i.e. Carbon Stock Assessment (CSA) and High Carbon Stock (HCS).	Indonesia workshop	Noted. But this is needed to reflect the revisions in P&C 2013

Smallholders	“If a company leads the certification process for scheme smallholders, then the company is also responsible for ensuring the NPP is complied with and for submitting the NPP notification to the RSPO Secretariat”: For smallholder is the company submit the NPP?	English	N/A	Malaysia workshop	Group manager responsible for the smallholder (be it a company or an organisation) is responsible for ensuring compliance to RSPO requirement, including NPP if it is a new planting/development.
Smallholders	“In the case of Group Certification, the NPP notification documents should be compiled and submitted to the RSPO Secretariat by the Group Manager”: “: For Group Certification is the Group Manager submit the NPP?	English	N/A	Malaysia workshop	Yes
Smallholders	GHG calculation should be reviewed for smallholder.	English	N/A	Thai stakeholders	Currently the same procedure applies. However, we will take this under advisement
Smallholders	NPP for smallholders should be done in Indonesia	English	N/A	Inti Indosawit Subur	Not understood
Smallholders	Petani mandiri, terutama petani kecil, sangat sulit mengimplementasikan hal ini, dikarenakan keterbatasan sumber daya, informasi, dan Pengetahuan serta dukungan dari pihak eksternal.	Bahasa	It is difficult for independent smallholders, particularly small farmers, to implement this because of their limited resources, information, knowledge and external support.	Setara Jambi	NPP is obligatory for any land development / plantings by RSPO member.

Smallholders	Simplified NPP version with less strict requirements for smallholders. The development of the smallholders document should also take into consideration in line with the developments of the other working group (HRWG, BHCV WG/CTF, ERWG & etc)	English	N/A	Malaysia workshop	RSPO is developing HCV guidance for smallholders.
Smallholders	Simplified NPP version with less strict requirements for smallholders. The development of the smallholders document should also take into consideration in line with the developments of the other working group (HRWG, BHCV WG/CTF, ERWG & etc)+ Group Certification draft document	English	N/A	Genting Plantations	RSPO is developing HCV guidance for smallholders.
Smallholders	There is no clarity for NPP procedure for smallholders and group certification. This needs to be included in this document.	English	N/A	NES Naturaleza	Noted. A guidance for smallholders will be developed

Technical detail	“If land clearing is actively occurring at the time of purchase, operations must be stopped and the NPP requirements (as per the current document) complied with for the area that has not yet been converted”: Is the NPP will be applicable for the area not yet converted or includes area converted and put under compensation?	English	N/A	Malaysia workshop	NPP is required for land that is not yet developed.
Technical detail	“If the grower engages towards RSPO certification” (Page 7) – RSPO certification of the newly planted area or existing area?	English	N/A	Malaysia workshop	RSPO certification is normally for areas already planted
Technical detail	Agregar una sección donde se explica la relación del documento con otros de RSPO (GC, R&C y si los reemplaza, complementa, etc.)	Spanish	Add a section explaining the links between this and other RSPO documents (GC, R&C and if it replaces them, supplements them, etc.)	Colombia workshop	List of supporting documents is provided in the annex
Technical detail	At the point of certification” – Is this the certification of the newly planted area? Is this have any effect to the partial certification once the company engaged in compensation process?	English	N/A	Malaysia workshop	Due to the amendments made to the document, this comment is no longer applicable

Technical detail	CBs' NPP review must be explicitly included in the Terms of Reference of ASI's RSPO accreditation program. There must be rules what happens to NPPs that are 'orphanaged' should a CB be de-accredited	English	N/A	Aidenvironment	ASI will be checking the CB's system/procedures for NPP as well as sampling of its activities.
Technical detail	La sección 1 (1.1) no resuelve la pregunta que plantea, es más una explicación de antecedentes	Spanish	Section 1 (1.1) does not answer the question posed; it is more an explanation of previous ones.	Colombia workshop	Not understood
Technical detail	The concept of on going plantations is very important because the period for planting could be delayed for external reasons such as climate, political instability, financing and so on. So instead of eliminating the concept should be limited for an update in case of delay.	English	N/A	NES Naturaleza	The NPP can be submitted by the company at any moment after they have obtained legal permit for the development/planting. It should also be clarified that the concept of on-going planting in NPP is only for plantings that straddle the RSPO implementation date of 1st Jan 2010.
Technical detail	Timeframe over which remediation and compensation procedure should be conducted has not been specified.	English	N/A	Ghana workshop	N/A. This will be stated in the Remediation and Compensation Procedure, not the NPP.
Technical detail	What does it means "Completed" (Page 8 top)?	English	N/A	Malaysia workshop	Completed means that all process prescribed by NPP process have been complied with.

Translation	Apakah NPP untuk petani dapat dilakukan dalam bahasa Indonesia	Bahasa	Can NPP for smallholders be conducted in Indonesian?	Indonesia workshop	Yes
Translation	Bahasa Malaysia translation needed for Malaysian smallholders.	English	N/A	Genting Plantations	Noted
Translation	Bahasa Malaysia translation needed for Malaysian smallholders.	English	N/A	Malaysia workshop	Noted
Translation	Good translation from English to Thai (more understand)	English	N/A	Thai stakeholders	Noted
Translation	Indonesian translation is not clear	English	N/A	Indonesia workshop	Noted. This will be addressed
Translation	Some words not clear (when translated in to Thai Language)	English	N/A	Thai stakeholders	Noted. This will be addressed
Translation	There must be a proper Indonesian translation for the enhanced NPP.	English	N/A	GAR	Noted. This will be addressed
	new development definition	English	N/A	Indonesia workshop	In glossary: Planned or proposed planting on land not previously cultivated with oil palm.

Glossary

General comments

Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Add a definition	High carbon stock (HCS) definition should be included.	English	N/A	Malaysia workshop	Not addressed now. Even when RSPO provides a definition, the most appropriate place to have it would be in the RSPO GHG assessment procedure for new plantings or in NI documents rather than NPP
Add something	Addition : RSPO need to develop 'master glossary' for all technical glossary and should be published on website. This is to avoid different definition stated in difference guidance e.g. NPP, RSPO P&Cs, etc.	English	N/A	Inti Indosawit Subur	Not addressed now but will be followed up by the Secretariat
Add something	Addition : RSPO need to develop 'master glossary' for all technical glossary, publish on website	English	N/A	Indonesia workshop	Not addressed now but will be followed up by the Secretariat
Add something	Belum terdapat batasan yang jelas untuk istilah yang digunakan dalam dokumen ini: 1. Pendapat 2. Komentar 3. Keluhan	Bahasa	There is no clear boundary for the terms used in this document: 1. Opinion 2. Comment 3. Complaint	Indonesia workshop	Noted and incorporated

Add something	Harus ditambahkan definisi kapan NPP tersebut komplit	Bahasa	Definition should be added on when NPP is considered completed.	Indonesia workshop	Noted and incorporated
Add something	High Carbon Stock (HCS) should be included	English	N/A	Thai stakeholders	The new NPP document does include the requirements of Criterion 7.8
Add something	It would be helpful to have a reference / link to each glossary and definition	English	N/A	Sinar Mas	Not addressed now but will be followed up by the Secretariat
Add something	Tambahkan definisi dan ruang lingkup serta aturan mengenai keluhan. Harus jelas siapa complainantnya dan bagaimana aturannya. Ada proses verifikasi, complain atau keluhan yang terbukti tidak beralasan harus segera ditutup dan ada sanksi bagi complain yang tidak beralasan. contoh jika sudah 2 kali berturut-turut tidak valid maka hak complain dicabut. Karena cukup sering terjadi complain yang tidak benar.	Bahasa	Add complaint definition, scope and rules. The complainant and rules should be clear. There will be a verification process where complaints proved to be invalid should be immediately closed and sanctions will be made upon such complaints. For instance, any party who has submitted invalid complaints two times in a row should no longer have the rights to complaint. This is because unsupported complaints have often taken place.	Indonesia workshop	Noted and more elaboration given to the NPP comments mechanism
External consistency	Should provide link to cross reference with other RSPO relevant document, example : RSPO FPIC guidance (which version).	English	N/A	Inti Indosawit Subur	List of supporting documents is provided in annex 4

External consistency	Check compliancy in terminology between GHG assessment procedures document and the NPP. E.g. 'greenhouse gas assessment' and/or 'carbon assessment'.	English	N/A	Wetlands International	Noted and incorporated
External consistency	Need to add link for technical RSPO documents or guidance or definition for each item if existing	English	N/A	Indonesia workshop	List of supporting documents is provided in annex
External consistency	There are no clear definition / differentiation of terminology used in the documents between comments and complaints. Should company act upon comment or complaint during NPP?	English	N/A	Inti Indosawit Subur	Noted and incorporated
External consistency	There should be a standard glossary and definition list in all RSPO documents and publish on its documents and website	English	N/A	Sinar Mas	Not addressed now but will be followed up by the Secretariat
External consistency	There should be a standard glossary and definition list in all RSPO documents and publish on its documents and website.	English	N/A	GAR	Not addressed now but will be followed up by the Secretariat

Internal consistency	Algunos de los términos en el glosario pueden depender de la definición en otros documentos (como certificación en grupo), es importante mantener la misma definición en todos los documentos de RSPO y actualizarlos si es preciso debido al proceso de revisión de estos otros documentos (cuya relación debería ser incluida en este documento)	Spanish	The definitions of some of the terms in the glossary may depend on the definition of terms in other documents (such as group certification), it is important to keep the same definition in all RSPO documents and to update them if necessary, as required for the revision of these other documents (links with which should be included in this document)	Colombia workshop	Not addressed now but will be followed up by the Secretariat
More specific definitions	define specific terms used in the document e.g. SEIA, HCV, AMDAL, IUP etc	English	N/A	Genting Plantations	The meaning of all acronyms used are provided for. Elaborate definitions for SEIA, HCV, AMDAL and IUP are not given.
More specific definitions	Following definitions need to be included: major producer oil palm, secondary forest, gross emissions and carbon sinks.	English	N/A	NES Naturaleza	It was decided that these definitions are not necessary for the NPP document
More specific definitions	Most of definitions are very general, they need to be more specific and with better explanation	English	N/A	NES Naturaleza	The Secretariat has tried to address this.
More specific definitions	To define specific terms used in the document e.g. SEIA, HCV, AMDAL, IUP etc.	English	N/A	Malaysia workshop	The meaning of all acronyms used are provided for. Elaborate definitions for SEIA, HCV, AMDAL and IUP are not given.
Positive overall	cukupjelas	Bahasa	Already clear	Setara Jambi	noted

Translation	In Bahasa version, translation is not clear, For example: page 4. Associated development = Pengembangan terasosiasi? Better use the common English terminology to avoid confusion. The same applies for acronyms. For example: Page 6 English version & Page 7 Bahasa version. High Carbon Stock (HCS) vs Stok Karbon Tinggi (SKT). SKT in Bahasa can be mistaken with Surat Keterangan Tanah.	English	N/A	Inti Indosawit Subur	Noted. It was decided that translated acronyms will be used as it is the norm.
Translation	The Indonesian translation needs to be clear in the glossary and definitions	English	N/A	Sinar Mas	Noted. This will be addressed
Translation	The Indonesian translation needs to be explicit and clear in the glossary and definitions.	English	N/A	GAR	Noted. This will be addressed
Translation	Translasi dalam bahasa Indonesia kurang tepat.	Bahasa	Not appropriately translated to Indonesian	Indonesia workshop	Noted. This will be addressed

Comments on individual glossary entries

Glossary entry	Comments received	Language	English translation	Source of comment	RSPO input
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<p>Associated development</p>	<p>It should include plasma/smallholder development It should explicitly refer to all land preparation measures with environmental impact, including 'imas tumbang' (selective brush clearing prior to logging) whether commissioned by the NPP applicant directly or occurring on behalf of a third party. The essence is: any activity on the ground that facilitates plantation development and that has environmental impact. This can include activities that are not directly organized by the company (e.g. when contractors and community members commence land clearing without orders or approvals by the lease holder).</p>	<p>English</p>	<p>N/A</p>	<p>Aidenvironment</p>	<p>This is the definition in the glossary: includes establishing mills, kernel crushers, nurseries, housing/camps and offices, roads/tracks, permanent boundary marking, drainage, effluent treatment plants, fruit collection centres, terracing, earthworks, scheme smallholdings/outgrower plots and any other development relevant to the operations of the new oil palm development, whether carried out by the grower or any other party.</p>
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Associated development	It could be a misunderstanding with vertical integration. It is not clear if such associated development could be a partnership with external allies or if it is within the same economic group.	English	N/A	NES Naturaleza	This is the definition in the glossary: includes establishing mills, kernel crushers, nurseries, housing/camps and offices, roads/tracks, permanent boundary marking, drainage, effluent treatment plants, fruit collection centres, terracing, earthworks, scheme smallholdings/outgrower plots and any other development relevant to the operations of the new oil palm development, whether carried out by the grower or any other party.
Associated development	includes establishing mills, kernel crushers, nurseries, housing and offices, roads, boundary marking, terracing, earthworks and any other development relevant to the operations of the new oil palm development. (to insert note that this only applies to oil palm plantation only)	English	N/A	Genting Plantations	Associated should already refer to the oil palm development. However this can be accepted to clarify the definition.

Associated development	Includes establishing mills, kernel crushers, nurseries, housing and offices, roads, boundary marking, terracing, earthworks and any other development relevant to the operations. (to insert note that this only applies to oil palm plantation only)	English	N/A	Malaysia workshop	This is the definition in the glossary: includes establishing mills, kernel crushers, nurseries, housing/camps and offices, roads/tracks, permanent boundary marking, drainage, effluent treatment plants, fruit collection centres, terracing, earthworks, scheme smallholdings/outgrower plots and any other development relevant to the operations of the new oil palm development, whether carried out by the grower or any other party.
Associated development	To remove the word “any other development” and replaced by “any other activities/ facilities” relevant to the development	English	N/A	Malaysia workshop	This is the definition in the glossary: includes establishing mills, kernel crushers, nurseries, housing/camps and offices, roads/tracks, permanent boundary marking, drainage, effluent treatment plants, fruit collection centres, terracing, earthworks, scheme smallholdings/outgrower plots and any other development relevant to the operations of the new oil palm development, whether carried out by the grower or any other party.

Associated development	Incluye el establecimiento de plantas extractoras, plantas de tratamiento de efluentes, trituradoras de palmiste, viveros, viviendas y oficinas, carreteras, canales de drenajes, distancia proximal de las lagunas de tratamiento de efluentes a los ríos y lagos y humedales, demarcación de límites, terrazas, movimientos de tierra, centros de acopio de fruta, sistema de transporte de fruta desde el campo, y cualquier otro desarrollo relevante para las operaciones.	Spanish	This includes the establishment of mills, effluent treatment plants, kernel crushers, nurseries, housing and offices, roads, drainage channels, proximal distance from effluent treatment ponds to rivers, lakes and wetlands, boundary marking, terracing, earthworks, fruit collection centres, systems for transporting fruit from the field, and any other development relevant to the operation.	Solidaridad	This is the definition in the glossary: includes establishing mills, kernel crushers, nurseries, housing/camps and offices, roads/tracks, permanent boundary marking, drainage, effluent treatment plants, fruit collection centres, terracing, earthworks, scheme smallholdings/outgrower plots and any other development relevant to the operations of the new oil palm development, whether carried out by the grower or any other party.
Associated development	Eliminar el término “Trituradora de Palmiste”, y mencionar Planta Extractora de aceite crudo de palma y de aceite de palmiste.	Spanish	Remove the term "kernel crushers" and refer instead to mills for crude palm oil and palm kernel oil.	Colombia workshop	This is the definition in the glossary: includes establishing mills, kernel crushers, nurseries, housing/camps and offices, roads/tracks, permanent boundary marking, drainage, effluent treatment plants, fruit collection centres, terracing, earthworks, scheme smallholdings/outgrower plots and any other development relevant to the operations of the new oil palm development, whether carried out by the grower or any other party.

Associated development	Cambiar el término “carreteras” por “vías internas privadas”	Spanish	Replace the term "roads" with “private internal routes”	Colombia workshop	This is the definition in the glossary: includes establishing mills, kernel crushers, nurseries, housing/camps and offices, roads/tracks, permanent boundary marking, drainage, effluent treatment plants, fruit collection centres, terracing, earthworks, scheme smallholdings/outgrower plots and any other development relevant to the operations of the new oil palm development, whether carried out by the grower or any other party.
Associated development	Cambiar el término “viviendas” por “viviendas internas o campamentos”.	Spanish	Replace the term "housing" with "internal dwellings or camps".	Colombia workshop	This is the definition in the glossary: includes establishing mills, kernel crushers, nurseries, housing/camps and offices, roads/tracks, permanent boundary marking, drainage, effluent treatment plants, fruit collection centres, terracing, earthworks, scheme smallholdings/outgrower plots and any other development relevant to the operations of the new oil palm development, whether carried out by the grower or any other party.

Associated development	Incluye el establecimiento de plantas de beneficio, trituradoras de palmiste, viveros, viviendas y oficinas, carreteras, demarcación de límites, terrazas, movimientos de tierra y cualquier otro desarrollo relevante para las operaciones	Spanish	Include the establishment of processing plants, kernel crushers, nurseries, housing and offices, roads, boundary marking, terracing, earthworks and other developments relevant to the operation.	Grepalma	This is the definition in the glossary: includes establishing mills, kernel crushers, nurseries, housing/camps and offices, roads/tracks, permanent boundary marking, drainage, effluent treatment plants, fruit collection centres, terracing, earthworks, scheme smallholdings/outgrower plots and any other development relevant to the operations of the new oil palm development, whether carried out by the grower or any other party.
Associated development	We suggest not to translate “associated development” to Bahasa since the word “pengembangan terasosiasi” is not suitable..	English	N/A	Inti Indosawit Subur	Associated Development will be translated as "Pengembangan operasional terkait"
Associated development	Diusulkan terjemahan dari associated development sebagai “pengembangan operasional terkait”, daripada pengembangan terasosiasi.	Bahasa	It is suggested that ‘associated development’ is translated into Indonesian as ‘pengembangan operasional terkait’ instead of ‘pengembangan terasosiasi’.	Indonesia workshop	Associated Development will be translated as "Pengembangan operasional terkait"
Carbon Stock	Definition and methodology of carbon stock assessment needs to be further elaborated and widely accepted.	English	N/A	Genting Plantations	References are already made to the RSPO GHG Assessment Procedure for New Plantings. The entire procedure cannot be outlined in the NPP.

Carbon Stock	Definition and methodology of carbon stock assessment needs to be further elaborated and widely accepted.	English	N/A	Malaysia workshop	References are already made to the RSPO GHG Assessment Procedure for New Plantings. The entire procedure cannot be outlined in the NPP.
Carbon Stock Assessment	Definition and methodology of carbon stock assessment needs to be further elaborated and widely accepted	English	N/A	Genting Plantations	References are already made to the RSPO GHG Assessment Procedure for New Plantings. The entire procedure cannot be outlined in the NPP.
Carbon Stock Assessment	Definition and methodology of carbon stock assessment needs to be further elaborated and widely accepted	English	N/A	Malaysia workshop	References are already made to the RSPO GHG Assessment Procedure for New Plantings. The entire procedure cannot be outlined in the NPP.
Carbon Stock Assessment	La medición de las reservas de carbono en la nueva área propuesta para su plantación, por medio de los métodos básicos recomendados que se ofrecen en el Procedimiento de la RSPO de Evaluación de GEI para Nuevas Plantaciones. Sólo se consideran las reservas de carbono en la biomasa por encima y por debajo del suelo y la materia orgánica del suelo en suelos de turba y suelos normales (no turba).	Spanish	Measuring carbon stock in the proposed new planting area following the recommended basic methods provided in the RSPO GHG Assessment Procedure for New Planting. Only carbon stocks in the above and below ground biomass and soil organic matter in soil and peat soil and normal (non peat) soil are considered.	Solidaridad	Please note that the soil carbon of mineral soils is not considered in the current RSPO GHG Assessment Procedure for New Plantings

Carbon Stock Assessment	It is not clear whether the analysis should be done on peat soils or in all kind of soils. The definition should be improved to avoid misunderstanding between above ground carbon and below ground carbon.	English	N/A	NES Naturaleza	Please note that the soil carbon of mineral soils is not considered in the current RSPO GHG Assessment Procedure for New Plantings
Carbon Stock Assessment	Only peat soil. How about other soil?	English	N/A	Malaysia workshop	Please note that the soil carbon of mineral soils is not considered in the current RSPO GHG Assessment Procedure for New Plantings
Carbon Stock Assessment	The sentence only carbon stock in the above and below ground...’ need further explanation for user – “For the peat soil ONLY...”	English	N/A	Malaysia workshop	Please note that the soil carbon of mineral soils is not considered in the current RSPO GHG Assessment Procedure for New Plantings
Carbon Stock Assessment	Limits for carbón stalk and crop sequestratio.	English	N/A	TOPP	No threshold is currently provided
Conversion	This shall include selective logging and ‘imas tumbang’. See also land preparation.	English	N/A	Aidenvironment	In the NPP context, conversion refers to the process of clearing or degrading any non-oil palm land cover to be planted with oil palm.
Conversion	Proceso por el que los bosques u otra vegetación natural son reemplazados o perturbados por otros usos del suelo.	Spanish	Process where forests or other natural vegetation are replaced or disturbed by other land uses.	Solidaridad	In the NPP context, conversion refers to the process of clearing or degrading any non-oil palm land cover to be planted with oil palm.
Conversion	Shall include replacement of one land use to another, not only replacement of forests/natural vegetation.	English	N/A	Malaysia workshop	In the NPP context, conversion refers to the process of clearing or degrading any non-oil palm land cover to be planted with oil palm.

Conversion	Forest: more specific meaning of Forest. (i.e. primary, secondary, degraded etc.)	English	N/A	Malaysia workshop	In the NPP context, conversion refers to the process of clearing or degrading any non-oil palm land cover to be planted with oil palm.
Conversion	Other land uses: specific other land uses.	English	N/A	Malaysia workshop	In the NPP context, conversion refers to the process of clearing or degrading any non-oil palm land cover to be planted with oil palm.
Conversion	<p>Process where forests or other natural vegetation are replaced by other land uses.</p> <p>The definition should also include semi-natural vegetation since there is very little if no 'natural vegetation' remaining that has not been impacted to a degree by human activity and such habitat can still retain values.</p>	English	N/A	WWF	In the NPP context, conversion refers to the process of clearing or degrading any non-oil palm land cover to be planted with oil palm.
Fragile soils	The definition is incorrect in agronomic terms. To expand this definition for clarity. Or standardise as in the national interpretations or P&C	English	N/A	Genting Plantations	It may not be correct in agronomic terms but it is the common understanding of what fragile soils encompasses in the RSPO context. It is also in RSPO P&C
Fragile soils	The definition is incorrect in agronomic terms. To expand this definition for clarity. Or standardise as in the national interpretations or P&C	English	N/A	Malaysia workshop	It may not be correct in agronomic terms but it is the common understanding of what fragile soils encompasses in the RSPO context. It is also in RSPO P&C

Fragile soils	Debería incluir suelos con aguas termales o altos residuos de carbono y además las riberas de los ríos en los metros que establece la ley nacional como franja de protección.	Spanish	Soil containing thermal water or high levels of carbon residue and also riverbanks within the distance established under national law as a buffer zone.	Solidaridad	N/A. Must be consistent with P&C
Fragile soils	Please also add reference to definition of each country's National Interpretation of RSPO P&C.	English	N/A	Inti Indosawit Subur	NPP is a generic document. Companies can still refer to related definitions in their respective National Interpretations
Fragile soils	ditambahkan mengacu kepada National Interpretation P and C	Bahasa	add 'refer to National Interpretation of P and C'.	Indonesia workshop	NPP is a generic document. Companies can still refer to related definitions in their respective National Interpretations
Free, Prior and Informed Consent (FPIC)	The procedure needs to state that „FPIC has started (not completed) “ is one of considerations that the NPP is completed and the grower may proceed the LC.	English	N/A	First Resources	Noted and incorporated with reference to the FPIC guidance document
Free, Prior and Informed Consent (FPIC)	In Bahasa version: 1. We suggest to change the definition to “FPIC adalah negosiasi yang dilakukan atas dasar Keputusan yang dilakukan atas dasar informasi yang memadai dan utuh serta tanpa paksaan...” This aligns with the current definition in the National Interpretation Bahasa version. 2. In the acronym , change the “Persetujuan” to “Keputusan”	English	N/A	Inti Indosawit Subur	1. AGREE, to add the phrase to the definition 2. In the NI FPIC is translated as Keputusan Bebas Didahulukan dan Diinformasikan. Therefore with the reference to the NI the word "persetujuan" should be change to "Keputusan"

Free, Prior and Informed Consent (FPIC)	Diusulkan menngganti kata persetujuan menjadi keputusan. Hal tersebut sesuai dengan National Interpretation yang menggunakan term KBBD.	Bahasa	It is suggested to replace 'persetujuan' or 'agreement' with 'keputusan' or 'decision'. This is more in line with the National Interpretation which uses the term 'Keputusan Bebas, Didahulukan dan Diinformasikan' (KBDD) as FPIC.	Indonesia workshop	1. AGREE, to add the phrase to the definition2. In the NI FPIC is translated as Keputusan Bebas Didahulukan dan Diinformasikan. Therefore with the reference to the NI the word "persetujuan" should be change to "Keputusan"
Free, Prior and Informed Consent (FPIC)	Dalam artinya: Ditambahkan... informasi yang memadai dan utuh serta tanpa paksaan...	Bahasa	In the definition: Add.....information that is adequate, intact and without coercion....	Indonesia workshop	1. AGREE, to add the phrase to the definition 2. In the NI FPIC is translated as Keputusan Bebas Didahulukan dan Diinformasikan. Therefore with the reference to the NI the word "persetujuan" should be change to "Keputusan"
Groundtruth					
Independent (in relation to assessments)	Objective and free from bias and actual or perceived vested interest.	English	N/A	Aidenvironment	Independent (in relation to assessments) - Objective and free from conflict of interest or perceived vested interest. Always undertaken by a third party.
Independent (in relation to assessments)	Objective and free from bias. Generally undertaken by a third party. (Suggest to use 'no conflict of interest' instead of bias)	English	N/A	Genting Plantations	Independent (in relation to assessments) - Objective and free from conflict of interest or perceived vested interest. Always undertaken by a third party.

Independent (in relation to assessments)	Objective and free from bias. Generally undertaken by a third party. (Suggest to use 'no conflict of interest' instead of bias)	English	N/A	Malaysia workshop	Independent (in relation to assessments) - Objective and free from conflict of interest or perceived vested interest. Always undertaken by a third party.
Independent (in relation to assessments)	In Bahasa version, please change "bebas prasangka" to "bebas kepentingan".	English	N/A	Inti Indosawit Subur	Noted. This will be addressed.
Independent (in relation to assessments)	Independent – any time frame to avoid conflict to of interest.	English	N/A	Malaysia workshop	According to Certification System Document (2007), Members of assessment teams must have maintained independence from the company or family of companies for a minimum of five years to be considered not to have a conflict of interest
Independent (in relation to assessments)	Objective and free from bias. Generally undertaken by a third party. The definition should also include some level of quality assurance - eg: accreditation or at least approval by the RSPO.	English	N/A	WWF	Independent (in relation to assessments) - Objective and free from conflict of interest or perceived vested interest. Always undertaken by a third party.
Independent (in relation to assessments)	Bebas prasangka diubah menjadi bebas kepentingan	Bahasa	'Free of preconception' should be replaced with 'free of interest'.	Indonesia workshop	Noted. This will be addressed.
Land cover	Should be specific to anthropogenic changes of land	English	N/A	Solidaridad	Disagree. This is land cover in the general sense

Land cover stratification	insert additional explanation e.g pictorial form for better explanation	English	N/A	Genting Plantations	Current text is sufficient
Land cover stratification	To insert additional explanation pictorial form for better explanation.	English	N/A	Malaysia workshop	Current text is sufficient
Land cover stratification	Etc. Need to be more specific i.e. old buildings/line site	English	N/A	Malaysia workshop	stratification referring to vegetation categories
Land cover stratification	General field survey and inspection should be possible for smallholders	English	N/A	Thai stakeholders	general field survey could be done to provide more detail information
Land preparation	This shall include selective logging and 'imas tumbang'.	English	N/A	Aidenvironment	This is already covered in the existing definition for land preparation as part of "clearance or degradation of any existing vegetation"
Land preparation	Existing vegetation: more specific vegetation needed	English	N/A	Malaysia workshop	Not necessary
Land Use	Types d'activité effectuée sur une unité de surface correspond plus à une occupation de terre et non une affectation de terre	French	Types of activity being carried out on a unit of land corresponds more to a land cover rather than a land use	Gabon workshop	Landuse definition according to IPCC : The type of activity being carried out on a unit of land. This definition is also used in the NPP document
Land Use	Préciser qu'il est nécessaire de ne pas confondre avec un plan national d'affectation des terres (en cours au Gabon)	French	Specify that it is necessary to avoid confusion with a national land use plan (in progress in Gabon)	Gabon workshop	Landuse definition according to IPCC : The type of activity being carried out on a unit of land. This definition is also used in the NPP document
Land Use	Evolution du couvert végétal VS évolution du cadre légal	French	Change in the vegetation cover vs. change in the legal framework	Gabon workshop	Landuse definition according to IPCC : The type of activity being carried out on a unit of land. This definition is also used in the NPP document

Land Use Change (LUC) Analysis	Propose to delete wording “indirect” from the definition.	English	N/A	Musim Mas	In the process of editing the NPP document after public consultation, Land Use Change (LUC) Analysis is removed
Land Use Change (LUC) Analysis	Mention that this includes using satellite data	English	N/A	Hutan	In the process of editing the NPP document after public consultation, Land Use Change (LUC) Analysis is removed
Land Use Change (LUC) Analysis	Saran:Tidak berlaku mundur ketetapan LUCA bagi New Member RSPO.	Bahasa	Suggestion: LUCA should not be conducted retroactively for new RSPO members (RSPO note: To be viewed with the original BI text).	Indonesia workshop	In the process of editing the NPP document after public consultation, Land Use Change (LUC) Analysis is removed

Land Use Change (LUC) Analysis	<p>NPP should not be required for conversion of existing agricultural use, provided that agricultural use was in existence prior to 1st January 2010, and provided that conversion is in compliance with local statutes.</p> <p>As it stands, the new NPP requirements do not apply if a grower decides to replant his or her old oil palms with a new generation of oil palms.</p> <p>But, if he or she decides to replace their old rubber or coconuts or rice fields with oil palms they will be required by NPP to prepare a full Land Use Change Analysis.</p> <p>RSPO should not be erecting NPP barriers or have any involvement in such lawful conversion of existing agricultural uses.</p> <p>This is a hugely unproductive (and unsustainable) imposition, which cannot be explained rationally.</p>	English	N/A	Univanich	<p>Considering that RSPO encourages conversion of brownfield over greenfield for oil palm development and that Principle 7 still applies to oil palm plantations that are newly established on agricultural land, conversion of land already under active agricultural use/livestock (other than oil palm) as of 1st January 2010 is exempt from the CB verification and the 30 day notification period for comments.</p> <p>Companies are still required to follow the New Plantings Procedure and submit their NPP report to the RSPO Secretariat for online publication. This exemption is not applicable for conversion of land under agroforestry and forest plantations.</p>
Local Peoples' Land	Further clarification and definition needed on 'local', what does local mean. The term 'local' should be explained whether they include native people/transmigrants etc	English	N/A	Genting Plantations	This will be as defined by the RSPO FPIC guidance document

Local Peoples' Land	Further clarification and definition needed on 'local', what does local mean. The term 'local' should be explained whether they include native people/trans migrants etc.	English	N/A	Malaysia workshop	This will be as defined by the RSPO FPIC guidance document
Local Peoples' Land	Local Peoples' Land: Define "Local people" because in certain country people from other state/region/district are not considered as local in another state/region/district.	English	N/A	Malaysia workshop	This will be as defined by the RSPO FPIC guidance document
Local Peoples' Land	This isn't a term I'm familiar with. Reference to "local" is ambiguous.	English	N/A	Credit Suisse	This will be as defined by the RSPO FPIC guidance document
Local Peoples' Land	In Bahasa version, please change "...atas mana masyarakat ..." to "... di mana masyarakat ..."	English	N/A	Inti Indosawit Subur	This will be as defined by the RSPO FPIC guidance document
Local Peoples' Land	Mengganti "atas mana....." menjadi "dimana masyarakat memiliki hak kepemilikan dan penguasaan untuk"	Bahasa	Replace 'on behalf of....' with 'where community has ownership and tenure rights to....'	Indonesia workshop	This will be as defined by the RSPO FPIC guidance document
Marginal soils	Please also add reference to definition of each country's National Interpretation of RSPO P&C.	English	N/A	Inti Indosawit Subur	Reference will be to RSPO P&C 2013
Marginal soils	Ditambahkan mengacu pada NI	Bahasa	Add 'refer to NI'.	Indonesia workshop	Reference will be to RSPO P&C 2013
Net GHG Emissions	Apakah yang dimaksud "rosot"? Kalau memang ada dalam bahasa Inggris sebaiknya ditulis dalam kurung.	Bahasa	What is meant by 'rosot'? If there is an English term for the word, it would be best to write it down in parenthesis.	Indonesia workshop	Noted. This will be addressed, i.e. replace 'rosot karbon' with 'rosot karbon (carbon sinks)', to provide clarity

Net GHG Emissions	Gross emissions from all GHG sources minus the removal of emissions from the atmosphere by carbon sinks. (to tighten the definition to specify what does all GHG sources mean, to avoid confusion)	English	N/A	Genting Plantations	Net GHG emissions defined as "Gross emissions from all GHG sources relevant to palm oil operations minus the removal of emissions from the atmosphere by carbon sinks. For details refer to RSPO's GHG assessment procedure."
Net GHG Emissions	A better explanation is need and a clarity on what is gross emissions.	English	N/A	Solidaridad	Net GHG emissions defined as "Gross emissions from all GHG sources relevant to palm oil operations minus the removal of emissions from the atmosphere by carbon sinks. For details refer to RSPO's GHG assessment procedure."
Net GHG Emissions	Gross emissions from all GHG sources minus the removal of emissions from the atmosphere by carbon sinks. (to tighten the definition to specify what does all GHG sources mean, to avoid confusion)	English	N/A	Malaysia workshop	Net GHG emissions defined as "Gross emissions from all GHG sources relevant to palm oil operations minus the removal of emissions from the atmosphere by carbon sinks. For details refer to RSPO's GHG assessment procedure."
Net GHG Emissions	In Bahasa version, what is the meaning of "rosot"? Better put in english word in the bracket (carbon sink).	English	N/A	Inti Indosawit Subur	Noted. This will be addressed, i.e. replace 'rosot karbon' with 'rosot karbon (carbon sinks)', to provide clarity
New oil palm planting or new oil palm development	Re-introduce reference to the requirement to have secured all permits needed to commence land clearing as of 1-1-2010.	English	N/A	Aidenvironment	Growers still have to comply with all relevant legal requirements before commencing any land clearing

New oil palm planting or new oil palm development	use one term only	English	N/A	Genting Plantations	development' is to also cover other activities related to establishment of new plantation, not only planting
New oil palm planting or new oil palm development	How about replanting from other crops i.e. rubber, paddy, cane etc. to Oil Palm	English	N/A	Malaysia workshop	Refer to Table 1
New oil palm planting or new oil palm development	Web link not necessary	English	N/A	Malaysia workshop	Agreed. Web links not included in NPP as they may become outdated
New oil palm planting or new oil palm development	Propose to change definition to: Planned or proposed planting on land not previously cultivated with oil palm or other agricultural crops, for which no work towards that end has commenced as at 1 Jan 2010.	English	N/A	Musim Mas	Now defined as "Planned or proposed planting on land not previously cultivated with oil palm."

New oil palm planting or new oil palm development	Planned or proposed planting on land not previously cultivated with oil palm, for which no work towards that end has commenced as at January 1, 2010. This definition does not include a clear enough definition of 'no work'. The NPP is aimed at preventing non-compliant land clearance; therefore the definition of 'work' included here should stipulate that it means 'clearance of vegetation'. Otherwise a plan on a piece of paper written in 2009 could be interpreted to mean that 'work towards' the development had already commenced before 2010 and that subsequently there is no need for an NPP in 2015.	English	N/A	WWF	Now defined as "Planned or proposed planting on land not previously cultivated with oil palm."
New oil palm planting or new oil palm development	Siembra de palama aceitera en extensiones de tierra que se realiza en primera vez ,donde no hay cultivo o donde hubo otro tipo de cultivo	Spanish	Planting of oil palm for the first time on tracts of land where there has been no cultivation or where another crop has been grown	Jaremar	Now defined as "Planned or proposed planting on land not previously cultivated with oil palm."
New oil palm planting or new oil palm development	Definisi perlu mencakup pengecualian dan adanya definisi luasan dan tempo waktu	Bahasa	Definition needs to cover exceptions. Definition should also be made on area size and period.	Indonesia workshop	Now defined as "Planned or proposed planting on land not previously cultivated with oil palm."

Participatory	“most relevant stakeholders”: be specific	English	N/A	Malaysia workshop	refer to definition of 'stakeholder' in the P&C 2013
Participatory	Making decisions that affect them.	English	N/A	Malaysia workshop	Noted and incorporated
Participatory	I would clearly define “relevant stakeholders” as including adjacent communities with interests in land management.	English	N/A	Credit Suisse	refer to definition of 'stakeholder' in the P&C 2013
Participatory	In English version, need to rephrase the definition to: “Participatory process which specially provide opportunities for related stakeholders to gather and provide information and make decisions that would affect them.”	English	N/A	Inti Indosawit Subur	substantially the same with current definition
Participatory	In Bahasa version, need to rephrase the definition to: “Proses partisipasi yang khusus memberikan kesempatan bagi para pemangku kepentingan yang terkait untuk berkumpul dan memberikan informasi untuk mengambil keputusan yang akan mempengaruhi mereka.”	English	N/A	Inti Indosawit Subur	substantially the same with current definition

Participatory	Diubah menjadi: Proses yang melibatkan partisipasi, khususnya yang memberikan kesempatan kepada para pemangku kepentingan yang paling terkait untuk berkumpul dan memberikan informasi serta mengambil keputusan yang akan mempengaruhi mereka.	Bahasa	Replace with: Process involving participation, particularly one that provides opportunity for highly relevant stakeholders to gather and provide information and make decisions that will affect them.	Indonesia workshop	substantially the same with current definition
Primary forest	How about local interpretation by local authorities on Primary Forest. Do we consider that?	English	N/A	Malaysia workshop	refer to definition of 'primary forest' in the P&C 2013
Primary forest	FAO link in does not work.	English	N/A	First Resources	Links removed as they may become outdated
Primary forest	Suggest replacing “Also included as primary, are forests that are used” with “Such forests could include forests that are used”. This is because forests that are used inconsequentially by indigenous and local communities living traditional lifestyles relevant for the conservation and sustainable use of biological diversity MAY NOT necessarily be primary forests (unlogged, undisturbed).	English	N/A	First Resources	refer to definition of 'primary forest' in the P&C 2013

Primary forest	Es un bosque que nunca ha sido intervenido y se ha desarrollado bajo procesos y perturbaciones naturales independientemente de su edad.	Spanish	This is a forest that has never been logged and has developed following disturbances and under natural processes, regardless of its age.	Jaremar	refer to definition of 'primary forest' in the P&C 2013
Public Notification	"satisfactory response": please specify	English	N/A	Malaysia workshop	a response that can be accepted by the stakeholders

Public Notification	<p>The definition should also include that the information must be in a format and language that is appropriate to the relevant stakeholders. Oil palm plantation developed in a land previously cultivated with oil palm. Replacing oil palm with a subsequent oil palm crop should only be considered 'replanting' and therefore not subject to the requirements of the NPP if there is not a gap of time between the replanting. Rehabilitation of old, inactive or abandoned plantations should be specifically excluded to ensure that if regeneration of semi-natural habitats has occurred then the company is required to assess its value. The period of time after which rehabilitation of an 'abandoned' plantation should be considered as a new planting and therefore require an NPP should match that specified for existing assessments in Step 3 (WWF suggests it should be 1 year rather than 3 years as proposed).</p>	English	N/A	WWF	abandoned plantations (>3 years) require an NPP
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Public Notification	Tidak adanya perbedaan antara notifikasi untuk on going dan konsultasi public untuk new development, mengingat masih adanya potensi ongoing, sebaiknya tetap dimasukan.	Bahasa	No differences are made between public notification for on-going planting submissions and public consultation for completely new plantings. Considering the possibility that situations for “on-going planting” is still occurring, it is recommended that the “on-going planting” category is still retained.	Indonesia workshop	In the interests of transparency and commitment to responsible development, on-going planting will be removed. This essentially means that all types of new development and expansion is required to go through the same NPP steps including notification for public comments. It should also be clarified that the concept of on-going planting in NPP is only for plantings that straddle the RSPO implementation date of 1st Jan 2010.
Replanting	Oil palm plantation developed on land previously cultivated with oil palm. (further clarification needed for land previously cultivated with other crops)	English	N/A	Genting Plantations	Replacing oil palm with a subsequent oil palm crop is considered as replanting and therefore not subject to the requirements of the NPP if the previous oil palm crop has not been abandoned for more than 3 years.
Replanting	Oil palm plantation developed in a land previously cultivated with oil palm. (further clarification needed for land previously cultivated with other crops)	English	N/A	Malaysia workshop	Replacing oil palm with a subsequent oil palm crop is considered as replanting and therefore not subject to the requirements of the NPP if the previous oil palm crop has not been abandoned for more than 3 years.

Replanting	How about replanting from other crops i.e. rubber, padi, cane etc to Oil Palm. Is this subject to NPP?	English	N/A	Malaysia workshop	Replacing oil palm with a subsequent oil palm crop will be considered as replanting and therefore not subject to the requirements of the NPP if there is not a gap of time between the replanting.
Replanting	Plantación de palma de aceite desarrollada en tierras cultivadas (áreas y lugares) previamente con palma de aceite.	Spanish	Oil palm plantation developed in land (areas and locations) previously cultivated with oil palm.	Solidaridad	Replacing oil palm with a subsequent oil palm crop is considered as replanting and therefore not subject to the requirements of the NPP if the previous oil palm crop has not been abandoned for more than 3 years.
Replanting	¿replantación igual a renovación?	Spanish	Is replanting the same as renewal?	Colombia workshop	Replacing oil palm with a subsequent oil palm crop is considered as replanting and therefore not subject to the requirements of the NPP if the previous oil palm crop has not been abandoned for more than 3 years.
Replanting	Propose change definition to: oil palm plantation developed in a land previously cultivated with oil palm and other agricultural crops.	English	N/A	Musim Mas	Not accepted. Conversion to oil palm from other agricultural crops is not considered as replanting.
Smallholder – Associated	When is the expected completion timeline for the smallholder guidance document and what is the implication of the definitions on the existing operations is the smallholder guidance document is finalised later than this NPP.	English	N/A	Genting Plantations	Efforts will be made to ensure that the NPP will be consistent with the definitions in the RSPO smallholder document once it is finalised

Smallholder – Associated	Note: Definitions to be added once the RSPO smallholder guidance document is finalized. When the expected completion timeline for the smallholder guidance document and what is the implication of the definitions on the existing operations is the smallholder guidance document is finalised later than this NPP.	English	N/A	Malaysia workshop	Efforts will be made to ensure that the NPP will be consistent with the definitions ins the RSPO smallholder document once it is finalised
Smallholder – Associated	The definition also needs to include what 'exclusively contracted' means	English	N/A	WWF	Efforts will be made to ensure that the NPP will be consistent with the definitions ins the RSPO smallholder document once it is finalised
Smallholder – Associated	Seharusnya didefinisikan oleh RSPO secara tertulis di daftar istilah	Bahasa	Should be defined by RSPO in the glossary.	Indonesia workshop	Efforts will be made to ensure that the NPP will be consistent with the definitions ins the RSPO smallholder document once it is finalised
Smallholder – Associated	Associés aux agro-industries ou pour la certification ????	French	Associated with agribusinesses or for certification????	Gabon workshop	Associated refers to the relationship and linkage between the smallholders and the mill on how their farms are managed. Efforts will be made to ensure that the NPP will be consistent with the definitions ins the RSPO smallholder document once it is finalised

Smallholder – Independent	When is the expected completion timeline for the smallholder guidance document and what is the implication of the definitions on the existing operations is the smallholder guidance document is finalised later than this NPP.	English	N/A	Genting Plantations	Efforts will be made to ensure that the NPP will be consistent with the definitions ins the RSPO smallholder document once it is finalised.
Smallholder – Independent	Note: Definitions to be added once the RSPO smallholder guidance document is finalized. When the expected completion timeline for the smallholder guidance document and what is the implication of the definitions on the existing operations is the smallholder guidance document is finalised later than this NPP.	English	N/A	Malaysia workshop	Efforts will be made to ensure that the NPP will be consistent with the definitions ins the RSPO smallholder document once it is finalised.
Smallholder – Independent	Seharusnya didefinisikan secara tertulis di daftar istilah	Bahasa	Should be defined in the glossary. [Note from RLS: I think they mean the RSPO glossary]	Indonesia workshop	Efforts will be made to ensure that the NPP will be consistent with the definitions ins the RSPO smallholder document once it is finalised.
Smallholder – Outgrower	When is the expected completion timeline for the smallholder guidance document and what is the implication of the definitions on the existing operations is the smallholder guidance document is finalised later than this NPP.	English	N/A	Genting Plantations	Efforts will be made to ensure that the NPP will be consistent with the definitions ins the RSPO smallholder document once it is finalised.

