

## POIG Verification Indicators – Summary of Public Consultation Responses

Doc Ref (Indicator)	Comment (Anonymous)	Proposed Change	Changes made by POIG	Explanation of Changes
<b>1.1 High Carbon Stock and High Conservation Values</b>				
<b>1.1</b>	HCS shall always be used in a combination with HCV and a process of obtaining Free, Prior and Informed Consent to use land.	HCS shall always be used in a combination with HCV and a process of obtaining Free, Prior and Informed Consent to use land.	In 1.1.1, added "in addition to or integrated with HCV assessments" 1.1.5, added explicit reference to FPIC.	Agreed, changes made.
<b>1.1.1</b>	1.1.1 "In Addition to a HCV assessment a HCS Approach ..." Add HCV here as well to emphasise that the two are connected and needed to break the link to deforestation as stated in the requirement.	1.1.1 "In Addition to a HCV assessment a HCS Approach ..." Add HCV here as well to emphasise that the two are connected and needed to break the link to deforestation as stated in the requirement.	Added "in addition to or integrated with HCV assessments"	Agreed, changes made.
<b>1.1.1</b>	<b>Proposed changes:</b> The HCS and HCV approaches combine biodiversity, large landscapes, habitat conservation, ecosystem services, carbon conservation and social considerations including community needs and culture and will be conducted prior to establishing new plantations or expanding existing ones.  <b>Why these changes are essential:</b> 1.1 is entitled "HCS and HCV" - meaning that both approaches are essential for sustainable and	<b>Proposed changes:</b> The HCS and HCV approaches combine biodiversity, large landscapes, habitat conservation, ecosystem services, carbon conservation and social considerations including community needs and culture and will be conducted prior to establishing new plantations or expanding existing ones.	Added "in addition to or integrated with HCV assessments"	Agreed, changes made.

	<p>responsible oil palm developments. HCV is also an "approach" and not just a type of assessment. The HCV approach is an established (since 1999) and well-proven methodology with an operational system for licensing assessors and widely recognised and endorsed HCV Resource Network Common Guidance for how to identify High Conservation Values. HCV assessments should be referred to on par with, and alongside HCS assessments, not subsumed under, or as part of that concept. HCV covers biodiversity, rare ecosystems and habitats, large landscapes, ecosystem services, community livelihood needs and cultural identity.</p>			
<b>1.1.2</b>	<p>There is no reference here to the problem of defining HCS. If these indicators pre-suppose international agreement and/or national interpretation of HCS definitions, this should be stated somewhere.</p>	<p>Define HCS/Make reference to the issues in defining HCS.</p>	<p>Accepted, see footnote on the HCS approach. The HCS approach is currently defined via the HCSA Toolkit: <a href="http://highcarbonstock.org/">http://highcarbonstock.org/</a></p>	<p>Agreed, changes made.</p>
<b>1.1 &amp; 1.1.4 (now 1.1.5)</b>	<p>Although we strongly support the call to reduce greenhouse gas emissions for land use change because of the vast impacts of climate change on people living in poverty across the globe, we observe that 1.1 talks about HCS, HCV and FPIC and combining biodiversity conservation, carbon conservation and social considerations including community needs; but the sub-indicators do not adequately clarify how FPIC is included in the HCS mapping process (nor does the distinct FPIC indicator 2.1). HCS seems to prevail over other elements and suggests that community needs that would involve conversion of (low levels of) carbon</p>	<p>Suggestion for the development of an overall fair and green growth approach at the landscape level that evaluates various land use planning alternatives, using comprehensive and participatory SEIA and mitigation of any negative impacts within the same landscape.</p>	<p>More explicit reference made to community mapping and FPIC in 1.1.4 and 1.1.5.</p>	<p>This suggestion goes beyond what HCS approach does. The HCS Approach toolkit can be referenced for additional guidance, but this level of detail cannot be included in the indicators.</p>

	<p>stock are unacceptable, even if they would meet specific, inclusive and accountable development needs and a net compensation of the carbon loss. Obviously, this is not at all an easy balance and a highly contested topic. Still, we suggest the development of an overall fair and green growth approach at the landscape level that evaluates various land use planning alternatives, using comprehensive and participatory SEIA and mitigation of any negative impacts within the same landscape.</p> <p>However, 1.1.4 is strong since having a participatory plan that conserves the land is as important as mapping the lands that need to be conserved. We suggest to make this a major indicator.</p>			
<b>1.1.3 &amp; 1.1.4 (now 1.1.5)</b>	<p>The question seems to suggest only ONE major indicator per section, contrary to what other standards, including RSPO, currently have.</p> <p>1.1.3 is good. However, 1.1.4 is strong since having a participatory plan that conserves the land is as important as mapping the lands that need to be conserved. We suggest to make this an additional major indicator.</p>	Suggestion to make 1.1.4 an additional major indicator.	No Change	2.2.2 Covering participatory mapping is already a major indicator.
<b>Doc Ref (Indicator)</b>	<b>Comment (Anonymous)</b>	<b>Proposed Change</b>	<b>Changes made by POIG to Indicators</b>	<b>Explanation of Any Changes</b>
<b>1.2 Peatland</b>				
<b>1.2.2</b>	There should be no use of fire, anywhere	There should be no use of fire, anywhere	No Change	Agree, but covered by RSPO so not necessary here
<b>1.2.3</b>	What represents an 'opportunity'? From scientific literature 'improved plantation water management will reduce these	Clarify what represents a restoration 'opportunity' and define which peatland	Definition for critical peatland added. No further changes made.	Opportunity is based on assessments carried out by experts.

	impacts by 20% at most, relative to current conditions. High rates of carbon loss and land subsidence are inevitable consequences of conversion of forested tropical peatlands to other land uses'. Which peatland ecosystems would be classed as 'critical'?	ecosystems would be classified as 'critical'		
<b>1.2.3</b>	What mechanism for land swaps? Would a company be given preference for assignment of new concessions in return for handing back to government restored peatland areas? How would this work when indicator 1.2.3 refers to existing planting, not land banks.	No specific recommendation for change.	No Change	Good point and issue. 1.2.4 Peatland Restoration Strategies will further define. Cannot specify this level of detail in the indicators at this stage. Peatland expert studies that are currently underway in Indonesia are expected to provide additional guidance in the next 12 months and this could then be incorporated into the POIG indicators in the future.
<b>1.2.3-5</b>	We support the need to conserve peatlands for its environmental and social values and the negative impacts of greenhouse gas emissions resulting from clearing peat. However, indicators 1.2.3 and 1.2.4 seem overly prescriptive – restoring or rewetting peat lands is tricky business and peatland hydrology differs across regions, soil types etc. 1.2.5 is a good indicator but again gets too prescriptive.	Consider making 1.2.3, 1.2.4, and 1.2.5 less prescriptive.	No Change	All of this language has come from Peatland experts.
<b>1.2.3</b>	1.2.3 Add "independent": "Where there is existing planting on peat, an INDEPENDANT assessment shall be required to determine..." or define, who is doing these assessments.	1.2.3 Add "independent": "Where there is existing planting on peat, an INDEPENDANT assessment	No Change	Companies do not tend to have any internal peat experts. Other frameworks have

		shall be required to determine..." or define, who is doing these assessments.		indicated independent assessors. Making it public in 1.2.7 already obliges company to make a quality/credible assessment.
<b>1.2.5</b>	<p>1.2.5 Existing oil palm plantations on peat soils shall not be replanted at the end of the economic rotation. Such sites shall be restored to natural vegetation and hydrological processes.</p> <p>Drainability assessments shall be required prior to replanting on peat. Where further drainability is constricted plantations shall be removed at the end of the current rotation and the site shall be restored to natural vegetation and hydrological processes.</p>	<p>1.2.5 Existing oil palm plantations on peat soils shall not be replanted at the end of the economic rotation. Such sites shall be restored to natural vegetation and hydrological processes.</p> <p>Drainability assessments shall be required prior to replanting on peat. Where further drainability is constricted plantations shall be removed at the end of the current rotation and the site shall be restored to natural vegetation and hydrological processes.</p>	No Change	This is a more rigorous requirement than agreed in the Charter but recent research and guidance coming from peatland experts may make this change to the Charter and associated indicators possible in its next revision.
<b>Doc Ref (Indicator)</b>	<b>Comment (Anonymous)</b>	<b>Proposed Change</b>	<b>Changes made by POIG to Indicators</b>	<b>Explanation of Any Changes</b>
<b>1.3 Greenhouse gas (GHG) accountability</b>				
<b>1.3.1</b>	<p>We agree; see introductory comment in section 1.1.</p> <p>1.3.1 is an indicator that is more comprehensive than what RSPO Next has in terms of sources of GHG emissions that need to be measured.</p>	None	No Change	n/a
<b>1.3.2 &amp; 1.3.3</b>	No guidance on acceptable or target rates per unit area or volume production.	Include specific guidance on acceptable or target rates per	No Change	Generic reduction targets do not take into account the specific