Smallholder – Outgrower	Note: Definitions to be added once the RSPO smallholder guidance document is finalized. When the expected completion timeline for the smallholder guidance document and what is the implication of the definitions on the existing operations is the smallholder guidance document is finalised later than this NPP.	English	N/A	Malaysia workshop	Efforts will be made to ensure that the NPP will be consistent with the definitions ins the RSPO smallholder document once it is finalised.
Smallholder – Outgrower	Seharusnya didefinisikan secara tertulis di daftar istilah	Bahasa	Should be defined in the glossary. [I think they mean the RSPO glossary]	Indonesia workshop	Efforts will be made to ensure that the NPP will be consistent with the definitions ins the RSPO smallholder document once it is finalised.
Smallholder – Outgrower	En coopérative ???	French	In a cooperative?	Gabon workshop	Outgrower can be an individual or form a group
Smallholder - Scheme	When is the expected completion timeline for the smallholder guidance document and what is the implication of the definitions on the existing operations is the smallholder guidance document is finalised later than this NPP.	English	N/A	Genting Plantations	Efforts will be made to ensure that the NPP will be consistent with the definitions ins the RSPO smallholder document once it is finalised.

Smallholder - Scheme	Note: Definitions to be added once the RSPO smallholder guidance document is finalized. When the expected completion timeline for the smallholder guidance document and what is the implication of the definitions on the existing operations is the smallholder guidance document is finalised later than this NPP.	English	N/A	Malaysia workshop	Efforts will be made to ensure that the NPP will be consistent with the definitions ins the RSPO smallholder document once it is finalised.
Smallholder - Scheme	Seharusnya didefinisikan secara tertulis di daftar istilah	Bahasa	Should be defined in the glossary. [I think they mean the RSPO glossary]	Indonesia workshop	Efforts will be made to ensure that the NPP will be consistent with the definitions ins the RSPO smallholder document once it is finalised.
Smallholder - Scheme	Qui bénéficie d'un programme public d'accompagnement ??? Ex. programme graine au Gabon !	French	Who benefits from a public support program??? e.g. Seed program in Gabon!	Gabon workshop	Relevance of comment to NPP not understood

Section 1: Introduction

General comments

Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Add more specific detail or explanation	Agregar una sección de antecedentes.	Spanish	Add a section on background information.	Colombia workshop	The background of NPP is covered in 1.1. Will add the importance of NPP and why company has to do it.
Add more specific detail or explanation	Explicar mejor respecto al alcance del documento, objetivo y campo de aplicación.	Spanish	Explain in more depth the range of the document, its objective and scope.	Colombia workshop	Covered in section 1.
Add more specific detail or explanation	Explicar las razones por las cuales se debe implementar el PNP (revisar la sección 1.1).	Spanish	Explain the reasons why the NPP should be implemented (revise section 1.1).	Colombia workshop	Covered in 1.1 and 1.2.
Add more specific detail or explanation	La section 1 est une bonne introduction pour la compréhension des exigences de la NPP, mais il faudrait préciser les cas où la procédure de réparation et de compensation sur la surfaces acquises avant ou après 2010 est applicable en lieu et place des exigences de la NPP	French	Section 1 is a useful introduction to understanding the requirements of the NPP, but we should specify the cases where the Remediation and Compensation Procedures concerning areas acquired before or after 2010 are applicable instead of NPP requirements	Gabon workshop	Compensation is not a tool to deal with NPP non-compliance. The design of Compensation is solely for non compliance with HCV requirements

Add more specific detail or explanation	Recalcar en el texto que el tema de PNP no es únicamente debido a dos criterios sin tener en cuenta todo el principio	Spanish	Emphasize in the text that the issue of NPPs cannot be seen as solely due to two criteria without taking account of the principle as a whole.	Colombia workshop	Noted and incorporated
Add more specific detail or explanation	The section potentially improves in strength if it more clearly explains the purpose of the NPP and how that purpose benefits Members adhering to it. This should emphasise the preventative nature of the NPP.	English	N/A	Oxfam	Noted and incorporated
Clarification of area	There is no clarity on the need of NPP studies for new plantations in area already cultivated, please reevaluate because it could limit new investments.	English	N/A	NES Naturaleza	see new Table 1
Different sizes of growers	Tipificar mejor el detalle de los requerimientos en este documento para el caso de pequeños y medianos y grandes productores (sección 1.2).	Spanish	Describe in more detail the requirements set out in this document for small, medium and large-scale growers (section 1.2).	Colombia workshop	Please refer to notes on smallholders. We cannot exempt smallholders from this requirement but will have to look into guidance for assessments for smallholders that can simplify and streamline the NPP process for them

External consistency	Hacer referencia cruzada de otros documentos normativos de RSPO que apliquen igualmente	Spanish	Cross-reference other RSPO policy documents that would also be applicable.	Colombia workshop	Noted and incorporated
Graphics	Incluir más gráficos explicativos en esta sección.	Spanish	Include more explanatory graphics in this section.	Colombia workshop	Have included more explanatory tables
Mitigating circumstances	Considerar que hay desarrollos asociados que no están vinculados a la actividad de nuevas plantaciones (Ejemplo: Se construirá una báscula como punto de acopio que no necesariamente está vinculado a la NP si no a la mejora de la logística de transporte de los cultivos existentes)	Spanish	Take into account that there are related developments which are not linked to the activity of new plantations (for example: a scale is constructed that is not necessarily related to the NPP but improves the transport logistics for existing plantations)	Colombia workshop	NPP is for new development area and it should be conducted before any land clearance activity took place. If the scale is located within the proposed development area, it should be only established after NPP process has been completed.

Mitigating circumstances	On-going plantations needs to stay as a concept taking into account external factors that affect planting. Suggestion is to add a period terms for updating NPP in case of delay in planting.	English	N/A	NES Naturaleza	The work and effort required in preparing for an NPP submission is similar regardless of whether it was for an “ongoing planting” or for a “new planting” with the only difference being the provision for public comments. The “ongoing planting” is only for cases where the development straddles the NPP implementation date of 1st January 2010. The secretariat believes that there should be no longer cases such as this as the NPP was introduced more than 5 years ago. Even in cases where there are, most likely in Indonesia, for consistency, the Secretariat would like to move away from a 2 tiered approach when it comes to NPP.
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Requirements, process, parameters or criteria	Agregar el uso de información histórica, evidencias distintas y adicionales a imágenes de satélite del predio que permitan validar que no se trata de una nueva plantación	Spanish	Add the use of historical information and specific items of evidence in addition to the satellite images of the ground to prove that there is no evidence of new planting.	Colombia workshop	The requirement in NPP is Land Use Change Analysis and additional useful historical information is welcome. This additional info must not replace LUCA. The LUCA is to determine the change of land use cover from Nov 2005 and if HCV liability exist, it will be useful for compensation process later.
Requirements, process, parameters or criteria	Eliminar el requerimiento de PNP cuando una empresa opta por nueva siembras de palma en suelos que ya tienen otro uso agropecuario (ejemplo: reemplazo de cultivos de bananas a palma)	Spanish	Remove the NPP requirement in cases where a company chooses to plant new palm seeds in soil that has other agricultural uses (e.g. replacing bananas with palms)	Colombia workshop	Refer to Table 1.
Requirements, process, parameters or criteria; Add more specific detail or explanation	How would the NPP be applied to operations that have been suspended from RSPO membership? There needs to be clarification on how companies that have been suspended from RSPO membership can be reinstated after compliance with the NPP.	English	N/A	Ghana workshop	If the suspended member is still interested in being a member, then of course it is in their best interest to comply with all RSPO requirements. Otherwise, their suspension will lead to expulsion

Scope and focus (involving government)	Esta actualización del PNP de 2015, se ha hecho para mejorar la claridad y la eficacia del proceso y la documentación relacionada existente, así como para garantizar la coherencia con los nuevos requisitos introducidos en los PyC RSPO 2013, y en particular. Para que se cumpla con este párrafo de la introducción ,estos procesos tan importantes en un país que se dedica al cultivo de palma, deberían ser socializados con los Gobiernos y especialmente con las instancias regulatorias, ya que de lo contrario difícilmente el proceso puede ser eficaz.Veo con gran preocupación el avance de la palma en áreas y sin previas evaluaciones requeridas por la RSPO Y mucho menos por la ley Nacional .	Spanish	This update of the 2015 NPP has been carried out to improve the clarity and effectiveness of the existing process and related documentation, and to ensure consistency with the new requirements introduced in the RSPO priniples and criteria in 2013, and in particular:- To ensure compliance with this introductory paragraph, these processes which are so important in a country committed to palm cultivation should be carried out in consultation with governments and, in particular, with the regulatory bodies; otherwise it would be difficult for the process to be effective.I note with great concern the encroachment of palm in areas that have had none of the prior assessments required by the RSPO and, to a much lesser extent, by national law.	Jaremar	Noted
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Smallholders	Es poco factible la implementación por pequeños productores en Colombia dado que gozan de autonomía en relación a la planificación de crecimiento de sus cultivos y están influenciados por sus situaciones económicas y desligadas de una empresa o extractora ancla.	Spanish	Use by smallholders in Colombia is impractical given that they independently plan what crops they want to grow and that they are influenced by their own economic circumstances and not subject to any “anchor” company or mill.	Colombia workshop	If independent smallholders become RSPO members NPP still applies, no exceptions
Smallholders	Compliance with NPP would be challenging for smallholders.	English	N/A	Ghana workshop	If independent smallholders become RSPO members NPP still applies, no exceptions
Smallholders	Prinsip 5.4 dan 5.6 tidak berlaku bagi petani swadaya, dan hanya berlaku bagi perusahaan besar. Tentu saja keberlakuan yang dimaksud oleh prinsip 5.4 dan 5.6 belum dapat diterapkan pada petani diatas Januari 2010. Karena prinsip 5.4 dan prinsip 5.6 masih tidak berlaku bagi petani, sampai P&C untuk petani di endorse oleh RSPO.	Bahasa	Principles 5.4 and 5.6 only apply to major companies, not to independent smallholders. The principles are definitely yet to be applicable to smallholders after January 2010. These principles remain non-applicable to smallholders until the P&C for smallholder is endorsed by RSPO.	Setara Jambi	5.4 and 5.6 are for existing operations not for NPP - new developments
Smallholders	Sebaiknya penerapan NPP bagi petani adalah mengikuti P&C untuk petani swadaya.	Bahasa	NPP implementation for smallholders should follow P&C for independent smallholders.	Setara Jambi	Noted

Smallholders	Semua NPP harus di implementasikan diatas Januari 2010. Lalu bagaimana dengan petani swadaya, dimana indikatornya belum di endorse oleh RSPO, dan masih dalam tahap pembahasan.	Bahasa	All NPP should be implemented after January 2010. What about independent smallholders whose indicators are yet to be endorsed by RSPO (the discussion is still ongoing)?	Setara Jambi	NPP applies to smallholders. However, a guidance for smallholders will be developed
Syntax, definitions and terminology	In 1.2 there is a mix in terms and conditions that apply for members and no- members of RSPO. All about members should be under members category	English	N/A	NES Naturaleza	NPP only applies to RSPO members
Syntax, definitions and terminology	Sebaiknya, format diperjelas tentang kriteria yang bertanggung jawab (point & sub point diganti dengan huruf atau angka)	Bahasa	Format should be made clear regarding the responsible criteria (points and sub-points should be replaced with letters or numbers).	Indonesia workshop	Format has been improved.
Technical clarification (size area); Smallholders	Guideline for smallholder's responsibility should be clearly state in terms of hectares expansion that needs to have NPP. Not all smallholders expand at the same time and many of them for less than 10 hectares.	English	N/A	NES Naturaleza	Noted.

<p>Technical clarification (timeframe)</p>	<p>Detallar cuál es el requerimiento para aquellas plantaciones ya establecidas después del 2010</p>	<p>Spanish</p>	<p>Specify the requirements for those plantations that have already been established since 2010</p>	<p>Colombia workshop</p>	<p>For plantations that have been fully established before 1st Jan 2010, then no need for NPP. But for plantations that started operations before Jan 2010 and are still planting, then NPP applies. In the past, they will submit as an ongoing planting report which is not open to public comments. With the new document, it will be.</p>
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<p>Technical detail (wildlife)</p>	<p>In areas that are within orang-utan ranges, 500 ha for an internal assessment seems too big an area, we suggest that the oil palm company contact RSPO ENGO who are specialised in orang-utan work on the ground for feedback and allow for enough time to give feedback (min 30 days). We understand that in the near future the PONGO Alliance will be producing an orang-utan range map and this can be used as reference by the companies. This will be a positive move by the companies to avoid future conflict with orang-utans and other wildlife and also combat bad publicity for the companies if an issue with protected species comes up at a later stage. RSPO ENGO's are always ready to provide feedback to companies to avoid future conflicts or work retroactively (prevent damage instead of fixing damage).</p>	<p>English</p>	<p>N/A</p>	<p>Hutan</p>	<p>This is too specific. It is not practical to have species specific criteria and regional specific criteria in a generic document</p>
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Comments on subsections of Section 1

Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
1.1. What is the RSPO New Planting Procedure (NPP)?	Add more specific detail or explanation	Definisi NPP pada dokumen kurang jelas, definisi yang ada hanya terbatas pada definisi new planting. Sebaiknya ditambahkan definisi dan ruang lingkup yang tidak menimbulkan multi tafsir.	Bahasa	The definition of NPP in the document is unclear because it is limited only on new planting. It is suggested to add definition and scope that avoid multi-interpretation.	Indonesia workshop	NPP is for new development.
1.1. What is the RSPO New Planting Procedure (NPP)?	Add more specific detail or explanation	Paragraph 4, last bullet point, should add: "HCV assessments which had been done by RSPO approved assessors before HCV RN is established is still valid"	English	N/A	Inti Indosawit Subur	Will add text stating that the ALS requirement will be based on scheme available at that time of the HCV assessment (i.e. if HCV assessment conducted before creation of the ALS then exempt - unless report older than 3 years).

1.1. What is the RSPO New Planting Procedure (NPP)?	Add more specific detail or explanation	Ruang lingkup NPP belum menginformasikan apakah NPP ini merupakan persyaratan melakukan pembukaan lahan sesuai peraturan perolehan lahan di Indonesia atau pemenuhan persyaratan RSPO dengan telah dilakukan HCV, dan SIA assessment	Bahasa	NPP scope is yet to inform whether it is a requirement for land clearing under Indonesian land acquisition regulation or an RSPO requirement given the HCV assessment and SIA.	Indonesia workshop	NPP is a RSPO requirement not a legal requirement
1.1. What is the RSPO New Planting Procedure (NPP)?	Add more specific detail or explanation	Ruang lingkup NPP belum menjelaskan untuk apakah mulai dari kegiatan penanaman atau mulai land clearing	Bahasa	NPP scope is yet to describe whether it starts from planting or land clearing activities.	Indonesia workshop	Before land clearing and land preparation. Basically no work should be done on the land prior to NPP
1.1. What is the RSPO New Planting Procedure (NPP)?	Add more specific detail or explanation	The text provides background but not an explanation of what is NPP and why it is needed	English	N/A	NES Natureleza	Noted and incorporated
1.1. What is the RSPO New Planting Procedure (NPP)?	Add more specific detail or explanation	This section would be strengthened if it was made explicit that the scope of the NPP should be to ensure that all elements of P&C 2013 Principle 7 are being implemented at the time of new development.	English	N/A	WWF	Noted and incorporated

1.1. What is the RSPO New Planting Procedure (NPP)?	Add more specific detail or explanation	What are the 'carbon sequestration options'? To include examples?	English	N/A	Malaysia workshop	This should be covered in the GHG Assessment Procedure for New Plantings (C7.8) and not in NPP.
1.1. What is the RSPO New Planting Procedure (NPP)?	Clarify consequences of non-compliance	This section ought to include a clear indication of what the sanctions are that the RSPO has for a failure to submit an NPP when required.	English	N/A	WWF	Noted. RSPO is working to address the issue of sanctions
1.1. What is the RSPO New Planting Procedure (NPP)?	External consistency	Pada kalimat "Kepatuhan terhadap prosedur NPP harus memastikan kesesuaian dengan P&C RSPO bagi Produksi Minyak Kelapa Sawit Berkelanjutan dengan mewajibkan pelaksanaannya sebelum pendirian perkebunan dan selama fase pengembangan", perlu ditambahkan kesesuaian dengan prosedur lainnya seperti RSPO Compensation procedure dll.	Bahasa	This sentence: "Compliance with the NPP should ensure alignment with corresponding RSPO Principles and Criteria for the Production of Sustainable Palm Oil (RSPO P&C) by requiring their implementation prior to plantation establishment and during the development phase." needs to be added	Indonesia workshop	Please see comments relating to NPP and compensation

				with conformity with other procedures such as RSPO Compensation Procedure, etc.		
1.1. What is the RSPO New Planting Procedure (NPP)?	External consistency	The text must specify the alignment of the NPP as mandatory complement to P&C.	English	N/A	NES Naturaleza	It is already mentioned in section 1.1 that NPP is for principle 7 and the current exercise is to add new requirements in RSPO P&C 2013.
1.1. What is the RSPO New Planting Procedure (NPP)?	Internal consistency	Paragraph 2, last sentence. It is mentioned “from Jan 2010” while in Section 1.2, Paragraph 1, first sentence, it stated “after Jan 2010”.	English	N/A	Inti Indosawit Subur	Accepted. Based on the existing NPP, the term used is from Jan 2015. Will maintain consistency.
1.1. What is the RSPO New Planting Procedure (NPP)?	Internal consistency	Dalam 1.1 par 2, last line : from Jan 2010 – different from 1.2 started after Jan 2010.	Bahasa	In section 1.1 para 2, last line: from Jan 2010 – this is different from section 1.2: started after Jan 2010.	Indonesia workshop	Accepted. Based on the existing NPP, the term used is from Jan 2015. Will maintain consistency.

<p>1.1. What is the RSPO New Planting Procedure (NPP)?</p>	<p>Requirements, process, parameters or criteria</p>	<p>Kriteria yang seperti apa yang diharuskan dilakukannya NPP</p> <p>Saran: Jika terdapat lebih dari satu jenis tanaman perkebunan pada area konsesi perkebunan (sawit) yang dikelola (Sawit dan Karet pada area HGU), maka tidak diperlukan adanya NPP apabila akan dilakukan konversi menjadi sawit.</p> <p>Saran: Tidak diperlukan adanya NPP jika terdapat area belum tertanam dan sudah menjadi HGU sebelumnya.</p>	<p>Bahasa</p>	<p>Under what conditions should NPP be required? Suggestion: Where conversion to oil palm is conducted on an area already planted with more than one plantation commodity (i.e. oil palm and rubber on the HGU concession), no NPP should be required.</p> <p>Suggestion: No NPP would be required if an unplanted area came from a land that is already a prior HGU concession.</p>	<p>Indonesia workshop</p>	<p>1st suggestion: see table 1 2nd suggestion: not accepted</p>
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<p>1.1. What is the RSPO New Planting Procedure (NPP)?</p>	<p>Requirements, process, parameters or criteria</p>	<p>Los Productores de Latinoamérica, estamos en desventaja con estos procesos, en vista que la plataforma de información está en Ingles, y no ha existido una guía para que los Miembros cumplan con los Procedimientos (Que bueno que ya existe un representante y que nos mantiene informados, sugiero que las responsabilidades se cumplan una vez que se es miembro de RSPO, donde el productor una vez que se</p>	<p>Spanish</p>	<p>We Latin American growers are at a disadvantage with these processes, since the information platform is in English, and there are no guidelines for members on how to comply with the procedures (so it is good that a representative has been on hand to keep us informed) and I would suggest that such responsibilities should be taken on once the grower becomes a member of RSPO, and once the grower ...</p>	<p>Jaremar</p>	<p>NPP is only applicable to RSPO members. The finalised NPP will be translated into Spanish and also other languages to help members to understand the procedures. The working language in RSPO is English and all documents submitted to RSPO must be in English. In case of discrepancies, the English version will prevail.</p>
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1.1. What is the RSPO New Planting Procedure (NPP)?	Requirements, process, parameters or criteria	The HCV assessment conducted by RSPO approved assessor must be recognised and valid prior to the implementation of the ALS by HCV RN	English	N/A	Sinar Mas	The RSPO Approved Assessor scheme has been discontinued and all HCV assessors registered with RSPO expired on 31st of Dec 2014. RSPO Approved Assessor scheme is currently replaced by HCV ALS under HCVRN. All HCV assessments conducted from 1 Jan. 2015 must be undertaken according to the HCV ALS requirement. Assessor requirements in NPP are based on assessor scheme available at the time of the HCV assessment. For example, if HCV assessment contract was signed before the HCV ALS was launched,
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						company should use RSPO Approved Assessor.
1.1. What is the RSPO New Planting Procedure (NPP)?	Requirements, process, parameters or criteria	The HCV assessment conducted by RSPO approved assessor must be recognised and valid prior to the implementation of the ALS by HCV RN.	English	N/A	GAR	Will add text stating that the assessor scheme requirement will be based on scheme available at that time of the HCV assessment.
1.1. What is the RSPO New Planting Procedure (NPP)?	Requirements, process, parameters or criteria (carbon footprint)	En base a que se determinara si la huella de carbono está en un límite permisible, existe alguna base actual de comparación para operaciones de palma de aceite	Spanish	How shall it be determined whether the carbon footprint is within permissible limits, is there a current comparison baseline for palm oil operations?	Grepalma	There is no threshold being introduced at the moment.

1.1. What is the RSPO New Planting Procedure (NPP)?	Requirements, process, parameters or criteria (compliance)	<p>“If an RSPO member does not comply with the NPP requirements for a new development after January 1st 2010, the member must immediately enter the RSPO Remediation and Compensation Procedure, in order to determine whether the unit can still be certified.”</p> <p>It remains unclear how it will be determined that a member does not comply with the NPP requirements. Either the unit or portions thereof can be excluded from future certification.</p>	English	N/A	Aidenvironment	Noted. RSPO is working to address the issue of sanctions
1.1. What is the RSPO New Planting Procedure (NPP)?	Requirements, process, parameters or criteria (contingencies)	Aclarar las circunstancias posibles al momento, por ejemplo qué debo hacer sino se cumplió con el PNP en su momento debido	Spanish	Clarify the contingencies that might arise, for example what action should be taken if the NPP is not carried out within the allotted time.	Colombia workshop	Noted. RSPO is working to address the issue of sanctions
1.1. What is the RSPO New Planting Procedure (NPP)?	Structure of document	<p>Sur la présentation, les normes devrait apparaitre pour mieux faire la comparaison entre la norme et les modifications.</p> <p>Exemple : reproduire le critère 7.8 avant d’énoncer la modification.</p>	French	On the presentation, the standards should be shown to allow easier comparison between the standard and the modifications. Example: repeat	Gabon workshop	Not accepted.

				critterion 7.8 before stating the change.		
1.1. What is the RSPO New Planting Procedure (NPP)?	Syntax, definitions and terminology	A brief introduction and definition of the NPP at section 1.1 Sequestration and other technical words should be explained. Standard value for GHG emissions to operate.	English	N/A	TOPP	There is no threshold being introduced at the moment. Glossary for technical words are being developed.
1.1. What is the RSPO New Planting Procedure (NPP)?	Syntax, definitions and terminology	Agregar el nombre completo Alto Valor de Conservación en el primer párrafo, únicamente se menciona AVC y es la primera mención en el cuerpo principal del documento	Spanish	Add the phrase "high conservation value" in full in the first paragraph; reference is only made to the acronym HCV, even though this is the first such reference in the main body of the document	Colombia workshop	Noted
1.1. What is the RSPO New Planting Procedure (NPP)?	Syntax, definitions and terminology	Critère 7.3 : S'accorder sur l'utilisation des termes « affectation » et « occupation » des terres	French	Criterion 7.3: Agree on the use of the terms "land use" and "land cover".	Gabon workshop	Land Use term must follow RSPO P&C 2013. Although the correct term should be Land

						Use Cover Change Analysis.
1.1. What is the RSPO New Planting Procedure (NPP)?	Syntax, definitions and terminology	Definisi NPP dan ruang lingkup NPP mohon dituangkan juga dalam sub bab 1.1	Bahasa	Please put NPP definition and scope into the Sub-Section 1.1.	Indonesia workshop	Noted and incorporated
1.1. What is the RSPO New Planting Procedure (NPP)?	Syntax, definitions and terminology	Explication du sigle « SLE »	French	Explanation of what the acronym "ALS" means	Gabon workshop	Noted and incorporated
1.1. What is the RSPO New Planting Procedure (NPP)?	Syntax, definitions and terminology	Penjelasan mengenai definisi Land Clearance apakah sama dengan yang di Daftar Istilah dengan Land Preparation.	Bahasa	Is the explanation on Land Clearance definition the same as Land Preparation definition in the glossary?	Indonesia workshop	Land clearance is part of land preparation. No activities are allowed on the new development area until NPP process has been completed.
1.1. What is the RSPO New Planting Procedure (NPP)?	Technical clarification (timeframe)	HCV yang dilakukan oleh approved list assessor RSPO adalah valid sebelum HCV RN diberlakukan	Bahasa	HCV assessment carried out by assessors from RSPO approved list is valid before HCVRN takes effect.	Indonesia workshop	Yes. This is currently being implemented. HCV assessor requirement for NPP is according to assessor scheme available at that time.

1.1. What is the RSPO New Planting Procedure (NPP)?	Technical clarification (timeframe)	Need clarification. What if HCV assessment was carried out prior to the enforcement of RSPO P&C 2014? What is necessary to be done for LUC assessment?	English	N/A	Inti Indosawit Subur	Yes, Land Use Change Analysis must be carried out
1.1. What is the RSPO New Planting Procedure (NPP)?	Technical clarification (timeframe)	New P&C only come to force in April 2013, hence Land Use Change Analysis is only applicable for HCV assessment after April 2013.	English	N/A	Musim Mas	Land use change analysis (LUCA) must be added on. LUCA is not part of HCV assessment
1.1. What is the RSPO New Planting Procedure (NPP)?	Technical detail	[Note from RLS: I think this comment just presents the text for the last bullet point in 1.1 as they think it should read] Endorsement of the High Conservation Value Resource Network (HCVRN) Assessor Licensing Scheme (ALS) as a robust and credible replacement for the RSPO Approved HCV Assessor list, now obsolete. The ALS is effective from January 1st, 2015. All HCV assessment reports must successfully pass the HCVRN ALS quality control system before being submitted as part of the NPP.	English	N/A	HCVRN	Noted and incorporated

<p>1.1. What is the RSPO New Planting Procedure (NPP)?</p>	<p>Technical detail</p>	<p>Con el fin de lograr la certificación con éxito, en todas las plantaciones nuevas a partir de noviembre de 2005 que se encuentren dentro de cualquiera de sus propiedades se debe haber realizado una evaluación de AVC y estudios de Impacto ESI antes del comienzo del despeje de tierras. ...Se ha hecho para mejorar la claridad, La eficacia y ordenar el proceso Criterio 7.8: requiere que los nuevos desarrollos de las plantaciones se diseñen de modo que se minimicen las emisiones netas de GEI, teniendo en cuenta No Plantar en terrenos con elevadas reservas de carbono (ERC) de xxxx (parámetro) y/o las opciones de secuestro de carbono. (se sugiere agregar un parámetro sea un mínimo o un rango).</p>	<p>Spanish</p>	<p>In order to achieve certification successfully all new plantings since November 2005 within any of their holdings must have had an HVC assessment and SEIA impact study prior to land clearance starting. ... This ... is to improve the clarity and effectiveness of the process and to manage the process. Criterion 7.8: requires that any new plantation developments are designed to minimize net GHG emissions, taking into account avoidance of land areas with</p>	<p>Solidaridad</p>	<p>Not accepted . NPP is more than just SEIA and HCV assessments and there are not threshold yet for HCS.</p>
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				high carbon stocks (HCS) of xxxx (parameter) and/or sequestration options. (It is suggested that a parameter be added here in the form of a minimum or a range)		
1.1. What is the RSPO New Planting Procedure (NPP)?	Technical detail	Memerlukan klarifikasi teknis untuk menjawab pertanyaan: - apakah diperlukan LUC jika HCV assessment dilakukan sebelum diberlakukan PnC 2013?	Bahasa	Require technical clarification to answer: - Is LUC needed if HCV assessment was carried out before P&C 2013 was in effect?	Indonesia workshop	LUCA must be done
1.1. What is the RSPO New Planting Procedure (NPP)?	User-friendliness	more clearly explain the purpose of the NPP: elaborate and highlight more clearly “the aim to provide a framework for responsible development..”etc	English	N/A	Oxfam	Noted and incorporated

1.1. What is the RSPO New Planting Procedure (NPP)?	User-friendliness	No es suficientemente claro ni amigable para una persona que lee por primera vez el documento	Spanish	It is neither sufficiently clear nor user-friendly for someone reading the document for the first time.	Colombia workshop	Not accpeting this. Section 1 is dedicated to introduce NPP with subsections on what is NPP, why it is required and how and who it is applied to.
1.1. What is the RSPO New Planting Procedure (NPP)?		Se realiza una reseña, mas no se especifica claramente qué es o se da respuesta a esta pregunta. Se sustenta el por qué se creó el procedimiento de nuevas plantaciones y por qué se está actualizando. El texto se relaciona más a la parte de antecedentes del documento que como respuesta al título de la sección.	Spanish	While a review was carried out, it did not clearly define what this is, nor answer this question. The underlying issue is why a procedure for new plantations was established and why it is being updated. The text relates more to the section on background information to the document than as an explanation of the title of the section.	Colombia workshop	Text added on importance of NPP. Section 1 is dedicated to introduce NPP with subsections on what is NPP, why it is required and how and who it is applied to.

Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
1.2. Who is responsible for NPP compliance?	Add more specific detail or explanation	Con respecto al PNP para Certificación de Grupo debe detallar más explicación sobre las responsabilidades del Gestor de grupo, Como es la comunicación con RSPO al respecto, como se informa el proyecto de nuevas plantaciones, si se hace una vez por año, si se envían polígonos de todas las parcelas con su respectivo Ha., se indica el nombre de cada productor que están haciendo nuevos desarrollos...	Spanish	With regard to NPPs, for group certification more details must be provided on the responsibilities of the group manager: how communication should be carried out with RSPO in this regard, how the project is to be informed about new plantings, whether this is to be done once per year, whether charts are to be sent of all parcels of land with their respective areas, whether the name of each grower implementing these new developments is	Jaremar	Please see related notes on smallholders

				to be indicated ...		
1.2. Who is responsible for NPP compliance?	Add more specific detail or explanation	Definition of Scheme & Associated Smallholders to be clarified.	English	N/A	Malaysia workshop	Will take from smallholder doc
1.2. Who is responsible for NPP compliance?	Add more specific detail or explanation	Explicar mejor cuál es el alcance del gestor del grupo y los pasos a seguir en el escenario donde un productor independiente ha tenido nuevas siembras y quiere ingresar a un grupo ya certificado. ¿Las compensaciones en certificación grupal se pueden realizar a nivel grupal o de forma individual?	Spanish	Explain more clearly what the scope of the group manager is, and what steps are to be followed in cases where an independent grower has new seeds and wants to join an already certified group. Are compensatory payments for group certification made on a group or individual basis?	Colombia workshop	Please see related notes on smallholders
1.2. Who is responsible for NPP compliance?	Add more specific detail or explanation	More specific scenarios is required to elaborate different situations.	English	N/A	Genting Plantations	see table 1

1.2. Who is responsible for NPP compliance?	Add more specific detail or explanation	More specific scenarios is required to elaborate different situations.	English	N/A	Malaysia workshop	see table 1
1.2. Who is responsible for NPP compliance?	Add more specific detail or explanation	Pada bagian non member yang mengikuti sertifikasi RSPO:Perlu ada penjelasan kapan proses kompensasi dapat dikatakan selesai?	Bahasa	In the section of non-members that follow RSPO certification: Explanation is necessary on when compensation process can be considered complete.	Indonesia workshop	language on non-members removed from NPP
1.2. Who is responsible for NPP compliance?	Add more specific detail or explanation	Page 8. Smallholders section, last sentence. It stated that the NPP will be submitted to RSPO Secretariat by Group Manager. Why is it not sent to CB for verification? Need clarification.	English	N/A	Inti Indosawit Subur	Group manager is responsible to do NPP rather than individual farmers in the group. NPP still needs to be submitted to CB for verification.
1.2. Who is responsible for NPP compliance?	Add more specific detail or explanation	The document needs to clearly states responsibilities for who is a member and who is not a member of the RSPO.	English	N/A	NES Naturaleza	Only members need to do NPP. It should also be clear that members with subsidiaries where they have 50% ownership or

						more or management control, those subs also are subjected to the NPP requirement. See 1.3
1.2. Who is responsible for NPP compliance?	Add more specific detail or explanation	Untuk Indonesia – NPP hanya dilakukan setelah IUP dan Hak Pelepasan Hutan dilakukan. Note: Clarification on why this note applied	Bahasa	For indonesia – NPP is carried out upon IUP and Forest Rights Relinquishment. Note: Clarification on why this note applied	Indonesia workshop	This note is added to clarify that NPP should only be submitted once IUP is received
1.2. Who is responsible for NPP compliance?	Add more specific detail or explanation	What does comply mean? Does grower need to go to Compensation panel? Does it mean no certification? – May need to be in member’s guidance	English	N/A	Malaysia workshop	no longer relevant
1.2. Who is responsible for NPP compliance?	Add more specific detail or explanation (RSPO members and non-members)	Land taken over by RSPO vs non-RSPO member should be made clearer for Compensation Procedures	English	N/A	Malaysia workshop	no longer relevant

1.2. Who is responsible for NPP compliance?	Clarification of area	“If land clearing is actively occurring at the time of purchase, operations must be stopped and the NPP requirements (as per the current document) complied with for the area that has not yet been converted”: Is the NPP will be applicable for the area not yet converted or includes area converted and put under compensation?	English	N/A	Malaysia workshop	NPP for areas not yet cleared
1.2. Who is responsible for NPP compliance?	Clarification of area	“If the grower engages towards RSPO certification” (Page 7) – RSPO certification of the newly planted area or existing area?	English	N/A	Malaysia workshop	Not sure what the comment means but certification unit is mill and supply base, even immature areas
1.2. Who is responsible for NPP compliance?	Clarification of area	At the point of certification” – Is this the certification of the newly planted area? Is this have any effect to the partial certification once the company engaged in compensation process?	English	N/A	Malaysia workshop	Not to be confused with compensation. RSPO does not allow partial certification
1.2. Who is responsible for NPP compliance?	Different sizes of growers	Untuk NPP Smallholder seharusnya tidak sama dengan kebun ini untuk standardnya, untuk diberikan kemudahan, perbedaan antara NPP inti dan plasma	Bahasa	Standards should differ between NPP for smallholder and nucleus plantations in order to easily recognise differences between nucleus and plasma NPPs	Indonesia workshop	please refer to notes on smallholders

1.2. Who is responsible for NPP compliance?	External consistency	<p>Current wording on NPP compliance (last paragraph): “If an RSPO member does not comply with the NPP requirements for a new development after January 1st 2010, the member must immediately enter the RSPO Remediation and Compensation Procedure, in order to determine whether the unit can still be certified” Comment: This statement contradicts with the scope of the RSPO Compensation & Remediation procedure - “land clearing without prior HCV assessment”.</p> <p>Propose to change the statement to: “Any RSPO member who does not comply with the NPP, should enter into the NPP, and should there be land clearing without prior HCV assessment, only then they will have to enter into the RSPO Remediation and Compensation procedure”.</p>	English	N/A	Inti Indosawit Subur	no longer relevant as this sentence “If an RSPO member does not comply with the NPP requirements for a new development after January 1st 2010, the member must immediately enter the RSPO Remediation and Compensation Procedure, in order to determine whether the unit can still be certified” has been removed
1.2. Who is responsible for NPP compliance?	Graphics	Agregar diagrama de flujo, para productores y gestores de grupo.	Spanish	Add a flowchart for the growers and group managers.	Colombia workshop	see figure 1
1.2. Who is responsible for NPP compliance?	Graphics	<p>Include a matrix (table) to clarify the process (RSPO member vs RSPO non-member. E.g. Buyer Seller Actions/ Process RSPO RSPO .. RSPO Non-RSPO ... Non-RSPO RSPO ... Non-RSPO Non-RSPO ...</p>	English	N/A	Malaysia workshop	see figure 1

<p>1.2. Who is responsible for NPP compliance?</p>	<p>Graphics</p>	<p>Sería conveniente definir una matriz para indicar la responsabilidad de cada tipo de productor(miembro, no miembro, pequeño productor, de sistema, de contrata, asociado, independiente o de grupo e indicar los pasos a seguir en relación a PNP antes o después de enero/2010 y la Vinculación que se debe de hacer con los procedimientos de Remediación y Compensación y la Evaluación de AVC.</p>	<p>Spanish</p> <p>It would be useful to draw up a table setting out the responsibility of each type of producer (member, non-member, smallholder, scheme smallholder, outgrower, associate, independent or group) and showing the steps to be followed for NPPs before or after January 2010 and whatever linkages there should be with the remediation and compensation procedures and the HCV assessment procedure.</p>	<p>Jaremar</p>	<p>see figure 1</p>
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1.2. Who is responsible for NPP compliance?	Graphics; Add more specific detail or explanation	Tersedia solusi atau matriks dijabarkan secara matrik dan seluruh kondisi seperti sebuah perusahaan telah melakukan remediasi dan kompensasi untuk sebagian arealnya	Bahasa	To provide a solution matrix taking into account all scenarios for a company such as fulfilment of remediation and compensation for parts of its concession.	Indonesia workshop	Refer to Table 1 and Figure 1.
1.2. Who is responsible for NPP compliance?	Internal consistency	“submit the corresponding NPP notification to the RSPO Secretariat” – contradicts Section 2 process flow and Annex 2 process; should be CB’s responsibility	English	N/A	Malaysia workshop	Noted
1.2. Who is responsible for NPP compliance?	Requirements, parameters or criteria	Qué pasa si hay un plan previo de compensación ya en marcha con una corporación ambiental, y se identifica un AVC ¿Debe hacerse otro plan de compensación?	Spanish	What if there is a previous compensation plan already in operation with an environmental corporation, and an HCV is then identified, should another compensation plan be made?	Colombia workshop	No. Compensation only take place via compensation mechanism. This is NPP.

1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	Highlight warna biru: - tertulis” maka perusahaan yang bersangkutan turut bertanggung jawab...” kami menanyakan bagaimana mekanisme jika smallholder menolak?	Bahasa	Blue highlight: The text is written as ‘then the related company is also responsible.....’. What is the mechanism if smallholder refuses?	Indonesia workshop	if the smallholder is rspo member they cannot refuse to do NPP
1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	La RSPO debe inmediatamente informar al Nuevo Miembro cuales son las responsabilidades inmediatas relacionadas a Nuevas Plantaciones y Procedimiento de Compensación, para que el productor pueda asumir esa responsabilidad lo antes posible y que le definan fechas.	Spanish	The RSPO must immediately inform new members of their immediate responsibilities relating to new plantings and the compensation procedure, so that the growers can discharge those responsibilities as quickly as possible, and set timelines.	Jaremar	New development can occur in many scenarios. For example, if a company is acquiring a plantation for new development, it is their responsibilities to submit liability disclosure to the company. By now, all liability disclosure for existing concessions are captured during staged implementation period.

1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	Pada bagian non member yang mengikuti sertifikasi RSPO: Istilah kompensasi telah completed diganti dengan development program approved, karena terlalu lama jika harus menunggu proses kompensasi selesai	Bahasa	In the section of non-members that follow RSPO certification: Parts saying “the whole compensation process will have to be completed” should be replaced with “development programme is approved” because it would take too long to wait for the compensation process to complete.	Indonesia workshop	no longer relevant
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1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	Sometimes in-principle approval obtained but there is a time lag before formal approvals are received from the government (eg in Africa) Propose that NPP can be submitted with commitment that no development will proceed until formal approvals are received. Inprincipal agreement from Government (Africa) obtained	English	N/A	Indonesia workshop	there must be proof that the documents required to develop the land are there before NPP is submitted. Also, if EIAs are national requirements, approval of the EIAs are also needed
1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	"...submitted to the RSPO Secretariat by the Group Manager." – CB's responsibility	English	N/A	Malaysia workshop	no. Refer to Step 6.
1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	"If an RSPO member does not comply with the NPP requirements for a new development after January 1st 2010, the member must immediately enter the RSPO Remediation and Compensation Procedure, in order to determine whether the unit can still be certified": Does the grower (RSPO Member) can clear land without NPP and then put under Compensation.	English	N/A	Malaysia workshop	no longer relevant
1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	"In the case of Group Certification, the NPP notification documents should be compiled and submitted to the RSPO Secretariat by the Group Manager": "For Group Certification is the Group Manager submit the NPP?"	English	N/A	Malaysia workshop	no. its still the CB. See related comment

1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	Aclarar si la afirmación de que “todo el proceso de compensación esté completado”, se refiere a que se haya terminado el documento o a que ya se haya implementado y pagado. Hacer más explícito cuándo se considera cumplido el proceso de PNP.	Spanish	To clarify whether the statement that "the whole compensation process has been completed" refers to the document having been completed or having already been implemented and paid. The point of completion of the NPP process should be made clearer.	Colombia workshop	no longer relevant
1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	Clarity of the responsible person / grupo to submit the NPP(CB /grower). Demonstrate or complete the process of NPP. If the grower engages towards RSPO certification – restructure the sentence.	English	N/A	TOPP	Not accepted. Not at this section. It is covered in other section.