		unit area or volume production.		situations/contexts of companies. Adequate baselines spanning several years are required to develop meaningful targets.
<b>1.3.2</b>	1.3.2 should be a major indicator because the reduction is the most important indicator.	Make 1.3.2 a major indicator	No Change	1.3.3 requires reporting on requirement 1.3.2, so 1.3.2 must be achieved to meet 1.3.3.
<b>Doc Ref (Indicator)</b>	<b>Comment (Anonymous)</b>	<b>Proposed Change</b>	<b>Changes made by POIG to Indicators</b>	<b>Explanation of Any Changes</b>
<b>1.4 Pesticide use minimisation</b>				
<b>1.4.2</b>	We do not agree to point 1.4.2., because emergency use has to be permitted, but defined. We cannot ban emergency use in general without definition, what is an emergency. There is an high importance regarding economic impacts, if a grower is not allowed to protect his crop in a case of pest etc.	Define emergency use.	Accepted, emergency use has been defined in the Glossary.	n/a
<b>1.4.2</b>	1.4.2 is not worded as an indicator The requirement states that producers shall by preference practice natural weed and pest control and IPM, but this is not really reflected in the two indicators proposed here.	Reformulate indicators so they reflect the requirement better.	Accepted, see indicator 1.4.2.	n/a
<b>1.4.2</b>	In the current wording 1.4.2. allows an exceptional use - albeit "as an absolute last resort" - of ALL the prohibited pesticides listed in 1.4.1. We believe the WHO and international convention listed chemicals should never be used. The POIG organising Committee approvals of exceptional use of the others – with specific guidance for use! -	Clarify that the WHO and international convention listed chemicals should never be used, and make sure the use of others include guidance.	Emergency use has been defined in the Glossary.	The complete exclusion including emergency use of the WHO list and international convention listed chemicals needs further investigation to assess if this is feasible and practical. Not

	should be transparent (procedure, composition etc.) and publicly accountable.			included in indicator at this stage and revision of the POIG Charter may be required.
<b>1.4.1 &amp; 1.4.2</b>	1.4.1 Exchange FSC/ SAN list with the "Pesticide Action Network List (PAN)" and add Glyphosat. FSC and SAN lists don't fit for palm oil and are lists of other certification systems that are in a constant process of changes (SAN at the moment with a high possibility of getting weaker). 1.4.2 Erase this. As a Minimum: define, which pesticides might be used in emergency cases.	1.4.1 Exchange FSC/ SAN list with the "Pesticide Action Network List (PAN)" and add Glyphosat. 1.4.2 Erase this. As a Minimum: define, which pesticides might be used in emergency cases.	Emergency use has been defined in the Glossary, but no further changes made.	Replacing the FSC/SAN list with the PAN list and prohibiting Glyphosate would require a change in the Charter.  Not possible to define which pesticides can be used in emergency cases as each emergency may require different compounds.
<b>Doc Ref (Indicator)</b>	<b>Comment (Anonymous)</b>	<b>Proposed Change</b>	<b>Changes made by POIG to Indicators</b>	<b>Explanation of Any Changes</b>
<b>1.5 Chemical Fertiliser</b>				
<b>1.5.1</b>	There is no baseline suggested for 'minimisation' of use.	Include a baseline suggestion for minimisation of use.	No change.	It is not possible to define a uniform baseline as baselines would vary across different soil types and geographies.
<b>1.5.1 &amp; 1.5.2</b>	1.5.1 Use of fertilisers shall be applied on the basis of soil sampling. Use of chemical fertilisers shall be minimised. Precedence should be given to maintaining or raising the soil organic matter content in the soil (e.g. by using of organic residues, manure, organic fertilisers, cover crops and others). 1.5.2 Phosphorus and nitrogen levels in relevant watercourses shall be monitored and should be adjusted. Add: 1.5.4 Soil organic matter content should be monitored and should be adjusted.	Suggestion to change 1.5.1 and 1.5.2 to the wording below: 1.5.1 Use of fertilisers shall be applied on the basis of soil sampling. Use of chemical fertilisers shall be minimised. Precedence should be given to maintaining or raising the soil organic matter content in the soil (e.g. by using of organic residues, manure, organic	Footnote added to include alternatives mentioned in the comment, which also benefits soil organic matter. No further changes made.	The requirement does not make reference to soil organic matter. Therefore not included at this point in time.

		fertilisers, cover crops and others). 1.5.2 Phosphorus and nitrogen levels in relevant watercourses shall be monitored and should be adjusted. Add: 1.5.4 Soil organic matter content should be monitored and should be adjusted.		
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<b>1.6 GMOs Prohibition</b>				
No Comments				
Doc Ref (Indicator)	Comment (Anonymous)	Proposed Change	Changes made by POIG to Indicators	Explanation of Any Changes
<b>1.7 Water Accountability</b>				
<b>1.7</b>	POIG requirement refers to maintaining quantity and quality, but this would be stronger if it referred to maintaining acceptable standards, rather than maintaining pre-development conditions. This could be made clearer, but in fact the indicators are more helpful in this respect.	No specific recommendation for change.	No Change	No changes to the requirements of the POIG Charter are being made at this time.
<b>1.7.1</b>	1.7.1 Water consumption across plantation operations shall be monitored in an appropriate manner, e.g. use of flow meters. Corrective actions should be taken in case of water losses. All irrigation water needs to come from legal water sources which includes the farms needs to have concession for the respective water they use on the farm or mill	Change to: 1.7.1 Water consumption across plantation operations shall be monitored in an appropriate manner, e.g. use of flow meters. Corrective actions should be taken in case of water losses. All irrigation water needs to come from legal water sources which includes the farms needs to have concession for	1.7.1 Water use, consumption and pollution by plantation operations and mills are monitored. 1.7.2 The water management plan includes targets and measures to minimise and/or reduce water use, consumption, and pollution, including in both plantations and mills.	Included “and use” under 1.7.2. to cover possible losses. Irrigation is covered under use. Legality is covered under RSPO legal compliance.



		the respective water they use on the farm or mill.		
<b>1.7.2 &amp; 1.7.4</b>	1.7 is an important indicator with both environmental and social dimensions. Making 1.7.2 the major indicator would put emphasis on water quantity considerations rather than water quality + quantity and managing emissions to water to prevent impact on people and the environment. We suggest POIG considers making 1.7.4 the major indicator instead.	Make 1.7.4 the major indicator	Accepted, pollution included under 1.7.1, 1.7.2, and 1.7.3. However, 1.7.2. is kept as major indicator.	n/a
<b>Doc Ref (Indicator)</b>	<b>Comment (Anonymous)</b>	<b>Proposed Change</b>	<b>Changes made by POIG to Indicators</b>	<b>Explanation of Any Changes</b>
<b>1.8 Protect and Conserve Wildlife</b>				
<b>1.8</b>	In support, we appreciate the approach to HCV1-3 beyond the management area at the larger landscape level where the company can have a positive influence and/or reduce negative impacts on HCVs. A similar principle must be applied to HCV 4-6.	Apply landscape approach to HCV 4-6 in addition to HCV 1-3.	No Change	The POIG Charter Requirement for 1.8 only covers HCV 1-3.
<b>1.8.1, 1.8.3, 1.8.4</b>	The wording of indicator 1.8.1 refers to HCVs 1-3, but then focusses only on species. It would be stronger if there were reference to habitats and functional ecosystems. There is no indicator for effectiveness of action planning referred to in 1.8.3 and 1.8.4.	Make reference to habitats and functional ecosystems. Include indicator for effectiveness of action planning as references in 1.8.3 and 1.8.4	No Change	The POIG Charter requirements only cover rare, threatened and endangered species. In criteria 1.8.2, "actions for their protection and survival" considers habitats and functional ecosystems.
<b>1.8.1</b>	1.8.1 define "beyond the Management area" and include HCV 4. Add: "ensure that HCV areas are connected (e.g. through habitat restoration) and corridors are conserved and by creating buffer zones around HCV/ HCS areas."	1.8.1 define "beyond the Management area" and include HCV 4. Add: "ensure that HCV areas are connected (e.g. through habitat restoration) and corridors are	Changed to "Outside the management area".	"Outside the management area" is more explicit as a reference. Including HCV 4 goes beyond the scope of requirement in 1.8.

		conserved and by creating buffer zones around HCV/ HCS areas.”		
<b>1.8.1</b>	<p><b>1.8.1 Proposed change:</b> Where HCV 1-3 have been identified, management plans shall include action plans for protection and maintenance of those High Conservation Values. Additionally, efforts should be made to protect these HCVs in the landscape beyond the management area.</p> <p><b>Why changes are essential:</b> HCV 1-3 in not only about rare, threatened and endangered species. HCV 1-3 covers significant concentrations of biodiversity, large functional landscapes and corridors and rare, threatened and endangered ecosystems and habitats. It is much more inclusive to refer to action plans for protection of HCVs 1-3 rather than only referring to RTE species. It will also be very difficult to put this indicator into practice. It is not practical to require an action plan for the protection and survival of ALL RTE species in the LANDSCAPE beyond the management area. The size of the landscape and the distance from the management area is not specified and this is too open to interpretation. The intention is good - that the plantation manager should take responsibility and contribute to conservation beyond the management area boundaries. However, it needs to be reformulated. Perhaps some kind of requirement to show that efforts are made to cooperate with neighbours in the</p>	<p><b>1.8.1 Proposed change:</b> Where HCV 1-3 have been identified, management plans shall include action plans for protection and maintenance of those High Conservation Values. Additionally, efforts should be made to protect these HCVs in the landscape beyond the management area.</p>	No Change	The change proposed moves beyond the Charter requirement.

	landscape or to contribute to conservation efforts in the wider landscape.			
<b>1.8.4</b>	Include specific wording on making traditional hunting only permissible when a country's government allows it.	Include specific wording on making traditional hunting only permissible when a country's government allows it.	No Change	The authority of a company cannot go beyond the boundary of its management areas.
<b>1.8.4</b>	<p>1.8.4 Complete revision of indicator recommended.</p> <p><b>Why changes necessary:</b> Before this indicator can be reformulated - several issues must be considered. It is problematic because it says to "take traditional hunting into consideration" - but it also says to "achieve the protection and survival of RTE species". Does this mean that no traditional hunting of any RTE species is allowed? Many things to consider here. Are the RTE legally protected? What kind of rights do traditional hunters have? Is hunting an HCV 5 value? The indicator does not specify how far "outside the management area" these communities might be located. The indicator needs to be reconsidered after thinking about these questions.</p>	1.8.4 Complete revision of indicator recommended.	"Achieved" changed to "contribute" in 1.8.3. No further changes made.	Too early to determine a methodology. Trials will contribute to future refinements of the indicators. Companies have limited authority beyond the boundaries of their management areas.
<b>Doc Ref (Indicator)</b>	<b>Comment (Anonymous)</b>	<b>Proposed Change</b>	<b>Changes made by POIG to Indicators</b>	<b>Explanation of Any Changes</b>
<b>2.1 Free, Prior and Informed Consent</b>				
<b>2.1.4</b>	I cannot evaluate this indicator and neither agree or disagree. This consultation program lacks the possibility to report fully your opinion.	No specific recommendation for change.	2.1.4 was combined with 2.1.3 and re-written to make it clearer. It now reads, "2.1.3 When acquiring or replanting existing plantations, measures are taken to redress any issues arising	Revisions to 2.1.3 and 2.1.4 aim to clarify intent and auditability