<p>1.2. Who is responsible for NPP compliance?</p>	<p>Requirements, process, parameters or criteria</p>	<p>el miembro tendrá que seguir de inmediato el Procedimiento de Remediación y Compensación de la RSPO, el cual deberá compartir con la organización ambiental oficial nacional del país a efecto de no permitir que esta unidad se certifique. Comentario: De esta manera tiene sentido la aplicación del punto 1.3, si no cualquier productor opta por la compensación y así se fomenta el abuso de una mala práctica. (es como pedir perdón por el daño realizado)</p>	<p>Spanish</p>	<p>The member must immediately enter into the RSPO Remediation and Compensation Procedure, which must be shared with the country's official national environmental organization to ensure that the unit will not be certified . Comment: In this way paragraph 1.3 makes good sense, unless any grower opts for compensation, thus encouraging malpractice. (it is like apologizing for damage done)</p>	<p>Solidaridad</p>	<p>no longer relevant</p>
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1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	If a company does not adhere to the NPP for new plantings then they should not be able to become certified.	English	N/A	Credit Suisse	Refer to Step 1.3 and announcement on "ENDORSEMENT OF THE NEW PLANTING PROCEDURE (NPP) AND BOG DECISION ON SANCTIONS FOR NON-SUBMISSION OF NPP"
1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	No solo los productores que desean la certificación son responsables sino también los productores asociados o independientes que estén incluidos en el grupo de certificación. Al momento que un miembro del grupo no cumpla con los requisito de remediación y compensación, este puede ser excluido del grupo, y los otros miembro continuar con el proceso? O se afectada toda la unidad?. Se debe crear una guía de certificación de grupo donde se establezca las reglas por las cuales un miembro puede ingresar o egresar del grupo	Spanish	Responsibility rests not only with the growers who want certification but also with the associated or independent growers that are included in the certification group. When a group member fails to comply with the requirement of remediation and compensation, can they be excluded from	Grepalma	where's the relevance to NPP. This is an issue for compensation?

				the group, and the other members continue the process? Or is the entire group affected? Guidance on group certification should be drawn up which sets out the rules governing a member's entry into or exit from the group.		
1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	P 8. Para 3. Yellow highlight Effectively means members can go ahead and not comply with NPP and just seek Compensation process without any censure or actions. They may not get certified at a later stage, but i think this needs to be more strongly worded as it indicates they you can ignore NPP and still take a chance to become certified - this is iot [sic] what RSPO should be encouraging If companies are not following NPP for their new plantings then they should not be RSPO members	English	N/A	HSBC	Accepted. This sentence is misleading as NPP entails more than just HCV assessments. Text on compensation has been removed. Refer to compensation procedure.

1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	Page 8, First sentence. Completing the compensation process needs a long time. How long is the deadline ?, Who is monitoring and evaluating ?	English	N/A	Inti Indosawit Subur	Not accepted based on the above. FYI, no need to complete compensation process for NPP to take place but must at least already submit disclosure to RSPO. Completion is a must only before certification take place.
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1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	The paragraph on smallholders refers to companies who “lead the certification process for scheme smallholders...” etc. We suggest this paragraph starts with referring to the certification document’s scope of the RSPO P&C; mill and supply base. These supply bases can include different types of smallholders. Mills can take the responsibility to lead P&C compliance and NPP compliance alike for the entire supply base, irrespective of the types of smallholders in it. Therefore, the restriction in the quoted line above to “scheme smallholders” should be changed into “(groups of) smallholders”. In Oxfam’s FAIR principles report we argue that it is in the interest of the mills to review company-community relations and take a larger responsibility. FFB legality requirements also may point in the same direction, i.e. going beyond the initial group of scheme smallholders.	English	N/A	Oxfam	Noted but in reality, companies have very little control over independent smallholders (e.g. thailand)
1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	The responsibilities according to time period needs to be clearly defined.	English	N/A	NES Naturaleza	See Section 1.3

1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria	<p>This section also needs to clarify that the proposed compensation procedure is only designed to cover situations where there is no prior HCV assessment before land clearance. The requirement to have a prior HCV assessment is ONLY one of the issues covered by the NPP. Therefore the compensation procedure as proposed is not a way to deal with cases of no NPP having been submitted in its entirety or indeed failure to implement other elements of Principle 7.</p> <p>All cases of failure to follow the NPP must in the first instance be referred to the Complaints Panel and only ion consultation with the Compensation panels should relevant cases be dealt with by them.</p>	English	N/A	WWF	no longer relevant
1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria (RSPO members and non-members)	Bagaimana dengan pekebun non anggota RSPO yang sudah melakukan HCV assessment beserta monitoringnya & pengembangan lahan setelah Januari 2010, kemudian menjadi diakuisisi oleh anggota RSPO apakah perlu melakukan Remediasi & Kompensasi?	Bahasa	What about non-RSPO member grower that has carried out HCV assessment and monitoring, as well as land development, after January 2010 and over the time has been acquired by RSPO member? Should Remediation &	Indonesia workshop	not an NPP issue

				Compensation apply to this case?		
1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria (RSPO members and non-members)	Cas d'un MEMBRE RSPO: Ne pas évoquer la soumission (dernière partie de la phrase), qui doit être faite par le bureau vérificateur et non le membre RSPO (cf. étape 6 p16).	French	In the case of an RSPO member: Do not mention the submission (last part of the sentence), which has to be made by the verification office and not by the RSPO member (see step 6, p16)	Gabon workshop	Noted
1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria (RSPO members and non-members)	Cas d'un NON-MEMBRE RSPO, Cas des Petits Exploitants: L'étude en interne prévoit-elle une étude HVC ? le permis ALS est-il nécessaire ? Quid des accumulations de petites exploitations sur une même zone ?	French	In the case of a non-member RSPO and of smallholders: will the internal study make provisions for an HCV study? Is an ALS license required? What about the concentrations of smallholders in the same area?	Gabon workshop	ALS assessor is always required

1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria (RSPO members and non-members)	<p>Currently there are only 2 cases for non member at the time of clearance.</p> <p>Propose to clearly separate the four cases for non member at the time of clearance: 1/ grower becoming a RSPO member, and 2/ take-over of non-RSPO member by RSPO member, both with two variations: a/ land fully developed, or b/ land still under development. Making two distinct paragraphs and a matrix is highly recommended, as this kind of situation will only be more frequent in the future.</p>	English	N/A	Inti Indosawit Subur	noted
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<p>1.2. Who is responsible for NPP compliance?</p>	<p>Requirements, process, parameters or criteria (RSPO members and non-members)</p>	<p>Pada bagian non member yang mengikuti sertifikasi RSPO: Tidak setuju dengan adanya perbedaan antara non member yang mengikuti sertifikasi dengan non member yang diakuisisi dalam hal:</p> <p>a. non member yang ingin mengikuti sertifikasi hanya perlu mengikuti kompensasi dan remediasi saja, sedangkan non member yang diakuisisi harus melalui prosedur NPP.</p> <p>b. penghentian pembukaan lahan, seharusnya pembukaan lahan tidak dihentikan. Sebaiknya non member yang ikut sertifikasi dan akuisisi mendapat perlakuan yang sama</p> <p>c. penghentian pembukaan lahan sebaiknya tidak dilakukan, proses pembukaan lahan sebaiknya tetap dilanjutkan bersamaan dengan proses verifikasi. Jika pada verifikasi terdapat pelanggaran pemberhentian baru dilakukan.</p> <p>d. penghentian pembukaan lahan hanya dilakukan pada kontrak kerja yang baru, untuk kontrak kerja yang sedang berlangsung sebaiknya diselesaikan terlebih dahulu.</p>	<p>Bahasa</p>	<p>In the section of non-members that follow RSPO certification: . Disagree with the differences between non-members that follow certification and others that are acquired on the following concerns.</p> <p>a. Non-members that want to follow certification are only required to follow compensation and remediation processes, while those acquired need to follow NPP;</p> <p>b. Halt of land clearing. Land clearing should not be halted. Non-members who follow</p>	<p>Indonesia workshop</p>	<p>Reject</p>
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			<p>certification and those are acquired should receive equal treatment;</p> <p>c. Land clearing should not be halted. It should be proceeded along with the verification process. If the verification spots any violation, land clearing can be halted.</p> <p>d. Land clearing should be halted only for new work contracts. For the ongoing ones the land clearing should be let finished first.</p>		
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1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria (RSPO members and non-members)	Sebaiknya klasifikasi tanggung jawab NPP dipisahkan masing- masing, seperti : (1) Anggota RSPO; (2) Pekebun non member kemudian menjadi member RSPO; (3) Pekebun non member kemudian di-takeover oleh pekebun anggota RSPO; dan (4) Petani Kelapa Sawit	Bahasa	Classification of NPP responsibility should be separated from each other, such as by the following: (1) RSPO member; (2) non-RSPO member grower that later on became member; (3) non-RSPO member grower that has been taken over by RSPO member grower; and (4) oil palm smallholder.	Indonesia workshop	Only members need to do NPP. It should also be clear that members with subsidiaries where they have 50% ownership or more or management control, those subs also are subjected to the NPP requirement.
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1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria (RSPO members and non-members)	To remove footnote (Pg 8) - Suggest to merge the second and third bullet where the same requirements will apply for non-members engaging towards RSPO Certification, and for land taken over by RSPO member for land that has been developed after 1st Jan 2010. - Suggestion for rewording: Not an RSPO member at the time of development: If land has been developed after 1st Jan 2010, the grower must first become a RSPO member. If the grower is planning towards RSPO Certification.../ - If land is taken over by RSPO member, they must first enter immediately unto RSPO Remediation and Compensation Procedure followed by NPP for land that has yet to be developed.	English	N/A	Genting Plantations	As above
1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria (RSPO members and non-members)	Not an RSPO member at the time of development: If land has been developed after 1st Jan 2010, the grower must first become a RSPO member. if the grower is planning towards RSPO Certification/or if land is taken over by RSPO member, they must first enter immediately unto RSPO Remediation and Compensation Procedure followed by NPP for land that has yet to be developed.	English	N/A	Malaysia workshop	As above

1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria (RSPO members and non-members)	Suggest to merge the second and third bullet where the same requirements will apply for non-members engaging towards RSPO Certification, and for land taken over by RSPO member for land that has been developed after 1st Jan 2010.	English	N/A	Malaysia workshop	As above
1.2. Who is responsible for NPP compliance?	Requirements, process, parameters or criteria; Scope and focus	<p>Finally the last sentence of this section: At the point of certification, the whole compensation process will have to be completed has not yet been decided on within the compensation procedure so it is probably premature to include it here.</p> <p>If an RSPO member does not comply with the NPP requirements for a new development after January 1st 2010, the member must immediately enter the RSPO Remediation and Compensation Procedure, in order to determine whether the unit can still be certified.</p> <p>Again it needs to be clear that the proposed compensation procedure is only designed to cover situations where there is no prior HCV assessment before land clearance – not other elements of the NPP. All cases must be referred to the Complaints Panel first for consideration.</p>	English	N/A	WWF	As above

1.2. Who is responsible for NPP compliance?	Scope and focus	Pada bagian non member yang mengikuti sertifikasi RSPO: Lingkup pihak yang bertanggung jawab terhadap NPP hanya mencakup grower, sebaiknya stakeholder lain juga masuk kedalam prosedur seperti certification body, complainant, sekretariat RSPO.	Bahasa	In the section of non-members that follow RSPO certification: The scope of parties responsible for NPP only covers grower. Other stakeholders should also be subject to this procedure, such as certification body, complainant, and RSPO secretariat.	Indonesia workshop	noted. Have removed text on non-members
1.2. Who is responsible for NPP compliance?	Smallholders	“If a company leads the certification process for scheme smallholders, then the company is also responsible for ensuring the NPP is complied with and for submitting the NPP notification to the RSPO Secretariat”: For smallholder is the company submit the NPP?	English	N/A	Malaysia workshop	Group manager is responsible if the group manager is the mill then the mill is responsible

1.2. Who is responsible for NPP compliance?	Smallholders	Additional line on independent smallholders	English	N/A	Malaysia workshop	Not understood
1.2. Who is responsible for NPP compliance?	Smallholders	Belum menginformasikan bagaimana untuk smallholder	Bahasa	Yet to inform how it applies to smallholders.	Indonesia workshop	See relevant notes on smallholder
1.2. Who is responsible for NPP compliance?	Smallholders	En el punto de pequeños productores ¿Qué información debe llevar la notificación? ¿Existe un modelo de formato sugerido?	Spanish	In the case of smallholders: what information should the notification comprise? Is there a suggested model format?	Colombia workshop	It is the same as the normal format indicated in Annex 1 & 2
1.2. Who is responsible for NPP compliance?	Smallholders	For bullet 'smallholders', a note is needed to explain the current progress on the inclusion/status of smallholders into the RSPO Remediation and Compensation Procedures	English	N/A	Genting Plantations	should not be in NPP but in compensation documents

1.2. Who is responsible for NPP compliance?	Smallholders	For bullet 'smallholders', a note is needed to explain the current progress on the inclusion/status of smallholders into the RSPO Remediation and Compensation Procedures.	English	N/A	Malaysia workshop	should not be in NPP but in compensation documents
1.2. Who is responsible for NPP compliance?	Smallholders	For the requirements on smallholders to be developed as a separate document for reference by smallholders only and with translation to local languages in the Malaysian context, Bahasa Malaysia.	English	N/A	Malaysia workshop	no separate NPP document but guidance for smallholders will be developed
1.2. Who is responsible for NPP compliance?	Smallholders	For the requirements on smallholders to be developed as a separate document for reference by smallholders only and with translation to local languages in the Malaysian context, Bahasa Malaysia	English	N/A	Genting Plantations	no separate NPP document but guidance for smallholders will be developed

1.2. Who is responsible for NPP compliance?	Smallholders	In many cases, farms are started by smallholders who later sell them to companies. As such, companies interested in buying such plantations should not be made to pay for activities undertaken by the smallholders that go contrary to RSPO's requirements.	English	N/A	Ghana workshop	Yes. Companies are liable
1.2. Who is responsible for NPP compliance?	Smallholders	In Para on Smallholders, the NPP is not relevant to the independent, associate smallholder and outgrower unless they are members of RSPO	English	N/A	Sinar Mas	Agreed.
1.2. Who is responsible for NPP compliance?	Smallholders	In Para on Smallholders, the NPP is not relevant to the independent, associate smallholder and outgrower unless they are members of RSPO.	English	N/A	GAR	Agreed.
1.2. Who is responsible for NPP compliance?	Smallholders	Independent Smallholders should be added for clearer	English	N/A	Thai stakeholders	Not clear

1.2. Who is responsible for NPP compliance?	Smallholders	Jika Smallholder sebagai anggota RSPO, maka jika mereka tidak memenuhi aturan RSPO maka apakah terkena Prosedur RSPO untuk remediasi dan kompensasi, bagaimana mekanismenya?	Bahasa	If a smallholder is an RSPO member and fails to comply with RSPO rules, will RSPO Remediation and Compensation Procedure apply? How the mechanism will work?	Indonesia workshop	Please refer to compensation
1.2. Who is responsible for NPP compliance?	Smallholders	Pada bagian non member yang mengikuti sertifikasi RSPO: Perlu didiskusikan kembali kewajiban smallholder untuk melakukan NPP, karena berat bagi smallholder. Salah satunya biaya untuk audit dan verifikasi.	Bahasa	In the section of non-members that follow RSPO certification: Further discussion is necessary on smallholder obligation to carry out NPP. This is because NPP is difficult to implement due to, among others, the audit and verification costs.	Indonesia workshop	Noted

1.2. Who is responsible for NPP compliance?	Smallholders	Page 8. Smallholders section, second sentence. It stated that if the company lead the certification process for smallholders, they should be responsible for NPP compliance. What is the smallholders do not want to participate in the NPP process?	English	N/A	Inti Indosawit Subur	Smallholders then cannot be members and certified if they refuse to do NPP
1.2. Who is responsible for NPP compliance?	Smallholders	Par 3 –NPP is not relevant for independent, asociate smallholder and outgrower unless they are member of RSPO	English	N/A	Indonesia workshop	Agreed.
1.2. Who is responsible for NPP compliance?	Smallholders	Paragraph 3 – NPP is not relevant for independent, asociate smallholder and outgrower unless they are member of RSPO since company does not have control over them.	English	N/A	Inti Indosawit Subur	Smallholders then cannot be members and certified if they refuse to do NPP
1.2. Who is responsible for NPP compliance?	Smallholders	Saran: RSPO mengakomodasi jika terdapat Smallholders (Scheme) yang tidak bersedia di lakukan NPP	Bahasa	Suggestion: RSPO should accommodate if scheme smallholders are unwilling to implement NPP.	Indonesia workshop	No, cannot

1.2. Who is responsible for NPP compliance?	Smallholders	The RSPO should consider that small producers that are part of a group of certification do not expand their area at the same time and in more than 2 or 5 hectares.	English	N/A	NES Naturaleza	Noted. This needs discussion
1.2. Who is responsible for NPP compliance?	Smallholders	To remove “independent smallholders” in the scope (and to maintain scheme smallholders in the scope).	English	N/A	Malaysia workshop	Reject
1.2. Who is responsible for NPP compliance?	Structure	To remove footnote (Pg 8)	English	N/A	Malaysia workshop	There is no footnote on this page.
1.2. Who is responsible for NPP compliance?	Structure	To shift the clause ‘If an RSPO member does not comply with the NPP requirements for a new development after January 1st 2010, the member must immediately enter the RSPO Remediation and Compensation Procedure, in order to determine whether the unit can still be certified.’ Upwards, above the bullet ‘smallholders’	English	N/A	Genting Plantations	This comment is the same with comments above and the text mentioned will be changed/removed.

1.2. Who is responsible for NPP compliance?	Structure	To shift the clause 'If an RSPO member does not comply with the NPP requirements for a new development after January 1st 2010, the member must immediately enter the RSPO Remediation and Compensation Procedure, in order to determine whether the unit can still be certified.' Upwards, above the bullet 'smallholders'.	English	N/A	Malaysia workshop	This comment is the same with comments above and the text mentioned will be changed/removed.
1.2. Who is responsible for NPP compliance?	Syntax, definitions and terminology	"If land clearing is actively occurring..." – standalone line	English	N/A	Malaysia workshop	Comments not understood.
1.2. Who is responsible for NPP compliance?	Syntax, definitions and terminology	1st line – For clarity it was suggested to rewrite the text : "Whether and how these assessments can be combined and carried out, taking into account national laws and procedures, will be decided by The National Interpretations"	English	N/A	Indonesia workshop	Not accepted. The meaning of the text is still the same.
1.2. Who is responsible for NPP compliance?	Syntax, definitions and terminology	Ease of use: Applicable once clarity of some wordings are provided.	English	N/A	Malaysia workshop	Comments not understood.

1.2. Who is responsible for NPP compliance?	Syntax, definitions and terminology	Feasibility of implementation: Feasibility depends on the clarity of the wordings in the document.	English	N/A	Malaysia workshop	Comments not understood.
1.2. Who is responsible for NPP compliance?	Syntax, definitions and terminology	Phrasing is not clear	English	N/A	Genting Plantations	Comments not understood.
1.2. Who is responsible for NPP compliance?	Syntax, definitions and terminology	Phrasing is not clear.	English	N/A	Malaysia workshop	Comments not understood.
1.2. Who is responsible for NPP compliance?	Syntax, definitions and terminology	Usar la palabra cultivadores en lugar de productores o en su defecto productores de fruto.	Spanish	To use the word "growers" [Spanish: "cultivadores"] rather than "producers" [Spanish: "productores"] or, failing that, "fruit producers".	Colombia workshop	Terms used should follow RSPO P&C.
1.2. Who is responsible for NPP compliance?	Syntax, definitions and terminology	What does it means "Completed" (Page 8 top)?	English	N/A	Malaysia workshop	Noted. Footnote not appearing. To make necessary arrangement.

1.2. Who is responsible for NPP compliance?	Technical clarification (size area)	It's necessary to include an scope of a minimum of hectares need to meet this procedure, or clearly states that from 1 new hectare expansion there is a need of NPP studies.	English	N/A	NES Naturaleza	Noted
1.2. Who is responsible for NPP compliance?	Technical clarification (timeframe)	¿Qué pasa si un pequeño productor sembró independiente después de 2010 y luego se une a un grupo y desea certificarse, como hace el gestor de grupo para asumir la responsabilidad de PNP?.	Spanish	What if a smallholder had started planting independently after 2010 and then later joins a group and wants to be certified: what can the group manager do to take responsibility for NPP?	Colombia workshop	Technically, no sanctions can be given as at the time of clearing, the smallholder is not a member and is not subject to NPP. However, group manager has to check on compensation. The smallholder may have liability.
1.2. Who is responsible for NPP compliance?	Technical clarification (timeframe)	Need to define what is meant by the term 'started' in relation to a new development. Since the NPP is aimed at preventing non-complaint land clearance it should relate to that to avoid letting 'paper' plantations get out of having to submit an NPP: Any land clearing for oil palm and associated developments that started after 1st January 2010. This is to a degree clarified in section 1.3 that includes expansion of existing plantations in the definition of new planting but it would be useful to clarify it here as well.	English	N/A	WWF	Noted. See Table 1. There are a few scenarios in new development, for new acquisition, RSPO may not have liability declaration yet. So companies are required to declare liability to RSPO once the

		<p>Not an RSPO member at the time of development: If land has been developed after January 1st 2010 by a non-RSPO member without complying with the requirements of the NPP –</p> <ul style="list-style-type: none"> • If the grower engages towards RSPO certification: the grower must enter immediately into the RSPO Remediation and Compensation Procedure upon becoming an RSPO member. At the point of certification, the whole compensation process will have to be completed. <p>In fact the proposed compensation procedures require new members to enter into compensation when they join the RSPO – not only when they start to certify their land.</p>				<p>acquisition process is completed. But this does not mean they have to complete compensation process before submitting their NPP. The point here is that they need to continue compensation process and must get it done before any certification can take place. This is because they are companies which have challenging time bound plan and certify plantations which are not yet mature.</p>
<p>1.2. Who is responsible for NPP compliance?</p>	<p>Technical clarification (timeframe)</p>	<p>The term “New plantations” for 2005, 2007, 2010 plantings should be avoid since there are not new.</p>	<p>English</p>	<p>N/A</p>	<p>NES Naturaleza</p>	<p>New planting for 2005 is not in the text. Not accepting.</p>

1.2. Who is responsible for NPP compliance?	Technical detail	Highlight warna biru: - tertulis “menyampaikan pemberitahuan NPP ke sekretariat RSPO” apakah tidak “disampaikan ke CB”? Mohon diklarifikasi.	Bahasa	Blue highlight: - The text is written as ‘submit NPP notification to RSPO secretariat’. Should this be ‘submitted to CB’ instead? Please clarify.	Indonesia workshop	Submit to CB
1.2. Who is responsible for NPP compliance?	Technical detail	Segundo item de No es miembro de la RSPO, donde se especifica cuando un miembro de la RSPO compra el terreno, debería estar ubicado en las aclaraciones para los miembros de RSPO.	Spanish	The second item under “Not an RSPO member”, where it states that the land is being taken over by an RSPO member, should be moved to the clarifications for RSPO members.	Colombia workshop	Noted.

<p>1.2. Who is responsible for NPP compliance?</p>	<p>Technical detail</p>	<p>Suggest changes in red: “If land has been developed after January 1st 2010 by a non-RSPO member without complying with the P&C 7.3 requirements of the NPP” “If the land is taken over by an RSPO member: The same requirements as above apply for any purchase of land purchased converted by a non-RSPO member after January 1st 2010 without complying with the P&C 7.3 requirements of the NPP. NPP is a procedure that encompasses more than HCV assessments (c7.3). It includes CB verification, submission of docs to RSPO, public notification. So ALL non-RSPO members would automatically be non-compliant with NPP. Consistent with first para of introduction 1.1 and with RSPO Compensation and Remediation docs, growers should enter into the compensation process only for non-compliance of P&C 7.3. The current draft penalises non-RSPO members who may even have been adhering to RSPO P&Cs and: - discourages them from joining RSPO - discourages growers from purchasing their land “At the point of certification, the whole compensation process will have to be completed1 “ Text is inconsistent with RSPO Remediation and Compensation docs which says that growers who self-declare non-compliance to P&C 7.3 can : - certify MUs with no liability after LUCA is approved - certify MUs with liability after the compensation plan of the MU is accepted, not after the whole compensation process is completed.</p>	<p>English</p>	<p>N/A</p>	<p>First Resources</p>	<p>NPP is not just about 7.3 and HCV. This is a huge misconception</p>
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1.2. Who is responsible for NPP compliance?	Technical detail	Untuk pekebun yang baru menjadi anggota RSPO, untuk penanaman baru cukup dilakukan REMEDIASI & KOMPENSASI untuk pengembangan lahan tersebut? Atau masih perlu melakukan NPP? Jika melakukan NPP, bukankah itu termasuk NPP Ongoing?	Bahasa	For growers newly accepted as RSPO members, does new planting require only REMEDIATION & COMPENSATION for the land development? Or is it still necessary to carry out NPP? If so, is the NPP not considered ongoing NPP?	Indonesia workshop	NPP may be necessary for uncleared areas, for already developed area, compensation may be required.
1.2. Who is responsible for NPP compliance?	Technical detail	Would like to suggest to add in another category of grower, for those in the process of applying RSPO member, they have to/or encourage to follow the NPP	English	N/A	Sabah Terrestrial Conservation Programme	Noted and accepted.
Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
1.3. When does the NPP apply?	Add more specific detail or explanation	“existing agricultural lands”: Specify and should be in the glossary.	English	N/A	Malaysia workshop	see table 1

1.3. When does the NPP apply?	Add more specific detail or explanation	Challenge and concerns exist where previous land is planted with agricultural crops, yet the High Carbon Stock study (which will be defined later) prohibits new oil palm planting. Second bullet point on 'vegetation clearing for new plantings located within a certified management unit (as these will be audited against the Principle 7 during surveillance or re-certification audits).' needs further clarification i.e. size of parcel, we note that however the necessary documentation is still required as stated in Principle 7, and will be audited by the CB so whether the validity of the HCV assessments of 3 years is still applicable under this clause is referred to or not.	English	N/A	Genting Plantations	3 years validity is only for NPP submission
1.3. When does the NPP apply?	Add more specific detail or explanation	Describir o indicar claramente a que se refiere con desarrollos asociados	Spanish	Describe or clearly indicate what is meant by "associated development".	Grepalma	Accepted. RSPO provide definition in glossary.
1.3. When does the NPP apply?	Add more specific detail or explanation	Especificar el límite de tiempo para realizar los AVC y EISA durante el PNP.	Spanish	Specify the time limit for implementation of the HCV and SEIA during the NPP.	Colombia workshop	Not accepted. For EIA where it is regulated by law, it has to follow the local laws. For HCV, there is no limit set for the assessment, however it must follow the procedures in HCVRN.

1.3. When does the NPP apply?	Add more specific detail or explanation	How does this text “regardless of size” applies?	English	N/A	GAR	RSPO has provided clearer text.
1.3. When does the NPP apply?	Add more specific detail or explanation	In Para 2 on regardless of size, there should be clearer text in defining regardless of size.	English	N/A	GAR	RSPO has provided clearer text.
1.3. When does the NPP apply?	Add more specific detail or explanation	Need to clearly/explicitly state that replanting is not subject to NPP	English	N/A	Ghana workshop	RSPO has provided clearer text.
1.3. When does the NPP apply?	Add more specific detail or explanation	Par 2 - regardless of size. need clarity.	English	N/A	Indonesia workshop	RSPO has provided clearer text.
1.3. When does the NPP apply?	Add more specific detail or explanation	Second bullet point on ‘vegetation clearing for new plantings located within a certified management unit (as these will be audited against the Principle 7 during surveillance or re-certification audits).’ needs further clarification i.e. size of parcel, we note that however the necessary documentation is still required as stated in Principle 7, and will be audited by the CB so whether the validity of the HCV assessments of 3 years is still applicable under this clause is referred to or not.	English	N/A	Malaysia workshop	RSPO provides text to clarify the "size" concern.

1.3. When does the NPP apply?	Add more specific detail or explanation	There is a need for a clear explanation on why there is a requirement on HCV, LUC and socio-environmental impact studies in areas already cultivated.	English	N/A	NES Naturaleza	in Principle 7
1.3. When does the NPP apply?	Add more specific detail or explanation	To add on further details on auditor responsibilities in reviewing HCV through the planning, monitoring and implementation, not the HCV report by the HCV assessor.	English	N/A	Malaysia workshop	Comments not understood because section 1.3 is about when NPP applied. Not accepted.
1.3. When does the NPP apply?	Clarification of area	NPP should not be required for conversion of existing agricultural use, provided that agricultural use was in existence prior to 1st January 2010, and provided that conversion is in compliance with local statutes.	English	N/A	Thai stakeholders	see table 1

<p>1.3. When does the NPP apply?</p>	<p>Clarification of area</p>	<p>Current wording for applicability of NPP (paragraph 2): “ The NPP is applicable in scenarios where new plantings and/or the expansion of existing operations has taken place on existing agricultural lands (excluding those areas already under oil palm), regardless of size”</p> <p>Comment:</p> <ul style="list-style-type: none"> • There should be a clear definition for expansión, whether it is by land size, infrastructure, manpower, etc. • Land cultivated with agricultural crops other than oil palm should be regarded as replanting/conversion of land to crop land • The wording regardless of size is impractical as it might cause NPP to be conducted more than once and additional cost and time needed. Especially for case when company has submitted years ago for a unit where expansion currently takes place, it’s impractical to carry out numerous NPP, incur additional time and costs, and going through a complete process of NPP every time the community wants land conversion (say 20ha); <p>Hence the proposed wording for applicability of NPP (paragraph 2): “ The NPP is applicable in scenarios where new plantings and/or the expansion of existing operations has taken place on land not previously planted with oil palm or other agricultural land”</p>	<p>English</p>	<p>N/A</p>	<p>Musim Mas</p>	<p>see table 1</p>
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1.3. When does the NPP apply?	Clarification of area	<p>Furthermore, where an NPP has already been submitted for a given unit, and the total area was not converted at the time of the NPP submission, subsequent new plantings within this area concerned by the original NPP submission will no longer be subjected to further NPP requirements.</p> <p>Exceptions to this rule should be made for areas where the assessments have been deemed to have expired (see Step 3). This exception should have the same time limit as the assessments that it is based on. We are suggesting 1 year.</p>	English	N/A	WWF	Not accpeting this comment. Validity period for assessments are for new development and not certified development that have done NPP before.
1.3. When does the NPP apply?	Clarification of area	Kebun sawit terlantar yang beregenerasi tidak perlu dilakukan NPP	Bahasa	Abandoned oil palm plantation that is regenerating does not require NPP.	Indonesia workshop	see table 1
1.3. When does the NPP apply?	Clarification of area	NPP should be applied for land conversion from Forest to Oil Palm	English	N/A	Thai stakeholders	see table 1
1.3. When does the NPP apply?	Clarification of area	P 8. Para 5. Blue highlight add the words as follows "(excluding those areas already under oil palm, except as in the situations as detailed below)	English	N/A	HSBC	noted

1.3. When does the NPP apply?	Clarification of area	Setelah perusahaan mendapatkan izin lokasi sejak Januari 2010. Apabila perusahaan telah melakukan NPP sesuai izin lokasi dan belum berhasil dibuka seluruhnya, maka untuk pembukaan selanjut tidak perlu NPP lagi dengan syarat tidak mengurangi HCV area	Bahasa	After company obtained location permit as of January 2010: if the company has carried out NPP according to the location permit but the lands have not been completely cleared, no NPP will be required for the next land clearing insofar as the clearing does not reduce the size of HCVAs.	Indonesia workshop	if the clearing is within the scope of the original NPP then no, a new npp is not needed
1.3. When does the NPP apply?	Clarification of area	The NPP is applicable in scenarios where new plantings and/or the expansion of existing operations has taken place on existing agricultural lands (excluding those areas already under oil palm), regardless of size.	English	N/A	Malaysia workshop	see table 1

<p>1.3. When does the NPP apply?</p>	<p>Clarification of area; Requirements, process, parameters or criteria</p>	<p>The NPP is applicable in scenarios where new plantings and/or the expansion of existing operations has taken place on existing agricultural lands (excluding oil palm), regardless of size.</p> <p>Our opinion : NPP should not be required for conversion of existing agricultural use, provided that agricultural use was in existence prior to 1st January 2010, and provided that conversion is in compliance with local statutes.</p> <p>Reasons</p> <p>1- Conversion from existing agricultural use is mostly a small-holder issue (from rubber, coconuts, cattle grazing etc) RSPO should not be erecting NPP barriers to such conversion.</p> <p>2- The new NPP requirements do not apply if a grower decides to replant his or her old oil palms with a new generation of oil palms.</p> <p>But, if he or she decides to replace their old rubber or coconuts with oil palms they will be required by NPP to prepare ;</p> <p>Land Use Change Analysis</p> <ul style="list-style-type: none"> - Social & Environmental Impact Assessment * - High Conservation Value Assessment * - Soil suitability survey - Green House Gas Assessment <p>This is a hugely unproductive (and unsustainable) imposition, which cannot be explained rationally.</p> <p>* Note :For land areas of less than 500 ha an internal assessment using selected components of SIEA and HCV assessments can be used (see RSPO 7.1) Our Opinion : If a small holder, or any oil palm grower,</p>	<p>English</p>	<p>N/A</p>	<p>Thai stakeholders (Univanich)</p>	<p>see table 1</p>
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		<p>decides to convert from another well established agricultural use, they should not require NPP approval in any shape or form, provided that conversion complies with local statute requirements.</p> <p>3- This is not a minor issue. Small growers make up a very significant part of the global palm oil industry. Many have practiced mixed cropping over generations. It is an unnecessary and apparently irrational barrier for RSPO to insist that any growers switching crops to oil palm must comply with NPP.</p>				
1.3. When does the NPP apply?	Internal consistency	Challenge and concerns exist where previous land is planted with agricultural crops, yet the High Carbon Stock study (which will be defined later) prohibits new oil palm planting.	English	N/A	Malaysia workshop	Noted

<p>1.3. When does the NPP apply?</p>	<p>Internal consistency</p>	<p>Suggest the changes in red: “The NPP is applicable in scenarios where new plantings and/or the expansion of existing operations is taking place has taken place on existing agricultural lands (excluding those areas already under oil palm), regardless of size.” The yellow highlight may contradict the definition of New Planting in the glossary (defined as development on land on which no work has commenced before 1 Jan 2010). If there are operations existing before 1 Jan 2010, NPP should not be applicable for the on-going planting. Would also suggest adding a third bullet point, for clarity, to cases when NPP does not apply: · When oil palm planting is taking place on land whose approval for developing land was acquired before cut-off date or where some work had commenced before cut-off date and where there is no replacement of primary forest and HCV areas (C7.3)</p>	<p>English</p>	<p>N/A</p>	<p>First Resources</p>	<p>Text has changed</p>
<p>1.3. When does the NPP apply?</p>	<p>Requirements, process, parameters or criteria</p>	<p>¿Por qué debo hacer un PNP, si se hace el cambio de uso de actividad agrícola (sin afectar bosques)? ¿Si es una expansión de una plantación ya existente, porque debo aplicar PNP?</p>	<p>Spanish</p>	<p>Why should I do an NPP, if a change of use of agricultural activity is being made (which does not affect forests)? If it is an expansion of an already existing plantation, why</p>	<p>Colombia workshop</p>	<p>see table 1</p>

				do I have to apply an NPP?		
1.3. When does the NPP apply?	Requirements, process, parameters or criteria	Agriculture land conversion – why need NPP?	English	N/A	Malaysia workshop	see table 1
1.3. When does the NPP apply?	Requirements, process, parameters or criteria	Como Regular esto, ya que se sigue sembrando en areas que no deberia,	Spanish	How to regulate this issue, as planting is continuing in areas where it should not take place,	Jaremar	Comments not understood. Planting cannot be in areas where it should not take place.
1.3. When does the NPP apply?	Requirements, process, parameters or criteria	Perlu ditambahkan satu opsi lagi unit yang belum tersertifikasi tetapi telah melakukan HCV assessment pada konsesinya tidak perlu melakukan NPP.	Bahasa	2. Another option should be added: unit that is yet to be certified but has already carried out HCV assessment in its concession is not required to carry out NPP.	Indonesia workshop	Reject

1.3. When does the NPP apply?	Requirements, process, parameters or criteria	Propose to add in 1 more case for the condition where Growers do not need to follow NPP requirements (paragraph 3) namely : “Non-certified units which have conducted HCV assessment for the concession are not required to submit NPP for patches of new development within the units as these units will have already adhered to Criterion 7.3 of the P&C and will be audited during the P&C certification”.	English	N/A	Musim Mas	Reject
1.3. When does the NPP apply?	Requirements, process, parameters or criteria	Quid des pépinières ? considérées comme « développement associé », une procédure spécifique (en phase avec la réglementation nationale en vigueur) doit exister pour permettre leur mise en place en amont du processus. Dans le cas contraire, perte d’une année sur la mise en œuvre, et perte de la dynamique insufflée au niveau des communautés locales.	French	What about the nurseries? Considered as "associated development", a specific procedure (in line with existing national regulations) is needed to allow their set up upstream of the process. Otherwise, it means a loss of one year in the implementation process, and a loss of momentum at the local	Gabon workshop	No activities allowed including nurseries.

				community level.		
1.3. When does the NPP apply?	Requirements, process, parameters or criteria	The suggestion is to eliminate the need of NPP studies in expansion where land was already cultivated	English	N/A	NES Naturaleza	see table 1
1.3. When does the NPP apply?	Requirements, process, parameters or criteria	Usul dari grower: - Tidak perlu ada NPP untuk lahan yang dibebaskan di atas lahan pertanian (selain kelapa sawit) di dalam ijin/HGU perusahaan, karena isu-isu pokok terkait sudah tercantum di dalam AMDAL, SEIA, dan HCV Assessment. NGO menyatakan tidak ada masalah dengan 1.3 termasuk terkait dengan di atas lahan pertanian.	Bahasa	Suggestion from growers: - There is no need of NPP for land released on agricultural land (except oil palm) in company permit/land permit because related main issues are already covered in AMDAL, SEIA, and HCV assessments. NGO stated that there is no problem with point 1.3, including what is related to being on	Indonesia workshop	see table 1

				agricultural land.		
1.3. When does the NPP apply?	Requirements, process, parameters or criteria	Why such a big investment is needed in areas already affected. That will limit the investment of small growers and others.	English	N/A	NES Naturaleza	
1.3. When does the NPP apply?	Requirements, process, parameters or criteria (national legality)	Pada peraturan Indonesia sudah mengatur AMDAL, UKL-UPL, yang mencakup publik konsultasi, apakah diwajibkan dilakukan NPP?	Bahasa	Indonesian regulations already rule AMDAL and UKL-UPL that require public consultation. Is NPP still required?	Indonesia workshop	Agreed.
1.3. When does the NPP apply?	Requirements, process, parameters or criteria; Clarification of area	Paragraph 2. There's no need for company to undergo NPP over conversion plant (e.g. rubber, cocoa) which located within company concession / under company management which already been assessment with EIA, SEIA and HCV assessment.	English	N/A	Inti Indosawit Subur	see table 1

<p>1.3. When does the NPP apply?</p>	<p>Requirements, process, parameters or criteria; Clarification of area</p>	<p>El PNP aplica en situaciones en las que existe la intención de establecer nuevas plantaciones y/o la intención de expandir las operaciones existentes en terrenos agrícolas existentes (no de vocación forestal) independientemente de su tamaño.</p> <p>COMENTARIOS: La expansión de nuevas plantaciones debe ser en terrenos ya despejados (uso ganadero u otros cultivos) y no en tierras nuevas con bosques primarios aunque estén degradados.</p> <p>Los productores no tienen por qué seguir los requisitos del PNP en el caso de:</p> <ul style="list-style-type: none"> • plantación de palma de aceite en plantaciones existentes de palma de aceite – excepto en el caso de una plantación abandonada donde el bosque secundario ha regenerado y pudieran estar presentes AVC; o existan impactos sociales relevantes que atentan los derechos humanos de las comunidades. Además, cuando ya se ha presentado un PNP para una unidad determinada, y el área total no se convirtió en el momento de la presentación del PNP, las nuevas plantaciones subsiguientes dentro de esta área incluida en la presentación original del PNP si deben de estar sujetas a los requisitos del PNP (estas transiciones pueden durar años y en esa temporalidad generar razones para proteger esas nuevas áreas). 	<p>Spanish</p>	<p>The NPP is applicable in scenarios where there is an intention of establishing new plantings and/or the intention of expanding existing operations in existing agricultural land (non-forest land) regardless of size.</p> <p>COMMENTS: The expansion of new plantations must be in already cleared land (for livestock use or other crops) and not in new land with primary forests even if these forests are degraded.</p>	<p>Solidaridad</p>	<p>see table 1</p>
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			<p>Growers need not follow the requirements of the NPP in the case of:</p> <ul style="list-style-type: none">• oil palm to oil palm plantings – except in the case of an abandoned plantation where secondary forest has regenerated and potential HCVs may be present; or where there would be relevant social impacts that would encroach on the human rights of the communities. Furthermore, where an NPP has already been submitted for a given unit, and the total area was not converted at the		
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				time of the NPP submission, subsequent new plantings within this area concerned by the original NPP submission should remain subject to the NPP requirements (these transitions can take years, during which time reasons could well arise for the need to protect these new areas).		
1.3. When does the NPP apply?	Smallholders	Bagaimana dengan petani swadaya? Apakah juga akan Berlaku?sementara ada beberapa bagian yang pada P&C RSPO tidak diberlakukan bagi petani swadaya. Selain itu, P&Cuntuk petani swadaya belum juga di selesaikan.	Bahasa	What about independent smallholder? Will it also apply to them? Whereas, several parts in RSPO P&C do not apply to them. In	Setara Jambi	NPP applies to smallholders

				addition, P&C for independent smallholder is also waiting for completion.		
1.3. When does the NPP apply?	Smallholders	Khusus smallholder jika lokasinya berada di dalam izin lokasi pada saat NPP dan telah include di dalam NPP assessment, maka next kedepannya pada saat Penanaman tidak perlu dilakukan NPP lagi	Bahasa	Particularly for smallholders, if their locations are within the location permit concession at the time the NPP is being carried out and have been included in the NPP assessment, no NPP should be carried out anymore in the future planting.	Indonesia workshop	NPP applies to smallholders
1.3. When does the NPP apply?	Syntax, definitions and terminology	The term 'vegetation clearance' is used in this section – but is not defined in the glossary. However it is defined as part of 'land preparation'. I suggest that the term "and preparation' is used instead and consistently in the document.	English	N/A	WWF	Accept. Will ensure consistency.

1.3. When does the NPP apply?	Technical clarification (size area)	Paragraph 2. Regardless of size needs more clarity. It is not feasible for company to conduct NPP for small hectares of land. In reality, if there's any enclave, usually the land is in small area.	English	N/A	Inti Indosawit Subur	NPP applies - text has been added
1.3. When does the NPP apply?	Technical clarification (size area)	Range luasan yang dikonversi, sebaiknya diperjelas, misalnya untuk luasan > 3,000 ha.	Bahasa	The range of size of areas size to be converted should be made clear (e.g. for area > 3,000 hectares).	Indonesia workshop	NPP always required regardless of size
1.3. When does the NPP apply?	Technical clarification (size area)	Sebaiknya ada standar angka luasan atau persentase dari konsesi yang perlu melakukan NPP, kecuali sudah ada HCV assessment.	Bahasa	1. Area size or percentage out of the entire concession should be standardised for which NPP is required, unless an HCV assessment is already carried out.	Indonesia workshop	NPP always required regardless of size

1.3. When does the NPP apply?	Technical clarification (size area)	The RSPO P&C defines a base of 500 ha exempts from HCVA. However, in the Indonesian NI, it was declared that independent assessment is for > 3000 ha.	English	N/A	GAR	HCV always required in NPP
1.3. When does the NPP apply?	Technical clarification (size area)	We propose the size of area for HCVA and SEIA be referred to the RSPO NI of each countries.	English	N/A	GAR	noted.
1.3. When does the NPP apply?	Technical clarification (timeframe)	Aclarar las fechas límites que aplican en este documento (fechas límites del 2005 o el 2010 y su compensación, o referencia cruzada con ese documento), teniendo en cuenta que va a ser base de trabajo para personas que pueden no conocer muy bien el sistema RSPO.	Spanish	Clarify the deadlines that apply in this document (deadlines of 2005 or 2010 and their compensation, or cross-reference to that document), bearing in mind that it will be a working basis for persons who are not very familiar with the RSPO system.	Colombia workshop	noted

1.3. When does the NPP apply?	Technical clarification (timeframe)	La fixation de l'âge minimum de l'abandon est importante pour décider de la non application aux exigences du NPP	French	Setting the minimum age of an abandoned plantation is important to consider the non-compliance with the requirements of the NPP	Gabon workshop	3 years for abandoned plantations - see table 1
1.3. When does the NPP apply?	Technical clarification (timeframe)	Saran: 1 Tahun setelah RSPO NPP ditetapkan oleh BOG.	Bahasa	Suggestion: 1 year after RSPO NPP is approved by the BoG.	Indonesia workshop	Not accepted. Grace period provided is 6 months.

<p>1.3. When does the NPP apply?</p>	<p>Technical clarification (timeframe)</p>	<p>The NPP is applicable in scenarios where new plantings and/or the expansion of existing operations has taken place on existing agricultural lands (excluding those areas already under oil palm), regardless of size.</p> <p>WWF welcome the clarification that expansion of existing operations is also included in new development requiring an NPP.</p> <p>However the rehabilitation of old, inactive or abandoned oil palm plantations should be included as new developments requiring an NPP. The regeneration of semi-natural vegetation with associated environmental and social values occurs rapidly in abandoned oil palm plantations. Such areas must not automatically be considered as ‘existing’ oil palm plantations. The permissible time period within which an ‘old plantation’ can still be considered as not requiring an NPP should equal the ‘expiry’ time for existing assessments (as set out in Step 3). WWF proposes a period of 1 year only.</p>	<p>English</p>	<p>N/A</p>	<p>WWF</p>	<p>1 year is rejected</p>
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1.3. When does the NPP apply?	Technical detail (national legality)	Checking with National legal in each Country. There are different regulation for land-use.	English	N/A	Thai stakeholders	Comments not understood. NPP is a generic/global document. Will not specify national laws in the procedures.
1.3. When does the NPP apply?	Technical detail (soil)	Soil and topography map should not be tied to the three year validity as these maps are usually referenced over a long period of time.	English	N/A	Genting Plantations	Agree and accept
1.3. When does the NPP apply?	Technical detail (soil)	Soil and topography map should not be tied to the three year validity as these maps are usually referenced over a long period of time.	English	N/A	Malaysia workshop	Agree and accept
1.3. When does the NPP apply?	Wildlife	Bullet point 1 is really important as we have found that abandonee oil palm does become a potential patch for wildlife travelling through the plantation	English	N/A	Hutan	noted
Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
1.4. How is the NPP implemented?	Add more specific detail or explanation	"competent independent assessors": provide more guidance for both NPP assessor and CB assessor	English	N/A	Malaysia workshop	Current text is sufficient

1.4. How is the NPP implemented?	Add more specific detail or explanation	Footnotes to be included. To indicate the different categories and roles of assessors in the RSPO process e.g. HCV, CB and ASI	English	N/A	Malaysia workshop	See Figure 1
1.4. How is the NPP implemented?	Add more specific detail or explanation	Penjelasan terkait izin yang dimaksud pada baris keempat paragraph kedua	Bahasa	Explanation concerning licence/permit at the fourth line of the second paragraph.	Indonesia workshop	RSPO will provide explanation.
1.4. How is the NPP implemented?	Add more specific detail or explanation	Pertanyaan dari grower: - Apakah internal lead asesor juga memerlukan ALS? Tidak dijelaskan sehingga perlu di elaborasi dalam panduan	Bahasa	Question from growers: - Does internal lead assessor also require ALS? This is not explained so it needs to be elaborated in the guidance.	Indonesia workshop	Only for Indonesia NI - it explicitly says yes. No for others
1.4. How is the NPP implemented?	Add more specific detail or explanation	Saran: Perlu dijelaskan dan ditegaskan dalam prosedur NPP ntuk remaining area yang walaupun sudah masuk didalam scope NPP sebelumnya tidak memerlukan NPP kembali.	Bahasa	Suggestion: The NPP procedure needs to explain and confirm that no new NPP need to be carried out again for the remaining areas	Indonesia workshop	RSPO have explained in the procedures.

				which have already been included in the previous NPP scope.		
1.4. How is the NPP implemented?	Add more specific detail or explanation	Since the word assessor is frequently used, there should be a footnote to clearly indicate the various type and roles of assessors e.g. ; ASI, HCV, RSPO etc.	English	N/A	Malaysia workshop	Agree and accept
1.4. How is the NPP implemented?	Clarification of area	Saran: Untuk area yang akan di assessment SEIA & HCV tidak dibatasi luasan (< 500 Ha), namun merujuk pada NI (National Interpretation) masing-masing negara yang sudah di Endorsed oleh RSPO BOG.	Bahasa	Suggestion: Limitation should not apply to the size of areas to be assessed with SEIA and HCV assessment (<500 hectares); but rather, it should refer to each country's National Interpretation (NI) that has been endorsed by the BoG.	Indonesia workshop	Refer to section 1.5 and Table 2.

1.4. How is the NPP implemented?	External consistency	Kalimat “untuk luasan lahan....beberapa tahap pengajuan NPP” Sebaiknya dihilangkan karena sudah tercakup di RSPO P&C	Bahasa	This paragraph: “For land areas less than....several NPP submission phases” should be removed because it is already covered in RSPO P&C.	Indonesia workshop	RSPO have explained in the procedures.
1.4. How is the NPP implemented?	Internal consistency	P9 Sec 1.4 Para 2 Blue "selected components" - should this be a "specific" or "a limited number of..." Example quotes are area of 1000 hectares, but the limited scope Internal assessment is only valid up to 500 ha. This does not make sense - replace the 1000 with 500	English	N/A	HSBC	reject
1.4. How is the NPP implemented?	Requirements, process, parameters or criteria	Paragraph 2. Last sentence. To add “Land development cannot be separated into several NPP submission phase, unless there are justifiable reason.”	English	N/A	Inti Indosawit Subur	Not accepted.
1.4. How is the NPP implemented?	Requirements, process, parameters or criteria	Especificar mejor que por requisitos NACIONALES, para un consultor independiente, se entiende son los requisitos legales aplicables.	Spanish	Specify more clearly that, for an independent consultant, it is of course the NATIONAL	Colombia workshop	No need to explain. It is clear that local law applies.

				requirements which are the applicable legal requirements.		
1.4. How is the NPP implemented?	Requirements, process, parameters or criteria	Los requisitos para que se implementen, son muy caros, los pequeños productores son los que están convirtiendo el uso de suelo en palma , debería ser que las evaluaciones a excepción de la parte legal (EIA) SE REALIZADA POR TECNICOS E LAS EMPRESAS, PARA QUE SEA MAS VIABLE Y SE PUEDA ORDENAR UN POCO EL MAL PROCESO DE SIEMBRA EN LATINOAMERICA	Spanish	The implementation requirements are very costly, and as smallholders are the ones converting land use to oil palm, assessments – except those made for legal purposes (EIAs) – should be carried out by technicians and companies, to ensure that they are more reliable and to introduce a small measure of order into the imperfect planting process in Latin America	Jaremar	Noted.

1.4. How is the NPP implemented?	Requirements, process, parameters or criteria	Mapping by GPS or shape file adequate for smallholders	English	N/A	Thai stakeholders	Agreed.
1.4. How is the NPP implemented?	Requirements, process, parameters or criteria	Recommander une observation indépendante par un membre du RSPO ou la société civile de tout le processus d'évaluation par l'évaluateur indépendant	French	Recommend an independent monitoring conducted by a member of RSPO or from civil society on the entire evaluation process performed by the independent assessor.	Gabon workshop	reject
1.4. How is the NPP implemented?	Requirements, process, parameters or criteria	Revisar los requisitos de competencia para evaluadores internos competentes pues parecen ser más exigentes que para un evaluador externo.	Spanish	Review the competency requirements for competent internal assessors since they appear to be more demanding than those for external assessors.	Colombia workshop	see table 2

1.4. How is the NPP implemented?	Requirements, process, parameters or criteria	Sebaiknya NPP bisa dilakukan bertahap. Dasarnya, adalah penggunaan lahan untuk pengembangan masih bisa berubah terkait dengan perubahan izin.	Bahasa	NPP should be carried out in stages. The rationale is that land use for development is still subject to change in relation to the licence/permit changes.	Indonesia workshop	See Section 1.5
1.4. How is the NPP implemented?	Requirements, process, parameters or criteria	The delay on on-going plantations can occur because of financing, climate issues, political issues. So when external factors affect the new planting then it should be an option to update the procedure.	English	N/A	NES Naturaleza	see relevant points on on-going planting
1.4. How is the NPP implemented?	Smallholders	Cuando se trata de pequeños productores atomizados o dispersos, ¿Se puede tener la opción de evaluaciones internas para los estudios de AVC y EISA (así sumen más de 500 ha)?	Spanish	What about smallholders who are working on their own or dispersed, can they have the option of making internal assessments for HCV and SEIA studies (that	Colombia workshop	See Table 2 and Box 1.

				total more than 500 ha)?		
1.4. How is the NPP implemented?	Smallholders	It is highly unlikely that smallholders would have the necessary technical expertise or capacity to be able to manage the NPP process in its full detail. The selected components of the SEIA and HCV assessment that can be used for smallholders as stated in the explanatory notes under 1.4 should be clearly elaborated	English	N/A	Ghana workshop	See Table 2 and Box 1.
1.4. How is the NPP implemented?	Smallholders; Technical clarification (size area)	Bagaimana dengan petani-petani individu yang berencana melakukan penanaman baru sebesar 400 Ha? Dan bagaimana pula dengan petani swadaya yang akan menanam baru seluas 1-2 ha, apakah juga harus membuat SEIA internal? Apakah SEIA untuk lahan diatas 500 Ha memiliki persyaratan sendiri? Misalnya dalam 1 hamparan? Disini tidak disebut persyaratan untuk luasan dan karakteristik yang harus lakukan SEIA, baik oleh internal dan eksternal.	Bahasa	What about individual smallholders who plan for new development on lands of 400 hectares? And what about independent smallholders who are to carry out new planting on lands of 1-2 hectares? Are they also required to	Setara Jambi	See Table 2 and Box 1.

				prepare internal SEIA? Does SEIA for lands above 500 hectares have particular requirements? E.g. in one single plot? Here there is no mention of the size and characteristics of areas for which SEIA, both internal and external, is required.		
1.4. How is the NPP implemented?	Syntax, definitions and terminology	Jangan disebutkan Internal Assessment, namun menyebutkan Assessor yang kompeten / ALS.	Bahasa	Do not use this term: Internal Assessment. Instead, use this: competent Assessor / ALS	Indonesia workshop	accept where applicable
1.4. How is the NPP implemented?	Syntax, definitions and terminology	The word 'assessors' is commonly used	English	N/A	Malaysia workshop	Accepted. In other sections, more specific assessor term will be used.
1.4. How is the NPP implemented?	Technical clarification (size area)	Apa dasarnya membatasi 500 Ha untuk dilakukan kajian internal tentang SEIA dan HCV.	Bahasa	What is the rationale for the 500-ha threshold for	Indonesia workshop	from generic P&C

				internal SEIA and HCV assessment?		
1.4. How is the NPP implemented?	Technical clarification (size area)	Apabila areal < 500 ha masih memerlukan NPP atau tidak ?	Bahasa	Is NPP still required for areas of < 500 hectares?	Indonesia workshop	Agreed.

<p>1.4. How is the NPP implemented?</p>	<p>Technical clarification (size area)</p>	<p>Current wording for implementation of NPP (paragraph 2): “For land areas less than 500 ha, an internal assessment using selected components of SEIA and HCV assessments can be used (see RSPO 7.1 and 7.3) The final area considered in the assessment must be calculated based on the permit or land deed to which the NPP will apply (i.e. total area considered for palm oil development). For instance if the permit is for 1000 ha of land, an NPP should be submitted covering the 1000 ha. Land development cannot be separated into several NPP submission phases” Comment: • Propose to omit last sentence in paragraph 2, because it is potentially confusing.</p> <p>Propose to revise paragraph 2: “For land areas less than 500 ha, an internal assessment using selected components of SEIA and HCV assessments can be used (see RSPO 7.1 and 7.3. The final area considered in the assessment must be calculated based on the permit or land deed to which the NPP will apply (i.e. total area considered for palm oil development). For instance if the permit is for 1000 ha of land, an NPP should be submitted covering the 1000 ha.”</p>	<p>English</p>	<p>N/A</p>	<p>Musim Mas</p>	<p>Accept this edit "For instance if the permit is for 1000 ha of land, an NPP should be submitted covering the 1000 ha."</p>
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1.4. How is the NPP implemented?	Technical clarification (size area)	<p>For land areas less than 500 ha, an internal assessment using selected components of SEIA and HCV assessments can be used (see RSPO 7.1 and 7.3).</p> <p>This provision in P&C 2013 ONLY covers 7.1 and NOT 7.3. The reference to 7.3 should be removed. And in the case of 7.1 it ONLY covers situations where the in no national interpretation. This should be made clear in this text to ensure that it does not alter to provisions of the P&Cs.</p>	English	N/A	WWF	Refer to Table 2.
1.4. How is the NPP implemented?	Technical clarification (size area)	Less tan 500 ha.can use internal assesment (the requirements should be added into this document also)	English	N/A	Thai stakeholders	more detail has been added - see Table 2
1.4. How is the NPP implemented?	Technical clarification (size area)	Paragraph 2. First sentence. The number of 500 ha is contradicted with draft Indonesian National Interpretation (3,000 ha). Should state reference to each country's National Interpretation..	English	N/A	Inti Indosawit Subur	see relevant notes on this issue

1.4. How is the NPP implemented?	Technical clarification (size area)	<p>Range luasan untuk melakukan kajian sendiri sebaiknya ditingkatkan menjadi 3,000 ha, dasarnya adalah ketika melakukan kajian UKL- UPL juga dengan batas 3,000 ha, dan tidak diwajibkan dilakukan oleh person yang telah diakui oleh Komisi AMDAL.</p>	Bahasa	<p>The development area threshold for internal assessment should be increased to 3,000 hectares. The rationale is that UKL-UPL assessment also uses this threshold (3,000 ha) and that such assessment is not required to be carried out by individuals that have been approved by AMDAL Commission.</p>	Indonesia workshop	see relevant notes on this issue
1.4. How is the NPP implemented?	Technical clarification (size area)	<p>The limit of the areas, whereas HCV and SEIA, may be assessed internally shall be based upon each national inptertation.</p>	English	N/A	First Resources	see relevant notes on this issue

1.4. How is the NPP implemented?	Technical clarification (size area)	The RSPO P&C defines a base of 500 ha exempts from HCVA. However, in the Indonesian NI, it was declared that independent assessment is for > 3000 ha. So we propose a size of area HCVA and SEIA should be refer to NI each countries of RSPO Members	English	N/A	Sinar Mas	see relevant notes on this issue
1.4. How is the NPP implemented?	Technical clarification (size area); External consistency	Angka 500 ha bertentangan dengan draft NI Indonesia yang menyatakan angka (threshold) 3000 ha	Bahasa	Figure of 500 ha contradicts with Indonesia's NI draft which states a figure (threshold) of 3000 ha	Indonesia workshop	see relevant notes on this issue

<p>1.4. How is the NPP implemented?</p>	<p>Technical detail</p>	<p>Con el fin de cumplir con los requisitos del PNP, los productores son responsables de seleccionar y nombrar evaluadores independientes competentes (certificados por con licencia del Programa de Licencias para Asesores de la Red de Recursos de AVC) y compartir dichos planes con las organizaciones estatales correspondientes (Ministerios de Agricultura, Medio Ambiente y Oficinas Forestales) para definir si están en las áreas correctas.</p>	<p>Spanish</p>	<p>In order to comply with NPP requirements growers are responsible for selecting and appointing competent independent assessors (certified with a license from the HCV Resource Network Assessor Licensing Scheme) and for sharing those plans with the corresponding state organizations (Ministries of Agriculture and Environment and the Forestry Offices) to determine whether they are in the correct areas.</p>	<p>Solidaridad</p>	<p>Not accepted. Assessor terms here are not only for HCV.</p>
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1.4. How is the NPP implemented?	Technical detail (national legality)	In the Malaysian context, there are circumstances where local development does not recognise SEIA, in this event the legally recognised EIA should suffice in place of a SEIA	English	N/A	Malaysia workshop	No. The company will then need to do an SIA to add to the EIA.
1.4. How is the NPP implemented?	Technical detail (national legality)	In the Malaysian context, there are circumstances where national/state requirement does not recognise SEIA, in this event the legally recognised EIA should suffice in place of a SEIA.	English	N/A	Genting Plantations	No. The company will then need to do an SIA to add to the EIA.
1.4. How is the NPP implemented?		It is an option that should exist in to the document	English	N/A	NES Natureleza	Comments not understood.
Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
1.5. Integration of NPP processes with national legal processes	Add more specific detail or explanation	"NPP can be initiated..... not dependent on the completion of those legal processes.": Please provide more clarification on can be initiated.	English	N/A	Malaysia workshop	This section has been revised

1.5. Integration of NPP processes with national legal processes	Add more specific detail or explanation	Addendums to be issued accordingly such as the case for Indonesia. To include cases for Malaysia e.g. Peninsular, Sabah & Sarawak?	English	N/A	Malaysia workshop	reject. Too specific
1.5. Integration of NPP processes with national legal processes	Add more specific detail or explanation	Clarifier les exigences de la soumission de la PNP. Les travaux réalisés dans la cadre des exigences juridiques nationales doivent-ils être achevés ou approuvés ? La différence du pas de temps est très significative, car l’approbation peut prendre plusieurs mois	French	Clarify the requirements for the NPP submission. Does the work carried out in the framework of the national legal requirements need to be completed or approved? The difference in terms of time required is very significant because approval can take several months	Gabon workshop	please see relevant notes on this

1.5. Integration of NPP processes with national legal processes	Add more specific detail or explanation	Dentro del P&C 2.1.2 se incluirá el tema que aplique legalmente para el PNP.	Spanish	To include within P&C 2.1.2 the issue that has legal application for the NPP .	Grepalma	Comments not understood.
1.5. Integration of NPP processes with national legal processes	Add more specific detail or explanation	National legal requirement can be further enhance in details not only focusing Indonesia, what about Malaysia e.g. Sabah & Sarawak?	English	N/A	Malaysia workshop	reject. Too specific
1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria	Current wording for integration of NPP process with national legal process (paragraph 1): “The National Interpretations will decide whether and how these assessments can be combined and carried out, taking into account national laws and procedures” Proposed revisión: “As the scope of NI may not able to be determined by exact at this stage. RSPO will allow flexibility for RSPO-NITF to study and determine areas where potential conflicts occur in national context. These can be issued as addendum to the NI”.	English	N/A	Inti Indosawit Subur	please see relevant notes on this

1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria	For the RSPO process to be successful, government agencies should be introduced to, and engaged in the RSPO certification and NPP processes. Understanding the RSPO timelines might prompt these agencies to process permits in a timely manner. An intermediary body for oil palm producers could also be set up to intervene in some processes	English	N/A	Ghana workshop	Noted
1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria	HCV & SIA Assessment in Indonesia can be conducted by internal assessor (based on Ministry of Environmental Regulation No 12 Year 2012), with area less than 3,000 Ha (as a minimum figure for landscape)	English	N/A	Inti Indosawit Subur	please see relevant notes on this

1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria	<p>In some countries, acquisition of permits take a very long time. In other jurisdictions, temporary permits are issued whilst awaiting the full permits. In such instances, growers should be allowed to submit their NPP reports once there is sufficient evidence of legal acquisition of land and absence of substantial conflict. After completion of Steps 6 & 7 of the NPP, growers could then be required to provide proof of requisite permits before being allowed to commence operations. This would reduce the undue delay in the NPP process</p>	English	N/A	Ghana workshop	please see relevant notes on this
1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria	<p>It was suggested to include “unless there is justification” in 1.4, that land development cannot be separated into several NPP submissions unless there is justification.</p>	English	N/A	GAR	reject

1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria	Khusus dokumen AMDAL/EIA dalam kondisi draft/proses boleh menjadi rujukan dokumen NPP RSPO, sebab jika menunggu dokumen AMDAL selesai akan memakan waktu yang lama.	Bahasa	Particularly for AMDAL/EIA documents, they should be allowed to be made reference for RSPO NPP document, even if they are still draft/ongoing documents because it would be too long to obtain the final ones.	Indonesia workshop	please see relevant notes on this
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<p>1.5. Integration of NPP processes with national legal processes</p>	<p>Requirements, process, parameters or criteria</p>	<p>Paragraph 1 dan 2 masih belum jelas waktu diperbolehkan mengajukan NPP karena pada paragraph baris 5-8 “meminta pengajuan ini harus didasarkan atas kajian-kajian yang telah selesai dan final. Dalam hal dimana kajian-kajian tersebut merupakan persyaratan hukum (contoh : AMDAL dan EIA) maka kajian2 tersebut harus telah disetujui oleh pihak yang berwenang.” Sedangkan di paragraph kedua menginformasikan dapat diajukan apabila IUP dan HPL telah terbit padahal dokumen AMDAL dan IUP telah terbit namun hak pelepasan hutan belum tentu selesai. Dengan kondisi diatas maka proses FPIC untuk negosiasi pembebasan lahan diperkenankan bila belum selesai dan IPK diperoleh.</p>	<p>Bahasa</p> <p>Paragraph 1 & 2 are still unclear concerning the period where NPP submission is allowed because line 5-8 of the paragraph: “the submission must be based on completed and finalised assessments. In cases where assessments are a legal requirement, e.g. AMDAL and EIA, the assessments must have been approved by the relevant authority.” Whereas, the second paragraph informs that they can be submitted upon IUP and HPL issuance. In fact</p>	<p>Indonesia workshop</p>	<p>please see relevant notes on this</p>
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				when AMDAL and IUP are issued, the relinquishment of forest rights is not necessarily done. Given such condition, NPP submission can be allowed even if the FPIC process for the negotiation of land acquisition is still ongoing as long as IPK has been obtained. (Note: to be read with original BI text)		
1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria	Recommend 1.4 Land development cannot be separated into several NPP submission phases, Unless there are justifiedable reason.	English	N/A	Indonesia workshop	not accepted.

1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria	Untuk melakukan NPP cukup sampai AMDAL terpenuhi. "Catatan" sebaiknya dihilangkan.	Bahasa	The fulfilment of AMDAL should be sufficient for NPP. 'Note:' should be removed.	Indonesia workshop	please see relevant notes on this. AMDAL does not equal NPP. AMDAL is just an EIA.
1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria	Concern on situation where land clearing is permitted by the authority and but for planting of oil palm, the SEIA is not yet approved due to the processes of other relevant authorities, can the land clearing commence?	English	N/A	Genting Plantations	please see relevant notes on this
1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria	Concern on situation where land clearing is permitted by the authority and but for planting of oil palm, the SEIA is not yet approved due to the processes of other relevant authorities, can the land clearing commence?	English	N/A	Malaysia workshop	please see relevant notes on this

1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria	<p>Conflicting clause on the completion of the legal processes, suggest to delete ‘and is not dependent on the completion of those legal processes’ as the last sentence do mention that the assessments must be approved by the relevant authority where assessments are a legal requirement.</p> <p>“The process of NPP can be initiated at the same time as any national legal requirements (e.g. AMDAL in Indonesia) and is not dependent on the completion of those legal processes. When the NPP is submitted to RSPO, the submission must be based on completed and finalised assessments. In cases where assessments are a legal requirement, e.g. AMDAL and EIA, the assessments must have been approved by the relevant authority.’</p>	English	N/A	Genting Plantations	please see relevant notes on this
1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria	Conflicting clause on the completion of the legal processes, suggest to delete ‘and is not dependent on the completion of those legal processes’ as the last sentence do mention that the assessments must be approved by the relevant authority where assessments are a legal requirement	English	N/A	Malaysia workshop	please see relevant notes on this
1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria	For the National legal requirement and process, pertinent updates or changes in national legal requirements which affects the NPP process should be considered.	English	N/A	Malaysia workshop	please see relevant notes on this

1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria	The phrase, “..is not dependent on the completion of those legal processes” shall be removed – the NPP process is clearly dependent on the completion of AMDAL, etc	English	N/A	Malaysia workshop	please see relevant notes on this
1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria	The process of NPP can be initiated at the same time as any national legal requirements (e.g. AMDAL in Indonesia) and is not dependent on the completion of those legal processes. When the NPP is submitted to RSPO, the submission must be based on completed and finalised assessments. In cases where assessments are a legal requirement, e.g. AMDAL and EIA, the assessments must have been approved by the relevant authority.’	English	N/A	Malaysia workshop	please see relevant notes on this
1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria (national legality)	Current wording for integration of NPP process with national legal process (paragraph 1): “However, when the NPP is submitted to RSPO, the submission must be based on completed and finalised assessments. In cases where assessments are a legal requirement, e.g. AMDAL and EIA, the assessments must have been approved by the relevant authority. Note: In the case of Indonesia, NPP can only be submitted when Ijin Usaha Perkebunan (IUP) and Hak Pelepasan Hutan (HPL) (where applicable) have been obtained” Comment: • Requirement that submitted NPP to be based on completed and finalized assessment and in case where assessments are a legal requirement, e.g. AMDAL and EIA, the assessments must have been	English	N/A	Inti Indosawit Subur	please see relevant notes on this

		<p>approved by the relevant authority is not practical. AMDAL will be modified again after hearing at the Komisi AMDAL based on final comments.</p> <ul style="list-style-type: none"> • RSPO must be aware that application of IUP and HPL takes time and for the purpose of NPP, as long as the process of application has taken place it the NPP notification can be allowed. The company can only commence operation in the affected areas only after the IUP or HPL has been approved. Propose to omit the NB. <p>Therefore propose change the statement to: “However, when the NPP is submitted to the RSPO, all data collection and analysis for such legal requirements must have been completed, and full drafts of the documents must be available. The company must be able to demonstrate that if a legal process is necessary, it is already engaged (in the case of AMDAL, the relevent AMDAL Commission has already approved the KA-Andal)</p>				
1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria (national legality)	Development plan should be submitted to Agricultural Department for approval to align with the state policy. For example, the Sabah state only allow 1.6M ha to be open as OPP. Therefore NPP should be align with state agricultural policy.	English	N/A	Sabah Terrestrial Conservation Programme	reject. Too specific

1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria (national legality)	If there is any conflict between requirement of NPP and the existing national law, then the growers shall prioritise compliance to national law. Example: Indonesian Head of National Land Body (No. 10/SE/VII/2015), in July 2015, instructed governors/bupati, while issuing Ijin Lokasi, for not covering HCVF areas within APL arising from forest release.	English	N/A	First Resources	we have to be careful whether if there is actual conflict which is carelessly used. Just because the law does not require it but RSPO does, this is not conflict.
1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria (national legality)	Los procesos de aprobación de los Estudios o Diagnósticos ambientales en Guatemala son bastantes tardíos. Sería importante se pueda establecer el inicio de los PNP se dé junto con el inicio de los EIA o DA y este sea finalizado o aprobado junto con la resolución del MARN	Spanish	Procedures for the approval of environmental studies and diagnostics in Guatemala are quite protracted. It would be important to establish that the NPP initiatives are launched at the same time as the EIA or DA , and are to be finalized or approved together with the resolution by the Ministry of Environment	Grepalma	noted

				and Natural Resources		
1.5. Integration of NPP processes with national legal processes	Requirements, process, parameters or criteria (national legality)	TH-NI should study about legal process in Thailand to combine with this document	English	N/A	Thai stakeholders	noted
1.5. Integration of NPP processes with national legal processes	Scope and focus (governments)	En el caso particular de Honduras los procesos de licenciamiento ambiental, son requisito legal para que se implemente un proyecto, pero esto de igual manera no se cumple, estos procesos son bien burocráticos, mi opinión es que la RSPO debe de incluir a los gobiernos de Países Miembros este tipo de información e invitarles a participar en las mesas de dialogo, para que en realidad se hagan cambios de sostenibilidad en los países cultivadores de palma Africana.	Spanish	In the specific case of Honduras, environmental licensing procedures are a legal requirement for the implementation of a project, but this is never accomplished as the procedures are so bureaucratic; in my view, the RSPO should extend this type of information to the governments of member countries and	Jaremar	noted

				should invite them to participate in round tables, to ensure that there are real changes moving towards sustainability in countries cultivating African palm.		
1.5. Integration of NPP processes with national legal processes	Smallholders	Bagaimana dengan petani swadaya yang telah bersertifikat RSPO, lalu berencana membangun kebun baru dengan luas dibawah 25 Ha, apakah harus memiliki STDB dulu baru dapat mengajukan NPP? Sebagai catatan bahwa STDB adalah tanda daftar budidaya. Untuk membangun kebun, belum ada aturan mengenai hal tersebut. Artinya untuk petani swadaya dibawah 25 Ha, tidak dapat mengikuti proses seperti perusahaan besar, dengan skala lebih luas.	Bahasa	What about independent smallholders that are already RSPO-certified and plan for new development on areas less than 25 hectares? Should they have STDB in the first place before allowed to apply NPP? Please note that STDB is a register of cultivation. No rules are	Setara Jambi	smallholders are not exempted from NPP but we recognise that we need to look into small scale expansion - how to do NPP?

				applicable in this matter for developing plantation, meaning that independent smallholders with lands less than 25 hectares cannot follow the process on the wider scale like major companies do.		
1.5. Integration of NPP processes with national legal processes	Smallholders	Diperlukan panduan khusus NPP, HCV tools untuk Independent Smallholders ataupun Scheme Smallholders.	Bahasa	Specific NPP guideline and HCV tools for Independent Smallholders or Scheme Smallholders will be necessary.	Indonesia workshop	Simplified tools such as SEIA and HCV are currently under development.
1.5. Integration of NPP processes with national legal processes	Smallholders	NPP scheme smallholders jangan disamakan dengan prosedur NPP kebun inti (perusahaan)	Bahasa	Scheme smallholder NPP should not be confused with the nucleus plantation NPP procedure (company).	Indonesia workshop	noted

1.5. Integration of NPP processes with national legal processes	Syntax, definitions and terminology	First line – For clarity it was suggested to rewrite the text: “Whether and how these assessments can be combined and carried out, taking into account national laws and procedures, will be decided by The National Interpretations”	English	N/A	Inti Indosawit Subur	please see WWF's comment below
1.5. Integration of NPP processes with national legal processes	Syntax, definitions and terminology	Istilah HPL perlu ditinjau ulang, karena yang dikenal adalah Ijin Pelepasan Kawasan Hutan (IPKH)	Bahasa	The term of HPL (Hak Pengelolaan Lahan-Land Management Right) must be re-reviewed because the known term is IPHK (Izin Pelepasan Kawasan Hutan-Permit of Forest Land Release).	Indonesia workshop	accept
1.5. Integration of NPP processes with national legal processes	Syntax, definitions and terminology	Paragraph 2. HPL should be changed to IPKH (Ijin Pelepasan Kawasan Hutan).	English	N/A	Inti Indosawit Subur	accept

1.5. Integration of NPP processes with national legal processes	Syntax, definitions and terminology	Perlu klarifikasi dari definisi Hak Pelepasan Hutan (HPL) Hilangkan kalimat “note: untuk Indonesia.....telah diperoleh”	Bahasa	Clarification is necessary on the definition of Rights to Forest Relinquishment (HPL). Remove this sentence: “note: In the case for Indonesia.....has been obtained”.	Indonesia workshop	This will not be removed
1.5. Integration of NPP processes with national legal processes	Syntax, definitions and terminology	The National Interpretations will decide whether and how these assessments can be combined and carried out, taking into account national laws and procedures. The role of the National Interpretation is the ‘give guidance’ on these issues – NOT to decide. This word should be replaced.	English	N/A	WWF	accept
1.5. Integration of NPP processes with national legal processes	Technical clarification (size area)	Dasar 500 ha disesuaikan dengan RSPO P&C Generic yang mengatakan sesuai dengan National Interpretation. Indonesia NI menyatakan independent assessment is for > 3000 ha.	Bahasa	The basis for 500 hectares should be adjusted with the Generic RSPO P&C that mentions ‘according to the National Interpretation’. According to Indonesian NI, independent	Indonesia workshop	noted. Please see relevant notes on this issue

				assessment is for >3,000 hectares.		
1.5. Integration of NPP processes with national legal processes	Technical clarification (size area)	The RSPO P&C defines a base of 500 ha exempts from HCVA. However, in the Indonesian NI, it was declared that independent assessment is for > 3000 ha.	English	N/A	GAR	noted
1.5. Integration of NPP processes with national legal processes	Technical detail (national legality)	HPL = Izin Pelepasan Kawasan Hutan. It is not a “hak” because the land use status changes administratively to APL after release. IPKH is not to be mistaken for the preliminary permit (izin prinsip) which only triggers a verification procedure and does not grant rights to open up forestland. EIA: “must be fully approved by the relevant authority” (in Indonesia, the final step is the issuance of the Environmental Permit).	English	N/A	Aidenvironment	Noted and accepted. IUP is needed and in cases IPKH. EIA must be approved first

Section 2: Detailed process and action steps

General comments

Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Add more specific detail or explanation	Considerando que es una sección , donde está a detalle lo grueso del procedimiento, debe de incluir ejemplos y en las consultas públicas se debería de aprovechar para ser Talleres, siempre es muy rápido el proceso de consulta, sin duda se pueden quedar muchas cosas reales del contexto de cada región.	Spanish	Given that there is only one section in which the bulk of the procedure is described in detail, that section should include examples, and public consultations should be used as workshops, as the consultation process will always be faster, and many genuine issues relating to each region may thereby be raised.	Jaremar	Noted
Clarification of area	Especificar a qué límites se refiere, pues no se pueden revisar límites de propiedad privada ya asignada	Spanish	Specify what boundaries are being referred to, given that the boundaries of private property that has already been assigned cannot be revised	Colombia workshop	Noted and incorporated
Graphics	For clarity, there should be tables to clearly define roles and timeline for each activity/ process e.g. submission of NPP/ checking by RSPO/ comments for resolution/completion, notification by RSPO, land preparation, etc	English	N/A	Malaysia workshop	Noted and incorporated

Graphics	Revisar el flujograma de la página 10. El paso 1 (definición de un nuevo desarrollo de palma de aceites) debería inicialmente validarse los títulos legales de los predios	Spanish	Revise the flowchart on page 10. In step 1 (definition of a new palm oil development area) the legal title to the planting area should first be verified.	Colombia workshop	Step 1 states that "The area (ha) must be calculated based on the permit or land deed to which the NPP will apply
Graphics	Revise the flowchart to include – the responsibility for each process, and the timeframe and/or any other remarks/special exceptions as described in Section 2 should be clearly presented in the flowchart	English	N/A	Malaysia workshop	See Figure 1 - NPP action steps and responsible party for each step
Graphics	Submitted graphics must be congruent with the exposed information later in the document.	English	N/A	Solidaridad	Noted and incorporated
Graphics	Suggest to develop new table/matrix (as in Table 2 of the RSPO Remediation and Compensation Procedures) for pre-determination of NPP process & Action step for each categories below: 1) Non member at the time of development 2) Land taken over by member 3) RSPO member with land without NPP	English	N/A	Genting Plantations	Noted and incorporated

Graphics	Suggest to develop new table/matrix (as in Table 2 of the RSPO Remediation and Compensation Procedures) for pre-determination of NPP process & Action step for each categories below: o Non-member at the time of development o Land taken over by member o RSPO member with land without NPP	English	N/A	Malaysia workshop	Noted and incorporated
Graphics	To revise the flowchart to include – the responsibility for each process, and the timeframe and/or any other remarks/special exceptions as described in Section 2 should be clearly presented in the flowchart	English	N/A	Genting Plantations	See Figure 1 - NPP action steps and responsible party for each step
Positive overall	Overall pfocess is cleared [sic]	English	N/A	Thai stakeholders	Noted

Requirements, process, parameters or criteria	Ada peluang akan terjadi pengajuan NPP secara bertahap dikarenakan isu luasan lahan yang diperoleh oleh perusahaan diperoleh secara bertahap dan persetujuan luasan diberikan secara bertahap. Contoh: Area perkebunan terdiri dari APL dan sebagian masih diurus pelepasannya. AMDAL hanya diberikan pada area APL sementara pada tahap berikutnya area yang belum dilepaskan oleh pemerintah pada akhirnya dilepaskan. Sehingga menurut grower maka NPP sebaiknya dilakukan 2 kali yaitu pada area yang telah mendapatkan AMDAL, lalu pada pengajuan berikutnya setelah AMDAL pada area yang dilepaskan telah diperoleh.	Bahasa	There is an opportunity for progressive NPP submission since land area is obtained gradually by companies and its approval is also progressive. An example would be a plantation area consisting of APL while the remaining area is still in the acquisition process. AMDAL is only given for APL land and a second AMDAL is to be done for the land currently in the acquisition process. Therefore growers believe that NPP would be best carried out twice, i.e. for land with AMDAL and a second submission following completion of AMDAL for the acquired land.	Indonesia workshop	please see notes on on-going planting
Requirements, process, parameters or criteria	Especificar perfil mínimo de asesor líder AVC para extensiones menores de 500 hectáreas	Spanish	Specify a minimum profile of the HCV lead assessor for extensions of less than 500 hectares.	Colombia workshop	now same as for >500 ha - except can be internal

Requirements, process, parameters or criteria	Este paso es responsabilidad del productor, y en él se deberían identificar los límites de la nueva propuesta de desarrollo, así como su ubicación dentro del paisaje. El Productor debe verificar si el área identificada esta o no en la zona de amortiguamiento de Áreas Protegidas y si esta dentro de dicha zona, verificar si es permitido la siembra de palma aceitera. En los casos de suelos con pendientes superiores a lo permitido por la Interpretación Nacional respectiva (o la de RSPO) se debería agregar un plan de reemplazo gradual del cultivo de palma aceitera, por cultivos agroforestales.	Spanish	This step is the responsibility of the grower, and should identify the boundaries of the proposed new development as well as its location within the landscape. The grower must verify whether or not the identified area is in the Protected Area buffer zone and, if it does lie within that zone, must check whether the planting of oil palm is permitted. In cases of land with gradients steeper than those permitted by the relevant national interpretation (or that of the RSPO), a plan should be added for the gradual replacement of oil palm cultivation by agroforestry.	Solidaridad	Not clear. Development cannot be on steep slopes and protected areas
Requirements, process, parameters or criteria	Hacer la salvedad que la consulta previa incluye el consentimiento libre previo informado (aplicable para grupos étnicos en Colombia).	Spanish	Include a provision that prior consultation should include free, prior and informed consent (applicable to all the ethnic groups in Colombia).	Colombia workshop	FPIC already part of P&C and text on this in NPP

Scope and focus	Existe una preocupación por los productores que aún no implementan RSPO pero que piensan hacerlo en el futuro. Ellos nunca van a poder vender su producto de ciertas áreas de su plantación. La certificación parece tan compleja que nadie lo quiere hacer. ¿Qué objetivo tiene certificar un área, de la cual no puedes vender el producto certificado? ¿El día en que el 100% de la palma se exija certificada, que pasará con los productores que cometieron errores o escucharon recién de RSPO? ¿Salen del mercado y no hay cómo incluirlas?	Spanish	There is concern on the part of those growers who have not yet implemented RSPO but who are considering doing so in the future. They will never be able to sell the produce from certain areas of their plantation. The certification process seems so complex that no one wants to do it. What is the point of certifying an area if you cannot sell the certified product from it? When the time comes that 100 per cent of all palm oil has to be certified, what will happen to the growers who made mistakes or who only recently heard about RSPO? Must they be excluded from the market and is there no way to include them?	Colombia workshop	the issue of sanctions for NPP is being explored
Scope and focus	Is better to stress the process on the development of each step than on its background.	English	N/A	NES Naturaleza	Noted
Smallholders	In Bahasa version, It s better to make FAQ (Q and A) to answer some questions related to smallholders	English	N/A	Inti Indosawit Subur	No FAQ in document

Smallholders	Pada P&C generic, Prinsip 5.4 dan 5.6 belum berlaku bagi petani swadaya, sementara dalam NPP prinsip 5.4 dan 5.6 adalah menjadi bagian penting dalam NPP, dan sudah harus dijalankan pada tahun 2010. Prinsip dan Criteria untuk petani mandiri yang baru, belum di setujui. Bagaimana NPP yang terkait dengan 5.4 dan 5.6 dapat dibebankan. Ketika P&C baru untuk petani belum di setujui, artinya petani masih menggunakan P&C yang lama, dimana 5.4 dan 5.6 belum dapat dibebankan pada petani hingga tahun 2015.	Bahasa	According to the Generic P&C, Principles 5.4 and 5.6 are yet to apply to independent smallholders, while according to NPP they constitute an important part to the NPP and shall have been implemented by 2010. The new P&C for independent smallholders is pending approval. How can we require them to implement elements of the NPP that relates to 5.4 and 5.6? If the new P&C for smallholder is yet to be approved, this means that smallholders are still using the old one where 5.4 and 5.6 are not yet required from them until 2015.	Setara Jambi	please see related comments on smallholders
Structure of document	Disarankan dibuat FAQ (Q and A) untuk menjawab beberapa pertanyaan yang mungkin muncul	Bahasa	It is suggested to compile Frequently Asked Questions (FAQ) and answers for questions that might arise.	Indonesia workshop	Noted but the FAQ should not be part of the NPP document
Syntax, definitions and terminology	A better explanation of each steps with a familiar language for growers is needed	English	N/A	NES Naturaleza	Noted - is it currently in unfamiliar terms or language for Spanish speakers?
Syntax, definitions and terminology	Aclarar concepto de comunidades locales en el glosario	Spanish	Clarify the concept of local communities in the glossary.	Colombia workshop	This will be as defined by the RSPO FPIC guidance document

Syntax, definitions and terminology	Claridad de lenguaje. Resumir la sección 2 e incorporar más flujogramas explicativos	Spanish	Clarity of language. Summarize section 2 and incorporate more explanatory flowcharts.	Colombia workshop	Noted - action taken
Syntax, definitions and terminology	Clarification is not clear in terms used in regard to requirements vs options. Should vs shall?	English	N/A	Malaysia workshop	Noted - action taken
Technical clarification (timeframe)	Debido a que esta sección involucra únicamente a casos de plantaciones que inician desde cero (No se considera los casos de las plantaciones que ya se encuentran sembradas desde el 2010 y no aplicaron el PNP) Consideramos que es necesario dividir el procedimiento en 2 etapas. (Plantaciones establecidas y las que apenas contemplan la siembra) y actividades asociadas que deben realizar cada una	Spanish	Since this section only involves plantations started from scratch (and does not apply to those plantations which had already been planted since 2010 when the NPP was not yet in place), we believe it necessary to divide the procedure into two stages. (Established plantings and those where planting is just being considered) and the associated activities to be carried out in each.	Colombia workshop	we will not have a tiered approach to NPP

Comments on subsections of Section 2

Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Figure 1 : NPP Process overview	Add more specific detail or explanation	On 1: El Diagrama del Procedimiento, debe considerar otros puntos importantes como el tamaño del Nuevo desarrollo, para considerar que tipo de evaluadores va a necesitar.	Spanish	On 1: The flowchart should consider other important issues, such as the size of the new development, in order to determine what kind of assessors may be needed.	Jaremar	Covered in Table 2
Figure 1 : NPP Process overview	Add more specific detail or explanation	On 1: Préciser s'il s'agit d'une délimitation ou d'une définition de la zone de développement du projet	French	On 1: Specify if this relates to a mapping or delineation or to a definition of the project development area.	Gabon workshop	yes
Figure 1 : NPP Process overview	Internal consistency	On 1: Later in the description of Step 1 and Step 2 is being proposed two different terms to those found in the exposed flowchart.	English	N/A	NES Naturaleza	check for consistency
Figure 1 : NPP Process overview	Syntax, definitions and terminology	On 1: - Mengubah struktur penulisan menjadi: Menentukan luasan pengembangan baru yang akan diajukan	Bahasa	On 1: - Change writing structure into: Determine the size of proposed new development	Indonesia workshop	Noted.
Figure 1 : NPP Process overview	Syntax, definitions and terminology	On 1: El nombre del paso 1 no corresponde (No está incluido en la versión traducida al castellano)	Spanish	On 1: The description of step 1 does not match (it has been omitted from the Spanish translation).	Colombia workshop	Noted.