			from the lack of or inadequate FPIC processes carried out when those plantations were established. In such cases, participatory surveys will be conducted to identify HCV's 4, 5 and/or 6 that existed before the plantation was established."	
<b>2.1.2 &amp; 2.1.5</b>	2.1.2 Is not worded as an indicator 2.1.5 The relevance to the private sector is not clear. If the concern is to preclude companies from acquiring tenure of land previous acquired by government through application of 'eminent domain' wording needs to be clearer, and perhaps some cut-off date indicated.	Rewrite 2.1.2 in better indicator language  Include a cut-off date and articulate the responsibility of company more clearly in 2.1.5	2.1.2 was re-written as "Processes of consultation and negotiation, in accordance with internationally recognized FPIC standards, are not be constrained by local legal frameworks."  2.1.5 became 2.1.4 and was re-written as "Plantations have not been developed on land acquired through expropriations in the national interest (eminent domain) after March 2014."	2.1.2 was re-worded to better read as an indicator  2.1.5 was re-worded to include a cut-off date and make clear that plantation companies are not to develop on such lands.
<b>n/a</b>	The Requirement Statement contains a 70 word sentence. This could redrafted to make it more readable. The reference to legal and customary rights needs rewording to make it clearer whose rights are being referred to. At a more fundamental level, defining the 'local community' is not necessarily straightforward where there has been inward migration over a long period of time.	Re-draft requirement statement to make it more readable.	No Change	No changes are being made to the POIG Charter requirements at this time.

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2.2 Food Security				
<b>2.2.1</b>	<p>2.2.1 Smallholders and indigenous communities are not 'on existing plantations'.</p> <p>POIG provision for set aside of food production land presumably refers to land allocation within concessions, but how would this work for neighbouring</p>	2.2.1 Smallholders and indigenous communities are not 'on existing plantations'.	Accepted, change made to "smallholders and indigenous local communities affected by existing plantations". Footnote addresses that food production area may be outside concession.	n/a
<b>2.2</b>	<p>On social issues, POIG seems to have more specific indicators on issues like food security whereas RSPO Next uses a broader SEIA umbrella. E.g. 2.2.2 setting aside .5 ha of land per person. However, again these indicators, especially 2.2.2, risk to be overly prescriptive (see general comment in 1.2). Current wording in this section does not make clear enough if these requirements are all for existing plantations as well as new plantings.</p>	Make 2.2.2 less prescriptive and re-word to clarify if requirements are all for existing plantations as well as new plantings.	Accepted, 2.2.2 clearly states "in new plantations or expansion of existing plantations." No further changes	Specificity of 2.2.2 makes it strong from an auditing standpoint.
<b>2.2.2</b>	2.2.2 Clear definition needed what the 0.5 hectares refer to and for which cases they apply.	2.2.2 Clear definition needed what the 0.5 hectares refer to and for which cases they apply.	Accepted, footnote has been added.	n/a
<b>2.2.2 &amp; 2.2.3</b>	Rather than a very prescriptive requirement in 2.2.2, we suggest the more goal-oriented 2.2.3 (enhance local food security) as major indicator.	Rather than a very prescriptive requirement in 2.2.2, we suggest the more goal-oriented 2.2.3 (enhance local food security) as major indicator.	No Change	2.2.3 is more difficult to measure than 2.2.2.