Figure 1 : NPP Process overview	Technical clarification (size area)	On 1: - Luasan pengembangan baru yang diajukan sesuai dengan ijin yang diperoleh	Bahasa	On 1: - The size of proposed new development is according to obtained permit	Indonesia workshop	should be so
Figure 1 : NPP Process overview	Technical clarification (size area)	On 1: Ada penambahan redaksional menjadi “luasan pengembangan baru yang diajukan telah ditentukan berbasis legal (izin lokasi)”	Bahasa	On 1: Text should be added so that it becomes: “size of the proposed new development is already determined using legal basis (location permit)”	Indonesia workshop	noted
Figure 1 : NPP Process overview		On 1: There is not the appropriate object.	English	N/A	NES Naturaleza	unclear
Figure 1 : NPP Process overview	Add more specific detail or explanation	On 2: Relevant Stakeholder: be more specific i.e. local, surrounding, regional etc	English	N/A	Malaysia workshop	stakeholders already identified in annex of P&C
Figure 1 : NPP Process overview	Add something	On 2: Suggestion: Identification and invitation of relevant stakeholder	English	N/A	Inti Indosawit Subur	reject
Figure 1 : NPP Process overview	Add something	On 2: También debe de considerar que si existen conflictos y que procede.	Spanish	On 2: It is also necessary to consider whether there are conflicts and what may arise from them.	Jaremar	Noted.
Figure 1 : NPP Process overview	Requirements, process, parameters or criteria	On 2: Hilangkan langkah no 2, karena sudah tercakup pada langkah no 3	Bahasa	On 2: Remove step 2 because it is already covered by step 3.	Indonesia workshop	reject

Figure 1 : NPP Process overview	Syntax, definitions and terminology	On 2: Later in the description of Step 1 and Step 2 is being proposed two different terms to those found in the exposed flowchart.	English	N/A	NES Naturaleza	check for consistency
Figure 1 : NPP Process overview	Syntax, definitions and terminology	On 2: Préfère le terme CLIP à « identification et engagement des parties prenantes »	French	Prefer the term FPIC instead of “identification and engagement of stakeholders”	Gabon workshop	reject
Figure 1 : NPP Process overview	Syntax, definitions and terminology	On 2: The term used in the object 1 is very similar than the one here, both refer to the involvement of stakeholders.	English	N/A	NES Naturaleza	unclear
Figure 1 : NPP Process overview	Add more specific detail or explanation	On 3: Agregar vinculación de HCVNR. Para información de asesores	Spanish	On 3: Add a link to HCVNR. - for the information of the assessors.	Grepalma	can make reference but not website link which may change
Figure 1 : NPP Process overview	Add more specific detail or explanation	On 3: Mohon diperjelas, apakah memang diperlukan Kajian GRK atau cukup Perhitungan HCS?	Bahasa	On 3: Please make clear: is it necessary to carry out GHG Study or would HCS Calculation be sufficient?	Indonesia workshop	C7.8, rsपो ghg assessment procedure. Covers carbon stock assessment and ghg emission
Figure 1 : NPP Process overview	Graphics	On 3: El Diagrama debería indicar lo mas importante de cada paso, para que en un solo flujo matricial se entienda el procedimiento.	Spanish	On 3: The overview should indicate the most important elements of each step, so that the whole procedure can be set out in a single flowchart.	Jaremar	use of flowchart is good

Figure 1 : NPP Process overview	Internal consistency	On 3: Survey kesesuaian lahan, topografi & jenis tanah sudah termasuk dalam kajian HCV 3&4.2	Bahasa	On 3: Suitability survey for land, topography and soil types is already included in HCV 3 & 4.2 assessment.	Indonesia workshop	these assessments may be separate or included in HCV assessment, either way results must be presented as per Annex 1
Figure 1 : NPP Process overview	Smallholders	On 3: Not clear until now about implementation for smallholder	English	N/A	Thai stakeholders	see notes on smallholders
Figure 1 : NPP Process overview	Smallholders	On 3: This step should be simplified for smallholders	English	N/A	Thai stakeholders	see notes on smallholders
Figure 1 : NPP Process overview	Syntax, definitions and terminology	On 3: It is not clear if GHG assessment and HCS approach are used throughout the document interchangeably. We suggest checking consistency and adjusting accordingly to use same language throughout. E.g. carbon stocks and GHG emissions.	English	N/A	Oxfam	HCS approach should not appear in NPP

Figure 1 : NPP Process overview	Technical detail (peat drainage)	On 3: We believe that 'drainability assessment for developments on peat' should be added in Box 3. Before any new planting on peat it is important to know IF it is viable to plant because of land subsidence and 'flooding' and 'salt water intrusion' issues. P&C 4.3.5 Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. P&C for 4.3.5: Where drainability assessments have identified areas unsuitable for oil palm replanting, plans should be in place for appropriate rehabilitation or alternative non-drained - use of such areas. If the assessment indicates high risk of serious flooding and/or salt water intrusion within two crop cycles, growers and planters should consider ceasing replanting and implementing rehabilitation	English	N/A	Wetlands International	Noted.
Figure 1 : NPP Process overview	Technical detail (soil)	On 3: Aptitude des sols rentre dans le cadre des EIES.	French	On 3: Soil suitability falls within the scope of ESIA	Gabon workshop	regardless, summary results must be presented as per Annex 1

Figure 1 : NPP Process overview	Requirements, process, parameters or criteria	On 4: An important step is missing. (1) justification of go and no-go areas based on the outcomes of assessments (2) Management and Mitigation plans (wording of P&C) (for go-areas) (3) monitoring plans (for go-areas) Wording used in the text of the 'GHG assessment procedure': 'Justify based on the outcomes of the calculation of C-stock changes and associated GHG emissions between before- and after development (for above ground, below ground and peat), which areas will be developed for new plantings and which areas not'.	English	N/A	Wetlands International	this will be in the assessment and management plans
Figure 1 : NPP Process overview	Add more specific detail or explanation	On 5: Indicar a quién se le envía el informe. Indicar que pasa si son rechazados vincular retorno de fase o continuidad	Spanish	On 5: Indicate to whom the report will be sent. Indicate what will happen if they are rejected, if this entails going back a step or if the process continues.	Grepalma	Refer to Step 6 and Step 7.
Figure 1 : NPP Process overview	Structure	On 5: Mengusulkan agar ada box baru berisi: Verifikasi NPP oleh CB	Bahasa	On 5: Suggest for new box containing 'NPP verification by CB'.	Indonesia workshop	revised section on CB verification
Figure 1 : NPP Process overview	Structure	On 5: Suggestion: Proposed to split the box between Preparation of NPP and Verification of NPP	English	N/A	Inti Indosawit Subur	now written as sections, not a box

Figure 1 : NPP Process overview	Syntax, definitions and terminology	On 5: Mengusulkan agar dipisah menjadi: Penyusunan NPP	Bahasa	On 5: Suggest separating as: NPP preparation.	Indonesia workshop	noted
Figure 1 : NPP Process overview	Requirements, process, parameters or criteria	On 6: Growers will submit notification? Or ?	English	N/A	Thai stakeholders	Refer to Step 6.
Figure 1 : NPP Process overview	Requirements, process, parameters or criteria	On 6: Indicar que pasa si son rechazados vincular retorno de fase o continuidad	Spanish	On 6: Indicate what happens if if they are rejected, if this entails going back a step or if the process continues.	Grepalma	Refer to Step 6 and Step 7.
Figure 1 : NPP Process overview	Requirements, process, parameters or criteria	On 6: Suggestion: Propose to add a new box contains: Submission of NPP report by CB.	English	N/A	Inti Indosawit Subur	in section 5 on verification
Figure 1 : NPP Process overview	Requirements, process, parameters or criteria	On 6: Who to submit notification? i.e. CB or grower	English	N/A	Malaysia workshop	Refer to Step 6.
Figure 1 : NPP Process overview	Requirements, process, parameters or criteria	On 7: Ajouter une étape sur la notification de l'approbation du processus ou non par le RSPO et les actions suivantes en cas de non approbation.	French	Add a step about notification of approval or non-approval of the process by the RSPO and follow-up actions in cases of non-approval.	Gabon workshop	Refer to Step 6 and Step 7.
Figure 1 : NPP Process overview	Technical detail	Peatland need to do the undrainability assessment study.	English	N/A	Indonesia workshop	Noted.

Figure 1 : NPP Process overview	Add more specific detail or explanation	SEIA, HCV assessment, LUC analysis, soil suitability and topographic survey and GHG assessment. This list would be strengthened if riparian buffer zones required within the P&Cs and as part of 7.1 were also specified here.	English	N/A	WWF	accept
Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Step 1: Definition of new oil palm development	Add more specific detail or explanation	Describir ubicación geo referenciada dentro del paisaje	Spanish	Describe the geographical location referred to as position within the landscape.	Grepalma	GPS coordinates referenced
Step 1: Definition of new oil palm development	Add more specific detail or explanation	Es muy escueto el texto y no es claro a qué se refiere con los límites de la nueva propuesta de desarrollo: ¿Áreas proyectadas para siembra o área de propiedad? Un árbol de decisiones podría hacer más fácil de entender la ruta	Spanish	The text is very sparse and it is not clear what is meant by the boundaries of the proposed new development proposal: areas protected for planting or area of ownership? The use of a decision tree would make it easier to follow the process.	Colombia workshop	is it clearer if it is new development area according to the land permit?
Step 1: Definition of new oil palm development	Add more specific detail or explanation	Guidance notes would be needed? E.g. GPS position/coordinates?	English	N/A	Malaysia workshop	GPS coordinates referenced

Step 1: Definition of new oil palm development	Clarification of area	El área del nuevo proyecto nunca debe ser en un reserva de agua	Spanish	The site for the new project should never be a water reservoir	Jaremar	Noted.
Step 1: Definition of new oil palm development	Clarification of area	El área del nuevo proyecto nunca debe ser zona nucleo de área protegida	Spanish	The site for the new project should never be the core area of a protected area	Jaremar	noted.
Step 1: Definition of new oil palm development	Clarification of area	El área del nuevo proyecto, nunca debe ser un bosque primario	Spanish	The site for the new project should never be a primary forest	Jaremar	Section 1.1

Step 1: Definition of new oil palm development	Clarification of area	It is recommended that a preliminary rapid assessment should be undertaken to identify areas in the original proposed project area that are most likely to contain HCVs. These areas should then be exempted from the area over which the grower pays ground rent since no planting would be done in these areas. The defined oil palm development area would thus only encompass potentially plantable areas. Currently, most companies are paying ground rent for an entire proposed project area, but eventually end up with huge non-plantable areas for which paid ground rent is not reclaimable	English	N/A	Ghana workshop	too specific to include in NPP
Step 1: Definition of new oil palm development	FPIC	El área del nuevo proyecto debe contar con su derecho de uso (legal y consentimiento de las comunidades o grupos indígenas)	Spanish	The site for the new project must take account of usage rights (the legal status and the consent of indigenous communities or groups)	Jaremar	FPIC covers this
Step 1: Definition of new oil palm development	Internal consistency	Kontradiksi dengan uraian 1.4. yang menyatakan bahwa NPP harus diajukan untuk keseluruhan luasan sesuai ijin.	Bahasa	Contradicts with point 1.4. which states that NPP should be proposed for all land areas according to permit.	Indonesia workshop	noted

Step 1: Definition of new oil palm development	Internal consistency	Pg 10 Step 1 Does this blue text need to reiterate the statements of section 1.4. and add in " The final area considered in the assessment must be calculated based on the permit or land deed to which the NPP will apply (i.e. total area considered for palm oil development) "	English	N/A	HSBC	revised version clear on this
Step 1: Definition of new oil palm development	Requirements, process, parameters or criteria	"This step is the responsibility of the grower, and should identify the boundaries of the proposed new development. as well as its position within the landscape	English	N/A	Genting Plantations	clarified that all steps are ultimately the grower's responsibility
Step 1: Definition of new oil palm development	Requirements, process, parameters or criteria	The grower should get approval of land development plan from the agricultural department before starting the process.	English	N/A	Sabah Terrestrial Conservation Programme	See section 1.5
Step 1: Definition of new oil palm development	Requirements, process, parameters or criteria	This step is the responsibility of the grower, and should identify the boundaries of the proposed new development. as well as its position within the landscape	English	N/A	Malaysia workshop	clarified that all steps are ultimately the grower's responsibility
Step 1: Definition of new oil palm development	Requirements, process, parameters or criteria	To include requirement of mapping the whole area (proper in concession area boundaries, new planting area) before mapping the customary right area etc.	English	N/A	Malaysia workshop	Noted.

Step 1: Definition of new oil palm development	Smallholders	Grower – needs to include smallholders	English	N/A	Malaysia workshop	NPP applies to smallholders
Step 1: Definition of new oil palm development	Syntax, definitions and terminology	Propose d'utiliser le terme « délimitation (ou cartographie)» de la zone de développement en lieu et place du terme « définition »	French	Suggest using the term "mapping" or "delineation" instead of the word "definition".	Gabon workshop	accept
Step 1: Definition of new oil palm development	Syntax, definitions and terminology	Suggest to delete 'as well as its position within the landscape' is this is repetitive.	English	N/A	Malaysia workshop	reject
Step 1: Definition of new oil palm development	Syntax, definitions and terminology	Suggest to delete 'as well as its position within the landscape' is this is repetitive.	English	N/A	Genting Plantations	reject
Step 1: Definition of new oil palm development	Syntax, definitions and terminology; Translation	Faire une révision de l'utilisation de « devrait » et « devra » dans la version française du document	French	Review the use of « should » and « shall » in the French version	Gabon workshop	ok

Step 1: Definition of new oil palm development	Technical clarification (size area)	It would be worth repeating in this section that: The final area considered in the assessment must be calculated based on the permit or land deed to which the NPP will apply (i.e. total area considered for palm oil development). For instance if the permit is for 1000 ha of land, an NPP should be submitted covering the 1000 ha. Land development cannot be separated into several NPP submission phases.	English	N/A	WWF	ok
Step 1: Definition of new oil palm development		Apabila tidak berbasis kepada legal akan	Bahasa	If it has no legal basis it would ...	Indonesia workshop	Unclear.

Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Step 2: Identification & engagement of relevant stakeholders	Add more specific detail or explanation	'Relevant stakeholders' is explicitly defined to include local communities and indigenous groups. What about others? Is there a formal definition of the full scope of stakeholders? How does one exclude self-identified 'relevant stakeholders' who are not considered by others to be either relevant or a true stakeholder? Further guidance is required.	English	N/A	Ghana workshop	rspo P&C annex defines stakeholders
Step 2: Identification & engagement of relevant stakeholders	Add more specific detail or explanation	Best-practice - requirement/recommendation?	English	N/A	Malaysia workshop	unclear
Step 2: Identification & engagement of relevant stakeholders	Add more specific detail or explanation	Concernant les représentants des communautés. Ajouter à la fin du premier point : (...) identifiées par les communautés elles-mêmes	French	With regards to the representatives of the communities, add at the end of the first point: (...) identified by the communities themselves.	Gabon workshop	this section has been revised

Step 2: Identification & engagement of relevant stakeholders	Add more specific detail or explanation	Concerning this phrase: Prior to starting the social and environmental studies, the grower needs to start a participatory identification of local peoples' lands by conducting participatory mapping processes with all impacted communities, to map areas where it can be demonstrated that there are legal, customary or user rights. HCVRN comment: It should be clear to the company that consent (FPIC) is needed to conduct participatory mapping.	English	N/A	HCVRN	Noted.
Step 2: Identification & engagement of relevant stakeholders	Add more specific detail or explanation	Incluir una anotación que el proceso debe regirse por la legislación nacional vigente, de haberla, y por la interpretación nacional	Spanish	Include a note stating that the process should be governed by current national legislation, where available, and according to the national interpretation.	Colombia workshop	See section 1.5
Step 2: Identification & engagement of relevant stakeholders	Add more specific detail or explanation	Obtain and document consent – of communities.	English	N/A	Malaysia workshop	Noted

Step 2: Identification & engagement of relevant stakeholders	Add more specific detail or explanation	Pg 11 Para 4 - Blue text add in words"and local communities should have free and open access .."	English	N/A	HSBC	Noted
Step 2: Identification & engagement of relevant stakeholders	Add more specific detail or explanation	To list down the qualified FPIC-trained companies	English	N/A	Malaysia workshop	reject
Step 2: Identification & engagement of relevant stakeholders	Add more specific detail or explanation (stakeholders)	En las partes interesadas, no se menciona a los gobiernos locales y ONG, ambientales y sociales que pueden ser parte importante para determinar los derechos legales de las comunidades aledañas al proyecto, además serán como los testigos de que ambas partes quedaron satisfechas de las negociaciones que acordaron mediante un proceso transparente y participativo.	Spanish	Among the stakeholders, no mention is made of local governments or NGOs dealing with environmental and social issues, which could play an important role in determining the legal rights of the communities surrounding the project, and could also serve as witnesses that both sides were satisfied with the negotiations and had reached agreement through a transparent and participatory process.	Jaremar	Noted.

Step 2: Identification & engagement of relevant stakeholders	Add something	Good to see participatory mapping is explicitly included in this step. An opportunity missed in this step is that stakeholder engagement is also a good moment to generate input into management and monitoring plans	English	N/A	Oxfam	Noted.
Step 2: Identification & engagement of relevant stakeholders	FPIC	1. Paragraph 2, last sentence. What is the meaning qualified FPIC trained company staff. Today there is no formal qualification process for FPIC. Suggestion: to change the wording to “It is considered best practice that this FPIC process is carried out internally”.	English	N/A	Inti Indosawit Subur	reject
Step 2: Identification & engagement of relevant stakeholders	FPIC	Aclaración en la aplicación del CLPI si es un predio propiedad privada. Dejar claro que se respeta el proceso de desarrollo de un nuevo proyecto palmero, aun cuando la comunidad no se encuentre de acuerdo. De igual manera, la empresa debe mostrar la información resultado de los estudios para el cumplimiento del principio de transparencia de la P&C	Spanish	Clarification on the application of FPIC if it is a privately owned holding. Clarify that the process of developing a new palm project is being followed, even if the community has not agreed to it. Similarly, the company must show the information derived from the studies in order to comply with the transparency principle of the P&C.	Colombia workshop	Refer to FPIC notes

<p>Step 2: Identification & engagement of relevant stakeholders</p>	<p>FPIC</p>	<p>Community engagement and FPIC process (paragraph 4): Current wording: “The community engagement and FPIC process should continue during the following steps, and local communities should have access to the results of any studies carried out”</p> <p>Comment: Apart from local communities, individuals also have to be considered during community engagement and FPIC process. This is because in some communities, many will support the project and sell their land rights, while some will refuse. That is fine, and should be recognized. Communities are not unified.</p> <p>Proposed wording: “The community engagement and FPIC process should continue during the following steps, and local communities and individuals should have access to the results of any studies carried out”</p>	<p>English</p>	<p>N/A</p>	<p>Musim Mas</p>	<p>accept</p>
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Step 2: Identification & engagement of relevant stakeholders	FPIC	Concern that a comprehensive guidance of FPIC is not available, and the grower is being accused later in the process (after few years) that the FPIC process was not rightly conducted earlier	English	N/A	Malaysia workshop	Refer to FPIC notes
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Step 2: Identification & engagement of relevant stakeholders	FPIC	<p>Concerning this phrase: It is considered best practice that this FPIC process is carried out by qualified (FPIC-trained) company staff rather than external consultants.</p> <p>HCVRN comment: We suggest reformulation to include collaboration with external consultant or language/social experts– especially if company staff have little or no experience with FPIC. Do not agree that FPIC is best done by company alone as they obviously have a vested interest in outcome. Company staff should be involved but with participation of an independent 3rd party who is trusted by the local people undergoing the FPIC process.</p> <p>The growers and the communities should mutually agree on procedures to:</p> <ul style="list-style-type: none"> • Identify which are the communities’ representatives or representative institutions; • Identify the extent of legal, customary and/or user rights (e.g. participatory mapping); 	English	N/A	HCVRN	Refer to FPIC notes
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	<ul style="list-style-type: none"> • Document the FPIC process, including any granting or withholding of consent and any outstanding issues 				
	<p>On the basis of this stakeholder engagement process, the boundaries of the proposed new development may be modified prior to commencement of further environmental and social studies. Local communities will be made aware of the upcoming studies to be conducted on their land and land that they use as part of the information sharing process. The community engagement and FPIC process should continue during the following steps, and local communities should have access to the results of any studies carried out, which should inform their ultimate decision to consent or refuse the planned development.</p>				

<p>Step 2: Identification & engagement of relevant stakeholders</p>	<p>FPIC</p>	<p>Current wording: “Prior to starting the social and environmental studies, the grower needs to start an identification of local peoples’ lands and rights by conducting participatory mapping processes with all impacted communities, to map areas where it can be demonstrated that there are legal, customary or user rights. This is the start of the formal engagement of local communities and indigenous peoples groups, and of the Free, Prior and Informed Consent (FPIC) process2: where local peoples have legal, customary or user rights, they have the right to say ‘no’ to operations planned on their land. It is considered best practice that this FPIC process is carried out by qualified (FPIC-trained) company staff rather than external consultants”</p> <p>Comment: It is important to be careful not to have the process of identification of local peoples’ lands and rights understood as having the maps COMPLETED before we can proceed. This will</p>	<p>English</p>	<p>N/A</p>	<p>Musim Mas</p>	<p>pls see FPIC notes</p>
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		be a long process, and will require significant FPIC. We cannot wait to have every smallholder in an area mapped before proceeding, it is both impractical and a serious source of social unrest as the first people to have their plots mapped will grow very impatient with the process.				
Step 2: Identification & engagement of relevant stakeholders	FPIC	Definition of FPIC-trained?	English	N/A	Malaysia workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	FPIC	Etape 2 = CLIP ????	French	Step 2 = FPIC ????	Gabon workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	FPIC	Khusus pelaksana FPIC apakah boleh orang perusahaan yang telah mendapatkan training oleh trainer berkualifikasi boleh mentrainingkan anggota perusahaan lainnya dan melaksanakan FPIC.	Bahasa	Particularly for FPIC process executors, can individuals or companies that have been trained by qualified trainers deliver trainings to other company members and carry out FPIC?	Indonesia workshop	Refer to FPIC notes

Step 2: Identification & engagement of relevant stakeholders	FPIC	Nécessité que la société civile accompagne les communautés locales dans le processus CLIP et que le choix de cette société civile incombe aux communautés locales	French	Civil society must support local communities in the FPIC process; and the selection of the civil society organisation(s) must be the responsibility of local communities	Gabon workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	FPIC	Once a company has a process/programme in place and is able to demonstrate FPIC implementation (i.e. when FPIC is demonstrated to have started), they should be able allowed to submit the NPP report since FPIC is an ongoing process.	English	N/A	Ghana workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	FPIC	suggest making reference to RSPO guidance on FPIC here	English	N/A	HCVRN	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	FPIC	There is a need to clarify and define “qualified FPIC trained” company staff. In today’s context and industry, there are no recognised formal training and/or qualification process for FPIC	English	N/A	Sinar Mas	Refer to FPIC notes

Step 2: Identification & engagement of relevant stakeholders	FPIC	There is a need to clarify and define “qualified FPIC trained” company staff. In today’s context and industry, there are no recognised formal training and/or qualification process for FPIC.	English	N/A	GAR	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	FPIC	There should be a reference to the RSPO FPIC guidance document (prevailing or new version to be released) on the implementation details of the requirements listed	English	N/A	Indonesia workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	FPIC	There should be a reference to the RSPO FPIC guidance document (prevailing or new version to be released) on the implementation details of the requirements listed.	English	N/A	Inti Indosawit Subur	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	FPIC	What happens in a situation where land-owning government gives right to a company to use the land but the local people with use rights are resisting the development? Wherein lies the FPIC? To what extent should the potentially affected people on the ground be engaged?	English	N/A	Ghana workshop	Refer to FPIC notes

Step 2: Identification & engagement of relevant stakeholders	FPIC	What is meant by ‘a qualified (FPIC-trained) company staff rather than external consultant’? Further clarification or guidance on this?	English	N/A	Malaysia workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	FPIC	what is the meaning qualified FPIC trained company staff. today there is no formal qualification process for FPIC. Erese wording: It is considered best practice that this FPIC process is carried out internally. by qualified (FPIC-trained) company staff rather than external consultants.	English	N/A	Indonesia workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	Requirements, process, parameters or criteria	“On the basis of this stakeholder engagement process, the boundaries of the proposed new development may be modified prior to commencement of further environmental and social studies.” – doesn’t need to be stated explicitly, may be moved to Step 4	English	N/A	Malaysia workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	Requirements, process, parameters or criteria	2nd line: “Prior to starting...” to be moved to Section 3.2, HCV	English	N/A	Malaysia workshop	revisions make this no longer relevant

Step 2: Identification & engagement of relevant stakeholders	Requirements, process, parameters or criteria	A partir de quel critère considère-t-on qu'une partie-prenante est pertinente ?	French	What criteria are used to consider a stakeholder as relevant?	Gabon workshop	stakeholders already identified in annex of P&C
Step 2: Identification & engagement of relevant stakeholders	Requirements, process, parameters or criteria	El párrafo explicativo del paso 2 debe ser modificado de manera que sea aplicable para escenarios bajo concesión y escenarios bajo propiedad privada. Actualmente lee como que todas las instancias de palma ocurren en áreas concedidas donde hubo o están aún presentes comunidades	Spanish	The explanatory paragraph in step 2 should be modified so that it is applicable to concession scenarios and private ownership scenarios. Currently it reads as though all instances of palm cultivation occur in allocated areas where communities used to live or where they still live.	Colombia workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	Requirements, process, parameters or criteria	Engagement of relevant stakeholders using the FPIC process under Step 2 is overlapping with the SEIA, HCV assessments under Step 3, suggest to merge the text so that this reflects the same whole process done in fulfilling the NPP.	English	N/A	Genting Plantations	Refer to FPIC notes

Step 2: Identification & engagement of relevant stakeholders	Requirements, process, parameters or criteria	Engagement of relevant stakeholders using the FPIC process under Step 2 is overlapping with the SEIA, HCV assessments under Step 3, suggest to merge the text so that this reflects the same whole process done in fulfilling the NPP.	English	N/A	Malaysia workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	Requirements, process, parameters or criteria	La cartographie participative doit être initiée en amont du processus. Elle ne doit cependant pas être nécessairement achevée pour lancer les autres études attendues du processus	French	Participatory mapping must be initiated early in the process. However, It is not necessary to complete it before starting the other studies expected in the process	Gabon workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	Requirements, process, parameters or criteria	Need for laid-down criteria for identifying relevant stakeholders and community representatives? Who should be considered as relevant, especially where there are different decision making bodies within communities?	English	N/A	Ghana workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	Requirements, process, parameters or criteria	Pelibatan pemangku kepentingan tidak sampai diberi ruang memodifikasi batas-batas kawasan yang akan diajukan (berdasarkan terjemahan indonesia). Sedangkan dalam bahasa english adl “maybe...” sehinggamemungkinkan	Bahasa	In stakeholder engagement process no space/allowance is given for modifying boundaries of the proposed area (based on Indonesian version/translation). However, in the English	Indonesia workshop	Refer to FPIC notes

		<p>dimodifikasi.....</p> <p>Paragraph 2 bahwa proses identifikasi terhadap lahan yang dikuasai oleh masyarakat setempat serta hak-hak yang mereka miliki secara umum dapat dilakukan sedangkan secara rinci maka dapat dilakukan pada saat proses negosiasi dan kompensasi sesuai peraturan terkait tahapan peroleh lahan di Indonesia. Untuk penolakan atas lahan yang direncanakan tidak dapat dilakukan pada saat diawal karena ruangnya atau alokasinya dapat dilakukan pada proses negosiasi dan kompensasi dan verifikasi lapangan yang dilakukan oleh panitia pemeriksa tanah (panitia b).</p>		<p>version, it is “may be...”, so that... modification is possible....</p> <p>According to Paragraph 2, process of identification of land held by local community and their rights in general can be done. In detail, it can be carried out during negotiation and compensation processes according to the prevailing regulation on steps of land acquisition in Indonesia. The planned lands cannot be declined at the beginning because the allocated space can be carried out during negotiation, compensation and field verification processes conducted by the Land Verification Committee (Committee B).</p>		
<p>Step 2: Identification & engagement of relevant stakeholders</p>	<p>Requirements, process, parameters or criteria</p>	<p>Pentapan kecukupan kriteria FPIC dalam NPP dinyatakan memenuhi</p>	<p>Bahasa</p>	<ul style="list-style-type: none"> • A set of criteria should be provided to guide that FPIC requirements have been fulfilled 	<p>Indonesia workshop</p>	<p>Refer to FPIC notes</p>

Step 2: Identification & engagement of relevant stakeholders	Requirements, process, parameters or criteria	Propose de mener les EIES en parallèle avec le processus CLIP au lieu d'attendre le bouclage du CLIP avant de commencer les EIES	French	Suggest conducting the ESIA in parallel with the FPIC process instead of waiting for the closure of FPIC before starting the ESIA.	Gabon workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	Requirements, process, parameters or criteria	The growers and the communities should mutually agree on procedures to:	English	N/A	Malaysia workshop	ignore
Step 2: Identification & engagement of relevant stakeholders	Requirements, process, parameters or criteria	The process of consent as an iterative process is not clearly reflected in the NPP document. Final consent may not be possible by the time of submission of the NPP report even though the FPIC process is being properly managed.	English	N/A	Ghana workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	Requirements, process, parameters or criteria	There are instances where some groups and organisations refuse to play a constructive part in the stakeholder engagement process, only to intervene at later stages with issues. In such cases, records of stakeholder engagement should be acceptable as proof of the process.	English	N/A	Ghana workshop	Refer to FPIC notes

Step 2: Identification & engagement of relevant stakeholders	Requirements, process, parameters or criteria	To add in: iv) land use analysis	English	N/A	Malaysia workshop	noted
Step 2: Identification & engagement of relevant stakeholders	Scope and focus	Concern that a comprehensive guidance of FPIC is not available, and the grower is being accused later in the process (after few years) that the FPIC process was not rightly conducted earlier.	English	N/A	Genting Plantations	Refer to FPIC notes

<p>Step 2: Identification & engagement of relevant stakeholders</p>	<p>Scope and focus</p>	<p>Dentro del paso # 2 en donde se menciona que es una buena práctica que “personal de la empresa realiza la consulta libre, previa e informada”, la experiencia nuestra en Guatemala y Honduras es que este tipo de procesos son mejor realizados por consultores externos, no por personal de la empresa.</p> <p>NOTA: Jamás se debe permitir grabar en video (ni por la empresa ni por el consultor) las entrevistas o sesiones de trabajo con los grupos de interés ya que causan intimidación y limitan la libre expresión. RSPO carece de una guía para la realización de los estudios de impacto social lo que permite que cada empresa o grupo de productores lo hagan de manera desorganizada y de manera deficiente.</p> <p>Dentro de los grupo de interés deben involucrarse las Asociaciones comunitarias, Municipalidades, agencias de gobierno pertinentes ambientales y sociales, de presencia con testigos de honor</p>	<p>Spanish</p>	<p>In step 2, where it states that it is good practice for company staff to carry out free, prior and informed consultation, our experience in Guatemala and Honduras shows that these processes are best performed by outside consultants, not by company staff.</p> <p>NOTE: It is never permitted (either for the company or the consultant) to video interviews or working sessions with stakeholders as this can cause intimidation and limit free speech. RSPO lacks guidance for the conduct of social impact studies, allowing each company or growers group to act in a disorganized and unsatisfactory manner.</p> <p>The interest group should bring together community associations, municipalities, government agencies, relevant environmental and social</p>	<p>Solidaridad</p>	<p>Refer to FPIC notes</p>
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		<p>como las fiscalías de Medio Ambiente o representante de los Derechos Humanos. El proceso de consentimiento no debe abarcar solo el asunto legal de la tierra o la existencia de permisos, sino también tomar en cuenta los intereses comunitarios sobre la localización de la futura plantación, el impacto en las vías de acceso, su proximidad a las riveras de los ríos (distancia según RSPO), nacimientos de agua, etc. NO ESTA CLARO ESTA QUE PUNTO LAS COMUNIDADES AFECTADAS PUEDE RECHAZAR LA NUEVA PLANTACION AUN CUANDO NO SON DUEÑOS DE ESA TIERRA. EXISTE CONFLICTIVIDAD EN MUCHOS LUGARES PORQUE LAS PLANTACIONES DE PALMA HAN RODEADO COMUNIDADES LOCALES Y HAN LIMITADO LA LIBRE LOCOMOCION DE LA POBLACION HACIA SUS FINCAS O PARCELAS FAMILIARES.</p>		<p>organizations together with honorary witnesses, such as environmental prosecutors, or human rights representatives. The informed consent process should cover not only the legal issue of the land and the existence of permits, but also take into account community interests on the location of the future planting, the impact on access roads, its proximity to river banks (distance according to the RSPO), water sources, etc. IT IS NOT CLEAR TO WHAT EXTENT AFFECTED COMMUNITIES CAN REJECT THE NEW PLANTING WHEN THEY ARE NOT OWNERS OF THAT LAND. THIS IS A SOURCE OF CONFLICT IN MANY PLACES BECAUSE PALM OIL PLANTINGS HAVE SURROUNDED LOCAL COMMUNITIES AND LIMITED THE FREE MOVEMENT OF THE POPULATION TO THEIR FARMS OR FAMILY PLOTS .</p>		
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Step 2: Identification & engagement of relevant stakeholders	Scope and focus	Incluir proveedores de materiales y servicios, productores asociados o independientes.	Spanish	Include the suppliers of materials and services, and associated or independent growers.	Grepalma	unclear
Step 2: Identification & engagement of relevant stakeholders	Structure	Footnote 2 on FPIC not available (pg 11).	English	N/A	Malaysia workshop	all footnotes removed - incorporated into text
Step 2: Identification & engagement of relevant stakeholders	Structure	Footnote 2 on FPIC not available (pg 11).	English	N/A	Genting Plantations	all footnotes removed - incorporated into text
Step 2: Identification & engagement of relevant stakeholders	Syntax, definitions and terminology	“made aware” - have access to information and advice, that is independent of the project proponent	English	N/A	Malaysia workshop	unclear

Step 2: Identification & engagement of relevant stakeholders	Syntax, definitions and terminology	“User right”: definition	English	N/A	Malaysia workshop	Reference will be to RSPO P&C 2013
Step 2: Identification & engagement of relevant stakeholders	Syntax, definitions and terminology	Hilangkan text yang dihighlight warna biru, karena terlalu detil. Diganti dengan yang lebih sederhana seperti “FPIC sebaiknya mengacu pada pedoman yang ditentukan pada RSPO dan tidak bertentangan dengan peraturan dan perundangan yang berlaku”, sehingga tidak perlu dijelaskan di dokumen NPP.	Bahasa	Remove the blue-highlighted text and change it to the simpler one such as “FPIC should refer to the guidance that has been set by RSPO and does not contradict with any applicable laws and regulations” so that further explanation in NPP document will no longer be necessary.	Indonesia workshop	Noted.
Step 2: Identification & engagement of relevant stakeholders	Syntax, definitions and terminology	Kata “jika” dalam “praktik terbaik dalam hal ini adalah jika.....”	Bahasa	The ‘when’ or ‘jika’ word in ‘best practice in this term is when.....’	Indonesia workshop	Noted.
Step 2: Identification & engagement of relevant stakeholders	Syntax, definitions and terminology	Remplacer le terme « peuple indigène » par « peuple autochtone ».	French	Replace the term "indigenous people" with "aboriginal people".	Gabon workshop	ignore

Step 2: Identification & engagement of relevant stakeholders	Syntax, definitions and terminology	The community engagement and FPIC process should continue during the following steps – change to “NPP Process”	English	N/A	Malaysia workshop	Noted.
Step 2: Identification & engagement of relevant stakeholders	Syntax, definitions and terminology	This is the start of the formal engagement of local communities and indigenous peoples groups, and of the Free, Prior and Informed Consent (FPIC) process. To avoid confusion in some parts of the world the term “native peoples” should be used alongside “indigenous peoples”	English	N/A	WWF	ignore
Step 2: Identification & engagement of relevant stakeholders	Syntax, definitions and terminology	To simplify the sentences i.e. Step 2 is focused on following FPIC procedures to identify and engage relevant stakeholders.	English	N/A	Malaysia workshop	1. AGREE, to add the phrase to the definition 2. In the NI FPIC is translated as Keputusan Bebas Didahulukan dan Diinformasikan. Therefore with the reference to the NI the word "persetujuan" should be change to "Keputusan"

Step 2: Identification & engagement of relevant stakeholders	Syntax, definitions and terminology	Untuk semua penerjemahan FPIC, kata persetujuan diganti dengan ‘keputusan’	Bahasa	For all FPIC translation, ‘persetujuan’ or ‘agreement’ is replaced with ‘keputusan’ or ‘agreement’.	Indonesia workshop	reject
Step 2: Identification & engagement of relevant stakeholders	Technical clarification (timeframe)	Can a company go ahead to submit an NPP report when consultation is still ongoing or wait until consent of communities is obtained before submission? At what point can NPP report be submitted?	English	N/A	Ghana workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	Technical detail	Agar ditetapkan jenis kualifikasi Trainer FPIC	Bahasa	<ul style="list-style-type: none"> The types of FPIC Trainer qualification should be determined 	Indonesia workshop	Refer to FPIC notes
Step 2: Identification & engagement of relevant stakeholders	Technical detail	In the identification of the boundaries, what is applied? Any guidance on this?	English	N/A	Malaysia workshop	permit for development

Step 2: Identification & engagement of relevant stakeholders	Technical detail	Kalimat: "Sebelum memulai kajian sosial & lingkungan.." tidak perlu dicantumkan, karena perusahaan memperoleh IPL, yang meliputi proses participatory mapping.	Bahasa	No need to put this sentence: "Prior to starting the social and environmental studies...." because company obtains IPL that includes participatory mapping process.	Indonesia workshop	to revert
Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	Hacer aclaración si el orden de realizar los estudios requeridos dentro del PNP es a criterio de la empresa o cultivador	Spanish	Clarify if the order for the conduct of the studies required in the NPP is at the discretion of the company or the grower.	Colombia workshop	discretion? NPP compliance is mandatory
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	Mohon diperjelas, apakah memang diperlukan Kajian GRK atau cukup Perhitungan HCS?	Bahasa	Please make clear: is it necessary to carry out GHG study or would HCS Calculation be sufficient?	Indonesia workshop	see ghg assessment procedure

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	<p>N.B. This validity period is not applicable for assessments that are governed and mandated by national legal requirements such as the Environmental Impact Assessment (EIA) in certain countries.</p> <p>This note could cause confusion and should be clarified. It must be made clear that irrespective of legal requirements the full requirements of the P&C and NPP must be met. So even if the law says an old AMDAL does not need to be re-written it does not mean that an old AMDAL meets the NPP requirements.</p>	English	N/A	WWF	see notes on 3 yr validity period - now explained in Table 2
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	No need to review the HCV identification periodically. Strengthening management and monitoring existing HCV areas should be improved. RSPO shall determine what standard/procedure to be applied for management and monitoring.	English	N/A	First Resources	reject

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	As part of the requirements for the responsible development of new oil palm plantings, growers are required to conduct comprehensive, participatory and independent social and environmental studies, prior to establishing new operations, or expanding new ones (where no assessments have yet been conducted).	English	N/A	HCVRN	accept
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	3.3. A land use change analysis to determine changes to vegetation and HCV status since November 2005 should be carried out in parallel with the HCV assessment. This analysis is not required to be carried out by the ALS licensed HCV assessor, but it is recommended that it builds on the conclusions of the other environmental studies, in particular the HCV assessment. The company is encouraged to facilitate the sharing and synthesis of findings from the various studies and assessments.	English	N/A	HCVRN	accept

<p>Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment</p>	<p>Requirements, process, parameters or criteria</p>	<p>3.2. The HCV assessment shall be led by an HCV assessor licensed under the HCV Resource Network (HCVRN) Assessor Licensing Scheme (ALS). The company must verify that the assessor holds a valid license at the time of engagement. The HCV assessment report must be submitted to the ALS quality control system and successfully pass (with satisfactory status) before being submitted as part of the NPP. It is the responsibility of the company to verify the licence status of the HCV assessor at the time they are hired and the status of the HCV report (i.e. whether it has passed the ALS Quality Control System) before submitting it as part of the NPP. This can be done on the HCVRN ALS website.</p> <p>Note that only the HCV team leader requires a ALS license: team members can be licensed under the ALS, but this is not compulsory. If the proposed new development area is less than 500 ha, internal (first party)</p>	<p>English</p>	<p>N/A</p>	<p>HCVRN</p>	<p>accept</p>
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		<p>HCV assessments are allowed by non-licensed assessors.</p> <p>The HCV assessment will evaluate the six categories of HCVs, identify values and specify areas required to maintain or enhance the HCVs identified and will include HCV maps and management recommendations.</p>				
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	Assessment reports submitted for NPP shall not exceed 3 years from the date of report completion	English	N/A	Malaysia workshop	See Table 2
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Smallholders	For groups of independent smallholders with members scattered over wide geographical areas, undertaking the SEIA, HCV and soil assessments would be practically impossible. Same applies to associated outgrowers scattered over wide areas. Specific guidance therefore needs to be provided with more flexible requirements	English	N/A	Ghana workshop	no exemption but guidance is needed

		for undertaking these assessments				
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Smallholders	GHG calculation not clear now for smallholders	English	N/A	Thai stakeholders	no exemption but guidance is needed
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Smallholders; Technical clarification (timeframe)	Bahwa analisis GRK tidak berlaku bagi petani swadaya diwaktu lampau... bagaimana dengan cut of Date?	Bahasa	GHG analysis is not required for independent smallholders in the past. What about the cut-off date?	Setara Jambi	no exemption but guidance is needed

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Syntax, definitions and terminology	'to conduct' should be changed: 'to engage'	English	N/A	Malaysia workshop	ignore
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Syntax, definitions and terminology	"growers are required to conduct comprehensive": specify "comprehensive" requirement.	English	N/A	Malaysia workshop	ignore
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (size area)	Internal assessments are permitted for areas less than 500 ha. Clear guidance needs to be given on the composition of the 500 ha. (e.g. for group of independent smallholders, a total of 500ha; for larger companies, 500 ha under same management unit).	English	N/A	Ghana workshop	Noted.

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	Catatan : laporan kajian diusulkan tidak lebih dari 5 tahun	Bahasa	Note: it is recommended that the assessment report should be valid not more than 5 years.	Indonesia workshop	See Table 2
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Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	<p>Important notes: It was raised that the 3 years validity HCVA report to support the NPP application is not practical for new plantings in existing concessions. We proposed a minimum of 8 years validity with updates of the current landscape and monitoring plan to support the NPP application. The rationale for 8 years (reference year 2005 cut off date) is appropriate as the adoption date for RSPO P&C and many growers embarked on HCVA from 2008 to 2014 .</p> <p>In addition to the EIA, the validity period of the documents, such as FPIC for land acquisition should not be restricted period of validity; soil survey conduct once at the beginning and not limited period of validity; LUCA also should not be limited validity period since the result will be the same.</p>	English	N/A	Inti Indosawit Subur	See Table 2
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Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	<p>IMPORTANT NOTE: Assessment reports submitted for NPP shall not exceed 3 years from the date of report completion.</p> <p>Three years is too long in the context of regeneration of vegetation in the tropics and also in terms of potential changes in social values associated with land. The period should be 1 year only.</p>	English	N/A	WWF	See Table 2
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical detail (scope of HCV assessment)	Intégrer l'étude GES dans l'étude HVC	French	Include GHG study in HCV assessment	Gabon workshop	See Annex 1 for reporting requirements and guidance
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment		The sentence 'growers are required to conduct comprehensive, participatory and independent social and environmental...'	English	N/A	Malaysia workshop	incomplete

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.1: “Internal assessment”: Specify and what is reporting required.	English	N/A	Malaysia workshop	same as external
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.1: Il doit être fait mention que la réglementation la plus contraignante est applicable. Qu’entend-on par « problématiques sensibles » ?	French	On 3.1: It should be indicated that the most stringent regulations apply. What do we mean by "sensitive issues"?	Gabon workshop	Unclear
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.1: Suggest changes in red: to be consistent with Box 1. “The SEIA shall be comprehensive, participatory and led by an independent consultant compliant with the national requirements, if applicable”	English	N/A	First Resources	retain original text

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.1: The sentence ‘an independent consultant’ should be address as ‘fully independent’.	English	N/A	Malaysia workshop	not necessary
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Clarification of area	On 3.1: Bagaimana jika lahan yang dimaksud adalah lahan pribadi, dan APL? Dan secara luasa serta bentangan tidak akan berdampak Lingkungan.	Bahasa	On 3.1: What if the land in question is a private land and APL? In addition, according to its area size and extent it will bring about no impact towards environment.	Setara Jambi	still need NPP unless there are other exclusions

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.1: Kalimat “konsultan independen yang mematuhi persyaratan-persyaratan nasional” sebaiknya dihilangkan, jika ingin dipertahankan maka ditambahkan peraturan tersebut hanya berlaku untuk AMDAL.	Bahasa	On 3.1: This sentence: “independent consultant who complies with national requirements” should be removed. If one would like to maintain the statement, it should be added that the rule applies only to AMDAL.	Indonesia workshop	reject
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.1: “independent consultant compliant with the national requirements” – unclear on what compliant with national requirements means	English	N/A	Malaysia workshop	depends on country - see Table 2 for guidance on assessor qualifications

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.1: “Internal assessment”: Internal assessment will allow growers to claim that there is no significant environment and social sensitive áreas or issue. Could you consider to have the internal assessment peer reviewed by third party to avoid conflict of interest and validate.	English	N/A	Malaysia workshop	no
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.1: Antes de cualquier estudio a realizar, el propietario debe demostrar que tiene titulo de tierra legítimo ante las agencias gubernamentales atinentes.	Spanish	On 3.1: Before any study is carried out the owner must be able to prove to the relevant government agencies that he holds a legitimate title to the land.	Solidaridad	Agreed.

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.1: Bagaimana kualifikasi personil internal yang menyusun SEIA utk luasan 500 Ha	Bahasa	On 3.1: What are the qualifications for internal personnel who prepare SEIA for areas less than 500 hectares?	Indonesia workshop	Refer to table 2.
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.1: Se debería indicar para aquellas evaluaciones que no son de cumplimiento LEGAL y que son de bajo riesgo un mecanismo o términos de referencia para que internamente un representante de la empresa , o el grupo de productores pueda elaborar una evaluación ambiental o social bajo los términos de RSPO	Spanish	On 3.1: For those assessments which are not legally enforceable and which are of low risk, an indication should be provided of mechanisms or terms of reference ensuring that a representative of the company, or group of growers, working internally, can draw up an environmental and social assessment under RSPO terms	Jaremar	See Annex 1 for reporting requirements and guidance

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.1: The SEIA should be separated as EIA and SIA in compliant with respective national regulatory	English	N/A	Malaysia workshop	SEIA is already widely accepted terminology in RSPO
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Syntax, definitions and terminology	On 3.1: Perlu klarifikasi apakah SEIA sama dengan AMDAL	Bahasa	On 3.1: Clarification is necessary on whether SEIA is just the same as AMDAL.	Indonesia workshop	its not the same

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (size area)	On 3.1: Angka 500ha sebaiknya dihilangkan, sebaiknya disebutkan “merujuk kepada P&C NI (jika ada) atau pada peraturan yang ada yang telah disetujui RSPO”	Bahasa	On 3.1: The figure of 50 hectares should be removed and instead it should state “refer to NI P&C (if applicable) or to RSPO-approved rules”.	Indonesia workshop	already addressed
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (size area)	On 3.1: Pengkajian boleh dilakukan secara internal untuk luasan > 3,000 ha, sesuai komentar pada point 1.3	Bahasa	On 3.1: Assessment may be conducted internally for the area size of >3,000 hectares, according to the comment at point 1.3.	Indonesia workshop	already addressed

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (size area); External consistency	On 3.1: Angka 500ha bertentangan dengan draft NI PnC	Bahasa	On 3.1: Figure of 500 ha contradicts with P&C NI draft.	Indonesia workshop	already addressed in previous comments
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical detail	On 3.1: “Where such internal assessments identify significant environmentally or socially sensitive area” – there needs to be a threshold to define significant	English	N/A	Malaysia workshop	

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical detail	On 3.1: Untuk penyusun AMDAL yang disertifikasi secara nasional meskipun internal, mereka dapat menilai tanpa batasan luasan	Bahasa	On 3.1: For preparation of nationally or internally certified AMDAL, they can assess without area limit.	Indonesia workshop	not understood
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.2: Criteria or scope of internal assesment should be added	English	N/A	Thai stakeholders	it should have the same scope as an external one

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.2: Indicar cada cuanto se debe actualizar el estudio de AVC y sobre el seguimiento si es supervisado por el mismo asesor de AVC	Spanish	On 3.2: Indicate how frequently the HCV study must be updated and, with regard to the follow-up, whether this is supervised by the same HCV assessor.	Grepalma	If an HCV report is older than 3 years, it must be updated before submission with NPP (not necessarily by the same assessor because must be a ALS licensed assessor)
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.2: There is not a guide for internal assessments.	English	N/A	NES Naturaleza	See Annex 1 for reporting requirements and guidance

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation; Requirements, process, parameters or criteria	On 3.2: - Pertanyaan dari grower: o Apakah internal lead assessor juga memerlukan ALS? Tidak dijelaskan sehingga perlu di elaborasi dalam panduan.	Bahasa	On 3.2: Question from growers: o Does internal lead assessor also require ALS? This is not explained so it needs to be elaborated in the guidance.	Indonesia workshop	Yes and refer to Table 2
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.2: Consider to provide Qualification for the internal assessor.	English	N/A	Malaysia workshop	See Table 2

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.2: Bagaimana kualifikasi personil internal yang menyusun HCV utk luasan 500 Ha	Bahasa	On 3.2: What are the qualifications for internal personnel who prepare HCV assessment for areas less than 500 hectares?	Indonesia workshop	See Table 2
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.2: Cette disposition exclue les évaluateurs nationaux	French	On 3.2: This provision excludes national assessors	Gabon workshop	HCV assessment must be done by ALS assessors

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.2: Cuales son los terminus de referencia para que alguien interno , pueda hacer la evaluacion de avc	Spanish	On 3.2: What are the terms of reference under which an insider can carry out the HCV assessment?	Jaremar	text already there
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.2: Ditegaskan yang dimaksud dengan Internal Assessor (<500 Ha) apakah boleh tidak sebagai ALS.	Bahasa	On 3.2: To confirm that Internal Assessor (<500 hectares) need not have ALS	Indonesia workshop	please see notes on this with regards to Indonesia NI

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.2: En deçà de 500ha, l'étude est faite en interne, mais nécessite-t-elle un évaluateur ALS ?	French	On 3.2: Below 500ha, the study is done internally, but does it require an ALS assessor?	Gabon workshop	no unless explicitly said so in NI
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.2: It is not clear that internal assessments do not need a licensed consultant leader. Should be clearly stated.	English	N/A	NES Natureza	See Table 2

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.2: Los estudios de EISE deberán ser realizados por asesores o consultores independientes y debidamente registrados por las agencias estatales.	Spanish	On 3.2: SEIA studies must be carried out by assessors or independent consultants who are duly registered by state agencies.	Solidaridad	Agreed.
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.2: Siapa yang akan melakukan kajian LUC? Siapa yang akan bayar untuk petani swadaya? Apakah juga berlaku bagi lahan-lahan APL? Apakah tepat jika persyaratan diatas 2005 untuk petani swadaya?	Bahasa	On 3.2: Who will conduct LUCA? Who will pay for the costs of LUCA for independent smallholders? Does it also apply to APL lands? Is it appropriate that requirements after 2005 apply to independent smallholders?	Setara Jambi	it applies

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Structure	On 3.2: Box on right covers both 3.2 and 3.3; should be moved down	English	N/A	Malaysia workshop	boxes have changed - no longer relevant
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (size area)	On 3.2: Angka 500ha sebaiknya dihilangkan, sebaiknya disebutkan “merujuk kepada P&C NI (jika ada) atau pada peraturan yang ada yang telah disetujui RSPO”	Bahasa	On 3.2: The figure of 50 hectares should be removed and instead it should state “refer to NI P&C (if applicable) or to RSPO-approved rules”.	Indonesia workshop	already addressed in similar comments

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (size area)	On 3.2: If a larger management unit is found to be split up in smaller units (<500 ha) to avoid the obligation to mobilize licensed assessors, then	English	N/A	Aidenvironment	this is not allowed, text makes this clear
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<p>Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment</p>	<p>Technical clarification (size area)</p>	<p>On 3.2: The HCV assessment shall be led by an HCV lead assessor licensed under the HCV Resource Network (HCVRN) Assessor Licensing Scheme. Note that only the HCV team leader requires a license: team members can be licensed under the HCVRN ALS, but this is not compulsory. If the proposed new development area is less than 500 ha, internal assessments are allowed. The HCV assessment will identify areas required to maintain or enhance one or more High Conservation Values (HCVs) and will include a management plan to do so.</p> <p>The text underlined should be removed. There is not a universal provision in the generic P&Cs that areas below 500ha do not need an independent HCV assessment – it only appears in some NIs. It must not be established as acceptable procedure via the NPP.</p>	<p>English</p>	<p>N/A</p>	<p>WWF</p>	<p>not accepted</p>
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Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (size area); External consistency	On 3.2: - Angka 500 ha bertentangan dengan draft NI Indonesia yang menyatakan angka (threshold) 3000 ha	Bahasa	On 3.2: Figure of 500 ha contradicts with Indonesia's NI draft which states a figure (threshold) of 3000 ha	Indonesia workshop	already addressed in similar comments
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	On 3.2: Only HCV assessments conducted after 1 Jan 2015 need to be licensed under HCVRN ALS. Assessments conducted from 1 Jan March 2010 to 1 Dec 2014 by RSPO-approved assessors, should be recognised. HCV Assessment prior to March 2010 may be conducted internally or externally.	English	N/A	[Source has got lost]	clear in NPP

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical detail	<p>On 3.2: Cuando las evaluaciones sean internas, se piden alguna formación mínima o cualidades para la personas que los realice o la empresa será la encargada de definir quien será el responsable de hacerlo y esta evaluación tendrá que se aceptada por el auditor. Los términos de referencia para una evaluación interna son los mismos que los que usa un consultor externo</p>	Spanish	<p>On 3.2: When assessments are internal, there will be a request for some minimal training or qualifications for those persons carrying them out, or the company will be tasked with determining who should be responsible for making the assessments and these assessments will have to be accepted by the auditor. The terms of reference for an internal assessor are the same as those used by an external consultant.</p>	Grepalma	we maintain the current text on competency
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical detail	<p>On 3.2: Le plan de gestion HVC devrait être compris dans le PGES (et non indépendant)</p>	French	<p>On 3.2: The HVC management plan should be included in the environmental and social management plan (ESMP) (and not kept separate)</p>	Gabon workshop	we maintain the current format

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.3: Is there a need to mention satellite images to be used? More for non oil palm companies reading this document?	English	N/A	Hutan	no, too specific (already in P&C guidance notes)
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.3: S'agit-il d'une analyse cartographique du changement du couvert forestier et/ou du changement d'affectation (caractère légale) des terres.	French	On 3.3: Is it a mapping analysis of the change in forest cover and/or the change in land use (legal) in the area?	Gabon workshop	land cover
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.3: • It is strongly recommended that historical land cover analysis, rather than land use analysis should be required since it is more practical to obtain this data	English	N/A	Ghana workshop	Please check LUCA requirement

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.3: To clearly define who is responsible to carried out the analysis of land use?	English	N/A	Malaysia workshop	grower's responsibility
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Scope and focus	On 3.3: It is extremely expensive and technically difficult (especially in our system of poor record-keeping) to do a historical land use assessment as far back as 2005. This must be appreciated in order to manage realistic expectations	English	N/A	Ghana workshop	Please check LUCA requirement
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Structure	On 3.3: Disarankan dibuat FAQ (Q and A) untuk menjawab beberapa pertanyaan yang mungkin muncul	Bahasa	On 3.3: It is suggested to compile Frequently Asked Questions (FAQ) and answers for questions that might arise.	Indonesia workshop	FAQ would be good but not as part of the NPP document

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (size area)	On 3.3: It is not specified clearly whether LUC analysis is applicable for areas less than 500ha	English	N/A	Malaysia workshop	yes it is
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (size area)	On 3.3: It is not specified clearly whether LUC analysis is applicable for areas less than 500ha.	English	N/A	Genting Plantations	yes it is
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	On 3.3.: New P&C only come to force in April 2013, hence Land Use Change Analysis is only applicable for HCV assessment after April 2013	English	N/A	Musim Mas	No, that's not how it works

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	On 3.3: Incluir la opción de poder demostrar históricamente si el área que se va a sembrar en palma viene de un uso agropecuario diferente anterior a esa fecha (noviembre 2005).	Spanish	On 3.3: Include the option to demonstrate historically if the area which is to be planted with palms had been under a different agricultural use prior to that date (November 2005).	Colombia workshop	what would be the added implication or value with this addition?
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	On 3.3: Grower, memerlukan klarifikasi teknis untuk menjawab pertanyaan: - apakah diperlukan LUC jika HCV assessment dilakukan sebelum diberlakukan PnC 2013?	Bahasa	On 3.3: Growers need technical clarification to answer: - Is LUC needed if HCV assessment was carried out before P&C 2013 was in effect?	Indonesia workshop	Agreed
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	On 3.3: In some countries, eg Liberia and possibly other African countries, land use data since November 2005 may not be available. It is proposed that in such cases the most recent available data applies.	English	N/A	Inti Indosawit Subur	Please check LUCA requirement

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	On 3.3: Requiring landuse change analysis as far back as 2005 is not practical and realistic. A more realistic timeline should be considered	English	N/A	Ghana workshop	Refer to P&C 2013.
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical detail	On 3.3: "HCV status since November 2005 should be carried out in parallel with the HCV assessment": What about those growers already carried out HCV without LUCA? Can they do separately from HCV assessment?	English	N/A	Malaysia workshop	Agreed.
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical detail	On 3.3: In some countries, eg Liberia and possibly other African countries, Land Use data since November 2005 may not be available. It is proposed that in such cases the most recent available data.	English	N/A	Indonesia workshop	Please check LUCA requirement

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.4: Perlu ditelaah lebih lanjut mengenai kebutuhan dari point tersebut	Bahasa	On 3.4: Whether the point is necessary should be further reviewed.	Indonesia workshop	necessary
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Smallholders	On 3.4: Apakah berlaku bagi petani swadaya? Melakukan SEIA pada lahan ringkih secara terpisah?	Bahasa	On 3.4: Does it apply to independent smallholders? Carrying out SEIA on vulnerable soils separately?	Setara Jambi	Agreed
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Smallholders	On 3.4: Considerar que estos análisis son de altos costos , en el caso de pequeños productores se puede considerer informacion de empresas que han realizado este analisis y que el proyecto a desarrollar esta cerca de la empresa	Spanish	On 3.4: Given that these analyses are very costly it could be possible, in the case of smallholders, to use information from companies that have carried out such analyses, when the project being developed is in the vicinity of the company	Jaremar	yes but that is the arrangement between the smallholders and company and provided the information is relevant for sharing

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (size area)	On 3.4: Is this by internally for 500ha & below?	English	N/A	Malaysia workshop	Agreed
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (size area)	On 3.4: It is not specified clearly whether soil suitability and topographic is applicable for areas less than 500ha	English	N/A	Genting Plantations	applicable
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (size area)	On 3.4: It is not specified clearly whether soil suitability and topographic is applicable for areas less than 500ha.	English	N/A	Malaysia workshop	applicable

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical detail (riparian)	<p>On 3.4. The soil suitability and topographic survey should identify all areas of marginal and fragile soils as well as areas too steep to plant and areas requiring appropriate practices in order to be planted.</p> <p>Riparian buffers should be specified as an 'area not to be planted'.</p>	English	N/A	WWF	The sentence "Riparian buffers are not to be planted" is stated in the document. (pg 13)
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical detail (scope of ESIA)	On 3.4: Intégrer l'enquête sur l'aptitude des sols et étude topographique dans les EIES	French	On 3.4: Include soil suitability and topographical survey in the ESIA	Gabon workshop	regardless, summary results must be presented as per Annex 1
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical detail (scope of ESIA)	On 3.4: Soil suitability & topographic surveys shall not be parked as a separate requirement, as these surveys are already included in the HCV assessment and SEIA.	English	N/A	Malaysia workshop	as long as its there

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical detail (soil)	On 3.4: 'Fragile soils' should be defined in the National Interpretations of the RSPO P & C since what could be considered as fragile differs from location to location	English	N/A	Ghana workshop	see P&C 2013
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.5: • Berapa threshold yang diperkenankan untuk dapat dibuka kebun	Bahasa	On 3.5: • How many thresholds are allowed for opening a plantation?	Indonesia workshop	no threshold
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.5: Ajouter la possibilité de combiner l'évaluation des stocks de carbone avec l'EIE (et pas seulement les HVC).	French	On 3.5: Add the possibility of combining the assessment of carbon stocks with the EIA (and not just the HCV).	Gabon workshop	the company and assessors can choose how they want to integrate the assessments as long as the information and quality is not compromised. RSPO is not going to be overly prescriptive about this - see Annex 1

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.5: Dipertegas yang dimaksud Assessment Report of NPP	Bahasa	On 3.5: Confirm what this term means: 'Assessment Report of NPP'.	Indonesia workshop	noted
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.5: Need for clear distinction between HCS assessment and GHG assessment since they refer to different concepts	English	N/A	Ghana workshop	see ghg assessment procedure
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.5: Specific guidance is required on the methodology for conducting the carbon stock assessment	English	N/A	Ghana workshop	see ghg assessment procedure

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.5: Tambahan untuk catatan agar jelas diusulkan menjadi: Laporan kajian yang digunakan untuk penyusunan NPP dst.....	Bahasa	On 3.5: For clearer note, it is suggested to revise: Assessment report that is used to prepare NPP etc....	Indonesia workshop	Noted.
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.5: What is the GHG accounting methodology that applies for selection of internal/external assessors?	English	N/A	Malaysia workshop	see ghg assessment procedure
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	On 3.5: What is the threshold of 'high' in high carbón stocks? How many tonnes per hectare?	English	N/A	Ghana workshop	no threshold

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	External consistency	On 3.5: • Dalam P&C yang baru menginformasikan bahwa public notification untuk GHG baru akan berlaku pada tahun 2017 namun didalam dokumen NPP sudah diharus terinformasikan	Bahasa	On 3.5: • According to the new P&C, requirement of GHG public notification will start to take effect in 2017, but the NPP document already requires this information.	Indonesia workshop	Agreed
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Graphics	On 3.5: Guidance needed to show the relations between GHG Assessment, Carbon Stock Assessment, HCV Assessment and LUC Analysis. Preferably in a Schematic diagram.	English	N/A	Malaysia workshop	should be clear now how all are required and how elements can be combined. See Table 2 and Step 3
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.5: What is the GHG accounting methodology that applies for selection of internal/external assessors.	English	N/A	Genting Plantations	see ghg assessment procedure

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.5: "IMPORTANT NOTE: Assessment reports submitted for NPP shall not exceed 3 years from the date of report completion": if exceeded what the grower should do?	English	N/A	Malaysia workshop	subject to review and update if necessary - see Step 3
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.5: Carbon stock thresholds should be determined by National Interpretations	English	N/A	Ghana workshop	yes but so far no NI has done so
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.5: For submission of the LUC and GHG emission evaluation in compliance with criterion 7.8, the growers will submit the report directly to the ERWG.	English	N/A	Musim Mas	it is already explained in document

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.5: It is the responsibility of the grower to select and appoint competent assessors as per the requirements above. - to add line "Refer to Box 1 on assessor competency"	English	N/A	Malaysia workshop	accept
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.5: The timeframe of 3 years should consider the scale and intensity of the project, larger size of area being assessed should also be considered as the FPIC process may take longer timeframe than expected. Smaller areas may require less time, and larger area may involve greater timeframe/resources.	English	N/A	Malaysia workshop	see Table 2
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.5: Tidak perlu diberikan batas waktu antara laporan pengkajian dan pelaporan NPP	Bahasa	On 3.5: No need to provide time limit between assessment report and NPP report.	Indonesia workshop	see Table 2

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	On 3.5: We propose uses HCV Assessment Report with New updates of the current HCV management and monitoring Report	English	N/A	Sinar Mas	not clear
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Scope and focus	On 3.5: Consideration of specific circumstance where there is disruption to operations which may last for more than 3 years, e.g. natural disaster, war, diseases outbreak, political instability.	English	N/A	Genting Plantations	see Table 2
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Scope and focus	On 3.5: Consideration of specific circumstance where there is disruption to operations which may last for more than 3 years, e.g. natural disaster, war, diseases outbreak, political instability.	English	N/A	Malaysia workshop	see Table 2

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Scope and focus	On 3.5: L'évaluation des GES doit porter sur les activités développées par le projet, et non sur l'ensemble du paysage (qui peut comporter d'autres sources à GES non imputables au projet).	French	On 3.5: The assessment of GHGs must cover the activities developed by the project and not the entire landscape (which may include other GHG sources not attributable to the project).	Gabon workshop	includes associated development
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Smallholders	On 3.5: Dalam prinsip yang lalu, petani swadaya belum diwajibkan hal ini, mengenai GRK	Bahasa	On 3.5: Based on the previous principles independent smallholders were not required for this matter, concerning GHG.	Setara Jambi	see notes on smallholders
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Smallholders	On 3.5: Should have some reference to smallholder requirements in each point.	English	N/A	Malaysia workshop	noted

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Structure	On 3.5: Footnote 3 not available.	English	N/A	Genting Plantations	footnotes are incorporated into text now
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Structure	On 3.5: Footnote 3 not available.	English	N/A	Malaysia workshop	footnotes are incorporated into text now
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Structure	On 3.5: This step (HCS) is said to combine well with step 3.2 (HCV). Possibly this can be better reflected in the sequence of the text. 3.1-.5-.2-.3-.4.	English	N/A	Oxfam	noted

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Syntax, definitions and terminology	On 3.5: “N.B. This validity period is not applicable for assessments that are governed and mandated by national legal requirements such as the Environmental Impact Assessment (EIA) in certain countries” Vague statement, requires clarification to ensure it does not represent a loophole.	English	N/A	Aidenvironment	see Table 2
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (size area)	On 3.5: It is not specified clearly whether the greenhouse gas (GHG) assessment is applicable for areas less than 500ha.	English	N/A	Genting Plantations	there is no minimum threshold for size

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (size area)	On 3.5: It is not specified clearly whether the greenhouse gas (GHG) assessment is applicable for areas less than 500ha.	English	N/A	Malaysia workshop	there is no minimum threshold for size
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (size area)	On 3.5: What about 500ha and below?	English	N/A	Malaysia workshop	as above

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	On 3.5: Suggest to put 5-6 years for the validity of the assessment, or the assessment shall be subjected to partial review (not full review), flexibility should always be considered.	English	N/A	Genting Plantations	see Table 2
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	On 3.5: The timeframe of 3 years should consider the scale and intensity of the project, larger size of area being assessed should also be considered as the FPIC process may take longer timeframe than expected. Smaller areas may require less time, and larger area may involve greater timeframe/resouces.	English	N/A	Genting Plantations	see Table 2

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	On 3.5: Assessment report (HCV, SIA, GHG) tidak dibatasi waktu dengan 3 tahun, namun dapat dengan dilakukan update / review ulang	Bahasa	On 3.5: Assessment reports (HCV, SIA and GHG) should not be limited with a 3-year period. Instead, they can use re-updating/re-review.	Indonesia workshop	see Table 2
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	On 3.5: It was raised that the 3 years validity HCVA report to support the NPP application is not practical for new plantings in existing concessions. We proposed a minimum of 8 years validity with updates of the current landscape and monitoring plan to support the NPP application. The rationale for 8 years (reference year 2005 cut off date) is appropriate as the adoption date for RSPO P&C and many growers embarked on HCVA from 2008 to 2014	English	N/A	Indonesia workshop	see Table 2

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	On 3.5: Suggest to put 5-6 years for the validity of the assessment, or the assessment shall be subjected to partial review (not full review), flexibility should always considered.	English	N/A	Malaysia workshop	see Table 2
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	On 3.5: The proposed three (3) years validity of the HCVA report to support the NPP application is not practical for new plantings in existing concessions. We propose a minimum of eight (8) years validity for the HCVA reports done with new updates of the current HCV management and monitoring report to support the NPP application. The rationale for the proposed eight (8) years being appropriate is the trial and adoption date for RSPO P&C (Yr 2005 to Yr 2007 date) and many growers embarked on HCVA from 2008 to 2014.	English	N/A	GAR	see Table 2

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	On 3.5: The proposed three (3) years validity of the HCVA report to support the NPP application is not realistic for new plantings in existing concessions	English	N/A	Sinar Mas	see Table 2
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical detail	On 3.5: • Belum menginformasikan metodologi yang digunakan untuk menentukan stok karbon. Metode yang diusulkan berupa indentifikasi kasar menggunakan citra landsat	Bahasa	On 3.5: • Yet to inform the methodology employed in determining carbon stock. The recommended method is rough identification using Landsat imagery.	Indonesia workshop	ghg assessment procedure

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical detail	On 3.5: Citing a study of vegetation already included in the LUC creates confusion.	English	N/A	NES Naturaleza	unclear
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical detail	On 3.5: N.B selain AMDAL, grower juga mempertanyakan soal masa berlaku dokumen-dokumen, seperti FPIC untuk pembebasan lahan. Dokumen tersebut harusnya tidak dibatasi masa berlakunya; soil survey dilakukan satu kali diawal dan tidak dibatasi masa berlakunya; LUCA juga sebaiknya tidak dibatasi masa berlakunya.	Bahasa	On 3.5: In addition to AMDAL, growers also question the effective date of several documents such as FPIC for land acquisition. The effective date of such document should not be limited; soil survey is carried out once in the beginning and the effective date of which should not be limited; the effective date of LUCA should also not be limited.	Indonesia workshop	already addressed in similar commens

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical detail (GHGs)	On 3.5: Is there RSPO GHG procedure specific for New Planting?	English	N/A	Malaysia workshop	Agreed.
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<p>Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment</p>	<p>Technical detail (GHGs)</p>	<p>On 3.5: The greenhouse gas (GHG) assessment⁵ should (i) identify and estimate carbon stocks and major potential sources of emissions in the proposed development area and (ii) include a plan to minimise net GHG emissions as a result of the planned development using the RSPO GHG Assessment Procedure for New Oil Palm Planting. The carbon stock assessment can be combined with the vegetation survey carried out as part of the HCV assessment and LUC analysis. Note that the purpose of using the GHG assessment is to identify areas that upon development will have high emissions and to compare emissions and carbon stocks before- and after planting (for the purpose of decision making on go- and no-go areas). We do not really see this reflected in the current text (see the text of the GHG assessment procedure). Note also that ‘emissions’ and ‘carbon stocks’ are different issues. E.g. a drained peat soils emits continuously high</p>	<p>English</p>	<p>N/A</p>	<p>Wetlands International</p>	<p>Noted.</p>
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		<p>amounts of GHG's, but does not lose a lot of carbon at once (over a period of time, yes...). While cutting a high density forest may not lead to large emissions, but leads to a large – one point- carbon loss. We prefer this reflected more clear in the text in general.</p>				
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Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add more specific detail or explanation	Paragraph 1 in Bahasa Version. There is a need to provide more detailed explanation of the documents that complement the NPP (SEIA, HCV assessment, LUCA, suitability of soil and topographic surveys, GHG studies) for the period of validity of the document.	English	N/A	Inti Indosawit Subur	noted
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Add something	Topography survey and LUC not listed in the paragraph.	English	N/A	Malaysia workshop	noted

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	External consistency	Paragraph 1 in Bahasa Version: 2. Figures 500ha is opposed to P&C of NI draft.	English	N/A	Inti Indosawit Subur	already addressed in other comments
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Internal consistency	Survey kesesuaian lahan, topografi & jenis tanah sudah termasuk dalam kajian HCV 3&4.2. Apakah perlu dibuatkan laporan tersendiri?	Bahasa	Suitability survey for land, topography and soil types is already included in HCV 3 & 4.2 assessment. Will it be necessary to make it in another report?	Indonesia workshop	regardless, summary results must be presented as per Annex 1

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	Paragraph 1 in Bahasa Version: SEIA document , can be prepared by assessor who has competency and recognized by the goverment. They can do assessment for area more than 3000 Ha	English	N/A	Inti Indosawit Subur	we retain the same text on competency
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	Paso 3. EISA, evaluación de AVC, análisis LUC, idoneidad del suelo y levantamiento topográfico y estimación de GEI. Estas evaluaciones deberán ser compartidas y discutidas con las instituciones nacionales pertinentes a efecto de tener un dictamen favorable o bien por lo menos informar de los hallazgos para evitar futuras reclamaciones o inconformidades.	Spanish	Step 3. SEIA, HCV assessment, LUC analysis, soil suitability, topographic survey and GEI assessment. These assessments should be shared and discussed with relevant national institutions in order to obtain a favourable opinion or at least report the findings to avoid future complaints or disagreements.	Solidaridad	noted

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Requirements, process, parameters or criteria	Revisar los requisitos de competencia para evaluadores internos, pues son muy altos, da la sensación de ser más exigentes que para un evaluador líder de EISA	Spanish	Revise the competency requirements for internal assessors, as they are at present very high, apparently even more demanding than the requirements for an SEIA lead assessor.	Colombia workshop	we retain the same text on competency
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Structure	Step 3 lists a number of elements that in natural fact would be part of an integral land use planning exercise. We suggest considering an overarching name for this process which combines and balances all elements, without any of the elements – e.g. HCS - taking a higher importance over others	English	N/A	Oxfam	we cannot introduce new terminology and concepts

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Syntax, definitions and terminology	Revisar la palabra debería, puesto que queda como opcional y no mandatorio	Spanish	Revise the word "should", given that this remains optional and not mandatory.	Colombia workshop	what does this refer to?
Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Syntax, definitions and terminology	Seharusnya didefinisikan secara tertulis di daftar istilah	Bahasa	Should be defined in the glossary.	Indonesia workshop	what should be defined?

Step 3: SEIA, HCV assessment, LUC analysis, soil suitability & topographic survey & GHG assessment	Technical clarification (timeframe)	Regarding the “IMPORTANT NOTE: Assessment reports submitted for NPP shall not exceed 3 years from the date of report completion”, this seems like a very long time. Is there an argument why the validity should not be much shorter, e.g., within 6 or 9 months?	English	N/A	Credit Suisse	see Table 2
Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input

<p>Box 1: Guidance on competency of assessors</p>	<p>Add more specific detail or explanation</p>	<p>Box 1 could be improved by including guidance for all kinds of assessors (SEIA, HCV, soil/topo, LUC, carbon and GHG and clearly differentiating requirements for 1st party or 3rd party assessors.</p> <p>Box 1. Guidance on competency of assessors: SEIA The SEIA shall be led by an independent consultant compliant with the national requirements and contracted directly by the grower. In countries where there is no clear national requirement on SEIA lead assessors, a competent independent lead assessor should have conducted at least 3 SEIAs and have knowledge of the relevant laws. In the cases of proposed developments where internal environmental and social assessments are permitted (see Section 1 How is the NPP implemented?), a competent internal assessor, or the person responsible for leading the environmental and social assessments internally, should</p>	<p>English</p>	<p>N/A</p>	<p>HCVRN</p>	<p>Box has been replaced by Table 2</p>
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	<p>have:</p> <ul style="list-style-type: none"> • Conducted at least 3 assessments (either SEIA, HCV or carbon); and • Expertise with remote sensing and mapping <p>HCV</p> <p>The HCV assessment shall be led by an HCV lead assessor licensed under the HCV Resource Network (HCVRN) Assessor Licensing Scheme (ALS). See the HVRN ALS website for a list of current assessors.</p> <p>LUC – any guidance? Or just: This analysis is not required to be carried out by the HCV licensed assessor</p> <p>Soil and topography studies – any guidance on who or just: It can be carried out as part of the SEIA or separately.</p> <p>Carbon stock and GHG For GHG assessments, the RSPO Emission Reduction Working Group (ERWG) has developed the following guidance: The assessors whether internal or external (or a combination) should be able to form a team with the following collective competencies:</p>				
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	<ul style="list-style-type: none">• Have knowledge of carbon emission accounting methodologies for above and below ground carbon stocks including peat• Have experience in verifying land cover maps and/or conducting carbon stock assessment in agriculture and/or forestry sectors• Have experience and expertise in using appropriate remote sensing technology to estimate carbon stocks				
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Box 1: Guidance on competency of assessors	Add more specific detail or explanation	Not clear if and how these competency guidance elements will be applied by ASI. As noted in the general comment on page 2, the effectiveness of NPP depends on the quality of implementation and verification, including auditors competence.	English	N/A	Oxfam	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Add more specific detail or explanation	Please give guidance for the competency of assessors including internal assessors	English	N/A	Malaysia workshop	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Add more specific detail or explanation	What is the guidance for assessors (internal or external) for LUCA and the soil suitability and topo survey?	English	N/A	First Resources	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	A combination whether person or team experience in fulfilling the criteria should be allowed to conduct the SEIA and GHG assessment or other relevant assessments.	English	N/A	Malaysia workshop	Box has been replaced by Table 2

Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	“a competent internal assessor, or the person/team responsible for leading the environmental and social assessments internally, should have: <ul style="list-style-type: none"> • Conducted at least 3 assessments (either SEIA, HCV or carbon); and • Expertise with remote sensing and mapping” *The group found that it would be very hard to find a person with both assessment experience and expertise with remote sensing and mapping	English	N/A	Malaysia workshop	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	A combination whether person or team experience in fulfilling the criteria should be allowed to conduct the SEIA and GHG assessment or other relevant assessments.	English	N/A	Genting Plantations	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	Bagaimana dengan kompetensi Internal untuk SEIA? Apakah ada kompetensi khusus?	Bahasa	What about internal competence concerning SEIA? Are particular competences required?	Setara Jambi	Box has been replaced by Table 2

Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	Competent internal assessor – RSPO P&C requirements earlier only allowed RSPO approved assessors for ANY assessments. Therefore not many internal capabilities to do so, perhaps this requirement can be waived for the first 3 years should internal expertise is not available.	English	N/A	Genting Plantations	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	Competent internal assessor – RSPO P&C requirements earlier only allowed RSPO approved assessors for any assessments. Therefore not many internal capabilities to do so, perhaps this requirement can be waived for the first 3 years should internal expertise is not available.	English	N/A	Malaysia workshop	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	Conducted “at-least 3 assessment”: What about for internal assessment	English	N/A	Malaysia workshop	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	Due to limited expertise in remote sensing, it is difficult to fulfil the requirements for competent internal assessor. Requirements shall be minimised to past experiences in conducting assessments	English	N/A	Malaysia workshop	Box has been replaced by Table 2

Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	El personal interno no está tan calificado para realizar un estudio, no tiene acreditación ni perfil de consultor externo. La descripción debería estar definida en términos de perfil profesional con formación en temas relacionados. El personal interno puede aplicar otra metodología, menos exigente, como por ejemplo, un diagnóstico, matriz, análisis	Spanish	Internal staff are not competent to carry out such a study, having no accreditation or external consultant status. The job description should be defined in terms of a professional profile, with training in related topics. Internal staff can carry out other, less demanding, exercises, such as a diagnostic study, matrix or analysis.	Colombia workshop	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	In Bahasa Version Requirements for lead assessors to have specific relevant studies (remote sensing, HCV, Carbon and LUCA) should not be a requirement on SEIA assessment. It is hard to find the availability of such assessor.	English	N/A	Inti Indosawit Subur	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	In Thailand, it's quite difficult to find assessor as defined in this box	English	N/A	Thai stakeholders	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	Le personnel responsable de l'évaluation doit avoir au moins une qualification en évaluation environnementale	French	The staff responsible for the assessment must have at least one qualification in environmental assessment.	Gabon workshop	Box has been replaced by Table 2

Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	Les prérequis techniques d'une évaluation interne ne doivent pas nécessairement s'appliquer à 1 seule personne. Une équipe devrait pouvoir être éligible (formée d'un carto, d'un spécialiste en télédétection, etc.)	French	The technical prerequisites of an internal assessment do not necessarily need to be applied to one single person. A team should be eligible (made up of a cartographer, a remote sensing specialist, etc.)	Gabon workshop	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	Los evaluadores deben ser siempre independientes para evitar conflicto de intereses y mayor objetividad del proceso.	Spanish	Assessors should always be independent to avoid conflict of interest and to ensure the greater objectivity of the process.	Solidaridad	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	O estar avalado por el ministerio correspondiente. No debe ser requisito haber realizado 3 EISA pues no refleja competencia, solo experiencia. Si está registrado significa que está capacitado por lo tanto conoce la legislación	Spanish	Or to be endorsed by the relevant ministry. There should be no requirement for having conducted three SEIAs as this does not reflect competence, only experience. If the assessor is registered, this means that he is competent and at least he knows the legislation.	Grepalma	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	Persyaratan untuk lead assesor khususnya keahlian pada bidang penginderaan jauh dan pemetaan agar dibuat spesifik sesuai dengan kajian yang relevan (NKT, Karbon dan LUCA) tidak harus menjadi persyaratan pada kajian SEIA.	Bahasa	Requirements for lead assessor, particularly for remote sensing and mapping expertise, should be specified according to relevant assessment (HCS, Carbon and LUCA) and should not become	Indonesia workshop	Box has been replaced by Table 2

				requirement for SEIA assessment.		
Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	Prácticamente las evaluaciones internas debrar ser por Expertos Competentes y eso no lo tienen las empresas ni los pequeños productores. Debería recomendarse que pueden ser realizados por técnicos de las empresas con un grado técnico y guiados por una metodología, de lo contrario sigue siendo caro el proceso y dejan en desventaja a los pequeños productores que tienen poco apoyo, para este proceso	Spanish	From a practical point of view, internal assessments must be conducted by competent experts and neither the companies nor the smallholders have this expertise. It is recommended that the assessments be carried out by company experts who have a technical degree and are following a methodology, otherwise the process will remain costly and leave smallholders at a disadvantage as they have little support for this process	Jaremar	Box has been replaced by Table 2

Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	<p>Suggest to reword:</p> <p>In the cases of proposed developments where internal environmental and social assessments are permitted (see Section 1 How is the NPP implemented?), a competent internal assessor(s), or the person/team responsible for leading the environmental and social assessments internally, should have collective competencies:</p> <ul style="list-style-type: none"> • Conducted at least 3 assessments Have knowledge in environmental and social studies (either SEIA, HCV or carbon); and • Expertise Have knowledge on remote sensing and mapping <p>Comments: Expertise is hard to measure/no benchmark</p>	English	N/A	Genting Plantations	Box has been replaced by Table 2
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Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	Suggest to reword: In the cases of proposed developments where internal environmental and social assessments are permitted (see Section 1 How is the NPP implemented?), a competent internal assessor(s), or the person/team responsible for leading the environmental and social assessments internally, should have collective competencies: - Conducted at least 3 assessments (either SEIA, HCV or carbon); and - Expertise with knowledge on remote sensing and mapping Comments: Expertise is hard to measure	English	N/A	Malaysia workshop	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	The document does not clarify the required competence of the reviewing CBs, whose delivery on NPP reviews has been far below reasonable expectations. !) Are CBs explicitly accredited for NPP Review under the RSPO-ASI program? If not, they must be. !) What happens if an NPP was verified by a CB who is de-accredited later on?	English	N/A	Aidenvironment	Box has been replaced by Table 2

Box 1: Guidance on competency of assessors	Requirements, process, parameters or criteria	Would be strengthened if it included text on the requirement for HCVRN ALS licensed assessors. Given a history of poor and patchy implementation of the NPP the RSPO should consider making CB competence to assess NPP compliance a part of ASI accreditation.	English	N/A	WWF	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Scope and focus	In countries where there are national requirements on SEIA assessor competencies, only registered assessors to be used.	English	N/A	Malaysia workshop	Box has been replaced by Table 2
Box 1: Guidance on competency of assessors	Syntax, definitions and terminology	Paragraph kedua poin ketiga untuk diganti kata “berpengalaman” menjadi “mempunyai keahlian”	Bahasa	Term ‘experienced’ at the third point of the second paragraph should be replaced with ‘skilled’.	Indonesia workshop	Box has been replaced by Table 2
Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Step 4	Add more specific detail or explanation	Further explanation needed on what it means by ‘sequestration options’.	English	N/A	Genting Plantations	not for NPP document
Step 4	Add more specific detail or explanation	Se debe indicar que se capacitara o informara a las partes interesadas sobre las recomendaciones , controles y seguimiento de cada plan , esto con la población laboral	Spanish	It should be specified that stakeholders, together with the working population, are given the necessary skills and information on the recommendations,	Jaremar	is this necessary to specify?

				controls and monitoring of each plan.		
Step 4	Add more specific detail or explanation	The subsequent bullet points should include a new one: <ul style="list-style-type: none"> Identify areas not to be planted including excessive slopes and riparian buffers. 	English	N/A	WWF	accept
Step 4	Add more specific detail or explanation	To clarify what it means by adverse impacts (to specify the degree), Whether this should be referred to the RSPO P&C definition, or company's SOP. What kind of impact is this referring to, environmental, social etc?	English	N/A	Genting Plantations	not accepted
Step 4	Add more specific detail or explanation	To clarify what it means by adverse impacts (to specify the degree), whether this should be referred to the RSPO P&C definition, or company's SOP. What kind of impact is this referring to, environmental, social etc?	English	N/A	Malaysia workshop	not accepted

Step 4	FPIC	<p>Planning and management of proposed operations shall include:</p> <ul style="list-style-type: none"> • Maps of the findings of the SEIA and HCV assessment, primary forests identification, carbon stock assessment, and identification of marginal and fragile soils including peat and areas too steep to plant. [See Annex 1 for guidance on maps]. • An action plan describing operational actions consequent to the findings of the SEIA, HCV, carbon, GHG, & marginal and fragile soils (including peat and areas too steep to plant) assessments, referencing the grower's relevant operational procedures. • Maps and action plans should include clear reference to the documented FPIC process including any negotiated outcomes and outstanding issues. 	English	N/A	HCVRN	accept
Step 4	FPIC	Par 3, second bullet: please remove FPIC map, there is no FPIC map.	English	N/A	Indonesia workshop	Accept

Step 4	Internal consistency	Results and recommendations drawn from the SEIA, HCV assessment, soil suitability and topographic survey, LUC, carbon and GHG assessments and FPIC process are incorporated into planning, management and operations of the new plantings and related developments that: The term defined in the glossary is ASSOCIATED developments – it should be used instead of ‘related’ and consistently.	English	N/A	WWF	Accept
Step 4	Requirements, process, parameters or criteria	Concernant la planification et la gestion des opérations : les cartes demandées doivent se rapporter à la carto participative plutôt qu’au CLIP.	French	Concerning the planning and operations management: the required maps must relate to participatory mapping rather than FPIC.	Gabon workshop	isnt participatory mapping part of FPIC?
Step 4	Requirements, process, parameters or criteria	Définir les mesures de sanction en cas de défaillance dans la mise en œuvre des plans de gestion	French	Set sanctions or penalties in the event of failure to implement a management plan.	Gabon workshop	being explored
Step 4	Requirements, process, parameters or criteria	Le plan d’action doit pouvoir être évolutif, car certains résultats seront obtenus a posteriori (CLIP par exemple).	French	The action plan should evolve over time, as some results will be obtained a posteriori (for example, FPIC).	Gabon workshop	noted