<b>2.2.2</b>	2.2.2 After March 2014, a minimum of 0.5 ha per person (in a family unit) plus additional land depending on fallow periods, soil fertility and yield shall be identified via participatory mapping, and enclaved for active farming meeting food security needs.	2.2.2 After March 2014, a minimum of 0.5 ha per person (in a family unit) plus additional land depending on fallow periods, soil fertility and yield shall be identified via participatory mapping, and enclaved for active farming meeting food security needs.	Footnote has been added to include fallow periods, soil fertility and yield.	n/a
<b>Doc Ref (Indicator)</b>	<b>Comment (Anonymous)</b>	<b>Proposed Change</b>	<b>Changes made by POIG to Indicators</b>	<b>Explanation of Any Changes</b>
<b>2.3 Effective Conflict Resolution</b>				
<b>2.3.5</b>	<p>2.3.5 The reference to outcomes being 'considered mutually agreed' would seem to be redundant if there is mutual agreement between parties on a resolution.</p> <p>More fundamental concerns; Who owns a conflict resolution system? Can one of the parties to the conflict be held responsible for the outcomes of a conflict resolution process?</p> <p>Negative social impacts are also a consequence of structural processes, not so amenable to mitigation through plans at company level</p>	No specific recommendation for change.	No Change	No recommended changes. Comments pertained to broader, structural issues, while these indicators outline expectations for company-based grievance mechanisms in alignment with UN Guiding Principles on Business and Human Rights.
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<b>2.4 Social Conditions</b>				
<b>2.4</b>	<p>Additional wording in this section 2.4 could add emphasis on the promotion of positive social impacts.</p> <p>Good to see reference to empowerment of women in 2.4.2; other indicators could be</p>	No specific recommendation for change.	No Change	No specific recommended changes so no changes made.

	reviewed and become more gender sensitive.			
<b>2.4.1</b>	I suggest adding something about the impact of migrant workers on local communities. Suggested new text in red: "2.4.1 Social impact assessments and plans for the avoidance or mitigation of impacts shall incorporate the issues of potential human rights violations, influx of migrant workers into communities, social conflicts and land grabbing."	"2.4.1 Social impact assessments and plans for the avoidance or mitigation of impacts shall incorporate the issues of potential human rights violations, influx of migrant workers into communities, social conflicts and land grabbing."	2.4.1 updated to "Social impact assessments and plans for the avoidance or mitigation of impacts address the issues of potential human rights violations, social conflicts, impacts of migrant workers on local communities, and land grabbing."	Change Accepted. Indicator modified to include impacts of migrant workers on local communities
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<b>2.5 Workers' rights</b>				
<b>2.5.2</b>	2.5.2 It would be helpful to specify whether the strict monitoring should be internal or external  No mention in POIG indicators of; - Compliance with legislation on minimum wages - Hazardous work for adults  Also no distinction between core workforce and casual workers	Specify whether the strict monitoring should be internal or external for 2.5.2. Create distinction between core workforce and casual workers.	"Monitored" replaced with "recorded". Legal compliance included in RSPO P&C. New indicator 2.5.5 included to include casual, temporary, seasonal and migrant workers. 2.5.1 also added to strengthen protections for vulnerable workers.	n/a
<b>2.5.3</b>	2.5.3 It may be useful to make it absolutely clear that overtime in excess of the hours permitted by law is not permissible even if the worker declares that it is done voluntarily.	Make it absolutely clear that overtime in excess of the hours permitted by law is not permissible even if the worker declares that it is done voluntarily.	Change Accepted. Indicator modified to reflect that excessive overtime is not permitted.	n/a
<b>2.5.8</b>	It would be necessary to address the question of fees paid by the workers to agencies in home country to pay for	Add obligation/responsibility of the employer.	No Change. The obligation of the employer is indicated: to not charge fees or costs to	Suggestions reflected in 2.5.12.

	expenses such as internal travel, passport processing, airfares etc. without reference to the employer. What would be the obligation/responsibility of the employer		the worker and to ensure they are reimbursed if such fees or costs are discovered.	
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<b>2.6 Support to Smallholders</b>				
<b>2.6.1-4</b>	It is absolutely critical to get the smallholders onboard and several different ways to support them will probably be needed. Without the smallholders the whole idea of RSPO and POIG run into serious difficulties and will lose its trust among consumers.	No specific recommendation for change.	No Change	No specific recommended changes so no changes made.
<b>2.6</b>	Good to see these indicators included. The POIG Requirement for Support to Smallholders matches well with the SHARP framework for Responsible Sourcing from Smallholders (RSS)	No specific recommendation for change.	No Change	No specific recommended changes so no changes made.
<b>2.6</b>	On indicator 2.6, POIG does talk about fair contracts which is a step in the right direction. Inclusion and fair business relations with smallholders, whether associated or independent, are crucial to maintain the social licence to operate for palm oil companies and these indicators can support this. Oxfam's FAIR principles for company-community relations (i.e. beyond the scope of smallholders only) provide further guidance as summarised below.  Although this is usually the case, 2.6.1 suggests that smallholders can never achieve higher productivity than plantations, so we propose to add the words "at least the same".	2.6.1 Add the words "at least the same". 2.6.3 should read "RSPO compliant". 2.6.4 should read "a compliance plan". After all, certification is only a means to an end: compliance. We favour fair business relations with supplying small farmers, which may result in more inclusive and structural - i.c. sustainable - relations.	"At least the same" added to 2.6.1, and no further changes made.	Certification is more auditable than compliance.



<p>2.6.3 and 2.6.4 illustrate a common misrepresentation of the RSPO certification rules with regards to associated smallholders. These are part of the scope of an RSPO certificate that covers the mill and its supply base. To prevent exclusion, mills were given the responsibility of ensuring compliance in the full supply base. Associated smallholders do not need to be separately certified to (RSPO) criteria but rather comply to (RSPO) criteria as verified within the mill's CPO certification audit. In principle the same can be done for independent smallholders with a structural business relation to one mill. In addition, groups of independent smallholders (without a certified mill) can use group certification of FFB.</p> <p>2.6.3 should read "RSPO compliant". 2.6.4 should read "a compliance plan". After all, certification is only a means to an end: compliance. We favour fair business relations with supplying small farmers, which may result in more inclusive and structural - i.c. sustainable - relations.</p> <p>FAIR = F+A+I+R:          Freedom of choice:          1. Companies and communities promote free, prior and informed consent, including women, minorities and workers in the decision making (e.g. on land acquisition, partnership agreements, contracts, financial arrangements).          2. All affected community members, including women and minorities, have a</p>			
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	<p>voice in determining how land is used and owned.</p> <p>3. Companies and communities pursue long-term partnerships based upon symmetrical power relationships and a healthy interdependency (including the promotion of community and smallholder organisations).</p> <p>Accountability:</p> <p>4. Companies and communities ensure internal alignment on the intent of the partnership and respect the commitments they have made.</p> <p>5. Companies and smallholders enter into fair and transparent agreements and respect defined conditions on pricing, quality norms, delivery, payments and loan reimbursement.</p> <p>6. Mechanisms to submit grievances and solve disputes are accessible and functioning, also for women and minorities.</p> <p>Improvement of benefits:</p> <p>7. Companies and communities pursue shared value creation, enabling smallholders – both men and women – to earn a decent living and to invest in the improvement and continuity of their farms.</p> <p>8. Companies and communities collaborate to close yield gaps by increased resource use efficiency (water, nutrients, chemicals and energy) and low external input technologies.</p> <p>9. Companies and communities improve resilience to shocks linked to prices, pests and climate.</p> <p>10. Companies and communities apply climate-friendly practices and protect</p>			
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	<p>biodiversity.</p> <p>11. Companies and communities invest in community infrastructure (e.g. health, education, water and roads).</p> <p>Respect for rights:</p> <p>12. Companies and communities respect land and other resource use rights, including those of women and indigenous peoples and do not negatively affect local food security.</p> <p>13. Companies and communities respect labor rights, human rights and indigenous peoples' rights.</p> <p>14. Companies and communities promote equal opportunities and rewards between men and women.</p>			
Doc Ref (Indicator)	Comment (Anonymous)	Proposed Change	Changes made by POIG to Indicators	Explanation of Any Changes
<b>Section 3.1 Anti-corruption and transparency</b>				
<b>3.1.1-4</b>	A policy is necessary but the most important is how it is implemented and followed.	No specific recommendation for change.	No Change	No specific recommended changes so no changes made.
<b>3.1.3 &amp; 3.1.4</b>	<p>3.1.3 needs editing, e.g. add "shall be available".</p> <p>3.1.4 seems to suggest the effectiveness of anti-corruption measures does not need to be demonstrated in cases where anti-corruption legislation is available. A policy is just one of the (first) measures referred to. We suggest to rewrite this into: "3.1.4 Anti-corruption measures shall be demonstrated, especially in cases where anti-corruption legislation is lacking, proportionate to the scale and intensity of management activities and the risk of corruption"</p> <p>3.1.4. instead, with edits as indicated above.</p>	<p>3.1.3 needs editing, e.g. add "shall be available".</p> <p>Suggest to rewrite 3.1.4 into: "3.1.4 Anti-corruption measures shall be demonstrated, especially in cases where anti-corruption legislation is lacking, proportionate to the scale and intensity of management activities and the risk of corruption"</p>	3.1.3 and 3.1.4 suggestions have both been accepted.	n/a

Doc Ref (Indicator)	Comment (Anonymous)	Proposed Change	Changes made by POIG to Indicators	Explanation of Any Changes
<b>Section 3.2 Traceability</b>				
<b>3.2.1. &amp; 3.2.3</b>	Arguably, 3.2.3 is a better major indicator that will remain relevant also after 12 or 24 months, while these intermediate targets would logically have to be part of any time bound plan as required in 3.2.3.	Make 3.2.3 major indicator.	No Change	Without a traceability system in place any of the subsequent work is not possible.
<b>3.2.2</b>	3.2.2 This is not a realistic timeframe for mills with large independent smallholder supply bases to identify and engage with these suppliers, identify risks and work with smallholders to manage these.	Change to a more realistic timeframe	No Change	Expectation is that traceability is addressed as part of due diligence before applying. POIG members are RSPO certified as well.
<b>3.2.2</b>	3.2.2 It should not take 12 months to exclude illegal sources, maximum 3 months.	Proposal to change 12 months to 3 months.	Change for 3.2.2 not accepted.	3 months seems overly ambitious.
<b>3.2.3</b>	3.2.3 Within 24 months; time bound plan needed, alternatives may be defined for independent smallholders.	3.2.3 Within 24 months; time bound plan needed, alternatives may be defined for independent smallholders.	3.2.3. Within 24 months of commitment to the Charter the company will have a time-bound plan to bring all FFB sourced into compliance with the POIG indicators and efforts to bring non-compliant smallholders into compliance are documented.	Agreed, changes made in timeframe.
<b>3.2.3.</b>	Although we agree with the concept of a time bound plan and the purpose of bringing FFB sources into compliance, current wording still entails the risk that the time bound plan proposes to exclude non-compliant smallholders in year x without doing any constructive and inclusive efforts to work actively with non-compliant suppliers to address potential areas of	Wording change	3.2.3. Within 24 months of commitment to the Charter the company will have a time-bound plan to bring all FFB sourced into compliance with the POIG indicators and efforts to bring non-compliant smallholders into compliance are documented.	Included wording under 3.2.3.