Step 4	Requirements, process, parameters or criteria	Mieux définir les composantes du CLIP et permettre que le PNP puisse être délivré avant que le CLIP n'ait atteint le contrat social (qui ne sera obtenu que plusieurs mois après).	French	Better define the components of FPIC and allow for the NPP to be issued before the FPIC has resulted in the "social contract" (which will only be achieved after several months).	Gabon workshop	see notes on FPIC
Step 4	Requirements, process, parameters or criteria	Réaliser les mises à jour périodiques des plans de gestion issus des différentes études	French	Carry out regular updates of management plans from different studies	Gabon workshop	unclear
Step 4	Requirements, process, parameters or criteria	Los resultados deben haber sido comunicados y acordados con los públicos interesados	Spanish	The results should have been communicated and agreed on with public stakeholders.	Grepalma	this is FPIC
Step 4	Requirements, process, parameters or criteria	Se debe considerar que en los planes se indique la socialización con las partes interesadas , ong, comunidades , grupos indígenas, gobiernos locales, población laboral ,para que ellos estén informados y puedan ser parte de esos planes, ya que de lo contrario es muy difícil la implementación .	Spanish	Consideration should be given to ensuring that the plans include a process of consultation with stakeholders, NGOs, communities, indigenous groups, local governments, and the working population, so that they can be informed and can play a role in those plans, as their implementation would otherwise be very problematic.	Jaremar	this is FPIC

Step 4	Requirements, process, parameters or criteria (national legality)	Untuk Penanaman pada lahan gambut apakah berpedoman pada peraturan perundangan Indonesia tentang lahan gambut?	Bahasa	Does planting on peatland refer to Indonesian peatland laws and regulation?	Indonesia workshop	refers to NI
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Step 4	Scope and focus	<p>The current text ‘Results and recommendations drawn from the SEIA, HCV assessment, soil suitability and topographic survey, LUC, carbon and GHG assessments and FPIC process are incorporated into planning, management and operations of the new plantings and related developments’ completely misses one of the main purposes: the decision on whether or not to develop the plantation in the proposed area. Including the decision to allocate certain areas as set-aside areas.</p> <p>One of the main purposes of all these assessments is to see which areas are (1) HCV, (1) not suitable for development (2) not long-term viable for development (3) emission hot-spots upon development. Based on this (new) knowledge resulting from the assessments a grower can decide which areas will be set-aside and which areas will be developed</p>	English	N/A	Wetlands International	Accept, text reflected in Step 4
Step 4	Structure	FPIC ditempatkan di bagian paling awal sebelum SEIA, Kajian NKT dsb.	Bahasa	FPIC is placed at the very beginning before SEIA, HCV assessment, etc.	Indonesia workshop	unclear

Step 4	Syntax, definitions and terminology	General; For all translated FPIC, please replace “agreement” with “decision”	English	N/A	Inti Indosawit Subur	not accepted
Step 4	Syntax, definitions and terminology	How is ‘extensive’ being defined? Whether using the RSPO P&C 2013 or National Interpretation or company’s SOP	English	N/A	Genting Plantations	Refer to P&C 2013 and respective country’s NI
Step 4	Syntax, definitions and terminology	How is ‘extensive’ being defined? Whether using the RSPO P&C 2013 or National Interpretation or company’s SOP.	English	N/A	Malaysia workshop	Refer to P&C 2013 and respective country’s NI
Step 4	Syntax, definitions and terminology	Le terme « vaste surface » est-il définit ?	French	In the term "large area" defined?	Gabon workshop	not clear
Step 4	Syntax, definitions and terminology	Page 14. Paragraph 1. Third bullet. In Bahasa Version; To change “hutan primer” to “area HCV”	English	N/A	Inti Indosawit Subur	not accepted. Hutan primer is primary forest

Step 4	Syntax, definitions and terminology	To clarify 'An action plan describing operational actions consequent to the findings of the SEIA, HCV, carbon, GHG, FPIC & marginal and fragile soils (including peat and areas too steep to plant) assessments, referencing the grower's relevant operational procedures.' – Sentence is too long, 'Referencing the grower's relevant operational procedures' is meant for the action plan or assessments?	English	N/A	Genting Plantations	not accepted
Step 4	Syntax, definitions and terminology	To clarify 'An action plan describing operational actions consequent to the findings of the SEIA, HCV, carbon, GHG, FPIC & marginal and fragile soils (including peat and areas too steep to plant) assessments, referencing the grower's relevant operational procedures.' – Sentence is too long, 'Referencing the grower's relevant operational procedures' is meant for the action plan or assessments?	English	N/A	Malaysia workshop	not accepted
Step 4	Syntax, definitions and terminology	Untuk semua penerjemahan FPIC, kata persetujuan diganti dengan 'keputusan'	Bahasa	For all FPIC translation, 'persetujuan' or 'agreement' is replaced with 'keputusan' or 'agreement'.	Indonesia workshop	not accepted

Step 4	Syntax, definitions and terminology	Wording “Avoid”: Give option “Not to avoid”. Consider give guidance.	English	N/A	Malaysia workshop	not clear
Step 4	Technical detail	Langkah 4 Point keempat diubah menjadi : “menghindari penanaman meluas di lahan curam, sesuai dengan yang diatur dalam peraturan nasional, dan/atau tanah marjinal atau ringkih, termasuk gambut sesuai dengan yang diatur dalam peraturan nasional, serta menyediakan pengelolaan yang sesuai bagi tanah-tanah semacam ini untuk melindunginya dari dampak-dampak yang tidak dikehendaki”	Bahasa	Step 4 under Point 4 should be altered to the following: “to avoid extending planting on steep areas, according to the applicable national regulations, and/or marginal or vulnerable soils including peat, according to the applicable national regulations, and to provide relevant protection to such soils in order to prevent against undesired impacts.”	Indonesia workshop	not accepted
Step 4	Technical detail (HCs and GHGs)	High carbon stock is mentioned in this step but the definition and methodology has yet to be finalised and widely accepted, hence users are not clear how this is being implemented, suggest to refer to definition under RSPO P&C 7.8.1 2013. How do users ‘minimise net GHG emission’ also needs to be made clear, suggest to refer to RSPO P&C 7.8.2 2013.	English	N/A	Genting Plantations	refer to ghg assessment procedure

Step 4	Technical detail (HCS)	High carbon stock is mentioned in this step but the definition and methodology has yet to be finalised and widely accepted, hence users are not clear how this is being implemented, suggest to refer to definition under RSPO P&C 7.8.1 2013. How do users 'minimise net GHG emission' also needs to be made clear, suggest to refer to RSPO P&C 7.8.2 2013.	English	N/A	Malaysia workshop	refer to ghg assessment procedure
Step 4	Technical detail (HCV)	"Provide for the maintenance and/or enhancement of all identified HCV areas": consider to be specific as identified HCV areas in HCV Assessment Report.	English	N/A	Malaysia workshop	No question / comment found.
Step 4	Technical detail (steep terrain)	"too steep area": give guidance which are considered as steep area.	English	N/A	Malaysia workshop	generic document, so ignore
Step 4	Technical detail (steep terrain)	Define 'extensive planting on steep terrain and/or maginal and fragile soils'. What scale could be considered as extensive?	English	N/A	Ghana workshop	its already explained in P&C
Step 4	Technical detail (steep terrain)	Further explanation needed on what it means by 'sequestration options'.	English	N/A	Malaysia workshop	not meant for elaboration under NPP

Step 4	Technical detail (steep terrain)	Steep terrain (under fourth bullet point) should be clearly defined (degree of steepness?) is this being defined internally by companies? Suggest to standardise to above 25 degree or to follow national requirements.	English	N/A	Malaysia workshop	generic document. Noted.
Step 4	Technical detail (steep terrain)	Steep terrain (under fourth bullet point) should be clearly defined (degree of steepness?) is this being defined internally by companies? Suggest to standardised to above 25 degree or to follow national requirements	English	N/A	Genting Plantations	generic document. Noted.
Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Step 5	FPIC	Current wording (paragraph 2): “The FPIC process shall be documented at this point, and a full social agreement may still be under negotiation” Propose rewording: “The FPIC process shall be documented, and a full social agreement may still be under negotiation”	English	N/A	Musim Mas	please see notes on FPIC

Step 5	Graphics	Page 16. Bahasa Version Suggested to make verification box for separate flow chart to show the role of CB in the verification and submission of the NPP to the RSPO	English	N/A	Inti Indosawit Subur	Noted.
Step 5	Graphics	Suggest to insert a flow chart componenet to clearly mention the roles of the parties that needs to do the NPP Notification statement; Summary of Assessment Reports (SEIA, HCV, soil, topography, LUC, carbon stock and GHG emissions); Summary of management plans. E.g. who should prepare the summary of management plans?	English	N/A	Malaysia workshop	Grower has ultimate responsibility

Step 5	Graphics	<p>Suggest to insert a flow chart component to clearly mention the roles of the parties that needs to do the NPP Notification statement; Summary of Assessment Reports (SEIA, HCV, soil, topography, LUC, carbon stock and GHG emissions); Summary of management plans. E.g. who should prepare the summary of management plans?</p> <p>LUC, carbon stock and GHG emission has not yet been finalised and properly established, RSPO to consider the implication of these assessments during the NPP process. Suggest for a trial period/timeframe (until Jan 2017) to allow the carbón stock and GHG emission approach to be completed by the ERWG.</p> <p>Meantime, the socialisation of this document should be done to reach a wider audience, not limited to the public consultation. Further guidance needed for growers to apply/implement this procedure.</p>	English	N/A	Genting Plantations	Grower has ultimate responsibility
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Step 5	Public awareness	Meantime, the socialisation of this document should be done to reach a wider audience, not limited to the public consultation. Further guidance needed for growers to apply/implement this procedure.	English	N/A	Malaysia workshop	noted
Step 5	Requirements, process, parameters or criteria	<p>Current wording (paragraph 5): “Note that the CB may waive the need for field verification if evidence can be shown that the area cannot be accessed”</p> <p>Propose rewording: “Where accessibility to the new concession is restricted due to land tenure, customary or legal constraints, field verification may be waived upon the CB’s agreement”</p>	English	N/A	Musim Mas	can be added to guidance on how to assess waiving field verification

Step 5	Requirements, process, parameters or criteria (add more detail on ALS; remove FPIC)	The appointed accredited RSPO CB should undertake a documentation and field verification, in order to assess: <ul style="list-style-type: none"> • The accuracy of the proposed development boundaries as per the maps submitted; • That the SEIA was carried out following national requirements; • That the HCV assessment was conducted by an ALS licensed assessor and that the report passed the HCVRN ALS quality control system before being submitted as part of the NPP; • The comprehensiveness and quality of all studies carried out; • The legal ownership or lease of the land tenure; 	English	N/A	HCVRN	added text on CB verification
Step 5	Syntax, definitions and terminology	Clarificar el concepto de productor y diferenciar cuándo se refiere a gestor de grupo	Spanish	Clarify the concept of grower and make a distinction between it and that of group manager.	Colombia workshop	Noted.
Step 5	Syntax, definitions and terminology	Title Step 4:management and monitoring plans but 5.1 bullet point 3	English	N/A	Malaysia workshop	unclear

Step 5	Technical detail	LUC, carbon stock and GHG emission has not yet been finalised and properly established, RSPO to consider the implication of these assessments during the NPP process. Suggest for a trial period/timeframe (until Jan 2017) to allow the carbon stock and GHG emission approach to be completed by the ERWG.	English	N/A	Malaysia workshop	please see notes on suggested enforcement date
Step 5	Internal consistency	On 5.1: Soil topography shall be removed (under the list of Summary of assessment reports)	English	N/A	Malaysia workshop	not accepted
Step 5	Internal consistency	On 5.1: Summary of assessment report should not include LUC, carbon stock and GHG emissions. Since the The LUC, carbon stock and GHG emission report in compliance with C. 7.8 is sent as stand alone report to the ERWG. This is described in the box 2 (public reporting) already.	English	N/A	Musim Mas	noted
Step 5	Syntax, definitions and terminology	Reporting: Based on the various studies and assessment reports, the grower is responsible to collate the NPP report following a standard reporting format.	English	N/A	HCVRN	Accept

Step 5	Add more specific detail or explanation	On 5.2: “The company or grower is responsible for appointing an accredited RSPO Certification Body (CB) who will assign an RSPO-endorsed lead auditor to lead the assessment process”: consider consistency to wording “RSPO P&C Certification Body (CB)”	English	N/A	Malaysia workshop	not accepted
Step 5	Add more specific detail or explanation	On 5.2: Apakah CB harus diakreditasi oleh RSPO bukan ASI? Selama ini ASI Apa yang maksud seorang penilai Kepala harus disahkan oleh RSPO?	Bahasa	On 5.2: Is the CB being accredited by RSPO or ASI? It has been ASI. What does it mean: ‘an RSPO-endorsed lead auditor’?	Indonesia workshop	ASI
Step 5	Add more specific detail or explanation	On 5.2: CBs may waive the need for field verification. This text leaves too much room for interpretation. It is not clear which evidence is needed and which reasons are valid to waive the need for field work. This needs elaboration and specification.	English	N/A	Oxfam	addressed in similar comment
Step 5	Add more specific detail or explanation	On 5.2: Dans les bullet points, indiquer que l’on évalue « les progrès » du CLIP et non le CLIP lui-même	French	On 5.2: Using bullet points, show that we assess progress made on the FPIC, and not the FPIC itself.	Gabon workshop	see notes on FPIC
Step 5	Add more specific detail or explanation	On 5.2: Especificar que el envío de la información pública se puede hacer en el idioma nativo o nacional.	Spanish	On 5.2: Specify that public information can be submitted either in the	Colombia workshop	addressed in similar comment

			local vernacular or the national language.		
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<p>Step 5</p>	<p>Add more specific detail or explanation</p>	<p>On 5.2: Further to this, there is a need for greater clarity as to what is expected when RSPO refers to verification and proof of “consent” prior to submission of NPP. There can be evidence shown that the process of obtaining community consent is underway prior to CB verification and NPP submission but full consent can only be confirmed once the MOU or Social Agreements have been signed. This is recognised in para 2 of 5.2 that “a full social agreement may still be under negotiation” It is recommended that the text throughout should be reworded to indicate that the grower must demonstrate that the FPIC process is under way and that communities have clearly indicated an interest in oil palm development and have consented to begin negotiations with the grower on such potential developments.</p> <p>This point should also be reflected in the reporting template in Annex 1, specifically on point 1.2.2.</p>	<p>English</p>	<p>N/A</p>	<p>Indonesia workshop</p>	<p>see notes on FPIC</p>
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<p>Step 5</p>	<p>Add more specific detail or explanation</p>	<p>On 5.2: The appointed accredited RSPO CB should undertake a documentation and field verification, in order to assess:</p> <ul style="list-style-type: none"> • ... • That the SEIA was carried out following national requirements; <p>It must be made clear that the 'national requirements' are those in the P&Cs that are established in the relevant NIs rather than any national regulatory requirements alone.</p>	<p>English</p>	<p>N/A</p>	<p>WWF</p>	<p>revised accordingly</p>
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Step 5	Add more specific detail or explanation	<p>On 5.2: There is a need for clarity to the verification and proof of “consent” prior to submission of NPP. There can be evidence shown that the process of obtaining community consent is underway prior to CB verification and NPP submission but full consent can only be confirmed once the MOU or Social Agreements have been signed. This is recognised in para 2 of 5.2 that “a full social agreement may still be under negotiation”.</p> <p>We propose to revise the text to indicate that the grower must demonstrate that the FPIC process is under way and that communities have clearly indicated an interest in oil palm development and have consented to begin negotiations with the grower on such potential developments. This point should also be reflected in the reporting template in Annex 1, specifically on point 1.2.2.</p>	English	N/A	GAR	see notes on FPIC
Step 5	Add more specific detail or explanation	On 5.2: What constitutes a comprehensive and quality study/report? How is this measured?	English	N/A	Malaysia workshop	see proposed CB guidance

Step 5	Add more specific detail or explanation	On 5.2: What constitutes a comprehensive and quality study/report? How is this measured? The CB cannot decide whether the study report is comprehensive or good quality as this is beyond their scope. HCV reports are governed by HCVRN. Other respective studies are submitted/reviewed by the respective bodies/authorities as well. CB only check for availability of documents only.	English	N/A	Genting Plantations	see proposed CB guidance
Step 5	Add more specific detail or explanation (CBs)	<p>On 5.2: Note that the CB may waive the need for field verification if evidence can be shown that the area cannot be accessed.</p> <p>This would be strengthened if there was some sort of guidance as to what sorts of situations could prevent access to a site and also a requirement for justification for the decision. The concern is that a CB could unilaterally decide not to verify without a strong reason. If such safeguards or guidance is not possible then this provision should be dropped.</p>	English	N/A	WWF	already addressed in other comments

Step 5	Certifying bodies and consultants	On 5.2: The role of the CB could be to ensure, primarily via documentation review, that all the necessary processes leading to the NPP public notification has been complied to.	English	N/A	GAR	noted
Step 5	Graphics	On 5.2: Disarankan dibuat box verifikasi untuk flow chart secara terpisah untuk menunjukkan peran CB dalam verifikasi dan pengajuan NPP ke RSPO	Bahasa	On 5.2: It is suggested to create a separate verification box for flow chart to show CB's role in NPP verification and submission to RSPO.	Indonesia workshop	dealt with in Step 5
Step 5	Requirements, process, parameters or criteria	On 5.2: It is recommended that in countries where there are no accredited CBs, the external CBs contracted should appoint a local expert to undertake the field verification in order to reduce cost to growers	English	N/A	Ghana workshop	this is possible and we have stated as such
Step 5	Requirements, process, parameters or criteria	On 5.2: It is recommended that the field verification should be scrapped, except where there are very significant social or environmental issues	English	N/A	Ghana workshop	not accepted

Step 5	Requirements, process, parameters or criteria	On 5.2: The appointment of a CB should be done jointly by the grower and local stakeholders. When the grower unilaterally appoints the CB, there could be some suspicion from stakeholders. Even though unilateral appointment of CB by the grower may not influence the findings, it could still be difficult for other stakeholders to fully trust the results	English	N/A	Ghana workshop	this is not in our system
Step 5	Requirements, process, parameters or criteria	On 5.2: The HCV RN ALS would have covered the quality of the assessment and peer reviewed process as the primary mechanism to ensure the credibility of the reports.	English	N/A	GAR	noted
Step 5	Requirements, process, parameters or criteria	On 5.2: The requirements to combine desk-based review and field verification would entail additional cost for growers. If HCV assessment is conducted by a licensed assessor, there is no need for verification since the quality is assured per the quality control safeguards of the HCV Resource Network. No additional value is added by field verification by the CB	English	N/A	Ghana workshop	noted

Step 5	Requirements, process, parameters or criteria	<p>On 5.2: The verification responsibilities of the CB seems to have increased significantly. There needs to be recognition of significant incremental cost and implementation delays resulting of this change, particularly in countries where CBs are not physically present, like Liberia.</p> <p>Since there are already strict new provisions to quality control the assessment process [such as (a) requirements for engaging certified, independent HCV and SEIA assessors (b) now far more stringent processes in place for assessor certification (eg HCVRN-led), (c) automatic required HCVRN internal peer review,] requiring a third assessment by CBs to verify the work of such assessors seems excessive and redundant. It is proposed that the work of the assessors be accepted and the prevailing practices of peer review for continued certification of assessors be the primary mechanism to ensure the credibility of the reports. The role of the CB could be to ensure, primarily via</p>	English	N/A	Indonesia workshop	noted
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		<p>documentation review, that all the necessary processes leading to the NPP public notification has been complied to.</p>				
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Step 5	Requirements, process, parameters or criteria	On 5.2: The addition of field verification for the NPP is adding costs for growers who are already paying for field assessments conducted by independent SEIA and HCV assessors who are recognised/approved by RSPO. Moreover, field audit will be conducted by the RSPO CB at point of certification audit.	English	N/A	First Resources	noted
Step 5	Requirements, process, parameters or criteria	On 5.2: Suggest that 'RSPO CB should undertake a documentation and/or field verification' as HCV, SEIA, FPIC, carbon assessments has already been conducted on the ground. Moreover, HCV assessors are now licensed and monitored by the HCV RN-ALS/RSPO. The assessors are credible and capable to carry out the assessments independently. Flexibility should be considered in this context.	English	N/A	Malaysia workshop	Stated in the NPP document Step 5.2
Step 5	Requirements, process, parameters or criteria	On 5.2: Verification of the quality of the report should be in place.	English	N/A	Malaysia workshop	noted

Step 5	Requirements, process, parameters or criteria	On 5.2: 4th sentence: accredited RSPO CB should only undertake documentation verification. (field verification shall not be required) given reason that HCV assessors are ALS certified (highly competent) hence, field verification is not needed.	English	N/A	Malaysia workshop	Stated in the NPP document Step 5.2
Step 5	Requirements, process, parameters or criteria	On 5.2: Agar pilhan Verifikasi Dokumen atau Lapangan tetap berlaku	Bahasa	On 5.2: The option of either Document or Field Verification should remain applicable.	Indonesia workshop	Stated in the NPP document Step 5.2
Step 5	Requirements, process, parameters or criteria	On 5.2: Considerar que la verificación del PNP lo haga directamente la unidad encargada en la RSPO (donde se reportan estos proyectos) y que la validación la haga un ente certificador al momento de la auditoría de certificación. De lo contrario sería un costo adicional a la empresa	Spanish	On 5.2: Consider the idea of NPP verification being carried out directly by the unit directly assigned this responsibility in the RSPO (where these projects are reported) and that validation is done by a certifying body at the time of the certification audit. Otherwise there would be an additional cost to the company.	Colombia workshop	Noted
Step 5	Requirements, process, parameters or criteria	On 5.2: Es contradictorio el indicar que el OC renuncie a la necesidad de verificar en campo al demostrar que la zona no es accesible	Spanish	On 5.2: It is contradictory to suggest that the CB may waive the need for field verification if evidence can be shown that that the area is not accessible.	Grepalma	Noted and guidance text is proposed

Step 5	Requirements, process, parameters or criteria	On 5.2: Is there a list for RSPO – approved lead auditor?	English	N/A	Genting Plantations	No.
Step 5	Requirements, process, parameters or criteria	On 5.2: L'OC a obligation de vérification de terrain pour la rencontre avec les communautés locales et autres parties prenantes locales	French	On 5.2: The CB is required to conduct verification in the field by meeting local communities and other local stakeholders	Gabon workshop	proposed in CB verification guidance
Step 5	Requirements, process, parameters or criteria	On 5.2: Remover del alcance de la verificación el consentimiento de las comunidades locales y los pueblos indígenas (ni como proceso ni documentación)	Spanish	On 5.2: Remove the need to obtain consent from local communities and indigenous peoples as part of the verification process (both the field and documentation process).	Colombia workshop	not accepted
Step 5	Requirements, process, parameters or criteria	On 5.2: Revisar la conveniencia de mantener el criterio de renunciar a verificar en campo únicamente por que la zona es inaccesible. Si tal es el caso quizá amerite con mayor razón ir al campo dado el riesgo de hacer una afectación significativa. Considerar una opción que faculte a la OC a decidir si entra o no a campo	Spanish	On 5.2: Review the desirability of retaining the option of waiving the need for field verification only when the area is inaccessible. If this is the case it may make more sense to go into the field given the risk of making a significant impact. Consider the option of giving the CB the right to decide whether or not to enter the field.	Colombia workshop	Noted and agreed. Text for CB verification revised

Step 5	Requirements, process, parameters or criteria	On 5.2: Suggest that 'RSPO CB should undertake a documentation and/or field verification' as HCV, SEIA, FPIC, carbon assessments has already been conducted on the ground. Moreover, HCV assessors are now licensed and monitored by the HCV RN-ALS/RSPO. The assessors are credible and capable to carry out the assessments independently. Flexibility should be considered in this context.	English	N/A	Genting Plantations	Noted and agreed. Text for CB verification revised
Step 5	Requirements, process, parameters or criteria	On 5.2: The Certification body should be able to waive visit if by doing spatial research he determines that the new expansion is in prohibited area.	English	N/A	NES Naturaleza	Text for CB verification is proposed

Step 5	Requirements, process, parameters or criteria	<p>On 5.2: There have been instances where the CB reported that the applicant decided to “opt” for a no-field visit NPP review, and the CB simply accepted this.</p> <p>It should be clarified that field verification is not merely doing a document review in the estate office compound or a field trip entertained by the company to locations of its own choice. The CB must be required to conduct well-informed problem focused field checks.</p> <p>“waive the need for field verification if evidence can be shown that the area cannot be accessed” This offers a loophole that perpetuates previous malpractice (‘area cannot be accessed in view of cost’)</p>	English	N/A	Aidenvironment	Noted and agreed. Text for CB verification revised
Step 5	Requirements, process, parameters or criteria	<p>On 5.2: Verification of the quality of the report should be in place.</p>	English	N/A	Genting Plantations	noted
Step 5	Requirements, process, parameters or criteria	<p>On 5.2: We propose 2 (two) options for verification audit : document verification “or” field verification</p>	English	N/A	Sinar Mas	not accepted. Stated in the NPP document Step 5.2

Step 5	Requirements, process, parameters or criteria (CBs)	<p>On 5.2: The verification responsibilities of the CB seems to have increased significantly. There needs to be recognition of significant incremental cost and implementation delays resulting of this change, particularly in countries where CBs are not physically present, like Liberia.</p> <p>Since there are already strict new provisions to quality control the assessment process (such as (a) requirements for engaging certified, independent HCV and SEIA assessors (b) now far more stringent processes in place for assessor certification (eg HCVRN-led), (c) automatic required HCVRN internal peer review] requiring a third assessment by CBs to verify the work of such assessors seems excessive and redundant. It is proposed that the work of the assessors be accepted and the prevailing practices of peer review for continued certification of assessors be the primary mechanism to ensure the credibility of the reports. The role of the CB could be to ensure, primarily via</p>	English	N/A	Inti Indosawit Subur	Noted and agreed. Text for CB verification revised and please see FPIC notes to address the FPIC issue
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	<p>documentation review, that all the necessary processes leading to the NPP public notification has been complied to.</p> <p>Further to this, there is a need for greater clarity as to what is expected when RSPO refers to verification and proof of “consent” prior to submission of NPP. There can be evidence shown that the process of obtaining community consent is underway prior to CB verification and NPP submission but full consent can only be confirmed once the MOU or Social Agreements have been signed. This is recognised in para 2 of 5.2 that “a full social agreement may still be under negotiation” It is recommended that the text throughout should be reworded to indicate that the grower must demonstrate that the FPIC process is under way and that communities have clearly indicated an interest in oil palm development and have consented to begin negotiations with the grower on such potential developments.</p>				
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		<p>This point should also be reflected in the reporting template in Annex 1, specifically on point 1.2.2.</p>				
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Step 5	Requirements, process, parameters or criteria (wildlife)	On 5.2: CB should also check against orang-utan range map once made available by PONGO Alliance	English	N/A	Hutan	too specific to include in NPP
Step 5	Scope and focus	On 5.2: With the enhanced NPP, please be mindful on the incremental CB costs.	English	N/A	GAR	noted
Step 5	Syntax, definitions and terminology	On 5.2: “...CB should be documented and properly reported...”: consider rewording properly to reported as per NPP requirement.	English	N/A	Malaysia workshop	revisions make this no longer relevant
Step 5	Syntax, definitions and terminology	On 5.2: The appointed accredited RSPO CB should undertake a documentation and field verification, in order to assess: Please consider wording “verify”	English	N/A	Malaysia workshop	not clear
Step 5	Syntax, definitions and terminology	On 5.2: “.....RSPO-endorsed lead auditor to lead the assessment process”: Please consider to rewording as verification process	English	N/A	Malaysia workshop	agreed.

Step 5	Syntax, definitions and terminology	On 5.2: “Note that the CB may waive the need for field verification if evidence can be shown that the area cannot be accessed: This will allow grower an excuse to avoid field verification. If cannot access, how did the HCV assessment was carried out. Consider give specific situations which can be considered as cannot access. It is important to carry out the field verification. “May waive” will give room for negotiations and compromise.	English	N/A	Malaysia workshop	agreed. Guidance text is now provided
Step 5	Syntax, definitions and terminology	On 5.2: professional quality: consider to define professional quality.	English	N/A	Malaysia workshop	not accepted
Step 5	Syntax, definitions and terminology	On 5.2: The company or grower is responsible for appointing an accredited RSPO Certification Body (CB) who will assign an RSPO-endorsed lead auditor to lead the assessment verification process.	English	N/A	Malaysia workshop	yes
Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Box 2: ‘Public Reporting’	Add more specific detail or explanation	Compte-rendu standard de la NPP ???	French	Standard NPP report???	Gabon workshop	Not clear

Box 2: 'Public Reporting'	Internal consistency	To preferably use Internationally recognised terms consistently. o 'full social agreement' to what extent? Please be precise o Condition of areas that can't be accessed on the ground'... To include some examples for clarity. o 'The findings from the CB should be documented and properly reported to grower' to be rephrased. Proposed: 'The findings from the CB shall be documented and reported to the grower'.	English	N/A	Malaysia workshop	Noted.
Box 2: 'Public Reporting'	Requirements, process, parameters or criteria	Con fines de mantener la Transparencia, el reporte debe ser obligatoriamente de carácter y acceso público. Debe eliminarse el párrafo que dice se recomienda encarecidamente.	Spanish	In order to maintain transparency, the report absolutely must be of a public nature and accessible to the public. The paragraph stating that this is strongly recommended should be deleted.	Solidaridad	what is the strongly recommended referring to?
Box 2: 'Public Reporting'	Requirements, process, parameters or criteria	Note that the CB may waive the need for field verification if evidence can be shown that the area cannot be accessed. o Would this evidence need to be approved by RSPO?	English	N/A	Malaysia workshop	Guidance on waiving field verification now in Step 5

Box 2: 'Public Reporting'	Requirements, process, parameters or criteria	Under 5.2: ... the RSPO-endorsed Lead Auditor... Will there be a specified list available?	English	N/A	Malaysia workshop	No
Box 2: 'Public Reporting'	Syntax, definitions and terminology	Box 2: Public Reporting of carbon stock and GHG emissions	English	N/A	HCVRN	Accept
Box 2: 'Public Reporting'	Syntax, definitions and terminology	Under 5.2: o 'the grower is to obtain...' amended to 'grower shall provide..' 'must' amended to 'shall' o 'should' to mean 'current best practices ' o 'may' to mean 'optional'	English	N/A	Malaysia workshop	agree that terms need to be used coconsistently, shall, should and may
Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Box 3: 'Conflict of Interest'	Add more specific detail or explanation	Not clear if and how this issue will be applied by ASI in approving and monitoring CBs. As noted in the general comment on page 2, the effectiveness of NPP depends on the quality of implementation and verification, including meaningful audits.	English	N/A	Oxfam	NPP is now part of the ASI accreditation process but the NPP document is not the place to explain this in detail

Box 3: 'Conflict of Interest'	Add more specific detail or explanation	Text is not clear on whether: - CBs who carry out SEIA/HCV assessments can still do the NPP verification - CBs who carry out SEIA/HCV assessments/NPP verification can still do RSPO certification audit? They CANNOT or only have to „demonstrate no conflict of interest“?	English	N/A	First Resources	This is covered in Box 5
Box 3: 'Conflict of Interest'	Requirements, process, parameters or criteria	Conflict of interest should consider the time frame that can be considered as “no conflict of interest” similar to RSPO Certification System.	English	N/A	Malaysia workshop	Noted.
Box 3: 'Conflict of Interest'	Requirements, process, parameters or criteria	Este párrafo es correcto, sin embargo, desde el momento en que el Productor Interesado le paga por los servicios al OC este ya tiene un sesgo o conflicto. El Productor debería pagar a un fondo del RSPO y luego este al OC al terminar el servicio en la calidad esperada. Por supuesto, el productor solicita el servicio a un OC pero deposita el pago a la RSPO.	Spanish	This paragraph is correct; however, from the moment that the grower concerned pays the CB for its services there is already a potential bias or conflict of interest. The grower should pay into an RSPO fund and then later the CB, once the service has been carried out at the desired level of quality. Of course, the grower requests the service from the CB but deposits the payment with the RSPO.	Solidaridad	Noted.

Box 3: 'Conflict of Interest'	Requirements, process, parameters or criteria	Where Certification Body (CB) assessors carry out the assessments under the NPP, the CB must demonstrate that there is no conflict of interest with their client for RSPO HCV certification in keeping with the RSPO certification system requirements; i.e. the SEIA or HCV assessors that developed the implementation plans for NPP cannot conduct verification of the same assessments and plans.	English	N/A	Malaysia workshop	Agreed
Box 3: 'Conflict of Interest'	Smallholders	Akan ada biaya 2, yakni untuk NPP dan untuk audit. Lalu bagaimana dengan swadaya?	Bahasa	Two costs will incur: for NPP and audit. What about (cost) independent smallholders?	Setara Jambi	noted
Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Add more specific detail or explanation	"official notification to proceed by the RSPO": consider guidance on when this will issued-time frame and whether copied to CB?	English	N/A	Malaysia workshop	this will be issued by 1st working day after 30 day period (if no outstanding issues) and copied to CB

Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Add more specific detail or explanation	“The member remains responsible despite the CB being tasked to submit the NPP report”: consider giving guidance on responsible for what action?	English	N/A	Malaysia workshop	Grower is still responsible for overall NPP process
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Add more specific detail or explanation	The grower should also post notification on local notice boards, including offices and at central locations in each of the affected communities, for a period of 30 days: any comments received through this process must be sent to the RSPO Secretariat in English. The grower is also encouraged to inform interested stakeholders (ones consulted during the assessments) in a timely manner when the NPP is up for comment.	English	N/A	HCVRN	Noted and incorporated

Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Add more specific detail or explanation	<p>The member remains responsible despite the CB being tasked to submit the NPP report.</p> <p>It is not clear what the member ‘remains responsible for’ – is it for the timely submission of the documents or is it for not proceeding with land clearing until a reply is received?</p>	English	N/A	WWF	Grower is still responsible for overall NPP process
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Add more specific detail or explanation	The text, we recommend, would benefit from including a comment that publication and active stakeholder engagement in this stage can helpfully trigger “early warnings” and may prevent cumbersome conflicts later. “Comments received after 30 days” in that sense are bad news.	English	N/A	Oxfam	Noted and incorporated
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Add something	For RSPO to consider the acceptance of comments in different (local) languages, propose for the RSPO Secretariat to engage qualified/professional translator to translate the comments.	English	N/A	Malaysia workshop	Noted and incorporated

Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Add something	There is no explicit sanction for producers that begin planting without receiving notification of acceptance of the NPP.	English	N/A	NES Naturaleza	Noted. RSPO is working to address the issue of sanctions
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Internal consistency	“The RSPO will post the notification of the new planting on the RSPO website”: this sentence should be considered to be removed because the following sentence require 10 working days for RSPO to check.	English	N/A	Malaysia workshop	Noted and incorporated

Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Requirements, process, parameters or criteria	<p>El productor DEBERA también enviar notas de oficio o carta a las comunidades, publicar la notificación en anuncios locales, en los espacios visibles de las oficinas y lugares centrales de cada una de las comunidades afectadas, por un período de 30 días señalando la dirección de la RSPO a donde deben enviar sus comentarios EN ESPAÑOL O IDIOMA LOCAL y aclarando que solo tienen el tiempo de 30 días para hacerlo.</p> <p>Nota: Estos comentarios no deben ser recibidos por el Productor porque se presta a la manipulación y desconfianza.</p>	Spanish	<p>The grower MUST also send official notes or letters to the communities, post notification on local notice boards and in visible areas of the offices and central locations in each of the affected communities, for a period of 30 days, indicating the address of the RSPO to which they should send their comments IN SPANISH OR THE LOCAL LANGUAGE and confirming that they have only 30 days to do so.</p> <p>Note: These comments should not be received by the grower because this can lead to manipulation and a loss of trust.</p>	Solidaridad	Noted and incorporated
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Requirements, process, parameters or criteria	¿Qué tiempo máximo se considera para cumplir todo el proceso? ¿Cómo se garantiza la viabilidad económica? A los productores les implica incurrir en costos pre operativos mientras esperan la aprobación.	Spanish	What is considered to be the maximum time frame for completion of the whole procedure? How can its economic viability be ensured? This will involve pre-operative costs for growers while they await approval.	Colombia workshop	Maximum time frame depends on comments received. We can only provide indicative timeframes for the process itself barring any stumbling blocks

Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Requirements, process, parameters or criteria	¿Se debe ser miembro de la RSPO antes de iniciar el proceso?	Spanish	Is it necessary to be a member of the RSPO before starting the procedure?	Colombia workshop	It is not necessary to be an RSPO member to subscribe to the NPP. Non-members are welcome to also use the NPP as a guide for responsible new planting development. However, all RSPO members must comply with the NPP when undertaking new developments
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Requirements, process, parameters or criteria	Apabila tahap NPP telah diverifikasi oleh CB dan dokumen NPP telah diserahkan kepada RSPO, maka yang bertanggung jawab terhadap laporan tersebut adalah CB bukan grower.	Bahasa	Once NPP steps are verified by CB and NPP document is already submitted to RSPO, the party responsible for the report will be the CB and not the grower.	Indonesia workshop	Both are responsible for the report although it is the CB that submits
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Requirements, process, parameters or criteria	Comment être rassuré que les commentaires issus de la notification publique locale sont fidèlement transmis au RSPO par l'exploitant ?	French	What assurances do we have that the comments from the local public notification are accurately forwarded to RSPO by the producer?	Gabon workshop	Noted. All comments will be submitted directly to RSPO

Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Requirements, process, parameters or criteria	Como debe ser una publicación a RSPO, cuando el proyecto es menor de 500 Hectáreas y el informe se realiza por alguien interno. Este informe interno deberá usar los formatos para hacer un Informe Publico. Se debería indicar cuales son los pasos a seguir. O ese informe interno , solo se le muestra a los auditores al momento de una certificación o a termino de un seguimiento . Este informe debe ser en inglés para enviarlo a RSPO???	Spanish	As it should be an RSPO publication, when the project is less than 500 hectares and the report is drawn up by an insider. This internal report should follow the formats for a public report. It should indicate what steps are to be taken. This internal report should only be shown to the auditors at the time of certification or upon conclusion of monitoring. Should this report be in English for transmission to the RSPO ???	Jaremar	Internal assessments does not mean no public reporting. It just means that the company can choose to do the assessments internally rather than engaging independent external experts/consultants. Format of reporting and the public notification requirement in Annex 1
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Requirements, process, parameters or criteria	Company should be allowed to choose whether they want to submit or let the CB to submit the NPP document to RSPO. There must be a choice for submission rather than fixed it for CB.	English	N/A	Musim Mas	Not accepted. Only CB to submit

Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Requirements, process, parameters or criteria	For RSPO to consider the acceptance of comments in different (local) languages, propose for the RSPO Secretariat to engage qualified/profesional translator to translate the comments.	English	N/A	Genting Plantations	Noted.
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Requirements, process, parameters or criteria	If grower has followed 30 day public consultation successfully without any comment, then in the future, if there is complaint related to the steps of NPP (including HCV Assessment, SEIA, CB Verification), then RSPO shall reject that complaint.	English	N/A	First Resources	Refer to Step 7. "Comments received by the Secretariat after the notification period will be addressed as a complaint under the RSPO Complaints System."

<p>Step 6: Submission of NPP report to the RSPO Secretariat & Public notification</p>	<p>Requirements, process, parameters or criteria</p>	<p>Procedure It is not completely clear what the steps are after all assessments have been carried out. The currently described steps are: (1) The CB checks formalities and does field checks regarding the assessment reports (2) The findings from the CB are documented and properly reported to the grower which will then ensure that all requirements under the NPP are complied with (3) CB shall submit the final NPP report within 5 working days on behalf of the member (4) The RSPO will post the notification of the new planting on the RSPO website for public consultation (5) comments received by the RSPO Secretariat will be fed back to the grower (6) On satisfactory completion of any comments and/or complaint, the RSPO Secretariat will formally notify the company electronically on the 1st working day after the 30 days notification period ends, or once any issues raised are resolved.</p>	<p>English</p>	<p>N/A</p>	<p>Wetlands International</p>	<p>Noted. RSPO will tighten up verification with the CB guidance and focusing on NPP training for CBs once document endorsed</p>
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		<p>(7) Completion of the NPP process will be posted on the RSPO website</p> <p>It seems that RSPO hands over the responsibility of sustainable development to 'others', 'the public'. IF there are no complaints or comments from people that where voluntary reviewing the submitted NPP (will there be anyone that voluntary reviews the NPP submissions?), who will check that e.g. the (1) decisions on go and no-go areas area justifiable (2) management and mitigation plans are appropriate etc etc. The CB as described above only does the check for formalities and procedures and checks if the assessments are performed in a appropriate way.</p>				
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Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Requirements, process, parameters or criteria	RSPO should apply sanctions to CBs that submit reports late if it can be proven that the companies have fulfilled all obligations	English	N/A	Ghana workshop	Not accepted
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Requirements, process, parameters or criteria	Submission of NPP report shall be maintained as current practice i.e. growers to submit the report to RSPO, and to keep CB in the loop.	English	N/A	Malaysia workshop	Not accepted
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Requirements, process, parameters or criteria	The issue of the grower being held responsible if the CB delays in submitting the final NPP report to RSPO should be reconsidered (i.e. the grower should not be held responsible for this).	English	N/A	Ghana workshop	Both are responsible for the report although it is the CB that submits.
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Requirements, process, parameters or criteria	The quality checks by the CB need to include except for 'procedural control' also 'content control' (e.g. has the decisions on go or no-go for new developments be justified and does the justification make sense, do emission reduction plans make sense etc)	English	N/A	Wetlands International	noted. Addressed in guidance for CB verification

Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Requirements, process, parameters or criteria	What happens to the NPP process/Company should the 5 days timeline is not fulfilled by the Certification Body. Suggest to put at least 14 working days for practicability. Further extension of time should be allowed with justification.	English	N/A	Malaysia workshop	Not accepted
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Scope and focus	¿Cuál debe ser el alcance de la notificación por parte del productor?	Spanish	What is the scope of the notification by the grower?	Colombia workshop	Unclear comment. Template already provided
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Syntax, definitions and terminology	A nivel general todo el procedimiento debe contener claramente definido los términos por cada actividad, en especial aquellas donde se interactúen externos (RSPO, Entes certificadores).	Spanish	In general, the procedure must contain clearly defined terms for each activity, especially those which involve external interaction (RSPO, certification bodies).	Colombia workshop	Noted and incorporated
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Syntax, definitions and terminology	Como documento normativo hay que diferenciar lo mandatorio de lo opcional, distinguiendo el uso de debería Vs. debe.	Spanish	As this is a policy document, it should distinguish between what is mandatory and what is optional, distinguishing between the use of “should” and “must” (in Spanish: debería Vs. debe).	Colombia workshop	NPP is not a policy document but a procedure.

Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Syntax, definitions and terminology	Revoir à nouveau les termes « devrait » et « devra ».	French	Review again the use of the words “should” and “shall”.	Gabon workshop	Noted
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Syntax, definitions and terminology	What is local notice board?	English	N/A	Malaysia workshop	Already explained in document
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Technical clarification (size area, peat)	Note that in peat areas greater than 100 ha no new development is allowed. For areas less than 100 ha, developments on peat shall be avoided, meaning that they shall be considered as no-go. This could be better emphasized in the text of the NPP.	English	N/A	Wetlands International	
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Technical clarification (timeframe)	“Within 5 working days”: consider specify whether 5 working days start from the day sign off the verification statement.	English	N/A	Malaysia workshop	This is clarified

Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Technical clarification (timeframe)	30 days is not sufficient for concerned parties to provide feedback and monitor the RSPO website for NPP. Aside from that fact, the rest of RSPO feedback time seems to be 60 days (following ISEAL?), so why should this be 30 days. NGOs and concern parties should be given ample time to alert RSPO on NPP issues. 60 days is adequate and fair	English	N/A	Hutan	Not accepted
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Technical clarification (timeframe)	CB shall submit the final NPP report within 2 working days instead of 5 working days on behalf of the member.	English	N/A	Musim Mas	Not accepted
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Technical clarification (timeframe)	Checking by RSPO shall take 5 days (instead of 10 days).	English	N/A	Malaysia workshop	Not accepted

<p>Step 6: Submission of NPP report to the RSPO Secretariat & Public notification</p>	<p>Technical clarification (timeframe)</p>	<p>Current wording (paragraph 3): “All comments received by the RSPO Secretariat will be fed back to the grower within 3 working days of receipt for their information and for clarifications if necessary, including the CB in the communication. Any comments received after the 30 days public notification will be forwarded to the grower and addressed outside of the NPP process”</p> <p>Comment: The RSPO must make it clear in the notification that the time period is strictly 30 days. Comments received after the 30 days period will not be entertained. If the RSPO can do this on submission of ACOP which cut off on 6th July, 2015 (there by no more inputs are possible after 6th July, 2015), the same can be done for NPP public comment. This is very crucial as the growers' field operations have to proceed after the notification period where no comments have been received.</p>	<p>English</p>	<p>N/A</p>	<p>Musim Mas</p>	<p>Not accepted</p>
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		Proposed wording: “All comments received by the RSPO Secretariat will be fed back to the grower within 3 working days for their information and for clarifications if necessary. Any comments received after the 30 days public notification will be recorded by the RSPO Secretariat, and forwarded to the grower for their information only”				
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Technical clarification (timeframe)	El término de 30 días del sitio web de la RSPO debería ser revisado, pues es bastante tiempo. Si los tiempos son muy largos puede interferir en la planeación de la empresa. Se pide a la RSPO que fije tiempos de respuesta también. Se podría reducir el tiempo de publicación a 15 días.	Spanish	After 30 days the RSPO website should be revised, as it is high time for this. If the time frames are too long this can interfere with the company’s planning processes. The RSPO is requested also to stipulate the response times. This could reduce the publication delay to 15 days.	Colombia workshop	unclear comment

Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Technical clarification (timeframe)	It is recommended that the time for submitting the final NPP report to the RSPO secretariat should be clearly stated in the contract between the CB and the grower and a copy sent to the RSPO secretariat. This would make the CB solely responsible for any delays in submitting the report.	English	N/A	Ghana workshop	this is a contractual arrangement between the CB and the company. RSPO is not involved
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Technical clarification (timeframe)	RSPO should be given 5 working days instead of 10 working days upon receipt to check whether the submission is complete.	English	N/A	Musim Mas	RSPO maintains the 10 working days
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Technical clarification (timeframe)	To clarify if the comments is received on the 30th day of the public notification, this should also be addressed within the NPP process.	English	N/A	Genting Plantations	Yes, it will be addressed under the NPP comments mechanism

Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Technical clarification (timeframe)	To clarify if the comments is received on the 30th day of the public notification, this should also be addressed within the NPP process.	English	N/A	Malaysia workshop	Yes, it will be addressed under the NPP comments mechanism
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Technical clarification (timeframe)	What happens to the NPP process/Company should the 5 days timeline is not fulfilled by the Certification Body. Suggest to put at least 14 working days for practicability. Further extension of time should be allowed with justification.	English	N/A	Genting Plantations	Once the CB has verified everything, it means the work is complete, there should be nothing stopping the CB from making the submission to RSPO within 5 working days. The 5 working days should not be confused with the working days required for the verification itself
Step 6: Submission of NPP report to the RSPO Secretariat & Public notification	Technical detail	Agar disebutkan dan ditegaskan langkah yang ditempuh jika terdapat pembukaan lahan/infrastruktur (pembibitan, akses jalan, dll) sebelum NPP dilakukan ataupun Notifikasi resmi 30 hari ? (namun bukan di primary foresta tau HCV) Sebaiknya diperbolehkan.	Bahasa	Please include steps to take where land has been cleared or infrastructures have been developed (for nursery, road access, etc.) prior to NPP or 30 days of official notification, and confirm the steps. (save for primary forest or HCV	Indonesia workshop	Not accepted

Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
				area). It should be allowed.		
Box 4: 'Practical considerations for the Public Notification'	Add more specific detail or explanation	"local on-site notice boards": which are considered as local on-site?	English	N/A	Malaysia workshop	Local notice board; community hall, district office, website, mills (if applicable), local media (newspapers), etc.
Box 4: 'Practical considerations for the Public Notification'	Requirements, process, parameters or criteria	For local level notices, this requirement should be stressed as a must	English	N/A	Malaysia workshop	Noted
Box 4: 'Practical considerations for the Public Notification'	Requirements, process, parameters or criteria	For local level notices, this requirement should be stressed as a must.	English	N/A	Genting Plantations	Noted
Box 4: 'Practical considerations for the Public Notification'	Requirements, process, parameters or criteria	Pemberitahuan publik cukup melalui postingan di website RSPO tidak perlu ada penempelan informasi dilokasi.	Bahasa	Public notification through RSPO website would suffice. There is no need to display information in the field.	Indonesia workshop	Not accepted

Box 4: 'Practical considerations for the Public Notification'	Requirements, process, parameters or criteria	Untuk ditambahkan, Jika dalam waktu lebih dari 30 RSPO belum memberikan informasi/notifikasi NPP maka NPP secara otomatis disetujui oleh RSPO. Karena pernah terjadi lebih dari 30 hari kerja belum ada notifikasi/pemberitahuan.	Bahasa	For addition: if RSPO, in more than 30 days, is yet to provide information or notify on NPP, the NPP shall automatically be approved by RSPO. A case once took place where no notification/information was passed in 30 business days.	Indonesia workshop	RSPO will notify by 1st working day after the 30 days. Companies need to wait for this formal notification
Box 4: 'Practical considerations for the Public Notification'	Requirements, process, parameters or criteria; Translation	It could also be published in local newspaper of the area both in English papers (if available) and appropriate national language. Newspapers in Malaysia are widely read and concerned parties might not see notices in the area nor would they be regularly checking RSPO websites. By publishing in local papers in English (if available) and the appropriate local language it provides better changes of concerned parties being aware before the NPP happens rather than later when it starts and issues crops up. This would in actuality assist the companies in the long run	English	N/A	Hutan	Not accepted

Box 4: 'Practical considerations for the Public Notification'	Syntax, definitions and terminology	'Notification of locations..?' To clarify what is meant.	English	N/A	Malaysia workshop	comment not understood
Box 4: 'Practical considerations for the Public Notification'	Translation	En relación al reporte del OC que se colocará en el website de la RSPO, para el caso de América Latina, dicho reporte debe estar en ESPAÑOL por respeto a la cultura de la población local y facilitar el entendimiento del proceso y eficiente desarrollo.	Spanish	Regarding the CB report to be posted on the RSPO website, for Latin America this report must be in SPANISH, out of respect for the culture of the local population and to facilitate understanding of the process and its efficient implementation.	Solidaridad	the report to RSPO must be in English. Submission in national language is also encouraged. RSPO can upload the english and national language versions. However, in case of discrepancy, the english version is leading.

Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Step 7: Resolution & completion	Add more specific detail or explanation	Par 2. Need to create a Code of Conduct	English	N/A	Indonesia workshop	Comments requiring a code of conduct for commenters is rejected. However, to address the concerns raised, RSPO has included a statement of responsibility and good faith and comments need to be substantiated with supporting documents and evidence
Step 7: Resolution & completion	Add more specific detail or explanation	The text, we recommend, would benefit from including a comment that publication and active stakeholder engagement in this stage can helpfully trigger “early warnings” and may prevent cumbersome conflicts later. “comments/issue will be dismissed” in that sense is bad news.	English	N/A	Oxfam	Noted and incorporated

Step 7: Resolution & completion	Requirements, process, parameters or criteria	Single individuals or small, non-representative special interest groups now will have the ability to block part 1`or all development indefinitely and growers will have no recourse to a resolution process given the proposed methodology. Amicable corrective actions are a desirable outcome but may not be possible in circumstances. Step 7 does not allow for a balanced mechanism for resolution.	English	N/A	Inti Indosawit Subur	already addressed. See This has been addressed. A clearer procedure for the resolution of a comment has been outlined with timelines.
Step 7: Resolution & completion	Requirements, process, parameters or criteria	“The party raising a comment or an issue has the final say on whether and when the issue raised can be considered resolved.” If the comment has been adequately replied or addressed by the Company, the issue should be considered resolved by the RSPO, and not by the party, who could refuse to resolve it without adequate reasons/grounds.	English	N/A	First Resources	If it cannot be resolved bilaterally within the stipulated timeframe, it may be escalated to the Complaints Panel

Step 7: Resolution & completion	Requirements, process, parameters or criteria	Antes de la impugnación debe haber un proceso verificado con argumentos que garanticen el interés de la parte que plantea el comentario. Garantizar legitimidad del debido proceso en la impugnación	Spanish	Before a complaint is lodged a verified and duly argued process must take place, to safeguard the interest of the party that raised the comments, thereby ensuring that due process is followed in dealing with complaints.	Colombia workshop	Comments requiring a code of conduct for commenters is rejected. However, to address the concerns raised, RSPO has included a statement of responsibility and good faith and comments need to be substantiated with supporting documents and evidence
Step 7: Resolution & completion	Requirements, process, parameters or criteria	Any party submitting their comments have to sign a standard code of conduct declaring their clear understanding of the NPP process, commitment and respect the process and they have to bare the consequences and the cost if the complaints is false to be or untrue.	English	N/A	Inti Indosawit Subur	Comments requiring a code of conduct for commenters is rejected. However, to address the concerns raised, RSPO has included a statement of responsibility and good faith and comments need to be substantiated with supporting documents and evidence

Step 7: Resolution & completion	Requirements, process, parameters or criteria	Any party submitting their comments have to sign a standard code of conduct declaring their clear understanding of the NPP process, commitment and respect the process and they have to bare the consequences and the cost if the complaints is false to be or untrue.	English	N/A	Indonesia workshop	Comments requiring a code of conduct for commenters is rejected. However, to address the concerns raised, RSPO has included a statement of responsibility and good faith and comments need to be substantiated with supporting documents and evidence
Step 7: Resolution & completion	Requirements, process, parameters or criteria	Company who proved to have uncontested ownership and management of existing agricultura land, are not required to go through NPP for land conversión or new planting.	English	N/A	Inti Indosawit Subur	Not accepted
Step 7: Resolution & completion	Requirements, process, parameters or criteria	Company who proved to have uncontested ownership and management of existing agricultura land, are not required to go through NPP for land conversión or new planting.	English	N/A	Indonesia workshop	Not accepted

Step 7: Resolution & completion	Requirements, process, parameters or criteria	<p>Current wording (paragraph 3): “Land preparations shall only take place once all comments or disputes have been addressed and parties involved agreed to amicable corrective actions”</p> <p>Comment: It must be acknowledged that it is not always possible for complaints to be resolved immediately, let alone to agree to amicable corrective actions. As long as the process of resolution has commenced, the growers should be allowed to proceed with completion of the NPP process.</p>	English	N/A	Musim Mas	Noted and incorporated
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Step 7: Resolution & completion	Requirements, process, parameters or criteria	<p>Current wording on the resolution process for NPP process (paragraph 4): “The RSPO secretariat cannot issue notification of completion of the NPP while comments or disputes received during the public notification period are still under consideration”</p> <p>Propose wording: “The RSPO secretariat cannot issue notification of completion of the NPP while comments or disputes received during the public notification period are still under consideration unless there is evidence that the resolution process has commenced”</p>	English	N/A	Musim Mas	Noted and incorporated
Step 7: Resolution & completion	Requirements, process, parameters or criteria	During the process and shall not initiate negative viral social campaign or articles while all parties concern are still in the process.	English	N/A	Inti Indosawit Subur	The Secretariat does not have control over this. However, if parties concerned are RSPO members, they are bound by the Code of Conduct for members

Step 7: Resolution & completion	Requirements, process, parameters or criteria	During the process and shall not initiate negative viral social campaign or articles while all parties concern are still in the process.	English	N/A	Indonesia workshop	The Secretariat does not have control over this. However, if parties concerned are RSPO members, they are bound by the Code of Conduct for members
Step 7: Resolution & completion	Requirements, process, parameters or criteria	During the resolution process and shall not initiate negative viral social campaign or articles while all parties concern are still in the process.	English	N/A	GAR	The Secretariat does not have control over this. However, if parties concerned are RSPO members, they are bound by the Code of Conduct for members
Step 7: Resolution & completion	Requirements, process, parameters or criteria	If the party raising a comment or an issue has the final say, there are concerns where an issue cannot be resolved over an extended period of time.	English	N/A	Malaysia workshop	This has been addressed. A clearer procedure for the resolution of a comment has been outlined with timelines.

Step 7: Resolution & completion	Requirements, process, parameters or criteria	In Para 2, A Code of Conduct for the party raising the comments/issues must be develop to ensure a genuine case. Any party submitting their comments have to sign a standard code of conduct declaring their clear understanding of the NPP process, commitment and respect the process and they have to bear the consequences and the cost if the complaints is false / to be untrue.	English	N/A	GAR	Comments requiring a code of conduct for commenters is rejected. However, to address the concerns raised, RSPO has included a statement of responsibility and good faith and comments need to be substantiated with supporting documents and evidence
Step 7: Resolution & completion	Requirements, process, parameters or criteria	It is strongly recommended that an independent third party should arbitrate between the grower and the complainant and should have the power to determine when a complaint has been adequately addressed	English	N/A	Ghana workshop	Not incorporated.If parties are agreeable to mediation, it can be forwarded to DSF (Dispute Settlement Facility).

Step 7: Resolution & completion	Requirements, process, parameters or criteria	Jika dalam masa 30 hari ada komplain dari stakeholder yang disampaikan kepada RSPO, maka komplain tersebut harus disertai dengan buktinya, kemudian terlebih dahulu diverifikasi RSPO (melalui grievance panel committee) kebenarannya baru, jika valid barulah kemudian diinformasikan kepada grower untuk dapat diselesaikan.	Bahasa	If, within the 30 days, complaint arises from stakeholders and is filed to RSPO, the complaint shall be accompanied by its evidences and verified first by RSPO (by means of the grievance panel committee). If it is proven to be valid, grower shall be informed to resolve it.	Indonesia workshop	already addressed. See relevant response above
Step 7: Resolution & completion	Requirements, process, parameters or criteria	La RSPO doit pouvoir envoyer un document formel au producteur certifiant l'achèvement du PNP.	French	The RSPO must be able to send a formal document to the producer attesting the completion of the NPP.	Gabon workshop	Noted and incorporated
Step 7: Resolution & completion	Requirements, process, parameters or criteria	Le dernier mot étant concédé à la partie plaignante, le conflit peut être repoussé indéfiniment dans le temps (en cas de mauvaises intentions). En cas de non résolution répétée des conflits, la RSPO doit pouvoir proposer un arbitrage.	French	The final say is granted to the complainant, so the conflict may be postponed indefinitely (in case of bad intentions). In case of repeated non-resolution of the conflict, the RSPO must be able to offer arbitration.	Gabon workshop	already addressed. See relevant response above
Step 7: Resolution & completion	Requirements, process, parameters or criteria	Les litiges peuvent donc être réglés à l'amiable ou suite à un arbitrage de la RSPO.	French	Disputes can be settled amicably or following an arbitration of the RSPO	Gabon workshop	already addressed. See relevant response above

Step 7: Resolution & completion	Requirements, process, parameters or criteria	P 24, annex 2, party who submit comments shall fax an evidence in RSPO define template.	English	N/A	Inti Indosawit Subur	we will only maintain 2 platforms of communication - email and direct upload onto our website (the existing online comments box)
Step 7: Resolution & completion	Requirements, process, parameters or criteria	P 24, annex 2, party who submit comments shall fax an evidence in RSPO define template.	English	N/A	Indonesia workshop	Comments and supporting documents shall be sent via email or uploaded directly via the online comments page.
Step 7: Resolution & completion	Requirements, process, parameters or criteria	Par 2. Need to create a Code of Conduct	English	N/A	Inti Indosawit Subur	No. There should not be a Code of Conduct just to submit comments
Step 7: Resolution & completion	Requirements, process, parameters or criteria	Party raising comment shall not have the final say on wheter the issue raised consider resolved. The RSPO should decide resolution of case based on preset conditions and criteria for closure of case.	English	N/A	Inti Indosawit Subur	already addressed. See relevant response above
Step 7: Resolution & completion	Requirements, process, parameters or criteria	Party raising comment shall not have the final say on wheter the issue raised consider resolved. The RSPO should decide resolution of case based on	English	N/A	Indonesia workshop	already addressed. See relevant response above

		preset conditions and criteria for closure of case.				
Step 7: Resolution & completion	Requirements, process, parameters or criteria	Party raising comment/issue must not have the final say on whether the issue raised is considered resolved. The RSPO should be the deciding body on resolution of case based on pre-set conditions and criteria for closure of case.	English	N/A	GAR	already addressed. See relevant response above
Step 7: Resolution & completion	Requirements, process, parameters or criteria	pertanyaan yang diterima selama pemberitahuan publik dijawab oleh grower dan tidak perlu konfirmasi kepada pengaju komplain apakah jawaban memuaskan atau tidak. Jawaban grower bukan sarana pemuas bagi penanya.	Bahasa	Question received during public notification should be answered by grower and there is no need to confirm to complainant on whether the answer is satisfactory because the grower's answer does not necessarily mean to satisfy the complainant.	Indonesia workshop	already addressed. See relevant response above

Step 7: Resolution & completion	Requirements, process, parameters or criteria	Regarding, “The party raising a comment or an issue has the final say on whether and when the issue raised can be considered resolved.”, is this the normal approach in cases of dispute resolution? What is an objector refuses to resolve an issue?	English	N/A	Credit Suisse	already addressed. See relevant response above
Step 7: Resolution & completion	Requirements, process, parameters or criteria	RSPO must play a proactive role in facilitating comments such as in Annex 2 on NPP Comments Mechanism, party who submit comments shall do so in the RSPO defined template with supporting evidence.	English	N/A	GAR	already addressed. See relevant response above
Step 7: Resolution & completion	Requirements, process, parameters or criteria	RSPO playing active role in facilitating comments process instead of doing post man job.	English	N/A	Inti Indosawit Subur	already addressed. See relevant response above
Step 7: Resolution & completion	Requirements, process, parameters or criteria	RSPO playing active role in facilitating comments process instead of doing post man job.	English	N/A	Indonesia workshop	already addressed. See relevant response above

Step 7: Resolution & completion	Requirements, process, parameters or criteria	RSPO Secretariat should take the role to verify and review the comments, and whether the comments/complaints are valid/relevant or not, to avoid unrealistic expectations from complainants. The background and contact details of the complainant should be verified, and comments should be supported by valid data/information, strictly no anonymous complaints allowed. Complainant should be limited to the country of operations, as there are many aspects of the operations that is only known to the local stakeholders.	English	N/A	Malaysia workshop	already addressed. See relevant response above
Step 7: Resolution & completion	Requirements, process, parameters or criteria	Single individuals or small, non-representative special interest groups will now will have the ability to block part 1`or all development indefinitely and growers will have no recourse to a resolution process given the proposed methodology. Amicable corrective actions are a desirable outcome but may not be possible in circumstances. Step 7 does not allow for a balanced mechanism for resolution.	English	N/A	Indonesia workshop	already addressed. See relevant response above

<p>Step 7: Resolution & completion</p>	<p>Requirements, process, parameters or criteria</p>	<p>Strongly disagree with the clause 'The party raising a comment or an issue has the final say on whether and when the issue raised can be considered resolved.' Propose that RSPO Secretariat/Technical team to mediate the process and to have the final say for any pending issues, to resolve the issue.</p> <p>RSPO Secretariat should take the active role to verify and review the comments, and whether the comments/complaints are valid/relevant or not, to avoid unrealistic expectations from complainants. The background and contact details of the complainant should be verified, and comments should be supported by valid data/information, strictly no anonymous complaints allowed. Complainant should be limited to the country of operations, as there are many aspects of the operations that is only known to the local stakeholders.</p> <p>If the party raising a comment</p>	<p>English</p>	<p>N/A</p>	<p>Genting Plantations</p>	<p>Commentors will be asked to provide supporting documents and evidence to substantiate their claims.</p>
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		or an issue has the final say, there are concerns where an issue cannot be resolved over an extended period of time.				
Step 7: Resolution & completion	Requirements, process, parameters or criteria	Strongly disagree with the clause 'The party raising a comment or an issue has the final say on whether and when the issue raised can be considered resolved.' Propose that RSPO Secretariat/Technical team to mediate the process and to have the final say for any pending issues, to resolve the issue.	English	N/A	Malaysia workshop	Preferably this should be done bilaterally. If no resolution, then refer to complaints panel or DSF if mediation is requested. Please see relevant response above
Step 7: Resolution & completion	Requirements, process, parameters or criteria	Suggest adding the text in red: On satisfactory completion of the 30 day notification period and on no comments or complaints being received and/or resolution of any comments and/or complaint, the RSPO Secretariat will formally notify the company electronically on the 1st working day after the 30 days notification period ends, or once any issues raised are resolved.	English	N/A	WWF	we accept the edit but will only use the term comment rather than complaint in order to be consistent with the terminology used by the complaints team

Step 7: Resolution & completion	Requirements, process, parameters or criteria	The complainant having the final say on when and whether a complaint is finally resolved should be reconsidered. This is because a complainant who is vehemently opposed to the oil palm development for no clearly justifiable reason may still insist that his complaints have not been resolved satisfactorily even if the CB determines otherwise	English	N/A	Ghana workshop	Preferably this should be done bilaterally. If no resolution, then refer to complaints panel or DSF if mediation is requested. Please see relevant response above
Step 7: Resolution & completion	Requirements, process, parameters or criteria	The gravity/importance of complaints/comments should be assessed; not all comments have to be taken into consideration because some could be purely flimsy/frivolous and could delay the process unduly. Comments should first be investigated and their veracity/relevance/importance assessed before notifying the grower to address them	English	N/A	Ghana workshop	Commentors will be asked to provide supporting documents and evidence to substantiate their claims.

Step 7: Resolution & completion	Requirements, process, parameters or criteria	<p>The party raising a comment or an issue has the final say on whether and when the issue raised can be considered resolved.</p> <p>Is this workable and does it follow RSPO precedent? This could open the door to vexatious complaints that that the party raising has no intention of closing. At some point the RSPO needs to judge whether a ‘complaint’ has merit or can reasonably be ‘closed’.</p>	English	N/A	WWF	Preferably this should be done bilaterally. If no resolution, then refer to complaints panel. Please see relevant response above
Step 7: Resolution & completion	Requirements, process, parameters or criteria	The party raising a comment or an issue has the final say on whether and when the issue raised can be considered resolved. If the company’s reply to a comment/issue isn’t acknowledged within 20 days by the party concerned, the comment/issue will be closed. dismissed for the purpose of NPP closure.	English	N/A	Malaysia workshop	Noted and incorporated

Step 7: Resolution & completion	Requirements, process, parameters or criteria	The party raising a comment/issue shall not have the final say as it may be subject to abuse by ill-intended parties. The final say should be from an independent, un-biased third party.	English	N/A	Malaysia workshop	Preferably this should be done bilaterally. If no resolution, then refer to complaints panel. Please see relevant response above
Step 7: Resolution & completion	Requirements, process, parameters or criteria	The party who gave false accusation will be blacklisted and publish on the website and cannot follow further process.	English	N/A	GAR	Reject. However, now commenters are required to provide supporting documents/materials as evidence to their comments or claim.
Step 7: Resolution & completion	Requirements, process, parameters or criteria	The party who gave false accusation will be blacklisted and publish on the website and cannot follow further process.	English	N/A	Inti Indosawit Subur	Not accepted. However, now commenters are required to provide supporting documents/materials as evidence to their comments or claim.
Step 7: Resolution & completion	Requirements, process, parameters or criteria	The party who gave false accusation will be blacklisted and publish on the website and cannot follow further process.	English	N/A	Indonesia workshop	Not accepted. However, now commenters are required to provide supporting documents/materials as evidence to their comments or claim.

Step 7: Resolution & completion	Requirements, process, parameters or criteria	What would be the decision when part of the proposed Project area has unresolved issues when all other parts comply with the NPP? Would growers be given the go-ahead to develop the other areas which are compliant?	English	N/A	Ghana workshop	Yes. This is already addressed in the current text. Undisputed areas can go ahead
Step 7: Resolution & completion	Scope and focus	Single individuals or small, non-representative special interest groups now will have the ability to block part 1`or all development indefinitely and growers will have no recourse to a resolution process given the proposed methodology. Amicable corrective actions are a desirable outcome but may not be possible in circumstances. Step 7 does not allow for a balanced mechanism for resolution.	English	N/A	GAR	already addressed. See relevant response above
Step 7: Resolution & completion	Smallholders	Again, some reference to smallholders needed.	English	N/A	Malaysia workshop	Noted. Please refer to related responses on smallholders

Step 7: Resolution & completion	Technical clarification (timeframe)	<p>Current wording (paragraph 2): “The party raising a comment or an issue has the final say on whether and when the issue raised can be considered resolved. If the company’s reply to a comment/issue isn’t acknowledged within 20 days by the party concerned, the comment/issue will be dismissed for the purpose of NPP closure”</p> <p>Comment: The timeline for acknowledging a reply is too long. It is not always possible for complaints to be resolved immediately. Complaint and comment need to be differentiated. As long as the process of resolution has commenced, the growers should be allowed to proceed with completion of the NPP process.</p> <p>Propose to omit the wording.</p>	English	N/A	Musim Mas	already addressed. See relevant response above
Step 7: Resolution & completion	Technical clarification (timeframe)	Debe de dárselos un plazo de 30 días y no 20 días a las partes interesadas en responder a los planteamientos realizados por la empresa o productor.	Spanish	The parties concerned must be given a period of 30 – not 20 – days to acknowledge comments	Solidaridad	Not accepted

				made by the company or grower.		
Step 7: Resolution & completion	Technical clarification (timeframe)	If the company's reply to a comment/issue isn't acknowledged within 20 days by the party concerned, the comment/issue will be dismissed for the purpose of NPP closure. Given that some complaints may come from community groups 20 days may be too short a period to expect a response. It should be extended to at least 30 days.	English	N/A	WWF	Not accepted
Step 7: Resolution & completion	Technical clarification (timeframe)	Notification period to increase to 60 days	English	N/A	Hutan	Not accepted
Subsection number	Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Supporting documents	Add more specific detail or explanation	Where are the references to these supporting documents?	English	N/A	First Resources	Annex 4
Supporting documents	Add something	Carbon stock assessment procedure and guidance. To be included in the list	English	N/A	Malaysia workshop	Noted
Supporting documents	Structure	To consider moving to end of document.	English	N/A	Malaysia workshop	Noted

List of Acronyms

General comments

Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Add more	Add a definition of secondary forest following accepted RSPO definition	English	N/A	Hutan	There is no RSPO definition of secondary forest
Add more	Additional EMP – Environmental Management Plan PMM – Proposal for Mitigation Measures ESA – Environmentally Sensitive Area DID – Department of Drainage & Irrigation HCS – High Carbon Stock LCS – Low Carbon Stock LUC – Land-used Change TPA – Totally Protected Areas	English	N/A	Malaysia workshop	EMP – Environmental Management Plan (No need to add because not found in this document) PMM – Proposal for Mitigation Measures (No need to add because not found in this document) ESA – Environmentally Sensitive Area (No need to add because not found in this document) DID – Department of Drainage & Irrigation (No need to add because of not found in this document) HCS – High Carbon Stock (Included already on page 6) LCS – Low Carbon Stock (No need to add because of not found in this document) LUC – Land-used Change (Included already on page 6) TPA – Totally Protected Areas (No need to add because of not found in this document)

Add more	ALS: Programa de Licencias para Asesores; usado para Altos Valores de Conservación	Spanish	ALS: Assessor licensing scheme; used for high conservation values	Grepalma	Included already and unnecessary to add more details
Add more	FPIC should be included	English	N/A	Thai stakeholders	Yes, FPIC included in the list
Add more	Propose to include:ESA – Environmentally Sensitive AreasLCS – Low Carbon Stock	English	N/A	Malaysia workshop	No need to add because of not found in this document
Add more	Seluruh istilah Acronym belum masuk dalam dokumen contoh : AMDAL	Bahasa	All accronyms are yet to be included in the document, e.g. AMDAL.	Indonesia workshop	Yes, AMDAL should be included because of this acronym quite specific name. Acronym explained.
Add more	The list of acronyms is not yet listed of all the acronyms found in the document. Example: AMDAL	English	N/A	Inti Indosawit Subur	Yes, the same about AMDAL
Add more	To be added to list of acronyms: FPIC.	English	N/A	Oxfam	Yes, FPIC included in the list
Confusion	Footnote note: Under MYNI (2014) indicator 7.3 – Guidance notes: The ‘NPP’ acronym may also refer to the Peninsular Malaysia’s National Physical Plan (NPP).	English	N/A	Malaysia workshop	This is standard procedure from RSPO talking about New Planting Procedure (NPP). Other Countries understand what it stands for in this document. I think if we read and found NPP in this document, it should be clear that this means NPP (New Planting Procedure).
Confusion	Under indicator 7.3 of the MYNI the use of NPP acronym are referred to National Physical Plan. Please change either one of this for better understanding	English	N/A	Malaysia workshop	The same as above about NPP in NIMY (indicator 7.3)
Positive overall	Semua daftar singkatan cukup jelas	Bahasa	All terms in the glossary are already clear.	Setara Jambi	Noted with thanks.

Translation	For the Indonesian version, there must be local specifics (eg. AMDAL, EIA) in the document	English	N/A	Sinar Mas	Yes, AMDAL should be added EIA should be added in this part
Translation	For the Indonesian version, there must be local specifics (eg. AMDAL, EIA) in the document.	English	N/A	GAR	Yes, AMDAL should be added EIA should be added in this part
Translation	In Bahasa version, better use the common English terminology to avoid confusion. For example: Page 6 English version & Page 7 Bahasa version. High Carbon Stock (HCS) vs Stok Karbon Tinggi (SKT). SKT in Bahasa can be mistaken with Surat Keterangan Tanah. Uin IBahasa version	English	N/A	Inti Indosawit Subur	Noted on possible confusion but we should be consistent. If translated P&C documents and NI documents uses the translated acronyms, then NPP should also be the same
Translation	Indonesian version: apabila sudah ada acronym dalam English maka tidak perlu diperbaiki.	Bahasa	Indonesian version: if acronym is already available in English there is no need for it to be replaced.	Indonesia workshop	Noted on possible confusion but we should be consistent. If translated P&C documents and NI documents uses the translated acronyms, then NPP should also be the same

Annex 1: Reporting templates and guidance

General comments

Category of comment	Comments received	Language	English translation	Source of comment	RSPO input
Template	All comments through the NPP Comments Mechanism should be guided by a standard templates. For the CB, RSPO and the Company to receive the comments simultaneously during this process. This is similar to the public notification process for RSPO Certification.	English	N/A	Malaysia workshop	Yes, this will be done

Greater guidance	This is a general comment about the NPP procedure and not necessary related to the document itself. To improve the quality of NPP reports submitted, suggest for RSPO to consider developing NPP verification guidelines for CBs, provide more training workshops and/or better yet, additional oversight by RSPO once the NPPs are submitted and before public notification. At the moment, NPP reports still contain inconsistencies (despite best efforts by RSPO to provide standardized assessment reporting templates), missing components and overlapping/repetitive sections (e.g. the same social findings can be found in SEIA and HCV summaries) as well as language and grammatical errors. Improving the quality of NPP reports will result in better levels of feedback and/or avoidance of complaints later.	English	N/A	Malaysia workshop	Action Point: RSPO Secretariat will be planning CB Workshop/Training for the NPP revised document.
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Comments on subsections of Annex 1

Subsection number	Comments received	Language	English translation	Source of comment	RSPO input
1.1 NPP Notification statement	5.1 says "There are 3 main components in the NPP report for Submission". Annex 1 has 5 reports.	English	N/A	Malaysia workshop	Agree with 5.1 (3 reports) and template for the summary report (Monitoring and Planning)
1.1 NPP Notification statement	There is no Summary of Management Plans Template in the Annex 1.	English	N/A	Malaysia workshop	done
1.1 NPP Notification statement	On 1.1.2: Page 20. In Bahasa Version Columns for " Nama Pekebun" in Indonesian draft suggested to be changed to "Name of Perusahaan"	English	N/A	Inti Indosawit Subur	Will check with the translator.
1.1 NPP Notification statement	On 1.1.2: Nombre del Productor/Grupo/Empresa	Spanish	On 1.1.2: Name of grower / group / company	Jaremar	Will change to "Name of Grower / Group"
1.1 NPP Notification statement	1.5 Structure of Summary Reports of Individual Assessments: HCV assessment: The ALS Template does not have the signing off section.	English	N/A	Malaysia workshop	Noted, this will be addressed.
1.1 NPP Notification statement	On 1.1.6: Statement of Acceptance of Responsibility for NPP Should also be signed by a Director of the company to ensure that even with staff changes at a management level the document still stands.	English	N/A	WWF	Not accepted

1.1 NPP Notification statement	On 1.1.7: This shall also include a statement that the company will implement the recommendations cited in the NPP and underlying documents. What if the responsible person moves or is fired?	English	N/A	Aidenvironment	Not accepted. It should be understood that the person signs on behalf of the company so it should not matter that he/she leaves
1.1 NPP Notification statement	On 1.1.7: Debería indicar Correo Electronico,Skype	Spanish	On 1.1.7: Email, Skype address should be provided	Jaremar	Not accepted.
1.1 NPP Notification statement	Statement of Acceptance of Responsibility for NPP should also be signed by a Director of the company to ensure that even with staff changes at a management level the document still stands.	English	N/A	WWF	Not accepted
1.1 NPP Notification statement	On 1.1.8: "...a signed verification statement and sends it back to the grower": This sentence contradict with Step 6 which require CB to submit to RSPO. Suggestion: RSPO should provide a standard template for the verification statement so that all the verification statement used standardise template.	English	N/A	Malaysia workshop	Accepted and change to "to the RSPO Secretariat" and refer to Appendix 1.
1.1 NPP Notification statement	On 1.1.8: The field check may or may not applicable. Propose to add in wording " (if any) "	English	N/A	Musim Mas	Not accepted.
1.1 NPP Notification statement	On 1.1.9: Do we need to include name of lead auditor conducted the verification?	English	N/A	Malaysia workshop	Point taken and will add "name of lead auditor".

1.1 NPP Notification statement	On 1.1.9: Debería indicar Correo Electronico ,Skype	Spanish	On 1.1.9: Email, Skype address should be provided	Jaremar	Not accepted.
1.2 Structure of summary reports of individual assessments: SEIA, soils, Topography, FPIC	This section should be commented by the HCV, SEIA etc assessors	English	N/A	Malaysia workshop	Noted with thanks.
1.2 Structure of summary reports of individual assessments: SEIA, soils, Topography, FPIC	FPIC process is not a required report listed in Section 2, Step 5. If indeed required, this is new and more guidance has to be given on what kind of reporting is required.	English	N/A	First Resources	Point taken. Refer to Annex 1.
1.2 Structure of summary reports of individual assessments: SEIA, soils, Topography, FPIC	For clarity it would be helpful to have a series of templates for each of the required reports rather than providing a single 'structure'.	English	N/A	WWF	Annex 1 has been revised
1.2 Structure of summary reports of individual assessments: SEIA, soils, Topography, FPIC	On 1.2.2: FPIC wrongly refers to evidence about “indigenous people affected”. The scope for FPIC is affected communities, whether or not they are indigenous or indigenous peoples.	English	N/A	Oxfam	Accepted.
1.2 Structure of summary reports of individual assessments: SEIA, soils, Topography, FPIC	On 1.2.2: Add a bullet specifying areas not to be planted – including riparian buffers	English	N/A	WWF	Point taken "add bullet point under Soil & Topography".
1.2 Structure of summary reports of individual assessments: SEIA, soils, Topography, FPIC	On 1.2.3: Summary of Management and Mitigation Plans: consider to be consistent with the Step 4: management and monitoring plans.	English	N/A	Malaysia workshop	Point taken. Change on title on Step 4 to "Management Plans".

1.2 Structure of summary reports of individual assessments: SEIA, soils, Topography, FPIC	On 1.2.3: Only cover the SEIA management and mitigation plan from the SEIA assessor. There is no timeline and PIC from company executing these plans	English	N/A	Malaysia workshop	Not accepted.
1.2 Structure of summary reports of individual assessments: SEIA, soils, Topography, FPIC	On 1.2.3: “Guidance On the basis of the independent assessment reports (Environmental Impact Assessment, Social Impact Assessment, soil and topographic survey, High Conservation Value Assessment and Carbon and GHG emission)” Contradicts Section 2 Step 3 which states that only SEIA and HCV need to be independently assessed by 3rd parties.	English	N/A	First Resources	has been changed
1.2 Structure of summary reports of individual assessments: SEIA, soils, Topography, FPIC	On 1.2.3: Identificar en la matriz los parametros de aquellos impactos ambientales que tengan un requerimiento legal	Spanish	On 1.2.3: The summary should include parameters of those environmental impacts that have a legal requirement	Jaremar	Not accepted. As it also need to meet the NI and P&C requirements as well.
1.3. Structure of summary reports of individual assessments: Carbon & GHG	Refers to “carbon and GHG”. See comment above about consistency in referecing these terms.	English	N/A	Oxfam	Not clear.
1.3. Structure of summary reports of individual assessments: Carbon & GHG	...applicable as of 1st January 2017...: until 1/1/2017 no indication whether the grower need to submit the Carbon and GHG assessment separately to RSPO.	English	N/A	Malaysia workshop	Not accepted.

1.3. Structure of summary reports of individual assessments: Carbon & GHG	On 1.3.5: As above in general comment.	English	N/A	Oxfam	Accepted.
1.3. Structure of summary reports of individual assessments: Carbon & GHG	On 1.3.5: Clarifier ce qu'est attendu dans les scénarii	French	On 1.3.5: Explain what is expected in the scenarios	Gabon workshop	Not accepted.
1.4 Structure of summary reports of individual assessments: LUC analysis	Inadequate guidance	English	N/A	Aidenvironment	Not accepted.
1.4 Structure of summary reports of individual assessments: LUC analysis	The "reporting template for LUCC" is applicable only for reporting LUC of areas cleared without HCV assessment (for purpose of compensation).It doesn't address LUC of concession not yet cleared/developed by the company.	English	N/A	First Resources	Not accepted.
1.4 Structure of summary reports of individual assessments: LUC analysis	The LUC reporting template in regards to 7.3 is not available at the RSPO website yet.	English	N/A	Musim Mas	noted
1.5 Structure of summary reports of individual assessments: HCV assessment	Inadequate guidance	English	N/A	Aidenvironment	Not accepted

1.5 Structure of summary reports of individual assessments: HCV assessment	Annex 1 contradict with Step 5 because the Summary of the Management and monitoring plan template not available in Annex 1.	English	N/A	Malaysia workshop	Accepted.
1.5 Structure of summary reports of individual assessments: HCV assessment	It refers to “Template for Public Summaries of HCV	English	N/A	Malaysia workshop	Not accepted
1.5 Structure of summary reports of individual assessments: HCV assessment	Assessment Reports” there is no signing off page in the template.	English	N/A	Malaysia workshop	This will be addressed.

1.5 Structure of summary reports of individual assessments: HCV assessment	<p>Structure of Summary Reports of Individual Assessments: HCV assessment The HCV assessment must have been led by an ALS licensed assessor and must have successfully passed the HCVRN ALS quality control system before being submitted as part of the NPP. ALS licensed assessors must follow ALS procedures and templates, including the HCV Assessment Public Summary Report Template available on: www.hcvnetwork.org/als. The Public Summary Report Template is aligned with the requirements of the RSPO NPP. However, where additional information may be required by RSPO, it is the responsibility of the licensed assessor to ensure this is included in their report.</p>	English	N/A	HCVRN	Accepted.
1.6 Guidelines for NPP map submissions	<p>What about the independent smallholder mapping constraints. Is this considered? Mapping can be costly. How RSPO is going to address this. Group Certification documents indicate hand drawn maps are acceptable.</p>	English	N/A	Malaysia workshop	Accepted.
1.6 Guidelines for NPP map submissions	<p>Doesn't address the Indonesian regulations that concession maps cannot be publicly shared</p>	English	N/A	First Resources	Noted.

1.6 Guidelines for NPP map submissions	We recommend guidance on any future changes to these maps. This is a cause of concern from stakeholders that after an NPP has undergone its comment period, the areas or borders of maps (e.g. HCV maps) could change. What is the process for this? It must be a transparent process. It must be clear why a map has been modified. This will be particularly important when the CB goes for an audit against the original (NPP version) maps. Also, especially in the case of community lands – the boundaries may change after more negotiation and after a social agreement is reached. It should be clear from maps whether some areas or boundaries are still “under negotiation” or if there are outstanding actions required before the maps can be considered “final”.	English	N/A	HCVRN	CB will audit this during the Initial audit.
1.6 Guidelines for NPP map submissions	On 1.6.2: The scale would depend on the size of area and printable in A4/A3 size/ printable size as per required for report	English	N/A	Malaysia workshop	Not accepted
1.6 Guidelines for NPP map submissions	On 1.6.2: Indikator skala peta cukup 1 : 100,000	Bahasa	On 1.6.2: 1:100,000 map scale indicator will suffice.	Indonesia workshop	Not accepted
1.6 Guidelines for NPP map submissions	On 1.6.5: Please elaborate further. Type of border (Is this referring to map border or land attribute border?)	English	N/A	Malaysia workshop	Not accepted

1.6 Guidelines for NPP map submissions	On 1.6.5: Should this specify shape files and the required format?	English	N/A	WWF	Shapefiles of location must be submitted
1.6 Guidelines for NPP map submissions	On 1.6.6: The legend need to be clear e.g. type/function (not file name for .shp etc.)	English	N/A	Malaysia workshop	Not accepted.
1.6 Guidelines for NPP map submissions	On 1.6.7: Name of cartographer? Are this required licensed cartographer drawing / authorized government personnel?)	English	N/A	Malaysia workshop	No need
1.6 Guidelines for NPP map submissions	On 1.6.8: Inset (key map) to show at least which area / part / region of the country, the new planting area is planned for development?	English	N/A	Malaysia workshop	Accepted.
1.6 Guidelines for NPP map submissions	1.6.8. Locator Map (INSET): a locator map (to locate the assessment area and/or management area within the country) is needed if the area of the map is not easily recognizable or is of large scale.	English	N/A	HCVRN	Accepted
1.6 Guidelines for NPP map submissions	1.6.9. Legible: use the appropriate font size, icons and type so that the text and icons appear clear and legible to the reader	English	N/A	HCVRN	Accepted.

Annex 2: NPP comments mechanism

General comments

Category of comment	Comments received	Language	English translation	Source of comment	RSPO response
Need for procedure post-consultation	See above [referring to comments on 30 days in General Comments]: there must be a procedure post consultation given the significant risk of non-compliance during land development, the absence of structured monitoring for a considerable number of years and the high risk of post hoc justification of non-compliances that typically come at the expense of HCVs, HCS, peatland and community rights	English	N/A	Aidenvironment	Not accepted
Need for standard templates	All comments through the NPP Comments Mechanism should be guided by a standard templates. For the CB, RSPO and the Company to receive the comments simultaneously during this process. This is similar to the public notification process for RSPO Certification	English	N/A	Genting Plantations	Noted.
Need for announcements by RSPO	RSPO need to announce immediately to the grower individually (in writing) and via RSPO website, containing: <ul style="list-style-type: none"> - the process of NPP has been completed successfully. - Grower may proceed their LC and planting. - future complaint related to the steps of NPP will be automatically rejected by the RSPO. There should be procedure, in detail, if during public comment, there is a complaint which has no relation with the NPP (example: land conflict). Still grower is allowed to do the LC or should wait till the issue resolved.	English	N/A	First Resources	Not accepted

Amend in accordance	The flowchart need to be amended in accordance to the proposed changes outlined in the NPP requirements document, namely on:1. NPP documents submitted to RSPO: Flowchart should clearly spell out the NPP documents submitted to RSPO include summary report of SEIA, soil and topography, FPIC, LUC and HCV.2. RSPO to review the documents before publishing to RSPO website in 5 working days instead of 10.3. Formal notification for completion of NPP: In line with the procedure, RSPO Secretariat will formally notify company that NPP is complete on the first working day upon completion of 30 days notification period or upon comment resolved.	English	N/A	Musim Mas	Not accepted
	As stated in the above comments.	English	N/A	GAR	Not clear

Diagram elements of subsections of Annex 2

Element	Comments received	Language	English translation	Source of comment	RSPO input

Annex 3: NPP integrated process flowchart

General comments

Category of comment	Comments received	Language	English translation	Source of comment	Outstanding

Diagram elements of subsections of Annex 3

Element	Comments received	Language	English translation	Source of comment	Outstanding