	improvement. Words along such lines should be added to 3.2.3.			
<b>3.2.3</b>	3.2.3 Many POIG indicators will be difficult to interpret for independent smallholder suppliers, so how to plan for compliance?	No specific recommendation for change.	No Change	POIG acknowledges this as an issue, and recognise adaptation of POIG indicators for smallholders will need to happen in the future. Indicator 2.6 provides support for independent smallholders that are tied to POIG members to achieve RSPO certification and POIG verification.
<b>Doc Ref (Indicator)</b>	<b>Comment (Anonymous)</b>	<b>Proposed Change</b>	<b>Changes made by POIG to Indicators</b>	<b>Explanation of Any Changes</b>
<b>Section 3.3 Report on Social, Labor and Environmental Performance</b>				
<b>3.3.2 &amp; 3.3.1</b>	3.3.2 It is positive to report according to GRI but I do not think it is among the most important steps to take now. 3.3.1 is much more important.	Proposed to make 3.3.1 major indicator	Agreed, adopted.	n/a
<b>3.3</b>	POIG requirement 3.3 is the catch all for reporting on reporting on Social, Labour and Environmental Performance. Reporting requirements feature amongst indicators in many other sections. Is there some redundancy here?	Combine reporting requirements	No Change.	GRI reporting is the internationally recognised standard for sustainability reporting. Other reporting requirements of the POIG indicators address specific issues, not included in GRI.
<b>3.3</b>	While we strongly support public reporting as part of accountability to stakeholders, indicator 3.3 on GRI reporting may be considered an over kill in detail and hindering adoption of POIG charter by larger numbers of growers.	No specific recommendation for change.	No Change.	GRI reporting is the internationally recognised standard for sustainability reporting.

Doc Ref (Indicator)	Comment (Anonymous)	Proposed Change	Changes made by POIG to Indicators	Explanation of Any Changes
<b>Section 3.4 RSPO Certification and Company Operations</b>				
<b>3.4.2 &amp; 3.4.3</b>	Along same lines as in 3.2, arguably 3.4.3 will hold longer as a relevant major indicator.	Make 3.4.3 a major indicator	No Change	The verification working group considers 100% RSPO certification an indispensable requirement.
<b>3.4.3</b>	3.4.3 The SHARP partnership would suggest that implementation of the Responsible Sourcing from Smallholders (RSS) framework should be recognised as an acceptable alternative for independent smallholders.	Recognize the Responsible Sourcing from Smallholders (RSS) framework as an acceptable alternative for independent smallholders.	No Change	Can be considered for implementation: not for inclusion in indicators.
<b>3.4.3</b>	Interestingly, this indicator illustrates very well how POIG considers RSPO compliance to be a solid basis and POIG as a NEXT step. This indicator, however, also illustrates that as a stand-alone set of indicators POIG may be robust but without an infrastructure for supporting the auditing against these criteria, the scale of sector transformation is likely going to be very limited.	None	No Change	n/a
<b>3.4.3-4</b>	3.4.3-4 It is crucial that smallholders supplying FFB receives support to be able to reach RSPO level and not are kicked out of business.	None	No Change	3.4.3 states that acceptable alternatives may be defined for independent smallholders.
Doc Ref (Indicator)	Comment (Anonymous)	Proposed Change	Changes made by POIG to Indicators	Explanation of Any Changes
<b>Section 3.5 Responsible Supply Chains</b>				
<b>3.5.1 &amp; 3.5.2</b>	Building on our comment in the previous indicator, the risk of this particular indicator is that it does not drive change and prevent unsustainable practices but rather verifies "POIG flagship plantations" within a group.	No specific recommendation for change.	No Change	Requirement 3.5 clearly spells out scope, which is entire group rather than "flagship plantations".

	<p>RSPO's anti-flagship certification requirements could be taken as a starting point to review this indicator and design measures that will ensure progress towards compliance of entire groups/holding companies and their assets including land banks. The title of this indicator may also need review to cover the intent of verifying all assets within their sphere of control and influence, irrespective of the share held. Moreover, the timeframe of 12 months in 3.5.1 and the annual frequency of reporting in 3.5.2 seem to contradict envisioned timeframes in 3.4.2 and 3.3.1 respectively.</p>			
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